



Swedish Agency for Work  
Environment Expertise

# Perceptions of the relationship between work-related crime and the work environment

– an interview study regarding the knowledge and  
experiences of work environment stakeholders

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experiences of work environment stakeholders

# Foreword

The Swedish Delegation Against work-related crime [*Delegationen mot arbetslivskriminalitet*] has declared work-related crime to be a serious social problem and says that there is insufficient knowledge about its extent and consequences. Organised work-related crime is also assumed to lead to a worsened work environment and increased risks for workers, including the mismanagement of safety measures, which can lead to occupational injuries and deaths. There is therefore a great need for increased knowledge about how this problem presents itself in today's Swedish society.

Based on the fourth goal of the Swedish Government's national work environment strategy for the years 2021–2025, "A Good Work Environment for the Future", namely "A labour market without crime and cheating" (Swedish Government, 2020), the Swedish Agency for Work Environment Expertise has initiated a project to collect and compile knowledge about work-related crime and its possible consequences for employees' work environment.

The project has resulted in two independent reports. The purpose of this report has been to obtain knowledge and experiences about work-related crime and its impact on the work environment, through interviews with experts and relevant stakeholders within public authorities, social partners, industry and employers' associations, employers, employees, safety representatives, and other elected workplace representatives.

Anders Fredriksson, Ph.D., of the consulting firm Vilna, has produced the present report on behalf of the agency. Professor Jerzy Sarnecki of Stockholm University has participated as an advisory expert and subject matter expert.

Associate Professor Carin Håkansta of Karolinska Institutet and Professor Sofia Wikman of the University of Gävle have been commissioned by the agency to review the quality of the report.

Analyst Sanny Shamoun followed by Johan Stenmark has served as the project manager at the Swedish Agency for Work Environment Expertise. Julia Engström has been the responsible communicator.

The authors of this report have chosen their own theoretical and methodological starting points and are responsible for the findings and conclusions presented herein. I wish to thank everyone who contributed to the preparation of this report, and in particular to the interviewees who shared their knowledge and insights.

Gävle, February 2024



Nader Ahmadi, Director-General

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# Why we use the term work-related crime

This report addresses fraud and intentional irregularity in the labour market.

Terms often associated with fraud and irregularity in the labour market are work-related crime, undeclared work, and workplace crime. However, these terms have different shortcomings.

In this report, we will use the term *work-related crime*. What we mean by work-related crime can include work that is declared but where qualified violations of the regulatory framework, fraud, and irregularity in the labor market occur. Therefore, we consider the term undeclared work unsuitable for this report.

This report's data collection is based on the Swedish "Delegation Against Work-Related Crime" definition of work-related crime.

The Delegation's proposed definition, in short, is:

Work-related crime is qualified activities

- that contravene the provisions of laws, regulations, administrative provisions or agreements, and
- are work-related

In establishing whether an activity is qualified, particular attention is to be paid to whether it

- exploits workers,
- distorts competition,
- is organised or systematic, or
- is of a serious or extensive nature.

# Summary

## Background

The Swedish Agency for Work Environment Expertise has commissioned Vilna to conduct a study to gather knowledge and experience from relevant stakeholders concerning work-related crime and its relationship with or consequences for the work environment and systematic work environment management. The aim is to obtain an in-depth picture of the knowledge of relevant stakeholders of how work-related crime affects the work environment and the health and wellbeing of employees, and of interventions to prevent, reduce or impede work-related crime, thus strengthening the work environment and systematic work environment management.

## Method

The study is based on 30 qualitative interviews with representatives of public authorities, trade unions, employer and industry organisations and civil society organisations that have specific expertise in the field of work-related crime and the work environment. The interviews were conducted during the period June–September 2023 based on an interview guide. The interviews were analysed based on the principles of qualitative interviews. Respondents were guaranteed anonymity in order to ensure that they could answer questions candidly. A complementary collection of documents was used to reinforce the results.

## Main results

The trade unions, industry and employer organisations and public authorities taking part in the study are in agreement that it is difficult to study the impact of work-related crime on the work environment. They underline that there is a significant lack of empirical analyses of this relationship. According to interviewees, there are a number of reasons for this, including that work-related crime takes place in the shadows and that the damage it does to the workplace largely goes undocumented in these organisations. The picture painted by the trade unions and public authorities in particular is however that, based on their work in the field, work-related crime can have a negative impact on the work environment that in turn may lead to injury and illness, both physical and mental. Representatives of trade unions and public authorities also testify that employees have suffered extensive physical and psychological harm – and in some cases, even death – in conjunction with work-related crime.

Furthermore, it is apparent that there is no real consensus about how the term *work-related crime* should be applied. The study shows that the term is well-established among the trade unions, public authorities and, to a certain extent, industry and employer organisations participating in the study. Several trade unions and public authorities state that they apply the definition adopted by the government-appointed Delegation Against Work-related crime, and that they

use the term in their external and internal work. The term *work-related crime* has however been the subject of some debate. Industry and employer organisations in particular underline that the word “crime” in itself may be misleading or confusing, given that some of the conduct covered by the definition is not in fact punishable by law. Indeed, some of these organisations reject the term entirely.

According to trade unions and public authorities, certain industries suffer more from work-related crime, and thus the associated work environment problems, than others. Representatives of industry and employer organisations interviewed for the study paint a somewhat different picture of risk industries. Many of the industry and employer organisations claim that few of their members knowingly break the rules.

According to trade unions, public authorities and civil society organisations, people from a foreign background are at greater risk of being subjected to work-related crime than those from a Swedish background. In part, this is because they are more likely to be in a position of dependence on their employer and to have limited knowledge of their rights and obligations as an employee. This category includes asylum seekers, regular and irregular labour migrants, and vulnerable EU/EEA citizens.

Trade unions and public authorities in particular note that other groups on the labour market, such as young people, also risk falling victim to work-related crime. On the significance of gender, trade unions and public authorities consider both women and men to be at risk of falling victim to work-related crime. Industry and employer organisations generally feel that it is unclear whether different groups on the labour market suffer from working-life crime to different extents.

Several interviewees return to the risk that some people may be excluded from the Swedish Model. The Swedish Model entails that the labour market parties- trade unions and employer organizations- rather than public authorities, are primarily responsible for negotiating the rules governing the labor market and ensuring their compliance. Employees who are not unionised, and employers not covered by collective bargaining agreements, are not subject to the controls on employment terms established by the labour market parties. At the same time, the Swedish Model limits the authorities’ ability to exercise control over employment terms.

The study demonstrates that the unions, industry and employer organisations, public authorities and civil society organisations work in various ways to combat work-related crime. This is a matter of both routine work at a strategic and operational level and targeted interventions and working methods. These targeted interventions are rarely specifically aimed at the work environment and systematic work environment management but rather more broadly at combating work-related crime. The study lists some of the targeted interventions by the organisations participating in the study but other stakeholders are also implementing their own initiatives.

Targeted interventions are seldom followed up or evaluated, making it difficult to know what measures actually succeed in combatting work-related crime.



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# 1. Introduction

## Combating work-related crime is a priority issue

The Swedish Government's work environment strategy for 2021–2025 (1) states that law and order in the Swedish labour market must be upheld and that so-called work-related crime has no place there. Target 4 states that we must have a labour market free of crime and cheating, and an unsatisfactory work environment should never be a means of competition.

According to the strategy, the area of work-related crime includes, e.g., breaches of the work environment regulations, but also violations of tax legislation and certain welfare crimes. In its strategy, the Government emphasises that an unsatisfactory work environment should never be a means of competition and that it should not pay to commit crimes or gain advantages by neglecting the right of employees to a safe work environment. Work-related crime can also involve money laundering and fraud committed by stakeholders, employment without a work permit, human exploitation, and human trafficking. According to the Government, in contexts where work-related crime occurs, workers are often at risk of precarious working conditions, low wages, serious violations of their rights, and reduced protection under labour and social security legislation.

The Government has taken several initiatives to combat work-related crime. For example, in 2018, the Swedish Public Employment Service, the Swedish Work Environment Authority, the Swedish Economic Crime Authority, the Swedish Social Insurance Agency, the Swedish Gender Equality Agency, the Swedish Migration Agency, the Swedish Police Authority, and the Swedish Tax Agency were tasked with developing appropriate and effective methods for joint control by public authorities aimed at combatting cheating, rule violations, and crime in working life (2-4). The Swedish Work Environment Authority, together with the Swedish Police Authority and the Swedish Tax Agency, also has a special mandate to start up regional centres to fight work-related crime (5). The plan is for there will be a total of seven centres; there are currently three – in Umeå, Gothenburg and Norrköping (6).

In 2021, the Government decided to appoint a committee in the form of a delegation to work, from a society-wide perspective, as a unifying and supportive force in relation to stakeholders in their efforts to combat work-related crime, as well as to promote collaboration and exchange of experience between them (7). Dubbed the Delegation Against work-related crime, [*Delegationen mot arbetslivskriminalitet*], this committee has so far delivered two interim reports. They are entitled *work-related crime – A definition, an initial assessment of its scope, and lessons learned from Norway* (8), and *work-related crime – Work in Sweden, an assessment of the scope, and lessons learned from Denmark and Finland* (9). [*Arbetslivskriminalitet – en definition, inledande bedömning av omfattningen, lärdomar från Norge, and Arbetslivskriminalitet – arbetet i*

Sverige, en bedömning av omfattningen, lärdomar från Danmark och Finland, respectively]. *The final report on the Delegation's efforts must be completed no later than 28 February 2025.*

In 2022, the Government also presented a national strategy against work-related crime (10). The strategy brings together a number of measures taken within the areas of responsibility of various ministries and public authorities, with the aim of coordinating and focusing the Government's work to combat work-related crime. The Government stated that in order to counteract and combat work-related crime, it must be difficult to circumvent laws and regulations, and that the fight against work-related crime requires better cooperation and collaboration between the stakeholders concerned.

## What is work-related crime?

The Delegation Against work-related crime has defined the concept of work-related crime. Its report, *work-related crime – A definition, an initial assessment of its scope, and lessons learned from Norway* (8), states that work-related crime comprises “sophisticated practices that are contrary to provisions in statutes or agreements and that relate to working life” (see fact box below).

According to the Delegation, work-related crime involves deliberate practices in which an operator, alone or together with others, violates rules or agreements in working life at the expense of employees, other companies, or the public sector.

For example, work-related crime can mean that employees are exploited and that they do not receive the terms and conditions to which they are entitled. According to the Delegation, in order to be considered work-related crime, some norm of conduct must be violated.

At the same time, the Delegation emphasises that not all practices that are contrary to statutes or agreements and that concern working life constitute work-related crime. It is necessary that the practice is conducted in a sophisticated way, i.e., with competence and skill. The question of whether a practice is sophisticated is decided in an overall assessment, in which four circumstances must be taken into particular account, according to the Delegation:

- whether workers are exploited.
- whether competition is distorted.
- whether the practice is organised or systematic.
- whether the practice is of a serious or extensive nature.

If none of the circumstances above exist, or if only one of them is present to an insignificant extent, then according to the Delegation, the practice in question can hardly qualify as work-related crime.

According to the report, many of the practices that should clearly be covered by a definition of work-related crime fall within the scope of so-called “criminality”, that is to say that they can lead to a criminal sanction, such as fines or imprisonment. In the report, the Delegation argues that there is reason to also include breaches of agreements within the concept of work-related crime, even when such breaches are not punishable offences. Furthermore, the Delegation

emphasises that work-related crime is characterised by the fact that the operator often violates several regulations at once. The practices associated with work-related crime can be complex, consist of several rule violations, and last over a long period of time.

According to the Delegation, the definition should also include practices that are not criminalised. In the report, the Delegation points out that this way of applying the concept of crime is broader than the norm:

A specific question is whether the concept of work-related crime should only include practices that are criminalised, or whether other activities should also be covered. From a purely linguistic point of view, it can be stated that the Swedish term for work-related crime, *arbetslivskriminalitet*, can be understood to refer to precisely criminal practices, i.e., *kriminalitet* – criminality (8, pp. 80–81).

## **According to the Delegation, work-related crime is a serious social problem**

According to the Delegation, it is important to remember that an assessment of the extent of work-related crime will always be subject to a great deal of uncertainty. However, on the basis of the Delegation's definition of work-related crime, it has assessed the extent of these practices. Its most recent assessment is provided in the report, *work-related crime – Work in Sweden, an assessment of the scope, and lessons learned from Denmark and Finland* (9). According to the Delegation, work-related crime is widespread in Sweden and a serious social problem (p. 237–242). The Delegation's assessment is based on statistical data from public authorities and the results of empirical analyses. According to the Delegation, the extent of work-related crime in Sweden can be described in different ways. For example, it notes that in 2020, about 6,500 people in the country lacked both registered income and housing. If they do make a living in some way, they do so in the hidden part of the labour market. The Delegation estimates that in 2021, the unreported earned income that can be tied to work-related crime amounted to between SEK 81 and 94 billion.

