



► National Action Plans on Forced Labour

May 2025

This brief is part of a series on **Promising practices in addressing forced labour**, which presents various practices related to the provisions of the ILO instruments adopted in 2014 to complement the [Forced Labour Convention \(C29\)](#) adopted in 1930, namely the [Forced Labour Protocol \(P29\)](#) and [Recommendation \(R203\)](#). Specifically, this brief focuses on National Action Plans on forced labour, drawing insights from the comments made by the ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR).

Key provisions on National Action Plans on forced labour

- Countries shall develop a national policy and plan of action for the effective and sustained suppression of forced or compulsory labour in consultation with employers' and workers' organizations, which shall involve systematic action by the competent authorities and, as appropriate, in coordination with employers' and workers' organizations, as well as with other groups concerned (P29, Art 1(2)).
- Members should establish or strengthen, as necessary, in consultation with employers' and workers' organizations as well as other groups concerned: national policies and plans of action with **time-bound measures** using a **gender- and child-sensitive approach** to achieve the effective and sustained suppression of forced or compulsory labour in all its forms through **prevention, protection and access to remedies**, such as compensation of victims, and the sanctioning of perpetrators (C29, Art1 (1) and R203, Art 1(a)) .

National Action Plans (NAPs) are useful and powerful policy tools that can bring together all relevant stakeholders towards a common objective of eradicating forced labour.

A NAP will help countries address forced labour by:

- providing a framework for coherent and coordinated action
- building national commitment
- setting clear, specific targets to guide action
- providing a mechanism of governance by monitoring progress and holding stakeholders accountable
- addressing root causes and linkages with fundamental principles and rights at work

It is important that NAPs are underpinned by a thorough understanding of the local characteristics of forced labour and possible links with trafficking in persons so as to offer targeted responses that fit the local / national context. NAPs should be developed through broad-based consultations with tripartite plus constituents and with clarity on roles and responsibilities. Sufficient funding to implement planned actions, along with progress monitoring based on clear targets and indicators, will contribute to feasible action.

Further guidance on how to develop, implement and monitor NAPS can be found in the [ILO Toolkit on Developing National Action Plans on Forced Labour](#).

Learning from the previous NAP to inform the design of the new NAP

In **Peru**, a range of national stakeholders developed the 3rd National Plan to Combat Forced Labour (2019-2022) (PNLCTF). This plan drew learning from the evaluation of the previous plan. The evaluation process of the previous plan was participatory, involving about 35 members of the [National Committee for the Fight against Forced Labour](#) from national and regional governments, trade unions, employers' organisations, and civil society organisations from around the country. The participation of so many key actors in the evaluation of the previous plan and the development of the new one contributed to make the new one more relevant and ensure ownership and commitment to its implementation.

The plan aimed (i) to develop an adequate capacity of government institutions to prevent and eliminate forced labour, with specific actions aimed at preventing and detecting forced labour cases, providing assistance to victims of trafficking, sanctioning perpetrators and restoring victims' rights; and (ii) to reduce public tolerance towards forced labour through capacity-building and awareness-raising activities, in particular among civil servants. The plan included sectoral and local considerations, along with attention to gender, disability, and children and youth amongst others, and a monitoring and evaluation framework (with annual evaluation reports). Importantly, lead agencies responsible for implementation were tasked with ensuring that planned activities and their costing were included in their institutional operating plans and budgets (implying the need for a budgetary goal on forced labour within implementing agencies).

- Involving a wide range of stakeholders in the design and evaluation process
- Attention to specific vulnerable groups
- Including costing in the institutional budgets

Resources

- [Plan Nacional](#), Peru
- CEACR [Direct Request](#) (2020), Peru
- CEACR [Observation](#) (2020), Peru

Ensuring consultation throughout the development process of the NAP

Malaysia developed two complementary and interlinked NAPs, one on Forced Labour (2021-2025), and one on Trafficking in Persons (2021-2025).

The NAP on Forced Labour was developed through a two-year consultation process undertaken by the Ministry of Human Resources, in close collaboration with the Malaysian Employers Federation, the Malaysian Trade Union Congress and the ILO. Consultations were held in Peninsular Malaysia, Sabah and Sarawak, with governments, workers, employers, civil society, academia and young people. This process created ownership for implementation.

