



Estonia

Report on Cooperation between Stakeholders at the National Level in Estonia to Address Trafficking for Labour Exploitation

PS. | Peace and Security
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Introduction

This study was conducted by Peace and Security Consulting (PS. Consulting) for the Task Force against Trafficking in Human Beings (TF-THB) of the Council of the Baltic Sea States (CBSS). CBSS is a political forum for regional inter-governmental cooperation in the Baltic Sea Region. The Members of the Council are eleven states of the Baltic Sea Region: Denmark, Estonia, Finland, Germany, Iceland, Latvia, Lithuania, Norway, Poland, Russia, Sweden, as well as the European Commission. The Task Force is an expert group composed of national experts on human trafficking from ministries in all of the eleven member states of CBSS. This group falls under the CBSS long term priority on Civil Security and the Human Dimension, and works to counteract trafficking in human beings in the Baltic Sea Region and its vicinity, through preventative and protective activities. The Task Force provides an intergovernmental platform for regional cooperation and a forum for the transfer of knowledge and best practice. As such, it aims to strengthen, build upon and improve current policies and operational work in the region through joint collaborative projects. These projects include research and analysis, data collection, trainings and facilitation of cooperation among stakeholders at the national level in CBSS Member States. The Task Force is supported by a team of two staff members at the CBSS Secretariat in Stockholm, Sweden.

This study was conducted in the eleven member states of the CBSS, as the second phase of the DEFLECT project, and in preparation for the implementation of the ADSTRINGO project during 2012-2014. ADSTRINGO is a partnership project between CBSS TF-THB, the European Institute for Crime Prevention and Control (HEUNI), the Ministry of Interior in Lithuania, and the University of Tartu. The main objective of this project is to establish a dialogue among key actors at the national level, in order to increase cooperation to address trafficking for labour exploitation¹.

The aim of the study is to obtain an overview of the different actors who are currently involved in the work of combating and preventing trafficking for labour exploitation. Actors have occasionally also been included who have a significant potential to be involved in this work. In addition, the study has analysed existing resources and structures, primarily when it comes to cooperation at the national level. This work was a necessary starting point in identifying existing resources as well as challenges encountered by different actors at the national level. The results have been compiled into eleven individual reports which will serve as a starting point and as a basis for dialogue at the national level in each member state. The reports have been designed to present an overview of relevant actors and mandates; governmental as well as non-governmental. They further analyse the current forms of cooperation, in terms of mechanisms in place as well as relevant policies and legislation.

The findings are based mainly on the expertise and experience of national actors currently working on the issue of trafficking for labour exploitation and forced labour. As such, the reports are meant to capture resources as well as challenges as they are perceived and identified by the relevant national actors, according to the individual context in that specific country.

Methodology

The purpose of this study was to map out existing actors, resources and cooperation mechanisms at the national level addressing trafficking for labour exploitation. For this purpose, national actors were identified and asked to provide their expertise as well as perceptions of existing resources. In each member state, the national delegate of the TF-THB assisted in identifying relevant actors with government

¹Although the terms *labour exploitation* and *forced labour* refer to different crimes, these crimes are closely related, especially with regards to trafficking in persons. In this study, the terms *trafficking for labour* and *trafficking for labour exploitation* have been used intermittently, and should be assigned the same meaning. For the purpose of this study, both terms include trafficking for forced labour as well as labour exploitation.

departments and ministries, as well as civil society actors such as Non-Governmental Organisations (NGOs) and trade unions. When needed, this information was complemented with input from other relevant national experts and additional contacts using a snowball sampling approach².

Representatives from these different organisations and departments were asked to participate in a survey and to fill in an electronic questionnaire with mainly open, descriptive questions. Respondents were chosen according to their level of experience and expertise and were selected in order to encompass as many relevant stakeholders as possible. The questionnaire was generally distributed to approximately ten to twelve respondents from different organisations and departments in each member state, although the number of respondents varied between states. The questionnaire (attached in appendix 3) included questions on the mandate and role of the specific actor, existing cooperation with other actors, existing legislation and policy, existing structures and cooperation mechanisms, as well as limitations and challenges encountered in the current work on trafficking for labour exploitation.

