A critical perspective on the administrative approach to crime prevention: The case of labour trafficking

Hanna M Malik (iD) and **Johanna Vanto**
Faculty of Law, University of Turku, Finland

Liisa Lähteenmäki
Faculty of Social Sciences, University of Turku, Finland

Jalo Vatjus-Anttila (iD)
Faculty of Law, University of Turku, Finland

Jon Davies
Department of Criminology, School of Social Sciences, The University of Manchester, Manchester, UK.

Abstract

Building on empirical data from Finnish enforcement agencies, we reflect on the challenges of the administrative approach to crime prevention. At the operational level, we identify explicit legal and implicit extra-legal limitations for using the administrative approach, that we call (1) 'tunnel view', (2) 'structural siloes', (3) 'double role', and (4) 'blurred lines'. At the conceptual level, we consider the challenges of using the administrative approach in the context of labour trafficking. We argue that the initial set-up of the administrative approach that stresses the serious and organised crime paradigm limits understanding of the habitual and pervasive nature of labour trafficking. Nevertheless, administrative cooperation has the potential to contribute to full 'labour justice' as a governance framework that coordinates the efforts of public authorities and their multidimensional strategies to account for the entire labour exploitation spectrum.

Corresponding author:
Hanna M Malik, Faculty of Law, University of Turku, Caloniankuja 3, Turku, Finland.
Email: hanna.malik@utu.fi

Introduction

In 2010, the European Council adopted an agenda of enhancing and promoting the exchange of information between administrative bodies and traditional law enforcement organisations, by setting up a special European Network on the Administrative Approach (ENAA, 2020). This was a part of a broader shift in crime prevention, from repressive penal approaches to multidisciplinary and preventive collaboration that began in the European Union in the 1990s. The emphasis of 'the administrative approach' (hereafter ADM) is to co-ordinate efforts of local government, regulatory and licensing agencies, tax- and traditional law enforcement authorities, as well as to combine administrative, fiscal and criminal law-based measures to counter and suppress crime. Hence, as a form of 'whole-of-government approach', ADM inherently promises to tackle 'wicked policy problems' (Rittel and Webber, 1973) that span traditional divisions between ministerial areas, policy sectors and enforcement tasks (Jahnsen and Rykkja, 2020).

Despite these intentions, most EU member states are less advanced in implementing ADM and have not developed a coordinated strategy across policy, legislation, and operational levels (Spapens et al., 2015). In Finland, while there is legislation in place to regulate sectors that are particularly susceptible to serious and organised crime, and by extension labour trafficking, administrative filters have not been applied in a systematic and coordinated way with the primary purpose to prevent and tackle crime. The data of this article were originally obtained as part of efforts to create a national approach to disrupt the operating environment for serious and organised crime by using ADM (EU-Handbook, 2020; Hyttinen et al., 2019).

Building on pioneering empirical data from Finnish regulatory agencies, we examine their understanding of administrative measures in crime prevention and the perceived challenges of coordination between police and other public authorities. Hence, we reveal possible gaps between the assumptions of ADM, promoted in the EU, and the practices of administrative measures, executed at the local level in member states. We focus on the potential application of ADM to the full labour exploitation spectrum, which, ranging from 'routine' exploitative labour practices enabled by licit socio-political, legal and economic mechanisms, to more severe work-related crimes, and ultimately human trafficking, constitutes a 'wicked policy problem'. These complex issues cross-cut responsibilities of different public, private, and civil society actors at different levels and traditionally have not been prioritised among the police and other criminal justice actors (Alvesalo et al., 2014). We reflect on the initial set-up of ADM, and the potential shortcomings of applying it to these types of cross-sectional issues. We begin this paper by grounding the basic assumptions of ADM in previous theorisations on multi-agency cooperation. We then move to the core of our paper, offering empirical evidence to substantiate these theoretical considerations.

While we focus on the present capacity of relevant stakeholders to implement ADM in Finland, the grounds on which national stakeholders successfully cooperate or fail to do

so have repercussions for international cooperation. This is even more important given the ever-growing internationalisation of business activity, labour migration and concomitant pressure for cross-border cooperation in these areas. In addition, Finland provides an interesting case to reflect on the appropriateness of the administrative approach to tackle the complexity of labour trafficking. Finland scores high in anti-trafficking rankings (DOS, 2020), yet the problem persists, prompting multi-layered responses from different branches of government and a variety of public and private stakeholders. In fact, the efforts to implement ADM are concurrent with several initiatives addressing labour trafficking via multi-stakeholder cooperation such as the Strategy for Tackling the Grey Economy and Economic Crime (2020: 5–6, 45 ff.) – hereafter Grey Strategy.

Theoretical framework

The concept of ADM

The administrative approach (ADM) was first formulated as a strategy to prevent serious and organised crime (EU-Handbook, 2011). Ultimately, the approach was extended to all types of crime (Spapens et al., 2015), with an emphasis on actions related to organised property crime, money laundering, smuggling of migrants, and trafficking in human beings (EU-Handbook, 2020). In European practice, ADM has been predominantly applied in a cross-border context to deal with motorcycle gangs, for example in the Euregion Meuse-Rhine (EUCPN, 2014). However, it has also been utilised to tackle human trafficking in the Belgian cities of Genk and Antwerp in cooperation with several Dutch partners in the framework of the project Confine (2018).

