

FOURTH EVALUATION ROUND

Measures to prevent and detect vulnerabilities
to human trafficking

EVALUATION REPORT NORWAY

GRETA
Group of Experts
on Action against
Trafficking in Human Beings



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on Action against Trafficking
in Human Beings

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Preamble

In accordance with Article 38, paragraph 1, of the Convention on Action against Trafficking in Human Beings ("the Convention"), GRETA evaluates the implementation of the Convention following a procedure divided into rounds. At the beginning of each round, GRETA selects the specific provisions on which the evaluation procedure is based.

The first round of monitoring of the Convention provided an overview of its implementation by States Parties. The second evaluation round examined the impact of legislative, policy and practical measures on the prevention of trafficking in human beings (THB), the protection of the rights of victims, and the prosecution of traffickers, paying particular attention to measures taken to address new trends in human trafficking, in particular trafficking for the purpose of labour exploitation, and child trafficking. The third evaluation round focused on trafficking victims' access to justice and effective remedies.

GRETA has decided that the fourth evaluation round of the Convention will focus on vulnerabilities to human trafficking and measures taken by State Parties to prevent them, detect and support vulnerable victims, and punish the offenders. An additional focus concerns the use of information and communication technology (ICT) to commit human trafficking offences, which brings structural changes to the way offenders operate and exacerbates existing vulnerabilities.

A number of provisions of the Convention establishing substantive and procedural obligations are relevant to this topic. The concept of "vulnerability" appears in Articles 4 (definitions), 5 (prevention of trafficking in human beings) and 12 (assistance to victims) of the Convention. According to paragraph 83 of the Explanatory report to the Convention, "by abuse of a position of vulnerability is meant abuse of any situation in which the person involved has no real and acceptable alternative to submitting to the abuse. The vulnerability may be of any kind, whether physical, psychological, emotional, family-related, social or economic. The situation might, for example, involve insecurity or illegality of the victim's administrative status, economic dependence or fragile health. In short, the situation can be any state of hardship in which a human being is impelled to accept being exploited. Persons abusing such a situation flagrantly infringe human rights and violate human dignity and integrity, which no one can validly renounce."

GRETA refers to the ICAT Issue Brief No. 12/2022 on Addressing vulnerability to trafficking in persons which refers to vulnerability as "those inherent, environmental or contextual factors that increase the susceptibility of an individual or group to being trafficked". It classifies vulnerability factors in three categories: personal (e.g. age, gender, ethnicity, disability), situational (e.g. destitution, unemployment, legal status) and contextual (e.g. discriminatory laws, policies and social norms, armed conflicts, crises) factors, which interact and may increase the risk of human trafficking for certain individuals, groups and/or communities.¹ Vulnerability to human trafficking is also subject to intersectional factors, such as gender, belonging to a minority group and socio-economic status.

In addition to the thematic focus on vulnerabilities to human trafficking, GRETA has decided that each State Party will receive country-specific follow-up questions related to recommendations not implemented or partially implemented after the third evaluation round.

GRETA recalls that it has adopted the use of three different verbs - "urge", "consider", and "invite" - which correspond to different levels of urgency for bringing the State Party's legislation and/or practice into compliance with the Convention. Thus, GRETA uses the verb "urge" when it assesses that the national legislation or policies are not in compliance with the Convention or when it finds that, despite the existence of legal provisions and other measures, the implementation of a key obligation of the Convention is lacking. In other situations, GRETA "considers" that it is necessary to make further improvements to fully comply with an obligation of the Convention. By "inviting" a country to pursue its efforts, GRETA acknowledges that the authorities are already on the right track and encourages them to continue existing action.

¹ [ICAT Issue Brief No. 12 on Addressing vulnerability to trafficking in persons - Search \(bing.com\)](#)

Executive summary

This report, covering the period 2022 - March 2026, evaluates the measures taken by Norway to prevent vulnerabilities to trafficking in human beings (THB), detect and support vulnerable victims, and punish the offenders. In doing so, it pays particular attention to the use of information and communication technology (ICT) to commit human trafficking offences as well as the use of technological innovations to prevent THB, protect victims and prosecute traffickers. The report also evaluates progress made in selected areas examined by GRETA during previous evaluation rounds.

During the reporting period, the Norwegian authorities have continued to develop the legislative, institutional and policy framework for combating THB. This has included the introduction of the new criminal offences of wage theft and gross wage theft, amendments to the Working Environment Act and the Child Welfare Act. In March 2025, the Norwegian National Human Rights Institution was assigned the role of independent National Rapporteur on THB, Violence against Women and Domestic Violence. A new National Strategy against Human Trafficking for the period 2025-2030 was launched in May 2025. GRETA welcomes the adoption of the new National Strategy and invites the Norwegian authorities to ensure that it is supported by the necessary resources to ensure its implementation.

There is still no formal and systematic data collection on identified victims of trafficking in Norway. According to estimates by the National Co-ordinating Unit against Human Trafficking (KOM), around 100 adult persons were identified as new victims annually in the period 2022-2024. The majority of them were subjected to sexual exploitation, followed by forced labour or services. The victims originated primarily from Latin American countries, followed by Africa, Eastern Europe and Asia. There has been an increase in the number of identified Norwegian victims, including children subjected to sexual abuse through digital platforms. Reiterating the recommendations made in its previous reports, GRETA considers that the Norwegian authorities should establish a comprehensive system for collecting data on victims of THB.

The Norwegian authorities consider that the personal, situational and contextual situation of foreign women in prostitution places them in the highest position of vulnerability. Consequently, the new National Strategy against Human Trafficking includes as a priority measure to identify and assist victims exploited in prostitution. GRETA considers that the Norwegian authorities should take further steps to reduce the vulnerability of persons engaged in prostitution to human trafficking, in particular by raising awareness among this group of the risks of human trafficking and the support services available to victims and developing exit programmes for persons wishing to leave prostitution.

Another group vulnerable to THB are migrant workers, particularly those employed in labour-intensive and lower-skilled sectors, such as agriculture, construction, fishing, cleaning, hospitality and transport. The Norwegian authorities have taken steps to prevent the exploitation of migrant workers, including amendments to the Working Environment Act and the setting up of Service Centres for Foreign Workers (SUA). The Norwegian Labour Inspection Authority has a human trafficking team whose mandate is to detect indicators of human trafficking and forced labour in the workplace. However, several problematic areas are highlighted in the report, including the use of middlemen as recruiters or supervisors of migrant workers and insufficient information available to migrant workers about their rights, protection and the support services available. Seasonal workers are not paid every month, which makes them particularly vulnerable and dependent on their employers and/or intermediaries. It is also very difficult for exploited workers to access remedies for wage theft under the current system. GRETA considers that the Norwegian authorities should take further steps to prevent trafficking of migrant workers, in particular by proactively providing them with information on their rights and employment conditions, support services, grievance mechanisms and access to remedies. The authorities should also strengthen existing laws and policies, including banning recruitment fees by law, ensuring that wages are paid monthly, making the wage guarantee system accessible to all migrant workers, and introducing more frequent controls and stronger sanctions for employers who operate with illegal agreements, conditions and contracts.

Asylum seekers and refugees are particularly vulnerable to becoming victims of THB. The National Police Immigration Service (PU) has developed training on THB for its employees as well as local action cards and guidelines to support the identification of potential victims. Moreover, the Directorate of Immigration (UDI) has developed action cards, guidelines and training for its staff to facilitate the detection of indicators of THB amongst applicants for international protection. While welcoming the attention to the detection of vulnerabilities of THB amongst asylum seekers and refugees, GRETA considers that the authorities should implement capacity-building measures for the border police to enable them to detect THB indicators and ensure that a proper vulnerability assessment is carried out. The authorities should also facilitate greater access to the labour market, vocational training and Norwegian language courses for asylum seekers.

The vulnerabilities of children to THB are linked to negative social control, dependency relationships, belonging to an ethnic minority group, mental health or substance abuse problems, or being an unaccompanied child. A growing concern is child criminal exploitation by criminal gangs, in particular in selling drugs. While commending the work of the National Guidance Unit for Cases of Trafficking in Children, GRETA considers that the Norwegian authorities should take additional steps to raise children's awareness of the risks of THB, including recruitment and abuse through internet/social networks, and establish mandatory and regular training on THB for child welfare workers, health-care providers and other frontline professionals. Moreover, the authorities should strengthen monitoring and follow-up mechanisms for unaccompanied children, including those who go missing from reception facilities, and take steps to improve the process of safe transitioning into adulthood.

GRETA welcomes the attention paid by research to the vulnerabilities of LGBTI persons and considers that the Norwegian authorities should continue taking steps to address their vulnerabilities to trafficking, in close co-operation with civil society organisations. Moreover, GRETA considers that the Norwegian authorities should conduct research into the vulnerabilities of persons with disabilities to trafficking in human beings and develop preventive measures specifically aimed at this group.

The new National Strategy against THB envisages the establishment of a National Referral Mechanism (NRM) which will be co-ordinated by the Secretariat of the National Mediation Service. In 2023, KOM developed a national guide for identification of possible victims of THB. However, there are problems with the identification of victims amongst persons engaged in prostitution, due to lack of resources and prioritisation of other crimes by the police. Further, possible cases of THB for the purpose of labour exploitation referred by NGOs to the police are not systematically investigated and many victims are overlooked. GRETA urges the authorities to improve the identification of victims of THB, in particular by setting up a formalised NRM which defines the roles and responsibilities of all frontline actors who may come into contact with victims, and co-operating with specialised NGOs to improve the proactive detection of victims. The authorities should also screen irregular migrants about to be returned for indicators of THB, especially among groups who may be considered at risk, such as persons engaged in prostitution.

Furthermore, GRETA considers that Norwegian authorities should provide longer-term, sustainable and sufficient funding for NGOs that offer assistance to victims of THB in order to ensure the continuity of victims' assistance, guarantee a sufficient number of accommodation places for victims, including outside Oslo, and improve timely access to health care and psychological support for victims of THB.

The number of presumed child victims of THB identified in Norway is very low. Frontline workers often lack adequate knowledge about child trafficking. The absence of a specialised shelter for child victims of THB is another issue of concern. GRETA urges the Norwegian authorities to strengthen the identification of child victims of trafficking by setting up without further delay an NRM which is in line with trafficked children's specific needs, taking proactive measures to identify child victims without solely relying on police risk assessment, and providing training to all professionals working with child victims of THB.

GRETA welcomes the application of the concept of "abuse of vulnerable situation" in THB cases and considers that the Norwegian authorities should ensure that it is covered by the training provided to investigators, prosecutors and judges.

The police units working on THB in the country's 12 police districts have continued to exist, but the number of staff working on THB cases has been reduced due to other priorities. While welcoming the activities of the National Police Competence Group on THB, GRETA is concerned that the investigation of human trafficking cases is not given sufficient resources and attention. The number of THB cases registered by the police has been decreasing over the years and the number of convictions for THB is low, in particular for trafficking for the purpose of labour exploitation. GRETA once again urges the Norwegian authorities to ensure that human trafficking offences are proactively and promptly investigated, to provide adequate financial and human resources to the specialised police THB units, and to ensure that human trafficking offences are prosecuted as such, rather than as other/lesser offences, every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted.

Perpetrators are increasingly using online platforms to recruit and deceive potential victims of THB. The authorities have initiated the development of educational tools and awareness-raising programmes aimed at informing children and young people of the risks of THB. The police employ a wide variety of investigative methods, such as monitoring platforms advertising sexual services and obtaining information from international money trail investigations. However, removing harmful online content is a significant challenge. GRETA considers that the Norwegian authorities should develop further measures specifically aimed at preventing ICT-facilitated THB, including capacity building of law enforcement officers, labour inspectors and financial police officers and digital tools to conduct proactive investigations. The report also notes the need to develop data-sharing procedures and co-operation protocols with companies holding relevant data, including social network and gig-economy companies as well as rental platforms.

There have been no changes to the legal provisions concerning the recovery and reflection period and the number of persons granted such a period continues to be low. In order to be granted this period, victims have to submit an application in person to the police, but many of them are afraid to go to the police due to the absence of adequate protection measures. Further, the six-month time-limit of the residence permit affects the victims' ability to get a job. GRETA once again urges the Norwegian authorities to ensure that the reflection period is in compliance with Article 13 of the Convention and that all presumed foreign victims of THB can benefit from its protective scope and the assistance measures provided during it.

While welcoming the new Act on Compensation for Victims of Violent Crimes, GRETA considers that the Norwegian authorities should make additional efforts to guarantee effective access to compensation for victims of THB, in particular by ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain from the exploitation of the victim, is part of the criminal investigations with a view to supporting compensation claims in court.

In addition, GRETA considers that the Norwegian authorities should take further steps to ensure trafficking victims' access to legal assistance and free legal aid, in particular by ensuring that free legal counselling is provided to a sufficient extent and by lawyers who have received training on THB. To this end, the authorities should put in place a system to certify lawyers who are qualified to provide legal aid to victims of trafficking and ensure that trafficking victims are systematically appointed a specialised lawyer.

Norwegian law does not have a specific provision on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they have been compelled to do so. GRETA was provided with several examples of victims being prosecuted for drug-related or other offences which they were compelled to commit. The new National Strategy against THB states that the application of the non-punishment principle can be challenging for criminal justice professionals and it should be considered whether there is a need for legislative changes. GRETA urges the Norwegian authorities to take measures to ensure compliance with the non-punishment provision, including by encouraging prosecutors to be proactive in establishing whether an accused person is a potential victim of trafficking, ensuring that all negative consequences faced by victims of THB, such as detention, deportation, entry bans or delays in seeking legal residence in Norway, are lifted, and adopting a specific legal provision on the non-punishment of victims of trafficking.

General information on trafficking in human beings in Norway

(covering the period from 2022 until March 2026)

Entry into force of the Council of Europe Convention on Action against Trafficking in Human Beings	1 May 2008
Previous evaluations by GRETA	<ul style="list-style-type: none"> • First evaluation report (published on 7 May 2013) • Second evaluation report (published on 21 June 2017) • Third evaluation report (published on 8 June 2022)
Co-ordination of national action against trafficking in human beings (THB)	<ul style="list-style-type: none"> • Ministry of Justice and Public Security • Inter-departmental Working Group against Human Trafficking
National Rapporteur on THB	The Norwegian Human Rights Institution was designated as National Rapporteur on THB in March 2025
Specialised bodies and NGOs contracted to provide assistance to victims of THB	<ul style="list-style-type: none"> • Co-ordination Unit against Human Trafficking (KOM) • Human Trafficking Support Oslo (HTSO) • National Guidance Unit for Cases of Trafficking in Children • Police National Competence Group on THB (under the National Criminal Investigation Service, KRIPOS) • NGOs ROSA, Marita, Salvation Army, Church City Mission Nadheim, Caritas
National Strategy/Action Plan	National Strategy against Human Trafficking (2025-2030), launched on 28 May 2025
Relevant legislation	<ul style="list-style-type: none"> • Norwegian Criminal Code (sections 257 and 258 criminalise THB) • Immigration Act and Immigration Regulations • Child Welfare Act • Integration Act • Act on Compensation for Victims of Violent Crimes • Working Environment Act
National Referral Mechanism (NRM)	A National Referral Mechanism is currently not in place in Norway, but its establishment is a key objective of the new National Strategy (2025-2030).
Trafficking profile	Norway is primarily a destination country for victims of trafficking in human beings, but there have also been several Norwegian nationals identified as victims in the reporting period. Around 100 adult persons were identified as new victims annually in the period 2022-2024. The majority of the victims were subjected to sexual exploitation, followed by forced labour or services. The victims originated primarily from Latin American countries, followed by Africa, Eastern Europe and Asia. The number of presumed child victims of THB has been low (8 in 2024).

I. Introduction

1. Following the entry into force of the Council of Europe Convention on Action against Trafficking in Human Beings (“the Convention”) in respect of Norway on 1 May 2008, the Norwegian authorities have taken a series of measures to develop the legislative, institutional and policy framework for combating THB in the light of the obligations under the Convention. This has included amendments to the Norwegian Criminal Code and the Immigration Regulations, and the setting up of specialised structures, such as Human Trafficking Support Oslo, the National Guidance Unit for Cases of Trafficking in Children, police anti-trafficking units in all police districts, and the Police National Competence Group on THB. However, after three rounds of evaluation, GRETA concluded in its third evaluation report on Norway that there were continuing gaps in certain areas, such as the absence of a National Referral Mechanism (NRM) defining the roles and procedures for all frontline actors who may come into contact with victims of THB, the granting of a recovery and reflection period to possible victims of trafficking, and the criminal justice response to human trafficking.

2. On the basis of GRETA’s third report, on 17 June 2022 the Committee of the Parties to the Convention adopted a recommendation to the Norwegian authorities, requesting them to inform the Committee of measures taken to comply with the recommendation within a two-year period. The report submitted by the Norwegian authorities was considered at the 34th meeting of the Committee of the Parties (21 June 2024) and was made public.²

3. On 28 June 2024, GRETA launched the fourth round of evaluation of the Convention in respect of Norway by sending the questionnaire for this round to the Norwegian authorities. The deadline for submitting the reply to the questionnaire was 28 October 2024, date on which and the authorities’ reply was received.

4. An evaluation visit to Norway took place from 2 to 6 June 2025 in order to hold meetings with relevant governmental and non-governmental actors, collect additional information and examine the practical implementation of adopted measures. The visit was carried out by a delegation composed of:

- Ms Antoaneta Vassileva, First Vice-President of GRETA;
- Mr Thomas Ahlstrand, member of GRETA;
- Ms Petya Nestorova, Executive Secretary of the Convention;
- Ms Ebru Seylan, Senior Project Officer in the Secretariat of the Convention.

5. During the visit, the GRETA delegation held consultations with relevant departments and subordinate agencies of the Ministry of Justice and Public Security, including the Police Department, the Co-ordinating Unit against Human Trafficking (KOM), the Migration Department, the Directorate of Immigration (UDI), the Department of Crime Prevention, the National Police Directorate, the National Criminal Investigation Service (KRIPOS), the National Police Immigration Service (PU), and Oslo Police Department. Meetings were also held with the Ministry of Labour and Social Inclusion (including the Labour and Welfare Administration, the National Labour Inspection Authority, and the Directorate of Integration and Diversity), the Ministry of Children and Families (including the Norwegian Directorate for Children, Youth and Family Affairs, and the National Guidance Unit for Cases of Trafficking in Children), the Ministry of Health and Care Services (including the Directorate of Health, the Norwegian Centre on Violence and Traumatic Stress Studies, and the Regional Resource Centre for Violence, Traumatic Stress and Suicide Prevention Øst), and the Ministry of Foreign Affairs. The delegation also met representatives of Human Trafficking Support Oslo (HTSO), under the City Council of Oslo, and the Service Centre for Foreign Workers (SUA) in Oslo.

² Report submitted by the Norwegian authorities on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2022)05 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings, available at <https://rm.coe.int/report-submitted-by-the-norwegian-authorities-on-measures-taken-to-com/1680b086f0>

6. In addition to holding meetings in Oslo, the delegation travelled to Bergen and Trondheim, where it met representatives of the municipal social, health and child protection services, the anti-trafficking police units of the Vest and Trøndelag Police Districts, the Support Centres for Crime Victims, the regional offices of the Directorate of Immigration, and the inter-agency centre against work-related crimes (A-Krim) in Bergen.
7. Furthermore, the GRETA delegation met representatives of the Norwegian National Human Rights Institution (NIM), which has recently been assigned the role of National Rapporteur on THB.
8. The GRETA delegation held separate meetings with representatives of non-governmental organisations (NGOs) and trade unions, lawyers representing victims of trafficking, and the International Organization for Migration (IOM).
9. In the course of the visit, GRETA's delegation visited two shelters (safe houses) for victims of trafficking in Oslo (Laura's House, for women, run by the Church City Mission, and Filemon, for men, run by the Salvation Army), the Trandum Police Immigration Detention Centre, and the Vikhammer Asylum Centre in Trondheim.
10. The list of the national authorities, NGOs and other organisations with which the delegation held consultations is set out in Appendix 2 to this report. GRETA is grateful for the information provided by them.
11. GRETA wishes to place on record the co-operation provided by the Norwegian authorities and in particular by the contact person appointed to liaise with GRETA, Mr Jan Austad, Senior Advisor in the Police Department of the Ministry of Justice and Public Security.
12. The draft version of the present report was approved by GRETA at its 55th meeting (17-21 November 2025) and was submitted to the Norwegian authorities for comments. The authorities' comments were received on 6 February 2026 and were taken into account by GRETA when adopting the final report at its 56th meeting (2-6 March 2026). The report covers the situation up to 6 March 2026; developments since that date are not taken into account in the following analysis and conclusions. GRETA's conclusions and proposals for action are summarised in Appendix 2.

II. Overview of trends and changes in the legislative, institutional and policy framework for action against human trafficking

13. Norway remains primarily a destination country for victims of human trafficking, but there have also been several Norwegian nationals identified as victims in the reporting period. In the continuing absence of a National Referral Mechanism (NRM) for the identification and referral to assistance of victims of trafficking, there is still no formal and systematic data collection on the number of identified victims of trafficking in Norway. The annual status reports on THB in Norway, issued by the National Co-ordinating Unit against Human Trafficking (KOM), provide statistics on various measures taken in respect of victims of THB, such as the issuance of residence permits and support measures provided by different organisations. However, KOM does not have a basis for calculating the actual number of individuals who have benefited from the reported measures, as some victims may have benefited from multiple support measures. In 2024, a total of 183 adult presumed victims of trafficking (135 women, 41 men and 7 transgender) received assistance through accommodation and follow-up measures.³ Of these, 107 were newly identified in 2024, while 76 were followed up from previous years. The majority of the victims were subjected to sexual exploitation (110), followed by forced labour or services (56). The victims originated primarily from Latin America (72), Africa (41), Eastern Europe (33) and Asia (23). The statistics on assisted presumed adult victims of THB in previous years, which do not correspond to the actual numbers of persons identified as victims of THB in the respective year, were 216 in 2023,⁴ 176 in 2022,⁵ and 197 in 2021⁶ (see Table 1 for detailed statistics). According to KOM's estimates, around 100 adult persons were identified as new victims annually in the period 2022-2024. As regards children, in 2024, 8 were placed on various measures on the basis of the Child Welfare Act, where there was a suspicion that the child had been, or could be, exploited in human trafficking (see paragraph 84). Reiterating the recommendations made in its previous reports, GRETA considers that the Norwegian authorities should establish a comprehensive system for collecting data on victims of THB, broken down by sex, age, nationality, type of exploitation and country of origin/exploitation.

14. As regards emerging trends of trafficking in human beings in Norway, there has been an increase in the number of young women from Latin American countries (mostly Colombia), as well as transgender women from Colombia and Venezuela, who arrive in Norway, usually via Spain, on three-month visas; they appear to be controlled by criminal groups and are moved around rented flats where they provide sexual services that are advertised via commercial websites or social media platforms. Further, the recruitment of children and young people into criminal activities is a growing trend. Online platforms are increasingly being used as tools for recruitment and exploitation. There has also been an increase in the number of identified Norwegian victims, including children subjected to sexual abuse through digital platforms (see paragraphs 157 and 158). There are indications that labour exploitation of migrant workers is taking place in various economic sectors, in particular agriculture, construction, food deliveries, fisheries, hospitality, transport, car repair and cleaning services.

