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CoE Convention on Action against Trafficking in Human Beings

Observations by the NHRI – fourth evaluation round - FINLAND

This document contains observations by the Finnish Human Rights Centre (HRC[1], NHRI) to the fourth evaluation round of Finland regarding Council of Europe Convention on Action against Trafficking in Human Beings

Should you have any further questions or need for additional information, do not hesitate to contact us at leena.leikas@eduskunta.fi

The document may be published on the committee's website.

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[1] The Human Rights Centre represents the Finnish National Human Rights Institution (NHRI) in international NHRI cooperation and other international and European cooperation in human rights.

The NHRI comprises the Human Rights Centre, its pluralistic 39-member Human Rights Delegation, and the Office of the Parliamentary Ombudsman. The institution complies with the UN Paris Principles and the Global Alliance of NHRIs (GANHRI) accredited it with A-status in 2014, 2019 and 2025.

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Focus of the fourth evaluation round

1. The fourth evaluation round of the Convention focuses on vulnerabilities to human trafficking and measures taken by States Parties to prevent them, detect and support vulnerable victims, and punish the offenders. This includes a focus on the use of information and communication technology (ICT), which brings structural changes to the way offenders operate and aggravate existing vulnerabilities

Key Challenges Facing Vulnerable Victims

2. Although some positive developments have taken place, the main challenges remain same or similar in comparison to earlier monitoring rounds.

- **Difficulties in identifying victims**: Many victims remain unidentified by authorities, despite their increased training and guidance. Trafficking is usually hidden within labour exploitation, forced criminality, forced marriage, or sexual exploitation. Often the victims do not recognize themselves as victims either. Lack of information on various forms of trafficking or fear of authorities and/or traffickers prevents victims from seeking help.
- **Migrants and asylum seekers**: People with insecure residence status, limited language skills, dependence on employers/traffickers, or poor knowledge of their rights face an increased risk of exploitation and difficulties in accessing protection and assistance. Also, closure of the eastern border and limited access to asylum procedures increases risk of persons not being identified as trafficking victims.
- **Labour exploitation**: Human trafficking and exploitation takes place particularly in agriculture (including berry picking), cleaning services and construction, restaurants, and domestic work. Victims are often underpaid, they work excessive hours, they owe money to their employers/traffickers, and their freedom is restricted.
- **Fear of authorities and deportation**: Victims are unwilling to report abuse. They fear losing their employment, residence permit, income, or custody of their children. There is also lack of trust in authorities.
- **Challenges in access to justice**: excessive length of investigations and criminal proceedings is a fact, partly due to insufficient funding. Victims experience difficulties in obtaining compensation, legal assistance, and effective remedies.
- **Special risks for children and young people**: Children can be exposed to trafficking for sexual exploitation, criminal exploitation, or forced labour. Identifying child victims is particularly challenging, especially when

exploitation occurs online or within family and community networks.

- **Mental health and trauma-related barriers**: Many victims suffer from trauma, anxiety, depression, or other mental health consequences that make disclosure, recovery, and participation in legal processes more difficult.
- **Access to assistance and support**: Although specialised support services exist, victims often require long term assistance in housing, healthcare, psychological support, legal counselling, language training, and integration into society. Many service providers (public service or NGOs) are currently facing severe or even paralysing cuts to their funding for unforeseeable future. This is bound to affect also services for trafficking victims.

3. Most of these challenges are also faced by victims of domestic violence and violence against women and, in general, by many other victims of crime.

Budgetary cuts

4. International monitoring bodies, including GRETA, have repeatedly expressed concern over lengthy criminal proceedings, insufficient resources for police, prosecutors and courts, and decreasing funding available for victim support services. These challenges undermine victims' access to identification, protection, remedies and compensation.

5. Recent Government report on the Administration of Justice (5 November 2026[2]) examines the state, development and key challenges of the administration of justice in Finland between 2022 and 2026. The report states that main challenges facing the field of administration of justice in Finland continue to be the excessive length of proceedings and the high cost of trials. This is partly due insufficient personnel and financing in the administration of justice.

6. In the earlier report in 2022, it was estimated that the administration of Justice needs additional funding in average 90 million EUR annually. According to the recent report, this has now increased to close to 100 million EUR annually.

7. Due to national financial crisis the current Government has repeatedly and increasingly implemented budgetary cuts affecting all sectors of administration for upcoming years. Although additional funding has been allocated to the police, prosecution and the courts for a while, considerable reductions in budgets and personnel are predicted for 2027 and beyond. This combined with a record high number of pending cases, including cases that are increasingly complicated, will have an effect also on the length of all investigations and prosecutions that are to be prioritised, for example those relating to trafficking.

8. At the same time, the austerity affects social services, among others, and risks weakening the protection and services of trafficking victims.

[2] https://valtioneuvosto.fi/-/1410853/oikeudenhoidon-selonteko-asiamaarien-kasvu-ja-julkisen-talouden-heikentynyt-tilanne-haastavat-oikeudenhoitoa (in Finnish and Swedish)

9. Budgetary cuts affect also civil society organisations and, in some cases, closing them down entirely. This has a disproportionate impact on victims as NGOs play a crucial role in victim identification, outreach, legal counselling, psychosocial support and referral to the official assistance system. The reductions also affect the ability of the NGOs to develop services, build expertise and provide long term assistance.

Foreign seasonal workers

10. In 2026, the Government submitted a proposal to amend the Aliens Act and the Seasonal Workers Act[3], aiming to strengthen measures against recruitment fees and labour exploitation affecting migrant and seasonal workers. The amendments are pending in Parliament. The proposed amendments are expected to enter into force in March 2027.

11. While the proposed amendments aim to prevent labour exploitation, the Human Rights Centre is of the view that many gaps remain in addressing vulnerabilities that can lead to trafficking.

12. The proposal seeks to tackle recruitment fee practices ("threshold fees") that increase workers' dependency on employers and expose them to debt-based coercion and exploitation. Existing preventive mechanisms have proven cumbersome and ineffective. The proposed measures focus on fees charged directly by employers or with their knowledge and does not cover recruitment fees charged by intermediaries, recruitment agencies, and other actors. Other debts arising from recruitment, travel, and related costs remains equally insufficiently addressed.

13. Equally, in cases where an employer becomes subject to an exclusion decision (not able to seek permits), the migrant workers may already have incurred substantial debts and expenses during the recruitment process. Their status remains unclear.

14. The proposal also overlooks abuse linked to “fake” self-employment. Migrant workers may be pressured to accept self-employed status without fully understanding the loss of labour protections. As it is, lack of information on Finnish institutions, labour rights, and available remedies remains a major risk factor for labour exploitation.

15. No additional need for resources is acknowledged in the proposal nor is any proposed for the implementation and monitoring of the regulations.

16. The proposed amendments are a step in a good direction, but on many accounts, they fall short of addressing many of the pressing issues concerning seasonal worker’s rights and their risk of becoming victims of trafficking. The victim-centred approach needs further strengthening.

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[3] Government proposes changes to residence permit procedure to combat labour exploitation - Ministry of Economic Affairs and Employment