

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



CP(2025)09

**Report submitted by the authorities
of Iceland
on measures taken to comply with
Committee of the Parties Recommendation
CP/Rec(2023)09 on the implementation
of the Council of Europe Convention
on Action against Trafficking in Human Beings**

Third evaluation round

Received on 15 December 2025

Ce document n'est disponible qu'en anglais

**Report submitted by the authorities of Iceland on
measures taken to comply with Committee of the Parties
Recommendation CP/Rec(2023)09 on the implementation
of the Council of Europe Convention on Action against
Trafficking in Human Beings by Iceland**

Third evaluation round

Right to information (reply to para. 43 and 44)

Authorities are currently looking into translating the leaflet on human trafficking to the languages of the main countries of origin of presumed victims, that is; Spanish, Arabic, Ukrainian, Fillippian and Vietnamese.

Legal assistance and free legal aid (reply to para. 55)

In 2024, the Bar Association offered a seminar on human trafficking, its manifestations and how lawyers can assist victims of human trafficking within the system. The training was provided by a lawyer who participated in a human trafficking simulation training organized by the OSCE and the Council of the Baltic Sea States.

Psychological assistance (reply to para. 59)

Bjarkarhlíð, who coordinates operations in human trafficking cases under an agreement with the Ministry of Justice and the Ministry of Social Affairs and Housing, provides counselling and support to victims of human trafficking, tailored to individual needs. These needs vary significantly: victims of labour exploitation are generally less likely to accept counselling, while victims of sexual trafficking are more likely to do so.

One key partner is Domus Medica Health Clinic, which offers health care to applicants for international protection and runs a temporary project for trafficking victims. Through this cooperation, Bjarkarhlíð can book appointments for clients, including psychological treatment. The trauma team at Landspítali University Hospital accepts referrals from Bjarkarhlíð for incidents occurring within the past month. Survivors with residence permits and public health insurance can access trauma therapy through the hospital if referred by their general practitioner. Victims of sexual trafficking also have access to counselling and group therapy at Stígamót, a partner organization of Bjarkarhlíð.

To promote social inclusion, Bjarkarhlíð collaborates with NGOs such as the Salvation Army and the Red Cross, offering volunteer work and social activities. Reykjavík social services provide Icelandic lessons. Bjarkarhlíð continues to build partnerships to expand social activities and opportunities for personal development and inclusion.

Access to work, vocational training and education (reply to para. 63)

The Directorate of Labour has taken proactive measures, particularly following the “Vietnam Case” in 2024 where the agency assisted victims of labour trafficking and exploitation in finding employment. This initiative proved highly successful, with numerous

victims seeking help after the operation. As a result, the project has become a permanent part of the Directorate's services.

The program continues to support potential victims of human trafficking in their job search. It is implemented through collaboration between the Directorate's refugee team and work permit division, with additional support from the Directorate of Immigration. The latter provides guidance on residency rights, and the appropriate type of residence permits for victims.

Compensation (reply to para. 79)

Financial investigation is a central part of every trafficking investigation, and the Reykjavík Metropolitan Police consistently applies a "follow the money" approach. The aim is twofold: first, to gather evidence of the exploitation itself (such as excessive working hours, unpaid wages and unlawful deductions), and second, to support compensation claims in court and ensure that victims can effectively recover their losses.

In one large labour trafficking investigation, the "Vietnam Case," the Reykjavík Metropolitan Police systematically collected evidence on the time the victims spent at work, including work schedules, time sheets, as well as statements from co-workers and customers. On this basis, investigators reconstructed the actual working hours over a prolonged period and compared them to the wages they received, applicable collective agreements and statutory minimum standards. This allowed the Reykjavík Metropolitan Police to calculate the unpaid wages and other financial loss for each victim, as well as the unlawful financial gain for the suspects. The same material is used both to prove the exploitation in the criminal case and to substantiate the victims' compensation claims before the court, alongside requests for seizure and confiscation of assets.

