



Organization for Security and Co-operation in Europe

Special Representative and Co-ordinator for Combating Trafficking in Human Beings

Foreword

On 5-9 September 2022, I had the pleasure of paying an official visit to Norway to hold consultations with high-level government officials, law-enforcement, and the judiciary, as well as representatives of civil society involved in the field of anti-trafficking.

The objectives of the visit were to identify promising practices for combating trafficking in human beings (THB) as well as to promote the full implementation of OSCE commitments in the field of anti-trafficking, notably holistic and comprehensive actions aiming to better prevent and respond to human trafficking and to protect and support its victims. I greatly appreciated the constructive discussions held and I was pleased to observe the commitment of practitioners to further anti-trafficking responses in the country.

The Report was presented to the Delegation of Norway on 23 February 2023. The Government submitted its final comments for internal review on 30 March 2023.

Norway exhibits a promising example to prevent and tackle labour trafficking and labour-related crimes. These efforts are reflected in its recent Transparency Act, institutional and multi-agency structures, and policy documents that are geared towards promotion of due diligence and respect of human rights, particularly within businesses. I am pleased to note that, since the visit, Norway established a new centre for co-operation on labour related issues in Alta and Finnmark, which will further advance the country's efforts. The swift actions taken to protect Ukrainians seeking refuge from the war and sensitize all front line agencies and institutions to prevent any imminent trafficking risks are among other noteworthy examples. Nonetheless, a renewed strategic guidance and co-ordination are necessary to connect, align and scale up actions to prevent and combat all forms of trafficking. This also entails improving data collection mechanisms to inform the policies and encourage tailored actions. Norwegian criminal justice practitioners and the judiciary also need to take concerted efforts to ensure trafficking offenders are effectively prosecuted and sentences imposed are commensurate with the gravity of the crime.

By encouraging relevant authorities to implement the comprehensive set of recommendations made in this report, I look forward to deepening our established collaboration and to furthering our future co-operation in the best interests of the most vulnerable and disadvantaged members of society.

A handwritten signature in blue ink, appearing to read 'Valiant Richey'.

Valiant Richey

Special Representative and Co-ordinator for Combating Trafficking in Human Beings

**Report by the OSCE Special Representative and Co-ordinator for Combating
Trafficking in Human Beings, Valiant Richey following the country visit to
Norway
5-9 September 2022¹**

Summary:

The OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings, Valiant Richey, conducted an official visit to Norway from 5 to 9 September 2022 to assess the country's anti-trafficking laws, policies and practices. During the visit, special attention was paid toward national efforts to coordinate anti-trafficking measures, prevent human trafficking, protect the rights of and provide assistance to trafficked persons, and prosecute perpetrators in line with OSCE commitments and relevant international standards.

The Special Representative positively notes the initiatives and approaches taken by Norway in preventing and combating labour exploitation through adoption of laws and policies and establishing institutional structures. For example, Norway provides a composed and comprehensive model response to mandatory due diligence measures in businesses through recent adoption of the Transparency Act. Likewise, by bringing together diverse stakeholders under one umbrella institution - called A-Krim Centre - to identify and address labour-related crimes including those committed with trafficking elements, the country provides a good practice of participatory and empowering multi-agency response to tackle labour exploitation. A proactive approach of the financial intelligence unit (FIU) to identify and investigate financial flows deriving from various forms of human trafficking is a promising development that should be advanced and leveraged through wider partnerships. Recent years also saw the Norwegian judiciary adjudicating complex cases of human trafficking and reaching convictions for trafficking offenders.

The Special Representative also wishes to share several key opportunities and concerns with regard to specific actions and challenges in the country's anti-trafficking response both in terms of policy development and implementation of practical measures. The lack of the action to update or develop a new plan of action to prevent and tackle existing and emerging forms of trafficking as well as strategically address priority areas is a significant gap in Norway's anti-trafficking architecture. The number and diverse nature of relevant policies and structures in the anti-trafficking arena, coupled with the evolving nature of the trafficking crime, requires a more active, robust and higher-level

¹ The Report was finalized on 23 February 2023

coordination mechanism across the entire Government than the current system of inter-agency working group and de facto national coordinator. The appointment of an independent National Rapporteur to assess and evaluate anti-trafficking action in the country would also resolve the country's continuous challenges in collecting and maintaining trafficking related data and address the gap in monitoring and evaluation of the efficacy of anti-trafficking policies and practices in the country. In sum, these aspects reflect a need for substantively enhanced political will and attention to ensure that anti-trafficking efforts remain high on the country's agenda.

The authorities acknowledge that much work also remains to be done in terms of identifying various forms of trafficking particularly for sexual exploitation and trafficking in children which are increasingly facilitated through technology. The Special Representative urges relevant authorities to continue working towards implementing criminal law provisions related to tackling the demand that fosters sexual exploitation and preventing trafficking among persons in prostitution. With regard to protection efforts, while victims are reportedly being served, some services such as healthcare and immediate psychological assistance are difficult to access and need urgent attention by the government. In this regard, and in the absence of the National Referral Mechanism, assigning the function of coordination of assistance measures to a single body/agency would contribute to an improved and effective protection scheme.

In the area of investigation and prosecution, while positively noting the establishment of specialized anti-trafficking police units, he expresses concern on the decline of criminal justice efforts, the lack of proactive efforts to investigate various forms of trafficking including online, the requalification of trafficking cases to crimes carrying lenient penalties such as pimping and social dumping, which fails to capture the serious and exploitative nature of the criminal conduct.

Below, the Special Representative makes several concrete recommendations to enhance Norway's response, including development and adoption of the new National Anti-Trafficking Action Plan (NAP) and elevation of the coordination to higher level government structure; setting up a coordination mechanism for identification and assistance of trafficking persons; improving identification of victims of all forms of trafficking; tackling the demand that fosters all forms of trafficking, with particular focus to effectively applying laws related to discouraging demand for sexual exploitation; and boosting proactive investigation and prosecution of all forms of trafficking.

I. Introduction

1. This Report presents the central findings and recommendations of OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings, Valiant Richey, (hereinafter referred to as the Special Representative) following his country visit to Norway on 5-9 September 2022.²

² The Special Representative was accompanied by the Senior Advisor, Julia Schellhaas and Associate Country Visit Officer, Tarana Baghirova

2. The purpose of the visit was to hold consultations with government officials and experts from state institutions and civil society to learn of promising practices as well as to support and advance ongoing efforts to prevent trafficking, assist trafficked persons and protect their rights, and bring perpetrators to justice in line with OSCE commitments and relevant international standards.
3. In the course of the visit, the Special Representative engaged in direct consultations with government officials, including Norway's National Anti-Trafficking Co-ordinator Jan Austad; the Co-ordinating Unit for Victims of Human Trafficking (KOM); the Ministry of Justice and Public Security; the Norwegian Directorate of Immigration; the Ministry of Labour and Social Inclusion; the Directorate of Labour and Welfare Administration; Human Trafficking Support Oslo (HTSO); the Ministry of Health and Care Services; the Ministry of Children and Families; Oslo Child Welfare Service; the Norwegian Directorate for Children, Youth and Family Affairs (Bufdir); Judges of the Borgarting Court of Appeal; National Authority for Investigating and Prosecution of Economic and Environmental Crime (Økokrim) – the Financial Intelligence Unit (FIU); the Children's House; National Police Directorate; Inter-agency centre (A-Krim centre) for combating labour exploitation; Oslo police department; National Police Immigration Service (PU); the National Criminal Investigation Service (KRIPOS); the Labour Inspection; Director of Public Prosecutions; Oslo Regional Prosecution Office; the Ministry of Foreign Affairs; the Ministry of Children Families; Amnesty Norway; and members of the Parliament. In line with established practice, the Special Representative concluded the visit with the briefing to the members of the Inter-Ministerial Working Group.

The Special Representative also held consultations with anti-trafficking NGOs, including NGO ROSA, Marita Women, Caritas, Salvation Army, Pro Sentret and NGO REFORM- Resource Centre for Men.

4. The Special Representative wishes to thank the Norwegian authorities, and in particular, the Norway's National Anti-Trafficking Co-ordinator Jan Austad and the Ministry of Justice and Public Security for the co-operation and assistance in organizing and facilitating the visit. He also wishes to thank all interlocutors, including civil society organizations in Norway, for their willingness to share their knowledge and insights.
5. Consultations during the visit focused on the situation of trafficking in human beings (THB) in the country and the ongoing policy, legislative, and operational responses to it. More specifically, discussions focused on co-ordination, monitoring and evaluation of anti-trafficking measures, the identification of, and provision of assistance to, victims of all forms of trafficking, particularly child victims of trafficking; the protection of victims' rights, including of migrant workers and asylum seekers; efforts in the area of prevention and countering the demand that fosters sexual and labour exploitation; co-operation with civil society and partnerships with public and private entities; and prosecutions and convictions of perpetrators.
6. Over the course of the visit, the Special Representative noted with appreciation that government officials and civil society representatives demonstrated significant awareness and understanding of human trafficking as a serious violation of fundamental rights, knowledge of new human trafficking trends in the country, and a

readiness to tackle new threats. He also commends Norway's consistent efforts to contribute to the advancement of the global anti-trafficking agenda through innovative and ground-breaking legislation as well as leadership and investment in multi-lateral anti-trafficking efforts.

7. The Special Representative stressed the importance of ensuring the high political profile of the anti-trafficking agenda, of maintaining the prevention of THB a key government priority, and of the need to maintain vigilance on issues of domestic exploitation. He notes that a decline in high-level attention to the problem could jeopardize the important results already achieved.

II. Legal framework

8. The Special Representative commends Norway for being a party to major international instruments in the fight against trafficking in human beings, such as the United Nations Convention against Transnational Organized Crime and its Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children ("Palermo Protocol"), ratified on 23 September 2003, and the Council of Europe Convention on Action against Trafficking in Human Beings, ratified on 17 January 2008.

