Exchange of Information in Cases of Trafficking in Human Beings

An Inter-Nordic Analysis

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Danish Police Directorate, National Centre of Investigation

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Abstract

This report covers the findings of a project financed by the Nordic Council of Ministers and executed by the Danish Police Directorate, National Centre of Investigation between 2015 and 2016.

The project uncovers which potentially human trafficking-related information is processed by a number of public authorities across five Nordic countries in their daily case processing and how this information is exchanged between the participating public authorities and the police. Based on this, a short good practice guide is developed and distributed to relevant public authorities. The project is based on empirical data ranging from academic articles to 25 expert interviews and is conducted within the frames of social constructivism.¹

The main findings show that the participating authorities all process information that might potentially be related to trafficking in human beings. Despite this, it is far from on a daily basis that the public authorities detect this sort of information, and they, therefore, seldom find it necessary to file a report to the police. When the public authorities do file a report to the police, the majority request a main point of contact in order for them to assure that the information reaches the right department within the police.

Close to none of the participants have found it necessary to contact other Nordic public authorities concerning trafficking in human beings. If the participating public authorities, however, processed information relevant to other Nordic public authorities, the majority of them would contact the national police. The participating police authorities confirm that they have the mandate to exchange information to other Nordic police authorities that are mandated to exchange information with relevant national public authorities.

The report concludes that three cornerstones are essential in order to exchange information concerning trafficking in human beings: training and education in the indicators of trafficking in human beings, clear channels of communication between the public authorities and the police, and organizational priority towards trafficking within each public authority and police authority.

¹ See Appendix 8 for a thorough presentation of the methodological approach.

The intention of the National Centre of Investigation is, through the project and the distribution of the report, including the good practice, to contribute to the ongoing knowledge sharing and awareness on trafficking in human beings.

1. Introduction

1.1 Aim of the project

- To uncover which potentially human trafficking-related information is processed by the participating public authorities.
- To uncover how potentially human trafficking-related information is exchanged between public authorities and the police.
- Based on this, to develop a short good practice and distribute this good practice to relevant public authorities.
- Through the project and the distribution of the good practice, to contribute to knowledge-sharing and awareness-raising on trafficking in human beings.

1.2 Human Trafficking Across Borders

Ongoing conflicts across the globe and a rising economic gap between the Global North and the Global South have left an increasingly significant number of people in a vulnerable situation.² Globalization and the development within technology and transportation have created a connected world where people easily travel across large geographical distances (Cho, S.Y. *et al.*, 2011). In Europe, the Schengen Agreement constitutes an integrated part of the EU and is characterized by free movement of goods, services, capital and labour (Collett, 2013 & Smartt, 2003).

Trafficking in human beings (THB) is a global phenomenon; it is, however, estimated that the possibility to cross borders unidentified in the EU makes it easier for traffickers to exploit their victims across Europe (Smartt, 2003 & UNODC, 2014). According to Europol “EU nationals are easily trafficked in the EU due to the freedom of movement realized by the Schengen Acquis and the combined low risk of identification and detection”, and “the Schengen area provides a comfortable operating area for

² The Global North is mainly Western Europe and Northern America, the Global South is mainly East and South Asia and Sub-Saharan Africa (UNODC, 2014: 7).

traffickers in human beings and will continue to be exploited” (Europol, 2013: 24).

The growing economic gap between the Global South and the Global North is estimated as being one of the main causes for THB (Wylie & McRedmond, 2010: chapter 1 & UNODC, 2014: 7). The majority of victims of THB are trafficked from poor unstable regions into more affluent and developed regions (Wylie & Mc Redmond, 2010: chapter 1 & UNODC, 2014).³ This also counts for Europe where most victims are trafficked from Eastern Europe to Western and Central Europe (ibid.).

According to Europol, SOCTA 2013,⁴ global inequality pushes migrants to Europe, and differences in unemployment rates and social benefit systems push migrants between European Union member states (Europol, 2013: 11–12). According to Europol “the availability of young labourers and lack of employment opportunities in African, Middle Eastern and East Asian Countries is likely to increase migration flows towards the EU” (Europol, 2013: 24). Social, economic and political instability brings with it high unemployment rates, lack of social security and limited possibilities for social navigation (Wylie & Mc Redmond, 2010: chapter 1 & Vigh, 2007). Migration for some becomes a strategy for social possibility, and deception becomes a means to lure victims abroad. These factors and a demand for cheap products increase the risk of migrant labour exploitation, and “OCGs involved in THB will seek to exploit the strong demand and ready supply of migrants to recruit victims and service labour exploitation markets in prosperous MS” (Europol, 2013: 24).⁵

According to Europol, the “persistent socio-economic inequalities between the developed and the developing world drive human trafficking” (Europol, 2013: 24). As part of a social navigation strategy, migrants and unskilled workers seek towards Europe (Vigh, 2007). The economic crisis and the largest influx of irregular migrants to Europe in decades decrease the possibility for these migrants to be absorbed into the informal economy and increase their vulnerability. Therefore, it is estimated that the limited legal channels to access Europe adds to the potential number of victims of THB (Wylie & McRedmond, 2010: chapter 1).

Add to this that some of the immediate consequences of armed conflict and political instability are increasing migration, mixed flows and vulnerability, which increase the risk of THB (Wylie & McRedmond, 2010: chapter 1). The conflicts in Ukraine, Syria, Iraq, Northern Africa

³ Based on a statistical relation between GDP and number of victims (UNODC, 2014).

⁴ EU Serious and Organized Crime Threat Assessment.

⁵ MS: EU Member States, OCG: Organized Criminal Groups.

and Somalia, therefore, leave no reason to presume that the problem of THB will disappear on its own any time soon.

1.3 Shared Effort Across Borders

Therefore, the purpose of this project is to uncover how public authorities (PA) in the Nordic countries exchange potentially THB-related information in order to contribute to the prevention of THB and the prosecution of human traffickers. Based on this, the purpose is to share knowledge between the Nordic countries on how this exchange of information is facilitated.

It is estimated that an enhanced focus on the exchange of information between PAs in potential cases of THB will add to the strengthening of the cooperation and knowledge within the field.

The project is financed by the Nordic Council of Ministers and executed by the Danish Police Directorate, National Centre of Investigation, and focuses on a cross-sector and inter-Nordic exchange of information between PAs in potential cases of THB.

1.4 Background

In 2009, the Danish National Police, the Danish embassy in Bangkok and the Danish Immigration Service cooperated on an intelligence based project creating an insight into an organized misuse of the Danish visa regulations with the purpose of organizing Thai prostitution in Denmark. During the project, the three PAs exchanged potentially THB-related information leading to several investigations and convictions.

The project created an insight into the systematic misuse of fraudulent references for visa applications and the profile of a typical visa application presumably related to prostitution. This provided the embassy, the Immigration Service and the police with a basis for identifying “suspicious” visa applications and visa reference persons.

1.4.1 Project Thailand

Throughout the project, the embassy sent a total of 336 relevant visa applications to the police.⁶ Upon their arrival and departure, the applicants were shortly questioned by the police, and a number of controls were conducted at the presumed residences of the applicants, during which they were further questioned.

Throughout the project, inspections were carried out at brothels with Thai nationals where all Thai women with Danish visas were questioned. The information about the visa reference persons and the applicants was compared with the police registry, and the information from their visa applications (name, age, employment, number of visits to Denmark, reference, finances etc.) was registered. A significant percentage of 9% of the 336 women had relations or presumed relations to organized prostitution.

The project showed how daily case processing for PAs could be related to potential THB and prostitution and how a cooperation between authorities contributed to the action against THB. Following this one project not too many similar projects have been conducted. Therefore, this forthcoming project aims at creating awareness within the participating PAs towards the fact that they might process THB-related information that could be relevant to the police. A good practice concerning the flow of potentially THB-related information between PAs and the police should contribute to the awareness.

1.5 Exchange of Information

The hypothesis is that the police will be able to receive information from other national PAs and either initiate investigations or, if needed, facilitate the exchange of this information to other relevant Nordic police authorities and thereby potentially to other relevant Nordic PAs. If necessary, the police would furthermore be able to facilitate the exchange of knowledge to relevant PAs on new trends seen within THB and thereby new areas of attention.

By means of the project and the good practice, it is the aim to raise awareness about THB in the daily case processing of the participating stake-holders and awareness about the fact that the information could be shared with the police who, to the legal extent possible, could share

⁶ The applications were identified as relevant based on a specific profile made by the police with an outset in former investigations.

the information with other relevant authorities. The inter-Nordic dimension should contribute to uncovering how potentially THB-related information could be exchanged between Nordic PAs, if necessary.

It is the intention of the National Centre of Investigation that this project should contribute to the sharing of knowledge and cooperation between PAs in the Nordic countries and thereby help strengthening the action against THB, not just for sexual exploitation, but also for the relatively “new” types of THB for labour exploitation and criminal exploitation.

1.6 Structure of the Report

Section 2 presents the main findings from each country, general findings and some remarks concerning the good practice.

Section 3 of the report will give a short overview of some of the main characteristics of THB in the EU.

Section 4–8 will present the results of the interviews conducted.

Section 4–5 present the information potentially relevant to THB as stated by the representatives in the questionnaires.

Section 6 captures how THB information is exchanged between the PAs and section 7 how THB information is exchanged between the PAs and the police authorities.⁷ Both sections are divided into subsections covering each country listing each participating authority separately. The results from each authority are further subdivided into two subsections, the first covering the national exchange and the second the Nordic exchange of information.

Section 8 lists findings under the headings *Internal Organization Concerning THB*, *Highlights*, *Challenges* and *Potentials* referring to each country separately.

Section 9 includes the good practice, and section 10 the conclusion.

Eight appendixes are attached covering a figure visualizing the flow of information, examples of questionnaires, cases and an interview guide, an overview of invited PAs and last, but not least the methodological approach chosen.

Appendix 8 covering the methodological approach is a small report in itself, including the most central methodological considerations and choices.

⁷ “THB information” is used interchangeably with “potentially THB-related information”.

2. Main Findings

This section will list the main findings of the project. The main findings from each country separately will be listed at first. Then general common findings will be listed and discussed, and a few ideas for possible future initiatives will be given based on the main findings. Last, a few remarks will be given on the good practice presented in section 9.

2.1 Iceland

All the participating PAs from Iceland are in their daily case processing handling information that could potentially be related to THB. The participating authorities are all aware of THB and the fact that their work might potentially reveal indicators of THB. Part of the reason for this awareness is the training provided by the Reykjavik Metropolitan Police in indicators of THB and information relevant to the police concerning THB.

Overall the need for exchange of THB information between the PAs is quite limited. When information is exchanged, it is done by e-mail or phone to the contact person from the (in)formal groups. None of the PAs, except from the police, have experienced the need for contacting other Nordic authorities regarding THB. Should such a need arise, the other PAs would contact the Icelandic police for them to facilitate the contact. The police can easily facilitate exchange of information to other Nordic police authorities via the international police cooperation.

None of the participating authorities have a specific procedure for how to exchange THB-related information to the police. Some of the authorities have internal procedures on how to report potentially THB-related information internally, e.g. to specific THB responsible employees. All of the participating authorities know exactly who to contact how in the police, when necessary, as the THB contact person has been the same for some years.

According to the police, the authorities can file a report to any police station, as the stations always contact the THB department in Reykjavik who will assist during the investigation.

At the moment the police are establishing a communication network including a list of key persons. The key persons should be in charge of

the exchange of information with the police, even concerning minor suspicions. The police have also appointed a key person in charge of receiving THB information.

The informal-always-open approach from the side of the police makes it possible for the authorities to contact the police concerning suspicions, which seems to make it easier for the authorities to know when to file a report.

The participants meet often in both formal and informal groups in order to discuss previous and current cases. These groups are highly validated as the contact persons actually meet each other, which makes it easier to just call when they have a case. The participants of the formal Steering Group on THB are in most cases also those in charge of exchanging information. Most of the participants are the same in the different groups, which makes it easy to meet and discuss. All of the participating authorities know who to contact in each authority and underscore the importance of continuity.

The participating authorities from Iceland in general request more information about trends and THB cases in other Nordic countries, more national information sharing and to some extent a list of appointed THB contact persons in all PAs accompanied by formal procedures.

2.2 Finland

All the participating PAs from Finland are in their daily case processing handling information that could potentially be related to THB. The focus on THB differs from authority to authority where some have an explicit focus on THB and appointed THB key employees and guidelines, while others have no focus on THB. Few have training programmes for employees concerning indicators of THB.

Some of the authorities are expressing a need for exchanging information to other PAs, which is facilitated via the central foreign register.

The Ministry of Foreign Affairs is the only PA having experienced a need for contacting other Nordic authorities concerning potentially THB-related information. This is done through the Finnish police or the Border Guard.

If a need would arise for exchanging information to other Nordic authorities, the majority of the participating authorities would contact the police for them to facilitate the contact. The police confirm that they would be able to contact both other Nordic police authorities and other Nordic PAs concerning THB-related information.

Some of the authorities have a procedure for the overall handling of THB cases and for how to contact the police concerning THB.

Some of the participating authorities would contact other PAs who would then, if necessary, contact the police. Some of the participating authorities have appointed THB key employees and a main THB contact point.

Some of the authorities would contact the National Bureau of Investigation via their main THB mail address, and some would contact the local police.

According to the police, the other PAs could contact whichever police station in Finland with THB information as each district has employees knowledgeable about THB. As a default an e-mail could be sent to the National Bureau of Investigation.

The majority of the participants highlight the central foreign register (the UMA database) as an easy and efficient way of exchanging information between the PAs. The register includes information about third country nationals regarding name, ID and any application or permit given. Each authority has access to the information necessary for their field of work, and the police have access to all information entered. This means that a concrete exchange of information is not necessary as the authorities will just call the police and point their attention towards potentially THB-related individuals. Some participants, however, underscore that the register leaves no room for sending message or entering additional information, and therefore the police will have to be informed about the potential THB case in some other way, e.g. by e-mail.

Some of the participants describe it as a challenge when they need to contact the police concerning potentially THB-related information. They are sometimes sent back and forth between different departments. Some of the authorities contact the Border Guards rather than the National Police concerning THB. There seems to be quite a geographical variation in how the exchange of THB information to the police is facilitated.

In general, the PAs are requesting more information and training in the indicators of THB, a key point of contact concerning THB in the police and more multi-official working meetings on THB.

2.3 Denmark

All the participating PAs from Denmark are in their daily case processing handling information that could potentially be related to THB. The majority of the participants express some degree of focus on THB, some

have had training, some have procedures, some have appointed specific THB key employees, but there is a general concern that the caseworkers know less about THB than the strategic level employees.

Some of the authorities have had the need to contact other national PAs concerning THB. Some PAs mention that they cannot contact other national PAs directly concerning THB, but would depend on the police for doing it.

Few of the representatives have experienced a need for exchanging information in relation to THB to other Nordic authorities. Some of the representatives would, if the need arose, contact the Immigration Service for them to facilitate the contact, others would establish the contact themselves, and others again would contact the police for them to establish the contact. The police are able to exchange information to other Nordic police authorities through the international police cooperation and presumably through these to other Nordic authorities.

The majority of the representatives mention different national and local multi-official groups where they meet and discuss THB on a strategic level as an opportunity for creating contact points in other PAs.

The majority of the authorities only seldom contact the police concerning THB, and few have procedures for how to exchange information with the police. Some of the authorities would contact the local police with information on THB, often based on previous cooperation. Others contact the National Centre of Investigation. According to the police, both the National Centre of Investigation as well as any district could be contacted regarding THB information as each district has a minimum of one THB-responsible officer.

In general, it is not considered difficult to contact the police and exchange information. However, some of the representatives highlight difficulties with filing a report to the police if the case is crossing district borders.

The majority request one point of contact concerning THB in the police. Some suggest making a list of THB contact points in all relevant PAs. In general, the participating authorities request more information on THB indicators and more information on what information could be relevant for the police. Furthermore, meetings are requested where the relevant employees meet each other.

2.4 Norway

All the participating PAs from Norway are in their daily case processing handling information that could potentially be related to THB. Few of the participating authorities have internal THB referral mechanisms or training in THB indicators.

Some of the authorities, when contacting other national authorities concerning THB, contact them via the police.

The participating authorities have never experienced a need for contacting other Nordic PAs. The majority of the participants explained that they would contact the national police if they had THB-related information that could be relevant for other Nordic countries. The representative from the police confirmed that the police would be able to facilitate the exchange of information, if necessary, through the international police cooperation.

The majority of the participating authorities only seldom have the need for contacting the police regarding THB. The majority of the participating authorities have no written procedures for how to contact the police, but would most often contact the local police regarding THB information. Some would contact the National Criminal Investigation Service.

According to the police, both the local police stations and the THB unit at the National Criminal Investigation Service could be contacted concerning THB information.

The majority of the participating authorities are represented in the KOM network and consider this a good forum for meeting other relevant authorities.⁸ In the network, the participants discuss trends, not individual cases. However, contact points for contact regarding individual cases are established during the meetings in KOM.

Some of the PAs mention the positive side effect of cooperation between PAs in other areas than THB, establishing the information channels and making it easier to create contact.

In general, a need for training and written procedures was expressed and there seems to be quite a few upcoming initiatives in the area.

⁸ See section 5.4.2.

2.5 Sweden

The participating PAs from Sweden are in their daily case processing handling information that could potentially be related to THB. One of the authorities has an internal THB referral mechanism, and two of them do trainings for the employees in THB indicators.

Some of the participating authorities stress that the law of secrecy hinders the exchange of information between PAs in individual cases.

None of the participating authorities have had the need to exchange information to other Nordic authorities. If they had the need, they would contact them themselves through their own agency. The police would, however, have the possibility to facilitate the exchange, if necessary.

One of the participating authorities has a guideline for how to contact the police with THB information. The PA would contact the local police with potential THB information related to individual cases.

According to the police, other PAs could give THB-related information to any unit in the police. The police would themselves make sure that the information was directed to the regional level, being in charge of THB investigations. As a default the national level could be contacted.

According to the representatives, there are few forums with an explicit focus on THB. However, other forums and working groups are mentioned with other focuses than THB, but relevant to THB.

There is a general request for having more PAs participating in the action against THB.

In general, the participants express a need for training of employees in the PAs in the indicators of THB.

2.6 General Findings

From all of the five countries the participating PAs are handling information in their daily case processing that could potentially be related to THB.

However, this does not imply that the different authorities get suspicious about THB on a daily level. The overwhelming majority of the representatives explain that the authority they represent only seldom experiences a need for contacting the police with information that might potentially be related to THB and could contribute to or initiate an investigation.

Only very few of the authorities have a procedure for how to contact the police with THB information, which by most is explained by the fact that the need for this is very rare.

Furthermore, some participating authorities experience challenges when they need to contact the police concerning THB and request a national contact point for information.⁹

The overall picture is that the channels of information do exist, but are unknown to most as they are only needed very seldom.

The same goes for the inter-Nordic exchange of information in relation to THB. All, except very few, of the participants have never experienced the need for contacting other Nordic authorities in relation to THB. However, the channels exist.

The need for contacting the police or other Nordic authorities with THB-related information may be limited simply because the PAs very seldom come across this sort of information. However, a general concern as to whether the employees of the participating authorities know about THB was raised by quite a few of the participants.

Furthermore, the participants estimated that there is a general need for information about THB indicators and correlated what information is relevant for the police in order to carry out investigations. Therefore, it seems to be in place to set forth a recommendation for training on THB indicators across relevant PAs.

Another general need expressed in all the participating countries is the need for more forums, cooperation, working groups and similar with an explicit focus on THB. Without exception where such forums exist they are very much appreciated, as they create contact points and inter-official awareness among the participants. Therefore, it further seems to be in place to set forth a recommendation for establishing more forums with an explicit focus on THB and where they exist, to consider including more PAs in the action against THB.

2.7 Remarks about the Good Practice

The main purpose of the good practice is to make sure that the PAs are provided with a default point of contact at the police in each country. This is due to the fact that the majority of the participating authorities have expressed a need for such a point of contact and some have experienced challenges regards contacting the police.

Add to this the fact that the police have the legal mandate to contact and include any relevant authority in an investigation, gather and collect

⁹ In order to meet this difficulty the *good practice* lists default contact details to the national THB coordinators in each police authority.

all information relevant and exchange information across borders. The police as such appear to be an epicentre of contact making the impossibility of contacting them quite an unfruitful obstacle. This obstacle could partly be overcome by simply distributing the contact details for someone who would receive and take responsibility for THB information, now done through the good practice.

The good practice also summarizes some of the processes concerning exchange of potentially THB-related information as explained by the representatives and mentioned as contributing to a smooth exchange, mainly, training in THB indicators, the appointment of THB coordinators and participation in THB forums.

Due to the contact details entailed, the good practice could be shared by any relevant employee at any level in any of the participating authorities. It is, however, estimated that the examples of processes are aimed primarily at supervisors of caseworkers who would have the possibility of adjusting their own procedures inspired by the listed examples.

3. Trafficking in Human Beings

“Human trafficking is believed to be the world’s second largest illegal economy”

(Norwegian Ministry of Justice and the Police, 2011:6)

3.1 International Definition

In a global and European context, THB is defined by the “Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children”, which constitutes an annex to the “UN Convention Against Transnational Organized Crime” (UN Convention, 2000). According to the Protocol (referred to as the “Palermo Protocol”) THB is defined as:

“Article 3 (a) “Trafficking in Persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of, exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude, or the removal of organs; (b) The consent of a victim of trafficking in persons to the intended exploitation set forth in subparagraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used; (c) The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve any of the means set forth in subparagraph (a) of this article; (d) “Child” shall mean any person under eighteen of age” (UN Convention, 2000: 42–43).

3.2 Human Trafficking in the EU

In a European Union context statistical data related to THB are gathered by Eurostat (Eurostat, 2015). According to Eurostat 30,146 victims were identified in EU28 between 2010–2012 (Eurostat, 2015).^{10, 11}

According to Europol “shifts in routes and movement patterns may involve the increasing targeting of EU citizens for their trafficking to emerging markets for sexual or labour exploitation” (2015: 8).

