



Study visit of the European Platform tackling undeclared work: Norway's Joint Operation Group between public agencies: a long-standing model of interinstitutional cooperation in tackling undeclared work

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EXECUTIVE SUMMARY

The study visit hosted by the Labour Inspection Authority of the Kingdom of Norway provided the members and observers of the European Platform tackling undeclared work with the opportunity to explore the Inspectorate's approaches and operational practices used for tackling undeclared work. The goal was to gain a comprehensive understanding of the Norwegian practice and foster a cooperative and mutually beneficial learning environment for all attendees. The study visit provided information that could facilitate transferring the Norwegian practices to other settings. It brought together 46 participants, including representatives of labour inspectorates, tax and social security institutions from 22 Member States. Norway was represented by members from the Tax Administration, Public Roads Administration, Oslo Police, Labour and Welfare Administration (NAV), the National Multi-agency Centre for Analysis and Intelligence, and the Labour Inspection Authority. Additionally, representatives from the European Labour Authority (ELA) were present. The event also marked Norway's full participation in the ELA's activities that become formally possible from mid-2025.

Introduction to the theme of the study visit



The main objective of the study visit was to gain a thorough understanding of Norway's collaborative approach to addressing undeclared work, specifically through its joint work-related crime centres. These structures demonstrate the effectiveness of coordinated efforts across various institutions in responding to complex labour market challenges. In order to fully understand the success of this collaborative approach, the significance of analytical tools, organizational structures, and coordination mechanisms that support Norway's multi-agency response were emphasized and presented in detail. This provided a comprehensive overview of a functional model that can serve as a valuable example for similar practices across Europe. This model can be applied not only at the national level, but also for cross-border cooperation.

Organisation of the Norwegian Labour Inspection Authority

The strategy of the **Norwegian Labour Inspection Authority** (NLI) combines targeted inspections, strong enforcement powers, and inter-agency cooperation to address both traditional and emerging challenges in the labour market, with a special emphasis on vulnerable sectors and workers.



The Norwegian Labour Inspection Authority (NLI) operates under the Ministry of Labour and Social Inclusion and **employs 750 people**, divided in two inspection departments: the Inspection Department and the Department for Combating Work-Related Crime. The NLI carries out approximately **15,000 inspections annually**, with each inspector performing around 70 inspections per year.

The Norwegian Labour Inspection Authority (NLI) operates with three main goals in mind. The first goal is to prevent work-related accidents, musculoskeletal and psychological strain, and exposure to carcinogenic chemicals. The second goal is to ensure that employers provide vulnerable workers with legal pay and working conditions, and that clients and consumers require and verify compliance with labour standards when purchasing services. The third goal is to detect and prevent work-related crime by reducing the capacity and intent of key threat actors and ensuring that foreign workers can safeguard their rights.

Regulation on the sharing of confidential information in the inter-agency cooperation against work related crime

Representatives from the Norwegian Labour Inspection Authority provided a comprehensive overview of the **national legal framework**, focusing on the regulation governing the sharing of confidential information within Norway's inter-agency cooperation against work-related crime.

There are **eight joint work-related crime centres**, each staffed by four agencies: the **Labour Inspection Authority**, the **Tax Administration**, the **Welfare Administration**, and the **Norwegian Police**. These centres operate under a joint management model that provides an organizational framework for inter-agency collaboration. However, the centres are not considered separate legal entities.

The lack of legal provision on inter-institutional data exchange at the beginning of the collaboration in 2015 resulted in challenges for sharing information between government agencies, including difficulties in accessing necessary information and delays in communication. This issue was addressed in 2021 when the Ministry of Justice proposed new regulations to prevent social dumping and work-related crime. The regulations, which came into effect in June 2022, aim to streamline the sharing of confidential information between agencies while also protecting personal data. However, they do not address the procedures for intelligence gathering, inspection methods, or sanctions for non-compliance.

The primary pain point addressed was that the NLI lacks easy access to the registration database of the 80,000 posted workers in Norway. The Norwegian Tax Administration manages this register, and employers must notify them when sending workers to Norway. Addressing this challenge will require a regulatory change. In the meantime, the NLI relies on cooperation with the Tax Administration to obtain the necessary data.

Established cooperation between public agencies at national and international level

Representatives from the NLI and its partner organisations shared their insights and practical experiences with leveraging inter-agency collaboration, prioritizing across group missions, and analysing threat actors.

The participants had the opportunity to delve **into the organisation of the inter-agency collaboration against work-related crime in Norway**. It was emphasised that isolated efforts are insufficient; the fight against work-related crime requires collaboration among multiple agencies, and only joint action



can address complex challenges in the labour market. A joint management model provides the framework for organising collaboration. The collaboration aims to reduce the capacity and intent of key threat actors, empower foreign workers, and ensure employers and consumers do not contribute to work-related crime.

