

2025 Trafficking in Persons Report: Estonia

ESTONIA (Tier 1)

The Government of Estonia fully meets the minimum standards for the elimination of trafficking. The government continued to demonstrate serious and sustained efforts during the reporting period; therefore, Estonia remained on Tier 1. These efforts included identifying more trafficking victims, referring or providing robust direct services to all identified potential and confirmed trafficking victims, and issuing residence permits to trafficking victims for the first time. The government provided robust training to front-line officials on investigation techniques and victim identification and protection. Under its leadership of the Council of Baltic Sea States (CBSS), the Estonian government coordinated with several regional counterparts on anti-trafficking trainings and programs, including a workshop for anti-trafficking practitioners from Baltic, Eastern European, and Central Asian countries and international organizations to share experiences and lessons learned. Although the government meets the minimum standards, it did not prosecute or convict any traffickers, and it investigated fewer trafficking cases. The government did not provide adequate victim-witness assistance for victims participating in criminal justice proceedings, such as not allowing reflection and recovery periods, hindering some investigations and prosecutions, and potentially discouraging victim participation in these proceedings. Gaps in identification remained, particularly among foreign labor trafficking victims and children.

PRIORITIZED RECOMMENDATIONS:

- Vigorously investigate and prosecute trafficking crimes and seek adequate penalties for convicted traffickers, which should involve significant prison terms.
- Increase funding for anti-trafficking activities and victim support services.
- Proactively identify trafficking victims, particularly labor trafficking victims, by developing clear identification guidance and training relevant workers to recognize indicators.
- Finalize and adopt the NRM to standardize victim identification, referral, and assistance and train law enforcement, front-line personnel, and others interacting with potential victims on implementation.
- Increase victim-witness assistance for victims participating in criminal justice proceedings, including by providing reflection and recovery periods.
- Significantly increase cooperation with civil society, including with regards to the provision of victim support services.
- Ensure authorities inform foreign victims of the possibility of temporary residence permits and reflection and recovery periods, including the assistance associated with both.
- Expand efforts to conduct more international investigations, particularly on sophisticated labor trafficking schemes that occur across multiple countries and jurisdictions.
- Enhance training for labor inspectors and other relevant authorities to increase detection of labor trafficking cases and identification of labor trafficking victims.
- Expand specialized anti-trafficking training for police and prosecutors on indicators of trafficking, victim-centered and trauma-informed approaches, and investigating and prosecuting trafficking cases.
- Establish a specialized unit of the police to prioritize trafficking cases and train them on building cases, such as collecting evidence, and allocate funding for investigations.

PROSECUTION

The government decreased anti-trafficking law enforcement efforts.

Sections 133, 133¹, and 175 of the penal code criminalized sex trafficking and labor trafficking. Section 133 (trafficking in human beings) criminalized placing a person in a situation of exploitation through force, fraud, or coercion, and prescribed penalties of between one and seven years' imprisonment for crimes involving an adult victim, and three to 15 years' imprisonment for those involving a child victim. Section 133¹ (support to human trafficking) separately criminalized the transportation, delivery, escorting, acceptance, concealment, or accommodation of an individual into a situation of exploitation through force, fraud, or coercion, and prescribed penalties of up to five years' imprisonment for crimes involving an adult victim, and between two and 10 years' imprisonment for those involving a child victim. Section 175 (human trafficking in order to take advantage of minors) criminalized inducing a child to engage in a crime, begging, "prostitution," or the production of pornography without requiring a demonstration of force, fraud, or coercion and prescribed penalties of two to 10 years' imprisonment. Authorities most often used Section 175 to prosecute child pornography cases involving no element of commercial sex. The penalties under Sections 133, 133¹, and 175 were sufficiently stringent and, with respect to sex trafficking, commensurate with the penalties prescribed for other grave crimes, such as rape.

