

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



CP(2025)11

Report submitted by the authorities  
of Sweden  
on measures taken to comply with  
Committee of the Parties Recommendation  
CP/Rec(2023)11 on the implementation  
of the Council of Europe Convention  
on Action against Trafficking in Human Beings

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**Report on measures taken by Sweden to comply with Committee of the Parties Recommendation CP/Rec (2023)11 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings**

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

1. Take measures to ensure that THB offences are investigated and prosecuted effectively, leading to proportionate and dissuasive sanctions, in particular by:
  - (a) ensuring that human trafficking offences for different forms of exploitation are proactively and promptly investigated, and continuing to make 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;

The operational work to combat trafficking of human beings (THB) lies within the remit of the regional police work, which means there are different organisational structures depending on the region. In five out of seven police regions, the investigatory and intelligence capacity is located in the Unit for International and Organised Crime (IGOB). In one region (region of Bergslagen), there is a specialised unit within IGOB which handles THB-cases. In the southern region of Sweden, the specialized capacity to combat human trafficking lies within the border police unit B.

The Swedish Prosecution Authority has decided that from April 2024 – all crimes related to human trafficking shall be investigated by senior public prosecutors with accurate competence and experience. All crimes related to human trafficking is handled by The National Unit Against Organised Crime, to ensure effective measures by specialized prosecutors.

In May 2023 the Prosecutor General decided to establish assignments as subject specialists for senior prosecutors within twelve legal areas, whereas human trafficking is one. This role streamlines the exchange of experience and legal expertise between the operational activities and the Prosecution Development Centre. This was preceded by a trial period during the years 2021–2023.

In September 2024 the Swedish Prosecution Authority also assigned a prosecutor to carry out full-time tasks within the framework of the Government's assignment against work-related crime, primarily the work against human trafficking and human exploitation.

In June 2025 the Swedish Prosecution Authority and the Swedish Police Authority were given a government assignment to increase and extend the cooperation regarding human trafficking. The assignment is to be reported to the Ministry of Justice in April and October 2026.

The Government has requested the Swedish Prosecution Authority to specify its work against human trafficking throughout the organization and present the results in its Annual Report of 2025.

- (b) ensuring that human trafficking offences are classified as such every time the circumstances of a case allow it, and that cases of trafficking for the purpose of labour exploitation are not qualified as “human exploitation”, by taking into account all of the different means applicable, which are part of the international definition of human trafficking, including the concept of “abuse of a position of vulnerability”;

The Swedish Police Authority continuously provides training to all investigative units, as well as the Border police and patrolling units, in order to strengthen competence in combating THB. In addition, an online training module, accessible to all police units, has been developed. *Specific training is also offered:* an annual three-week program available to all police officers designated to investigate THB.

For the Swedish Prosecution Authority, it is of most importance that, to the greatest extent, identify all potential crimes related to human trafficking. To emphasise that priority and to improve and increase the knowledge of THB among prosecutors, a legal guidance regarding human

trafficking and human exploitation was published in February 2025 (2025:1). The legal guidance focuses both on the importance to identify crimes and on indicators of possible crimes. It also describes mechanisms that may explain why some people become victims to these crimes. The guidance addresses prosecutors as investigators in these crimes and functions as a manual in these investigations. The legal guidance is widely spread throughout the organization but also to other parties, for example the Swedish Police Authority, and it is available on the Swedish Prosecution Authority's website. The Swedish Prosecution Authority has arranged several workshops and lectures, both internally within the authority and externally, in 2023–2025 to increase awareness and ensure the effective adoption of measures on human trafficking. Next conference is planned to be held in February 2026.

See answer to 1 a.

The Swedish Migration Agency is not a law enforcement agency. Nevertheless, the Migration Agency actively disseminates information about human trafficking within the framework of migration case processing. The Migration Agency has decided to consistently report and internally document suspected cases of human trafficking explicitly as human trafficking, without taking a position on whether they might alternatively classify as human exploitation. This approach ensures that such offences are initially recorded as human trafficking, while the final determination of how the report is formally registered rests with the law enforcement authorities.

- (c) allocating sufficient human and financial resources to the police and the prosecution services in order to be able to conduct proactive and effective investigations in trafficking cases and to prioritise cases of human trafficking and human exploitation;

In recent years, government funding to the Swedish Prosecution Authority and the Swedish Police Authority has increased, leading to the employment of a significant number of prosecutors and police officers.

See answer to 1 a and 1 b.

- (d) ensuring that property used to commit THB, or which can reasonably be considered to constitute proceeds of this crime, is seized to the greatest extent possible;

The Swedish Police Authority's work with financial investigations includes the seizure of assets liable to confiscation. Proceeds of crime, as well as

instrumentalities used to commit crime, can be confiscated. A comprehensive reform of the Swedish legislation on confiscation came into force in November 2024. Where someone is convicted of THB, extended confiscation can be ordered. In addition, the 2024 reform introduced a comprehensive NCBC-measure (independent confiscation), which can be applied even if there is no conviction for a crime, provided that the court is satisfied that certain property is derived from criminal conduct (e.g. THB). Property can be seized to secure the execution of confiscation orders.

In July 2024 the forfeiture rules in Chapter 12 of the Land Code were extended, including greater possibilities to evict tenants who use their apartments for committing crimes.

The Prosecution Development Centre and the Swedish Economic Crime Authority have introduced a new legal guideline/guidance which, among other things, is about how to effectively seize proceeds of crime (2024:7). The legal guidance regarding human trafficking and human exploitation (2025:1) also emphasizes the importance of investigating the possibilities of seizing proceeds of these crimes.

In THB-cases an accountant, employed at the Swedish Prosecution Authority, is regularly appointed to work with assets recovery in the case. He or she is the right hand of the prosecutor, leading the investigation and giving the assets investigator at the Swedish Police Authority directives about what measures should be taken to conduct the financial investigation of the traffickers. If there is money to be recovered from the traffickers, the prosecutor seizes the assets and produces a claim that the court should impound the assets in order to secure the payment of the victim's damages. This impoundment is maintained until the verdict has gained legal force.

- (e) continuing to improve the knowledge of investigators, prosecutors and judges about the seriousness of THB, the severe impact of exploitation on the victims and the need to respect their human rights (paragraph 92);

The Swedish Prosecution Authority has arranged several workshops and lectures in 2023, 2024 and 2025 to raise awareness and ensure effective measures against on human trafficking. The next conference is scheduled for February 2026. All prosecutors working on this issue are regularly invited to, and participate in, training sessions provided by, for example, Europol and the Swedish Gender Equality Agency.

The Swedish courts are independent and autonomous from the Parliament, the Government and other government agencies. The Swedish Judicial Training Academy, which operates independently of both the Government and the Swedish National Courts Administration, is responsible for providing training for judges, including determining the selection and content of courses. The training program is based on an inventory of the needs identified among the courts and judges. At present, the Swedish Judicial Training Academy does not offer specific training focused on THB. However, courses covering criminal law, particularly those addressing children in legal proceedings, as well as the comprehensive program on the role of a judge, are relevant to cases involving THB or situations where victims are especially vulnerable. Within the program on the role of a judge, general issues such as fair trial, the treatment of victims etc., including the behaviour of vulnerable persons, are addressed. In addition, the Swedish Judicial Training Academy organizes annual criminal law seminars on relevant topics.

2. Take further steps to ensure full compliance with Article 26 of the Convention, including by:
- (a) bringing the guidelines on the non-punishment of victims of trafficking issued by the Prosecutor General fully in line with Article 26 of the Convention by clarifying that the non-punishment provision is capable of being applied to all offences that victims of trafficking were compelled to commit;

The Swedish Prosecution Authority's Legal Guidance regarding human trafficking and human exploitation, issued in February 2025 (2025:1, see above 1.b), contains information about article 26 (chapter 9.6).

In February 2025, the Swedish Government appointed an inquiry with the task of analysing how the revised EU Anti-Trafficking Directive should be implemented in Swedish Law. The revised EU Directive includes an extension of the non-prosecution principle set out in the Directive to a non-application of other penalties to the victim, for example for administrative offences.

- (b) ensuring that victims of THB are promptly identified as such, in any event before being convicted of offences they were compelled to commit;

Sweden has a new Social Services Act as of 1 July 2025. Under the new legislation, social services are expected to work more preventively, be easily accessible, and knowledge-based. One of the overarching goals of the new Social Services Act is to promote equal and equitable living conditions. The social services shall offer support to victims of crime. This includes being aware that individuals may be in need of support to change their situation.

The Swedish Gender Equality Agency has developed a manual for situations where human trafficking is suspected, offering support and practical guidance for professionals who may come into contact with individuals subjected to human trafficking. The manual provides a comprehensive overview of the support and protection available to victims of human trafficking in Sweden.

The abovementioned manual represents Sweden's response to a National Referral Mechanism (NRM), providing guidance for professionals and fostering enhanced cross-agency cooperation. It was revised and published in 2019, and a digital version in Swedish was updated in 2023.

In addition, the National Board of Health and Welfare and the Swedish Gender Equality Agency have developed educational packages and online training courses addressing child sexual exploitation, prostitution, and human trafficking. These resources are designated for professionals who may encounter children or adults in vulnerable situations, as well as those engaged in efforts to prevent and combat such crimes.

