

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



CP(2026)02

Report submitted by the authorities
of Finland
on measures taken to comply with
Committee of the Parties Recommendation
CP/Rec(2024)02 on the implementation
of the Council of Europe Convention
on Action against Trafficking in Human
Beings

Third evaluation round

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Report of the Government of Finland
on the measures taken to improve the implementation of the
Council of Europe Convention on Action against Trafficking in Human Beings
Issues for immediate action
6 June 2026

The Government of Finland acknowledges recommendation (CP/Rec(2024)02) on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Finland.

In the aforementioned recommendation, the Committee of the Parties to the Convention has requested the Government to report to the Committee on the measures taken to improve the implementation of the Convention in the areas identified in paragraph A. of the recommendation, *i.e.* on measures taken to address the issues for immediate action identified in the report of the Group of Experts on Action against Trafficking in Human Beings (GRETA), by 21 June 2026.

In response to the above-mentioned request, the Government would like to submit the following information.

General

One of the objectives of Prime Minister Petteri Orpo's Government Programme (20 June 2023 -) "A strong and committed Finland" is to improve the fight against human trafficking, to ensure the exchange of information between authorities and to prevent human trafficking in a cross-administrative and comprehensive manner. In accordance with the decision of the Government's plenary session in March 2024, the decision-in-principle on Action Plan against Trafficking in Human Beings 2021-2023 was to be updated in 2025.

On 3 April 2025, the Ministry of Justice appointed an intersectoral working group to prepare an updated Action Plan against trafficking in human beings. Special focus areas are trafficking in human beings related to sexual exploitation, trafficking in children and young persons, forced marriage and trafficking in human beings related to juvenile and gang crime and organized crime. Authorities, organizations and experience experts were consulted during the preparation.

The Ministerial Working Group on Internal Security and Administration of Justice approved/adopted a new Action Plan against Human Trafficking for 2026–2027 on 15 April 2026. The Government resolution on the matter was adopted on 28 May 2026, when the Action Plan was published.

The action plan is based on four strategic objectives, and it contains 43 measures. The aim is to address the priority areas specified in the appointment decision and to implement the Government Programme's entry on the cross-administrative and comprehensive prevention of human trafficking. The action plan will be implemented in 2026–2027. The working group will monitor the implementation until the end of 2027 and report on its progress to the ministerial working group on internal security and administration of justice.

In accordance with the Government Programme, the Ministry of Justice has established a coordination group, mandated to operate until the end of 2026 to follow and support legislative initiatives undertaken by the ministries with the aim of removing barriers to the exchange of information relevant to crime prevention.

The recommendations to Finland adopted by the Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings in its the 34th meeting held on 21 June 2024 are the following:

1. Make additional efforts to guarantee effective access to compensation for victims of human trafficking, in particular by:

- ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain from the exploitation of the victim, is part of the criminal investigations with a view to supporting compensation claims in court;
- systematically carrying out financial investigations to locate executable assets or income of offenders in human trafficking cases with a view to freezing or seizing them to secure future compensation claims by victims, and ensuring that victims have effective access to those assets or income;
- ensuring that the length of the judicial proceedings (criminal and civil) to claim compensation from the perpetrator is reasonable;
- reviewing the eligibility criteria for state compensation, in particular the criterion of significant damage, with a view to making state compensation available to all victims of trafficking (paragraph 81);

In Finland, both the opportunities for victims of human trafficking to obtain compensation and the Police's possibilities to investigate human trafficking as an economic crime have continued to be strengthened. Key factors in this change include victim identification, the role of the National Assistance System, and systematic assessment of financial harm.

The right to compensation has been strengthened, in particular, by improving pre-trial investigations: the police and prosecutors have been instructed to systematically collect information on the harm suffered by the victim as well as on the financial benefit obtained through the offence. At the same time, greater emphasis has been placed on financial investigations and the confiscation of criminal proceeds, so that perpetrators' assets can be used to satisfy victims' compensation claims.