In 2024, police investigated three labor trafficking cases, a significant decrease from 13 investigations in 2023 and 11 in 2022. Authorities did not prosecute any suspected traffickers, a decrease from three prosecutions in 2023 and one in 2022. Courts did not convict any traffickers, marking a multi-year decline from one conviction in 2023 and four in 2022. The government did not report any investigations, prosecutions, or convictions of government officials complicit in trafficking crimes. The Police and Border Guard Board (PBGB) continued cooperation with Romanian, Moldovan, and Ukrainian authorities under a project financed by the EU Internal Security Fund (ISF). The Ministry of Justice continued another ISF-funded project to support cooperation with authorities from Central Asian countries on investigations related to foreign workers. The Labor Inspectorate engaged in joint inspections under the auspices of the European Labor Authority, conducting joint workplace inspections in Finland with Finnish authorities and Estonia with Finnish authorities. While the inspections revealed violations of labor law, the government did not report identifying any trafficking victims as a result of these efforts.

Overextension of personnel remained a chief constraint – most were responsible for other issues in addition to trafficking – reducing efficiency and limiting specialized knowledge of trafficking. The PBGB investigated trafficking crimes in Estonia and provided specialized training for officers; however, it did not have a unit or office dedicated solely to investigating trafficking crimes, reducing the efficiency of investigations. Observers noted a dedicated police unit would prioritize trafficking cases, yield a more proactive approach to investigations, and improve the quality of cases presented to prosecutors. The Organized Crime Group of the Central Criminal Police investigated international trafficking cases and those involving high-level organized crime at the national level. Criminal bureaus of the four police prefectures staffed officers responsible for trafficking investigations, among other crimes. The Criminal Bureau of the Northern Prefecture maintained a six-officer unit for investigating trafficking and other organized crime cases. Similar to the police prefectures, there were four district prosecutor's offices with one prosecutor working on trafficking cases, among other crimes, per district and the potential to increase to two prosecutors per district. Furthermore, the Prosecutor General's Office appointed a prosecutor to coordinate anti-trafficking activities and cooperation among prosecutors nationwide. Prosecutors supervised police investigations. Observers expressed concerns that some trafficking cases went undetected by police and reported investigations were generally reactive with many cases generated from the trafficking hotline. Most sexual exploitation cases were related to crimes of "pimping," which Estonian law classified as a trafficking crime. With the rise in online exploitation, the police regularly monitored the internet and social media for criminal activities, including trafficking, and worked with service providers to collect information on and remove illegal advertisements. The PBGB and the Central Criminal Police monitored digital content for criminal activities, including trafficking, involving children. While the PBGB reported there were adequate resources available for addressing trafficking, experts noted a need to provide more resources to authorities and train them on trafficking trends, anti-trafficking laws, and investigating and prosecuting cases. The government regularly provided robust anti-trafficking trainings for police, prosecutors, labor

inspectors, and victim support specialists, including on victim identification, interviewing techniques, investigative methods, and cross-sectoral cooperation.

PROTECTION

The government increased victim protection efforts.

In 2024, authorities identified 85 potential trafficking victims (two sex trafficking and 83 labor trafficking), an increase compared with 35 potential victims identified in 2023. Of the 85 potential victims, authorities formally identified seven trafficking victims (five sex trafficking and two labor trafficking), an increase from two formally identified victims in 2023 and four in 2022. Of the 85 potential trafficking victims, 69 were men and 16 were women. Potential victims were from Ukraine, Brazil, Columbia, and the Russian Federation in addition to other countries. Six of the seven formally identified trafficking victims were foreign nationals. Authorities did not identify any child trafficking victims for the second consecutive year. As in previous years, experts expressed concern statistics did not provide a comprehensive picture of the trafficking situation in Estonia because of gaps in identification, particularly the identification of foreign labor trafficking victims. Multiple actors, such as law enforcement, immigration, and social services personnel, used written guidelines for identifying potential victims and a questionnaire and checklist to identify indicators among asylum-seekers. In 2023, the government began developing an NRM for victim identification and referral based on existing written guidelines; however, it was not finalized for the second consecutive year. The government reported it began integrating the draft NRM into trainings for front-line officials while the final version remained pending. The government utilized a data-sharing system to expedite the exchange of information between authorities and SIB – the agency that funded, organized, and provided victim support services – ensuring potential victims received immediate assistance.

