

G R E T A

Group of Experts on Action
against Trafficking in Human
Beings

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Reply from Denmark to the Questionnaire for the evaluation of the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings

Fourth evaluation round

Thematic focus: Addressing vulnerabilities to trafficking in human beings

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Reply from Denmark 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 Round of Evaluation

Part 1 – 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 trafficking in human beings (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?

Identified categories of people at risk of trafficking in Denmark

Based on experiences from trafficking interviews with potential victims and being contact persons for victims of THB and following the general trafficking trends and developments in Denmark, the Danish Centre against Human Trafficking has gathered knowledge on vulnerabilities.

For instance, undocumented migrants are considered a vulnerable group. Other vulnerabilities include having debt, being breadwinner of the family in the home country, mentally unstable, drug addiction, poverty/financial unstable situation in the home country, lack of information on rights in Denmark etc.

There are victims identified in all parts of the country and in many sectors. Persons who are exploited into prostitution make up the majority in the statistics most years (except for 2018, which is before this reporting period, where forced labor was the most prevalent form of exploitation due to a large case of exploitation in the transport sector). Nigerian and Thai women make up the majority of women who are exploited into prostitution.

Foreign (and often low-skilled) workers are considered a group of concern for instance in the green sector, restaurant/service, cleaning, transport and the building- and construction sector.

Children who might be victims of THB are considered vulnerable. The Danish Centre against Human Trafficking has continued focus on for instance North African minors who are exploited by gangs over the last years. In addition, Serbian young women and girls who are exploited into marriage are present in the statistics. There has also been a prevalence of cases regarding Vietnamese citizens exploited into production of cannabis.

To discuss trends and risk groups, the Danish Centre against Human Trafficking hosts biannual meetings with the NGOs who receive funding under the national action plan. The Centre also facilitates discussions with researchers at annual research network meetings, where all relevant researchers on human trafficking and practitioners are invited. Further, the Centre shares knowledge with relevant authorities about trends and forms of exploitation.

Specific initiatives targeting certain groups to identify possible victims of THB

The current national action plan addresses the identified groups in risk of being trafficked in Denmark. See also the response for Q41, which unfolds the different focus areas in the current national action plan.

Outreach efforts by NGO's in the field of prostitution

The outreach efforts by the NGO's contribute to prevent human trafficking in sexual exploitation and to establish contact with potential victims of human trafficking with a view to ensure that they receive the right help. Furthermore, one of the NGO's that receive funds under the action plan is specialized in outreach activities toward young men and boys from North Africa who are in risk of trafficking.

Strong cooperation between relevant authorities in terms of labor exploitation

Authorities such as the Danish Police, the Danish Tax Agency, the Danish Working Environment Authority, and the Danish Agency for Labor Market and Recruitment are typically the first to establish contact with potential victims through their regular monitoring activities. The Tax Agency carries out, among other things, control visits and subsequent tax and duty checks, particularly with a focus on suspected traffickers and others, who benefit financially from the exploitation of people and/or forced labour.

Furthermore, the Ministry of Employment has a focus on vulnerable foreign workers in Denmark in relation to fighting social dumping and general labor exploitation. The Danish Working Environment Authority is aware of risks factors of THB and forced labor and regularly host seminars where THB is on the agenda in their inspection centres to spread knowledge and awareness for the inspectors in their oversight and inspection activities.

In this way, these efforts aim to intervene against the entire spectrum, from vulnerable foreign workers, who have been exploited to work under unreasonable conditions, to actual victims of human trafficking. A strengthened effort against gross exploitation of vulnerable foreign workers will also be able to help prevent human trafficking.

The Danish Centre against Human Trafficking has as a pilot project made small cards with a QR-code that links to the Danish Centre against Human Trafficking-website for authorities, NGOs, and labor unions. These are handed out to vulnerable workers. The website has been visited 5300 times since November 2023.

The Authority Group for Combatting Trafficking

The CMM is in charge of an authority group to combat trafficking with participants from the Danish Food Administration, the Agency for International Recruitment and Integration, the Police, the Danish Prosecution Service, the Immigration Service, the Danish Tax Agency, the Danish Working Environment Authority and the Danish Financial Intelligence Unit.

In the authority group for combating trafficking, the meetings in 2023 have among other things focused on financial aspects of anti-trafficking efforts with the inclusion of the Financial Intelligence Unit in the group. The group have discussed implementation of the information card with the QR-code (mentioned above) targeted vulnerable migrant workers – including also feedback on the text for the website, the selected languages and so on. Further, the group of authorities have joined together in specific cases with suspicion of trafficking to plan and execute joint control visits at workplaces.

In addition, the NGO's are from January 2024 invited to participate in an annual meeting with the authority group for combating trafficking.

General knowledge sharing

CMM is responsible for collecting and disseminating knowledge and statistics. In addition, CMM provides information on human trafficking to both relevant actors and the wider public. This is handled, for example, through educational activities, the annual conference, reports and CMM's website.

CMM runs a national hotline and an online reporting tool, the wider public, companies, relevant authorities etc. can use if they suspect trafficking.

CMM has developed guidelines for companies and employers on how to avoid using forced labor. In May 2024, CMM also launched a publication with tools for authorities and other actors to detect human trafficking. The

publication presents both general and sector-specific indicators of human trafficking and is thus intended to give an insight into how actors can concretely use indicators in the work of tracking down and identifying persons exposed to human trafficking.

Combatting THB online

CMM finds that technology to a greater extent is used to exploit persons for human trafficking. At the same time, there is a potential to use technology to combat human trafficking. Therefore, the Danish Centre against Human Trafficking is behind an initiative called technology-facilitated trafficking with the following purposes and goals:

- To create awareness on technology facilitated trafficking
- To gain more knowledge about the phenomenon
- To facilitate collaboration and cooperation between private actors and authorities
- To develop new methods to identify victims of trafficking who are recruited, exploited or surveilled by the use of technology and hamper traffickers who misuse technology

The CMM considers technology as an important tool in the development of methods.

As part of this initiative, the CMM facilitates a network consisting of private companies and authorities. PwC, META (formerly known as Facebook), MobilePay, Microsoft, the Tax Department, the Cyber Crime Police in Denmark, and the Danish Financial Investigation Unit are all part of the network. The Danish Agency for Digitalization and WHO are also part of the network as observers.

Response to the war in Ukraine and increased risk of human trafficking in migration flows

The inter-ministerial working group lead by the Ministry of Gender Equality (explained in depth in response to Q41) meets on an ad hoc basis and when certain situations occur. At the outbreak of the war in Ukraine, the working group held a meeting in the spring of 2022 in order to secure a coordinated response to the increased risk of trafficking with flows of displaced persons from Ukraine.

Furthermore, the Danish Centre against Human Trafficking continues to have a special attention towards preventing Ukrainians from being trafficked. The Danish Centre against Human Trafficking has made several awareness raising activities to prevent trafficking, including flyers for Ukrainians who arrived to Denmark – in Ukrainian, English and Russian. These have been developed in consultation with two victims from Ukraine. A guide has also been made for professionals who come into contact with displaced persons from Ukraine. Meetings have been held with a range of actors both from the Council of Baltic Sea States, the EU and nationally to discuss the risk of trafficking among displaced persons from Ukraine. In addition, the CMM has produced a flyer with a QR-code targeted vulnerable

foreign workers. The flyer is distributed to the workers by the Danish Working Environment Authority, the Tax Department and other relevant actors who take part in control visits at work places. The QR-code links to the CMM-website, with information in eight languages, including Russian and Ukrainian.

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);

In May 2021, a broad majority of the former Danish parliament made the political agreement "Children First". One of the key initiatives of the agreement was the introduction of a new Child's Act that should collect all regulation concerning social support for children, young persons, and their families. The Child's Act entered into force 1 January 2024.

In the Child's Act, some new requirements for the municipalities to prevent negative social control were introduced. Hence, all municipalities shall prepare a contingency plan for the prevention, detection and handling of negative social control, honor-related conflicts and extremism among children, young persons and their families. The contingency plan shall be formulated in writing, adopted by the municipal council and released for publication. The municipal council shall revise the contingency plan as and when needed, but at intervals of not more than four years. Furthermore, the municipalities have to make a risk assessment before the parents are being involved the investigation of a case where the initial assessment has shown a possible instance of honour-related conflicts or negative social control. Also, there has been introduced new measures of risk assessment when investigating notification of concern for a child or a young person, and it has been clarified that support for young persons between 18 and 22 years also can be reasoned in negative social control or an honour-related conflict.

Additionally, the rule about age dispensation in the Marriage Act was repealed from the 1st of February 2017 making the age limit of 18 years to enter into marriage absolute. At the same time rules about recognition of foreign marriages entered into force so that marriages contracted with one or both parties being minor at the time of the wedding are as a main rule not recognized in Denmark.

Moreover, Denmark has acceded to the Hague Convention of 29 May 1993 on the Protection of Children and Cooperation in International Adoptions and the Europe Council Convention on Adoption of 28 November 2008. Thus, the Danish adoption legislation complies with the obligations arising from these conventions. In addition, a new adoption system came into force in Denmark in 2016, where stricter supervision was introduced in order to

counter illicit practices and ensuring that adoptions to Denmark are in the best interest of the child and on a legally and ethically sound basis.

Furthermore, the South Jutland police district has since May 2022 been tasked with the management of the nationally coordinated monitoring effort in regards to trafficking in human beings. The national monitoring is carried out based on the police efforts in all of the Danish police districts as well as on knowledge, modus, intelligence, etc. from Denmark and abroad, including primarily from Europol and from external partners such as the Danish Centre against Human Trafficking (CMM).

The Danish National Police refers to the Danish national guidance on the police's handling of cases regarding human trafficking. It is stated in the national guidance that if the police suspect human trafficking involving children, the police should, the circumstances taken into consideration, contact the following authorities:

- The Danish Centre against Human trafficking
 - The Social Authorities
 - Red Cross
 - Vagten for Uledsagede Mindreårige
- b. developing children's life skills (including media literacy and online safety skills), knowledge and participation;

In the Child's Act, it is a key principle that the municipality shall support the active participation of the child or young person in the case management process on an equal footing with their parents. The child's or young person's participation shall be arranged with due respect for the diversity of children and young persons, taking into account factors such as the maturity and resources of the individual child or young person, including any physical or mental impairment of the child or young person.

Furthermore, as part of different political agreements including the annual Finance Act, a range of non-governmental organisations that work with the development of children's life skills, knowledge and participation receive financial support. Among others, these include Save the Children Denmark that for instance does counselling for victims of online sexual abuse and Children's Welfare, (Børns Vilkår) who runs the Danish Child Helpline.

In cases regarding unaccompanied minors, the Danish National Police can contact the phone hotline of the Danish Immigration Service. The phone is used only for cases regarding unaccompanied minors and is open Monday to Friday from 9 a.m. to 3 p.m. The team also has a direct e-mail that the Danish National Police can use if they encounter cases with minors.

The purpose of the phone hotline and the direct e-mail is to ensure that unaccompanied minors who are in contact with Danish authorities will be appointed a personal representative swiftly. The Danish Immigration Service is responsible for requesting a personal representative through the Red Cross and The Agency of Family Law. This process is the same regardless of whether an unaccompanied minor applies for asylum or not.

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

According to the § 135 of the Child's Act, any person who learns that a child or young person under 18 years of age is being exposed to neglect or degrading treatment, including violence, by their parents or other caregivers or is living under conditions endangering their health or development has a duty to notify the municipality thereof. Hence, this duty applies to all adults in Denmark.

Furthermore, according to § 133 of the Child's Act, there is a special duty of notification for persons performing public functions or holding public offices who shall notify the municipal council if, in the exercise of their duties, they learn or have grounds to assume that:

- i. a child or young person under 18 years of age may need special support;
- ii. child may need special support immediately after being born because of the circumstances of the expecting parents;
- iii. a child or young person under 18 years of age may need special support due to the child's or young person's unlawful absence from school or failure to meet the compulsory education requirement; or
- iv. a child or young person under 18 years of age has been exposed to abuse.

Under the Child's Act, the municipal council shall ensure a timely and systematic assessment of all notifications to determine whether the child or young person needs special support. The municipal council shall perform a central registration of the notifications in order to support the planning of potential measures to help and support the child.

In addition, within 24 hours of receiving a notification, the municipal council shall assess whether the health or development of the child or young person is at risk, and whether there is a need for implementing immediate measures targeted at the child or young person. The municipality council shall in all cases react and assess what measures should be taken based on receiving a notification, including an assessment on the requirement to further examine the needs of the child and carry out measures to help and support the child.

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

Social Education (Pedagogue): It is stated in the executive order on the Social Education (pedagogue) programme that all students must know relevant international conventions, including the Convention on the Rights of the Child. THB is not explicitly mentioned in the executive order; however, it might be relevant in this respect that the executive order dictates, among other things, that students in Social Education must know risk factors and signs of children's lack of social-emotional well-being. Similarly, students must be capable of identifying and responding to children in social or educational settings who display signs of distress, and they should engage in professional conversations with children, adults and authorities.

Teacher Education: While the current executive order on Teacher Education does not explicitly mention measures to address children's vulnerability to THB, it is imperative to emphasize that certain subjects within the Teacher Education curriculum, notably Pedagogy and General Didactics, as well as Philosophy of Life, include areas of content where students are expected to develop an understanding of human rights and the UN Convention on the Rights of the Child.

Legal guardianship (providing training to legal guardians): With regard to legal guardians no public courses or training is offered.

However, the Agency of Family Law guides the legal guardians in connection with the initiation of the guardianship and if any doubts arise during the guardianship.

It should also be noted that the guardian often is a close relative to the person under guardianship.

If it is not possible to find a suitable guardian in the family, the Agency of Family Law has a group of guardians (called permanent guardians) that can be appointed. A permanent guardian is a professional guardian who typically acts as guardian for several people.

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

Discrimination based on nationality or belonging to various minorities is prohibited by the Health Act, general non-discrimination laws and public law principles.

Migrant children who are registered as resident in the civil registration system (CPR) or socially secured in Denmark under relevant EU law have full access to the health system. Migrant children who are under the care of the immigration services have access to necessary healthcare. Regardless of civil registration status etc., all children have access to acute hospital care free of charge.

Children of migrant workers who are registered as resident in the civil registration system (CPR) or socially secured in Denmark under relevant EU law have full access to the health care system. Regardless of civil registration status etc., all children have access to acute hospital care free of charge.

All migrant children of mandatory school age who are under the provision of the Danish Immigration Service have access to primary and lower secondary education equivalent to the education available to bilingual children residing legally in Denmark. Teenage migrants above mandatory school age who are under the provision of the Danish Immigration Service have access to upper secondary education provided they possess the required academic qualifications.

Unaccompanied minors who are under the provision of the Danish Immigration Service (the DIS) are accommodated in specialized asylum centres for unaccompanied minors. The centres provide a safe and protective environment and are staffed 24 hours a day by professional staff members who are trained to cater to the specific needs of unaccompanied minors.