The respondents who made the assessment that they did not have the experience, mandate, or knowledge needed to fill in the questionnaire were asked to fill in a few short, alternative questions, focusing more specifically on their work. These questions concerned their role with regards to trafficking in persons for labour, existing cooperation partners and modes, the potential role which they felt they could take on within this area, and what would be needed for them to extend their role or mandate. When complimentary information or clarifications were needed, in addition to the questionnaires, this was generally given via e-mail correspondence. The findings from the questionnaires were also complemented with other resources such as National Action Plans, policy and legislation documents, national reports and evaluations, as well as external reports, which were found relevant in the different member states. Nevertheless, the main purpose of the study was to map out the knowledge and perceptions of relevant actors working with trafficking or labour exploitation issues, which is why the survey and its related correspondence constitute the core of the national reports.

Findings

Out of twelve Estonian respondents asked to participate in the survey, six submitted the questionnaire. These respondents represented: The Police and Border Guard Board, Office of the Prosecutor General, the Labour Inspectorate, the Gender Equality Department of the Ministry of Social Affairs (SM), the Ministry of Justice (MoJ), and the NGO Living for Tomorrow (LFT).

Estonia is reported to still lack knowledge, capacity, and resources to address trafficking for labour exploitation, especially seeing as trafficking for sexual exploitation has received more attention so far. Being a source country for trafficking in persons, there have been some valuable preventive efforts and cooperation with labour and employers' organisations has been initiated. However, respondents stated that resources and training are still needed, as well as an enforcement of existing cooperation mechanisms.

The findings of this report are divided into two parts. The first part concerns relevant actors working on trafficking in persons, as well as their roles and mandates. Seeing as this study has a particular focus on trafficking for forced labour and labour exploitation, some actors have been included in the reports who are relevant only for this particular type of trafficking, while other actors work on trafficking in persons in general and may even avoid to make a distinction between the different purposes and types of this crime. The second part of the findings concerns existing legislation and policy, as well as their limitations. Since the aim of this study is to map out national cooperation resources and mechanisms, the focus of the

²The snowball sampling approach is based on the idea that one respondent will lead you on to another. In this particular case, some respondents were asked for advice on additional relevant contacts.

report is on legislation and policy which governs, describes or enhances such cooperation. Hence, the purpose is not to evaluate the legislation on the criminal act as such, although such issues sometimes surfaced in the survey. The second part of the findings section also concerns existing cooperation mechanisms at the national level, such as; institutions, working groups, and coordinators, as well as challenges and limitations identified by the respondents.

Actors and mandates

Apart from the six actors who submitted the questionnaire for the survey, at least fifteen other authorities and organisations were mentioned as relevant stakeholders or as existing cooperation partners: the Border Guard, the Military Police, the Tax and Customs Board, the Competition Authority (ECA), the Environmental Inspectorate, the Defence Forces, foreign embassies in Estonia, the Working Life Development Department of the Ministry of Social Affairs (SM), the Ministry of Economic Affairs and Communications, the Law Enforcement and Criminal Policy Department of the Ministry of Interior, the Unemployment Insurance Fund, the Estonian Chamber of Commerce and Industry, the Estonian Employers' Confederation, the Estonian Trade Union Confederation (ETUC), and the European Job Mobility Centre (EURES).

The section below describes the roles and cooperation efforts of the participating actors, as well as the roles of a few other actors identified as relevant.

Governmental

Police and Border Guard Board: In the survey for this study, the Citizenship and Migration Division (CMD) participated, as part of the Police and Border Guard Board. CMD provides information to the Central Criminal Police Department on the cases of trafficking for forced labour and labour exploitation which they encounter. The Central Criminal Police Department is also their main cooperation partner³.

According to Markina and Kask⁴, CMD also drafts regulations and law proposals concerning migration control. In addition, it is the mandate of the division to control the legal status of immigrants and migrant workers. This work includes inspections of workplaces where migrant workers are thought to be employed. In preparing for these inspections, CMD exchanges information with, for example, the Tax and Customs Board and the Border Guard.

Office of the Prosecutor General: The mandate of the Prosecutor General is to lead investigations concerning cross-border and international crimes, including trafficking in persons. According to the Office of the Prosecutor General's Act, the office participates in planning surveillance efforts to prevent and detect crime, leads preliminary investigations, and represents public prosecution in court⁵.

Preliminary investigations and prosecutions are carried out in cooperation with the Police and Border Guard Board, the Military Police, the Tax and Customs Board, the Competition Authority, the Environmental Inspectorate, and the General Staff of the Defence Forces⁶.