The country has also ratified a number of Conventions addressing slavery and forced labour such as the ILO Forced Labour Convention No.29 and its Protocol of 2014 ratified in 1932 and 2015, respectively; the ILO Convention on the Abolition of Forced Labour No.105, ratified in 1958; the ILO Convention on Worst Forms of Child Labour No.182, ratified in 1999; the ILO Domestic Workers Convention No. 189 in 2021 and the UN Convention on the Elimination of All Forms of Discrimination against Women in 1981.

Norway ratified the UN Convention on the Rights of the Child in 1991. The Optional Protocol on the involvement of children in armed conflict and on the Sale of Children, Child Prostitution and Child Pornography, were ratified in 2003 and in 2001, respectively.

9. The Special Representative further recommends that Norway sign and ratify the International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families. The ratification of this Convention is of particular importance to enhance protection mechanisms in the context of mixed migration flows.
10. As a participating State to the OSCE, Norway has also pledged to implement the commitments it has undertaken in the OSCE framework, in particular the recommendations contained in the 2003 Action Plan to Combat Trafficking in Human Beings, as well as its 2005³ and 2013⁴ Addendums.

³ OSCE Permanent Council Decision No. 685 [Addendum to the OSCE Action Plan to Combat Trafficking in Human Beings: Addressing the Special needs of Child Victim of Trafficking for Protection and Assistance](#), PC.DEC/685

⁴ No.1107 [Addendum to the OSCE Action Plan to Combat Trafficking in Human Beings: One Decade Later](#), PC.DEC/1107/Corr.11

11. Domestically, human trafficking is defined in Sections 257 and 258 of the Norway's Criminal Code (CC). The provision was subject to several amendments since 2005 leading to stronger penalties for trafficking perpetrators, expanding and adding aggravated forms of human trafficking. Section 257 contains a list of exploitative purposes including prostitution or other sexual services; forced labour or services, including begging; active military service in a foreign country and consenting to the removal of the person's organs. These forms are punishable by six years of imprisonment. Pursuant to Section 258, aggravated human trafficking is punishable by imprisonment for a term not exceeding 10 years and its determination is linked to whether the person subjected to the act was under 18 years of age, whether severe violence or force was used, and whether the act generated significant proceeds.
12. CC Section 259 criminalizes slavery by imprisonment for a term not exceeding 21 years. The same penalty shall apply to any person who engages in slave trading or the transport of slaves or persons destined for slave trading. The conspiracy to engage in slavery is criminalized through Section 260 for a term not exceeding 10 years.
13. Norway's CC criminalizes the purchase of sexual services from adults (Section 316) and children (Section 309) prescribing a penalty of a fine or imprisonment for a term not exceeding six months or both in case of adult, and a penalty of a fine or imprisonment for a term not exceeding two years in cases when the crime is committed against a minor. Sections 302 to 304 criminalize sexual and aggravated sexual activities with children between 14 and 16 years and sexual act with a child under 16 years of age prescribing a prison sentence for a term not exceeding six years and a prison sentence for a term not exceeding 15 years in cases of aggravated sexual activity (Section 303). Section 315 criminalizes controlling and facilitating prostitution (pimping) with a penalty of a fine or imprisonment for a term not exceeding six years. Section 317 criminalizes publishing, selling or in any other way attempts to disseminate pornography.
14. Norwegian law does not include an explicit reference to the *irrelevance of consent* of the victim to the intended exploitation. However providing payment or any other advantage to obtain consent for such a course of action from a person who has authority over the aggrieved person or who received such payment or advantage is penalized under Section 257 (Human Trafficking). The issue of consent has come up in several discussions particularly related to cases of trafficking for exploitation in criminal activities, such as during the adjudication of the case in the context of terrorist activities and cases related to drugs. While the absence of this principle in the law does not seem to create significant issues, its relationship to the application of the non-punishment principle - particularly the timing of the consent and its significance for criminal liability and to the means used for its vitiation - are important aspects to be taken into account both by law enforcement agencies and the judiciary. To this end, the Special Representative recommends that Norwegian authorities include an explicit reference to the irrelevance of a victim's consent to the intended exploitation in the legal framework in line with international instruments and develop targeted capacity building activities for all criminal justice professionals and all agencies that have the mandate to identify trafficking victims.
15. In 2022, Norway adopted the Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act). The

purpose of the Act is to promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services, and to ensure public access to information regarding how enterprises address adverse impacts on fundamental human rights and decent working conditions (see paragraph 54 for further details). The Special Representative commends Norway for adoption of this law which serves as a good practice for other OSCE participating States.

16. Victim identification, recovery and reflection period, right to temporary residence and work permits for victims are regulated by the Regulation on the Entry of Foreign Nationals into the Kingdom of Norway and their Stay in the Realm (Immigration Regulations - see paragraph 40 for further details).
17. Overall, the Special Representative commends Norway for its robust legislative framework to prevent and combat human trafficking and related crimes, including the provisions which aim to deter the demand that fosters trafficking for forced labour and sexual exploitation. Nevertheless, he sees an opportunity to further advance the legal framework and its practical implementation and draws the attention of Norwegian authorities to the following key issues. While positively noting that the exploitative purposes in the trafficking statute cover key forms of trafficking as well as unique exploitative purposes such as exploitation in military activities, trafficking for exploitation in criminal activities is not covered. As noted in the OSCE's Survey Report⁵, this form of exploitation is increasing rapidly across the OSCE region and is present in Norway. The Special Representative notes the position taken by Norwegian authorities to classify this form of exploitation as a forced labour/service in Norway. Nonetheless, the recent example in Norway of prosecuting the complex case of trafficking in the context of terrorism is a testament that exploitation of a person for criminal activities is a distinct form of the trafficking crime which also risks to carry criminal liability for victims. During the visit, some discussions also touched upon forced marriage which is not included in the form of trafficking purposes, but is criminalized under the CC Section 253. The Special Representative was not provided with the number of cases of trafficking for forced marriage, however notes the findings of the OSCE Survey of 2021⁶ which shows a decline in this form of exploitation in the OSCE region with the caveat that some cases are likely being re-qualified as sham marriages.

During discussions on the application of the criminal code provisions, the Special Representative noted that some law enforcement indicated reticence at taking on complex cases of labour exploitation with a large number of victims due to the high resources required. Moreover, according to numerous interlocutors met during the visit, there are indications that pimping is used frequently as an alternative to the trafficking statute, even if the elements of trafficking may be present. By way of example, the Special Representative notes a case involving over 100 women from Ukraine, Russia and Moldova in Swedish-Norwegian border recruited for prostitution which was initially investigated as pimping and was later analysed through a trafficking lens upon the intervention of the prosecution. There are several negative

⁵ [Survey Report 2021 of Efforts to Implement OSCE Commitments and Recommended Actions to Combat Trafficking in Human Beings | OSCE](#)

⁶ [Combating Trafficking in Human Beings: 2021 Survey Report Launch | OSCE](#)

consequences of failing to properly classify human trafficking cases, including that the legal focus will be on the financial aspects of third-party facilitation rather than the element of exploitation. In such cases, victims may not gain rightful access to services or compensation.

III. Policy and institutional framework

18. With regard to policy framework, a key document for OSCE participating States is the national anti-trafficking action plan, which helps coalesce political will on the topic, lay out strategies and activities for combating trafficking, and identify responsible agencies and mobilize resources. Norway's national action plan against trafficking in human beings (NAP) dates back to 2016 and has not been updated since then. The NAP includes 26 measures grouped under five objectives which envisage (1) strengthened and targeted efforts against human trafficking; (2) coordinated and effective measures to protect and promote the rights of victims; (3) improve police organization and efforts; (4) increased knowledge to detect and prevent human trafficking; and (5) strengthen international co-operation against human trafficking.

The Special Representative notes that while some of the measures included in the NAP still remain valid, such as developing a new mandate for the Co-ordination Unit for Victims of Trafficking in Human Beings (KOM), evaluating secure accommodation for male victims, and ensuring the reflection period serves the purpose of assisting victims to recover and reflect, the NAP is largely outdated and requires the timely action of the Norwegian authorities to not only revise the content but also modernize the structure of the document. In this regard, he recommends that Norwegian authorities develop new NAP that assigns tasks for specific agencies, provides clear timelines, and is matched with a sufficient budget. With regard to the actions, he recommends the new NAP ensures specific actions to address the increasing prevalence of online exploitation of children and adults, including by establishing partnerships with private entities such as technology companies to develop specific tools and strategies; conduct research into various forms of trafficking, such as exploitation in prostitution and for criminal activities; promote partnerships with financial intelligence by including the FIU and financial regulators; establish regular joint capacity building and consultation among various agencies, such as cybercrime, organized crime and trafficking criminal justice practitioners and social service providers; and enhance prevention efforts including by through sex education in the schools and developing exit strategies for persons in prostitution.

19. Another important policy document is Norway's Strategy against Workplace Crime adopted in 2015, and revised and updated in 2017, 2019 and 2021. The revised Strategy focuses on strengthening of inter-agency cooperation to prevent and combat workplace crimes, as well as facilitating information and knowledge sharing among employees and employers, thus aiming for better protection of vulnerable workers and prevention and disclosure of exploitation. Through the Strategy, the government also proposed to increase the penalties for crimes against workers, introduce a new penalty provision against wage theft, and advance the efforts to confiscate the proceeds of crimes. Measure 20 of the Strategy foresees increased assistance to victims of human trafficking of labour exploitation through cooperation with civil society organizations such as Caritas, the Salvation Army and the Church's City Mission.