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

The Ministry of Urban, Rural and Ecclesiastical Affairs is the jurisdictional authority for the birth registration of all children born in Denmark. Today, birth is registered in the digital church book in almost every case on the basis of a notification from the midwife who was present at the birth. Only in few cases where birth took place without the presence of a midwife, the parents themselves are responsible for notifying the birth.

The notification from the midwife is automatically sent to the parish where the mother lives or to the municipality of the Southern part of Jutland if the mother lives in that part of Denmark at the time of birth. If the mother does not live in Denmark, the midwife sends the notification to the parish or to the municipality of the Southern part of Jutland where birth has taken place.

The registrar in the local parish (or the municipality of the Southern part of Jutland) completes the registration of the birth in the digital church book. If the parents are married at the time of birth, the father (or, from the Fall of 2024, - the co-mother) will automatically be registered as father or co-mother. If the parents are unmarried, the registration of the other parent will be completed on the basis of a Care and responsibility for paternity declaration co-signed by the father (or, from the Fall of 2024, by the co-mother).

The birth registration itself is processed on the basis of the following rules:

- Lov om anmeldelse af fødsler og dødsfald and Bekendtgørelse om anmeldelse af fødsler.

Registration of the paternity and co-motherhood is processed on the basis of the following rules:

- Børneloven supplied by changes in: Lov om ændring af børneloven og forskellige andre love og Bekendtgørelse om registrering af faderskab og medmoderskab.

In cases where the mother does not have a Danish CPR-number, the parish/the municipality in the Southern part of Jutland creates an administrative CPR-number for the mother in order to register the birth of the child. Before creating the CPR-number the mother must present genuine ID-documentation such as passport or national ID-card to document proper identity.

The same process applies in situations where the father or co-mother who does not have a Danish CPR-number delivers a Care and responsibility for paternity declaration and needs to have an administrative CPR-number in order to register their paternity or co-motherhood.

Administrative CPR-numbers are created on the basis of the following rules:

- CPR-loven and Bekendtgørelse om folkeregistrering m.v.

After the birth registration the parents can achieve a Certificate of Personal Data (to certify birth). The certificate can either be requested digitally by the use of a self-service or by personal attendance at the registrar in the parish.

As such, Denmark has a very secure and throughout digital process for birth registration and parenting registration.

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

As described in response to Q1 and Q41, there are different initiatives in the Danish anti-trafficking effort that targets different types of groups and forms of exploitation. There are initiatives targeting predominantly female-oriented types of exploitation in prostitution and predominantly male-oriented types of exploitation in relation to labor exploitation and exploitation to criminal activities.

The Danish Centre against Human Trafficking considers gender related issues in each case individually. E.g. if the person requests a female interviewer for the initial identification interview or requests a female doctor when health service is offered.

There is also an attention to gender related vulnerabilities, when victims of human trafficking are accommodated. The national action plan to combat human trafficking funds a specialized shelter (crisis center) for female victims of human trafficking operated by the NGO the Nest International. The shelter accommodates eight female victims. In addition to this, victims can be accommodated in shelters specialized for men and women in crisis.

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;
- b. information, awareness-raising and education campaigns;
- c. socio-economic initiatives targeting underlying and structural causes;
- d. education, vocational training and job placement programmes.

Furthermore, the measures outlined in the report from the Working Groups on Vulnerable Foreign Workers and Combating Human Trafficking, include several initiatives aimed at reducing the vulnerability to trafficking among disadvantaged minorities.

These initiatives include a housing inspection, an intensified effort against illegal labour, and the National Working Environment Authority's action against bogus self-employment.

Victims of THB who are under the provision of the Danish Immigration Service have access to educational activities and vocational training while they are under the provision of the Danish Immigration Service.

The employment system has very limited contact with persons in risk of trafficking or persons who have already been victims for trafficking. In general, these groups do not register as jobseekers at their job centre. Part of the reason might be that legal residency in Denmark is a prerequisite for taking part in active employment measures or being eligible for social assistance.

On basis of this, no specific national measures have been introduced to reduce vulnerability to trafficking of persons from disadvantaged minorities in relation to education, vocational training and job placement programs.

In the Danish set-up, the 94 individual, municipal job centres are responsible for the provision of the active labour market policy. The municipalities may therefor set up projects or activities specifically to reduce different risks of disadvantaged minorities if they see a certain need. These projects may deal with various risks such as substance abuse, homelessness, criminality or trafficking.

Furthermore, a number of the ordinary employment measures aim to empower vulnerable groups and give them the ability to integrate and participate on the Danish labour market and in the society as such.

For instance, jobseekers under 30 years old without an education must undergo reading, writing, and math tests. The test determines whether the job-seeker is ready to pursue an education or need to improve his or hers reading, writing, and math skills before starting an education.

If a jobseeker needs basic skills, the municipality is obliged to ensure that the jobseeker receive education corresponding to the level of the primary school leaving exam in Danish and mathematics.

Furthermore, different initiatives are being launched to improve the digital skills of unemployed persons.

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;
- b. monitoring institutions and foster families accommodating persons with disabilities;
- c. procedure for the selection and appointment of legal guardians and monitoring of their work;
- d. access to adequate accommodation, education and work;
- e. access to information and reporting/complaints mechanisms which are accessible to persons with disabilities.

Support and services for persons with disabilities are, as a rule, given in their own home. This can, for example, be in the form of economic compensation to reimburse necessary extra costs caused by a disability or in the form of personal assistance in the home. Parents maintaining a child under 18 with a disability in the home can also receive compensation for loss of earnings.

The Social Supervisory Authority (Socialtilsynet) ensures that social facilities, for example institutions and foster families accommodating persons with disabilities, are of high-quality standards, and thus making it safe for municipalities to place children, youths and adults in their care.

The municipality shall provide assistance towards the cost of adapting the homes of persons with disabilities where such adaptations are required to make the home better suited to accommodate the resident.

In Denmark the principle of sector accountability applies to all actors across the public sector. This implies that all authorities in the public sector are responsible for ensuring that any service they provide, is accessible to persons with disabilities. This also applies to the provision of information, as well as to reporting and complaint mechanisms.

A person may request guardianship or may request changes to or the ending of guardianship. The following persons may apply for another person to be placed under guardianship:

- The person's spouse, children, parents, siblings or other close relatives.

- The guardian or a special guardian.
- The local authority or the chief of police.

To be a guardian, you must be over 18 years old. Often the guardian is a close relative. If it is not possible to find a suitable guardian in the family, the Agency of Family Law has a group of guardians (called permanent guardians) that can be appointed.

A permanent guardian is a professional guardian who typically acts as guardian for several people.

The purpose of a guardianship is not only to ensure the care of the person under guardianship, but also to ensure public supervision of the guardian's performance of the tasks.

Guardians are supervised by the Agency of Family Law. Upon request, the guardian shall provide the information necessary for the supervision. If the Agency of Family Law, through an inquiry or by other means, becomes aware of circumstances that may be assumed to be contrary to the interests of the person under guardianship, the Agency must initiate an investigation of the circumstances. Furthermore, the Agency of Family Law can apply sanctions against the guardian such as ordering the guardian to submit information necessary for the investigation or deprive the guardian of the guardianship.

The Agency of Family Law must approve a number of the legal guardian's financial dispositions on behalf of the person under guardianship such as the acquisition or the sale of real estate, gifts, incur debt and other unusual dispositions.

A guardian can be removed if the guardian abuses the guardian's position or otherwise proves unsuitable for the position, or if it is necessary for the sake of the person under guardianship.

It should be noted that not all complaints lead to the guardian being removed from the position of legal guardian. The Agency of Family Law assesses whether the circumstances are so serious that the guardian should be deprived of the guardianship or not.

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 rele-

vant organisations;

- b. access to legal assistance and representation; access to decent accommodation, health (including psychological) care, work and education.

Identification of vulnerabilities

All operators of reception and accommodation for asylum seekers and other aliens under the provision of the Danish Immigration Service are obligated to identify vulnerable persons, including victims of trafficking. Foreign nationals who are under the provision of the Danish Immigration Service are offered an initial medical interview at the reception center immediately upon arrival. This allows healthcare personnel to assess the need for a referral to a medical specialist or psychologist or other necessary treatment. The operator must ensure holistic, interdisciplinary and coordinated psychosocial efforts towards these residents.

All asylum caseworkers at the Danish Immigration Service must partake in a three-day interview course. The focus of the course is on interviewing asylum seekers, including how to interview persons who are vulnerable and have undergone traumatic events in their country of origin or en route to the host country. Caseworkers are trained in creating a safe space for applicants to share their stories freely.

Furthermore, the caseworkers are trained in asking questions regarding the applicant's health during the asylum interview. This is to ensure that any special needs that the applicant may have is identified by the caseworker. If the applicant is an unaccompanied minor, he/she will have a personal representative appointed, who can assist the minor in obtaining the proper healthcare.

All asylum caseworkers are trained in detecting indicators of human trafficking when they conduct interviews with asylum seekers. They participate in information meetings on human trafficking and on what indicators they should be aware of. Furthermore, the Danish Immigration Service has a designated team handling cases of human trafficking among asylum seekers – both adults and children.

The caseworkers in this team ensure an attentiveness to details during an asylum interview that could relate to human trafficking by continuously informing every caseworker in the Asylum Division about the process of identification of victims of human trafficking.

When indicators of human trafficking are observed, the applicant is asked to sign a consent form, allowing the DIS to contact the Danish Center against Human Trafficking (CMM) on behalf of the applicant. The applicant is informed that their information will be sent to CMM, and that CMM will conduct an interview to cover all aspects related to the trafficking.

When CMM has made an assessment, based upon their interview with a potential victim, the DIS will receive CMM's assessment. The Danish Immigration Service then will make the final assessment on whether to identify the person as a victim of human trafficking. The identification enables the victim to receive support and assistance during a reflection period of a maximum of 120 days for victims with illegal stay.

Due to the high level of vulnerability, the Danish Immigration Service always aim to identify possible victims of human trafficking as soon as possible. This is to ensure that the person will have access to sufficient assistance early in the process.

In very few cases, the DIS can make its decision without an assessment from CMM, e.g. if the applicant does not wish to talk to CMM. In such cases, the decision will be based on the information the applicant has provided during their asylum interview with the DIS.

Access to information

All asylum seekers are invited to participate in an information meeting. At the meeting, all participants will have an interpreter present. The DIS will explain the asylum procedure and the focus of the asylum interviews. The applicants will also be informed of the right to housing, meals, healthcare and education. They will also be informed on how to get in contact with relevant NGO's.

Furthermore, The Danish Refugee Council (an NGO) also hosts information meetings on the asylum procedure and the rights of the applicants.

For persons travelling from Ukraine, information folders regarding human trafficking are distributed. This is because Ukrainian nationals, for the most part, are not called for an interview with the Danish Immigration Service.

Access to accommodation, health care, work and education

Victims of trafficking who are under the provision of the Danish Immigration Service have access to accommodation in asylum centers or other appropriate forms of accommodation, e.g. shelters or safe houses based on an assessment of their individual needs.

Additionally, they receive cash allowances and/or free meals and have access to extended health care services, necessary social measures as well as educational activities and vocational training while they are under the provision of the Danish Immigration Service.

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:

- 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;
- b. provision of clear employment contracts;
 - c. access to decent work and housing, health care, social services and education;
 - d. possibility to change employers;
 - e. access to confidential complaints mechanisms;
 - f. right to join trade unions and to engage in collective bargaining;
 - g. legal avenues for regularising their stay in the country.

Through the Danish Working Environment agreement of March 30, 2023, the government has committed to strengthen the efforts against social dumping, work-related crime, and illegal labor allocating DKK 36 million from 2023 to 2026.

Among others, the following initiatives are being implemented:

- Strengthening corporation between authorities with a cross-agency task force to ensure that the authority effort between the National Working Environment Authority, the Tax Authority, and the police focuses more on severe and complicated cases. The cross-agency task force will enhance cooperation to identify new control- and inspection targets across the country, systematically coordinate and follow up on joint inspection actions, and utilize knowledge about the development of labor market crime, social dumping, and the use of illegal labor. (ongoing)
- Developing a national strategy and action plan for Denmark's efforts against social dumping and labor market crime. (expected in 2025)
- An analysis of social dumping and labor market crime in Denmark has been initiated. (ongoing, expected in autumn 2024)

The Danish Agency for International Recruitment and Integration (SIRI) runs an [online portal](#) where foreign nationals who wish to visit, live or work in Denmark can find information on Danish immigration laws and conditions for being granted a residence and/or work permit in Denmark. The site describes the different labour schemes and the conditions to be fulfilled. Information is provided in English and Danish.

It is a condition for being granted a work permit in Denmark that the offered salary and terms of employment of the contract of the migrant worker corresponds to Danish standards.

Migrant workers have the possibility to change employer while working in Denmark, if the new contract complies with the conditions in one of the labour schemes. He/she must submit a new application for a residence and work permit with information on the new employment. When an application

has been submitted, the migrant worker can start working while the application is processed.

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?

Yes, since 2012, funds have been set aside for a joint effort by the authorities for orderly conditions on the labor market (social dumping) in order to ensure that work in Denmark takes place under proper conditions and according to Danish law.

The Danish Working Environment Authority (DWEA) carry out inspections in all relevant sectors, e.g. construction, agriculture, green houses, and HORECA. DWEA has a focus on trafficking of human beings (THB) during inspections in the effort against social dumping where relevant. DWEA emphasizes inspections in high-risk sectors, and have a comprehensive mandate to carry out inspections on a regular basis.

Yes, DWEA co-operates with both other authorities and the social partners. As part of the effort against social dumping and illegal work the Tax agency, the police and DWEA carry out inspections together approximately 50 times (full days) a year and have regularly meetings. The authorities also meet on a regular basis with the social partners, and DWEA receives tips about possible offences from the trade unions.

Yes, there is a separation between the two authorities, as they are under two different ministries and regulations.

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?

The operation of recruitment agencies are regulated in The Act on the Legal Status of Temporaries When Employed by a Temporary Employment Agency, etc. ([Lov nr. 595 af 12/06/2013](#): Lov om vikarers retsstilling ved udsendelse af et vikarbureau m.v.)

Violation of the regulation may lead to a fine and compensation for the worker/jobseeker. For temporary workers covered by a collective agreement cases of violation of rights under such an agreement, including compensation, which are not resolved through labour dispute resolution, may be decided by the civil courts.

The act on temporaries covers terms of employment and working conditions but does not deal with the recruitment process.

Advisements, selection etc. are subject to the Act on Prohibition of Discrimination in the Labour Market ([Lov om forbud mod forskelsbehandling på arbejdsmarkedet m.v.](#)).

No, recruitment agencies are allowed to charge a fee from jobseekers. The act however prohibits recruitment agencies from demanding payment from employees as consideration for arranging for an employee to obtain permanent employment after having been assigned as a temporary worker to a company.

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?