Overall, the Delegation notes that work-related crime has major negative consequences for individual employees, companies, and the general public. It distorts competition and undermines confidence in the structure of society.

## **Indications of a correlation between work-related crime and the work environment**

There are clear indications of a correlation between work-related crime and the work environment. In the aforementioned report *work-related crime – Work in Sweden, an assessment of the scope, and lessons learned from Denmark* (9), the Delegation discusses occupational accidents in which there are indicators that point to suspected work-related crime (pp. 147–148). The Delegation notes that according to the official crime statistics, in 2021, a total of 2,329 reports of

work environment violations were registered, and 3 people and 108 companies were prosecuted for work environment violations (p. 238). Since 2017, both the number of prosecutions regarding corporate fines related to work environment violations and the monetary amounts of such fines have increased. According to the Delegation, the number of reports of work environment crimes has also risen, both in absolute numbers and as a proportion of all reported crimes. However, they note that there are still a large number of unreported cases, because not all crimes are reported to the police.

## Why the Swedish Agency for Work Environment Expertise studies work-related crime and the work environment

The Swedish Agency for Work Environment Expertise is the country's national knowledge centre for issues relating to the work environment. The Agency is responsible for knowledge building and dissemination, as well as evaluation and analysis. Its mission is to contribute to the practical application of work environment-related knowledge.

In light of the Government's national work environment strategy (in particular Target 4), and Target 8.8 of Agenda 2030's Goal 8 (which is about protecting workers' rights and promoting a safe and secure work environment for all), the Swedish Agency for Work Environment Expertise has initiated a project to analyse work-related crime and its consequences for the work environment. The project consists of three sub-projects that focus in different ways on the consequences of work-related crime for work environments in the Swedish labour market.

As part of the Swedish Agency for Work Environment Expertise's efforts in the area of work-related crime, Vilna has been commissioned to carry out a sub-study. The study gathers knowledge and experiences from relevant stakeholders about work-related crime and its correlation with or consequences for the work environment and systematic work environment management.

The purpose of the sub-study is to

- obtain an in-depth picture of the knowledge of relevant stakeholders of how work-related crime affects the work environment and the health and wellbeing of employees,
- gather knowledge about interventions to prevent, reduce or impede work-related crime, thus strengthening the work environment and systematic work environment management.

This report is designed on the basis of the above two purposes. First comes the "Method" chapter, in which we describe the implementation of the study in general. This is followed by the chapter "The relationship between work-related crime and the work environment". This chapter describes the organisations' knowledge of how work-related crime affects the work environment and the health and wellbeing of employees.

It is followed by the chapter “The fight against work-related crime entails both routine work and targeted interventions”, in which we outline the organisations’ efforts and interventions to prevent, reduce, or mitigate the occurrence of work-related crime, thereby strengthening the work environment and Systematic work environment management. The report concludes with the chapter “Summary and commentary”, in which the key conclusions of the study are summarised and commented.

## 2. Method

The study is based on 30 qualitative interviews with representatives from a selection of organisations with insight into issues related to work-related crime and/or employees' work environment. The participants were selected by Vilna, in dialogue with the Swedish Agency for Work Environment Expertise.

The included organisations fall into four categories:

- public authorities (10)
- trade unions (6)
- employer organisations and trade associations (7)
- civil society organisations (4).

In addition to the interviews with the Swedish organisations, representatives from the Danish Working Environment Authority and the Norwegian Labour Inspection Authority have been interviewed. These public authorities have similar missions to the Swedish Work Environment Authority. The equivalent authorities of Sweden's two neighbouring countries are included to provide an idea of their efforts within this area.<sup>1</sup> Two interviews were conducted with the Swedish Work Environment Authority. Appendix 1 contains a list of the organisations that contributed to the study.

As far as the public authorities are concerned, the ambition was to include those that have special expertise in issues related to work-related crime. To this end, all public authorities that are collaborating on the government mandate to combat work-related crime were included, as well as the Delegation Against work-related crime. With regard to trade unions and employer organisations and trade associations, the aim was to include the parties' overarching umbrella organisations, i.e., the Swedish Confederation of Trade Unions (LO) and the Confederation of Swedish Enterprise, as well as organisations that organise employees and companies in sectors with a high risk of work-related crime.

### Qualitative discursive interviews

The interviews were conducted during the period of June– September 2023. They were usually attended by one person from each selected organisation. However, in some cases, two people participated. This means that the study includes voices from 35 experts on issues regarding work-related crime and/or the selected organisations' work environment.

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<sup>1</sup> Finland's equivalent of the Swedish Work Environment Authority was also contacted for an interview, but did not respond despite repeated attempts to get in touch with them.

## **Selection of interviewees**

In the selection of interviewees, the aim was to talk to the person(s) within each organisation who have the deepest insight into issues regarding work-related crime and the work environment. The paths leading up to the interview varied between the organisations. For some of them, the public authority recommended contact persons. With regard to the selected public authorities, their representatives in the national steering group for the Government's mandate to combat work-related crime were contacted.

## **Implementation**

The interviews were based on an interview guide, thus ensuring that the interviewees answered more or less the same questions. However, the guide was designed to make it possible to adapt the interviews to the various missions and conditions of the organisations and interviewees, as well as to the reasoning of the respondents. The respondents were asked to clarify and elaborate upon their various ways of thinking. The interview questions in the guide were developed in dialogue with the Swedish Agency for Work Environment Expertise.

The interviews were usually conducted via Teams and lasted about 1 hour. In some cases, the interview was conducted over the phone, and one organisation chose to answer the questions in writing. In order for the respondents to feel free to openly describe their organisation's work and assessments, even preliminary ones, the interviewees were guaranteed that they would be allowed to remain anonymous in relation to specific statements in the report.

## **Analysis**

In cases in which the respondents were asked for and granted consent, the interviews were recorded. Written notes were also taken.

The interviews were analysed on the basis of some common principles for discursive interviews (11). This means that the interviews were reviewed to find recurring themes in the respondents' descriptions, in relation to the various interview questions and the overall questions in the study. Once identified, these recurring themes were described and then formed the basis of this report.

## **Additional collection of documents**

During the interviews, written documentation was requested describing the organisations' standpoints and efforts in the area of work-related crime. These background documents has been used as a supplement to the interview material. This is particularly true in the section that deals with the organisations' described efforts and interventions to combat work-related crime.

## **Limitations of the study**

When, as in this study, the goal is to capture various views and experiences related to complex phenomenon, qualitative interviews have an advantage.



They are an effective approach to capturing experts' knowledge and practical experiences, especially when there is a lack of documented evidence. At the same time, there are limitations to such an approach:

First, the selection of organisations has an impact on the pictures that emerge in the study. Even if the selection is aimed at organisations familiar with the area, it is not impossible that a different selection would have yielded somewhat different pictures of the relationship between work-related crime and the work environment, or of interventions to combat work-related crime. This means that the results can only be said to apply to the organisations included in the study.

Secondly, an organisation's collective knowledge and experience of a complex phenomenon, such as work-related crime and the work environment, cannot be captured in a single interview with only one or two employees. In several cases, it was clear that within each organisation there are additional people who can develop and nuance the organisation's picture of the area.

Limitations However, the number of interviews researchers managed to conduct has meant that it has rarely been possible to follow up such leads. As mentioned, to get a broader picture of the organisation's perspective on the area, reports and other documentation were requested that can supplement the reasoning of interview respondents.

### **3. The relationship between work-related crime and the work environment**

This chapter responds to the first aim of the sub-study and describes how the organisations included in the study view the relationship between work-related crime, the work environment, and employees' health and wellbeing.

#### **The concept of work-related crime is understood in different ways**

The study shows that there are diverse views on the concept of work-related crime among the interviewed organisations.

#### **Different views regarding the concept of undeclared among different types of organisations**

The study shows that among the types of organisations that the study covers, there are general differences in their views regarding the concept of work-related crime and its relationship to the work environment. It seems that trade unions, public authorities, and civil society organisations use the term “work-related crime” and have adopted the Delegation’s definition of what it is. As a rule, these organisations also see strengths in the way in which the Delegation has defined work-related crime. Trade associations and employer organisations in the study are generally more hesitant to use the term “work-related crime” and see advantages in other word choices. They also tend to be more hesitant about the Delegation’s definition and see weaknesses in it. Among the industry and employers’ associations, there are also some who completely reject the concept of work-related crime.

At the same time, there are nuances in this overall picture of the differences between the types of organisations in the study. For example, a few representatives of public authorities express some doubts about the concept of work-related crime. There are also examples of employer organisations and trade associations that explicitly adhere to the Delegation’s definition of work-related crime.

#### **The majority have adopted the Delegation’s definition**

As stated in earlier parts of this report, the Delegation Against Work-related crime has developed a definition of work-related crime. Both in the interviews and in the written documentation, it can be seen that several of the organisations in the study base their approach on this definition. The public authorities, trade unions, and civil society organisations in the study express that they use the Delegation’s definition. Some of the industry and employers’

associations, but not all, have also adopted it. With regard to their respective organisation's adoption of the Delegation's definition, some interviewees express it thusly:

There should be competition on equal terms. We support the proposed definition from the Delegation Against work-related crime. Work-related crime comprises qualified practices that are contrary to provisions in statutes or agreements and that relate to working life.

– *Industry and employers' association*

We use the Delegation's definition as a starting point. Then there are different areas of use for it in our organisation. We think about how we can use it in practice.

– *Public authority*

We have quite fully adopted the definition developed by the Delegation. We think it's important to have a common understanding of the concept.

– *Trade union*

To agree with the Delegation's definition of work-related crime means seeing it as a broad concept that goes beyond breaking laws. The impact of the broader definition of work-related crime can be seen in the interviews and the documentation. It is clear that several of the organisations view work-related crime as going beyond criminal practices:

Work-related crime is a very broad concept. It can encompass criminal activities, but it can also entail deliberately breaking rules, for example regarding the work environment.

– *Public authority*

The delegation's definition is thus well-known and used by numerous organisations in the study. At the same time, it is clear from the interviews that the organisations have somewhat different views of what, in concrete terms, it means that the practices need to be "sophisticated" and "deliberate". In particular, industry and employers' associations take a stricter view, pointing out that work-related crime should only include violations of the law, but not include breaches of agreements. Thus, there are some who do not support the part of the delegation's definition that specifies that breaches of agreements should also be included.

## **Perceptions of strengths and weaknesses in the Delegation's definition**

The interviews indicate that there are diverse views on the advantages and disadvantages of the Delegation's definition. The public authorities, trade unions, and civil society organisations in the study usually express that it is good, while the industry and employers' associations in particular see problems with the definition. The organisations that emphasise their agreement with the definition often point out that it has been developed to fit Swedish conditions, where some aspects of working life are regulated by law but others are also regulated by agreement between the parties.

We don't add anything to the Delegation's definition. We haven't given it another thought. We're more focused on our issues, on forced labour. We're satisfied with the existing definition, since the exploitation of workers is mentioned.

– *Public authority*

We think the Delegation's definition is good. We see no reason to have one of our own. It's good because it also includes breaches of agreements and not just laws. It's reasonable and manageable. That makes a fundamentally good definition. It's important to have agreements, because collective agreements give us unions other possibilities for action.  
– *Trade union*

The industry and employers' associations that see problems with the definition point out that it is misleading or confusing to talk about work-related crime using the Swedish term *arbetslivskriminalitet* [which includes the word "criminality"], when some of the practices covered by the definition are not, in fact, punishable offences:

We talk about how the definition of work-related crime [*arbetslivskriminalitet*, literally "working life crime", often also translated to "work-related crime"], is misleading. I think the concept of crime should be reserved for things that are criminal. It's not a crime to breach an agreement. The term we use should be immediately understood, without having to think about it. "Unhealthy competition" is a broader and better term.  
– *Industry and employers' association*

## **Some reject the concept of work-related crime**

Several of the industry and employers' associations in the study reject the concept of work-related crime. Some of them point out that "unfair competition" and "labour market crime" are more applicable terms.

For example, the Confederation of Swedish Enterprise writes that it is time to switch to "labour market crime" and instead use the vulnerability of companies as a starting point. This shift in focus would also help combat work-related crime, they argue. In their report *Labour Market Crime* [*Arbetsmarknadskriminalitet*](12), the organisation writes:

Part of labour market crime consists of work-related crime, i.e, crime in working life. But the concept of work-related crime focuses on employees and working life, when the origin of all cheating takes place in (and is directed at) companies, which in turn leads to consequences for working life (p. 3).