20. With regard to the institutional anti-trafficking framework in Norway, an Inter-ministerial Working Group against Human Trafficking was set up in 2003 and is chaired by the Ministry of Justice and Public Security. The Group members include the ministries of the Government Administration, Reform and Church Affairs, Children, Equality and Social Inclusion, Labour, Foreign Affairs, Health and Care Services, Education and Research. High-level, multi-stakeholder commissions are important to advance anti-trafficking action at the national level in a coordinated fashion. However, while the Group was reportedly set up to oversee the implementation of the action plan, it has no specific mandated tasks. According to stakeholders met during the visit, the Group's meetings became infrequent leading to inefficiency and fewer outcomes. The mandate of the Group is expected to be revised with a new NAP. The Special Representative would like to be updated on the new structure once it is developed.
21. Additionally, a national co-ordinator is also housed in the Ministry of Justice and Public Security, however the co-ordination role lacks any formal authority and fulfils only an informal coordination function. The Special Representative also concludes that the current placement of the anti-trafficking coordination role is not optimally positioned to establish a necessary robust co-ordination at the national level. Given the number of various institutions and public agencies involved in anti-trafficking work, strategic alignment across the entire government is crucial to ensure that the anti-trafficking efforts are effectively co-ordinated and remain high on the political agenda. He shares the practices of some OSCE participating States which have seen strong advancement in anti-trafficking efforts by placing leadership of anti-trafficking initiatives in an elevated, centralized location such as the Prime Minister's Office.
22. The National Co-ordinating Unit for Victims of Trafficking (KOM) was established in 2006. Its mandate was later revised and now includes coordination between authorities and civil society organizations, contribution to interdisciplinary exchange of information, and serves as a competence centre on combating human trafficking. Despite this mandate, regular and consistent coordination between the government and civil society seemed to be lacking, with civil society reporting a lack of opportunity for substantive exchange and engagement on policy development.

KOM is administratively subordinate to the Police Directorate under the Ministry of Justice and Public Security; it has a separate mandate from the Ministry and is perceived to be an independent structure. The Special Representative commends the advisory role and competency of the KOM and for providing constructive recommendations for the government, which - once implemented - can maximise the effect of the anti-trafficking policy and practice in the country. KOM also collects and maintains data on human trafficking and publishes annual and thematic reports. The KOM annual reports⁷ do not provide statistics on the annual number of victims identified but rather map the number of presumed victims receiving assistance from the authorities and various support schemes, provides an overview of criminal cases, highlights challenges and offers input on improvement measures. The Special Representative notes with concern the lack of unified data available on the identified victims of trafficking since 2016 and highlights that poor and inconsistent data

⁷ [How the police work to combat human trafficking – Politiet.no](https://www.politiet.no/en/for-pressen/2022/04/how-the-police-work-to-combat-human-trafficking)

undermines political will, good policy-making and effective implementation. It also issues guidance papers and tools related to human trafficking, such as the Guide to Identify potential victims of human trafficking⁸; exploitation of children; exploitation in prostitution or other sexual purposes; on exploitation in forced labour or forced services, including begging; information for identified victims of human trafficking and for victims who have been granted a reflection period.

Nevertheless, there are significant limitations to the KOM's operation on several areas: it has no power to instruct other public agencies nor a formal co-operation agreement with other actors, for example to request and collect data; the recommendations issued by the KOM are not binding and lack ownership/buy-in of state agencies (a challenge that derives from the absence of specific accountability for agencies assigned to implementing the NAP); and, with only two experts, it operates with limited human resources. Additionally, its placement within the Police Directorate has substantive disadvantages. While its placement within the Police Directorate enables KOM to be part of the police competence group and operate in close interaction with the specialized police units on the ground, KOM is a layer below the national co-ordination body which is located under the Ministry of Justice and is not placed centrally in government. And finally another weakness of the placement is its security sector positioning whereas the key purpose of the KOM is to facilitate improved identification and assistance to victims which is a much larger scope than the competencies of the police structure.

23. There is no National Rapporteur on trafficking in Norway who would provide independent monitoring and assessment of anti-trafficking action in the country. As mentioned in the above paragraph, KOM collects some data and proposes recommendations in its annual reports. Nonetheless, these recommendations are not binding and remain to be acted upon by the agencies. In this regard, establishment of a National Rapporteur or equivalent mechanism would support Norway towards comprehensive qualitative and quantitative data collection, as well as research and analysis of the trafficking situation by looking beyond what is identified and recorded into what remains latent and unaddressed. The Rapporteur would also contribute to systematic analysis of the effectiveness of policies and measures undertaken to combat trafficking in human beings as implemented by various agencies and institutions and co-ordinated by a National Coordinator. In many OSCE participating States, such role is being entrusted to the Ombudspersons who often have sufficient authority to request and access comprehensive information and data including on individual cases from all necessary sources at the national level.⁹
24. The Norwegian Directorate for Immigration (UDI) is among the key players in anti-trafficking structure having the large mandate of granting reflection periods, as well as issuing residence and work permits for trafficking victims.
25. There are also several other structures established to address various forms of trafficking both from policy and operational perspectives, such as Inter-Agency Centre for combating labour exploitation (A-Krim centre) (further discussed in paragraph 47) and the National Guidance Unit for Cases of Trafficking in Children established under

⁸ [guide-to-identification-of-possible-victims-of-trafficking.pdf \(politiet.no\)](#)

⁹ [Issue Brief - The role of independent National Rapporteurs or equivalent mechanisms in enhancing States' anti-trafficking responses | OSCE](#)

the Directorate for Children, Youth and Family Affairs (Bufdir) (see paragraph 38 for more details).

26. The Special Representative commends the vigorous work done by anti-trafficking NGOs in Norway in outreach, identification, assistance and reintegration and rehabilitation of trafficked persons and potential victims of trafficking, and awareness raising. While acknowledging the co-operation between KOM and the civil society organizations, he is concerned about the absence of consistent and substantive engagement or a platform for co-ordination and discussion with civil society organizations. NGOs are not part of the Inter-agency group nor are being consulted on policy development and implementation of the NAP. Recalling the recommendations set out in the OSCE report “the Critical Role of Civil Society in Combating Trafficking in Human Beings”¹⁰, he underscores the need for a regular co-ordination, co-operation and a sustained financial support to NGOs to advance the country’s victim outreach and support and allow for the sustainability and effectiveness of organizations’ operations. He recommends that Norwegian authorities establish a substantive platform for engagement with civil society organizations.
27. In conclusion, the Special Representative notes a need for updating and reorganization of Norway’s anti-trafficking policy and coordination mechanisms. He calls on the authorities to develop a new national action plan through a multi-agency working group, including with input from civil society. He also reiterates the benefit of the coordination mechanism that includes a higher-level, multi-agency commission with a designated chair and specified mandate, as well as a centrally-placed, designated coordinator with support capacity. One avenue to improve the system could be to formalize the current national coordinator function in the Ministry of Justice and integrate KOM to harmonize coordination efforts, enhance efficiency, and increase capacity. Finally, the national coordination mechanisms should include formal engagement with civil society to ensure that policies are developed with the able contribution of NGOs that are largely carrying the burden of victim assistance.

IV. Identification, referral and assistance for victims of trafficking

28. As noted above, there are noticeable gaps in the country’s data collection, sharing and retention that have been a constraint to understanding the scale and scope of human trafficking in the country. For example, the total number of victims identified annually is unknown in Norway. As stated in paragraph 22, KOM collects and annually publishes data on assistance measures to victims, criminal cases and adjudications in its situation reports. However, these reports do not provide disaggregated data on the total number of victims identified, forms of trafficking or gender of victims. Nonetheless, the KOM data and those provided by international reports are indicative of an overall decline in the number of identifications, with prevalence of trafficking for sexual exploitation in prostitution followed by forced labour/ service which also encompasses those exploited in criminal activities.
29. According to the KOM 2021 Situation Report, a total 197 adult presumed victims of human trafficking received assistance from housing and/ or follow up measures in

¹⁰ [The Critical Role of Civil Society in Combating Trafficking in Human Beings | OSCE](#)

2021, a decrease from 254 in 2020. Of the 197 assisted, 149 were women, 47 were men and one was a transgender victim. One hundred sixteen victims were believed to have been exploited in prostitution or other sexual exploitation, 68 in forced labour or services, 10 in a combination of prostitution or other sexual exploitation and forced labour/services and three were trafficked for organ removal. The majority of victims (79) were from Eastern European countries, followed by African countries (67), Western and Southern European countries (10), South American countries (13) and the Middle East (2).

30. Despite the strong policy framework on trafficking and pimping, as well as the ban on purchase of sexual services in Norway, there is a significant exploitation of foreign women in prostitution. For example, the Special Representative was informed about the recent potential case of trafficking of over 100 women recruited in Moldova, Ukraine and the Russian Federation and transported across the Swedish-Norwegian border for the purposes of prostitution in Norway, which suggests a large demand. These acts are increasingly facilitated through online platforms and taking place in private households. Websites such as “Real escort” advertise prostitution, highlighting the inadequate and largely ineffective application of the aforementioned laws. The data provided by civil society organizations working with persons in prostitution, as well as analysis of criminal cases, also show increasing sexual exploitation in massage parlours.
31. According to criminal reports published by the Ministry of Justice, sexual offences have significantly increased in the past years, with a steep increase in sexual offences committed against children under 18, including on the Internet. The report states that in 2021, every fourth reported case of sexual offence against a minor under 14 was facilitated through technology while the corresponding proportion of sexual intercourse with children between 14 and 16 was 11 per cent. The practitioners reported a concerning trend of young children posting self-generated sexual images and being lured/recruited through offers of money or clothing. In its concluding observation in 2018, the Committee on the Rights of the Child (CRC) expressed its concern on oversexualized and objectified representation of girls in the media and recommended a set of action including conducting a research into root causes and possible impact of the issue and the possible connection between sexualization and pornography and the root causes of gender based violence.¹¹ The Special Representative expresses his concern over these reports involving exploitation of children, particularly via the Internet. During the visit, little evidence of proactive efforts to identify victims online was reported. He urges the Norwegian authorities to adapt their modes of identification from the offline environment to the online environment to prevent and combat this form of exploitation against children. He also urges collection of data disaggregated by gender and age, of the means of recruitment and form of sexual exploitation of children. While acknowledging that the Norwegian authorities are acutely conscious of this rising form of violence against children, a comprehensive and unified dataset on children affected by this phenomenon would better inform policy responses and assist the government in developing effective preventive and protective mechanisms. He also calls on the Norwegian authorities to include a specific action in the new NAP that focuses on preventing and combating various forms of child trafficking for the purpose of sexual exploitation of children, with a specific focus on online identification and prevention.