The NAP recognizes the specific vulnerability of migrant workers to forced labour. They are primarily employed in low-skilled and labour-intensive jobs in sectors such as construction, domestic work, agriculture and manufacturing, often in isolated workplaces. In response, the NAP lists four strategic goals, namely: 1) awareness-raising; 2) legal compliance and enforcement; 3) labour migration management; and 4) access to remedy, support and protection services. Targeted actions include: improving recruitment systems and practices for migrant workers; strengthening capacity of law enforcement officials for migration management and prevention of forced labour, including training of labour inspectors on forced labour; raising awareness of migrant workers regarding legal migration pathways, workplace rights and entitlements, having key relevant legislation relating to forced labour and trafficking in persons, in their own languages; and, providing victims of forced labour with improved access to remedy, support and protective services. While workers are the primary beneficiaries, the NAP makes clear that enterprises should also gain as more sustainable and human rights-centred business practices strengthen their global competitiveness.

- Thorough 2-year consultation process with tripartite+ stakeholders
- Complementary plans on forced labour and trafficking in persons
- Highlights the benefits to workers and enterprises

Resources

- CEACR, [Observation](#) (2022), Malaysia
- Malaysia's [National Action Plan on Forced Labour \(2021-2025\)](#)

Complementary NAPs on forced labour and trafficking in persons

In 2017, in **Germany**, the Federal Government in collaboration with regional authorities (i.e. Länder Working Group on Trafficking in Persons for the Purpose of Labour Exploitation) developed a joint strategy to combat trafficking in persons for the purpose of labour exploitation. The strategy revolved around six objectives: 1) expanding prevention, 2) improving the capacity of authorities and identification of affected persons, 3) expanding advisory and support structures, 4) strengthening law enforcement, 5) improving the data situation, and 6) creating public awareness. To implement the strategy, the Federal Ministry of Labour and Social Affairs (BMAS) established a Service Unit against Labour Exploitation, Forced Labour and Trafficking in Persons.

Subsequently, the Federal Government took the lead in 2023 to develop two national action plans; one against labour exploitation and forced labour, the other against trafficking in persons including for sexual exploitation. The plan against forced labour was initiated by the BMAS and is envisaged to be adopted in the spring of 2025¹, while the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMFSFJ) published a [discussion paper](#) containing proposals for a NAP against trafficking in persons to gather inputs from the social partners and civil society groups. This latter plan was adopted in December 2024². The two plans are envisaged to be complementary in nature: The plan against forced labour will primarily focus on improving prevention of forced labour in the labour market with attention to the role of recruitment agencies, while the NAP against trafficking in persons focuses on strengthening criminal prosecution and protection of

victims of all forms of exploitation, including sexual exploitation.

- Comprehensive and complementary strategies on forced labour and trafficking in persons
- Forced labour addressed primarily through preventive approach targeting labour market
- Involvement of regional authorities in the development and implementation of the NAPs

Resources

- CEACR, [Direct Request](#) (2023), Germany
- [National action plan for the prevention and combat of trafficking in persons](#)



[Rizalina Miranda](#), domestic worker and pianist that took part in an awareness raising campaign on forced labour by the NGO Project Liber8. Malaysia, 2019. © Project Liber8 / ILO

¹ See: www.bmas.de/DE/Service/Presse/Meldungen/2023/mehr-schutz-fuer-arbeitskraefte-in-deutschland.html

² See: www.bmi.bund.de/SharedDocs/pressemitteilungen/DE/2024/12/menschenhandel.html

Addressing work-related crimes

In 2016, **Norway** adopted a Plan of Action against Trafficking in Persons. This plan revolved around (i) strengthened and targeted action against trafficking in persons; (ii) coordinated and effective measures to protect and promote victims' rights; (iii) improved police organization and efforts; (iv) increased knowledge on how to detect and prevent trafficking; and (v) and strengthened international cooperation against trafficking.

In addition, a strategy to combat work-related crime was adopted in 2017. This strategy recognized that work-related crime is complex and comprises many types of violations, including activities that breach laws concerning pay and working conditions, social security and taxation, and further that trafficking leading to forced labour is the most serious crime, while undeclared work is the predominant form of work-related crime.

Subsequently, Norway adopted an Action Plan to Combat Social Dumping and Work-Related Crime in 2022. The Action Plan aims at preventing the exploitation of workers, including by reinforcing assistance to victims of trafficking and forced labour and strengthening labour inspection capabilities. Given their vulnerabilities, specific attention was given to migrant workers³.

Eight regional inter-agency centres against work-related crime (A-Krim centres) consisting of representatives of the police, the Norwegian Tax Administration, the Norwegian Labour and Welfare Administration (NAV), the Norwegian Labour Inspection Authority (NLA), and the Norwegian Customs Service were established to ensure cooperation of the public authorities in preventing and combating criminal activities at work, including the use of forced labour.