The third EU-Handbook on the Administrative Approach (2020) condenses its substance to five elements. *First*, ADM seeks to prevent and address the infiltration of organised crime enterprises into the legal economy by creating barriers to the criminal use of legal administrative infrastructure. In this framing, organised criminal groups use legitimate business functions to develop and extend their criminal activities such as human trafficking (EU-Handbook, 2020). *Second*, ADM works on the assumption that local authorities are often the first to identify and be able to prevent the infiltration of the licit economy by criminal networks. Conversely, by granting licenses, subsidies and public tenders to criminal groups or individuals, administrative authorities may unknowingly facilitate serious and organised crime. It is therefore important to protect the integrity of administrative authorities and enhance their awareness of shared responsibility for crime prevention (Spapens et al., 2015: 3, 606).

Equipped with a range of measures such as withdrawing permits and licenses, administrative authorities are likely to complement traditional policing strategies in reducing crime opportunities and creating barriers for furthering illegal activity. Consequently, the *third* element of ADM is multi-agency cooperation and coordinated interventions. *Fourth*, this multi-agency cooperation relies heavily on information exchange between law enforcement and other authorities. Indeed, one of the biggest challenges of ADM is to establish grounds for effective information exchange, especially to enable information flows from law enforcement and tax authorities to local governments and other administrative agencies (Huisman and Nelen, 2007). This requires both trust and

sufficient legal and institutional frameworks. Against this background, the *fifth* objective is to bring together information scattered between various partners to visualise the process behind crime, its indicators, facilitators, and opportunities in the given region, and to jointly determine the most effective actions to set barriers and reduce criminal opportunities (Spapens et al., 2015: 606).

These key elements of ADM are consistent with prevailing strategies to tackle human trafficking such as 'partnership ethos' (Atkinson and Hamilton-Smith, 2020), 'sharing of information' (Winterdyk and Reichel, 2010), and cooperation with private and public partners outside the police to uncover signals of trafficking (Bjelland, 2017). On the other hand, in this understanding human trafficking for labour exploitation is framed as an exceptional crime perpetrated by organised crime networks that require criminal justice interventions. To the contrary, the proponents of a structural approach frame (non-criminalised) exploitation of labour market vulnerabilities and human trafficking as a part of the same spectrum (Shamir, 2012: 109), and thus call for a wide range of interventions to achieve 'labour justice'. In brief, the concept of labour justice refers to interventions beyond the criminal justice system, including the role of public authorities, and more broadly, civil society actors and trade unions, that can help redress worker grievances or enhance their labour conditions (Skrivankova, 2010). For the purposes of this paper, we focus on the former, that is, the role of public agencies.

Similarly, some criminologists conceptualise labour exploitation as a subset of corporate crime (Alvesalo et al., 2014; Davies and Ollus, 2019), shifting attention from individualistic explanations towards systemic factors: first, the symbiotic state-corporate mechanisms that enable crimes and harms; and second, power relations, organisational hierarchies and particular priority settings that hamper adequate recognition and control of these issues. Approaches to such crimes and harms span from consensus-oriented strategies, which emphasise soft law and 'incentive-based' regulation, to conflict-driven punitive strategies that prioritise policing, coercion, and deterrence (Tombs and Whyte, 2015). Regardless of the framing, the diversification of enforcement tools, and a multidimensional strategy that combines coercive state interventions with regular monitoring activities is considered one of the most effective ways to improve enforcement in the market context (Braithwaite, 2020; Schell-Busey et al., 2016) and achieve full 'labour justice' (Davies, 2019). Here, the concept of ADM offers a governance framework to conceptualise and ease multi-stakeholder cooperation in tackling the entire spectrum of exploitation.

Challenges of multi-agency cooperation

At an operational level, the administrative approach follows the barrier model, which corresponds closely with routine activity theory (Bruns, 2015), emphasising the need for a motivated offender, suitable target, and lack of guardianship or regulation for crimes to occur (Cohen and Felson, 1979). Still, the core of ADM is multi-agency cooperation, which is frequently explored in policing literature (Boels and Verhage, 2016). Policing in modern societies is provided by a horizontal network of private and public actors not limited to hierarchical structures and public police organisations, and relies heavily on exchanges of information, expertise, resources, and knowledge (Scarpello, 2017).

Highlighting the relational nature of policing co-created by public and private actors, previous studies focus on questions of the why and how of plural policing, especially relations between different policing agents, with the aim to map and improve policing arrangements (Scarpello, 2017). Our goal is similar; however, we adhere to the broad understanding of 'crime' and 'crime prevention' that shifts from individualistic towards organisational and systemic explanations of harmful practices rooted in political-economic systems as frequently explained in corporate crime literature (Alvesalo et al., 2006). Thus, while recognising insights from police sociology, we are more interested in the question of coordination.

In the Nordic context, Nøkleberg (2020) analyses inter-organisational private-public collaborative networks. He utilises, among others, the concept of brokerage to empirically test distribution of power in security networks. Traditionally, the police serve as the leading broker in security networks, even though other actors potentially possess better suited expertise. This is particularly relevant in cases of 'wicked policy problems' (Rittel and Webber, 1973), too complex to be conclusively described and defined, and therefore defying optimal solutions, and spanning traditional divisions between ministerial areas, policy sectors (Jahnsen and Rykkja, 2020), and mandates of enforcement and regulatory authorities. This organisational fragmentation is reinforced by the proliferation of New Public Management (NPM) and other neoliberal result-oriented management approaches that drive decentralisation, marketisation, privatisation and professionalisation to enhance the productivity of public services (Temmes, 1998). These divisions, in particular specialisation and sector-orientation, have the potential to distort perceptions of cross-sectional issues, that is, to obscure the 'bigger picture', and by extension, hinder effective interventions (Dagnes et al., 2020; Jahnsen and Rykkja, 2020).

