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G R E T A

Group of Experts on Action
against Trafficking in Human Beings

Reply of the Government of Iceland to the Questionnaire for the evaluation of the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the Parties

Fourth evaluation round

Thematic focus: Addressing vulnerabilities to trafficking in human beings

Reply submitted on 5 October 2026

Introduction

In accordance with Article 38, paragraph 1, of the Convention on Action against Trafficking in Human Beings ("the Convention"), GRETA evaluates the implementation of the Convention following a procedure divided into rounds. At the beginning of each round, GRETA selects the specific provisions on which the evaluation procedure is based.

The first round of monitoring of the Convention provided an overview of its implementation by States Parties. The second evaluation round of the Convention examined the impact of legislative, policy and practical measures on the prevention of THB, the protection of the rights of victims of trafficking, and the prosecution of traffickers, paying particular attention to measures taken to address new trends in human trafficking, in particular trafficking for the purpose of labour exploitation, and the vulnerability of children to trafficking. The third evaluation round focused on trafficking victims' access to justice and effective remedies.

GRETA has decided that the fourth evaluation round of the Convention will focus on vulnerabilities to human trafficking and measures taken by States Parties to prevent them, detect and support vulnerable victims, and punish the offenders. This includes a focus on the use of information and communication technology (ICT), which brings structural changes to the way offenders operate and exacerbates existing vulnerabilities.[1]

A number of provisions of the Convention establishing substantive and procedural obligations are relevant to this topic. The concept of "vulnerability" appears in Articles 4 (definitions), 5 (prevention of trafficking in human beings) and 12 (assistance to victims) of the Convention. According to paragraph 83 of the Explanatory report to the Convention, "by abuse of a position of vulnerability is meant abuse of any situation in which the person involved has no real and acceptable alternative to submitting to the abuse. The vulnerability may be of any kind, whether physical, psychological, emotional, family-related, social or economic. The situation might, for example, involve insecurity or illegality of the victim's administrative status, economic dependence or fragile health. In short, the situation can be any state of hardship in which a human being is impelled to accept being exploited. Persons abusing such a situation flagrantly infringe human rights and violate human dignity and integrity, which no one can validly renounce."

GRETA refers to the ICAT Issue Brief No. 12/2022 on Addressing vulnerability to trafficking in persons which refers to vulnerability as "those inherent, environmental or contextual factors that increase the susceptibility of an individual or group to being trafficked". It classifies vulnerability factors in three categories: personal (e.g. age, gender, ethnicity, disability), situational (e.g. destitution, unemployment, legal status) and contextual (e.g. discriminatory laws, policies and social norms, armed conflicts, crises) factors, which interact and may increase the risk of human trafficking for certain individuals, groups and/or communities.[2] Vulnerability to human trafficking is also subject to intersectional factors, such as gender, belonging to a minority group and socio-economic status.

Applying a socio-ecological approach to the analysis of vulnerability to human trafficking demonstrates how different risk factors influence vulnerability, and how protective factors may reduce the risk of victimisation by increasing resilience.[3] The socio-ecological model considers the complex interplay between individual, relationship, community and societal factors. It helps to understand how anti-trafficking strategies should: (a) reduce the vulnerability of individuals, (b) work with the communities (which may also include relationships) concerned to ensure that their practices or current dynamics

[1] Paolo Campana, Online and Technology-Facilitated Trafficking in Human Beings, Council of Europe, April 2022.

[2] ICAT Issue Brief No. 12 on Addressing vulnerability to trafficking in persons - Search (bing.com)

[3] https://www.avoiceforcentraloregon.com/uploads/1/3/9/9/139904528/socio_ecological_model_and_trafficking.pdf

do not exacerbate or contribute to vulnerabilities to human trafficking and, (c) change a number of system-driven or structural elements (such as policies) so that they do not facilitate but discourage an environment conducive to human trafficking.

In addition to the thematic focus on vulnerabilities to human trafficking, GRETA has decided that each State Party will receive country-specific follow-up questions related to recommendations not implemented or partially implemented after the third evaluation round.

States Parties are requested to transmit to GRETA a reply to this questionnaire within four months from the date it was sent. The reply to the questionnaire should be submitted in one of the official languages of the Council of Europe (English and French), and preferably also in the original language. Where appropriate, in order to avoid unnecessary repetition, the reply may refer to information contained in the report submitted by the national authorities on measures taken to comply with the Committee of the Parties' recommendation concerning the implementation of the proposals made in GRETA's third evaluation report. States Parties should provide links, copies or extracts of relevant legislation, regulations, national action plans and case law mentioned in the reply to the questionnaire, in the original language and, wherever possible, also in one of the official languages of the Council of Europe.

A variety of stakeholders and civil society representatives should be effectively consulted in the preparation of the reply to the questionnaire, to ensure that the information provided is as comprehensive as possible.

Part I – Addressing vulnerabilities to trafficking in human beings

I. PREVENTION (Articles 5, 6 and 7)

1. Do you have specific data/research/analysis of what makes people vulnerable to THB in your country? Please provide information on the categories/groups of people identified as being at risk of becoming victims of human trafficking, and how they are addressed in the national anti-trafficking strategy and/or action plan. Have you identified geographical regions or economic sectors in your country as particularly vulnerable to THB, and how do you address them in your strategy or policy?

The National Commissioner of the Icelandic Police published late 2025 “The Organized Crime Assessment 2021–2025” that highlights Iceland's open economy, dependence on international labour and growing tourism industry create opportunities that can be exploited by organized criminal groups. Organized crime networks often make use of legitimate migration flows, labour recruitment channels, and transnational connections to facilitate criminal activities, including labour exploitation and human trafficking. Groups assessed as being particularly vulnerable include:

- Migrant workers, especially those employed through temporary work arrangements or subcontracting chains.
- Foreign nationals with limited Icelandic or English language skills and limited knowledge of their rights.
- Asylum seekers and persons with uncertain residence status.
- Victims of social and economic marginalization.
- Women vulnerable to sexual exploitation.
- Unaccompanied minors and other children at risk of online grooming or exploitation.

The organized crime assessment further notes that criminal actors exploit vulnerabilities arising from economic hardship, social isolation, dependency relationships, debt, and lack of familiarity with Icelandic institutions and labour protections.

Bjarkarhlíð systematically collects data using a detailed questionnaire that are used in interviews with victims of THB. An annual report based on the findings from the interviews is published on Bjarkarhlíð’s website. The data available for 2023-2025 indicate that the principal vulnerability factors identified in trafficking cases in Iceland include migration-related circumstances, recruitment practices, economic insecurity, language barriers, insecure residence status, indebtedness, dependence on employers for employment or accommodation, and social isolation. Labour trafficking remained the most frequently identified form of exploitation during the period, with many cases involving migrant workers in sectors where employers or intermediaries exercised significant influence over employment, accommodation and immigration-related arrangements.

Bjarkarhlíð has furthermore identified several groups whose circumstances may increase vulnerability to trafficking, including migrant workers recruited through employers or staffing agencies, persons dependent on employers for work permits or residence status, applicants for international protection, individuals without secure residence status or an Icelandic social security number, and persons whose employment, accommodation and immigration arrangements are controlled by the same individual or organisation. Au pairs have also been identified as a potentially vulnerable group due to their dependence on host families and relative isolation within private households.

The data additionally point to vulnerabilities among persons experiencing poverty, homelessness, substance use or other forms of social marginalisation. Language barriers were particularly prominent, with between 65% and 92% of identified victims during the period speaking neither Icelandic nor English.

While the nationality profile varied between years, recurring patterns were observed among identified victims, particularly migrant workers from Vietnam in labour trafficking cases and women from several countries in identified cases of sexual exploitation.

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The draft of Iceland's new National Action Plan against Trafficking in Human Beings (2026-2030), published on the Government's consultation portal at the end of August, demonstrates an awareness of the factors that increase vulnerability to THB. The introduction highlights the abuse of a victim's position of vulnerability, as reflected in the provision on THB of Art. 227a(1) in the General Penal Code, as amended by Act No. 79/2021, particularly with regard to the issue of consent. It explicitly states that children can never consent to their exploitation. The draft further provides that gender equality and equal treatment considerations shall be integrated into the implementation of all measures through an intersectional approach. It also emphasises that implementation shall be guided by the principle of the best interests of the child, in accordance with the Convention on the Rights of the Child.

The Government Offices' Steering Group against THB convenes consultation meetings twice a year with relevant stakeholders, including public authorities and non-governmental organisations (NGOs). These meetings address progress in the implementation of the National Action Plan, developments in knowledge and practice, including emerging trends and evolving vulnerabilities, as well as challenges encountered in implementation. The Steering Group is mandated to propose amendments to the National Action Plan to the Minister of Justice where necessary to address emerging challenges and developments.

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While trafficking can occur in various environments, available intelligence and national assessments suggest heightened risks in sectors characterized by a significant reliance on foreign labour, temporary or seasonal employment, multi-layered subcontracting arrangements and limited oversight of working conditions. The sectors generally considered most vulnerable include construction, tourism, cleaning and facility services, domestic work, restaurants and other service industries (nail salons, etc).

The sectors identified in Bjarkarhlíð's data for 2023-2025 included restaurants and catering, construction, tourism, fish processing, cleaning, food-related services, and beauty establishments, including massage and nail salons. Restaurants and catering businesses featured prominently in the 2024 cases, including a major investigation involving Vietnamese workers. In 2025, labour trafficking cases were identified across a broader range of sectors, including tourism, construction, fish processing and beauty establishments. This may reflect increased identification efforts across different sectors rather than a change in the prevalence of trafficking.

No specific region of Iceland has been identified as a trafficking "hotspot." However, the Reykjavík metropolitan area, and Suðurnes district (border control area with national airport) as the country's principal population and economic centre, naturally accounts for most identified cases and intelligence reporting. Reykjavik metropolitan area is the region where the exploitation for most part takes place. The organized crime assessment also places particular emphasis on Iceland's borders. As an island nation and part of the Schengen area, Iceland relies on effective border management/assessment and international cooperation to identify criminal actors and potential victims. The report notes that organized crime groups increasingly operate across borders and make use of international travel and

migration routes. Consequently, Keflavík International Airport and other entry points are viewed as strategically important locations for detecting indicators of human trafficking.

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The Government Strategy and Action Plan against Labour-Market Crime 2026–2028 recognises labour trafficking as one of the serious forms of labour-market crime and identifies migrant workers as a group that may be particularly vulnerable to labour-market violations, including because of limited knowledge of their rights and obligations in Iceland.

A central element of the Strategy is to strengthen data collection, analysis and risk-based workplace surveillance. The cooperation platform between the Administration of Occupational Safety and Health, the police and the tax authorities is to analyse available information and use it to identify where violations are most likely to occur. Workplace inspections and other enforcement measures can consequently be targeted at sectors, workplaces or activities where the analysis indicates a heightened risk, rather than relying on a predetermined list of high-risk sectors or geographical areas.

The Strategy also provides for active screening for possible labour-market crime and THB in connection with applications for residence and work permits. Where risk factors are identified, these may be followed up through continued monitoring, workplace visits or targeted information and awareness-raising.

2. What specific measures are taken to reduce children's vulnerability to THB by creating a protective environment for children? Please provide information in the following areas:

a. protecting children's rights from attitudes, customs, behaviour and practices that can have an adverse effect (including child, early and forced marriage, and illegal adoption);

Iceland protects children from harmful attitudes, customs and practices through measures aimed at strengthening children's knowledge of their rights, access to trusted adults and coordinated support services.

The UN Convention on the Rights of the Child has been incorporated into Icelandic law, and the Child Protection Act No. 80/2002 protects children from violence and degrading treatment. Cultural, religious or customary considerations cannot justify conduct that infringes upon a child's rights, safety or dignity.

The Act on the Integration of Services in the Interest of Children's Prosperity No. 86/2021 establishes a framework for early identification and intervention where children may be at risk. Schools, health-care providers and municipal social services are required to identify indications that a child's needs are not being met and respond accordingly. Children and parents have access to a designated contact person within the child's immediate environment and, where more extensive support is needed, a case manager and multidisciplinary support team may coordinate services. This framework supports the early identification of violence, coercive control, social isolation and other circumstances that may increase vulnerability to THB.

Schools also play an important preventive role. Equality, health and well-being, democracy and human rights are among the fundamental pillars of the National Curriculum Guide. Life-skills education promotes understanding of respectful relationships, rights and responsibilities, personal boundaries,

consent and help-seeking, thereby helping children recognise abusive or exploitative behaviour and challenge harmful stereotypes and social norms.

The Directorate of Education and School Services further supports a protective school environment through initiatives such as *Heillaspor* (Nurture), an educational framework designed to support children and young people experiencing social, emotional, behavioural or mental health barriers to learning. Based on the Six Nurture Principles, the programme promotes safety, inclusion, participation and supportive relationships in schools and leisure activities.

Additional preventive measures are included in the National Action Plan on Gender-based Violence against Women 2026-2030, which provides for the mapping of honour-based violence and negative social control affecting women and girls, as well as training for professionals on identifying and responding to such practices.

Iceland has also taken specific measures to prevent child and forced marriage. Amendments to the Marriage Act No. 31/1993 adopted in 2022 abolished the possibility of granting exemptions permitting persons under 18 years of age to marry. The amendments further established rules on the recognition of marriages concluded abroad. As a general rule, marriages involving one or both parties who were under 18 at the time of the marriage are not recognised in Iceland. Exceptionally, recognition may be granted where the person concerned had reached the age of 16, the marriage is recognised in the country where it was concluded and recognition is considered to be in the person's best interests.

Forced marriage is criminalised under Article 225(2) of the General Penal Code and is punishable by up to four years' imprisonment. Furthermore, Article 227a on trafficking in human beings was amended in 2021 to expressly include forced marriage as a form of exploitation.

Safeguards against illegal adoption are provided in the Adoption Act No. 130/1999. Adoptions may be authorised only where the competent authorities determine that they are in the best interests of the child. Intercountry adoptions are subject to additional safeguards, including prior approval by Icelandic authorities and compliance with the 1993 Hague Convention on Protection of Children and Co-operation in Respect of Intercountry Adoption.

b. developing children's life skills (including media literacy and online safety skills), knowledge and participation;

In Iceland, children's life skills are developed across the national curriculum through six core pillars: literacy, health and well-being, democracy and human rights, equality, creativity and sustainability. Schools promote critical thinking, media literacy, safe and responsible online behaviour and active participation, including opportunities for children to express their views and influence school life. These aims are integrated into teaching and school culture rather than taught solely as separate subjects.