Labour Inspectorate: The Labour Inspectorate investigates and enforces the compliance of workplaces with occupational health and safety regulations through regular inspections, and conducts overall analyses of compliance in Estonia in general. The Police and the Border Guard are the main cooperation partners of the Labour Inspectorate in the work on trafficking in persons. The labour inspectors report suspected

³ Questionnaire 2012: Citizenship and Migration Division, Board of the Police and Border Guard

⁴ Markina, A. and Kask, M (2011) "Trafficking for Forced Labour and Labour Exploitation in Estonia" in Jokinen, A.; Ollus, N; Aromaa, K. (eds.) (2011) *Trafficking for Forced Labour and Labour Exploitation in Finland, Poland and Estonia*, HEUNI, Helsinki.

⁵ Questionnaire 2012: Office of the Prosecutor General

⁶ Questionnaire 2012: Office of the Prosecutor General

cases of trafficking in persons encountered to the police or border guard, while also assisting the police as labour relations experts during criminal proceedings⁷.

Ministry of Social Affairs: In the survey for this study, the Ministry of Social Affairs was represented by the Gender Equality Department. This department works mainly on trafficking for sexual exploitation, with women's rights as a starting point. Nevertheless, the ministry also works with labour market issues. For example, it is the mandate of SM to register labour market service providers and temporary employment agencies, and to enforce the regulations governing this area (for example the prohibition to charge job seekers with any fees)⁸.

The Gender Equality Department stated that they mainly cooperate with MoJ and Living for Tomorrow. The latter have been contracted by SM since 2006 to provide an anti-trafficking hotline. Cooperation with ministries as well as NGOs takes place through a national working group on anti-trafficking which was established in 2006, and which will be described in more detail further on (under Cooperation: Mechanisms). Cooperation efforts are mainly concerned with implementing the Development Plan for Reducing Violence for the period of 2010-2014. Trafficking in persons is one of the four areas included in the development plan⁹.

Ministry of Justice: The Criminal Policy Department and its Analysis Division holds the post of the National Coordinator on Trafficking in Persons in Estonia, since 2006. The Coordinator chairs and sets the agenda for the meetings of the Coordination Network, which monitors the implementation of the National Plan of Action (NPA). In addition, he or she is responsible for the annual report on the implementation of the NPA, based on the input of different actors. The post as national coordinator is not a full-time position¹⁰.

A set of roundtable discussions has been planned for 2012, which MoJ will be organising in cooperation with SM. To these discussions, the labour organisations will be invited to discuss the latest changes to legislation, and to be informed on the issue of trafficking for labour exploitation¹¹.

Non-Governmental

Living for Tomorrow: LFT was founded in 1999, and has since worked with Sexual Health Education and the prevention of Human Trafficking through gender-sensitive and active learning. The anti-trafficking activities have been implemented throughout Estonia since 2000, including: information campaigns, training for youth, adults and professionals, a victim assistance hotline, prevention efforts amongst vulnerable populations, research activities and the implementation of pilot project¹².

LFT cooperates with SM, EURES, the Labour Inspectorate, the Police, and foreign embassies in Estonia. Cooperation mainly consists of sharing information on a case-to-case basis with SM and the Police, assisting victims in their contacts with authorities such as the Labour Inspectorate and the police, and of the implementation of preventive measures with EURES and foreign embassies¹³.

Estonian Trade Union Confederation: ETUC were invited to participate in the survey for this study, but chose to answer an alternative set of questions, as they do not have a mandate, nor experience, when it comes to trafficking for labour exploitation. It was stated that neither ETUC nor its affiliated unions

⁷ Questionnaire 2012: Labour Inspectorate

⁸ Questionnaire 2012: Ministry of Social Affairs

⁹ Ibid

¹⁰ Questionnaire 2012: Ministry of Justice

¹¹ Ibid.

¹² Questionnaire 2012: Living for Tomorrow

¹³ Ibid.

work on trafficking for labour or closely related issues, such as migrant workers or labour exploitation. The unions in Estonia usually operate on a company level, whereas the level of individual memberships is low. Migrant workers are not normally members of a union. The main tasks of the confederation are to improve collective agreements for workers, and to monitor the implementation of legislation. As a consequence, ETUC has been involved in the task of preparing amendments to the Aliens Act, through which the minimum wages for migrant workers were established. Nevertheless, ETUC stated that they do not particularly see themselves as capable of doing more within this area. This is due to a lack of funding, as well as a lack of training and capacity¹⁴.