Our focus on 'wicked policy problems' overlaps with Giacomantonio's (2015) work on coordination in the interstitial areas of public police organisation. Coordination work, understood as determination of responsibilities, protocols, and jurisdiction, lays the foundation for establishing and maintaining working partnerships between relevant stakeholders. Police work, traditionally coordinated *ad hoc,* is based on continuous negotiation over several boundaries: resource availability (scarcity); geographical and functional distance (proximity); and operational coordination between units (technical/systemic boundaries). Boundary negotiations tend to rely on informal and interpersonal connections rather than hierarchical systems and clear responsibilities (Giacomantonio, 2015: 115). However, a clear shift in the character of partnerships is observable, from ad hoc and informal gentlemen's agreements to formalised frameworks.

ADM is an example of formal coordination. It offers a governance framework that includes legal and institutional structures and a set of coordination principles aimed at reshaping the priorities and work culture in several public authorities. Simultaneously, at a conceptual level, ADM offers an extended crime prevention strategy that goes beyond narrow understandings of crime and criminal justice. Still, while observing the shift towards formalisation in coordination work, Giacomantonio (2015: 151) points to its ambiguity. On the one hand, such formalisation facilitates ways to avoid redundancies, inhibits development of inter-organisational antipathies, and avoids communication breakdowns. On the other, it creates new boundaries to be overcome and circumvented by interpersonal and informal connections (Giacomantonio, 2015: 152). Despite these potential

pitfalls, while there is a substantive number of best practices and policy recommendations (EUCPN, 2014; Confine, 2018), critical evaluations of ADM are rare (Huisman and Nelen, 2007; Kersten and Roevens, 2015).

Operationalisation of ADM

Modelled on the New York double strategy to control organised crime (Fijnaut, 2010), ADM was first implemented in the Netherlands. There, the formalisation of investigative and cooperation work took three forms. At the national level, there was new specialised legislation and an institutional platform to exchange, collect, and analyse information and expertise, inherently aimed at limiting 'proximity boundaries'. At the local level, the formalisation initiatives targeted 'scarcity' and 'systemic boundaries'. To this end, several specialised units (e.g. Van Traa Team) were appointed to develop and implement ADM in the City of Amsterdam (Kleemans and Huisman, 2015).

While these early attempts at implementing ADM have been promoted as a best practice and spearheaded its implementation in the EU, their evaluation exposed several conceptual and operational problems pointing to the ambiguities asserted by Giacomantonio. At a conceptual level, the administrative approach was criticised as a form of 'responsibilisation strategy' (c.f. Juhila et al., 2017). For instance, Huisman and Koemans (2008) argue that the use of administrative measures to prevent crimes tend to bring in paradoxical consequences, such as an increase in the scope of the criminal justice system and criminalising of everyday behaviour (Kleemans and Huisman, 2015). At the operational level, the evaluators of Van Traa Team asserted a passive cooperation between authorities (Huisman and Koemans, 2008).

In Giacomantonio's framing the coordination work, understood as negotiation over different types of boundaries, is influenced by work cultures of coordinating inter- and intra-organisational actors, and the content of law and policy (Giacomantonio, 2015: 118, 120). Interorganisational mentalities, rationalities, and working practices may facilitate cooperation between similarly organised stakeholders (c.f. Nøkleberg, 2020). Despite such similarities, in the Van Traa case, the cooperating partners did not recognise ADM as part of their core activity (Huisman and Nelen, 2007). In contrast, the mandate of a special unit gave other agencies an excuse to be less active in the field of administrative prevention (Kleemans and Huisman, 2015). Also, the attitude of the police force to sharing crucial intelligence reflected a 'passive willingness' rather than 'proactive attitude' (Huisman and Nelen, 2007). Thus, the evaluation revealed discrepancies between the organisational design of ADM and its operationalisation among street level bureaucrats (Huisman and Nelen, 2007), and highlighted the need to define common goals, priorities, and standardise operational tactics between cooperating stakeholders.

Data and methods

The data of this article were originally obtained to examine Finnish officials' knowledge and experiences of administrative measures. As empirical research on the topic is scarce, we designed a mixed methods approach with a structured survey, followed by in-depth interviews, in 2017. The survey questions were designed to be exploratory: for instance,

respondents' familiarity with ADM; prevalence of various measures; target crimes of the measures; occurrence of cooperation between authorities; problems relating to cooperation; and ideas for developing ADM in practice. The subsequent 15 semi-structured interviews, conducted in 2018, build on the results of the survey, highlighting the experiences of cooperation. By using both a survey and the interviews we aimed at a more comprehensive story than either method could achieve alone (see Teddlie and Tashakkori, 2009).

Survey participants were selected by mapping various potential actors among Finnish authorities according to their duties that included licensing, inspection of premises or procedures, legality control, or statutory supervision of work safety. The mapping proved to be a somewhat tricky task as the population seemed indefinite and scattered. We used Spapens et al. (2015) definitions for administrative measures as a starting point for the mapping.

We selected individuals with discretionary sampling from each identified relevant unit and contacted them by email. As we wanted to explore diverse experiences, we targeted officials at various levels of administration. Altogether, we sent the survey to 47 different authorities, and to more than 470 individuals. Considering the versatile nature of various agencies and their core tasks the survey population became very heterogenous. Still, the problem was that in many agencies we were able to contact only a few respondents.