The National Board of Health and Welfare, together with the Swedish Migration Agency and the Swedish Police Authority, have carried out a three-year government assignment to prevent unaccompanied children from going missing (S2022/03300 (delvis)). The assignment focused on increasing knowledge and developing national guidelines to provide support for how relevant actors can work to prevent unaccompanied children from going missing and how they should act if a disappearance does occur.

The Government has commissioned the National Board of Health and Welfare to strengthen awareness and knowledge within social services and municipal social welfare boards on human trafficking and human exploitation. The assignment aims to ensure that social services are better equipped to identify victims and to make use of the possibility to apply for reflection periods for presumed victims. The Board will also follow up on

the number of applications submitted and report the results to the Government Offices by March 2026.

The Swedish Police Authority regularly conducts outreach work to identify victims, both in the digital arena and in everyday police work. The development of the outreach police work is regularly reviewed, and one of the objectives is to find common methods to identify places where potential victims of human trafficking can be found. This will increase accuracy, and available resources will be used more correctly. As a step forward in this area, an internal methodological support-guide regarding digital outreach work was launched in 2025.

To improve and increase the knowledge of THB among prosecutors, the Swedish Prosecution Authority's Legal Guidance regarding human trafficking was issued in February 2025 (2025:1). It includes guidance on how to identify victims of THB. In December 2024 the Swedish Prosecution Authority arranged a workshop focusing on identifying crimes and victims of THB. The Prosecution Development Centre works to spread information about the guidelines throughout the organization but also to other parties, for example the Swedish Police Authority. Also see above 2 a.

In 2024, the Swedish Gender Equality Agency focused on the thematic issue of children being recruited and exploited for criminal purposes. This work resulted in a round table discussion, a session at a national conference which also included a presentation of the Trocadero case (Paris, France), a web article, and an analysis in the Agency's annual report. The report also led to a new governmental assignment for the Ombudsman for Children, tasking the Ombudsman to review how criminal networks exploit children for sexual exploitation and trafficking for other purposes.

The Regional co-ordinators against prostitution and human trafficking provide guidance to local and regional actors, assisting them in identifying presumed victims of trafficking and on how to give them support and protection.

- (c) encouraging prosecutors to be proactive in establishing whether an accused person is a potential victim of trafficking, and to consider that, having been trafficked, the culpability of the victim may be diminished, or even removed entirely;

The Legal Guidance (2025:1) refers to the GRETA recommendations. Training initiatives were conducted within the Swedish Prosecution Authority in connection with the publication of the guidelines.

See answer to 1 a, 1 b and 2 a.

- (d) ensuring that all negative consequences faced by victims of THB, such as any form of detention, entry bans or delays in seeking legal residence in Sweden, are lifted for presumed victims of THB (paragraph 97);

THB-specific training has been directed towards the border police during the past two years, which has resulted in raised awareness about trafficking and about prostitution as an entry point to trafficking.

The right to a residence permit applies only to cases in which the preliminary investigation leader or the Social Services Authority submits an application for a permit pursuant to Chapter 5, Section 15 of the Swedish Aliens Act. The Swedish Migration Agency identifies a significant number of potential victims of human trafficking every year at the stage when persons with no legal right to stay in Sweden are held in detention due to deportation orders issued by the police. These orders are often implemented swiftly, raising concerns that identification work may not always be fully completed before departure.

3. Take further steps to improve the identification of victims of trafficking, in particular by ensuring that:

- (a) the formal identification of victims of THB is not made conditional on their co-operation in the investigation and criminal proceedings or the initiation of criminal proceedings;

A person is formally recognized as a victim of human trafficking when the crime is detected by the police or a prosecutor. Victim identification happens at the same time as the crime is identified and does not depend on the victim's involvement in the investigation. This is because human trafficking is subject to general prosecution.

A residence permit for recovery and reflection may be granted a victim for the purpose of recovery and to ensure that the victim is able to make an

informed decision of whether he or she wants to cooperate with the law enforcement authorities. The granting of the permit is not conditional upon cooperation with the law enforcement authorities.

The National Board of Health and Welfare has been tasked to disseminate information and provide competence support to municipal social welfare committees regarding human trafficking and exploitation. Furthermore, the Board is tasked with monitoring the number of applications of residence permits for recovery and reflection, in cases where there is suspicion that an individual is a victim of human trafficking or exploitation. The Board is required to report on the assignment no later than 31 March 2026.

The National Board of Health and Welfare has been tasked by the government with providing social services knowledge about the reflection period. In fulfilling this assignment, the Swedish Gender Equality Agency has collaborated with the Board, including by organising a meeting with regional co-ordinators to discuss experiences related to applications for a reflection period.

- (b) regional co-ordinators against prostitution and human trafficking and the police are provided with sufficient human and material resources in order to be able to increase their efforts towards the identification of victims of trafficking;

The new Social Services Act, which entered into force 1<sup>st</sup> of July 2025, represents a paradigm shift whereby social services are given better tools to identify needs early on. Social services must work preventively, and a preventive focus needs to be integrated into all social services activities in all of the country's municipalities.

The regional co-ordinators identified 430 presumed victims of trafficking in 2024, for the second year running a majority of the victims were victims of labour exploitation.

Regional co-ordinators fill an important gap in the Swedish system of support and protection for victims of trafficking. Their work has been both strategic and operational, complementing the efforts of social services and the County Regional Administrative Boards. However, rather than strengthening the existing system, the regional co-ordinators have, in practice, come to replace it. As a result, NSPM at the Swedish Gender Equality Agency, is currently revising the regional co-ordinator model. This reform, which includes a risk assessment of its impact on the target group, is ongoing.

- (c) the police and other relevant actors adopt a more proactive approach and increase their outreach work to identify potential victims of trafficking, and regional co-ordinators against prostitution and human trafficking are included in such activities whenever possible;

The proactive fieldwork is always conducted in a multi-agency setting, including at least the Swedish Police Authority and the Social Services, as well as the regional co-ordinators connected to the GEA (the Swedish Gender Equality Agency). The Border Police and the regional Coordinators are furthermore involved in the multi-agency team to detect work-related crimes such as labour exploitation within the framework of *A-krim*, an interagency cooperation against work-related crime.

Social services shall according to the new Social Service Act, identify risks and social problems through outreach work and offer individual support.

In 2024, there was an increase in the number of joint inspections within the framework of the authority cooperation to combat for work-related crime. The Delegation against Labour Market Crime presented its final report, Labour Market Crime – Approach, Tools and Measures, Continued Work (SOU 2025:25), in March 2025. The report is currently being reviewed within the Government Offices of Sweden.

- (d) regular training on THB is provided to all relevant actors, including law enforcement officers, labour inspectors, immigration officials, and education and healthcare professionals (paragraph 163);

In 2024 the inter-agency cooperation to combat work-related crime has continued to develop the work at the regional centres and methods at national and regional level to increase effectiveness against complex forms of labour market crime, including human trafficking.

Both the National Board of Health and Welfare and the Swedish Gender Equality Agency have developed educational packages and online training courses on child sexual exploitation, prostitution, and human trafficking. These resources are intended for professionals who may encounter children or adults in vulnerable situations or who are engaged in efforts to prevent and combat such crimes.

See answer to 1 b, regarding training within the Swedish Police.

See answer to 1 e, regarding training within the Swedish Prosecution Agency.

The Migration Agency has established a comprehensive framework for staff training on matters concerning human trafficking. As part of the introductory training, employees receive a brief introduction to the topic. In addition, an online training course is available to all staff, and the Agency's anti-trafficking network provides training to approximately 500 employees annually, based on identified needs.

- Appendix 1 - List of GRETA's conclusions and proposals for action
1. Right to information

(a) GRETA welcomes the steps taken by the Swedish authorities to ensure that presumed and identified victims of trafficking are provided with information concerning their rights and services available to them, in a language they can understand, and invites them to continue their efforts in this regard. Law enforcement officers and other authorities in contact with victims of trafficking should be systematically trained and instructed on how to properly explain to victims of THB their rights, taking into account the victims' age, maturity, intellectual and emotional capacity, literacy and any mental, physical, or other disabilities which may affect their ability to understand the information provided. Similarly, staff working at asylum reception centres and detention centres should be trained and instructed on how to provide information, in a proactive manner, to persons and groups at risk of being trafficked (paragraph 38);

In accordance with article 12 in the Convention on the rights of the Child, serving as national law in Sweden, States Parties shall assure to the child who is capable of forming his or her own views the right to express those views freely in all matters affecting the child. This is preceded by the access to individualized information.

In 2024, the inter-agency cooperation to combat work-related crime continued to provide a forum for the Gender Equality Agency to contribute knowledge, methodological support and coordination on the issue of human trafficking to other agencies and, together with other agencies, target the right groups.

The Swedish Police Authority is obliged to inform victims about their rights in a language they understand. This requirement applies to adaptations for children as well as for particularly vulnerable victims of crime.

Under existing rights to interpretation, victims of trafficking are ensured access to information about their rights and available services in a language they understand.