Certain employer organisations and/or trade associations in the study completely reject the concept of work-related crime and describe that they do not use the term.

We don't use the term "work-related crime" [again, here the inclusion of the word "crime" in the Swedish term *arbetslivskriminalitet* is key]. Our starting isn't the criminal aspect; we want our member companies to do the right thing, and for it to be easy to do so.  
– *Industry and employer organisation*

## **Challenges in identifying work-related crime within the work environment area**

This study focuses on the relationship between work-related crime and the work environment. It points to challenges in identifying work-related crime within the work environment area. This is because it is not entirely clear what

can be considered work-related crime in the work environment area. There are also great difficulties in studying the impact of work-related crime on the work environment, which further complicates the situation.

## **It is unclear what constitutes work-related crime within the work environment area**

Several of the interviewed organisations emphasise that not all violations of norms and rules in the work environment area are to be regarded, by definition, as work-related crime. When violations are not deliberate, but instead due to, e.g., ignorance, it is not appropriate to discuss them as work-related crime. The interviewees point out that in real-life scenarios, it can be difficult to know what is a deliberate practice and what is not. For example, a representative from a trade union says that “the question is what is systematic”, and another representative from another union notes:

In our industry, our employers often have little knowledge of the rules for the work environment. What I mean is, they make mistakes due to ignorance, rather than deliberately. But some do it out of malice, too.

– *Trade union*

If there are shortcomings, ignorance is to blame. For us, it's about getting companies to see that “what you think is right isn't actually right”. We usually work *with* the company, to get the company to do the right thing.

– *Industry and employers' association*

Even if it is assumed that work-related crime should entail deliberate and sophisticated practices, it can be difficult to define what constitutes work-related crime in the area of work environment. According to the interviewees, there is a wide range of practices in the work environment, from very serious violations to less serious ones, that could be considered to constitute work-related crime. Some believe that it is pointless to talk about work-related crime in relation to the work environment, because the regulations regarding the work environment are so vague:

I wouldn't say that work-related crime has any relationship at all to the work environment. There are complicated regulations regarding the work environment, a big regulatory burden. As a small company, there's a ton that you have to know. It's inhumane.

– *Industry and employer organisation*

Some of the interviewees also point out that changes to the Work Environment Act have made it even more difficult to talk about work-related crime in this area. On 1 July 2014, changes were made in the area of work environment that meant that penal sanctions were largely replaced by administrative fines. One of the trade associations/employer organisations in the study believes, for example, that the changes to the work environment regulations make it less useful to talk about work-related crime in the work environment area:

In the past, there were more punishable work environment-related crimes. A lot was decriminalised. The term “work-related crime” [again, *arbetslivskriminalitet* has a more direct association with criminality] is less applicable now.

– *Industry and employers' association*

## **The relationship between work-related crime and the work environment is difficult to study**

When the representatives from the organisations were asked to describe the connection between work-related crime and the work environment, several of them – from public authorities, trade unions, and industry and employers' associations – said it was difficult to say anything with certainty. There are many challenges to studying the relationship between work-related crime and the work environment. Moreover, employers that implement work-related crime often strive to keep their activities hidden and rarely leave any trace in official registers. The interviewees point out that there is a lack of relevant statistics that would enable the follow-up of work-related crime in several areas. This means that there are limited opportunities to establish the connection on an empirical basis:

It is reasonable to assume that stakeholders that have a criminal setup don't protect the work environment. But as for coming up with evidence ... establishing causal relationships is difficult.

– *Public authority*

There are many vested interests and subjective speculations about this. One industry wants to highlight the bad examples. It's true that many people talk about work-related crime, but very few are able to lay out the facts of the matter.

– *Industry and employers' association*

In a report (13), LO presented the following reasoning about the prevalence of the phenomenon:

It is difficult to estimate exactly how widespread work-related crime is. The difficulty lies in its nature. It often involves black/grey market business, with a lot of unreported cases. Work-related crime is also complex in nature and constantly changing. New criminal schemes rise in the place of old ones as soon as they shut down. This makes it difficult to estimate exactly how extensive the problems are (p. 11).

## **Experience shows that work-related crime can lead to shortcomings in the work environment**

It is therefore difficult to prove a connection between work-related crime and the work environment using the available data. Despite this, the experience-based picture of many of the organisations is that there is a correlation. Work-related crime can give rise to deficiencies in the physical, and psychosocial work environment.

This is due to a desire among some operators to make money by deliberately cheating on the work environment regulations.

### Physical and psychosocial environment

- The *physical* work environment includes aspects such as protective equipment, ergonomics, noise levels, lighting, air quality, opportunities for safe lifting, and handling of chemicals.
- The *psychosocial* work environment encompasses both the organisational and social aspects of the workplace. It includes the terms and conditions related to management and governance, communication, participation, distribution of tasks, as well as demands, resources, and responsibilities. Additionally, it covers the social interactions, cooperation, and social support from managers and colleagues, which together influence the overall work climate, employee well-being, and work performance.

## Can give rise to deficiencies in the physical, and psychosocial environment

While the organisations in the study emphasise that it is difficult to study the connection between work-related crime and the work environment, several of them describe that such a correlation exists. Rather than referring to research or other analyses, the interviewees highlight experiences of having seen and heard about examples of work-related crime that can give rise to an unsatisfactory work environment.

There's a clear connection. When work-related crime occurs, people are exposed. We've noticed this, but it looks a little different in different industries.  
– *Public authority*

I don't have any hard evidence about it, but it goes without saying, if my wages are too low and I don't have a secure job. In our cases, we see that employees have been exploited. But they're often afraid. I know what I've come across. But we don't keep any statistics that prove a correlation with work-related crime. Still, my feeling is that an employer who exploits its staff doesn't know what SWEM<sup>2</sup> is. If you're systematic and deliberate about cheating the system then you don't have much interest in the work environment.  
– *Trade union*

Work-related crime can lead to shortcomings in the physical, and psychosocial work environment. The interviews reveal examples of how work-related crime can give rise to deficiencies with regard to all three aspects of the work environment. However, several of the interviewees return to the fact that problems in the physical work environment are easier to detect and see, e.g., during inspections, but also in the statistics on workplace accidents. The severity of the shortcomings can vary, and according to the interviews, work-related crime does not always translate into an unsatisfactory work environment. For example, an operator can cheat on their taxes but offer employees a good work environment.

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2 Systematic work environment management (SWEM).

I see how work-related crime can negatively affect the physical, and psychosocial work environment. For example, that it can lead to having to work to many hours, a lack of the right personal protective equipment, or put workers in a position of dependence, for example because their employer paid for them to travel to Sweden. We've received a lot of reports of threats and violence.

– *Trade union*

In the most acute cases it's physical safety that suffers. But subordination, being put in a psychosocially inferior group, is toxic. Feeling like you don't have the right to a secure life, that you're just reserve manpower. Exploitation falls in the grey area between crappy jobs and human trafficking. It's when you're completely deprived of agency.

– *Civil society organisation*

According to the interviews, it appears that there are shortcomings in the physical work environment that correlate with work-related crime. Examples of such deficiencies include a lack of access to necessary personal protective equipment, such as the lack of steel-capped shoes for workers in restaurant kitchens, the lack of helmets on construction sites, or the lack of splashbacks and protective gloves when working with chemicals. They can also extend to safety measures in workplaces, such as inadequate scaffolding or insufficient ventilation in nail salons where chemicals are used. Interviewees also mention that work-related crime can affect the physical environment outside the workplace. Workers may be forced to live in cramped conditions and sleep on worn-out mattresses, and in some cases live in quarters without no windows or natural light, or where there are only small basement windows.

At nail salons, we know that a ventilation system is important. But there isn't always one.

– *Public authority*

Sometimes we encounter people who've made their own personal protective equipment.

– *Civil society organisation*

You're expected to do hard work, but don't always have safe equipment, for example when climbing on roofs. Or maybe get places to sleep that are so substandard, for example living in a basement. We often see people living in or close to their workplace, sometimes under very difficult conditions.

– *Civil society organisation*

When it comes to shortcomings in the psychosocial work environment that are linked to work-related crime, the interviewed organisations point to several problems. Among these are long shifts, six-day weeks, and short rest periods (or none at all).

The organisations have also encountered workers who receive little or no compensation for all or part of their work. The interviewees repeatedly describe employers who force employees to pay back all or part of their wages after the money has been deposited into the employee's account. They also offer descriptions of indebtedness, i.e., when an operator claims that an employee owes them money when costs for housing, transport, work clothes, etc., have been deducted from their wages. Sometimes the employee only realises later that they have been cheated.



Things go badly for them, and they may have borrowed money to come here and need to send money home. They end up in a hostage situation.

– *Trade union*

Employees are often in a position of dependence, for example because their employer paid for their travel. You're in debt to your employer, who, for example, rents out a home and deducts it from your wages. [...] It's often a difficult situation, because the workers have signed an agreement that releases the employer from responsibility. They've agreed to things without understanding what it would mean. Sometimes the conditions are almost slave-like.

– *Trade union*

The interviewees describe in various ways that the social work environment can be negatively affected when work-related crime occurs. It is repeatedly mentioned that employees may be in a position of dependence on the employer that prevents them from daring to voice their views about inadequate working conditions, or from contacting and joining a union. Interviewees also report incidents of threats and violence from both employers and customers. This can be an issue for people working as cleaners in the homes of private individuals. In other situations, the operator is involved in organised crime and has the power to inflict a lot of violence. LO writes (13):

Many vulnerable workers also feel that they are being blackmailed, because they're afraid to report something due to the risk of reprisals or, in the worst case, violence (p. 13).

Employers can threaten violence, or exercise violence, and sometimes these people have the power to do a lot of physical harm. It also plays a role in the vulnerability of employees. They target people who are in a vulnerable position, who have no way out or can't say no.

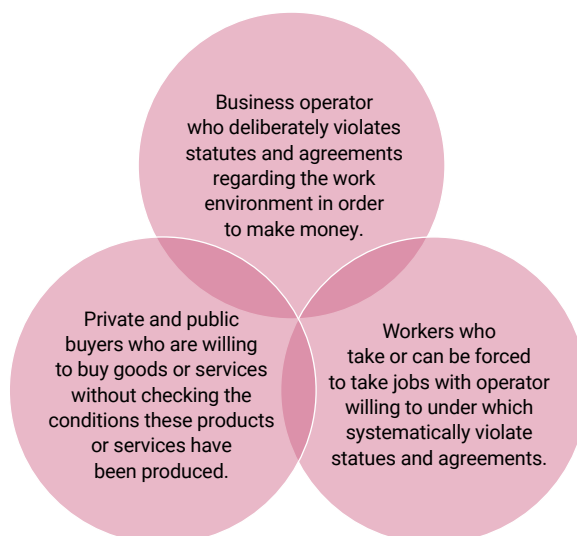
– *Civil society organisation*

## **A desire to make money without following the rules**

When it comes to the connection between work-related crime and an unsatisfactory work environment, the study indicates that it stems from the interplay between multiple circumstances. From the interviews in the study and the documentation, it appears that for a correlation to occur, the following conditions must exist:

- operator who deliberately violates statutes and agreements regarding the work environment in order to make money
- employees who accept or are forced to take jobs from an operator who is likely to systematically violate statutes and agreements concerning the work environment
- private and public buyers who are willing to buy goods or services without checking the working conditions under which these goods or services were produced.

**Figure 1.** The conditions required for an unsatisfactory work environment to occur in connection with work-related crime.



The public authorities and trade unions in the study underscore the fact that the relationship between work-related crime and the work environment is driven by money:

There is definitely a connection, and that connection is money. It's all about gaining competitive advantages by squeezing costs. And a good work environment is expensive. It's easy to cut back.

– *Trade union*

Yes, it's all about money. Exploitation is about making money. You don't pay taxes, don't have a good work environment. Unhealthy competition will occur.

– *Public authority*

Take the simplest example: I want to order solar panels. One supplier is cheaper, and it's the one that doesn't want to sue scaffolding. The ones that have a safe work environment can't keep their prices low enough to win procurements. If you get your nails done for next to nothing, it goes without saying that this person doesn't have the right training, doesn't have a collective agreement.

– *Public authority*

From the interviews and the written documentation, it appears that there are several systemic factors that create the conditions for work-related crime.