3.2.1 *Trafficking between Member States*

65% of the 30,146 identified victims in the EU were citizens of an EU member state (Eurostat, 2015: 11). The five most common citizenships of the victims from EU countries are Romania, Bulgaria, the Netherlands, Hungary and Poland (ibid.). 80% of the identified were female, 55% were under the age of 25,¹² 69% were trafficked for sexual exploitation, 19% for labour exploitation and 12% for other forms (Eurostat, 2015: 10–11).

According to UNODC, approximately 1.5% of the detected victims in Western and Central Europe were exploited for begging, and 1% for crime (UNODC, 2014: 62). Other modi than sexual exploitation and forced labour registered by UNODC are forced marriages, welfare fraud and exploitation of children for the production of pornographic material (2014:62).

According to UNODC, a majority of the identified victims worldwide are not citizens in the country where they are exploited and identified, which means that most victims have been trafficked across state borders (UNODC, 2014: 8). A majority of the victims are trafficked for sexual exploitation and there is an increase in THB for different categories of forced labour (UNODC, 2014: 9).

Victims coming from the Balkans and Central Europe are mainly trafficked to Western and Southern Europe with “significant inflows from the Balkans (27%) and from Central Europe (13%)” (UNODC, 2014: 62). UNODC estimates that “six in ten victims detected in Western and Central Europe are citizens of countries within the subregion” (2014: 62).

¹⁰ The 28 member states of the EU contributing to the statistics in the report.

¹¹ It should be stressed that national definitions and recording methods differ from country to country and that it is estimated that more THB victims remain unidentified. Therefore, a rise in the number of THB victims may not necessarily equal more victims, but is influenced by legislative changes, changes in registration practice, specific law enforcement projects and similar (Eurostat, 2015).

¹² Based on data from member states that were able to breakdown the data in age categories (Eurostat, 2015).

Accordingly, victims identified in Western and Central Europe are mainly from the surrounding countries, but also from 130 other countries (ibid.). Making the region a major destination region for “transregional trafficking”, mainly from West Africa (UNODC, 2014: 65).

3.2.2 The Trafficker

69% of suspected traffickers between 2010–2012 were EU citizens,¹³ primarily from Bulgaria, Romania, Belgium, Germany and Spain (Eurostat, 2015: 12). Compared with the numbers from UNODC, there seems to be a certain degree of subregional THB.

According to the UNODC regional overview, in Western and Southern Europe compared with other regions, less traffickers commit the crime in their country of citizenship, whereas in the Balkans and Central Europe the perpetrators are mainly nationals of the country they commit the crime in (UNODC, 2014). The traffickers are mainly male, with approx 23% of the convicted being female (UNODC, 2014: 61). Further, there seems to be some national correlation between the victims and the traffickers (UNODC, 2014).

A report published by the British Centre for Social Justice (CSJ),¹⁴ interviewing European police officers uncovers some of the current trends in THB (Centre for Social Justice, 2015). The report finds that in several parts of Europe THB is orchestrated by OCGs that specialize in profiting the Internet and the borderless Schengen Area (ibid.). According to the report, OCGs are involved in most exploitation forms (ibid.).

The report highlights poverty as one of the main reasons for THB-victims to fall prey to the OCGs and end up in a situation of exploitation and concludes that there is no such thing as a “standard trafficker” as “they range from truck drivers and village “aunties” to labour brokers and police officers” (Centre for Social Justice, 2015: 15).

Aside from the OCGs, previous research and cases of THB show that single individuals can also be traffickers and exploit a number of victims (UNODC, 2014). According to UNODC Trafficking in Persons report from 2014, the level of organization and number of traffickers, among other things, depend on whether or not borders are to be crossed in order to reach the destination country, as crossing borders requires more planning (UNODC, 2014). Therefore, once inside, the

¹³ Based on data from member states that were able to provide data on traffickers (Eurostat, 2015)

¹⁴ The report was made after the UK passage into law of a Modern Slavery Act. The term “modern slavery” is used by the CSJ and the UK Government instead of “Trafficking in Human Beings” (Centre for Social Justice, 2015: 1).

easiness of travelling between Schengen countries must not be underestimated, which highlights the relevance of a cross-border exchange of information between PAs.

3.2.3 *By Means of Legal Channels*

It is estimated that perpetrators exploit legal channels, such as tourist agencies and visa offices, to facilitate illegal immigration into the EU (Europol, 2013: 15). According to Europol “OCGs involved in the facilitation of illegal migration and THB often use counterfeit documents as part of their modus operandi” (Europol, 2013: 17). The counterfeit documents among others include passports, national identity documents, EU residence permits, birth certificates, invitation letters and marriage certificates (Europol, 2013: 17). According to the SOCTA report from 2013 “[a]ny kind of identity document and any other type of document can be purchased on the internet” (Europol, 2013: 17).

3.3 The Trafficker and the Victim

Through the Internet, OCGs can manage more victims and operate relatively undetected in more countries simultaneously (Europol, 2014). According to Europol, the Internet increases the number of potential victims, as traffickers can reach out and recruit victims under cover of being recruiting agencies or dating sites (Europol, 2014).

Victims lured into sexual exploitation are often offered job opportunities in “administration, cleaning or child care” and victims of labour exploitation are promised jobs in “agriculture, collecting and delivering charity bags, construction, the cleaning or transportation sectors” (Europol, 2014: 2). Victims are often being blackmailed or controlled through digital platforms and also the transportation is often facilitated through the Internet (Europol, 2014).

3.4 The Demand of Tomorrow

According to a report on the organized crime of tomorrow (Europol, 2015), the growing economic gap between EU member states together with the growth of the middle class in the BRIC countries will create an

increasing demand for cheap counterfeit goods,¹⁵ and as a result “OCGs producing counterfeit goods may also increasingly rely on illegal labour exploitation to bolster their workforce” (Europol, 2015: 26). In relation to this, it is also estimated that the growing middle class in the BRIC countries will add to the increase of sexual exploitation, as European women will be sent to these new emerging markets (ibid.).

It is further estimated that the “economic disparity in the EU may result in an increase in facilitated immigration and the trafficking in human beings for exploitation in labour, the sex trade and forced criminality”, and that “it is conceivable that sustained or growing economic disparities within the EU may prompt a similar shift to intra-EU trafficking for labour exploitation and exploitation in forced criminality” (Europol, 2015: 26).¹⁶ It is estimated that the disparity will result in citizens with low income becoming prone to exploitation (ibid.).

3.5 The Role of the Public Authorities

According to Europol, the OCGs specializing in THB will find their way into legal structures in an increasing degree in terms of offering themselves as sub-contractors (Europol, 2015).

Europol estimates that organized cybercrime groups will be able to provide even more comprehensive identity packages in the future, which will be for the benefit of OCGs involved in THB, as they can provide “trafficking victims with new identities complete with all the information necessary to avoid risk profiling or law enforcement counter-measures upon entry to the EU or during secondary movements” (Europol, 2015: 20). This highlights the need for PAs to be focused on how to cooperate in order to prevent THB and expose identity fraud.

As THB is a transnational crime, its explanations and causes might be social, migratory, conflict-related or economic, whereas the means to eradicate or reduce it must be found within international and inter-Nordic cooperation (Shelley, 2007).

¹⁵ The emerging economies of Brazil, Russia, India and China.

¹⁶ Similar to the tendency that “victims of sexual exploitation are increasingly trafficked within the EU” (Europol, 2015: 26).

4. Information Important to the Police

This section is the first of the sections presenting the results of the interviews.

The section presents the information estimated by the interviewed police officers as relevant to the police in order to initiate investigations against human traffickers. The information is quoted precisely as it was written by the representatives in the questionnaires. It is copied from their questionnaires into the report and is therefore written as quotes.

Each quote corresponds with the representative from the police unit and country as stated above the quote. The first quote is accordingly the information estimated as relevant by the representative from the Reykjavik Metropolitan Police in Iceland.

The result from Denmark is not a direct quote as it was originally written in Danish by the representative and therefore translated into English for the report. It is accordingly written in a different text format than the quotes.

This information is presented in the first of the five results sections in order to set the frame for the rest of the report, as the information important to the police is the information that should ideally be exchanged from other PAs to the police.

The purpose of presenting the information is to create an opportunity for all of the participating Nordic police authorities to share knowledge as to what information might be relevant for initiating investigations, and also to create awareness for the other participating PAs as to which information might be relevant for the police in connection to THB.

4.1 Iceland

4.1.1 *The Reykjavik Metropolitan Police*

“Information regarding cases from other authorities are vital for Iceland. We would like to access more information about human trafficking trends and what is happening around us in the Nordic countries. It has

been very good to attend meetings and conferences regarding the issue and we have been trying to keep contact with persons met in these conferences to stay up to date with trends and case studies from other countries. What we need is a database, newsletter or any other form that human trafficking experts in the Nordic countries can give information to each other and stay up to date with what is happening around us. We have in recent years seen that human trafficking is ongoing in Iceland and we are still forming the government action against the issue.”

4.2 Finland

4.2.1 *The National Bureau of Investigation*

“Pieces of information received from other authorities may lead to initiating investigations or preventing THB crimes from developing or preventing people from ending as victims of human trafficking. For example, the Finnish Embassies under the Ministry for foreign affairs might receive information from Embassies representing countries in the host countries or the public informing about possible abuse of individuals when entering destination country. This could be used to prevent THB from taking place or to find places where exploitation happens. (...) New possible cases of HT are referred to the officials of the system by law enforcement authorities, NGOs and lawyers representing their clients. Those cases that aren’t yet known by police in the first place will be delivered to the police if there’s not urgent need, after certain reflection period.”

4.3 Denmark

4.3.1 *The National Centre of Investigation*

Immigration Service: visa applications, family reunifications, visa reference. Tax Administration: income, property, debt, business, employees, vehicles, assets. Danish Centre against Human Trafficking: information about victims and perpetrators, how, who and for what.¹⁷

¹⁷ Translated from Danish.

4.4 Norway

4.4.1 *The National Criminal Investigation Service*

“Bank information, Air companies – passenger lists etc., secure cameras, labour inspectors, Norwegian labour and welfare service, treasure, Custom.”

4.5 Sweden

4.5.1 *The Department of National Operations (Police)*

“The Migration Agency, County Administration Board Stockholm, The Swedish Tax Authorities, The Swedish Custom, The Social Services in the municipalities, The General Prosecutor Office. You have also the Civil Societies Platform (NGOs).”

5. Potential THB Information

The previous section presented information considered important for the police in order to initiate THB investigations. This section will now list the information that – in the questionnaires – was estimated by the representatives from the other participating PAs as information processed that could potentially be relevant for the police in order to uncover modus and trends within THB.

The information is quoted precisely as it was written by the representatives in the questionnaires. It is copied from their questionnaires into the report and is therefore written as quotes.

Each quote corresponds with the representative from the PA and country as stated above the quote. The first quote is accordingly the information estimated as relevant by the representative from the Directorate of Labour in Iceland.

The results from Denmark are not direct quotes as it was originally written in Danish by the representatives and therefore translated into English for the report. It is accordingly written in a different text format than the quotes.

The information estimated by the representatives from the other PAs as potentially being related to THB is not entirely identical with the information requested by the police.

The intention of presenting this information is to further help setting the frames of the report, as this information is the information that the representatives estimate might be relevant for the police and the information they will, therefore, be referring to when they – during the interviews – talk about information that they could exchange to the police.

The intention is for all the other Nordic PAs to gain an insight into the potentially THB-related information processed by other sectors or by equivalent sectors in other Nordic countries, as they might recognize some of the information from their own case-processing.

The participating PAs are chosen based on the fact that they might process information relevant to THB. Therefore, this section will highlight the fact that the participating authorities are attentive towards the fact that they might process THB-related information that could be relevant to the police.

5.1 Iceland

5.1.1 *The Directorate of Labour*

“The Directorate of Labour issues work permits to individuals who come from countries outside the EU Area and handles and controls, Act on the Rights and Obligations of Foreign Undertakings that Post Workers Temporarily in Iceland and on their Workers’ Terms and Condition of Employment, No. 45/2007 and Act on Temporary-Work Agencies, No. 139/2005. In relation to this work the Directorate receives various information and documents that can be useful in order to screening for human trafficking.”

5.1.2 *The Directorate of Immigration*

“When applying for residence permits applicant needs to provide the Directorate with a lot of information. Addresses can in some cases be relevant, both addresses abroad and in Iceland. Information about financial income, bank accounts and tax reports. Interviews taken in some cases, mostly asylum and family reunification cases. Trends in family reunifications. What the staff at the reception notices when applicant arrives. The Directorate sometimes also receives outside information that can be relevant. Also (...) how the application is filled out, trends in where applicants are going to live, trends in workplaces etc. History of disappearing au-pairs and references to same persons in applications for visa or residence permits are all handled by the Directorate. In asylum cases the Directorate receives police reports regarding asylum applications and takes interviews with the asylum seeker. That information is also relevant.”

5.1.3 *The Ministry of Welfare*

“The Ministry’s main link to victims is through the local social services. Most often, the Ministry gets information about potential victims from the staff of Reykjavík municipality but we might as well get information from the Primary Health Care. At least we might get information from the Directorate of Labour. The role of the Ministry in the field is to ensure that victims have access to appropriate welfare services. The social workers, who work for the local social services and handle single cases, are in better position than staff in the Ministry to identify modus and trends within the field (...).”

5.2 Finland

5.2.1 *The Ministry of Employment and the Economy*

“TE-office: work permit applications, information about working contract terms, paid salaries etc. ELY-centre: processing the salary guarantee applications (possible illegal working may appear).”

5.2.2 *The Occupational Safety and Health*

“For example working hours reports, wages and information that the employees have given during the inspections.”

5.2.3 *The Immigration Service*

“Asylum interviews include information that police may not have. Sometimes indications of trafficking do not come up in the police hearing before the asylum interview but in later stage – in reception centre, asylum interview or appeal process. (...). Specialist receives also denunciations about illegal immigration, work permits, and work conditions. These may contain indications of human trafficking. Modus and trends of illegal migration, smuggling and human trafficking may overlap, which requires attention and information sharing within the Immigration Service.”

5.2.4 *The Ministry of Foreign Affairs*

“All applicants registered and checked with the National visa register, VIS-register, SIS, and several national registers: police, immigration, border guards. After register controls the visa application is examined according to information received in the Local Schengen Cooperation (trends, use of middlemen) and information received from the Finnish Central Authorities (individual cases and trends). (...) In the countries of origin or transit there are certain trends for irregular immigration when people are trying to misuse legal ways of immigration (visas, residence or work permits) to human trafficking, extra low work or forced work. Fake travel document are not very often used but false or falsified supporting documents are. In the high risk countries our Embassies have to control these documents with the issuing authority: bank statements, university certificates, family registrations, income tax paid etc.”

5.3 Denmark¹⁸

5.3.1 *The Danish Working Environment Authority*

Information detectable during inspections or information gained through questions about the psychological working environment. It could e.g. be employees living at the construction site. Sometimes we meet employers who keep the documents (passport, social security card, credit cards) of the employees.

5.3.2 *The Danish Centre against Human Trafficking*

Information obtained during the victim identification process. Information obtained during the work and contacts in Drop In Centres, streets and massage parlours/brothels. Information obtained from the victims during the repatriation dialogue.

5.3.3 *The State Administration*

Information from the CPR-registry.¹⁹

5.3.4 *The Danish Agency for International Recruitment and Integration*

Information from applications for green card. Information from applications for au pair contracts. Information about third parties doing applications for others. Information about similar filled out applications referring to the same employer. Information about suspicious work relations where e.g. the housing is part of the contract. Information about more foreigners living at the same address. Suspicion about applications where the applicant has not filled out the application form him/herself.

5.3.5 *The Tax Administration*

Information from an excel sheet where reports and THB-related information is stored. Information from an excel sheet concerning brothels. Relevant economic information from the tax system.

¹⁸ All the Danish contributions are translated into English from Danish and are therefore not cited as direct quotes.

¹⁹ CPR: national registry of Danish citizens.

5.3.6 *The Visa Office/Immigration Service*

In the processing of visa applications, the Immigration Service sometimes receives information about female applicants wishing to visit a private person in Denmark. This person could later turn out to be inviting many girls from e.g. Thailand and the Philippines and to be well known for procuring. In these cases, however, it is often the police who detect the misuse of visa during controls. The Immigration Service also processes visa applications from applicants wishing to visit a Danish company. These applicants often apply for extension of their visa and during the processing of this, the Immigration Service sometimes get a suspicion of illegal work. Information received from identification forms filled out by the victim.

5.3.7 *The Citizen Service, Visa and Passport/Ministry of Foreign Affairs*

Information obtained during the processing of visa applications in the different embassies. If in doubt, the embassies often send the application to the office for "Citizen Service, Visa and Passport" where all information about the applicant and the reference is screened. Information about family, work, studies, economic resources, the relation between the applicant and the reference and similar.

5.4 Norway

5.4.1 *The Labour Inspection Authority*

"During inspections, and especially those with focus on social dumping, the inspectors talk to workers or try to talk to workers, we observe how the working conditions and localities are, and we try to observe the relations between workers and leaders. The Employers are asked to hand out/to send us documentation – contracts of employment, time sheets, pay cheque. We also try to identify which country the workers come from, and if they may be working illegally in Norway. Relevant information may be: Work places or multiple work places who use workers from nationalities we know to be more vulnerable than others (e.g. Asia, Africa, the poorest countries in Europe) and where we suspect they have very low payment, very long working hours, maybe 7 days a week and bad working conditions, especially when they don't want to talk to us, or seem to be afraid. As over when they obviously live at the work place

(mattresses). When we have been given documentation that indicate conditions as described over, and we also get the impression that the workers not easily can quit the work (...). When we before, during or after inspections get information from workers and others about patterns of recruitment or that the employer have taken their travel documents, or that the employer are managing their bank accounts, or that they are being threatened, harassed, or that they have been deceived by the employer/network of persons. The LI may get information or see indications that a work place/an employer may also be connected to grave economic crimes, prostitution, smuggling/selling of drugs and other kind of more organized crimes. The LI can give examples of what kind of work places, or branches where workers are most vulnerable to grave exploitation, what nationalities that seem most vulnerable and if there seem to be patterns where workers from some countries are more likely to be found in some work places than others.”

5.4.2 *The Coordinating Unit for Victims of Human Trafficking (KOM)*

“KOM’s overall function is to be “a prime driving force for cross-disciplinary cooperation” (as stated in the previous national action plan, see measure no. 5) According to the mandate, KOM shall have an inter-agency/cross-disciplinary focus and be an instrument for improving co-ordination between authorities and organisations. KOM’s annual status report provides an overview of the national situation in the area of human trafficking. This involves attempting to assess the extent of persons identified as potential victims of trafficking in Norway, hereunder providing profiles of victims (segregated by sex and age, forms of trafficking). It also provides an overview of judgements whereby the profiles of victims and convicted traffickers also appear. KOM also facilitates various seminars/meetings whereby different aspects of human trafficking challenges are being discussed. (e.g. KOM’s national seminar has had a special session for police and prosecutors enabling discussing issues specifically related to police efforts in preventing and investigating trafficking cases) The meeting points (also bilateral meetings between KOM and police) is relevant to uncover modus and trends in TIP matters.”

5.4.3 The Tax Authorities

Use of our own registers as the Civil Registration System, and the system where it is registered who runs the different enterprises, information from the Tax Return Form (information on income, tax deductions and assets), information that comes up during our tax controls where we look at accounting etc.²⁰

5.4.4 The Directorate of Immigration

“We report annually on statistics (identified trafficking cases in the asylum procedure, at reception centers and applications for a reflection period or a temporary residence permit and victims returned with assistance from IOM), trends and challenges. Norway does not have an independent National Rapporteur. A national coordinator on anti-trafficking issues works in the Ministry of Justice and Public Security. In 2006, the Government established a “Coordinating Unit for Victims of Trafficking.” This unit has a responsibility for improving the cooperation between civil society organizations and relevant authorities. The unit also issues an annual report on current trends, on statistics as well as describing challenges facing anti-trafficking efforts. UDI contribute to this report by our annually reports on statistics, trends and challenges. With regard to the last two types of residence permits available specifically for victims of trafficking in human beings: (1. Reflection period; 2. Limited residence permit; 3. Residence permit for witnesses in cases concerning human trafficking), we need a statement from the police (a report). We therefore exchange information with the police from case to case. In addition to this, we have the possibility to report on general trends or possible misuse to the Ministry, or we can report to cooperative networks/working groups when such are initiated, either related to the asylum procedure or to our mandate to process applications for resident and work permits. We do not have though a systematized routine to analyze and provide information to the police in order to uncover modus and trends within trafficking in human beings, for example related to applications for residence and work permits. This is often handled from case to case.”

²⁰ Translated from Norwegian.

5.5 Sweden

5.5.1 *The Migration Agency*

“...We identify most of suspected victims of human trafficking among the applicants for asylum, a small number among the persons applying for a work permit. As well as a few in matters of family ties. In 2014, when it received 111 internal reports of suspected human trafficking, 16 were underage. So far in this year the number of internal reports about suspected trafficking has increased significantly. 188 reports have been received until November and 62 of these were minors. These reports are compiled and sent to the Swedish Police Department of National Operations, so that they might use the data for strategic analyst. We are also trying to involve Swedish embassy abroad. Through education and information so that they can see indications of human trafficking when people apply for a visa or a residence permit via a Swedish embassy / consulate...”

5.5.2 *The Tax Agency*

“Civil registration, addresses & income tax, earlier decisions about income taxes regarding persons and vat registration, reported Vat, registration about employer and reported employer contribution.”

6. Exchange of Information

The two previous sections have shown which information the participating PAs estimate as being important in relation to THB. This section will – based on the findings from both the interviews and the questionnaires – look into whether this information in general is exchanged between the participating PAs, to whom it is exchanged and whether an inter-Nordic exchange between PAs is necessary.

The purpose is to create an opportunity for the participating PAs to share knowledge on how the exchange could be facilitated. Furthermore, the purpose is to shed some light on one of the main aims of the project, namely how potential THB information is exchanged across the Nordic borders.

The more specific exchange of information with the police will be dealt with separately in the next section.

6.1 Iceland

6.1.1 *The Directorate of Labour*

According to the representatives from the Directorate of Labour, the Directorate exchanges information with other PAs during workplace inspections.