A victim can be admitted to the National Assistance System even before a criminal conviction. The National Assistance system provides advice and guidance and can give support for victims of human trafficking for them to get legal advice and to apply for unpaid wages and damages. The Government Proposal HE 21/2026 vp would also extend the use of coercive measures and the criminal liability of legal persons to cases of work-related exploitation that are less serious than human trafficking.

The system concerning the victim surcharge has been further developed (including an increase in the surcharge in 2026), which has increased funding for victim support services. Additionally, a government grant appropriation of €260,000 was applied for to combat labor exploitation, secure

support services for victims of human trafficking, and assist victims of honor-based violence. This also indirectly supports compensation processes for victims of human trafficking.

Following a decision issued by the Deputy Chancellor of Justice in 2021, additional training and more detailed guidance have continued to be provided, particularly with regard to the calculation of criminal proceeds, the use of coercive measures (such as seizure), and corporate criminal liability. As a result of these measures, economic harm is now documented more comprehensively as part of pre-trial investigations and prosecutorial consideration, which also improves victims' chances of receiving actual compensation.

Finland's international obligations, as well as the EU Anti-Trafficking Directive (2011/36/EU) and its amending Directive (EU) 2024/1712), require that victims of trafficking in human beings have an effective opportunity to obtain compensation for the harm they have suffered. As a result of these obligations, the right to compensation has increasingly been understood as an integral part of victims' fundamental and human rights, rather than merely as an ancillary element of the criminal process.

2. strengthen the criminal justice response to human trafficking, and in particular:

- ensure that human trafficking offences are proactively and promptly investigated, making use of special investigation techniques in order to gather material, documentary, financial and digital evidence, so that there is less reliance on testimony by victims or witnesses;
- ensure that human trafficking offences, including for the purpose of labour exploitation, are classified as such every time the circumstances of a case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted;
- ensure that the length of court proceedings in human trafficking cases is reasonable, in line with the case-law of the European Court of Human Rights (related to Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ) (paragraph 102);

Trafficking in human beings is not always identified as such; instead, acts may be investigated in practice under other less serious criminal classifications, such as extortionate discrimination at work, pandering or aggravated pandering in cases of sexual exploitation and extortionate work discrimination in work-related cases. In addition, investigations frequently proceed as work discrimination, extortion, illegal threat, assault, or criminal deprivation of liberty, because proving the full elements of trafficking in human beings (such as control, abuse of a vulnerable situation, and purpose of exploitation) is demanding and the lesser offences are easier to establish. In these cases, the compensation awarded to victims often remains significantly lower. To address this, the expertise of authorities has been strengthened. Specialized training on trafficking in human beings has been provided to police officers, prosecutors, and judges, and prosecutors with specific expertise in trafficking cases have been appointed nationwide. The distinction between trafficking in human beings and less severe criminal offences is also sought to be emphasized through Government Proposal HE 21/2026 vp, which clarifies the punishability of work-related exploitation that is less serious than human trafficking.

Training of police officers and prosecutors has been strengthened. A training programme for police officers, prosecutors, and pre-trial investigation authorities on identifying different forms of

trafficking in human beings places particular emphasis on situations in which offences have previously been investigated under less serious criminal classifications (such as pandering or extortionate discrimination at work) instead of trafficking in human beings. The objectives of the training are to identify suspected trafficking offences at an earlier stage of the pre-trial investigation; shorten the duration of pre-trial investigations; and to improve the recognition of evidentiary thresholds. National Prosecution Authority has organised a two-day basic training course on trafficking in human beings and a case day focusing on current phenomena in 2023-2025. The training has been attended by 118 prosecutors and 48 stakeholder representatives from the police, courts, the Border Guard and the Ministry of Justice.

A key reform has been the specialization of investigations into trafficking in human beings. A national investigative structure focusing on trafficking offences has been established and consolidated within the National Bureau of Investigation (NBI), supporting local police departments particularly in large-scale and complex cases. This has improved national and international cooperation and enabled more effective investigation of demanding financial evidence and cross-border trafficking cases. The Finnish police have continued to maintain and strengthen this nationwide specialized investigative structure on trafficking in human beings, which was initially established earlier but has been further developed since 2023.