The response rate of the survey was 38% as 180 people in 35 units responded. 24% of the respondents worked at a managerial level, 22% in inspection and supervision, 11% in licencing, and 10% were lawyers. The rest represent secretaries, fire and environment inspectors, and other experts. The Regional State Administrative Agencies (AVI) represent the largest group of respondents, followed by the police, Centres for Economic Development (ELY), and local government.

Minding the fact that the subject was somewhat sensitive, especially given the questions included potential problems in cooperation - the survey was conducted anonymously with Webropol. Therefore, we were only able to group the answers according to the authority the respondents represented (self-reported). The survey data hence unveils recurring thoughts regarding ADM at various regulatory agencies in Finland, while the interviews provide a more nuanced narrative of the respondents' experiences and attitudes.

The interviewees were recruited via the survey by asking respondents to volunteer. Altogether 41 people volunteered and from this pool we selected 11 individuals that represented as wide a sample of different authorities as possible. We also used snowballing to identify relevant individuals who may not have been reached through the survey. Employing qualitative content analysis, we abstracted the interviews by coding them in accordance with the topics covered in the interview guide. We then identified content areas that address the possibilities and challenges of employing administrative measures and proceeded by creating categories and subcategories with interpretation. The interviews, conducted in Finnish, were recorded and transcribed verbatim. We translated the citations used in this paper into English, maintaining the style of the original transcript. When quoting individual interview participants, we use pseudonyms (letters of the alphabet) to refer to them.

Results

Awareness and use of ADM

In general, the term 'administrative measures' (ADM) was relatively unknown to the respondents. In total, 60% had either not heard of the term or had heard of it but were unsure of what it meant. Only 7% stated that they use ADM in their work. Those familiar with the concept mainly work in the police, the tax authority, or customs. While many participants were unfamiliar with the ADM terminology, they were aware of concepts linked to it, such as the 'fight' against the grey economy or reducing opportunities for crime by cooperation and information exchange. This outcome is not surprising. A multi-dimensional strategy that harnesses information exchange and cooperation between different authorities is a key element of the Grey Strategy (2020).

As we anticipated that the ADM term might not be well known, we gave the respondents a list of precise measures connected with ADM as identified in the EU-Handbooks (2011) and asked whether participants were familiar with these measures. The most familiar measures were joint briefings (77% were familiar with this measure), information exchange (69%), and joint campaigns and operations to tackle crime (61%). These measures were used by 60% of the respondents. Hence, the Finnish authorities encounter and work with administrative measures, especially at the levels of cooperation and information exchange - they just do not recognise the term 'administrative measures'.

We also asked about the type of criminal activity ADM is used to prevent. The crime type respondents mentioned most often was tax offences (34%), followed by money laundering (20%), and environmental crimes (20%). Employment-related crimes and human trafficking were mentioned as well, but their share of target crimes was only 10%. Human trafficking was mentioned in only 3% of the answers. Major target sectors named in our study included construction (40%), as well as hospitality (33%), which are sectors that offer a high concentration of entry-level positions, thereby employing the bulk of migrants and foreign nationals in Finland. Notably, these sectors have been identified as those with the highest number of suspected underpayments, work discrimination, exploitation, and human trafficking (Ihmiskauppa, 2019). Still, it seems that administrative measures are not used to tackle labour exploitation and human trafficking but, rather, fiscal harms. This is consistent with the Grey Strategy framing that is focused on economic crimes within the cash- and labour-intensive sectors, such as construction, ship building, hospitality, and tourism.

Multi-agency cooperation

As cooperation is key in the EU model of ADM, we asked about its pros and cons. One of the problems that the survey participants identified revolved around unilaterality and centralisation. Cooperation seemed to occur mainly between the participant and the police, or the participant and the tax authority – regardless of who the participant was. When asked with whom the respondents had been cooperating, they mentioned other agencies only sporadically. So, the nexus of cooperation in administrative measures is notably *fixated around the police*. The corollary may then be that ADM is defined largely according

to police priorities. In addition, when asked about the success of cooperation, 30% of survey respondents stressed the familiarity and stability of the connection, stating that successful cooperation requires personal contacts and an established relationship between officials. Cooperation was seen as requiring 'personal chemistry' and trust, as well as equal exchange of information. This further emphasises the nature of cooperation among authorities as it seems that the lines of communication are *not official but, rather, personal*. In the survey, one respondent described the situation as follows:

> "Efficient cooperation, the kind that doesn't halt with administrative boundaries, is mainly due to individual, enterprising and dedicated officials rather than cooperation being a coherent and steady part of action within administration."

Participants' perceptions of their role in crime prevention

Having explored the view that cooperation is not necessarily straightforward, we explored how participants viewed their personal and organisational role in crime prevention. We discovered that, terminology aside, most survey and interview participants considered crime prevention an integral part of their work or the activities of their organisation. However, the occupational safety officials (AVI) we interviewed perceived crime prevention and the criminal justice system as rather peripheral in their own work.