The Reykjavík Metropolitan Police has been in good co-operation with The Icelandic Confederation of Labour Unions and the lawyers working for them on making a claim for wage losses to the Wage Guarantee Fund in Iceland.

During the aforementioned Vietnam Case, concerning labour exploitation of over 30 Vietnamese citizens working in several restaurants and hotels, a hotel building owned by one of the defendants was frozen under an order issued by the District Commissioner at the request of the Reykjavík Metropolitan Police. It is believed that that the building was bought for 490 million Icelandic Kronas, corresponding to approximately EUR 3.3 million. With the permission of the Reykjavík Metropolitan Police, the building was sold to an unrelated third party and the profits were seized before paid out. That way the building will not by any chance be owned by the perpetrators or anyone connected to them, since the perpetrators tried to start the business again, after the investigation began.

A Training Committee on Trafficking in Human Beings has been established under the auspices of the Centre for Police Training and Professional Development of the National

Commissioner of the Icelandic Police. The committee is composed of three police officers, one prosecutor and one criminal investigator from the Reykjavík Metropolitan Police, and one prosecutor from the Suðurnes Police Department. When determining the training content for police officers and prosecutors, the committee will consider the recommendations and observations of GRETA and other monitoring bodies concerning anti-trafficking measures.

In December 2025, the Training Committee will organize an 8-hour training course for police officers in Iceland, with 34 participants registered.

Investigations, prosecutions, sanctions and measures (reply to para. 97)

Since 2023, the Icelandic authorities have significantly strengthened the specialised police capacity for investigating trafficking in human beings and prostitution. The number of posts in the investigation unit dealing with these offences has been increased by four, with a further post planned. The unit has also been merged with the Financial Intelligence Unit (FIU) to reinforce the financial and analytical aspects of investigations and is intended to strengthen the capacity to conduct complex, labour-intensive and finance-driven investigations. Targeted training activities have been carried out, including the 8-hour national training course for police officers in December 2025 organised by the Training Committee on Trafficking in Human Beings. Both prosecutors and police-investigators have attended conferences held by CBSS, Europol and the Nordic Council of Ministers and meetings regarding operational projects by Europol.

As a result of these changes and reinforcements, cases which previously might not have been investigated as trafficking are now systematically assessed under the THB provision. Every case entering the unit is analysed using trafficking indicators and discussed with a specialised prosecutor, with a view to ensuring that THB offences are classified and prosecuted as such whenever the legal criteria are met.

Increased emphasis has been placed on the use of special investigative techniques and other proactive measures in THB cases, with the aim of collecting strong material, documentary, financial and digital evidence and thereby reducing reliance on victim or witness testimony alone. In serious and complex cases, investigators make use of techniques such as covert surveillance, analysis of communications data (subject to judicial authorisation), financial investigation (including bank records, company documents and tax information) and digital forensics.

A dedicated Cyber Crime Unit has been established within the Reykjavík Metropolitan Police, staffed with specialists in securing and analysing digital evidence. This unit supports trafficking investigations by, inter alia, preserving and examining electronic devices, social media content, messaging applications and other online platforms used for recruitment, control and exploitation of victims.

Bjarkarhlíð coordinates operations in human trafficking cases under an agreement with the Ministry of Justice and the Ministry of Social Affairs and Housing. Collaboration between labour unions, the Directorate of Immigration, the Directorate of Labour, Bjarkarhlíð, the police, and Reykjavík social services has proven highly effective over the past two years. A notable example is the “Vietnam Case,” a major investigation involving a Vietnamese restaurant chain and labour trafficking in the Icelandic labour market, which is still ongoing.

As part of the new National Action Plan for Combating Trafficking in Human Beings the Ministry of Justice will look consider amendments to the article on trafficking in human beings in the General Penal Code so that it better aligns with the provisions of the Convention.