The 2024 revision of Iceland's National Curriculum Guide for Compulsory Schools strengthened digital citizenship by establishing a distinct competence area covering responsible internet use, privacy, digital identity and footprints, online communication, misinformation, digital well-being and artificial intelligence. Digital citizenship is integrated across subjects and supported by The Directorate of Education and School Services resources such as Vitundin – a digital citizenship education programme introduced in 2025 for pupils in grades 1-10, designed to develop the knowledge, skills, values and attitudes needed to participate safely, responsibly and positively in the digital world. Adapted to the Icelandic school system, it covers six core areas, including digital well-being, privacy and security, online identity, communication, cyberbullying and media literacy. This work is also supported by

Netvís,[4] Iceland's Safer Internet Centre under the Icelandic Media Commission. Netvís provides education, awareness-raising, research and guidance on media literacy and online safety, particularly for children and young people.

c. putting in place a system for monitoring and reporting cases of abuse;

Iceland has a system for detecting, reporting and following up concerns about violence, abuse, neglect and exploitation of children, including possible THB. The system combines monitoring of children's wellbeing in their everyday environment, mandatory reporting to child protection services and coordinated follow-up by the relevant authorities.

The Act on the Integration of Services in the Interest of Children's Prosperity, No. 86/2021, (the Prosperity act) brings services closer to children and supports coordinated early intervention. Service providers, including schools, healthcare and social services, the police and child protection services, are required to monitor children's wellbeing, identify indications that their needs are not being met and respond accordingly.

Children and parents have access, when needed, to a designated contact person in the child's immediate environment: healthcare services in early childhood, preschools, compulsory and upper-secondary schools, or municipal social services. The contact person provides information and guidance, facilitates an initial assessment of the child's needs and coordinates early support. Where more specialised support is required, a case manager and multidisciplinary support team may be appointed. This framework does not replace mandatory reporting under the Child Protection Act; relevant concerns must be reported directly to child protection services.

The Child Protection Act, No. 80/2002 establishes mandatory reporting obligations. Anyone who has reason to believe that a child is living in unacceptable conditions, is subjected to violence, abuse or other degrading treatment, or is seriously endangering their own health or development must notify child protection services. Professionals working with children have a particular duty to monitor and report concerns, which takes precedence over professional confidentiality. The police must also notify child protection services when such circumstances arise or a criminal offence against a child is suspected.

Reports may be submitted to the child protection service where the child lives or is located, or through the national emergency number 112, including its online chat. Children may also report or seek assistance themselves. Child protection services must decide without delay, -within seven days, whether to open a formal investigation. Where serious physical, psychological or sexual violence is suspected, they must seek the assistance of Barnahús, Iceland's Children's House.

Organised sports and youth activities also form part of Iceland's protective environment. Under the Prosperity Act, they are recognised as general services contributing to children's wellbeing. The Sports Act, No. 64/1998 also requires persons working within organised sport activities to monitor children's wellbeing, identify signs that their needs are not being met and respond appropriately.

The Act on the Communications Counsellor for Sports and Youth Activities, No. 45/2019 provides an independent channel for assistance in cases involving psychological, physical or sexual violence, harassment, bullying or similar misconduct. Statutory reporting obligations override the counsellor's confidentiality where applicable. The safeguarding policy of the National Olympic and Sports

[4] Netvís - Netöryggismiðstöð Íslands (unfortunately only in Icelandic).

Association of Iceland also emphasises prevention, training, safe recruitment, codes of conduct, safeguarding contacts and clear referral procedures.

Together, these measures create a multilayered system across schools, healthcare, social services, child protection, the police, sports and youth activities, supporting early identification, reporting and follow-up of children vulnerable to THB.

d. providing training to child care professionals, legal guardians, education professionals;

Iceland seeks to strengthen the capacity of professionals working with children to identify vulnerability and possible signs of exploitation or trafficking, and to respond in a coordinated and child-sensitive manner.

The National Agency for Children and Families provides guidance and support to professionals working in child protection and integrated services. This is complemented by cooperation between child protection services, the police, immigration authorities, schools, healthcare services and other actors who may come into contact with children at risk.

Particular attention is paid to unaccompanied and separated children, who may be especially vulnerable to trafficking and exploitation. In 2026, inter-agency procedures were introduced for unaccompanied children applying for international protection. Developed jointly by the Directorate of Immigration, the Directorate of Labour, the National Agency for Children and Families, the Ministry of Education and Children, the police and relevant child protection services, the procedures explicitly recognise that unaccompanied children may be victims of trafficking or other forms of exploitation. Where trafficking is suspected, professionals are instructed to refer the case to the police and notify the relevant child protection service. The procedures provide a common framework for the reception, protection and follow-up of unaccompanied children, including the best interests of the child as a primary consideration, access to interpretation and child-friendly information. Each authority involved is expected to have clear procedures for safeguarding the child's best interests.

Unaccompanied children applying for international protection are appointed a legal representative as soon as possible, while child protection authorities are responsible for their care and protection, including housing, education and general care. This framework supports early identification of vulnerabilities and protection of the child's rights and interests.

Education professionals are an important part of the protective environment. Under Icelandic child protection legislation, teachers, school administrators and other professionals working with children must report concerns about a child's safety or wellbeing to child protection services. Act No. 86/2021 on the Integration of Services for the Prosperity and Well-being of Children further strengthens cooperation between education, healthcare, social services and child protection, including through designated contact persons in schools.

Iceland is also strengthening trafficking-specific training and capacity building. In 2026, the Government concluded a four-year agreement with Bjarkarhlíð, a service centre for victims of violence and a coordination centre for victims of trafficking. Under the agreement, Bjarkarhlíð will develop training materials on THB and provide annual training for professionals working with victims, with the aim of improving identification and coordinated responses.

Together, these measures aim to equip child protection professionals, legal representatives, education professionals and other frontline staff to identify children at risk of trafficking and refer them promptly to appropriate protection and support services.

e. access to education and health care for vulnerable children, including from minority groups, unaccompanied migrant children, and children of migrant workers;

Under the Compulsory School Act No. 91/2008, compulsory education applies to all children aged 6-16 in Iceland. Schools must provide education suited to pupils' needs and ensure equal opportunities. Pupils whose first language is not Icelandic are entitled to instruction in Icelandic as a second language to support their participation in education and society. Parents who do not speak Icelandic must also be informed of their right to interpretation services.

Children who have completed compulsory education, obtained equivalent basic education or reached the age of 16 have the right to begin upper-secondary education and, where eligible, to continue it until the age of 18. Students whose first language is not Icelandic are also entitled to instruction in Icelandic as a second language at this level.

Children applying for international protection are specifically protected under the Foreign Nationals Act No. 80/2016 and must be given the opportunity to attend compulsory school, or equivalent education, as soon as possible.

The Prosperity Act No. 86/2021 further strengthens this framework. It applies to every person under 18 within Icelandic jurisdiction and aims to ensure access to appropriate, coordinated services. Where needed, children have access to a designated contact person; for children attending preschool, compulsory school or upper-secondary school, that person is based in the school. This is particularly relevant for children who face barriers related to language, migration status, social circumstances or other vulnerabilities, as it provides a clear point of contact for early identification and coordination of education, health, social or child protection services.

Children of foreign origin residing in Iceland have access to the healthcare system on the same basis as other children. Pursuant to Article 1(2) of the Patients' Rights Act No. 74/1997, discrimination against patients is prohibited on grounds including national or ethnic origin.

Access to publicly funded healthcare depends primarily on residence and health-insurance status rather than nationality or origin. Persons moving their legal domicile to Iceland receive Icelandic health insurance coverage after three months. Coverage may take effect earlier when rights are transferred from another EEA country, the United Kingdom or Switzerland.

Children not yet covered by the general health-insurance system may be subject to specific arrangements. Children applying for international protection are entitled to necessary healthcare while their application is processed, including an initial health examination and necessary medical and psychological care.

Once insured, children have access to primary and preventive care, hospital services and other necessary healthcare under the same rules as other insured children. Ordinary primary-care visits, preventive child health services and school health services are provided without consultation fees for children.

f. birth registration for all children born in the country.

All children born in Iceland are subject to birth registration. Pursuant to Art. 7 of the Children Act No. 76/2003, a child must be registered immediately after birth. The preparatory works to the Act emphasise that this provision reflects the child's fundamental right to official recognition of their existence by the State.

Birth registration is carried out through the national population registration system maintained by Registers Iceland. Notifications of birth are submitted directly to Registers Iceland by healthcare institutions or independently practising midwives. Information recorded includes the child's date and place of birth, as well as parental and custody information.

Prior to registration, the child's parentage must be established in accordance with the provisions of the Children Act concerning maternity, paternity and legal parenthood. Registration therefore requires documentation confirming the birth and the identity of the parent(s). This ensures the accuracy and reliability of information entered into the National Registry.

Children born in Iceland who acquire Icelandic citizenship are registered in the National Registry. Where a child is born to foreign national parents, registration in the National Registry depends on the registration status of the mother. If the mother is registered in the National Registry, the child is also registered. In other cases, the child is assigned a system identification number, ensuring that the child's birth is recorded even if the child is not entered into the National Registry.

3. What measures are taken in your country to address vulnerabilities related to the gender dimension of human trafficking?

Reference is made to the response to Question 2 regarding the manner in which the gender dimension of trafficking in human beings is addressed in the National Action Plan.

In this regard, it may be noted that the measure aimed at enhancing continuity in data collection on THB includes the publication of gender-disaggregated data on THB and the purchase of sexual services by the relevant responsible actors, namely Bjarkarhlíð, the National Agency for Children and Families, and the Office of the National Commissioner of Police. This contributes to a better understanding of gender-specific trends and vulnerabilities related to trafficking.

Furthermore, the measure concerning the basic training of all frontline professionals, irrespective of their field of expertise, includes training on trauma-informed and gender-sensitive approaches, enabling professionals to better recognise and respond to the differing experiences and needs of adult and children of different genders affected by trafficking and exploitation.

Although other forms of exploitation have increasingly come to light, the Icelandic authorities remain firmly committed to combating sexual exploitation, which disproportionately affects women, girls and LGBTQIA+ persons, with a particular emphasis on reducing demand. Prostitution in Iceland is considered to be largely driven by organised crime, and there are concerns that a large proportion of women advertised for prostitution may be victims of trafficking. To counter this, the Ministry of Justice has presented, for public consultation, a bill proposing amendments to the provisions of the General Penal Code concerning the purchase of sexual services. The bill will be submitted to parliament in the autumn of 2026. The bill proposes to abolish fines as a form of penalty for the purchase of sexual services, so that offences could no longer be concluded through a fine imposed by the police; instead, they would lead to the issuance of an indictment and criminal court proceedings. Additionally, the bill proposes raising the maximum sentence when the offence involves the purchase of sexual services

from a child from two years to four. The objectives of the proposal are to reduce the demand for prostitution, including child prostitution, to combat trafficking in human beings for sexual exploitation, and to strengthen efforts to combat organized crime and sexual offences.

In addition, Iceland's broader policies promoting gender equality and combating gender-based violence contribute to reducing vulnerabilities that may increase the risk of trafficking and exploitation.

4. What specific measures are taken to reduce the vulnerability to trafficking of persons from disadvantaged minorities? Please provide information on policies and measures in the following areas:

a. research;

The Icelandic authorities support research and development initiatives aimed at strengthening the human rights protection and social inclusion of disadvantaged and marginalised groups through various measures. For example, the Gender Equality Fund provides funding on a biennial basis for research and projects promoting gender equality, while the Development Fund for Immigrant Issues supports research and development projects aimed at facilitating the inclusion of immigrants in Icelandic society. These initiatives contribute to a better understanding of factors that may increase vulnerability to discrimination, social exclusion and exploitation, while supporting measures to enhance access to rights, services and opportunities.

b. information, awareness-raising and education campaigns;

The implementation of information, awareness-raising and educational campaigns promoting the social inclusion of disadvantaged and marginalised groups is a constant project. For example, projects supported by the Gender Equality Fund and the Development Fund for Immigrant Issues have included awareness-raising activities aimed at strengthening knowledge of rights and available support services among persons of foreign origin, particularly women. These initiatives also seek to foster cooperation among service providers and improve access to information for groups that may face social or economic disadvantages.

Public authorities, municipalities and civil society organisations regularly provide information to immigrants and other vulnerable groups on matters including labour rights, access to public services, gender equality, discrimination and violence. Such initiatives are often accompanied by translated materials, interpretation services and targeted outreach activities.

Reference is also made to the responses to Questions 7(a) and 21.

c. socio-economic initiatives targeting underlying and structural causes;

Although not specifically designed as anti-trafficking measures, the Icelandic government has continually sought to strengthen the protection of human rights and promote social inclusion across society, including for groups that may be at increased risk of exploitation. Particular emphasis has been placed on combating discrimination and promoting gender equality, and ensuring support for children and other persons in vulnerable situations. Measures aimed at reducing vulnerability include access to healthcare and social services, financial support for low-income families, and initiatives to promote equal opportunities and participation in society.

d. education, vocational training and job placement programmes.

Based on the Implementation Plan for Immigrant Issues for the years 2022–2025, the government has worked to strengthen the position of immigrants in the labour market, reduce unemployment, and promote equal opportunities. The Directorate of Labour has, inter alia, worked to reduce long-term unemployment among foreign citizens through Icelandic language proficiency assessments, increased job-search support and increasing the number of courses for foreign job seekers. A new and updated information site for immigrants was launched, providing access to information regarding protection of working conditions and social rights in numerous languages. One action aimed to make it easier for refugees to take their first steps in the labour market. Its implementation included support for companies that hired refugees, an increase in the number of refugee employment advisers at the Directorate of Labour, and the development of specialised Icelandic language courses along with workplace training for jobs in preschools and elder care facilities.

The Implementation Plan on Immigrant Issues for 2026–2029, submitted to Parliament in September 2026, addresses these same issues. The Plan places particular emphasis on access to Icelandic language courses as a means of improving immigrants' opportunities in the labour market and promoting social inclusion. It also focuses on improving the recognition of qualifications and professional experience acquired abroad.

The Gender Equality Action Plan for the years 2026–2029 contains a measure aimed at addressing the drop-out rate among boys and students whose native language is not Icelandic. The causes of withdrawal from school at the upper-secondary level will be examined, especially among boys and students with a native language other than Icelandic. Concurrently, research findings and other knowledge regarding the causes of drop-outs will be used in policy-making, including the development of more targeted measures to combat school drop-out rates.