The Finnish Border Guard has been given new powers concerning the prevention and investigation of human trafficking offences and money laundering offences as of 1 September 2025. As a result of the legislative amendments, the Finnish Border Guard may also prevent and investigate human trafficking offences that are not connected to the facilitation of illegal entry.

The National Bureau of Investigation (NBI) supports local police departments, coordinates international investigations, and maintains a nationwide situational picture of trafficking in human beings.

The police have conducted several extensive and multi-year pre-trial investigations making use of financial investigations, covert intelligence-gathering methods, and cross-border cooperation (for example with the Swedish police and Europol).

Pre-trial investigations completed by the National Bureau of Investigation in 2024–2025 have focused, in particular, on forcing victims into criminal activities and on economic exploitation.

One of a most significant recent developments has been the publication in 2024 of the *Handbook on the Pre-Trial Investigation of Trafficking in Human Beings* by the Police University College. The aim of the handbook is to harmonize police pre-trial investigation practices nationwide; emphasizes a victim-centered approach (including trauma-informed interviewing, interpretation services, and safety considerations); provides guidance on investigating new forms of trafficking (such as forced marriage, and online environments); and clarifies cooperation with prosecutors and the National Assistance System for victims of trafficking. The handbook has been incorporated into police training programmes and practical investigative work.

Police investigations into trafficking offences have further developed from a financial perspective. Human trafficking is now more clearly understood as an economic crime, with particular focus on criminal proceeds, financial gains derived from forced labour, and victims' loss of earnings.

Investigations increasingly apply a systematic “follow the money” approach. Since its establishment in 2021, the national specialized investigation unit for human trafficking offences has consolidated its role and supports local police departments in investigating large-scale and economically significant trafficking cases, as well as in tracing criminal proceeds. The position of victims of human trafficking as recipients of compensation has been improved by an earlier identification of victims.

The development of the criminal justice process aims not only to increase the number of convictions but also to improve victims’ ability to present compensation claims. However, criminal proceedings are often lengthy and burdensome, which reduces many victims’ willingness or capacity to pursue their rights within the criminal process.

The criminal justice system has also been developed in a way that increasingly systematic financial investigations are conducted in cases of trafficking in human beings. The purpose of these investigations is to trace and confiscate criminal proceeds, which supports victims’ opportunities to obtain compensation and strengthens the overall effectiveness of the criminal sanctions system.

In recent years, efforts have been made to systematically strengthen the criminal-law position of victims of trafficking in human beings through the development of legislation, pre-trial investigation practices, and the specialization of authorities. The aim has been both to enhance the effective enforcement of criminal liability and to ensure that victims of trafficking are afforded fair and effective legal protection in accordance with Article 6 of the European Convention on Human Rights.

In addition, the application of the provisions on trafficking in human beings in the Criminal Code has been clarified through legislative amendments. For example, forced marriage has been explicitly defined as a purpose of trafficking in human beings (entered into force on 1 January 2025), which has improved the predictability of legal practice and facilitated the correct classification of offences. Forced marriages have emerged as one of the most common forms of human trafficking, often also linked to so-called honour-related violence. Victims of forced marriage are entitled to protection and to services provided by the National Assistance System. A victim may also be granted a residence permit in Finland for a reflection period.

The cooperation between the police and the Prosecutors has been improved already at the early stages of pre-trial investigations, expanding networks of prosecutors specialized in trafficking in human beings, and strengthening the training of judicial personnel on trafficking offences. The purpose of these measures has been to shorten overall processing times and to prevent excessively lengthy proceedings, which may undermine victims’ legal protection and their motivation to participate in the criminal process.

The cooperation between the police and the National Assistance System for victims of trafficking in human beings has been further strengthened, including that the police refer victims to the National Assistance System at an earlier stage, which also supports the pre-trial investigation. Approximately 80% of clients of the National Assistance System cooperate with the pre-trial investigation authorities, which improves the availability and quality of evidence and the National Assistance System provides the police with consultations concerning the victim’s status and safety. This cooperation has proved to be particularly important in situations where the victim is fearful, in a vulnerable situation, or dependent on the perpetrator.