The Danish Working Environment Authority (DWEA) is the Danish authority responsible for occupational health and safety and inspects working environment conditions in Denmark.

DWEA also inspects whether foreign companies have notified their service to the Register of Foreign Service Providers (RUT) and that the notification is accurate and complete.

DWEA is authorized to control and prevent a posted worker for being abused through legal constructions such as “false” self-employment, letter-box companies and more. For example, DWEA has the authority to investigate whether the conditions for posting are met, including whether the company is actually established in the home country, or whether it is a letter-box company instead. It depends on the circumstances of the case at hand.

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 Danish national efforts to combat human trafficking have since 2002 been anchored in inter-ministerial action plans, as the efforts involve several authorities and actors.

It is noted that Denmark is obligated by a number of international conventions to combat human trafficking. The central obligations are found in the UN's Palermo Protocol and the Council of Europe Convention on Action against Trafficking in Human Beings.

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?

In general, the Danish anti-trafficking effort puts great emphasis on different preventive measures to discourage demand that leads to trafficking in human beings. The different focus areas for the current national action plan (unfolded in Q1 and Q41) help to prevent and discourage demand that leads to different groups of victims being trafficked. This means that in the general work to identify and help vulnerable foreign workers and foreign women in prostitution there is a special focus on indicators of trafficking.

On the Danish Centre against Human Trafficking's website, there is a range of information material, guidelines, and publications available in Danish. Some of the material is also available in English. On the website there is also published information material targeted victims of human trafficking into forced labor translated into 8 languages.

The Danish Centre against Human Trafficking is responsible for training and education of relevant actors – both governmental and other organizations. The purpose is among other things to distribute and harmonize knowledge of human trafficking and to strengthen the understanding of risk groups, indicators, and forms of exploitation. The aim is to make sure that relevant actors know of trafficking as a phenomenon, can recognize signs of human trafficking, and to implement national procedures in terms of referral of potential victims to the Danish Centre against Human Trafficking for further assessment. See also the response to Q4b regarding awareness raising activities.

Please see Q41 regarding the adoption of a new provision in the Danish Criminal Code in May 2022, which independently criminalizes the exploitation of other person's substantial financial or personal problems, lack of insight, rashness or an existing co-dependency to work under obviously unreasonable conditions (section 262 b).

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?

It is an integrated part of the Danish border control to conduct general profiling of the travelers in order to e.g. intercept signals that could suggest, that the traveler in question is a victim of human trafficking or in any other way is in need of protection.

The Danish National Police produces ad-hoc risk profiles, e.g. on trafficking in human beings (incl. minors) and topic specific risk analysis, e.g. on the sea border and on human smuggling. All risk profiles and risk analysis products are made available to all employees of the Danish police via the police's

intranet (POLINTRA) and are also forwarded by e-mail to a network of CIRAM risk analysts in the police districts. Furthermore, relevant products are distributed by e-mail to other border management authorities and external stakeholders, including the Danish Customs Agency and Defence Command Denmark. At the local level, the police districts are responsible for generating and distributing targeted and operational risk analysis products for staff working on the external borders incl. local risk profiles. These risk analysis products are made available on the police's intranet (POLINTRA) and presented during morning parole and briefings.

Furthermore, The Danish National Police has produced national guidelines on the processing of human trafficking, including minors (the latter based on the 'VEGA handbook: Children at airports'), which includes a list of indicators of human trafficking, contact details of relevant authorities and an interview guide for interviewing possible victims of trafficking or perpetrators.

In addition, it is standard practice for the police to notify The Danish Centre against Human Trafficking if the police suspects human trafficking. The Danish Centre against Human Trafficking will then – in relation to the social efforts etc. – assess whether persons with legal residence in Denmark have been exposed to human trafficking.

If the police suspects that an asylum seeker or a foreigner without legal residence is a victim of human trafficking, the police contacts the Danish Immigration Service. The Danish Immigration Service will then carry out a formal assessment of whether the person in question is a victim of human trafficking.

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

Currently none. According to the Sports Confederation of Denmark nothing suggests that THB is taking place in relation to Danish sports. The Sports Confederation of Denmark have not received any warnings, suspicions or anything else from authorities, organizations or others that could lead to the conclusion that THB is taking place in Danish sports at the moment.

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?

The Danish Centre against Human Trafficking has since 2019 hosted an initiative focusing on combatting technology-facilitated trafficking. As part of the initiative, a range of meetings has been held in a network of experts from financial institutions, the cyber police, tax authorities, social media and the

tech industry. The network has discussed how private actors as well as authorities can cooperate to disrupt trafficking facilitated by technology. A leaflet has been produced including indicators – or red flags – of trafficking that are relevant for persons who work with fighting cybercrime or with platforms such as social media, apps and the financial sector.

The Danish Centre against Human Trafficking has also had a pilot project in the fall of 2023 that aimed at scraping sexual services websites with the purpose of improving the outreach work and gathering knowledge. The webscraping project entails a very close cooperation between the Danish Centre against Human Trafficking and the NGO's that work with outreach in the prostitution arena. A range of indicators on trafficking into prostitution (so-called D-Stim) has been developed together with the researchers Dr Xavier L'Hoiry, University of Sheffield, Professor Georgios A. Antonopoulos, Northumbria University, and Dr Alessandro Moretti, University of Copenhagen as part of this cooperation. The indicators are used to sort the scraped data from ads on sexual services websites. The purpose of this project is among other things to develop a tool that makes identification of concerning ads on sexual services websites easier and less time consuming for the NGO's, that work with outreach, and also to ensure that knowledge about the prostitution arena can be gathered.

Furthermore, as stressed by Europol on the media and press side on their [website](#), human trafficking organizations have become increasingly digital, with the internet becoming an important enabler of criminal activities in this area.

This development has been observed in Denmark as well, why most human trafficking cases in Denmark nowadays have at least one type of online component to it. For instance, an increasing use of social media, online platforms as well as encrypted chat applications have been observed used by criminals to recruit victims for sexual exploitation. Furthermore, according to a Danish NGO, women are also recruited on sites like 'Only fans'.

The following measures are examples of mechanisms, which have been developed and implemented in Denmark to prevent the misuse of information and communication technology:

- In light of the continuous high vulnerability of displaced persons from Ukraine, The Danish Centre against Human Trafficking has developed information materials targeted Ukrainian nationals fleeing from the Russian war of aggression against Ukraine. The online as well as physical information material is available in Ukrainian, English and Russian, and first and foremost warns against possible trafficking risks including risks possibly encountered online. These among other things include online and social media ads for job offers that seem too good to be true as well as the so-called 'Loveboy-method' used by criminals to coerce a victim into exploitation (the characteristics of the love-boy technique is specified on EUROPOL's [website](#)).

- The Danish Centre against Human Trafficking has also developed an online leaflet for professionals and other actors, who meet Ukrainian displaced persons, to ensure that they have sufficient knowledge and are equipped to recognize signs and indicators of human trafficking.
- Furthermore, given that the advertisement of sexual services mainly is taking place online nowadays – e.g. on adult services websites – Danish police, as well as several other Danish authorities, who are involved in combatting THB in Denmark, use, or are in the process of developing, different IT-tools to spot adverts for signs/indicators of exploitation/trafficking.
- In 2022, Danish Police launched ‘The Police Online Patrol’. The online patrol unit is designed to strengthen the police’s digital presence so that citizens can engage with a digital police officer online. The online police unit patrols social media and gaming platforms where they can engage in dialogue with children and young people in particular, prevent inappropriate behavior and crime, e.g. exploitation/human trafficking, and intervene if crimes are committed. Citizens can also contact the Police Online Patrol via Messenger, Instagram, Discord and email if they have tips about suspicious behavior online or need advice on how to stay safe online.

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?

As mentioned above (in response to Q15), a leaflet has been produced including indicators – or red flags – of trafficking that are relevant for persons who work with fighting cybercrime or with platforms such as social media, apps and the financial sector just to name a few. The leaflet includes indicators of trafficking separated into three categories: behavioral indicators, financial indicators, and know-your-customer-indicators and recruitment, coercion, and surveillance indicators. It has been made in consultation with the before-mentioned network of private companies and public authorities.

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

The Danish Digital Services Coordinator (the Danish Competition and Consumer Authority) (DSC) does not have any cooperation with ICT (information and communication technology) companies and Internet service providers, including content hosts and social media, in preventing THB (trafficking of human beings). However, the Danish DSC does provide guidance to online intermediary services on the Danish DCS’ [website](#) regarding

the DSA regulation, including regulation regarding illegal content, but no specific guidance regarding the specific area on THB.

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

As part of the analysis that has formed the basis for the current national action plan for 2022-2025, interviews were conducted with a number of organizations that are in direct contact with potential victims and victims of human trafficking. Contributions have also been obtained from the Danish Centre against Human Trafficking, which is in direct contact with victims of human trafficking.

Under the current national action plan, there has been a continued focus on strong, inclusive partnerships on victim identification between The Danish Centre against Human Trafficking and the NGO's that receives funds under the national action plan. For now, the procedure entails an annual meeting with the NGO's working under the action plan to discuss trends, data and facilitate a discussion and knowledge-sharing between the NGO's. The Centre has appointed permanent contact persons responsible for hosting quarterly bilateral meetings with the NGO's. The Danish Centre against Human Trafficking is working on cooperation agreements with each NGO, which aim at enhancing and strengthening the important cooperation and knowledge-sharing. The NGO's are also invited to participate in an annual meeting with the authority group for combating trafficking.

In 2023, the Ministry of Gender Equality has taken the initiative to hold a joint annual NGO meeting which supplements the ministry's ongoing meetings and discussions with the individual NGOs. The first meeting was held in December 2023 and the next annual meeting is expected to be held in the final quarter of 2024. Furthermore, the NGO's will be involved in the preparations for the coming action plan when the current one expires in 2025.

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?

The Danish Centre against Human Trafficking has from 2020 to 2023 registered four transgendered persons who have been officially identified as victims of human trafficking into prostitution.

The Danish Police Complaints Authority has not processed any reports of police misconduct related to victims of THB on the basis of their sexual orientation and/or gender identity.

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?

In cases where the police encounter and arrests irregular migrants who are working and/or staying illegally in Denmark, The Danish Immigration Service will make a decision on whether to expel the person from Denmark.

The Danish Immigration Service will receive both the police report and a detailed interrogation report, whereby the Danish Immigration Service in most cases will have relevant information to identify possible indications of human trafficking. In cases where such indications are present, the DIS will contact The Danish Center against Human Trafficking and present CMM with the information. The Danish Center against Human Trafficking will subsequently make an appointment for an interview with the potential victim and present the Danish Immigration Service with their evaluation. The Danish Immigration Service will make the final assessment on whether to identify the person as a victim of human trafficking. The identification enables the victim to access the rights provided for in the convention.

With regards to cooperation with NGO's, trade unions and employers The Danish Centre against Human Trafficking has a close cooperation on a day-to-day basis with the NGO's working under the national action plan. This includes both cooperation agreements, biannual meetings and ad hoc case specific cooperation. In addition, the NGOs are included in a research network and current projects such as the webscraping project mentioned in Q15.

The Danish Centre against Human Trafficking has published guidelines to employers on how to prevent trafficking in value chains. The guide can be found on the Danish Centre against Human Trafficking website where there is a specific focus on information to companies.

The Danish Centre against Human Trafficking take part in meetings between relevant authorities and both sides of the industry (being the workers unions and the employers' interest groups). The meetings are arranged in three different regions covering the whole country, biannually. The purpose is to shed light on challenges, concerns and share tendencies in relation to works places and specific groups of concern. Outcomes and numbers of joint control visits conducted by the authorities to chosen companies are also shared with the group. The aim of the joint control visits is to check up on

companies' working environments, tax conditions and work/residence permits.

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

The Danish Centre against Human Trafficking supports identified victims and makes sure that they get the necessary protection, care, accommodation and restitution to recover from a situation of exploitation. The Centre acts as a contact person and supports the victim from identification to a possible assisted voluntary return to the home country.

The Centre also offers victims legal assistance. This is based on an individual assessment of the victims' needs. Examples may include guidance on rights and opportunities, on testifying against backers, on guidelines to seek compensation, access to legal assistance, application for residence, including EU residence and family reunification.

NGO's financed by the national action plan conduct outreach work targeting persons in prostitution. They offer health service and build trust with a goal of creating contact with especially foreign women in prostitution and thus contributing to encourage potential victims of human trafficking in the prostitution area to report their story to both the NGO's as well as authorities.

The Danish Centre against Human Trafficking helps victims who wants to report a trafficking offense to the police. If the victim does not wish to report the offense to the police, the Danish Centre can report the offense to the police with the victim being anonymous.

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?

As noted in Q6, the Danish Immigration Service train its asylum caseworkers in identifying indicators of human trafficking when interviewing asylum seekers. Caseworkers are trained to identify human trafficking offences in the applicant's country of origin, en route or in Denmark. Caseworkers will, in cases of potential human trafficking, refer the case to a designated team handling cases of human trafficking.

The team handling human trafficking is working closely with the Asylum Division and CMM to ensure that victims are identified quickly. In order to ensure that best practices are met, the DIS, CMM and the Danish Return Agency have quarterly meetings where identification and assessment practices are discussed. In the majority of cases, an applicant will have been

identified as a victim of human trafficking prior to a decision being made in their asylum case.

In order to strengthen efforts at the borders, to identify and refer possible victims to assistance, a continuous effort is made to ensure that officers at the border are well informed in regards to indicators and guidelines for identifying and handling possible victims of trafficking.

This is done e.g. through action cards which include descriptions of how to conduct checks and register possible cases of trafficking, possible indicators and signs of trafficking, and contact information for related authorities involved in the identification of possible victims.

Throughout the year, further material is communicated to the officers in relation to intelligence regarding possible cases, information regarding developments in modus operandi, different types of exploitation and indicators. This information is based on both national and international intelligence obtained through cooperation with other European law enforcement agencies. This also includes special attention paid to THB in connection with different national or European activities such as EMPACT Joint Action Days.

In regards to displaced persons from Ukrainian arriving at the border, information was distributed to the displaced persons in Ukrainian, English, and Russian on trafficking risks and available resources for potential victims at Denmark's borders.

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

In 2020 Immigration Detention Centre Ellebæk published a procedure for the staff on how to act in case of a suspicion of human trafficking. The procedure was introduced to the staff and is accessible online for all staff on The Detention Centres intranet. The procedure states that the management should be notified immediately when an employee suspects a detainee to be a victim of human trafficking, and notify Centre Against Human Trafficking (CMM). Hereafter, a visit from The Danish Centre against Human Trafficking can be arranged in order to clarify any suspicions of human trafficking. Approved staff from CMM has free access to visit detainees during opening hours. In addition, the organization Hope Now can visit detainees under the same conditions as the The Danish Centre against Human Trafficking.

In 2023, a special training session was carried out. All staff in the Detention Centre were trained by The Danish Centre against Human Trafficking. The training focused on the detection of possible victims of human trafficking, staff cooperation with CMM and an introduction to the local procedures in.