In 2024, the government continued to implement the Victim Support Act (VSA) on the provision of assistance to victims. After preliminary identification, authorities referred potential victims to SIB; in turn, SIB notified law enforcement to initiate an investigation. During the initial investigation, potential victims received support services from SIB for up to 14 days; after 14 days, local government funding covered services until police and/or the prosecutor's office formally identified potential victims as trafficking victims. Formally identified victims could continue to receive support services; however, support services ceased for those not formally identified. Under the VSA, victims received comprehensive government-funded, trafficking-specific services, such as counseling, accommodation, and psychological, medical, and legal assistance. In 2024, police referred all 85 potential victims for screening and support services. SIB selected service providers for assistance and shelter through the public procurement system. SIB continued to contract five hotels to provide safe accommodation with food and financial assistance to adult victims, and, if necessary, children. According to SIB, utilizing the public procurement system was more cost effective than the previous funding mechanism through which the government funded an NGO to provide support services. Nonetheless, experts raised concerns the public procurement process reduced the role of NGOs that had expertise in the provision of assistance to victims and, in turn, reduced partnership with NGOs providing support services. Civil society representatives also raised concerns about limited cooperation between the government and NGOs. In 2024, the government allocated €100,000 (\$96,100) for victim support services, the same amount as in 2023 after a multi-year decrease from €120,000 (\$115,320) in 2022 and €350,656 (\$336,692) in 2021.

Under the VSA, local child protection services were responsible for determining support services, including safe accommodations, such as foster homes, for child trafficking victims and unaccompanied children. The law required local child protection services to refer child victims to four dedicated centers for child victims of abuse, including trafficking, offering specialized services for up to 60 days. Local government funding covered services beyond 60 days. SIB managed the centers and based them on the Barnahus method – a child-friendly, multidisciplinary approach offering child victims a coordinated and effective response during investigations and criminal proceedings. Authorities cooperated with Barnahus centers to conduct interviews, perform medical

examinations, and provide need-based services and assistance. While the government maintained written guidelines with specific information on identifying child trafficking victims, authorities only identified three child victims in the past five years.

The Aliens Act enabled foreign trafficking victims to receive temporary residence permits, accommodation, and education for up to 12 months. In 2024, the government issued residence permits for the first time to two trafficking victims. Experts previously raised concerns at the low number of residence permits granted to victims, as well as the low number of reflection and recovery periods granted. For the past six years, the government did not grant reflection and recovery periods to any foreign trafficking victims. While the Aliens Act allowed foreign victims a reflection and recovery period, experts contended it did not align with international laws and did not refer to a period of reflection and recovery necessary for victims to determine if they would participate in criminal proceedings. Furthermore, experts claimed authorities did not adequately inform victims of the possibility of a reflection and recovery period and the associated assistance – victims granted a reflection and recovery period could receive assistance until the end of their legal stay in Estonia or their early departure. Conversely, authorities reported victims received the necessary information on a reflection and recovery period, temporary residence permits, and international protection but, ultimately, chose to leave the country. International organizations and civil society continued to criticize law enforcement and immigration officials’ implementation of 2022 amendments to the State Borders Act, which authorized “pushbacks” of migrants into Russia; such “pushbacks” potentially increased vulnerability to trafficking, exacerbated distrust of foreign officials, and deterred potential victims from reporting trafficking crimes or seeking assistance. In general, the Estonian judicial system implemented a victim-centered approach and guaranteed a support contact throughout criminal proceedings. SIB provided victims with legal aid during criminal proceedings and utilized lawyers with experience protecting trafficking victims. The Ministry of Justice (MOJ) also provided legal aid, particularly for victims with low incomes or specialized needs, such as individuals with psychological or physical disabilities. The law allowed victims to obtain restitution from traffickers in criminal cases and file civil suits against traffickers for compensation; however, courts have not awarded restitution to trafficking victims since 2022.

PREVENTION

The government maintained prevention efforts.