## **The Swedish labour market model**

The interviewees describe that in Sweden, the amount of government regulation in the labour market is relatively limited compared to several other countries. The parties are expected to jointly negotiate wages and terms of employment. The interviewees describe that collective agreements are important, both for trade unions and employers, as they help prevent unhealthy competition through poor work environments. For this reason, both the trade unions and the employer organisations push companies and employees to organise. However, companies and employees can choose not to sign collective agreements. In the interviews, respondents emphasise that operators that are willing to deliberately violate statutes and agreements regarding the work

environment in order to make money may have good reason to resist unionising and avoid collective agreements:

I've followed the development for many years. As things stand today, we see bad actors taking advantage of the opportunities. For example, 30 years ago, almost all construction companies had collective agreements.

– *Public authority*

It is also described that the system is affected by employees who choose not to join a trade union. There may be several reasons for this, according to the interviews. For example, workers may have several odd jobs in different industries and cannot be members of a union. Or they may have had bad experiences with trade unions, in Sweden or other countries. They may also be afraid of losing their jobs if they join.

When operators and employees aren't unionised, it means that both parties end up outside the process for ensuring fair wages and employment conditions. But they also end up outside the control mechanisms inherent the follow-up of collective agreements. Since the Swedish labour market is subject to little government regulation, authorities' hands are more or less tied when it comes to cracking down on things like low wages.

There's no lower limit for wages or housing conditions, for example. I know that the Swedish Prosecution Authority has problems pursuing prosecutions. Where's the line for when something becomes prosecutable? It's case by case; it depends on individual relationships.

– *Public authority*

Without a collective agreement, it's just a matter between the employer and their employees. Sure, we meet workers who think that it's wrong for their employer to import employees to Sweden to live in a basement. But those who choose to remain outside the Swedish Model have no trade union to turn to.

– *Public authority*

Very few people in our association are unionised. It's very common to get scammed in our industry.

– *Trade union*

Where do you draw the line about what's criminal? If you don't pay someone's salary, you're violating a collective agreement, but it's not against the law.

– *Trade union*

## **Limited control capabilities of the public authorities**

Several of the interviewees point out that the occurrence of work-related crime that can lead to shortcomings in the work environment is also tied to the public authorities' inability to control workplaces. According to the Swedish Model, it is primarily the parties, not the public sector, that negotiate the rules for the labour market and follow up compliance. As one representative from a public authority puts it, "There is no government control of collective agreements".

The public authorities' opportunities for control are conditional on the regulations in each field. The interviews reveal views on the effectiveness of

the regulations with regard to work-related crime. Respondents emphasise, for example, that work environment legislation in particular is rather limited, somewhat vague, and mainly focuses on promotion and prevention. The interviewees describe that it is difficult for the Swedish Work Environment Authority to crack down on shortcomings in the work environment.

Precisely, the work environment regulations are difficult to apply. They're so vague [...] It's one thing that according to the rules, you have to follow up, risk-assess, and remedy. But it's hard to getting a handle on it on-site, in your practical work. OSA issues<sup>3</sup> are especially difficult. It's one thing to deal with physical things, like ventilation. But how do you measure stress? It's tough to say what level of stress is unacceptable when it's hard to apply objective criteria. That leaves more room for interpretation, both by the inspector and the employer. The Swedish Work Environment Authority usually cracks down on inadequate SWEM procedures, rarely on OSA issues.  
– *Trade and employer association*

A few of the interviewees say that it is unreasonable to believe that the public authorities will be able to combat work-related crime through inspections and controls or by taking cases to court.

## **Globalisation, mobility and migration**

Another factor that has an impact is the globalisation of society, the increased integration between countries, and the increasingly free movement of people and organisations that have developed and become the norm in recent decades. Globalisation, mobility, and migration mean that there are many people with a foreign background who come to Sweden to work, temporarily or permanently, sometimes in accordance with the regulations, and sometimes not.

Based on our interviews and the documentation to which we have had access, it appears, among other things, that Sweden's membership in the EU and the system for labour immigration and refugee immigration have led to an increased number of employees who accept or are forced to take jobs from operators that are willing to systematically violate statutes and agreements regarding the work environment.

For example, here is how a couple of the organisations in the study tie EU membership and the system for labour immigration to work-related crime. These descriptions are from the Rescue Mission (14) and LO (13), respectively:

The differences in working and living conditions within the EU have led workers from poorer areas to seek to come to Sweden and sometimes be exploited by bad actors (p. 8). In 2008, liberal rules were introduced regarding labour immigration in Sweden, which in principle made it possible for Swedish employers to unilaterally decide who they bring in from third countries. Without labour market testing, without the requirement for binding employment contracts covering wages and working conditions, without the requirement for full-time employment, no maintenance requirements for relatives, and hardly any control at all by the public authorities (p. 8).

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3 Organisational and social work environment.

But according to some of the organisations in the study, people also come to Sweden in ways that go against the existing regulations on free movement and labour immigration:

There's a major influx of many foreign workers, for example in industrial ventures in Norrland, with people who are in the country illegally. Often without personal protective equipment, no protection against asbestos, no fall protection.

*Public authority*

Globalisation and freer movement have also meant that foreign businesses can operate in Sweden in different ways than before. In the first place, the trade unions in the study describe that companies based in, e.g., another EU country, which may not be covered by the collective agreements, can carry out work in Sweden. In some cases, the desire to win procurements and make money drives their decision not to follow work environment rules or other standards.

### **Specialisation of the labour market and multi-level subcontracting**

Some of the representatives of the unions in the study also describe a trend towards increased specialisation of the labour market, in the sense that companies more often focus on offering one type of service or product, rather than having all competence and skills available "in house". According to the interviews, there are now far more small stakeholders in certain industries, and this trend is reflected both in Sweden and abroad.

This, in turn, leads to complex supply and production chains with multiple subcontractors, often in multiple stages:

Swedish often have maybe five drivers, but then they hire carriers to handle various stages. The company sells the transport at different stages. You have sub-hauliers with which you have agreements, maybe in four or five stages, to maximise as much as possible. In that case, drivers from different countries are often hired.

– *Trade union*

In the large industrial projects in Norrland, we see our work being broken up. All of a sudden, there are five or six contractors. That leaves room to get creative.

– *Trade union*

When there are many different operators at several levels, the risk of work-related crime increases, according to some of the trade unions. This makes it more difficult for the end customer to control who is on a site or involved in a supply chain. It also makes it more difficult for the parties to follow up collective agreements. An interviewee from one of the trade unions says that "as soon as there's any uncertainty, opportunities to cheat arise". One consequence described by the interviewees is that in one and the same workplace, there may be employees with very different working conditions; the employees of Swedish companies with collective agreements may have completely different conditions than the employees of foreign companies.

If you want to cut costs, then it's the work environment you usually save on first, for example not building a scaffold or putting up workmen's shelters. That results in a poor work environment. [...] You hear sad examples, for example that the foreign workforce has to go as far as two kilometres to go to the toilet –two kilometres! And so they end up peeing and pooping off a spiral staircase. Meanwhile, the Swedish companies has set up barracks for their staff.

– *Trade union*

The marketisation of welfare production, i.e., the use of subcontractors by the public sector for service production, is another factor that the organisations describe as having an impact on the incidence of work-related crime. This has been described, for example, by LO (13):

Furthermore, it also leads to various types of welfare crime, such as cheating tied to the assistance and the home care, as well as subsidised employment (p. 7).

### **Buyers' willingness to put squeeze prices in an increasingly strained economic situation**

The trade unions, industry and employers' associations, and public authorities in the study all describe that both demand and a willingness to squeeze prices mean that some buyers are willing to buy goods or services without checking the work environment conditions under which these goods or services have been produced. These are partly private buyers – for example, private individuals, companies, and housing associations. Representatives from several of the organisations describe that private individuals who want to keep their costs down do not seem to wonder why nail treatments, beard trims, car washes, or kitchen renovations can be so cheap. They also describe that companies buy goods and services from subcontractors with low prices, without assessing whether the conditions are fair for those who work there.

“A 20 Euro carwash?! Damn, that's cheap.” But we don't think about what it takes for it to cost so little. We've turned a blind eye to it in our society; we think things are better now, and we've gotten a bit lax. But this is just growing and growing. Everyone has a responsibility to think before they buy.

– *Trade union*

As individuals, we can't keep thinking that the cheapest option is the best one. We have to make the decision to pay a little more. We have to be conscientious consumers.

– *Public authority*

Trade unions, industry and employers' associations, and public authorities say that public buyers are also to blame, i.e., Sweden's municipalities, regions and the State in their role as procurers. In several interviews, respondents stressed that municipalities do not always have control over who wins a procurement. For example, a representative of a trade union describes that “procurements have major consequences and can mean that respectable players are eliminated”.

Labour is exploited, and people aren't paid for their work. It happens. I actually would argue the problem is most prevalent in the public sector. Many municipalities don't have the resources to investigate these aspects during procurements, and they're not allowed to set requirements for collective agreements. That opens the door for all sorts of crooks. Especially in the small municipalities.

– *Industry and employers' association*

Last winter, we audited the cleaning services used by some of the municipalities. Among other things, we discovered illegal workers among school janitorial staff.

– *Public authority*

Various factors push buyers to squeeze prices. Interviewees mention that in EU public procurements, it was previously required that contracts be awarded based on the lowest price, and that this way of thinking persists among several public stakeholders. They also note that public stakeholders cannot require collective agreements in their procurements. Yet in these trying economic times, private individuals, companies and municipalities, among others, are all feeling the pressure of rising costs due to inflation. At the same time, Sweden's economy is slowing and it is expected to become more difficult for many to get both business and income from taxpayers who are feeling the pinch.

## **National and international criminal networks**

According to the organisations in the study, there is also a link between work-related crime and organised crime. There are operators whose whole business idea is to break laws in order to make money, using companies as a façade. Some of the organisations express the view that such activities or networks can contribute to various types of crime, of which work-related crime practices are a part.

For example, a representative of a public authority says that “both in organised crime and work-related crime, people are often breaking multiple laws at once”:

It's easier to run a business than to commit aggravated robberies. There are serious criminals running some of our companies.

– *Public authority*

There's a lot of crime swirling around these companies. For example, illegal liquor purchases, wages that workers are forced to return, and women who end up in prostitution. To raise money, there are sometimes also burglaries, folks who steal catalytic converters and whatnot. We see criminal companies in our industry.

For example, we have a company that exploited 100 Ukrainians. They had 6–7 people living in a one-room apartment, and they weren't allowed to talk to anyone outside the gates.

– *Trade union*

## Certain groups in the labour market are most affected

The study indicates that certain groups in the labour market are more affected by work-related crime that leads to shortcomings in the work environment. Overall, we have heard that foreign workers, such as asylum seekers, labour migrants from third countries with work permits, and irregular labour immigrants are more often hit harder than the Swedish population. At the same time, other background factors also have an impact and often work in combination, e.g., educational background, knowledge, and age.

Both women and men are affected, but because these groups often work in different industries, the two groups can face different types of deficiencies.

## Some industries are more affected

Both among the trade unions, industry and employers' associations, and the public authorities in the study, there is a perception that it is difficult to actually know which industries are most affected. This is because work-related crime is a difficult phenomenon to study. The industry and employers' associations, but also the civil society organisations, emphasise that it is hard to comment on differences between industries:

There may be a connection, but we find it difficult to comment on what it might be. In segments where the threshold for entering the market is low and as a result the competition really cutthroat, there may be a risk of disregard for the law and regulations.  
– *Industry and employers' association*

In both the interviews and several of the written documents provided by the trade unions and public authorities, respondents note that work-related crime seems to be more prevalent in certain industries. Labour-intensive sectors in particular are singled out. For example, the public authorities that are participating in the joint government mandate have made an overall assessment based on a survey in which all these authorities were asked which industries are most vulnerable when it comes to unhealthy competition in the form of work-related crime. The public authorities describe the following sectors (15) as being at high risk for work-related crime:

- Waste management/water supply
- Construction
- Car care
- Agriculture and forestry
- Body care/other service activities
- Hospitality
- Cleaning services
- Transport
- Health and social services.



The argument that these constitute high-risk industries is supported by the Delegation's analyses (9, pp. 142–143). Some organisations highlight other sectors and note that work-related crime can also occur in sectors that are not traditionally associated with this phenomenon.

We're talking about various high-risk industries, and I think it's in those where the problems are really big. But there may be issues in other industries as well, for example where foreign workers are well paid but where they don't get holidays. I don't think we should forget to look beyond the usual suspects.

– *Public authority*

Representatives of industry and employers' associations interviewed for the study paint a somewhat different picture of risk industries. Many of the industry and employers' associations claim that few of their members knowingly break the rules.