Also, since 2023, a social worker has been employed at the Detention Centre in order to strengthen the focus on the procedures and general assessment of detainees upon reception. The social worker is the primary resource to iden-

tify, consult and take action, when possible victims of human trafficking are detected in the Detention Centre.

The social worker conducts interviews with all newly arrived detainees and focusses as a part of this process on identifying possible victims of human trafficking.

In addition, the pedagogical assistants and the health staff at the Detention Centre have a special focus on identifying victims of human trafficking and report to the social worker. It continuously is a priority for the management of the Detention Centre to maintain focus on victims of human trafficking.

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.

All victims of human trafficking have access to individual assistance and support under the Danish national action plan to combat human trafficking.

The Danish municipalities are according to the Act on Social Services obligated to offer temporary accommodation to people who are victims of violence in intimate relations. In addition to the obligations of the municipalities, the Danish State provides funding to a number of projects and NGOs, which offer counselling and support to victims of intimate violence.

Furthermore, the Danish municipalities are according to the Act on Social Services obligated to offer temporary accommodation (shelters) for persons with special problems who have no home or who cannot stay in their own home and who are in need of accommodation and activating support, care and subsequent assistance.

In 2021, the Danish Parliament agreed on a reform to restructure the effort against homelessness, which came into force October 1, 2023. With the reform comes a large investment in building affordable housing combined with rent subsidy in existing public housing. Secondly, the reform includes a rearrangement of the economic incentive structure, by reducing the period in which the municipalities can reimburse their expenses on shelters.

Instead of unlimited reimbursement of municipal expenses on shelters, the state reimburses municipal expenses for the Housing First support methods that the people in homelessness will receive in their own home after their stay in a shelter.

Additionally, the Act on Social Services and the Child's Act contain a number of provisions aimed at giving individuals, including persons with disabilities, better possibilities of managing on their own or at easing their everyday existence and improving the quality of life. These provisions can, for example, be personal assistance, accompaniment, assistive devices, compensation for loss of earnings when maintaining a child under 18 in the home, special day-care facilities, rehabilitation, sheltered employment, among others.

If victims have special needs the Danish Centre against Human Trafficking uses existing assistance and support measures offered in a Danish context in general, including e.g. assistance in the asylum system or assistance provided by municipalities in accordance with the Service Act. Accommodation of victims of human trafficking is always considered with attention to any special needs, amongst others LGBTQI+ persons. If victims of trafficking have children, they can be accommodated in housing suitable for families. Thus, all victims identified are able to receive care.

In Denmark, the municipalities are responsible for the provision of social support to children and young persons under the age of 18 and their families pursuant to the Child's Act. The purpose of the Act is, among other things, to offer counselling, assistance and support to children and young persons and their families so as to prevent social problems. Any person who is lawfully residing in Denmark and who falls within the purpose is entitled to assistance under this Act.

The Child's Act entails a series of supportive measures that range from early preventive supportive measures such as counselling to supportive measures such as practical support in the home, family therapy or treatment of the child or young person etc. When it is assessed to be vital for the health and development of the child or young person, more intervening supportive measures such as placements outside home can be decided upon.

Access to the Danish health care system is not dependent on health status or, e.g., affected by preexisting health conditions. Persons who are registered as resident in the civil registration system (CPR) or socially secured in Denmark under relevant EU law have full access to the health care system. Regardless of civil registration status etc., everyone has access to acute hospital care – and continued hospital care if made necessary by the circumstances. For persons not registered as resident or socially secured in Denmark under relevant EU law, acute hospital care is provided subject to payment as a general rule, although the possibility of waiving the fee is available in some cases.

Regarding child victims of trafficking

The identification of a child as being a victim of human trafficking is similar to the identification process for adults. Therefore, the answer to 1.1 also apply to child victims of human trafficking. The offers and assistance to child victims of human trafficking outlined in the Danish national action plan for combating human trafficking is also similar as for adult victims of human

trafficking. In addition to this, there is a general extended obligation to protect children including unaccompanied minors. The Danish Centre Against Human Trafficking, the Danish Red Cross, the Danish Immigration Service, and municipalities offers a range of help and support. There is a close cooperation between the actors to ensure a holistic child sensitive approach in order to secure the best interest of the child. All unaccompanied minors in Denmark are appointed a guardian. They have wide-ranging responsibilities, from representing children in legal or other administrative proceedings, to ensuring that all decisions concerning children are taken in their best interest, as well as acting as a bridge between the child and other actors in the child protection system. In case of returning a child to the home country, there will be conducted a search of the parents and an assessment of the child's family.

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?

Victims of human trafficking are offered an Assisted Voluntary Return (AVR), which includes reintegration support in accordance with the Danish National Action Plan to Combat Trafficking in Human Beings 2022-2025. Reintegration support is granted by the Danish return Agency (DRA) as either in-kind support or as cash support. Regardless of nationality, legal status and/or country of return, all victims of human trafficking are offered an Assisted Voluntary Return.

The majority of victims returning from Denmark are granted in-kind support, meaning that the reintegration activities are facilitated by local partner organisations in the respective countries of return. Denmark currently has access to a number of local reintegration partners in the European Reintegration Support Organisations (ERSO) network through DRC Danish Refugee Council.

Cash support is only granted to victims of human trafficking, who are returning to countries where the DRA does not have a local partnership agreement.

In cases where victims of human trafficking are granted in-kind support, the DRA has to approve the reintegration activities along with an accompanying budget, before the reintegration activities can be implemented. This is in the attempt to both monitor and contribute to a sustainable and safe reintegration in the country of return.

A reintegration plan should be a reflection of the individual victims of human trafficking's wishes and needs for the future. With the assistance and input of the local partner organisation, the reintegration activities are carefully selected considering what is both sustainable and realistic to carry out in the current context of the given local community. The reintegration plan

and the accompanying budget is created by the individual returnee with assistance from the local partner organisation.

If a victim of human trafficking provides sufficient documentation (e.g. a valid birth certificate) that he or she has the parental obligations of minor children, the victim of human trafficking is further granted a supplementary reintegration support grant. This reintegration grant shall be used exclusively on activities in line with the best interests of the child, e.g. childcare, school fees, afterschool activities etc.

In cases where the reintegration support is granted as cash support, the Danish Centre Against Human Trafficking (CMM) and the DRA counsels and advises the victim on how to best and most sustainably use the grant. The cash-support is paid out in instalments, most commonly over a period of 6 months.

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.

There is no legal basis in the Danish Aliens Act for granting a residence permit to an applicant merely on the basis that they have been identified as a victim of human trafficking.

If an asylum seeker has been a victim of human trafficking in the country of origin, and if their situation falls within the scope of section 7 of the Danish Aliens Act (asylum), then the applicant will be granted a residence permit on the basis of their asylum claim. This could be the case, e.g. if a minor has been sold by its own family to forced marriage or to prostitution, and if the minor cannot seek protection from the authorities in their home country.

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?

Any person employed by or acting on behalf of the public administration body is subject to a duty of confidence in respect of information on e.g. personal information on individuals.

During the court proceedings, the court has several options to protect the victim's identity. E.g., the court may order, according to Section 29 of the Administration of Justice Act, that a court hearing should be held before closed doors if a public hearing will cause somebody to be unnecessarily aggrieved or it will put somebody's safety in danger.

According to Section 30 and 31 of the Administration of Justice Act, the court also has the opportunity to order a ban on reporting or a ban on publi-

cation of the involved parties' identity on the basis of the same considerations as in Section 29.

According to Section 856 of the Administration of Justice Act, the court can decide that the name, occupation, and address of a witness, including the victim, must not be disclosed to the defendant.

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

The Danish media are partly self-regulated. Representatives of Danish media have written ethical guidelines for the press which are enforced by the Danish Press Council.

The ethical guidelines address measures to protect private life in general. The guidelines also address the need for considerations for the victims of crime or accidents and their relatives.

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?

Since January 1, 2020, there have been no cases of Danish diplomats abroad or foreign diplomats in Denmark employing domestic staff under conditions of forced labour or human trafficking adjudicated in Danish courts.

In the reporting period, The Danish Centre against Human Trafficking offered assistance and support to a person working at an embassy in Denmark. The support was given in accordance with the National action plan to combat trafficking in human beings. The person was identified in 2022.

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

The Danish Security and Intelligence Service (PET) is tasked with, among other things, to prevent, investigate and counter threats to the freedom, democracy and security of the Danish society. In doing so, PET closely monitors the development in the threat landscape and implements the necessary security measures. PET cannot in an unclassified manner provide concrete information about its work and the planning of security efforts.

However, in its annual publication of the Assessment of the Terrorist Threat to Denmark from March 2024, the Centre for Terrorist Analysis (CTA) un-

der PET assesses that the threat from militant Islamists abroad may emanate from individuals with or without links to Denmark. They may include individuals or small groups who have travelled to Europe with the purpose of committing terrorist acts inspired or directed by a militant Islamist group. Radicalized individuals and small groups located outside Denmark, mainly in neighbouring countries, may thus pose a terrorist threat to Denmark. The use of refugee and migrant routes has previously been a key element of Islamic State attack planning against targets in Europe, and it is possible that militant Islamists still intend to exploit available routes.

Generally, the area of refugees and migration does not in itself have a direct impact on the terrorist threat to Denmark. However, there may be derived effects on the threat. For example, radicalized individuals may enter Europe and Denmark, and refugees and migrants who are facing difficult life circumstances may be particularly susceptible to radicalization. CTA assesses that a substantial increase in the number of refugees and/or migrants entering Europe and Denmark could affect the authorities' ability to identify individuals posing a potential threat to the West, including Denmark, in due time. Furthermore, a substantial increase in the number of refugees and/or migrants entering Denmark as well as increased attention given to this issue could affect the terrorist threat to Denmark by way of reactions from, for example, right-wing extremists.

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?

Under the Digital Service Act (DSA) article 45 it is possible for the Commission and the European Board for Digital Services to encourage and facilitate the drawing up of voluntary code of conduct at Union level to contribute to the proper application of the DSA, taking into account in particular the specific challenges of tackling different types of illegal content and systemic risks, in accordance with Union law in particular on competition and the protection of personal data. The voluntary code of conducts will mainly be for the purpose of regulating very large online platforms (VLOPs) and very large online search engines (VLOSEs).

There is no code of conduct for providers in relation to DSA article 45 regarding preventing THB.

If there are reasons to assume that certain violations of the Danish Criminal Code, e.g. wrongful disclosure of photographs concerning another's private affairs, including sexual material, under particularly aggravating circumstances, occur from a website, the website can be blocked. The blocking is based on a court order and the blocking shall be proportional.

Further, documents on the internet can be sequestered as part of an investigation in a violation of the law if there are reasons to assume that the document e.g., can serve as proof or should be confiscated

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.

Reference is made to Section 262 b of the Danish Criminal Code as described in Q41.

According to Section 262 a of the Danish Criminal Code, any person who recruits, transports, transfers, harbours or subsequently receives another person who is or has been subjected to duress, deprivation of liberty, threats, wrongful creation, confirmation or exploitation of a mistake, or any other improper procedure to exploit such other person for prostitution, the recording of sexually explicit material such as photographs and movies, sexual entertainment, forced labour, slavery or practices similar to slavery, criminal acts or the removal of organs is punished for human trafficking. In several cases, the courts have emphasized a position of vulnerability and abuse of power in connection with the interpretation of "other improper procedure".

According to Section 262 a (1) of the Danish Criminal Code, a penalty of imprisonment for human trafficking is imposed on any person who recruits, transports, transfers, harbours or subsequently receives another person who is or has been subjected to (i) duress, (ii) deprivation of liberty, (iii) threats, (iv) the wrongful creation, confirmation or exploitation of a mistake or (v) any other improper procedure, with the intent to exploit such other person for prostitution, the taking of pornographic photographs, the recording of pornographic films, pornographic performances, forced labour, slavery, practices similar to slavery, criminal acts or removal of organs.

The assessment of whether "any other improper procedure" has been used is concrete, but it is assumed that actions have been taken contrary to fair conduct. Please, confer to the reply to Q34 for further information.

The Director of Public Prosecutions has examined six cases where the perpetrator was convicted of THB (convictions in 2022 – 2024). In two out of six cases, the courts have found that duress occurred under Section 262 a (1)(v) of the Criminal Code, concerning the use of "any other improper procedure", with the court noting that the defendant exploited the victim's vulnerable position.

In a judgment from 9 February 2024, the court found the defendant guilty of human trafficking, partly due to the use of an underlying threat of violence and a cynical combination of care and authority towards four women who were in a position of vulnerability, as they could not speak Danish and had very limited financial means available.

In a judgment from 10 January 2023, the high court found the defendant guilty of human trafficking. The court noted that the victims had lived in unsanitary and degrading conditions. The victims did not speak Danish and only spoke little English. They resided in a foreign country and had no money, and therefore they were in a vulnerable position.

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

In Danish law, the special vulnerability of the victim can be considered an aggravating factor for the offender's sentence. The guidelines from the Director of Public Prosecutions regarding THB, refer to the Criminal Code Chapter 10 concerning aggravating factors in sentencing and the EU Directive on combating and preventing human trafficking (2011/36/EU), which states that the victim's special vulnerability should be taken into account in sentencing.

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?

According to Danish caselaw, a "vulnerable position" refers to a "situation in which the victim lacks any real or acceptable alternative but to submit to the abuse". The term is interpreted in accordance with article 3 (a) of the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, and article 2 (1 and 2) of The European Parliament and the council of 5 April 2011 on preventing and combating trafficking in human beings Framework Decision, by which exploitation can occur through abuse of power or exploitation of a vulnerable position.

A review of Danish case law shows that the courts, in assessing whether the victim was in a vulnerable position, have taken into account the presence of two or more of the following circumstances:

- The victim does not speak Danish or has limited language skills.

- The victim has little or no education/schooling.
- The victim comes from a socially disadvantaged background.
- The victim has low self-esteem.
- The victim has no or limited financial means.
- The victim has no ties to Denmark.
- The victim is dependent on the perpetrator, possibly due to being in a romantic or otherwise intimate/close relationship.

In cases of human trafficking, one of the biggest challenges is obtaining a testimony from the victim that can substantiate the cases in court and prove that the victim was in a vulnerable position. Testimonies from the presumed victims are often the only or most crucial evidence in the case. Yet, it is often difficult to get the victim to testify because either they fear the perpetrator or because they fear, retaliation if they tell the police what happened. In many cases, victims are also afraid of the Danish authorities for example because they do not have legal residency in Denmark or because they fear being punished.

In Danish criminal law, it is not sufficient to prove the existence of the victim's vulnerable position. It must also be proven that the defendant was aware of the victim's vulnerability and had the intent to exploit it.

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.