Non-punishment provision (reply to para. 101)

As part of the new National Action Plan for Combating Trafficking in Human Beings, particular attention will be given to the potential inclusion of a non-punishment provision within Iceland’s legal framework.

Protection of victims and witnesses (reply to para. 107)

In the draft of the first National Action Plan Combatting Gender-Based Violence Against Women, which is currently in public consultation, there is an action on ensuring protection of victims of gender-based violence. To ensure the protection of victims of gender-based violence during court proceedings, all court buildings will be equipped with teleconferencing facilities in appropriate and secure settings. Victims will be able to provide testimony without being in the physical presence of the defendant, while the defendant will still be able to follow the proceedings from within the building. Measures will also be put in place to guarantee that victims do not encounter defendants in front of or within court premises. The fourth National Action Plan for Combating Trafficking in Human Beings will encompass an action built on this action in the National Action Plan Combatting Gender-Based Violence Against Women.

Specialised authorities and co-ordinating bodies (reply to para. 115)

Bjarkarhlíð’s core responsibilities include, inter alia, educating service providers. The centre has provided lectures and group discussion sessions to various stakeholders, including Reykjavík Municipality. The coordination specialist also participated in a workshop in the police science program at the University of Akureyri, where students (future police officers) worked on a simulated human trafficking case. Bjarkarhlíð additionally facilitated a seminar for all frontline workers delivered by IOM this year, which was held in Reykjavík.

International co-operation (reply to para. 121)

Over the past two years, Iceland has emphasized international cooperation in the fight against trafficking in human beings. For example, the government supported an OSCE side event highlighting the contributions of small states to eradicating trafficking in Europe. Frontline actors have sought education and conferences abroad.

During Iceland's chairmanship of the Nordic Coordinators' Working Group in 2023, a two-day international conference was hosted and attended by over 150 professionals. A Nordic police cooperation initiative was also launched, enabling the exchange of information and experiences on emerging THB trends and methods used by organized crime groups.

Another milestone was the appointment of Iceland's first Liaison Prosecutor at Eurojust in 2024, strengthening cross-border prosecution and combating organized crime.

In 2026, Iceland will assume the chairmanship in the Council of Baltic Sea States, including leadership of its Task Force on Trafficking in Human Beings.

The role of businesses (reply to para. 130-132)

The Public Procurement Act No. 120/2016 was amended in 2024 (Act No. 64/2024) to explicitly authorize main contractors and subcontractors to request pay slips, time sheets, and summaries of health and accident insurance. This ensures compliance with the chain liability provision. Because this information is subject to privacy laws, a clear legal basis was necessary; without it, main contractors and, where applicable, purchasers could not fulfill their obligations under the provision. The amendment also expanded the scope of chain liability from works contracts to include contracts for goods and services.

Further amendments to the Public Procurement Act will align with the legal framework of the European Economic Area (EEA). The European Union has announced plans to revise its Public Procurement directives in 2026, and these changes will subsequently be implemented in the EEA, including Iceland. Iceland participates in the Expert Group on Public Procurement (EXPP), where the inclusion of social requirements in public procurement is currently under review.

Developments in the legal, institutional and policy framework for action against trafficking in human beings (reply to para. 21 and 26)

For various reasons, the fourth National Action Plan for Combating Trafficking in Human Beings has not yet been launched. Authorities remain firmly committed to ensuring its effective implementation, and the plan will be a key priority in 2026. A detailed timeline has been established for its development, beginning with a stakeholder consultation in January. The recommendations of GRETA will be carefully considered during the drafting process.

The bodies responsible for the action plan's implementation will be able to apply for funding through a special fund within the Ministry of Justice intended for the implementation.

Funding from the State budget to action against THB has increased significantly in the past two years.

In 2023, 500 million Icelandic Kronas were permanently added to the police budget to strengthen efforts against organized crime, including trafficking. This year, 50 new officers were added nationwide. Since 2023, the number of posts in the investigation unit within the Reykjavík Metropolitan Police dealing with trafficking in human beings and prostitution has been increased by four, with a further post planned.