The Directorate of Labour participates in a number of working groups concerning THB. The representatives highlight a “Small Group”, which is an informal working group where the participating PAs meet once a month and discuss trends and current cases within THB.

The Directorate of Labour, the police, the Tax Administration and the Administration of Occupational Safety and Health participate in inspections. During these inspections, the participating PAs exchange information and the Directorate has full legal mandate to exchange any type of information with other PAs.

The participants in the Small Group are the Directorate of Labour, the police, the Directorate of Immigration and the Tax Administration. The contact persons are always the same eight people, which according

to the representatives creates a good atmosphere for discussing any suspicion of THB.

The Directorate of Labour also participates in the Steering Group (for the Action Plan), and according to the representatives the contact persons in the Steering Group are those who the Directorate of Labour would contact in relation to THB cases. According to the representatives, the Directorate of Labour has contact persons in all relevant authorities.

The Directorate of Labour has no written procedures for the exchange of information to other PAs. If the Directorate of Labour has a suspicion of THB, they first investigate the case themselves, then in co-operation with the Directorate of Immigration or the police.

Nordic Exchange

The Directorate of Labour has never had the need to contact other Nordic PAs concerning THB. According to the representatives, they would contact the Icelandic police, should such a need arise.

6.1.2 The Directorate of Immigration

According to the representative from the Directorate of Immigration, the Directorate has exchanged information with the Directorate of Labour and the Ministry of Welfare – but mainly with the police.

The Directorate of Immigration contacts the Ministry of Welfare in relation to the provision of care to victims of THB.²¹ At the Directorate of Labour, the Directorate of Immigration has a permanent contact person. According to the representative from the Directorate of Immigration, the Directorate has a list of contact persons in all relevant PAs. The contact persons on the list are the same as those in the Steering Group.

The representative stresses that the victims always know that the Directorate contacts the Ministry and vice versa and therefore information can be exchanged either via e-mail or by phone. The Steering Group is also considered a sort of platform for the sharing of contact information. The need for exchanging THB-related information is, however, quite limited.

²¹ According to the representative, a new team of specialists in charge of service needed for THB victims is formed by the Ministry of Welfare. In future, the Directorate will contact that team in case of a new case.

Nordic Exchange

The Directorate of Immigration has never had the need to contact other Nordic PAs concerning THB. According to the representative, the Directorate would contact the Icelandic police, should such a need arise.

6.1.3 The Reykjavik Metropolitan Police

According to the representative from the Reykjavik Metropolitan Police, the police have been lecturing all other relevant PAs on indicators of THB and on which information could be relevant for the police.

The Reykjavik Metropolitan Police has regular meetings with the Directorate of Immigration about THB, which makes the exchange of information run quite smoothly either by phone or e-mail. According to the representative, the Reykjavik Metropolitan Police is also exchanging information with the Ministry of Welfare regarding care and social services for the victims.

According to the representative, a task force focusing on workplace inspections has just been established with the participation of the Labour Unions, the Tax Administration and the Administration for Occupational Safety and Health.

As part of the lectures on THB, the Reykjavik Metropolitan Police has established a communication network with a contact person from each PA. The purpose of the network is to make sure that each authority has one “key person”, responsible for sharing THB information. The appointment of key persons has resulted in more information being shared with the police.

The contacts made in the Steering Group are the ones used also for the informal exchange of information. The contact to the Directorate of Immigration was created in the Steering Group.

The participants in the task force share information and based on that they decide where to conduct inspections. According to the representative, the informal exchange of information is quite easy, whereas the formal exchange during an investigation is more complicated.

Nordic Exchange

The Reykjavik Metropolitan Police has never had a need to contact other Nordic PAs concerning THB. Should such a need arise, the Reykjavik Metropolitan Police would contact the equivalent Icelandic authority and ask them to establish the contact.

6.1.4 *The Ministry of Welfare*

According to the representative from the Ministry of Welfare, the Ministry is participating in two teams connected to the Action Plan, a large team and a small team. Both teams focus on how to assist victims.

The large team is ensuring coordination and cooperation and exchange information between different actors. According to the representative, the small team exchanges information on individual cases, focusing on how to assure that victims of THB have appropriate welfare services. The team meets every second month and ad hoc, if necessary. Relevant PAs have key persons in relevant teams.

Nordic Exchange

The Ministry of Welfare has only seldom had the need to contact other Nordic authorities concerning a specific case of THB.

6.2 Finland

6.2.1 *The National Bureau of Investigation*

The representative from the National Bureau of Investigation explains that the police have the legal mandate to receive any information from whichever PA. The representative explains that the National Bureau of Investigation receives a lot of information concerning THB, which gives the impression that other PAs focus on THB and know how to contact the police.

Investigations have been initiated based on information received from the labour inspectors and the police might ask other PAs for information during an investigation.

The representative explains that a multi-official working group concerning illegal immigration meets once a month and discusses strategy, including THB. Information on single cases may be shared by the participants between the meetings.

The representative explains that the police have a contact person from the working group, e.g. in the Ministry of Foreign Affairs, who informs the police and other participants about relevant data from the embassies. This information has also been used for initiating investigations both by the National Bureau of Investigation and by the police districts.

When there is a need for sharing information with other PAs, the police contact a working group member they know already. If that person is not available, the police have access to relevant databases of the Min-

istry of Foreign Affairs, and the Immigration Service would, therefore, just contact the specific caseworker responsible for that specific case. The representative explains that the police do not need to exchange case information with the Ministry of Foreign Affairs and the Immigration Service, as they can enter their databases and find the information themselves. The representative explains that the police work closely with the Immigration Service and the Ministry of Foreign Affairs and estimates that the police could be better at sharing information with other PAs too.

Employees from the Tax Administration work within the National Bureau of Investigation and serve as a sort of contact point.

Nordic Exchange

Concerning exchange of information to other Nordic authorities the National Bureau of Investigation could facilitate this via the other Nordic police authorities.

6.2.2 The Ministry of Employment and the Economy

The representative from the Ministry of Employment and the Economy explains that the “UMA database” contains relevant information on third country nationals.

If the TE Offices handle a suspicious case,²² they contact the Occupational Safety and Health or the Immigration Service. These two authorities would then contact the police, if necessary.

The TE Offices are currently developing a database for sharing information with the Tax Administration.

The need for exchanging information to other PAs is due to the existence of the UMA database quite limited as the TE Offices would just ask e.g. the Immigration Service or the Occupational Safety and Health to check the information on this or that person in the database.

Nordic Exchange

The TE Offices have never had the need to contact other Nordic authorities. According to the representative, it is not really possible for them to get a suspicion about something that might be relevant for other Nordic authorities concerning THB, as business activities in other Nordic countries are not asked for in the form filled out by the employer.

²² The TE Offices give partial decisions on work permits.

6.2.3 *The Immigration Service*

If the Immigration Service has a suspicion about THB in relation to work permit applications, they would contact the Labour Protection (Occupational Safety and Health), who would then do a workplace inspection. The Labour Protection would then contact the police, if necessary.

If the Immigration Service has a suspicion about THB concerning a residence permit application submitted in a Finnish embassy, they will ask the relevant embassy to conduct an interview with the applicant. Consequently, the application can be rejected. This makes it difficult to contact the police with THB information as the rejection of the application hinders the crime.

The representative from the Immigration Service explains that the Service has a main e-mail address for all cases or information related to THB.

Nordic Exchange

The representative explains that there has never been a need for sharing information with other Nordic authorities concerning THB. If the need arose, the Immigration Service would contact the Finnish police and ask them to establish the contact through the other Nordic police authorities. Information concerning asylum seekers and potential THB victims is easily exchanged with other countries via the Dublin Procedure.²³

6.2.4 *The Occupational Safety and Health*

The representative from the Occupational Safety and Health explains that the Immigration Service and the TE Offices contact them if they have a suspicion about THB.

The representative explains that the TE Offices and the Occupational Safety and Health are in regular contact via e-mail concerning salaries and work hours that are not compliant with the collective agreement. The representative, however, does not recall any cases from the TE Offices concerning THB. The representative explains that exchange of information between the immigration officials is quite easy in Helsinki, but that the exchange of information with the police concerning possible criminal cases is quite challenging. The Occupational Safety and Health has access to some of the information in the UMA database, but it is not

²³ The Dublin Procedure refers to the EU Dublin Regulation that contributes to determining which EU member state is responsible for processing an asylum application from a refugee seeking protection according to the 1951 Geneva Convention.

possible to write messages in the system. The representative explains that this means that the TE Offices can direct the attention of the Occupational Safety and Health to a specific client in the database, but that the suspicion is sent by e-mail.

Nordic Exchange

There has never been a need for contacting other Nordic authorities concerning THB, but if that need arose, the representative would contact the Finnish police and the Finnish Immigration Service.

6.2.5 *The Ministry of Foreign Affairs*

The representatives from the Ministry of Foreign Affairs explain that they very seldom receive information from the Finnish central authorities in the individual cases.

The representatives explain that they meet regularly with representatives from the police, the Border Guard, the Security Police, the Customs and the Immigration Service and exchange information on trends and that the minutes from these meetings are forwarded to the relevant Finnish embassies abroad. The meetings are about irregular immigration, including THB.

The representatives explain that at the Finnish embassies they have a good cooperation with the Border Guard. Any information concerning THB would be forwarded to them and they would inform other Finnish authorities, if necessary.

Due to the national registry system where all information concerning applications from third country nationals is registered (UMA), there is very seldom a need to exchange information as information is exchanged automatically between the Immigration Service, the embassies and the police.

Nordic Exchange

The embassies often need to contact other Nordic authorities concerning THB information in countries where they represent other Nordic countries. The only way of doing this is by asking the Border Guard to forward the information to the police authority in the relevant country. The embassies exchange information with other Schengen embassies concerning trends and cases.

6.3 Denmark

6.3.1 *The Working Environment Authority*

According to the representative from the Working Environment Authority, they have a need – albeit a rare need – for contacting the police, but no other PA.

Nordic Exchange

The authority has never had the need to contact any other Nordic authorities concerning THB. If the need arose, the Working Environment Authority would send an e-mail to the main inbox.

6.3.2 *The Danish Centre against Human Trafficking*

According to the five representatives, the contact to other authorities is formally facilitated through several “Referral Groups”, six regional and one national. The groups include representatives from authorities, such as the police (national and local), Immigrations Service, Ministry for Children, Education and Gender Equality and the National Public Prosecutor Unit and Tax Authorities.²⁴ Furthermore, a specific governmental interdisciplinary group against forced labour is also focusing on the coordination of the work against THB.

The Danish Centre against Human Trafficking exchanges THB information with authorities like the Tax Administration and the Immigration Service. According to the representatives, there exist a number of different local and national coordination groups nationwide with the participation of the Danish Centre against Human Trafficking, the Immigration Service and various police units.

According to the representatives, the groups do not discuss ongoing cases in detail, but create an opportunity for the participants to discuss cooperation, procedures, challenges, trends and the sharing of knowledge on THB.

Nordic Exchange

The centre has never had the need to contact other Nordic authorities concerning THB, but has different forums for cooperation with Nordic partners where information is exchanged on experiences, but not on ongoing cases.

²⁴ NGOs such as the Unions, Red Cross, social projects working with THB etc. also participate in these groups.

6.3.3 *The National Centre of Investigation*

The police have previously conducted investigations where other PAs have participated directly in the investigation. According to the representative, the police are allowed to exchange information as soon as an investigation is ongoing.

According to the representative from the National Centre of Investigation, information is often exchanged with the Ministry of Foreign Affairs, Immigration Service, Tax Administration and the Danish Centre against Human Trafficking.

Two employees from the Tax Administration are permanently assigned to the National Centre of Investigation and contribute to investigations involving organized crime, including THB.

The representative highlights that reports received from the Tax Administration and the Immigration Service have initiated investigations.

The representative explains that there are a number of informal co-operation forums on THB where ongoing cases are discussed between the participants. The contact details exchanged during meetings in the formal forums are used for exchanging information on ongoing cases.

Nordic Exchange

The National Centre of Investigation has never had the need to contact other Nordic PAs concerning THB,²⁵ but if that need should arise, the National Centre of Investigation would contact the authorities through the national police of that country. The National Centre of Investigation is not entitled to exchange information to other Nordic authorities, unless the perpetrator is convicted for a felony. The National Centre of Investigation would be able to facilitate contact between a Danish authority and another Nordic authority through the agreement on inter-Nordic police cooperation.

6.3.4 *The State Administration*

According to the representatives from the State Administration, they have experienced a need for contacting the Immigration Service and the Tax Administration concerning THB.

The information is exchanged through e-mail.

²⁵ Other Nordic police authorities exempt, see section 7.

Nordic Exchange

The State Administration has never had the need to contact other Nordic authorities concerning THB, and if they had, the Immigration Service would facilitate it.

6.3.5 *The Agency for International Recruitment and Integration*

According to the representative from the Agency for International Recruitment and Integration, it is often necessary to exchange information with other PAs concerning THB.

The Agency for International Recruitment and Integration, the police, the Working Environment Authority, the Tax Administration and the municipalities are conducting workplace inspections together, but they are not mandated to exchange information during the inspections.

If the Agency for International Recruitment and Integration has a suspicion about THB, they are not able to exchange information with other PAs, but will have to contact the police who would then collect information from other relevant authorities.

Nordic Exchange

The Agency for International Recruitment and Integration has never had the need to contact other Nordic authorities concerning THB, but in case they had to they would contact the Danish police.

6.3.6 *The Tax Administration*

The two representatives from the Tax Administration explain that they exchange information with the police and the Danish Centre against Human Trafficking.

The representatives explain that the Tax Administration tries to assure continuity in the exchange of information by appointing specific contact persons.

Nordic Exchange

The Tax Administration has never had the need to exchange THB-related information to other Nordic authorities, but is cooperating with other Nordic tax administrations and could, in theory, also exchange information on THB through those cooperation agreements. If it would be necessary to implicate other Nordic authorities, the case would presumably already be investigated by the police, and the representatives therefore estimate that the police would facilitate the contact.

6.3.7 *The Visa Office/Immigration Service*

The representative from the Visa Office/Immigration Service explains that the Visa Office exchanges information with the Danish Centre against Human Trafficking and the embassies.

The contact with the embassies is regarding processing of visa applications and is facilitated through a specific database.

Nordic Exchange

The Visa Office has previously contacted the Immigration Service in Norway. This was done over the phone. The Visa Office would contact other Nordic authorities themselves, if needed.

6.3.8 *The Citizen Service, Visa and Passport /Ministry of Foreign Affairs*

The representative from the Citizen Service, Visa and Passport/Ministry of Foreign Affairs explains that since May 2015 the embassies are mandated to reject visa applications. Therefore, the embassies no longer contact the Immigration Service regarding applications that are rejected based on THB suspicions. If the embassies are not rejecting an application, but have a suspicion about THB, it is still legal for them to inform the Immigration Service about that suspicion.

If the embassies choose to involve the Immigration Service in a possible rejection of an application, they would hand over the case to the Immigration Service completely. Then the Immigration Service – and not the embassies – would potentially file a report based on a suspicion about THB to the police.

Nordic Exchange

In countries where more Nordic embassies are present, the embassies share information locally on trends and misuse of the visa system. The Danish embassies are in some countries mandated to reject visa applications on behalf of other Nordic countries. When the rejection is based on a suspicion about THB, the other Nordic Ministries of Foreign Affairs or Immigration Services are not informed.

6.4 Norway

6.4.1 *The Labour Inspection Authority*

The representative explains that a cooperation with other PAs to combat social dumping started some years ago and that during the last couple of years the cooperation between PAs have been significantly strengthened and institutionalized.²⁶ According to the representative, an important step in this cooperation is the opening of regional offices with employees from the Labour Inspection Authority, the Tax Authorities and the police. In these offices, information is shared and inspections and control activities are planned and carried out in cooperation. The main purpose is to stop economic crime and social dumping, but it is expected that the increased cooperation will create better possibilities for addressing situations with THB in the future.

Today a great number of the Labour Inspection Authority's inspections are carried out in cooperation with the tax authorities and the police with a focus on social dumping. According to the representative, there is a continuing process for better exchange of relevant information and intelligence between these authorities.

The representative explains that when the entities meet in the KOM network they discuss tendencies and not specific cases.²⁷ The labour inspectors cannot decide if a situation is THB or a person is a victim. The inspectors can point out a workplace and express concern about working conditions, but they will always leave the investigation to the police and the care of the victims to an NGO.

Nordic Exchange

According to the representative, the Labour Inspection Authority has never had the need to contact other Nordic authorities concerning THB. If information from other countries concerning THB would be necessary, it would be exchanged through the Norwegian police.

²⁶ Social dumping: The use of labour considered relatively cheap compared with the normal rates of the concerned labour market.

²⁷ "KOM network" is a network for all Norwegian entities working against human trafficking under the umbrella of the Coordinating Unit for Victims of Trafficking (KOM), which will be referred to many times in the following as the "KOM network".

6.4.2 *The Coordinating Unit for Victims of Trafficking (KOM)*

The representative from the Coordinating Unit for Victims of Trafficking (KOM) explains that the unit is coordinating between the non-governmental organizations and the PAs.

KOM is responsible for an annual status report describing THB in Norway and the challenges met by those working against THB. KOM is responsible for capacity building and knowledge sharing on THB and arranges national seminars and other forums on THB and the indicators of THB. According to the representative, the members of KOM are the points of contact for their organization/authority. KOM registers their contact details and if someone is in doubt as to who to contact concerning THB in other PAs, they could contact KOM who would then facilitate the contact. According to the representative, KOM often functions as a link also between PAs when they wish to contact each other. The PAs provide general information on trends for the annual report via e-mail. There is a huge demand for information about THB.

6.4.3 *The Tax Authority*

The representative from the Tax Authority explains that they sometimes contact the Labour Inspection Authority. According to the representative, the Tax Authority carries out more and more controls in cooperation with the Labour Inspection Authority, the Norwegian Labour and Welfare Administration and the police.

Exchange of information to other PAs concerning THB would always go through the police.

Nordic Exchange

According to the representative, the tax authorities have never had the need to contact other Nordic authorities concerning THB. If needed, the exchange of information to other Nordic authorities would always go via the Tax Directorate or through the police.

6.4.4 The Directorate of Immigration

The representative from the Directorate of Immigration explains that the THB coordinators of the Directorate are represented in the KOM network and therefore know who works with THB in the other PAs.²⁸

The Directorate exchanges aggregated data and information on trends with KOM for the annual report, but never on individual cases. The representative explains that it is more often the labour inspectors or the police who discover cases on labour exploitation and then inform the Directorate, if necessary.

The representative explains that there is no established group on a national level between the immigration authorities and other PAs who meet regularly for discussing THB concerning labour exploitation. The Coordinating Unit for Victims of Trafficking is the only national referral coordinating mechanism, which means in practice that only limited resources are dedicated for a cooperative strategic action against THB.

Nordic Exchange

The representative had no information about cooperative contact between Nordic immigration authorities concerning THB on labour exploitation. They have a cooperation network with other Nordic immigration authorities, but not particularly concerning THB.

6.4.5 The National Criminal Investigation Service

According to the representative, only few investigations have been initiated based on information received from other PAs.

One of the first cases in Norway on forced labour was based on information given from the Directorate of Immigration to the National Criminal Investigation Service during a KOM network meeting. According to the representative, more and more both regional and national meetings are arranged in order to fight labour market crime.

Other PAs as the Directorate of Immigration, the Labour Inspection Authority, the Norwegian Labour and Welfare Administration and the tax authorities are often invited onboard after the pre-investigations in order to contribute with information.

²⁸ All the cases referred to by the representative from the Norwegian Directorate of Immigration in this report are concerning labour exploitation, emphasizing that the answers would be different concerning exploitation for prostitution.

In the larger THB cases the Norwegian Labour and Welfare Administration and the tax authorities have been the main contributors.

According to the representative from the National Criminal Investigation Service, there is an informal exchange of information between the PAs during the meetings in the KOM network. The representative further explains that the exchange of information with other PAs is based on bilateral channels.

In the larger cases employees from the tax authorities have been appointed full-time to the investigations with access to both police and tax registers.

Nordic Exchange

According to the representative, the police seldom contact other Nordic authorities concerning THB. It is, however, estimated that the districts often contact other Nordic police authorities informally, especially in the border areas. Even just exchanging information with other Nordic police authorities regarding THB seldom happens. However, it is estimated that it is relevant to contact other Nordic authorities in connection to THB, and in these cases the SIENA system, e-mail and phone is used.

6.5 Sweden

6.5.1 The Migration Agency

According to the representative from the Migration Agency, THB is relevant in all areas, but it is mostly seen by the caseworkers in the asylum department. The representative estimates that it is more likely that the Working Environment Authority detects THB in relation to forced labour than the Migration Agency. The representative explains that there is a common understanding that if a caseworker has a suspicion about THB, it is okay to investigate the case and also to contact other PAs, if necessary. According to the representative, the Agency often has the need for exchanging information on individual cases, but this exchange is hindered by the law of secrecy in some cases.

According to the representative, the embassies contact the Migration Agency if they have a case that might be THB, but this only happens seldom. The Central Anti-Human Trafficking Coordinator from the Migration Agency is training the embassy employees in indicators of THB.

According to the representative, groups of PAs are meeting regularly in relation to THB. According to the representative, there is a formal meeting forum on the regional level where information is exchanged.

Nordic Exchange

According to the representative, the agency has never had the need for exchanging information concerning THB with other Nordic authorities. If they had the need, they would contact them through the Central Anti-Human Trafficking Coordinator of the Agency or the international department.

6.5.2 The Department of National Operations (Police)

The representative explains that the Migration Agency provides the police with aggregated data on the number of victims and on individual cases. The representative explains that they have meetings with the Migration Agency before the berry-picking season starts in order to prevent exploitation of the foreigners applying for work permits for the berry-pickling industry. According to the representative, the police have never received information from the Working Environment Authority, but they would very much like to start a cooperation with them. Furthermore, the representative mentions an upcoming multi-official group against forced labour which according to Swedish jurisdiction falls under THB.