The teaching at the Police Academy in Human Trafficking/Trafficking is divided into three dimensions:

1. Managing and counselling vulnerable victims
2. Human rights
3. Human trafficking.

The concept of dealing with a vulnerable victim or abuse of a vulnerable person's position is dealt with in the Police Basic Education. Here, the students become familiar with the psychological factors that a vulnerable victim has been exposed to, as well as the signals that police officers must be aware of in connection with the interrogation. Vulnerable victims are in this situation victims who have undergone traumatic events. In addition, emphasis is placed on compliance with the formal rules in connection with the questioning of vulnerable victims, as well as cooperation with shelters and other stakeholders.

Human rights are divided into two elements: the legal and the social sciences. In law, the teaching is based on the UN's Universal Declaration from 1948, according to which a connection is created between the legal ties in the Constitution of the Kingdom of Denmark, the articles of the European

Commission on Human Rights and the Treaty of Lisbon. The connection is further strengthened in the teaching with cases of various convictions in Denmark, some of which have been appealed to the European Commission on Human Rights.

In social understanding, the teaching is based on case work on human rights in a micro perspective, where the students are involved in discussions that have to do with, for example, natural law versus legal positivism.

This is supplemented by a presentation with external teachers from Danish Institute Against Torture (DIGNITY). DIGNITY is an independent human rights organization, which deals with torture and how the police can investigate and access information about torture victims in Denmark.

Human Trafficking is a presentation with external lecturers, where the goal is to give the students an understanding of what the concept of human trafficking entails, how the victims are identified and where they can get help and what the police can do.

The teaching is built around 3 focus areas:

1. Strengthened public authority efforts, outreach and identification
2. Better services for victims of human trafficking, and
3. Strengthened prosecution of traffickers.

The legislation in the area is reviewed as well as the elements of the offence. This is followed by a review of the cooperation with the Centre against Human Trafficking based on statistics and conditions that characterize human trafficking.

Case work and investigative steps that the police can initiate are also taken into account. However, the investigation can be challenged by the human considerations that must be taken into account for a person who is trafficked, e.g. culture, distrust of authorities and myths.

The Director of Public Prosecutions has informed that since GRETA's latest evaluation report there have been no new courses regarding human trafficking where all police districts and the State Prosecutors are represented, however THB is continuously discussed in the academic networks for personal and organized crime. Furthermore, the Director of Public Prosecutions regularly participates in national and international conferences on human trafficking.

Furthermore, the guidelines from the Director of Public Prosecutions, concerning trafficking in persons, give specific information on the concept of abuse of a position of vulnerability. These guidelines should always be taken into consideration when handling THB-cases.

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?

In accordance with the Danish Administration of Justice Act section 741 a, potential victims of human trafficking are entitled to legal aid during the trial, if the victims submit a request for legal aid.

According to the Administration of Justice Act section 741 (b), the police must inform the victim of the possibility of obtaining a legal advocate. This information must be given prior to the police's first interview of the victim and must be repeated in connection with the second police interview. The legal advocate is an attorney who can help the victim and safeguard the victim's interests throughout the criminal justice process, at no cost to the victim. A legal advocate's tasks may include explaining the procedures, informing the victim of access to psychological and social support and the right to compensation, assisting them in court, handling the compensation claim and providing assistance if the victim applies for asylum or residence.

In cases concerning human trafficking, the victim will be assigned a contact person if the police expects the victim concerned to appear in court as a witness. The contact person will be able to provide the victim with guidance and information about the victim's legal position and about the case. In addition, the contact person can guide the victim in regards to the victim's options for special considerations to be taken when the victim appears in court. The contact person is typically a police officer. The contact person will help and support the victim if/when the victim contacts the police or prosecutors service.

Pursuant to section 741(a) of the Administration of Justice Act, the court shall assign a lawyer to a victim of trafficking during criminal proceedings at the victim's request. Their tasks include explaining the procedures, informing victims about access to psychological and social support and the right to compensation, assisting them in court, handling the compensation claim and providing assistance if the victim applies for asylum or residence. The lawyers are entitled to participate in the police questioning of the victim and can ask follow-up questions to the victim. Furthermore, the lawyer has access to the victim's statements as well as other documents regarding the victim. The lawyers are assigned free of charge for the victims. If the victim is suspected of having committed a criminal offence, a defence lawyer should be assigned instead.

Furthermore, victims of trafficking are entitled to demand compensation from the traffickers either in connection with the criminal proceedings, in line with section 685 of the Administration of Justice Act, or in a civil court procedure. It is possible for a victim to claim compensation in a civil procedure also independently of the criminal procedures. To claim compensation in criminal court proceedings the victim does not need to be present in court.

Pursuant to section 741 (e) of the Administration of Justice Act, the police and the Prosecution Service must inform a victim including child victims of trafficking of his/her legal position and the progression of the case. This communication should include information on the victim's right to seek compensation as well as information on the perpetrator's possible arrest and being remanded in custody.

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.

In the Danish criminal law, there is a particular focus on the persons behind the trafficking in human beings. The use of services of a victim of trafficking in human beings is not criminalized. However, a person's own exploitation of the victim is covered by the constituent elements of the Danish Criminal Code Section 262 a regarding trafficking in human beings. E.g. a company that knowingly receives a victim trafficked for the purpose of forced labour in order for that person to work for the company may – as well as the person who recruited, transported, transferred and housed the victim – be subject to criminal responsibility pursuant to Section 262 a of the Danish Criminal 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?

To support investigations of THB-cases, Danish Police is using web-scrapers to investigate content on adult service websites (ASWs). The scraping tool can support the police in finding potential victims and potential criminal THB-networks, while also indicating potential addresses, where prostitution likely is taking place.

The Police also uses different OSINT-tools to investigate THB-cases. For instance, manually browsing multiple online adult service websites in specific THB-cases, as well as using certain nationality-based user-profiles to access specific social media groups.

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 requirements in Budapest Convention is largely implemented in Danish Law and are used in THB-cases as well as other crimes.

Part II – Country-specific follow-up questions

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

- facilitate access by presumed victims of THB to lawyers specialised in THB cases; pursue a more proactive approach to the identification of victims of trafficking for the purpose of labour exploitation, through regular and co-ordinated multi-agency labour inspections and enhanced co-operation between relevant agencies and trade unions;
- strengthen the assistance measures offered to victims of THB, in particular by providing a permanent solution for offering safe and suitable accommodation to male victims of THB;
- develop co-operation with specialised NGOs by adequately involving them in the planning, implementation and evaluation of National Action Plans against THB.

Lawyers specialized in THB cases

According to The Danish Court Administration there are no official overview of lawyers specialized in THB cases. Most courts keep an official list of lawyers appointed by the court. The appointed lawyers are giving assistance to e.g. victims of THB in criminal cases. The cost of legal assistance to victims are covered by the State.

In cases of human trafficking or human exploitation, the court must, as a starting point, appoint a legal aid for the victim of THB if the person in question requests it, cf. paragraph 741 a, subsection 1 and 3 in the Administration of Justice Act. Appointment of a legal aid can take place, even if the person(s) behind the organized crime has not (yet) been charged or prosecuted for human trafficking or human exploitation, and even if the human trafficking has only taken place outside of Denmark.

Labour exploitation

The Danish Working Environment Authority (DWEA) has hosted or participated in seminars about trafficking of human beings (THB) in 2020, 2021, and 2022. Inspectors working with the Danish social dumping effort attended the seminars. New seminars will be planned in 2024-25.

The seminars included focus on how to identify possible victims of THB in order to enable inspectors from DWEA to identify these victims and to contact the relevant authorities. DWEA has a focus on THB during inspections in the effort against social dumping where relevant. Please see Q8.

Furthermore, the Danish Working Environment Authority, the Tax Agency and the police carry out nationwide and regional joint actions every year in

places where there is suspicion of social dumping and the use of illegal labor in relevant industries. For example, on construction sites, agriculture, horticulture, cleaning and restaurants.

At the joint actions, the authorities check the companies' working environment and tax conditions, and whether the foreign employees have work permits and/or residence permits. The purpose is to ensure that work in Denmark takes place in accordance with Danish regulations.

Legal assistance

The Danish Centre against Human Trafficking offers victims legal assistance. This is based on an individual assessment of the victims' needs. Examples may include guidance on rights and opportunities, on testifying against traffickers and backers, on guidelines to seek compensation, access to legal assistance, application for residence, asylum, including EU residence and family reunification.

In cases of human trafficking or human exploitation, the court must, as a starting point, appoint a legal aid for the victim of THB if the person in question requests it, cf. paragraph 741 a, subsection 1 and 3 in the Administration of Justice Act. Appointment of a legal aid can take place, even if the person(s) behind the organized crime has not (yet) been charged or prosecuted for human trafficking or human exploitation, and even if the human trafficking has only taken place outside of Denmark.

Meetings in the group of authorities

The Danish Centre against Human Trafficking chairs a group of authorities that meets three times a year to discuss trends and knowledge-sharing. In addition, the authorities meet on ad hoc basis at operational online meetings to address specific cases and for instance to plan joint control visits at workplaces. Participating authorities are currently the Monitoring Police Unit, the Tax Department, the National Prosecution Service, the Immigration Service, the Agency for International Recruitment and Integration, the Financial Intelligence Unit, the Danish Working Environment Authority (the labour inspection). The NGOs who receive funds under the National Action Plan participate at one of the meetings pr. year.

The Danish Centre against Human Trafficking is currently looking at Finland's and Belgium's practices with identification of victims into forced labour through study trips that include meetings with victim identification entities, researchers, labor inspections and the police.

Accommodation for male victims of THB

The Danish Centre against Human Trafficking entered an agreement with a specialized shelter for men (in the city of Fredericia) since 2020 with one room reserved for male victims of human trafficking. Since 2022, the agreement has been extended into having two rooms reserved. The Danish Centre against Human Trafficking is finalizing an agreement with the Salvation Army shelter (Hørhuset), where it is possible to accommodate male victims of human trafficking. The Danish Centre against Human Trafficking also

strives to utilize the specialized care facilities in the asylum system when accommodating male victims of human trafficking who are asylum seekers or with an illegal stay.

Cooperating with specialized NGO's

Both the CMM and the Ministry of Gender Equality are in close and continuous dialogue with the specialized NGO's who receive funds under the current national action plan. Status meetings are held regularly between the various parties.

The specialized NGO's, will be involved in the preparations and organizations of the new action plan when the current action plan runs out in 2025. Please, see Q18.

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

- emerging trends of trafficking in human beings;
- the legislation and regulations relevant to action against THB;
- 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 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);
- recent case-law concerning THB for different forms of exploitation.

Emerging trends of THB

There has been a general increase in the number of calls to the Danish Centre against Human Trafficking regarding potential victims of human trafficking as well as the number of initial identification interviews conducted by the Danish Centre against Human Trafficking.

The authorities have identified 112 victims in 2023, which is an increase from 2022, where 73 persons were identified. It is the same two most prevalent nationalities as the previous years, where most identified victims were from Nigeria and Thailand.

An increasing number of potential victims of human trafficking approach the Danish Centre against Human Trafficking themselves. There is also a increase in referrals of potential victims of human trafficking from Thailand and an increase in the number of persons from Thailand who are officially identified as victims of human trafficking in Denmark. The victims from

Thailand are more inclined to accept assistance and support, including an Assisted voluntary return. This has, amongst other factors, resulted in general increase in the number of persons receiving an assisted voluntary return.

The Danish Centre against Human Trafficking observes an increase in the use of online recruitment of victims of human trafficking and therefore has a focus on technology-facilitated human trafficking as well as obtaining more knowledge on online recruitment.

The institutional framework

Since 2002, the Danish efforts to combat human trafficking have been anchored in interministerial action plans, as the efforts involve several authorities and actors. The Danish Centre against Human Trafficking (CMM) was established in 2007 and forms the core of the nationwide social work efforts for victims of human trafficking. The CMM is located in the National Board of Social Services and Housing and reports to the Minister for Gender Equality.

Assistance and support to the victims of human trafficking is provided through CMM, the National Board of Return, the Danish Immigration Service and other relevant actors on the basis of the action plans.

CMM assesses whether individuals with legal residency in Denmark are victims of human trafficking and therefore should be offered services under the action plan. The Danish Immigration Service assesses whether individuals with illegal stay or asylum seekers are victims of human trafficking. Danish courts and the Prosecution Service can grant the status of victim of human trafficking during criminal proceedings.

The CMM is responsible for coordinating and developing the nationwide social assistance and support for victims of human trafficking, for coordinating cooperation in the area, and for collecting and disseminating knowledge and statistics. CMM is responsible for a number of regular and ad hoc-based meeting forums, networks and partnerships.

The Department for Gender Equality, under the Minister for Gender Equality, is heading the inter-ministerial working group which coordinates the government's efforts to combat human trafficking and develops the national action plan that forms the basis of the Danish efforts to combat trafficking in human beings. The Department for Gender Equality is coordinating the implementation of the action plan.

Besides the Department for Gender Equality, the inter-ministerial working group consists of the Ministry of Immigration and Integration, the Ministry of Justice, the Ministry of Employment, the Ministry of Housing, Social Affairs and the Elderly, the Ministry of Taxation, the Ministry of Interior and Health and the Ministry of Foreign Affairs. The Ministry of Justice is responsible for the police's efforts, including investigation and prosecution. And the Ministry of Employment is relevant in relation to forced labor and the Tax Agency in relation to their control activities outside companies.

In-depth analysis of the social efforts to victims of THB

A main result of the working group was an in-depth analysis of the social efforts for people exposed to human trafficking, which was prepared in connection with the expiry of the previous national action plan for 2019-2021. The report was published in September 2021 and has formed the basis for the content of the current national action plan for 2022-2025.

The subject field of the analysis was:

- the social work effort in the form of the organization of the outreach efforts to victims of human trafficking,
- the identification process, offers of support and assistance to victims of human trafficking during the recovery and reflection period in Denmark, including accommodation and other social assistance,
- the provision of prepared repatriation and reintegration, as well as the coordination, information and monitoring of the effort.

The analysis included Denmark's international obligations in relation to the social efforts for victims of human trafficking, recent evaluations of the efforts (both Danish and international) and in selected areas international experiences. For the purpose of the analysis, interviews were conducted with the NGOs that received funding under the action plan, as well as a number of researchers and experts in the field of human trafficking.

On the basis of the analysis, possible measures were set in relation to the content and organization of the social efforts for victims of human trafficking.

National rapporteur or equivalent mechanism The CMM still functions as Denmark's rapporteur-like mechanism in the area of human trafficking and is part of the EU's Network of National Rapporteurs or Equivalent Mechanisms on Trafficking in Human Beings (NREM), where knowledge and experience on efforts and trends are collaborated and exchanged. CMM is responsible for i.a. to report on the coordination and development of social initiatives in Denmark.

As a supplement to this, with the current action plan, DKK 1 million has been set aside to the 'Danish Institute for Human Rights for an independent study of the efforts to victims of human trafficking, including in relation to Denmark's international obligations.

National Action Plan to Combat Trafficking in Human Beings 2022-2025 Resources

In November 2021, the government, with broad agreement from the parliament, agreed to allocate 118.2 million DKK for a new action plan in 2022-2025. This is a strengthening of the effort of more than 7 million DKK annually compared to the previous action plan for 2019-2021.