¹¹ [OHCHR | CRC/C/NOR/CO/5-6: Committee on the Rights of the Child: Concluding observations on the combined fifth and sixth periodic reports of Norway](#)

32. Children are also subjected to exploitation for criminal activities including in committing drug-related offences. According to stakeholders, children particularly from North Africa who are involved in drug trafficking are also substance abusers; this phenomena is also being observed in other OSCE participating States. The Special Representative notes that trafficking for exploitation in criminal activities is widespread and a significant exploitative pattern in Europe; a high proportion of victims are children.¹² These cases often come to the attention of the authorities primarily as offenders and they may not be easily recognized as victims of a serious crime. Therefore, States should be fully aware of these developments in order to enable accurate victim identification and effective investigation of the trafficking crime, as well as to ensure effective protection of victims' rights, including non-punishment of victims for offences caused or directly linked with their being trafficked.¹³ In this regard, the Special Representative strongly recommends that Norway amends its human trafficking definition to include trafficking for exploitation in criminal activities among the list of exploitative purposes (currently these offenses are classified under forced labour or services). If such amendments are not pursued, a specific guidance on trafficking for exploitation in criminal activities should be developed and utilized through additional training and awareness-raising for all front line agencies responsible for victim identification including criminal justice practitioners and the judiciary.
33. As a country of destination, in the recent years, Norway has been facing increasing numbers of cases of labour exploitation primarily affecting vulnerable migrants in construction, cleaning, agriculture and fishing. Exploitation of migrant workers is also classified as high risk in the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim) threat assessment report, and “occurring in labour-intensive occupations with a high proportion of unskilled workers such as car maintenance, seasonal work on farms and in the fishing industry”. In 2022, Fafo Institute for Labour and Social Research issued a report “Gross exploitation of migrant workers. The grey zone between the regular labour market and human trafficking”¹⁴ and revealed that exploitation of some vulnerable workers lies in a grey area. Because some of these cases may not meet the legal criteria for human trafficking, this vulnerable group may be precluded from obtaining adequate help. Although several high-profile labour exploitation cases¹⁵ drew the attention of the authorities to the growing pattern of labour related crimes, labour exploitation cases are often not recognized as such but instead qualified as “social dumping” cases (the term refers to the practice of giving workers and particularly migrant workers, significantly poorer pay and employment conditions than Norwegian workers).¹⁶ The Special Representative recommends that Norwegian authorities enhance their measures to identify victims of labour exploitation through increasing outreach activities to industries prone to exploitation, such as agriculture, fishing, tourism and hospitality, cleaning and domestic work.
34. Persons in domestic work, particularly au-pairs, are at high risk of exploitation in OSCE participating States, including Norway. The available data and the findings of

¹² [Trafficking into crime and begging - Anti-Slavery International \(antislavery.org\)](https://www.antislavery.org/)

¹³ [Policy and legislative recommendations towards the effective implementation of the non-punishment provision with regard to victims of trafficking | OSCE](#), p.9

¹⁴ [English summary \(faf.no\)](https://www.faf.no/)

¹⁵ [The victims of the Lime case: worked up to 16 hours a day – got 10,000-12,000 reward \(newsbeezer.com\)](https://www.newsbeezer.com/)

¹⁶ [action-plan-to-combat-social-dumping-and-work-related-crime-2022.pdf \(regjeringen.no\)](https://www.regjeringen.no/)

the visit show that au-pairs are exploited both for labour and sex. Since 2017, Caritas has been managing a national centre for counselling and assistance to au-pairs and host families which reported an increasing number of inquiries made by au-pairs over work pressure. Increasing risk has led the Norwegian authorities to adopt a new set of rules¹⁷ to prevent exploitation and safeguard the rights of workers. Nonetheless, in 2022, authorities increased the application fee for au pairs from 8,400 to 9,100 NOK which is believed to be a risk for further exploitation and may discourage them to change the family if the conditions are not adequate or exploitative.

35. Regarding the system for identification and assistance, the development and adoption of the NRM has been under discussion in Norway. In the absence of the NRM, all agencies (police, immigration, child protection, social services) can identify victims of trafficking and refer them to assistance and based on the information received during the visit, this system seems to be largely effective on a case-by-case basis. Although 2016 NAP envisaged to give the mandate to identify and refer victims for assistance to KOM, this action remains unfulfilled. KOM has developed a Guide to Identification of Possible Victims of Trafficking¹⁸ which provides basic information about the system of identification, specific guidance in cases if the victim is minor, and general indicators for victims of human trafficking. The guide also includes the list and contacts of all relevant agencies such as police, child protection service, UDI, KOM and NGOs. According to the Guide, a person who is identified as a possible trafficking victim may be verified as a victim by the police and prosecution authorities, the immigration authorities or the child protection service (in case of child victims). There is no requirement that the police, the immigration authorities and the child protection service come to the same conclusion regarding the victim's status. Importantly, this system allows for multiple pathways to identification and assistance, including avenues that are not necessarily law enforcement based. As Norway continues to develop its identification and assistance scheme, it is recommended that it continues to ensure that assistance is not dependent on cooperation with criminal justice authorities.
36. Closer to the NRM system is the Human Trafficking Support Oslo (HTSO) which was established in 2019 as a measure in Oslo municipality's action plan against human trafficking. Since then it has expanded and now is a key structure for identification and assistance to trafficking victims in Oslo municipality. The HTSO has the responsibility to coordinate and implement Oslo's anti trafficking action and has entered into a formal cooperation agreement with several stakeholders including NGOs in the field. It serves as a nationwide competence unit as well as guidance office on human trafficking for all NAV offices in the country and operates a national anti-trafficking helpline. The HTSO follows up with victims who have applied for or been granted a limited residence permit in the reflection period, offers them housing and pays a subsistence allowance. In 2021, HTSO assisted a total of 20 adult presumed victims and one accompanying child, a slight decrease from 2020 (24 victims). The majority of victims (11) were exploited for forced labour or services, followed by victims exploited in prostitution (7) and a combination of sex and labour trafficking (2).
37. Trafficking victims are primarily assisted by NGOs based on grants awarded annually by the Ministry of Justice and Public Security. NGOs ROSA, the Church City Mission

¹⁷ [New au pair rules and regulations from 2022 \(energypair.no\)](https://www.energypair.no/en/nyheter/2022/01/new-au-pair-rules-and-regulations-from-2022)

¹⁸ [guide-to-identification-of-possible-victims-of-trafficking.pdf \(politiet.no\)](https://www.politiet.no/globalassets/2022/01/guide-to-identification-of-possible-victims-of-trafficking.pdf)

Nadheim, the Marita Foundation provide accommodation for female victims and their children. The Salvation Army runs a safe house for male victims of THB, Filemon. Accommodation for victims is also provided by the HTSO and at crisis centres for victims of violence. The Special Representative is pleased to note the availability of various accommodation options for trafficking victims. Nevertheless, he notes the importance of long-term rehabilitation for trafficking victims which necessitates a sustained and multi-year funding scheme to civil society organizations.

38. In an effort to advance the protection of child victims of trafficking, in 2019 Norwegian government established the National Guidance Unit for Cases of Trafficking in Children under the Norwegian Directorate for Children, Youth and Family Affairs. The Unit's mandate is to improve procedures for identification of child victims, provide guidance and training to build capacities and guide competent agencies and bodies on child trafficking. The Institute for social research evaluated the guidance unit and its report was pending issuance in December 2022. The evaluation is expected to elaborate on the challenges facing welfare services with the aim to ensure better guidance. There are 244 child welfare services around the country with the high turnover. Therefore regular capacity building awareness is necessary to keep abreast of the changes and ensure the services are adequately equipped with relevant knowledge and skills to provide services to child victims of trafficking.
39. There are 11 Children's Houses (Barnehus)¹⁹ in Norway established as a joint project by three ministries: Ministry of Justice and Public Policy, the Ministry of Health and Care Services and the Ministry of Children Equality and Social Inclusion. Established as part of the local police, Barnehus Model is a multi-agency model based on the one-door principle in reported cases where children and youth may have been subjected to or witnessed violence or abuse, harmful sexual behaviour, sexual mutilation and forced marriages. These houses represent a very good standard for the OSCE region. Statistics provided by the Agency show an increase in cases both in violence and sexual abuse of children with 436 in 2010 to 1515 in 2016 and 905 in 2021. It is unknown whether this increase is due to an increase in violence or improvement in identification; further assessment should be conducted on this question. After each interview, it conducts follow up work to draw conclusions guided by the interests of the child where they elaborate on child's behaviour, mood, impressions and possible actions needed for the child such as a treatment. The Special Representative welcomes the establishment of the Children's Houses and particularly the follow up work that is focused on the child's interest and welfare.
40. As stated in paragraphs 16 and 24, UDI is the agency to grant a reflection period, issue residence permits and asylum for trafficking victims, and assist in their return. Pursuant to immigration regulations, victims are eligible to a six-month reflection period which cannot be renewed and is only granted to persons without legal residence in Norway. According to stakeholders met during the visit, the reflection period would benefit greatly from content to provide needed support to victims rather than spent as a cosmetic arrangement. Following the reflection period, victims can also receive a limited residence permit for up to 12 months with the possibility of renewal which purports to facilitate prosecution of perpetrators and residence permit as a witness. In 2021, UDI issued 20 decisions on reflection period or limited residency in relation to