(b) GRETA considers that the Swedish authorities should take additional steps to ensure the availability of interpreters for different languages spoken by victims of trafficking, as well as their sensitisation to the issue of human trafficking (paragraph 39).

The Administrative Procedure Act (2017:900) applies to the processing of matters at administrative authorities and the processing of administrative matters at the courts (section 1). An authority shall use an interpreter and arrange to translate documents if this is needed to enable a private person

to look after their rights when the authority is in contact with someone who does not have a command of Swedish, and, in the same circumstances, an authority shall use an interpreter and make the content of documents accessible when it is in contact with someone who has a disability that severely limits their ability to see, hear or speak (section 13).

Victims of trafficking have the right to interpreters. The availability of interpretation depends on the language spoken and the interpreters available. Nevertheless, the authorities make every effort to ensure that victims of trafficking receive interpretation services. The interpretation services are currently being reviewed. The Government appointed an inquiry in February 2025, and the report is due no later than 31 March 2026.

According to the answer to question 1, the Swedish Police Authority is obliged to provide information in a language the victim understands, which sometimes requires the use of interpretation services. The interpretation services employ qualified interpreters, many of whom are specialized in legal matters and can also be instructed to ask questions about human trafficking.

## 2. Legal assistance and free legal aid

(a) GRETA considers that the Swedish authorities should take further steps to guarantee accessible and effective legal assistance for victims of THB, by ensuring that:

- 1) legal assistance is provided as soon as there are reasonable grounds for believing that a person is a victim of THB, before the person concerned has to decide whether or not to co-operate with the authorities and/or make a statement;

In accordance with the provisions of the Act concerning Counsel for the Injured Party (1988:609), the court can appoint a counsel for an injured party, to help a victim of a crime. A counsel for an injured party protects the interest of the victim and can for example bring an action for damages on the victim's behalf in the criminal case if the prosecutor does not do so. Such counsel is common in cases where the victim has been exposed to, for example, THB, a sexual offence, assault or unlawful deprivation of liberty.

A counsel for the injured party may be appointed by the court after a preliminary investigation has been initiated, at the request of the injured party or when there are other grounds for doing so. A preliminary investigation must be initiated as soon as there are reasons to assume, due to a statement or for other reasons, that a crime subject to public

prosecution has been committed. The head of the preliminary investigation is obliged to notify the court if the injured party has requested to be assigned counsel or if there are other grounds for appointing such counsel (Chapter 23 section 5 of the Swedish Code of Judicial Procedure). If the preliminary investigation pertains to a sexual offence a notification to the court to appoint a counsel for an injured party must be made immediately when the preliminary investigation has begun.

In April 2024, the Government appointed an Inquiry to review parts of the Swedish Legal Aid system. According to the committee's terms of reference (Dir. 2024:39), certain provisions of the Act concerning Counsel for the Injured Party (1988:609) was to be reviewed. The commission submitted its report in November 2025 (SOU 2025:111) and is now being referred for consultation. The inquiry proposes, among other things, that the obligation to immediately notify the court shall be extended to apply to offences against an injured party who is, currently or former, closely related to the suspect.

A residence permit for recovery and reflection may be granted a victim for the purpose of recovery and to ensure that the victim is able to make an informed decision of whether he or she wants to cooperate with the law enforcement authorities. The granting of the permit is not conditional upon cooperation with the law enforcement authorities.

See question 1 a and b regarding the Swedish Police Authority – right to information.

- 2) victims of THB have unrestricted access to free legal assistance by a professional lawyer with specialised knowledge on THB cases in legal proceedings, including the enforcement proceedings and the proceedings on state compensation;

The appointed counsel for an injured party is funded by state, regardless of the financial situation or immigration status of the injured party.

If a person under the age of 18 has been subjected to a crime, a special representative for the child may be appointed. Such a representative can be appointed if a preliminary investigation has been initiated regarding an offence that may lead to imprisonment and the child's guardian can be suspected of the offence, or if it is feared that a guardian, due to their relationship with the person suspected of the offence, will not safeguard the child's rights. The special representative takes over the guardian's

authority to protect the child's rights during a preliminary investigation and a trial.

In Sweden, there is also a system of legal aid, which can be granted in various legal matters, in accordance with the provisions of the Legal Aid Act (1996:1619), if the applicant needs legal assistance beyond advice and this need cannot be met in any other way. The right to legal aid is income-/means-based, meaning that legal aid cannot be granted to a person whose income exceeds a certain amount.

See also the answer to 4 a below regarding the new proposals in the Swedish Government Official Report Compensation rules with the victim of crime in focus (SOU 2025:23).

An application for criminal injuries compensation from the state shall be submitted to the Swedish Crime Victim Authority. The application procedure is such that the victim of crime should generally be able to apply without the need of legal assistance by a lawyer. However, the Swedish Crime Victim Authority may under certain conditions, considering the applicant's financial and other circumstances, grant compensation from public funds for, inter alia, costs for legal assistance. The Swedish Crime Victim Authority may also grant an advance on such compensation.

- 3) the Bar Association is encouraged to offer training on human trafficking to lawyers with a view to ensuring that trafficking victims are systematically appointed a specialised lawyer;

The Swedish Bar Association offers courses for counsellors on issues regarding victims of crime, and a specialised course in human trafficking will be available in 2026. The lawyers appointed as counsellors in THB-cases usually have special expertise and experience.

- 4) NGOs which provide free legal assistance to victims of THB receive adequate funding (paragraph 49).

A large share of the funds allocated to the National Support Programme (NSP) 2024, by the Swedish Gender Equality Agency, was directed to the Safe Havens Trafficking Center, run by the Swedish Salvation Army. The centre provides free legal assistance and social support to presumed victims of trafficking or exploitation. Since 2020, there has been an increase in individuals seeking legal support for labour exploitation. Free

legal assistance to presumed victims of trafficking is currently offered only by NGOs and trade unions.

### 3. Psychological assistance

- (a) GRETA considers that the Swedish authorities should take further steps to guarantee timely access of victims of trafficking to psychological assistance, regardless of their residence status, and ensure that it is provided for as long as their individual situation requires, in order to help them overcome their trauma and achieve a sustained recovery and social inclusion (paragraph 54).

In Sweden, social rights are not linked to being a victim of THB; general rules apply.

Article 39 in the Convention on the Rights of the Child, which has been incorporated into Swedish law since 2020, mandates that State Parties shall take all appropriate measures to promote physical and psychological recovery and social reintegration of a child victim of: any form of neglect, exploitation, or abuse; torture or any other form of cruel, inhuman or degrading treatment or punishment; or armed conflicts.

The healthcare system has a clear responsibility to detect and identify patients exposed to violence, including prostitution, and to provide appropriate medical and psychosocial care. Within the healthcare system, specialized clinics such as MIKA offer targeted support for individuals involved in prostitution. In other cases, referrals are made to primary care, child and adolescent psychiatry (BUP), for children and young people up to 18 years of age, or adult psychiatry for those requiring psychiatric care.

- (b) GRETA considers that the Swedish authorities should further strengthen effective access to, and/or reintegration of, the labour market for victims of THB and their economic and social inclusion through the provision of vocational training and job placement, raising awareness amongst employers, and the promotion of micro-businesses, social enterprises and public-private partnerships, including through state supported employment programmes, with a view to creating appropriate work opportunities for victims of trafficking (paragraph 58).

The Swedish Gender Equality Agency has continued to allocate funds to the Assisted Voluntary Return and Reintegration Programme (ÅMP) in collaboration with IOM Finland: [Support programme in Sweden for persons subjected to human trafficking | IOM Finland](#)

Key achievements of 2024 included:

- 31 new beneficiaries returned to 13 countries, with their reintegration assistance period initiated. Of these, 16 beneficiaries also received return and/or immediate post-arrival assistance from IOM.
- 78 beneficiaries received financial reintegration assistance, including individuals who had returned during earlier programme phases.
- 572 beneficiaries were supported in developing reintegration plans following their return, including budgets for in-kind support.
- Monitoring results showed that beneficiaries were largely satisfied with the assistance provided before, during, and after return. Results further indicated that 80 per cent of monitored beneficiaries achieved a level of reintegration considered sustainable.
- To make program information material more inclusive and accessible, IOM produced video versions of the material, now available in English and Spanish on the IOM Finland website to improve outreach.
- In collaboration with regional co-ordinators and the Swedish Migration Agency (SMA), IOM organized a webinar to facilitate dialogue and information exchange with SMA caseworkers, ensuring that potential beneficiaries have access to the programme.

The National Support Programme (NSP) is run by the Swedish Civil Society Platform against Human Trafficking, which is an association consisting of several different civil society organizations. NSP offers support to individuals in Sweden who have been exposed to prostitution or human trafficking. The support is a complement to society's public efforts. The program offers, among other things, support for urgent basic needs, counselling, shelters, information, interpretation, legal advice and support in contact with authorities. The Swedish Gender Equality Agency provided SEK 3.2 million to the National Support Programme (NSP) in 2024, which is the same amount as in 2023. In 2022, the NSP was allocated SEK 2.5 million. During 2024, the NSP provided support to 63 persons, of whom 29 were women (of whom 1 was a trans woman), 10 men and 24 accompanying children. A majority of the women had been subjected to sexual exploitation and a majority of the men had been subjected to labour exploitation.