In 2024, the government funded for the first time, a position of a coordinating specialist at Bjarkarhlíð, the Family Justice Centre. This role focuses on coordinating initial responses and services for trafficking victims, educating professionals, and improving outreach – particularly to victims of sex trafficking. The specialist brings together experts from various institutions, fostering trust and collaboration.

In the context of developing the National Referral Mechanism, as outlined under 'Identification of Victims of Trafficking,' responsibility for the role of National Rapporteur on Trafficking in Human Beings will be assigned to a relevant body.

Data collection (reply to para. 138)

One of the actions in the new National Action Plan for Combating Trafficking in Human Beings will focus on strengthening data collection. This will involve ensuring the active participation of all relevant stakeholders, including NGOs and other service providers, law enforcement and immigration authorities, labour inspectorates, health-care professionals, prosecution services, and others engaged in identifying victims of trafficking, as well as investigating and prosecuting trafficking in human beings and related offences.

Measures to prevent and combat trafficking for the purpose of labour exploitation (reply to para. 150)

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

1. A new cooperation committee on measures against labour market crime was established, composed of representatives from government and labour market organizations. Ministers responsible for economic affairs, labour, taxation, policing,

- and law enforcement also sit on the committee. It must meet at least once a year in full representation and is tasked with proposing government policy and action plan on labour market crime, delivering a policy and actions plan to the minister of labour within one year after parliamentary elections. Work on this policy and action plan is in final stages, and we expect it to be completed by the end of the year. This action plan addresses among others some of the issues mentioned by GRETA. This action plan addresses some of the issues mentioned by GRETA, with actions among others related to closer cooperation between authorities to combat criminal activity in the labour market, more effective screening during the processing of work-permit applications for potential criminal activity or human trafficking and strengthening residence permits for victims or potential victims of human trafficking. There are also actions in connection with providing information and raising public awareness about the effects of underbidding and criminal activity in the labour market, including labour trafficking, and about the responsibility the public has in contributing to a healthy labour market.
2. A formal government agency cooperation platform was enshrined in law, continuing the arrangement that had existed since 2019 by agreement. This platform involves the police, the tax authority, and the Administration of Occupational Safety and Health (AOSH), which leads the cooperation. The platform strengthens and coordinates oversight activities, including joint operations, and establishes formal regular consultations with labour market organizations.
 3. Amendments to occupational safety legislation (Act No. 46/1980 on working conditions, health, and safety at workplaces) increased AOSH's powers to impose sanctions for serious violations of the law.
 4. Transfer of responsibilities for monitoring laws on posted workers, temporary work agencies, workplace ID cards, and workplace inspections from the Directorate of Labor to Administration of Occupation of Safety and Health. The purpose of this transfer was to make public labour market supervision more efficient, by consolidating all oversight under a single institution.

General awareness of trafficking for the purpose of labour exploitation has increased significantly over the past two years, driven in part by extensive media coverage of the previously mentioned "Vietnam Case."

Identification of victims of trafficking (reply to para. 163)

As previously stated, Bjarkarhlíð coordinates Iceland's response to human trafficking under an agreement with the Ministry of Social Affairs and Housing and the Ministry of Justice. In 2024, the first full-time trafficking coordinator was hired. The coordinator manages cases, convenes relevant agencies, and ensures victims receive appropriate support.

Bjarkarhlíð's core responsibilities include compiling relevant laws and guidelines, mapping institutional procedures, coordinating multi-agency responses, educating service providers,

and addressing GRETA's recommendations. When a trafficking case or suspicion arises, Bjarkarhlíð brings together key responders such as the police, municipal social services, the Directorate of Immigration, the Directorate of Labour, NGOs, and other partners. This collaborative, team-based approach has proven highly effective.