The classification of labour exploitation as trafficking in human beings has been improved. The Action Plan against labour exploitation for 2024-2027 was approved in February 2024. One challenge was identified whereby serious exploitation has previously been investigated under less severe criminal classifications, such as extortionate discrimination at work. This has been addressed by increasing training for police officers and prosecutors on the constituent elements of trafficking in human beings and by emphasizing the use of the correct criminal classification already at the early stages of the pre-trial investigation, particularly in cases of labour exploitation. The distinction between trafficking in human beings and less severe criminal offences is also sought to be emphasized through Government Proposal HE 21/2026 vp, which clarifies punishability of work-related exploitation that is less serious than trafficking in human beings.

Furthermore, the Government Proposal HE 198/2025 vp has been submitted to Parliament. The Proposal seeks to enable information exchange in order to strengthen measures against labour exploitation and trafficking in human beings. The Proposal includes legislative amendments that would enable the Finnish Tax Administration and the National Enforcement Authority to disclose information on their own initiative, with a view to enhancing the prevention of labour exploitation and trafficking in human beings. There is an ongoing legislative project to enable the Finnish Immigration Service to disclose information on its own at the initiative at the Ministry of the Interior.

The reasonable length of judicial proceedings and the requirements established in the case-law of the European Court of Human Rights have been addressed by improving cooperation between the police and prosecutors at the early stages of pre-trial investigations, expanding networks of prosecutors specialised in human trafficking, and strengthening the training of judicial personnel on human trafficking offences.

In addition, several legislative amendments have been adopted recently or will be adopted in the near future to speed up and streamline the criminal procedure in accordance with the Government Programme. The aim of these measures has been to shorten overall processing times and to prevent protracted proceedings, which may undermine victims' legal protection and their motivation to participate in the criminal justice process. The position of victims of human trafficking as recipients of compensation has also been improved through earlier identification and the strengthening of their status as injured parties in criminal proceedings. The nationwide Police Guideline revised in 2020 obliges authorities to identify victims of trafficking and refer them to the National Assistance System for Victims of Trafficking in Human Beings. This referral has been a prerequisite for access to effective legal aid and for the practical ability to submit compensation claims.

Victims of trafficking can receive support without filing a criminal complaint or participating in a pre-trial investigation or court proceedings. The victim has the right to protection, safe housing, and support solely on the basis of their need for assistance.

The EU Directive ((EU) 2024/1260) that entered into force in 2024 includes new rules on compensation of victims and enhances the tracing and confiscation of criminal proceeds for the benefit of victims. This reflects a broader shift in which compensation is viewed as part of victims' fundamental rights rather than merely as a by-product of the criminal justice process.

State compensation for victims of crime therefore acts as an essential safety net. Because perpetrators of trafficking offences are often insolvent or located abroad, compensation ordered

against offenders frequently remains unpaid. The Criminal Injuries Act (1204/2005) allows victims – with certain restrictions - to obtain compensation from the state when damages caused by a criminal offence cannot be recovered from the perpetrator.

In recent years, it has been recognized that victims of trafficking often do not apply for criminal injury compensation due to a lack of information, language barriers, or the complexity of the application process. As a response, guidance provided by legal aid offices has been developed, and the role of the National Assistance System for Victims of Trafficking in Human Beings, as well as that of civil society organizations, has been strengthened in supporting victims throughout the application process. As such, the development of the right to compensation has increasingly focused on practical accessibility, not only on legislative reform.

The National Assistance System for Victims of Trafficking in Human Beings, operating in connection with the Finnish Immigration Service, has emerged as a key actor also from the perspective of compensation. Although the system itself does not grant monetary compensation, it plays a central role in supporting victims in understanding their rights, participating in criminal proceedings, and accessing legal aid. In addition, the National Assistance System provides accommodation, subsistence support, health care, and psychosocial assistance; supports victims in participating in criminal proceedings; and helps to mitigate legal risks faced by victims, such as the risk of removal or deportation. The National Assistance System in practice functions as a form of de facto advance protection comparable to preliminary compensation and also a prerequisite enabling victims to pursue compensation through legal channels.