#### 4. Compensation

(a) GRETA considers that the Swedish authorities should make additional efforts to guarantee effective access to compensation for victims of THB, 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;

Same answer as to Question 1 d about financial investigations.

The seizure of assets is made for the purpose of evidence during the criminal proceedings but also for the attachment to claim for damages.

In July 2023, approximately 150 berry pickers from Thailand arrived in the village of Åsele in Västerbotten County, with the hope of fair working conditions and wages according to the employment agreement. Instead, they were subjected to gross human exploitation. Two berry entrepreneurs were convicted of the crime and ordered to pay damages. The Swedish Crime Victim Authority has granted criminal compensation to 29 of the affected berry pickers with SEK 80,000 each for the violation of personal integrity they were subjected to. In total, the compensation amounts to just over SEK 2.3 million. The judgment includes nine victims, but more berry pickers may be entitled to compensation. The Swedish Crime Victim Authority has so far granted criminal damage compensation to 20 people who are not included in the judgement.

- improving the capacity of law enforcement officers to locate executable assets or income of offenders in THB cases;

Since the strengthening of the repossession of proceeds of crime during 2024 the Swedish Police Authority has directed training to law enforcement personnel investigating serious and organised crime.

See answer to recommendation 1 c and d above. The accountants employed at the Swedish Prosecution Authority participate in continuous professional training and work with all types of cases, including THB-cases.

- ensuring that victims of THB have effective access to free legal assistance by a lawyer in the proceedings for state compensation as well as in enforcement proceedings

See answer to 2 a 2, Appendix 1.

See answer to 2 a 4 about funding the National Support Programme

See answer to 2 a 2, Appendix 1.

The Swedish Crime Victim Authority has been tasked, through the Government's appropriation directions for 2025, to enhance and expand the information contained in the Crime Victim's Guide and to undertake targeted information initiatives to raise awareness of how the guide can support crime victims. Particular emphasis shall be placed on victims subjected to men's violence against women, violence in close relationships, honor-related violence and oppression, as well as prostitution, human trafficking, and related forms of exploitation. The objective is to ensure that crime victims' rights are presented in a consolidated, accessible, and comprehensible manner. The information shall furthermore be adapted to the needs of groups in particularly vulnerable situations, including persons with disabilities, children and young people, LGBTQI individuals, and older persons. The assignment shall be reported no later than 25 May 2026.

The Crime Victim's Guide: [En guide för dig som utsatts för brott | Brottsofferguiden](#)

- ensuring that the length of the proceedings to claim compensation from the perpetrator and the state is reasonable;

It can be mentioned that an inquiry appointed in 2023 presented its report – Compensation rules with the victims of crime in focus (SOU 2025:23) – in March 2025. The report contains a number of proposals that aim to strengthen the position of victims of crime. The inquiry proposes, among other things, that the process to receive criminal injuries compensation from the state is simplified and shortened, and that the possibilities of attachment (seizure of property for payment of a debt) to the benefit of victims of crime are expanded. The report has been referred for consideration to relevant bodies and is currently being considered in the Government Offices.

- encouraging the Swedish Judicial Training Academy to include training on THB and compensation in the training programmes for judges (paragraph 74).

The Swedish courts are independent and autonomous in relation to the Parliament, the Government and other government agencies. The Swedish Judicial Training Academy, which is independent from the Government and the Swedish National Courts Administration, is responsible for providing training for judges, including to independently decide what courses are offered and their content.

See answer to 1 e.

## 5. Investigations, prosecutions, sanctions and measures

- (a) GRETA once again invites the Swedish authorities to consider establishing as a criminal offence the use of services which are the object of all forms of trafficking exploitation, with the knowledge that the person is a victim of trafficking in human beings (paragraph 79);

On 6 February 2025, the Swedish Government appointed an inquiry with the task of analysing and proposing how Sweden should implement the Amended EU Anti-Trafficking Directive (2024/1712). According to article 18a of the Amended Directive, Member States shall take the necessary measures to ensure that, when it is an intentional act, the use of services provided by a victim of an offence referred to in Article 2 of the Amended Directive constitutes a criminal offence, where the victim is exploited to render such services and the user of the services knows that the person providing the service is a victim of an offence referred to in Article 2. The inquiry shall present its proposals as of the 17<sup>th</sup> of December 2025.

- (b) GRETA once again urges the Swedish authorities to take measures to ensure that THB offences are investigated and prosecuted effectively, leading to proportionate and dissuasive sanctions, in particular by:

- ensuring that human trafficking offences for different forms of exploitation are proactively and promptly investigated, and continuing to make 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;

See answer to 1 a and 1 b.

The Swedish Prosecution Authority's Legal Guidance regarding human trafficking from February 2025 (2025:1) includes guidance on investigation

techniques. Chapter 8.5 specifically concerns interrogations and forensic evidence.

The Swedish Police Authority is continuously developing methods for identifying and investigating human trafficking for all purposes. Regarding human trafficking for sexual purposes, new methods have been developed to achieve success in the work against perpetrators, without the necessity to involve the victim to a greater extent. In the area of labor exploitation, methods are being developed to identify victims to a greater extent and investigate perpetrators with evidence in the form of material other than the victim's testimony alone.

- ensuring that human trafficking offences are classified as such every time the circumstances of a case allow it, and that cases of trafficking for the purpose of labour exploitation are not qualified as "human exploitation", by taking into account all of the different means applicable, which are part of the international definition of human trafficking, including the concept of "abuse of a position of vulnerability";

Human trafficking and human exploitation are regulated in separate sections in the Swedish Criminal code, and human exploitation is subsidiary to human trafficking (Chapter 4, Sections 1 a and 1 b in the Swedish Criminal Code). Unlike human trafficking, criminal liability for human exploitation does not require that any trade measures have taken place, why an act is sometimes prosecuted as human exploitation when evidence of trade measures is missing, in the same way an act can be prosecuted as gross procuring instead of human trafficking for sexual purposes when improper means cannot be proven.

The Swedish Migration Agency files a substantial number of police reports regarding suspicion of human trafficking each year and has developed detailed procedural guidelines outlining the appropriate steps to be taken in such cases.

See answer to recommendations 1 a and 1 b.

- allocating sufficient human and financial resources to the police and the prosecution services in order to be able to conduct proactive and effective investigations in trafficking cases and to prioritise cases of human trafficking and human exploitation;

See answer to recommendation 1 c.

The Swedish Gender Equality Agency has commissioned two researchers to conduct studies: one on convictions for sexual exploitation and another on trafficking in human beings for forced labour and human exploitation.

The Swedish Gender Equality Agency has published a summary of these studies: [varfor-doms-sa-fa-for-manniskohandel-2024-10-10](#)

- ensuring that property used to commit THB, or which can reasonably be considered to constitute proceeds of this crime, is seized to the greatest extent possible;

Property used as an instrumentality in an offence under this code (section §36:2 in the Swedish Criminal code) may be declared confiscated if this is necessary to prevent an offence or if there are otherwise special grounds. The provision of the first paragraph also applies to property produced through an offence under this code, property whose use constitutes such an offence or someone has otherwise handled in a way that constitutes such an offence. The value of the property may be declared confiscated in place of the property.

The Swedish Police Authority's work with financial investigations includes the seizure of assets liable to confiscation. Proceeds of crime, as well as instrumentalities used to commit crime, can be confiscated. A comprehensive reform of the Swedish legislation on confiscation came into force in November 2024. Where someone is convicted of THB, extended confiscation can be ordered. In addition, the 2024 reform introduced a comprehensive NCBC-measure (independent confiscation), which can be applied even if there is no conviction for a crime, provided that the court is satisfied that certain property is derived from criminal conduct (e.g. THB). Property can be seized to secure the execution of confiscation orders.

See answer to recommendation 1 d.

- continuing to improve the knowledge of investigators, prosecutors and judges about the seriousness of THB, the severe impact of exploitation on the victims and the need to respect their human rights (paragraph 92).

Regular and continuous training is provided professionals within the Swedish Police Authority, for example through online modules and an annual three-week training aimed for investigators of organized crime designated to investigate THB.

See answer to recommendation 1 b and 1 e.

## 6. Non-punishment provision

(a) GRETA urges the Swedish authorities to take further steps to ensure full compliance with Article 26 of the Convention, including by:

- bringing the guidelines on the non-punishment of victims of trafficking issued by the Prosecutor General fully in line with Article 26 of the Convention by clarifying that the non-punishment provision is capable of being applied to all offences that victims of trafficking were compelled to commit;

See answer to recommendation 2 a.

- ensuring that victims of THB are promptly identified as such, in any event before being convicted of offences they were compelled to commit;

Sweden has a new Social Services Act as of 1 July 2025. Under the new legislation, social services are expected to work more preventively, be easily accessible and knowledge-based. One of the overarching goals of the new Social Services Act is to promote equal and equitable living conditions. The social services shall offer support to victims of crime. This includes being aware that individuals may be in need of support to change their situation.