The action plan finances the Danish Centre against Human Trafficking including funds for social offers to the victims as well as the purchase of ac-

commodation, grants to NGOs for outreach work and grants for the Nest International's specialized accommodation offer for trafficked women. With the political agreement, the Nest International has received an additional 1 million DKK to upscale the specialized accommodation offer for victims to recover e.g. with the creation of single rooms. The Nest International receives a total of 6 mio. DKK annually to run the specialized shelter for victims. That is an upgrade of 1.5 mio. DKK.

With the action plan, the outreach work in relation to victims of human trafficking among the NGOs is strengthened by 3.0 million DKK annually, so that on average 9.2 million DKK is now used annually on this part of the effort.

Content

The action plan for 2022-2025 consists of three focus areas with a range of initiatives.

Focus area 1: Strengthened government efforts, outreach work and identification

- CMM's participation in joint authority actions is strengthened: To identify more victims of human trafficking, the possibility is explored that the CMM is given clearer powers to participate in other authorities' control activities and in joint authority actions, including talking to potential victims without others e.g. the employer being present.
- Strengthening identification interviews: NGOs have previously been able to conduct the official identification interviews with potential victims of human trafficking. Now, identification interviews are handled by the CMM and the Danish Immigration Service to create uniformity in the identifications of the victims and thus the basis for allocating support, as well as to ensure personal data protection. There will continue to be close cooperation between the CMM and the NGOs in relation to the potential victims of human trafficking with whom the NGOs make contact, as well as general knowledge sharing in the field.
- Sharing of information between authorities: It is examined whether there is a need to clarify CMM's possibilities for more systematically sharing sensitive and confidential information, including trafficking assessments, with relevant authorities with the aim of preventing and identifying victims and prosecuting perpetrators. However, with the possibility of exceptions if it is considered to be problematic in relation to the cooperation with the victim.
- Strengthened outreach work under the auspices of the NGOs: The Nest International takes over CMM's outreach work in the form of social and health services in the capital area and on Zealand, and the efforts are strengthened. AmiAmi takes over CMM's outreach work in the field of prostitution in North and Central Jutland, and the efforts are strengthened. AmiAmi also continues their existing outreach efforts towards potential victims of human trafficking, especially in relation to foreign

women in prostitution in the Region of Southern Denmark. HopeNow's existing outreach efforts at street level in Copenhagen are maintained.

- Study of the efforts to combat human trafficking: In 2024-2025, the Danish Institute for Human Rights will conduct a study of the efforts to victims of human trafficking, including in relation to Denmark's international obligations.

Focus area 2: Better offers for victims of human trafficking

- Upgrade of the specialized accommodation offer: Accommodation is strengthened through an upgrade of The Nest International's specialized accommodation offer for women victims of human trafficking. This includes funds to establish itself in new premises with the possibility of single rooms for all victims.
- Greater flexibility in the accommodation offers: The possibility to increase the flexibility in the accommodation of victims of human trafficking by creating a legal basis for victims of human trafficking to be accommodated in existing shelters approved under the Service Act has been examined. However, it has not been possible to create a new legal basis due to technical and administrative reasons. The Nest's specialized accommodation offer for female victims is upscaled and continued. And the CMM continues its current practice of housing victims at other appropriate shelters according to the special needs of the victim.

Focus area 3: Strengthened prosecution

- Strengthened efforts in the police: In connection with the agreement on the police and the prosecution's finances 2021-2023, it was agreed to strengthen efforts against forced labor, sexual exploitation and work under slave-like conditions, by adding 6 extra full-time equivalents in 2023 to the work in the police district to carry out an appropriate control pressure against restaurants, construction sites, kiosks, the prostitution environment, etc., which increases the probability of identifying and detecting forced labor.
- National Investigation Unit: Under the auspices of the above agreement, a new effective national investigation unit has been established in 2022. Here the most specialized police and prosecutorial competencies is brought together. The aim of the unit is to ensure a significant strengthening of efforts against the most complex economic and organized crime including human trafficking. In addition, the National Investigation Unit will support the police districts in their efforts against human trafficking.
- New provision in the Danish Criminal Code: The Government has introduced a new independent provision in the criminal code that criminalizes the exploitation of others for forced labor and work under manifestly unreasonable conditions. The bill was passed in the Danish Parliament, and the new provision, 262 b in the Criminal Code, entered into force 1 June 2022.

Implementation

The implementation of the action plan has been qualified by the inter-ministerial analysis of the effort. Relevant ministries, agencies, civil society actors and researchers have been involved in this work. Meetings are held regularly in the inter-ministerial working group to discuss the implementation of the action plan.

The Gender Equality Department is in close dialogue with the Danish Centre against Human Trafficking about the implementation of changes to their efforts, as well as with the NGOs about their grants and efforts under the action plan. Status meetings are held regularly between the various parties.

There is also a close dialogue between the Danish Centre against human Trafficking and the NGOs about new procedures and the division of responsibilities under the action plan.

Future efforts after expiry of current action plan

The inter-ministerial working group will convene in 2024 in order to prepare for future efforts when the current national action plan ends in 2025. Relevant actors, such as the NGO's who receive funds under the national action plan, will be involved in the preparations of new efforts and focus areas.

Legislation and regulations

The Danish effort to combat human trafficking are anchored in the national action plans which is based on the Finance Act.

In May 2022, the Danish government adopted a new provision in the Danish Criminal Code, which independently criminalizes the exploitation of other person's substantial financial or personal problems, lack of insight, rashness or an existing co-dependency to work under obviously unreasonable conditions (section 262 b).

Even though, there already was a criminal protection against the exploitation of vulnerable workers, the criminal protection was increased to reflect the seriousness of the crime. Further, the provision has basis in a rapport from an inter-ministerial working group regarding the protection of vulnerable workers who e.g. pointed out the difficulty of proving forced labour.

Since January 1, 2020, six judgments have led to the conviction of seven individuals for human trafficking offences. In five out of six cases, the victims have been exploited for prostitution. In one case, the victim was exploited for criminal acts, as the victim was forced to commit thefts.

Part III - Statistics on THB

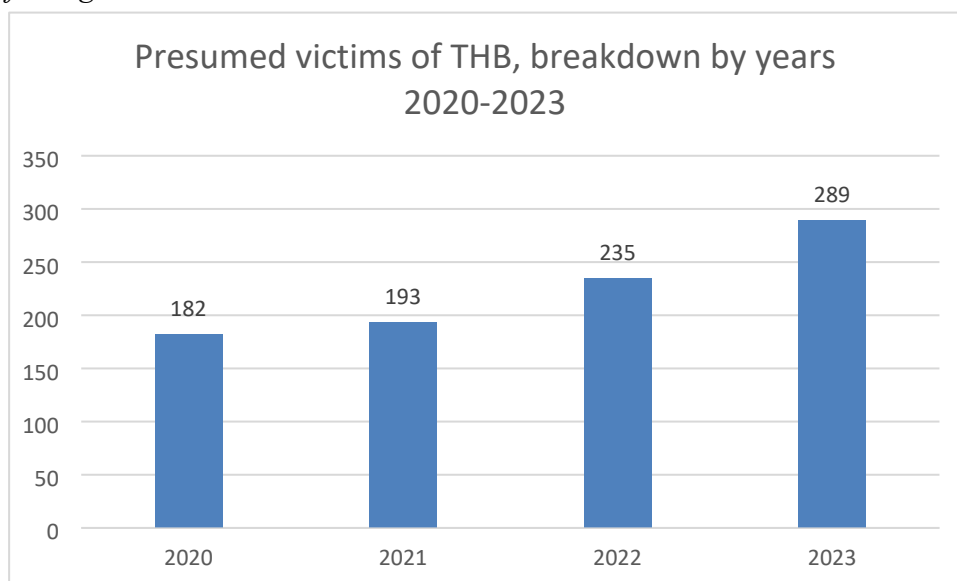
42. Please provide the following statistics, per year starting with 2020, where available disaggregated as indicated below:

- 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).

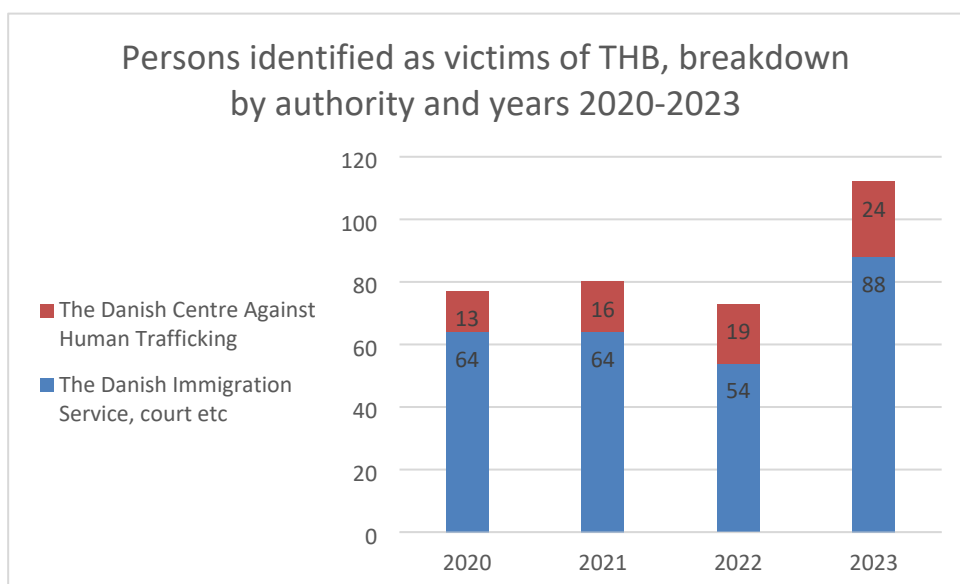
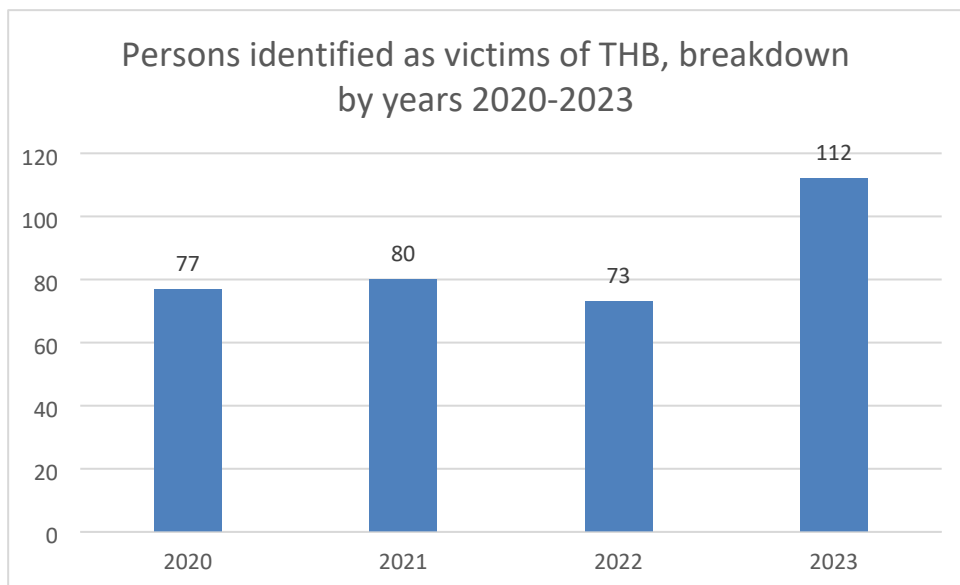
Number of presumed victims of THB

In the following “Presumed victims” should be understood as persons being referred to NGOs under the National Action Plan to combat Human Trafficking or the Danish Centre against Human Trafficking for a trafficking interview. After the interview, the case has been referred to relevant authorities for the assessment / final identification of human trafficking. From 2022 and onward, the Danish Centre against Human Trafficking is responsible for carrying out all the trafficking interviews. During the previous action plan NGO’s and the Danish Centre against Human Trafficking shared this task.

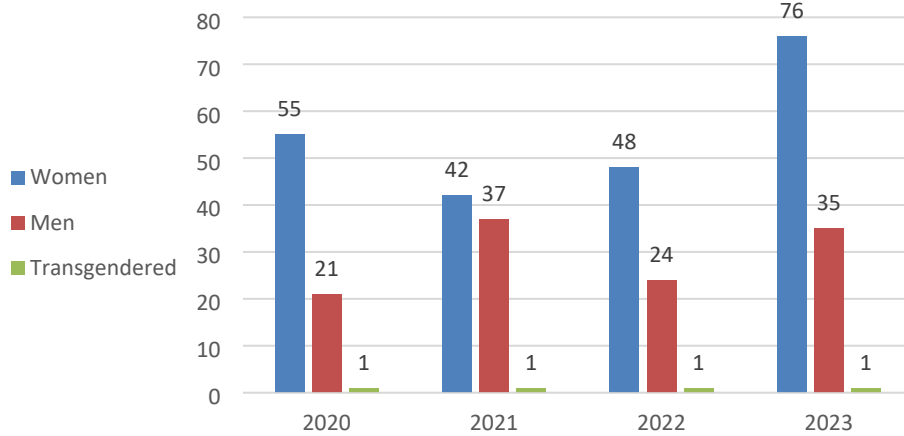
Persons interviewed by NGOs or the Danish Centre against Human Trafficking



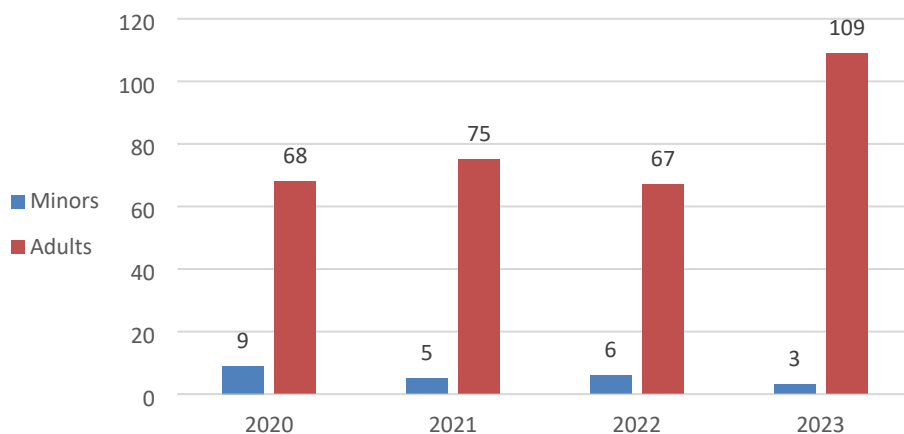
In the period 2020 – 2023, the Danish Authorities have identified 342 persons as victims of THB. Nine of the 342 persons are Danish citizens being trafficked in Denmark.