The number of victims referred to the National Assistance System increased between 2015 and 2025, correlating with improved identification of victims and an increase in criminal proceedings. However, the amounts of compensation awarded have not increased at a corresponding rate.

Research and consultations with experts by experience have shown that long-term, trust-based support is often a prerequisite for victims to feel able - and empowered - to seek compensation. In this sense, the right to compensation is closely intertwined with victims' broader support and recovery processes.

One of the key challenges in developing the right to compensation lies in moving from norms and strategies toward concrete solutions that function in victims' everyday lives. The updated assistance system seeks, in part, to address this need.

3. Review the application of the Dublin Procedure to presumed victims of human trafficking and conduct risk assessments in order to prevent victims being returned to the country where they first applied for asylum, but where they face the risk of being re-trafficked (paragraph 183);

The application of the Dublin procedure has been safeguarded from the perspective of protecting victims of human trafficking by conducting individual risk assessments, strengthening the identification of victims of human trafficking in the asylum procedure, applying the sovereignty clause where necessary, applying the principle of non-refoulement also to transfers within the EU and complying with the case-law of the European Court of Human Rights. These measures aim to

ensure that the protection of victims of human trafficking is not overshadowed by formal responsibility rules, but that human rights remain at the core of the application of the Dublin procedure.

The application of the Dublin procedure has been developed in recent years so that the human rights and specific vulnerabilities of victims of human trafficking are taken into account more effectively than before. At the core is the principle that no one may be transferred to another EU Member State if the transfer would expose the person to a real risk of being subjected again to human trafficking or other serious exploitation. The Dublin procedure is based on the principle of mutual trust between Member States. Accordingly, the EU Member States are expected to comply with EU law and international human rights obligations. However, this principle does not remove the obligation to assess whether the transfer of an applicant could result in treatment contrary to Article 4 of the Charter of Fundamental Rights in the receiving Member State. A key instrument is an individual and case-by-case assessment. The Finnish Immigration Service does not issue Dublin transfer decisions automatically; instead, it is required to assess the applicant's personal circumstances. The special situation of a victim of human trafficking or the applicant's vulnerable status does not automatically prevent a transfer to the Member State responsible for examining the asylum application. The applicant's circumstances are assessed individually in each case, and the provisions of Article 4 of the Charter of Fundamental Rights are taken into account. In addition, the requirements for granting a residence permit under Section 52 a of the Aliens Act (301/2004) are taken into account in the processing of the case.

The procedure reflects the case-law of the European Court of Human Rights, according to which authorities have an active obligation to assess risks prior to a transfer, and the applicant is not required to prove the danger alone.

In addition, the identification of victims of human trafficking has been strengthened as part of the asylum procedure. Staff of the Finnish Immigration Service have been trained to identify indicators of human trafficking already at an early stage of the application process. If an applicant is identified as a victim or a potential victim of human trafficking, they may be referred to the National Assistance System for victims of human trafficking.

Identification also functions as a so-called protective mechanism. If there is an indication of human trafficking in the matter, the processing of the application also assesses the conditions for granting a permit under section 52a of the Aliens Act, as well as the conditions for granting a permit under section 52 of the Aliens Act (granting a residence permit on individual humanitarian grounds).

Finland makes use of the discretion provided under the EU Dublin Regulation (the so-called sovereignty clause) in situations where returning a victim of human trafficking to the responsible Member State would be unreasonable or unsafe. This means that Finland may decide to examine the asylum application itself, even if another Member State would formally be responsible. Being a victim in the responsible Member State does not in itself prevent transfer; rather, the applicant's individual circumstances and the risk under Article 4 of the Charter are assessed. In addition, the principle of mutual trust between Member States is taken into account in this case.

The applicable procedure is grounded in the principle of non-refoulement, which is binding under both international law and EU law. Returning a victim of human trafficking to a situation where there

is a real risk of renewed exploitation is considered contrary to the principle of non-refoulement. This principle is also applied to Dublin transfers between EU Member States.

In its case-law, the European Court of Human Rights has emphasized that a serious human rights risk, such as human trafficking and the associated coercive control, may constitute an obstacle to transfer even within the European Union. Finland has taken these principles into account in its administrative decision-making.