The Swedish Gender Equality Agency has developed a manual for situations where human trafficking is suspected, offering support and practical guidance for professionals who may come into contact with individuals subjected to trafficking. The manual provides a comprehensive overview of the support and protection available to victims of human trafficking in Sweden.

Both the National Board of Health and Welfare and the Swedish Gender Equality Agency have developed educational packages and online training courses on child sexual exploitation, prostitution, and human trafficking. These resources are intended for professionals who may encounter children or adults in vulnerable situations or who are engaged in efforts to prevent and combat such crimes.

If the Swedish Police Authority finds out about circumstances leading to the change of the status of the parties (from suspect to victim), the prosecutor leading the investigation will promptly be notified.

See answer to recommendation 2 a and 2 b.

- encouraging prosecutors to be proactive in establishing whether an accused person is a potential victim of trafficking, and to consider that, having been trafficked, the culpability of the victim may be diminished, or even removed entirely;

See answer to recommendation 1 a and 1 b.

- ensuring that all negative consequences faced by victims of THB, such as any form of detention, entry bans or delays in seeking legal residence in Sweden, are lifted for presumed victims of THB (paragraph 97);

Specific attention has been dedicated to art. 10:2 in the Council of Europe Convention on Action against Trafficking in Human Beings. This means that as soon as a person is identified as a victim of human trafficking, a period of reflection should be offered, ensuring protection and assistance to the person.

See answer to 2 d.

- (b) GRETA considers that the adoption of an explicit non-punishment provision, along with training about the non-punishment principle for police, prosecutors and judges, would facilitate the effective implementation of Article 26 of the Convention (paragraph 98).

The Swedish Prosecution Authority's Legal Guidance regarding Human Trafficking and Human Exploitation, issued in February 2025 (2025:1, see above 1.b), contains information about article 26 (chapter 9.6). The Prosecution Development Centre works to spread information about the guidelines throughout the organization but also to other parties, for example the Swedish Police Authority. It is also available on the Swedish Prosecution Authority's website.

## 7. Protection of victims and witnesses

- (a) GRETA considers that the Swedish authorities should make full use of all available measures to protect victims and witnesses of THB and to prevent intimidation during the investigation, as well as during and after court proceedings (paragraph 106).

The social services are responsible for sheltered accommodation and to offer temporary accommodation to those who need protection from threats, violence, or other abuse. On April 1, 2024, a new regulatory framework for sheltered accommodation entered into force. Among other things, the changes clarified that not only individuals subjected to intimate partner violence may be assessed as needing such protection, but also others - for example, persons who have been exploited in prostitution or human trafficking.

Victims are able to testify separated from the defendant in court. If the victim is a minor or otherwise not able to present him-/herself at the hearing a video recording can be made in advance. As long as the defendant has been able to question the victim's statement this qualifies as a statement in court. There is a specific provision regarding intimidation and obstructing the course of justice during the investigation; section §17:10 in the Swedish Criminal code.

As of 1 July 2025, prosecutors may issue restraining orders to protect victims and witnesses from being approached or contacted during court proceedings (Government Bill 2024/25:123 and Section 1 of the Restraining Orders Act [1988:688]).

On January 1, 2025, a new law (2024:1180) on anonymous witnesses in criminal cases entered into force. From that date there is now an opportunity for witnesses to, under certain conditions and in the case of serious crime, be heard anonymously during a preliminary investigation and in criminal cases in court.

## 8. Specialised authorities and co-ordinating bodies

- (a) While welcoming the increased number of prosecutors specialised in trafficking in human beings and the existence of anti-trafficking units in the police, GRETA is concerned by the fact that two of those units were reorganised/disbanded following GRETA's third evaluation visit.

The Swedish Police Authority now organizes three special anti-trafficking units. For example, in the south region of Sweden, the provision of Human Trafficking and Human Exploitation is now handled by the Border Police, alongside and equally prioritized as the other forms of

organized crime. In Sweden there is only one police authority: the Swedish Police Authority. This implies that all police officers, including the border police, belongs to the same Authority and receive the same basic training, regardless of tasks and roles. All regions, regardless of having a special anti-trafficking unit or not, have well-resourced and equipped investigative units as well as a good outreach capacity.

- (b) GRETA considers that the Swedish authorities should ensure that this does not have a negative impact on the specialisation and capacity of the police to deal with THB cases (paragraph 112);

The Swedish Police Authority's focus on the area and knowledge has developed significantly in recent years. The aim of the reorganization is to improve the work dealing with THB-cases, and developments are being closely monitored in order to further develop the organization in the area.

- (c) GRETA considers that the authorities should encourage the Swedish Judicial Training Academy to strengthen the provision of training on THB to judges, and ensure that training on THB is regularly provided to relevant professional groups, including law enforcement officials and prosecutors (paragraph 113);

The Swedish courts are independent and autonomous in relation to the Parliament, the Government and other government agencies. The Swedish Judicial Training Academy, which is independent from the Government and the Swedish National Courts Administration, is responsible for providing training for judges, including the decision on what courses are offered and their content. The training program offered is based on an inventory of the need among the courts and judges. The Swedish Judicial Training Academy currently provides no specific training directed towards issues on THB. However, the courses covering criminal law and in particular children in legal proceedings, as well as the comprehensive course program on the role of a judge, are of relevance for cases regarding THB or where victims are in a particular vulnerable situation. In the course program on the role of a judge, general issues on a fair trial, the treatment of victims etc., including behaviour of vulnerable persons, are covered. In addition, the Swedish Judicial Training Academy organizes annual criminal law seminars on relevant topics.

- (d) GRETA considers that the Swedish authorities should ensure that the investigation of all possible cases of trafficking in human beings, including those that may initially be qualified as human exploitation, is handled by prosecutors with knowledge of THB (paragraph 114).

The Swedish Prosecution Authority has decided that from April 2024, all crimes related to Human Trafficking shall be investigated by senior public prosecutors with accurate competence and experience. All crimes related to Human Trafficking – including those that may initially be qualified as human exploitation – is now handled by The National Unit Against Organised Crime, to ensure effective measures by specialized prosecutors.

## 9. International co-operation

- (a) GRETA welcomes the Swedish authorities' participation in multilateral and bilateral international co-operation against THB, as well as Sweden's contribution to international co-operation through the work of the Ambassador-at-large for Combating Trafficking in Persons (see paragraph 18) and support for international organisations, and invites them to continue their efforts in this regard (paragraph 120).

International cooperation is vital in effectively combatting a cross-border crime like human trafficking. Sweden will continue its efforts to promote this area, and hence take part in relevant international decision-making fora. Taking an active part in relevant negotiations, bringing national experiences to the table, and sharing best practices is a way of strengthening, not only own capacities, but also to assist others in achieving better results. Multilateral as well as bilateral cooperation will benefit from this. Relevant authorities are regularly encouraged to engage in international cooperation and training, for strategic exchanges and sharing of best practice, as well as for operative cooperation or sharing of information. The Swedish Police Authority has, for instance, in the last year upgraded its participation in the EMPACT cooperation within the EU. A new Ambassador for Combatting Trafficking in Persons was appointed during the year. Planned work for the next year include initiating partnerships to enhance the preventive work together with states of origin and transit, assisting law enforcement agencies to strengthening cooperation with key countries through diplomatic channels and with relevant agreement, but also working to reduce demand for prostitution and human trafficking.

The Swedish Gender Equality Agency regularly participates in international meetings and in international co-operation arrangements

concerning human trafficking. The Agency moreover contributes to Sweden's international work on human trafficking. This co-operation has, among other things, helped to identify best practices and to strengthen Sweden's work internationally.

As part of Sweden's chairmanship of the Nordic Council of Ministers in 2024, the Swedish Gender Equality Agency, in collaboration with the Government Offices of Sweden, organized two meetings of the Nordic Working Group Against Trafficking in Human Beings, including one dedicated to the Nordic network on child trafficking.

The Swedish Gender Equality Agency is part of the CBSS Task Force against Trafficking in Human Beings (CBSS TF-THB), which facilitates exchange of expertise and knowledge development. The Agency also collaborates regularly with the OSCE, the Council of Europe, and participates in the EU Network of National Rapporteurs and Equivalent Mechanisms against trafficking in human beings (NREM).

During 2024 and 2025, the Swedish Government allocated funds to CBSS to strengthen its work against human trafficking. Main activities included, for example, an international conference in Stockholm in December 2025 on Human Trafficking and Organized Crime, aimed at law enforcement professionals. In addition, the CBSS organized training sessions and professional exchanges with law enforcement representatives from Ukraine.

## 10. Role of businesses

- (a) GRETA welcomes the above-mentioned legislation and policies, and invites the Swedish authorities to ensure their consistent application in practice, as well as to further engage with the private sector with a view to raising awareness of the important role and responsibility of businesses in preventing and combating human trafficking and labour exploitation in their supply chains, and to enable scrutiny of their performance in this regard (paragraph 132).

In June 2025, the Minister for Gender Equality convened a roundtable discussion with a selection of governmental agencies, the corporate sector and civil society. The meeting focused on violence in young people's relationships, including sexual violence, and the digital dimensions of violence. Representatives from social media platforms participated in the round table discussion.