For example, in the report *Labour Market Crime – how are companies affected and what needs to be done? [Arbetsmarknadskriminalitet – hur påverkas företagen och vad behöver göras?]* (12), the Confederation of Swedish Enterprise emphasises that cheating entrepreneurs exist in all sectors and more frequently in some, but that it is risky to single out specific industries:

Several industries are described as corrupt and criminal, and headlines about organised crime's infiltration of companies are common in the media. There is a danger of pigeonholing certain industries, in whole or in part, as criminal enterprises, without any factual basis. That can become a self-fulfilling prophecy. From a political point of view, there must be an understanding that even though criminal actors and cheating entrepreneurs exist in all industries and more frequently in some, most companies and entrepreneurs do actually want to abide by the law (p. 4).

## **Foreign workers are more frequently affected**

According to the public authorities and civil society organisations in the study, foreign workers are more often affected by an unsatisfactory work environment resulting from work-related crime. The documentation in the study shows that compared to other groups in the labour market, members of this group are more likely to accept or be forced to take jobs with operators that are willing to cheat. According to some of the interviewees, this is due to the fact that foreign labourers are more likely to be less well-educated and are thus more vulnerable in the labour market. People with a foreign background have often come to Sweden via a work permit arranged by their employer, which lands them in a position of dependence on the employer. Interviewees also underscore that people with a foreign background are less familiar with the work environment rules in Sweden and are accustomed to other work environment cultures from their countries of origin.

However, not everyone with a foreign background is at risk of being exposed to work-related crime. Certain groups of foreign workers are more at risk. The Delegation Against Work-related crime identifies (9) the following groups as being particularly vulnerable to labour exploitation (pp. 123–131):

- asylum seekers exempt from the normal work permit requirements
- labour immigrants from third countries with a work permit
- third-country nationals who have a work permit in other EU/EEA countries
- secondees and workers from other countries posted abroad in Sweden
- EU/EEA citizens
- irregular labour migrants
- third-country nationals with a residence permit for higher education studies.

In the interviews, the public authorities and civil society organisations repeatedly mention examples of how these risk groups can end up in an unsatisfactory work environment:

People who come here on work permits are more vulnerable. We often hear about employers who threaten to call the police on them.

– *Public authority*

People are systematically recruited to Sweden. And those living here with low incomes, like asylum seekers – they're in an especially weak position. Employers know that and take advantage of it. So-called undocumented immigrants are in really dire straits; they end up in vulnerable situations.

They target people who are in a vulnerable position, who have no way out or can't say no.

– *Civil society organisation*

According to some representatives of the public authorities and civil society organisations, there is a “shadow society” of unpermitted immigrants in Sweden. They are at an exceptionally high risk of being subjected to an unsatisfactory work environment tied to work-related crime, because societal actors do not even know that they are in the country:

During inspections, we've seen people just run away. I really wish we would try to reach out to them. These employers have not even applied for permits from us. We gave no idea how many people are living in the shadows.

– *Public authority*

## **Educational background and age can also play a role**

It is not only foreign workers who risk being subjected to an unsatisfactory work environment resulting from work-related crime. The material in the study shows that people with temporary employment or so-called “precarious” employment, people with little or no education (including those born in Sweden), and to some extent younger people, are also at risk. These groups are at risk of encountering work environment deficiencies that are tied to work-related crime, for the same reasons as some foreign-born people, i.e., because they have a weaker position in the labour market, are generally less educated, and do not have as much knowledge about the requirements can be imposed on a workplace.

In terms of the risks posed to young workers, some of the interviewees point out that businesses that engage in work-related crime practices tend to recruit younger and thus generally stronger and more resilient people. Younger people may also be more likely to accept shortcomings in their working conditions, according to some. But this picture is not clear-cut; some organisations downplay the importance of age.

A lot of the time, we're talking about physically demanding jobs. Most of the workers are 20-40 years old, in the prime of their lives. Younger people are thus more affected by these practices.

– *Civil society organisation*

You can get into trouble at any age. The younger you are, the more empty-headed you can be, so to speak. You have a different appetite for risk.

– *Public authority*

## **Both women and men are affected**

There is a significant consensus among the trade unions, public authorities, and civil society organisations in the study that both women and men are affected by unsatisfactory work environments resulting from work-related crime. But since women and men often work in different industries, the risks vary according to gender.

Some of the interviewees agree that men are generally more affected by labour exploitation, and note that, according to the statistics, more men than women die on the job.

Yet there are major disparities between different industries, as men and women end up in different sorts of jobs.

Still, the Swedish Gender Equality Agency, for example, has highlighted that women from other countries, are at high risk of exploitation at work and sexual exploitation. [...] And the situation is tougher for women who bear a financial support responsibility (for themselves or their families).

– *Trade union*

If you look at which genders are affected, you see industry-specific patterns. In construction, there are many men who are exploited, while in cleaning there are many women. But I don't have any hard numbers. In general, men are more frequently exposed to labour exploitation. That's also evident in other countries; more men encounter that than women. But you have to keep in mind that it's hard to draw any conclusions without data; lots of people slip through the cracks.

– *Civil society organisation*

As an employer, if I wanted to exploit workers, I don't think gender would play much of a role. It's the individual's level of vulnerability that decides, for example, whether someone who helps me get a work permit then forces me to pay them back part of my wages, and then if I go to the union or the police, I lose my job, and thus my livelihood.

– *Civil society organisation*

## Risks of physical and mental illness can arise

On the next rung of this ladder, deficiencies in the work environment due to work-related crime can result in risks to both physical and mental health. According to the organisations in the study, these risks can give rise to very serious incidents.

### Major shortcomings can lead to major risks

In particular, the trade unions and public authorities, but also individual industry and employers' associations in the study, state that their experience is that an unsatisfactory work environment tied to work-related crime can give rise to numerous risks of physical and mental ill-health:

Time pressure, and thus work-related stress, risks leading to an increased number of personal accidents, and damage to vehicles and equipment.

– *Industry and employers' association*

According to the interviewees, essentially the same types of risks arise in connection with general deficiencies in the work environment, i.e., those that are not necessarily related to work-related crime.

These are exactly the same risks that people always encounter on the job, like that you could die from falling off a roof or become ill from working with allergens without protection and training. Or working with machines without protection.

– *Public authority*

However, some risks are more closely associated with work-related crime, according to the interviews and the documentation that serves as a basis for the study. In terms of physical risks and injuries, we hear about, e.g., fall injuries, puncture wounds, and cuts which, in the worst case, can lead to death. As for mental illness, factors such as stress, fear, exhaustion, and humiliation are described as common. These risks are primarily mentioned by the trade unions and public authorities. When major shortcomings in the work environment exist because the operator deliberately disregards the work environment regulations, the risks can be particularly great. This can lead to very serious incidents.

For an individual, the greatest risk is that they could die on the job. We have no idea how many people actually do. I'm talking about the worst physical risks. Different types of serious accidents, falls, for example injuries to the knee, taking a tumble, the kinds of things that happen in a workplace where there are a lot of risks.

– *Trade union*

It is difficult to know what risks of harm work-related crime causes. But it must be a terrible situation to find yourself in. To be in the country without knowing the language, living in a shack. Above all, it must be mentally stressful. How do you feel when you understand how cheated or exploited you've been?

– *Trade union*

This can change the course of people's lives in a horrible way. You can be involved in accidents, be injured by chemicals, or end up with long-term psychological damage. For example, human trafficking has enormous psychological consequences.

– *Public authority*

## **Workers do not always receive the care they need**

When it comes to injuries due to an unsatisfactory work environment related to work-related crime, the trade unions, public authorities, and civil society organisations all cite examples of the fact that injured workers do not always receive the care they need. This extends even to very serious incidents:

We hear horror examples of people who fall and hurt themselves, who are sent back to their home country, who don't receive care but are just sent back, so that the employer won't face any repercussions.

– *Public authority*

They're funnelled out of the country. I haven't seen it firsthand, but for example, I heard about a final cleaner on a construction site who fell out of a window and broke his back. He was driven directly to the ferry and literally ferried of the country. I've also heard of people whose employer picked them up from the hospital and immediately shipped them off.

– *Civil society organisation*

## **4. The fight against work-related crime entails both routine work and targeted interventions**

This chapter corresponds to the second purpose of the sub-study and describes the interventions that the organisations in the study carry out to prevent and mitigate the occurrence of work-related crime and its consequences for the work environment. However, the chapter starts by briefly describing the systematic efforts to combat work-related crime undertaken by the organisations in the study. The rest of the chapter provides examples of the more specific efforts and working methods for fighting work-related crime employed by these organisations.

### **Systematic efforts to combat work-related crime**

The organisations in the study engage in systematic efforts to combat work-related crime, and in some cases they have done so for quite a long time. This work is conducted at both the strategic and operational level.

#### **Strategic efforts**

Several of the organisations included in the study work strategically to combat work-related crime. Under the leadership of the Swedish Public Employment Service, the Swedish Work Environment Authority, the Swedish Economic Crime Authority, the Swedish Social Insurance Agency, the Swedish Gender Equality Agency, the Swedish Migration Agency, the Swedish National Police Board and the Swedish Tax Agency collaborate on these issues. Within the framework of collaboration between these public authorities, efforts are underway to build structures and fora for national and regional dialogue and collaborative work to eliminate or mitigate work-related crime practices. This also entails building a common knowledge base and methods to counteract cheating, rule violations, and crime in working life. The knowledge base in this area is being developed both through the gathering and sharing of experiences amongst public authorities, municipalities, and other stakeholders within the country, and through international contacts and knowledge exchange. In terms of strategic efforts, skills development interventions have also been carried out by professionals in public authorities and municipalities.

The strategic work also includes both national and regional stakeholders. The latest report from the public authorities that were assigned the joint government mandate (16) notes, for example, that:

A working group for joint methodological support has been formed with the aim of developing the methodology and increasing the effectiveness of joint measures. Collaboration has been developed between national and regional parties and the construction industry. Over this past autumn, collaboration with the cleaning industry also commenced.

Additionally, the civil society organisations in the study are also active at the strategic level in efforts to combat work-related crime, not least through advocacy and by spotlighting the perspectives of the victims of crime.

Among other things, we work to raise awareness about the existence of labour exploitation.

– *Civil society organisation*

## **Operational efforts**

The organisations included in the study also work in numerous ways to combat work-related crime at the operational level. Public authorities, trade unions, industry and employers' associations, and civil society organisations are all involved in this work.

Much of these efforts are conducted within the context of the organisations' regular tasks, not in the form of specific efforts to combat work-related crime. It is rare for such efforts to focus specifically on addressing work environment deficiencies, but sometimes they do. This is particularly true of the work and interventions of the Swedish Work Environment Authority.

The operational efforts of Sweden's public authorities to combat work-related crime are based on the instructions and mandates of each authority and based on the provisions that govern each policy area. Some public authorities describe that they are much more focused on the area of work-related crime and have special units, departments, or processes focused on the issue. Others do not, but see efforts to fight work-related crime as part of their ordinary activities. Several of the public authorities' working methods to combat work-related crime have thus existed since before the concept itself was established and became a priority area within Swedish public administration.

We work with it as part of our usual core activities. Work-related crime and the increased focus on it isn't a game changer for us.

– *Public authority*

The public authorities' operational efforts to combat work-related crime are in part coordinated within the framework of the joint mandate of the authorities and their mission to establish regional centres to combat the problem. These centres work continuously to address the tip-offs they receive and prepare measures to address work-related crime (16):

The centres strive to develop ways to ensure that relevant information is obtained, in order to enable more public authorities than those participating in the physical workplace inspection to receive relevant information that can aid their own work. These public authorities can open their own cases based on the data processed at the centres established to combat work-related crime (p. 6).

In addition to the public authorities' strategic efforts to combat work-related crime, these parties in the study continue to organise employees and employers and get them to sign collective agreements. It appears from the documentation that an important part of the operational efforts to combat work-related crime is part and parcel of the normal work of signing and following up collective agreements:

To join our organisation, you have to have a collective agreement. As a company, that means accepting that both our eyes and those of the union are always on you. If you want to stay under the radar by cheating, you probably won't want to join our organisation. If we come across companies that refuse to follow the membership rules, we kick them out. Many people think that doing that pits us against the unions. But that's not always the case. When it comes to this issue, we often agree.

– *Industry and employers' association*

We conduct internal inspections of the work environment. Union reps and employers go out together to the suppliers who have foreign workers. and do random checks.

– *Industry and employers' association*

The civil society organisations in the study also carry out systematic work in which they identify and provide support to people who are affected by problems such as labour exploitation. They sometimes take over from the public sector, when authorities and municipalities are unable to provide individuals with adequate or appropriate support. They also take on people who are not covered by the Swedish Model through union membership. The civil society organisations describe that they work continuously to inform workers about their rights in the Swedish labour market.