The information on individual cases from the Migration Agency is, according to the representative, without individual information. If the police want to know more about a case, they will just ask for it. According to the representative, the National Police is participating in the National Method Support Team together with representatives from the regional police, the international prosecutor and the social services from the bigger city areas. The team is led by the national coordinator and meets five times a year. The meetings in the team are mainly for strategic discussions, but information is also exchanged on individual cases during the meetings. Furthermore, a number of regional and one national intelligence centres are established. During meetings in these centres information is also exchanged about individual cases. The centres, however, do not have an explicit focus on THB, but contact points are established for exchange of information. According to the representative, a liaison officer from the Tax Agency works with the National Police and is used as a contact point for exchange of information with the Tax Agency.

Nordic Exchange

If other Nordic police authorities requested information from other Swedish authorities, the National Police would be able to facilitate that exchange of information. The representative has never had the need to contact other Nordic authorities concerning THB, but, if necessary, they would be contacted through the international police cooperation.

6.5.3 The Tax Agency

According to the representative from the Tax Agency, the agency mainly conducts inspections alone, but would like to carry out inspections together with the Working Environment Authority.

According to the representative, the Tax Agency has prepared an information sheet for foreign workers that has been distributed to relevant embassies in Sweden for them to distribute the information sheet to potential work permit applicants. The intention is to inform the workers about the Swedish working conditions before they arrive so that they do not sign contracts with lower salaries and longer working hours than usually accepted by the Swedish labour market. This information sheet is also distributed to the department within the police in charge of traffic control in order to be distributed to drivers from relevant countries.

According to the representative, it is not easy to exchange information between the PAs. This is, however, necessary in order to gather enough evidence to see potential THB cases and actually to have something to report to the police.

Nordic Exchange

The representative explains that the Tax Agency has never had the need to exchange information to other Nordic authorities concerning THB, but if that need should arise, the Agency would contact them directly.

7. From Public Authorities to the Police

This section uncovers how the participating PAs exchange potentially THB-related information to the police and how the PAs contact the police.

The intention is to clarify the flow of potentially THB-related information and create a possibility for the participating authorities to share knowledge within a relatively uninvestigated field. The flow of information to the police is essential in THB cases as the police have the legal mandate to investigate and thereby uncover perpetrators of THB. The flow of information to the police could be decisive for successful investigations and knowledge of this flow could help enhance the flow.

In a Nordic context, the police authorities have the legal mandate to contact each other concerning THB and nationally to contact other PAs and involve them in investigations. The police authorities as such become the common denominator in the exchange of THB-related information, as all PAs have the legal mandate to exchange crime-related information to the police. The police have the legal mandate to include other relevant PAs in investigations, if needed, and to exchange information across borders to other police authorities who then have the legal mandate to include other relevant national PAs.

7.1 Iceland

7.1.1 The Directorate of Labour

According to the representatives from the Directorate of Labour, the exchange of information to the police is carried out quite easily, as the contact person for THB has been the same for the last three years.

The representatives highlight the fact that the Directorate of Labour can contact the police not only when filing reports, but also in cases concerning suspicions. When a caseworker has a suspicion, the legal team of the Directorate is contacted, who is then in charge of contacting the police. The police are phoned and a meeting is arranged, during which the specific suspicion is discussed.

7.1.2 *The Directorate of Immigration*

According to the representative from the Directorate of Immigration, the exchange of information with the police happens quite often.

The Directorate of Immigration either contacts the police in Suðurnes (international airport district) or Reykjavik (capital district). A specific employee within the Directorate of Immigration is in charge of the contact to the police, and other employees contact this specific person if they have a THB suspicion.

There is no written procedure on how to contact the police. The Directorate of Immigration always looks further into a suspicion before contacting the police. If the Directorate of Immigration wants to file a report or exchange information to the police, the contact person from the Directorate of Immigration sometimes calls the contact point at the police beforehand in order to inform about the upcoming report. The report is sent through a secure e-mail system. Sometimes a meeting is arranged where the Directorate of Immigration delivers the relevant information to the police.

7.1.3 *The Ministry of Welfare*

According to the representative from the Ministry of Welfare, the local social services are exchanging information with the police on trends and ongoing cases. The main purpose of the sharing of information is to coordinate social services and protection provided for the victims.

7.1.4 *The Reykjavik Metropolitan Police*

The THB department has initiated the communication network of PAs to assure that all PAs know which information is relevant in connection to THB and how they can share this information with the police.

According to the representative from the Reykjavik Metropolitan Police, other PAs can either contact the head prosecutor, any local police department or the THB department from the capital district with a report. The THB department would always be internally contacted and would assist the local police during an investigation. The PAs have been tasked to point out a key person in charge of sharing THB information with the police. The Reykjavik Metropolitan Police has pointed out an equivalent key person to receive the information. According to the representative, the network is established in order to assure that *any* relevant information is shared with the police because what might seem in-

significant for a PA, could turn out to be the missing piece of a big puzzle for the police.

The network is planned to meet regularly and discuss ongoing cases and trends. Furthermore, the police receive information from other PAs during meetings in the Steering Group where both former and ongoing cases are discussed. The Reykjavik Metropolitan Police invites PAs to call and arrange a meeting, even if they only have a suspicion. During the meeting it will be discussed whether to file a report or not.

Nordic Exchange

At a Nordic level, information between police authorities is exchanged quite smoothly due to the SIENA information system and the liaison officer of the Icelandic police in Europol. The representative emphasizes that Europol and Interpol are efficient channels for sharing information on a case level, but not regarding trends. The representative stresses that bilateral contact between police officers is quite essential for THB cases. The representative also emphasizes international THB conferences and the Focal Point (Europol working group) as forums for creating potential bilateral contacts on THB cases. According to the representative, there is no specific THB cooperation between the Nordic countries on a case level.

7.2 Finland

7.2.1 The Ministry of Employment and the Economy

The representative from the Ministry of Employment and the Economy explains that the ELY Centres could,²⁹ in theory, process potentially THB-related information, but have never had the need for contacting the police concerning THB, as far as the representative is informed. The TE Offices do not recall having ever contacted the police concerning a THB suspicion. The police, however, sometimes contact the TE Offices concerning information on work permits and employers that is not entered into the UMA system.

If suspicious cases appear, the TE Offices contact the Labour Protection and the Immigration Service. The TE Offices have information about the employers on paper in archives, information that is not in the UMA

²⁹ The ELY Centres process cases about bankruptcy.

system. The TE Offices should contact the National Police Board if they have relevant THB information.

The information is sent to the police as attachments to e-mails. The TE Offices have no procedures for how the police should contact them. The procedure is to give the information to the police, when they ask for it.

7.2.2 The Immigration Service

The representative from the Immigration Service explains that the Immigration Unit has an illegal immigration specialist who meets with the police regularly concerning illegal immigration. This might overlap with THB and therefore the illegal immigration specialist shares the minutes from the meetings with the THB specialist.

The Immigration Service contacts the National Bureau of Investigation if they register some new trends or something that might be national. The National Bureau of Investigation has a main e-mail address for THB-related information that facilitates communication.

The Immigration Service has written guidelines for what to do with a potential THB victim, what information to be alert to and how to contact the police concerning THB. If the Immigration Service has THB information relevant for the police, they contact the police by e-mail or call the police and arrange a meeting. The police and Immigration Service share the same database (UMA) with information concerning the applicants. Therefore, the police just have to know what to look for and then they can access the information themselves. The Immigration Service might process THB information during an asylum interview. Also the caseworkers processing residence permits often get suspicious about THB.

7.2.3 The Occupational Safety and Health

The representative from the Occupational Safety and Health explains that they have a guidebook stating that if an inspector detects THB-related information, it should be given to the police. It is, however, not mentioned *how* the information should be given and to *whom*.

The representative explains that it is quite difficult to find out *who* to contact within the police, as the organizational structure of the police differs from district to district and the police units are often reorganized. The representative explains that the Guidebook states that the inspectors should just “tell” the police if they come across THB, which the representative finds odd since THB is a serious crime. In the Finnish Criminal Code THB is not listed as a crime that the Occupational Safety and

Health Authorities should report about to the police. Therefore, in stead of filing a report on THB, they have to file a report on extortionate work discrimination and then add a sentence stating that it could be THB. If a report is filed to the police, the Occupational Safety and Health prints out information from the UMA system for the police.

7.2.4 *The Ministry of Foreign Affairs*

The representatives explain that some embassies have lots of suspected THB cases.

The Border Guard trains all consuls about fraudulent documentation, THB and illegal immigration before they go abroad. The representatives from the Ministry of Foreign Affairs explain that in some embassies a Border Guard is stationed permanently. The Border Guard trains the personnel at the embassy, screens applications and investigates suspicious cases. Some cases would be referred to the Border Guard, as other victims of the same THB network would usually already be in Finland. The representatives explain that THB information is most often referred to the Border Guard and not the national police. One of the representatives highlights that often when the National Police is contacted they do not give a reply, so it is difficult to know if the information has been received, reacted to or if it was irrelevant. The National Police seems far away from the embassies and there is already a cooperation with the Border Guard.

Often the Border Guard would already be following the cases. The Border Guard has access to the police register, the UMA system and the visa system. The embassies do not *exchange* information concerning individuals as this information is already in the system; they merely point the attention of the police or the Border Guard towards something specific.

7.2.5 *The National Bureau of Investigation*

The representative from the National Bureau of Investigation explains that when something criminal happens in Finland, the police are in charge of the investigation and when criminal activities are related to border crossings – e.g. THB, human smuggling or illegal immigration – the Border Guard can be in charge of the investigation. The police and the Border Guard sometimes make joint investigation teams. The representative explains that it might be difficult for the Border Guard to detect THB, as they only see people when they cross the border.

The other PAs can contact whichever police office in the country with THB information. Investigations should, however, be initiated by the local police. Normally, the local immigration authorities and the local police cooperate. Each of the eleven police districts have investigation units focusing on immigration and knowing about THB.

The police often receive phone calls and e-mails from other PAs asking what to do with potential THB information. PAs could just send an e-mail to the general inbox of the National Bureau of Investigation.

Nordic Exchange

Concerning exchange of information to other Nordic police authorities, the representative explains that the police send and receive inquiries on THB through the SIENA system. The representative further explains that the National Bureau of Investigation keeps the police districts up-to-date on investigations abroad and screens reports for links to other investigations in other countries or other police districts in Finland. In addition, the THB unit in the National Bureau of Investigation is in contact with similar offices in the other Nordic countries, and through this network they inform each other either by e-mail or a SIENA inquiry. The representative estimates that it would be possible to share information on new trends received at EU meetings between PAs in Finland.

7.3 Denmark

7.3.1 The Working Environment Authority

The representative from the Working Environment Authority explains that the Authority has a “quality procedure” regulating the exchange of information to other PAs.

The procedure assures that contact to the police is not based on personal networking and therefore will proceed even after internal organizational restructuring. The Working Environment Authority cooperates with the police on a regular basis during inspections and therefore always knows which district to contact. The police participate in inspections where there is a suspicion about possible THB beforehand.

Relevant information is sent through a database when a pre-made form is filled out. The pre-made form concerning THB automatically generates an e-mail to a police district chosen by the labour inspector and his supervisor.

7.3.2 *The Danish Centre against Human Trafficking*

The representatives highlight that the overall institutionalized framework assures the cooperation and it is, therefore, possible to share information based on personal contacts and networks.

According to the representatives from the Danish Centre against Human Trafficking, there are no specific official procedures for contacting the police. The representatives explain that they consider the National Centre of Investigation to be the official contact point, when in doubt. The contact between the centre and the police is often based on local cooperation between the local centre employees and the local police – often to a specific contact person. Information about local trends is shared with the local police, whereas larger cases are shared with the Copenhagen-based THB department or the National Centre of Investigation, with whom also knowledge about national trends and challenges is shared.

The general picture is that the Danish Centre against Human Trafficking contacts police officers they know beforehand and ask him/her who to call next, if needed. The Danish Centre against Human Trafficking, the Police and the Tax Administration have established a task force, where the centre is providing information in regard to specific investigations. The task force meets three times a year and covers two regional areas of Denmark. A similar task force is under development in the capital area.

7.3.3 *The State Administration*

The representatives from the State Administration explain that few reports are sent to the police and that no procedure, therefore, exists.

If a caseworker has a suspicion about THB, the director contacts the police. The State Administration has each time contacted the National Centre of Investigation.

The initial contact is by phone in order to find out who to contact and then the information is sent by e-mail.

7.3.4 *The Agency for International Recruitment and Integration*

The representative from the Agency for International Recruitment and Integration explains that they seldom contact the police concerning THB and therefore no procedure exists.

The Agency for International Recruitment and Integration contacts the Police/National Aliens Centre if the suspicion concerns foreigners or

several police districts. In other cases the local district is contacted. It has been challenging for the Agency for International Recruitment and Integration to file a report to the police where more districts have been involved due to what seems to be an internal lack of coordination in the police. The representative would prefer to have just one THB contact point in the police.

If a caseworker has a suspicion about THB, he/she contacts the Agency for International Recruitment and Integration control unit and then this unit sends an e-mail to the police. Exchange of information on trends is facilitated at meetings with the police.

7.3.5 *The Tax Administration*

The representatives from the Tax Administration explain that a procedure for how to contact the police concerning THB is being prepared.

Every employee in the THB group has specific districts that they are in charge of contacting. The contact is based on personal contacts and network from common THB operations between the police and the Tax Administration. The Tax Administration explains that the police often divide THB reports into smaller investigations for other crimes and that – if a report concerns several districts – there seems to be a lack of coordination internally in the police. The representatives experience a diversity in resources and knowledge about THB between the police districts making it difficult to file a report. The representatives would prefer to know explicitly who the THB-responsible officers are in each district. Sometimes the police contact the Tax Administration in order to get information from the Tax Administration system. This contact is based on personal contacts and network.

The representatives explain that information is sent to the police by e-mail to the police districts, but that they would always call beforehand.

7.3.6 *The Visa Office/Immigration Service*

The representative from the Visa Office/Immigration Service explains that there is no procedure for contacting the police. The everyday contact to the local police runs smoothly. The Visa Office, however, seldom files a report concerning a THB suspicion.

The Visa Office regularly exchanges information with the local police districts concerning their casework and vice versa. If they file a report concerning THB, they contact the National Centre of Investigation.

A report concerning THB would go through e-mail or snail mail. The police contact the Visa Office at the main e-mail address. The representative explains that once the Visa Office had wanted to file a report to the police, but the police never answered, despite several attempts to establish contact even to specific contact persons at the National Centre of Investigation. The representative highlights that information in reports filed to the police might expire if the reports are not handled promptly and would, therefore, prefer if it was possible to just file a report immediately.

7.3.7 *The Citizen Service, Visa and Passport/Ministry of Foreign Affairs*

The representative from the Citizen Service, Visa and Passport /Ministry of Foreign Affairs explains that as far as the representative is informed, it has never been necessary to contact the police concerning THB.

The embassies, however, provide information to the police when asked, e.g. in relation to departure controls.

The representative explains that due to the law on sensitive personal data, the legal experts would have to approve any report filed to the police. The representative estimates that it would not be difficult to contact the police, if needed. Once a year the embassies submit a risk report to various ministries with information about trends in misuse of visa. This report might contain information relevant to the police. Furthermore, the embassies could provide the police with information about trends in THB in their region, if requested.

7.3.8 *The National Centre of Investigation*

The representative from the police explains that the National Centre of Investigation receives many reports from other PAs.

When reports are received at the National Centre of Investigation/THB department, the THB department contacts the relevant police district that will be in charge of the investigation. Other PAs can contact either the main inbox of the police, the National Centre of Investigation specifically or any district with a THB suspicion. Every district has a minimum of one THB-responsible officer.

There is no specific procedure that other PAs have to follow if they want to contact the police.

Nordic Exchange

The representative explains that the National Centre of Investigation contacts other Nordic police authorities through Europol and Interpol. In larger cases, it is possible to establish a Joint Investigation Team (Europol) with a minimum of two countries participating. In NREM,³⁰ the participants are exchanging information on modus and trends.

7.4 Norway

7.4.1 The Labour Inspection Authority

According to the representative from the Labour Inspection Authority, the inspectors will contact the police if they get a THB suspicion during an inspection. According to the representative, there is no written procedures for how to contact the police in cases with suspicion of THB. The inspectors are only seldom suspicious about THB, but it happens. The representative explains that the labour inspectors often experience cases of social dumping. It is when they discover it in connection with physical or psychological force that they get suspicious about THB.

According to the representative, the contact from the local labour inspector would always be to the local police. There might be cases where there has been no previous contact between the labour inspector and the relevant THB department in the police. Therefore, it might not always be the right person that the THB information is directed to in the first place. The Labour Inspection Authority would expect the police to send the information to the right department themselves. Often when the police participate in an inspection, it is officers from the Immigration Department. The Labour Inspection is obligated to cooperate and give information about enterprises using illegal employees.

How the inspectors contact the police differs across Norway according to the indicators detected by the inspector, previous contact and cooperation between the local inspector and the police. The local offices have regular meetings and cooperation with the police. Written procedures exist for how to contact the police concerning breaches of the health and safety legislation, but not concerning forced labour covered in the general penal code. Contact is either by phone during or right after the inspection or by e-mail. In some cases the Labour Inspection has made a formal report to

³⁰ EU platform against human trafficking (National Rapporteurs or Equivalent Mechanisms) with the participation of police, public authorities, municipalities and NGOs.

the police, describing everything the inspectors have registered during the inspection and asking the police to initiate an investigation.

7.4.2 *The Coordinating Unit for Victims of Trafficking (KOM)*

According to the representative from the Coordinating Unit for Victims of Trafficking (KOM), the police have a national THB group in which KOM is participating. KOM has contributed to capacity building initiatives in the different police districts jointly with the National Police Directorate and the National Criminal Investigation Service.

KOM is often contacted by police officers asking for advice on cases and indicators. KOM often functions as a referral mechanism if a NGO or another PA wants to contact the police. According to the representative, not all police districts have a THB representative. The police also contact KOM if they need to refer a victim to the protection/care system or need to contact another PA.

The police use KOM as a knowledge centre. According to the representative, after training the districts, more police officers contact KOM concerning THB. The representative emphasizes that one of the most important actors to inform about THB is the police. KOM also facilitates contact between police officers who never worked with THB before and police officers who have experience with THB investigations.

7.4.3 *The Tax Authorities*

According to the representative from the tax authorities, they report to the police if they see breaches of legislation, have a suspicion about exploitation or if the accounting of a company is inconsistent. The tax authorities have no written procedures for how to file a report concerning THB to the police, but the representative explains that if they file a report they do it formally in compliance with general reporting requirements. As far as the representative knows, the tax authorities have never filed a report to the police concerning THB. What most often happens is that the police have a suspicion about THB and then contact the tax authorities and ask them to check in their registers and do joint controls.

Ten employees are functioning as a link between the tax authorities and the police. According to the representative, they could facilitate the exchange. Information will always be directed to the local police, to the police officers that the tax authorities normally cooperate with. Some controls have been initiated based on a police assumption about poten-

tial THB. When participating in a control with the police, the tax authorities look for anything that could give a suspicion about tax evasion. Police officers participating in the controls are often from the immigration police with a thorough focus on immigration issues.

If a caseworker would have a suspicion about THB, he/she would talk to the manager and then contact the police, explain about the case and ask if it could be THB. The information would be sent by snail mail or personal delivery. The representative stresses that the tax authorities have very good opportunities for reporting to the police. They would call at first and ask to whom the e-mail should be sent. The representative explains that the tax authorities sometimes participate in larger investigations led by the police together with the National Criminal Investigation Service and the Labour and Welfare Administration. The police initiate the investigations and then bring the other authorities on board.

7.4.4 *The Directorate of Immigration*

According to the representative, information about specific cases is exchanged to the police, and the Directorate has an internal written procedure defining when information is to be given to the police. The caseworkers in the Directorate of Immigration, however, seldom get information about possible THB for labour exploitation, as the systems do not contain that much information relevant to uncover such crime, especially in the applications for residence and work permits. It is more likely that the Labour Inspection Authority or the police would see it during an inspection and then inform the Directorate. Sometimes the police request information from the Directorate and such meetings are arranged ad hoc.

In general, the THB unit or contact person at the local police, the National Criminal Investigation Service or the Police Directorate is contacted when the Directorate needs advice regarding the cooperation with the police. The Directorate exchanges information with the police from case to case as a statement from the police is required in applications for a limited residence permit for victims or applications for a residence permit for witnesses in cases of THB.

The main coordinator is a default contact person if a local police department needs to contact someone in the Directorate of Immigration, but is in doubt of who to call.

According to the representative from the Directorate of Immigration, the Directorate has nominated THB contact persons in each branch of the Directorate, facilitating an easy flow of information if the police or

other entities request it. The main THB coordinator has a network of contact persons to reach out to across the Directorate who gather relevant information. If a caseworker has a THB suspicion, the THB contact person of the local department contacts the main THB coordinator who, if necessary, would give advice or help contact the police or other entities. Before filing a report to the police, the caseworkers would gather as much information as possible from the immigration registers.

7.4.5 *The National Criminal Investigation Service*

According to the representative from the National Criminal Investigation Service, investigations are only seldom initiated based on information received from other PAs. The PAs are, however, very helpful and provide information whenever the police request it.

When other PAs have THB-related information, they should contact the THB unit at the National Criminal Investigation Service and the local police. If in doubt, the THB unit at the National Criminal Investigation Service could always be contacted. The THB unit would, if necessary, support the local police during a potential investigation. A national THB expert group with THB knowledgeable police personnel from the districts is about to be re-established, and this group will, according to the representative, hopefully be the new contact point for any questions to the police regarding THB. The group would then handle received THB information and decide what to do with it and which district should have the case.

The cooperation between the National Criminal Investigation Service and other PAs is bilateral. The cooperation is not formal, but based on professional networks. The National Aliens Centre functions as a bridge between the Directorate of Immigration and the National Criminal Investigation Service.

Nordic Exchange

The National Criminal Investigation Service can facilitate exchange of information to other Nordic police authorities through the SIENA information system. The National Criminal Investigation Service would also call the other Nordic police authorities, if necessary, and inform them of the SIENA request and discuss the case. According to the representative, the information channels are available, but are not often used.

7.5 Sweden

7.5.1 *The Migration Agency*

Every time the Migration Agency detects a potential THB case, it is reported to the police. According to the representative, an investigation is initiated in 50% of the cases. The Central Anti-Human Trafficking Coordinator exchanges information from the embassies to the police. According to the representative, any caseworker can exchange information to the police. However, for them to see the whole picture, someone at the police should be assigned with gathering all this information and put it together.