Also, in December 2025, the Minister for Gender Equality convened a meeting with representatives from social media platforms, to discuss corporate responsibility, as well as measures needed to better protect

children on social media, with a particular focus on grooming and the sexual exploitation of children.

## Appendix 1 - Follow-up topics specific to Sweden

### 1. Developments in the legal, institutional and policy framework for action against human trafficking

- (a) While welcoming the activities of the National Rapporteur, GRETA reiterates the importance of maintaining a structural separation between monitoring and executive functions, in accordance with Article 29 of the Convention, and invites the Swedish authorities to examine the possibility of designating as a National Rapporteur a separate organisational entity or another independent mechanism for monitoring the anti-trafficking activities of State institutions (paragraph 17).

A National Rapporteur was first established in Sweden in 1998. According to the decision, the National Rapporteur shall be located at national/central level within the Police Authority. The function of the National Rapporteur is today organised within the Stockholm Regional Police. The Swedish Government still considers that the National Rapporteur is independent and able to carry out its functions effectively and free from any undue pressure.

The Government is currently developing a new national Action Plan against prostitution and human trafficking. The Plan aims to prevent and combat exploitation in prostitution and human trafficking for all purposes and to strengthen the protection of persons in vulnerable situations. It will include a clear timeframe and proposals for follow-up. In the budget bill for 2026, the Government has proposed an additional SEK 14 million annually for the Action Plan during 2026, 2027 and 2028.

### 2. Measures to prevent and combat trafficking for the purpose of labour exploitation

- (a) GRETA considers that the Swedish authorities should:

- further enhance co-operation between the relevant agencies by ensuring that the necessary exchange of information is not hindered by the existing confidentiality rules;

New legislation has contributed to the development of joint efforts by authorities to combat crime in the workplace. The cooperating authorities can implement administrative measures targeting specific groups, as

information sharing has increased at the regional centres: [Framgångsrikt år i kampen mot arbetslivskriminalitet - Arbetsmiljöverket](#).

The Delegation against Work-related Crime has presented its final report, Work-related Crime – Approach, Tools and Measures, Continued Work (SOU 2025:25). The report is currently being reviewed within the Government Offices: [Arbetslivskriminalitet - Regeringen.se](#).

Co-operation between nine authorities is at place within the framework of work-related crime (*A-krim*). Since July 2024 there is a new law stating that these nine authorities are obliged to exchange information within their joint authority controls on work-related crime. Additionally, there is a new law since April 2025 stating that certain authorities are obliged to submit information about crime to law enforcement authorities such as the Swedish Police Authority (LUB).

On December 1, 2025, a new secrecy overriding provision was introduced in the Public Access to Information and Secrecy Act (Chapter 10, Section 15 a). The new provision means that information covered by confidentiality for the protection of individuals can be provided between authorities if necessary for the following purposes:

- preventing, deterring or detecting criminal activity
- investigating crimes
- preventing, deterring, detecting or investigating incorrect payments
- preventing, deterring, detecting or investigating fraud and various types of violations.

Before information is disclosed, a balance of interest must be made. Certain particularly sensitive confidentiality is excluded from the scope of application of the provision.

- address the risks of THB for the purpose of labour exploitation by ensuring that law enforcement agencies, labour inspectors and other relevant actors are proactively present in sectors at risk of THB, such as massage salons, nail salons and construction sites, including in situations where workers are being posted by foreign subcontractors, with an eye to detecting potential victims of THB for labour exploitation;

In 2025, within the framework of the National Coordination Against Prostitution and Trafficking, the Swedish Gender Equality Agency launched a task force to prevent and combat exploitation in the Thai-

massage industry. The task force brings together civil society organisations, property owner associations, Thai massage parlours, and other key anti-trafficking agencies to share best practices and develop proposals aimed at improving the conditions for individuals exploited in the industry.

- provide training to labour inspectors, police officers, Border Police officers, prosecutors and judges, including through joint training, on THB for the purpose of labour exploitation and human exploitation, as well as the rights of victims;

The Swedish Gender Equality Agency hosts a website featuring cross-sector research publications on human trafficking. Its main purpose is to provide easily accessible information on human trafficking and thereby enhance knowledge among professionals. [Nationella samordningen mot prostitution och människohandel | NSPM](#)

The Swedish Gender Equality Agency also offers web-based training: [Webbutbildningar | NSPM](#) aimed at professionals and emphasizing the importance of maintaining a victim-centred approach.

As of 2025, the Swedish Gender Equality Agency is conducting a training-of-trainers' program within the Swedish National Referral Mechanism (NRM). This case-based, interdisciplinary training is designed for key stakeholders within the NRM. In 2026, the Agency is preliminary planning to continue implementing trainings and to promote regional training initiatives in cooperation with the County Administrative Boards of Sweden.

As of 2025, the Gender Equality Agency offers a training for the Steering Committees of the Regional Centers against Labour Exploitation, to raise the level of knowledge on trafficking in human beings. The training is conducted in cooperation with the Swedish Police Authority and the Swedish Prosecution Agency. It also includes trainers from the Swedish Police Authority.

- ensure that possible victims of THB among foreign workers are not subjected to deportation until a proper identification procedure has been conducted and that they are provided with all assistance measures to which they are entitled under the Convention;

See answer to questions 2d and 6a.

- ensure that regional anti-trafficking co-ordinators are included in joint inspections conducted by multi-agency teams whenever possible and that trade union representatives are informed of possible cases of labour exploitation detected. When joint inspections are conducted, the role of the Border Police representatives should be clearly defined and the relevant legislative framework should be further developed to ensure that undocumented workers are able to regularise their status;

The regional co-ordinators regularly participate in joint labour inspections, contributing with their expertise on human trafficking through a victim-centred based approach. In 2025, the Swedish Gender Equality Agency is also implementing a project to map current methods and practices in these inspections. The purpose is to identify success factors, highlight areas for development, and collect material for future training initiatives and further improvement in operational work.

- continue to raise awareness among the general public as well as, in a targeted manner, among migrant workers, about their rights and the risks of THB for the purpose of labour exploitation (paragraph 149).

In 2023, the Swedish Gender Equality Agency initiated a campaign, *Before you go*, in cooperation with the Council of Baltic Sea States (CBSS). The campaign provides information on workers' rights in Sweden, and it was distributed in Bulgarian, English, Rumanian, Ukrainian and Polish. [Before you go | Swedish Gender Equality Agency](#)

The Agency also collaborates in the campaign of the Swedish Work Environment Authority *This is what you can do to stop workplace crime*: [Det här kan du göra för att stoppa arbetslivskriminalitet - Arbetsmiljöverket](#)

### 3. Identification of victims of trafficking

- (a) GRETA considers that the Swedish authorities should review the application of the Dublin Procedure to presumed victims of THB and conduct risk assessments in order to prevent victims being returned to the country where they face the risk of being re-trafficked (paragraph 159);

The Swedish Migration Agency has commenced a comprehensive review of Dublin cases with the objective of enhancing the procedures for the identification and management of suspected victims of Human Trafficking. The findings of the report will continue to be of relevance

following the implementation of the Asylum and Migration Pact. The report is expected to be determined by 19 December 2025.

(b) GRETA urges the Swedish authorities to take further steps to improve the identification of victims of trafficking, in particular by ensuring that:

- the formal identification of victims of THB is not made conditional on their co-operation in the investigation and criminal proceedings or the initiation of criminal proceedings;

A residence permit for recovery and reflection may be granted a victim for the purpose of recovery and to ensure that the victim is able to make an informed decision of whether he or she wants to cooperate with the law enforcement authorities. The granting of the permit is not conditional upon cooperation with the law enforcement authorities.

The National Board of Health and Welfare has been tasked to disseminate information and provide competence support to municipal social welfare committees regarding human trafficking and exploitation. Furthermore, the Board is tasked with monitoring the number of applications of residence permits for recovery and reflection, in cases where there is suspicion that an individual is a victim of human trafficking or exploitation. The Board is required to report on the assignment no later than 31 March 2026.

Both the National Board of Health and Welfare and the Swedish Gender Equality Agency have developed educational packages and online training courses on child sexual exploitation, prostitution, and human trafficking. These resources are intended for professionals who may encounter children or adults in vulnerable situations or who are engaged in efforts to prevent and combat such crimes.

See answer for Question 3 a.

- regional co-ordinators against prostitution and human trafficking and the police are provided with sufficient human and material resources in order to be able to increase their efforts towards the identification of victims of trafficking;

In 2024, the number of presumed victims of human trafficking identified by regional coordinators increased for the third consecutive year. Regional coordinators identified 430 presumed victims of trafficking, compared to 414 people in 2023. Of these, 233 people were victims of labour exploitation and 166 people for sexual purposes. 22 children were

identified, compared to 35 children in 2023. The regional co-ordinators fulfil an intermediate function within the Swedish system of support and protection, as being both a strategic part to the County Administrative Boards and an operational part to the general social services of the 290 municipalities. The regional co-ordinators also co-operate with the other Agencies under the umbrella of the National Coordination Against Prostitution and Trafficking in Human Beings (NSPM), placed at the Swedish Gender Equality Agency.

The NSPM is currently conducting a review of the function of the regional co-ordinators. This review includes a risk and impact analysis of the different possible future outcomes, for example those affecting the main target group, presumed victims of trafficking.

