

**Committee of the Parties
to the Council of Europe Convention
on Action against Trafficking in Human Beings**



**Recommendation CP/Rec(2024)02
on the implementation of the Council of Europe Convention
on Action against Trafficking in Human Beings
by Finland**

*adopted at the 34th meeting of the Committee of the Parties
on 21 June 2024*

The Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings (hereinafter referred to as "the Convention"), acting under the terms of Article 38(7) of the Convention;

Having regard to the purposes of the Convention to prevent and combat trafficking in human beings, while guaranteeing gender equality, protect the human rights of victims of trafficking, design a comprehensive framework for the protection and assistance of victims and witnesses, ensure the effective investigation and prosecution of the offences related to trafficking in human beings, and promote international co-operation;

Bearing in mind the provisions of Article 36(1) of the Convention concerning the monitoring role of the Group of Experts on Action against Trafficking in Human Beings (GRETA) in the implementation of the Convention;

Having regard to the Rules of Procedure of the Committee of the Parties;

Having regard to the instrument of ratification deposited by Finland on 30 May 2012;

Recalling Committee of the Parties' Recommendation CP/Rec(2019)05 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Finland and the report of the Finnish authorities on measures taken to comply with this recommendation, submitted on 16 October 2020;

Having examined the third report concerning the implementation of the Convention by Finland, adopted by GRETA at its 50th meeting (18-22 March 2024), as well as the comments of the Finnish Government received on 10 May 2024;

Bearing in mind the focus of the third evaluation round of the Convention on access to justice and effective remedies for victims of trafficking;

Considering the conclusions and proposals contained in Appendix I of GRETA's third report on topics related to the third evaluation round and follow-up topics specific to Finland;

Welcoming the measures taken and progress achieved by the Finnish authorities in implementing the Convention, and in particular:

- the further development of the legislative framework related to trafficking in human beings, including the disconnection of the formal identification of victims of trafficking from the criminal investigation;
- the adoption of the National Action Plan against Human Trafficking for the period 2021–2023, following a transparent and inclusive procedure and taking into account recommendations made in GRETA's previous reports;
- the steps taken to develop specialisation amongst police investigators, prosecutors and judges to deal with human trafficking cases and the training provided to them;
- the measures taken to prevent and combat human trafficking for the purpose of labour exploitation, in particular the strengthening of the mandate and resources of labour inspectors and the adoption of several legislative changes and policy documents to prevent the exploitation of migrant workers;
- the amendment to the Code of Judicial Procedure extending the possibility of video-recording the questioning of a victim of human trafficking for its use as evidence in a trial;
- the engagement in international co-operation in the field of action against human trafficking.

A. Recommends that the Government of Finland take measures to address the following issues for immediate action¹ identified in GRETA's report:

1. make additional efforts to guarantee effective access to compensation for victims of human trafficking, in particular by:
 - ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain from the exploitation of the victim, is part of the criminal investigations with a view to supporting compensation claims in court;
 - systematically carrying out financial investigations to locate executable assets or income of offenders in human trafficking cases with a view to freezing or seizing them to secure future compensation claims by victims, and ensuring that victims have effective access to those assets or income;
 - ensuring that the length of the judicial proceedings (criminal and civil) to claim compensation from the perpetrator is reasonable;
 - reviewing the eligibility criteria for state compensation, in particular the criterion of significant damage, with a view to making state compensation available to all victims of trafficking (paragraph 81);
2. strengthen the criminal justice response to human trafficking, and in particular:
 - ensure that human trafficking offences are proactively and promptly investigated, making use of special investigation techniques in order to gather material, documentary, financial and digital evidence, so that there is less reliance on testimony by victims or witnesses;
 - ensure that human trafficking offences, including for the purpose of labour exploitation, are classified as such every time the circumstances of a case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted;
 - ensure that the length of court proceedings in human trafficking cases is reasonable, in line with the case-law of the European Court of Human Rights (related to Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ) (paragraph 102);

¹ The number of the paragraph setting out GRETA's proposals in the report is indicated in brackets.

3. review the application of the Dublin Procedure to presumed victims of human trafficking and conduct risk assessments in order to prevent victims being returned to the country where they first applied for asylum, but where they face the risk of being re-trafficked (paragraph 183);
 4. take further steps to comply with the obligations under Article 12 of the Convention and ensure that all victims of trafficking, including men, are provided with accommodation that is safe and suitable for their needs (paragraph 200);
 5. take additional measures to prevent trafficking of children, identify child victims of trafficking and provide appropriate assistance to them, and in particular:
 - take further actions for reducing the risk of children going missing from state care, by sensitising them to the risks of human trafficking and sexual abuses and providing them with secure accommodation, appropriate services and a sufficient number of appropriately trained supervisors;
 - ensure that relevant actors take a proactive approach and increase their outreach work to identify child victims of trafficking, by paying particular attention to children absconding from institutional care, children trafficked for forced criminality, unaccompanied children and children recruited and/or exploited online (paragraph 210);
 6. take additional measures to ensure that victims of trafficking can fully benefit from the right to obtain a residence permit, including on grounds of their personal situation, by amending the Aliens Act, providing the relevant staff of the Immigration Service with additional instructions and training, and ensuring the issuing of residence permits within a reasonable time (paragraph 224).
- B. Recommends that the Finnish authorities take measures to implement the other proposals for action listed in Appendix 1 of GRETA's third evaluation report.
- C. Requests the Finnish Government to report to the Committee of the Parties on the measures taken to comply with this recommendation by **21 June 2026**.
- D. Invites the Finnish Government to continue the dialogue in progress with GRETA and to keep GRETA regularly informed of the measures taken in response to GRETA's conclusions.