¹⁹ [The Childrens House Oslo | Statens Barnehus](#)

19 persons, and 7 decisions on asylum. The Special Representative notes international standards that require States to provide for the rights of recovery and reflection period to the victim to recover and escape from the influence of traffickers,²⁰ and encourages provision of a temporary or permanent residence permit independent of a person's decision to cooperate with criminal justice.²¹

41. Identification of trafficking among persons seeking asylum, refugees, and particularly unaccompanied minors was one of the points discussed during the visit. In Norway, unaccompanied minors from Afghanistan are the single largest group (46 percent) followed by Eritrea (15 per cent), Somalia (12 per cent) and Syria (7 per cent) with boys comprising the majority of minors.²² UDI has the responsibility for the care of unaccompanied minors between 15-18 years old when they stay in the reception centres, before and after status determination, regardless of legal status. Minors under the age of 15 are in the responsibility of Directorate for Children, Youth and Family Affairs (Bufetat). Unaccompanied minors who disappear from reception centres has been a challenging issue for a number of participating States. A majority of the unaccompanied minors who disappear have a temporary residence permit and disappear shortly before they turn 18. According to civil society organizations, in 2015, a majority of children identified by them as trafficking victims were unaccompanied minors.

42. The Special Representative observes that while victims are generally served, such as with housing, he has concerns on a few key areas which can have profound effects on the enjoyment of rights of victims and their rehabilitation and reparation. Firstly, he is concerned about the lack of access of trafficking victims to healthcare and psychological assistance. According to civil society organizations, many victims have difficulty in accessing healthcare due to the lack of social security. Similarly, psychological assistance is only available in emergency situations. The stakeholders consulted during the visit justified this gap as limited availability of psychological assistance to many Norwegians, however, a lack of availability of a service is not adequate justification for failing to serve victims and suggests a lack of attention to the specific trauma inflicted on trafficking victims. The Special Representative highlights that trafficking victims often suffer from post-traumatic stress disorder, anxiety, eating and sleeping disorders and major depression (these were also described by civil society organizations during the visit). He underscores that healthcare and particularly psychological assistance should be provided as immediate assistance for trafficking victims followed by a longer-term therapeutic intervention as they progress towards recovery. A second major concern is related to access to work and empowerment of victims. While the laws allow trafficking victims to work during a reflection period (which is not the case in some participating States), there are several hurdles to exercise this right such as finding a job that would fit their skills and capacities, unavailability of their bank accounts, and having no access to social insurance.

²⁰ Article 13 of the CoE Convention requires that all state parties provide a recovery and reflection period of at least 30 days in domestic law which should be sufficient for the person concerned to recover and escape from the influence of traffickers.

²¹ Article 14 of the COE Convention; The UNODC Toolkit to Combat Trafficking in Persons states that “granting a reflection period, followed by a temporary residence or permanent residence permit, would ideally be granted to victims of trafficking regardless of whether the person is able or willing to give evidence as a witness”

²² [Unaccompanied minor refugees 1996-2020. Demographics, education, employment, income and child welfare services. \(ssb.no\)](https://ssb.no)

Finally, given the number of agencies involved in providing assistance, such as NGOs, municipalities, improved coordination of these measures is necessary. During the visit, the Special Representative was informed about the current debate on assigning this coordination role to UDI due to its mandate on reflection period, residency and work permits for trafficking victims. The Special Representative expresses his concern with this potential solution and does not support assigning the coordination of assistance to the agency whose role is primarily to combat irregular entry and safeguard country's borders. The Special Representative highlights that victims of trafficking often breach immigration laws or other laws by crossing the border illegally or by using false documentation. Even if they have entered the country legally, they may breach the conditions of entry by overstaying or working or by violating labour regulations.²³ In this regard, the core mandate of the immigration agency contradicts the crucial obligation of the State to identify and protect the trafficking victim and ensure the victims are not punished for the criminal activities of their traffickers. Such an approach would be a notable shift from human rights complaint approach to immigration enforcement, which also contravenes with country's overall policy on promotion of human rights. This approach has been undertaken in a limited number of participating States with highly detrimental outcomes. To this end, following thorough discussions held with stakeholders, the Special Representative holds the opinion that the role of coordination of identification and assistance is entrusted to a different entity such as KOM, as envisaged in 2016 NAP, provided that its human and financial capacities are adequately increased to fulfil this large function.

V. Investigation and prosecution of human trafficking

43. The criminal justice response to various forms of trafficking is characterised by both promising initiatives and challenges in Norway. In recent years, several institutional structures and partnerships were built to reach effective criminal justice to various forms of trafficking such as A-Krim Centres, KRIPOS and extension of trafficking specialization in all police units. Recent years also saw the adjudication of some ground-breaking and complex trafficking cases by the judiciary. Nevertheless, the statistical data provided by KOM criminal cases indicate gradual decline in prosecution and convictions of trafficking cases, which is inconsistent with a growing scale of trafficking across the OSCE region. The discussions during the visit also indicate the need for increased efforts to boost criminal investigations that are corroborated by special investigative techniques, financial investigations and closer attention to the online landscape of criminal activities.
44. As indicated above, Norway established specialized anti-trafficking police units in all twelve police districts that conduct criminal investigations of THB. At the national level, the following number of investigations were conducted in recent years: 46/2017; 45/2018; 36/2019; 39/2020; 29/2021. The Special Representative also met with the Oslo district police unit which is the largest among the units with up to 400 investigators specialized in murder, sexual, organized crimes and financial investigations. It has the highest rate of investigations among twelve district police human trafficking units; from 2017 to 2021, it investigated 64 cases followed by West

²³ [Policy and legislative recommendations towards the effective implementation of the non-punishment provision with regard to victims of trafficking | OSCE](#)

Police district with a total of 15 cases during the same period. The share of investigations ranges between 3 to 5 cases for the rest of the ten police districts. As seen from the statistics, the investigations show a steady decline with the prevailing number of cases of exploitation in prostitution (27/2017; 24/2018; 17/2019; 17/2020 and 14/2021) followed by forced labour (16/2017; 18/2018; 15/2019; 20/2020 and 10/2021). The Special Representative notes that despite the specialization, law enforcement results are not adequate to the scale of exploitation in the country. Some interlocutors explained this as police being overwhelmed with the complexity of the crime, a lack of commitment to the issue and/or insufficient resources.

45. The National Criminal Investigation Service (KRIPOS) has been operational since 2016 and is mandated to co-ordinate the National Expert Group on THB. The Expert Group is tasked with increase the competencies of police officers and facilitate an exchange of experience between police and prosecutors. It also conducts meetings, seminars and an annual conference on specific areas of concern. The Special Representative was informed that the topic of the next annual conference is the non-punishment principle. KRIPOS establishes working groups on certain areas of concern to facilitate discussion and knowledge sharing. For example, working groups were established on exploitation of seasonal workers in farming and on the update of the list of trafficking indicators in light of the war against Ukraine. A cyber unit was also established within KRIPOS and is currently working on a project to mainstream cyber focus across the Service's activities.
46. As mentioned in earlier paragraphs, the Internet is increasingly used by traffickers to recruit, exploit and control victims for various purposes. This challenge was referenced by various interlocutors in regard to the rapidly increasing pattern of recruitment and exploitation of minors for sexual exploitation. In addition to online exploitation in Norway, there are also reports of Norwegian citizens either traveling with the purpose to sexually exploit children or engaging in child sexual abuse and exploitation online. According to an ECPAT report²⁴ referring to data from KRIPOS, in 2013-2014, 400 persons previously convicted of child abuse travelled to countries in high risk regions. In December 2017 approximately 2000 attempts to access webpages with child sexual abuse materials were registered by the Child Sexual Abuse Anti-Distribution Filter (CSDAAF) on a daily basis in Norway. Skype, MSN, Netby, Onlinebandit.no are among the internet service providers offenders have accessed to exploit children. To keep pace with the increasing misuse of technology for trafficking purposes and also with the opportunities that new technologies present for combating THB, and taking into account the shift of the prostitution industry online, the Special Representative recommends that law enforcement and prosecutors are supported with more human and financial resources to make use of online investigations and specialized technology tools to scale up the fight against technology-facilitated human trafficking, including the necessary software, hardware and consistent training.²⁵
47. To fight labour-related crimes, Norway established "A-Krim Centres" composed of Norwegian Labour Inspection Authority, NAV, the police and the Tax Administration in Oslo, Bergen, Trondheim, Stavanger, Kristiansand, Bodo and Tonsberg. The common goal of the centre is to reduce the threats, enable access of foreign workers to their rights. As of July 2022, a new regulation on information sharing was enacted

²⁴ [COUNTRY-NORWAY.pdf \(ecpat.org\)](#)

²⁵ [Leveraging innovation to fight trafficking in human beings: a comprehensive analysis of technology tools | OSCE, 2020](#)

which is expected to ease data exchange. The cases identified by the centres are then further investigated by the individual agencies. Although interlocutors met during the visit indicated that the system is still a work in progress and additional policy adoption may be necessary to fully realize the benefits of the system, this multi-agency system represents a highly promising approach to labour-related crime and should be considered by other OSCE participating States.