Labour inspectors have the right to enter workplaces, inspect work permits, and demand information they need to ensure that minimum working conditions are fulfilled. However, even as their duties involve tasks which are intimately connected to work-related crimes (safety crimes, discrimination, exploitation), the interviewed officials viewed these tasks as somehow external in relation to the 'normality' of their work. An occupational safety official described their take on the matter:

> "It should be made clear – even inside the occupational health and safety organisation – what our task is. That we are about occupational health and safety. That is our priority. Then we have the supervision of contractors' obligations and supervision of foreign employees' right to work….and they are like, from the point of view of our priority… a bit of an oddity." (Interviewee C)

Occupational safety officials in Finland do not have the authority to conduct pre-trial investigations. So, even though the prevention of crime is not solely the task of the police, different authorities perceive the police as an entity that 'specialises' in crime. This is perhaps most clearly manifested in how roles are divided between different actors when occupational safety officials decide to conduct a surprise inspection, for instance to a construction site, as they invite the police along to handle any potential criminal matters. At the same time, occupational safety officials are aware that they still have a role to play in any criminal investigations in their own field of administration. This role is often perceived as arduous, lengthy, and as involving additional hurdles, such as 'several-year-long legal processes' (Interviewee D).

The occupational safety official's comment above reflects the idea that work-related criminal processes are time-consuming and burdensome. As administrative officials are

required to contribute to the criminal process, they see criminal cases as adding to their workload – rarely contributing anything meaningful to their own work. On the contrary, with a tinge of cynicism, another occupational safety official (Interviewee B) remarked that each time they report a work-related crime to the police, they must spend a considerable amount of time *'training' (i.e. instructing in detail) police officers* who may have no previous experience of work-related crimes. In addition, the same official suggested that the link between labour inspections and the criminal justice system is not close. The participant noted that labour inspectors rarely report any crimes, tackling issues predominantly by means of administrative steering:

> "Let's put it this way: occupational safety supervision work is an administrative process, but its connection to criminal law is not… it's not very intimate. So, we don't normally report cases anywhere as crimes, but we mainly take care of them through administrative guidance and supervision. So, these criminal matters are kind of like a marginal phenomenon." (Interviewee B)

Another participant noted that AVIs' role in preventing crime is rather narrow, as everyone takes care of their designated responsibilities. Accordingly, AVIs' designated responsibility is to monitor contractor's liability, foreign employees' right to work, and compliance with occupational health and safety regulation (Davies and Ollus, 2019). Indeed, more than the 'administrative' aspect in the administrative approach to crime prevention, it is the 'criminal' aspect that was experienced as troubling by other officials too, as an emergency services official expressed it:

> "[i]f it becomes a criminal… investigation, through us, it may be slightly… it won't improve our reputation. So, these days, it's like when we go to a site as (…) officials offering emergency services, people somehow trust that it's going to be the only thing we focus on." (Interviewee E)

This stance was reinforced by the observation that interview participants with a background in pre-trial investigation authorities (of which the police and Customs were included in this study) did not express reservations with the approach or with the idea of cooperating with administrative authorities. It was the administrative officials who felt that their work or their organisational culture was not ideally suited for a *criminal justice-oriented approach* or closer cooperation with pre-trial investigation authorities.

Limitations to ADM

Aside from limitations pertaining to the officials' perceived roles in crime prevention, the participants brought up several explicit legal and implicit extra-legal limitations for using ADM. While the *explicit limitations* are linked to written legal provisions, or lack thereof (whether these obstacles exist or not, may of course be a matter of legal interpretation), the *implicit limitations* are extra-legal and often arise out of perceived work roles and cultures.

Explicit limitations. Legal limitations, which the participants associated with ADM to crime prevention, include both the existence of restrictive legal provisions and, conversely, the lack of clear legal provisions, perceived as limiting (or inhibiting altogether) information exchange between organisations. In total, 58% suggested amendments to legislation concerning information sharing. Legal provisions were perceived as restricting access to criminal records, tax records, and other essential information for evaluating the reliability of a license or permit applicant, or for targeting inspections. Interviewees elaborated on this point by calling for (clearer) provisions for officials to report their observations to another authority on their own initiative:

> "…[I]f our [inspector in an administrative field unrelated to the labour inspectorate] observes something, like if they suspect that there was illegal workforce or something, there should be [a provision], so you didn't have to figure out whether you can say something about this suspicious [activity] to another authority. If you had a provision that gave you the right, not the duty [to report], it would encourage [reporting] in a situation where (…) you saw something (…) suspicious." (Interviewee A)

In addition, the legal tools available for tackling serious and organised crime were described as wanting to some extent. The available administrative measures are too slow, and swifter instruments, such as fines that the official could impose immediately on site were called for. Whether adequate measures are available or not, they would be of little use in cases surpassing jurisdictional boundaries, as an occupational safety official says:

> "Then there's of course this foreign workforce, which is another issue altogether. (…) [W]hen we run into this country's borders, that's where our jurisdiction ends. And these actors… they act in the common market area, so there's quite a disparity. So, like… this can sound like evil and mean federalism, but maybe there should be supranational supervision in some matters, if we really wanted to make a difference." (Interviewee B)

The point here on jurisdiction and national borders, as well as the reference to supranational oversight, raises the question as to what role pan-EU institutions should have in enforcement. The question of European-wide enforcement bodies is hardly a new one, as seen with organisations such as Europol. However, the recently established European Labour Authority (ELA, 2020) suggests a growing emphasis on the need for cross-border cooperation and oversight of labour mobility. It is not yet fully clear whether national enforcement agencies are receptive to bodies like the ELA, or whether there is some perceived 'interference' or added complexity to their enforcement work. In principle, consistent use of ADM throughout EU member states could facilitate these cross-border efforts.