- the police and other relevant actors adopt a more proactive approach and increase their outreach work to identify potential victims of trafficking, and regional co-ordinators against prostitution and human trafficking are included in such activities whenever possible;

The new Social Services Act, which entered into force 1<sup>st</sup> of July 2025, represents a paradigm shift whereby social services are given better tools to identify needs early on. Social services must work preventively, and a preventive focus needs to be integrated into all social services activities in all the country's 290 municipalities.

Since 2022, the social welfare committees, in addition to the police investigation directors, can apply for a temporary residence permit for a victim of human trafficking to give the person time to reflect and to decide on their participation in the legal process. Since this change, the number of applications from the social welfare committees has increased, and the majority of these come from the regional co-ordinators.

See answer for Question 3 d.

- regular training on THB is provided to all relevant actors, including law enforcement officers, labour inspectors, immigration officials, and education and healthcare professionals (paragraph 163).

In the framework of the inter-agency cooperation to combat work-related crime, internal and inter-agency knowledge-raising seminars and conferences focusing on human trafficking and human exploitation have been held during 2024. The authorities have also arranged workshops to jointly identify the measures needed to make inter-agency cooperation

against labour market crime more effective in combating human trafficking and human exploitation: [Framgångsrikt år i kampen mot arbetslivskriminalitet - Arbetsmiljöverket](#).

Both the National Board of Health and Welfare and the Swedish Gender Equality Agency have developed educational packages and online training courses on child sexual exploitation, prostitution, and human trafficking. These resources are intended for professionals who may encounter children or adults in vulnerable situations or who are engaged in efforts to prevent and combat such crimes.

See answer for Question 3 e.

#### 4. Assistance to victims

(a) GRETA considers that the Swedish authorities should take further steps to fulfil their obligations under Article 12 of the Convention, and in particular to:

- ensure that victims' access to assistance funded by the state is not made conditional on their willingness to co-operate in the investigation and criminal proceedings;

A residence permit for recovery and reflection may be granted a victim for the purpose of recovery and to ensure that the victim is able to make an informed decision of whether he or she wants to cooperate with the law enforcement authorities. The granting of the permit is not conditional upon cooperation with the law enforcement authorities.

The National Board of Health and Welfare has been tasked to disseminate information and provide competence support to municipal social welfare committees regarding human trafficking and exploitation. Furthermore, the Board is tasked with monitoring the number of applications of residence permits for recovery and reflection, in cases where there is suspicion that an individual is a victim of human trafficking or exploitation. The National Board of Health and Welfare is required to report on the assignment no later than 31 March 2026.

- ensure that regional co-ordinators are promptly informed whenever victims of trafficking are identified in order to co-ordinate the provision of assistance to them;

The National Referral Mechanism (NRM) offers support and practical guidance for professionals who encounter presumed and identified victims of human trafficking. The Manual (the Swedish NRM) provides a general

overview of the support and protection offered in Sweden. The NRM also clarifies the responsibilities for each authority, what actions they are entitled to take in cases of presumed human trafficking cases, as well as the support methods accessible at the Swedish Gender Equality Agency. The NRM can be regarded as a guidance for professionals and authorities and aim to contribute to increased inter-agency collaboration and a better support for presumed and identified victims of human trafficking.

The possibility to establish contact with the regional co-ordinators is voluntary for the victims. The support and assistance can also be offered through contact with general social services.

- ensure that all presumed and identified victims of trafficking in Sweden can receive adequate support and assistance, having regard to their individual needs, for as long as required;

The National Board of Health and Welfare has been tasked to disseminate information and provide competence support to municipal social welfare committees regarding human trafficking and exploitation. Furthermore, the Board is tasked with monitoring the number of applications for reflection periods in cases where there is suspicion that an individual is a victim of human trafficking or exploitation. The National Board of Health and Welfare is required to report on the assignment no later than 31 March 2026.

The Government has commissioned the Swedish Gender Equality Agency, the National Board of Health and Welfare, the county administrative boards and the Swedish Agency for Health Technology Assessment (SBU) to prepare regional and national support for municipalities and regions with the aim to strengthen assistance for people exposed to prostitution, human trafficking for sexual purposes, sexual exploitation in pornography production and distribution, as well as children subjected to trafficking or other forms of sexual exploitation. The assignment includes developing proposals for professional support, as well as knowledge and capacity-building tools for social services and health care. The overall goal is to ensure that municipalities and regions can provide individually tailored exit programmes and specialised support programmes for children, with a long-term focus on protection, recovery and reintegration. The assignment shall be reported in 2027 and 2029.

- ensure availability of specialised assistance for all victims of trafficking, including men and transgender persons, throughout the country;

In June 2024, the Swedish Government adopted an Action Program for 2024-2026 to prevent and combat men's violence against women, violence in close relationships, and honour-related violence and oppression, as well as prostitution and human trafficking. The programme emphasizes that individuals exposed to prostitution are victims of men's violence against women. At the same time, general measures to ensure protection and support also extend to men and transgender persons.

In the budget bill for 2026, the Government proposed allocating SEK 100 million in permanent funding to municipalities and regions to strengthen and develop regional and local efforts against certain forms of violence. The funds will be distributed through a government grant regulation, which explicitly includes exploitation in prostitution, human trafficking for sexual purposes, and other forms of sexual exploitation as forms of violence. According to the regulation, priority will be given to applications for measures that enable individuals to leave violent relationships or situations.

- ensure that all presumed victims, including those identified in immigration centres and in the course of the asylum procedure, are promptly transferred to appropriate housing adapted to their needs;

The Manual serves as Sweden's National Referral Mechanism (NRM) and provides practical guidance for professionals who may come into contact with presumed victims of human trafficking. It outlines six steps to ensure that victims receive appropriate support and protection from professionals in Sweden.

- provide longer-term, sustainable funding for the National Support Programme and NGOs that provide assistance to victims, in order to ensure the continuity of victims' assistance;

Funding for the National Support Programme (NSP) is managed annually by the Swedish Government. In 2024, the Swedish Gender Equality Agency allocated SEK 3.2 million to the NSP, the same amount as in 2023.

- provide training on THB to representatives of municipal services (paragraph 182).

Both the National Board of Health and Welfare and the Swedish Gender Equality Agency have developed educational packages and online training

courses on child sexual exploitation, prostitution, and human trafficking. These resources are intended for professionals who may encounter children or adults in vulnerable situations or professionals who are engaged in efforts to prevent and combat such crimes.

The National Board of Health and Welfare has developed an information sheet intended for social welfare boards and social services, providing guidance on how to apply for a residence permit for a reflection period in the case of presumed human trafficking or human exploitation.

5. Prevention of child trafficking and identification of, and assistance to, child victims of trafficking

(a) GRETA urges the Swedish authorities to ensure more effective and timely identification of child victims of trafficking with a view to providing them with appropriate assistance, and in particular to:

- identify possible victims of trafficking among the children subjected to commercial sexual exploitation;

The Swedish Prosecution Authority's Legal Guidance regarding human trafficking and human exploitation, issued in February 2025 (2025:1), includes guidance on how to identify victims of THB and indicators of possible offences. The Swedish Prosecution Authority also have special guidelines regarding crimes against children (2023:9), issued in April 2023, interviewing/questioning children (2022:3) and guidelines regarding sexual assaults (2024:9). In December 2024 the Swedish Prosecution Authority arranged a workshop focusing on identifying crimes and victims of THB.

In the appropriation directions for 2025, the Swedish Gender Equality Agency was tasked with strengthening efforts against sexual exploitation of children within the framework of its work on prostitution and human trafficking. In the budget bill for 2025 the Government announced to enhance the support for individuals exposed to prostitution, in line with the proposals from the Government inquiry on an [Exit Programme for Victims of Prostitution \(SOU 2023:97\)](#) and the inquiry on protection, support, and care for victims of abuse in the production or distribution of pornography ([SOU 2023:98](#)).

The Government has commissioned the Swedish Gender Equality Agency, the National Board of Health and Welfare, the county administrative boards and the Swedish Agency for Health Technology Assessment (SBU) to prepare regional and national support for municipalities and regions with the aim to strengthen the assistance for

people exposed to prostitution, human trafficking for sexual purposes, sexual exploitation in pornography production and distribution, as well as children subjected to trafficking or other forms of sexual exploitation. The assignment includes developing proposals for professional support, as well as knowledge and capacity-building tools for social services and health care. The overall goal is to ensure that municipalities and regions can provide individually tailored exit programmes and specialised support programmes for children, with a long-term focus on protection, recovery and reintegration. The assignment shall be reported in 2027 and 2029.

- proactively identify unaccompanied and separated children at risk of being trafficked;

Both the National Board of Health and Welfare and the Swedish Gender Equality Agency have developed educational packages and online training courses on child sexual exploitation, prostitution, and human trafficking. These resources are intended for professionals who may encounter children or adults in vulnerable situations or professionals who are engaged in efforts to prevent and combat such crimes.