Information on smaller cases is exchanged locally from the caseworker to the local police.

According to the representative, the Migration Agency has a guideline including a procedure for how a caseworker should contact the police with a suspicion about THB. The suspicion is filed in an internal data system and the Central Anti-Human Trafficking Coordinator of the agency is informed. Then the coordinator, one from the reference group of the coordinator or the THB coordinator of the unit, contacts the police. Each region has a THB coordinator who is in charge of internal THB training and contact with the police and the County Administrative Board. The coordinator will assist the caseworker, if necessary. The police do not have access to the internal data system, and information from the system concerning the case is, therefore, printed out and faxed or e-mailed to the police.

7.5.2 *The Department of National Operations (Police)*

According to the representative, all THB investigations are conducted at regional level by the regional police. Some police officers in the bigger town regions in the regional police departments are educated in the indicators of THB. In regions without a THB unit, the THB investigations are conducted by the serious crime units.

If another PA has information related to THB, they can contact a person or department at any level within the police – from local to national – with a memo, and then the police themselves make sure that the information is reported to the regional level. If other Nordic authorities contact the local police stations with THB information, the local police will pass it on to the regional police.

According to the representative, the default point of contact for other PAs is the Department of National Operations. The County Administrative Board can also be contacted and then they will pass on the information to the police. In all matters, the information will be sent to the regional level.

Nordic Exchange

According to the representative, the police can facilitate the contact to other Nordic authorities through the international police cooperation. The police have had the need to contact other Nordic police authorities in relation to THB, but they do it very seldom. The representative explains that the channels for information go either through the SIENA information system, direct contact or liaison officers. The representative requests more Nordic police cooperation on THB.

7.5.3 The Tax Agency

The representative explains that the Tax Agency sometimes participates in inspections led by the police. The police can ask the Tax Agency to start a tax investigation on a company and if any THB information is detected, it is passed on to the police. The Tax Agency has a cooperation with the police concerning the berry-picking industry in order to prevent exploitation. According to the representative, the exchange of the information to the police on individual cases is running smoothly, but the Tax Agency would like to be able to exchange information also at the strategic level.

According to the representative, suspicions about THB are given to the local police.

The representative explains that if a caseworker has a THB suspicion, a lot of information has to be collected in order for the police to be able to initiate an investigation. If a caseworker gets suspicious about THB, a report will be filed to the police, but in order to collect more information it is necessary for the caseworker to exchange information with other PAs too, and this is not legal today. Some of the caseworkers are trained in the indicators of THB and if potential THB information is observed during a control, it is reported to the police. As far as the representative knows, no procedures exist on how to contact the police.

8. For the Record

The purpose of this section is to list some examples of internal organization, challenges, good examples and recommendations for the action against THB mentioned by the representatives during the interviews. This is done in order for the participating authorities to be inspired by one another and gain insight into and inspiration for potential new areas of focus, new initiatives or structural changes in order to better fight THB.

“Internal Organization Concerning THB” covers internal organization with relevance for THB as described by the representatives during the interviews. Internal organization refers to initiatives taken internally within the PA with an explicit focus on THB.

“Highlights” covers what was highlighted by the representatives during the interviews as positive measures or good examples. The positive measures and good examples refer to measures taken or procedures in place strengthening the action against THB and the specific exchange of information to the police regarding THB.

“Challenges” covers some of the main challenges presented by the representatives during the interviews. Challenges refer to minor or large obstacles hindering a smooth and easy exchange of information concerning THB, as well as challenges in general concerning cases of THB and challenges internally in the PA creating difficulties in the action against THB.

“Potentials” covers some of the ideas for new initiatives and initiatives already in the pipeline as mentioned by the representatives during the interviews.

8.1 Iceland

8.1.1 *Internal Organization Concerning THB*

In the Directorate of Labour and in the Directorate of Immigration all frontline employees working with work permit applications have had lectures by the police on THB indicators.

The legal department of the Directorate of Labour has made a form for the employees to fill out when they have a THB suspicion and also a written internal procedure on how to contact other PAs is in the making.

In the Directorate of Immigration, all THB suspicions are sent to one specific THB responsible person within the Directorate that is responsible for the contact to the police and registers all THB cases and suspicions.

In the police, most of the police investigators have had lectures on THB indicators, and the THB department is in charge of screening relevant cases for possible THB.

8.1.2 Highlights

The representatives from the Directorate of Labour emphasize the importance of continuity as it makes it easier to share information on THB when the contact persons are always the same.

The representative from the Directorate of Immigration emphasizes the latest focus on awareness raising. Because of that all suspicions are looked into today. Furthermore, the representative highlights the formal meetings as they create a network of contact persons for ongoing cases. The representative also highlights the possibility to call the police and tell them that a report will be filed because it creates assurance as to whether the report will be received.

The representative from the Reykjavik Metropolitan Police emphasizes the informal contact network as a good forum to share even just suspicions and discuss what to do and who to contact next. At a Nordic level the representative emphasizes study trips and exchange programmes for police officers where knowledge can be shared.

The representative from the Ministry of Welfare explains that when the authorities meet in different groups, it makes it easier to know who to contact and to recognize modus and trends within the field. The meetings also encourage better and more coordinated services.

8.1.3 Challenges

According to the representative from the Reykjavik Metropolitan Police, there is not a lot of funding in the Action Plan, so creative thinking is necessary for taking initiatives against THB. The representative explains that THB cases are time- and resource-consuming and that the victims are not always willing to testify, which sometimes makes it quite difficult to get a case to court. The representative guesses that there are more not-detected THB cases and explains that you have to look for THB in order to see THB.

The representative from the Ministry of Welfare explains that it is difficult to exchange information from the social system to the police because the victims usually trust nobody. The social system can only share information with the police with the victim's permission.

8.1.4 Potentials

The representatives from the Directorate of Labour recommend that PAs should have more information about THB so that they know *what* to look for in order to detect something suspicious.

The representative from the Directorate of Immigration emphasizes that the law should be reviewed and updated and that a written procedure should be made concerning communication channels. The representative suggests that the Ministry of Interior, which is in charge of coordinating the THB action, should make a list with appointed contact persons from all PAs. The representative says that fixed and formal procedures could make it easier to keep track of all suspicions. The representative would like more information sharing on trends between Nordic authorities.

The representative from the Reykjavik Metropolitan Police asks for more information sharing on trends and ongoing cases between the Nordic countries. The representative suggests creating a newsletter for knowledge and information sharing between THB experts in the Nordic countries. The representative from the Reykjavik Metropolitan Police also suggests an update of the law. The representative emphasizes that the authorities should know more about *how* to share information and that the key persons from the communication network should be mandated to exchange information.

8.2 Finland

8.2.1 Internal Organization Concerning THB

The National Bureau of Investigation is supporting THB investigation teams and screens for THB cases. Nowadays, five people are working on THB and illegal immigration in the Bureau and are informed when a local police office starts a THB investigation. Another working group with two representatives from each of the eleven districts meets twice a year for training sessions on THB cases and trends. One of the two represent-

atives from each district is afterwards responsible for THB training in the district.

The caseworkers in the Asylum Unit is trained in detecting THB indicators. Also the staff in the reception centers receive information and training in detecting THB. There is a THB expert in the Immigration Unit to whom other caseworkers send their case if they detect THB indicators. The Immigration Service has a THB guideline that is found in a database accessible for all caseworkers.

After the publishing of a report on THB by the National Rapporteur in 2010, the Occupational Safety and Health revised their guidelines for inspections for foreign labour. The revised guideline included a guidance for what to do when inspectors suspect THB. All employees have access to the guidelines.

In risk countries the visa officers in the embassies are often trained in THB. A new Visa Consultation Team is tasked with handling and assisting embassies in specific difficult cases. The Visa Consultation Team will carry out controls of visa decisions in the system and look for potential THB cases. The Team might also initiate THB training for the staff at the embassies.

8.2.2 Highlights

The representative from the National Bureau of Investigation explains that the employees from the police participate in national training sessions together with personnel from other PAs. The lectures are mainly arranged together with the national assistance system for victims of THB, and during the lectures the police are invited to contribute with general data on THB and inform about the cooperation between the assistance system and the police. The police also have training sessions together with other Nordic police authorities about THB legislation and cases.

According to the representative from the Immigration Service, the well-functioning of databases is the key, meaning that all data have to be up-to-date and all relevant employees must have access to all relevant data. The representative emphasizes that written procedures are important in order to assure that the exchange of information is not reliant on individual contacts between employees who might change job or go on leave. The Immigration Service has one main address for THB information, which three employees are responsible for checking.

8.2.3 Challenges

The representative from the Ministry of Employment and the Economy explains that the ELY Centres could process cases potentially linked to THB, but that the employees neither have sufficient information about THB in order to detect it, nor have any procedures for what to do with the information. The representative explains that the process of implementing a focus on THB has been quite slow and therefore the TE offices lack information and procedures regarding THB. The representative mentions that the fact that it is not possible to enter information on the employers into the UMA system, hinders the exchange of information.

The representative from the Immigration Service explains that it is difficult to contribute with information to an investigation since the crime is often stopped from happening when an application is rejected. The representative mentions that it is a problem that the Immigration Service does not have a database with names and restaurants from previous cases, where they could detect if an applicant, reference or employer previously has been involved in other cases.

The representative from the Occupational Safety and Health highlights that it is important that THB cases are processed quickly. The representative adds that it is difficult to detect THB during inspections as the inspectors mainly talk with the employer and not the employees, who often do not speak Finnish or English, and if they do, they are often unwilling to talk to the inspectors. If the employer presents perfect papers, it is difficult to do something. Furthermore, the focus of the inspection is the main entrepreneur, who often does not know the circumstances under which the subcontractors' employees work. The representative has sometimes had a suspicion about THB, but the case just slipped away as nobody informed the police of the case. The representative is under the impression that the police are not too eager to receive THB cases as the investigations are quite resource-consuming.

The representatives from the Ministry of Foreign Affairs explain that the embassies definitely see THB victims, as a visa only costs EUR 60 and is one of the cheapest ways for transporting a victim. The representatives explain that – when the victims or the traffickers apply for a visa – they have a new, nicely built identity, often with purchased supporting documentation, and the only thing the embassies can do is to reject their visa application. One representative explains that THB always starts with a visa.

8.2.4 Potentials

The representative from the Ministry of Employment and the Economy recommends creating an early warning system, notifying the TE Offices about police investigations on specific employers. The representative recommends arranging working meetings between the police and the TE Offices concerning THB. Furthermore, the representative recommends awareness raising in the TE offices, lectures on indicators of THB and seminars on how to look for indicators in case processing.

The representative from the Occupational Safety and Health asks for contact details on a key THB responsible employer within the police, assuring the processing of given information. The representative suggests establishing a multi-official team for workplace inspections making it possible to inspect the employees' living conditions. The representative further recommends that all labour inspectors should be educated in THB as any inspector could come across it. The representative estimates that there is a need for a THB unit within the Finnish police.

The representatives from the Ministry of Foreign Affairs are asking for contact details for THB key personnel in all Nordic police authorities as rejecting an application does not stop THB, but investigations could do it. Sometimes the embassies have addresses of potential human traffickers and would prefer to give that information to the police or the Border Guard. The representatives highlight that one of the most important things for the information to be exchanged is for the police to reply to given information.

8.3 Denmark

8.3.1 Internal Organization Concerning THB

The Quality Procedure of the Working Environment Authority includes a list of specific THB indicators detectable during labour inspections and procedures for what to do during the inspection.

The Visa Office/Immigration Service has focus on THB and potential perpetrators among the visa references.

The National Centre of Investigation nationally monitors cases related to THB and sometimes assists districts during THB investigations. The districts are only able to monitor their own cases, whereas the National Centre of Investigation has access to all cases nationally.

The Tax Administration has a group of eight employees dedicated to working with THB cases. All THB-related cases are sent to them. The

group lectures outgoing Tax Administration personnel in THB indicators and has distributed a pamphlet on how Tax Administration employees can look for THB indicators during controls and who to contact about THB. Furthermore, a THB questionnaire is given to relevant employees for them to fill out if they discover THB during a control. The group participates in operations with the police, and during the operations the group is posing all relevant questions to the potential victims concerning the organizing network. The group has an excel-based system where all information, even minor details, is registered. This enables them to detect when a person/address/company is involved in several cases.

At the embassies the caseworkers are alert to potential THB cases in areas specifically known to generate victims.

8.3.2 Highlights

The representative from the Working Environment Authority explains that the authority attends a working group managed by the Danish Centre against Human Trafficking. The participants in the working group are various employees that could meet potential THB victims in their daily work. The contacts made in this group create an outset when cooperation is initiated.

The representatives from the Danish Centre against Human Trafficking highlight informal meetings and current contact as important for the cooperation. Besides sharing information regarding THB, the representatives emphasize sharing information about different ways of working, mandates, obligations, restriction, etc. to ensure respect, easy cooperation and to built up trustworthy relationships. The representatives also emphasize the task force as it enhances the cooperation on ongoing cases and speeds up the casework.

The representative from the National Centre of Investigation mentions that all the forums and working groups help create the initial contact, which makes it easier to establish contact concerning ongoing cases.

The representative from the Agency for International Recruitment and Integration highlights that the Danish Centre against Human Trafficking has given lectures for approx. twenty employees informing them about the indicators of THB and the possibility to contact the Centre Against Human Trafficking.

The representatives from Tax Administration emphasize the forums and working groups that create the initial contact and provide the Tax Administration with contact information on THB key employees from the other PAs.

8.3.3 Challenges

The representative from the National Centre of Investigation explains that some police districts are challenged by lack of resources leaving them with little time for and knowledge of THB cases. The lack of resources sometimes hinders the involvement of other relevant authorities in investigations. The representative also explains that it can be quite challenging to contact some PAs due to their internal organization.

The representatives from the State Administration explain that they have very limited internal investigation opportunities in case they have a THB suspicion, which makes it challenging to gather enough information for filing a report to the police. The State Administration is not represented in any forum focusing on THB.

The representative from the Agency for International Recruitment and Integration explains that THB is not a focus area and that the employees do not know the indicators of THB. The Agency for International Recruitment and Integration is represented in a working group against forced labour, but the representative explains that this seems to be merely on a strategic level. The representative also explains that the daily workload makes it difficult to follow a case “long enough” to gather sufficient information for filing a report to the police.

The representatives from the Tax Administration explain that an enormous amount of paperwork has to be done when filing a report to the police and would prefer to have a THB-responsible contact person assuring that the reports were actually received.

The representative from the Visa Office/Immigration Service explains that focus is on visa processing and potential misuse of the visa system, and not THB, and therefore the employees of the visa department are not trained in the indicators of THB. It is, however, part of their job to detect misuse of the visa system and potential THB. The representative explains that the visa caseworkers do not receive information from the cross-ministerial meetings on THB.

The representative from the Citizen Service, Visa and Passport/Ministry of Foreign Affairs explains that when a visa is rejected, no information is given to the police for them to initiate an investigation. Therefore, the misuse is hindered, but the criminal network behind the exploitation is not exposed. The representative further explains that the misuse (e.g. working on a tourist visa or overstaying) is not taking place before the applicant arrives in Denmark, which makes it impossible to detect the crime during the processing. The representative mentions that THB is one of many focus areas.

8.3.4 Potentials

The representative from the Working Environment Authority highlights that information campaigns and information about ongoing cases in the media help enhance the THB attention of the inspectors.

The representatives from the Danish Centre against Human Trafficking recommend that the police give more specific information on what sort of information would be relevant for them in order to initiate investigations. The representatives further suggest that the National Centre of Investigation stays the main national contact point and assures more THB awareness in the police districts. The representatives highlight that it is necessary for all PAs to trust each other and know about each other's mandate concerning THB. The representatives suggest establishing more confidential cooperation between the Danish Centre against Human Trafficking and the police where information could be exchanged freely and continuously.

The representative from the National Centre of Investigation recommends that more meetings should be arranged between all relevant PAs. The representative further mentions that the creation of a list with contact details of key THB personnel in each PA could enhance the exchange of information. The representative explains that creating a common mailbox for all relevant authorities could make it possible for the police to inform more PAs about THB cases. More authorities being familiar with police operations concerning THB would enhance the focus on THB. Furthermore, the representative recommends more focus on THB in the districts and lectures on THB for police officers patrolling in the streets.

The representatives from the State Administration recommend that the employees get lectures on the indicators of THB as that would contribute to the focus on THB.

The representative from the Danish Agency for International Recruitment and Integration highlights as follows: the employees have to *know* the indicators of THB, the supervisors/politicians have to *accept* resources/time for following suspicious cases, and the control unit has to know *where* to deliver the information. The representative recommends lectures for all employees on the indicators of THB given by the Danish Centre against Human Trafficking, the police and the Danish Agency for International Recruitment and Integration in cooperation. The representative recommends that one single unit in the police could be in charge of receiving THB-related information and coordinating internally between the police districts. The police should have one single

e-mail address for THB information so that THB cases would not disappear due to organizational changes.

The representatives from the Tax Administration recommend one nationally operating police THB task force, mandated to decide which district should be responsible for a THB investigation and assuring coordination between the districts. The representatives would like to participate in more operations and inspections and to create awareness in the police of their THB group and possible contributions. The representatives suggest to have meetings with the police before filing a report. During those meetings the Tax Administration could present specific cases, and the police could decide if the cases are relevant and if sufficient resources are available for investigating the cases. In this way the resources of the Tax Administration could be dedicated to the cases prioritized by the police.

The representative from the Visa Office/Immigration Service recommends making a list of the contact details of THB key persons from each relevant PA. The representative highlights that one specific THB contact point in the police would be beneficial for the exchange of information. The representative suggests regular meetings between the key persons, so that everyone knows who the contact persons are, and also more operational meetings with focus on ongoing investigations. The representative asks for the possibility of calling the police informally with just suspicions. The representative recommends that more employees should be lectured on THB.

The representative from the Citizen Service, Visa and Passport/Ministry of Foreign Affairs suggests that all Ministry of Foreign Affairs employees are lectured on THB indicators prior to a stationing abroad. The representative suggests making a list of contact details of THB key persons from all relevant authorities. The representative recommends more information sharing with the police. The police could contact the Office for Citizen Service, Visa and Passport and get THB country profiles and information about general trends, e.g. the Nigerian overstaying their visa are often from the same region. Vice versa, if the police saw several victims from a specific geographical area, the relevant embassy could be notified so that they could screen visa applications for specific profiles. When an embassy rejects an application based on a THB suspicion, it would be ideal to be able to call the police in Denmark and have them investigate the reference.

8.4 Norway

8.4.1 Internal Organization Concerning THB

Since 2006 the Labour Inspection has carried out a project to combat social dumping. The workplaces for the labour inspections are chosen based on tips from e.g. migrant workers or employees/employers organizations, statistics and former cases. People can give tips through the webpage, they can call or come to the Service Centre. The labour inspectors always strive to talk to the employees during the inspections as many of the employees in high risk workplaces are unlikely to tell the truth.

The Tax Authorities carry out controls regarding illegal, undeclared economic transactions and tax evasion and are attentive to undeclared salaries and unregistered labour in combination with allocation of welfare provisions, which is often related to undeclared labour and has also been the modus in some THB cases. During field inspections, the Tax Authorities could get a suspicion about THB as they control both working conditions and all relevant paperwork.

In the Directorate of Immigration, THB is considered to be a relevant risk in all case-processing. The Directorate has a Competence Team assuring a coherent effort against THB. There is an internal guideline describing the role of the contact persons in the team. The Directorate has guidelines for the caseworkers concerning THB and employees are trained in THB indicators. The training is aimed at the employees so that the employees understand how THB might be related to their area of work.

The THB unit of the National Criminal Investigation Service screens all relevant cases and information in the national intelligence database. The database contains all kinds of intelligence on THB, which makes it possible for the unit to have a national overview. Each district has a THB responsible police officer. It differs from district to district which department the officers are working in and which background and daily tasks the officers have.

8.4.2 Highlights

According to the representative from the National Criminal Investigation Service, an intelligence and analysis centre will be established on the 1st April 2016, mandated to identifying economic crimes. This centre will help establishing frequent channels for exchange of information and formalizing the exchange. The representative estimates that this will enhance the flow of information in other areas as well. The group will con-

sist of the Tax Authorities, the police, the Labour Inspection Authority, the Customs and the Norwegian Labour and Welfare Administration. The aim of this expert group is to contribute to better communication with other PAs on behalf of the police.

According to the representative from the Labour Inspection Authority, four service centres for foreign workers have been established in Norway.³¹ In these centres, the Tax Authorities, the police, the Immigration Authorities and the Labour Inspection Authority work together. A foreign worker can do all paperwork related to work permissions here. The foreign workers often come to these centres and contact the Labour Inspection Authority if they have a problem, lose their job or do not get paid. In these service centres, a lot of information is gathered and shared between the authorities concerning problems at workplaces. This information is used as tips for further inspections. The representative estimates that it is possible that a victim might turn up at a service centre in situations characterized as grave social dumping, but which may be THB. The representative also mentions the upcoming national centre for analysis and intelligence.

According to the representative from the Coordinating Unit for Victims of Trafficking (KOM) in Norway, a number of local inter-sector operational teams exist. These teams are local or regional and exchange information about THB. The teams work well in some cities where all participants meet physically, exchange information and discuss the cases without being concerned.

8.4.3 Challenges

According to the representative from the Directorate of Immigration, it is quite difficult for the caseworkers to get information about possible THB for labour exploitation, especially in the application for residence and work permits, as they can only see the information that is in the immigration registers. The Directorate of Immigration rather detects breaches of the Immigration Law. Furthermore, there have not been many investigated THB cases on labour exploitation, which makes it challenging for the caseworkers to be regularly conscious about THB when processing applications for residence and work permits. In the asylum procedure, applicants with special profiles are screened for indicators of THB. When processing applications for residence and work permits, no such systematized indicator-based screening is done. Cases

³¹ A fifth centre will open in April 2015.

are more often detected because the police or other instances report possible misuse, fraud or THB.