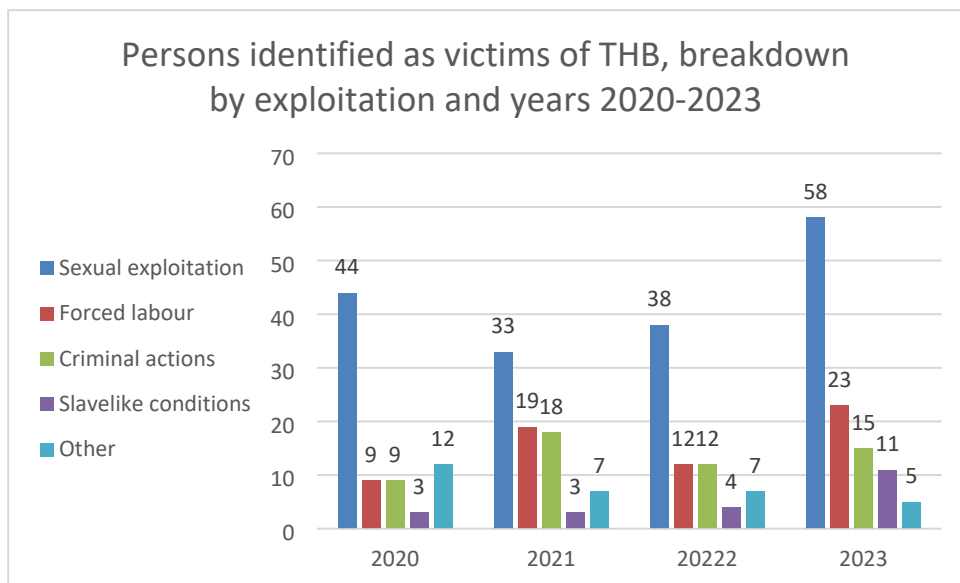


Persons identified as victims of THB, breakdown by gender and years 2020-2023



Persons identified as victims of THB, breakdown by age and years 2020-2023





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

All figures provided below are subject to general uncertainty, as the immigration authorities' electronic case management system is structured as a record-case management system and not as an actual statistical system. The data is not disaggregated as requested due to discretionary considerations.

In the period from 1 January 2020 to 5 May 2024, 95 victims of THB lodged an asylum application in Denmark.

The Danish Immigration Service does not maintain structured data (metadata) regarding victims of THB identified as a part of the asylum procedure. Some of the 95 victims who lodged an asylum application were identified before and some after lodging the asylum application and not necessarily as a part of the asylum procedure.

The number of victims of THB lodging an asylum application in Denmark by sex:

<u>Sex</u>	<u>Total</u>
<u>Female</u>	<u>34</u>
<u>Male</u>	<u>61</u>
<u>Total</u>	<u>95</u>

The number of victims of THB lodging an asylum application in Denmark by nationality:

Nationality	Total
Marocco	18
Nigeria	10
Vietnam	8
Algeria	6
Uganda	5
Afghanistan	5
Somalia	5
Others	38
Total	95

The number of victims of THB lodging an asylum application in Denmark by age at the time of the application:

Age group	Total
<18	19
18-19	14
20-24	18
25-29	14
30-34	13
35+	17
Total	95

The figures for the period 2020-2023 are final. The figures for the period 1 January 2020– 5 May 2024 are provisional.

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

All identified victims of THB are offered assistance e.g. accommodation, case management by the Danish Centre against Human Trafficking, health care, legal assistance and assisted voluntary return.

In the figures below, victims of THB who received one of the abovementioned forms of assistance are included.

Number of victims of THB who received assistance, disaggregated by sex and years 2020-2023

SEX	Number
2020	74
Women	55
Men	18
Transgendered	1
2021	74
Women	38
Men	35
Transgendered	1
2022	62
Women	43
Men	18
Transgendered	1
2023	101
Women	67
Men	33
Transgendered	1
Total	311

AGE	Number
2020	74
Over 18 years	66
Under 18 years	8
2021	74
Over 18 years	69
Under 18 years	5
2022	62
Over 18 years	56
Under 18 years	6
2023	101
Over 18 years	98
Under 18 years	3
Total	311

EXPLOITATION	Number
2020	74
Sexual exploitation	44
Other	10
Criminal actions	9
Forced labour	8
Slavelike conditions	3
2021	74
Sexual exploitation	29
Forced labour	19
Criminal actions	17
Other	6
Slavelike conditions	3
2022	62
Sexual exploitation	32
Forced labour	11
Criminal actions	9
Other	6
Slavelike conditions	4
2023	101
Sexual exploitation	51
Forced labour	21
Criminal actions	14
Slavelike conditions	10
Other	5
Total	311

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

The Danish Immigration Service does not maintain structured data (meta-data) regarding the basis on which applicants are granted refugee status or subsidiary protection status.

As already remarked in Q26, to be a victim of THB does not necessarily confer the applicant with refugee status or subsidiary protection status. In cases where a victim of THB is granted a residence permit on the basis of asylum, the residence permit may have been granted for reasons other than THB.

Persons identified as victims of THB, breakdown by nationality and years
2020-2023

2020		2021		2022		2023	
Nigeria	18	Nigeria	16	Nigeria	13	Nigeria	20
Thailand	11	Thailand	11	Thailand	9	Thailand	17
Morocco	10	Morocco	9	Morocco	7	Ukraine	8
Brazil	5	Romania	6	Romania	6	Romania	7
Denmark	5	Vietnam	6	Ukraine	4	Philippines	5
Ukraine	3	China	5	Poland	3	Vietnam	5
Uganda	3	Afghanistan	3	Spain	3	Morocco	4
Ghana	3	Ghana	2	Algeria	2	Uganda	4
India	3	Algeria	2	Uganda	2	Brazil	4
Romania	2	Pakistan	2	Serbia	2	Somalia	3
Vietnam	2	Cameroun	2	Philippines	2	Denmark	3
Serbia	2	Kenya	2	Brazil	2	Syria	3
Afghanistan	1	Denmark	1	Somalia	2	Columbia	2
Algeria	1	Ukraine	1	Columbia	2	China	2
Syria	1	Uganda	1	Vietnam	1	Albania	2
Gambia	1	India	1	China	1	Congo	2
Pakistan	1	Serbia	1	Afghanistan	1	Macedonia	2
Bangladesh	1	Gambia	1	Ghana	1	Algeria	1
Bulgaria	1	Bulgaria	1	Russia	1	Afghanistan	1
Guinea-Bissau	1	Philippines	1	Albania	1	Russia	1
Kosovo	1	Russia	1	Eritrea	1	Eritrea	1
Zambia	1	Hungary	1	Paraguay	1	Paraguay	1
		Cambodia	1	Lithuania	1	Gambia	1
		Iraq	1	Malaysia	1	Hungary	1
		Surinam	1	Sudan	1	Bangladesh	1
		Tanzania	1	Tunis	1	Burundi	1
				USA	1	Egypt	1
				Venezuela	1	Ecuador	1
						Equatorial Guinea	1
						France	1
						Iran	1
						Latvia	1
						Stateless	1
						Panama	1
						Spain	1
						Sri Lanka	1
Total	77		80		73		112

Note: The discrepancy between the number of victims identified, the number of victims granted a recovery and reflection period and the number of victims receiving assistance can be explained by victims declining support, victims disappearing before getting in contact with the Danish Centre against Human Trafficking, victims leaving the country before the assessment of being a victim of THB etc.

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

In the period from 1 January 2020 to 5 May 2024, 20 victims of THB under the age of 18 were identified. All unaccompanied minors are appointed legal guardians.

The figures for the period 2020-2023 are final. The figures for the period 1 January 2024 – 5 May 2024 is provisional.

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

Persons identified as victims of THB are granted a recovery and reflection period of 30 days with the possibility of an extension of 90 days.

The circumstances for granting a recovery and reflection period differs according to the residency status of the victim.

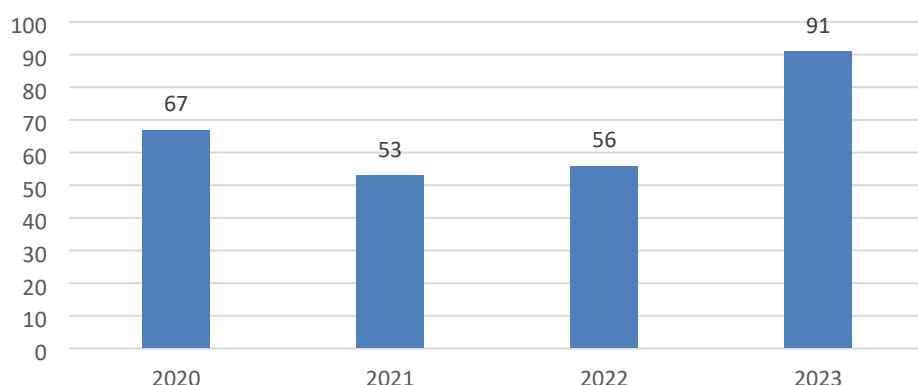
The Danish Immigration Service is responsible for granting the recovery and reflection period for persons, with an illegal residency status in Denmark and for persons seeking asylum.

Victims seeking asylum are granted a recovery and reflection period, when their asylum case have been assessed. Meanwhile they are offered support under the National Action Plan according to their individual needs.

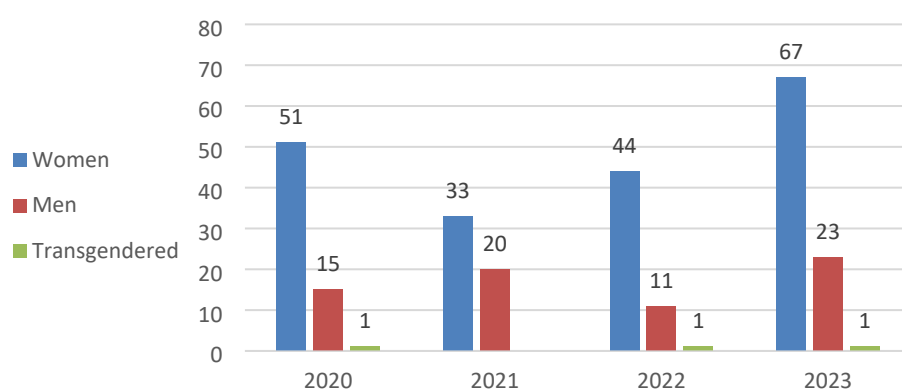
The Danish Centre against Human Trafficking grants the recovery and reflection period for person with a legal residency status in Denmark (e.g. EU member state nationals and Danish nationals).

In the figures below, the number of victims of THB granted a reflection period refers to the year they were identified as victims of THB. The majority of victims of THB who were not granted a reflection period, were asylum seekers. Thus, some might still be granted a reflection period in the months and years to come. As mentioned above, they are still offered support under the National Action Plan 2022-2025 in the meantime.

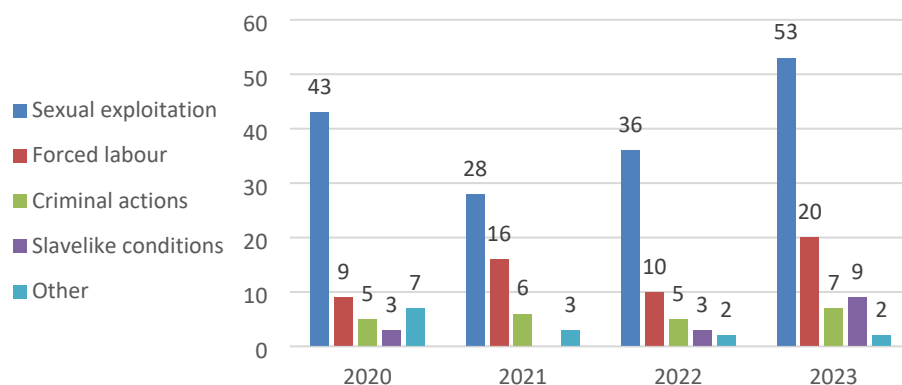
Persons identified as victims of THB and granted a reflection period, breakdown by years 2020-2023

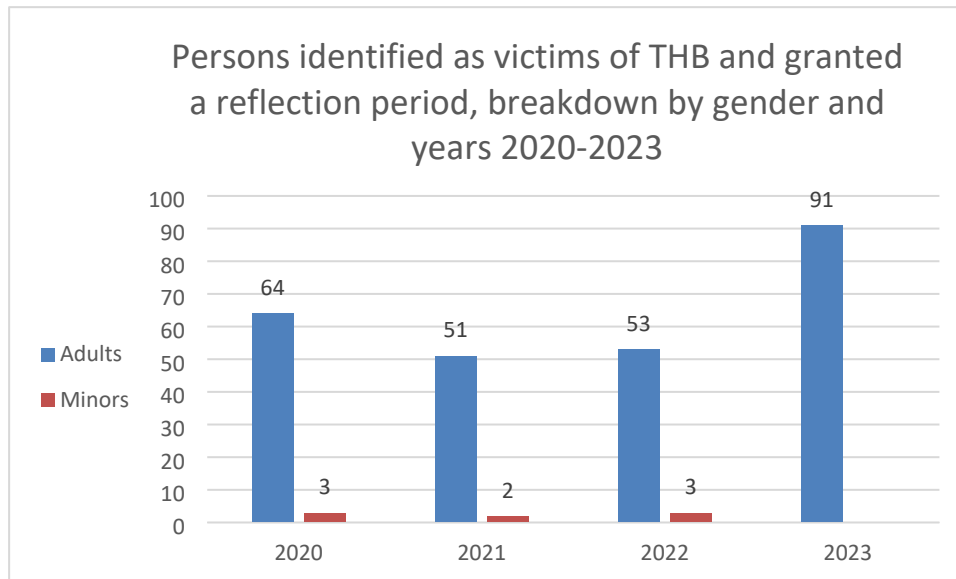


Persons identified as victims of THB and granted a reflection period, breakdown by gender and years 2020-2023



Persons identified as victims of THB and granted a reflection period, breakdown by exploitation and years 2020-2023





Persons identified as victims of THB and granted a reflection period, breakdown by nationality and years 2020-2023

2020		2021		2022		2023	
Afghanistan	1	Afghanistan	2	Afghanistan	1	Afghanistan	1
Algeria	1	Algeria	1	Albania	1	Albania	2
Brazil	5	Bulgaria	1	Algeria	1	Algeria	2
Bulgaria	1	Cambodia	1	Brazil	2	Bangladesh	1
Denmark	5	Cameroun	2	China	1	Brazil	4
Gambia	1	China	5	Columbia	2	Burundi	1
Ghana	3	Denmark	1	Eritrea	1	China	1
Guinea	1	Ghana	2	Ghana	1	Colombia	2
India	2	Hungary	1	Lithuania	1	Congo	2
Kosovo	1	India	1	Malaysia	1	Denmark	3
Morocco	9	Iraq	1	Morocco	5	Ecuador	1
Nigeria	18	Kenya	2	Nigeria	9	Egypt	1
Pakistan	1	Morocco	9	Paraguay	1	Eritrea	1
Romania	2	Nigeria	13	Philippines	2	Gambia	1
Serbia	2	Pakistan	2	Poland	3	Hungary	1
Syria	1	Philippines	1	Romania	6	Iran	1
Thailand	11	Romania	6	Russia	1	Latvia	1
Uganda	3	Russia	1	Serbia	2	Macedonia	1
Ukraine	3	Serbia	1	Somalia	2	Morocco	3
Vietnam	2	Surinam	1	Spain	3	Nigeria	17
Zambia	1	Tanzania	1	Sudan	1	Panama	1
		Thailand	11	Thailand	9	Paraguay	1
		Uganda	1	Uganda	2	Philippines	4
		Ukraine	1	Ukraine	3	Romania	6
		Vietnam	6	USA	1	Russia	1

				Somalia	3
				Spain	1
				Sri Lanka	1
				Stateless	1
				Syria	3
				Thailand	16
				Uganda	3
				Ukraine	8
				Vietnam	5
TOTAL	74	74	62		101

- Number of victims of THB granted a residence permit, with an indication of the type of 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)

In the period from 1 January 2020 to 5 May 2024, 39 victims of THB were granted a residence permit.