5. What specific measures are taken to reduce the vulnerability to THB of persons with disabilities? Please provide information in the following areas:

a. deinstitutionalisation, including community and family-based services for children and support for independent living;

The Act No. 38/2018 on Services for Persons with Disabilities with Long-Term Support Needs emphasises the importance of ensuring that children with disabilities enjoy all human rights and respect for their inherent dignity on an equal basis with other children, and are given the opportunity to live independently, and have effective access to education, training, preparation for employment and recreational activities. The Act reaffirms the fundamental principle that, in all actions and decisions concerning children with disabilities, the best interests of the child concerned shall always be a primary consideration, to promote the child's social inclusion and development. The Act also establishes the fundamental right of a child with disabilities to grow up within their family and to enjoy family life, in accordance with Art. 23 of the United Nations Convention on the Rights of Persons with Disabilities. Municipalities are under a strong obligation to provide comprehensive, effective, and adequate services in the child's home and immediate community. Such support should be aimed at enabling the child to attend their local school and to participate in ordinary recreational and leisure activities with their peers. Providing services in the child's home reduces the burden on families and helps prevent the child's social isolation or segregation. Services provided outside the child's home, or in specialised residential settings exclusively for children with disabilities, should never be the service provider's first option. Such services should be available only where it has been demonstrated

that all reasonable efforts to provide adequate services and support in the child's home and immediate community have been exhausted, or where such arrangements are clearly in the child's best interests.

These measures may also reduce the risk of children with disabilities being exposed to violence, abuse, exploitation, and trafficking in persons. Ensuring that children receive support within their families and local communities, participate in general education and recreational activities, and maintain social relationships can reduce the risk of social isolation, segregation and power imbalances that may arise in relation to individual caregivers or within closed institutional settings.

b. monitoring institutions and foster families accommodating persons with disabilities;

The Quality and Supervisory Authority of Welfare is responsible for external oversight of the quality of services provided, including services provided under the Act on Services for Persons with Disabilities with Long-Term Support Needs and the Child Protection Act. Service providers are required to maintain internal oversight mechanisms and to respond to unexpected incidents arising in the provision of services. Incidents of this nature may indicate inappropriate practices and must be investigated by a body that, in each case, meets the applicable requirements of independence and impartiality.

Such oversight can help reduce the risk of persons with disabilities being exposed to trafficking in persons and other forms of exploitation. Regular and independent monitoring of the circumstances of persons with disabilities who live or stay in institutions, in foster care or in other care or service settings can help identify and address situations involving abuse, violence, neglect or exploitation. This is particularly important where individuals depend on others for daily services or support and may face greater barriers to reporting violations of their rights.

Rights protection for persons with disabilities, which falls under the Human Rights Institution of Iceland, is responsible for monitoring the rights of persons with disabilities. It shall provide persons with disabilities with guidance and, where necessary, appropriate support to enable them to exercise and enjoy their rights. Where it considers the nature of a matter to warrant such action, the rights protection service may bring concerns to the attention of the relevant parties. The Human Rights Institution of Iceland is also responsible for monitoring the implementation of the United Nations Convention on the Rights of Persons with Disabilities, in accordance with Art. 33(2) of the Convention. Access to rights protection and support in exercising their rights can also strengthen the ability of persons with disabilities to raise complaints or report concerns about circumstances that may involve exploitation or trafficking in persons. See further under point (e) below.

c. procedure for the selection and appointment of legal guardians and monitoring of their work;

District Commissioners, in their capacity as superior guardians, are responsible for the selection and formal appointment of guardians under the Legal Competence Act No. 71/1997. Pursuant to Art. 81 of the Act, District Commissioners have a statutory duty to supervise the activities of appointed guardians.

Persons with disabilities who, due to their disability, have difficulty safeguarding their own interests without assistance are entitled to have a personal spokesperson appointed to assist them. The District Commissioner confirms the choice made by the person with disabilities and the terms of the formal

agreement between the parties, at which point the agreement enters into force. The District Commissioner shall supervise the implementation of the agreement.

Personal spokespersons are primarily intended to serve as assistants who are familiar with the person concerned, their interests and needs. A personal spokesperson is neither the legal guardian nor the financial administrator of the person with disabilities and is not authorized to make decisions without consulting the person concerned or to act on their behalf without their involvement.

d. access to adequate accommodation, education and work;

Municipalities are responsible for providing advice on financial and housing matters, considering the circumstances of the person with disabilities concerned.

Under Icelandic law, persons with disabilities are entitled to education with appropriate support at all levels of the education system. Children with disabilities are entitled to attend preschool and receive compulsory education in the municipality in which they have their legal domicile. Education is to be provided with appropriate support services. In the capital region, a special school is operated for students with disabilities of compulsory school age. By law, students with disabilities at the upper secondary level must have access to specialist support. Many upper secondary schools offer special education departments, vocational programmes and other educational programmes specifically designed for students with disabilities.

Participation in education can promote social inclusion, greater independence, and improved opportunities for further education and participation in the labour market. The school environment can also provide children and young people with disabilities with opportunities to establish relationships with teachers, specialists, and others outside their immediate care environment. Such relationships can increase the likelihood that signs of violence, abuse, or exploitation are identified and addressed.

The Directorate of Labour provides persons with disabilities and persons with reduced work capacity with individualised advice and support aimed at increasing their opportunities to participate in the open labour market. This includes, in particular, Supported Employment, which provides assistance with job searches, recruitment processes and adjustment to a new job, as well as employment agreements for persons with disabilities, which provide financial support to employers who hire persons with reduced work capacity.

Access to secure employment in the open labour market, with the rights and working conditions applicable to such employment, can contribute to greater financial independence and social inclusion for persons with disabilities, thereby reducing circumstances that may increase their vulnerability to abuse, exploitation and trafficking in persons.

e. access to information and reporting/complaints mechanisms which are accessible to persons with disabilities.

For a person with disabilities, the most accessible course of action would generally be to contact the rights protection service of the Human Rights Institution of Iceland for information and guidance on how to report violence, THB or exploitation. In addition, all relevant parties are under a statutory obligation to report to the rights protection service of the Human Rights Institution of Iceland where they have reason to believe that the human rights of a person with disabilities who has difficulty

safeguarding their own rights due to their disability are being violated. The rights protection service of the Human Rights Institution of Iceland may also initiate a case at any time on its own initiative, including based on media reports concerning THB.

Throughout all proceedings before the Human Rights Institution of Iceland, emphasis is placed on ensuring that information is provided to persons with disabilities in a manner that takes account of their disability and age, enabling them to participate effectively in proceedings on an equal basis with others. This includes ensuring accessibility, providing information in an accessible and understandable format, taking account of different means of communication, and, where appropriate, providing appropriate support. These matters are addressed in Art. 13 of the United Nations Convention on the Rights of Persons with Disabilities, which was incorporated into Icelandic law by Act No. 80/2025.

6. How do you ensure in practice that an assessment of the vulnerability and special needs of asylum seekers is carried out at an early stage? What procedures are followed when vulnerability to THB is detected? Please provide information on policies and measures in the following areas:

a. provision of comprehensive and accessible information, in a range of relevant languages, on the rights of asylum seekers, indicators of THB, rights of victims of THB, and contacts of relevant organisations;

Applicants who are identified as potential victims of THB are provided, at the conclusion of their interview, with an information leaflet outlining the assistance, support services and protection measures available to them. The leaflet also includes relevant contact information for organisations and service providers offering assistance to victims of THB.

b. access to legal assistance and representation;

All applicants for international protection are provided with legal assistance through the appointment of a legally qualified representative. Each applicant is assigned a legal representative who provides legal assistance and representation throughout the international protection procedure.

Furthermore, interviews are conducted in a language that the applicant understands, with the assistance of certified interpretation services or interpreters who are physically present during the interview. This ensures that applicants are able to communicate effectively, understand the questions posed to them and provide relevant information concerning their individual circumstances, including any potential indicators of trafficking in human beings.

c. access to decent accommodation, health (including psychological) care, work and education.

All applicants for international protection, including potential victims of THB, are provided with relevant information regarding the accommodation, healthcare services (including psychological care), employment opportunities and educational opportunities available to them, as well as information on how to access these services and support measures.

Upon completion of screening with border control, an individual shall be referred to the appropriate services, which will typically be either a deportation facility or asylum processing. In cases involving

children, referrals may be made to child protection services. The Asylum Seekers Service Team of the Directorate of Labour will make special arrangements for situations involving vulnerable individuals and/or if staff suspect that an asylum seeker is a victim of THB. That includes housing arrangements.

The Welfare Team of the Directorate of Labour conducts health screenings for all applicants. A specialist within the team also carries out specific SNVA screenings to identify individuals and groups who may be in vulnerable situations or require additional support. The team includes, among others, a social worker and nurses, and same day appointments are available when necessary. Following the screening, individuals are referred to the appropriate services and support measures based on their needs. Consideration is given to people in vulnerable situations, with appropriate measures taken to help ensure their safety, well-being, and access to necessary support. If staff suspect that an asylum seeker is a victim of THB, the appropriate authorities should be notified depending on the type of trafficking involved.

The Department of Employment Services and Refugee Integration with The Directorate of Labour can and will provide victims or potential victims of THB, with special assistance and support in their job search if they request such assistance.

7. What specific measures are taken to reduce the vulnerability to THB of migrant workers (including seasonal workers, seconded/posted workers, domestic workers, diplomatic household employees)? Please provide information on policies and measures in the following areas:

Measures aimed at preventing labour exploitation and trafficking are implemented through labour and immigration legislation, workplace supervision, cooperation between public authorities and social partners, access to trade unions and specific protection measures for possible victims of trafficking.

a. provision of comprehensive and accessible information, in a range of relevant languages, on migration and labour laws, worker protection and contacts of relevant organisations;

Reference is made to the response to Question 21.

Information on employment rights, residence and work permits, social rights and public services is provided through several public authorities and organisations. The official Ísland.is portal provides information in Icelandic and English on residence and work permits and on the rights of posted workers. The Directorate of Labour provides information and counselling to immigrants and refugees and specifically seeks to provide information in languages that users can reasonably be expected to understand.

The Directorate of Equality also publishes the booklet *Your Rights* for immigrants in Iceland. It is currently available in English, Polish, Spanish, Thai, Russian, Arabic, French and Ukrainian, as well as Icelandic. It includes information on THB, violence, complaints, legal assistance, residence permits and contact details for relevant authorities and support organisations.

Trade unions play an important role in providing foreign workers with information about wages, working hours, holiday rights and other employment conditions. The Icelandic Confederation of Labour (ASÍ), for example, publishes information specifically aimed at foreign workers, including a checklist advising workers to obtain written employment contracts, retain payslips and keep their own

records of working hours. They also host the website labour.is, containing information about rights at work.

Specific information is available for posted workers. The Administration of Occupational Safety and Health provides a dedicated information service on the rights of posted workers, including wages, working time, accommodation and applicable Icelandic legislation and collective agreements.

Information concerning THB is also available through the Directorate of Labour. Possible victims are directed inter alia to the Directorate of Immigration, the police, the emergency number 112 and Bjarkarhlíð, the centre for victims of violence.

b. provision of clear employment contracts;

Icelandic rules require employment conditions to be set out in writing in a broad range of employment relationships. As a general rule, where employment lasts for more than one month and averages more than eight hours per week, the worker must receive a written employment contract or written confirmation of the employment terms. The information includes, among other things, the identity of the parties, workplace, job description, remuneration, working hours, holiday entitlement, notice periods, pension fund and the applicable collective agreement.

For third-country nationals applying for a temporary work permit, an employment contract forms an essential part of the permit procedure. The contract must specify the employment and must provide wages and other conditions compatible with Icelandic legislation and applicable collective agreements. There are also additional safeguards that apply for posted workers where the foreign service provider must submit a copy of the employment contract to the Administration of Occupational Safety and Health.

c. access to decent work and housing, health care, social services and education;

All workers, including foreign workers, are covered by statutory minimum employment conditions and the minimum standards established by applicable collective agreements. Agreements providing less favourable terms than the applicable collective agreement are invalid. Occupational safety and health legislation also applies irrespective of nationality.

Access to health care depends partly on residence and social-security status. Following recent legislative changes, persons moving to Iceland from outside the EEA are generally covered by Icelandic health insurance after three months of registered legal domicile, rather than the previous six-month waiting period. Persons moving from another EEA country, Switzerland or the United Kingdom may in certain circumstances transfer existing health-insurance rights and obtain coverage earlier. During an applicable waiting period, residence-permit applicants are generally required to have private health insurance.

In the health screening for immigrants a pilot project under the Primary Health Care of the capital area was established in 2025 with a 50% equivalent position, aimed at strengthening follow-up support for individuals in vulnerable situations, including victims of THB following their examination. The project also focuses on providing training for healthcare professionals and examining procedures for recording THB cases within the healthcare system. In June 2026, the staffing level to the project was increased. Expansion was intended, among other things, to place greater emphasis on training

healthcare professionals to recognise indicators of THB and to provide guidance on appropriate responses and available support services.

Access to municipal social services and other residence-based benefits depends on the individual's residence status and legal domicile. Reference is made to the response to Question 2(e) regarding education.

d. possibility to change employers;

EEA nationals have free access to the Icelandic labour market and may generally change employers without obtaining a work permit.

For third-country nationals holding a temporary work permit, the permit is normally linked to a particular employer. However, this does not prevent the worker from changing employer. The worker may apply for a new work permit in respect of the new employer, although the new permit must generally be granted before work for the new employer begins.

The Act on Foreign Nationals seeks to prevent a worker from becoming irregular or remaining with an abusive employer solely because the worker's residence status is employment-related. Under Art. 61, a specialist worker whose employment ends may be granted up to one year to seek another specialist position. Under Art. 62, a worker admitted because of a labour shortage may be granted up to six months to seek new employment.

e. access to confidential complaints mechanisms;

Foreign workers can seek assistance independently from several bodies. Workers may approach their trade union or a workplace shop steward regarding unpaid wages or other breaches of employment conditions. Under Icelandic labour-law arrangements, trade unions can investigate complaints concerning wages and seek rectification from the employer.

Workers can also contact the Administration of Occupational Safety and Health concerning occupational health and safety matters and the authorities responsible for monitoring foreign service providers and posted workers.

Possible victims of trafficking may contact the police, 112, Bjarkarhlíð or the Directorate of Immigration. Importantly, an application for a residence permit as a possible victim of trafficking can be made orally or in writing and does not depend on the person having first lodged a criminal complaint or agreed to cooperate with a police investigation.

f. right to join trade unions and to engage in collective bargaining;

Migrant workers have the same right as Icelandic workers to join a trade union. For EEA workers, equal treatment regarding trade-union membership and the exercise of related rights is expressly protected under the EEA rules on free movement of workers.

The Icelandic labour-market model is strongly based on collective bargaining. Collective agreements establish legally enforceable minimum conditions for all workers performing work covered by the

agreement, irrespective of whether the individual worker is a union member. Employment terms below the applicable collective-agreement minimum are therefore unlawful.

Trade unions also have an important monitoring role regarding migrant workers. Union representatives may examine wage and employment information where there is reason to suspect violations and can assist workers in pursuing unpaid wages and other claims.

g. legal avenues for regularising their stay in the country.

Iceland does not operate a general regularisation scheme under which unlawful employment or a period of irregular stay gives rise to a right of residence. As a general rule, a first residence permit must be obtained before entry into Iceland.