48. The Special Representative notes the heavy reliance on victim and witness testimony within criminal proceedings, and notes that this is a contributing factor to the low rate of prosecution of THB cases across the OSCE.²⁶ According to criminal justice practitioners met during the visit, and data contained in KOM reports, there are several challenges to criminal investigations of human trafficking cases. These challenges include: victims' resistance and fear to cooperate with law enforcement; the frequent return of victims to their country of origin; a lack of proactive investigation and use of special investigative techniques; and difficulties to collect evidence and produce quality intelligence for prosecution. The reports further indicate lack of co-operation between cross-operational teams to share confidential data between agencies. Furthermore, as noted above, identification of victims is too low. All these challenges, coupled with the lack of sufficient resources and lengthy period required for investigations, result in too few human trafficking cases or requalification to other crimes. The consequences are impunity of traffickers and a failure of justice for victims.

The Special Representative underscores the existence of a plethora of interventions which include can improve the situation, including to incentivize victim co-operation by providing them with effective victim protection and assistance including adequate housing, mental health services, residency permits and other trauma-informed care. Important for the criminal justice response is the use of strategies and tactics that emphasize collection of corroborating evidence or, in the ideal scenario, develop victim-less investigations and prosecutions through under-cover operations, stings or alternative sources of evidence, such as financial evidence. To this end, recalling the conclusions of the 20th Alliance against Trafficking in Persons Conference²⁷, the Special Representative recommends several actions for criminal justice practitioners. Firstly, prosecutors and investigators should pursue all available avenues for early cooperation and collaboration between their departments on combating various forms of human trafficking. Secondly, authorities should enhance their efforts to effectively investigate and prosecute perpetrators of human trafficking by considering other sources of evidence, in addition to the victim testimony, as well as improve victim assistance and protection schemes to secure victim co-operation in criminal proceedings, including by ensuring non-conditional residence permits for victims/witnesses. Finally, he strongly recommends that criminal justice practitioners and prosecutors receive additional training on conducting investigations and prosecutions in the absence of a co-operative victim to enhance the ability of authorities to hold traffickers accountable.

49. With regard to financial intelligence and investigations into the proceeds of human trafficking, the Financial Intelligence Unit (EFE) is placed under the Norwegian

²⁶ [Ending Impunity Delivering Justice through Prosecuting Trafficking in Human Beings | OSCE](#), 2020

²⁷ [Ending Impunity Delivering Justice through Prosecuting Trafficking in Human Beings | OSCE](#)

National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim). The FIU's primary and general function is to receive, process and analyse suspicious transaction reports (STRs) from obliged entities and communicate this information to police, supervisory authorities and international partners. Økokrim issues its analysis and assessment through risk assessment, threat assessment and trend reports. When preparing strategic and investigative analyses and intelligence products, Økokrim is obliged to take into account the priorities set by the Government and directives of the law-enforcement and prosecution. Such prioritisation was put *inter-alia* on tax fraud, exploitation of workers and internet related sexual abuse and other criminal activities in 2021. As per 2021 annual report, there has been a gradual increase in STRs filed by the reporting entities over the last five years, from 8901 STRs received in 2017 to 16,513 in 2021. From 2020 to 2021, the number of reports increased by around 30%, the largest year-on-year increase during the last five years.²⁸ During the same period, 3446 STRs were filed due to suspicion of tax fraud and exploitation of workers. The number stayed relatively stable at around 600–700 during the period 2017–2020, rising to 823 in 2021. The Special Representative was informed about the increase in the number of STRs related to online child sexual abuse from 160 in 2017 to 459 in 2021. Of the numbers, 66 percent of STRs were made by payment service providers. FIU has also established criminal cases based on transactions, which resulted in investigations and convictions. STRs related to online sexual abuse contributed to convictions in 2021. The FIU received 100 STRs related to human trafficking, however it is believed that the true numbers is higher than reported.

Because human trafficking is a financially motivated crime, financial investigations conducted in parallel to criminal investigations are an increasingly important tool in disrupting the business model of traffickers and in enhancing the use of corroborating evidence in prosecutions. Financial investigations can be used both as a punitive measure against traffickers, as well as a protective measure for victims, helping to deliver reparations and compensation for trafficked persons.²⁹ FIUs play a crucial role in analysing and exchanging information concerning unusual and suspicious transactions that may include finances deriving from trafficking in human beings, and thus serve as intermediaries between the private sector and law enforcement authorities, including to facilitate exchange of strategic and tactical data. To this end, the Special Representative commends the work of the Norwegian Financial Intelligence Unit in focusing on various forms of trafficking, including for the purposes of forced services, begging, organ removal and military service in a foreign country.

Nevertheless, he recommends several action points that would harness the considerable potential of the FIU within the anti-trafficking agenda and increase cooperation between anti-money laundering practitioners and anti-trafficking stakeholders. Firstly, he invites the MOJ to include Økokrim/FIU in the Inter-ministerial Working Group against Human Trafficking to enable information exchange and dialogue. Secondly, he recommends that financial investigations into THB - particularly through partnership with financial sector - are included as a measure in the new NAP to enable closer engagement of the FIU to share typologies and red-flag indicators with the financial services sector. Thirdly, he recommends that the FIU include human trafficking for

²⁸ Financial Intelligence Unit, Annual Report 2021

²⁹ [Joint Statement on the Critical Role of the Financial Sector in Combating Trafficking in Human Beings and Modern-day Slavery | OSCE](#)

sexual exploitation among the main predicate offences of money laundering in the next National Threat and Risk Assessment.

50. With regard to the adjudication of trafficking crimes, since the introduction of human trafficking provisions in 2003, a total of 52 convictions were served to trafficking perpetrators to date.³⁰ Of the 52 cases, 14 cases involved exploitation of minors, 41 concerned exploitation in prostitution and other sexual purposes (of which eight cases involved exploitation of minors); 10 cases concerned exploitation for forced labour/services which includes also exploitation in committing crimes; and 1 of the cases concerned combination of sexual and labour trafficking. The dataset between 2019-2022 shows fewer cases reaching convictions, such as 4 convictions in 2019, 1 in 2020, 3 in 2021 and none in 2022. Of these 8 cases, 4 judgments resulted in acquittals of the defendant. The majority of sentences range between 2-4 years of imprisonment bar a few where defendants received five or seven years of prison.

51. One of the biggest human trafficking cases adjudicated in Norway is the “Lime case” which involved a large number of Pakistani citizens who were exploited in 20 shops in the Lime grocery chain in several cities of Norway. The case went before the Oslo District Court from January to December 2016, and in the Borgarting Court of Appeal from September 2019 to September 2020. In the Court of Appeal, the twelve defendants were defended by a total of 25 lawyers; the prosecution consisted of two state prosecutors, a police prosecutor and two assistants from the police, and three assistance lawyers; four interpreters were appointed. The extensive Court of Appeal judgment is 1,248 pages long. The Borgarting Court of Appeal charged 12 perpetrators and 11 of them for serious human trafficking. Seven offenders were convicted for aggravated human trafficking and were also sentenced for a number of other criminal offences including breaching Working Environment Act and several serious frauds. Five defendants were acquitted for complicity and the main act of human trafficking where the judge found that all five persons were actually exploited in employment relations and were in a vulnerable situation to submit to traffickers. The case provides an interesting overview of large-scale exploitation, particularly from Norwegian experience. It shows the complexity of labour trafficking cases that involve a combination of various criminal offences ranging from violation of labour rights, tax evasion, fraud, immigration and human trafficking. Its success is also linked to engagement and early collaboration of various agencies such as four police districts, KRIPOS, Økokrim and NAV in investigation and evidence collection. It also showcases an increasing use of subtle means used by traffickers to control and exploit victims, such as abusing their vulnerability to obtain their consent to travel to Norway with the aim to receive permanent residence permit after three years. The judgement concludes that while victims were not directly tricked into the situation, everyday work differed from what they agreed to and the victims lived and worked in distress with the fear to lose their job if they complained about the exploitation. The Special Representative positively notes the coordinated and collaborative efforts that contributed to conviction of traffickers and the consideration of crucial elements of irrelevance of the victims’ consent and change in circumstances to prove the elements of trafficking.

³⁰ [rettsavgjorelser-om-menneskehandel.pdf \(politiet.no\)](https://www.politiet.no/rettsavgjorelser-om-menneskehandel.pdf)

52. The non-punishment principle in regard to trafficking victims is not enshrined in national law in Norway. Pursuant to the Criminal Code Section 61 (Waiver of Sentencing) the court may, when exceptional reasons so warrant, waive sentencing. In deciding whether exceptional circumstances apply, particular weight shall be given to whether imposing a sentence will have the effect of an unreasonable additional burden on the offender, provided that the purpose and effects of the penalty in general do not indicate that a sanction should be imposed. In the view of the Special Representative, this standard is too narrow and the threshold is too high to serve the purpose of the non-punishment principle given, for example, that victims could be arrested, prosecuted and convicted before the court would apply such an exceptional circumstance. However, the 2022 goals and priorities of the Director of Public Prosecutions recall the principle provided under Art 26 of the Council of Europe Convention on Action against Human Trafficking and provides that “authorities are obliged to look after the victims of human trafficking, and that suspects in cases of employment crime may, depending on the circumstances, themselves be victims of human trafficking or forced into other crimes”.³¹

The presence of the non-punishment principle is particularly relevant in cases of persons exploited for criminal activities, a phenomena which is on the rise in the OSCE region. One of the prominent cases where the principle was applied is the case of trafficking of a women in the context of terrorism, in which the Appeal court judge considered the change in circumstances of the women resulted in her exploitation, albeit that she voluntarily travelled to Syria with her husband in 2013, however upon the death of the husband, she was forced to marry and could not leave Syria. The Supreme Court judgement of 19 December 2022 ruled that the woman fulfilled the important role intended for women in ISIS then and actively contributed to maintenance of the organization. Nevertheless, the Supreme Court also considered the change in circumstances in women’s condition whereby she was coerced to stay and was sexually abused by her husbands. The mitigating circumstances also included the hardship conditions in which she had to live in Al-Hol camp until January 2020. The court therefore set the sentence to one year and four months of imprisonment which was considered to have been served on remand.³²

The Special Representative notes that in examining this complex case involving a nexus between trafficking and terrorism, the judiciary had to consider the abuse of vulnerability of the victim and that the person had no other real option but to submit to the will of the terrorist group. He commends the approach taken by the judiciary in studying and applying international law and policy in application of the non-punishment principle. The Special Representative also notes that the principle has been one of the key focuses of Norwegian authorities, namely the Ministry of Justice, the prosecution and the police and will continue to be among priority topics in 2023.