Three aliens were granted a residence permit for the purpose of cooperation in investigations/proceedings. All others were granted residence permits on the basis of asylum, family reunification, work, study or on other grounds. The duration of the residence permits varies from 6 month to 5 years. The three aliens who were granted a residence permit for the purpose of cooperation in investigations/proceedings were all in their twenties.

Some aliens may have been granted more than one residence permit. The Danish Immigration Service does not maintain structured data (metadata) regarding the form of exploitation identified.

The number of victims of THB granted a resident permit in Denmark by sex:

Sex	Total
Fe- male	35
Male	5
Total	40

The number of victims of THB granted a residence permit in Denmark by nationality:

Nationality	Total
Uganda	6
Thailand	5
Afghanistan	5
Nigeria	5
Others	19
Total	40

The number of victims of THB granted a resident permit in Denmark by age at the time of the issuing of the permit:

Age group	Total
<24	5
25-29	13
30-34	7
35+	15
Total	40

The figures for the period 2020-2023 are final. The figures for the period January 1st – May 5th 2024 is provisional.

- 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).

The Danish Immigration Service does not maintain structured data (metadata) regarding the basis on which applicants are granted refugee status or subsidiary protection status.

As already remarked in Q26, to be a victim of THB does not necessarily confer the applicant with refugee status or subsidiary protection status. In cases where a victim of THB is granted a residence permit on the basis of asylum, the residence permit may have been granted for reasons other than THB.

- 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).

The Director of Public Prosecutions has examined six cases where the perpetrator was convicted of THB (convictions in 2022 – 2024, see table 1 and 2 below). In three out of six cases, the courts ordered compensation for injury to the victims (tortgodtgørelse). In one other case, the court postponed the question regarding compensation, since neither the court nor the support attorney had contact with the victims. In two cases, the prosecution did not seek compensation, as the victims were not involved in the court proceedings.

Table 1. Overview of convictions for violation of section 262 a (1) of the Criminal Code, broken down by the perpetrator's sex, nationality, age and form of exploitation

Year of conviction	Sex	Nationality	Age (at the time of the offense)	Form of exploitation
2022	Male	Hungary	22	Prostitution
2022	Female	Romania	38	Prostitution
2023	Male	Latvia	21	Prostitution
2023	Male	Russia	26	Prostitution
2023	Male	The Netherlands	26	Prostitution
2024	Male	Romania	35	Prostitution
2024	Male	Romania	36	Criminal acts (thefts)

Table 2. Overview of convictions for violation of section 262 a (1) of the Criminal Code, broken down by the form of exploitation, whether the victim was adult or child, the type and duration of penalties

Year of conviction	Form of exploitation	Victim: Adult/child	Type of penalty	Duration of penalty
2022	Prostitution	Adult (one victim)	Prison sentence	10 months' imprisonment (also convicted of other violations)
2022	Prostitution	Adult (one victim)	Prison sentence	6 months' imprisonment (also convicted of other violations)
2023	Prostitution	Adults (four victims)	Prison sentence	3 years and 6 months' imprisonment and 4 years and 6 months' imprisonment (also convicted of other violations)
2023	Prostitution	Adults (four victims)	Prison sentence	6 years imprisonment (also convicted of other violations)
2024	Prostitution	Adult (four victims)	Prison sentence	2 years and 6 months' imprisonment (also convicted of other violations)
2024	Criminal acts (thefts)	Adult (one victim)	Prison sentence	1 year and 9 month's imprisonment (also convicted of other violations)

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

Please see the answer above.

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

Victims of THB are eligible for legal assistance under the national action plan to combat human trafficking. The Danish Centre against Human Trafficking have registered that eight persons have received legal assistance

from an external lawyer funded by the national action plan in the period 2020-2024.

The eight persons are all over the age of 18 years. Four are women and four are men. The four women are from China, Romania, Serbia and Nigeria. The four men are from China, India and two from Romania.

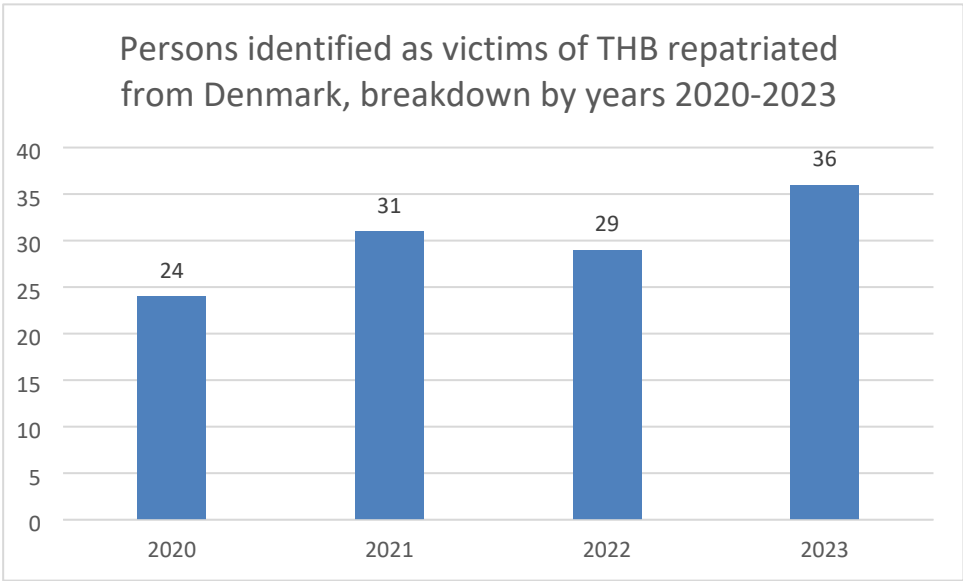
In addition to legal aid funded by the National Action Plan, victims of THB might receive free legal aid in other settings e.g. from LGBT asylum (a group providing counselling for LGBT+ asylum seekers and refugees) and from NGO's, e.g. DRC Danish Refugee Council. The Danish Centre against Human Trafficking does not have data on these forms of legal aid.

In four out of the six cases mentioned in Q41, the victims were provided with a support attorney free of charge. In the other two cases, the victims were not involved in the court proceedings and as a result, they were not provided with a support attorney.

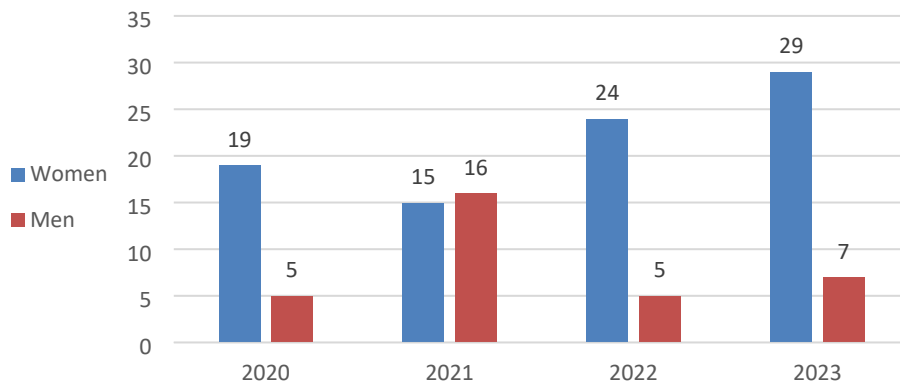
- Number of victims of THB who were returned or repatriated to/from your country (disaggregated by sex, age, country of destination, form of exploitation).

The data below represents victims of THB who received an assisted voluntary return with reintegration-support. The data refers to victims of THB being identified the current year. The prepared return might be completed the following years.

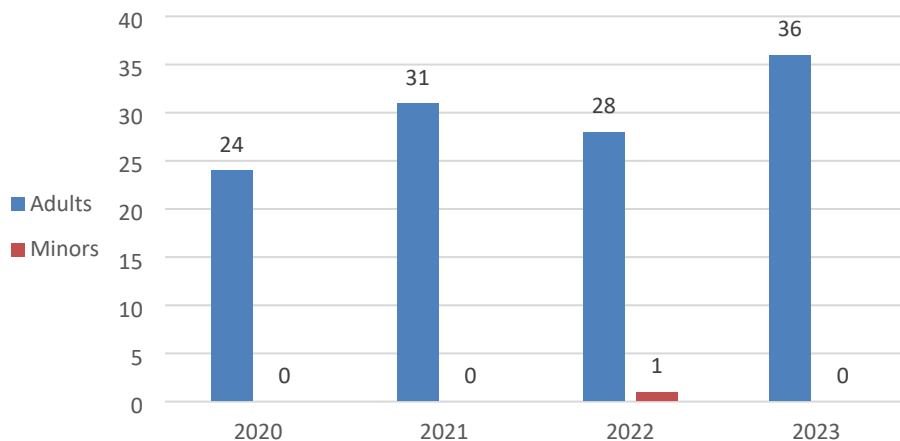
The reasons why some victims do not wish to accept the prepared repatriation are very different. This may be due, for example, to the fact that the person previously had a ticket home, which they wish to use, and that people who have legal residence in Denmark, e.g. EU citizens, have the option of staying in Denmark and continuing to look for work.



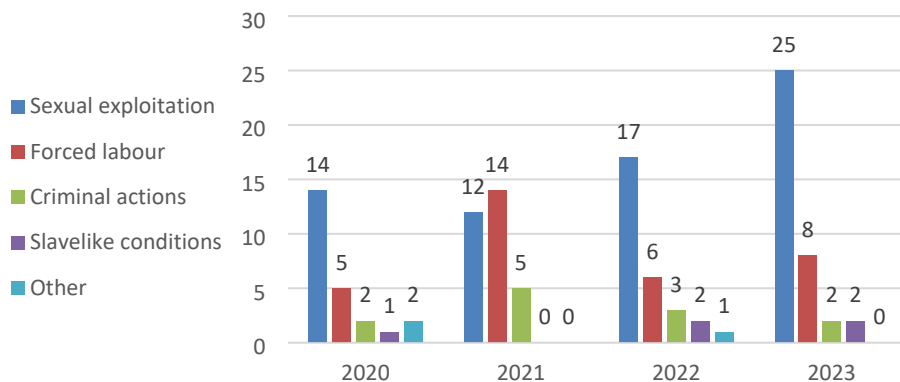
Persons identified as victims of THB repatriated from Denmark, breakdown by gender and years 2020-2023



Persons identified as victims of THB repatriated from Denmark, breakdown by age and years 2020-2023



Persons identified as victims of THB repatriated from Denmark, breakdown by exploitation and years 2020-2023



Persons identified as victims of THB repatriated from Denmark, breakdown by destination and years 2020-2023

2020	2021	2022	2023
Thailand 8	Thailand 9	Thailand 7	Thailand 14
Ghana 3	Romania 6	Spain 3	Ukraine 5
Brazil 2	China 5	Brazil 2	Brazil 4
Nigeria 2	Nigeria 3	Romania 2	Colombia 2
Romania 2	Morocco 2	Morocco 2	Nigeria 2
Kosovo 1	Bulgaria 1	Poland 2	Latvia 1
Bulgaria 1	Philippines 1	Philippines 2	Russia 1
Ukraine 1	Surinam 1	Russia 1	Romania 1
Morocco 1	Ghana 1	Serbia 1	Panama 1
Serbia 1	Afghanistan 1	Uganda 1	Spain 1
Gambia 1	Ukraine 1	Paraguay 1	Philippines 1
Uganda 1		Nigeria 1	Congo 1
		Ghana 1	Paraguay 1
		Ukraine 1	Vietnam 1
		Colombia 1	
		USA 1	

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

In five out of the six cases mentioned in Q41, the victims were exploited for prostitution. In one case, the victim was exploited for criminal acts, as the victim was forced to commit thefts. Please see Table 1. “Overview of convictions for violation of section 262 a (1) of the Criminal Code, broken down by the perpetrator’s sex, nationality, age and form of exploitation” above.

Furthermore, The Danish National Police has gathered information from the Police case-system (POLSAS) and on the basis of this information the Danish National Police can report that there have been the following number of investigations regarding reports to the police during the period 2020-2023:

- 2020:
 - Human trafficking: 17 cases
 - Number of identities registered as “victim” or person who has reported the offence who is also the victim: 12 identities
- 2021:
 - Human trafficking: 16 cases
 - Number of identities registered as “victim” or person who has reported the offence who is also the victim: 13 identities
- 2022:
 - Human trafficking or human exploitation: 17 cases

- Number of identities registered as “victim” or person who has reported the offence who is also the victim: 27 identities
- 2023:
 - Human trafficking or human exploitation: 42 cases
 - Number of identities registered as “victim” or person who has reported the offence who is also the victim: 40 identities

Please note that the same identity/person may be registered on multiple cases.

It is not possible for the Danish National Police to disaggregate the cases by type of exploitation, given that this would involve a manual review of all the above cases from all the relevant police districts in order to determine the type of exploitation. Given the resources that this would entail, the Danish National Police has not conducted this manual review.

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

Please see Table 2 “Overview of convictions for violation of section 262 a (1) of the Criminal Code, broken down by the form of exploitation, whether the victim was adult or child, the type and duration of penalties” above.

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

Please see Table 1 “Overview of convictions for violation of section 262 a (1) of the Criminal Code, broken down by the perpetrator’s sex, nationality, age and form of exploitation” above.

- 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.

Please see Table 2. “Overview of convictions for violation of section 262 a (1) of the Criminal Code, broken down by the form of exploitation, whether the victim was adult or child, the type and duration of penalties” above.

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

Since 1 January 2020, there have been three convictions where the court ordered confiscation from the convicted persons. However, the convicted persons were also convicted of other crimes and it is not possible to indicate

the specific amount of confiscations regarding the offences for trafficking in human beings.

- Number of convictions of legal entities for THB.

Since January 1, 2020, there has been no convictions.