Nevertheless, migrant workers who are lawfully present may renew their residence permits where the relevant conditions continue to be met and, in certain circumstances, apply for a residence permit on a different basis. Holders of work-related residence permits may also change employers subject to the applicable residence and work permit requirements. In addition, holders of residence permits for work requiring expert knowledge may be granted up to one year to seek new employment following the termination of their employment, while holders of permits issued on the basis of labour shortages may be granted up to six months.

Where exploitation or trafficking is involved, specific protective residence permits are available. Presumed victims of THB may be granted a recovery and reflection period residence permit under Article 75 of the Act on Foreign Nationals, and victims of THB may be granted a renewable residence permit under Article 76 where justified by their personal circumstances or their cooperation with the authorities.

Depending on the circumstances of the individual case, other residence grounds may also be available, including residence permits based on strong ties to Iceland, international protection or humanitarian considerations.

A draft bill which will be submitted to parliament in autumn 2026 proposes a new temporary residence permit for migrant workers holding permits under Articles 61 or 62 who are suspected of having been subjected to exploitation or serious labour-law violations by their employer. The proposed permit could be granted for up to 12 months to enable the person to seek alternative employment and pursue their rights. The ordinary maintenance and employment-related requirements could be waived. The proposal would complement, rather than replace, the existing residence permit provisions available to victims of THB.

8. Do labour inspectorates and other authorities checking workplace conditions possess a comprehensive mandate, and adequate human, financial and technical resources, to conduct regular, proactive workplace inspections in all economic sectors, with a particular emphasis on high-risk sectors prone to exploitation? How do labour inspectors co-operate with other authorities and trade unions? Is there a separation between labour inspection and immigration control functions?

Responsibility for monitoring workplace conditions is divided between the Administration of Occupational Safety and Health (AOSH), trade unions and, in relevant cases, other public authorities. Trade unions generally monitor compliance with collective agreements, including employment contracts and wages. AOSH monitors working time, rest periods, occupational safety and health, and

certain accommodation facilities, in particular collective workers' accommodation. In the case of posted workers and temporary agency workers, AOSH also monitors employment contracts, wages and other working conditions. It is furthermore responsible for the registration and supervision of foreign service providers, posted workers and temporary-work agencies.

AOSH may carry out workplace inspections on its own initiative, based on risk analysis, as well as in response to complaints and information received from workers, trade unions, public authorities and other sources. Approximately 21 full-time equivalent posts are involved in field inspections. AOSH conducts around 1,700 workplace inspections annually across its statutory field of competence. Inspectors may enter workplaces, request relevant information and conduct interviews with workers without the employer being present. Interpretation is available where necessary, including through LanguageLine. Machine translation may also be used to facilitate initial communication, where appropriate.

Cooperation between AOSH and other authorities was strengthened through Act No. 105/2024, which entered into force on 1 January 2025. The Act established a statutory inter-agency co-operation platform against labour-market crime under the leadership of AOSH. The platform brings together AOSH, the police and tax authorities. Its statutory tasks include joint inspections and follow-up, analytical work and information exchange within the limits permitted by law. The Act also requires formal and regular consultation and co-operation with organisations representing workers and employers. The same legislation transferred responsibility for supervising posted workers, foreign service providers and temporary-work agencies from the Directorate of Labour to AOSH, to make public labour market supervision more efficient, by consolidating all oversight under a single institution.

Written procedures and a checklist on trafficking indicators and referral are available and are used primarily for training purposes. Where inspectors encounter indicators of trafficking or particularly serious exploitation, AOSH ensures referral to Bjarkarhlíð and/or the police. One workplace inspection in 2025 led to subsequent police searches later that day.

Labour inspection and immigration control remain legally distinct functions, but there is increasing operational integration in workplace enforcement. Under Act No. 79/2026, amending the Aliens Act and the Act on Foreign Nationals' Right to Work, AOSH has been given a role in monitoring compliance with the Act on Foreign Nationals' Right to Work, alongside the police and the Directorate of Immigration. AOSH does not issue, revoke or otherwise decide on residence or work permits; those administrative functions are exercised by the Directorate of Immigration.

During joint operations, the respective roles of the participating authorities are defined in advance. Information obtained by AOSH is not automatically transmitted for immigration-enforcement purposes; disclosure is assessed in light of the circumstances and the applicable legal framework. AOSH does not formally identify victims of trafficking, but where serious conditions or trafficking indicators are observed, the matter may be referred to the specialised police team and the person concerned to appropriate assistance. More detailed procedures governing the interaction between labour inspection, permit-related monitoring and victim referral are currently being developed.

9. How are employment and recruitment agencies regulated and monitored? Are all stages of the recruitment process, including advertisements, selection, transport, and placement, subject to regulation? Are recruitment fees and related costs prohibited from being borne by workers or jobseekers?

Temporary-work agencies operating in Iceland are specially regulated with Act No. 1359/2005 under the surveillance of the Administration of Occupational Safety and Health. For a temporary work agency to be approved, it must comply with specific conditions to register, such as provide information concerning their activities and employees, and copies of employment contracts. According to the rules on temporary work agencies, they may not demand payments from its employees in return for providing them with employment.

Private employment/recruitment agencies are addressed separately in Act No. 55/2006 on Labour Market Measures. Art. 19 permits companies, individuals and non-profit organisations to act as intermediaries in recruitment, provided that the service is carried out at the employer's expense.

10. How do you prevent and sanction abuses of legal constructions such as self-employment, letter-box companies, sub-contracting, and posting of workers, which may be used to commit THB?

Reference is made to the response to Question 8. Abuses involving subcontracting arrangements, foreign service providers, temporary-work agencies and other legal constructions that may conceal labour exploitation or THB are addressed through workplace inspections, information exchange and joint enforcement activities carried out by AOSH, the police and tax authorities under the cooperation platform against labour-market crime. Where serious violations are identified, the matter may result in administrative sanctions, labour-market enforcement measures or criminal investigation.

11. How do your country's migration legislation and policies seek to prevent THB by enabling lawful migration and legal employment opportunities accompanied by decent work conditions?

The Foreign Nationals Act No. 80/2016 provides several lawful employment-related residence-permit routes for third-country nationals. These include permits for work requiring specialist knowledge (Art. 61), work in response to a shortage of labour (Art. 62), professional athletes (Art. 63), and specialised employees engaged under service or cooperation agreements (Art. 64). Additional routes include residence permits for study, accompanied by a right to work up to 60% during studies, and an entitlement for graduates of Icelandic universities to remain for up to 18 months to seek specialist employment. Art. 66 also provides for residence under bilateral youth-mobility arrangements. EEA and EFTA nationals and other persons covered by the relevant free-movement arrangements are exempt from the work-permit requirement.

The legislation also seeks to prevent a worker from becoming irregular or remaining with an abusive employer solely because the worker's residence status is employment-related. Under Art. 61, a specialist worker whose employment ends may be granted up to one year to seek another specialist position. Under Art. 62, a worker admitted because of a labour shortage may be granted up to six months to seek new employment.

Under Articles 5 and 7 of the Foreign Nationals' Right to Work Act No. 97/2002, a work permit confers a right to work subject to Icelandic labour law. A signed employment contract must guarantee wages, and other conditions equivalent to those of workers in Iceland under applicable legislation and collective agreements. The Directorate of Immigration may obtain the opinion of the relevant trade union concerning the proposed wages and conditions. In addition, Art. 1 of Act No. 55/1980 provides that collectively agreed wages and working conditions constitute mandatory minimum terms for all workers in the relevant occupation, irrespective of nationality; less favourable individual terms are invalid.

The permit procedure is also a preventive screening mechanism. The Directorate of Immigration may refuse a temporary work permit where the proposed employer has previously breached the work-permit legislation, failed to pay wages in accordance with the applicable collective agreement, or failed to account for taxes or social-security contributions.

Articles 75 and 76 of the Foreign Nationals Act provide residence permits for suspected and identified victims of THB. A suspected victim may receive a permit for up to nine months, while an identified victim may receive a renewable permit of up to one year where this is necessary because of the person's circumstances or cooperation with the authorities. The person may not be removed from Iceland while either permit is valid.

A draft bill has been presented for public consultation that contains reforms on the residence permit section of the Act no. 80/2016 on Foreign Nationals, further reducing workers' dependence on potentially exploitative employers. The bill will be submitted to parliament in the autumn of 2026. Where there are reasonable grounds to suspect that a person holding a permit under Art. 61 or 62 has suffered exploitation or a serious labour-law violation by the employer, the person could receive a residence permit for up to 12 months in order to seek other employment and, if they choose, pursue their rights. The usual specified maintenance and employment-related conditions could be waived. Use of this mechanism would not prevent a subsequent THB assessment or the granting of a permit under Art. 75 or 76. The bill also proposes abolishing the separate residence permit category for third-country national au pairs. This proposal reflects concerns about the structural vulnerabilities associated with work performed in private households, including dependency on host families and the lack of ordinary employment protections. Domestic and care work would instead be channelled through standard employment arrangements governed by labour legislation and collective agreements.

12. How do your country's law and policies to discourage demand that leads to THB address particular vulnerabilities and groups at risk of THB?

Reference is made to the response to Question 3 regarding reducing demand for sexual exploitation by changes to the provision of the General Penal Code on the purchase of sexual services.

Prior to the introduction of the Minister of Justice's bill amending the provision on the purchase of sexual services in the General Penal Code in autumn 2026, a survey will be undertaken to assess public awareness and attitudes concerning prostitution and its links to trafficking in human beings. If the results demonstrate a need for increased public awareness of the relationship between prostitution, human trafficking and organised crime, awareness-raising measures will be implemented in 2027-2028. While centred on reducing demand for sexual exploitation, these measures are expected to increase public awareness of trafficking in human beings in general and to generate wider preventive effects in relation to other forms of exploitation.

A review is envisaged during the implementation of the 2026-2030 Action Plan against THB of whether a specific provision should be added to the General Penal Code on the use of services which are the object of exploitation, with the knowledge that the person is a victim of trafficking in human beings, or whether existing provisions cover it.

Reference is made to the final section of the response to Question 1 concerning the Government Strategy and Action Plan against Labour-Market Crime 2026–2028.

13. How do your country's legislation and practice ensure that there is an individual assessment of protection needs at the borders prior to any refusals of entry or expulsions?

Art. 19a of the Foreign Nationals Act requires screening of persons intercepted while crossing an external border irregularly who do not satisfy the entry conditions, persons applying for international protection at an external border who do not satisfy those conditions, and certain persons found to be staying unlawfully after an unscreened irregular entry. The screening includes the collection of information, a health examination, a security check and an assessment of whether the person is in a particularly vulnerable situation. Victims of THB are expressly included in the statutory definition of persons in a particularly vulnerable situation.

Every refusal of entry or expulsion is also subject to the general procedural guarantees in the Foreign Nationals Act and the Administrative Procedures Act No. 37/1993. Before an adverse decision is taken, the authority must ensure that the case is sufficiently investigated, give the person an opportunity to present their views and observe the principle of proportionality. In refusal-of-entry and expulsion proceedings, the person must be informed of their rights and the procedure in a language they can reasonably be expected to understand and, as far as possible, must be able to communicate their views in a language they understand and can express themselves in.

Art. 42 of the Foreign Nationals Act prohibits returning any person to a territory where they have reason to fear persecution or face an imminent risk of death or inhuman or degrading treatment. It also prohibits indirect or chain refoulement and expressly applies to every type of decision under the Act.

Under Art. 106 of the Foreign Nationals Act, if a person facing refusal of entry states that they are a refugee or stateless person, or otherwise provides information indicating that Art. 42 may apply, the matter must be referred to the Directorate of Immigration for examination and decision. An application for international protection may be made to either the police or the Directorate; an application received by the police must be forwarded to the Directorate.

Once international protection is at issue, the applicant is interviewed individually. The interview must be conducted so that circumstances relevant to the application are as likely as possible to emerge, with attention to the person's individual circumstances and with an interpreter unless expressly declined. The Directorate must also arrange an individual assessment, with appropriate specialist assistance, of whether the applicant is in a particularly vulnerable situation and whether special procedural or reception needs must be taken into account.

Under Art. 75, a person suspected of being a victim of THB may be granted a residence permit for up to nine months and may not be removed during that period. If the person has applied for international protection, or there is reason to believe that the international-protection provisions may apply, that question must be determined before Art. 75 is applied. An identified victim granted a renewable permit under Art. 76 likewise may not be removed while the permit is valid.

In expulsion cases, Art. 102 additionally requires an individual proportionality assessment based on the facts of the case, the seriousness of the relevant conduct and the person's ties to Iceland. Particular consideration must be given to children and their immediate family members, and the best interests of the child must be a primary consideration.

Decisions in international-protection cases generally may not be enforced until they are administratively final. However, if previously unexamined circumstances relating to refugee status,

subsidiary protection, statelessness or Art. 42 are raised when removal is to be carried out, the police must refer the matter to the Directorate of Immigration for a decision on suspending enforcement.

Regulation No. 866/2017 incorporates the Schengen Borders Code into Icelandic law. The Code requires border control to respect access to international protection, non-refoulement and fundamental rights. A refusal of entry must be based on an individual, substantiated decision stating the precise reasons and is without prejudice to the special rules concerning asylum and international protection.

14. What measures are taken to prevent THB in sports? What sectors and categories/ groups of people have been identified as being at risk?

No cases of THB in the field of sport have been identified in Iceland. The Communications Counsellor for Sports and Youth Activities provides an independent channel for reporting violence or misconduct and can refer concerns to the appropriate authorities.

15. Have you identified online practices that may increase the risk of becoming a victim of THB for different forms of exploitation? What mechanisms have been developed to prevent the misuse of information and communication technology for THB purposes? What is the practical effect of their implementation?

Reference is made to the responses to Questions 16 and 30. While no systematic assessment of online practices facilitating THB has been conducted, the Icelandic authorities recognise that digital platforms may be misused in connection with exploitation and trafficking. Preventive measures therefore include initiatives aimed at strengthening online safety, digital literacy and awareness of online risks among children and young people.

16. What measures are taken to raise awareness of the risks of technology-facilitated THB, including among children, parents, teachers, child care professionals and social workers? What technology-based initiatives exist in your country to disseminate information to groups/communities at risk of THB?

Awareness-raising concerning technology-related risks affecting children in Iceland is primarily carried out within broader frameworks addressing online safety and the prevention of digital sexual violence, rather than through initiatives specifically targeting THB. These efforts address online grooming, sexual extortion, child sexual abuse and other forms of online exploitation, which may constitute risk factors for trafficking and related forms of abuse.

In the cooperation of Netvís, Iceland's Safer Internet Centre, with the National Commissioner of Police, work is underway to establish a reporting hotline for illegal and harmful online content and to further develop procedures for handling reports concerning child sexual abuse material.