As the national trafficking coordinator, MOJ monitored implementation of anti-trafficking policies and plans and led domestic and international cooperation. The government’s anti-trafficking roundtable facilitated interagency coordination, comprised multiple agencies working on anti-trafficking activities, and published an annual report of those activities. The MOJ reported a budget of €5,000 (\$5,202) for anti-trafficking activities in 2024. In collaboration with the European Migration Network, the government published two reports on migration and asylum that included information on trafficking. The government maintained an anti-trafficking strategic development plan and a violence prevention action plan based on the Violence Prevention Agreement, which included several anti-trafficking activities, such as training and awareness programs. SIB continued an anti-trafficking awareness campaign in high schools nationwide to train teachers on trafficking indicators. The PBGB maintained an email for all government agencies, employees, and the general public to report suspected trafficking crimes. In addition, the government managed an anti-trafficking hotline, which received 301 calls from potential victims, of which authorities referred five sex trafficking cases to SIB for further services and 42 labor trafficking cases to SIB and police; the hotline provided counseling and referrals in Estonian, Russian, and English. Government representatives continued to participate in the CBSS anti-trafficking task force, working to strengthen and improve anti-trafficking policies in the region, consolidate expertise from the national level with the international level, and exchange information on efforts and best practices. Under Estonia’s leadership of the CBSS task force, the government organized training for diplomatic personnel of CBSS members on victim assistance and protection. Additionally, the government hosted a workshop for anti-trafficking practitioners from Baltic, Eastern European, Central Asian countries and international organizations to share experiences and lessons learned.

Estonian law prohibited the misuse of employment regulations and required companies to pay migrant workers the average monthly salary required by the law. In addition, the law prohibited recruitment agencies from charging fees to job seekers for placement services and required the Labor Inspectorate (LI), which had the authority to investigate labor trafficking, to monitor agencies for compliance. In 2024, labor inspectors screened for labor trafficking and actively forwarded tips to the PBGB regarding employers whose activities might contain indicators of human trafficking or labor exploitation; however, labor inspectors did not detect any cases resulting in the formal identification of a trafficking victim in the course of their inspections during the reporting period. Experts suggested labor inspectors and other relevant authorities could benefit from specialized training to increase detection of labor trafficking cases and identification of victims. The Western Police Prefecture, LI, and Tax and Customs Board conducted biweekly meetings to examine emerging issues, exchange information, and discuss trafficking risks. The LI provided migrant or local workers with free legal services regarding work-related problems, such as unpaid salary, and maintained an informational phone line and website on workers' rights. In 2024, the PBGB conducted informational seminars for employers on foreign nationals' rights to work in Estonia. The government required employers to register employees in the Tax and Customs Board register, which gathered information about employment, upon commencement of work and within 10 calendar days of termination. PBGB officials from child and sex crimes units made efforts to reduce the demand for participation in extraterritorial sexual exploitation and abuse by its citizens by exchanging information and investigating cross-border violence, including trafficking, with representatives from EUROPOL and INTERPOL. The government did not report efforts to reduce the demand for commercial sex acts.

TRAFFICKING PROFILE:

Trafficking affects all communities. This section summarizes government and civil society reporting on the nature and scope of trafficking over the past five years. Human traffickers exploit domestic and foreign victims in Estonia, and, to a lesser extent, traffickers exploit victims from Estonia abroad. Trafficking victims typically originate from Central and Southeast Asia, Eastern Europe, and South America. Vulnerable groups include individuals with limited education and migrants. In general, women and children are mainly at risk of sex trafficking and men of labor trafficking. Traffickers use the internet, social media, and instant messaging applications to recruit and exploit sex trafficking victims in Estonia. The majority of identified victims are female sex trafficking victims; however, the majority of trafficking investigations are labor trafficking cases. Migrant workers from Ukraine and Central Asia are vulnerable to labor trafficking in Estonia, particularly in the construction, forestry, food, and services sectors. Citizens of Ukraine, Belarus, and Moldova are at risk of labor trafficking in the cleaning sector. Citizens of Pakistan, India, and Bangladesh arrive in Estonia to work in the food sector where they are vulnerable to trafficking by other citizens of those countries who reside in Estonia. The government reports an increase in the number of individuals from Central Asia who come to Estonia for employment and are forced to pay high recruitment fees to recruiters who are typically from the same country as the victims and have ties to organized crime. Officials noted foreign "posted workers," hired by temporary agencies and placed in Estonian companies, and their family members are especially vulnerable to trafficking. As a result of periodic Russian-facilitated illegal migration flows in the region, migrants from Syria, Somalia, and Egypt attempting to transit Estonia are vulnerable to trafficking. Thousands of foreign nationals and Ukrainian refugees, predominantly women and children, who are fleeing war and seeking sanctuary, are highly vulnerable to trafficking.