The National Board of Health and Welfare, together with the Swedish Migration Agency and the Swedish Police Authority, has carried out a three-year government assignment to prevent unaccompanied children from going missing (S2022/03300 (delvis)). The assignment focused on increasing knowledge and developing national guidelines to provide support for how relevant actors can work to prevent unaccompanied children from going missing and how they should act if a disappearance does occur.

In 2022, the Swedish Gender Equality Agency, together with the other Nordic countries, reinitiated the Nordic network against child trafficking. In 2024, during Sweden's presidency of the Nordic Council of Ministers, the Swedish Gender Equality Agency organised a meeting within the abovementioned network against child trafficking, the meeting focused on the thematic area of recruitment of children for criminal purposes.

Also in 2024, and within the framework of the same theme, the Swedish Gender Equality Agency arranged a roundtable discussion with relevant stakeholders, including international guests from France (who presented their work on the Trocadero-case in Paris) on the thematic area of recruitment of children for criminal purposes. The roundtable was one of several activities taking place during the National Conference on Trafficking, arranged annually by the Swedish Gender Equality Agency

and the National Rapporteur on Human Trafficking (placed within the Swedish Police Agency).

In 2024, the Swedish Gender Equality Agency continued to distribute the campaign *Don't let the Silence Speak*, with information about consent from a bystander approach, and on how bystanders can speak up against sexual exploitation and purchase of sexual acts. [Låt inte tystnaden tala - våga säga ifrån! | NSPM](#)

In May 2025, the Swedish Government assigned the Swedish Ombudsman for Children to investigate how criminal networks are exploiting children for sexual exploitation and trafficking for other purposes.

- prevent violence or abuse at places of accommodation for unaccompanied asylum-seeking or irregular migrant children, including the homes for secure institutional care;

The number of unaccompanied children seeking asylum in Sweden has declined significantly in recent years. In 2024, approximately 490 unaccompanied children applied for asylum, compared to more than 35,000 in 2015. This reduction has resulted in fewer municipalities being assigned responsibility for unaccompanied children and a substantial decrease in placements.

The Government has introduced a requirement that staff at Homes for care or residence (HVB) must have at least a two-year post-secondary education exam. The education should focus on social work, social pedagogy, behavioural science, or another relevant field (2025:468). The inquiry into Homes for children and young people, which submitted its report in June 2025 (SOU 2025:84), includes, among other things, proposals for a more individualized care.

In 2024, the Government has appointed an inquiry to reform and review the mission and organisation of state child and youth care., aiming to ensure safe and high-quality care. An important task for the investigator is to propose measures that guarantee the absence of violence, abuse, and sexual exploitation, as well as prevent the use of coercive measures without legal support (Dir. 2024:13).

- take measures to deal effectively with the problem of disappearance of presumed child victims of trafficking from accommodation centres, by providing them with secure accommodation and appropriate services and a sufficient number of appropriately trained supervisors (paragraph 193);

Swedish national guidelines at *Kunskapsguiden* - on how to prevent unaccompanied children to go missing.

This website and its subpages are national guidelines. The guidelines are intended to provide comprehensive support in the work to prevent unaccompanied children from going missing. By children who go missing, we mean unaccompanied children, aged 0–17, who deviate (disappear) from their location, and where the whereabouts of the child are unknown to either the legal guardian or other actors involved in the child's care.

In recent years, deviations and escapes from The National Board of Institutional Care (SiS) have decreased drastically. This is partly due to limited access to electronic communication services and visitations at SiS (prop. 2023/24:81) and greater authority for staff to secure doors during nighttime hours to enhance safety and security at special youth homes (prop. 2024/25:41).

(b) GRETA considers that the Swedish authorities should:

- put into practice a country-wide concept for the protection and support of child victims of trafficking, including access to specialised accommodation throughout the country;

The Swedish social services work for the best interests of children and provides support and care. They are responsible for assessing children's needs and ensuring they receive the help they require. This includes specialised assistance for vulnerable groups, such as children who have been victims of human trafficking.

Decisions to place a child or young person outside their home can be made voluntarily under the Social Services Act (2025:400). If consent for care is not given, care can be ordered under the Act (1990:52) with Special Provisions on the Care of Young People. Depending on the reason a child is placed outside the home, there are different options for various types of accommodation, including foster homes and residential care homes..

See answer to 5 a (exit programmes and specialised support programmes for children).

In June 2025, the Government tasked the Ombudsman for Children with identifying contact channels for support and protection, to be used by children and young people who have been subjected to violence in partner relationships, sexual violence, or sexual exploitation. Also, the Agency for Family Law and Parental Support was assigned with promoting the development of parental support concerning children and young people who are at risk of being subjected to, or have been subjected to, violence in partner relationships, sexual violence, or sexual exploitation

The Swedish Agency for Health Technology Assessment and Assessment of Social Services (SBU) has been tasked with conducting an international and national survey to identify methods for detecting sexual vulnerability, primarily within social services and health care. Furthermore, the Agency has been tasked to carry out an international and national survey to identify methods within health care for the treatment of children and adults who have been sexually exploited for pornographic purposes or under similar circumstances where images or films have been shared. The assignment is planned to be presented as of March 2027.

- review the age assessment procedures, with a view to ensuring that the best interests of the child are effectively protected and that the benefit of the doubt is given in cases of doubt, in accordance with Article 10, paragraph 3, of the Convention, and taking into account the requirements of the UN Convention on the Rights of the Child, General Comment No. 6 of the Committee on the Rights of the Child and the CM/REC(2022)22 (paragraph 194).

As part of the implementation of the EU Pact on Migration and Asylum a review of the processes is underway in order to identify the areas that need to be revised.

In the asylum process, the Swedish Migration Agency (SMA) is responsible for the final age assessment. The applicant has the burden of proof to make his/her asylum claims and identity probable. It is primarily written evidence that is used to assess the applicant's age. Based on the information received, the SMA then decides whether the stated age is probable or not. The SMA must determine both whether the person who applied for asylum has made the stated age probable as part of the identity, and whether a person who has applied for asylum is a child or an adult, i.e. whether the applicant is over or under 18 years of age. If the age has not been made probable, the applicant will be given information about and offered to undergo a medical age assessment.

The National Board of Forensic Medicine is responsible for the medical age assessment. It is voluntary and requires written consent from the

applicant. The process for conducting medical age assessments in Sweden is designed to ensure legal certainty and to consider the child rights perspective. Two radiologists and two dentists independently assess the developmental stages without access to each other's evaluations. In cases of disagreement, the lowest assessed developmental stage is used, reducing the risk of an individual being classified as older. If any of the original assessors cannot determine a developmental stage, a third assessor is engaged to ensure that there are always two independent evaluations. A medical age assessment is a supplement to other evidence of the applicant's identity and is weighed into the SMA's overall assessment of the applicant's age.

## 6. Recovery and reflection period

(a) GRETA welcomes the amendments to the Aliens Act allowing the municipal social services to apply for the recovery and reflection period on behalf of victims of trafficking, and considers that the Swedish authorities should take further measures to ensure that a recovery and reflection period is provided to all foreign persons in respect of whom the authorities have reasonable grounds to believe that they are victims of trafficking, in particular by:

- ensuring that a recovery and reflection period is applied for and granted to foreign victims regardless of whether they co-operate with the law enforcement authorities in criminal proceedings;

The residence permit for recovery and reflection may be granted a victim for the purpose of recovery and to ensure that the victim is able to make an informed decision of whether he or she wants to cooperate with the law enforcement authorities. The granting of the permit is not conditional upon cooperation with the law enforcement authorities.

The National Board of Health and Welfare has been tasked to disseminate information and provide competence support to municipal social welfare committees regarding human trafficking and exploitation. Furthermore, the Board is tasked with monitoring the number of applications of residence permits for recovery and reflection, in cases where there is suspicion that an individual is a victim of human trafficking or exploitation. The National Board of Health and Welfare is required to report on the assignment no later than 31 March 2026.

- providing training to representatives of social services with regard to the purpose of and the procedure for the granting of the recovery and reflection period (paragraph 199).

Both the National Board of Health and Welfare and the Swedish Gender Equality Agency have developed educational packages and online training courses on child sexual exploitation, prostitution, and human trafficking. These resources are intended for professionals who may encounter children or adults in vulnerable situations or professionals who are engaged in efforts to prevent and combat such crimes.

The National Board of Health and Welfare has developed a range of resources to increase awareness and knowledge, for example by producing fact sheets, presentations that provide a short introduction to the subject and the legal framework, as well as an information bulletin on the regulations concerning the reflection period for persons suspected of being victims of human trafficking.

## 7. Residence permits

- (a) GRETA considers that the Swedish authorities should ensure that victims of trafficking, regardless of the form of exploitation, can fully benefit in practice from the right to obtain a renewable residence permit, including on the basis of their personal situation, when a victim is unable to co-operate with the authorities. In this context, GRETA refers to the UNHCR 2006 Guidelines on the application of refugee status to victims of trafficking and GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection (paragraph 204).

All persons who are not Swedish citizens, including potential victims of crime, are entitled to apply for international protection in Sweden. The Swedish Migration Agency has issued procedural guidelines specifically aimed at personnel involved in the protection process, setting out the appropriate methods for examining such cases. The capacity to assess these cases in a manner consistent with international conventions is regarded as highly satisfactory.

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