

**48<sup>th</sup> SESSION**

Report  
CG(2025)48-13  
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## **Empowering cities and regions to combat human trafficking for labour exploitation**

Committee on Social Inclusion and Human Dignity

Rapporteurs:<sup>1</sup> Cecilia DALMAN EEK, Sweden (R, SOC/G/PD)  
Martine DIESCHBURG-NICKELS, Luxembourg (L, ILDG)

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### *Summary*

Trafficking in human beings is an international phenomenon and crime that violates the most fundamental human rights. It finds its root causes in poverty, discrimination, gender-based violence, armed conflicts, climate change and natural disasters, pushing people to leave their home countries and seek new opportunities through migration, thus making them vulnerable to exploitation and trafficking. The recently observed increase in the number of cases of trafficking for labour exploitation puts pressure on local and regional authorities and services to specifically address this form of trafficking.

In its resolution, the Congress invites local and regional authorities to implement outreach programmes for at-risk populations, including protection measures for unaccompanied and separated migrant children. It also calls for the development of campaigns and training on the risks and signs of human trafficking, the establishment of low-threshold support services for victims and potential victims and the enforcement of ethical procurement policies ensuring that public contracting processes of cities and regions are free from labour exploitation. In its recommendation, the Congress invites the national governments of member states to enhance the vertical coordination of anti-trafficking actions, to foster the collection and sharing of disaggregated data and to back up victim support programmes by providing funding to multidisciplinary anti-trafficking networks at local and regional levels.

<sup>1</sup> L: Chamber of Local Authorities / R: Chamber of Regions.  
EPP/CCE: European People's Party Group in the Congress.  
SOC/G/PD: Group of Socialists, Greens and Progressive Democrats.  
ILDG: Independent Liberal and Democratic Group.  
ECR: European Conservatives and Reformists Group.  
NR: Members not belonging to a political group of the Congress

## RESOLUTION 510 (2025)<sup>2</sup>

1. The Congress of Local and Regional Authorities of the Council of Europe refers to:

- a. the explanatory memorandum “Empowering cities and regions to combat human trafficking for labour exploitation” (CG(2025)48-13);
- b. Congress Resolution 196 (2005) “The fight against trafficking in human beings and their sexual exploitation: the role of cities and regions”, and the Declaration on the fight against trafficking in human beings, opened for signature during the 13th Plenary Session of the Congress in 2006;
- c. the Council of Europe’s Convention on Action against Trafficking in Human Beings (CETS No.197);
- d. the Reykjavik Declaration adopted at the 4th Summit of Heads of State and Government of the Council of Europe (2023), which recalls the necessity of fighting trafficking in human beings;
- e. Recommendation CM/Rec(2022)21 of the Committee of Ministers on preventing and combatting trafficking in human beings for the purpose of labour exploitation and its explanatory memorandum asking member States to facilitate multi-agency and multi-disciplinary co-operation with regional and local authorities to combat trafficking in human beings for the purpose of labour exploitation;
- f. the work developed by the Council of Europe Group of Experts on Action against Trafficking in Human Beings, notably the “Guidance note on preventing and combatting trafficking in human beings for the purpose of labour exploitation” (GRETA(2020)12), and the “Compendium of good practices in addressing trafficking in human beings for the purpose of labour exploitation” (GRETA(2020)08);
- g. Parliamentary Assembly Resolution 2536 (2024) “Precarious and irregular work situations of migrant seasonal and domestic workers”;
- h. the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda for Sustainable Development, specifically Goal 8 on decent work and economic growth, and its Target 8.7 to eradicate forced labor, modern slavery, and human trafficking.

2. The Congress notes with concern that:

- a. trafficking in human beings for the purpose of labour exploitation has been on the rise in many Council of Europe member States, particularly affecting vulnerable populations who are often exploited in sectors including agriculture, construction and domestic work;
- b. children, especially unaccompanied and separated migrant children, are increasingly exposed to human trafficking, notably in a context of conflict, economic hardship, family disfunction and inadequate child protection measures;
- c. human trafficking has a profoundly negative impact on local communities, undermining the enjoyment of human rights and social cohesion, perpetuating poverty and contributing to the normalisation of exploitative labour practices, not only harming the victims but also destabilising local and regional economies and straining public services;
- d. human trafficking should be a key issue on local and regional authorities’ agendas as it occurs within their jurisdictions, exploiting local infrastructures and regulations and affecting residents directly, and as they are the level of governance most likely to be able to identify and provide support to potential victims and vulnerable populations;
- e. local and regional authorities, despite being the first point of contact for many victims of trafficking, frequently lack the necessary resources, training and coordination mechanisms to effectively prevent and combat human trafficking, including for the purpose of labour exploitation;

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<sup>2</sup> Debated and adopted by the Congress during the 48<sup>th</sup> Session on 26 March 2025 (see document CG(2025)48-13, explanatory memorandum, co-rapporteurs Cecilia DALMAN EEK, Sweden (R, SOC/G/PD) and Martine DIESCHBURG-NICKELS, Luxembourg (L, ILDG).

f. victims of human trafficking, including for the purpose of labour exploitation, face significant barriers to accessing legal, psychological and social support systems, especially in smaller municipalities and rural areas where such services may be scarce, impacting the likelihood of reporting and identification of victims;

g. the social and economic harm caused by human trafficking, including for the purpose of labour exploitation, necessitates a robust response at local and regional levels, including the involvement of local businesses, civil society and community members to combat these practices and support the reintegration of victims;

h. the complex and organised nature of human trafficking networks require a coordinated, multi-level approach that integrates local, regional and national efforts to dismantle these networks and provide support to victims.

3. The Congress calls on local and regional authorities in member States to:

a. place the fight against human trafficking high on the political agenda of local and regional councils, by adopting a comprehensive human-rights based strategy that puts victims at the centre of all efforts aimed at protecting, assisting and providing redress, and refraining from using rhetoric that criminalises victims of human trafficking;

b. enhance efforts to prevent human trafficking for the purpose of labour exploitation through the development and implementation of outreach programmes for at-risk populations, including effective protection measures for unaccompanied and separated children in a context of migration, as well as targeted information campaigns and training about the risks and signs of human trafficking for labour exploitation aimed at political representatives, public servants, employers and civil society organisations who are likely come in contact with potential victims;

c. make use of zoning and licensing regulations and other procedures to erect administrative and financial barriers that disrupt the logistical processes used by human traffickers and exploiters and prevent the establishment of trafficking practices;

d. implement and enforce ethical procurement policies that ensure the supply chains of cities and regions are free from labour exploitation, in collaboration with trade unions, NGOs, and other stakeholders, and monitor compliance and take action against violations, including in public contracting processes;

e. improve detection and referral systems through the establishment of low-threshold services and mobile outreach teams, using risk-profiling to identify at-risk sites or sectors, and ensure the existence of safe, multilingual reporting pathways that protect victims from retaliation or further exploitation;

f. strengthen assistance to victims and potential victims of human trafficking, including for the purpose of labour exploitation, by establishing regional contact points that can offer support to local services dealing with trafficking cases and by setting up intermunicipal collaboration structures to pool specialised services and to standardise practices with a view to ensuring consistent care to victims;

g. establish or strengthen local and regional anti-trafficking networks and multidisciplinary teams that facilitate the exchange of information, the organisation of joint inspections and the coordination of actions among various stakeholders and across different levels of government.

4. The Congress calls on national associations of local and regional authorities to:

a. support capacity-building amongst their members by developing training and resources for local and regional authorities on the prevention and detection of human trafficking, with a specific focus on human trafficking for the purpose of labour exploitation;

b. advocate for policy consistency by engaging with national governments to ensure that anti-trafficking policies, particularly those addressing labour exploitation, are coherent across all levels of government and that local and regional authorities are adequately supported and involved in national decision-making processes regarding the fight against human trafficking.

## **RECOMMENDATION 527 (2025)<sup>3</sup>**

1. The Congress of Local and Regional Authorities of the Council of Europe refers to:
  - a. the explanatory memorandum “Empowering cities and regions to combat human trafficking for labour exploitation” (CG(2025)48-13);
  - b. Congress Recommendation 165 (2005) “The fight against trafficking in human beings and their sexual exploitation: the role of cities and regions”, and the Declaration on the fight against trafficking in human beings, opened for signature during the 13th Plenary Session of the Congress in 2006;
  - c. the Council of Europe’s Convention on Action against Trafficking in Human Beings (CETS No.197);
  - d. the Reykjavik Declaration adopted at the 4th Summit of Heads of State and Government of the Council of Europe (2023), which recalls the necessity of fighting trafficking in human beings;
  - e. Recommendation CM/Rec(2022)21 of the Committee of Ministers on preventing and combatting trafficking in human beings for the purpose of labour exploitation and its explanatory memorandum asking member States to facilitate multi-agency and multi-disciplinary co-operation with regional and local authorities to combat trafficking in human beings for the purpose of labour exploitation;
  - f. the work developed by the Council of Europe Group of Experts on Action against Trafficking in Human Beings, notably the “Guidance note on preventing and combatting trafficking in human beings for the purpose of labour exploitation” (GRETA(2020)12), and the “Compendium of good practices in addressing trafficking in human beings for the purpose of labour exploitation” (GRETA(2020)08);
  - g. Parliamentary Assembly Resolution 2536 (2024) of the “Precarious and irregular work situations of migrant seasonal and domestic workers”;
  - h. the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda for Sustainable Development, specifically Goal 8 on decent work and economic growth, and its Target 8.7 to eradicate forced labor, modern slavery, and human trafficking.
2. The Congress notes with concern that:
  - a. trafficking in human beings for the purpose of labour exploitation has been on the rise in many Council of Europe member States, particularly affecting vulnerable populations who are often exploited in sectors including agriculture, construction and domestic work;
  - b. children, especially unaccompanied and separated migrant children, are increasingly exposed to human trafficking, notably in a context of conflict, economic hardship, family disfunction and inadequate child protection measures;
  - c. human trafficking has a profoundly negative impact on local communities, undermining the enjoyment of human rights and social cohesion, perpetuating poverty and contributing to the normalisation of exploitative labour practices, not only harming the victims but also destabilising local and regional economies and straining public services;
  - d. human trafficking should be a key issue on local and regional authorities’ agendas as it occurs within their jurisdictions, exploiting local infrastructures and regulations and affecting residents directly, and as they are the level of governance most likely to be able to identify and provide support to potential victims and vulnerable populations;
  - e. local and regional authorities, despite being the first point of contact for many victims of trafficking, frequently lack the necessary resources, training and coordination mechanisms to effectively prevent and combat human trafficking, including for the purpose of labour exploitation;

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<sup>3</sup> Debated and adopted by the Congress during the 48<sup>th</sup> Session on 26 March 2025 (see document CG(2025)48-13, explanatory memorandum, co-rapporteurs Cecilia DALMAN EEK, Sweden (R, SOC/G/PD) and Martine DIESCHBURG-NICKELS, Luxembourg (L, ILDG).

f. victims of human trafficking, including for the purpose of labour exploitation, face significant barriers to accessing legal, psychological and social support systems, especially in smaller municipalities and rural areas where such services may be scarce, impacting the likelihood of reporting and identification of victims;

g. the social and economic harm caused by human trafficking, including for the purpose of labour exploitation, necessitates a robust response at local and regional levels, including the involvement of local businesses, civil society and community members to combat these practices and support the reintegration of victims;

h. the complex and organised nature of human trafficking networks require a coordinated, multi-level approach that integrates local, regional and national efforts to dismantle these networks and provide support to victims.

3. The Congress asks the Committee of Ministers to invite the respective national authorities of the member States of the Council of Europe to:

a. enhance vertical coordination by ensuring that national anti-trafficking actions and strategies are developed in consultation with local and regional authorities and their associations and by providing clear guidance on the implementation of new actions;

b. promote and support the collection and sharing of disaggregated data on confirmed and suspected cases of human trafficking, including for the purpose of labour exploitation, by actors and services involved at all levels in order to obtain a comprehensive picture of the state of human trafficking and high-risk areas across the territory;

c. develop a coherent national approach to anti-trafficking efforts that clearly defines the duties and mandates of different authorities, prioritises human rights and victim protection, and encourages safe reporting, particularly for undocumented migrants, unaccompanied and separated children and other persons in precarious situations, ensuring that authorities at different levels of governance receive the means and support needed to carry out their responsibilities;

d. support the improvement of assistance to victims and potential victims by facilitating the creation of multidisciplinary networks and teams at local and regional levels, ensuring they have adequate funding and means to provide specialised support to victims and offer low-threshold outreach services to vulnerable populations.

**EXPLANATORY MEMORANDUM****Empowering cities and regions to combat human trafficking for labour exploitation****Table of Contents**

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## 1. INTRODUCTION<sup>4</sup>

1. Trafficking in human beings is a crime that violates some of the most fundamental human rights, including the right to life, as well as the prohibition of slavery and forced labour and the right to liberty (Articles 2, 4 and 5 of the European Convention on Human Rights).

2. Trafficking occurs all over the world and is rooted in global inequalities of distribution of wealth and power. Poverty, discrimination, gender-based violence, unemployment, armed conflicts, climate change and natural disasters in their home countries push people to migrate and to seek new opportunities, which may lead to situations of vulnerability, exploitation and trafficking.