In addition, Bjarkarhlíð provides direct guidance to professionals and connects victims with resources such as education, employment assistance, and NGO programs. It actively participates in national and international forums on trafficking in human beings and continues to expand partnerships with municipalities with successful collaboration already established with Reykjavík's Welfare Department. Together, Bjarkarhlíð and Reykjavík Municipality have developed joint procedures that are activated when a suspected trafficking case arises.

When the new National Action Plan for Combating Trafficking in Human Beings has been drafted, the National Referral Mechanism will be further developed and formalised in close cooperation with all frontline actors who may encounter victims of trafficking, defining their procedures and roles.

At the Directorate of Immigration, all staff members involved in the asylum procedure are trained to recognize indicators of trafficking and to handle such cases with sensitivity and confidentiality. In cases where there is any doubt as to whether an individual may be a victim of human trafficking, staff members may seek advice and guidance from the specialized trafficking team within the Directorate of Immigration. The Directorate of Immigration strives to ensure that potential victims of trafficking are identified at the earliest possible stage and that their rights and safety are safeguarded throughout the asylum process.

The Directorate of Immigration always seeks to thoroughly assess any potential risks faced by individuals who may be victims of human trafficking prior to deciding on their return to another country, including the country where they first applied for asylum. In all such cases, an individual risk assessment is conducted to evaluate whether the person concerned may be exposed to re-trafficking, persecution, or other serious harm upon return. This assessment considers all relevant information, including personal circumstances, country of origin or previous residence conditions, and any available reports from international or domestic bodies. Where there are indications that return could expose an individual to a real risk of re-trafficking or other human rights violations, the Directorate of Immigration ensures that appropriate protection measures are applied in line with Iceland's international obligations. Through these procedures, the Directorate strives to guarantee that all decisions are taken with full regard to the safety and rights of potential victims of trafficking.

Assistance to victims (reply to para. 172)

Currently, Iceland does not have a shelter specifically designed for victims of human trafficking. The Women's Shelter provides safe accommodation for women and their children in Reykjavík and Akureyri, with no maximum stay limit. For several years, the Ministry of Social Affairs has maintained an agreement with the Women's Shelter to offer services to trafficking victims.

There is no equivalent shelter for men. Male victims are accommodated by social services in guest houses. In emergency situations or outside regular office hours, they may be temporarily housed in a reception centre for asylum seekers until social services intervene. When children are involved, Child Protection authorities are notified immediately to ensure their safety.

Measures to prevent trafficking of children, identify child victims of trafficking and assist these children

The National Agency for Children and Families has led a collaborative effort to introduce new improved guidelines for the identification and referral of unaccompanied minors with an emphasis on screening for suspected child victims of trafficking. These guidelines are aimed at frontline professionals and are a joint effort of the child protective system, Border police, The Directorate of Immigration, The Directorate of Labour and The National Police Commissioner. The guidelines are currently in the process of approval with relevant stakeholders and will be issued soon.

Amendments to the Child Protection Act No. 80/2002 will be proposed in parliament during the current session. The amendments represent significant legislative and procedural developments that directly address GRETA's concerns and strengthen overall response to child trafficking by embedding identification, referral, and protection mechanisms within the statutory child protection system.

The proposed amendments to Article 71 of the Child Protection Act establish a clear and mandatory procedure for the early identification and referral of suspected child victims of trafficking, fully integrated into the national child protection system. Under the revised framework, child protection services are required to initiate investigation of a case when the child is unaccompanied, separated from parents, or when there is uncertainty regarding the guardianship status of the accompanying adult. This ensures that potential indicators of trafficking are recognized at the earliest possible stage.

The amendments introduce a specific obligation for the Child protection service to conduct a structured assessment of safety and risk, including an evaluation of whether the child may be a victim of trafficking or otherwise at risk of exploitation. This assessment is carried out by child protection professionals and is grounded in principle that the best interests of the child shall be a primary consideration.