15. The legislative framework relevant to combating THB has undergone several changes since the third GRETA report. The Child Welfare Act was amended in 2023 (see also paragraph 84) and the previous section 4-29 concerning the temporary placement of child victims of THB in institutions was split into two new sections: 4-5 (emergency placement in an institution of children at risk of THB) and 6-6 (long-term placement).

³ See KOM annual status report 2024, available in Norwegian at: <https://www.politiet.no/globalassets/rad-og-veiledning/menneskehandel/kom-tilstandsrapport-2024.pdf>

⁴ See KOM annual status report 2023, available in Norwegian at: <https://www.politiet.no/globalassets/rad-og-veiledning/menneskehandel/kom-tilstandsrapport-2023.pdf>

⁵ See KOM annual status report 2022, available in Norwegian at: <https://www.politiet.no/globalassets/rad-og-veiledning/menneskehandel/kom-tilstandsrapport-2022.pdf>

⁶ See KOM annual status report 2021, available in Norwegian at: <https://www.politiet.no/globalassets/rad-og-veiledning/menneskehandel/rapport-fra-koordineringsenheten-for-ofre-for-menneskehandel-2021.pdf>

16. On 1 January 2022, the new criminal offences of wage theft⁷ (section 395 of the CC) and gross wage theft (section 396 of the CC) came into force.⁸ Further, amendments to the Working Environment Act entered into force in 2024, including, *inter alia*, changes to the procedures for terminating employment, the right to holiday pay, and the description of the daily and weekly working hours, as well as clarifying the difference between employment and self-employment.

17. The new Act on Compensation for Victims of Violent Crimes, which entered into force on 1 January 2023, introduced changes to the conditions for obtaining state compensation (see paragraph 189).

18. In 2024, a legislative committee appointed by the Norwegian government produced a green paper (NOU 2024:13) entitled “Law and Freedom - Negative Social Control,⁹ Honor-Motivated Violence, Forced Marriage, Female Genital Mutilation, Psychological Violence, and Involuntary Stays Abroad – Legal Issues and Proposals for Regulatory Changes” (see also paragraph 89). The committee assessed whether current legislation provides adequate legal protection for children and young people and proposed several regulatory changes, including amendments to the Child Welfare Act and adding child and forced marriage to the forms of exploitation in the criminal offence of THB in section 257 of the CC. In December 2025, the Norwegian Parliament adopted amendments to the Child Welfare Act which include travel bans for children at risk of harmful stays abroad, including in situations associated with negative social control, honour-motivated violence and forced marriage, and establish strengthened information-sharing between child welfare services, the police and immigration authorities, criminal liability for breaches of travel bans, and limitation on the issuance of passports and national ID cards in such cases. Other proposals, including the one concerning section 257 of the CC, remain under assessment.

19. The institutional framework for action against THB has undergone certain changes and will further evolve, following the publication of a new National Strategy against Human Trafficking on 28 May 2025 (see paragraph 22). In December 2023, KOM was administratively moved from the National Police Directorate to the Ministry of Justice and Public Security. The Inter-ministerial Working Group against Human Trafficking, which is chaired by the Ministry of Justice and Public Security, held several meetings, starting in June 2024, to prepare the new National Strategy. Following the launch of the Strategy at the end of May 2025, the Inter-ministerial Working Group has discussed mandates and work plans for the new co-ordination structures proposed in the Strategy.

20. The new National Strategy against Human Trafficking, which includes as a priority area strengthening of co-ordination and co-operation between different stakeholders, envisages the setting up of a directorate-level group, led by the Secretariat for the National Mediation Services (NMS) under the Ministry of Justice and Public Security's Department of Crime Prevention.¹⁰ The purpose of this group will be to enhance co-operation between different stakeholders in the provision of competence-building, preventive measures and assistance to victims, and to support the work of the Inter-departmental Working Group. In their comments on the draft GRETA report, submitted in February 2026, the Norwegian authorities stated that the NMS had recently recruited new staff members who will start working on the tasks related to THB. With time, KOM's responsibilities will be integrated into the NMS and further developed. The new Strategy envisages the development of a cross-sectoral co-operation forum (led by the Ministry of Justice and Public Security in collaboration with the Secretariat of the NMS) with the aim of ensuring structured involvement in the work processes related to the implementation of the Strategy.

⁷ The concept of wage theft encompasses a number of acts in which the employer unjustly enriches him/herself from the salary or other remuneration to which the employee is entitled under an agreement, law or regulation. Examples of wage theft are wage deductions in violation of section 14-15 of the Working Environment Act, failure to pay overtime or wages below generalised minimum wage rates, or failure to pay holiday pay. The penalty is a fine or imprisonment for up to two years for wage theft or up to six years for gross wage theft.

⁸ [Wage Theft: A Deep Dive into Sections 395 and 396 of the Penal Code | Sterk Law Firm](#)

⁹ Negative social control is understood as pressure, surveillance, threats, or coercion that systematically restricts someone's life choices or repeatedly prevents them from making independent decisions about their life and future.

¹⁰ National Strategy against Human Trafficking, p. 26, available in Norwegian at:

<https://www.regjeringen.no/no/dokumenter/nasjonal-strategi-mot-menneskehandel-2025-2030/id3103576/>

21. In March 2025, the Norwegian National Human Rights Institution (NIM) was assigned the role of independent National Rapporteur on THB, Violence against Women and Domestic Violence. GRETA was informed that an initial budget of NOK 3.6 million (311 000 Euros) was allocated to employ two staff to work on this new role, and there are plans to increase their number to four and the budget to NOK 5.6 million (482 000 Euros) by 2028. GRETA welcomes the designation of the Norwegian Human Rights Institution as an independent National Rapporteur on human trafficking and invites the authorities to ensure that it is provided with adequate resources and access to relevant information to enable it to fulfil its duties.

22. In its third report on Norway, noting that the last National Action Plan against THB had been adopted in 2016, GRETA stressed the importance of adopting a comprehensive strategy or action plan against THB which addresses new trends. A new National Strategy against Human Trafficking for the period 2025-2030 was launched on 28 May 2025, shortly before GRETA's visit.¹¹ It is structured around four priority areas, each with corresponding main objectives and a set of measures: 1. comprehensive and co-ordinated national effort; 2. prevention; 3. assistance and protection; and 4. prosecution. The Strategy refers to the obligations under the Council of Europe Anti-Trafficking Convention and to previous GRETA recommendations. Five ministries - the Ministry of Justice and Public Security, Ministry of Labour and Social Inclusion, Ministry of Children and Families, Ministry of Health and Care Services, and Ministry of Foreign Affairs - are responsible for implementing the 18 measures outlined in the Strategy. NGOs were consulted during the preparation of the new Strategy and will be involved in the implementation of some of the measures. Further, an independent evaluation of the implementation of the Strategy is envisaged. GRETA welcomes the adoption of the National Strategy against Human Trafficking and invites the Norwegian authorities to ensure that it is supported by the necessary resources to ensure its implementation.

23. Furthermore, in Trondheim, GRETA was informed of the adoption of a local plan of action against THB, based on the new National Strategy, and the setting up of an interdisciplinary working group involving a wide range of stakeholders.

III. Addressing vulnerabilities to trafficking in human beings

1. Prevention of trafficking in human beings

a. Introduction

24. Prevention is crucial in combating trafficking in human beings. Article 5 of the Convention therefore requires States Parties to establish and/or strengthen effective policies and programmes to prevent THB in co-ordination between relevant public agencies, non-governmental organisations and other elements of civil society. Such policies should have a particular focus on persons vulnerable to trafficking and professionals concerned with trafficking in human beings, and shall include research, information, awareness-raising and education campaigns, social and economic initiatives and training programmes. In the development and implementation of prevention measures, States Parties are required to promote a human rights-based approach and to use gender mainstreaming and a child-sensitive approach, taking specific measures to reduce children's vulnerability to trafficking. Furthermore, Article 5 of the Convention requires States Parties to take measures to enable migration to take place legally. In addition, Article 6 of the Convention places a positive obligation on Parties to adopt measures to discourage the demand that fosters all forms of exploitation of persons which leads to trafficking.

¹¹ Available in Norwegian at: <https://www.regjeringen.no/no/dokumenter/nasjonal-strategi-mot-menneskehandel-2025-2030/id3103576/>

25. According to the Norwegian authorities, foreign women in prostitution in Norway are exposed to many vulnerabilities. At a round table organised by the Ministry of Justice and Public Security in October 2024, the authorities and civil society discussed the situation in the prostitution market. There was general agreement that the personal, situational and contextual situation of foreign women in prostitution places them in the highest position of vulnerability. Consequently, the new National Strategy against Human Trafficking includes as a priority measure to identify and assist victims exploited in prostitution.

26. Furthermore, in research and analysis of what makes people vulnerable to THB in Norway, migrant workers are identified as a vulnerable group. This particularly concerns workers in labour-intensive and lower-skilled sectors, such as agriculture, construction, fishing, cleaning, hospitality and transport.¹² These sectors are considered as being at higher risk due to their precarious nature with a large turnover of staff, short-term contracts and seasonality. Further, the gig economy, in particular food delivery platforms, has been identified as a high-risk area. Persons facing economic hardship, social marginalisation and unstable immigration status are particularly vulnerable. Cases of severe exploitation of asylum seekers and irregular migrants have been identified in sectors such as car wash, smaller scale produce growers selling to markets, massage parlours and illicit marijuana production.¹³

27. Research on the vulnerability of children to THB was conducted by the Institute for Social Research in 2022.¹⁴ One of the main findings of the study is that human trafficking is generally considered a separate and marginal phenomenon. Children and young people who become entangled in coercion and dependency relationships through drug-related crime, (threats of) forced marriage or sexual abuse, rarely have their cases assessed as potential human trafficking. The study argues that a broader approach to the exploitation dynamics in these cases, where coercion, violence and dependency are part of the picture, could provide a more consistent and knowledge-based foundation for government efforts. A growing concern is child criminal exploitation. Several police districts have seen an increase in the recruitment of children into criminal networks, in particular in neighbourhoods with a high percentage of vulnerable youth.¹⁵ Some of the tactics being used are getting the children and youth into debt, so that they have to work to pay back, or the criminal networks glorifying a criminal lifestyle as a way to recruit.

28. As mentioned in paragraph 22, one of the priority areas of the new National Strategy is to achieve effective prevention through knowledge of emerging trends, strengthened capacity among services, and targeted risk-reduction measures. This includes the further development of guidance, practical tools and co-operation procedures, as well as effective information measures to target the general public and individuals who purchase sex or make use of illegal labour or services that may involve exploitation. However, civil society organisations met by GRETA noted that the National Strategy lacked a stronger focus on targeted and sustained funding for preventive initiatives.

29. Moreover, GRETA emphasises the need to include the lived experiences and perspectives of victims and survivors in the design and evaluation of anti-trafficking policies. In this regard, GRETA invites the Norwegian authorities to set up a trafficking survivors' advisory council. Reference is made in this context to the ODIHR Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils¹⁶ and ICAT's Issue Brief on Ensuring Ethical Survivor Inclusion.¹⁷

¹² Haapasaari, S., Davis, T., Lietonen, A., Ollus, N., Jokinen, A., Pekkarinen, A.G., Risberg, M., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*, HEUNI Report Series No. 109, 2024, available at: <https://heuni.fi/-/report-series-109-exploited-migrant-workers-access-to-remedy-in-the-baltic-sea-region#26b45988>;

Brunovskis, A. and Ødegård, A.M., *Grov utnytting av utenlandske arbeidere*, Fafo, 2022, available at: <https://www.fafo.no/en/publications/grov-utnytting-av-utenlandske-arbeidstakere>

¹³ Davis, T., *Rekruttering av migrantarbeidere, en studie fra norsk matproduksjon*, Kinginstituttet, 2023, available at: https://kinginstituttet.no/wp-content/uploads/2023/08/Rapport_A4_digital.pdf

¹⁴ Hilde Lidén, *Children, human trafficking, and related forms of exploitation (Barn, menneskehandel og nærliggende utnyttingsformer)*, Institute for Social Research, September 2022.

¹⁵ Politiets trusselvurdering 2025 (Police threat assessment 2025). <https://www.politiet.no/globalassets/tall-og-fakta/politiets-trusselvurdering-ptv/politiets-trusselvurdering-2025.pdf>

¹⁶ OSCE/ODHIR, *Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils (NSTACs)*, 2024.

¹⁷ ICAT, *Ensuring Ethical Survivor Inclusion*, Issue Brief, 2025.

b. Measures to prevent the vulnerability of specific groups to trafficking in human beings

30. This section examines the preventive measures taken with regard to certain vulnerable groups based on the information provided by the Norwegian authorities as well as non-state actors. GRETA underlines that not every individual belonging to one of these groups is vulnerable to human trafficking *per se*, as there are usually additional vulnerability factors involved. The different groups selected should be viewed with due regard to the complexity and intersectionality of vulnerabilities to trafficking.

i. *Vulnerabilities of persons engaged in prostitution and related to the gender dimension of human trafficking*

31. As noted in paragraph 25, the Norwegian authorities consider that the personal, situational and contextual situation of foreign women in prostitution places them in the highest position of vulnerability. The majority (around 75-80%) of persons providing sexual services in Norway are migrants. Most of them are women, but there are also transgender persons and men. Prior to the COVID-19 pandemic, the majority of them originated from Eastern Europe (Bulgaria, Romania, Ukraine, Russia) and Nigeria. Subsequently, the number of young women from Latin America (Colombia, Brazil, Venezuela, Chile) has increased. There is no evidence of a significant increase in victims of THB amongst Ukrainian nationals following the full-scale invasion of Ukraine by Russia.

32. The National Strategy indicates that prostitution occurs primarily in rented flats and massage parlours through advertisements on commercial websites and social media. Prostitution networks target people in vulnerable situations, exploiting dependency relationships, putting victims in a debt situation or using other means of control. The clandestine nature of prostitution and lack of access to welfare services and programmes that could improve their situation places migrants who provide sexual services in a vulnerable and precarious position. Many of them stay for short periods of time in Norway, in short-term rental accommodation, and are not registered in the Norwegian national insurance scheme (*folketrygden*) which entitles them to access to health care and welfare services. According to research, the main driving factor for their migration is relative or absolute poverty, interacting with individual factors – discrimination, racism, domestic violence or difficult family circumstance. Sexual minority status is an additional vulnerability factor. Interviews with 11 trans women providing sexual services (of whom 8 originated from Latin America) found that in their countries of origin they had suffered extreme discrimination, violence, threats and lack of job opportunities, selling sex or working as a hairdresser being the only options for earning a living.¹⁸

33. Pro Sentret, Oslo Municipality's dedicated support centre for individuals involved in the exchange of sexual services, functions as Norway's national expert hub on prostitution issues. The centre offers low-threshold, accessible services such as health care, legal aid and social counselling, emotional support and practical assistance, available both in person and online. With the decline of street prostitution, escort websites and platforms such as Telegram, Snapchat, Grindr, X and Instagram are being used to advertise sexual services. Pro Sentret's outreach teams contact people providing sexual services via these platforms and offer information and assistance. The anti-THB police units also monitor platforms advertising sexual services in order to build an intelligence system. According to Pro Sentret, there is increased violence against persons selling sexual services, who often do not report it to the police for fear of deportation. In many investigations, the offence is reportedly qualified as pimping rather than THB, depriving victims of access to residence permit, legal aid and compensation (see also paragraph 165).

¹⁸ Ida Kock, Jose Colmenares Ranes and Victoria Mumuni, *In Transit: Migrants Who Sell Sex in Norway*, Pro Sentret, 2023.

34. In a study published by Pro Sentret in 2023, based on interviews with 41 migrants providing sexual services in Norway (including 11 trans women and 8 men),¹⁹ the vulnerabilities of such persons were mapped.²⁰ The study examined, *inter alia*, if they had experiences with human trafficking. Three of the 41 interviewed persons (one woman and two transwomen, all from Latin America) were identified as being victims of THB. For two of them, the trafficking situations dated back to the 1990s when they were children and started being exploited in their countries of origin. The third one (a trans woman) had a more recent THB experience. According to the information provided by her, a “mafia group from Russia/Ukraine/Belarus” facilitated her transport and accommodation in flats in different cities in EU countries. She arrived in Norway irregularly, worked for about a month for the traffickers in several flats in Oslo before being put in contact with Pro Sentret and starting to receive assistance from ROSA. The study notes, however, that the low number of identified victims of THB amongst the sample does not provide an accurate estimation of the actual number.

35. There has been an increase in underage girls and boys selling sexual services online (see also paragraph 177). According to a report published by Pro Sentret in 2023, based on a survey of 190 young adults (139 women, 24 men, 13 non-binary) who had experience of selling or exchanging sexual services before the age of 18, vulnerability factors include poverty, belonging to a national minority, mental health problems, substance abuse, neurodiversity (i.e. having ADHD or an autism spectrum diagnosis), being in child welfare care and gender identity.²¹

36. The Integration Act, which came into force in 2021, aims to integrate foreigners into Norwegian society by enabling them to gain Norwegian language skills and knowledge about Norwegian society, and helping them to become financially independent. Recognising the low employment rates among refugee women, the government launched the programme “Jobbsjansen”,²² designed to help immigrant women gain qualifications to secure long-term employment and gain financial independence. This programme also plays an important role in preventing negative social control and exploitation. Participation is voluntary and can last up to four years, depending on the skills participants wish to acquire. Many of the women involved lack basic digital skills and often rely on family or their social networks to navigate job opportunities, making the programme vital for building independence and employability. In 2024, 1 100 immigrant women took part, and over the past five years, 75% of participants entered the labour market directly after completion. Participants also receive a taxable financial benefit of approximately NOK 130 000 (11 000 Euros) per year.

37. GRETA considers that the Norwegian authorities should take further steps to reduce the vulnerability of persons engaged in prostitution to human trafficking, in particular by:

- raising awareness among this group of the risks of human trafficking and the support services available to victims;
- developing exit programmes for persons wishing to leave prostitution;
- further supporting migrant, refugee and asylum-seeking women to access vocational training, education and employment;
- developing targeted digital safety and prevention initiatives for young people.

¹⁹ The sample included six persons considered to be particularly vulnerable: five Roma women who had suffered discrimination and racism in their countries of origin, and an 18-year-old man.

²⁰ Ida Kock, Jose Colmenares Raner and Victoria Mumuni, *In Transit: Migrants Who Sell Sex in Norway*, Pro Sentret, 2023.

²¹ Luca Dalen Espseth, *What am I worth? Young people's experiences with selling and exchanging sexual services*. Pro Sentret, 2023.

²² For more information on the programme, see <https://www.imdi.no/tilskudd/tilskudd-offentlige-virksomheter-kommuner-og-fylkeskommuner/jobbsjansen/>

ii. Migrant workers

38. As noted in paragraph 26, migrant workers, in particular those with unstable or irregular immigration status, are vulnerable to THB and exploitation, mainly labour-intensive and lower-skilled sectors and seasonal work. Their vulnerability is exacerbated by their lack of knowledge of Norwegian language, law and support services. The authorities have identified several sectors as being at risk of exploitation and human trafficking where various control methods, violations of laws and regulations and the use of facilitators are used as part of the exploitation. These sectors include construction, fisheries, vessels, transport, catering, car repair/care and cleaning services.²³ Exploitation involves situations where freedom and scope of action are controlled by others, workers are pressured to work without pay (wage theft) or become victims of digital ID theft. Experience-based tourism is described as a relatively new and rapidly growing industry, especially in Northern Norway. In this sector, individuals are often expected to provide unpaid labour in exchange for nature-based experiences. Cases of severe exploitation of asylum seekers and irregular migrants have been identified in sectors such as illicit marijuana production,²⁴ car wash, smaller scale produce growers selling to markets, and massage parlours.

39. According to the NGO Fair Play Bygg Norge (FPBN), an umbrella organisation supported by trade unions and employers' organisations focusing on work-related crime, there is a growing tendency of segments of organised crime establishing themselves in the labour market, particularly in the construction industry and other labour-intensive industries. These groups commit profit-driven crimes through violations of both labour law and the CC. Norwegian society is highly digitalised, which results in new methods of exploitation, whereby criminal actors engage in the trade of digital IDs from workers, refugees and other people in precarious situations. In cases of digital ID-theft, perpetrators misuse the victims' electronic ID after stealing it or gaining access to it through coercion or control and use it to register people as heads of boards or CEOs of companies which apply for credit, and when the subsequent invoices are not paid, the victims become legally liable for the ensuing debt. To give their operations an appearance of legitimacy, the perpetrators create fake official documents such as contracts, employment records and company registrations. They establish "shell" companies that exist only on paper, without a real address, which makes it difficult for the authorities to investigate. In some cases, official records show only one legal employee while many others work illegally under threats, reflecting the structured and large-scale nature of these networks. FPBN has also observed cases of non-EEA seasonal workers in primary industries having their passports withheld by employers. The victims are afraid to report to the police due to fear of deportation. The organisation regularly submits tips to the authorities regarding cases of ID theft and wage theft, many of which show indicators of human trafficking. In the Oslo region alone, FPBN reported 55 cases of wage theft in 2024, with a further 29 cases recorded in the first five months of 2025. However, most of these cases are reportedly not investigated.

40. Service Centres for Foreign Workers (SUA) have been set up in Oslo, Trondheim, Stavanger and Bergen for the mandatory registration of foreign workers upon their arrival in Norway. The Tax Administration, the Police and the Labour Inspection Authority collaborate through the SUA to deliver coordinated services for newly arrived foreign workers and provide them with information on their rights and potential risks. Foreign workers are issued with an electronic ID which is essential for accessing various services. At the SUA in Oslo, staff are recruited from diverse backgrounds, enabling communication in up to 20 languages. In addition to verifying documents and issuing work permits, SUA staff provide information about workers' rights and collect relevant details that may indicate exploitation. Common issues identified include falsified education documents or contracts and overcrowded and poor living conditions. To verify the authenticity of documents and contracts, SUA employs open-source intelligence techniques and collaborates with the Labour Inspection Authority, which inspects workplaces to assess actual conditions. In urgent cases, SUA contacts the police directly.

²³ National Strategy against THB (2025-2030).

²⁴ Davis, T., *Rekruttering av migrantarbeidere, en studie fra norsk matproduksjon*, Kinginstituttet, 2023, available at: https://kinginstituttet.no/wp-content/uploads/2023/08/Rapport_A4_digital.pdf

41. GRETA was informed that SUA staff in Oslo detected indicators of possible THB involving seasonal workers from Vietnam²⁵ employed on farms and chefs recruited from countries such as India and Nepal. In one case, information shared by two men at the SUA triggered a major investigation spanning five to six locations. SUA staff has also encountered cases involving vulnerable women from both EU and non-EU countries, particularly from South America. Many present falsified work contracts claiming employment in warehouses, customer service or offices. Based on its findings, SUA may flag such cases as potential trafficking to the police. However, the women are usually afraid or reluctant to talk to the police and in such cases, SUA staff may contact ROSA for follow-up support.