According to the representative from the Labour Inspection Authority, it is a challenge when inspections are carried out together with the police. The police authority participating in the inspections is the Immigration Police who has focus on immigration law and illegal work rather than potential THB and devastating working conditions. When the police participate in an inspection, the workers may be less eager to talk to the labour inspectors. According to the representative, a challenge for the police is that THB investigations may demand a lot of investigative resources to bring cases to court. The representative is under the impression that there is a great variety in the level of THB knowledge between the police districts, but that the police are trying to ensure better competency across the country.

According to the representative from the Coordinating Unit for Victims of Trafficking (KOM), it is quite difficult for KOM to make a good and thorough data collection as all reporting for the annual report is based on voluntary anonymous reporting. According to the representative, the THB system is challenged by its structure as it is very much carried by a few passionate people. Furthermore, there is a discrepancy between urban and rural areas where the larger city districts are more knowledgeable about THB, and the smaller countryside districts less so. According to the representative, one of the main challenges is the lack of communication between the different PAs due to obstacles they face in lack of legal basis for sharing information.

According to the representative from the Tax Authorities, it is difficult for the caseworkers to get a suspicion about THB, based on the information they see in their systems. According to the representative, it would not be possible for the Tax Authorities to get a THB suspicion based on the information registered.

8.4.4 Potentials

The representative from the Labour Inspection Authority estimates that the time may be right for awareness raising in order to be able to better identify THB and for developing a procedure. The representative highlights that the Labour Inspection Authority should just report what is seen during the inspections without necessarily labelling it THB. The essential is to provide information for the police to initiate an investigation. The representative recommends that the National Criminal Investigation Service should have a coordinating role and that the police should

have a clear THB system, providing the other PAs with contact details and clarifying who to call concerning potential THB information.

The representative from the Coordinating Unit for Victims of Trafficking (KOM) recommends that KOM is provided with a legal mandate for collecting data. Furthermore, the representative highlights the need for a KOM webpage with the National Action Plan, the Annual Report and other THB-related information.

The representative from the Tax Authorities recommends an internal evaluation and considers whether the Tax Authorities could detect THB indicators in their own systems. The representative suggests making a checklist that could create more awareness of THB between the caseworkers. Such a checklist would make it possible to consider THB when controls were made. The representative highlights that the Norwegian Tax Authorities would very much like to know more about how the Danish Tax Authorities work with THB.

The representative from the National Criminal Investigation Service recommends that the police meet internally and coordinate and discuss procedures and cases. The representative highlights that it is important that the key THB police officers know each other and share a common standpoint. The representative recommends that the police arrange knowledge building conferences for other PAs.

The representative from the Directorate of Immigration recommends establishing a coordinating forum on labour exploitation where a number of relevant PAs could meet regularly and share information on trends and suspicions. This organization would facilitate that the PAs could coordinate their efforts and pay attention to the same relevant issues.

8.5 Sweden

8.5.1 Internal Organization Concerning THB

The Migration Agency has a THB guideline for caseworkers and decision makers. The caseworkers prioritize the time necessary for looking into THB suspicions. In theory, all employees are trained in the indicators of THB, but at the moment many new employees are starting. The Agency is planning on creating an online training system to make sure that every employee is aware of THB. All THB cases are reported to the Central Anti-Trafficking Coordinator in order to create a national overview. The Coordinator has a reference group of five people to assist her. The group meets five-six times a year with the regional THB coordinators.

In the national-level police, two police officers are working only with THB. In the bigger cities specific units work to combat THB. The national level functions as a sort of knowledge centre in terms of best practice, former cases and court decisions for the smaller counties, if they have THB cases. The national level also produces intelligence memos for the counties in order for them to initiate investigations. The national level trains some regional-level officers in the indicators of THB. Aside from that, web-based training in the indicators of THB is accessible for everyone.

In the Tax Agency the employees are not trained in the indicators of THB.

8.5.2 Highlights

According to the representative from the Migration Agency, the central coordinator made some organizational changes last year. Each region of the agency has a THB coordinator today, and each unit within that region also has a THB coordinator. The coordinator at the unit level is responsible for training the caseworkers in the unit in the indicators of THB and to support them if they have a potential THB case. The unit coordinator reports to the regional coordinator, who once a month reports to the central coordinator.

According to the representative from the police, the County Administrative Board trains caseworkers from PAs in the indicators of THB. The police participate in some of these training sessions and inform the other PAs about what information is relevant for the police in relation to investigations.

According to the representative from the Tax Agency, the agency promotes fair competition. This is according to the representative part of the prevention of THB, since fair competition means fair salaries and good working conditions.

8.5.3 Challenges

According to the representative from the Migration Agency, all caseworkers are educated in THB. It is, however, quite challenging for the employees that process cases without meeting the applicants to detect potential THB information. The representative estimates that if more cases of THB should be detected, other questions should be posed to the applicants. The representative explains that the agency has many employees and large units making it difficult to connect similar cases between caseworkers and detect systematic misuse.

According to the representative from the police, the police are challenged by unclear legislation concerning THB and forced labour making it difficult to bring cases to the court. As THB investigations are expensive, other more easy-to-investigate cases are prioritized. The biggest challenge for the police is the lack of evidence in THB investigations. According to the representative, the police are challenged by the fact that the Swedish visa and work permits are often misused for smuggling people to Sweden. This could be exploited by traffickers as well. At the moment only police officers at the regional – and not the local level – are trained in the indicators of THB. The training of local-level officers is, however, in the planning. The representative explains that there is a dominant focus on THB for sexual exploitation and that the national-level police officers are hoping for a broader focus in the future.

The representative from the Tax Agency explains that the agency runs a project against serious organized crime in order to prevent people from coming to Sweden under false promises of good salary and working conditions. The representative explains that a number of people are lured to Sweden and then in one way or the other exploited for working under harsh working conditions. In the tax register, this is very difficult to detect as a system of double contracts are used where the formal papers look fine, but the informal are devastating. Therefore, the Agency has launched a prevention campaign. According to the representative, it is difficult for the agency to find evidence for forced labour as the victims are often unwilling to talk. In order to detect these cases, the representative underscores that the agency must have the possibility of exchanging information with other PAs.

8.5.4 Potentials

According to the representative from the Migration Agency, the action against THB needs more resources and funding in order to detect more cases. Furthermore, the representative underscores that it is necessary to focus on victims of all types of exploitation, not just sexual. The representative explains that the procedure is well functioning and what is necessary is education, information and resources at all levels. The representative is under the impression that the police authority is short-staffed and that the local knowledge of THB is quite diversified, as THB is prioritized only in some areas and therefore recommends more training for the police.

According to the representative from the police, the system and co-operation on THB is good, albeit more PAs must be included, especially the Working Environment Authority. Furthermore, the representative recommends more training for all relevant employees. The representative wishes to meet more often with the national THB coordinators from the other Nordic countries.

According to the representative from the Tax Agency, in order to detect fraud in reported salary and taxes, the information should be reported monthly and not yearly, as it is today. The representative further recommends changing the law of secrecy so that the Agency could exchange information with other relevant public agencies. The representative explains that more in-field inspections are necessary in order for them to find and protect the victims. The representative underscores that, as it is today, the risk for an employer of being caught for using forced labour is minimal.

9. Good Practice

The national police THB coordinators can be contacted when other public authorities do not know to whom in the police THB-related information should be sent, or if they experience any difficulties in the matter. The coordinators will then assure that the information is handled and brought to the right police department. If information has connections to other Nordic countries, the national police coordinators can facilitate the exchange of information across borders through the international police cooperation.

9.1 Contact details of the national THB coordinators (police)

Finland

- National Bureau of Investigation 24/7 Communications Centre.
E-mail: vlk.krp@poliisi.fi Phone: +358 295418612.
- National Bureau of Investigation THB Intelligence.
E-mail: lama.krp@poliisi.fi Phone: +358 295486853 (Petri Koskinen).

Denmark

- National Centre of Investigation THB.
E-mail: pol-nec-menneskehandel@politi.dk Phone: +45 41373757 (Kit Andersen).

Iceland

- National Expert THB.
E-mail: snorri@logreglan.is Phone: + 354 6115001 / +354 4441277 (Snorri Birgisson).

Sweden

- National Expert THB.
E-mail: per.englund@polisen.se / therese.kullman@polisen.se
Phone: +46 105639734 (Per Englund) / Phone: +46 10534043 /
+46 767753610 (Therese Kullman).
- National Expert and National Rapporteur THB.
E-mail: kajsa.wahlberg@polisen.se Phone: +46 105639190 /
+46 708414029 (Kajsa Wahlberg).

Norway

- National Criminal Investigation Service THB.
E-mail: knut.brattvik@politiet.no Phone: +4723208258 /
+4748112435 (Knut Bråttvik).

A number of initiatives were mentioned during the expert interviews as being crucial, when public authorities (including the police) wish to enhance their internal organizational focus on THB and better contribute to the exchange of information to potential investigations to the police. The following three types of initiatives are highlighted and some examples set forth for inspirational use:

Training

- The Finnish Immigration Service, the Norwegian Directorate of Immigration and the Swedish Migration Agency train employees in the indicators of THB, as any employee could come across THB in their case processing and therefore need to know which indicators to be alert to (see sections 8.2.1, 8.4.1, 8.5.1, 8.3.1).
- The Danish Tax Administration has trained all relevant employees participating in workplace inspections in THB indicators (see section 8.3.1).
- The Reykjavik Metropolitan Police has trained all relevant public authorities in the indicators of THB and information that could be relevant for THB investigations. Therefore, all relevant public authorities know who to contact in the police concerning what (see section 7.1.4).

Procedures

- The Finnish Immigration Service, the Norwegian Directorate of Immigration and the Swedish Migration Agency have online THB guidelines, accessible to all employees, describing indicators of THB and procedures for the caseworkers when detecting THB and contacting the police (see sections 8.2.1, 8.4.1, 8.5.1).
- The Danish Working Environment Authority has a Quality Procedure listing the THB indicators specifically relevant to workplace inspections and describing what to do during and after an inspection where THB information is detected and how to contact the police (see section 7.3.1).
- The Danish Tax Administration has distributed a pamphlet about THB indicators relevant to tax inspections, including guidelines for who to contact in case of indicators, and made a questionnaire to use for potential THB cases during inspections (see section 8.3.1).

Coordinators

- The Icelandic Directorate of Immigration has a THB coordinator in charge of collecting all THB-related information and for exchanging relevant THB information to the police (see section 8.1.1).
- The Finnish Immigration Service has a THB expert whom other employees contact if they detect THB (see section 8.2.1).
- The Swedish Migration Agency and the Norwegian Directorate of Immigration have national anti-trafficking coordinators, several regional coordinators and unit-level coordinators, creating an efficient channel of information and assuring THB focus during case processing (see sections 7.4.4, 7.5.1).
- The Reykjavik Metropolitan Police has established a communication network with a contact person from each public authority responsible for sharing THB information with the police. The appointment of key persons has resulted in more information being shared with the police (see section 7.1.4).

10. Conclusion

The aim of the project is first of all to uncover which potentially THB-related information is processed by the participating PAs.

This is done in section 3–4, showing that all the participating authorities process information that could potentially be related to THB. As the empirical data is confined by the answers of the representatives in the questionnaires and during the interviews, more, less or different information might be processed, which could also be of relevance to this report and its readers. This said, section 3–4 are not fully covering lists of all potentially THB-related information processed by the authorities, but information stated by the representatives as being potentially relevant.

The sections further show that the participating authorities not just process the information, but that they are also aware of the fact that this information might potentially be related to THB. First of all, the authorities are participating in this project, acknowledging that their field of work could be related to THB, and second of all, the representatives appointed to participate are able to point out this information.

This means that – regardless the facts that not all the participating authorities train or educate all employees in the indicators of THB and quite a few of the representatives experience a knowledge gap as to what information might be relevant for the police – there exists some degree of THB awareness within the participating authorities.

The intention of listing this information is both for the other authorities and the police to know that the information exists, but also for the authorities not participating to maybe see their field of work from another angle.

Secondly, the project seeks to uncover how potentially THB-related information is exchanged between PAs and the police. This is done in section 5–6, describing how the participating PAs exchange information to the police, to whom and whether such an exchange is relevant in a Nordic context.

The sections show that the overwhelming majority of the participating authorities seldom experience a need for exchanging information to the police in relation to THB and that close to none experience a need for exchanging such information in a Nordic context. This could be ex-

plained by the absence of relevant information or by a knowledge gap as to what constitutes this information.

Some PAs know exactly who to contact in the police with potentially THB-related information, but the majority experience a number of difficulties concerning this exchange. These difficulties mainly concern a confusion as to who exactly to contact with potentially THB-related information and as to what information might actually be relevant to the police. Furthermore, quite a few of the authorities experience a knowledge gap in the police concerning THB and some experience that internal organizational matters within the police authorities make it difficult to deliver potentially THB-related information.

The sections further show that some of the representatives find that the challenge is internal as their colleagues, directions, employees or caseworkers are not aware of THB or educated in the indicators of THB and therefore simply would not be able to detect potentially THB-related information.

Last but not least, the sections show no acknowledged need for exchanging information in a Nordic context. The representatives from the police all confirmed that they could facilitate such an exchange, if necessary, and the overwhelming majority of the representatives from the other PAs would contact the police if they needed to exchange information potentially related to THB across the Nordic borders.

The concern of a knowledge gap expressed by a number of the representatives could be covered by education and training in THB indicators and information relevant for police investigations for all relevant employees. This would also assure that the limited need for contacting other Nordic authorities and the police is not due to insufficient knowledge about THB.

The most important aim of the project, based on the findings in the interviews, is to develop a short, good practice of the exchange of information from other PAs to the police and distribute the good practice to the participating authorities.

Section 9 covers this good practice. During the project, it was quite clear that one of the essentials for the exchange to be facilitated is a default point of contact within the police whom the other PAs could call, e-mail and contact with any questions concerning THB, and who would make sure that the information filed to the police from the other PAs would find its way to the right department and not get lost due to organizational changes.

All the representatives from the police, therefore, provided the National Centre of Investigation with the contact details for such a default point of contact. These contact details are included in the good practice and the purpose is for other PAs to consult these, if necessary.

Furthermore, the good practice lists some examples of what was described by the representatives as systems, procedures or initiatives that enhanced the exchange of information. In connection to each of these examples the responsible authority is stated.

It is the purpose for other PAs to be inspired by this and then, if necessary, to contact the relevant authority and share knowledge and learn from their way of working with THB.

All the representatives have willingly agreed to share and distribute this report, including the good practice to relevant employees within their authority, contributing to the ongoing strengthening of the cooperation and knowledge sharing between PAs in the action against THB.

The report concludes that three cornerstones are essential in the exchange of information related to THB: training and education in the indicators of THB, clear channels of communication between the PAs and the police authorities and also organizational priority towards THB within each PA and police authority.

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Sammenfatning

Denne rapport indeholder resultaterne af et projekt finansieret af Nordisk Ministerråd og gennemført af Rigspolitiets Nationale Efterforskningscenter (NEC) i 2015–2016.

Projektet skaber indsigt i hvilken form for potentielt menneskehandel-relateret information, der sagsbehandles af en række offentlige myndigheder, og hvordan denne information udveksles mellem de deltagende offentlige myndigheder og politiet. På baggrund af dette er der blevet udarbejdet en kortfattet *god praksis*-guide, som er blevet udsendt til de relevante offentlige myndigheder. Projektet er primært baseret på resultatet af 25 interview med eksperter fra de deltagende myndigheder.

Hovedkonklusionerne viser, at alle de deltagende myndigheder behandler information som potentielt kan være relateret til menneskehandel. På trods af dette behandler de offentlige myndigheder ikke denne form for information dagligt, og derfor finder de det sjældent nødvendigt at kontakte politiet. Når de offentlige myndigheder kontakter politiet, efterspørger de fleste et centralt kontaktpunkt, så de kan være sikre på, at informationen når frem til den rigtige afdeling hos politiet.

Få af deltagerne har fundet det nødvendigt at kontakte andre nordiske landes offentlige myndigheder vedrørende menneskehandel. I tilfælde, hvor de deltagende offentlige myndigheder behandlede information, som var relevant for et andet nordisk land, tog de fleste af dem kontakt til politiet i det pågældende land. De deltagende politimyndigheder bekræfter, at de har mandat til at udveksle information med andre nordiske politimyndigheder, som har mandat til at udveksle information med relevante nationale offentlige myndigheder.

Rapporten konkluderer, at der fremadrettet bør være tre primære opmærksomhedspunkter, når det gælder udveksling af information vedrørende menneskehandel: Uddannelse i indikatorer for menneskehandel, klare kommunikationskanaler mellem de offentlige myndigheder og politiet samt organisatorisk prioritering af menneskehandel internt i hver offentlig myndighed og i politiet.

Rigspolitiets Nationale Efterforskningscenter ønsker med projektet og udgivelsen af rapporten, herunder *god praksis*-guiden, at bidrage til den aktuelle videndeling og opmærksomhed, når det gælder menneskehandel.

Appendix 1 – Flow of Information

The figure illustrates how information flows from national public authorities to the national police authorities and that the national police authorities can exchange information between one another across borders, receive information from relevant national authorities and ultimately send information in return.

Figure 1: PA = Public Authority, PO = Police

Note: Each cluster of circles represents one country separately.

Appendix 2 – Questionnaire, Police (example)

NORDEN – A Single “Market” for Trafficking in Human Beings, Cooperation Between the Nordic and Baltic Countries in Cases of Trafficking in Human Beings.

The Danish Police Directorate hereby invites you as a representative of the XX police to participate in the project on the exchange of information between public authorities in potential cases of trafficking in human beings by answering the following questionnaire. Please read this instruction, answer the questionnaire below and finally submit the questionnaire to [e-mail] – no later than XX. If you have any questions regarding the questionnaire or the project, please do not hesitate to contact me.

The purpose of the project is to contribute to a frequent and efficient exchange of information between authorities in order to better prevent trafficking in human beings and contribute to the prosecution of traffickers. The project is, therefore, in its outset focusing on the perpetrator, rather than the victim.

The aim of the questionnaire is to create an insight into potentially human trafficking-related information handled by each participating authority and procedures regulating the exchange of information with the police. I would, therefore, kindly ask you to answer the questions based on your own experience, but also to the extent possible on the experience of your colleagues, so that the answers represent the XX police in general. During the project you will be the representative of the XX police, and your answers will be referred to as the answers from “The Representative/informant/respondent/contact person of the XX police”.

The questionnaire furthermore creates an outset for the following interview. All of your answers will make part of a report and a good practice that will be distributed to the participating authorities.

The participating authorities from Finland are the XX, XX, XX, XX and XX. Similar authorities from Norway, Iceland, Sweden and Denmark will also participate in the project.

Preliminary definitions:

- *Trafficking in Human Beings*: [T]he recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. According to the Palermo Protocol Annex II, Article 3(a).
- *Modus and trends*: “Modus” is understood as the actions of a perpetrator/trafficker. “Trends” is when a similar modus is detected in several cases.
- *Human trafficking-related information*: Information, pointing towards one or more persons being victims of trafficking or information, pointing towards one or more persons facilitating the stay of others in a country with the purpose of exploitation.
- *Good practice*: Chosen examples on procedures for the exchange of human trafficking-related information between public authorities represented in the project.

Questionnaire

Background information about you and your answers:

- Professional title and department.
- Short description of your experience within the field of trafficking in human beings.
- From which departments within the police did you receive information for answering this questionnaire.

Which information* from other authorities could be relevant for the police in order to uncover current modus and trends within human trafficking? *(*E.g. information about misuse of visa applications, identification of victims, unregistered employment, presumed violation of tax regulations or similar*).

Are any employees or departments within the police responsible for screening cases for information related to human trafficking?

If no, why not? / If yes, how?

How many/which human trafficking-related cases (information) have the police received from other authorities within the last five years?

Where in the police* should other authorities go to with human trafficking-related information in order to assure the best possible exchange of information and, if needed, exchange to other relevant authorities? *(*E.g. a specific person, a local police department or the National Police*).

Have the police previously experienced any need for exchanging human trafficking-related information with other *national* authorities*, and, if yes, how is this exchange facilitated? *(*E.g. to the Ministry of Social Affairs or the Immigration Service*).

Have the police previously experienced any need for exchanging human trafficking-related information with other *Nordic** authorities, and, if yes, how is this exchange facilitated? *(*E.g. to the Directorate of Immigration or Labour in Norway or Sweden*).

Have the police previously experienced any challenges in relation to the exchange of human trafficking- related information with other Nordic/national authorities?

If yes, how?

Could the police facilitate the exchange of information on new modus and trends to other Nordic police authorities, and could these facilitate the distribution of this information to other national authorities in their country?

How would you be able to distribute the results of this project to other relevant departments within the police?

Appendix 3 – Questionnaire, Public Authority (example)

NORDEN – A Single “Market” for Trafficking in Human Beings, Cooperation Between the Nordic and Baltic Countries in Cases of Trafficking in Human Beings.

The Danish Police Directorate hereby invites you as a representative of the Immigration Service to participate in the project on the exchange of information between public authorities in potential cases of trafficking in human beings by answering the following questionnaire. Please read this instruction, answer the questionnaire below, and finally submit the questionnaire to [e-mail] – no later than XX. If you have any questions regarding the questionnaire or the project, please do not hesitate to contact me.

The purpose of the project is to contribute to a frequent and efficient exchange of information between public authorities in order to better prevent trafficking in human beings and contribute to the prosecution of traffickers. The project is, therefore, in its outset focusing on the perpetrator, rather than the victim.

The aim of the questionnaire is to create an insight into potentially human trafficking-related information handled by each participating authority and procedures regulating the exchange of information with the police. I would, therefore, kindly ask you to answer the questions based on your own experience, but also to the extent possible on the experience of your colleagues, so that the answers represent the Immigration Service in general. During the project you will be the representative of the Immigration Service and your answers will be referred to as the answers from “The Representative/informant/respondent/contact person of the Immigration Service”.

The questionnaire furthermore creates an outset for the following interview. All of your answers will make part of a report and a good practice that will be distributed to the participating authorities.

The participating authorities from Finland are XX, XX, XX, XX and XX. Similar authorities from Norway, Iceland, Sweden and Denmark will also participate in the project.