The Government's Prevention Plan against Gender-Based and Sexual Violence among Children and Young People 2026–2030 includes measures relevant to preventing online exploitation. These include the development of harmonised guidance for parents on digital sexual violence, pornography and artificial intelligence, as well as the provision of accessible online training for professionals working with children.

In 2026, the Safer Icelandic Youth 2.0 project, led by the National Commissioner of Police, integrated the prevention of online child sexual exploitation into existing school-based violence-prevention frameworks. The project addresses online grooming, sexual extortion, the non-consensual sharing of intimate images and the misuse of artificial intelligence, and includes educational resources for pupils, teachers and other professionals. Community police officers also visit schools to strengthen awareness of online risks and improve institutional responses to incidents involving violence and exploitation.

Further preventive efforts include community policing initiatives in which police officers engage with children through online gaming platforms, providing guidance on online safety and raising awareness of risks posed by criminal and extremist groups targeting vulnerable children. In addition, children identified as requiring specialised support may be referred to Barnahús through child protective services. They may also be referred, through school nurses, to Bryndísarhlíð, a new multidisciplinary violence and trauma centre for children being established within the Landspítali University Hospital, expected to open in 2027.

As part of the Safer Internet Centre project, Netvís develops educational materials for vulnerable groups, particularly children, and intends to expand such efforts to vulnerable adults. In 2026, awareness-raising activities have been delivered to several vulnerable groups, as well as professionals working with children and young people. Educational initiatives have also targeted older persons, who may likewise be vulnerable to exploitation and abuse.

Through participation in international and domestic cooperation networks, including the Safer Internet Centre network and the EMIL cooperation framework, Netvís exchanges knowledge and good practices with partner organisations, including on issues related to online exploitation. This cooperation may support future development of awareness-raising and prevention measures addressing trafficking-related risks in the online environment.

17. How do you cooperate with ICT companies and Internet service providers, including content hosts and social media, in preventing THB?

Currently, the authorities do not have any cooperation with ICT companies and Internet service providers in preventing THB.

At present, the Icelandic authorities do not have any formal cooperation arrangements with ICT companies or internet service providers aimed at the prevention of THB. However, law enforcement authorities may cooperate with online service providers in the context of criminal investigations, as described in the response to Question 38.

18. How are policies and practices aimed at preventing THB informed by the experiences of victims and at-risk individuals?

In preparing the National Action Plan against Trafficking in Human Beings, efforts were made to ensure that it was grounded in evidence-based knowledge and informed by as wide a range of perspectives as possible. However, given Iceland's small population, the relatively low number of identified victims, and the limited availability of documented victim accounts, direct evidence from survivors in the Icelandic context remains relatively limited.

For this reason, particular reference was made to the 2022 NRM handbook of the OSCE Office for Democratic Institutions and Human Rights (ODIHR), given that it was developed in close cooperation with survivors of trafficking and incorporates survivor-informed approaches throughout.

In addition, comments were invited through the Government's consultation portal. While the only Icelandic NGO specifically dedicated to combating trafficking in human beings, Stop the Traffik Iceland, has been largely inactive in recent years, it has recently resumed its activities and submitted comments on the draft National Action Plan. These comments will be carefully considered before the Action Plan is finalised and published in November.

More broadly, policies and practices relating to trafficking in human beings are informed by biannual consultation with service providers and organisations that work directly with victims, helping to ensure that prevention measures are responsive to identified risks and lived experiences.

II. IDENTIFICATION OF VICTIMS AND PROTECTION OF THEIR RIGHTS (Articles 10, 11, 12, 14 and 16)

19. Among the victims of THB identified, were any subjected to exploitation on the basis of their sexual orientation and/or gender identity (LGBTI+: lesbian, gay, bisexual, transgender or intersex), especially teenagers and young adults? If yes, did any of them report on police misconduct?

Cases of trafficking in human beings reported to the police are recorded by gender, i.e. male, female, or non-binary. However, information concerning victims' sexual orientation and gender identity is not collected, and no data exists on whether victims have been subjected to exploitation on the basis of their sexual orientation or gender identity. Since the Police Monitoring Committee commenced its operations in 2017, no allegations or reports of police misconduct concerning LGBTI+ victims of THB have been recorded.

Under the LGBTI+ Action Programme for the period of 2026–2029 education on LGBTI+ issues for police officers and staff of the National Commissioner of the Icelandic Police is to be widened in cooperation with the National Queer Organisation of Iceland. This education should also be incorporated into the continuing education of police officers through the Centre for Police Training and Professional Development and adapted to specific operational units, such as the Communications Centre and crime prevention. The objective of the action is to increase police officers' knowledge of LGBTI+ issues, promote rights-based services, and strengthen the LGBTI+ community's trust in the police. Implementation has already begun through digital training, which will be followed up in-person later this year in cooperation with the National Queer Organisation of Iceland.

20. What specific measures are taken to ensure that trafficked persons who are migrant workers, including in an irregular situation, are identified as victims of THB and have access to the rights provided for in the Convention? Is there cooperation with specialised NGOs, trade unions, and employers to enhance the identification and protection of potential victims within these at-risk groups?

Reference is made to the final section of the response to Question 1 concerning the Government Strategy and Action Plan against Labour-Market Crime 2026–2028. Potential victims may be identified through workplace inspections, trade unions, labour-market authorities, police investigations, immigration procedures and victim-support services. Cooperation between AOSH, the police, tax authorities, trade unions and support organisations forms an important part of efforts to identify and protect migrant workers who may be victims of THB.

21. What measures are in place to encourage victims of THB to report their situation to the authorities and/or civil society organisations?

An information leaflet on trafficking in human beings is available at major service access points throughout Iceland in Icelandic, English and Polish. The leaflet includes a QR code directing users to the website of the national emergency hotline, where further information on THB and related support services is provided in 15 languages.

As part of the implementation of the National Action Plan, efforts will be made to increase the visibility and accessibility of this information by ensuring that the website is linked from other websites that potential victims of trafficking may be likely to access. These include *Landneminn*, a website with teaching material in community education for adult immigrants in Iceland; *Labour.is*, the rights information website of the Icelandic Confederation of Labour (ASÍ); and *Posting.is*, the Administration of Occupational Safety and Health's information portal for temporary work agencies and posted workers.

Efforts have been made to introduce the role of Bjarkarhlíð to all frontline professionals and will be increased with the implementation of the new National Action Plan and the National Referral Mechanism. In that regard, reference is made to the response to Question 40 (first sub-paragraph).

22. What specific measures are taken in your country to detect/identify and refer to assistance possible victims of THB at the borders? What measures are taken in your country to identify victims of THB during the examination of asylum applications and prior to the return of persons whose applications are rejected?

The police act in accordance with the Directorate of Immigration's procedures on trafficking in human beings. Within the police districts, the Border Divisions and Investigation Divisions cooperate closely, where relevant, in the detection and investigation of trafficking in human beings and organised crime.

Indicators of trafficking in human beings are included in the training required for access authorisation to restricted areas of the international airport. Trafficking in human beings is also covered in the training provided to border guards, in accordance with the Frontex Common Core Curriculum.

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The Directorate of Immigration places particular emphasis on the early identification of potential victims of THB during the examination of applications for international protection.

Staff members involved in the asylum procedure receive regular training and awareness-raising sessions on THB, delivered by relevant experts. These sessions aim to strengthen their ability to recognise indicators of trafficking, respond appropriately to potential cases and ensure that such cases are handled with sensitivity and confidentiality. Particular emphasis is placed on the rights of potential victims and the appropriate procedures for referring individuals to relevant assistance and support services.

The Directorate has established internal procedures for handling cases involving potential victims of THB. These procedures are regularly reviewed and updated to reflect developments in legislation, policies and relevant best practices.

Furthermore, a designated trafficking team within the Directorate provides specialised guidance and support to staff members. Where there are indications that an applicant may be a victim of trafficking, or where uncertainty arises regarding possible indicators, staff members may consult the trafficking team at any stage of the procedure. Members of the team also participate in external training and professional development activities to maintain up-to-date knowledge of relevant developments, methodologies and international standards concerning THB.

Through these measures, the Directorate seeks to ensure that potential victims of trafficking are identified at the earliest possible stage and that their individual circumstances, rights and protection needs are appropriately considered throughout the asylum procedure.

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The Directorate of Immigration places particular emphasis on assessing potential risks faced by individuals who may be victims of THB before making decisions concerning their return to another country, including the country in which they first applied for international protection.

In such cases, an individual risk assessment is conducted to determine whether the person concerned may face a risk of re-trafficking, persecution or other serious harm upon return. The assessment takes into account all relevant information, including the individual's personal circumstances, conditions in the country of origin or previous residence, and available information from relevant national and international organisations.

Where there are indications that return could expose an individual to a real risk of re-trafficking or other serious human rights violations, the Directorate assesses the need for appropriate protection measures in accordance with applicable legislation and Iceland's international obligations.

These procedures are intended to ensure that decisions concerning the return of potential victims of THB are based on an individual assessment of the relevant risks, with due regard to the safety, rights and protection needs of the person concerned.

23. What measures are taken in your country to identify victims of THB in immigration detention centres and prisons?

Iceland does not currently operate a dedicated immigration detention centre, and therefore the identification of potential victims of trafficking is carried out within the context of an open return facility run by the National Commissioner of the Icelandic Police.

Three specialist staff members who work directly with detained individuals have received training on the identification of victims of THB. All three received this training prior to joining the facility while working for the Directorate of Immigration, equipping them with the skills necessary to identify indicators of trafficking, assess vulnerabilities, and make appropriate referrals.

In addition, the facility employs three return specialists who work closely with individuals throughout the return process. All three have completed specialised training on working with vulnerable persons in return procedures. This training has helped staff identify and respond to individuals who may be vulnerable due to trafficking, exploitation, trauma, health concerns, or other protection needs.

Specific THB training for security officers is scheduled for December 2026 by the Centre for Police Training and Professional Development of the National Commissioner of the Icelandic Police. All security officers and other staff working at the open return facility will attend this training. The aim

is to strengthen professional knowledge, promote a common understanding, and enhance the ability of staff to identify potential indicators of trafficking, exploitation, and situations where individuals may be particularly vulnerable.

Legislation providing for the establishment and operation of an immigration detention centre was adopted by Parliament in June 2026, although the centre has not yet become operational. It is proposed that staff working at the centre will receive training on trafficking related issues and that detainees will be screened for indicators of trafficking.

If the Prison and Probation Administration becomes aware that a person in custody or serving a prison sentence is a victim of human trafficking, the matter is reported to the police. Training on the identification of indicators of trafficking in human beings and appropriate response measures is planned for relevant staff.

24. What services are available in your country to provide specific assistance to particularly vulnerable victims, such as:

a. persons with disabilities;
b. LGBTI+ persons;
c. victims with children;
d. victims with severe mental and physical trauma;
e. homeless persons;
f. other.

Bjarkarhlíð strives to provide support to victims of all forms of THB and to mitigate the adverse effects of trafficking on their well-being and quality of life. Its services are accessible to persons with disabilities, including wheelchair users, and interpretation services are provided where necessary.

Bjarkarhlíð cooperates with relevant authorities and NGOs where appropriate. An example includes Rótin, an organisation that advocates for women and non-binary persons with histories of trauma and/or problematic substance use and works to promote their human rights and welfare. Rótin operates Konukot, the only emergency shelter for homeless women in Reykjavík, under a service agreement with the City of Reykjavík.

25. How do you support the (re)integration of victims of THB? What processes are in place in your country to provide assistance to victims of THB exploited abroad after their return?

The reintegration of victims of trafficking is approached as an individualised and multidimensional process, with the objective of ensuring safety, stability, access to rights and services, and the opportunity to rebuild an independent life. Experience from cases handled by Bjarkarhlíð between 2023 and 2025 indicates that reintegration needs vary considerably depending on the victim's individual circumstances, including residence status, housing and financial situation, employment situation, health needs, and experiences of violence and exploitation. Overall, reintegration is understood as a longer-term process of establishing safety, stability, social connections, rights and economic independence. In addition to meeting immediate practical needs, opportunities for language learning, social participation, volunteering and community involvement can be particularly valuable in helping victims rebuild their lives and develop a sense of belonging and independence.

A key element is stable housing and financial security. Bjarkarhlíð works closely with municipal social services, which can provide support including social housing, financial assistance and other social services. Social services may also assist victims in accessing Icelandic language courses and other measures that support their ability to participate independently in Icelandic society.

Social inclusion and participation in the community are also considered important aspects of reintegration. Bjarkarhlíð cooperates with NGOs, including the Icelandic Red Cross and the Salvation Army, where victims can participate in social activities and, where appropriate, engage as volunteers. This has proved particularly popular among the people receiving support. Participation in social activities and volunteering can provide opportunities to develop social connections, practise language skills, gain experience and become more connected to the local community, while also reducing isolation.

Residence and immigration status can be central to reintegration, particularly for foreign victims. Depending on their individual circumstances and wishes, victims received support in relation to international protection claims, residence permits, continued residence in Iceland, or voluntary return to their country of origin. This demonstrates that reintegration may involve either integration in Iceland or supported return.

Employment and economic independence are another important part of reintegration, particularly given that labour trafficking constitutes the majority of the cases handled by Bjarkarhlíð. Support may include assistance in recovering unpaid wages, addressing employment-related issues, finding new employment and processing work permits. Cooperation with labour-sector organisations, including trade unions, ASÍ, the Directorate of Labour and Occupational Safety and Health, has enabled victims to receive practical assistance relating to employment, wages and working conditions. Such support can help victims move away from exploitative employment and towards greater economic independence.

Reintegration also requires access to specialised support. Victims may have experienced psychological, financial, sexual or physical violence, threats, debt, poor living conditions and prolonged exploitation. Depending on their needs, they may therefore require support from specialised services for victims of violence, healthcare providers, social workers, sexual-violence services and other organisations.

A further important element is language and access to information. A significant proportion of the victims whose cases were handled by Bjarkarhlíð did not speak Icelandic or English. This can create additional barriers to understanding rights, accessing services and communicating with authorities. Access to Icelandic language education, appropriate interpretation and information, together with cooperation with organisations experienced in supporting foreign nationals, can therefore contribute significantly to longer-term integration.

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To date, the National Commissioner of the Icelandic Police has not handled any cases in which a returned individual has been formally identified as a victim of human trafficking who had been exploited abroad. Nevertheless, in cases involving individuals assessed as being in a particularly vulnerable situation, the authorities have, where appropriate, contacted relevant support organisations in the person's country of origin or country of residence to facilitate reception arrangements and discuss appropriate follow-up measures upon return. Depending on the circumstances of the case, another measure that may be considered is informing the competent law enforcement authorities in the receiving country of the person's return, where this is deemed necessary and appropriate.

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Within its area of responsibility, the Directorate of Immigration places particular emphasis on identifying potential victims of THB and assessing their individual protection needs prior to return. Where indicators of trafficking are identified, the Directorate seeks to ensure that the individual's circumstances are appropriately assessed, including any potential risks of re-trafficking, persecution or other serious harm upon return.