42. The Norwegian Labour Inspection Authority has a human trafficking team within the Department for Work-Related Crime whose mandate is to detect indicators of human trafficking and forced labour in the workplace, maintain contact with the human trafficking teams in the police districts as well as with NGOs to whom potential victims of THB are referred for assistance, and raise awareness of human trafficking among all labour inspectors. The team has nine contact persons, each responsible for a regional area, and one co-ordinator. Particular attention is paid to cleaning, hospitality, construction, car washing, seasonal work in agriculture (e.g. berry picking), digital platforms (e.g. Wolt couriers) and other grey areas in the labour market. The team reports possible cases of THB to the police and provides evidence gathered through labour inspections to support investigations. Action cards for the work against trafficking have been developed by the contact persons and are available to all labour inspectors. The actions cards include the definitions of human trafficking and labour exploitation, the sectors most at risk, indicators of THB, the rights and assistance available to victims, and information on whom to contact in case of detecting possible cases.

43. The inspections conducted by the Labour Inspection Authority target social dumping, work-related crime and occupational safety and health. Inspections can be both announced and unannounced. The Labour Inspectorate offers the option to report grievances anonymously on its website. Labour inspectors have established contacts within local police departments, and when potential cases of trafficking are identified, they immediately co-ordinate with law enforcement to ensure appropriate follow-up. Certain areas pose specific challenges for labour inspections. For example, in the consumer market for cleaning services, inspectors are unable to enter private homes. Similarly, when inspecting farms, they can only access the work areas and are not permitted to enter the farmhouse. This is especially relevant in Norway, where many farms are small-scale. Inspecting agriculture is also geographically difficult, with few inspections taking place in remote areas. According to the Norwegian authorities, there were more than 700 inspections in fisheries in the last five years.

44. GRETA was informed that there were 354 labour inspectors who conducted a total of 12 890 inspections in 2024, of which 5 356 were on social dumping and work-related crime.²⁶ Of 1 800 inspections in 2023 that focused on wage theft and indecent working conditions, violations were discovered in 630 of the inspected companies.²⁷ The number of inspections which resulted in suspected cases of THB being detected is unknown, but GRETA was informed that the Labour Inspection Authority was in the process of developing a system for registering such cases. In their comments on the draft GRETA report, the authorities indicated that as of 2026, a manual system has been established for the registration of cases of suspected human trafficking. The Labour Inspection Authority's designated contact persons for THB register such cases and report them to the co-ordinator maintaining a central register.

²⁵ Vietnamese nationals represented the largest labour immigration group in 2025. [Innvilgede arbeidstillatelser for tredjelandsborgere etter statsborgerskap og type tillatelse \(2025\) - UDI](#)

²⁶ The total number of inspections in previous years was 12 972 in 2023 and 12 128 in 2022.

²⁷ NRK, *Puberier etter historisk dom: Aldri mer*, 2023, available at: <https://www.nrk.no/ostfold/eier-av-spisested-i-askim-er-den-forste-som-er-domt-for-lonnstyveri-1.16593207>

45. As noted in paragraph 16, the offences of wage theft and gross wage theft came into force in 2022, and the Working Environment Act was amended in 2024. However, GRETA was informed that the latter was not backed by additional resources to ensure its proper implementation. In their comments on the draft GRETA report, the authorities stated that the budget of the Labour Inspection Authority, which is responsible for the supervision of the enforcement of the Working Environment Act, was increased by 90 million NOK (approximately 7.9 million Euros) in 2022-2025 and by 25 million NOK (approximately 2.2 million Euros) in 2026. The authorities also stated that new amendments to the Working Environment Act introduced in 2025 gave the Labour Inspection Authority possibilities to use stronger sanctions.

46. GRETA notes that there are several problematic areas which would require further legislative changes to prevent cases of trafficking in human beings. Labour inspectors are only allowed to inspect housing provided by the employer. However, there are cases where middlemen who operate as recruiters and supervisors for businesses organise accommodation for seasonal workers, sometimes in dire conditions (e.g. sleeping in green houses, renting mattresses on the floor, sharing tiny rooms, or renting housing from people connected to the recruitment facilitator where they are made to clean the house in addition to performing their job for long hours at farms), the rent often being deducted directly from the worker's wages, at exorbitant prices.²⁸ This situation is technically seen as the workers themselves organising the housing and is therefore not covered by the Working Environment Act and the labour inspectors' mandate. The Labour Inspectorate has identified at least 45 illegal living conditions related to accommodation in agriculture over the last six years. In their comments on the draft GRETA report, the authorities indicated that the Labour Inspection Authority has the legal authority to consider the real situation and take appropriate action. A new Chapter 3A in the Regulations on Workplaces and Accommodation entered into force in the summer of 2024, specifically addressing several legislative issues. In sectors covered by generally applicable minimum wages,²⁹ the Labour Inspection Authority can act against unreasonably high rental prices where the employer deducts the rent directly from the worker's wages, which can effectively prevent the payment of the minimum wage. However, in sectors not covered by minimum wages, the Labour Inspection Authority does not have direct enforcement powers regarding wage deductions. Furthermore, GRETA notes that the Labour Inspection Authority's powers may still not be applicable to private accommodation organised by recruiters and supervisors.

47. Despite the provisions of the Working Environment Act, seasonal workers are not paid every month, but rather at the end of the season, which makes them particularly vulnerable and dependent on their employers and/or intermediaries.³⁰ It is also very difficult for exploited workers to access remedies for wage theft under the current system. When the Labour Inspectorate fines a company for wage theft, the money goes to the state and not to the affected worker. If their case is dropped by the police, they can try going through the Conciliation Court (civil courts), but the process is very complicated and time-consuming. There are several hindrances, such as absence of free legal aid unless the worker's contract was unlawfully terminated; the need for the claimant to file a case personally, which requires good knowledge of the system and language skills; the burden of proof is on the claimant, who may never have had access to the necessary documents, such as contracts, time sheets, etc.; a decision in favour of the migrant worker can be appealed by the employer; and even claimants who succeed with their claim rarely receive the full amount owed and have to settle with less.³¹ Being in the situation of having experienced wage theft and seeking access to remedy can further exacerbate vulnerability of migrant workers due to being sent around from agency to agency in pursuit of information and clarity. Many leave Norway without

²⁸ Aftenposten, «Onkel» Le, 25 January 2025, <https://www.aftenposten.no/norge/i/lwvOxy/underbetaling-frykt-og-daarlige-boforhold>

²⁹ Norway has legal rules for minimum wages in nine sectors: construction, electrical work, fish processing, freight transport by road, agriculture and horticulture, hospitality, passenger transport by tour bus, cleaning, and maritime construction.

³⁰ https://www.aftenposten.no/norge/i/aJ1m04/roedt-lederen-mener-aftenpostens-funn-er-grusomme-trengs-ekstraordinaere-tiltak?utm_source=chatgpt.com

³¹ Haapasaari, S., Davis, T., Lietonen, A., Ollus, N., Jokinen, A., Pekkarinen, A.G., Risberg, M., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*, HEUNI Report Series No. 109, 2024, available at: <https://heuni.fi/-/report-series-109-exploited-migrant-workers-access-to-remedy-in-the-baltic-sea-region#26b45988>

being able to access remedy due to lack of financial means to survive while the process is ongoing and visa expiry for seasonal workers.³²

48. The Norwegian Labour and Welfare Administration (NAV) has a mechanism enabling migrant workers to apply for unpaid wages, the so-called wage guarantee. However, it can take up to 18 months to receive a payout, which can increase a person's vulnerability while waiting and lead them to take loans to survive and accumulate debt, depend on others for housing, and accept indecent work. It is also difficult to provide proof of wage theft or unlawful termination. A modus of exploitation in recent years has also been to have migrant workers become self-employed on paper even though they are in a regular employment relationship. This group of migrant workers are not eligible for wage guarantee payments. Civil society organisations suggest an expanded wage guarantee system where the State takes over the recovery of wage claims as well as revising the process of seeking remediation for wage theft through the civil court in a way that makes it accessible and more user friendly. There are also issues related to companies becoming insolvent as a way to circumvent paying wages as well as issues with unlawful termination of contracts that often leaves migrant workers without getting the wages they are due. Without sentences, the offences of wage theft and gross wage theft fail to serve as a preventative measure or to provide adequate remediation for migrant workers affected by crime.

49. Problems related to contracts have been identified with seasonal workers, particularly in agriculture. Although they can be recruited, housed and managed by persons often from the same ethnic background who speak their language, their contracts and visas indicate that the workers are employed by the farmers. Workers in these situations often do not know who they work for and think that it is the supervisor who is their boss as this person may keep their identity papers, control their shifts and timesheets, flight tickets and bank accounts.³³

50. Temporary work agencies are required to comply with specific conditions regarding employment contracts, safety and occupational injury insurance in order to be approved and registered by the Labour Inspection Authority. However, as the recruitment of migrant workers often happens transnationally, regulating employment and recruitment agencies based in Norway fails to prevent vulnerability to or exploitation of migrant workers. A study on recruitment of migrant workers linked to exploitation, which focused on Norwegian food production, found several weaknesses in the current system that can render workers more vulnerable to exploitation. Of the 19 migrant worker informants participating in the study, only five had not paid recruitment costs or fees (the highest sum a migrant worker paid for a job as a seasonal worker in Norway was USD 5 000) and four were recruited by middlemen and facilitators. Many of the migrant workers had entered agreements at the start of the recruitment phase in their home country that were not kept when the employment began in Norway. Some workers were given contracts in a language they did not understand, some got double contracts, and some did not get a contract at all. Fourteen of the 19 migrant workers experienced wage theft.³⁴ In their comments on the draft GRETA report, the Norwegian authorities referred to section 26 of the Labour Market Act, which provides that an enterprise running a private employment agency cannot demand payment from the jobseeker for the placement service. However, GRETA notes that the recruitment of migrant workers often occurs in the home country or through digital recruitment platforms operating in other countries, which limits the applicability of section 26 of the Labour Market Act. Norway has not ratified ILO Convention No. 181 (Private Employment Agencies Convention). The authorities have also referred to section 14-15 of the Working Environment Act, which stipulates that deductions cannot be made from wages or holiday pay, except for when authorised by law, in respect of pension schemes, when stipulated in advance by a written agreement, when provided by a collective pay agreement to pay trade union contributions, in respect of compensation for damage or loss caused willfully or by gross negligence by the employee, or due to work stoppages or lockouts.

³² Ibidem.

³³ Davis, T., *Rekruttering av migrantarbeidere, en studie fra norsk matproduksjon*, Kinginstituttet, 2023, available at: https://kinginstituttet.no/wp-content/uploads/2023/08/Rapport_A4_digital.pdf

³⁴ Ibidem.

51. The Directorate of Immigration (UDI) may decide not to grant a residence permit for the performance of work to employers who have committed serious or repeated violations of wage and overtime pay conditions, with a view to protecting employees from exploitative employers (Immigration Act, section 27, paragraph 5). Such a decision applies for a period of two years (“quarantine”). However, according to media reports, the UDI does not impose “quarantine” for violations other than wage-related issues and only five companies that have brought in seasonal workers to the agriculture sector have reportedly been quarantined in the last 10 years.³⁵ The Norwegian authorities have also indicated that, on the basis of the Working Environment Act, the Labour Inspection Authority supervises whether businesses comply with the conditions for residence permits and, in case of breaches, notifies the immigration authorities. In this context, GRETA stresses the importance of effective “firewalls” between labour inspections and immigration enforcement.

52. According to KOM’s annual status report on THB for 2024, a number of false jobs offers were detected among Vietnamese seasonal workers who were supposed to work in agriculture. Based on this experience, the UDI contacted employers to check the authenticity of the job offers in all applications for seasonal work from Vietnam for 2024, but did not find any false job offers. In 2025, the newspaper *Aftenposten* published a series of articles on recruitment, work and living conditions of seasonal workers in agriculture which researched recruitment networks, particularly with links to Vietnam. By linking company names with data from the Labour Inspectorate’s data from inspections, the newspaper found that 322 companies have since 2014 violated labour laws when hiring and employing seasonal workers. These companies have been granted 12 775 seasonal worker permits by the UDI. Of the 322 companies, 43 were given fines by the Labour Inspectorate and five were imposed quarantines.³⁶ In their comments on the draft GRETA report, the Norwegian authorities pointed out that following the detection of false job offers amongst Vietnamese seasonal workers who were supposed to work in agriculture in 2022, the UDI started contacting employers to check the authenticity of job offers in all applications for seasonal work from Vietnam. The authorities also stated that the UDI has not discovered false job offers in 2023-2025.

53. There are eight A-Krim centres operating across Norway (located in Oslo, Bergen, Trondheim, Stavanger, Kristiansand, Bodø, Tønsberg and Alta). These multi-agency structures primarily focus on reducing the capacity of key actors to commit labour market offences. Other objectives include enabling foreign workers to uphold their rights and fulfil their obligations and preventing consumers and contractors from contributing to work-related crime through purchase of goods and services. According to the Norwegian authorities, the centres are appropriately staffed, with a balance between resources contributed by the participating agencies and resources retained within each agency’s own organisational lines.

54. The Norwegian Labour Inspection Authority provides information on work regulations and workers’ rights through its website, where some content is available in multiple languages to reach migrant workers. As part of the “Know Your Rights” campaign, this information has been translated and tailored specifically for migrant workers. The authority also runs social media campaigns targeting individuals in Norway who have set their smartphones to languages other than Norwegian. In addition, multilingual information materials are distributed during inspections, where inspectors frequently meet people with diverse language backgrounds. When needed, inspectors may also make use of interpreters.

³⁵ https://www.aftenposten.no/norge/i/aJ1m04/roedt-lederen-mener-aftenpostens-funn-er-grusomme-trengs-ekstraordinaere-tiltak?utm_source=chatgpt.com

³⁶ *Aftenposten*, *Avgjørende at vi tar grep*, 25 February 2025, <https://www.aftenposten.no/norge/i/yE0rWA/udi-har-gitt-12755-oppholdstillatelser-til-selskaper-som-har-brutt-loven>

55. Despite the above-mentioned measures, research findings show that there is insufficient information available to migrant workers about their rights, protection and the support services available. In the study on recruitment and exploitation of migrant workers in Norwegian food production referred to in paragraph 50, none of the surveyed workers had received any information about Norwegian labour laws, rights, protection and support services prior to leaving their home country or after arriving in Norway.³⁷ Another study highlights that it is somewhat coincidental who finds support services due to a lack of information that reach potentially vulnerable workers.³⁸ The lack of information can exacerbate vulnerability to exploitation and keep workers in exploitative situations longer as they do not know what their rights are or who to contact to seek help. In addition, prior to arriving in Norway, migrant workers often do not have information about the cost levels in Norway, and can therefore more easily be lured to pay higher costs in the recruitment phase and pay much higher prices for accommodation, transport and other products or services once in Norway.³⁹ In their comments on the draft GRETA report, the authorities affirmed that all third-country nationals who are granted a residence permit for work in Norway receive written information about their rights and obligations in the decision letter, which is in English. For Vietnamese seasonal workers, the police have produced a video in Vietnamese about their rights in Norway. GRETA notes, nevertheless, that this information may not reach the migrant workers directly when they are recruited by middlemen in their home country who then deal with their documents before departure to Norway.

56. Although there is a right to join trade unions for migrant workers, there are no memberships designed for temporary migrant workers and when trade unions are contacted about specific cases of exploitation, they offer limited legal aid to non-organised migrant workers. They also have limited leverage over non-organised employers.⁴⁰

57. A revised Action Plan on Social Dumping⁴¹ and Work-related Crime⁴² was launched in August 2025⁴³ (the previous one had been launched on 1 October 2022). It envisages the presentation of proposals to amend the Immigration Act with a view to preventing foreign workers from being exploited in connection with work and housing, measures to strengthen information for foreign workers, better access to legal aid and better rights for people performing work through digital platforms. The criminal offence of wage theft will be evaluated to examine whether it works as intended.

58. As noted in GRETA's third report on Norway, in 2022 the Norwegian Government introduced the Transparency Act, based on OECD's guidelines for multinational enterprises and the UN Guiding Principles of Business and Human Rights (UNGPs).⁴⁴ The Norwegian Consumer Authority has been given the task of providing guidance to enterprises and supervising their compliance with the Act. In 2024, the Government started work on evaluating the Act, involving reports from the consulting company KPMG and the research institute Consumption Research Norway (SIFO). An evaluation report was published in June 2025.⁴⁵ The report shows that Norwegian enterprises support the intentions of the Act. Many companies have experienced that as a result of the Act, the business sector has significantly increased prioritization of human rights obligations. However, some companies reported that the Act has led to bureaucratization and increased paperwork of due diligence and reporting. The evaluation also found that companies may choose to withdraw or refrain from investing in areas with a high degree of inherent risk of human rights

³⁷ Davis, T., *Rekruttering av migrantarbeidere, en studie fra norsk matproduksjon*, Kinginstituttet, 2023.

³⁸ Haapasaari, S et al., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*, HEUNI Report Series No. 109, 2024.

³⁹ Davis, T., *Rekruttering av migrantarbeidere, en studie fra norsk matproduksjon*. Kinginstituttet, 2023.

⁴⁰ Haapasaari, S et al., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*, HEUNI Report Series No. 109, 2024.

⁴¹ The term "social dumping" refers to the practice of giving workers, and particularly migrant workers, significantly poorer pay and employment conditions than Norwegian workers.

⁴² The term "work-related crime" refers to various forms of profit-motivated crime in working life. There is no legal definition of work-related crime; it is a generic term for acts that violate Norwegian laws on pay and employment conditions, benefits and taxes, often in an organised form, that exploit workers or distort competition and undermine the social structure.

⁴³ [Handlingsplan mot sosial dumping og arbeidslivskriminalitet - regjeringen.no](https://www.regjeringen.no/handlingsplan-mot-sosial-dumping-og-arbeidslivskriminalitet)

⁴⁴ See GRETA's 3rd report on Norway, paragraph 138.

⁴⁵ [Evalueringsrapport åpenhetsloven - regjeringen.no](https://www.regjeringen.no/evalueringsrapport-apenhetsloven)

violations, instead of implementing mitigating measures. Based on the findings of the reports, the Government will assess the need for eventual legislative amendments. According to civil society actors, while the Transparency Act has created a stronger culture of due diligence and corporate accountability, the Consumer Authority could focus more on dissemination of information to businesses on the risk of vulnerability to THB of migrant workers in national operations and supply chains. The need to update the National Action Plan on Business and Human Rights, which does not mention migrant workers as a risk group linked to adverse human rights impacts, was also stressed.

59. While welcoming the efforts of the Norwegian authorities and civil society to prevent the exploitation of migrant workers through legislative changes, information and training, as well as through the work of the Service Centres for Foreign Workers, GRETA notes with concern that there are gaps which increase the vulnerability of migrant workers to THB and exploitation. Referring to GRETA's Guidance Note on combating trafficking for labour exploitation⁴⁶ and the Council of Europe Committee of Ministers' Recommendation to Member States CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation,⁴⁷ GRETA considers that the Norwegian authorities should take further steps to prevent THB of migrant workers, in particular by:

- proactively providing information to migrant workers, in a language they can understand, about the Norwegian labour market, their rights and employment conditions, support services, grievance mechanisms and access to remedies, both prior to leaving their home countries and on arrival in Norway. This information needs to be disseminated in a way that is accessible for persons with limited digital access and digital skills;
- providing training on trafficking in human beings to labour inspectors and other relevant officials, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB for the purpose of labour exploitation;
- ensuring that migrant workers have access to reporting mechanisms and effective anonymous complaint mechanisms so that victims of abuse or exploitation can submit their case without fear of reprisals;
- strengthening existing laws and policies to ensure that they are aligned with the ILO Protocol of 2014 to the Forced Labour Convention and the ILO General Principles and Operational Guidelines for Recruitment, including banning recruitment fees **by law** in Norway;
- strengthening the Working Environmental Act in order to clearly define the legal framework for deduction of costs, ensure that wages are paid monthly to all migrant workers, and make the wage guarantee system accessible to all migrant workers;
- introducing more frequent controls and stronger sanctions for employers who operate with illegal agreements, conditions and contracts, and for the use of informal or unapproved actors (middlemen) in the labour provider space;
- providing clear information to businesses about their responsibilities when hiring migrant workers linked to using recruiters that double as facilitators/supervisors and clarifying employment responsibilities.

⁴⁶ <https://rm.coe.int/guidance-note-on-preventing-and-combating-trafficking-in-human-beings-/1680a1060c>

⁴⁷ <https://rm.coe.int/0900001680a83df4>

60. Further, GRETA considers that the Norwegian authorities should take further steps to ensure that the due diligence legislation is effectively applied to combat THB, in particular by:

- providing more information and knowledge exchange about the Transparency Act and the framework that underpins it to ministries, agencies, the judicial system, NGOs, trade unions and other bodies providing support to victims of labour exploitation;
- ensuring that businesses map, prevent and address the risks of THB in their operations and supply chains.

iii. Asylum seekers and refugees

61. Asylum seekers and refugees are particularly vulnerable to becoming victims of trafficking. According to UDI data, the number of asylum applications in Norway was 4 919 in 2022, 5 375 in 2023, 4 970 in 2024, and 3 637 in 2025.⁴⁸ In 2023, following the arrival of a high number of Ukrainians after the full-scale invasion by Russia, who also live in reception centres, Norway's capacity to process refugees reached breaking point and the UDI opened new reception centres across the country.⁴⁹

62. The UDI and the National Police Immigration Service (PU) are the main authorities responsible for asylum procedures in Norway. Applications for asylum are registered at the PU desks of the National Arrival Centres (NAS), where applicants' information is recorded and an initial assessment is conducted. Asylum seekers are registered in START (Self-registration tool) in a language they can understand and are informed that they can get help if they are victims of violence or exploitation. Applicants receive information about domestic violence and human trafficking in different languages through information screens and posters and brochures on NAS. Information about human trafficking is also available on UDI's webpage.⁵⁰ The PU revised its local action cards in the first half of 2025. As part of the revision process, local action cards and supplementary guidelines were developed to support operational staff in identifying potential victims of THB and responding appropriately. These tools were revised to align more closely with national guidelines and established best practice. In addition, the PU has developed a dedicated training on THB for its employees (see paragraph 73). If signs of vulnerability are detected, the PU would notify the relevant authorities, including the UDI, the legal section of the PU, the Human Trafficking Support Oslo (HTSO) and specialised NGOs (see paragraph 120). The Norwegian authorities indicated that all new arrivals at the NAS are offered a conversation with Caritas, in a language they can understand. When Caritas identifies vulnerable applicants, this is reported to the UDI, in agreement with the applicant. According to PU statistics, 28 cases with some level of suspicion of human trafficking were registered in 2024 and 15 in 2025. All cases were forwarded to the relevant police districts for investigation and victim identification.