Preliminary definitions:

- *Trafficking in Human Beings*: [T]he recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. According to the Palermo Protocol Annex II, Article 3(a).
- *Modus and trends*: “Modus” is understood as the actions of a perpetrator/trafficker. “Trends” is when a similar modus is detected in several cases.
- *Human trafficking-related information*: Information, pointing towards one or more persons being victims of trafficking or information, pointing towards one or more persons facilitating the stay of others in a country with the purpose of exploitation.
- *Good practice*: Chosen examples on procedures for the exchange of human trafficking-related information between public authorities, represented in the project.

Questionnaire

Background information about you and your answers:

- Professional title and department.
- Short description of your experience within the field of trafficking in human beings.
- From which departments within the Immigration Service did you receive information for answering this questionnaire.

Which information* is handled by the Immigration Service that might be relevant for the police in order to uncover modus and trends within trafficking in human beings? *(E.g. in relation to applications for residence permits, misuse of travel or educational documents, similarly filled-out applications from a specific geographical area).

Are any employees or departments in the Immigration Service responsible for screening cases and applications for information related to human trafficking?

If no, why not? / If yes, how?

How many/which human trafficking-related cases/information has the Immigration Service exchanged with the police within the last five years?

Where to in the police has this information been directed? **(E.g. a specific person, a local police department or the National Police).*

Has the Immigration Service previously experienced any challenges in relation to the exchange of human trafficking-related information with the police?

If yes, how?

Has the Immigration Service previously experienced any need for exchanging human trafficking-related information with other *national* authorities*, and, if yes, how is this exchange facilitated? **(E.g. to the Tax Administration or the Ministry of Foreign Affairs).*

Has the Immigration Service previously experienced any need for exchanging human trafficking-related information with other *Nordic** authorities, and, if yes, how is this exchange facilitated? **(E.g. to the Directorate of Labour or the police in Norway or Iceland).*

How would you be able to distribute the results of this project to other relevant departments within the Immigration Service?

Appendix 4 – Case, Police (example)

NORDEN – A Single “Market” for Trafficking in Human Beings, Cooperation Between the Nordic and Baltic Countries in Cases of Trafficking in Human Beings.

In relation to the research project executed by the Danish Police Directorate concerning the exchange of potentially human trafficking-related information between public authorities, I hereby invite you to read through the following case of human trafficking.

Please consider the following points after reading the case and bring the case for our planned interview:

- The current procedures and mandate for the XX police regarding exchange of human trafficking-related information to other Nordic police authorities.
- Initiatives that could enhance the current procedure for exchange of information.
- Future areas of focus concerning exchange of information.
- Which forums where human trafficking-related information is exchanged, is the police represented in?
- If the case had connections to another Nordic country, would the police be able to contact the relevant authorities in that country and inform them about a new modus?

Please do not hesitate to contact me, if you have any questions regarding the case or the project.

Case

The immigration authorities have during the last couple of months processed a number of applications from third country nationals who all wish to work as chefs in different restaurants in Denmark. All the applications are for work and residence permits. The immigration authorities have registered some peculiar similarities between the applications and are now contacting the police with the following information.

The immigration authorities have received a number of applications for work and residence permits. All the applications are concerning positions as head chefs with a monthly income on EUR 5,000. All the applications include a similar standard contract, and the hand writing in the applications and the contracts appear to be identical. The applications have been handed in at the same embassy and all the applicants wish to start at the same date. The contracts state a working period limited to four years. Some names appear on several applications. The different restaurants are apparently not connected. All the applicants originate from the same geographical area in China.

Appendix 5 – Case, Public Authority (example)

NORDEN – A Single “Market” for Trafficking in Human Beings, Cooperation Between the Nordic and Baltic Countries in Cases of Trafficking in Human Beings.

In relation to the research project executed by the Danish Police Directorate concerning the exchange of potentially human trafficking-related information between public authorities, I hereby invite you to read the following case.

Please consider the following points after reading the case and bring the case for our planned interview:

- The current procedures and mandate for the XX regarding the exchange of information related to human trafficking to the police.
- Initiatives that would enhance the current procedure for exchange of information.
- Future areas of focus concerning exchange of information.
- Which forums where human trafficking-related information is exchanged, is the XX represented in?
- If the case had connections to another Nordic country, how would the XX contact the authorities in that country?

Please do not hesitate to contact me, if you have any questions regarding the case or the project.

Case

In February 2015 the Danish police arrested 101 people for their involvement in the largest Danish-based case of trafficking in human beings for criminal activities. Of the arrested 22 were charged with trafficking in human beings, while 65 were potential victims of trafficking.

The victims were transported to Denmark where the perpetrators exploited the victims' identities. Together with the victims, the criminals presented themselves at the authorities receiving personal security numbers and EU-residence permits for the victims. The criminals

misused the identities of the victims for bank loans, for buying luxury goods on-line, leasing cars and establishing fraudulent companies with the victims as shadow employees and straw persons, all without the consent of the victim.

Appendix 6 – Interview Guide (example)

How is the work of the XX related to human trafficking?

Which information* is handled by the XX that might be relevant for the police in order to uncover modus and trends within trafficking in human beings? **(E.g. in relation to visa applications from students or au pairs, misuse of travel documents, similarly fulfilled visa application and same reference person in several applications).*

How can the information mentioned be relevant?

Has any of the information led to a suspicion about human trafficking?

Are any employees or departments in the XX responsible for screening cases and visa applications for information related to human trafficking?

How are the employees trained in detecting cases of human trafficking?

Do the employees refer to the THB expert both regarding asylum interviews and applications for visas?

How many/which human trafficking-related cases/information has the XX exchanged with the police within the last five years?

How does the police contact the XX if they have a suspicion?

What kind of suspicion might that be?

What kind of cases are reported to the police?

Whereto in the police has this information been directed? **(E.g. a specific person, a local police department or the National Police).*

Does the XX have a specific contact list that is updated?

Is someone responsible for contacting the police?

Does the XX have a procedure for contacting the police?

Has the XX previously experienced any challenges in relation to the exchange of human trafficking-related information with the police?

Explanation of “not every information has been given that should have been”?

Elaboration on “extensive powers”?

Has the XX previously experienced any need for exchanging human trafficking-related information with other *national* authorities*, and if yes, how is this exchange facilitated? **(E.g. to the Ministry of Welfare or the Ministry of Foreign Affairs).*

How and when does the XX contact other public authorities?

Does the XX have a procedure for that?

Any specific contact persons?

Has the XX previously experienced any need for exchanging human trafficking-related information with other *Nordic** authorities, and if yes how is this exchange facilitated? **(E.g. to the Directorate of Labour or the police in Norway or Finland).*

How would you be able to distribute the results of this project to other relevant departments within the XX?

Do you have anything you would like to add before we proceed with the case?

The current procedures and mandate for the XX regarding exchange of information related to human trafficking to the police?

Initiatives that could enhance the current procedure for exchange of information?

Future areas of focus concerning exchange of information?

Which forums where human trafficking related information is exchanged, is the XX represented in?

Could the case be realistic in relation to your case processing?

How would a case like that unfold realistically?

How would you contact the police?

How would the process be?

If the case had connections to another Nordic country, how would the XX contact the authorities in that country?

Appendix 7 – Invited Public Authorities

Table 1: Invited Public Authorities

	Participating
Visa Data	
Denmark, Ministry of Foreign Affairs	
Finland, Ministry of Foreign Affairs	x
Sweden, Ministry of Foreign Affairs	-
Iceland, Ministry of Foreign Affairs	-
Norway, Ministry of Foreign Affairs	-
Investigations	
Denmark, National Centre of Investigation	x
Finland, National Bureau of Investigation	x
Sweden, National Bureau of Investigation	(x)
Iceland, National Commissioner of the Icelandic Police	(x)
Norway, National Criminal Investigation Service	x
Immigration Data (visa, residence/work permits, third country nationals)	
Denmark, Immigration Service (2)	x
Denmark, State Administration	x
Finland, Immigration Service	x
Finland, Ministry of Employment and the Economy (work permits)	x
Sweden, Migration Agency	x
Iceland, Directorate of Immigration	x
Iceland, Directorate of Labour	x
Norway, Directorate of Immigration	x
EU residence permits	
Denmark, State Administration	x
Finland, Police	(x)
Sweden, Tax Administration	x
Iceland, National Registry	-
Norway, Police	(x)
Tax Administration	
Denmark, Tax Administration	x
Finland, Tax Administration	-
Sweden, Tax Agency	x
Iceland, Directorate of Internal Revenue	-
Norway, Tax Authority	x
Workplace Inspections	
Denmark, Working Environment Authority	x
Finland, Ministry of Social Affairs and Health	x
Sweden, Work Environment Authority	-
Iceland, Directorate of Labour	x
Norway, Labour Inspection Authority	x
Victim Data (incl. social)	
Denmark, Danish Centre against Human Trafficking	x
Sweden, County Administrative Board	-
Iceland, Ministry of Welfare	x
Norway, Coordination Unit against Human Trafficking	x

Appendix 8 – Methodological Approach

A Introduction to the Methodological Approach

This appendix covers the methodological approach of the project “Exchange of Information in Cases of Trafficking in Human Beings” financed by the Nordic Council of Ministers and executed by the Danish Police Directorate, the National Centre of Investigation.

The project focuses on a cross-sector and inter-Nordic exchange of information between public authorities in potential cases of trafficking in human beings.

The purpose of the project is to develop a good practice for the exchange of information between public authorities in order to contribute to the prevention of trafficking in human beings (THB) and the prosecution of human traffickers.

This appendix seeks to uncover the flow of the project, the methodological choices and limitations concerning the results. Furthermore, a main purpose of the appendix is to add substantial transparency to the project.

A.1 Structure of the Appendix

The appendix starts by presenting the methodological framework of the project and the main empirical data in section A. In section B the main shortcomings and limitations of the project are discussed. Section C-E explain some of the core elements of the project, namely which countries and authorities participate and what is defined as trafficking in human beings related information. In section F the timeline of the project is outlined and section G presents the basic methodological entrance of the project. Section H and I present how and why questionnaires and interviews have constituted an essential element in the project and the appendix is finalized by a description of the work with the results in section J.

A.2 Social Constructivism

The project takes its outset in social constructivism and is first and foremost based on primary social research in terms of interviews.

Social constructivism makes part of the hermeneutic tradition that is actor-oriented and estimates knowledge as a product of inter-subjectivity (Van der Pilj, 2009). Actors create reality with an outset in their own interests and interpretations of reality (ibid.). Therefore, reality is in-finite and to a high degree based on the pre-assumptions of the actors (ibid.). Social constructivism becomes essential in the methodology of this project as it includes the idea that interactions can be institutionalized if enough actors share the interests upon which the interactions are based (ibid.).

It is the assumption that the public authorities invited to participate in the project process potentially THB-related information during case processing.³² The public authorities all have a politically defined interest in contributing to the action against THB. It is therefore anticipated that the participating public authorities have a common interest in strengthening the action against THB.

According to social constructivism, a shared common interest shared by enough actors can potentially result in an institutionalization of the interest. This project is, therefore, based on the assumption that the participating public authorities share a common interest in exchanging potentially THB-related information and that the good practice therefore will be broadly distributed to relevant employees accordingly.

A.3 Defining the Empirical Data

The project is inductive as it is based on the acknowledgement of the fact that a specific flow of specific information from public authorities to the police exists. This is based on the fact that police officers working within the area of THB in the National Centre of Investigation previously have received information from other public authorities for investigations. In other words, the project is based on a specific assumption about a flow and a need for that flow. Based on that assumption, the project seeks to uncover how that flow is facilitated.

The project is therefore basically exploratory, as it seeks to uncover *how* the exchange of information between public authorities and the police is taking place. This is done through the collection of data through a

³² Trafficking in Human Beings.

combination of desktop analysis, questionnaires and semi-structured individual interviews. The primary empirical data is information obtained through questionnaires and interviews.

The desktop analysis is based on academic articles, policy briefs from government institutions and European Union institutions, reports from different organizations and statistical data.

The interviews are based on questions to answers obtained via a questionnaire, asking questions to a specific topic; the exchange of information between the relevant authority that the interviewees represent and the police.

A.4 Police Angle

The project has a police angle, as the main purpose of the exchange of information is to contribute to enriching investigations and dismantle human trafficking networks. The police in all the participating countries have the legal mandate to receive information and to pass on that information to other relevant police authorities during investigations and as intelligence exchange “for police use only” (see Appendix 1). This said, the dismantling of human trafficking networks will contribute to the overall focus of the project, namely to contribute to less people becoming victims of human trafficking.

All participants from all of the public authorities stipulate that they exchange information in strict accordance with their legal mandate.

B Limitations of the Project

This section points to some of the limitations and shortcomings of the project.

B.1 Pre-assumption

The project is conducted by a Danish public authority, the police. The police are already taking part in the action against trafficking in human beings in Denmark, and it is therefore anticipated that the majority of the participating Danish public authorities have some degree of pre-assumption about the police, which could influence the result.

As the police are *the police*, it is anticipated that even those public authorities which the National Centre of Investigation has not cooperated with before have some pre-assumption about the police, and this will also have an influence on the result.

B.2 The Participants and the Results

The results of the project create an insight into the perception of a phenomenon as it is seen from the point of view of a limited number of representatives. It therefore goes without saying that the results could have been different had other representatives participated.

The answers to the questions posed in the questionnaires and during the interviews are meant to uncover how the participating representatives experience the exchange of information to the police. Therefore, the results of this project are very much depending on the representatives and their experience. E.g. a representative with less experience in working with THB cases tends to answer differently to a question than a representative with extensive experience. See section I.1 for a discussion of the different values.

As well as the results being influenced by the experience of the representatives, the results are accordingly influenced by which authority the representatives represent. The participating authorities are estimated to process information that in some way might indicate THB. The participating authorities, therefore, have a structural connection to THB, and the employees from such an authority are anticipated to give different answers than those with a social connection to THB, e.g. employees of social public organizations or health clinics.

Furthermore, the number of representatives participating influences the national results. Let us compare Sweden and Denmark to illustrate this bias: in Sweden three authorities are participating, whereas eight are participating in Denmark. Therefore, the results from Denmark are somewhat more nuanced than those from Sweden. The reason for this difference in numbers is twofold.

First, more authorities are invited to participate from Denmark than from Sweden, eight versus six. Only three of the invited authorities from Sweden chose to participate in the project, whereas all eight invitees from Denmark participated.

Second, two more authorities from Denmark than from Sweden were invited as the National Centre of Investigation already are cooperating with a number of authorities in Denmark and therefore knows exactly who to invite, which is not necessarily the case for Sweden.

Furthermore, only one representative is participating from each authority, where a more thorough result would be found if each authority was represented by more representatives and if more authorities were participating. This shortcoming is sought partly met by asking the interviewees to discuss the questionnaire with their colleagues, thereby including other departments.

B.3 Reliability and Validity

It is important to bear in mind that the results are based on qualitative interviews, making it quite difficult to state anything general about the given research area. The results are merely creating an insight into how some representatives from some authorities experience the exchange of potentially human trafficking-related information with the police. The project should, therefore, be seen as a first small insight into a rather large and somewhat uncovered area.

In this project, reliability is understood as the ability to repeat the results. More precisely, if this project was conducted again would the results be the same.

If exactly the same questions were posed to exactly the same people, the results would probably not differ too much, but would be influenced by accumulated time, and the fact that, as we move in time, we change and therefore also what we know and what we do changes. Did the project repeat itself, asking different questions to different people from different professional backgrounds, the results would possibly differ and the conclusion alike. In this assumption, another limitation of the project is hidden, namely the questions. The questions posed in the questionnaires and during the interviews are anticipated to somewhat guide the answers. Some of them even have examples of answers included in them, which also influences the results.

Therefore, the reliability in terms of replication of the results is somewhat weak, however enforced by the fact that all representatives are posed the same questions. The results are under the given circumstances estimated as being as reliable as possible. However, it must be stipulated that the purpose of this project is to share knowledge about an area and share examples of how to work with that area, without claiming that the results uncover the one and only way.

The validity represents the accountability of the results and whether the results correspond with the reality.

The results are influenced by the representatives and are, therefore, based on how the representatives experience their reality. This highly

influences the validity as the experienced reality of one employee might differ greatly from that of the next.

In order to meet this shortcoming, more representatives from each authority could be interviewed and included in the project in order to create a more nuanced picture of a common reality. In that case the answers of one could be compared with the answers of the other, in order to assure that e.g. potential discontent with the workplace would not influence the results. This is quite an essential limitation of the project that is, however, constraint by the limited time available.

The purpose of the project is, however, to share knowledge and the project is not claiming to uncover the divine reality, but merely to create an insight into a largely uncovered area. So to speak, the project uncovers what it is intended to uncover.

The limitations of the empirical data are furthermore the reason for the project to set forth a good practice rather than a best practice, as far more empirical data should be considered in order to create an analytically sound best practice.

B.4 Set Aside

Initially it was intended to create a common electronic platform for exchange of information between authorities in an inter-Nordic context. During the research it has been uncovered that the possibility to set up such a platform lays beyond the scope of this project, due to its juridical constraints.

Setting up platforms for exchange of sensitive information between countries has in other forums (e.g. Europol) turned out to be quite a challenge, as the jurisdiction in one country seldom harmonizes with the jurisdiction of the next country. As this project has shown, even the national exchange of information between authorities can turn out to be quite a challenge. It was, therefore, decided to take that part out of the project.

Another part taken out of the project is the intention to conduct focus group interviews. It was decided not to conduct these based on a number of reasons.

First, it was quite a logistic challenge to decide for the time and date for the individual interviews, and to gather all the representatives at a set time and date in direct connection to the individual interviews, therefore, seemed somewhat impossible.

Second, the representatives participating in the project are not in all cases the same as the national THB representatives of the public author-

ities. Some of these are already meeting in different forums and as this project is not aiming at dismantling a well-functioning THB cooperation in the countries by creating sub-meetings and sub-groups, it was decided not to bring the representatives together.

However, the purpose of the project is to share knowledge and create a cross-sector space for inspiration, which is estimated to be possible, all the shortcomings and limitations considered.

C Five Nordic Countries

This section argues why the five Nordic countries are participating in the project.

The five countries participating in the project are Denmark, Norway, Sweden, Finland and Iceland, constituting what is popularly known as the “Nordic countries”. The three autonomous regions of the Aaland Islands, the Faroe Islands and Greenland are due to the limited time available not included in the project. Had these autonomous regions participated, the overall results would arguably have been different, the national results, however, remain the same.

C.1 Why the Nordic Countries?

To some extent, the Nordic countries share similar social and political models, have a history of cooperation in a Nordic context and are participating in different forums of cooperation on THB (Djuve *et al.*, 2015). The countries differentiate in a number of areas, but have quite a few structural similarities, such as high standards of living, high social equality, universal welfare systems and liberal democratic political institutions (Djuve *et al.*, 2015: 9).

The European cooperation and the Schengen Area, the Nordic cooperation and the freedom of movement between the Nordic countries benefit thousands of people. According to Nordisk Ministerråd “it should be possible for private individuals and companies to move, commute, study or conduct business as freely as possible across borders in the Nordic Region”, and one of the objectives in that connection is to minimize “the impact of borders as obstacles” (Nordisk Ministerråd, 2015b).

The Nordic countries are characterized by joint labour markets, a high degree of integrated businesses and strong ties to the EU (Nordisk

Ministerråd,³³ 2015b). In the frames of the Nordic Council of Ministers, a “Freedom of Movement Council” was established in 2014, solely serving to foster freedom of movement between the Nordic countries (Nordisk Ministerråd, 2014). The Passport Union established among the Nordic countries allows for citizens of Denmark, the Faroe Islands, Sweden, Norway, Finland and Iceland to live and travel among the countries without a passport or a permit, which further eradicates control with movement (GRETA, 2011).³⁴

The Nordic cooperation is, to some extent, as the European cooperation, aiming at eliminating some of the obstacles related to border-crossings.³⁵

As not just businessmen and students travel freely across borders, but also criminals and their victims, this project seeks to uncover how public authorities in the Nordic Countries can better share potentially THB-related information nationally and inter-Nordic across borders.

D Relevant Information

This section describes how information considered relevant is defined.

The authorities participating are categorized according to the information they process (see Appendix 7).

There is quite a variation between the Nordic countries concerning which public authority has what responsibility and which legal mandate. Therefore, the project takes its outset in the relevant information and the corresponding authorities processing *that* relevant information are invited to participate in the project. This hinders the possibility for doing a comparative analysis of the results.

Relevant information is defined as information possibly processed by public authorities that in one way or the other could be related to human trafficking, either victims or perpetrators or is differing from the standard in such a degree that it seems suspicious.³⁶ The information should be of such a character that it in one way or the other could enrich potential investigations carried out by the police within human trafficking.

What constitutes relevant information is defined in cooperation with police officers from the National Centre of Investigation (DK) hav-

³³ As EU member states or EEA member states.

³⁴ Situations of emergency exempt.

³⁵ Situations of emergency exempt.

³⁶ E.g. when the purpose of a stay in the receiving country is disproportional to the socio-economic situation of the applicant in the home country.

ing several years of professional experience with human trafficking investigations.

In the global and European action against human trafficking there is an increasing focus on other forms of exploitation than sexual and this project follows that new focus. The chosen outset for relevant information is, therefore, workplace inspections. During workplace inspections, a number of public authorities are participating. Which authority participates with what responsibility differs between the Nordic countries, so the definition of relevant information takes its outset in a Danish workplace inspection. In such an inspection the working environment authorities participate and also the Immigration Service, the Tax Administration and the police.

The information controlled during an inspection is e.g. personal identification documents, work permits and tax registrations. In Denmark authorities processing relevant documents are the Working Environment Authority, the Immigration Service, the Ministry of Foreign Affairs (the embassies), the State Administration, the police and the Tax Administration. As a significant number of the victims of human trafficking in a European context are EU citizens, the authorities responsible for registering EU citizens after three months are, to the extent possible, also included in the project.

Accordingly, the definition of what constitutes relevant information is quite broad, which hinders the possibility for doing a comparative analysis. The broad definition, however, leaves the possibility of defining what constitutes relevant information to the participants and is, therefore, in this context, applied as a methodological tool for pointing out the relevant participants.

E Relevant Public Authorities

This section describes the process of locating the relevant public authorities for the project.