In the early 2000s, the opening of EU borders brought a major shift in the Norwegian labour market, with an influx of migrant workers and the emergence of new actors. Some employers complied with the law, while others either ignored or misunderstood it. Over time, the situation became increasingly organised, and the authorities realized that no single agency could handle the issue alone. As cooperation intensified, it became clear that joint operations and co-location were necessary. This realization led to the establishment of eight joint centres.

The fundamental principle was that all agencies shared responsibility for achieving common goals and should focus on tasks where collaboration added value. The model differentiated between immediate measures, which were to be handled at the joint centres, and long-term initiatives, which were managed by the agencies' line organizations. It also ensured a uniform structure across all centres, including having a centre manager, defined competence requirements, and standardized cost distribution.

Collaboration has identified three key stakeholder groups: key threat actors, foreign workers, and employers and consumers. The main goals were to reduce the capacity and intent of key threat actors, empower foreign workers to protect their rights and fulfill their obligations, and ensure that employers and consumers do not contribute to work-related crime.

The joint centres focus primarily on two objectives: reducing the capacity and intent of key threat actors and enabling foreign workers to safeguard their rights, while also ensuring that consumers do not contribute to such crimes. The agencies' annual activities were described as diverse and interdependent, involving asset seizures, prevention of organised and camouflaged operations, prosecutions, and protection of rights and obligations.

Regarding the results, in 2024 the Labour Inspection Authority imposed fines totaling 19 million Norwegian kroner and identified 24 million kroner in wrongful financial support. Nearly 100 cases were reported to the police that year. Efforts focused on key threat actors through sanctions and asset seizures, while initiatives intended for foreign workers helped ensure correct registration and proper documentation. Approximately 560 enterprises with around 7,800 employees implemented measures safeguarding workers' rights following inspections in 2024. Even though there is an increased focus on reducing vulnerabilities at both the system and societal levels, the extent of undeclared work has remained around 20% from 2019 to 2024, indicating persistent challenges despite ongoing joint institutional efforts.

There are **ongoing efforts to amend legislation governing inter-agency information sharing and to expand joint competence-building initiatives.** However, it should be noted that these efforts are both complex and costly.

To illustrate how inter-agency cooperation works in practice, the following presentation displayed a practical, intelligence-led approach to tackling undeclared work and labour-related crime in the transport sector, highlighting the importance of systematic analysis, inter-agency cooperation, and targeted interventions.

An ongoing case in its intervention phase was presented. The analysed case, referred to as Threat Actor 10 (TA10), involved a network of three companies operating in the transport and care sectors, mainly employing workers from the Baltic countries. The network had been prioritized through a scoring system that evaluated tax data, banking histories, and reports of worker exploitation. During data collection, the team relied primarily on registry information, open sources, and partner agencies



because sector inspectors were unavailable. It was noted that the network's operations raised questions: although the companies claimed to have hired experienced drivers from the Baltics, those who arrived in Norway lacked sufficient driving experience. This anomaly, combined with evidence of environmental crimes, suggested broader illegal activities.

Once the steering group reviewed the report, the control group began planning measures to limit the network's capacity and intent. The intervention phase involved **coordinated action among various authorities, including road and electrical agencies, to maximize the impact on the network's operations**. The control group based its interventions on the analysis team's assessments, defining concrete measures such as inspections and enforcement actions, and evaluating success by determining which strategies worked or failed. **Future analyses and interventions were informed by this feedback**.

Identifying undeclared work often involves overlapping legal violations, including breaches of immigration and labour laws, and the centre's focus was on describing exploitative practices rather than legal definitions.

The Government's Action Plan against Social Dumping and Work-related Crime

The national **Government's Action Plan against Social Dumping and Work-related Crime** is a comprehensive, multi-agency strategy designed to protect workers' rights, ensure fair competition, and uphold a serious and decent labour market by combating exploitation, wage theft, and labour market crime. The plan has evolved from focusing solely on work-related crime (2015) to addressing broader social dumping and work-related crime (2022), involving strong political commitment and cooperation among 10 ministries and 4 key agencies (Labour Inspection, Tax Administration, Police, Welfare/Social Administration). Agencies are mandated to prioritize work-related crime, strengthen formal and practical cooperation, share information, and leverage their combined resources for greater impact.

Norway's politicians were firmly behind the initiative, and the newest action plan contained **thirty-eight specific measures in order to fight social dumping and work-related crime**. The aforementioned four main enforcement agencies received identical instructions in their annual budget and assignment letters, making **cooperation mandatory** rather than optional.

The key elements of the current action plan were outlined, which included strengthening workers' rights in digital and platform-based work, amending immigration regulations to prevent exploitation of foreign workers, expanding penal provisions under the Immigration Act, addressing wage theft, improving the use of intelligence from the National Interagency Analysis and Intelligence Centre, and enhancing both information sharing and the balance between operational and analytical work. The plan also recognized collaboration with ELA, Nordic and Baltic countries, and projects funded through special budgets with Poland, Romania, and the Baltic states.