3. Human trafficking is an international phenomenon, often linked to organised crime. As such, it could be thought of as a problem to be tackled primarily by national authorities and via international co-operation. However, human trafficking is also a matter of rule of law and human rights; as such, it also concerns local and regional authorities. Combatting human trafficking therefore requires concrete actions by elected officials and services at local and regional levels, both when it comes to prevention and to victim identification and support. Accordingly, for local and regional authorities, the fight against human trafficking should be seen as a quintessentially local and inherently rights-based issue.

4. The Congress has previously outlined the key role of local and regional authorities in the fight against trafficking in its 2005 report “The fight against trafficking in human beings and their sexual exploitation: the role of cities and regions”<sup>5</sup> underlining notably their role in the social domain, and in its 2006 Declaration on the fight against trafficking in human beings,<sup>6</sup> in which it called on member States to sign and ratify the 2005 Convention on Action against Trafficking in Human Beings. The Congress’ previous work on the matter focused on trafficking for sexual exploitation, as the most prevalent form of trafficking in Europe.

5. However, since then, an increase in the number of cases of trafficking for labour exploitation have been observed all around Europe.<sup>7</sup> This growing trend puts pressure on local and regional elected officials to address and prevent trafficking for labour exploitation in their communities, to improve the identification of and provision of support to potential victims, and to strengthen the coordination of different municipal or regional services to combat trafficking.

6. To support local and regional authorities in dealing with this new trend and to work towards the protection of victims of human trafficking, this report will explore their role in combatting trafficking in human beings, with a specific focus on trafficking for labour exploitation purposes.

7. It aims to identify the key challenges that local and regional authorities face in their anti-trafficking work, but also to provide some examples of promising practices and innovative approaches that have been developed as a response. A special focus on labour exploitation is provided under each section to highlight key issues and opportunities to strengthen local action against labour exploitation.

8. This report is grounded in a human rights-based approach, which means that the rights of victims of trafficking are placed at the centre of all efforts to prevent and combat trafficking and to protect, assist and provide redress to victims. Moreover, the report advocates for a victim-centred, trauma-informed approach in the work of local and regional authorities. This is a way of engaging with victims that prioritises listening, avoids re-traumatisation, and systematically focuses on the person’s safety, rights, well-being, expressed needs and choices.<sup>8</sup>

<sup>4</sup> This explanatory memorandum is based on the contribution prepared by Anniina Jokinen, Senior Programme Officer, European Institute for Crime Prevention and Control (HEUNI), Finland. The written contribution is available from the Secretariat upon request.

<sup>5</sup> Congress of Local and Regional Authorities of the Council of Europe (2005), [The fight against trafficking in human beings and their sexual exploitation: the role of cities and regions](#).

<sup>6</sup> Council of Europe (2005), [Declaration on the fight against trafficking in human beings](#).

<sup>7</sup> Eurostat (2024), “[10 093 registered victims of human trafficking in 2022](#)”; See also GRETA (2017), “[Thematic Chapter of the 7th General Report on GRETA’s Activities: Human trafficking for the purpose of labour exploitation](#)”, Council of Europe, Strasbourg, p. 38.

<sup>8</sup> UNHCR – The UN Refugee Agency (2020), [Policy on a Victim-Centred Approach in UNHCR’s response to Sexual Misconduct](#).

9. This focus is in line with the recent work of the Council of Europe in addressing trafficking for labour exploitation. In 2019, the Secretary General presented to the Committee of Ministers a Roadmap on strengthening action against trafficking in human beings for the purpose of labour exploitation.<sup>9</sup> In accordance with this Roadmap, the Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA) adopted, in 2020, a compendium of good practices in the area of combating human trafficking for the purpose of labour exploitation, which includes examples from the local level.<sup>10</sup> The compendium served as a basis for the elaboration of a Guidance Note on preventing and combating human trafficking for the purpose of labour exploitation, which GRETA adopted at the end of 2020.<sup>11</sup>

10. Furthermore, in 2022, the Council of Europe Committee of Ministers adopted Recommendation CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, which calls on Council of Europe member States to adopt national laws, policies and strategies which address trafficking for the purpose of labour exploitation.<sup>12</sup> The CM Recommendation does not directly address local and regional authorities and their role, but it requires member States to widely disseminate the recommendation and its Explanatory memorandum among the competent authorities and stakeholders at national, regional and local levels. The Explanatory memorandum calls upon member States to facilitate multi-agency and multi-disciplinary co-operation with regional and local authorities.

11. This was reiterated by the "Reykjavik Declaration", adopted at the 4th Summit of Heads of State and Government of the Council of Europe in May 2023, which recalls the necessity to fight trafficking and commits to intensifying efforts to foster and improve international co-operation in this regard.<sup>13</sup>

12. The present report aims to facilitate this process by giving concrete examples of existing solutions developed to address various trafficking related challenges in Council of Europe member States and by making action-oriented recommendations for local and regional authorities to use in their work against trafficking, and labour exploitation in particular.

13. It will also contribute to the achievement of the UN Sustainable Development Goals (SDGs), in particular SDG8 "Good jobs and economic growth" and its target 8.7 "Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour".

## 2. INTERNATIONAL STANDARDS ON TRAFFICKING IN HUMAN BEINGS

14. The UN Trafficking Protocol ("Palermo Protocol") is the principal international legal instrument to prevent, suppress and punish human trafficking, especially in women and children.<sup>14</sup> It supplements the United Nations Convention against Transnational Organized Crime, and is currently ratified by 181 States around the world, including all Council of Europe member States.<sup>15</sup>

15. According to the Palermo Protocol, "Trafficking in persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

<sup>9</sup> Council of Europe (2019), [Roadmap on strengthening action against trafficking in human beings for the purpose of labour exploitation](#).

<sup>10</sup> GRETA - The Group of Experts on Action against Trafficking in Human Beings (2020a), [Compendium of good practices in addressing trafficking in human beings for the purpose of labour exploitation](#), Council of Europe, Strasbourg.

<sup>11</sup> GRETA (2020b), [Guidance note on preventing and combatting trafficking in human beings for the purpose of labour exploitation](#), Council of Europe, Strasbourg.

<sup>12</sup> Committee of Ministers of the Council of Europe (2022), "[Recommendation CM/Rec\(2022\)21](#)".

<sup>13</sup> Council of Europe (2023), [United around our values - Reykjavik declaration](#).

<sup>14</sup> United Nations Human Rights office of the High Commissioner (2000), [Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children](#).

<sup>15</sup> United Nations Treaty Collection (2000), [Suppress and Punish Trafficking in Persons, Especially Women and Children](#).

16. The 2005 Council of Europe Convention on Action against Trafficking uses the same definition of trafficking in human beings as the Palermo Protocol. The Council of Europe Anti-Trafficking Convention establishes further obligations for States to prevent trafficking, design a comprehensive framework for the protection and assistance of victims and witnesses, and ensure effective investigation and prosecution following a human-rights based and victim-centred approach.<sup>16</sup> The Convention provides for a series of rights for trafficked persons, in particular the right to be identified as a victim, to be assisted in their recovery, to be given a recovery and reflection period as well as a renewable residence permit, and to receive compensation for the damages suffered. The Convention entered into force on 1 February 2008, following its 10<sup>th</sup> ratification and has been ratified by all 46 member States of the Council of Europe, as well as by two non-member States, Belarus and Israel.<sup>17</sup>

17. In 2011, the EU Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims expanded the definition of human trafficking by including additional forms of exploitation (forced begging and forced criminal activities).

18. On 23 April 2024, the European Parliament voted in favour of an amended Directive which broadens the EU's actions against human trafficking and criminalises new forms of exploitation such as forced marriage, illegal adoption, and the exploitation of surrogacy. The directive also broadens the scope for law enforcement to dismantle criminal organisations and foresees penalties for companies convicted of trafficking, for instance by excluding them from tendering processes and from reimbursement for public aid or subsidies.<sup>18</sup> EU member States have two years to implement its provisions.<sup>19</sup>

### 3. FOCUS ON LABOUR EXPLOITATION AMONGST VARIOUS FORMS OF TRAFFICKING AND EXPLOITATION

19. Trafficking in human beings is a multifaceted phenomenon which entails various forms of exploitation. They include the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour and services, slavery or practices similar to slavery, servitude, the removal of organs, forced begging, forced criminal activities (such as stealing, drug cultivation, selling counterfeit goods or benefit fraud), forced marriage, illegal adoption, and surrogacy for purposes of exploitation.

20. Child trafficking involves the use of children for the purpose of exploitation in different forms.<sup>20</sup> Conflict, economic challenges, family dysfunction and inadequate child protection measures make children, especially unaccompanied and separated migrant children, increasingly vulnerable to trafficking.<sup>21</sup> According to the UNODC 2022 Global Trafficking report, around a third of the victims of trafficking identified globally are children.<sup>22</sup> Children are also nearly twice as likely to suffer extreme violence from traffickers compared to adult victims, with an even higher rate for girls.<sup>23</sup>

21. Human trafficking overall is a gendered phenomenon which impacts women and girls in particular. Trafficking in women and girls has been described as a structural form of violence against women.<sup>24</sup> While women and girls are most often subjected to trafficking for sexual exploitation, men and boys are more likely to be exploited for their labour. However, the boundaries are becoming more blurred, and victims may be exploited for multiple purposes, e.g., both for sexual and labour exploitation purposes or for forced criminal activities and benefit fraud.

22. Whilst addressing various types of human trafficking, this report will focus on trafficking for the purpose of labour exploitation. The concept of "labour exploitation" in the context of human trafficking covers at a minimum forced labour or services, slavery or practices similar to slavery, and servitude,

<sup>16</sup> Council of Europe (2005), [Convention on Action against Trafficking in Human Beings](#).

<sup>17</sup> Council of Europe Treaty Office, [Chart of signatures and ratifications of Treaty 197](#).

<sup>18</sup> European Parliament News, ["Trafficking in human beings: MEPs adopt more extensive law to protect victims"](#), 23 April 2024.

<sup>19</sup> Council of the European Union (2024), ["Fight against human trafficking: Council strengthens rules"](#).

<sup>20</sup> GRETA (2018), ["Trafficking in children. Thematic Chapter of the 6th General Report on GRETA's Activities"](#), Council of Europe, Strasbourg.

<sup>21</sup> Ibid.

<sup>22</sup> UNODC - United Nations Office on Drugs and Crime UNODC (2022), [Global Report on Trafficking in Persons 2022](#), p. 25.

<sup>23</sup> UNODC (2024), [Explainer: Understanding Child Trafficking](#).

<sup>24</sup> EIGE - European Institute for Gender Equality (2018), [Gender-specific measures in anti-trafficking actions: report](#), Publications Office of European Union, Luxembourg.

which are defined and prohibited by international law, including in the case law of the European Court of Human Rights regarding Article 4 of the European Convention on Human Rights (ECHR).<sup>25</sup>

23. Forced or compulsory labour is defined in Article 2(1) of the International Labour Organization (ILO) Convention concerning Forced or Compulsory Labour (No. 29 of 1930) as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”.<sup>26</sup> This menace of a penalty, according to ILO, refers to any penalty or punishment inflicted by any person or body, and can take many different forms ranging from physical violence or restraint, or even death threats addressed to the victim or relatives to more subtler forms of menace. Other penalties can be of financial nature, including economic penalties which are linked to debts. Employers can also require workers to hand over their identity documents and may use the threat of confiscation of these documents in order to exact forced labour.<sup>27</sup>

24. Labour exploitation is made possible and legitimised through existing poor labour practices that affect migrant workers in particular.<sup>28</sup> They face exploitative recruitment and employment practices, especially in low-paid, low-skilled jobs. Perpetrators use different legal and illegal schemes such as bogus self-employment, posting of workers and cascade sub-contracting to conceal their activities and to maximise their profits.<sup>29</sup> The business model of labour exploitation is based on underpaying the workers, avoiding taxes and other statutory payments, and also charging excessive costs from the employees for recruitment/placement, accommodation, transport and tools.<sup>30</sup>

25. Labour exploitation is found particularly frequently in labour-intensive sectors such as catering, cleaning, agriculture, construction and manufacturing.<sup>31</sup> The risk of exploitation increases in situations where complex subcontracting chains and different outsourcing or recruitment arrangements are used to employ part-time, project-specific, or seasonal workers. Victims may also be forced to sign paperwork for fraudulent companies established in their name, to get loans or credits cards or to apply for benefits in their name. These are collected by the traffickers to maximise their profits.<sup>32</sup>

26. A phenomenon often linked to or confused with human trafficking is the smuggling of migrants. The rapporteurs therefore find it important to underline the difference, as well as possible connections between both phenomena in order to ensure that local and regional authorities have a good understanding of the issue they are tackling. It is also important to install clarity so as to avoid that victims of trafficking fall victim to polarising rhetoric around migration issues, potentially leading to them being punished for illegal acts they were forced to commit by traffickers, rather than being identified as victims and afforded the protection they are entitled to under the Council of Europe Anti-Trafficking Convention. Elected officials in particular have a responsibility to adopt a victim-centred approach and to refrain from criminalising victims of human trafficking to play into wider societal polarisation.

27. Smuggling of migrants refers to the procurement of the illegal entry of a person into a State Party of which the person is not a national or a permanent resident in order to obtain, directly or indirectly, a financial or other material benefit. In practice, smuggling involves irregular border crossing and entry into another state, and the relationship between smuggler and migrant is based on a commercial transaction, which is supposed to end after the border crossing.<sup>33</sup>

28. In general discussions, human trafficking and the smuggling of migrants sometimes become conflated. Differentiating between trafficking and smuggling may be challenging, but there are some very clear differences between these two crimes. Smuggling is a crime against the State, while human trafficking is a crime against the person. Contrary to smuggling, which involves crossing borders,

<sup>25</sup> GRETA (2020), [Guidance Note on preventing and combatting trafficking in human beings for the purpose of labour exploitation](#), Council of Europe, Strasbourg, paragraphs 5-6, 11.