Furthermore, the Directorate provides individuals identified as potential victims of THB with information on the assistance and support services available to them in the receiving country, including relevant organisations and available protection measures.

The provision of assistance and support following return, including accommodation, healthcare, psychological support and social services, falls within the responsibilities of the competent authorities and relevant service providers in the receiving country.

26. If there is a provision in your country's law that provides for the possibility of issuing a residence permit owing to the victim's personal situation, how is this interpreted in practice? Please provide examples.

In Iceland, a residence permit may be granted to potential victims of THB on the basis of their personal circumstances. This permit, commonly referred to as a reflection period residence permit, is intended to provide individuals who may have been subjected to trafficking with sufficient time to reflect on their situation and consider their available options. In practice, this means that a potential victim of THB may be granted a reflection period residence permit regardless of whether a criminal investigation has been initiated, thereby ensuring that the individual's immediate protection needs are considered independently of any criminal proceedings.

The provision, Art. 76(1)a of the Act No. 80/2016 on Foreign Nationals, has not yet been applied in practice.

27. What measures are in place to ensure that the identity, or details allowing the identification, of a child victim of trafficking are not made publicly known?

Public employees working with child victims, including child protection services, social services, and law enforcement authorities, are subject to confidentiality obligations under the Administrative Procedures Act No. 37/1993. These safeguards apply equally to child victims of trafficking in human beings and are intended to prevent the disclosure of information that could lead to their identification.

The general duty of confidentiality applicable to public employees, cf. Art. 42(1) of the Administrative Procedures Act, prohibits them from disclosing or using information concerning matters that are to remain confidential and that have come to their knowledge in the course of their work. A breach of confidentiality may also arise where an employee fails to take adequate measures to prevent confidential information from coming to the attention of unauthorized persons.

A public employee's breach of confidentiality is punishable pursuant to Art. 136 of the General Penal Code, cf. Art. 42(5) of the Administrative Procedures Act. Furthermore, in the context of law enforcement activities, the intentional disclosure of personal data in violation of Act No. 75/2019 on the Processing of Personal Data for Law Enforcement Purposes is punishable pursuant to Art. 136 of the General Penal Code, cf. Art. 33 of that Act.

The Child Protection Act No. 80/2002 further provides that child protection authorities are subject to the same duty of confidentiality, cf. Art. 4(8).

Any exchange of information between competent authorities must comply with Act No. 90/2018 on Privacy and the Processing of Personal Data, cf. Art. 46(1) of the Administrative Procedures Act, as well as Art. 11 of the Act on the Processing of Personal Data for Law Enforcement Purposes.

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In criminal proceedings, courts may restrict public access to hearings, inter alia, in order to protect victims, cf. Art. 10 of the Criminal Procedure Act No. 88/2008.

Furthermore, the publication of judicial decisions is subject to safeguards designed to protect privacy and personal data. Pursuant to the Courts Act No. 50/2016, due regard must be given to individuals' constitutionally protected right to privacy, as well as to statutory provisions governing data protection and the processing of personal data. When judgments are published, information concerning the private, financial, or commercial interests of individuals or legal persons that it is reasonable to keep confidential must be removed, cf. Art. 20(2), 28(2), and 38(2) of the Courts Act.

These safeguards are further elaborated in Rules No. 3/2022 of the Judicial Administration on the publication of judgments and decisions on court websites. The Rules provide several mechanisms to protect privacy and personal data, including the withholding of decisions from publication, anonymisation of individuals referred to in judicial decisions, and the redaction of sensitive information. Where anonymity and redaction are insufficient to protect confidentiality, courts may publish a summary of the decision instead of the full text or postpone publication where necessary to safeguard privacy. The Rules also permit enhanced anonymisation or redaction where special circumstances so require, including where publication could be particularly burdensome to the persons concerned or where the small size of the community increases the risk of identification.

28. What measures are in place aimed at encouraging the media to protect the private life and identity of victims?

The Media Act No. 38/2011 stipulates that media service providers shall respect human rights and equality, as well as the right to privacy, unless it’s democratic role and the public’s right to information require otherwise, cf. art. 38(1).

29. Have there been cases of diplomatic households (of your country’s diplomats abroad and of foreign diplomats in your country) employing domestic staff in conditions which could be forced labour or human trafficking? If yes, how was the issue of diplomatic immunity addressed? How were the victims identified, assisted and protected?

There have been no cases.

30. What specific steps are taken in your country to identify victims of THB amongst persons recruited and exploited by terrorist/armed groups?

The threat posed by terrorist or armed groups has historically been limited in Iceland. Nevertheless, there remains a risk that vulnerable individuals and groups may be subject to exploitation. The Icelandic Police does not currently employ a formal, systematic vulnerability assessment framework to identify individuals who may be actively exploited, groomed, or manipulated by terrorist or armed groups.

However, there are preventive efforts in place. A specialized unit within the Icelandic Police monitors and analyzes digital exploitation and online harms, including indicators that such activities may evolve into recruitment, radicalization, or other forms of exploitation by terrorist or armed groups.

31. Are there requirements in your country's legal framework for the detection and removal of THB-related Internet content, and what are the sanctions for non-compliance? Is there a code of conduct for providers? If a person is detected as a presumed victim of THB in the process, how is this person referred to assistance?

Iceland does not currently have specific legislation, codes of conduct or formal cooperation mechanisms requiring internet service providers or online platforms to detect or remove content related to THB.

III. INVESTIGATION, PROSECUTION, SANCTIONS AND MEASURES (Articles 4, 18, 19, 23, 24, 27, 28 and 30)

32. Is the abuse of a position of vulnerability part of the human trafficking offence in your country's law? How are the concepts of "vulnerability" and "abuse of a position of vulnerability" defined in law? Have they been subject to judicial interpretation? If yes, please provide relevant case-law.

Since 2009, cf. Act No. 149/2009 amending the General Penal Code, the abuse of a position of vulnerability has constituted one of the means by which the offence of human trafficking under Art. 227a of the General Penal Code may be committed. The explanatory notes accompanying the bill refer to Art. 4(a) of the Council of Europe Convention on Action against Trafficking in Human Beings.

The provision was further amended in 2021 by Act No. 79/2021 amending the General Penal Code. For the purposes of the present question, the relevant means is formulated as follows: *"by taking advantage of the person's vulnerable situation, lack of knowledge, or defenselessness, or by exploiting a position of superiority."* The explanatory notes accompanying the 2021 amendment refer to Art. 3 of the Palermo Protocol and note that, according to the travaux préparatoires to that instrument, abuse of a position of vulnerability exists where a victim of trafficking has no real or acceptable alternative but to submit to the will of the perpetrator. The amendment was intended to strengthen the authorities' ability to combat labour exploitation, which is frequently directed at asylum seekers, refugees, migrant workers, and other foreign nationals. The explanatory notes further state that a position of superiority may, inter alia, arise where a victim of trafficking is financially dependent on the perpetrator.

The concepts have not been subject to judicial interpretation yet.

33. Is the special vulnerability of the victim considered as an aggravating factor for the offender's sentence?

It is expressly provided in Art. 227a(2) of the General Penal Code that when a trafficking offence is committed against a child, this shall be considered as an aggravating factor for the offender's sentence.

More generally, the special vulnerability of the victim is not expressly listed as an aggravating factor under Art. 70 of the General Penal Code, which sets out general considerations relevant to sentencing. The list is not exhaustive, however, and courts may take other circumstances into account when determining the appropriate sentence. This is illustrated by Supreme Court judgment No. 224/2010, the only conviction for trafficking in human beings in Iceland. In determining the sentence, the Supreme Court expressly attached significance to the victim's vulnerable position, noting that the defendants had deprived a young woman, who was in a particularly vulnerable situation, of her freedom of movement and choice of residence for the purpose of sexual exploitation.

34. According to national case-law, what forms of vulnerability are mostly abused by offenders in human trafficking cases? Please provide specific examples that show how the concept of "abuse of a position of vulnerability" is used in practice. What are the challenges in its application? Is it sufficient to prove the existence of a position of vulnerability of the victim, or must it also be proven that the defendant knew or should have known of the victim's vulnerability, and intentionally manipulated the victim on this basis?

There are limitations to answering this question, as the relevant concepts have not yet been interpreted by the courts. The only case that resulted in a conviction for human trafficking predated the introduction of the concept of the *abuse of a position of vulnerability* into Art. 227a of the General Penal Code. The most recent trafficking case, which resulted in an acquittal before the Court of Appeal, concerned child victims and therefore did not require the court to examine the means element of the offence.

Nevertheless, recent substantial increases in funding and resources for the police are expected to strengthen the investigation and prosecution of trafficking cases. It is therefore anticipated that the National Action Plan's objective of increasing both investigations and convictions in human trafficking cases will be achieved.

35. Is the concept of "abuse of a position of vulnerability" addressed in criminal justice training? Is there any specific guidance on applying this concept? Please provide copies of guidance and/or training materials that shed light on how this concept should be applied in practice.

No specific guidance or training material has been developed specifically on the interpretation or practical application of the concept of "abuse of a position of vulnerability".

Continuing education for judges in Iceland is governed by Act No. 50/2016 on the Judiciary. Although the Act does not impose a formal obligation on judges to participate in regular training, it recognises continuous professional development as a natural and integral part of judicial work. The Icelandic Judicial Administration is responsible, inter alia, for organising continuing education for judges and

other court employees. Judges and court staff are regularly offered training on legal and professional issues, with a view to ensuring a broad and varied programme of instruction.

In October 2025, a dedicated training session on THB was delivered by a lawyer at the Icelandic Human Rights Institute. The training covered, among other things, the Palermo Protocol to the United Nations Convention against Transnational Organized Crime, the Council of Europe Convention on Action against Trafficking in Human Beings, the trafficking offence under Art. 227a of the General Penal Code, indicators and characteristics of trafficking, and interviews with victims.

In addition, judges and court staff have participated in a range of training activities addressing issues relevant to vulnerability and exploitation. These have included lectures on victims' rights, power dynamics and the legal status of victims in criminal proceedings; consent, autonomy and free will in the context of rape offences; trauma-informed communication; the assessment of witness credibility and children's testimony; and children's rights in the justice system. Together, these training activities provide knowledge and perspectives relevant to the identification and assessment of situations involving vulnerability and potential exploitation.

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The Director of Public Prosecutions is planning to provide training on THB in spring 2027. The training will cover a range of issues, including the concept of "abuse of a position of vulnerability".

Prosecutors have also attended a number of seminars and webinars on THB, several of which addressed the concept of "abuse of a position of vulnerability". In 2025 and 2026, a prosecutor from the District Prosecutor's Office attended the 4th and 5th meetings of specialised THB prosecutors at Eurojust, where the concept of "abuse of a position of vulnerability" was discussed in some detail. Prosecutors from the District Prosecutor's Office and the Reykjavik Metropolitan Police also participated in the Forum against THB organised by the Council of the Baltic Sea States in September 2025, where the topic formed part of the discussions. In addition, a prosecutor from the District Prosecutor's Office participates in EMPACT THB Operational Action 2.1 on judicial cooperation, within which the concept of "abuse of a position of vulnerability" has been examined and discussed in detail.

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The University of Akureyri's police diploma programme includes training on violence and power relations, THB, victims' rights, social disadvantage and interviewing persons in vulnerable situations. These topics are addressed across several courses, including *Violence and Power Relations, Diversity and Policing, Police Psychology, and Police Investigations and Cybercrime.*

The Centre for Police Training and Professional Development addresses the interviewing of vulnerable persons as part of detective education. Training programmes for operational police leadership, border guards, as well as shorter professional development courses, also cover the identification of and response to vulnerability, including when interviewing persons with disabilities, victims of THB, and others whose circumstances require particular attention to communication, support and safeguards.

36. What procedures and measures exist in your country to take into account the specific needs of vulnerable victims at the different stages of criminal proceedings?

Reference is made to the response to Question 27 regarding the protection of victims privacy in criminal proceedings.

The Criminal Procedure Act No. 88/2008 contains a number of provisions enabling the authorities and courts to take account of the particular needs of vulnerable victims throughout criminal proceedings.

Under Art. 41, victims of trafficking in human beings may, upon request, have a legal rights advocate appointed at their request where considered to have suffered significant physical or psychological harm, or the offence was committed by a person close to the victim, and the victim requires special assistance to safeguard his or her interests. An advocate may also be appointed without a request if those conditions are met and the victim is unable adequately to safeguard his or her own interests. Appointment must be made as soon as the occasion arises. Where the victim is under 18 years of age, appointment of a legal rights advocate is mandatory.

Following the institution of criminal proceedings, the court appoints the victim's legal rights advocate where the statutory conditions are satisfied, cf. Art. 42. The advocate's role is to safeguard the victim's interests and provide legal assistance, including in relation to claims for compensation, cf. Art. 45. The advocate may attend police interviews and court hearings and is granted specified rights of access to case materials, as well as the right to put questions and make submissions concerning the victim's interests, cf. Art. 46–47.

During the investigation stage, interviews must normally take place in private and, where possible, at a police station or other suitably equipped premises, cf. Art. 62. Interpretation services must be provided where necessary, including sign-language interpretation or other appropriate communication support, cf. Art. 63. Victims and witnesses with disabilities must also be offered the assistance of a suitable support person during police interviews, cf. Art. 61.

Special arrangements are available for particularly vulnerable victims and witnesses. Court hearings involving a victim under 15 years of age must normally be conducted in premises specially designed for interviewing children. Such facilities may also be used when taking evidence from other child witnesses or from victims and witnesses with intellectual, psychosocial or sensory impairments, cf. Art. 9. In addition, participation in hearings and the giving of evidence by videoconference may be permitted under Art. 9, 113 and 116.

During trial, the judge may disallow questions that are ambiguous, misleading, unnecessarily insulting or hurtful, cf. Art. 122. At the request of the prosecutor or witness, the accused may be required to leave the courtroom while a witness gives evidence if the accused's presence would be particularly burdensome and could affect the witness's testimony, cf. Art. 123. When evidence is taken from a witness under 15 or a witness with a disability, the court may obtain the assistance of a specialist. The accused and defence counsel may be excluded from the interview room where their presence would be particularly burdensome, while retaining the opportunity to observe the interview and submit questions. Witnesses with disabilities must also be offered the assistance of a suitable support person, cf. Art. 123.

In exceptional circumstances, the court may protect the identity of a witness where disclosure would endanger the life, health or liberty of the witness or a close relative, provided that this does not materially prejudice the defence, cf. Art. 122.

37. If you have criminalised the use of services of a victim of THB, how is this provision applied in practice? Please provide any relevant case-law.