Where concerns arise, particularly in cases involving unaccompanied children or indicators of trafficking, child protection services must formulate a support plan and arrange protective measures, including appropriate accommodation under their authority. This procedure establishes a predictable and coordinated pathway for children, ensuring that identification and protection processes are consistent, child-centered, and specialist-led.

The National Agency for Children and Families hosted a seminar in the autumn of 2023 on human trafficking and children, which was attended by just over 200 professionals working in social services, child protection, and the school system. The agency plans to hold a similar seminar in 2026.

Furthermore, the Ministry of Education and Children signed a working agreement with the Municipality of Suðurnesjabær, where Iceland's main international airport is located, in January 2024. According to the agreement the Child protection service of Suðurnesjabær is responsible for safe and suitable accommodation for up to 30 unaccompanied minors. Since the agreement came into effect major improvements have been made in hosting and caring for unaccompanied minors. The facility has never reached full capacity, and no unaccompanied minors have been hosted in the general reception centers run by the Directorate of Labour since the agreement came into effect.

Recovery and reflection period and residence permit

The Ministry of Justice will continue to support both the police and the Directorate of Immigration to ensure that all presumed victims of trafficking are informed of their right to a recovery and reflection period, along with other appropriate guidance and referral to the relevant authorities or organizations capable of providing specialized assistance and protection. The Ministry emphasizes that the recovery and reflection period is not dependent on the presumed victim's co-operation and will endeavour to further highlight this in future practice.

In addition to the continuous staff training within the Directorate and proactive screening within the asylum procedure the Ministry of Justice intends to take further steps to improve guidance provided not only to those screened within the asylum system but also to individuals granted a residence permit in Iceland. The aim is to provide clear information on their rights and obligations when immigrating to Iceland, including the rights associated with their residence permit, their rights on the labour market, and their personal rights. Importantly, the information will include guidance on where to seek help if their rights are violated or infringed – this includes information on human trafficking and available services such as those offered by Bjarkarhlíð. This planned initiative responds to developments in recent years indicating that a significant number of potential trafficking victims have entered Iceland under the guise of residence permits granted based on labour participation.

Finally, the Ministry has announced its intention to review Articles 75 and 76 of the Aliens Act No. 80/2016 with the aim of better accommodating the needs of presumed victims of

trafficking who already hold a temporary residence permit in Iceland. The Ministry also intends to explore the possibility of introducing a separate residence permit for individuals subjected to severe labour market violations, modelled on a similar permit found in the Finnish Aliens Act. This legislative review and any resulting amendments are scheduled to take place in 2026.

Once a person has been identified as a victim of trafficking, they are eligible for a temporary residence permit on those grounds under Article 76 of the Aliens Act. This permit is renewable for one year at a time and does not preclude the victim from qualifying for other potentially relevant permits. A person identified as a victim of trafficking who requires a residence permit may be offered an interview with the Directorate to assess their personal circumstances and determine whether they qualify for another type of permit that better meets their needs. Such an assessment is carried out when it has not taken place earlier or when available information is incomplete.

If the person qualifies for international protection, Icelandic legislation mandates that such protection be granted rather than a temporary residence permit issued on the grounds of trafficking. A residence permit on humanitarian grounds may also be considered.

A person who has been awarded a temporary residence permit as a victim of trafficking may, upon renewal, be considered for another type of permit based on their personal circumstances. Any such change is carried out in consultation with, and with the express consent of, the victim. Possible alternatives include a residence permit based on special ties to Iceland or a permit granted for a legitimate and specific purpose. Individuals may also choose to change the basis of their residence to study or work.

The Directorate of Immigration continually seeks to improve and adapt its protocols to meet the needs of victims of trafficking within the existing legislative framework, and the Ministry will work closely with the Directorate during the upcoming legislative review of residence permits for victims of trafficking. The Ministry will also gather information and viewpoints from other relevant authorities and stakeholders as part of this process.