Public authorities are defined as public institutions working under the legal mandate of the government. The relevant authorities are those who process information that in some way could be related to THB. First and foremost, the public institutions processing documents of third country nationals and other EU country residents as these constitute the statistically most common victims of THB.

Previous investigations in Denmark have shown that the authorities mentioned in the previous section are the authorities that most often

contribute with information to the police concerning human trafficking. Therefore, authorities with similar areas of responsibility in the other Nordic countries are invited to participate in the project.³⁷

In cases where a public authority has the responsibility for collecting data on or identifying victims, that authority is also invited to participate in the project.

It is important to stress that workplace inspections contribute to defining the relevant authorities and is the primary focus of the interviews and the questionnaires. However, if some of the participating public authorities choose a broader focus on potentially human trafficking-related information, this is included as well.

In some of the participating countries a national coordinator is appointed. As the purpose of the project is to gain insight into how the exchange of information is proceeding according to the caseworkers, these coordinators are initially not invited to contribute.

During the project, some of the coordinators themselves offered to meet with the National Centre of Investigation (DK) between the interviews and therefore contributed with a presentation of their work. These meetings were prioritized and arranged for, where possible.

As there is a considerable difference in the legal mandate and areas of responsibility between the participating authorities, it is not possible to do a comparative analysis of the countries or the results. Furthermore, the authorities participating from one country are not necessarily the ones participating from the other, and the representative from one authority might have a long professional experience as a case worker where the representative from another might be a newly appointed national coordinator. Therefore, the purpose of the project is not to do a comparative analysis or even a best practice, but to share good practices.

As goes for any other research, it also goes for this project that when some participants are pointed out as relevant, others are indirectly characterized as irrelevant. It should, therefore, be stipulated that any authority could be relevant in the action against THB, and that the pointing out of relevant authorities is merely a way of defining who should participate in the project, acknowledging that other authorities not participating might be just as or even more relevant.

³⁷ Appendix 7 illustrates which authorities have been invited, based on exactly what type of information they process.

E.1 Police

In cases where the authorities might have a human trafficking suspicion, either during a control or during the processing of applications or similar, the police are to be contacted. Therefore, the police become the centre to which all potentially human trafficking-related information is directed. Furthermore, the police have the legal mandate to ask for additional information from other relevant public authorities and to share any information with other Nordic police authorities during criminal investigations.

However, the police service is quite a broad institution and therefore even locating the right representative from the police influences the results of the project. The representatives pointed out within the police authorities only represent one perception of the research area, where other departments and employees would represent different perceptions. The representatives from the police authorities are mostly national coordinators; where the results could have been extensively different had representatives from local level participated.

E.2 Civil Society and NGOs

Moreover, it goes without saying, that the many non-governmental organizations and other public organizations as well play a great role in contributing to investigations and to victim protection. However, only a limited number of public authorities are included in the project.

This because the focus of the project partly is to contribute to the attention of the public authorities towards trafficking in human beings, meanwhile contributing to a broader focus and uncover relevant information of the public authorities in relation to victims of all kinds of exploitation. Therefore, the project focuses on the relevant information solely processed by the public authorities and how the authorities could potentially enrich ongoing and upcoming investigations against criminal networks.

F Timeline of the Project

This section presents the main timeline of the project.

The project is carried out across five Nordic countries and is conducted in a period of 12 months from the 1st June 2015 to the 1st June 2016.

The desktop analysis is primarily conducted in June, July and August 2015. During this period, the project looks into trafficking in human be-

ings as a crime and the public structural framework in each participating country in order to map and select the most relevant public authorities for the project. Furthermore, during this period, the selected public authorities are invited to participate in the project and the questionnaires and the cases and the interview-guide for the interviews are developed.

From September 2015 to February 2016 the interviews are conducted. The interviews are face-to-face interviews, carried out by one interviewer in five different rounds, one for each participating country.

The interviews in Iceland are conducted over a period of two days. Originally, seven public authorities are invited to participate in the project. Each participating authority points out a contact person, representing the authority. The initial invitations are sent out in June and the interviews take place in October.

Representatives participate from the Directorate of Labour, the Directorate of Immigration, the Reykjavik Metropolitan Police and the Ministry of Welfare. A total of six interviewees contribute to the result from Iceland.

In Finland the interviews are conducted throughout two days in November. Originally, six public authorities are invited to participate in the project. The initial invitations are sent out in June.

Representatives participate from the Ministry of Employment and the Economy, the Occupational Safety and Health, the Immigration Service, the National Bureau of Investigation and the Ministry of Foreign Affairs. In total, seven interviewees contribute to the result from Finland.

In Denmark the interviews are conducted over a period of three weeks in September, except from one taking place in October. Originally, eight public authorities are invited to participate in the project. The invitations are sent out in June.

Representatives participate from the Danish Working Environment Authority, the Danish Centre against Human Trafficking, the State Administration, the Danish Agency for International Recruitment and Integration, the Tax Administration, the Visa Office/Immigration Service, the Citizen Service, Visa and Passport/Ministry of Foreign Affairs and the National Centre of Investigation. A total of fourteen interviewees contribute to the result from Denmark.

The interviews and the questionnaires for the Danish authorities are in Danish and therefore the results are translated into English for the main report.

In Norway the interviews are conducted throughout three days in December. Originally, six authorities are invited to participate in the project. The invitations are sent out in June.

Representatives participate from the National Criminal Investigation Service, the Labour Inspection Authority, the Coordinating Unit for Victims of Trafficking, the Tax Authority and the Directorate of Immigration. A total of five interviewees contribute to the result from Norway.

In Sweden the interviews are conducted over a period of two days in January. Originally, six public authorities are invited to participate in the project. The invitations are sent out in June.

Representatives participate from the Migration Agency, the Tax Agency and the police. A total of three interviewees contribute to the result from Sweden.

G Basic Methodological Entrance

As an initial step of the project, the relevant authorities are identified and invited to participate in the project.

The invitation asks the relevant authority to point out an employee “who works with information that in some way might be related to trafficking in human beings”.

A gate-keeper approach is applied as it is estimated to be essential for the results of the project that the participation is approved at a central level in the public authority. This to assure that the participating employee is mandated to answer on behalf of the corresponding authority and that the results are distributed to relevant employees. This means that the National Centre of Investigation (DK) has no influence on which representatives are appointed to participate in the project.

This approach is quite essential for the research design and is also influencing the results substantially. Had another employee emptied the main inbox of the participating authority that day the invitation was sent, the invitation would maybe have found another way through the system and reached another department and another employee with different answers.

Using the gate-keeper approach influences the results as the person reading the invitation actually becomes crucial for the results. The internal procedure in each authority concerning incoming mail hereby affects who becomes appointed for participating in the project. The representative appointed might therefore not be the most relevant for the project or the most knowledgeable concerning THB. However, one of the cornerstones of the project is that the results can be shared afterwards and it is therefore considered crucial that the participation in the project is approved by the participating authorities.

As stated above, an important part of the project is to enhance focus on trafficking in human beings, and it is therefore important that the implicated public authorities know that they are participating and are aware of the fact that a good practice will come out for distribution to relevant employees. It is estimated that the best way of assuring that the participation in the project is approved at a high enough level is by contacting the public authority through official channels.

Thirty-five different public authorities across the five countries are invited to participate in the project.

Out of them twenty-five confirmed that they could participate with a representative in the project. Of the ten not participating, some declined and some never answered. Those who did not answer were contacted again.

The appointed representatives from each authority are contacted first by e-mail, then by phone in order to make sure that they are in fact able to contribute to the project concerning the relevant topic.

Some of these e-mails and phone calls resulted in new representatives being appointed.

H Questionnaires

This section describes the circumstances and considerations decisive for the questionnaires.

When the participating representatives are located and identified by e-mail and phone, they receive a questionnaire with between eight to nine questions.

With the questionnaire follows an instruction informing the representatives of the purpose of the questionnaire and asking them to discuss the questionnaire with relevant colleagues. The instruction further informs the representative about the anticipated result and about their role in the project (see Appendix 2 and 3).

The questionnaire aims at assuring that the right representative is pointed out for the project; that the representative has the opportunity to research on difficult questions; that the representative has the opportunity to discuss the questionnaire with relevant colleagues and that the representative has the possibility of preparing for the topic of the interview.

Each representative has approximately four weeks to fill out the questionnaire and return it to the National Centre of Investigation (DK). The interviews are, to the extent possible, conducted one-two weeks after the return of the questionnaire.

The receiving of the questionnaire for some public authorities resulted in the appointment of yet a new representative.

When filling out the questionnaire, the interviewees are directly asked to base the answers on their own experience and, to the extent possible, on the experience of their colleagues, involving more departments within the same authority in the project.

A questionnaire is made specifically for each sector: one for the immigration authorities, one for the police authorities, one for the tax authorities, etc. The questionnaires are edited, so that they correspond with the information processed by each participating authority. The homepage of each authority is researched for this purpose. This research design is influencing the result as the questions to some degree guide the answers.

The questionnaire is sent out in a word format so that the representative does not have to face the limited time factor of an online questionnaire.

The chosen word format of the questionnaire underscores the personal space, which is also one of the main reasons for not just sending out questionnaires, but to also conduct interviews, namely to gain insight into experienced knowledge rather than official knowledge, best done in a semi-personal space.

As the questionnaires are returned, a case is sent to each representative as preparation for the interview (see Appendix 4 and 5).

The case is to be discussed during the interviews and highlights the emerging focus on trafficking for forced labour and other exploitation, being based on previous trafficking cases from Denmark. The cases further underscore the relevance of the project, being cases where exchange of information from public authorities to the police has been decisive for an investigation.

The questionnaire is retrospective seeking to uncover how the current exchange of information is, whereas the interviews are both retrospective and to some degree prospective giving the representative the possibility to come up with initiatives that could enhance the current exchange.

H.1 Questions

In the following, the intention of each question in the questionnaires will shortly be explained (see Appendix 2 and 3). When different questions are posed to the police, these are listed and their purpose explained.

The questions in the questionnaire are made in cooperation with Danish police officers with extensive experience from investigating trafficking in human beings.

The questionnaire is based on mostly open and a few closed questions. The open questions create a more profound insight into the area of research.

The questions seek to create an insight into the action against THB in that public authority, the degree of exchange of information with other public authorities and the police, challenges characterizing the exchange of information and the degree of exchange of information across Nordic borders.

The questions, therefore, seek to uncover *if* there is a need for exchanging information to the police concerning THB nationally and inter-Nordic and to find out *how* the exchange is facilitated. The police are additionally questioned about their possibility for exchanging information across borders, in an inter-Nordic context.

Background information about you and your answers.

Professional title and department/ Short description of your experience within the field of trafficking in human beings/ From which departments within the XX,³⁸ did you receive information for answering this questionnaire:

The intention of this question is to understand the professional context of the answers and gain an insight into how much attention is divided to trafficking in human beings within that public authority.

Which information is handled by the XX during the YY that might be relevant for the police in order to uncover modus and trends within trafficking in human beings? (...)³⁹

The intention of this question is to make sure that the interviewee is aware of which information the authority processes that could potentially be related to human trafficking. The answer to this question is quoted in the main report in order to knowledge-share between the public authorities concerning potentially human trafficking-related information.

The question should also add to the awareness about human trafficking in the department of the interviewee and in the departments from which information is gathered.

A number of suggestions is listed behind the question in brackets in order for the interviewee to be lead in the right direction and to show

³⁸ The relevant authority.

³⁹ Relevant case processing, e.g. "processing of visas" or "workplace inspections".

that the National Centre of Investigation (DK) has done some research and is interested in that specific public authority.

Corresponding question to the police: *Which information from other authorities could be relevant for the police in order to uncover current modus and trends within human trafficking?*

The intention of this question is to be able to inform other public authorities about which information is relevant for the police in order to start investigations and uncover modus and trends within human trafficking.

Furthermore, the question should create an opportunity for the interviewee to define what kind of information is essential in terms of information from other public authorities. These answers are also presented in the main report.

Are any employees or departments in the XX responsible for screening cases and applications for information related to human trafficking?

The intention of this question is to share knowledge between the participating authorities. If one of the participating authorities is taking specific precautions in relation to human trafficking, it creates the possibility for others to be inspired for doing the same.

How many/which human trafficking-related cases/information has the XX exchanged with the police within the last five years?

The intention of this question is to gain a more profound insight into the type of information exchanged. The giving of a five year period is a way of assuring that former cases are looked for in the system. Had the question been without a time period, the answer would presumably be based on if anyone could *remember* any cases. The time period should send the interviewee to the archive.

Corresponding question to the police: *How many/which human trafficking-related cases/information have the police received from other authorities within the last five years?*

The intention of this question is to uncover the relevance of the project by gaining a profound insight into the exact cases and information related to human trafficking enriched by other public authorities.

Whereto in the police has this information been directed?

The intention of this question is to follow the flow of information and potentially detect where the flow flows easily and where it does not. The intention is also to find out if the flow of information is based on a structural framework or on a personal network. Moreover, the intention is to be able to describe how information is shared.

Corresponding question to the police: *Where in the police should other authorities go to with human trafficking-related information in order to*

assure the best possible exchange of information and, if needed, exchange to other relevant authorities?

The intention of the question is to uncover if the current flow of information is sent in the right direction or if the other public authorities need to know more exactly where to send trafficking related information.

Has the XX previously experienced any challenges in relation to the exchange of human trafficking-related information with the police?

The intention of this question is to shed some light on potential challenges, as the awareness of challenges could lead to initiatives to meet or eradicate these challenges.

Has the XX previously experienced any need for exchanging human trafficking-related information with other national authorities, and, if yes, how is this exchange facilitated?

The intention of this question is to find out whether the representatives experience a need to exchange information related to human trafficking to other national authorities.

Has the XX previously experienced any need for exchanging human trafficking-related information with other Nordic authorities, and, if yes, how is this exchange facilitated?*

The purpose of this question is to find out whether the participating public authorities experience a need for exchanging THB related information across Nordic borders, and, if so, how it is done.

A question only posed to the police: *Could the police facilitate the exchange of information on new modus and trends to other Nordic police authorities, and could these facilitate the distribution of this information to other national authorities in their country?*

The intention of this question is to uncover whether the police could be the epicentre of information.

How would you be able to distribute the results of this project to other relevant departments within the XX?

The main purpose of the project is to distribute a good practice to relevant employees and departments within the participating public authorities, and it is therefore quite essential that the representatives are willing to be responsible for this distribution. The intention of the question is, therefore, to make sure that the representative is aware of this and has thought about how and to whom the good practice should be distributed.

When the questionnaires are returned, individual interview guides are created for each interview with an outset in the answers in the questionnaire (see Appendix 6).

Some questionnaires were returned with long written answers, whereas others were quite short. The interview, therefore, constituted a most needed opportunity for elaborating on the answers given. The interview proved quite relevant as significant more information was given during the interviews than in the questionnaires.

All representatives confirmed during the interviews that they were willing to distribute the good practice to relevant colleagues.

I Interviews

This section describes the circumstances and considerations decisive for the interviews.

There are two main reasons for choosing interviews as the primary empirical data for this project.

First, the project does not focus on uncovering juridical processes, but experienced processes best uncovered in the field.

Second, the aim of the project is to create an opportunity for knowledge-sharing between public authorities. It is estimated that the best way doing this is by uncovering the experienced processes rather than the strategic. Strategic processes are detectable through readings, whereas interviews are necessary in order to uncover experienced processes. The project through the interviews aims at sharing knowledge between public authorities that they cannot obtain through readings of reports, action plans or jurisdiction.

Furthermore, the interviews serve as part of the aim themselves, as they may contribute to awareness-raising and thereby contribute to a broader consideration of information and the acknowledging of the fact that information, not directly connected to THB, could potentially be important to the police in the action against THB.

The interviews are semi-structured qualitative expert interviews and simple and direct questions are posed in order to get complex answers, creating the opportunity for revealing and understanding specific ways-of-conduct (Trost & Jeremiassen, 2010: 25–33).

1.1 Values

The interviews are conducted under the influence of a number of different values (Trost & Jeremiassen, 2010: 29–44). Values as nationality, age, sex, profession, legal mandate and area of responsibility differ from interviewee to interviewee.

The nationality of the interviewees influences the results as the focus on THB, tradition and cultural perception of THB in their country will influence their knowledge about and involvement in the action against THB.

The age of the representatives is anticipated to influence their experience, both within their specific profession, but also in relation to insight into formal procedures and former cases.

The profession of the representatives influences the results, as the answers given by a legal specialist employee are anticipated to differ from those given by a social specialist employee.

One of the main differentiating values of the project is that the representatives are working in the framework of different legal systems, and the legal mandate for the exchange of information, therefore, differs from country to country, even from authority to authority.

Another differentiating value is the structural, as some countries have had more political focus on the action against THB than others. Therefore, in some countries an institutionalized structure of meetings and forums concerning THB is already in place, whereas it might be absent in others. The existence or absence of these structures will have an impact on the exchange of information.

Furthermore, some public authorities cooperate with the police concerning other crime areas and therefore already have an institutionalized exchange of information, convertible to the area of THB.

1.2 Space and Place

The interviews are conducted as face-to-face interviews.

The purpose of conducting face-to-face interviews is to create a personal contact with the representatives who at a later stage will function as ambassadors for the project when distributing the good practice.

Furthermore, it is anticipated that the answers given about the exchange of information are more detailed and nuanced when given face-to-face, than when given e.g. via Skype, as the physical presence of the interviewer creates a serious and semi-personal space.⁴⁰

The face-to-face interview makes it easier to deal with interferences as disruptions and common misunderstandings. The majority of the interviews are conducted in English, and the face-to-face interview creates the focus necessary for expressing oneself in a foreign language.

⁴⁰ The psychological circumstances.

The place for the interview is in all cases an official facility,⁴¹ chosen by each interviewee individually. The official facility is a symbol of professionalism and locating the interview at the workplace underscores the role of the interviewee as representing the workplace. Furthermore, this assures that the interview is conducted in a somewhat safe and known space and place for the interviewee. Two factors that are estimated as having a positive impact on the interview.

The interviews are audio-recorded with the written consent of all the interviewees, and each interview is summarized in a written format that will not be published.

The interviews last approximately one hour and at the majority of the interviews only one interviewee is present. In others, up to five interviewees are present.

1.3 Interviewees/Representatives

During the interview, the interviewee is the centre of attention, as the purpose of the interview is to find out *how* rather than *why* (Trost & Jeremiassen, 2010: 57–59).

The interviewees include consular officials, administrative officers, social workers, labour inspectors, police officers, senior and special advisers, visa officers and lawyers. The professional title of the interviewees are not included in the report as that for some would create problems of anonymity.

All the interviews are initiated by informing the interviewee about the purpose of the project and a mutual presentation of interviewer and interviewee. Furthermore, the representative is informed about how the interview will be conducted and how the results will be used and presented.

In all the interviews the interview-guide follows the same structure. An opening question is posed at the very beginning of each interview asking “*How is your area of work connected to trafficking in human beings?*”. Hereafter questions are asked to the answers given in the questionnaire in order to rid any misunderstandings and to gain a more profound insight into the core of the project. In conclusion, the interviewees are asked some more overall questions and the case is discussed.

The date and details of the interviews are planned either by phone or by e-mail in order to assure that the right representatives are pointed out.

All the interviewees are informed about their partial anonymity. All interviewees are asked whether they permit that their contact details

⁴¹ The physiological circumstances.

are shared for evaluation purposes. The identities of the interviewees are not stated in the main report, but is known to the National Centre of Investigation (DK).

Every demand or request made by the interviewees are met. Cancellation of interviews, postponing of deadlines, appointment of extra or new interviewees, proofreading, change of dates and similar. This in order for the interviewees to be aware of their essential role in the project.

All participants are given the possibility to read through, make adjustments and approve their contributions to the project.

J Results

This section describes the method applied when analyzing the results from the interviews.

After each interview the audio is listened to carefully and notes are taken coherent to all relevant content, bearing the purpose of the project in mind.

Only the interviewer listens to the audio-recording and makes notes, which has the advantage of creating an opportunity for reading what is said between the lines, but the disadvantage of only one person actually filtering what should be included and what should not.

In average 4–5 pages of notes are taken coherent to each interview. The report is not containing any direct quotes, but is referring to what have been said by the interviewee during the interview. In order to assure that the interviewees recognize themselves in the results, they are presented with the possibility for reading through, commenting and making changes in the written result.

Hereafter a number of codes (subjects/headlines) are made in order to be able to answer the research questions. Coding could have the effect that other potentially relevant data could be neglected; it does, however, have the huge advantage of providing the interviewer with the possibility to break down a large data set into smaller pieces. The codes are: exchange of information to other authorities/ contact to the police/ good examples according to the representative/ challenges according to the representative/ recommendations according to the representative/ internal processes with focus on trafficking in human beings/ legal mandate for exchange of information to the police/ groups and meetings/ and a sum up with three sub dimensions: Nordic dimension, police contact and good practices. Each code has two dimensions: a Nordic and a national.

The notes from each interview are screened for information relevant to the set-codes. Furthermore, each questionnaire is read through in order to search for any potentially relevant additional information.

Hereafter, a new set of codes are made for the main report. These codes are: information relevant to the police/ potential THB information/ exchange of information/ from public authorities to the police/ internal organization concerning THB/ highlights/ challenges/ potentials.

The results of the project in the main report is publically available on the webpage of the Nordic Council of Ministers. The report includes the good practice distributed to the participating public authorities. The good practice and the report is sent directly to the representatives for them to distribute it to relevant colleagues.

Throughout the project all expenses, budgets, e-mails, writings, results and doings are documented and saved, should anyone be interested in getting a more thorough insight into the work process of the National Centre of Investigation (DK) during the project.

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Exchange of Information in Cases of Trafficking in Human Beings

This report covers the findings of a project that uncovers which potentially human trafficking-related information is processed by a number of public authorities across five Nordic countries in their daily case processing and how this information is exchanged between the participating public authorities and the police. Based on this, a short good practice guide is developed and distributed to relevant public authorities.

The report concludes that three cornerstones are essential in order to exchange information concerning trafficking in human beings: training and education in the indicators of trafficking in human beings, clear channels of communication between the public authorities and the police, and organizational priority towards trafficking within each public authority and police authority.

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