We're part of a group of civil society organisations working to provide support and protection. We're in contact with the Swedish Gender Equality Agency's regional coordinators and the police. They pass cases off to us as needed.

– *Civil society organisation*

It's a crime that threatens society. But we try to start with what happens to people and how we can help more. We work with empowerment, through lectures aimed at vulnerable groups, for example. But also by tracking down and meeting with people who aren't in a union.

– *Civil society organisation*

### **Three types of interventions and working methods to combat work-related crime**

In addition to systematic efforts to combat work-related crime at the strategic and operational level, the organisations in the study undertake more targeted interventions to prevent, reduce, and mitigate its occurrence. In some cases, these interventions are ongoing, while in others they have already – at least partially – been completed. It is not always clear which are still in progress. For example, a public transport information campaign may have ended, but the information is still up on websites.

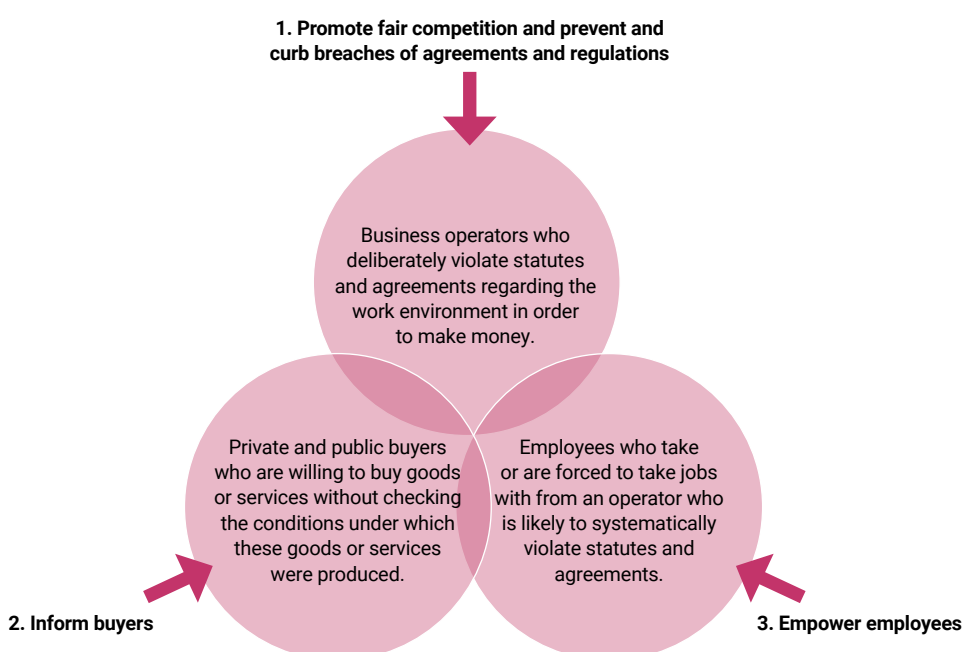
From the interviews and written documentation in the study, it is clear that overall, the organisations included employ three types interventions in their fight against work-related crime. These include interventions that aim to



- promote fair competition and prevent and curb breaches of agreements and regulations
- inform buyers about the importance of not buying goods and services from operators who cheat
- empower employees so that fewer people risk ending up in situations in which they are exposed to operators who may be willing to disregard the regulations.

These interventions focus on the various conditions that together form the breeding ground for work-related crime that gives rise to shortcomings in the work environment (see also Figure 2).

**Figure 2.** Types of targeted interventions against work-related crime.



Targeted interventions to promote healthy competition are implemented by the public authorities, but also by the industry and employers' associations in the study. interventions to inform buyers are implemented by the trade unions, industry and employers' associations, and the public authorities. interventions to empower employees are implemented by trade unions, public authorities and civil society organisations. In the following sections, concrete examples of the three types of intervention are described.

### **Interventions are typically not evaluated**

From the documentation and interviews in the study, it appears that the interventions undertaken by the organisations in the study are generally not evaluated. As will be seen below, certain ones are followed up, but only in exceptional cases is this done in a systematic way. There are several reasons why the interventions have not been evaluated and only followed up to a limited extent. Several have recently started up and are still ongoing, which means that

it is too early to assess their success. In many cases, it is also difficult to evaluate this type of intervention, because access to data is limited. As has previously been mentioned in this report, it is difficult to study work-related crime. But in addition to these explanations, it also appears that interventions of this type are rarely evaluated in a systematic way in Sweden; there is no such tradition here.

A joint follow-up system to track the fight against work-related crime is being developed for use by the involved public authorities. To this end, each one has identified the variables that are relevant to follow up within the context of all the authorities' joint work in the area (16):

The starting point was to base the system on the Swedish National Financial Management Authority's follow-up model, according to which the public authorities must each identify resource, activity, performance and effect variables. All the authorities report monthly to the Swedish Work Environment Authority, which handles the total joint follow-up (p. 10).

Because the interventions have so far rarely been followed up and evaluated in a systematic way, it is impossible to point to specific proven interventions with documented positive effects in terms of reducing work-related crime and improving the work environment. However, it is possible to describe examples of interventions and more limited working methods that are used, and the following section outlines some of those used by the organisations in the study. It also provides a picture of the organisation's own experiences of the intervention, following follow-up or evaluation. However, the reader should be aware that the aim of doing this is not to provide them with a comprehensive overview of all the organisations' contributions to the fight against work-related crime.

## **Interventions to get operators to do the right thing**

The public authorities and industry and employers' associations have undertaken numerous interventions to get the operators to do the right thing, and continue to do so. These include preventive measures and inspections, controls and interventions, for example.

The preventive measures aim to provide support that helps operators to strive for healthy competition. ... This may involve providing them with information, training, and support to facilitate regulatory compliance. Such employer-targeted interventions are also implemented by both public authorities and municipalities, as well as industry and employers' associations.

The more or less clearly defined inspection, control and intervention interventions can lead to administrative or operational measures, but also prosecution. Such interventions are undertaken by the Swedish Police, the Swedish Tax Agency, the Swedish Economic Crime Authority, the Swedish Work Environment Authority, and the municipalities, but also by the parties. Here, it is difficult to draw a clear line between these efforts and the usual work of these organisations. Below are examples of interventions and working methods that the organisations in the study use to get the operators to do the

right thing and promote healthy competition. This is by no means an exhaustive list of targeted interventions in the country.

### **Almega Service Contractors: authorised service companies**

Almega Service Contractors works to authorise service companies. According to their website, (17) they created their authorisation system to strengthen the industry and spotlight respectable companies. Authorised companies are obliged to meet Almega Service Contractors' applicable authorisation criteria. The criteria are established by Almega's Board of Directors and published on Almega Service Contractors' website. Among other things, authorised companies must meet requirements regarding their company form, annual accounts, and F-tax and VAT. There are also requirements related to debts, bankruptcy, the duty to provide information, membership in Almega, legal compliance, and collective agreements, and the authorisation process includes training and introduction. Almega Service Contractors continuously checks the authorised companies, which must apply to renew their authorisation on an annual basis. According to Almega, nearly 180 of the organisation's member companies are authorised, which means that over 28,000 people (annual employees) work in an authorised service company.

### **Almega Service Contractors and Almega Cleaning Contractors: supporting cleaning companies in ensuring healthy work conditions**

Almega Service Contractors and its subsidiary Almega Cleaning Contractors provide various forms of support to their member companies that enable them to develop and charge for their services in a way that creates the conditions for a healthy work environment. The Cleaning Index [*Städindex*] and the Cleaning Hour [*Städtimmen*] are examples of this (18–19):

The Cleaning Index is a type of building cost index. A building cost index is the result of a weighting of the price development of the production factors included in the current business. The basis for the cost budget for the index series is provided by Almega Service Contractors.

The Cleaning Hour is a calculation of the labour cost per hour, based on the collective agreements the organisation makes with its counterparts. The calculations apply to hourly costs relating to the cleaning and service industry, a so-called cleaning hour.

These tools are intended as support materials, and are available on Almega Service Contractors' website.

### **Construction companies and others: The ID06 system**

ID06 was launched in 2006 by the Swedish Construction Federation. The idea behind ID06 is that it should be possible to securely identify the people on a work site and tie each one to a company. The aim is to promote healthy competition and safe workplaces and to combat work-related crime, economic crime, and other forms of crime (20).

ID06 comprises a software system and IT solutions for companies and ties into the legal requirement for electronic staff registers. This requirement means that the companies and people on a work site must be recorded in a staff register. The ID06 system includes the ID06 card, which employees use to register their entry and exit in the work site's electronic staff register.

ID06 is currently owned by ID06 AB. The owners of the company are the Swedish Construction Federation, the Swedish Construction Clients, the Swedish Property Federation, Public Housing Sweden, the Swedish Installation Federation, the Association of Heavy Equipment Contractors, the Confederation of Swedish Enterprises within Sheet Metal and Ventilation, the Swedish Federation of Glazing Contractors, the Swedish Security Industry Association, the Swedish Confederation of Transport Enterprises, and Måleriföretagen.

### **The Swedish Construction Federation: in-person visits to work sites**

During the period January to April 2023, the Swedish Construction Federation conducted 234 workplace inspections on its members' work sites (21). In total, 3 492 companies and 6,702 individuals were inspected. The background this effort is that the organisation wants to prevent decent builders from being put out of business by criminal actors, but they also want to get a picture of the situation regarding work-related crime at their members' construction sites:

Now the Swedish Construction Federation has carried out Sweden's largest inspection of construction sites, by far. We did it to get the facts on the real situation on Sweden's construction sites when it comes to work-related crime. Because to get to grips with the problems, we need to go beyond personal experiences and subjective opinions. We have to know what the current situation actually is. Only then can we produce concrete proposals for action (p. 5).

Among other things, the Swedish Construction Federation found that the majority of all individuals working on the inspected members' construction sites have work permits: 4 0.06 percent of individuals were found to be operating on a construction site without a work permit. Furthermore, the Swedish Construction Federation found that 98 percent of all inspected individuals had a valid ID06 card (6,568 out of 6,702).

The Federation's conclusion is that the overwhelming majority of individuals hold a correctly issued ID06 card and that the system is very well implemented in the construction industry. The investigation discovered no individuals using ID06 cards issued to someone other than the cardholder, nor any cases of counterfeit cards.

### **Rättvist Byggande: The Fair Construction working model**

Rättvist Byggande is an association of developers that provides a working model aimed at preventing and combatting crime and unfair competition in its members' contracting projects (22). The idea of the working method is that developers should collaborate operationally and thus protect each other from risks associated with crime and labour law deficiencies in their construction projects.

The fundamental idea of the model is that the member should be able to feel confident that all companies participating in the member's projects are known and audited.

Among other things, the working model consists of the following:

- Pre-registration of subcontractors: All companies working in a contract project tied to Rättvist Byggande must pre-register with the association one week before work begins. Rättvist Byggande conducts a background check on the subcontractor, following which they are either registered, receive a request for additional information, or are denied registration.
- Work site inspections: Rättvist Byggande then conducts work site inspections with the help of external inspectors, using unannounced spot checks. Among other things, these inspections check that all companies on site are pre-registered and registered. ID06 cards, IDs, work and/or residence permits are checked if necessary (staff from third countries), as are seconded staff (foreign employers), work site enclosures (fences/fences and gates), and labour law contract terms (salary, working hours, and holidays).

In addition to registration and inspection, Rättvist Byggande also provides support materials aimed at preventing cheating and crime from occurring on its members' construction sites. The association also provides support to its members by providing common contract terms and conditions for Fair Construction.

### **The Swedish Association of Road Transport Companies and the Swedish Confederation of Transport Companies: the Fair Transport certification**

According to information on the website (23), Fair Transport is a certification for sustainable transport in the transport sector. The purpose of the certification is to ensure that freight transport by road is carried out safely, climate-smart, and with good conditions for employees. Both the Swedish Association of Road Transport Companies and the Swedish Confederation of Transport Companies are behind the certification system.

It covers several areas, of which the work environment is one. With regard to work environment-related issues, in order to receive the certification, companies are expected to have described a policy to combat victimisation, a work environment policy, their systematic work environment management/crisis management plan, follow-up of their driving, rest times, and compliance with the Road Working Hours Act, and monitoring of speeds.

When a haulage company applies to become Fair Transport-certified, it undergoes a multi-step review process. The company registers various information about its operations, which are then audited by Fair Transport. The audit is carried out by an external party, which checks that the company meets the criteria required to be approved.