Implicit limitations. Survey participants named a diverse set of extra-legal limitations that are broadly linked to work cultures. We identified different (sometimes overlapping) categories of implicit limitations, which we call the (1) 'tunnel view', (2) 'structural siloes', (3) 'double role', and (4) 'blurred lines'. In total, 31% of survey respondents mentioned one or more of these implicit limitations. These limitations do not exist in a vacuum, but

are, much like legal limitations, linked to decision making in a specific political and administrative context with specific organisational cultures, aims, approaches, attitudes, and mentalities. We further explored these categories in the interviews.

When conducting an inspection, some interview participants said they or their colleagues had difficulties determining what kind of observations might interest other authorities, and whether reporting their observations to another organisation was justified. We call this the '*tunnel view*': the official's knowledge, awareness, and attention are zoned in on what is relevant in their field of administration, and they may not be familiar enough with substantive legislation in other fields of administration to interpret their observations (for instance, when provisions are perceived as too complex). This may prevent the official from recognising potentially criminal activities, as an ELY official expressed it:

> "I don't really know what we should be observing if we are, for instance, inspecting a facility. I mean, what we should observe in addition to observing [things] in our own activity sector. Of course, if (…) somebody is being beaten or stabbed then we should do something about it. (…) We probably can't ask to see anyone's residence permits or working permits or worksite cards. (…) I would assume that construction workers should have some sort of a construction worker card, but I don't know what kind of a card that is and whether they should have it." (Interviewee F)

Closely linked to the 'tunnel view', the participants mentioned limitations that we categorise as '*structural siloes*': barriers embedded in organisational structures and hierarchies, and power relations that influence priority settings and allocation of responsibility, or lack thereof. These organisational barriers affect cooperation with other actors in the fear that cooperation will not generate any measurable results; attempts to tackle crime together are uncoordinated and ineffective at best; and that time spent on cooperation is not acceptable in the view of superiors. These perceptions echo the management by results approach where calculable results are important, as each public organisation receives funding based on the results they produce. Hence, each administrative organisation has their own 'key tasks', aims, and priorities, which can cause conflicts of interest between organisations, or as a participant from the criminal justice system expressed it:

> "Each actor has their own priorities. And if one group prioritises getting money and another group prioritises protecting citizens or at least trying to protect, so if these [actors] work very close to each other, you have this tricky situation where you're not sure which priority is the most important. (…) The weakest link is where you don't look at things as a whole…" (Interviewee G)

Some participants also discussed administrative officials' uneasy balancing between the desire to both satisfy the recipient of services and to fulfil their role as supervisors and inspectors. We refer to this as the '*double role*'. Echoing concepts of the NPM approach, this way of thinking encourages officials to view those whose activities they are required to supervise as 'customers', instead of viewing them as objects of administrative measures. While the customer-oriented public management approach has advantages, some participants also perceived it as an impediment, preventing officials from taking measures which would put their 'customer' in a predicament. Some participants perceived these

two roles as conflicting and even undermining one another. An ELY official described the internal conflict official's experience in field work:

> "…our inspections are constructed in a way that specific people always [inspect] specific facilities, so in practice, you do form a sort of relationship with those they inspect. And then it's unpleasant to report a crime, putting those you inspect into (…) a difficult situation. (…) It's not friendship, it's not even acquaintance, but when you cooperate with someone for years and the representative of the company contacts you and asks, 'what should we do?' and 'we have this problem' and 'now this happened', so you keep in contact just like you're supposed to, and you just form a… well relationship. (…) It's just difficult to report a crime [when the suspected perpetrator is] someone you know and knowing it will mean tough times for [that person]. I think that's the reason." (Interviewee F)

One interviewee brought up a notion of '*blurred lines*' between the public and private spheres. The participant was concerned with increasing privatisation, enabling organised criminal groups to take up critical tasks and services in society. Members of organised criminal groups 'infiltrate' public administrative and political positions, enabling them to influence decision making. The participant thought the problem was even more prevalent on lower levels of public administration. They also pondered whether it is justifiable to limit ADM only to actors within the 'public sector' and, if not, how far the approach and any delicate information along with it could be taken into the private sector (Interviewee G).

Concluding discussion

Policy recommendations condense the idea of ADM to serious and organised crimes to five pillars: (1) preventing and tackling misuse of legal infrastructures for serious and organised crime; (2) shared-responsibility of administrative authorities for crime prevention; (3) multi-agency cooperation; (4) sharing of information and (5) joint-actions to set barriers and reduce criminal opportunities. Like the earlier evaluations of ADM in the Netherlands, our findings reveal discrepancies between this design and the practices of administrative measures executed at the local level in Finnish police and other public authorities. In this context, our participants highlighted explicit legal and implicit extra-legal limitations for using the administrative approach that provide a starting point for developing cooperation in the future. The five pillars of ADM can be divided into conceptual (1 and 2) and organisational (3–5) elements. The limitations for using ADM experienced by our participants crosscut these issues. However, notably, our participants related stronger to the organisational elements, whereas the conceptual understanding of ADM was underdeveloped.

Concept and operationalisation of ADM

We found that the representatives of participating authorities had a limited understanding of the ADM *concept*, in particular of the *first pillar* and the underlying assumption of the administrative approach that the upper- and the underworld are constantly intertwining,

enabling organised criminal groups to operate within legal economy. In fact, only one of the interviewed representatives referred to the 'blurred lines' between public and private spheres and dangers of increasing privatisation that enables organised criminal groups. This, in line with previous research, deems local administration vulnerable to mafia infiltration (Dagnes *et al.*, 2020) and thus require appropriate protection strategies, such as ADM.