4. Take further steps to comply with the obligations under Article 12 of the Convention and ensure that all victims of trafficking, including men, are provided with accommodation that is safe and suitable for their needs (paragraph 200);

The implementation of Article 12 of the Convention is primarily built around the National Assistance System for victims of human trafficking. The system operates in connection with the Finnish Immigration Service, and its tasks are based on legislation (the so-called Reception Act).

In accordance with Article 12 of the Convention, it is essential that responsibility for assistance lies with public authority rather than discretionary project-based funding; that a victim may be admitted to the system regardless of gender, age, or residence status; and that accommodation is one of the primary and urgent forms of support.

In practice, safe and needs-based accommodation for adult victims (women, men, and non-binary persons) is arranged in a decentralized and case-by-case manner. The available accommodation options include, inter alia, supported housing, and, where necessary, emergency accommodation. When determining housing arrangements, an assessment is made of security risks (such as the risk of being located by perpetrators), the victim's gender and need for privacy, as well as their physical and psychological condition. Accommodation arrangements are the same for men and boys and for women and girls, but they are not placed together.

For minors, the principle of the best interests of the child is applied as a primary consideration. If a victim of human trafficking is an unaccompanied minor asylum seeker, they are generally accommodated in units designated for minors. In addition, if necessary, a child welfare notification is made, and the child welfare authorities then assess the need to place the child elsewhere as a child protection measure. In addition, child protection services and the National Assistance System operate in close cooperation. Boys who are victims of human trafficking are afforded exactly the same level of protection as girls. In addition,

A gender-neutral and non-discriminatory approach requires gender-neutral legislation and guidance, which is the case in Finland. Furthermore, training within the National Assistance System places particular emphasis on labour exploitation, forced criminal activity, and the specific characteristics of male victims, and accommodation services are not limited to "services for female victims."

The provision and development of safe and long-term accommodation solutions have been taken into account in the updated Action Plan against Human Trafficking for 2026–2027, inter alia, by incorporating accommodation services and strengthening the division of responsibilities between

wellbeing services counties and the state. In particular, the accommodation of male victims and victims with multiple and complex needs continues to require additional resources. Housing is not merely a temporary solution, but a central component of victims' safety, recovery, and the realization of their human rights.

5. Take additional measures to prevent trafficking of children, identify child victims of trafficking and provide appropriate assistance to them, and in particular:

- take further actions for reducing the risk of children going missing from state care, by sensitising them to the risks of human trafficking and sexual abuses and providing them with secure accommodation, appropriate services and a sufficient number of appropriately trained supervisors;
- ensure that relevant actors take a proactive approach and increase their outreach work to identify child victims of trafficking; by paying particular attention to children absconding from institutional care, children trafficked for forced criminality, unaccompanied children and children recruited and/or exploited online (paragraph 210);

The updated Action Plan against Human Trafficking for 2026–2027 focuses on the prevention of and response to human trafficking related to sexual exploitation, children and young persons, forced marriage, youth and gang-related crime, as well as organised crime, and on improving the identification of these phenomena, particularly with regard to human trafficking affecting children and young persons.

The Barnahus project has trained professionals in identifying of human trafficking involving children, new forms of trafficking, research-based information and the characteristics of the offence. Trafficking in children attracted interest during the Child Crime Investigation Days, which led to requests for training on the subject for a wider audience later that year. The discussion showed that professionals have difficulties in applying the indicators of human trafficking in cases involving crimes against children.

Trafficking in human beings online, in particular, was identified as a topic on which more information was needed. At the request of the participants, another open event with the same content was held in 2024.

The Barnahus project has also provided training for child welfare professionals on protecting children and young persons who go missing from substitute care from human trafficking and violence. These children and young persons are referred to in Finnish as “hatka” youth. The training covered a trauma-informed approach to work and ways to determine what had happened to the young persons while they were away. The webinar also examined factors related to children and young persons going missing from care and ways to prevent this.