63. After the registration of applications at the NAS, the asylum interviews are performed by UDI caseworkers. The UDI is responsible both for processing asylum claims and providing accommodation to asylum seekers, as well as temporary housing for persons awaiting deportation after their asylum applications have been denied. Asylum interviews are conducted with an interpreter to ensure clear communication during the interview process. Where the interviewer perceives indications of THB, the interviewer must map the suspicion (pursuant to [UDI 2010-081 \(udiregelverk.no\)](https://www.udiregelverk.no), chapter 5). The interviewer will then provide the applicant with information about the rights of potential victims of human trafficking and offer to put the applicant in contact with the support system, based on guidance material from KOM, ROSA and the website www.utnyttelse.no. Case officers can also seek help from the UDI's co-ordinators and contact persons for human trafficking. If an asylum seeker is identified as a presumed victim, their case can be prioritized. NGOs may also contact the UDI to request prioritisation when there are concerns about an applicant's vulnerability. While most asylum interviews are completed within a

⁴⁸ This data does not include Ukrainians who are granted temporary collective protection.

⁴⁹ [Norway To Open 50 New Asylum Centres - Life in Norway](https://www.udiregelverk.no)

⁵⁰ [Human trafficking - UDI](https://www.udiregelverk.no)

single day, particularly vulnerable individuals, especially in human trafficking cases, may require two to three days to allow for a thorough evaluation. In some cases, even though strong THB indicators are observed, asylum applicants deny being victims of THB, due to fear or feeling of shame, and prefer remaining at the reception centre instead of being moved to a specialised safe house.

64. According to UDI data, following Russia's full-scale invasion of Ukraine on 22 February 2022, a total of 102 428 Ukrainians have been granted temporary collective protection pursuant to section 34 of the Immigration Act.⁵¹ Because the majority of them are not interviewed individually by the PU or the UDI due to the collective protection process, they are asked in START whether they have been exposed to violence or exploited for human trafficking. Those who answer "yes" or "do not know" are summoned to an interview with the PU or the UDI. They are also informed that they can contact the police, UDI, reception centre staff or health personnel if they experience violence, abuse, exploitation or human trafficking. The UDI has published guidelines on temporary collective protection for persons displaced from Ukraine (UDI 2022-004) and an information campaign was launched at the border in co-operation with the immigration authorities. In addition, IOM held a course on THB in all emergency reception centres for Ukrainian refugees in 2022. However, GRETA was informed that many Ukrainian nationals did not enter the asylum reception system upon arrival, which has made it difficult to monitor their whereabouts or address potential issues related to their well-being and protection. As a result, support services and authorities face significant challenges in identifying vulnerabilities, including potential cases of exploitation or trafficking, among this group.

65. Most asylum seekers are accommodated in reception centres. When there is a suspicion that a resident in a reception centre may be a victim of trafficking, the centre has to carry out a conversation with the resident.⁵² The purpose is to provide information about who can offer help and clarify the resident's needs. Examples of follow-up can be assistance to contact the health services or the police, shielded housing facility or moving to another reception centre.

66. Norway operates a flexible network of asylum reception centres whose number and capacity vary over time in response to arrivals. These centres are run by private commercial actors based on a contract awarded on the basis of a public tender, under UDI's overall responsibility. There are ordinary reception centres for single adults and families, and separate centres for unaccompanied children (aged 15-18). The latter are staffed 24/7 to ensure continuous support and supervision. At centres for unaccompanied children, there are typically seven staff members working, all of whom are required to have relevant competencies, such as experience in child protection, working with children, and related fields. This ensures that the specific needs and vulnerabilities of unaccompanied children are properly addressed (see also paragraph 85).

67. Refugees who are granted residence are followed up through the municipal Introduction Programme after settlement.

68. Asylum seekers can apply for work after the first asylum interview. The initial work permit is issued by the UDI and is renewed if there is no doubt that the conditions are still met. However, GRETA was informed of cases of young male asylum seekers, including those from Syria, who were reportedly quickly drawn into the black market after applying for asylum. Trapped in desperate circumstances, they accept exploitative work as their only option, rarely reporting abuse for fear of losing any source of income or facing deportation.

⁵¹ As of 8 January 2026, see <https://www.udi.no/en/statistics-and-analysis/ukraina/>

⁵² See [Routines for reception centre \(udi.no\)](#) section 5.1.1 and ["tiltakskort" on THB \(udi.no\)](#) section 2, available in Norwegian.

69. GRETA visited the Vikhammer Reception Centre in Trondheim, which was opened in January 2024 and has a capacity of 150 places. On the day of the visit, it was accommodating 109 residents from 10 different nationalities (mostly Syrian), of whom 26 were children (including 5 unaccompanied children who had been assigned “companions”). GRETA was informed that there were 16 staff (including a nurse and a physiotherapist), ensuring presence from 8 am to 9 pm on weekdays and from 12 am to 9 pm on weekends. The unaccompanied children have legal guardians appointed by the County Governor. Each child has a primary and a secondary contact person amongst staff members. At least one assessment and intervention conversation takes place every month. While children of school age attend school and activities organised at the centre, there is no kindergarten for younger children. Asylum seekers are entitled to an allowance of NOK 4 000 (approximately 358 Euros) per month for a single adult, which get paid on a bank card. They are provided with access to Norwegian language classes (175 hours per year) and can work as volunteers (e.g. for the Red Cross).

70. Settlement and integration of refugees is a municipal task, and municipalities that settle refugees receive grants from the state. Settlement with public assistance is a voluntary offer from the state. There is only one offer of settlement, and refugees may be offered any municipality in Norway. This means that in order to have opportunities to participate in the introduction programme, receive introductory benefits and other financial assistance, persons in the target group for the introduction programme must be settled through an agreement between the municipality and the Directorate of Integration and Diversity (IMDi) of the Ministry of Labour and Social Inclusion. The IMDi employs some 70 diversity advisors across Norway, who are active at schools and learning centres for adult migrants and provide advice and guidance to persons subjected to negative social control and honour-based violence.

71. In Trondheim, the refugee’s health team works with asylum seekers, refugees settled in the municipality, people without papers and reunited families. The free-of-charge services offered by the team comprise health checks (including tuberculosis screening), vaccinations, psychological support and an induction programme which includes information on THB. The team provides a first point of contact for vulnerable people and is in a position to do an early mapping of vulnerabilities. In 2024, it received 1031 new patients. There were 712 patients from Ukraine, 142 from Syria, 45 from Eritrea and others from countries in Latin America, Asia and Africa. In this context, GRETA was informed that there are revised national guidelines for health-care staff on working with vulnerable people.

72. Reference has already been made in paragraph 36 to the Integration Act, which came into force in 2021, and the programme “Jobbsjansen” (“Job Opportunities”) designed to help immigrant women gain qualifications to secure long-term employment or education. There are plans to amend the Integration Act by introducing new measures in the induction programme aimed at improving refugee employment. These measures include stronger job-oriented activities, the inclusion of older refugees (ages 55–60) in the programme, and extended education opportunities.⁵³ Changes to the Integration Act were approved by Parliament in June 2025 and most of them entered into force on 1 January 2026. Further, the programme “Jobbsjansen” received NOK 23 million (2 million Euros) funding in 2026.

73. GRETA was informed that over the past year, the PU has prioritised trafficking in human beings, developing a comprehensive training programme in co-operation with the Regional Resource Centre on Violence, Traumatic Stress and Suicide Prevention (RVTS Øst). Online training on THB was made available by the PU in the second half of 2025 and will be mandatory for frontline staff and optional for other units within the PU. The RVTS Øst also provides training on exploitation and human trafficking. However, there is no obligation for private companies running the reception centres to follow training. In 2022, a webinar was delivered on the prevention and identification of exploitation among Ukrainian refugees. In addition, a handbook on social work with vulnerable migrants⁵⁴ was developed for health and social care workers, as well as others who come into contact with asylum seekers and migrants in their work.

⁵³ <https://schengenvisa.info.com/news/norway-introduces-new-measures-aimed-at-employing-more-refugees/>

⁵⁴ <https://rvtsost.no/nettbutikk/sosialt-arbeid-med-saarbare-migranter-kunnskap-regelverk-og-praktiske-raad>

74. During the visit, the GRETA delegation met representatives of the regional UDI offices in Bergen and Trondheim. Both of them engage in the national and regional anti-trafficking networks. These offices have staff assigned to oversee the reception centres, who hold weekly meetings to review reports and quickly address any issues. UDI Bergen has a designated contact person for trafficking in human beings, who regularly meets with other stakeholders to exchange information. The reception centres must have one staff member responsible for co-ordinating the follow-up of vulnerable groups and reporting potential trafficking situations. In Trondheim, GRETA was informed that all employees must complete an e-learning course on human trafficking.

75. The delegation also visited Trandum Immigration Detention Centre,⁵⁵ which is located close to Oslo International Airport. With an official capacity of 220, it was holding only around 20 persons (7 women, 13 men) by the time of the evaluation visit. The facility is divided into male and female wings. Detainees are housed in single rooms equipped with a bathrooms, television, radio and call system. The facilities include a gym, a small library, and video games. The staff is composed primarily of civilians from diverse professional and cultural backgrounds, including individuals from care institutions and the security sector. Staff are encouraged to engage with detainees to help identify vulnerabilities or potential victims. New staff undergo a basic two-month training programme, followed by bi-monthly sessions on various subjects. A PU prosecutor has provided training to the women's wing on THB, and e-learning courses are available on the PU intranet. The training mentioned in paragraphs 62 and 73 has also been made available to staff at the Trandum Centre. There are regular visits by lawyers and NGOs and weekly visits by the Red Cross, which conducts activities at the detention centre. Previously the in-house health care was available in the detention centre, however due to the reduced number of detainees, since January 2025, health care services have been managed by the public health sector under Ullensaker Municipality. Staff use telephone interpreters if they cannot find a common communication language with a detainee or use digital interpretation apps. Although staff and NGOs engage with detainees to identify vulnerabilities and refer cases to the authorities, there is no formalised screening system for THB indicators in place at the detention centre.

76. In addition, the PU runs a specialised return unit for families with children in Hurdal, which functions in close collaboration with the UDI and the national child protection services. The environment is designed to minimise stress, emphasizing that it is not a prison. Staff members are specialists working with children and possess significant experience in dealing with exploitation and vulnerability. They monitor for any signs of neglect or abuse, and any suspicions are promptly reported to child welfare services. GRETA was informed that in case of a suspicion of THB, the return process is interrupted.

77. GRETA welcomes the attention to the detection of vulnerabilities of THB amongst asylum seekers and refugees, and considers that the Norwegian authorities should:

- continue raising awareness of asylum seekers and refugees of the risks of human trafficking, including by ensuring that materials on trafficking in human beings are made available in multiple languages;
- implement capacity-building measures for the border police to enable them to detect THB indicators at the border, and ensure that a proper vulnerability assessment is carried out;
- facilitate greater access to the labour market, vocational training and Norwegian language courses for asylum seekers, to prevent them from becoming vulnerable to exploitation and THB.

⁵⁵ Originally a military camp until 1987, the facility became an asylum reception centre from 1998 to 2000 and was converted into a detention facility for foreign nationals without permits facing forced return on 1 January 2004.

iv. *Children and young people*

78. In Norway, children and young people are identified as a vulnerable group exposed to risks of trafficking for different forms of exploitation. The vulnerabilities of children to THB in Norway are linked to negative social control, dependency relationships, belonging to an ethnic minority group, mental health or substance abuse problems, or being an unaccompanied child. The disappearances of unaccompanied children from asylum reception facilities highlight their vulnerability.

79. As noted in paragraph 27, a growing concern is child criminal exploitation by criminal gangs, in particular in selling drugs. This risk primarily affects children and young people who live in vulnerable environments or areas, regardless of citizenship or migration status, and includes both Norwegian nationals and youth with immigrant. In 2021, the Regional Resource Centre on Violence, Traumatic Stress and Suicide Prevention (RVTS Øst) did a survey with 190 respondents from all relevant stakeholder organisations to gather knowledge about child criminal exploitation. On the question of how common it is for youth involved in crime to be exploited, 31% responded that it is very common and 40% responded that it is somewhat common. On what the exploitation specifically entailed, the most common responses were selling illegal drugs (121 responses); drug or money transport (112 responses); to keep drugs, money or stolen goods (106 responses); and sexual services (105 responses).⁵⁶ Following the survey and the related report, RVTS Øst published a handbook and developed an online course on child criminal exploitation. Training sessions have been conducted in different municipalities, with participation from youth and child welfare workers, as well as police officers. In one district, the local preventive unit created an action plan specifically aimed at combating the criminalisation of children. Key areas of focus include the intersection of violence, sexual exploitation, prostitution-related exploitation and housing-related vulnerabilities.

80. In Norway, local and central authorities share responsibility for the child welfare system. This includes the municipal Child Welfare Services, the Ministry of Children and Families, the Norwegian Directorate for Children, Youth and Family Affairs (Bufdir), the Office for Children, Youth and Family Affairs (Bufetat) and its five regional offices, the County Governors⁵⁷ and the Child Welfare Tribunals.

81. Public authorities have a statutory duty to report to the Child Welfare Service when there is a reason to believe that a child is or will be exploited for human trafficking (section 13-2 in the Child Welfare Act). This duty takes precedence over the statutory duty of confidentiality.

82. Bufdir has produced detailed guidance for the Child Welfare Service entitled "Minor victims of human trafficking - a guide for child welfare services."⁵⁸ Further, the Department for the Prevention of Domestic Violence under Bufdir has several specialised resources to address violence and support vulnerable individuals, including a competence centre focused on honour-based violence and the protection of vulnerable adults (TyggEST). The department also co-ordinates action plans, promotes cross-sector co-operation, and implements measures to increase knowledge of available services.

83. The National Guidance Unit for Cases of Trafficking in Children was established within Bufdir at the end of 2019, at the request of the Norwegian Parliament, following disappearances of unaccompanied asylum-seeking children from reception centres. The Guidance Unit is responsible for following up children who are victims of human trafficking and providing guidance to local Child Welfare Services and other actors in cases where human trafficking is suspected. The Guidance Unit works on improving procedures for the identification of children that are victims of trafficking, provides guidance, training and capacity-building activities, and strengthens co-ordination between different authorities. Initially, the Guidance Unit had three staff positions, but in 2025, they were reduced to 1.5 and in 2026, there will be only one

⁵⁶ Line Ruud Vollebæk, *Criminal exploitation of young people*, 2024, RVTS Øst and the Salt.To Secretariat in Oslo Municipality. Available at: https://utnyttelse.psb.webcore.no/wp-content/uploads/sites/9/2025/11/Ungdom-utnyttet-til-kriminalitet-ENG_digital.pdf.

⁵⁷ County governors check whether the local governments fulfil their child protection duties as a monitoring mechanism and supervises asylum centres for minors between the age of 15-18 as well as follow up local action plans.

⁵⁸ Available in Norwegian at: https://www.bufdir.no/fagstotte/produkter/mindrearige_ofre_for_menneskehandel/

position. GRETA was informed that this reduction in staff was the result of reprioritisation, justified by the low number of identified child victims of THB. To improve knowledge of child trafficking, in 2023, the Guidance Unit held a national seminar for childcare professionals and other frontline workers, focusing on the risks children face regarding technology-facilitated THB and other forms of exploitation, as well as 12 regional seminars in 2022-2023. Further, an information video was produced and made available on YouTube. However, according to the Guidance Unit, there is still little knowledge about child trafficking and training is not systematic. There is no mandatory training on THB for child protection services.

84. The revised Child Welfare Act (2023) contains a provision to protect potential victims of trafficking, namely an emergency order for the placement of a child in an institution when there is a risk of human trafficking and it is necessary to protect the child (section 4-5). If there is a need for further measures, the Child Welfare Service must promptly follow up the emergency order with an application to the Child Welfare Tribunal for long-term placement in an institution pursuant to section 6-6. If such an application has not been made within two weeks of the date of the order, the emergency order lapses. According to Bufetat, there is limited capacity for placement under section 6-6 and it is used as a last resort. The new provisions entered into force on 1 January 2023, replacing the previous section 4-29. GRETA was informed that prior to 2023, the number of decisions under section 4-29 were low (one per year in 2021 and 2022). In 2023, there were four decisions under section 4-5 and one decision under section 6-6, and in 2024, there were no decisions for placement under these sections, even though eight children were identified as possible victims of THB. According to Bufetat, all the children were either unaccompanied asylum-seeking children or migrant children who had arrived with their families. In 2025, there were six decisions under section 4-5 and two decisions under section 6-6. Four cases were received under section 6-6, one case was withdrawn and one case is under consideration.

85. The disappearance of unaccompanied children from asylum facilities continues to raise concerns. As explained in the third GRETA report, unaccompanied children aged 15-18 are accommodated in centres run by the UDI, and younger children are under the responsibility of Bufetat. During the initial intake process, staff at reception centres are required to have conversations with children going through the asylum process, particularly those working with unaccompanied children. These informal interviews provide an opportunity to learn about the child's background, experiences and needs. The aim is to build trust, gain a better understanding of each child's situation and ensure they receive the appropriate level of care, protection and support. According to information from the authorities, between 1 January 2023 and 31 July 2025, a total of 51 cases of disappearances (19 in 2023, 26 in 2024, and 6 in the first seven months of 2025) were reported, involving 43 children, some of whom were reported missing several times. As regards children younger than 15, the number of those who disappeared in 2022-2025 was 5.⁵⁹ As noted in the third GRETA report, Bufetat has developed guidance on how to act when a child goes missing.⁶⁰ During the visit to the Vikhammer Reception Centre in Trondheim, GRETA was informed that staff followed the guidance and reported cases of missing children to the UDI, the police and the child welfare service. The guidance developed by the UDI on routines for the reception centres on how to act when an unaccompanied child goes missing is available online together with schemes that the UDI has developed with the police for reporting a missing child.⁶¹ In Bergen, GRETA was informed that the reception centre to children (which was not visited by the delegation), accommodated boys and girls aged 15 to 18 originating primarily from Syria, Afghanistan, Gambia, Eritrea and Ukraine, and was staffed by seven professionals with childcare and health backgrounds, trained on trauma-informed care and vulnerability assessments.

⁵⁹ GRETA was informed that there were some 170 children younger than 15 in childcare centres at the time of the visit.

⁶⁰ See GRETA's 3rd report on Norway, paragraph 186.

⁶¹ [UDI 2015-009V2](#); [UDI 2015-009V1](#); [UDI 2015-009V3](#).

86. According to staff working at asylum reception centres, transitioning into adulthood is “very brutal”: on the day the child turns 18, he/she is transferred to a different centre, which can be very hard for them.

87. Municipal child welfare services are legally responsible for all children present in the municipality, including asylum-seeking and unaccompanied children, irrespective of registration or settlement status. However, the lack of funding and focus on unaccompanied children was highlighted as an issue, as well as the need for training for child welfare services, institutions and foster homes.

88. Following several instances of peer-to-peer sexual assault in childcare institutions, Bufdir was in the process of preparing a toolbox for children in institutional care, including a tailored information package, and the adoption of additional measures to facilitate children’s access to confidential reporting mechanisms. In their comments on the draft GRETA report, the authorities indicated that this work was ongoing, and that Bufdir had conducted input meetings with children and young people as well as staff in institutions.

89. The Norwegian authorities have noted that negative social control and honour-related violence has intersections with human trafficking, and therefore efforts to prevent them are relevant for combating THB. In recent years, the IMDi has commissioned extensive research on negative social control and honour-related violence, which found that girls from Muslim, Asian and African backgrounds are most vulnerable and that queer youth with immigrant backgrounds face high risk of threats, violence or family or community ostracism.⁶² National reports and expert groups have contributed to greater knowledge on the prevalence of negative social control in schools, its occurrence on digital platforms, the causes and consequences for children and young people who are left abroad, and the experiences of queer immigrants facing negative social control and honour-related violence.

90. The National Team for building competence on negative social control and honour related violence is an inter-agency team that assists in specific cases of forced marriage, female genital mutilation or other forms of honour-related violence.⁶³ Diversity advisors are deployed at schools and adult education centres around the country, and work to prevent persons, primarily young people, from being exposed to negative social control, involuntary stays abroad, female genital mutilation and forced marriage. The IMDi has a team for the prevention of negative social control which is mainly focused on employees in schools that do not have diversity advisors and employees in adult education centres and refugee services. Further, IMDi develops, publishes and manages content on the web portal Nora,⁶⁴ which is one of several tools in the work against negative social control.

91. As noted in paragraph 18, in 2024 a legislative committee appointed by the government published a green paper (NOU 2024:13) assessing whether the legislation provides adequate legal protection for children and young people who are subjected to negative social control, honour-related violence, forced marriages and child marriages. This has led to recent amendments to the Child Welfare Act (see paragraph 18).

92. The Ministry of Labour and Social Inclusion has launched a new Action Plan against Negative Social Control and Honour-related Violence⁶⁵ for 2025-2028 (following the expiry of the previous plan for 2021-2024). The plan includes measures in four areas of action: legal protection, prevention, improving competence in the civil service and involuntary stays abroad. Measure 23 of the Action Plan aims to enhance interagency co-operation and improve the transfer of expertise between services working on human trafficking and those specialised in addressing negative social control and honour-based violence.

⁶² <https://www.imdi.no/globalassets/rapporter/2025/arsrapport-sarskilte-tjenester-2024-digitalt.pdf>

⁶³ <https://www.regjeringen.no/contentassets/42483a2aaa5444459c1de91f1b7c1fdd/no/pdfs/sjef-i-egget-liv.pdf>

⁶⁴ Nora

⁶⁵ Action Plan Against Negative Social Control and Honour-related violence, <https://www.regjeringen.no/en/documents/sjef-i-egget-liv-styrket-innsats-mot-negativ-sosial-kontroll-og-aresmotivert-vold-2025-2028/id3100799/>

93. The Government has also adopted an Escalation Plan to Combat Violence and Abuse Against Children and Domestic Violence (2024-2028), which involves broad cross-sectoral efforts against violence and abuse, including the provision of information on rights and available assistance to individuals arriving through family reunification, a group highly vulnerable to exploitation as they are heavily dependent on the person who brought them to Norway. Further, there is a national helpline for children and young people who have been subjected to violence, abuse or neglect (116111.no).

94. Of relevance to the prevention of child trafficking is also the Government white paper on creating a safer digital childhood (see paragraph 178).

95. As part of efforts to prevent child trafficking, the IMDi and the Police organise awareness-raising activities at schools. In Bergen, GRETA was informed that police officers deliver preventive sessions in schools, usually to schoolchildren aged around 14, focusing on digital applications and drugs.

96. The NGO Lightup is a youth-led organisation working on prevention of THB through awareness-raising and by educating young people about consent, boundaries, online risks and links to exploitation. Through workshops, school visits and university lectures, it empowers youth to recognize signs of trafficking, make informed decisions and contribute their voices to public debate. Light-up creates youth-friendly information materials such as the educational card game *Human.kind*, digital platforms like *myRights.no* and *Pornopratt.no* as well as podcasts. It has presence on social media platforms (Instagram) to raise awareness among youth in ways that feel relevant, accessible and inclusive.