The *second pillar* of ADM: shared responsibility of administrative authorities for crime prevention and the complementary character of the approach recurred in many responses. Our participants acknowledged the goal to disrupt the opportunities for crime and the role of non-penal interventions in achieving this. Still, while we discovered that most participants considered crime prevention an integral part of their work or the activities of their organisation, it was hardly perceived as priority. As elsewhere, crime prevention in Finland is traditionally associated with the core duties of the police. Hence, the nexus of cooperation was notably fixated around the police and to a lesser extent other authorities.

The respondents' strong emphasis on the police is consistent with Nøkleberg's (2020) framing of the police as the leading broker in security networks that consist of public and private actors. Here, we focus on the public-public partnerships that involve police and other public authorities. The latter, in principle, possess better expertise, as well as legal and operational instruments to tackle root-causes of criminal activity. Indeed, the concept of shared responsibility seeks to shift the regulatory lens to the foreground of the criminal process, that is, to the supporting infrastructure and accompanying activities of organised crime, facilitators, and opportunities (Bruns, 2015). In this context, some participants criticised the lack of expertise and the need to 'train' police officers with whom they cooperate.

Adhering to the narrow understanding of 'crime' and 'crime prevention', the participants understood ADM as a criminal justice-oriented strategy and a shift of the regulatory gaze towards the most severe cases and not the other way around. Consequently, they perceived the concept of shared responsibility and their own role as subsidiary to enforcement authorities in fulfilling their tasks (see Huisman and Nelen, 2007). These outcomes are consistent with the critique of ADM as a form of 'responsibilisation strategy', in which other agencies are brought in to deal with matters previously regarded as police matters (Kleemans and Huisman, 2015). In its conceptual design the objective of ADM is to provide a holistic view of the criminal process by merging information from various partners and by empowering a range of actors on the ground to observe indicators of 'crime' outside the purview of their authority. In that sense the concept of shared responsibility contradicts the administrative culture in Finland, where trust in public administration to respect the legal boundaries of their authority is relatively high (Salminen and Ikola-Norrbacka, 2010).

In addition, the customer service orientation of certain public authorities was perceived by some participants as a significant limitation to ADM. In this framing, representatives of administrative authorities must balance the 'double role'. as service providers and supervisors. This dilemma may perpetuate the gap between deterrence and consensus-oriented approaches as discussed in corporate crime studies (Tombs and Whyte, 2015). Contrary to criminal justice actors, regulators enforce through

persuasion, advice, education, and bargaining, compromising with the regulated (Tombs and Whyte, 2015). In the context of ADM, the nexus of cooperation fixated around the police may lead onto a narrow range of interventions applied, and so ultimately call into question the value of ADM as a conceptual and operational tool to tackle intersectional issues.

At the *organisational level*, participants understood the core substance of ADM better. They related to its key principles of multi-agency cooperation (3), information exchange (4) and joint actions to set barriers (5). They just did not connect them to the term 'administrative measures'. Still, even though familiar with these organisational elements, participants pointed to significant limitations to the coordination work connected to work cultures. Previous research indicates that the intended efficacy of cooperation often becomes limited when the cooperating stakeholders remain pre-occupied with the detail of their day-to-day tasks without acknowledging broader issues, or at least relevant detail that other agencies possess in relation to a given case. This is what Cilliers and Greyvenstein (2012) call 'silo mentality'.

To bring out the nuance to these limitations we distinguish between 'structural siloes' and 'tunnel view' adopted by some participants. The tunnel view, or how officials' awareness and attention is limited to their field of administration, is an expression of 'proximity boundariess'. Ultimately, it comes down to the lack of experience and expertise that can be tackled by continuous training and awareness-raising campaigns as envisioned in the ADM guidelines (EU-Handbook, 2020). The 'structural siloes', in turn, materialise in hesitancy and in the fear of not generating acceptable results from cooperation with other agencies, and ensues from 'scarcity boundaries', directly connected to what Giacomantonio (2015) calls 'coopetition'.

These limitations are intimately linked to organisational cultures, aims, attitudes, and mentalities, while simultaneously being reinforced by explicit legal limitations. Bound to their 'designated authority' and 'purview of their authority and job description', actors sharing responsibility for cross-sectional issues may gravitate towards parallel, disconnected approaches (Skilbrei and Tveit, 2008). The vague prescriptions of tasks and jurisdictions in legislation and public management policies may also constrain cooperation (Giacomantonio, 2015), and facilitate these narrow attitudes. In our findings the lack of clear provisions enabling voluntary reporting to another authority was seen as a problem in situations where the official observes something outside the purview of their authority or job description. Coordination of structural siloes may require standardisation of work processes in the form of organisational consortia, formal agreements and covenants clearly assigning roles and responsibilities to stakeholders (Kersten and Roevens, 2015). To avoid political setting of priorities (Kleemans and Huisman, 2015), cooperation should be preceded by a thorough analysis of threats and available measures.

Against this background, ADM offers a conceptual and governance framework that includes legal and institutional structures, and allows stakeholders to overcome the 'tunnel view', 'siloes', and to tackle 'wicked problems' that span scarcity, proximity, and systemic boundaries. Still, the nature of some cross- or multi-agency cooperation depends much on personal chemistry and relationships. This is not necessarily a problem when individuals have a positive working relationship, but when they change

roles or retire, the success or hindrance of multiagency cooperation, and the whole approach, may depend on the whims of personal preferences and grievances. At the time, the use of administrative measures in crime prevention was steered by each individual unit, according to their priorities and with the support of 'dedicated individuals'. Therefore, to avoid the ambiguity of formalisation of coordination work (Giacomantonio, 2015), ADM should be steered and negotiated simultaneously on the street and managerial levels of administration.