## Interventions to inform buyers

Another category of measures involves informing buyers not to buy goods and services from businesses that engage in work-related crime practices. Such interventions have different target groups, among them private consumers, companies, and contracting authorities, regions and municipalities.

Below are examples of interventions and working methods that the organisations in the study use to inform buyers. In addition to these, the previously mentioned Authorised Service Company and Fair Transport certifications can also be considered to fall into this category of intervention. This is because the certifications also aim to inform buyers about which companies promote healthy competition and ensure fair conditions in terms of, e.g., the work environment.

### **Almega Cleaning Contractors, Kommunal, and the Building Maintenance Workers' Union: support materials for the procurement of cleaning services**

Almega Cleaning Contractors, Kommunal, and the Building Maintenance Workers' Union have developed support materials for procurements intended for all public procurers of cleaning services (24). This is thus a joint intervention. Its aim is to make buyers realise the importance of not basing the award of contracts solely on the lowest price, but also setting quality requirements in procurement. This will help ensure a healthy and competitive cleaning services market with fair conditions for employees.

### **The Swedish Work Environment Authority and others: Stop work-related crime**

In 2021, the Swedish Work Environment Authority teamed up with the other public authorities in a joint effort to combat work-related crime through films and images aimed at the general public. The aim was to increase the public's knowledge of the prevalence of work-related crime in Swedish society and to prevent more people from contributing to the problem through their purchasing behaviour. In this context, everyone in Sweden between the ages of 20 and 80 was counted as the general public.

According to the joint report (16) to the Government, the intervention consisted of films and still images presented via social media, on television, and in the cinema (p. 12). The message to the public was that low prices can have a dark side and mean that people are being exploited. Consumers were also informed about how they can help stop work-related crime.

According to the report, in 2022 the public authorities developed new material for the campaign. This material consisted of fake online ads with offers of services at incredibly low prices (e.g., "Wash your car for SEK 29") that were disseminated through various sites. Anyone who immediately clicked on the ad was taken to a webpage on the Swedish Work Environment Authority's website about work-related crime and its consequences. To evoke emotions and create awareness about how people are exploited in workplaces, visitors to the website

could watch portrayals filmed from the perspective of vulnerable workers. The website also had tips for consumers about what they can do to avoid contributing to work-related crime.

According to the joint reporting by the public authorities, this communication intervention was launched in November 2022. The TV portion ended on 18 December 2022, but the intervention continued through the end of the year in the form of screenings in cinemas and posts on social media.

The intervention has been evaluated by the public authorities, and 1,000 people were asked to answer questions via an online survey. According to the authorities' joint reporting, the target group perceives the message as clear, and most people understand it to be that the consumer has a responsibility, that they should their part by choosing a respectable supplier, and that they should request a receipt or refrain from buying from bad actors. Most people also get the message that work-related crime occurs in society. Many people think that the message is clear, and the communication has also reached people who say they are less familiar with the subject.

### **The Swedish Economic Crime Authority: Secure Procurement**

The Swedish Economic Crime Authority provides support to the business community and the public sector in the procurement of respectable and responsible suppliers (25). The purpose is crime prevention. The support materials are compiled on the Authority's website and includes information on how procurers can make secure procurements. Among other things, there is a checklist to determine whether a company is upstanding.

### **The Swedish Hotel and Restaurant Workers' Union: Fair Conditions**

The Hotel and Restaurant Union (HRF) has an information campaign (26) entitled "Fair Conditions" [*Schysta villkor*], through which it informs the public about which companies have collective agreements. The aim is to make it easier for consumers to find these restaurants. The campaign consists of an app and website called *Schysta villkor*. It allows people to search for a company name, company registration number, or city and find companies that have signed a collective agreement with HRF.

### **The Swedish Tax Agency: Request a Receipt**

The Swedish Tax Agency has an information campaign entitled "Request a Receipt" [*Be om kvitto*], which informs the public about the importance of always getting a receipt when you buy something (27). The aim is to raise public awareness that you should not make purchases without a receipt. The target group is consumers in the restaurant industry and the taxi industry, among others. The campaign is currently available on the web in the form of text and films, and was previously published on the Swedish Tax Agency's Facebook page and other communication channels.

## **The Swedish Confederation of Transport Enterprises: Who pays for the free shipping?**

The Swedish Confederation of Transport Enterprises has run an information campaign entitled “Who pays for the free shipping?”, which informs the public about which courier companies have collective agreements. The campaign is aimed at consumers and decision-makers and has been presented through advertisements in the metro with a QR code that directs the user to a campaign page (28), where the information is still available.

The campaign was based on the report “Free shipping threatens both the work environment and the climate” [*Den fria frakten hotar både arbetsmiljö och klimatet*], produced by the Confederation in 2021 (29). The report describes how e-commerce has developed to include offers of free shipping and various delivery options, among other things. Based on interviews with employees in trade, transport, and postal operations tied to e-commerce, the report concludes that the rapid growth of e-commerce has also put great strain on workers.

## **Visita: Member badges**

Visita is the industry and employers’ association for the Swedish hospitality industry, and sends out a membership badge to all members with full membership in the organisation (30). With this badge, Visita certifies that the member conducts a respectable and responsible business, with fair conditions for employees. The purpose is to signal to guests, staff, and other companies in the industry that the employer in question stands behind the industry’s ethical rules and has collective agreements. Members are encouraged to post their Visita badge in a clearly visible place near their entrance.

## **Empowering employees**

A third category of measures aims to empower employees and prevent them from accepting or being forced to take jobs from operators who are willing to systematically violate statutes and agreements regarding the work environment. This category also includes interventions that support victims of labour exploitation. Below are examples of interventions and working methods that the organisations in the study use to empower employees. Examples from public authorities in other countries that participated in the study are also described here.

## **The Norwegian Labour Inspection Authority: Know Your Rights**

The Norwegian Labour Inspection Authority has developed and launched the “Know Your Rights” campaign in bilateral cooperation with work environment authorities in Norway, Estonia, Lithuania, Bulgaria and Romania (31). The campaign is aimed at people who intend to come to Norway and work. The goal is to equip workers to improve their situation in the labour market and, in the long run, to combat work-related crime.



“Know your Rights” consists of two parts: a website and campaigns. The website contains information for foreign workers. It is designed to be understandable, relevant, and easy to use. The information describes both the rights and obligations of employees and covers the rules on pay (including minimum wage), payslips, holidays, overtime, and taxation. In addition to Norwegian, the information is available in English, Bulgarian, Lithuanian, Romanian, Polish, Russian, Ukrainian, and Vietnamese. Campaigns on Facebook and websites relevant to the target audience are also used to promote “Know Your Rights” to its target audience.

The campaign has been evaluated (32), and the conclusion is that it has been successful in achieving its established goals. It has also been cost-effective.

### **The Danish Working Environment Authority: workplacedenmark.dk**

Similarly to the Norwegian Labour Inspection Authority, the Danish Working Environment Authority has published information on its website, workplacedenmark.dk, aimed at people who intend to work in Denmark (33). The aim is for workers to understand their rights when working in the country.

Among other things, the information covers registration in the Register of Foreign Companies (RUT), work environment issues, reporting of occupational injuries, and qualifications. It is provided in English, German, Polish, Italian, Lithuanian, Portuguese, Romanian, Russian, and Spanish.

### **The Salvation Army: Safe Havens Traffickingcenter**

As the name implies, Safe Havens Traffickingcenter offers legal and social support to persons exposed to human trafficking or exploitation (34). The Salvation Army has two such trafficking centres in Sweden. The target group is people exposed to labour exploitation in, e.g., the cleaning, restaurant, construction, and beauty industries. The work is victim-centred and based on the principle that all people have fundamental rights.

In terms of its working method, the Salvation Army collaborates with other stakeholders to offer sheltered housing, the right to reflection time, medical care, or legal assistance. The work is conducted by volunteers and in collaboration with law firms who provide both social support and legal advice. The idea is for the intervention to complement public efforts by, e.g., the social services, when these do not work or fail to reach their intended target group.

### **The Swedish Gender Equality Agency: information in Ukrainian and Russian on the risks of human trafficking**

When Russia attacked Ukraine in 2022, the Swedish Gender Equality Agency produced information in Ukrainian, Russian, and English about the risks of human trafficking (35). The information is aimed at both children and adults and has been disseminated to the target group via social media and through other partner authorities. The information encourages people to consider the

risk of being exploited and be aware of the risks of human trafficking. It also contains phone numbers for actors to which they can turn if they are subjected to pressure or have been threatened.

### **LO: Guide to a law-abiding labour market**

The Swedish Confederation of Trade Unions (LO) has produced a guide to a law-abiding labour market, the *Handbok för ordning och reda på arbetsmarknaden* (36). It is aimed at trade union representatives at all levels. The purpose of the guide is to provide support in the work of monitoring compliance with the regulations of the Swedish labour market. The book describes some of the laws that LO considers to be the most important and illustrates with examples how these laws can be applied in different situations.

## 5. Summary and commentary

This chapter summarises and comments on the main conclusions of the study.

### Summary conclusions

With this study, the goal of the Swedish Agency for Work Environment Expertise has been to get a picture of relevant stakeholders' knowledge of the relationship between work-related crime, the work environment, and employees' health and wellbeing, as well as to gain knowledge about which interventions in the work environment and systematic work environment management measures have been implemented by these stakeholders in an effort to prevent, reduce, or mitigate the occurrence of work-related crime.

#### **There is a lack of consensus regarding the concept of work-related crime**

The study shows that the interviewed organisations have somewhat different views on the concept of work-related crime. The trade unions, public authorities, and civil society organisations use the term work-related crime [*arbetslivskriminalitet*, which has significantly different connotations, in Swedish].

Industry and employers' associations are generally more hesitant to use the term. They feel that the Swedish term *arbetslivskriminalitet* is misleading, and argue that it is confusing to apply it, among other things because some of the practices that fall within the scope of the definition are not actually punishable offences.

#### **The relationship between work-related crime and the work environment is difficult to study**

Public authorities, trade unions, and industry and employers' associations – said it was difficult to say anything with certainty about the relationship between work-related crime and the work environment. The interviewees point out that there is a lack of relevant statistics that would enable the follow-up of work-related crime in several areas. Operators that implement work-related crime often strive to keep their activities hidden and rarely leave any trace in official registers.

#### **Work-related crime is said to lead to shortcomings in the physical, and psychosocial work environment**

While the organisations in the study emphasise that it is difficult to study the connection between work-related crime and the work environment, several of them describe that such a correlation exists. Rather than referring to research or other analyses, the interviewees highlight experiences of having seen and heard about examples of work-related crime that can give rise to an unsatisfactory work environment.

According to the organisations, work-related crime can lead to shortcomings in the physical, and psychosocial work environment. Problems in the physical work environment are easier to detect, e.g., during inspections, but also in the statistics on workplace accidents.

### **The relationship is driven by a desire to make money**

The public authorities and trade unions in the study, are particularly convinced that work environment deficiencies occur in connection with work-related crime, because some operators deliberately violate statutes and agreements regarding the work environment in order to make money. But for this to happen, there must also be workers who accept or are forced to take jobs from an operator that is likely to systematically violate statutes and agreements concerning the work environment. Moreover, it requires that private and public buyers are willing to buy goods or services without checking the working conditions under which these goods or services were produced.

### **Several systemic factors create the conditions for work-related crime that leads to a poor work environment**

Work-related crime that drives shortcomings in the work environment arises in a broader context of systemic factors that affect the problem. The organisations in the study point out that the Swedish Model, in which social partners have a far-reaching responsibility for working conditions and their follow-up, creates risks for non-unionised workers. At the same time, the Swedish Model leaves the public authorities with limited opportunities to control employees' working conditions.

Work-related crime is also fed by globalisation, increased mobility, and migration, as well as specialisation of the labour market and the use of subcontractors at multiple stages in a supply chain.

### **Foreign workers are more frequently affected**

According to the public authorities and civil society organisations in the study, foreign workers are more often affected by an unsatisfactory work environment resulting from work-related crime. This group is more likely to be forced to take work with operators who are willing to cheat. According to some of the interviewees, this is due to the fact that foreign workers are often less educated and thus have a more vulnerable position in the labour market. People with a foreign background can also have come to Sweden via a work permit arranged by their employer, which lands them in a position of dependence on the employer.

### **Major shortcomings can lead to major risks**

On the next rung of this ladder, deficiencies in the work environment due to work-related crime can result in risks to both physical and mental health. According to the organisations in the study, these risks can give rise to very serious incidents. In particular, the trade unions and public authorities, but also individual industry and employers' associations in the study, state that their experience is that an unsatisfactory work environment tied to work-

related crime can give rise to numerous risks of physical and mental ill-health. Examples of serious incidents are reported in which the affected employees do not receive the care they need.