<sup>26</sup> ILO - International Labour Organization, [Convention C029 - Forced Labour Convention, 1930 \(No. 29\)](#).

<sup>27</sup> ILO (2009), The cost of coercion, Global report under the follow-up to the ILO Declaration on Fundamental Principles and Rights at Work, Report of the Director-General, International Labour Conference 98th Session 2009, Report I (B), ILO, Geneva, pp. 5-6.

<sup>28</sup> Ollus N. (2016), [From Forced Flexibility to Forced Labour: The Exploitation of Migrant Workers in Finland](#), HEUNI, Helsinki.

<sup>29</sup> Jokinen A. & Ollus N. (2019), [Shady business. Uncovering the business model of labour exploitation](#), HEUNI, Helsinki.

<sup>30</sup> Ibid.

<sup>31</sup> IOM - International Organization for Migration (2023a), [Mapping Risks to Migrant Workers in Supply Chains in Europe](#), IOM, Brussels; FRA – European Union Agency for Fundamental Rights (2019), [Protecting Migrant Workers from Exploitation in the EU: Workers' Perspectives](#), FRA, Vienna.

<sup>32</sup> Pekkarinen A. and Jokinen A. (2023), [Patterns Of Exploitation](#), HEUNI, Helsinki.

<sup>33</sup> ICAT – The Inter-Agency Coordination Group against Trafficking in Persons (2016), [“What is the difference between trafficking in persons and smuggling of migrants”](#).

trafficking can occur within national borders and concern national of the states in which it takes place. Trafficking usually involves continued exploitation that generates a financial or other benefit for the trafficker. However, there are also commonalities as both types of criminality can involve organised crime and they can occur along the same routes and even be perpetrated by the same persons.<sup>34</sup> Sometimes a situation of smuggling can evolve into trafficking if the smuggler after the crossing of the border demands work or services of the person or places the person in a situation of debt-bondage.

29. Lack of regular channels for migration can result in people having to resort to using the services of smugglers and facilitators at a high price, which increases their risk of becoming trafficked. They may have to fund the services of smugglers by means of labour or sexual exploitation along the migration route.<sup>35</sup>

#### 4. IMPLICATIONS AT LOCAL AND REGIONAL LEVELS: TRENDS, IMPACT AND RESPONSIBILITIES

##### 4.1. Current trends in trafficking in human beings in Council of Europe member States

30. Human trafficking often remains undetected, and its victims are not identified as such because they are afraid to report to the authorities. Typically, victims of trafficking are identified by non-governmental organisations as well local actors and organisations working on the grass-root level and providing low threshold services. However, victims are often reluctant to self-identify because they are afraid, traumatized and threatened by the perpetrators. This means that a large share of human trafficking offences is not reported to the authorities and therefore likely to go undetected.

31. Moreover, the number of human trafficking cases and victims identified by authorities depends on the availability of appropriately trained and sufficiently resourced law enforcement and other public agencies, but does not necessarily portray the actual prevalence of the crime.<sup>36</sup> In many countries, different authorities and non-governmental organisations working in the field collect their own data, but there is rarely centralised data collection in place using a solid and transparent methodology.

32. According to the most recent EUROSTAT 2022 statistics for trafficking in human beings, 10,093 victims of trafficking in human beings were registered in the EU in 2022, representing a 41% increase compared to 2021.<sup>37</sup> More than half of all the registered victims in the EU were women and girls (63%). Children made up 15% of the victims. The share of EU nationals among the registered victims is 37%.<sup>38</sup>

33. The number of registered victims for labour exploitation is showing an increasing trend and is almost equal to that of sexual exploitation, both amounting to 41 % of the total number of victims. Trafficking for other purposes (criminal activities, forced begging, organ removal and other forms) accounted for 18% of all trafficking victims.<sup>39</sup> The number of suspected traffickers decreased by 16% and the number of convicted traffickers decreased by almost 17% in 2022 compared to 2021.<sup>40</sup>

34. According to the 2022 UNODC global trafficking report (based on data from 2017-2020), there was a 41 % increase in male victims detected in the region of Eastern Europe and Central Asia. At the same time there was a 24 % decrease in the number of female victims detected. Also, a severe slowdown of the criminal justice response to trafficking was recorded in 2020 because of the COVID-19 pandemic. In the region of Central and South-Eastern Europe, there was continued increase in the detection of victims of trafficking, and the region also recorded an increase in convictions in 2020.<sup>41</sup>

35. In general, trafficking for labour exploitation remains underreported.<sup>42</sup> The European Union Agency for Fundamental Rights (FRA) interviewed exploited migrant workers and found that most commonly the workers had encountered very little or no pay for very long working hours; working conditions that violate labour standards and compromise (especially irregular) migrant workers' health and safety, with access to medical care often denied by employers to avoid detection by authorities; lack of a contract

<sup>34</sup> Ibid.

<sup>35</sup> Healy C. (2019), *The Strength to Carry On: Resilience and Vulnerability to Trafficking and Other Abuses among People Travelling along Migration Routes to Europe*, ICMPD, Vienna.

<sup>36</sup> Pekkarinen A. and Jokinen A. (2023).

<sup>37</sup> European Commission (2024), ["Newly released data show an increase of trafficking in human beings"](#).

<sup>38</sup> Ibid.

<sup>39</sup> Eurostat (2024), ["Forms of exploitation for registered victims of trafficking in human beings"](#).

<sup>40</sup> Eurostat (2024), ["Trafficking in human beings statistics"](#).

<sup>41</sup> UNODC (2022), [Global Report on Trafficking in Persons 2022](#).

<sup>42</sup> IOM (2023a). [Mapping Risks to Migrant Workers in Supply Chains in Europe](#).

or a contract provided in a language that the worker did not understand; and, accommodation provided by the employer in unsanitary or degrading conditions.<sup>43</sup>

36. According to most recent ILO estimations, the underpayment of the workers results in over \$236 billion in profits for their exploiters globally, and \$84.2 billion in Europe and Central Asia. Evidence also suggests that substantial additional profits are generated through the unlawful recruitment practices that victims of labour exploitation are often faced with. Estimated illegal profits amount to \$21,248 per victim in Europe and Central Asia.<sup>44</sup>

#### **4.2. The impact of trafficking at subnational and community levels**

37. Human trafficking has specific implications for regional authorities, cities, and municipalities. Concretely, victims of trafficking are recruited, transported and harboured in local areas and neighbourhoods. Victims are recruited for example in transportation hubs, asylum centres and homeless shelters. They are also exploited at the local level, in local businesses ranging from hotels, restaurants, shops, kiosks, bars and nail salons to for example car washes, farms, construction sites, factories and shipyards as well as private homes.

38. If this kind of criminality is left unaddressed at the local level, it may firstly lead to larger challenges with the establishment of serious and organized crime at the local and regional levels. Secondly, it leads to impunity and can create a breeding ground for further exploitation and trafficking. Traffickers and exploiters are able to identify the gaps in the local approach and may take advantage of these. A lack of responses to trafficking at the local level can lead and to increased recruitment of a particular vulnerable group or population, such as undocumented migrants, Roma, asylum seekers, homeless people or at-risk youth.

39. Examples have shown that if exploitative labour practices become normalised within certain sectors at the local level, it may have broader effects for the region at large, e.g., in terms of challenges for the integration of migrant workers and their families.<sup>45</sup> This, in turn, may affect the realisation of children's rights, and pose challenges for the social, health, welfare and education services at the municipal level.

#### **4.3. Roles and responsibilities of local and regional authorities**

40. While the Council of Europe Anti-Trafficking Convention does not explicitly mention the role of local and regional authorities, States' international obligations to protect the human rights of every person within their jurisdiction apply to all levels and branches of government. As a matter of fact, one of the four core principles of action under the Convention is "partnership", obliging States to cooperate not only at the international level, but also at the national one, including with local and regional actors.

41. Many of the areas that are crucial to combatting trafficking in human beings fall under the jurisdiction of local and regional authorities, in particular in member States where a trend towards decentralisation can be observed. As such, they not only have the responsibility to contribute to the fight against trafficking, but also the opportunity to do so. Local and regional authorities are often placed in the position of first responders, as they come across potential victims, refer them to support services and/or provide such services, depending on the national system in place. The chapter below outlines in more detail which capacities local and regional authorities have in relation to different aspects of the fight against trafficking.

42. It is crucial to raise awareness among local and regional elected officials about their role and their potential to develop victim-centred, human-rights policies that can make a real difference in the lives of victims of trafficking. In parallel to increasing political awareness and will to take local action against trafficking, there is a need to strengthen the capacity of local and regional services to implement such policies and to address trafficking in more systemic ways.

43. Yet, despite their central role in detecting potential victims and/or cases of trafficking, in many countries local and regional authorities are not adequately acknowledged in national and regional

<sup>43</sup> FRA (2019).

<sup>44</sup> ILO (2024), [Profits and poverty: The economics of forced labour](#), p. 14.

<sup>45</sup> E.g. Ethical Consumer (2023), [Produce of Exploitation](#); Työ- ja elinkeinoministeriö (2023), [Alueellinen resilienssi ja työperusteinen maahanmuutto: Kasvihuoneeteollisuuden ulkomainen työvoima Närpiön seudulla](#), TEM, Helsinki.

strategies against human trafficking. As a result, there is often a lack of coherence between action at the local, regional and national levels, leading to significant differences in the capacity, knowledge and resources of local actors in dealing with human trafficking cases both within and between countries and specific regions.<sup>46</sup>

44. There are many practices and instruments at the local level that could be used to address trafficking and support victims, but they are not often fully utilised in the work against human trafficking.<sup>47</sup> These include for example mobile and low-threshold services targeting local residents, migrants and mobile populations, information and awareness raising campaigns, as well as enforcement of different regulatory, licensing and zoning regulations which could be utilised to interrupt or inhibit unscrupulous businesses exploiting administrative processes.

45. Conflicting interests and responsibilities of different local actors could also hamper the effectiveness of efforts to combat human trafficking. For example, police may be more focused on criminal investigations while NGOs are likely to prioritize the victims' interests. Moreover, actors at the local level may lack explicit anti-trafficking policies or strategies in place, or do not recognise the linkages between various social challenges and the risks of trafficking. Victims of trafficking may be encountered in various social, health, employment and education services, but identification of trafficking may be lacking, and thus the experience of the victims may remain unaddressed or be addressed as a different phenomenon (i.e. a health concern or an issue of violence).

46. The EU Strategy on Combatting Trafficking in Human Beings 2021-2025 makes an explicit mention of the role of towns and regions. It encourages co-operation between relevant national authorities and regions, cities and municipalities, including by developing and sharing knowledge and information, both at the policy and operational levels. The strategy encourages co-operation between relevant national and local authorities and regions, cities and municipalities.<sup>48</sup> It also outlines the need for a strengthened criminal justice response to trafficking for labour exploitation, also by involving the regional and local levels, notably with a view to supporting efforts to increase the detection of victims and the reporting of the crime to the authorities. Furthermore, the EU Gender Equality Strategy 2020-2025 states that countering the impunity of users, exploiters and profit-makers in trafficking is a priority issue, and that the concerns of women and girls affected by trafficking must be at the centre of policy development.<sup>49</sup>

## 5. CHALLENGES AND SOLUTIONS

47. This report was prepared with the support of and in close collaboration with the Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA) and with its Secretariat. The analysis of GRETA's country reports, allowed for the identification of three procedural matters and one transversal issue were, which pose challenges and opportunities for local and regional authorities in the fight against trafficking, namely (1) prevention, (2) outreach, detection and referral of victims, (3) assistance to victims, and (4) coordination of anti-trafficking action. These four points are further elaborated below, looking into the role of local and regional authorities in the matter, challenges they may face and potential solutions illustrated by good practice examples with a special focus on practices aimed at combatting trafficking for the purpose of labour exploitation. The report proposes concrete actions for local and regional authorities to address each of these challenges.<sup>50</sup>

### 5.1. Prevention

48. Prevention of human trafficking involves actions at several levels (education, awareness raising, information, research) and should also tackle multiple and interlinked factors that contribute or enable exploitation, such as discrimination, social exclusion, weak rule of law, poor social protection, poor monitoring of labour laws, lack of employment and educational opportunities, as well as lack of legal

<sup>46</sup> CBSS – Council of the Baltic Sea States (2016), [Guidelines for Municipalities -Stepping Up Action against Human Trafficking](#). CBSS, Stockholm,

<sup>47</sup> Ibid.

<sup>48</sup> European Commission (2021), [Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee of the regions on the EU strategy on Combatting Trafficking in Human Beings 2021-2025](#).

<sup>49</sup> European Commission (2020), [The Gender Equality Strategy 2020-2025](#).

<sup>50</sup> The rapporteurs wish to thank GRETA President Helga Gayer for her participation in the exchange of views with the Current Affairs Committee (predecessor committee of the Social Inclusion Committee until March 2024) in June 2023, and for the subsequent preparation of an overview of local and regional practices identified through monitoring activities by the GRETA secretariat; both contributions have been instrumental in preparing this report.