Administrative approach to labour trafficking

Cooperation that crosses intersectional boundaries is important in the context of 'wicked problems'. As such labour trafficking (Jahnsen and Rykkja, 2020) that spans from criminal, illicit to 'unethical' practices that are rooted in licit mechanisms, presents a multi-faceted challenge beyond traditional policy sectors, regulatory and enforcement tasks. The nature of labour trafficking as an 'unclaimed and contested area of responsibility' (Giacomantonio, 205) and ultimately 'nobody's property' (Ollus and Alvesalo, 2012), may prompt disconnected responses and facilitate structural siloes between relevant actors. Finnish policy makers acknowledge the embeddedness of labour exploitation in labour-intense sectors, working to unify disconnected responses. In 2020, the Finnish Government rolled out a new Strategy and action plan to boost supervisory activities, cooperation, and information sharing between multiple authorities to prevent and detect human trafficking and labour exploitation, as a part of the Grey Strategy (2020: 5–6, 45 ff.). In parallel, the Government Program promised to increase power and resources to AVI, increase resources and expertise to the police, and create a police unit focused on human trafficking in 2021 (Finnish Government, 2019: 82–83). This framing of labour trafficking via the lens of the grey economy marks an important shift from individualistic explanations in reference to 'bad apples', to structural issues embedded in political and socio-economic systems.

The five pillars of ADM offer an additional solution to address different instances of labour trafficking in Finland. ADM was previously applied to concerted efforts of labour inspection, the police, and licensing officials in the context of project Confine (2018). In the case of Confine, local authorities were trained to recognise and react to financial and administrative indicators of illicit activity, which in turn enabled coordinated prevention mechanisms targeted at human trafficking. If applied to our findings, similar efforts could mitigate the 'tunnel view' limitation. At the same time, however, Confine adhered to the conventional framing of human trafficking as a gross violation of human rights and the most lucrative crime after drug trafficking. Like the Finnish Grey Strategy, Confine brought attention to organised criminal groups committing economic offences and using business structures to cover other criminal activities. Consequently, the intertwining between the legal and illegal economy, that forms the *first pillar* of ADM, and the organised crime paradigm, were emphasised.

Such set-up of ADM that stresses the serious and organised crime paradigm, coupled with the fact that the essential tool of cooperation is fixated around and defined by the police and its priorities when addressing labour trafficking, limits understanding

of its embedded nature. As discussed in critical strands of literature (Alvesalo *et al.*, 2006), the emphasis on organised crime, 'crime' and 'crime prevention' in general, and on severe cases and exceptional actors, diverts attention from systemic problems. This is controversial since it lauds the state and supranational actors as neutral or benign 'rescuers', rather than examining how their oversight of labour markets, welfare systems, labour and socio-economic and immigration policies contribute to the problem. Both ADM and the lens of the shadow economy are turned towards fiscal and economic effects of labour exploitation, aiming to protect the businesses and the state. Accordingly, our findings indicate that the familiarity with multi-agency cooperation covers mainly the prevention of economic crimes and not more 'wicked', messy, and time-consuming offences such as human trafficking. This view was reinforced by the interviewees' comments stating that work-related health and safety crimes still seem 'marginal' in their day-to-day responsibilities.

On the other hand, if negotiated and implemented as a multidimensional strategy to extend the arsenal of available interventions against labour trafficking, ADM has potential to improve access to 'labour justice'. In fact, the flex-inspection applied in Confine (2018) and other operationalisations of ADM (Kersten and Roevens, 2015), in which representatives of different stakeholders carry out inspections according to their respective mandates embodies the regulatory pyramid (Braithwaite, 2020) combining coercive policing tools with regulatory instruments. These types of regulatory monitoring activities have proven effective to improve enforcement in the market context (Schell-Busey *et al.*, 2016).

Thus, even though from the perspective of both administrative authorities and law enforcement, understanding of ADM concept may appear less important than dealing with their core responsibilities, becoming more familiar with non-penal frameworks of crime control, and thereby challenging traditional perceptions of what crime control is, has the potential to develop long-term, sustainable regulatory tools when tackling the roots of labour trafficking. To this end, the efforts to widen the nexus between relevant public authorities and to reduce structural siloes in priorities is to be commended. Our participants' familiarity with the concept of shared responsibility (2) and operational elements of the administrative approach (3–5), especially in a conducive political and administrative context, is promising. Now, a shift in perceptions of ADM as criminal justice-oriented approach and redefinition of the approach according to common priorities of relevant stakeholders is needed to overcome conceptual challenges and avoid ambiguity of formalisation. Exploring and filling in the gaps between organizational design of ADM and coordination work on the ground facilitate future developments.

The data of our research, while diverse and fruitful in narrative, was a discretionary sample that we are not attempting to statistically generalise to Finnish or other European authorities. However, as the research was exploratory, probing experiences, we set the stage for further research by identifying the gaps in the execution of ADM. The hurdles experienced by street level officials deserve a broader look to yield solutions especially to the dissenting priorities, the practices of observing possible criminal activity and notifying the network, as well as the legal framework under which the authorities are effectively able to contribute to a more just society.

ORCID iDs

Hanna M Malik [ID] https://orcid.org/0000-0003-1973-1199
Jalo Vatjus-Anttila [ID] https://orcid.org/0000-0001-7312-7289

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