Concerning whether the action plan had been introduced as a preventive or reactive measure, it was found that it stemmed from Norway's experience with opening its labour market to Eastern European workers. Migrant and posted workers are needed, but the problem lays in the exploitative conditions they often face such as low wages, long working hours, and unsafe working conditions. Balancing the goal of expelling undocumented workers with the goal of protecting their rights remained a challenge that Norway is actively addressing.

The National Multi-agency Centre for Analysis and Intelligence

To demonstrate in practice how inter-institutional collaboration improves the efficiency and effectiveness of measures implemented to enforce the Government Plan, the following presentation



explored **the National Multi-agency Centre for Analysis and Intelligence (NTAES)**, a unique Norwegian initiative that brings together experts from the police, tax administration, welfare, and labour inspection authorities to produce strategic intelligence and analysis.

NTAES consists of ten staff members, and its primary purpose is to produce analytical and intelligence reports to support decision-making at the national strategic level, aiming to **prevent and detect economic crime**, as well as to promote **cross-agency awareness and intelligence** development. At the moment NTAES is the only intelligence centre authorized to collect and merge data from all four agencies, although it is prohibited from sharing confidential information with the agencies or working on individual cases, focusing solely on strategic analysis. NTAES's task is concluded with the presentation of its findings, while the steering committee is responsible for deciding measures to address the identified risks.

In 2024, NTAES completed a report on the **manipulation of official registers**. The report found that **the prioritization of user-friendliness over control mechanisms, insufficient information sharing, and a high threshold for reporting suspicions created vulnerabilities that facilitated crime**. It also identified vulnerabilities in public sector data management, noting that risk assessments focused on single agencies often miss broader societal risks. Streamlining digital systems for user-friendliness can reduce necessary controls, while limited information sharing and manual processes, compounded by unclear legal frameworks, restrict the ability to assess data reliability and share suspicions. Furthermore, uncorrected errors tend to propagate and affect multiple agencies, as corrections often remain internal and do not reach wider registers.

NTAES has recently conducted a risk assessment on the potential development of work-related crime in Norway over the next three years. The report draws on information from various sources, including publicly available literature and selected knowledge products from organisations such as the Tax Administration, NAV, the NLI, Interpol, Europol, OECD, and the European Labour Authority. To examine potential future scenarios, NTAES utilised structured analysis techniques, specifically causal diagrams. The risk assessment concluded that this type of crime is expected to persist and highlighted the need for agencies to quickly adapt to technological advancements in order to prevent criminal opportunities through emerging platforms and digital markets.

Joint Authority Activity; Norway – Lithuania

Funded through the Norway Grants, in 2019 Norwegian and Lithuanian authorities initiated dialogue to support collaboration not only between labour inspectorates but among all agencies working against work-related crime, involving ten agencies from both countries. The project aimed to strengthen Lithuania's fight against undeclared work by transferring Norway's model of joint authority cooperation and establishing bilateral joint authority cooperation. **The project achieved its goals** by providing both theoretical and practical introduction to the Norwegian inter-agency cooperation model, **facilitating mutual learning**, producing a comprehensive inter-agency knowledge report on the transport sector, **implementing practical cooperation on controls**, and **establishing a joint centre in Lithuania**. **Although the formal project concluded, cooperation between the countries continued.**

The work against work related crime in Sweden - a multi authority approach

A representative from the Swedish Work Environment Authority highlighted that Sweden had adapted elements from the Norwegian model of multi-authority cooperation against work-related crime but had to consider national differences in language, market trends, and regulatory approaches.



The program first concentrated on establishing collaboration among nine authorities, developing joint inspection methods, and expanding inter-agency cooperation. In 2022, the Swedish Prosecution Authority joined the collaboration to **strengthen capabilities in addressing human trafficking** and ensure the full investigative and prosecutorial chain was included. Trade unions played a critical role in sharing information with authorities, particularly in sectors like transport where they represented workers in the field.

Ongoing challenges regarding digital information sharing, discrepancies in regulatory frameworks, and the lack of a minimum wage in Sweden hinders the authorities' ability to effectively enforce wage standards. Enforcement of salaries primarily depends on collective agreements managed by trade unions, leaving individual workers vulnerable when collective agreements did not exist.

Conclusions / Final remarks

The study visit concluded with a comprehensive summary of the day, highlighting the key messages of the event:

- Effective operational collaboration among multiple stakeholders is crucial for enhancing efficiency at both the institutional and overall levels.
- The establishment of similar centres in Latvia and Estonia is under consideration, potentially with support from Norway. Additionally, participants were advised that ELA is available to assist any country interested in gaining further knowledge about these tools.

The Norwegian representative added final remarks, emphasising that the purpose of the session had been to share Norway's experience and knowledge realistically. He thanked his colleagues for sharing their expertise and highlighted the importance of cooperation as a solution, both nationally and internationally, expressing his anticipation of seeing increased collaboration in the future.

Further information: The study visit was integral to a larger mutual learning process among Platform members and observers and provided opportunities for exchange and collaboration. Further information on Platform activities is available at: <https://www.ela.europa.eu/en/topics/tackling-undeclared-work>