<sup>50</sup> CBSS (2016), p. 53.

and safe migration channels.<sup>51</sup> Local and regional authorities can play an active role in the prevention of trafficking in human beings through the gathering of information on key groups at risk and identifying areas in which they can be reached.

49. Understanding the local situation, factors that contribute to exploitation, as well as detecting risk areas allows for a targeted approach adapted to local realities. Ideally, cities and municipalities should have strategies towards prevention of violence and exploitation, which includes actions against human trafficking, and which are mainstreamed into all existing policies and actions.

50. Targeted information campaigns and offering of low threshold services, including outreach services to undocumented migrants, asylum seekers, at-risk-youth or homeless persons, can help identify and engage with potential persons at risk. Such outreach efforts as well as local employment services can be used to spread information on rights such as terms of employment, minimum wages and working hours as well as risks related to false job advertisements, paying recruitment fees and/or on issues such as bogus self-employment.

51. Increasing knowledge and building capacity of local actors allows them to be more active in combatting human trafficking. This includes moving beyond the obvious institutions such as the local law enforcement agencies and involving different local professionals such as staff in schools, libraries, youth services, centres for the homeless, as well as social and health care professionals, labour, social and housing inspectors, fire and rescue services. All of them can play an active role in the prevention of trafficking in human beings. Depending on the profile of the local area or region, it is possible for cities, municipalities and regions to address phenomena such as abusive recruitment via information campaigns targeting people who are looking for job opportunities abroad or in seasonal work, for example.

52. A key area where local and regional authorities and actors have showcased a rapid response concerns the displacement and conflict-related vulnerabilities among refugees of the Ukrainian war, including unaccompanied children. Although visa-free travel and rapid access to Temporary Protection status have significantly decreased the risks of trafficking, persons fleeing the conflict are nonetheless at risk of exploitation and trafficking.<sup>52</sup> Since the start of the Russian aggression, the Human Rights Commissioner of Ukraine has received numerous appeals from citizens captured by Russian forces and exploited and forced into various forms of labour against their will. Those living in the Russian-occupied territories of Ukraine are particularly vulnerable to falling victim of human trafficking and labour exploitation.<sup>53</sup>

53. Continued vigilance is needed to ensure that Ukrainian refugees and in particular unaccompanied Ukrainian children having fled their country do not fall prey to traffickers, as pointed out by the Council of Europe Consultation Group on the Children of Ukraine during a hearing on 2 July 2024. As the first point of contact for children fleeing conflict, local and regional authorities are the first line of defence in their protection against trafficking. The Congress has highlighted some good practice examples in this regard in its 2022 report on women and children refugees, notably those identified during its study visit to Polish cities hosting Ukrainian refugees.<sup>54</sup>

### 5.1.1. Main challenges

54. Previous research has outlined that often migrants, vulnerable and mobile populations lack information on the risks of human trafficking as well as information on their rights and places where to seek advice and support.<sup>55</sup> Depending on the profile of the region or area, it may be that vulnerable populations are looking for employment opportunities within their own country or are looking for migration and employment opportunities in other countries. It may also be that the vulnerable populations have already migrated to destinations where they are looking for employment opportunities.

<sup>51</sup> CBSS (2016), p. 53.

<sup>52</sup> UNODC (2022), [Conflict in Ukraine: Key evidence on risk of trafficking in persons and smuggling of migrants](#); IOM (2023b), [Human trafficking in the Ukraine crisis](#); GRETA (2023), [12th General report covering the period from 1 January to 31 December 2022](#), Council of Europe, Strasbourg, pp.29–41.; GRETA (2023), [13th General Report covering the period from 1 January to 31 December 2023](#), Council of Europe, Strasbourg, 38–42.

<sup>53</sup> Contribution by the Ukrainian delegation to the Congress (2024)

<sup>54</sup> Council of Europe – Congress of Local and Regional Authorities (2022), [Reception of women and children refugees in Europe's cities and regions](#).

<sup>55</sup> FRA (2019); IOM (2023a).

This may include undocumented migrants, asylum seekers and refugees, mobile populations as well as homeless and absconded youth looking for opportunities in larger cities or more populated regions. 55. A report by the Ethical Trading Initiative notes that there is a lack of regional networks of local, migrant-centred civil society organisations in workers' countries of origin or transit, which could inform them about ethical recruitment and labour rights and enable them to avoid labour exploitation risks.<sup>56</sup>

56. A lack of awareness among local and regional elected officials and service providers on human trafficking and risks of labour exploitation is another challenge, combined with a lack of partnerships among key local actors. If various actors are not aware of the overall human trafficking phenomenon, they do not see their role in prevention and in disseminating information on rights to vulnerable populations. It is also important to notice that labour exploitation may emerge in areas where the risk is not considered high or where risks have not yet been identified.

57. A lack of a strategic approach and scarce resources make it difficult to develop a comprehensive approach towards preventing human trafficking and labour exploitation, including in public procurement. This means that the supply chains of cities and municipalities may contribute to exploitation and trafficking if they do not have clear policies, processes and safeguards in place to prevent such activities and processes in place to address such incidents if they occur.

58. A lack of ethical recruitment mechanisms and clear guidelines may result in situations where municipalities themselves are recruiting workers, for example in cleaning, catering or healthcare positions, via recruitment agencies who charge large fees to the workers. Being indebted is a significant risk factor for labour exploitation and increases the risk of such workers being exploited.<sup>57</sup>

59. In some countries, such as Belgium, the issuing of work permits is the responsibility of the regional authorities.<sup>58</sup> This is also an area where a preventative approach is needed, as it may be possible to identify abusive employers based on existing (registry) information and thereby withhold from issuing permits to the migrant workers they intend to hire in the first place. Otherwise, abusive employers can simply recruit more workers to be exploited when others leave their employment or are made redundant.

### 5.1.2. Solutions

60. Some good practices can be identified from Council of Europe member States where local and regional authorities have developed strategies, policies and measures to overcome the challenges mentioned and to strengthen their efforts in preventing trafficking and exploitation.

61. In the UK, in the Greater Manchester Area, Programme Challenger<sup>59</sup> has been set up as a partnership response to serious and organised crime and to reduce the risk of vulnerable people becoming victims. The programme brings together expertise from across a variety of public, private and voluntary sector organisations in the Greater Manchester area to share information and insight and to better target resources and activities. As part of the response, they have developed resources that provide centralised, multi-agency coordination and support to tackle serious and organised crime. A Modern Slavery Coordination Unit has also been set up to ensure a comprehensive approach. A detailed strategy document outlines and guides their work.<sup>60</sup> Manchester's Community Safety Partnership has also developed a Strategy for Prevention of Serious Violence (2022-2025) which focuses on stopping serious violence through prevention and early intervention.<sup>61</sup>

62. In Serbia, the City of Niš has established a Local Team for Prevention and Combating Human Trafficking. The team includes local elected officials, representatives of the city administration, local police, prosecution and courts, labour inspection service, social and health care services, employment services, a local safe house, the Niš Bar Association and local NGOs. Through the Team the City of Niš is actively working to strengthen recognition of the risks of human trafficking and on raising awareness of all actors, including the general public, about specific vulnerabilities as well as the rights of trafficked persons. The Team also works with migrants and vulnerable groups.

<sup>56</sup> ETI – Ethical Trading Initiative (2023), [Grievance mechanisms in agriculture - Synthesis report](#), p.15.

<sup>57</sup> O'Connell Davidson J. (2013), "[Troubling freedom: Migration, debt, and modern slavery](#)", *Migration Studies*, Volume 1, Issue 2, pp. 176–195.

<sup>58</sup> ELA – European Labour Authority (2023), [Report on the co-operation practices, possibilities, and challenges between Member States – specifically in relation to the posting of third-country nationals](#), ELA, Bratislava, p. 123.

<sup>59</sup> Programme Challenger, <https://www.programmechallenger.co.uk/>.

<sup>60</sup> Programme Challenger (2022), [Greater Manchester Serious and Organised Crime Strategy 2022](#).

<sup>61</sup> Manchester's Community Safety Partnership, [Serious Violence Strategy 2022–2025](#).

63. In Southern Italy, the Su.pr.eme. project focused on preventing the exploitation and marginalization of migrant workers in the agricultural sector. It was an interregional project, coordinated by the region of Apulia and in co-operation with the Basilicata, Calabria, Campania, and Sicily regions. The initiative aimed to improve living conditions, prevent labour exploitation, enhance healthcare services, promote socio-economic inclusion, and support regional governance to address this issue.<sup>62</sup> The local committees are planning methods to set up the referral mechanism in the region, and are planning a new programme is underway to give continuity to this project.<sup>63</sup> Similarly also North-Central Regions have been asked to create a regional governance system for the protection of victims of labour exploitation, including in sectors other than agriculture.<sup>64</sup>

64. In North Macedonia, the NGO Open Gate has supported 11 local youth initiatives aimed at raising the awareness of youth about human trafficking as a reality in their own communities. The activities took place in the capital city of Skopje but also in the central, western and eastern parts of the country in bigger cities and smaller communities. All initiatives were led by teams of young people, with the support of their local municipal youth worker.<sup>65</sup>

### 5.1.3. Focus on labour exploitation: prevention via public procurement

65. States are the largest consumers in the global marketplace, with public procurement accounting for 15-20 per cent of GDP in OECD member States. Subnational authorities are amongst the most important public buyers of goods and services via public procurement. In 2021, in the OECD, more than 60 per cent of procurement spending took place at the local or regional level.<sup>66</sup> This means that towns, cities and regions have an extraordinary power to fight human trafficking, protect human rights and drive change through their procurement policies.

66. Responsible and ethical procurement ensures that the supply chains of cities and regions are free from labour exploitation when they are procuring cleaning, construction, repairment or other services. Public buyers have significant purchasing power to ensure that they do not contribute to exploitation and rather promote opportunities for socially responsible companies by awarding contracts to suppliers who can document safe, legal and fair working conditions.<sup>67</sup>

67. The risks of labour exploitation are best prevented when the contracting entity is aware of who is working and under which terms and conditions and ensures that the supplier complies with legal requirements on insurance, wages, work permits and taxes. This also requires transparency towards workers, so that they know their rights and can safely report problems without repercussions. Moreover, there should be processes in place to react when suspicions of labour exploitation are detected.<sup>68</sup>

68. A human-rights centred ethical public procurement policy has to be implemented throughout local and regional administrations, but its creation is subject to political will by local and regional policy makers. It is the responsibility of policy makers to set up ethical procurement policies that can be implemented throughout their administration. Local and regional elected officials need to be made aware of the leading role they can play in this field. Not only does ethical public procurement help fulfil their legal human rights obligations, but it also reduces risks (including legal and financial risks in the case of legal procedures by victims) and drives change in the corporate sector, as companies that abuse human rights will miss out on contracts.

69. The Danish Institute for Human Rights has developed a toolkit on human rights for procurement policy makers and practitioners, including at the subnational levels, that outlines a clear step-by-step process on how to develop ethical procurement policies.<sup>69</sup>

<sup>62</sup> IOM (2023), p. 18.

<sup>63</sup> GRETA (2024), [Italy 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, p. 41.

<sup>64</sup> Ibid.

<sup>65</sup> CCIF (2021), [Youth Workers - Key To End Human Trafficking. Manual](#), p. 36.

<sup>66</sup> OECD (2022), [Public procurement](#).

<sup>67</sup> OSCE - Organization for Security and Co-operation in Europe (2023), [The role of public procurement in preventing trafficking for labour exploitation in supply chains and advancing human rights](#).

<sup>68</sup> Lietonen, A. and Ollus, N. (2021), [Labour Exploitation and Public Procurement](#), HEUNI, Helsinki, p. 10.

<sup>69</sup> The Danish Institute for Human Rights (2020), [Driving Change Through Public Procurement](#).

70. In Norway, the City of Oslo has used the Oslo Model in its contracts in construction, cleaning and other risk sectors, to combat work-related crime and social dumping since 2017. On 1 September 2023, the new Oslo model introduced stricter requirements in the construction sector, to ensure that permanently employed skilled workers are used for all positions by their suppliers. Oslo also requires its suppliers to inform workers about the Model and their rights under the Working Environment Act. Furthermore, there is a transparency requirement to ensure the integrity of the suppliers. Finally, Oslo has also increased its focus on contract follow-up and sanctions.<sup>70</sup>

71. In Finland, construction has also been identified as a risk sector for labour exploitation. In 2021, the City of Helsinki launched on-going co-operation with the Confederation of Finnish Construction Industries RT and the Finnish Construction Trade Union to combat the grey economy and labour exploitation at construction sites. During joint supervision visits, inspectors provide information on the latest manifestations and schemes to the suppliers and their staff. The aim of the spot checks is to support the responsibility of the contracting partners and to identify occupational safety deficiencies and abuses that cannot always be prevented by means of advance supervision.<sup>71</sup>

72. Some municipalities, cities or regions have developed their own guidelines for ethical public procurement. Local tailoring requires expert input from procurement practitioners as well as robust knowledge of local circumstances, supply markets, trafficking risks, labour practices, and supply and procurement needs of individual field operations.<sup>72</sup> For example, the Government of Wales, has published a guideline for Welsh public sector organisations, businesses participating in public procurement and organisations using public funds which must commit to the 12 principles listed in the code of practice. The text includes a Guide to Tackling Modern Slavery and Human Rights Abuses, outlining actions such as, for example, the appointment of an 'anti-slavery and ethical employment champion' and supply chain mapping.<sup>73</sup>

#### **5.1.4. Key initiatives for local and regional authorities**

73. To work towards preventing human trafficking, including for labour exploitation, local and regional authorities and elected officials can put in place several measures.