97. While commending the measures implemented to prevent child trafficking and the work of the National Guidance Unit for Cases of Trafficking in Children, GRETA considers that the Norwegian authorities should take additional steps to:

- raise children's awareness of their rights and the risks of human trafficking, including recruitment and abuse through internet/social networks, and how to report abuse, paying particular attention to children in vulnerable situations;
- mainstream the prevention of THB through the national educational system in order to raise children's awareness of the risks of human trafficking by integrating age-appropriate content into school curricula, promoting digital and media literacy, training teachers, involving NGOs and peer educators, and empowering school counsellors to identify and respond to trafficking risks;
- ensure that the National Guidance Unit for Cases of Trafficking in Children is provided with sufficient funding to keep the focus on the prevention of child trafficking;
- establish mandatory and regular training on THB (including trafficking indicators and procedures) for child welfare workers, health-care providers and other frontline professionals to improve early detection of vulnerabilities and appropriate responses;
- strengthen monitoring and follow-up mechanisms for unaccompanied children, including those who go missing from reception facilities, and clarify the responsibilities of local child welfare services in such case;
- develop protocols and tools for identifying and referring children at risk of trafficking and grey-zone exploitation (e.g. honour-based violence, familial control), ensuring consistent use of the protective measures under the Child Welfare Act;
- take steps to improve the process of safe transitioning into adulthood of unaccompanied children in order to decrease vulnerabilities and mitigate any risk of been trafficked.

v. *Persons with disabilities*

98. Persons with disabilities⁶⁶ are not expressly mentioned in the Council of Europe Anti-Trafficking Convention, but their vulnerability to human trafficking is documented in reports issued by GRETA and other international bodies. Amongst the factors which render persons with disabilities vulnerable to THB are dependence on caregivers or support systems, limited access to information and resources, difficulty communicating or advocating for themselves, stigma and discrimination, as well as lack of or limited access to the labour market and decent work.⁶⁷ Reference can also be made to the Committee on the Elimination of Discrimination against Women' (CEDAW) General recommendation No. 38 (2020), which states that women and girls with disabilities are a group particularly vulnerable to being trafficked, and calls on States to provide them with special economic and social support.⁶⁸

99. Norway ratified the UN Convention on the Rights of Persons with Disabilities (the Convention) in 2013. In its concluding observations on the initial report of Norway, dated 4 April 2019, the Committee on the Rights of Persons with Disabilities welcomed the adoption of various legislative, policy and administrative measures, such as the Equality and Anti-Discrimination Act in January 2018, the action plan for lesbian, gay, bisexual, transgender and intersex persons on safety, diversity and openness (2017–2020), which features a programme aimed at incorporating issues relating to disability, sexuality and LGBTI persons into the online information service run by the Directorate for Children, Youth and Family Affairs; and the 2018 National Inclusion Initiative, which includes persons with disabilities as a target group. However, the Committee was concerned about, inter alia, the absence of a comprehensive strategy or action plan for the implementation of the Convention, the differences between the services offered by the different municipalities to persons with disabilities, and the lack of sustainable financial support for organisations of persons with disabilities.

100. In their reply to GRETA's questionnaire, the Norwegian authorities indicated that normalisation and inclusion have been key words for a number of reforms aimed at people with disabilities. The aim of the responsibility reform was to safeguard the right to an independent life and to be part of society, with the same choices as others - also the right to choose how you want to live. The Housing Bank has provided guidelines for co-located housing and community housing to prevent institutional-like housing, which recommend that the number of residential units that are located together must not be too large, and they should be placed in ordinary living environments.

101. Children with mental disabilities or reduced cognitive capacity in the child welfare system are monitored and supported based on their specific needs to ensure appropriate care, protection and access to services. Children must have a legal guardian who operates independently from the municipal system. Shelters have dedicated staff focused on supporting children, ensuring their safety and well-being. Public servants are legally obligated to report any form of child abuse.

102. GRETA was informed that the RVTS Øst held a webinar in November 2024 and in June 2025 organised a national digital conference, which included the topics of intellectual disabilities and exploitation.

103. Further, GRETA was informed that the HTSO encountered a case involving a victim with a disability who was subjected to forced begging and theft. The Municipality of Oslo arranges suitable accommodation for such individuals.

⁶⁶ According to Article 1 of the UN Convention on the Rights of Persons with Disabilities, persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

⁶⁷ See OSCE, *Invisible Victims: The Nexus between Disabilities and Trafficking in Human Beings*, March 2022, p. 16.

⁶⁸ CEDAW, [General recommendation No. 38 \(2020\) on trafficking in women and girls in the context of global migration](#), paragraphs 40 and 55.

104. GRETA considers that the Norwegian authorities should conduct research into the vulnerabilities of persons with disabilities to trafficking in human beings and develop preventive measures specifically aimed at this group.

vi. LGBTI people

105. GRETA emphasises that, in general, LGBTI people are at an increased risk of becoming victims of trafficking, particularly because they are often marginalised in society and excluded from their families, making them ideal targets for traffickers looking for people with less protection. They also face difficulties in accessing the labour market, as employment opportunities are scarce for those who identify outside the traditional gender binary, leading them to work more in the informal economy (including prostitution) or even to accept abusive job offers. In addition, there is a significant proportion of LGBTI people among homeless people, and LGBTI people can be victims of discrimination by the authorities and services, making them less likely to file a complaint or ask for help.⁶⁹

106. As noted in paragraph 31, the number of trans women providing sexual services in Norway has increased. The research carried out by Pro Sentret referred to in paragraph 32 found that they were exposed to additional vulnerability factors in their countries of origin, such as extreme discrimination, violence, treats and lack of job opportunities.⁷⁰ Further, according to the research by Proba (an independent research institute focusing on social welfare issues), queer people with an immigration background are one of the groups that are particularly vulnerable to negative social control.⁷¹

107. GRETA welcomes the attention paid by research to the vulnerabilities of LGBTI persons and considers that the Norwegian authorities should continue taking steps to address their vulnerabilities to trafficking in human beings, in close co-operation with civil society organisations.

2. Measures to protect and promote the rights of victims of trafficking

108. Chapter III of the Convention provides for a series of measures to protect and promote the rights of victims. In the first place, it is of paramount importance to identify victims of trafficking correctly as identification enables them to benefit from the other measures and rights contained in the Convention. Pursuant to Article 10 of the Convention, States Parties shall ensure that the authorities competent to identify victims of trafficking have persons trained and qualified to perform the identification, and that these authorities collaborate with relevant support organisations in the identification process. Further, Article 12 of the Convention sets out the assistance measures which States Parties must provide to trafficking victims. Paragraph 7 of this article requires Parties to ensure that services are provided taking due account of the special needs of persons in a vulnerable position as well as the rights of children. Given the relevance of victim identification and assistance to the thematic focus of the fourth evaluation round of the Convention, this part of the report examines the application of these two provisions. Other provisions of Chapter III of the Convention, which have been examined in detail by GRETA during the previous evaluation rounds, are discussed in the chapter of the report entitled "Follow-up issues".

⁶⁹ See: <https://lac.iom.int/en/blogs/lgbtqi-victims-human-trafficking> and <https://2017-2021.state.gov/wp-content/uploads/2019/02/272968.pdf>.

⁷⁰ Ida Kock, Jose Colmenares Ranes and Victoria Mumuni, *In Transit: Migrants Who Sell Sex in Norway*, Pro Sentret, 2023.

⁷¹ <https://proba.no/rapporter/omfang-av-negativ-sosial-kontroll/>

a. Identification of victims of THB

109. In its second and third evaluation reports, GRETA urged the Norwegian authorities to strengthen the identification of victims of trafficking and their referral to assistance by setting up a formalised National Referral Mechanism (NRM) which defines the procedures and roles of all frontline actors who may come into contact with victims of trafficking. GRETA also recommended ensuring that there is a separation between immigration enforcement functions and labour inspectorate roles, and that labour inspectors prioritise the detection of persons working in irregular situations who are vulnerable to THB. Another recommendation concerned improving the identification of victims of trafficking among asylum seekers, migrants and persons placed in detention centres.

110. As mentioned in paragraph 13, there is still no NRM in Norway. The decentralised system for victim identification described in the previous GRETA reports continues to operate, without a single agency with primary responsibility for the identification of victims of THB. Different authorities are responsible for assessing eligibility for rights and providing necessary follow-up support, including the police, child welfare services, immigration authorities, health authorities, the Norwegian Labour and Welfare Administration (NAV), the Labour Inspection Authority, legal aid lawyers, child legal guardians/representatives, and NGOs carrying out assistance tasks on behalf of public authorities. Formal identification as a victim of THB is not required in order to access assistance.

111. As noted in paragraph 22, the new National Strategy envisages the establishment of an NRM which will be co-ordinated by the Secretariat of the National Mediation Service (NMS). Civil society representatives expressed reservations entrusting the co-ordination of the NRM to the NMS, which has no prior engagement in the area of combating human trafficking. The Ministry of Justice argued that the NMS, which provides a public service that facilitates restorative processes in both criminal and civil cases, and has 12 regional offices spread across 22 locations, would be well-placed to co-ordinate different agencies working on combating THB. As noted in paragraph 20, the NMS is expected to recruit three new staff members to deal with the tasks related to THB and to integrate the tasks of KOM. GRETA was informed that the NRM will follow a low-threshold model, focusing on flexible co-operation, safeguarding victims' rights, and improving data collection and statistics. The NRM will be gradually rolled out, but no fixed timeframe has been set for its implementation. Following the evaluation visit, GRETA was informed that working meetings have been initiated to form the NRM. In their comments on the draft GRETA report, the authorities stated that the NMS formally started working on human trafficking issues on 1 January 2026. As noted in paragraph 20, new staff have been hired, but no timeframe has yet been set for dealing with the many tasks that they have been assigned.

112. In 2023, KOM developed a national guide for identification of possible victims of human trafficking.⁷² The guide provides national procedures for victim identification (including indicators and victims' rights) and referral to protection and support. The guide has been translated into English. In addition, in 2024 KOM produced a new information leaflet for potential victims,⁷³ also translated into English. To improve accessibility to these materials, QR code cards⁷⁴ have been developed by KOM, allowing possible victims to easily access the information.

⁷² The guide contains a list of relevant authorities and organisations in Norway and internationally that play a role in tackling human trafficking. <https://www.politiet.no/globalassets/rad-og-veiledning/menneskehandel/guide-for-identification-of-possible-victims-of-human-trafficking.pdf>

⁷³ <https://www.politiet.no/globalassets/rad-og-veiledning/menneskehandel/information-brochure-for-possible-victims-of-human-trafficking.pdf>

⁷⁴ <https://www.politiet.no/globalassets/rad-og-veiledning/menneskehandel/qr-kort-med-lenker---qr-code-cards.pdf>

113. Since 2017, Regional Resource Centre for Violence, Traumatic Stress and Suicide Prevention (RVTS) – which exist in five regions of Norway - have been responsible for training and supporting health workers, social workers, and other frontline professionals in identifying and assisting victims of human trafficking. Examples of the work carried out by RVTS Øst were already provided in preceding parts of the report. In June 2025, the website menneskertilsalgs.no was replaced with www.utnyttelse.no,⁷⁵ and the content was revised and updated.

114. The Human Trafficking Support Oslo (HTSO), which employs three staff, serves as the first door to the identification of presumed victims of THB in Oslo. It collaborates with several NGOs, such as the Salvation Army and ROSA, to identify and support victims. The HTSO also runs a national helpline, which received 71 calls in 2024.

115. The NGO ROSA continues to operate a national helpline, supported by state funding. The helpline received 1 087 calls in 2023 and 1 233 calls in 2024. ROSA co-ordinates the referral of victims to shelters and other forms of assistance. However, the funding provided by the state to ROSA has not been increased,⁷⁶ despite the fact that it serves as a referral point for cases identified by the Police, the Labour Inspection, the UDI and other agencies.

116. According to civil society organisations, there are problems with the identification of victims of THB amongst persons engaged in prostitution, despite outreach work carried out, due to the lack of resources and the prioritisation of other crimes by the police. NGOs are apparently not notified when the police organise raids and possible victims of THB are quickly deported before NGOs have been able to meet them. There is a loss of trust amongst persons engaged in prostitution in the chances to receive support from the authorities, resulting in low victim identification rate.

117. In its third evaluation report, GRETA considered that Norwegian authorities should screen irregular migrants about to be returned for indicators of THB, especially among groups who may be considered at risk, such as persons engaged in prostitution and unaccompanied children. The PU has the national responsibility for the return of irregular migrants (see also paragraphs 75-76). Border control is carried out by the local police. Even though GRETA was informed about a training initiative in Bergen, where staff at Flesland Airport receive training to identify potential trafficking indicators, there is no mandatory training on THB for border police officers. As a result, they are not sufficiently sensitised to THB to enable them to detect presumed victims. NGOs have raised concerns that border police stop and deport women without properly assessing their vulnerabilities or potential victim status. GRETA was informed of cases where Nigerian women were sent back immediately at the border.

118. Further, as noted in paragraph 39, despite the fact that civil society organisations submit tips to the authorities about many possible cases of THB for the purpose of labour exploitation (e.g. related to ID-theft, wage theft, retention of documents, bad living conditions), most cases are not investigated and many victims of THB are overlooked.

119. GRETA was informed that since the COVID pandemic, Norway had not participated in EMPACT Joint Action Days. Previously, when the Norwegian Police and Labour Inspection Authority participated in EMPACT activities, this resulted in a number of suspected cases of THB being identified. In their comments on the draft GRETA report, the Norwegian authorities indicated that Norway's participation in EMPACT Operational Action (OA) areas is prioritised according to the national needs and THB trends. Regrettably, the OA on labour exploitation has not been prioritised during the last EMPACT period. However, the National Criminal Investigation Service (KRIPOS) has a dedicated co-ordinator who participates in various OA's related to THB.

⁷⁵ [utnyttelse.no – ved utnyttelse og menneskehandel](http://utnyttelse.no)

⁷⁶ The funding provided for the running of the helpline amounted to NOR 5 million (approximately 440 000 Euros) in 2023, NOK 5.3 million in 2025, and NOK 5.6 million (approximately 493 000 Euros) in 2025 and 2026.

120. The UDI has developed action cards,⁷⁷ guidelines “UDI 2014-031 Victims of human trafficking in applications for protection”⁷⁸ and guidelines “UDI 2015-029 Identification and follow-up of vulnerable residents in asylum reception centres”⁷⁹ to facilitate the detection of indicators of trafficking amongst applicants for international protection and the referral of presumed victims to further assistance. The UDI Asylum Department has a training system for all new caseworkers. This includes two weeks of basic training covering interview techniques and the legal framework, as well as a full-day session focused on vulnerabilities, including the assessment of LGBTQI and trafficking cases. All new caseworkers complete this training, while specialised caseworkers also receive one-on-one training tailored to specific cases. Specific e-learning on THB is also available for reception centre staff (see also paragraph 73).

121. The UDI provides presumed victims of human trafficking with assisted return and reintegration support through a programme for the voluntary assisted return of vulnerable migrants operated by the IOM. The UDI's return unit collaborates with IOM on an individual, case-by-case basis according to each person's specific vulnerabilities. When indicators of human trafficking are identified, which is classified as a key vulnerability, the agencies work together to develop tailored solutions to address these complex issues and determine the appropriate course of action. In 2024, two individuals received reintegration support and returned to their home or a third country, one with IOM assistance and one accompanied by the PU, compared to three returns in 2023.⁸⁰

122. In its third report, GRETA urged Norwegian authorities to review the legislation limiting the time period for appealing negative asylum decisions with a view to allowing sufficient time for identifying victims of trafficking and ensuring the effective exercise of the right to judicial review.⁸¹ The individuals whose cases were rejected can apply to the Immigration Appeals Board (UNE) which reviews appeals against rejection decisions made by the UDI. GRETA was informed that all rejected applicants who are possible victims of THB appealed. Rejected asylum seekers are entitled to free legal aid when appealing and may submit supplementary information after the deadline. There is no change observed in the time period for appealing negative asylum decisions. In 2024, UNE processed four appeals concerning limited residence permits under Section 8-3(2) of the Immigration Regulations and one under Section 8-4. In the cases under section 8-3(2), UNE upheld the UDI's rejections, noting that the police had not investigated the matters as human trafficking and did not consider the applicants' presence in Norway necessary for an investigation or prosecution. In addition, UNE reviewed three other cases with information or indications of trafficking but found no reasonable grounds to conclude that the appellants were victims of human trafficking.

123. The NGO ROSA has implemented a project aimed at improving the identification of victims of trafficking in prisons. ROSA was allocated NOK 140 000 (approximately 11 900 Euros) to provide training to prison staff on indicators of THB and responding appropriately to vulnerable individuals in custody. In 2023, ROSA identified two victims of THB in prison and continued to support two previously identified victims. The Salvation Army also works in prisons and has observed an increase in young people detained for drug-related offences which might be related to THB.

⁷⁷ The action cards includes information on THB indicators, the rights of victims of THB and the procedure for identifying victims. Available in Norwegian at: <https://www.udi.no/globalassets/asylmottak2/tiltakskort-menneskehandel--1.pdf>

⁷⁸ Available in Norwegian at: <https://www.udiregelverk.no/rettskilder/udi-retningslinjer/udi-2014-031/>

⁷⁹ Available in Norwegian at: <https://www.udiregelverk.no/rettskilder/udi-retningslinjer/udi-2015-029/>

⁸⁰ See KOM annual status report 2024, p. 47.

⁸¹ See GRETA's 3rd report on Norway, paragraph 169.

124. While acknowledging the steps taken since the third report, GRETA once again urges the Norwegian authorities to improve the identification of victims of THB, in particular by:

- setting up a formalised NRM which defines the roles and responsibilities of all frontline actors who may come into contact with victims of THB, in order to improve clarity and legal certainty, and applying the procedures to all victims, regardless of the setting in which they are identified;
- co-operating with specialised NGOs to improve the proactive detection of victims;
- improving the identification of victims of trafficking among asylum seekers, migrants and persons placed in detention centres through the provision of systematic training and guidance to border police officers, asylum case workers, staff in asylum reception centres and prison staff;
- screening irregular migrants about to be returned for indicators of THB, especially among groups who may be considered at risk, such as persons engaged in prostitution;
- reviewing the legislation limiting the time period for appealing negative asylum decisions with a view to allowing sufficient time for identifying victims of trafficking and ensuring the effective exercise of the right to judicial review.

b. Assistance to victims

125. In its third report on Norway, GRETA stressed that the rights of victims of trafficking to assistance should not only rest on the outcome of the police investigation and legal proceedings in criminal cases (provided that the offence is qualified as THB in the first place), but rather on a coherent independent decision, which is linked to the introduction of an NRM. GRETA considers that the authorities should provide longer-term, sustainable funding for NGOs that provide assistance to victims, guarantee a sufficient number of accommodation places for victims of trafficking, including outside Oslo, as well as access to public health care for victims of trafficking.

126. There are no changes in the funding for NGOs that assist victims. The grant scheme operated by the Ministry of Justice and Public Security disbursed NOK 37 753 000 (approximately 3.3 million Euros) in 2024 and NOK 39 261 000 (approximately 3.5 million Euros) in 2025. NGOs expressed concerns about the lengthy application process for funding. The Church City Mission in Oslo reported losing 30% of its social workers due to insufficient funding. NGOs highlighted the need for targeted and long-term funding, which they consider more effective and sustainable. One reason cited for limited funding is reduced public and media attention, as trafficking is perceived as a marginalised issue. The authorities have argued that even though funding is only given for one year at the time, in practice, there has been no sudden changes in the way funds are awarded. During the visit, GRETA was informed that following the adoption of the new National Strategy against THB, the authorities would review the funding arrangements with the goal of securing multi-year support to ensure the stability and continuity of services.

127. If a possible victim of THB is identified during the asylum process, he/she is provided with information about ROSA and given its contact details. Due to confidentiality, the UDI does not notify ROSA directly unless the applicant wishes for the case worker to do so. ROSA conducts an individual assessment and, depending on the case, may arrange accommodation in a safe house or at a secret location, though some presumed victims may choose alternative arrangements. In 2023, ROSA supported nine asylum seekers to access offers for safe housing and other support services. The funding provided to ROSA by the state has not been increased in the last 20 years, even though the NGO serves as the main point of contact for the assistance and follow-up of presumed victims of THB.

128. Several NGOs provide safe accommodation for presumed victims of trafficking in Oslo, including the Church City Mission (*Kirkens Bymisjon*), the Salvation Army (*Frelsesarmeen*) and the Marita Foundation (*Maritastiftelsen*). During the evaluation visit, GRETA visited once again the shelters Laura's house and Filemon in Oslo.

129. Laura's House, run by the Church City Mission, provides nine one-bedroom apartments with a kitchen and a bathroom specifically designed for women and their children. During GRETA's visit eight women and two children were residing in the shelter. Laura's House is fully funded by the Ministry of Justice and Public Security. It co-operates with Norway's child protection system to ensure the safety and well-being of children. In recent years, Laura's House has noted a growing number of women with older children seeking shelter. This trend has raised concerns, as the limited availability of spaces for women accompanied by children means that these women might fall outside the scope of assistance offered at the shelters. Many residents at Laura's House have experienced significant trauma, and the shelter focuses on stabilising their situations and fostering a sense of predictability in daily life. The facility specialises in mental health support and assists residents in navigating the Norwegian healthcare system. Nonetheless, a gap remains in providing specialised care for individuals with severe mental health conditions who are unable to live in close proximity to others within a residential setting.

130. The safe house Filemon, operated by the Salvation Army, provides accommodation to male victims. Established in 2016 and fully funded by the Ministry of Justice and Public Security, it provides accommodation, motivational interviews, life skills training, access to public services and work placement through partnerships with companies. The number of residents was 12 in 2024, 9 in 2023, 10 in 2022, and 15 in 2021.

131. There are currently no dedicated safe housing options available for transgender persons. In addition to the specialised shelters for victims of THB, there are 43 crisis shelters across the country and 21 centres for survivors of incest and sexual abuse, which are funded by municipalities. In 2023, the shelters housed approximately 2 200 adults and 1 100 children. While the crisis centres primarily support victims of violence, they can also assist victims of THB. The crisis centres offer a range of support and recovery services, including emotional support, guidance, training and help with gaining control over personal finances. Some trafficking victims arrive at the crisis centres independently, while others are referred by the police.

132. Regarding access to health care, in 2024 the HTSO renewed an agreement with a local general practitioner to offer early health checks, including tuberculosis screening, to all potential trafficking victims. This ensures timely healthcare even when delays occur in granting reflection periods or assigning personal ID numbers, which are normally required to access regular GPs. The HTSO covers the costs of these services. The HTSO can also provide funding for dental care, Norwegian language classes, other suitable training programmes and additional assistance required. In 2024, the number of presumed victims assisted by the HTSO was 28 (including 20 women, seven men and one transgender person).⁸² Of the 28 presumed victims, 16 were newly identified in 2024, while 12 were carried over previous years.