The Hatka project, which focused on children and young persons leaving substitute care without permission and not returning, continued until the end of 2024. The project produced information on the following topics: Hatka in Finland – Towards a national situational picture of children missing from substitute care in child welfare; Hatka Finland II – Situational picture of children missing from substitute care placements in child welfare and national action proposals; and Hatka Finland III –

The Return from Hatka method. In addition, more than 20 theses on the subject were completed during the project. Hundreds of professionals participated in the project.

To identify the risk of radicalization and coercion (gang violence) a RATTI tool has been developed. RATTI is suitable for supporting preventive work in situations where there has been a heightened concern about a possible susceptibility to violent radicalisation. It has been developed to help a professional when assessing an individual's need for support. The tool also makes the blind spots of information visible and helps to identify what kind of multi-professional work could be done on a case-by-case basis in the future. In addition, the RATTI tool also includes questions related to honor violence and coercive control to help the professional work.

The Protect Children Association (Suojellaan lapsia ry) translated into Finnish a guide prepared by the Royal Canadian Mounted Police (RCMP) describing the activities of Violent Online Communities ("The Com") to identify the activities of violent online communities and to promote the safety of children and young persons online. There have also been indications of activity in Finland. In particular, these online communities seek out children and young persons in vulnerable situations and target them with violence on online platforms popular with children and young persons. The guide was introduced in Finland by the police and through the Barnahus project.

In the Safe Streets project, a checklist has been developed to support discussions with young persons returning after having gone missing from substitute care. The tool is currently being piloted in two units of the State Residential Schools. Additional supporting material is being prepared. The developed tool was presented at a seminar on 7 May 2026, and a recording was made to support familiarization with the tool. Supporting background material is currently being prepared and will be completed in June.

The Safe Streets project is developing a tool to support professionals in identifying and addressing harmful and criminal experiences that may occur during children's unauthorized absences. The tool will include a checklist and supporting materials to guide encounters with children returning from absence.

The approach is structured around four key steps: ensuring the child's immediate safety and wellbeing, identifying possible experiences such as violence or criminal activity, assessing the need for further actions (including potential reporting to the police), and stabilizing the situation through safety planning and supporting the return to everyday routines.

The work emphasizes an empathetic, non-blaming approach and the importance of individual assessment in each case.

In cooperation with the National Police Board, the National Prosecution Authority and the Police University College, the Barnahus project will organise a training day on child crime investigation in 2026. One of the themes will be different types of victims of crime, including hard-to-reach complainants. According to our assessment, victims of human trafficking may also be found among hard-to-reach victims who, for various reasons related to their background or circumstances, do not dare or do not wish to report the crimes they have experienced. Approximately 160 participants have registered for the event so far. In the programme, human trafficking affecting children and young persons is treated as a separate priority area, including prevention, early identification,

assistance to victims and strengthening the competence of authorities. The Action Plan has been updated, and its implementation is monitored regularly.

The National Assistance System for victims of human trafficking, operating in connection with the Finnish Immigration Service, provides minor victims with, inter alia, safe accommodation, social and healthcare services assistance in obtaining legal aid, and psychosocial support. Assistance is not dependent on the child's residence status or the progress of criminal proceedings, and the best interests of the child are a primary consideration.

The identification of victims has been improved, inter alia, by imposing an obligation on authorities (social and healthcare services, the police, border authorities, and schools) to submit a child protection notification and, where necessary, a criminal report. In addition, guidelines, manuals, and training have been developed for professionals with the aim of improving the identification of child trafficking, particularly in situations where a child is at risk of exploitation, is forced into criminal activity, or goes missing from substitute care ("runaway" children).

In addition, the Finnish Institute for Health and Welfare (THL) has provided an online training course titled "Human trafficking as a phenomenon encountered in health and social services". The course had been completed by approximately 700 professionals and other participants before spring 2026, and by a further 54 participants following its update in spring 2026 as part of the "Agency – services that promote equity, antidiscrimination, and participation" project.

Furthermore, Finland invests in prevention through, for example, safety skills education, media and digital literacy education in schools, support for parents and families, and services for children and young persons in vulnerable situations. Non-governmental organisations (such as Save the Children Finland and the Deaconess Foundation) play a key role in prevention and support services.