74. To ensure a comprehensive approach to preventative work: develop a strategy for prevention of trafficking or, alternatively, ensure that the work against trafficking is mainstreamed into wider programmes towards the prevention of violence, including gender-based violence and/or organised crime at local and regional levels.

75. To ensure that the municipality's own supply chains do not contribute to labour exploitation and trafficking: introduce an explicit political commitment and corresponding processes to ban trafficking and labour exploitation in public procurement. Develop ethical procurement and recruitment and work only with trusted and transparent recruitment agencies to ensure that workers are not charged illegal recruitment fees and costs.

76. To ensure that vulnerable populations have access to information on their rights: organise awareness raising campaigns and/or develop other tools for dissemination of information e.g. via mobile apps, videos and posters.

77. To target specific countries and regions of origin of victims: develop networks involving migrant-centred civil society organisations in workers' countries of origin or transit, to inform them about labour rights already in advance and enable them in avoiding labour exploitation risks.

78. To build capacity of local elected officials and professionals working in social, health care, migrant and youth services: develop training and resources and clear, hands-on guidance they can utilise if they suspect trafficking. The guidance at a minimum should outline the internal process of reporting the case to responsible unit or authority and referring the potential victim to services.

<sup>70</sup> Oslo Kommune, [Byrådet lanserer ny Oslomodell](#), 10 May 2023.

<sup>71</sup> Lietonen A. and Ollus N. (2021).

<sup>72</sup> OSCE (2023), p. 2.

<sup>73</sup> Welsh Government (2021), [Welsh Procurement Policy Note WPPN 11/21: Ethical employment practices in public sector supply chains – advice for the Welsh Public Sector](#).

79. To ensure commitment of all actors involved: build political support for and awareness of the role of municipalities and regions in the fight against trafficking. Mayors in particular can play an important role in putting the topic of human trafficking on the political agenda of the local council.

## 5.2. Outreach, detection and referral of victims

80. As outlined by GRETA, there are several ways in which local and regional authorities participate in the detection and identification of victims of trafficking.<sup>74</sup> First and foremost, local and regional authorities are often the first point of contact for victims of trafficking or persons at risk. Contrary to national authorities, their proximity allows them to interact directly with victims through different local such as social benefit offices, housing, employment, and health services. Teachers, youth workers, library and information centre staff and other civil servants who register people in the municipal database can also detect potential victims of trafficking. Furthermore, local law enforcement, municipal fire and safety inspectors and health and food safety inspectors can detect suspicious situations of possible trafficking during routine tasks or inspection visits.

81. Formal identification of potential victims of trafficking is crucial, as it not only offers them protection, but also as it is often a pre-condition for access to assistance they would otherwise not receive. This is particularly important in the case of victims of trafficking for labour exploitation, whose cases would otherwise often be treated as breaches of labour law, rather than as cases of human trafficking. However, many victims are not aware of the fact that they are victims, so rather than relying on them to identify their own situation, it is up to the professionals to spot the signs of trafficking and exploitation and to refer the potential victims to appropriate services. The provision of low threshold, mobile and outreach services allow local and regional authorities and actors to build trust with the affected communities and groups at risk, help prevent trafficking, but also strengthen detection and referral of potential victims of trafficking to specialised services.

82. Local and regional authorities are best placed to identify possible risk sites, as they are aware of ongoing developments and trends in their communities. In rural areas, the risk sites may include for example farms or green houses and housing intended for temporary and seasonal workers. In urban areas, the sites may include public transportation hubs, large construction and infrastructure building sites, areas in which there are a lot of small restaurants, kiosks and street vendors, asylum centres and centres for the homeless, or residences in which a lot of temporary and migrant workers are housed. These sites may be used for engaging with the various communities to provide outreach and mobile services to vulnerable populations and to consequently strengthen detection of trafficked persons.

### 5.2.1. Main challenges

Depending on the profile of the region or the local area, the incidence of human trafficking cases may vary. This means that actors who are the first point of contact may not have updated information on recent trends or indicators of human trafficking, nor do they have procedures in place to refer potential victims to specialised services. Moreover, while there might be guidelines for referring women victims of trafficking for sexual exploitation to specialised services, there might be a lack of procedures and options for referring trafficked men to services, including safe housing.<sup>75</sup> Gender stereotypes can undermine the ability of local actors to correctly identify male trafficking victims, which prevents them from receiving the necessary assistance and protection services.<sup>76</sup>

83. A lack of low-threshold services results in situations where it may be very difficult for potential victims of trafficking to gain access to information and support on their rights and options, especially if the services are only available in local languages the victim does not speak, during very restricted operating hours, or only via phone. Some victims may not speak the local language, so information should be available in multiple languages and via different means, such as videos, apps and posters.

84. A lack of safe reporting options may lead to situations where exploited migrants have to suffer the consequences of disclosing their experiences to authorities.<sup>77</sup> This means that they might lose their job,

<sup>74</sup> Document on the role of local and regional authorities in combating trafficking in human beings, prepared by the Secretariat of GRETA and presented to the Current Affairs Committee in February 2024.

<sup>75</sup> See e.g. Smiragina-Ingelström P. (2020), [Human Trafficking of Men: A Gendered Perspective on Victimhood](#), University of Sydney.

<sup>76</sup> ICAT (2017), [The Gender Dimensions of Human Trafficking](#), p. 2.

<sup>77</sup> See e.g. PICUM - Platform for International Cooperation on Undocumented Migrants (2021), [Safe Reporting.](#)

their housing if it is organised by the employer, as well as their work permit or be fined or deported because of irregular work or their undocumented migration status, for example. This further hampers the detection and identification of victims.

### 5.2.2. Solutions

85. Some good practices can be identified from Council of Europe member States where local and regional authorities have developed innovative approaches to overcome the challenges mentioned previously and have strengthened efforts to detect potential trafficking situations and refer victims of trafficking to services.

86. In North Macedonia, mobile teams have been set up in five towns (Bitola, Gevgelija, Kumanovo, Skopje and Tetovo) to proactively detect vulnerable persons and victims of trafficking. The teams include police officers from the Police Unit against Human Trafficking and Smuggling of Migrants, social workers and representatives of NGOs. After identifying a potential victim, the Team is tasked to provide them with support and services aimed at reducing their vulnerability to being trafficked or re-trafficked.<sup>78</sup> Similarly in Albania, mobile units have been established in six regions (Tirana, Vlora, Elbasan, Shkodra, Kukës and Dibër) to improve the proactive approach to identifying trafficked persons. The mobile units visit places where there are risks of trafficking, such as night clubs and begging hotspots.<sup>79</sup>

87. In the Netherlands, the so-called “barrier model” is used to address trafficking at the local level by utilising an administrative approach beyond the mere criminal justice approach. The administrative approach to serious and organised crime is a complementary way to prevent and tackle the misuse of the legal infrastructure through multi-agency co-operation by sharing information and taking actions in order to set up barriers.<sup>80</sup> Concretely, the Public Administration (Probity Screening) Act allows municipalities to refuse or revoke business permits when the applicants have criminal connections or when the flow of funds is not transparent.<sup>81</sup> For example, the city of Rotterdam has been cooperating with various local partners to prevent, combat and counter labour exploitation in Chinese restaurants and in beauty parlours. The administrative measures in place include supervision of granting the permits (operation of business, Licencing & Catering Act, employment of staff) and supervision of the premises (zoning plan, registration in the Municipal Personal Records Database, safety of the premises).<sup>82</sup>

88. Municipalities in the Netherlands are also directly involved in the regulation and control of the prostitution sector and are thus in a position to act against trafficking for sexual exploitation, including through health and safety inspection visits in registered premises.<sup>83</sup> The city of Amsterdam, for example, has municipal inspectors who can follow up on sex work advertisements and can close flats in case of violations for at least three months based on the General Local Ordinance and the zoning plan.<sup>84</sup>

89. Similarly, in Belgium, the administrative approach can be used by local authorities to take action against slum landlords who let poor quality housing to vulnerable often undocumented persons at excessive prices. The mayor and the local administration have extensive administrative powers to prevent and penalise ‘slum letting’ by having the property declared unsuitable and/or unfit for habitation. This allows Regional Home Inspection to focus on the most distressing situations which can lead to criminal prosecution as well.<sup>85</sup>

90. Safe reporting measures exist or are being developed in some European cities. Such measures allow undocumented migrants to report crimes they have been subjected to without fear of being deported. So-called ‘free in, free out’ policy was developed in Amsterdam by the local police and extended to additional municipalities, including the cities of Utrecht and Eindhoven. It became national

GRETA (2023), [North Macedonia 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, para. 25,152.

<sup>79</sup> GRETA (2020), [Albania 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, para. 156.

<sup>80</sup> ENAA - European Network on the Administrative Approach tackling serious and organised crime, [Definition](#).

<sup>81</sup> GRETA (2014), [Netherlands 1st evaluation round: Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the Netherlands](#), Council of Europe, Strasbourg, para. 59.

<sup>82</sup> EUCPN - European Crime Prevention Network (2014), [Toolbox Series No. 5 Administrative approach – towards a general framework](#), 26.

<sup>83</sup> GRETA (2014), [Netherlands 1st](#), para. 59.; see also EUCPN (2014), p. 25.

<sup>84</sup> NL Times (2024), [“Amsterdam closes Zuidooost home in human trafficking case”](#), 24 January 2024.

<sup>85</sup> EUCPN (2014), p. 23.

policy in the Netherlands in 2015.<sup>86</sup> Moreover, the safe reporting project is setting up or improving practices in the participating cities of Barcelona, Gent, Utrecht and Milan to enable safe reporting of crimes by victims with irregular migration status. The activities include research, awareness campaigns, capacity building, the establishment of local partnerships and dissemination of knowledge.<sup>87</sup> Victim Support Finland has developed a practice in co-operation with the Helsinki police where they facilitate informal discussions between potential victims of trafficking and officers of the Helsinki police department before the victim decides to report a crime to the police. During this facilitated discussion, a potential victim can meet with a police officer from the specialised human trafficking unit to talk about the situation and ask questions related to trafficking and the potential criminal investigation without disclosing their own or their employer's identity.<sup>88</sup>

91. In Lithuania, the state labour inspectorate set up a pilot group of inspectors in the Vilnius region in 2020 for the control and prevention of trafficking in human beings. They gather and systemise data and collaborate with NGOs and the police. If they suspect trafficking, they will refer the case to the police. Other divisions of the inspectorate can also refer cases to them if they suspect exploitation. In 2022, a similar group was established in the Kaunas region.<sup>89</sup>

### 5.2.3. Focus on labour exploitation: use of risk profiling to focus efforts

92. The use of risk profiling and conducting assessment of the local situation allows local and regional authorities to make better use of their limited resources to target, controls and inspections to those sectors, sites and locations where the risks of labour exploitation are greatest.

93. Risks of labour exploitation increase if workers are isolated from the local population, work informally, and/or have few opportunities for inclusion, integration, and social mixing. Another risk factor is if work takes place in isolated locations or is spread out on large fields and is less visible to outsiders and potentially hard to access by labour inspectors, or if the workers are housed by the employers in makeshift or temporary housing.<sup>90</sup>

94. The process of risk profiling includes the collection and collation of information from various sources from the field, such as from other local and regional authorities and actors such as associations, trade unions, NGOs, communities and individuals. By combining data and tips from multiple sources, it is possible to identify red flags, risk factors, or sectors, which warrant a closer look, for example in the form of joint inspections by the labour inspection and tax authorities. There are also examples where labour inspectors cooperate with NGOs during actual inspections. For example, in Greece, the Greek labour inspectorate has put in place a co-operation protocol with an NGO that is able to accompany inspectors on inspections and help build trust.<sup>91</sup>

95. In the UK, a special task force consisting of various actors was established in 2020 in Leicester, operating under the name Operation Tacit. The group was formed in response to incidents that emerged in the region's textile industry, involving suspected cases of labour exploitation. The task force was formed mainly from the existing members of the Leicester Labour Market Platform.

96. The task force is led by the Gangmasters & Labour Abuse Authority and includes participants from the National Minimum Wage Team, Employment Agency Standards Inspectorate, Leicestershire Police, National Crime Agency, Health and Safety Executive, Leicester City Council, Department for Work and Pensions, Public Health England, Leicester Fire and Rescue Service, and Immigration Enforcement. The task force coordinates the co-operation between different authorities, the gathering and sharing of information, and activities within the local community to spread awareness and encourage workers to report any concerns.<sup>92</sup> According to a report by the Leicester City Council, more than 200 inspection visits were carried out during the first year of the operation, and 16% of these inspections revealed issues related to underpayment and occupational health and safety deficiencies.<sup>93</sup>

<sup>86</sup> Timmerman R. I., Leerkes A., Staring R. and Delvino N. (2020), "[Free In, Free Out: Exploring Dutch Firewall Protections for Irregular Migrant Victims of Crime](#)", *European Journal of Migration and Law*, 22(3), 427-455, pp.438-439.

<sup>87</sup> Safe Reporting, <https://www.safereporting.eu/>.

<sup>88</sup> ELECT THB – Enhanced Law enforcement Cooperation and Training on Trafficking in Human Beings (2022), [Summary of the best practices collected](#), pp. 33-34.

<sup>89</sup> ELECT THB -project (2023), [Operational exchange visit to Lithuania](#).