⁸² The type of the exploitation recorded was 12 cases of forced labour, 10 cases of prostitution or other forms of sexual exploitation, two criminal exploitation cases, and the remainder were combinations of several forms of exploitation. There were 8 victims from Colombia, 7 from other South American countries, 6 from Asian countries, 4 from African countries, 2 from European countries, and 1 from the Middle East.

133. As noted in GRETA's third report, the Ministry of Health set up in 2018 a national network of health-care professionals working with victims of THB.⁸³ In 2023, the national guidelines on health services for asylum seekers, refugees and reunited family members were updated to include a revised chapter on human trafficking. A final report,⁸⁴ published in 2024, emphasised the need for a better co-ordinated system for identifying victims, greater awareness among healthcare professionals of confidentiality and their duties to disclose and avert abuse, and stressed that human trafficking should be addressed within the broader context of abuse and violence. The Directorate of Health largely supported these recommendations in its evaluation submitted to the Ministry of Health and Care Services, noting that some may require legal or other considerations, and stressed that strengthening systems to support trafficking victims would also benefit other vulnerable groups, such as victims of violence.

134. Access to psychological care continues to be difficult for the victims of THB. Psychological support is available at the crisis centres, but it is not provided by trained psychologists or trauma specialists. Victims requiring more specialized care can be referred by their general practitioner, except in acute situations needing immediate attention. The referral pathway is bureaucratic and long-standing leaving the victim in a vulnerable situation. ROSA has received funding amounting to NOK 200 000 (approximately 17 880 Euros) for psychosocial support, which is sufficient to cover 50 sessions.

135. Support Centres for Crime Victims were established in 2017 with the purpose of strengthening victim care through a low-threshold, easily accessible service. They operate in every police district and work in close collaboration with other stakeholders, particularly social workers. To ensure accessibility, brochures are available in multiple languages at all police stations and include a national telephone number. The centres provide comprehensive psychosocial support, help victims regain a sense of safety and offer essential information, including guidance on the state compensation scheme and assistance with applications. They can also support victims in securing legal representation. Translators, often used over the phone for safety reasons, are available when needed.

136. Reiterating the recommendations made in its third report, GRETA considers that Norwegian authorities should further develop and strengthen the assistance measures offered to victims of THB, and in particular:

- provide longer-term, sustainable and sufficient funding for NGOs that provide assistance to victims in order to ensure the continuity of victims' assistance, for as long as required by the victim's individual situation;
- taking into account the increasing number of cases of THB for labour exploitation and male victims, guarantee a sufficient number of accommodation places for victims of trafficking, including outside Oslo;
- provide safe accommodation places for all victims who need them, including trans gender persons;
- improve timely access to health care and psychological support for victims of THB.

⁸³ See GRETA's 3rd report on Norway, paragraph 178.

⁸⁴ The report is available in Norwegian at: <https://www.helsedirektoratet.no/rapporter/nasjonalt-nettverk-for-arbeid-mot-menneskehandel-i-helse-omsorgstjenestene-2021-2023>

c. Identification of, and assistance to, child victims of trafficking

137. There have been no changes to the procedure for the identification and provision of assistance of child victims of THB. The Norwegian Child Welfare System, regulated by the Child Welfare Act, is responsible for identifying and protecting child victims of trafficking, regardless of their nationality or status. Child protection services often rely on risk assessments conducted by the police and most cases are typically referred to them through police channels. The involvement of child protection usually begins after the police identify potential risks to a child's safety or well-being, highlighting the strong dependency on law enforcement for initiating protective interventions. Child protection services also operate outreach programmes which aim to identify at-risk children.

138. The number of presumed child victims of THB identified in Norway has been very low. Efforts have also been made to improve reporting mechanisms, including enhancing the role of the national child helpline (see paragraph 93) in responding to reports of abuse. However, interlocutors informed GRETA that the helpline does not currently respond to trafficking-related calls, which poses a challenge for reporting such cases. In addition, the service is not yet multilingual, though steps are reportedly being taken to address this.

139. As noted in preceding parts of the report, frontline workers often lack adequate knowledge about child trafficking. The National Guidance Unit for Cases of Trafficking in Children provides training focusing on identification and assistance to child victims of trafficking. However, it was reported that there was a lack of systematic training and knowledge on child trafficking, including amongst child protection workers, health professionals and police officers in particular have not received training on child trafficking. An evaluation of the Guidance Unit conducted by the Institute for Social Research in 2023 made several recommendations, including clarifying the mandate of the Guidance Unit, addressing challenges linked to the lack of access to personal data when discussing cases, and continuing training for child protection workers and other actors such as the police.

140. As noted in paragraphs 15 and 84, following amendments to the Child Welfare Act which entered into force on 1 January 2023, children who are presumed to be victims of THB or at risk of THB can be placed in institutions. Under Section 4-5, the Head of the Child Welfare Service may issue a temporary emergency order, which must be confirmed by the board within two weeks. Section 6-6 allows for the placement of a child in an institution, but only as a last resort when less intrusive measures are insufficient to ensure the child's protection. Within the scope of this measure, restrictive and protective measures could be put in place, such as limiting visits, communication and freedom of movement. This order may be put in place for up to six weeks and can be extended up to six weeks at a time through new administrative orders. Children placed under this measure are accommodated at a secret address. As noted in paragraph 84, placements under Sections 4-5 and 6-6 are used very rarely. GRETA stresses that the principle of the best interests of the child should be fully respected at all times when applying Sections 4-5 and 6-6 of the Child Welfare Act.

141. The absence of a specialised shelter for child victims of THB to which they can be referred is an issue of concern.

142. GRETA urges the Norwegian authorities to strengthen the identification of child victims of trafficking, in particular by:

- setting up without further delay an NRM which is in line with trafficked children's specific needs, and provides for information sharing and adequate co-ordination between different actors involved;
- taking proactive measures to identify child trafficking victims without solely relying on police risk assessments;

- providing training to all professionals working with child victims of trafficking;
- setting up a specialised shelter for child victims of THB.

3. Substantive criminal law and procedural law

143. The Convention places on States Parties a series of obligations aimed at enabling the effective prosecution of traffickers and ensuring that they are punished in a proportionate and dissuasive manner. As the implementation of these provisions of the Convention was examined in detail by GRETA during the preceding evaluation rounds, given the focus of the fourth round, particular attention is paid to the notion of “abuse of a position of vulnerability” and its application in case-law. Further, GRETA has decided to examine as part of the fourth evaluation round the application of Article 19 of the Convention on the criminalisation of the use of services of victims of trafficking.

a. Notion of “abuse of a position of vulnerability” in the law and case-law

144. Abuse of a position of vulnerability is an integral part of the international legal definition of trafficking in human beings and is central to any understanding of trafficking.⁸⁵ It is one of the means by which trafficking acts are committed and is relevant to all forms of trafficking and all exploitative purposes. Abuse of a position of vulnerability occurs when “an individual’s personal, situational or circumstantial vulnerability is intentionally used or otherwise taken advantage of, to recruit, transport, transfer, harbour or receive that person for the purpose of exploiting him or her, such that the person believes that submitting to the will of the abuser is the only real or acceptable option available to him or her, and that belief is reasonable in light of the victim’s situation.”⁸⁶

145. The concept of “abuse of a vulnerable situation” forms part of Sections 257 and 258 of the Norwegian CC, which criminalises human trafficking and aggravated human trafficking, respectively. The Norwegian Supreme Court, in a ruling of 2006, indicated that an “overall assessment” is required to determine vulnerability, focusing on the victim’s life situation prior to the exploitation and the conditions of the exploitative situation itself.⁸⁷ The court pointed out that the victim’s “genuine options for choice” are central to the assessment of whether someone is “taking advantage of a vulnerable situation”. Following this ruling, courts evaluate the totality of circumstances in trafficking cases. The victim’s factual possibility to make free and informed choices is diminished by vulnerabilities such as immigration status, poverty or psychological state.

146. The Norwegian authorities have indicated that knowledge of the existence of a position of vulnerability must be proven. They have specified that intent exists when someone commits an act on purpose, with awareness that the act certainly or most likely covers the description of the crime or considers it possible that the action covers the description of the crime and chooses to act even if that were the case.

⁸⁵ See UNODC Issue Paper *Abuse of a position of vulnerability and other “means” within the definition of trafficking in persons*, United Nations, April 2013, p. 3.

⁸⁶ UNODC [Guidance Note](#) on “abuse of a position of vulnerability” as a means of trafficking in persons in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized.

⁸⁷ On 7 February 2006, in case HR-2006-222-A - Rt-2006-111, an Estonian man and a Norwegian man were sentenced to five years and three years’ imprisonment, respectively, for aggravated human trafficking. They had recruited and exploited in prostitution six Estonian women, including a girl, in Trondheim, taking advantage of their vulnerable circumstances. Proceedings: Trondheim District Court - Frostating Court of Appeal LF-2005-71379-2. See KOM Overview of Court Rulings on human trafficking 2024.

147. Section 77 of the CC outlines aggravating circumstances for offences, including when a crime is committed by taking advantage of or deceiving young people, individuals facing severe life challenges, people with learning disabilities or people dependent on the offender. The section also highlights offences targeting people who are defenceless or especially vulnerable to crime. As indicated by the authorities, these aggravating factors are relevant in human trafficking cases, which often involve individuals who are vulnerable due to age, mental health, social circumstances or dependency.

148. There have been a number of THB cases in which the victims' vulnerable situation was taken into account by courts.⁸⁸ By way of example, two Indian men were sentenced by the Supreme Court to, respectively, four years and six months' imprisonment, and three years and two months' imprisonment, for aggravated human trafficking for forced labour (the so-called "Horticulture case").⁸⁹ The defendants brought Indians to Norway to work as seasonal workers. The victims worked long hours for minimal pay, and the court found that the defendants exploited the victims' vulnerable situation. In another case, three Bulgarian men and a woman were convicted by Borgarting Court of Appeal of trafficking and exploiting three Bulgarian women.⁹⁰ The actions had taken place as part of the activities of an organised crime group, in the period 2012-2013. The women were exploited in prostitution in Oslo, by abusing their vulnerable situation and through the use of violence. They came from difficult circumstances in their home country, had no connection to Norway or knowledge of the Norwegian support system, spoke neither Norwegian nor English, had no money of their own and thus had no real and acceptable opportunity to oppose the exploitation. The main perpetrator was sentenced to five years and six months' imprisonment.

149. GRETA was informed on a recent case which involved an abuse of the vulnerability of a Norwegian man.⁹¹ The defendant (a Norwegian man) coerced the victim, who had significant cognitive impairments, into storing and delivering drugs as well as driving an illegal ("pirate") taxi and handing over all earnings. The defendant also forced the victim to create a user profile on Realescort in order to sell sexual services, believing that the victims was bisexual, but in the end the victims never met any customers and the ad was deleted. By coercing and exploiting the victim, the defendant gained at least NOK 500 000 (approximately 44 700 Euros) over a period of approximately 1.5 years. The first-instance court acknowledged the victim's limited capacity and lack of realistic options to escape the situation and treated the case as aggravated human trafficking, with particular emphasis on the fact that the act resulted in significant profits. The prosecutor sought seven years' imprisonment and confiscation of NOK 886 000 (approximately 77 217 Euros). The first-instance court sentenced the defendant to five years' imprisonment (of which three and a half for aggravated human trafficking and the remained for other crimes), noting the severe psychological harm to the victim, who even attempted suicide, as well as confiscation of NOK 786 000 (approximately 64 000 Euros). The victim was awarded NOK 580 000 (approximately 50 452 Euros) as compensation for non-pecuniary and pecuniary damages. The judgment was appealed by the prosecution as well as by the defendant. On 16 January 2025, Borgarting Court of Appeal concluded that the exploitation of the victim in drug distribution did not amount to "forced labour" within the meaning of THB and that the victim's level of cognitive impairment was not so severe as to make it impossible for him to break free. On the other hand, the Court of Appeal found that the exploitation of the victim as a driver of an illegal taxi amounted to human trafficking for the purpose of forced labour and convicted the defendant to four years and six months' imprisonment. No changes were made to the compensation awarded by the first instance court.

150. GRETA welcomes the application of the concept of "abuse of vulnerable situation" in THB cases and considers that the Norwegian authorities should ensure that it is covered by the training provided to investigators, prosecutors and judges.

⁸⁸ See KOM Overview of Court Rulings on human trafficking 2024, available at: <https://www.politiet.no/globalassets/03-rad-og-forebygging/menneskehandel/rettsavgjorelser-om-menneskehandel.pdf>

⁸⁹ Case HR-2017-1124-A.

⁹⁰ LB-2015-169347, 2016-05-10.

⁹¹ Oslo tingrett TOSL-2023-99538, 2024-01-17, and LB-2024-45307, see KOM Overview of Court Rulings on human trafficking 2024.

b. Investigation, prosecution and sanctions

151. In its third evaluation report GRETA urged Norwegian authorities to provide adequate financial and human resources to the specialised police THB units and ensure that they are utilised accordingly. The THB units established in the country's 12 police districts continue to exist, however, the number of staff of these units working on THB cases has been reduced due to other priorities. The police districts operate under the guidance of the Office of the Director of Public Prosecutions but set their own priorities according to local communities' needs. For example, in Bergen, GRETA was informed that although the police district has an annual strategic plan, a shift in priorities occurred in March 2025 due to an increase in youth crime, resulting in redirecting financial and human resources. The authorities have expressed hope that the new National Strategy will restore the investigation of THB as a priority area.

152. The National Criminal Investigation Service (KRIPOS) is a specialised agency which holds responsibility for combating organised and serious crime, collecting national intelligence on human trafficking, supporting local police districts, co-ordinating international police co-operation, and leading the National Police Competence Group on THB. The latter brings together 25 - 40 members from police districts, prosecutors' offices, the National Police Directorate, the National Immigration Service, the National Authority for Investigation and Prosecution of Economic and Environmental Crime, and the National Criminal Investigation Service. In 2024-2025, the Competence Group conducted various activities, including national joint action weeks in March 2024 and April 2025, four full-day seminars, four to five half-day digital seminars, four to five days of digital ad hoc meetings, a two-day study trip to the Hague (including visits to Europol and Eurojust), and several presentations within and outside the police force. The group's activities also involve international co-operation, including two EEA-grant projects on THB in Bulgaria and Romania. The Competence Group was in the process of developing tools, such as a THB investigation guide and updates to the interviewing/interrogation format for THB cases. GRETA welcomes the activities of the National Police Competence Group on THB.

153. Regarding capacity building, the Norwegian Police University College allocated approximately NOK 2 million (approximately 170 000 Euros) to a human trafficking project within the framework of a larger Criminal Network Initiative. The project activities are carried out in close co-ordination with the National Police Competence group on THB. Through the project, a national seminar for police and prosecutors was held in November 2025 on the topic of exploitation of children in criminal activities in the context of THB. Human trafficking content has been integrated into other subject areas, and a small digital curriculum, case-based resources and annual mandatory courses are being developed. An existing human trafficking course is also being updated. The Police Directorate will decide which trainings will be mandatory. However, it was noted that capacity building for police prosecutors is also necessary and is currently lacking.

154. GRETA was informed that the Government supported the police with about NOK 600 million (approximately 52 million Euros) to investigate a broad range of criminal networks, including networks involved in the abuse and exploitation of children.

155. The number of criminal reports filed for THB during the reporting period was 29 in 2021, 32 in 2022, 27 in 2023 and 19 in 2024.⁹² The number of police reports filed for THB has declined significantly compared to previous years. GRETA was informed that this decrease may be linked to the reduced prioritisation of THB.

⁹² See KOM 2024 Annual Status Report, p. 79.

156. In 2021, three criminal cases resulted in convictions for human trafficking, one in the Court of Appeal and two in District Courts. The Court of Appeal verdict and one of the District Court verdicts became final in 2022, and the other District Court verdict resulted in acquittal in the Court of Appeal in 2022. In 2022 and 2023, there were no judgments regarding human trafficking. In 2024, three criminal cases resulted in convictions for human trafficking at first instance, two of which were appealed.⁹³

157. Reference should be made to two cases adjudicated in 2024 in which the offenders exploited Norwegian girls. In the first case, there were eight victims whom the offender met at a youth club and on Snapchat. The perpetrator was sentenced for severe rape; rape with intercourse of children under 14; sexual intercourse with children between 14 and 16; buying sexual services from minors; pimping; and attempted aggravated human trafficking of one victim who was 12 at the time. The latter victim got emotionally attached to the perpetrator who had sexual intercourse with her and persuaded her to sell sex, deciding what sexual services to advertise on Snapchat, what the price would be, and the time and place of meetings. He also decided that they would split the remuneration. The Child Protection Services interfered and took care of the girl just before the first arranged meetings were to take place. The victim gave evidence to the police under the special rules for interviewing children. Her interview was filmed and shown to the court. The District Court put down arguments for a total punishment of 10 years and 10 months, with a deduction of two years due to the perpetrator confessing to all the conditions he was to be sentenced for. The victim was awarded about NOK 380 000 (approximately 33 000 Euros) in compensation for non-pecuniary damages.⁹⁴

158. In the second case, a Norwegian man was sentenced to 15 years' imprisonment with a minimum time of 10 years for a number of aggravated sexual offences against Norwegian girls, one of them for THB. There were 21 victims in this case, the youngest of whom was 12 years old at the time of the crime. The man established contact with the girls on social media platforms, particularly Snapchat. He held a competition on Snapchat where girls could win money or products. To win points, they had to send nude pictures or chat about sexual activities. The perpetrator established a romantic relationship with one of the girls he met online, who was 17 at the time, and subsequently advertised her for prostitution and organised meetings on her behalf on three different online platforms.⁹⁵ The court awarded the victims compensation for non-pecuniary damages of NOK 250 000 (approximately 21 500 Euros).⁹⁶

159. GRETA was informed that the Police organised in the context of the National Police Competence group on THB national action days in April 2025, where the target was South American pimping networks, especially women from Colombia. They checked a total of 31 addresses and encountered 61 persons (54 women and 7 men); 9 women reported receiving help of others with advertisements, travel and accommodation arrangements. ROSA was informed about the action days in advance in order to be prepared for to assist any identified victims and the police district officers who conducted the checks handed out information leaflets from ROSA. GRETA commends the involvement of NGOs in police action days and encourages the authorities to ensure that the involvement of NGOs is sustained.

160. GRETA was informed of an operation carried out by Oslo Police District involving a Nepalese worker whom, after moving from Norway to Portugal, reported having experienced long working hours and poor working conditions while employed at an Indian restaurant in Oslo. He had come to Norway using falsified educational documents from Nepal. He was interviewed in Oslo over two days and the THB hypothesis was assessed. At the time of the GRETA's evaluation visit, he was living with his family in a safe house. In relation to this case, three suspects were reported to be arrested for migrant smuggling. The authorities, including the Police, Labour Inspectorate, Food Safety Authority, Tax Administration, and Norwegian Labour and Welfare Administration, conducted a joint search of a restaurant to collect evidence and seized electronic devices and documents.

⁹³ See KOM Overview of Court Rulings on human trafficking, 2024, p. 81.

⁹⁴ See KOM Overview of Court Rulings on human trafficking, 2024, pp. 26-27.

⁹⁵ See KOM Overview of Court Rulings on human trafficking, 2024.

⁹⁶ Eidsivating Court of Appeal, 7 January 2025 (LE-2024-60673).

161. Another case, reported by the Western Police District in Bergen, concerned a Ukrainian girl who was involved in prostitution in Stavanger in 2023. The facilitators of the prostitution were reportedly from Chechnya, Poland, and Norway, with connections to individuals in Mexico and a main orchestrator based in Russia. The perpetrators used encrypted messaging apps to communicate. A hotel contacted the authorities, triggering an investigation initially treated as a potential THB case, which was later requalified as pimping. The case was heard by Sør-Rogaland District Court in September 2025. The indictment against two of the defendants (a man from Chechnya and a man from Poland) was for aggravated human trafficking of a child. The third defendant (a woman from Poland) was indicted for pimping. Both men were convicted of THB, with imprisonment sentences of, respectively, 3 years and 3 months and 2 years and 9 months. They were both ordered to pay compensation for non-pecuniary damages amounting to NOK 320 000 (approximately 28 160 Euros) and for economic loss, NOK 62 000 (approximately 5 470 Euros). Both men appealed, with the next trial being scheduled for February 2026. The third defendant was acquitted.

162. In its third evaluation report, GRETA urged the Norwegian authorities to ensure that trafficking offences are classified as such every time the circumstances of a case allow this, including cases of trafficking for the purpose of labour exploitation, and that they lead to effective, proportionate and dissuasive sanctions for those convicted. Between 2022 and 2025, the Vest Police District investigated six suspected cases of THB, involving prostitution, prostitution of a child, theft by a child, and forced labour in agriculture. Of these, one case remains temporarily dismissed, while the rest were dismissed completely or reclassified, typically as pimping, due to insufficient evidence. In 2025, an investigation involving a young man selling drugs under pressure from his mother was initially investigated as THB but was requalified during the prosecution.

163. GRETA was informed that the Office of the Director of Public Prosecutions carried out an informal review of all human trafficking cases registered in 2024, according to which the requalification of trafficking cases was rare. Among the cases reviewed, only one was reclassified, from a human trafficking case involving forced labour to a wage theft case. The Office of the Director of Public Prosecutions reported that it is not aware of any broader pattern of such requalification.

164. Some cases of THB involving labour exploitation may be requalified as lesser offences due to lack of knowledge of THB among police prosecutors and judges, and a reluctance among police prosecutors to proceed with cases where the evidence is only based on the victim's statement due to a potentially low success rate.⁹⁷ In such cases, victims can be deprived of several rights, such as access to free legal aid, housing, health support and other benefits linked to the reflection period, as well as access to compensation and a residence permit. Other reasons for possible underuse of the CC provisions for THB related labour exploitation may be a lack of competence among responders, and victims' fear of pressing charges due to possible reprisals.⁹⁸

165. According to lawyers met by GRETA, if the exploitation took place abroad, the Norwegian police does not always forward the information to the police in the country of exploitation. Lawyers also referred to situations where the police quickly closed cases where the exploitation took place in another country and did not inform the victim's lawyer that the case had been closed or requalified. Lawyers provided examples of cases which were investigated as THB but were requalified as pimping, sexual abuse or kidnapping. If the case is qualified as pimping, the person concerned is treated as a witness rather than as a victim, and is not entitled to a lawyer, compensation or residence. Lawyers noted that there is an expectation of a high level of proof for a case to qualify as THB, in particular in cases of labour exploitation. In their comments on the draft GRETA report, the authorities stressed that police information regarding potential THB abroad forms part of the information exchange through KRIPOS and Europol channels.