European Job Mobility Centre: EURES similarly declined to participate in the survey for this study, as they did not see themselves as competent to answer the questionnaire. Nevertheless, they answered a set of alternative questions. The purpose of EURES is to provide information, advice and recruitment services for workers as well as employers. Their main goal is to maximise safety for migrant workers within the EU. As such, EURES is a network of advisers specialised on the legal and administrative aspects of employment, usually working within partnering institutions. Informing on the risks of labour migration is included in this work, as is informing on the conditions and rights of non-EU citizens working within the EU¹⁵.

EURES cooperates with Living for Tomorrow in providing information events on safe work abroad, to which representatives from the police, social insurance fund, and the tax and customs board are also invited. Information events have also been organised on the ferry from Tallinn to Helsinki, concerning social rights, taxation and contracts¹⁶.

EURES were also described as one of the lead agencies within this area, as they have been instrumental in analysing trends and vulnerable groups, referring victims, and disseminating information material. The representative of the organisation stated that they could be doing more within this area, with more training, cooperation with other countries to share lessons learnt and experience, and generally an increased exchange of information¹⁷.

Cooperation

The current distribution of tasks in Estonia is to some extent governed by the NPA (the Development plan for Reducing Violence for 2010-2014).

Criminal investigations on trafficking in persons are conducted by the police and border control. These are part of the same Police and Border Guard Board, nevertheless, the Citizenship and Migration Division has specialised on this particular issue. This unit further proactively identifies victims through workplace inspections of migrant workers. The participation of the Labour Inspectorate as well as labour/trade unions is very limited in proactively identifying and referring victims.

The Ministry of Social Affairs has commissioned Living for Tomorrow to conduct preventive work on Human Trafficking, as well as to provide a hotline for potential victims. LFT also provides legal aid and social support to victims. All cases of trafficking in persons which LFT encounters are reported to SM. Apart from this collaboration between LFT and SM, cooperation between civil society actors and government authorities mainly takes place through the coordination network organised by MoJ. In this forum, NGOs and other actors participate in discussions on the implementation of the NAP.

¹⁴ E-mail Correspondence 2012: Estonian Trade Union Confederation

¹⁵ E-mail correspondence 2012: European Job Mobility Centre

¹⁶ Ibid.

¹⁷ Ibid.

Policy and legislation

Trafficking in persons has been included in the Estonian penal code since 2012. Certain provisions of the **Aliens Act and Penal Code** also address the working conditions of migrant workers and related issues. According to one of the respondents, this legislation is up to date with the standards of the European Union and provides comprehensive protection for victims of trafficking.

According to the respondents, there is a lack of both cooperation mechanisms and legislation which govern cooperation in Estonia. Cooperation usually takes place on a case-to-case basis. However, it was mentioned that there are plans to develop procedural rules during 2012.

The cooperation between the police and the prosecutor general is regulated through the **Criminal Procedure Code**, which for example establishes the leading role of the prosecutor in a preliminary investigation. In addition, the Office of the General Prosecutor's Act states that the mandate of this authority is to participate in the prevention and detection of crimes; to lead preliminary investigations, and to represent public prosecution in court.

Estonia has previously published a Development Plan for Combating Trafficking in Human Beings for 2006-2009. This specific area is currently incorporated into the **Development Plan for Reducing Violence 2010-2014**, which brings up findings and planned activities related to trafficking in persons. The issue of forced labour is specifically mentioned in the plan, referring to activities such as a dialogue between for example: the Labour Inspectorate, the Chamber of Commerce and Industry, the Employers' Confederation, and the Unemployment Insurance fund¹⁸. No other policy documents were mentioned by the respondents.

When asked about limitations to the current legislation on trafficking in persons, the respondents stated that the legislation does not provide a clear definition of trafficking for labour exploitation, something which constitutes an obstacle to the identification of victims. Victims of trafficking for labour exploitation are often forced to turn to an administrative court, rather than a criminal court, which leads to large expenses for the victim. Another respondent pointed out that the provisions in the penal code on trafficking in person have not been in place long enough to produce crime statistics, or to allow for an evaluation of whether the legislation serves its purpose. No issues were raised concerning the existing policy documents.

Mechanisms

Specialised Units: The Estonian Police have assigned the Unit for Serious Crimes and Crimes against Persons with the Northern Police Prefecture and with the Central Criminal Police the task of investigating cases of trafficking in persons in general. No unit has been given the mandate to specifically investigate trafficking for labour exploitation. Within the Office of the Prosecutor General, there seems to be staff which have specialised on cases of trafficking in persons to some extent, but not a unit working only on this matter.