<sup>90</sup> IOM (2023).

<sup>91</sup> ELA training workshop for labour inspectors in Cyprus 15-16 November 2023.

<sup>92</sup> Home Office (2020), [UK Annual Report on Modern Slavery 2020](#), Home Office Modern Slavery Unit, London.

<sup>93</sup> Leicester City Council (2021), [Report to Scrutiny Commission. Leicester Textiles Sector. Report of the Director of Neighbourhood & Environmental Services/Director of Tourism, Culture and Investment](#), Leicester City Council, Leicester.

97. Moreover, in the Greater Manchester area, the care sector has been recently identified as a risk sector for modern slavery, human trafficking, labour abuse and organised immigration crime. As a result, in 2024 a guide was launched by the Programme Challenger for combatting exploitation in the care sector.<sup>94</sup> It includes very concrete case examples and tools for practitioners to be aware of and identify potential signs, know where to gather additional information from, guidance on how to report issues further, and to consider changes to local arrangements to safeguard against and respond to suspicious activities.<sup>95</sup> To work on the issue, the Integrated Care System is working with Greater Manchester Combined Authority, Greater Manchester Police and Adult Safeguarding Boards, as well as linking into the Good Employment Charter, Care Quality Commission, Local Authorities and Age Friendly Greater Manchester.<sup>96</sup>

#### **5.2.4. Key initiatives for local and regional authorities**

98. To work towards improving outreach, detection and referral of victims, including for labour exploitation, local and regional authorities can put in place several measures.

99. To better engage with vulnerable populations and establish trust and rapport: develop low-threshold and mobile outreach services, which are accessible for groups at risk and potential victims. Make sure that information and services are available in multiple languages and in multiple formats, and that trusted interpreters may be used to communicate with potential victims.

100. To avoid the risk of potential victims not daring to report their experiences to authorities: develop safe reporting pathways and collaborate with or fund NGOs who work with vulnerable and mobile populations and which can help in building trust towards local authorities.

101. To ensure that all key local professionals are able to identify victims of trafficking: offer regular training to local elected officials and services, including police, labour, tax and health inspectors, as well as municipal services staff on indicators of human trafficking and develop referral guidelines to ensure they know where they should refer potential victims of trafficking.

102. To maintain a clear picture of the local risks and trends: establish a local or a regional anti-trafficking network or a coordinating structure within the municipality or region to facilitate exchange of information. Utilise risk profiling to focus efforts to sectors and locations with the highest risk for trafficking and exploitation.

103. To interfere in irregular and unscrupulous business practices: make use of the administrative approach to control businesses including via zoning and licensing regulations, or public health regulations.

#### **5.3. Assistance to victims**

104. Victims of trafficking have the right to assistance according to international law and policy, including the Council of Europe Anti-Trafficking Convention, the EU Anti-Trafficking Directive and the EU Strategy on victims' rights 2020-2025.<sup>97</sup> Article 12, paragraphs 1 and 2, of the Anti-Trafficking Convention set out the obligation of State Parties to provide assistance to persons for whom there are "reasonable grounds to believe" that they are victims of trafficking in order to assist them in their physical, psychological and social recovery. The Convention provides a list of assistance measures that must be guaranteed, including appropriate and secure accommodation, psychological and material assistance, access to emergency medical treatment, translation and interpretation, counselling and information, and access to education for children. These assurance measures are often provided at the local level.

105. Assistance to victims of trafficking is organised in a variety of different ways across Council of Europe member States. While some countries like Finland and Denmark have set up national, state-run and funded assistance system or a service centre for victims of trafficking, in countries like the Netherlands, Norway and Sweden the task of providing support to victims of trafficking is the direct responsibility of the municipalities. In some countries, like in Belgium, Italy, Latvia and Lithuania the

<sup>94</sup> Programme Challenger (2024), [A guide to Exploitation and Organised Immigration Crime in the Care Sector](#).

<sup>95</sup> Ibid.

<sup>96</sup> Ibid., p. 7.

<sup>97</sup> European Commission (2020), [EU Strategy on victims' rights \(2020-2025\)](#), p. 13.

service provision to trafficked persons is mainly handled by specialised NGOs, which are often at least partly funded also by local municipalities or regional authorities in addition to receiving state funding for providing services to victims.

106. Overall, in most countries local and regional authorities are at least partly responsible for the provision of assistance to victims of trafficking. This includes organisation of social and health care services, shelters, economic support, migrant, integration, and employment services as well as offering advice and guidance on various topics, including gaining access to different types of services and activities. They also often fund various local associations, NGOs and community initiatives, which can provide support to victims of different backgrounds, including children.

### 5.3.1. Main challenges

107. The capacity to offer support and the level of services available to victims might vary from one municipality to another, which may result in regional differences in accessing assistance and service provision. Victims need both short-term emergency assistance to deal with acute crisis, but also longer-term assistance in order to recover and find means to access employment and housing, for example.<sup>98</sup> In many smaller municipalities and cities, the main challenge is that victims of trafficking are seldom encountered or identified and thus there is a lack of experience and information, also in terms of provision of services. There may also be a lack of gender- and child-sensitive services. In bigger cities, or at the regional level, there might be specialised units which employ professionals who assist victims of trafficking on a day-to-day basis and are familiar with all victims of all forms of trafficking and their needs.

108. Trafficked persons and victims of sexual exploitation may be severely traumatised because of the abuse they have suffered. They may require long-term therapy and specialised medical services, including gynaecological services, psychiatric care and medication to be able to cope and recover from their experiences.<sup>99</sup> However, victims of other forms of exploitation, including labour exploitation may be also traumatised and need specialised support to deal with PTSD, depression and/or anxiety.<sup>100</sup> It may be difficult for smaller municipalities and cities to provide such specialised services, so it is important to ensure that there are means to procure these services from the private sector and/or specialised serviced providers, or to organise such services in co-operation with other municipalities, cities or regions.

109. Moreover, there might be challenges in organising services to victims of different forms of exploitation, including those exploited in begging or forced criminal activities. While there might be shelter options available for women, there is often a lack of safe housing options for men, for larger groups of people, people with children or people with special needs and/or disabilities.<sup>101</sup>

110. A lack of coordination of services may result in situations where the victim is moved from one place and service provider to another, without any clear picture on who is responsible and what individual needs the person might have. The length of assistance available may also be limited because of national legislation and/or lack of resources, meaning that the victim is at a risk of being re-trafficked, if they do not have a safe place to live for more than a few months. Victims from third countries may also have to be returned to their countries of origin, if they do not receive a residence permit for the length of the pre-trial investigation, or do not have other residence permit options available for them on the basis of international protection or employment.

### 5.3.2. Solutions

111. Some good practices can be identified from Council of Europe member States where local and regional authorities have developed measures to provide better assistance to victims of trafficking.

<sup>98</sup> CBSS (2020), [Road map for integration of victims of human trafficking](#), CBSS, Stockholm.

<sup>99</sup> Chambers R., Gibson M., Chaffin S., Takagi T., Nguyen N. and Mears-Clark T. (2024), "Trauma-coerced Attachment and Complex PTSD: Informed Care for Survivors of Human Trafficking". *Journal of Human Trafficking*, 10(1), 41–50.

<sup>100</sup> Hopper E. K. and Gonzalez L. D. (2018), "A Comparison of Psychological Symptoms in Survivors of Sex and Labor Trafficking", *Behavioral Medicine*, 44:3, 177-188.

<sup>101</sup> See e.g. ICAT (2017).; GRETA (2018), "[Thematic Chapter of the 6th General Report on GRETA's Activities: Trafficking in children](#)", Council of Europe, Strasbourg.; GRETA (2019), "[Thematic Chapter of the 8th General Report on GRETA's activities: Assistance to Victims of Human Trafficking](#)", Council of Europe, Strasbourg.; Smiragina-Ingelström P. (2020).

112. In Spain, the city of Barcelona has set up the Municipal Unit against Human Trafficking (UTEH) which provides support to trafficked persons regardless of gender and the type of exploitation. It also offers advice to professionals.<sup>102</sup> In Madrid, the Municipal network against trafficking and sexual exploitation has been set up to ensure comprehensive support and assistance to women victims of trafficking. There is also a mobile unit, which does outreach work among victims of sexual exploitation and/or persons engaged in sex work/prostitution contexts in the different areas or spaces where they spend time in the city of Madrid. They can detect potential victims and refer them to services provided by the other partners in the Network, which also include a shelter.<sup>103</sup> Furthermore, there are regional protocols in place for the identification and referral to assistance of victims at the level of autonomous communities, such as in Catalunya and Madrid, with regard to victims of all forms of exploitation, and in Galicia, Extremadura and Navarra with focus on victims of sexual exploitation.<sup>104</sup>

113. In Sweden, according to the Swedish Social Services Act, exploited persons in need of assistance, including presumed victims of human trafficking, are entitled to receive support and assistance from the municipality.<sup>105</sup> Regional anti-trafficking coordinators are employed by the social services at the regional level. They offer practical consultation and guidance both to individuals who seek help as well as to various professionals.<sup>106</sup> Municipalities which do not have experience in handling cases of trafficking may at any time contact the appointed Regional Coordinator in their region for support in human trafficking cases.<sup>107</sup> In the Netherlands, regional care coordinators are the first point of contact for victims of trafficking. They ensure that correct procedures are initiated, so that the victim can access benefits and health insurances, apply for a residence permit and is registered within the municipality.<sup>108</sup>

114. In Germany, the responsibility for identification, referral and victim assistance is organised on a regional level (Länder level). Victims can receive assistance through Specialised Counselling Centres, funded by the Länder.<sup>109</sup> For example in Saxony, KOBRA-net offers support for victims of human trafficking for the purpose of sexual exploitation and for victims of violence in the name of "honour". They have offices located in Dresden and Leipzig and they cooperate closely with public health offices, police, doctors, lawyers, job centres, and reception facilities in Saxony.<sup>110</sup> In Mecklenburg-Western Pomerania a specialised counselling centre "CORRECT!", offers support to refugees in order to inform them of the potential risks of precarious working situations. Their staff was increased in order to provide services in Ukrainian. There are also facilities for providing care and counselling for victims of trafficking in human beings for the purpose of sexual exploitation and forced marriage.<sup>111</sup> Moreover, the specialised advice centres from the Eastern part of Germany have set up their own network to strengthen and use the skills of the specialist advice centres by exchanging experiences and combining existing resources in supporting victims of trafficking.<sup>112</sup>

115. In Portugal, regional multi-disciplinary teams for the support and protection of victims of trafficking have been set up. Each team has a regional network of partners, including police forces, health services, social and educational services, and NGOs. They have a key role in the identification process and supporting victims by providing safe accommodation, psychological assistance, legal advice and other services.<sup>113</sup>

116. In Norway, the city of Oslo runs a Human Trafficking Support Oslo office (NAV Grønerløkka) which is responsible for supporting presumed victims of human trafficking in the City of Oslo. It also follows up on people who have applied for or been granted a reflection period, and their accompanying children.<sup>114</sup>

<sup>102</sup> Ajuntament de Barcelona, [Municipal Unit against Human Trafficking \(UTEH\)](#).

<sup>103</sup> Ayuntamiento de Madrid, [Municipal network against trafficking and sexual exploitation](#).

<sup>104</sup> GRETA (2023), [Spain 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, para. 219.

<sup>105</sup> CBSS (2019), [Sweden](#), p. 3.

<sup>106</sup> Swedish Gender Equality Agency, [Regional Coordinators](#).

<sup>107</sup> CBSS (2019), p. 3.

<sup>108</sup> Comensha, <https://www.comensha.nl/english/>.

<sup>109</sup> CBSS (2020), [German](#), p. 1.

<sup>110</sup> EUCPN – European Crime Prevention Network, [Good practice template: Germany](#).

<sup>111</sup> Mujaj E. and Mäkelä V. (2022), ["Human Trafficking Baltic Sea Region Round-Up Report 2022"](#), Council of the Baltic Sea States, p. 16.

<sup>112</sup> EUCPN, [Good practice template: Germany](#).

<sup>113</sup> GRETA (2022), [Portugal 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, paras. 21 and 192.

<sup>114</sup> Mennesker til salg, [Human Trafficking Support Oslo](#).

117. In the Netherlands, the city of Amsterdam has set up a Coordination Point for Human Trafficking (ACM) to offer shelter, help and support to victims of human trafficking. They have shelters for men and women.<sup>115</sup> There are also two dedicated shelters with special arrangements for child victims of “loverboys”, run by Fier and Sterk Huis, which are financed by the municipalities of Leeuwarden and Tilburg.<sup>116</sup> In Austria, the NGO MEN VIA provides assistance and support to adult men who are victims trafficking. They run a specialised service centre and a shelter for male victims of trafficking in Vienna.<sup>117</sup> There is also a specialised shelter for children in Vienna called Drehscheibe Centre<sup>118</sup> which provides accommodation and social pedagogical support to unaccompanied foreign children and child victims of trafficking.<sup>119</sup> A shelter for trafficked men has also opened in Moldova.<sup>120</sup>

118. In the UK, Justice and Care has the Victim Navigator Programme in 2018. Victim Navigators are currently operating in Surrey, Essex, Greater Manchester, Police Scotland and the Metropolitan Police Forces, as well as in East Midlands. The Navigators act as a trusted bridge between police and victim to increase victim engagement. They provide specialist care and support to victims, including access to counselling, legal advice and medical care. They also provide tactical advice into investigations and training for key policing leaders and agencies.<sup>121</sup>

### 5.3.3. Focus on labour exploitation: facilitating access to legal advice

119. Victims of labour exploitation often have specific support needs that relate to legal advice and support in claiming back their unpaid wages. Local employment offices can refer victims to legal support services, including those offered specialised NGOs and trade unions. In many member States, trade unions are particularly well-placed to offer support to victims of trafficking for the purpose of labour exploitation and can put in place support systems. Good communication and coordination between local authorities, including local labour inspectors, and such support services is key to ensure that victims receive the assistance they need and have access to the judiciary.