⁹⁷ Brunovskis, A. & Ødegård, A.M., *Grov utnyttning av utenlandske arbeidere*, Fafo, 2022, available at: <https://www.faf.no/en/publications/grov-utnyttning-av-utenlandske-arbeidstakere>

⁹⁸ Brunovskis, A. & Ødegård, A.M., *Menneskehandel i arbeidslivet*, Fafo, 2019, available at: <https://www.faf.no/zoo-publikasjoner/faf-rapporter/menneskehandel-i-arbeidslivet-2>

166. There are ongoing discussions about the need for introducing a new criminal offence of labour exploitation which does not reach the threshold of THB. Further, GRETA was informed that the Ministry of Justice and Public Security was considering the introduction of legislation addressing exploitation in cases involving the criminalisation of children. In September 2025, the Ministry of Justice and Public Security issued a public consultation note proposing a new provision targeting anyone who, in various ways, involves a person under the age of 18 in a criminal act. The consultation process ended on 1 December 2025 and the issue is now under consideration in the Ministry. GRETA would like to be kept informed of developments in this respect.

167. GRETA is concerned that the investigation of human trafficking cases is not given sufficient resources and attention. The number of cases of human trafficking registered with the police has been decreasing over the years and the number of convictions for THB is low, in particular for trafficking for the purpose of labour exploitation. It would appear that many cases investigated as THB are either dismissed or (re)qualified as lesser offences, such as pimping or labour-related offences. This could be due to the need for further training of prosecutors and judges of the elements of THB, especially with regard to labour exploitation and child criminal exploitation.

168. Recalling the recommendations made in its third evaluation report, GRETA once again urges Norwegian authorities to strengthen the criminal justice response to human trafficking, in particular by:

- ensuring that human trafficking offences are proactively and promptly investigated, regardless of whether a report has been filed or not, making use of all possible evidence gathered through special investigation techniques and financial investigations, and not having to rely mainly on the testimony of victims or witnesses;
- providing adequate financial and human resources to the specialised police THB units and ensuring that they are utilised accordingly;
- further training and sensitising investigators, prosecutors and judges on the offence of trafficking in human beings;
- ensuring that human trafficking offences are prosecuted as such, rather than as other/lesser offences, every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted.

c. Criminalisation of the use of services of a victim

169. There is not provision in Norwegian law on the criminalisation of the use of the services of a victim of THB, with the knowledge that the person is a victim. During the ratification of the Convention, it was considered that the use of these services could be regarded as a crime and punishable under other laws. The Norwegian authorities have noted that, even though it does not comply with the Article 19 of the Convention, the purchase of sexual services is criminalised in Norway in an effort to combat trafficking of human beings for the purpose of prostitution and other forms of sexual exploitation. During the visit, police officers indicated that that there was not much focus on investigating clients.

170. GRETA considers that the Norwegian authorities should adopt a legal provision criminalising the use of all services of a victim of trafficking, with the knowledge that the person is a victim of THB, as stipulated by Article 19 of the Convention.

IV. Addressing human trafficking facilitated by information and communication technology (ICT)

171. Countries monitored by GRETA have reported an increased use of information and communication technologies (ICT) for recruiting and controlling victims of trafficking. In 2022, GRETA conducted a study to assess the extent to which technology impacts trafficking and explore the operational and legal challenges that states face in detecting, investigating and prosecuting online and ICT-facilitated trafficking.⁹⁹ As highlighted by the study, the impact of technology is particularly acute in relation to the recruitment and exploitation of victims, including their control throughout the different stages of the trafficking process. This study highlighted a number of challenges to the identification, investigation and prosecution of THB cases due to the high volume of online activities and the associated high volume of digital evidence, the use of encrypted communications, nicknames and aliases, and the time-consuming process of acquiring evidence from private companies and/or other jurisdictions. At the same time, anti-trafficking stakeholders are using technological innovations to prevent human trafficking, protect victims, and prosecute traffickers. It is therefore essential to invest in human capital and technological tools to harness the potential of ICT for effectively combating human trafficking.

172. According to the Norwegian authorities and NGOs, perpetrators are increasingly using online platforms to recruit and deceive potential victims. They use fake job advertisements and create fake companies. Child exploitation cases involving online activity are on the rise, with most incidents occurring on platforms such as Telegram, followed by Signal. ID-theft and falsified documentation is another method of exploiting people. Norway is a highly digitalised country, enabling residents to register companies, access tax and welfare services, open bank accounts, apply for loans and transfer property using digital IDs. However, this also creates opportunities for exploitation in the labour market, where perpetrators may trade digital IDs, often targeting vulnerable persons.

173. The police employ various technology-based tools to investigate and combat all forms of crime. Intelligence gathering efforts include the use of centralised databases, case mapping, Open-Source Intelligence (OSINT) monitoring, and collaboration with external partners. The National Cybercrime Centre (NC3) at KRIPOS serves as the national knowledge and competence centre for technology-related police tasks. However, there are reportedly no tools specifically designed for combating human trafficking.

174. According to information provided by the Police, a wide variety of investigative methods are used to target trafficking networks. In cases involving South American groups, police officers respond to online advertisements via WhatsApp. Using this method, the police can check the persons advertised and investigate whether they were possible victims of THB. Based on case experience, the police have seen the potential for obtaining information from international money trail investigations, including cryptocurrency exchanges. Police stressed that securing and analysing perpetrators' phones is a crucial step in every investigation.

175. Proactive online measures include the police regularly monitoring platforms advertising sexual services and obtaining reports linked to specific ads through direct communication and court orders. However, removing harmful online content remains a significant challenge. In one case, exploitative images of a girl were shared on a Telegram channel with 10 000 members, but requests to Telegram for the images to be removed went unanswered, and a Ukrainian company also failed to act when asked to take down the exploitative material. Reportedly, there is no specific co-operation with the internet companies for THB cases.

176. Norwegian police officers have also participated in Europol-led web crawler sprints, focusing on South American and Ukrainian activity.

⁹⁹ Paolo Campana, Online and Technology-Facilitated Trafficking in Human Beings, Council of Europe: <https://rm.coe.int/online-and-technology-facilitated-trafficking-in-human-beings-full-rep/1680a73e49>, published in April 2022.

177. GRETA has received information indicating a growing trend among young people to create and sell sexual content online, which is increasingly perceived as a normalised and accessible means of generating income. Children and young people, both boys and girls, are increasingly viewing the sale of sexual content online as a way to earn income and pocket money, using platforms such as Snapchat and OnlyFans. Influencers, peers and social networks play a significant role in encouraging this practice. Their popularity is reinforced by the availability of digital payment systems such as MobilePay and Vipps (a Norwegian payment service), which enable anonymous financial transactions from adults, frequently without the knowledge of parents or guardians. In many instances, families only become aware of such activities by chance, for example when observing unusual transfers to a child's bank account.

178. In response, the authorities have initiated the development of educational tools and awareness-raising programmes aimed at informing children and young people of the risks associated with producing and selling sexual content. Furthermore, the Government has launched a white paper on safer digital childhood and opened a public consultation on a draft law banning social media use for children under 15. The aim is to protect children from potential harms linked to social media, including exposure to criminal activity. The proposal also introduces a legal definition of "social media platform" to clarify which services would be subject to the age restriction. In their comments on the draft GRETA report, the authorities indicated that the white paper will be considered by Parliament in March 2026. The legislative proposal on social media use has been the subject of public consultation and work on this proposal is ongoing.

179. Measures to raise awareness of the risks of technology-facilitated THB are being taken by various agencies and civil society organisations, such as ECPAT Norway which organises online courses for school pupils, teachers and parents as well as campaigns. A petition was launched in 2025 by ECPAT, LightUp, Child Safety Online and a coalition of over 60 organisations, asking the Norwegian government to introduce a duty for Norwegian service providers to report if they detect that their services are used for storage or distribution of illegal sexual assault material that involves children. Further, they call on the government to introduce a duty to prevent and remove any assault material, and to prioritise the use of technology specifically designed for the tracing and removal of illegal sexual content involving children.

180. Norway is a party to the Council of Europe Convention on Cybercrime (Budapest Convention) and has signed the Second Additional Protocol on enhanced co-operation and disclosure of electronic evidence.

181. GRETA welcomes the above-mentioned activities and plans, and considers that the Norwegian authorities should:

- strengthen the capacity to detect and investigate cybercrime offences and develop further measures specifically aimed at preventing ICT-facilitated THB by investing in capacity building of law enforcement officers, labour inspectors and financial police officers, and digital tools to conduct proactive investigations, including the use of cyber-patrolling, undercover online operations and social network analysis;
- prioritise action against THB in inter-agency co-operation in the investigation of technology-facilitated offences, including the online recruitment and exploitation of children, by enhancing digital monitoring tools and engaging proactively with ICT companies;
- develop data-sharing procedures and co-operation protocols with companies holding relevant data, including social network and gig-economy companies as well as rental platforms to foster the timely provision of information. Such protocols/procedures should clarify the legal requirements under which ICT companies, ISPs and content hosts operate, designate a contact point within companies, and clarify the national agencies responsible for specific actions, e.g. requesting evidence or taking down THB and sexual abuse related content.

V. Follow-up topics specific to Norway

1. Recovery and reflection period (Article 13)

182. In its first, second and third reports, GRETA urged the Norwegian authorities, in compliance with the obligations under Article 13 of the Convention, to ensure that all possible victims of trafficking are offered a recovery and reflection period, without having to apply for it themselves, and all forms of assistance and protection that go with it regardless of whether a temporary residence permit and access to assistance can be secured on other grounds.

183. There have been no changes to the legal provisions concerning the recovery and reflection period, which is provided for in section 8-3, paragraph 1, of the Immigration Regulations.¹⁰⁰ Pursuant to this provision, a foreign victim may be granted a six-month reflection period if there are reasons to believe that he/she is a victim of human trafficking and is prepared to accept help and participate in measures offered by the authorities. The UDI grants the victim a residence permit for the duration of the reflection period, which is non-renewable. During the reflection period, if the victim has applied for asylum, the asylum case is put on hold until the applicant contacts the UDI to have the asylum case re-opened. After the expiry of the reflection period, victims can continue with the asylum procedure.

184. The number of persons who receive a reflection period continues to be low. According to the latest KOM annual status report for 2024, the UDI made 18 decisions on reflection periods in 2024, granting 17 temporary six-month residence permits under section 8-3, paragraph 1, of the Immigration Regulations. The number of persons granted a reflection period was 8 in 2021, 9 in 2022 and 10 in 2023.

185. According to NGOs, victims of THB are not interested in being given a reflection period for a variety of reasons. In order to be granted this period, victims have to submit an application in person to the police (which forwards it to the UDI), but many of them are afraid to go to the police due to the absence of adequate protection measures to ensure the victims' safety. Further, the six-month time-limit of the residence permit affects the victims' ability to get a job, since employers are less likely to engage them short term. The fact that the asylum procedure is interrupted during the reflection period is another dissuading factor. GRETA was informed that the new National Strategy against THB does not specifically address the issue of the reflection period. However, one of the measures in the new National Strategy against THB is to safeguard the rights of presumed victims and ensure their access to those rights, including to residence permits. For this purpose, the authorities have indicated that regulatory changes or additional actions shall be evaluated to secure the rights protected under the Convention.

186. GRETA notes that Norwegian legislation does not construe the recovery and reflection period as provided for in Article 13 of the Convention. GRETA refers to its 2024 Guidance Note on the recovery and reflection period, which states that the only pre-requisite for granting the recovery and reflection period is that there are reasonable grounds to believe that a person is a victim of trafficking.¹⁰¹ Therefore, there should be no other conditions to the entitlement of presumed victims of trafficking to the reflection period.

187. GRETA once again urges the Norwegian authorities to implement its previous recommendations concerning the recovery and reflection period, by ensuring that it is in compliance with Article 13 of the Convention and that all presumed foreign victims of human trafficking can benefit from its protective scope and the assistance measures provided during it.

¹⁰⁰ Regulations of 15 October 2009 on the Entry of Foreign Nationals into the Kingdom of Norway and their Stay (Immigration Regulations), <http://www.regjeringen.no/upload/JD/Dokumenter/Forskrifter/Immigrationregulations.pdf>

¹⁰¹ <https://rm.coe.int/guidance-note-on-recovery-and-reflection-period-group-of-experts-on-ac/1680b1a3ca>

2. Compensation (Article 15)

188. In the third report on Norway,¹⁰² GRETA urged the Norwegian authorities to facilitate access to state compensation in cases in which no criminal proceedings were instituted against the alleged perpetrator, even when the perpetrator does not give his/her consent to have the compensation claim decided by the Compensation Authority.

189. The new Act on Compensation for Victims of Violent Crimes came into force on 1 January 2023. The Act covers Section 257 (human trafficking), Section 258 (aggravated human trafficking) and Section 259 (slavery) of the CC. Compensation can be obtained in respect of crimes committed when the perpetrator and the victim were in Norway and within Norwegian jurisdiction, and where the victim, at the time of the incident, was living in Norway and the criminal case is being heard in a Norwegian court. Loss of income, including income from prostitution, is eligible for compensation. Importantly, compensation may be granted even if there is no conviction and without the perpetrator's consent. It is mandatory that the criminal act is reported to the police, which implies that the applicant must provide a statement to the police including details of the crime, the perpetrator's name and any other relevant information. If a perpetrator is convicted and ordered to pay compensation but fails to do so within two weeks of the verdict, the Compensation Authority will automatically pay the victim the court-ordered amount and then seek to recover the funds from the perpetrator.

190. While welcoming the adoption of the new Act on Compensation for Victims of Violent Crimes, GRETA notes that there are some concerns about its application in THB cases. If a case is requalified, for example, from trafficking to pimping, the victim may no longer be eligible for compensation under the Act. Further, if a victim is exploited in another country, they may not be eligible for compensation. Questions also remain about how victims who leave Norway after the reflection period can access compensation. Another issue raised is that perpetrators may gain access to sensitive information from compensation cases, such as victims' medical records, raising privacy concerns. As a result, lawyers are uncertain about how much evidence to include when submitting compensation claims.

191. There are no statistics on the number of victims of THB who were awarded compensation, but the examples of recent convictions provided in paragraphs 149, 157 and 158 indicate that compensation is awarded to the victims.

192. GRETA was informed that the new Act on Compensation for Victims of Violent Crimes will be evaluated between January 2025 and June 2026.

193. While welcoming the new Act on Compensation for Victims of Violent Crimes, GRETA considers that the Norwegian authorities should make additional efforts to guarantee effective access to compensation for victims of THB, in particular by ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain from the exploitation of the victim, is part of the criminal investigations with a view to supporting compensation claims in court.

194. Further, GRETA invites the Norwegian authorities to collect statistics on the number of victims of THB granted compensation by court decision or by the State.

¹⁰² See GRETA's 3rd evaluation report on Norway, paragraph 75.

3. Legal assistance and free legal aid (Article 15)

195. The provisions on legal assistance and free legal aid have not changed.¹⁰³ Victims of trafficking are entitled to receive up to three hours of free legal counselling, irrespective of their economic situation and immigration status, to help them decide whether they want to file a criminal report with the police. If needed, the lawyer can apply to the competent county governor's office for additional hours of free legal counselling to be granted. Further, a victim is entitled to have a lawyer appointed *ex officio* by the court for the duration of the criminal proceedings or can ask to have another, specialised, lawyer, usually provided by specialised NGOs. The lawyer is paid per hour for "reasonable and necessary work." However, if the case is dismissed or requalified as a lesser offence, such as pimping, the right to free legal aid is, as a rule, lost. Moreover, victims of violence, including victims of trafficking, are entitled to five hours of free legal aid when applying for state compensation.

196. In practice, NGOs frequently assist presumed victims and ensure they are assigned a specialised lawyer. According to specialised lawyers met by GRETA, access to legal aid is problematic if a case is not qualified as THB or is requalified as another offence, such as pimping. Lawyers also referred to cases in which legal aid was denied even though the case was identified as human trafficking by specialised NGOs. After appealing, legal aid was eventually granted.

197. GRETA was informed that there are no national standards for lawyers offering legal aid to trafficking victims. The new Attorney Act entered into force on 1 January 2025. It provides that lawyers must act with professional skill and must have sufficient knowledge on the area of law on which they give advice. The new Act establishes a general requirement for post-qualification education for all lawyers.

198. GRETA considers that the Norwegian authorities should take further steps to ensure trafficking victims' access to legal assistance and free legal aid, in particular by:

- ensuring that free legal counselling is provided to a sufficient extent and by lawyers who have received training on THB;
- putting in place a system to certify lawyers who are qualified to provide legal aid to victims of trafficking and ensuring that trafficking victims are systematically appointed a specialised lawyer;
- encouraging the Bar Associations to offer training and specialisation of lawyers to provide legal aid to trafficking victims.

4. Non-punishment provision (Article 26)

199. In its third report, GRETA was concerned that the non-punishment provision of the Convention was not sufficiently and consistently applied by the prosecution and the courts and made several recommendations to the Norwegian authorities to ensure compliance with this provision in practice.¹⁰⁴

200. Norwegian law does not have a specific provision on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they have been compelled to do so. Section 17 of the CC ("Necessity") provides that "an act which would otherwise be punishable, is lawful when: a) it is committed to save life, health, property or other interests from a risk of harm which cannot be averted in another reasonable manner, and b) this risk of harm is far greater than the risk of harm associated with the act." Further, section 61 of the CC ("Waiver of sentencing") gives courts the possibility of not imposing a sentence when there are exceptional reasons for doing so, and following 2022 amendments to section 62a of the CPA, the prosecution service has a discretionary right to drop the case if prosecution is not in the public interest. The non-punishment principle has been specifically mentioned in the Director of Public

¹⁰³ See GRETA's 3rd report on Norway, paragraphs 46-48.

¹⁰⁴ See GRETA's 3rd report on Norway, paragraph 104.

Prosecutions' general annual guidelines for priorities (most recently in 2024). The guidance underlines that the authorities are obliged to safeguard victims of THB, and that suspects of crime may themselves, under certain circumstances, be victims of THB. In this context, Article 26 of the Council of Europe Anti-trafficking Convention was explained. The authorities indicated that in the recent criminal case mentioned in paragraph 149, the case against the person with cognitive impairments who had distributed drugs was dismissed by the prosecution with reference to the non-punishment principle.

201. Due to the absence of a specific non-punishment provision in Norwegian legislation, it may happen that victims of THB are punished for unlawful acts they were compelled to commit by the traffickers.¹⁰⁵ The new National Strategy against Human Trafficking states that, in practice, the application of the non-punishment principle can be challenging for criminal justice professionals and it is unclear to what extent this principle is followed. The Strategy indicates that it should be considered whether there is a need for changes to the CC and the CPA in several areas, including further codification or other regulation of the implementation of the non-punishment principle.

202. According to lawyers and NGOs met by GRETA, the non-punishment principle is not sufficiently and consistently applied by the prosecution and the courts due to failure to identify victims and gaps in inter-agency co-operation. GRETA was provided with several examples of victims being prosecuted for drug-related or other offences (e.g. robbery) which they were compelled to commit. Reference was made to a woman who was sentenced to four years' imprisonment for transporting drugs into Norway. Despite her lawyer claiming that she was a victim of trafficking and that her return to Nigeria posed risks, the interlocutors alleged that no verification of her status as a potential victim of trafficking was conducted and she was forcibly returned. They also claimed that children involved in drug-related cases face very high thresholds to be identified as victims of trafficking. Failure to properly identify cases of trafficking results in situations where the same person is prosecuted for a criminal offence and called as a witness in a related case without recognition that he/she may be a victim in the latter case. GRETA's interlocutors stated that there appear to be no cases where a conviction was overturned because the perpetrator was found to be a victim of trafficking.

203. GRETA refers to a case which was brought to its attention during the visit and has also been the subject of a communication by the UN Special Rapporteur on trafficking in persons, especially women and children, to the Norwegian authorities.¹⁰⁶ The case concerns a Vietnamese man who had been recruited by another Vietnamese man to work on a farm in Norway and, after receiving a six-month visa as a seasonal worker, arrived in Norway in April 2019. In November 2020, he was found working on a cannabis plantation within a residential building and was arrested by the police. While the criminal investigation concerning drug-related offences was ongoing, he was referred by his lawyer to the NGO ROSA, which considered that he was a possible victim of human trafficking. Shortly afterwards, the police opened an investigation into a possible human trafficking offence and the man concerned was granted a six-month reflection period by the UDI, extended by another six-month period. During this time, he remained in detention and criminal proceedings were pursued against him for drug production and illegal stay in Norway. Vestre Innlandet District Court did not find that there was evidence to rule out that the person concerned was a victim of human trafficking and that he felt compelled to work on the cannabis plantation. However, according to the judgment issued on 28 October 2021, "even if the matter is judged to be human trafficking, the court finds it proven beyond any reasonable and sensible doubt that the degree of coercion and exploitation in the case is not significant".¹⁰⁷ The first instance conviction was upheld by the Eidsivating Court of Appeal, in a judgment dated 28 March 2022, which noted that the police was

¹⁰⁵ Rudolf Christoffersen, *Har ofre for menneskehandel rett til å slippe straffefølgning for straffbare handlinger de har begått som ledd i utnyttelsen?*, available at:

<https://www.bing.com/ck/a?!&p=054598fab7195b7bcc96b8b941166df4c1272a833e2ed93686c69329d7dd70f0JmltdHM9MTc2NDQ2MDgwMA&ptn=3&ver=2&hsh=4&fclid=098a4c22-063c-61aa-35a2-5a5007d06082&psq=rudolf+christoffersen+menneskehandel+Festschrift+&u=a1aHR0cHM6Ly93d3cucmlrc2FkdM9rYXRlbi5uby93cC1jb250ZW50L3VwbG9hZHMvMjAyMC8wMi9GZXN0c2tyaWZOLXRpbC1Ub3ltQWtzZWwtQnVzY2gtc2lkZS0xMjctbS52LXN0YXRzYWVWR2b2thdC1SdWRVbGZDaHJpc3RvZmZlcnNlbnMtYXJ0aWtrZWwucGRm>

¹⁰⁶ <https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=30381>

¹⁰⁷ Case number 21-106986 WITH-TVIN/TGJO.

investigating whether the defendant was a victim of human trafficking and the investigation had not ended at the time the judgment was issued, as well as that assistance had been sought from the NGO ROSA and that a reflection period had been issued. The Court of Appeal considered whether section 17 of the CC should be applied to waive the sentence, but concluded that “there may be situations where the degree of coercion is so prominent and massive that the perpetrator should not be punished, however, this is not the situation in the case in question”. The Court of Appeal placed no credence in the defendant’s explanation that he was in a coercive situation at the time of the criminal circumstances and concluded that the overall evidence provided grounds to rule out that he was a victim of human trafficking.¹⁰⁸ The Court based its decision on, *inter alia*, witness statements that the man had left the farm where he was initially employed because he was dissatisfied with his work duties, and the fact that that he had made several money transfers to his wife in Vietnam, and therefore had earned sufficient money to return to Vietnam if he wanted to. The fact that the specialised anti-trafficking NGO ROSA had assumed that he may have been subjected to human trafficking was not deemed sufficient to change the Court’s assessment. Following his release from prison after serving an imprisonment sentence of three years, the person concerned applied for asylum, invoking fear of reprisals upon return. The application was rejected by the Asylum Court and in September 2025 he was removed from Norway.