Event	Topics	Professional groups participating in the training		Number of participants
Consultative Days on Child Crime Investigation 2024	Child trafficking as a criminal offence: investigation and cybercrime in human trafficking	Professionals in social and healthcare services, police (child crime investigation), police administration, and prosecutors		around 160
Webinar: Human Trafficking Affecting Children (2024)	Child trafficking as a criminal offence: child interviews, online-facilitated trafficking and	Social and healthcare professionals, police officers, prosecutors, immigration workers, Victim Support Finland,		around 320

	emerging phenomena, and the roles of child protection and prosecutors.	non-governmental organisations, and private child welfare service providers		
Encountering Young Persons Who Have Experienced Violence in Child Welfare Institutions (recording available on THL's YouTube channel, with a link to the recording on the barnahus.fi website)	Trauma-informed interaction, cooperation with the police, unauthorised absence from a child welfare institution and return (runaway episodes).			

Training in trauma treatment methods for professionals working with children (TF-CBT) since 2023

Training Year	Number of participants
2023	2024
Participants in international training programmes 2023-2024	17

6. Take additional measures to ensure that victims of trafficking can fully benefit from the right to obtain a residence permit, including on grounds of their personal situation, by amending the Aliens Act, providing the relevant staff of the Immigration Service with additional instructions and training, and ensuring the issuing of residence permits within a reasonable time (paragraph 224).

Since GRETA's visit to Finland in May 2023, the development of the Aliens Act has not consisted solely of tighter requirements. Instead, the residence permit for victims of human trafficking has been clearly protected as a special provision; the reflection period has been strengthened into a genuine legal safeguard; access to a continuous residence permit on vulnerability grounds has been reinforced; derogation provisions from passport, maintenance, and place-of-application

requirements have remained in force; and the role of the National Assistance System has been strengthened.

The combined effect of these changes is that victims of human trafficking now have a more realistic and more human-rights-based opportunity to obtain a residence permit in Finland, even in situations where other entry and residence regulations have become more restrictive.

The legal significance of the reflection (recovery) period was addressed in the Government Proposal HE 143/2024 vp. It was confirmed in the explanatory notes to the Proposal that a victim of human trafficking is considered to be lawfully residing in Finland during the reflection period, even if the person has no other residence status, and that if a residence permit application is submitted while the reflection period is valid, the applicant is entitled to remain lawfully in Finland for the duration of the processing of the application.

The possibility of granting a continuous residence permit to victims in vulnerable situations has been retained and clarified. Under section 52 a of the Aliens Act, a temporary residence permit may be granted in connection with criminal proceedings, while a continuous residence permit may be granted if the victim is in a particularly vulnerable situation, and the granting of a continuous permit does not require cooperation with the authorities or the progress of criminal proceedings. In addition, in recent years the assessment of vulnerability has been strengthened, guidance for decision-making has been enhanced, and efforts have been made to reduce previously possibly identified regional and case-specific inconsistencies. In this respect the Finnish Immigration Service's new guideline on human trafficking phenomena was completed in March 2026. The purpose of the guideline is to serve as a daily tool for caseworkers at the Finnish Immigration Service and to provide guidance for the consistent application of the Aliens Act in situations where there may possibly be a victim of human trafficking. In addition, the guideline aims to support prompt decision-making, equal treatment of applicants, and the proper implementation of the duty to negotiate and the service principle within the agency.

Flexibility with regard to passport and maintenance requirements has been retained for residence permits granted to victims of human trafficking. This means that the absence of a passport does not prevent the granting of a permit, there is no requirement to demonstrate means of support, and the person granted the permit receives an unrestricted right to work. This lowers the threshold for applying for a residence permit, particularly for victims who are leaving situations of exploitation.

The link between the National Assistance System and the residence permit procedure has been strengthened. The National Assistance System for victims of human trafficking plays a key role in granting the reflection period and supports victims in the residence permit application process, and the victim assessments it produces now carry greater weight in decision-making than before. In practice, this particularly improves the legal protection of victims in vulnerable situations, undocumented victims, and minors.

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