Importantly, the National Co-ordinating Unit for Victims of Trafficking (KOM) – which was established in 2011 – is mandated to improve coordination between the authorities and NGOs, provide cross-disciplinary exchange of knowledge and information, build capacity and assist stakeholders in the

implementation of planned actions. The KOM prepares annual reports, covering progress made in addressing trafficking in persons including for labour exploitation, and informing of the challenges faced by the authorities and aid organizations.

- Based on learning from implementation, forced labour is also addressed in the context of social dumping and work-related crime
- Involvement of 8 regional inter-agency centres in the development and implementation of the national plans
- Specific attention to migrant workers

Resources

- CEACR [Direct Request](#) (2023), Norway

Extensive participatory process involving civil society and victims

In 2019, **Ecuador** adopted a long-term Plan of Action against trafficking in persons (2019 – 2030). The plan was drawn up through an extensive participatory process with institutional actors and contributions from civil society, including family members of victims. The Plan contains four components: (i) promotion of rights and prevention of trafficking; (ii) provision of care for trafficking victims, and full promotion and restoration of their rights; (iii) investigation and prosecution of the crime of trafficking in persons; and (iv) governance.

The Plan identifies targets for each component in terms of results and indicators, whose strategic management is the responsibility of the Interinstitutional Coordinating Committee for the Prevention of Trafficking in Persons and Illicit Trafficking of Migrants and for the Protection of Victims.

The prevention and protection components of the plan are implemented at the central level, whereas its investigation and governance components are decentralized to inter-institutional committees at the provincial and cantonal levels.

³ See Norway's response and inputs of June 2024 to GRETA/Council of Europe's third evaluation round at: <https://rm.coe.int/report-submitted-by-the-norwegian-authorities-on-measures-taken-to-com/1680b086f0>.

The Plan also include localized responses which directs populations in situations of human mobility towards social and legal services through the “host town” (Human Mobility Act of 2019). In 2021, this project operated in 14 locations⁴ and focused on the protection of children who are victims of violence, trafficking or exploitation.

Importantly, the Plan provides culturally relevant prevention and protection measures that cater for the specific needs of victims from diverse cultural contexts. Furthermore, it includes specific attention to the elimination of child labour, hazardous work and begging, and the situation of girls, boys and young persons on the streets. This specific focus was reinforced through the Inter-institutional Decision No.003 (2020) which adopted the protocol of actions to provide full care and protection for trafficking victims and which incorporated a specific procedure for girls, boys and young persons.

- Broad-based consultation process involving family members of victims
- Prevention and protection modalities implemented centrally
- Investigation and governance through decentralized institutional committees
- Culturally sensitive responses and targeted assistance tailored to specific needs of girls, boys and adolescents

Resources

- [National Action Plan against Trafficking in persons in Ecuador 2019-2030](#)
- CEACR, [Direct Request](#) (2021), worst forms of child labour
- CEACR, [Direct Request](#) (2022) forced labour
- CEACR, [Observation](#) (2021), worst forms of child labour

Decentralized implementation

In July 2017, **Malawi** adopted its first National Plan of Action Against Trafficking in Persons for the period 2017-2022. The NAP revolved around five priorities:

(i) prevention; (ii) support and protection of victims; (iii) detection, investigation, and prosecution of trafficking offences; (iv) partnership, coordination and sustainable financing; and (v) research, monitoring and evaluation, and reporting. The NAP set out an institutional framework for its implementation, with overall coordination of the plan by the Ministry of Home Affairs and Internal Security and with the involvement of relevant ministries. Importantly, the plan included a decentralized implementation machinery that included district councils, area development committees and village development committees. Furthermore, the plan featured a results framework with specific outcomes and indicators.

Learning from challenges, as faced during the implementation of the first NAP, informed the design of the second NAP against trafficking in persons for the period 2023-2028, which features a more manageable results and monitoring framework, and more clearly spelled out financial means.

- National coordination along with a decentralized implementation machinery
- Learning from an earlier plan led to a more manageable results and monitoring framework, and more clearly spelled out financial means in the subsequent plan

Resources

- CEACR, [Direct Request](#) (2023), Malawi
- [First national plan of action against trafficking in persons 2017-2022](#)
- [Second national action plan against trafficking in persons 2023-2028](#)

Policy informed by data analysis

Malta launched its National Strategy and Action Plan on Combatting Trafficking in Human Beings (2024 – 2030) through its Human Rights Directorate (HRD) in August 2024. It includes specific objectives and expected outcomes: 1) Strengthening the supporting

⁴ See: CEACR [Observation](#) (2021) on the Worst forms of child labour Convention (No.182), Ecuador.

anti-trafficking framework; 2) Ensuring targeted prevention and early identification of potential victims and persons at risk; 3) Increasing reporting by victims, effective investigation and prosecution of traffickers through a victim-centred approach; 4) Comprehensive victim protection, justice and remedies; and 5) Strategic partnerships at regional and international levels to tackle trafficking in persons.