The use of services provided by a victim of trafficking in human beings has not been criminalised in Iceland. As noted in the response to Question 12, it is envisaged that a review will be undertaken to

assess whether a specific offence criminalising the knowing use of services provided by victims of trafficking should be incorporated into the General Penal Code.

38. What technology-based tools and initiatives exist in your country to support investigations and enhance prosecution of THB cases? What training is provided to law enforcement officials, prosecutors and judges on THB facilitated by information and communication technology?

Across the bigger police districts, specialised cybercrime units or digital forensics experts are involved in securing, preserving and analysing digital evidence. These specialists support investigations into organised crime, including THB, by examining electronic devices, social media content, messaging applications and other online platforms used for the recruitment, control and exploitation of victims. Particular emphasis is placed on maintaining and developing expertise through continuous professional development and specialised training on THB for digital investigators and other personnel involved in THB cases. Training on cybercrime, including THB, is included in courses and advanced education programmes provided by the Center for Police Training and Professional Development.

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In the autumn of 2026, the Minister of Justice will submit a bill to parliament proposing significant restructuring amendments of the Icelandic police, reducing the number of police districts from nine to three. The reform is intended to strengthen the police's operational and investigative capacity, improve coordination across districts, and create better conditions for the development of specialised expertise and investigative teams.

The reform is particularly relevant to the investigation of organised and transnational crime, including THB. Larger police districts are expected to provide greater capacity for complex investigations, intelligence and analytical work, digital and specialised investigations, and the flexible deployment of personnel and expertise across jurisdictional boundaries. The proposal also emphasises enhanced cooperation, standardised procedures, and the ability to respond to crimes that increasingly operate across districts and national borders.

The role of the National Commissioner of Police will be further clarified with regard to national coordination, intelligence, analysis and international cooperation, while specialised functions may be assigned to specific police authorities on a nationwide basis in order to maintain and further develop expertise. The new structure is scheduled to enter into force on 1 January 2028 and is not expected to reduce police staffing or local policing services.

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Regarding the training of prosecutors, reference is made to the activities outlined in the response to Question 35, which included consideration of the online dimension of THB.

39. In what ways, if any, does your country utilise provisions from the Council of Europe Cybercrime Convention (Budapest Convention) to fight THB? If not, why is that the case?

The police make extensive use of international cooperation mechanisms, including mutual legal assistance requests under the Council of Europe Cybercrime Convention, to obtain digital evidence from foreign jurisdictions. In THB investigations, data have been obtained from service providers such

as Meta, Google and Microsoft, including both basic subscriber information and other evidential data. In addition, use is made of other available international cooperation mechanisms, in particular cooperation through Europol and, where relevant, Eurojust.

The cybercrime unit of the Reykjavík Metropolitan Police has used open-source intelligence (OSINT) techniques in THB investigations, including the collection and analysis of information from websites advertising prostitution. This work aims to identify links between advertisements and detect patterns that may indicate organised criminal activity and victim exploitation.

The Reykjavík Metropolitan Police has also launched a pilot project using artificial intelligence tools in a secure and isolated environment to assist in the analysis of large volumes of investigative material. The technology enables semantic searches across mobile phone extractions and other electronic data, helping investigators identify relevant information and potential links between individuals, communications, locations and events. AI tools have further been used for preliminary translation of foreign-language material, speech-to-text transcription of audio recordings, and the preparation of summaries and draft reports. These technologies serve as investigative support tools only, and all results are subject to verification by investigators.

Part II – Country-specific follow-up questions

40. Please provide information on measures taken in your country in respect of the following recommendations made in GRETA's previous reports:

- set up a formalised National Referral Mechanism for the identification and referral to assistance of victims of THB, defining the roles of all frontline actors who may come into contact with victims of trafficking;

In the draft of Iceland's new National Action Plan against Trafficking in Human Beings (2026-2030), the first measure provides for the establishment of a National Referral Mechanism (NRM) to safeguard the human rights of all victims of trafficking in human beings, irrespective of the form of exploitation. The measure is scheduled for implementation during 2026-2027 and will be led by the Ministry of Justice and Bjarkarhlíð in close cooperation with frontline stakeholders. The development of the NRM will take into account the twelve principles for effective referral mechanisms set out in the 2022 OSCE/ODIHR publication *National Referral Mechanisms: Joining Efforts to Protect the Rights of Trafficked Persons*.

The mechanism will clearly define the roles and responsibilities of all actors involved in the identification of potential victims of trafficking in human beings and the provision of support and services to victims. It will also include a flowchart setting out referral pathways between competent authorities and service providers, ensuring continuity of assistance and making clear where victims should be referred when the responsibilities of one actor come to an end. The objective is to ensure that victims receive timely and appropriate support throughout the identification and assistance process, regardless of the time of day or their specific circumstances.

- provide safe and suitable accommodation for all victims of THB and ensure long-term, sustainable funding for NGOs providing assistance to victims of trafficking;

In June 2026, a new four-year cooperation agreement was signed with Bjarkarhlíð, further strengthening Bjarkarhlíð's coordinating role in trafficking cases. Under the agreement, Bjarkarhlíð is

responsible for ensuring that services are provided only to individuals whom, based on its expertise and assessment, it considers to be victims of trafficking beyond reasonable doubt. This arrangement underscores that victims' entitlement to protection and support is independent of any criminal investigation or proceedings.

To ensure continuity of assistance for victims of trafficking, the agreement and the Government's National Action Plan against Trafficking in Human Beings provide that an evaluation shall be carried out by the Ministry of Justice and the Ministry of Social Affairs and Housing by 1 February 2030. The evaluation will comprehensively assess the implementation and effectiveness of the arrangements during the contractual period and will serve as the basis for decisions regarding the future continuation of the project.

As a general rule, the relevant municipal social services are responsible for securing accommodation for victims of trafficking. In cases arising outside normal working hours, the reception centre for applicants for international protection has served as the initial point of contact and provided temporary assistance until the responsible municipal authorities can take over.

- adopt a specific legal provision on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they were compelled to do so, and/or develop guidance for police officers and prosecutors on the non-punishment principle, and include it in the training of police officers, prosecutors, judges and lawyers;

In line with Iceland's new National Action Plan against Trafficking in Human Beings (2026-2030), a working group composed of representatives of the criminal justice system and academia will be established to review the existing legal framework and assess the need for further measures to ensure the effective implementation of the non-punishment principle for victims of trafficking in human beings.

- provide training for labour inspectors and trade union inspectors, as well as tax authorities, law enforcement officers, prosecutors and judges, on THB for the purpose of labour exploitation.

Regarding the training of judges, reference is made to the response to Question 35. The training described in that response included indicators and characteristics of THB for the purpose of labour exploitation.

Regarding the training of prosecutors, reference is made to the activities outlined in the response to Questions 35, which included detailed consideration of labour exploitation. Furthermore, the prosecutor from the District Prosecutor's Office participating in EMPACT THB Operational Action (OA) 2.1 on judicial cooperation is also a participant in OA 2.7 on labour exploitation.

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Training on THB is provided to police staff through the Center for Police Training and Professional Development (CPTPD). An Expert Council on Human Trafficking[5] has been established by the Center for Police Training and Professional Development (CPTPD) to provide guidance and support regarding the training of police staff on THB. In December 2025, the Expert Council organized an 8-hour training

[5] Referred to as the Training Committee on Trafficking in Human Beings in the Report submitted by the authorities of Iceland on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2023)09 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Iceland: Third evaluation round.

course for police officers in Iceland. Plans are underway to develop short practical video modules for police officers, which will be made available on the police intranet.

Human trafficking is also included in the curriculum of the CPTPD's two advanced training programmes, which are offered annually and last five to six months (10 ECTS credits). One programme focuses on criminal investigations, including the specific characteristics and challenges of investigating THB cases. The other focuses on leadership training for shift supervisors and covers indicators and impacts of THB, including training in on-site identification and assessment.

Training on THB is included in the curriculum for students enrolled in police studies at the University of Akureyri. The 6 ECTS course on criminal procedure includes instruction on THB cases. The 6 ECTS course on violence and power relations devotes eight days to THB and its various manifestations.

In the practical training at CPTPD for diploma students in police studies, students receive instruction on the scope and nature of THB, as well as on case registration within the police case management system (LÖKE). Training includes both theoretical and practical components, with detailed guidance on the proper registration and handling of such cases. Students prepare reports, register simulated or case-based THB incidents in LÖKE, and review their work in detail with instructors and fellow students.

Law enforcement personnel involved in border control receive training through the Icelandic Police e-learning platform, Eloomi, on offences committed at the external borders of the Schengen area, indicators of criminal activity, organised crime, and THB. The training covers the legal framework on migrant smuggling and THB, forms of exploitation linked to border-related crime, the distinction between migrant smuggling and THB, and good practices for preventing and combating migrant smuggling and THB.

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The Administration of Occupational Safety and Health (AOSH) has strengthened training and capacity-building concerning trafficking for the purpose of labour exploitation during 2024-2026.

General education on indicators of THB has been provided to all AOSH staff during this period, including training delivered by representatives of the Icelandic Confederation of Labour (ASÍ) and the Reykjavík Metropolitan Police. The training has focused on the identification of possible victims and appropriate the referral of cases. A written checklist on trafficking indicators and victim referral pathways has also been developed and is used both as a training tool and a practical reference.

AOSH has further strengthened its expertise through international cooperation and exchanges with counterparts in other Nordic and European countries, as well as through inter-agency cooperation with relevant Icelandic authorities. These activities have focused on the prevention and detection of labour exploitation, victim identification, and effective responses to labour-market crime.[6]

[6] In early 2025, two AOSH specialists participated in a one-week study visit to Norway. The visit focused on the Norwegian inter-agency model for preventing and detecting labour-market crime, including serious labour exploitation. AOSH has also held structured discussions with the Finnish authorities concerning their approach to labour exploitation and the rights and protection available to victims of trafficking and exploitation.
In 2026, AOSH invited two Lithuanian counterparts, one representative of the Lithuanian Labour Inspectorate and one from the Lithuanian Tax Authority, to Iceland for an exchange of experience and operational discussions concerning inspections and inter-agency action against labour-market crime. In spring 2026, AOSH also organised a large inter-agency meeting attended by the police and Iceland Revenue and Customs contact persons participating in the co-operation platform against labour-market crime, together with several AOSH staff involved in the platform. The meeting supported shared learning, closer operational co-operation and the exchange of experience concerning the detection of serious labour exploitation and other labourmarket violations.

More targeted training for inspectors who are particularly likely to encounter potential victims is planned for the end of 2026. The training will focus primarily on inspectors working in construction, retail, restaurants and other service sectors and is intended to strengthen their ability to recognise indicators of trafficking for labour exploitation, communicate with potential victims, and ensure appropriate referral to the police and victim-support services.

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In 2024, a group of trade union inspectors visited Helsinki in a study visit organised by The Icelandic Confederation of Labour (ASÍ) in collaboration with the European Labour Authority (ELA). The agenda was focused on labour exploitation and the inspectors met and had presentations from HEUNI, the Finnish occupational safety and health inspectorate, police, RIKU and ELA. Inspectors also took part in a workshop on interview techniques.

No structured training on THB for the purpose of labour exploitation has been provided to trade union inspectors or general staff of the Icelandic Revenue and Customs Service or to specialists engaged in tax supervision.

41. Please provide information on developments in your country since GRETA's third evaluation report concerning:

- emerging trends of trafficking in human beings;

Since GRETA´s third evaluation report was published in 2023, a few developments have occurred. Overall, Iceland continues to report relatively low numbers of identified THB cases compared with many European countries, but the threat environment is evolving.

Recent report "The Organized Crime Assessment 2021–2025" published by the National Commissioner of the Icelandic Police indicates a gradual shift toward a more complex threat environment driven by transnational organized crime. Criminal networks increasingly exploit migration flows (especially from South America, China, Middle East, and Africa), labour mobility, digital communication platforms, and cross border connections. The main vulnerabilities continue to be among migrant workers, asylum seekers, women being sexually exploited, and children.

The most significant emerging trends are greater involvement of transnational organized crime groups in Iceland, increased exploitation of legitimate migration and labour markets, growing importance of borders and international police cooperation, continued vulnerability of migrant workers and asylum seekers and the increased use of online platforms for recruitment and exploitation. There is a shift from viewing THB as a social welfare issue toward understanding it as a part of organized criminal activity. At the same time, border management, international cooperation, and intelligence-led prevention have become increasingly important components of Iceland's response to trafficking in human beings.

There has been a growing number of cases in which drug couriers are suspected of being victims of THB. In some instances, this has involved repeated exploitation, both for sexual exploitation as well as exploitation for criminal activities, specifically the cross-border transportation of drugs.

In the work of Bjarkarhlíð, several emerging trends have been identified in relation to THB:

Labour trafficking remained the predominant form of exploitation throughout the reporting period. While labour exploitation continued to account for the majority of cases, victims were identified across an increasingly diverse range of sectors, including hospitality and tourism, construction, fish processing, and beauty and wellness services. Beauty and massage establishments emerged as an area of particular concern. Cases involving massage parlours, nail salons and other beauty establishments became increasingly visible during 2024-2025.

Recruitment-related abuse and dependency mechanisms remained common features of labour trafficking cases. Victims were often recruited abroad under misleading promises regarding employment and working conditions and subsequently became dependent on employers or intermediaries through debt, wage deductions, employer-controlled accommodation, transport, or immigration-related arrangements.

There are indications that trafficking for sexual exploitation may be under-identified. While labour trafficking accounted for most cases handled by Bjarkarhlíð, information from other agencies and organisations suggests that sexual exploitation may be more prevalent than reflected in the identified caseload. In several cases identified in 2025, indicators of trafficking emerged only after victims had sought assistance for sexual or intimate-partner violence.

Domestic servitude emerged as a potential area of concern. A case identified in 2025 highlighted vulnerabilities associated with domestic work within private households, including dependence on host families, social isolation and limited oversight. The case also gave rise to concerns regarding the vulnerability of au pairs to exploitation.

Victims identified during the reporting period came from a wide range of nationalities and backgrounds. The cases indicate that vulnerability to trafficking is closely linked to factors such as migration status, recruitment practices, employment conditions and dependency relationships, rather than nationality itself.

- the legislation and regulations relevant to action against THB;

Reference is made to the response to Question 3 regarding proposed amendments to the provisions of the General Penal Code concerning the purchase of sexual services, and to the responses to Questions 7(g) and 11 regarding proposed amendments to the provisions of the Act No. 80/2016 on Foreign Nationals.