Lead Agency: For the role as lead agency in Estonia, a few suggestions were raised by the respondents. MoJ was suggested, seeing as the ministry is responsible for the implementation of the current NPA. The Labour Inspectorate, Police and Border Guard were also suggested, as was EURES and LFT, seeing as they have led the preventive work in Estonia, as well as the provision of victim assistance.

¹⁸ Ministry of Interior (2010) Development Plan for Reducing Violence for Years 2010-2014, Tallinn

National Plan of Action: Estonia has previously published a Development Plan for Combating Trafficking in Human Beings for 2006-2009. All respondents mentioned the current Development Plan for Reducing Violence 2010-2014, when asked about a national plan of action. This plan is not an NPA focused solely on trafficking, but does bring up issues and activities related to this specific crime. In fact, preventing and combating trafficking in persons is one of the four objectives of the plan. Preventive efforts such as awareness raising activities are included, mostly for schools. The issue of forced labour is specifically included in the plan, where a scoping study has been planned as well as carried out, and information work has been conducted. A dialogue between actors such as the Labour Inspectorate, the Chamber of Commerce and Industry, the Employers' Confederation, and the Unemployment Insurance fund has been initiated. During 2012, these actors are to be included in discussions of the Coordination Network. Most of the other activities which have been planned concern victim assistance, mainly for victims of trafficking for sexual exploitation, as well as measures to improve investigations¹⁹.

Working Groups: There is a national working group referred to as the Coordination Network, consisting of ministries as well as NGOs, it has met for roundtable discussions twice a year since 2006. This group is chaired by the national coordinator within the MoJ and has the mandate to discuss and monitor the implementation of the NPA. In addition, the members may discuss operational needs as well as the revision of policy, and agree on measures to be taken. This network has stated the importance of placing trafficking for labour exploitation on the agenda. One of the activities of the current NPA, to be conducted by MoJ in cooperation with SM, is to include labour organisations and employers' organisation in roundtable discussions during the second half of 2012. These organisations are to be informed on recent changes to legislation and on trafficking for labour exploitation.

National Coordinator or Rapporteur: Although not all respondents were aware that Estonia has a National Coordinator, this function has been in place since 2006. It is an advisory post with the Criminal Policy Department Analysis Division of MoJ, although not a full-time position. The coordinator chairs and sets the agenda for the meetings of the Coordination Network described above. In addition, he or she collects input and suggestions, data and crime statistics from different stakeholders for the annual report on the implementation of the NPA, which is presented to the government. This reporting function resembles the tasks of a National Rapporteur, although the national coordinator in Estonia is also involved in implementation efforts, is not independent, and does not have the capacity which a national rapporteur normally has.

Memorandum of Understanding: In terms of MoUs or current agreements between Estonian actors, only the agreement between LFT and SM was mentioned, where LFT has been commissioned to provide certain victim assistance services and to conduct preventive work on trafficking in persons.

Challenges and Limitations

When asked about challenges and obstacles currently limiting their work on trafficking for labour exploitation, the respondents in the survey stated the lack of knowledge and capacity, as well as the lack of legislation and policy. The lack of cooperation was also mentioned by one of the respondents, while the lack of referral mechanisms was raised by two participants.

Knowledge on the topic of trafficking for labour is still very limited, as is the number of identified cases. It was stated that many actors lack capacity, mainly staff. The existing capacity and resources are used to work on trafficking for sexual exploitation rather than trafficking for other purposes, since cases of the former are more frequently identified.

¹⁹ Ministry of Interior (2010) Development Plan for Reducing Violence for Years 2010-2014, Tallinn

Trafficking for labour exploitation was described as a new phenomenon in Estonia. In fact, it was stated that there is practically no trafficking for labour exploitation in Estonia, and therefore also no cooperation. At the same time, it was mentioned that Estonia is a source country for trafficking for labour exploitation and that preventive efforts are needed to resolve this situation. It was further stated that there is a lack of understanding with the different authorities, but also a lack of human resources and funding to work on the issue. Cooperation was described as still being in a development phase, where more concrete plans are yet to follow from general discussions. In addition, a clear framework for cooperation is missing.

Trafficking in persons as a crime has only recently been included in the Estonian penal code, hence there are no crime statistics to determine the scope of the issue, and it is too early to evaluate the effects of the amendments. Nevertheless, one of the respondents stated that the legislation is insufficient in allowing actors to identify and refer cases of trafficking for labour exploitation. NGOs currently identify victims who cannot be assisted since they are not legally recognised as victims of a crime. The roles of different agencies also need to be clarified, while referral mechanism should be strengthened.