### **Both strategic and operational efforts to combat work-related crime are underway**

The organisations in the study are conducting both strategic and operational efforts to combat work-related crime. Within the framework of collaboration between these public authorities, strategic efforts are underway to build structures and fora for national and regional dialogue and collaborative work to eliminate or mitigate work-related crime practices. This also entails building a common knowledge base and methods to counteract cheating, rule violations, and crime in working life. The strategic work includes both national and regional stakeholders. The organisations included in the study also work in numerous ways to combat work-related crime at the operational level. Public authorities, trade unions, industry and employers' associations, and civil society organisations are all involved in this work. Much of these efforts are conducted within the context of the organisations' regular tasks, not in the form of specific efforts to combat work-related crime.

### **Three types of targeted interventions against work-related crime**

In addition to systematic efforts to combat work-related crime at the strategic and operational level, the organisations in the study undertake more targeted interventions to prevent, reduce, and mitigate its occurrence. These include interventions to promote healthy competition and prevent and curb breaches of contracts and regulations, as well as interventions to inform buyers about the importance of not buying goods and services from operators who cheat. Still other interventions aim to empower employees, so that fewer people risk ending up in situations in which they are exposed to operators who may be willing to disregard the regulations.

### **As a rule, the interventions are not evaluated**

The targeted interventions to combat work-related crime implemented by the organisations in the study are not usually evaluated. There are several reasons why the interventions have not been evaluated and only followed up to a limited extent. Several have recently started up and are still ongoing, which means that it is too early to assess their success. In many cases, it is also difficult to evaluate this type of intervention, because access to data is limited. But it also appears that there is no tradition in Sweden of systematically evaluating this type of intervention. Consequentially, it is difficult to identify successful efforts and interventions to combat work-related crime, for the benefit of the work environment.

## Commentary on the results

From the interviews with the organisations included in the study, it is clear that major deficiencies in the work environment can arise in connection with work-related crime. It emerges that there is a parallel, “shadow” work environment in Sweden, which some employees endure conditions that the vast majority of people would find unthinkable.

For several reasons, it seems that it will be important to continue to explore how work-related crime affects employees’ work environment. First of all, the study indicates that the concept of work-related crime [specifically, the Swedish term *arbetslivskriminalitet*] is not uniformly supported by stakeholders, which creates confusion and can hinder effective joint action. Some industry and employers’ associations question the use of the term *arbetslivskriminalitet*, and underscore the need for a uniform definition and broadly based understanding.

Another key conclusion is that there is a significant lack of empirical analyses of the relationship between work-related crime and the work environment. This makes it difficult to fully comprehend the consequences of work-related crime on workers’ health and wellbeing. There are difficulties in studying shady activities. However, the experiences described in this study indicate that work-related crime through which operators significantly endanger the work environment can lead to serious physical and psychological injuries and sometimes even death.

Another important aspect to consider is the fact that an unsatisfactory work environment tied to work-related crime will look different for different groups of workers. In particular, people with a foreign background and those who lack union support are at a greater risk of being negatively affected by work-related crime. This underscores the need for targeted interventions and safety nets for these groups. The risk is that some individuals end up outside the Swedish Model, where working conditions are largely controlled by the social partners and the authorities have limited capabilities to address unsatisfactory work environments. In Sweden, the Swedish Work Environment Authority can only exercise supervision regarding violations of the Work Environment and Working Hours Act, not breaches of collective agreements.

In conclusion, the study demonstrates that unions, industry and employers’ associations, public authorities, and civil society organisations are already striving to combat work-related crime. However, it also shows that the interventions are rarely evaluated or followed up in a systematic way. To build knowledge about which interventions are effective, dialogue with the social partners, public authorities, and civil society organisations engaged in the fight against work-related crime may be necessary.

## 6. References

1. The Government's official letter 2020/21:92: A Good Work Environment for the Future – the Government's Work Environment Strategy for 2021–2025.
2. Government Decision A20127/02422.
3. Government Decision A2017/00678.
4. Government Decision A2021/00085.
5. Government Decision A2022/00333.
6. The Swedish Work Environment Authority (2023). Center mot arbetslivskriminalitet startar i Norrköping. (<https://www.av.se/nyheter/2023/center-mot-arbetslivskriminalitet-startar-i-norrkoping/>) Retrieved 09-27-2023.
7. En nationell delegation mot arbetslivskriminalitet (Dir. 2021:74).
8. SOU 2022:36 Arbetslivskriminalitet – en definition, en inledande bedömning av omfattningen, lärdomar från Norge.
9. SOU 2023:8: Arbetslivskriminalitet – arbetet i Sverige, en bedömning av omfattningen, lärdomar från Danmark och Finland (SOU 2023:8).
10. Government Decision A2022/00996.
11. Esaiasson, P. et. al (2017). Metodpraktikan: konsten att studera samhälle, individ och marknad.
12. Confederation of Swedish Enterprise (2023). Arbetsmarknadskriminalitet – hur påverkas företagen och vad behöver göras?
13. Swedish Confederation of Trade Unions, LO (2022). Arbetslivskriminalitet – kampen för ordning och reda.
14. The Rescue Mission (2023). Exploatering av arbetskraft i Sverige.
15. The Swedish Work Environment Authority et. al (2021). Lägesbild 2021. För det myndighetsgemensamma arbetet mot fusk, regelöverträdelser och brottslighet i arbetslivet.
16. The Swedish Work Environment Authority et. al (2023). Redovisning av uppdraget att inrätta regionala center mot arbetslivskriminalitet och om varaktig myndighetssamverkan.
17. Almega Service Contractors (2023). Vad krävs av ett Auktoriserat Serviceföretag? (<https://www.serviceforetagen.se/auktorisering/auktorisationskriterier/>). Retrieved 10-10-2023.
18. Serviceföretagen (2023). Städtimmen. (<https://www.serviceforetagen.se/stadtimmen/>) Retrieved 10-10-2023; Serviceföretagen (2023).
19. Städindex. (<https://www.serviceforetagen.se/branscher/stadforetagen/stadindex/>). Retrieved 10-10-2023.
20. ID06 (2023). Om ID06. (<https://id06.se/om-oss/>) Retrieved 10-10-2023.
21. Byggföretagen (2023). Arbetsplatskontroller. Byggföretagens undersökning av byggarbetsplatser 2023.
22. Rättvist byggande (2023). Arbetsmodellen Rättvist byggande. <https://www.rattvistbyggande.se/rattvist-byggande-i-praktiken/arbetsmodellen-rattvist-byggande>. Retrieved 11-26-2023.
23. Fair Transport (2023). Granskning och certifiering. (<https://fairtransport.se/om-fair-transport/kontroll-och-certifiering/>.) Retrieved 10-10-2023.
24. Almega Cleaning Contractors, Kommunal, and the Building Maintenance Workers' Union (2018). Upphandling av städtjänster. Version 18-05-18.

25. Swedish Economic Crime Authority (2023). (Upphandla säkert. <https://www.ekobrottsmyndigheten.se/om-ekobrott/bf/upphandla-sakert/>). Retrieved 10-11-2023.
26. Swedish Hotel and Restaurant Workers' Union (2023). Schysta villkor. (<https://www.hrf.net/om-hrf/schysta-villkor/>). Retrieved 10-10-2023.
27. Swedish Tax Agency (2023). Be om kvitto. (<https://skatteverket.se/privat/skatter/arbeteochinkomst/beomkvitto.4.70ac421612e2a997f85800018280.html>). Retrieved 10-10-2023.
28. Swedish Confederation of Transport Enterprises (2023). Vem betalar för den fria frakten? (<https://kampanj.transport.se/fri-frakt#end>). Retrieved 11-16-2023.
29. Swedish Confederation of Transport Enterprises, the Swedish Union for Service and Communications Employees, and the Swedish Commercial Employees' Union (2021). Fri frakt till ett högt pris. An analysis of the development and sustainability of e-commerce.
30. Visita (2023). New Visitamärket 2020. (<https://visita.se/nyhet/nytt-visitamarke-2020/>). Retrieved 10-11-2023.
31. The Norwegian Labour Inspection Authority (2023). Working in Norway: Your rights and obligations. (<https://www.arbeidstilsynet.no/en/knowyourrights/>). Retrieved 10-11-2023.
32. Samfunnsøkonomisk analyse AS (2021). Evaluation of the campaign "Know Your Rights". Report 27-2021.
33. Work place Denmark (2023). (<https://workplacedenmark.dk/>). Retrieved 10-11-2023.
34. The Salvation Army (2023). Safe Havens traffickingcenter. (<https://www.fralsningsarmen.se/safe-havens/>). Retrieved 10-11-2023.
35. Swedish Gender Equality Agency (2022). Personer på flykt från Ukraina ska veta hur de undviker människohandel. (<https://jamstalldhetsmyndigheten.se/aktuellt/nyheter/personer-pa-flykt-fran-ukraina-ska-veta-hur-de-undviker-manniskohandel/>). Retrieved 10-11-2023.
36. Swedish Confederation of Trade Unions, LO (2012). Handbok för ordning och reda på arbetsmarknaden.



# 7. Appendix 1.

## The organisations in the study

### Swedish public authorities

The Swedish Work Environment Authority (two interviews, one of which focuses on the joint government mandate and one with a focus on the work of building up the centres to combat work-related crime)

The Delegation Against Work-related Crime

The Swedish Public Employment

Service The Swedish Economic Crime

Authority The Swedish Social Insurance

Agency The Swedish Gender Equality

Agency The Swedish Migration Agency

The Swedish Police

Authority The Swedish

Tax Agency The Swedish

Prosecution Authority

### Nordic public authorities

The Danish Working

Environment Authority

The Norwegian Labour

Inspection Authority

### Trade unions, employer organisations, and trade associations

Almega

The Swedish Construction Federation

The Swedish Electricians' Union

The Building Maintenance Workers' Union

The Swedish Federation of Green Employers

The Swedish Hotel and Restaurant Workers' Union Kommunal

The Swedish Confederation of Trade Unions (LO)

The Confederation of Swedish Enterprise

The Swedish Association of Road Transport Companies

The Swedish Transport Workers' Union The Swedish Confederation of  
Transport Companies

Visita

### Civil society organisations

The Salvation Army

The Swedish Platform Civil Society against Human  
Trafficking

Rättvist Byggande

## 8. Appendix 2. Interview guide

### Background

- What functions do you have in your organisation in terms of work-related crime and the work environment?
- How do you (in your organisation) define the concept of work-related crime? What do you consider the term to mean?
- In what way does your organisation work with issues regarding work-related crime related to the work environment? E.g.: How do you monitor the issue? How do you develop knowledge?
- Do you collaborate with other stakeholders in this area? How so?
- Are you planning, implementing, or have you conducted interventions aimed at preventing and reducing work-related crime? (If yes, in-depth questions are asked about it.)

### The relationship between work-related crime, the work environment, and employees' health and wellbeing

- Is it your organisation's view that there is a correlation between work-related crime and employees' work environment? If so, what does that connection look like, in your experience? On what do you base that assessment?
- What connections do you see between work-related crime and the physical, and psychosocial work environment? On what do you base that assessment?
- Is it your organisation's view that the relationship between work-related crime and the work environment varies between industries? If so, how? Are any industries more affected? Why?
- Is it your organisation's view that the correlation between work-related crime and the work environment is different for women and men in the labour market? Does gender play a role in this relationship? If so, how?
- Is it your organisation's view that the relationship between work-related crime and the work environment is different for older/younger workers?
- Is it your organisation's view that the relationship between work-related crime and the work environment is different for Swedish-born and foreign workers?

## The relationship between work-related crime and employees' health/wellbeing

- How does your organisation view the risks of work-related crime for the health and wellbeing of employees? What do you consider to be the most prevalent risks?
- What is your view of the connection between the occurrence of undeclared on the one hand and more serious incidents and accidents at work on the other?
- Is it your organisation's view that the risks work-related crime pose to employees' health and wellbeing vary between industries?
- Is it your organisation's view that the risks work-related crime pose to employees' health and wellbeing are different for women and men?

## Interventions to combat work-related crime

- Have you conducted interventions to prevent and reduce or mitigate the occurrence of work-related crime? What was the purpose of the intervention, its target group (industry), hit rate, content, and time period?
- Have you followed up on the effects of the intervention? If yes, how have the effects been followed up? How have you documented the effects (ask for the documentation)?
- What effects have you noted? Do the effects vary amongst different groups of workers – for example, between women and men?
- If effects have occurred: Why have the effects occurred?



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