Nevertheless, he believes that clear and specific legislation or policy guidance is necessary to support the full and effective implementation of the non-punishment principle in relation to all forms of trafficking and recommends that Norwegian authorities include specific reference to the non-punishment principle in national policies, including by considering advancing the topic in the policy documents developed to guide criminal justice practitioners and the judiciary.

³¹ [The Attorney General's goals and priorities for 2022 – The Attorney General \(riksadvokaten.no\)](#)

³² [hr-2022-2418-a.pdf \(domstol.no\)](#)

VI. Prevention of human trafficking

53. The Special Representative notes enhanced efforts of Norway to advance constructive and multi-stakeholder measures to prevent trafficking in human beings, particularly for forced labour. These efforts include adoption of the Transparency Act for supply chains, an updated Strategy to fight workplace crimes, the swift establishment of systems and actions to sensitize authorities at the local level to the risks of trafficking and exploitation of Ukrainians seeking safety from the war, and contributing to promotion of human rights through development projects of the Ministry of Foreign Affairs. Nevertheless, due to a largely outdated NAP and a lack of unified data collection system, prevention efforts remain restricted to certain forms of trafficking discounting major challenges that exist in exploitation of foreign women in prostitution, increasing technology-facilitated trafficking, and trafficking in children.
54. The Special Representative commends Norway for its increased focus on ensuring transparency in supply chains via its adoption of the Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act) that came into force on 1 July 2022 as mentioned in paragraph 15. Compared to other similar legislative initiatives, this Act applies to a large range of companies (approximately 9,000) including companies registered in Norway and foreign companies that are taxable in Norway and meet at least two of three criteria: at least 50 full-time employees or equivalent annual man-hours; an annual turnover of at least NOK 70 million and a balance sheet sum of at least NOK 35 million. Under the law, the companies are obliged to conduct human rights due diligence assessments on their operations in accordance with the Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development (OECD) and their entire supply chains; to report on all of their activities and publish an account of their due diligence assessments on their websites by 30 June each year (Section 5); and finally to respond to information requests from the public about how they address potential and actual impacts on human rights and decent working conditions (Section 6). The Act also follows the principle of proportionality, requiring that due diligence is carried out regularly and in proportion to the size of the enterprise, the nature of the enterprise, the context of its operations, and the severity and probability of adverse impacts on fundamental human rights and decent working conditions. The monitoring of compliance with the provisions of the Act is entrusted to the Norwegian Consumer Authority, an independent administrative body under the Ministry of Children and Family Affairs, whose mandate also includes the authority to sanction companies that are in breach of the Act. Pursuant to Section 11 the Consumer Authority and the Market Council may issue individual decisions regarding probation and orders, enforcement and infringement penalties.³³ Nevertheless its main focus to date has been on raising awareness and providing guidance to businesses.
55. The Norwegian Coalition for Responsible Business (KAN)³⁴ was instrumental in the development and adoption of the Transparency Act. KAN is a coalition of business, trade unions, civil society organisations and other movements calling for a human

³³ [The Transparency Act - Forbrukertilsynet](#)

³⁴ [About KAN | Coalition for Responsible Business Conduct \(koalisjonenkan.no\)](#)

rights law for business. Its purpose has been redefined and now includes a new steering group consisting of the following members: Hydro, Storebrand, and the Norwegian Bar Association, the Forum for Development and the Environment, and Amnesty International. It serves as a common place and forum for dialogue for the KAN members to exchange information and experiences related to the implementation of the Act.

56. The Special Representative notes that while the Norwegian Transparency Act serves as a ground-breaking example internationally, civil society organizations expressed concerns on several areas: the Act does not provide for civil liability for harm, falling short of the latest legislative and judicial developments in this field; lacks environmental aspects; does not provide a duty for businesses to inform about their production sites; and limits sanctions to administrative only. According to the Amnesty Norway met during the visit, the law should further embrace a risk-based approach. Currently the Law is mandatory for approximately 9,000 companies, including foreign companies, depending mainly on the size. However, it is not just the size of the company that decides the risk that business may face, but the industry sector and the country where the business operates. Hence, the due diligence requirement should be revised to incorporate attention to risk, not only size. At the same time, it needs to be kept in mind that small and medium sized enterprises (SMEs) might face much higher risks, and may not have the resources to adequately conduct due diligence.
57. Prevention of labour-related crimes and protection of workers are led by the Norwegian Labour Inspection Authority (NLA). Its activities are regulated by several laws and regulations particularly, the Working Environment Act, the Holiday Act, and other relevant legal documents. In case of violation of the legal acts and regulations, the NLA can issue an order to the enterprise to correct the situation (which can be appealed), impose fine in cases of non-compliance with the order, close the enterprise if the life and health of the employees are in imminent danger, and report cases of serious breaches of act to the police. The NLA carries its function through internal control audits, verification/inspection visits and investigations. In past years, the NLA reported 457 cases serious breaches of health and safety regulations to the police, however, the number of labour trafficking cases identified by the NLA is not known.

In 2021, the NLA was given the competence to order back payment of wages. As of July 2021, the new statutory pay and working conditions apply within nine industries that are considered to be prone to exploitation: cleaning companies, construction sites, electricians, fish processing enterprises, freight transport companies, agriculture, hotel, restaurant and catering, the maritime construction industry, and passenger transportations.³⁵ The Special Representative positively notes the platform for workers developed by the NLA, “Know Your Rights”, which includes information about rights and obligations of employees available in eight languages. Workers can also report poor working conditions through the websites³⁶ of the NLA. The Special Representative further notes the Service Centre for Foreign Workers (SUA), a platform of a cooperation between the Labour Inspection Authority, the police, the Tax Administration and UDI, which aims to provide guidance and support to foreign

³⁵ [These are the current minimum wages within nine industries in Norway | FriFagbevegelse](#)

³⁶ [Tips oss om kritikkverdige forhold - Arbeidstilsynet](#)

workers in Norway. To this end, the Special Representative commends Norway's enhanced attention and action to prevent exploitation and abuse in workplaces.

58. In comparison, broad policy attention and operational action to sexual exploitation in Norway is relatively less than with regard to labour exploitation. Although sexual exploitation is still a predominant form of identified human trafficking cases in the criminal justice system, the evidence – including the size of commercial sex marketplace as indicated by online platforms – strongly suggests the problem is considerably larger. One challenge is that policy and operational attention to online platforms, which are currently serving as facilitators and accelerators of exploitation, is nascent. A second challenge is that there is inadequate attention on discouraging demand. As described in paragraph 14, Norway introduced a criminal liability for purchase of sex with the inclusion of criminal law provisions. Nonetheless, a strategic and operational lacuna resulted in civil society organizations taking the lead and initiating independent actions rather than the government. The Special Representative met with civil society organizations working with persons in prostitution and with sex buyers. The resource centre for men REFORM has been working to support men and boys through face to face counselling and a men's helpline focusing on anger management, sexual and mental health problems. The Kast Project implemented by the Organization is unique as it confronts the demand through dialogue, therapeutic treatment of persons who purchase sex as a preventative measure aimed at clients in prostitution. Since its inception the project has yielded positive results to discourage demand for sexual exploitation. The Special Representative commends the commitment and the work of the civil society organizations to tackle the demand through assisting persons in prostitution and educating those who purchase their services. Nevertheless, these commendable approaches are too limited in scale; the efforts of Norway to discourage the demand should aim at being holistic by utilizing multiple measures and tools in a co-ordinated response.³⁷ Pairing robust implementation of criminal justice measures with education initiatives for young men and boys (as well as developing exist strategies for persons who wish to exit prostitution) are crucial pieces of counter-trafficking prevention work, should be state-led, and need to be included in the new NAP.

59. Since February 2022, Norway received more than 30,000 refugees from Ukraine, the majority of whom are women and children. According to the International Federation of Red Cross (IFRC) report of August 2022, Norway has seen a decrease in the number of refugees who are arriving in Norway, with approximately 70-80 refugees registered from Ukraine every day. More than 1/3 of the refugees have been given permanent residence, while many are still waiting for a permanent residence and are living at shelters.³⁸ Amid increasing numbers of unaccompanied minor or minors traveling with unrelated adults, Norwegian authorities issued letters to all municipalities to warn about the risks of human trafficking and held numerous coordination meetings and trained the staff to spot and prevent any trafficking. The Special Representative positively notes the numerous prevention and protection activities and campaigns conducted by UDI, police, labour inspectorate and other government agencies to mitigate the risk of human trafficking for Ukrainian refugees.³⁹ He commends Norway

³⁷ [Discouraging the demand that fosters trafficking for the purpose of sexual exploitation | OSCE](#)

³⁸ [IFRC GO - NOR: Population Movement - 2022-02 - Norway: Ukraine Refugee Situation #7 \(2022-08-08\)](#)

³⁹ [Information for refugees from Ukraine - UDI](#)

for its efforts to implement the recommendations issued by the Special Representative to mitigate the risks of trafficking of persons fleeing the war against Ukraine⁴⁰. Nevertheless, he notes that as the war continues and Europe faces economic challenges, the vulnerability of Ukrainian refugees is likely to increase. Particular concern remains in relation to a toxic demand for sexual access to Ukrainian women: an exponential increase of online searches for Ukrainians women across Europe will provide a strong incentive to recruit girls and women into prostitution. The relatively recent case involving exploitation of over 100 women in prostitution, including some from Ukraine, described in paragraph 30 is a disturbing development and is likely to continue if not adequately identified and prosecuted aggressively. He therefore recommends that Norwegian authorities conduct systematic monitoring of workplaces and online platforms to detect and prevent trafficking for various exploitative purposes against this vulnerable group.