Conclusions

Estonia is mainly a source country for trafficking in persons for forced labour and labour exploitation, although it is also on the receiving end for migrant workers from other countries within the former Soviet Union. Being a source country for victims of trafficking normally means receiving a large number of repatriated victims of trafficking in persons. This is a good reason as any to implement preventive efforts as well as victim assistance programmes. It is fortunate that Estonia holds a number of actors who have realised the importance of this type of work. It is unfortunate that these actors still have a limited knowledge on the subject of trafficking for labour exploitation.

Levels of awareness concerning trafficking for labour exploitation are still low, compared to trafficking for sexual exploitation. Actors such as trade unions, employers' organisations and labour market organisations have only recently been invited to participate in discussions on the topic, and readily admit to both a lack of knowledge and experience, and a limited mandate. Organisations such as EURES certainly have both the potential and the will to do more within this area, nevertheless, training and capacity building efforts are needed to expand their mandate and to ensure efficient cooperation with other organisations. The lack of identified cases of trafficking for labour exploitation, combined with a lack of knowledge, has led to the current situation where the limited capacity and resources which exist are used to work on trafficking for sexual exploitation rather than trafficking for other purposes.

Trafficking in persons has only been included in the penal code for a short period of time, which makes it difficult to assess the impact of the legislation and to measure the scope of the crime, particularly seeing as the legislation lacks a clear definition of trafficking for labour exploitation. A lack of cases identified does not necessarily mean that cases do not exist. Sufficient legislation, as well as well-trained law enforcement and prosecutors, are instrumental in making sure that trafficking for labour exploitation is recognised as just that, and is prosecuted accordingly. Only when perpetrators are prosecuted do they contribute to crime statistics which describe the scope and nature of the crime. Research is also important in order to investigate scope, modus operandi, as well as limitations to existing resources and mechanisms. Nevertheless, such efforts similarly, to some extent, depend on knowledge and awareness of the issue and its nature.

Appendix 1: Relevant departments and organisations

Actors participating in the study:

- **Ministry of Justice** (Justiitsministeerium: national coordinator for issues related to human trafficking)
- **Ministry of Social Affairs** (Sotsiaalministeerium: gender equality department)
- **Police and Border Guard Board** (Politsei- ja Piirivalveamet: **Citizenship and Migration Division**)
- **Office of the Prosecutor General** (Prokuratuur)
- **Labour Inspectorate** (Tööinspeksioon: Labour Relations Department)
- **Living for Tomorrow** (NGO)

Actors invited not participating:

- **Police and Border Guard Board** (Politsei- ja Piirivalveamet: **Border Guard**)
- **Ministry of Social Affairs** (SM: Sotsiaalministeerium: Working Life Development Department)
- **Ministry of Interior** (Siseministeerium: Law Enforcement and Criminal Policy Department)
- **Estonian Employers' Confederation** (Eesti Tööandjate Keskliit)
- **Estonian Trade Union Confederation** (ETUC: Eesti Ametiühingute Keskliit)
- **European Job Mobility Centre** (EURES)

Other actors mentioned by respondents:

- **Estonian Chamber of Commerce and Industry** (Eesti Kaubandus-Tööstuskoda)
- **Ministry of Economic Affairs and Communications** (Majandus- ja Kommunikatsiooniministeerium)
- **Military Police** (Sõjaväepolitsei)
- **The Defence Forces** (Eesti Kaitseväge)
- **Tax and Customs Board** (Maksu- ja Tolliamet)
- **Competition Authority** (ECA: Konkurentsiamet)
- **Environmental Inspectorate** (Keskkonnainspeksioon)
- **Foreign embassies in Estonia**
- **Unemployment Insurance fund** (Eesti Töötukassa)

Appendix 2: Acronyms and Abbreviations

CBSS	Council of the Baltic Sea States
CMD	Citizenship and Migration Division
ECA	Estonian Competition Authority
ETUC	Estonian Trade Union Confederation
EURES	European Job Mobility Centre
IOM	International Organisation for Migration
HEUNI	The European Institute for Crime Prevention and Control, associated with the UN
LFT	Living for Tomorrow
MoI	Ministry of Interior
MoJ	Ministry of Justice
MoU	Memorandum of Understanding
NGO	Non-Governmental Organisation
NPA	National Plan of Action
SM	Sotsiaalministeerium
TF-THB	Task Force against Trafficking in Human Beings
TiP	Trafficking in Persons