The foundation strategy is based on research findings regarding trafficking patterns and national responses, a SWOT-analysis⁵, a gap analysis and perspectives of victims of trafficking regarding their experiences during the identification process and of services received in Malta.

Thorough analysis of victims and vulnerability profiles resulted in the formulation of cross-sectoral policy priorities pertaining to poverty, discrimination, and early school leave and the related risk of trafficking in persons.

Special attention is furthermore placed on supporting the Agency for the Welfare of Asylum Seekers (AWAS) in systematic and appropriate risk assessments of vulnerabilities of unaccompanied and separated children and ensuring access to accommodation that is safe, child-friendly and with services that respond to their needs.

Specific actions against trafficking in persons in Malta include those by governmental and non-governmental actors under the National Referral Mechanism (NRM) which has been in operation since 2014. The NRM draws from a list of national indicators for identifying victims and follows standard operating procedures which provide detailed information on the steps to be taken from the identification stage (by the police) through to assisted voluntary return of victims.

Planned initiatives were developed through a multi-agency approach which was adopted by the Anti-

Trafficking Inter-Ministerial Committee (IMC). The IMC includes focal points from each Ministry in order to identify and implement measurable actions within their respective purviews, and facilitates inter-ministerial coordination, reporting and monitoring.

Progress under the strategy and action plan will be tracked through annual reports that serve as progressive baselines, along with a mid-term and final evaluation.

- Thorough data-based analysis – including perspectives by victims - informed policy priorities
- Special attention to unaccompanied and separated children among asylum seekers
- Annual reports serve as progressive baselines

Resources

- [National Strategy and Action Plan on Combatting Trafficking in Human Beings in Malta \(2024-2030\)](#)
- CEACR, [Direct Request](#) (2024), Malta



Labour inspector informing workers about their rights, Peru. 2015 © ILO

⁵ SWOT analysis stands for analysis of (internal) strengths and weaknesses, and (external) opportunities and threats.

► Overall reflections

- The development of NAPs against trafficking in persons and/or forced labour - and their implementation, monitoring and evaluation – should involve relevant stakeholders, social partners and other stakeholders such as non-governmental organizations, victims’ and vulnerable groups’ representatives and academics. Respective roles must be clearly identified and divided among collaborating partners. Such involvement of a range of actors creates broad-based ownership and support for implementation and contributes to achieving impact.
- A comprehensive NAP strategy should include attention to 4 ‘P’s - prevention, protection of victims, prosecution of perpetrators and partnerships.
- Learning from previous plans should feed into current plans. They should have manageable monitoring frameworks that allow for progress reporting and adjustments in strategy where necessary.
- Importantly, any actors tasked with implementation should have access to sufficient financial means.
- Implemented action plans gain credibility through recorded proof of impact, including records on the number of actors that commit to forced labour free workplaces; the number of identified and assisted victims; the number of prosecutions and convictions; and the amount of compensation paid to victims.
- Further inspiration may be drawn from the [ILO toolkit on the development of NAPs against forced labour](#).

► Background to the series of briefs on ‘promising practices against forced labour’:

- Under the Forced Labour Convention, 1930 (No. 29), ratifying countries must suppress the use of forced labour (Art. 1), make it punishable as a criminal offense, and ensure that penalties prescribed by law are adequate and strictly enforced (Art. 25).
- The Protocol of 2014 to the Forced Labour Convention (P29) reaffirms these obligations and requests ratifying member States to take effective measures to prevent forced labour, protect victims and ensure their access to justice. These are supplemented by detailed guidance in the accompanying Forced Labour Recommendation, 2014 (No. 203).
- The ILO Committee of Experts on the Application of Conventions and Recommendations (CEACR) regularly monitors how ratifying member States implement their obligations. The outcomes of this periodic review are featured as observations and direct requests, which are [publicly available](#).
- In the course of its review, the CEACR has welcomed several noteworthy measures taken by member States under specific provisions of the Forced Labour Protocol. A selection of these measures has been compiled in this series of briefs.
- Under the [ILO Declaration on Fundamental Principles and Rights at Work \(1998\)](#), all ILO member States, must promote, respect and realize the elimination of forced labour in all its forms, whether they have ratified the relevant international labour standards or not.



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