204. The above-mentioned case illustrates the challenges in assessing the scope of the non-punishment principle in situations where indicators of human trafficking coexist with serious criminal offences. In the case of Norway, these challenges are increased by the lack of a victim identification procedure and the lack of a specific provision for the non-punishment of victims of trafficking. In GRETA’s view, the possibility to apply the general criminal law provision on “necessity” cannot be considered as an appropriate response because it is narrower in scope than the non-punishment principle. GRETA refers to the judgment of the European Court of Human Rights in the case of *V.C.L. and A.N. v. United Kingdom*, which emphasized the importance of the non-punishment principle for state compliance with the positive obligation to protect victims or potential victims of human trafficking enshrined in Article 4 of the European Convention on Human Rights (ECHR). The Court recognized that prosecution may conflict with the State’s duty to take operational measures to protect a victim, or potential victim, “where they are aware, or ought to be aware, of circumstances giving rise to a credible suspicion that an individual has been trafficked”. The Court emphasized that the early identification by individuals trained and qualified to deal with victims of trafficking was of ‘paramount importance’ for the prosecution of such a victim to demonstrate respect for the freedoms guaranteed by Article 4 of ECHR.¹⁰⁹ In the Court’s view “once a trafficking assessment has been made by a qualified person, any subsequent prosecutorial decision would have to take that assessment into account. While the prosecutor might not be bound by the findings made in the course of such a trafficking assessment, the prosecutor would need to have clear reasons which are consistent with the definition of trafficking contained in the Palermo Protocol and the Council of Europe Anti-Trafficking Convention for disagreeing with it”.¹¹⁰

205. GRETA urges the Norwegian authorities to take measures to ensure compliance with the non-punishment provision, including by:

- ensuring that victims of THB are promptly identified as such, in any event before being convicted of offences they were compelled to commit;
- encouraging prosecutors to be proactive in establishing whether an accused person is a potential victim of trafficking, and to consider that, having been trafficked, the culpability of the victim may be diminished, or even removed entirely;

¹⁰⁸ Case number 21-180317AST-ELAG/

¹⁰⁹ *V.C.L. and A.N. v United Kingdom*, paragraph 160.

¹¹⁰ *V.C.L. and A.N. v United Kingdom*, paragraph 162.

- ensuring that all negative consequences faced by victims of THB, such as detention, deportation, entry bans or delays in seeking legal residence in Norway, are lifted, including in cases where their victimhood has only been recognised after they were deported;
- adopting a specific legal provision on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they were compelled to do so.

VI. Conclusions

206. Since the publication of GRETA's third report on Norway on 8 June 2022, progress has been made in several areas.

207. In March 2025, the Norwegian National Human Rights Institution was assigned the role of independent National Rapporteur on Trafficking in Human Beings, Violence against Women and Domestic Violence. The new National Strategy against Human Trafficking (2025-2030), which was launched on 28 May 2025, refers to the obligations under the Council of Europe Anti-Trafficking Convention and addresses previous GRETA recommendations. The new Act on Compensation for Victims of Violent Crimes, which came into force on 1 January 2023, makes it possible for victims of human trafficking to receive compensation from the state in case a convicted perpetrator fails to pay the compensation ordered by a court. Further, amendments made to the Working Environment Act and the introduction of the criminal offences of wage theft and gross wage theft strengthen the protection from are exploitation of migrant workers. Amendments have also been made to the Child Welfare Act to strengthen the protection from child and forced marriages.

208. GRETA welcomes these positive developments in Norway. However, despite the progress achieved, several issues continue to give rise to concern. A certain number of recommendations made repeatedly by GRETA in its preceding reports have not been implemented or have been only partially implemented. In this report, GRETA once again urges the Norwegian authorities to take action in the following areas:

- Identification of victims (Article 10 of the Convention). The Norwegian authorities should set up a formalised National Referral Mechanism (NRM) which defines the roles and responsibilities of all frontline actors who may come into contact with victims of trafficking, and apply the procedures to all victims, regardless of the setting in which they are identified. Particular attention should be paid to the identification of victims of trafficking among asylum seekers and the screening of irregular migrants about to be returned for indicators of human trafficking, especially among groups who may be considered at risk, such as persons engaged in prostitution.
- Recovery and reflection period (Article 13 of the Convention). The Norwegian authorities should ensure that the recovery and reflection period is compliant with Article 13 of the Convention and that all presumed foreign victims of human trafficking can benefit from its protective scope and the assistance measures provided during it.

209. Given that these recommendations have been made repeatedly, their priority implementation is requested and will be followed up as part of the monitoring of the implementation of the Convention.

210. As regards the thematic focus of the fourth evaluation round, which is on vulnerabilities to trafficking in human beings, the Norwegian authorities have noted that the personal, situational and contextual situation of foreign women in prostitution places them in the highest position of vulnerability. Furthermore, migrant workers are identified as a vulnerable group, in particular workers in labour-intensive and lower-skilled sectors, such as agriculture, construction, fishing, cleaning, hospitality, transport and food delivery platforms. The authorities have also acknowledged the particular vulnerability of children, including unaccompanied and separated children, to human trafficking for different forms of exploitation, including criminal exploitation.

211. While welcoming the measures taken by the Norwegian authorities to prevent trafficking through measures addressed at vulnerable groups and to provide assistance to vulnerable victims, GRETA has identified a number of areas of concern which require further action. The following issues should be addressed as a matter or priority:

- reduce the vulnerability of persons engaged in prostitution to human trafficking, in particular by raising their awareness of the risks of human trafficking and the support services available to victims, developing exit programmes for persons wishing to leave prostitution, and further supporting migrant, refugee and asylum-seeking women to access vocational training, education and employment;
- address the vulnerability of migrant workers to human trafficking and exploitation, including by strengthening the Working Environmental Act in order to clearly define the legal framework for deduction of costs, ensure that wages are paid monthly to all migrant workers, and make the wage guarantee system accessible to all migrant workers. The authorities should also introduce more frequent controls and stronger sanctions for employers who operate with illegal agreements, conditions and contracts, and provide clear information to businesses about their responsibilities when hiring migrant workers through recruiters that double as facilitators/supervisors;
- reduce the vulnerability of children to human trafficking in all its forms, including through raising awareness of the risks of recruitment and exploitation through internet/social networks, ensuring consistent use of the protective measures under the Child Welfare Act, and strengthening monitoring and follow-up mechanisms for unaccompanied children and improve the process of their safe transitioning into adulthood.

212. Moreover, GRETA stresses the need to strengthen the criminal justice response to human trafficking, including by providing adequate financial and human resources to the specialised police units, ensuring that human trafficking offences are proactively and promptly investigated, and providing further training to investigators, prosecutors and judges.

213. GRETA also calls on the Norwegian authorities to take measures to ensure compliance with the non-punishment provision, including by ensuring that victims of human trafficking are promptly identified as such, encouraging prosecutors to be proactive in establishing whether an accused person is a potential victim of trafficking, and adopting a specific legal provision on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they were compelled to do so.

214. GRETA welcomes the steps taken by the Norwegian authorities to strengthen online safety and tackle technology-facilitated trafficking, including the use of technology-based tools to target trafficking networks and the awareness-raising activities that have been organised. In order to address the routine use of ICT to recruit and exploit victims of trafficking, the Norwegian authorities should further invest in capacity building and digital tools to conduct proactive investigations of human trafficking cases, develop data-sharing procedures with companies holding relevant data, and developing targeted digital safety and prevention initiatives for children and young people.

215. GRETA invites the Norwegian authorities to keep it regularly informed of developments as regards the implementation of the Convention. GRETA trusts that there will continue to be a political commitment in Norway to sustain the efforts to combat human trafficking by following the human-rights based approach of the Convention, and looks forward to continuing the dialogue with the Norwegian authorities and civil society.

Appendix 1

Statistics on victims and criminal cases of THB in Norway in the period 2021-2024

The data presented in the table is not directly comparable across States Parties to the Convention due to variations in the methodologies used for data collection.

	2021	2022	2023	2024
Number of presumed victims receiving assistance ¹¹¹	197	176	216	183
Investigations	29	32	27	19
Prosecutions	35	20	38	20
Convictions	3	0	0	3

¹¹¹ The number includes both newly detected victims and victims receiving assistance from previous years.

Appendix 2

List of GRETA's conclusions and proposals for action

(the position of the proposals for action in the text of the report is shown in parentheses)

Topics related to the fourth evaluation round of the Convention

Prevention of trafficking in human beings

- GRETA invites the Norwegian authorities to set up a trafficking survivors' advisory council (paragraph 29).

Measures to prevent the vulnerability of specific groups to trafficking in human beings

Vulnerabilities of persons engaged in prostitution and related to the gender dimension of human trafficking

- GRETA considers that the Norwegian authorities should take further steps to reduce the vulnerability of persons engaged in prostitution to human trafficking, in particular by:
 - raising awareness among this group of the risks of human trafficking and the support services available to victims;
 - developing exit programmes for persons wishing to leave prostitution;
 - further supporting migrant, refugee and asylum-seeking women to access vocational training, education and employment;
 - developing targeted digital safety and prevention initiatives for young people (paragraph 37).

Migrant workers

- While welcoming the efforts of the Norwegian authorities and civil society to prevent the exploitation of migrant workers through legislative changes, information and training, as well as the through work of the Service Centres for Foreign Workers, GRETA notes with concern that there are gaps which increase the vulnerability of migrant workers to THB and exploitation. Referring to GRETA's Guidance Note on combating trafficking for labour exploitation and the Council of Europe Committee of Ministers' Recommendation to Member States CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, GRETA considers that the Norwegian authorities should take further steps to prevent THB of migrant workers, in particular by:
 - proactively providing information to migrant workers, in a language they can understand, about the Norwegian labour market, their rights and employment conditions, support services, grievance mechanisms and access to remedies, both prior to leaving their home countries and on arrival in Norway. This information needs to be disseminated in a way that is accessible for persons with limited digital access and digital skills;
 - providing training on trafficking in human beings to labour inspectors and other relevant officials, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB for the purpose of labour exploitation;
 - ensuring that migrant workers have access to reporting mechanisms and effective anonymous complaint mechanisms so that victims of abuse or exploitation can submit their case without fear of reprisals;

- strengthening existing laws and policies to ensure that they are aligned with the ILO Protocol of 2014 to the Forced Labour Convention and the ILO General Principles and Operational Guidelines for Recruitment, including banning recruitment fees by law in Norway;
 - strengthening the Working Environmental Act in order to clearly define the legal framework for deduction of costs, ensure that wages are paid monthly to all migrant workers, and make the wage guarantee system accessible to all migrant workers;
 - introducing more frequent controls and stronger sanctions for employers who operate with illegal agreements, conditions and contracts, and for the use of informal or unapproved actors (middlemen) in the labour provider space;
 - providing clear information to businesses about their responsibilities when hiring migrant workers linked to using recruiters that double as facilitators/supervisors and clarifying employment responsibilities (paragraph 59);
- GRETA considers that the Norwegian authorities should take further steps to ensure that the due diligence legislation is effectively applied to combat THB, in particular by:
- providing more information and knowledge exchange about the Transparency Act and the framework that underpins it to ministries, agencies, the judicial system, NGOs, trade unions and other bodies providing support to victims of labour exploitation;
 - ensuring that businesses map, prevent and address the risks of THB in their operations and supply chains (paragraph 60).

Asylum seekers and refugees

- GRETA welcomes the attention to the detection of vulnerabilities of THB amongst asylum seekers and refugees, and considers that the Norwegian authorities should:
- continue raising awareness of asylum seekers and refugees of the risks of human trafficking, including by ensuring that materials on trafficking in human beings are made available in multiple languages;
 - implement capacity-building measures for the border police to enable them to detect THB indicators at the border, and ensure that a proper vulnerability assessment is carried out;
 - facilitate greater access to the labour market, vocational training and Norwegian language courses for asylum seekers, to prevent them from becoming vulnerable to exploitation and THB (paragraph 77).

Children and young people

- While commending the measures implemented to prevent child trafficking and the work of the National Guidance Unit for Cases of Trafficking in Children, GRETA considers that the Norwegian authorities should take additional steps to:
- raise children's awareness of their rights and the risks of human trafficking, including recruitment and abuse through internet/social networks, and how to report abuse, paying particular attention to children in vulnerable situations;
 - mainstream the prevention of THB through the national educational system in order to raise children's awareness of the risks of human trafficking by integrating age-appropriate content into school curricula, promoting digital and media literacy, training teachers, involving NGOs and peer educators, and empowering school counsellors to identify and respond to trafficking risks;
 - ensure that the National Guidance Unit for Cases of Trafficking in Children is provided with sufficient funding to keep the focus on the prevention of child trafficking;

- establish mandatory and regular training on THB (including trafficking indicators and procedures) for child welfare workers, healthcare providers, and other frontline professionals to improve early detection of vulnerabilities and appropriate responses;
- strengthen monitoring and follow-up mechanisms for unaccompanied children, including those who go missing from reception facilities, and clarify the responsibilities of local child welfare services in such case;
- develop protocols and tools for identifying and referring children at risk of trafficking and grey-zone exploitation (e.g. honour-based violence, familial control), ensuring consistent use of the protective measures under the Child Welfare Act;
- take steps to improve the process of safe transitioning into adulthood of unaccompanied children in order to decrease vulnerabilities and mitigate any risk of been trafficked (paragraph 97).

Persons with disabilities

- GRETA considers that the Norwegian authorities should conduct research into the vulnerabilities of persons with disabilities to trafficking in human beings and develop preventive measures specifically aimed at this group (paragraph 104).

LGBTI people

- GRETA welcomes the attention paid by research to the vulnerabilities of LGBTI persons and considers that the Norwegian authorities should continue taking steps to address their vulnerabilities to trafficking in human beings, in close co-operation with civil society organisations (paragraph 107).

Identification of victims of THB

- While acknowledging the steps taken since the third report, GRETA once again urges the Norwegian authorities to improve the identification of victims of THB, in particular by:
 - setting up a formalised NRM which defines the roles and responsibilities of all frontline actors who may come into contact with victims of THB, in order to improve clarity and legal certainty, and applying the procedures to all victims, regardless of the setting in which they are identified;
 - co-operating with specialised NGOs to improve the proactive detection of victims;
 - improving the identification of victims of trafficking among asylum seekers, migrants and persons placed in detention centres through the provision of systematic training and guidance to border police officers, asylum case workers, staff in asylum reception centres and prison staff;
 - screening irregular migrants about to be returned for indicators of THB, especially among groups who may be considered at risk, such as persons engaged in prostitution;
 - reviewing the legislation limiting the time period for appealing negative asylum decisions with a view to allowing sufficient time for identifying victims of trafficking and ensuring the effective exercise of the right to judicial review (paragraph 124).

Assistance to victims

- Reiterating the recommendations made in its third report, GRETA considers that Norwegian authorities should further develop and strengthen the assistance measures offered to victims of THB, and in particular:
 - provide longer-term, sustainable and sufficient funding for NGOs that provide assistance to victims in order to ensure the continuity of victims' assistance, for as long as required by the victim's individual situation;
 - taking into account the increasing number of cases of THB for labour exploitation and male victims, guarantee a sufficient number of accommodation places for victims of trafficking, including outside Oslo;
 - provide safe accommodation places for all victims who need them, including trans gender persons;
 - improve timely access to health care and psychological support for victims of THB (paragraph 136).

Identification of, and assistance to, child victims of trafficking

- GRETA urges the Norwegian authorities to strengthen the identification of child victims of trafficking, in particular by:
 - setting up without further delay an NRM which is in line with trafficked children's specific needs, and provides for information sharing and adequate co-ordination between different actors involved;
 - taking proactive measures to identify child trafficking victims without solely relying on police risk assessments;
 - providing training to all professionals working with child victims of trafficking;
 - setting up a specialised shelter for child victims of THB (paragraph 142).

Notion of "abuse of a position of vulnerability" in the law and case-law

- GRETA welcomes the application of the concept of "abuse of vulnerable situation" in THB cases and considers that the Norwegian authorities should ensure that it is covered by the training provided to investigators, prosecutors and judges (paragraph 150).

Investigation, prosecution and sanctions

- Recalling the recommendations made in its third evaluation report, GRETA once again urges Norwegian authorities to strengthen the criminal justice response to human trafficking, in particular by:
 - ensuring that human trafficking offences are proactively and promptly investigated, regardless of whether a report has been filed or not, making use of all possible evidence gathered through special investigation techniques and financial investigations, and not having to rely mainly on the testimony of victims or witnesses;
 - providing adequate financial and human resources to the specialised police THB units and ensuring that they are utilised accordingly;
 - further training and sensitising investigators, prosecutors and judges on the offence of trafficking in human beings;

- ensuring that human trafficking offences are prosecuted as such, rather than as other/lesser offences, every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted (paragraph 168).

Criminalisation of the use of services of a victim

- GRETA considers that the Norwegian authorities should adopt a legal provision criminalising the use of all services of a victim of trafficking, with the knowledge that the person is a victim of THB, as stipulated by Article 19 of the Convention (paragraph 170).

Addressing human trafficking facilitated by information and communication technology (ICT)

- GRETA welcomes the above-mentioned activities and plans, and considers that the Norwegian authorities should:
 - strengthen the capacity to detect and investigate cybercrime offences and develop further measures specifically aimed at preventing ICT-facilitated trafficking in human beings by investing in capacity building of law enforcement officers, labour inspectors and financial police officers, and digital tools to conduct proactive investigations, including the use of cyber-patrolling, undercover online operations and social network analysis;
 - prioritise action against human trafficking in inter-agency co-operation in the investigation of technology-facilitated offences, including the online recruitment and exploitation of children, by enhancing digital monitoring tools and engaging proactively with ICT companies;
 - develop data-sharing procedures and co-operation protocols with companies holding relevant data, including social network and gig-economy companies as well as rental platforms to foster the timely provision of information. Such protocols/procedures should clarify the legal requirements under which ICT companies, ISPs and content hosts operate, designate a contact point within companies, and clarify the national agencies responsible for specific actions, e.g. requesting evidence or taking down THB and sexual abuse related content (paragraph 181).

Follow-up topics specific to Norway

Overview of trends and changes in the legislative, institutional and policy framework for action against human trafficking

- Reiterating the recommendations made in its previous reports, GRETA considers that the Norwegian authorities should establish a comprehensive system for collecting data on victims of THB, broken down by sex, age, nationality, type of exploitation and country of origin/exploitation (paragraph 13);
- GRETA welcomes the designation of the Norwegian Human Rights Institution as an independent National Rapporteur on human trafficking and invites the authorities to ensure that it is provided with adequate resources and access to relevant information to enable it to fulfil its duties (paragraph 21);
- GRETA welcomes the adoption of the National Strategy against Human Trafficking and invites the Norwegian authorities to ensure that it is supported by the necessary resources to ensure its implementation (paragraph 22).

Recovery and reflection period

- GRETA once again urges the Norwegian authorities to implement its recommendations concerning the recovery and reflection period, by ensuring that it is in compliance with Article 13 of the Convention and that all presumed foreign victims of human trafficking can benefit from its protective scope and the assistance measures provided during it (paragraph 187).

Compensation

- While welcoming the new Act on Compensation for Victims of Violent Crimes, GRETA considers that the Norwegian authorities should make additional efforts to guarantee effective access to compensation for victims of THB, in particular by ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain from the exploitation of the victim, is part of the criminal investigations with a view to supporting compensation claims in court (paragraph 193);
- GRETA invites the Norwegian authorities to collect statistics on the number of victims of THB granted compensation by court decision or by the State (paragraph 194).

Legal assistance and free legal aid

- GRETA considers that the Norwegian authorities should take further steps to ensure trafficking victims' access to legal assistance and free legal aid, in particular by:
 - ensuring that free legal counselling is provided to a sufficient extent and by lawyers who have received training on THB;
 - putting in place a system to certify lawyers who are qualified to provide legal aid to victims of trafficking and ensuring that trafficking victims are systematically appointed a specialised lawyer;
 - encouraging the Bar Associations to offer training and specialisation of lawyers to provide legal aid to trafficking victims (paragraph 198).

Non-punishment provision

- GRETA urges the Norwegian authorities to take measures to ensure compliance with the non-punishment provision, including by:
 - ensuring that victims of THB are promptly identified as such, in any event before being convicted of offences they were compelled to commit;
 - encouraging prosecutors to be proactive in establishing whether an accused person is a potential victim of trafficking, and to consider that, having been trafficked, the culpability of the victim may be diminished, or even removed entirely;
 - ensuring that all negative consequences faced by victims of THB, such as detention, deportation, entry bans or delays in seeking legal residence in Norway, are lifted, including in cases where their victimhood has only been recognised after they were deported;
 - adopting a specific legal provision on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they were compelled to do so (paragraph 205).

Appendix 3

List of public bodies, intergovernmental organisations, non-governmental organisations and other civil society actors with which GRETA held consultations

Public bodies

- Ministry of Justice and Public Security
 - Police Department
 - Co-ordination Unit for Victims of Trafficking (KOM)
 - National Police Directorate
 - National Criminal Investigation Service (KRIPOS)
 - Oslo Police Department
 - National Police Immigration Service (PU)
 - Department of Crime Prevention
 - Migration Department
 - Directorate of Immigration (UDI), including National Arrival Centre and the Return Unit
 - Legislation Department
 - Civil Affairs Department
- Ministry of Labour and Social Affairs
 - National Labour Inspection Authority
 - Labour and Welfare Administration (NAV)/Directorate of Labour and Welfare
 - Directorate of Integration and Diversity
- Ministry of Health and Care Services
 - Directorate of Health
 - Norwegian Centre on Violence and Traumatic Stress Studies
 - Regional Resource Centre for Violence, Traumatic Stress and Suicide Prevention (RVTS Øst)
- Ministry of Children and Families
 - Directorate for Children, Youth and Family Affairs (Bufdir)
 - National Guidance Unit for Cases of Trafficking in Children
 - Office for Children, Youth and Family Affairs (Bufetat)
- Ministry of Foreign Affairs
- Service Centre for Foreign Workers in Oslo
- Human Trafficking Support Oslo
- Norwegian National Human Rights Institution (NIM)

Bergen

- Bergen Municipality
- Vest Police District
- Inter-agency centre against work-related crimes (A-Krim)
- Directorate for Immigration (UDI), West Norway Regional Office

Trondheim

- Trondheim Municipality
- Trøndelag Police District
- Directorate for Immigration (UDI), Mid Norway Regional Office

Intergovernmental organisations

- International Organization for Migration (IOM)

NGOs and other civil society organisations

- Caritas
- Church City Mission Oslo
- Fair Play Bygg
- Light-up
- Marita Foundation
- Migration Centre Oslo
- Nadheim Trondheim
- Pro Sentret
- ROSA
- Salvation Army
- Trade Union Federation (LO)

Government's comments

The following comments do not form part of GRETA's analysis concerning the situation in Norway

GRETA engaged in a dialogue with the Norwegian authorities on a first draft of the report. A number of the authorities' comments were taken on board and integrated into the report's final version.

The Convention requires that "the report and conclusions of GRETA shall be made public as from their adoption, together with eventual comments by the Party concerned." GRETA transmitted its final report to the Norwegian authorities on 1 April 2026 and invited them to submit any final comments. The authorities replied that they had no further comments to submit.