120. For example in Sweden, it is the responsibility primarily of the unions rather than the authorities to ensure that labour market laws and agreements are followed, and thus unions can help exploited workers to claim their unpaid wages. In Stockholm, the trade unions have established the Union Centre for the Paperless, which provides information and assistance to undocumented migrants on their rights in the labor market, including advice on wages, working conditions and the working environment.<sup>122</sup>

121. In Belgium, FAIRwork Belgium runs a service centre in Brussels which offers specialised support to migrant workers, including providing advice on how to claim unpaid wages.<sup>123</sup> In Germany, ‘Arbeit und Leben’ is a free, confidential, multilingual low-threshold counselling centre in Berlin providing information and counselling on labour law and employment relations for workers from other EU and third countries. They have produced multilingual flyers for Ukrainian refugees with important information on labour rights to be distributed through counselling centres and other channels.<sup>124</sup> In Vienna, the centre UNDOK provides assistance to undocumented workers.<sup>125</sup> The drop-in and counselling centre was established in 2014 with funding from the Federal Ministry for Labour, Social Affairs and Consumer Protection, the Austrian Chamber of Labour and trade unions. It has continued its work despite some funding difficulties to inform undocumented migrant workers about their rights in various languages.<sup>126</sup>

122. In the regions of Southern Italy, the trade union Unione Sindacale di Base (USB) promotes unionisation and coordination with farm workers especially in the areas of Foggia (Puglia) and Rosarno (Calabria). They offer legal assistance to workers in relation to the renewal of residence permits and

<sup>115</sup> HVO Querido, [Amsterdamse Coördinatiepunt Mensenhandel \(ACM\)](#).

<sup>116</sup> GRETA (2018), [Netherlands 2nd evaluation round: Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the Netherlands](#) Council of Europe, Strasbourg, para.199-200.

<sup>117</sup> MEN – Männergesundheitszentrum, [Men Via](#).

<sup>118</sup> Stadt Wien, [Wiener Kinder- und Jugendhilfe, Fachbereich Verselbstständigung, Drehscheibe](#).

<sup>119</sup> GRETA (2020), [Austria 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, para. 236.

<sup>120</sup> IOM, [“Moldova opens first shelter for male victims of trafficking”](#).

<sup>121</sup> Justice and Care (2023), [Modern Slavery Victim Navigator Programme](#).

<sup>122</sup> FCFP - Fackligt Center För Papperslösa, [FCFP - Om oss](#).

<sup>123</sup> Fairwork Belgium, <https://www.fairworkbelgium.be/en/>.

<sup>124</sup> Mujaj E. & Mäkelä V. (2022), p. 16.

<sup>125</sup> UNDOK - Anlaufstelle zur gewerkschaftlichen Unterstützung undokumentiert Arbeitender, <https://undok.at/>.

<sup>126</sup> GRETA (2020), [Austria 3rd](#), p. 48, paragraph 215.

regularisation and in cases of labour rights violations, and support workers' requests for e.g. water, electricity, and transportation.<sup>127</sup>

#### 5.3.4. Key initiatives for local and regional authorities

123. To work towards strengthening assistance to victims, including for labour exploitation, local and regional authorities can put in place several measures.

124. To ensure a victim-centred approach: provide human rights based and gender sensitive assistance not only to formally identified victims of human trafficking, but also to potential victims in vulnerable situations, based on an individual care needs assessment.

125. To ensure assistance to victims even in communities that have less capacities or experience: work towards the creation of regional contact points who can offer support and information to various local professionals who may come into contact with victims of trafficking.

126. To respond to the specific and varied needs of victims: collaborate with other municipalities and regions to pool specialised services to victims of trafficking of all genders, ages and backgrounds, including children, and victims suffering from the effects of trauma, PTSD, and who have specific healthcare needs, or refer victims to services better adapted to their needs.

127. To ensure quality of services: standardise practices to ensure that victims in different municipalities and regions have access to same standard of care, and that they are able to transition between services in a smooth and coordinated way.

128. To facilitate access to legal assistance: cooperate with and refer victims to NGOs, trade unions and other stakeholders that offer legal assistance services.

#### 5.4 Coordination of anti-trafficking action

129. Coordination of the work against trafficking in human beings is essential to ensure a targeted and well-functioning approach at the local and regional levels. In some countries, in addition to national structures set up to ensure the coordination of the anti-trafficking policies and actions, coordination bodies have been set up at the local or regional level to support the work.<sup>128</sup> Such local or regional coordination bodies often have a concrete role in organising or coordinating assistance to victims of trafficking, including children, as well in supporting multidisciplinary co-operation at the grass-root level.

130. It is clear that local and regional authorities alone cannot tackle all aspects of the work against human trafficking, but need support from national authorities who are responsible for overall coordination of anti-trafficking action and have a full picture of the national situation and latest developments. Sufficient guidance and resources must be allocated to local and regional authorities for their work, and national authorities should ensure a smooth flow of information between all levels.

131. Ultimately, the work against trafficking in human beings requires systematic and institutionalised multidisciplinary co-operation between local and regional authorities and stakeholders. This includes elected officials, civil servants such as labour inspectors, police, public prosecutors, judiciary, tax and other relevant inspection authorities (safety and health inspectors, fire and rescue services), as well as representatives of social and health services, victim support services, migrant and employment services, schools, youth centres, shelters, info centres, NGOs, trade unions, and businesses. When possible and appropriate, trafficked persons and persons at risk, including children, should be encouraged to play a role in the design and monitoring of measures.<sup>129</sup>

132. A multi-disciplinary, integrated approach involving all relevant organisations enables the sharing of information and intelligence, and makes it possible for them to complement each other while

<sup>127</sup> Corrado, Alessandra (2018), "[Is Italian Agriculture A "Pull-Factor" for Irregular Migration – And, If So, Why?](#)", Open Society European Policy Institute, p. 29.

<sup>128</sup> See e.g. GRETA (2016), [Compendium of good practices on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings](#) Council of Europe, Strasbourg; GRETA (2020), [Compendium of good practices in addressing trafficking in human beings for the purpose of labour exploitation](#), Council of Europe, Strasbourg.

<sup>129</sup> Committee of Ministers of the Council of Europe (2022), "[Recommendation CM/Rec\(2022\)21 of the Committee of Ministers to member States on preventing and combating trafficking in human beings for the purpose of labour exploitation](#)".

respecting their different roles and mandates, data protection standards and safeguards. In times of austerity multi-agency co-operation allows various authorities to pool scarce resources.

#### 5.4.1. Main challenges

133. If local and regional authorities are not involved in the implementation of national anti-trafficking efforts, it results in gaps, which may result in overlapping work and structures and overextension of scarce resources, poor planning, conflicting priorities and lack of capacity. Coordination of work between different local and regional authorities and actors allows synergies to form, which can be used to improve the system in place and to make it more efficient. Lack of co-operation with victim services and NGOs is also a missed opportunity.

134. A lack of specialisation and designated persons may result in situations where each case is dealt with differently, and professionals lack standardised guidelines or procedures. This creates a situation of unequal and random treatment of victims. Each local authority may conduct their separate inspections without the ability to share their intelligence or data, which could be used to identify cases of trafficking or labour exploitation. At worst, a lack of coordination also creates administrative hurdles and unnecessary overlaps, burdening local authorities and services.

135. Insufficient co-operation and exchange of data may result in situations where criminals utilise the lack of oversight and control to expand their operations to new areas or regions and continue exploiting vulnerable persons. Economic and other disparities between urban and rural areas and between different regions also create opportunities for traffickers, and enable the continuation of exploitation. In smaller and rural communities, the traffickers may be well established and influential members of the local community. This may hamper the acknowledgement of wrongdoings, especially if the services provided by the traffickers – e.g., in catering/restaurants, agriculture, construction – are used by decision-makers and community members alike.

136. Indeed, corruption can be linked to human trafficking and fuel every type of exploitative purpose, from sexual exploitation to forced labour or organ removal. Elected officials and practitioners may be subject to corruption, with individual front-line actors being most vulnerable. Corruption may be linked to recruitment and facilitation of entry on the basis of false papers, charging of illegal recruitment fees or lack of controls in place because of advance warnings by those involved corrupt or turning and blind eye during inspections. Private sector actors, such as supervisors or internal inspectors in risk sectors as well as labour recruiters and accommodation providers may be bribed to ignore the exploitative conditions or the fact that some workers are undocumented migrants.<sup>130</sup>

#### 5.4.2. Solutions

137. Vertical co-operation and involvement of local and regional authorities in the development of national anti-trafficking strategies is a precondition for coherent and coordinated anti-trafficking policies at all levels of government. The manual on multidisciplinary co-operation against trafficking in human beings for labour exploitation “Teamwork!”, developed by the Dutch presidency of the Council of the European Union in co-operation with Luxembourg, Slovakia and Malta, underlines the importance of national co-operation structures, clearly outlining importance of involving local and regional authorities therein, and provides concrete examples on how such structures could take form.<sup>131</sup>

138. Depending on the country and the system in question, there are different ways in which regional actors are involved in vertical co-operation ensuring a targeted approach from the national level to the regional and local levels. In 2016, the Council of the Baltic Sea States launches guidelines for stepping up actions against human trafficking at the local level. The guidelines are available in 11 languages.<sup>132</sup>

139. There are also examples of horizontal co-operation – between and within municipalities – in the work against human trafficking. Within municipalities, there are examples of a coordinated approach. In the Netherlands, in Amsterdam, two staff members work solely on trafficking related issues. In 2022, the municipality provided some 900,000 euros per year for the purpose of combating trafficking, including

<sup>130</sup> UNODC (2023), [Emerging knowledge and practice regarding the prevention of and response to corruption in the context of trafficking in persons](#), background paper, p. 2-6.

<sup>131</sup> TeamWork! (2016), [Manual for experts on multidisciplinary cooperation against trafficking in human beings for labour exploitation](#), Government of the Netherlands, Amsterdam.

<sup>132</sup> CBSS (2016).

for prevention and training of municipal officials (building inspectors, passport officials, staff registering Ukrainian refugees, municipal inspectors of sex work permits, etc.).<sup>133</sup> Similarly in Austria, the Human Rights Office of the City of Vienna coordinates human rights as a cross-cutting topic in all areas of the Vienna City Administration and cooperates closely with other municipal departments, public institutions, NGOs, civil society initiatives, and experts in the fights against human trafficking.<sup>134</sup>

140. In Poland, regional anti-trafficking teams have been set up in all 16 regions (voivodeships). They are composed of representatives of public institutions, law enforcement authorities (Police and Border Guard), Prosecutor's Offices, courts, labour inspectorates and NGOs. Their role is to coordinate prevention activities, assistance to victims, training of professionals, as well as sharing information and experience on trafficking related issues.<sup>135</sup>

141. In Bulgaria, Local Commissions for Combating Trafficking in Human Beings have been set up in 10 of the country's 28 regions (Blagoevgrad, Burgas, Montana, Pazardzhik, Pleven, Plovdiv, Ruse, Varna, Sliven and Veliko Tarnovo).<sup>136</sup> The local structures involve representatives from various local agencies, including NGOs. They identify and refer victims, implement preventative work among vulnerable populations such as the Roma, organise regular awareness raising campaigns in schools and organise round tables, trainings and other capacity building activities for professionals at the local level.<sup>137</sup> The strength of the Commissions is that they are part of the local administrations and use their premises and infrastructure.<sup>138</sup> Similarly, in Albania there are Regional Anti-Trafficking Committees which operate in all 12 regions of the country. These committees address trafficking and related issues through local action plans.<sup>139</sup>

142. In Latvia, the city of Liepaja has established coordination group on action against trafficking in human beings. It is cross-sectoral group that can cover main issues of trafficking prevention, identification, and continuous support after rehabilitation. All members of this group have received training and are specialists in policy against trafficking.<sup>140</sup> The group did not meet during the COVID-19 pandemic, but renewed meetings in December 2023.<sup>141</sup>

143. In Finland, in the Helsinki region, a multidisciplinary working group of experts encountering children and youth in their work was established in 2022, when the need to increase the understanding of trafficking in children and youth and to develop multidisciplinary co-operation was identified. Approximately 15 professionals participate actively in working group. The group includes representatives from social and health care services in Helsinki, child welfare, after-care services, youth work, the NGO Victim Support Finland, the Helsinki police department (preventive activities, an investigation team specialising in human trafficking), the Eastern Uusimaa police department, and the National Bureau of Investigation as well as a pupil welfare. The working group has strived to define issues and good practices related to, for example, the prevention of exploitation, identification and assistance to child and youth victims.<sup>142</sup>

144. There are also examples of horizontal regional co-operation that crosses international borders. For example, the City of Amsterdam has created the European Cities and Regions on Human Trafficking (ECTR) network, which organises multistakeholder meetings and workshops to highlight innovative practices, identify partnership opportunities within and among cities, national governments, and supranational institutions. A meeting organised in 2024 brought together European and US city officials with representatives of local law enforcement agencies, the EU Commission, Europol, the Regional Implementation Initiative on Preventing & Combating Human Trafficking, and academic experts.<sup>143</sup>

<sup>133</sup> GRETA (2023), [Netherlands 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, para. 21.