60. The promotion of human rights is a key component of Norway's foreign and development policy. As part of its efforts to ensure an integrated human rights policy, Norway contributes to the global efforts to prevent and combat trafficking in human beings. Development work is pursued through its development agency Norad and through Ministry of Foreign Affairs (MFA)-supported programmes. Norway pursues development policy that targets governments in countries to support the implementation of laws and policies, corporate sector and vulnerable groups. Norad provides funding support to NGOs, international organizations and multilateral organizations with the prime focus on agriculture, fishing and construction sectors and domestic work. The Special Representative commends the active engagement of the MFA and Norad in promoting human rights in preventing and combating trafficking in human beings.
61. In conclusion, while positively noting the commitment and numerous steps taken in the prevention and countering of trafficking by the Government of Norway, particularly through strong policy adoption, the Special Representative encourages the authorities to continue their efforts and invites them to consider the following recommendations to enhance the implementation of OSCE anti-trafficking commitments, in particular the OSCE Action Plan to Combat Trafficking in Human Beings and its Addenda⁴¹. The Special Representative and his Office stand ready to provide technical assistance, if requested, to national and local authorities, as well as civil society, and welcomes further dialogue and co-operation to promote appropriate follow-up to these recommendations.

⁴⁰ [Recommendations on enhancing efforts to identify and mitigate risks of trafficking in human beings online as a result of the humanitarian crisis in Ukraine | OSCE](#)

⁴¹ OSCE Permanent Council, Decision No. 557/Rev.1 *OSCE Action Plan to Combat Trafficking in Human Beings* (Vienna, 7 July 2005); OSCE Permanent Council, Decision No. 1107 *Addendum to the OSCE Action Plan to Combat Trafficking in Human Beings: One Decade Later* (Vienna, 6 December 2013).

VII. Recommendations

1. Enhance legal, policy and institutional framework by:

- Amending legislation to include explicit references to two key anti-trafficking principles: “the irrelevance of victim consent” to the intended exploitation and “non-punishment principle” in regard to trafficking victims in line with the international instruments.

- Including trafficking for exploitation in criminal activities in the forms of trafficking defined under Articles 257 and 258.

- Ratifying the International Convention on the Protection of the Rights of all Migrant Workers and Members of their Families of 2003.

- Developing new National Action Plan that assigns tasks for specific agencies, provides clear timelines, and is matched with a sufficient budget. The new NAP should at minimum ensure specific actions to address the increasing prevalence of online exploitation of children and adults, including by establishing partnerships with private entities such as technology companies to develop specific tools and strategies; conduct research into various forms of trafficking, such as exploitation in prostitution and for criminal activities; promote partnerships with financial intelligence by including the FIU and financial regulators; establish regular joint capacity building and consultation among various agencies, such as cybercrime, organized crime and trafficking criminal justice practitioners and social service providers; and enhance prevention efforts including through better implementation of laws on curbing demand, relevant sex education in schools, and developing exit strategies for persons in prostitution.

- Reviewing the mandate and activities of the Inter-Ministerial Working Group against Human Trafficking to ensure its meetings are frequent and its mandate encompasses the power to assign tasks to members and make decisions.

- Upgrading the position of the National Anti-Trafficking Co-ordinator to allow for more effective, strategic co-ordination across the entire government and to ensure anti-trafficking remains high on the political agenda of the government.

- Amending the mandate and the placement of the National Co-ordinating Unit for Victims of Trafficking (KOM) by combining it with the national co-ordinator function to ensure comprehensive and efficient coordination across government.

- Establishing a unified and comprehensive database which would include data on number of victims identified, assisted, sheltered, and granted residency permits; the number of compensation claims submitted and granted; the number of investigations, prosecutions, convictions and sentences; and the assets confiscated and recovered from traffickers.

- Establishing a National Rapporteur function to ensure independent and comprehensive monitoring and evaluation of anti-trafficking efforts including by collecting and analysing quantitative and qualitative data and conducting research and studies into the trafficking situation.

2. Enhance victim identification, assistance and protection by:

- Formally establishing a body to co-ordinate victim identification and assistance scheme and consider entrusting this role to KOM as part of its possible advanced mandate and placement.

- Developing and implementing training on identification and referral of victims of various forms of trafficking for relevant authorities, especially front-line officers who may be the first ones in contact with a potential victim of trafficking, including law enforcement, labour inspectors, social workers, and staff of child welfare institutions.

- Enhancing measures to identify victims of all forms of human trafficking, particularly sexual exploitation through increasing proactive outreach activities including through screening of at-risk children, monitoring of online platforms advertising sexual services including escort services, and inspection for labour exploitation in industries prone to exploitation, such as agriculture, textile, fishing and hospitality and domestic work, as well as hidden forms such as trafficking for the purpose of exploitation in criminal activities that primarily target children and domestic work particularly au-pairs.

- Addressing online platforms that ignore risks or facilitate exploitation on their platforms through policy action requiring implementation of safety measures; risk assessments; due diligence and monitoring for illicit content; reporting to authorities; and enhanced transparency. Policies should also provide for enforcement by authorities and liability for harms occurring on or through the platforms.

- Urgently providing a comprehensive and enhanced response to the rapidly growing sexual violence against children. Including a specific task in the new NAP on identification of and assistance to child victims of trafficking. Additionally, collecting and maintaining coherent unified data of exploited children segregated by gender and age, of the means of recruitment and form of exploitation. Ensuring that practitioners are trained and supported in working with distressed and traumatised children.

- Enhancing measures to identify victims of trafficking among persons in asylum processes and in detention facilities for irregular migrants.

- Improving victim assistance by urgently granting immediate access of trafficking victims to healthcare and psychological assistance, followed by a longer-term therapeutic intervention; ensuring non-conditional granting of residency permits to trafficked persons; facilitating access to employment by developing victims' skills, and ensuring access to financial services and social insurance.

3. Enhance the criminal justice response to all forms of human trafficking by:

- Boosting investigations by identifying and collecting sources of evidence in addition to victim testimony including by making use of special investigative tools, including wiretapping, surveillance and undercover operations, in all trafficking cases, financial investigations, the

using of the pre-recorded direct evidence and consider pre-recorded cross-examination methods for all victims of trafficking. Developing capacity building activities for investigators and prosecutors to advance victimless investigations and prosecutions.

- Improving victim assistance and protection schemes to enhance victim co-operation in criminal proceedings, including by ensuring non-conditional residence permits for victims/witnesses, facilitating the return of co-operating victims to testify at trial and enhancing training for prosecutors and judges in application of victim-centred and trauma-informed approaches.

- Allocating specialized human and financial resources to law enforcement and prosecutors to investigate human trafficking facilitated through the internet, including with the use of the KRIPOS mandate to conduct multi-department/agency training and capacity building activities to benefit from specialized technology tools which could scale up the fight against human trafficking.

- Including Økokrim/Norwegian FIU and the financial regulators in the inter-agency task force to enable information exchange and dialogue, and incorporating a measure in the new NAP to enable closer engagement of the Financial Intelligence Unit in the anti-trafficking agenda and enable exchange of information and data - such as typologies and red-flag indicators - with the financial services sector. The FIU should include human trafficking for sexual exploitation among the main predicate offences of money laundering in the next National Threat and Risk Assessment.

4. Enhance prevention of human trafficking by:

- Increasing and supporting prevention efforts by focusing on the demand that fosters all forms of trafficking, including through: including specific measures in the new NAP to target demand, particularly that which fosters sexual exploitation; effectively and broadly implementing the criminal law provision that criminalizes the purchase of sexual services; pairing implementation of criminal justice measures with education initiatives for young men and boys; develop exit strategies and programmes for individuals wishing to exit prostitution. Such programmes should include, but not be limited to, education and employment opportunities that can help to support individuals who may have to go through a challenging transition process; and closely monitoring the venues where prostitution services can be procured (particularly online) to prevent the exploitation of adults and children in this industry.

- Enhancing the measures to identify victims of labour exploitation through increasing outreach activities and unscheduled inspections to industries prone to exploitation, such as agriculture, fishing, tourism and hospitality and domestic work.

ANNEX I

Programme of the visit

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|------------------------------------|---|
| Monday, 5 September 2022 | |
| 16:00 | Meeting with with anti-trafficking NGOs |
| Tuesday, 6 September 2022 | |
| 08:30-10:00 | Meeting with the Childrens House |
| 10:30-11:45 | Joint meeting with the Ministry of Justice and Public Security, Police Department and the Co-ordinating Unit for Victims of THB (KOM) |
| 12:30-13:45 | Joint meeting (victim rights) |
| 14:00-16:00 | Joint meeting (welfare services, child assistance) |
| Wednesday, 7 September 2022 | |
| 08:30-10:30 | View ongoing THB case/discussions with the judiciary |
| 11:00-11:45 | Meeting with the National Authority for Investigation and Prosecution of Economic and Environmental Crime ((Økokrim)/ Financial Intelligence Unit |
| 13:00-15:30 | Joint meeting (law-enforcement) |
| Thursday, 8 September 2022 | |
| 09:00-10:30 | Joint meeting (prosecution) |
| 10:30-11:15 | Meeting with the Ministry of Foreign Affairs |
| 11:15-12:15 | Meeting with the Ministry of Children and Families (Transparency Act) |
| 13:00-14:30 | Meeting with members of the Paliament |
| 15:00-16:00 | Meeting with the Inter-Ministerial Group |
| Friday, 9 September 2022 | |
| 09:30 | Meeting with REFORM/Resource Centre for Men |