New legislation on cooperation and supervision in the labour market No. 105/2024, took effect on 1 January 2025, addressing several of GRETA's recommendations on measures to prevent and combat trafficking for the purpose of labour exploitation. The legislation is built on four main elements:

1. A new cooperation committee on measures against labour-market crime was established, composed of representatives from government and labour market organizations. Ministers responsible for economic affairs, labour, taxation, policing, and law enforcement also sit on the committee. It must meet at least once a year in full representation and is tasked with proposing government policy and action plan on labour-market crime, delivering a policy and action plan to the minister of labour within one year after parliamentary elections.
2. A formal government agency cooperation platform was enshrined in law, continuing the arrangement that had existed since 2019 by agreement. This platform involves the police, the tax authority, and the Administration of Occupational Safety and Health (AOSH), which leads the cooperation. The platform strengthens and coordinates oversight activities, including joint operations, and establishes formal regular consultations with labour market organizations.

3. Amendments to occupational safety legislation (Act No. 46/1980 on working conditions, health, and safety at workplaces) increased AOSH's powers to impose sanctions for serious violations of the law.
4. Transfer of responsibilities for monitoring laws on posted workers, temporary work agencies, workplace ID cards, and workplace inspections from the Directorate of Labor to Administration of Occupation of Safety and Health. The purpose of this transfer was to make public labour market supervision more efficient, by consolidating all oversight under a single institution.

- the institutional and policy framework for action against THB (co-ordinating bodies, specialised entities, national rapporteur or equivalent mechanism, involvement of civil society, public-private partnerships);

The Steering Group on Action against Trafficking in Human Beings monitors the implementation of the National Action Plan and the Council of Europe Convention on Action against Trafficking in Human Beings. The group is composed of representatives of all ministries responsible for implementing the National Action Plan. The Chair and Vice-Chair, both serving as legal advisers within the Ministry of Justice, represent two complementary areas of expertise: human rights, through the Department of Equality, and organised crime, through the Department of International Affairs. The Ministry of Education and Children and the Ministry of Social Affairs and Housing are also represented by two members. Others include the Ministry of Health and the Ministry for Foreign Affairs. The Steering Group maintains contact with key stakeholders involved in combating trafficking in human beings, including non-governmental organisations, by convening biannual consultation meetings.

Bjarkarhlíð plays a pivotal role in coordination and support for victims of THB. Its mandate was further developed and defined in a 4-year cooperation agreement with the authorities in the summer of 2026. Bjarkarhlíð receives and assists presumed victims of THB who seek support and coordinates the response of social welfare services and relevant partner agencies, including the police, the Directorate of Labour, the Administration of Occupational Safety and Health, and the Directorate of Immigration. The objective is to facilitate victims' access to appropriate assistance and support.

Bjarkarhlíð develops and disseminates educational and guidance materials for professionals involved in providing services to victims of THB. The materials cover trafficking in human beings, victim identification, appropriate responses, and victim-centred approaches to service provision. Bjarkarhlíð organises training on THB at least once a year for professionals involved in supporting victims of trafficking. It also collects statistics on participation and evaluates participants' knowledge in order to inform the further development of training materials.
In addition, Bjarkarhlíð publishes an annual report containing information on the implementation of the project, including statistics on the number of victims assisted, forms of trafficking identified, victims' gender and country of origin, assistance provided, and referrals made to other services.

- the current national strategy and/or action plan for combating trafficking in human beings (objectives, main activities, budget, bodies responsible for the implementation, monitoring and evaluation of results);

The draft of Iceland's new National Action Plan against Trafficking in Human Beings (2026-2030) was published on the Government's consultation portal at the end of August 2026. The consultation period has concluded, and the comments received are currently under review. The Action Plan is scheduled to be presented in November 2026.

Building on the experience gained from previous government action plans against THB, the draft places particular emphasis on further strengthening the resilience and coordination of systems and institutions involved in combating THB. Cooperation between relevant sectors will be enhanced and reporting and referral pathways clarified with the timely creation of a National Referral Mechanism, particularly with regard to child victims of trafficking. Efforts will also be made to improve targeted training for professionals on THB and appropriate responses where there are indications that a person may be a victim of trafficking. Particular emphasis will be placed on training and capacity-building for the police and other actors within the criminal justice system, with the aim of increasing the number of trafficking cases investigated and prosecuted, and ultimately the number of convictions of traffickers.

The Action Plan is guided by the principle that each measure should be clear, specific, realistic, relevant and time-bound. It identifies, as clearly as possible, the entity responsible for each measure, the actors involved in its implementation, and the partners expected to cooperate in its delivery. It is structured around four thematic areas:

1. Cooperation and coordination
2. Capacity-building and prevention
3. Support and protection
4. Follow-up and implementation

Responsibility for individual measures under the National Action Plan generally lies with the relevant ministries, while implementation is undertaken by a range of public authorities and specialised service providers. These include, among others, Bjarkarhlíð, the National Agency for Children and Families (including Barnahús), the National Commissioner of the Icelandic Police, the police districts, the District Prosecutor's Office, the Public Prosecutor's Office, the Directorate of Immigration, the Prison and Probation Administration and the Directorate of Labour.

The Steering Group on Action against Trafficking in Human Beings, composed of representatives of all ministries responsible for implementing the National Action Plan, is tasked with monitoring the implementation of both the Action Plan and the Council of Europe Convention on Action against Trafficking in Human Beings. The Steering Group is mandated to submit reasoned proposals to the Minister of Justice concerning revisions to or updates of the Action Plan.

The Steering Group will convene biannual consultation meetings with key stakeholders involved in combating trafficking in human beings, including non-governmental organisations. These meetings will review progress in implementing the Action Plan, facilitate the systematic dissemination of new knowledge and emerging trends, and identify challenges in the field.

The Ministry of Justice will support the implementation of individual measures through an annual contribution of ISK 15 million provided through a dedicated action fund, amounting to a total of ISK 75 million over the period 2026-2030. This funding is in addition to the annual budget appropriations and grants provided to public institutions and non-governmental organisations. Allocations will be made following a professional assessment by the Ministry.

To promote transparency and accountability, the Action Plan will be presented through an online dashboard on the Government Offices' website, allowing the status and progress of individual measures to be monitored. The dashboard will be updated regularly, following the biannual consultation meetings with stakeholders.

- recent case-law concerning THB for different forms of exploitation.

Since GRETA's third evaluation report there has been one THB case before the Landsréttur Court of Appeal.[7] The case concerned the alleged THB for labour exploitation of four victims while they were minors. The defendant, a woman married to their father, was acquitted.

Part III - Statistics on THB

42. Please provide the following statistics, per year starting with 2023, where available disaggregated as indicated below:

- Number of presumed victims and identified victims of THB in the sense of having been recognised by a state institution or mandated NGO as bearers of rights to services provided for by the Convention (with breakdown by sex, age, nationality, form of exploitation, internal or transnational trafficking, and body which identified them).

In 2023, total of 78 individuals were recorded in trafficking-related cases by Bjarkarhlíð, 22 women and 56 men. The majority were between 31 and 40 years of age, with the youngest person aged 22 and the oldest 54. The cases involved persons of various nationalities, including Vietnamese, Latvian, Romanian, Lithuanian, Brazilian, Somali, Chinese, Filipino, Egyptian, Portuguese, Eritrean and Ghanaian nationality. The principal forms of exploitation identified were labour trafficking, sexual exploitation and forced criminality. In approximately 88% of cases, Bjarkarhlíð assessed that there was a confirmed suspicion of trafficking, while in approximately 12% of cases the suspicion was not confirmed.

In 2024, Bjarkarhlíð handled 55 trafficking-related cases. Approximately 54% of the persons concerned were men, 44% were women and 2% were non-binary. Of the 55 cases, 44 concerned labour trafficking and six concerned sexual exploitation. The remaining cases involved other forms of suspected exploitation that were ultimately not considered trafficking cases. The persons concerned included nationals of countries in Asia, Eastern Europe and Africa, as well as Icelandic nationals. A significant proportion of the cases related to a large labour trafficking investigation involving a group of Vietnamese workers. Most cases were identified through, or involved cooperation with, public authorities and other service providers. Police cooperation was recorded in 44 cases, while labour-sector organisations and authorities were involved in a substantial number of cases.

In 2025, Bjarkarhlíð recorded 44 trafficking-related cases. Of these, 33 concerned labour trafficking, 10 concerned sexual exploitation and one concerned domestic servitude. The sexual exploitation cases involved nine women and one gender-diverse person. Victims were identified as Icelandic, Chinese, Venezuelan, Nigerian, Vietnamese, Palestinian, Brazilian, Ghanaian and Filipino nationals, among others. The labour trafficking cases concerned persons employed in sectors including restaurants, tourism, construction, fish processing and beauty services. Twenty-seven individuals had migrated in search of employment or improved living conditions. Twenty-two individuals did not have a right of residence in Iceland but wished to remain in the country; several subsequently applied for international protection or received assistance concerning residence permits or return.

The available data do not provide a complete breakdown by age, nationality, form of exploitation, sex, internal or transnational trafficking, and identifying body for all cases. Nor do they distinguish systematically between presumed victims and victims formally recognised as holders of rights and services under the Convention. However, the figures demonstrate that the majority of trafficking-

[7] Judgment of the Landsréttur Appeal Court, 17 February 2023 in case no. 324/2022.

related cases recorded during the reporting period concerned labour exploitation, followed by sexual exploitation, and that victims originated from a diverse range of countries.

- Number of victims of THB identified as part of the asylum procedure (disaggregated by sex, age, nationality, form of exploitation).

In 2023, 23 potential victims of THB were identified through the asylum procedure, comprising 11 men and 12 women. The individuals originated from Afghanistan, Iraq, Iran, Morocco, Nigeria, Nicaragua, Somalia, Syria, Türkiye, Ukraine and Venezuela.

In 2024, 7 potential victims of THB were identified through the asylum procedure, comprising 2 men and 5 women. The individuals originated from Malaysia, Nigeria, Russia, Ukraine and Venezuela.

In 2025, 9 potential victims of THB were identified through the asylum procedure, comprising 2 men and 7 women. The individuals originated from Colombia, Ghana, Kosovo, Nigeria, Somalia, and Venezuela.

In 2026, to date, 6 potential victims of THB have been identified through the asylum procedure, comprising 1 man and 5 women. The individuals originated from Colombia, Nigeria, Ukraine and Vietnam.

- Number of victims of THB who received assistance (disaggregated by sex, age, nationality, form of exploitation, internal or transnational trafficking).

Unfortunately, the available data do not provide a complete annual figure for the number of trafficking victims who received financial support from the State, nor do they indicate the total amount of financial assistance received by each victim.

In 2025, 11 requests for assistance were made to municipal social services or the assistance service for foreign nationals in vulnerable circumstances. Six concerned financial support, three housing assistance, and two social-work support. Among those interviewed at Bjarkarhlíð, referrals were made to municipal social services, the assistance service for foreign nationals in vulnerable circumstances, Stígamót (the Centre for Survivors of Sexual Violence), the Women's Shelter, the Icelandic Confederation of Labour (ASÍ), trade unions, sexual-assault support services and healthcare providers.

In 2024, nine cases were referred for financial assistance and four for housing assistance. In a large labour trafficking case, labour-sector organisations were already involved and provided support including advice on labour rights, recovery of unpaid wages, assistance in finding new employment, and support with work permit procedures.

Under the draft National Action Plan against Trafficking in Human Beings 2026-2030, Bjarkarhlíð is expected to begin collecting data on services provided to victims, disaggregated by form of exploitation, gender, age and nationality.

- Number of child victims of THB who were appointed legal guardians.

Unfortunately, statistics of this kind are not available.

- Number of victims of THB granted a recovery and reflection period (disaggregated by sex, age, nationality, form of exploitation).

In 2024, 3 potential victims of THB were granted a recovery and reflection period, comprising 2 men and 1 woman. The individuals originated from China and Zambia.

In 2025, 7 potential victims of THB were granted a recovery and reflection period. All were women originating from Vietnam and Ghana.

In 2026, to date, 2 potential victims of THB have been granted a recovery and reflection period. Both were women originating from Vietnam and Venezuela.

- Number of victims of THB granted a residence permit, with an indication of the type of the permit (for the purpose of co-operation in the investigation/proceedings, on personal grounds, other) and its duration (disaggregated by sex, age, nationality, form of exploitation).

Unfortunately, statistics of this kind are not available.

- Number of persons given refugee status or subsidiary/complementary protection on the grounds of being victims of THB (disaggregated by sex, age, nationality, form of exploitation).

Unfortunately, statistics of this kind are not available.

- Number of victims of THB who claimed compensation, who were granted compensation and who effectively received compensation (disaggregated by sex, age, nationality, form of exploitation, with an indication of whether the compensation was provided by the perpetrator or the State, and the amount awarded).

Unfortunately, the courts' case registry does not provide statistics of this kind.

However, applications relating to 41 wage claims in the bankruptcy estate of the defendant in the so-called "Vietnam Case", a major labour trafficking investigation conducted by the Reykjavík Metropolitan Police, have been lodged with the Wage Guarantee Fund. The claims were lodged by lawyers acting on behalf of the employees' trade union. The Fund has no information as to whether the employees concerned were victims of trafficking in human beings. Processing of the claims is ongoing. It is expected that decisions in those bankruptcy estates for which the requisite opinions have been received will be issued before the end of the year, in accordance with the Act on the Wage Guarantee Fund. Among the claimants are 25 men and 16 women, including 33 Vietnamese nationals, six Icelandic nationals and two Polish nationals. The average value of the claims is approximately ISK 19 million.

- Number of victims of THB who received another form of financial support from the State, with the indication of the amount received.

Reference is made to the information provided in response to the third sub-paragraph of this question.

- Number of victims of THB who received free legal aid.

Unfortunately, statistics of this kind are not available.

- Number of victims of THB who were returned or repatriated to/from your country (disaggregated by sex, age, country of destination, form of exploitation).

Unfortunately, statistics of this kind are not available.

- Number of investigations into THB cases (disaggregated by type of exploitation, with an indication of the number of victims concerned).

In 2023, 23 cases were investigated as THB, while a further 46 cases were registered as suspected trafficking.

In 2024, 24 cases were investigated as THB and 171 cases were registered as suspected trafficking.

In 2025, 13 cases were investigated as THB, while 76 cases were registered as suspected trafficking.

Of the total cases, 19 concerned labour exploitation, 17 sexual exploitation, three the exploitation of children, and one forced marriage. In the remaining cases, the nature of the suspected exploitation was unclear.

- Number of prosecutions in THB cases (disaggregated by type of exploitation, with an indication of the number of victims and defendants concerned).

One prosecution was initiated concerning the alleged labour exploitation of four minor victims by one defendant. The case resulted in an acquittal.8

- Number of convicted perpetrators of THB (disaggregated by sex, age, nationality, form of exploitation).

None.

- Number of convictions for THB, with an indication of the form of exploitation, whether the victim was adult or child, the type and duration of the penalties, and whether they were effectively enforced or suspended.

None.

- Number of judgments in THB cases resulting in the confiscation of assets.

[8] Judgment of the Landsréttur Appeal Court, 17 February 2023 in case no. 324/2022.

None.

- Number of convictions of legal entities for THB.

None.