<sup>134</sup> City of Vienna, [Human Rights Office of the City of Vienna](#).

<sup>135</sup> GRETA (2023), [Poland 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, para. 152.

<sup>136</sup> GRETA (2021), [Bulgaria 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#) (2021), Council of Europe, Strasbourg, para. 20.

<sup>137</sup> CBSS (2019), [Bulgaria](#); GRETA (2020a), [Compendium](#), p. 27.; CSD - Center for the Study of Democracy (2024), Information provided via email.

<sup>138</sup> CSD (2024).

<sup>139</sup> GRETA (2020), [Albania 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, para. 21.

<sup>140</sup> HEUNI (2022), [Summary of the best practices collected](#), pp. 54-55.

<sup>141</sup> Information provided by Agnese Zile, Anti-Trafficking Coordinator of Latvia, 4 June 2024.

<sup>142</sup> Pihlaja, Saara (2024), "Personal communication 27.5.2004", Ministry of Justice, Finland.

<sup>143</sup> GMF, [Cities and Human Trafficking](#), 24 May 2024.; see also GRETA (2023), [Netherlands 3rd](#), para. 22.

145. Similarly, in the Danube region, the Danube cities against trafficking network has been set up to increase know-how and encourage cross-sectoral co-operation. The Network works together with the Regional Implementation Initiative to enhance mutual learning and networking for a coordinated approach within countries and regions as well as across the Danube Region and has organised e.g., roundtables in Vienna and Ljubljana with representatives from local and national public authorities, research, international organisations and NGOs.<sup>144</sup>

146. Finally, associations of local and regional authorities can also play a key role in ensuring local approach to tackling human trafficking. In the Netherlands, the Association of Netherlands Municipalities commissioned the Centre for Crime Prevention and Security to prepare a digital toolkit to assist municipalities in the development of their approach to human trafficking.<sup>145</sup> The toolkit, called “Kompas”, functions as a handbook with policy tools, and provides detailed answers to the questions of what, how and with whom trafficking can be prevented and addressed. It can also be used for training purposes as the toolkit includes information about, among other things, the nature and extent of human trafficking, legislation and the roles and responsibilities of municipalities as well as structures and co-operation partners.<sup>146</sup> In Finland, the Association of Finnish municipalities has set up a special unit for advising their members in public procurement, including in prevention of labour exploitation in their procurement processes.<sup>147</sup>

#### 5.4.3. Focus on labour exploitation: joint inspections and multi-authority co-operation

147. Joint inspections and/or multiauthority co-operation where labour inspectors work together with the local police, tax authorities and fire, safety and health and food inspectors is a concrete way to combat labour exploitation at the local and regional levels via a coordinated approach. Adequate pre-planning of the inspection (e.g., roles, competences and the possibilities and limitations) is vital to ensure successful outcomes.<sup>148</sup>

148. In Finland, the model for joint inspections was piloted in the city of Kuopio. The Kuopio model is built on an enhanced co-operation between inspection authorities in joint inspections of berry farms, and is a good example of a planned and structured joint inspection activity. The model was established when the police, the labour inspectorate and the tax authorities together created a co-operation model for intensified control inspections of berry farms. The rescue and food safety authorities were also invited. The inspections were targeted at farms that had been selected based on a preliminary analysis by the authorities, and where migrant seasonal workers were employed. Each actor had their clearly defined role during the inspection. The authorities also organised a joint debriefing session afterwards to discuss the follow up action.<sup>149</sup> The local model was subsequently used to create a more coordinated approach at the national level.<sup>150</sup>

149. In 2022-2023 the Finnish labour inspectorates, which function under the regional authorities, established regional forums for strengthening multiauthority co-operation in 7 regions across Finland. The establishment of these forums has facilitated better exchange of information and co-operation, but also enabled the unification of regional operating methods and made it possible to unify various control models and instructions without forgetting regional needs.<sup>151</sup> Each region has designated inspectors specialised in monitoring the use of migrant labour, and they have the mandate to refer potential victims to assistance.<sup>152</sup>

150. In Norway, labour market crime centres (so-called A-krim-centres) have been established to tackle work related criminality, including labour exploitation in 8 regions.<sup>153</sup> The centres facilitate regional co-operation between the Norwegian Tax Agency, the Police, the Norwegian Labor Inspection Authority,

<sup>144</sup> Danube Region Strategy. [Danube Cities Against Human Trafficking \(D-CAHT\)](#).

<sup>145</sup> GRETA (2023), [Netherlands 3rd evaluation round](#), para. 21.

<sup>146</sup> Kompas, [Aanpak Mensenhandel](#).

<sup>147</sup> Kuntaliitto, [Julkisten hankintojen neuvontayksikkö](#).

<sup>148</sup> Kuukasjärvi K., Rikkilä S. and Kankaanranta T. (2022), ["Matalat kynnykset on helppointa ylittää" : työperäisen hyväksikäytön ja ihmiskaupan torjunta moniviranomaistoiminnassa](#), Poliisiammattikorkeakoulu, Tampere.

<sup>149</sup> Ylinen P. et al. (2020), ["Uncovering labour trafficking. Investigation tool for law enforcement and checklist for labour inspectors"](#), HEUNI, Helsinki, p.18.

<sup>150</sup> Kuukasjärvi K et al. (2022).

<sup>151</sup> AVI - Aluehallintovirasto (2024), *TS-MOVI-hanke 2021–2023 - Työsuojeluhallinnon moniviranomaisyhteistyön mallintaminen ja kehittäminen pimeän työn torjunnassa*, Hankeraportti, 4 April 2024.

<sup>152</sup> Jokinen A. et al. (2023), ["Review of actions against labour trafficking in Finland"](#), HEUNI, Helsinki.

<sup>153</sup> GRETA (2022), [Norway 3rd evaluation round: Access to justice and effective remedies for victims of trafficking in human beings](#), Council of Europe, Strasbourg, para. 118.

the Norwegian Labour and Welfare Administration (NAV) and the Customs Agency. Other public control agencies are contacted in individual cases if needed.<sup>154</sup> Sweden has adopted a similar model to tackle labour market crime, and A-krim-centres were opened in 7 locations in 2022-2023, in connection with the police departments in Umeå, Uppsala, Örebro, Stockholm, Göteborg, Norrköping and Malmö.<sup>155</sup>

151. Moreover, co-operation between the regional authorities in Belgium and France is a good example of international co-operation between regions. The Labour Inspectorate for the Control of Social Protection Laws in Brussels and the Regional Directorate for the Economy, Employment, Labour and Solidarity (Hauts-de-France et Grand Est) in France organise exchanges, which allow Belgian and French agents to cross the border to observe their peers and exchange inspection practices for several days. Such co-operation also facilitates planning of concerted or joint actions by both regional authorities in risk sectors.<sup>156</sup>

#### **5.4.4. Key initiatives for local and regional authorities**

152. To work towards improving coordination of anti-trafficking actions, including for labour exploitation, local and regional authorities can put in place several measures.

153. To avoid overlapping work and structures as well as overextension of scarce resources: develop co-operation at the local and regional levels by forming multidisciplinary networks or teams involving different professionals to facilitate better coordination of anti-trafficking actions as well as exchange of data and pooling of resources.

154. To strengthen detection of potential cases of trafficking and referral of victims: conduct joint inspections involving different relevant agencies and local authorities, so as to combine their different mandates, powers and expertise in the process.

155. To facilitate sharing of best practices in various aspects of the work against trafficking: establishment of networks within and between municipalities, cities, and regions, including international and inter-regional co-operation allows mutually beneficial exchanges of lessons learned. Involve national associations of municipalities who can facilitate such mutual learning processes.

#### **5.4.5. Key initiatives for central government/national authorities**

156. The coordination of national anti-trafficking actions requires vertical coordination and consultation of local and regional levels in national policies. Therefore, with regard to better national coordination, central government/national authorities should also put in place several measures.

157. To ensure policy relevance: organise regular consultation of local and regional officials in the development of national anti-trafficking policies, and provide clear guidance on implementation of new actions and duties, including collection of data to form a full picture of the trafficking situation.

158. To avoid conflicting priorities between different local authorities: ensure a coherent approach at the national level, with clear duties and mandates for different authorities, which prioritise human and victim's rights and encourage safe reporting also for undocumented migrants and persons in precarious situations.

159. To accommodate for the financial constraints of local and regional authorities: support the establishment of local and regional multidisciplinary networks and teams and ensure adequate funding or reimbursement options for local and regional authorities to provide specialised support to victims of trafficking, as well as for provision of low-threshold and outreach services to vulnerable populations.

160. To address disparities between urban and rural areas: make use of economic development strategies at regional and local level to create opportunities and synergies to address the risk of trafficking, including through the development of inter-regional and international co-operation.

<sup>154</sup> Skatteetaten, "[A-krimssenteret i Oslo: Varebilbransjen i Oslo og omegn er preget av arbeidslivskriminalitet](#)", 7 February 2023.

<sup>155</sup> Arbetsmiljö Verket, "[Så jobbar myndigheterna mot arbetslivskriminalitet](#)".

<sup>156</sup> ELA (2023), p. 75.

## 6. CONCLUSIONS

161. In conclusion, trafficking in human beings is a multifaceted crime which has far-reaching and serious impacts on its victims and society at large. To address this crime, this report argues that all actions against trafficking should be approached from a human rights perspective, meaning that the rights of victims of trafficking are placed at the centre of all efforts to prevent and combat trafficking and to protect, assist and provide redress to victims. While persons of all genders, ages and backgrounds may be victims, those who are in the most precarious situations such as undocumented migrants, asylum seekers and unaccompanied children, including those fleeing the war in Ukraine, are at the highest risk.

162. Human trafficking is a crime in which the perpetrator takes advantage of the victims' vulnerabilities, dependence and lack of information, which makes it very difficult for the victims to disclose their experiences. Therefore, it is important to facilitate safe reporting options and focus on building trust and providing future perspectives for victims to entice them to report the crimes and to seek assistance.

163. Local and regional authorities are well placed to take action against trafficking, engage with vulnerable populations, build trust, provide support and enable safe reporting, which ultimately facilitates better investigation of the crime and realisation of criminal liability. Local and regional authorities are often in the position of first responders. They encounter potential victims, refer them to services and provide support and assistance to victims. Therefore, it is important to strengthen their capacity to address trafficking throughout all administrative bodies and services and to ensure that they receive adequate guidance and support from national authorities in the process.

164. This report illustrates the growing number of cases of labour exploitation across Europe and argued that, if this kind of criminality is left undressed at the local level, it can create a breeding ground for further exploitation and abuse. Traffickers and exploiters are able to identify the gaps in the local approach and may take advantage of these, normalising labour exploitation within certain sectors and/or regions. It is therefore crucial that cities, municipalities and regions ensure that they do not contribute to the problem through their public procurement, and that their own supply chains are free from labour exploitation. Instead, they should promote opportunities for socially responsible companies, for example, by awarding contracts to suppliers who can document safe, legal and fair working conditions, and to ensure ethical recruitment of workers.

165. Referring to the financial constraints of local and regional authorities, the report underlines that, by focusing on detecting risk areas, sectors and locations, local and regional authorities can focus limited resources on places where the risks are the highest, facilitate sharing of information to form a picture of the local circumstances on the basis of risk profiling and conduct joint inspections involving different relevant services. Increasing knowledge and building capacity among local service providers allows local and regional authorities to strengthen detection of victims, and to ensure a coordinated approach in referring them to further services. The use of administrative procedures such as licensing and zoning regulations is another example of how municipalities can interfere with exploitative practices. Such an approach enables the pooling of resources and facilitates exchange of multidisciplinary expertise and best practices.

166. Targeted information campaigns in different languages and provision of outreach services allow local and regional authorities to disseminate information on rights to vulnerable populations and refer those affected by exploitation to further services. Providing human rights based and gender sensitive assistance, not only to formally identified victims of human trafficking but also to potential victims in vulnerable situations, is the cornerstone of a victim-centred approach. Local and regional actors are centrally placed to provide such assistance directly, or in co-operation with or through funding the work of NGOs and other actors, and to ensure the provision of measures that are low-threshold, adaptable to the individual needs of the victims, and informed by experiences of victims and peers are of utmost importance.

167. To enable all the above, the particular role of local and regional policy makers cannot be sufficiently emphasised. In their function as opinion leaders, they have the power to put the fight against human trafficking on the local political agenda and to refrain from using rhetoric that criminalises victims of human trafficking. Their role in the creation of ethical, human-rights centred procurement policies is crucial in order to ensure that public spending does not contribute to human rights violations. The recommendations outlined in the present report cannot only come to fruition without the political support of elected officials at local and regional levels and their commitment to combating this heinous crime in their communities.

168. Finally, it needs to be underlined that, while local and regional authorities are centrally placed to take action against human trafficking, they cannot address it alone. There is a clear need for multi-level and the co-operation and coordination, including horizontal co-operation – between and within municipalities – in the work against human trafficking. The establishment of networks at local and regional levels and the involvement of associations of municipalities as well as cross-border regional co-operation and international networks allow local and regional actors to share experiences and to develop joint solutions to common challenges faced by all. National authorities must ensure that they can provide guidance, training and adequate resources to local-level actors.