

**Written submission to Ministry of Women and Child Development:
Trafficking of Persons (Prevention, Protection and Rehabilitation) Bill, 2016**

30 June 2016

Anti-Slavery International has been working to address human trafficking and forced and bonded labour in India for many years. Currently, Anti-Slavery International work together with partners in Punjab, Chhattisgarh and Delhi to address trafficking of men, women and children for the purposes of labour/physical exploitation. Anti-Slavery International also work to address trafficking for labour and domestic servitude in India, with a project that spans seven states. Outside of India, Anti-Slavery International have participated in the drafting of prevention of trafficking laws in other countries. Most recently, Anti-Slavery International provided key submissions and input into the *Modern Slavery Act, 2015* in the United Kingdom and the National Referral Mechanism, which refers victims of trafficking to relevant services within the United Kingdom.

EXECUTIVE SUMMARY

We welcome the fact that that Government of India is open to improving the laws and regulations to prevent trafficking of men, women and children in India. The *Trafficking of Persons (Prevention, Protection and Rehabilitation) Bill, 2016* (“the Bill”) is a significant step forward in preventing, protecting and rehabilitating those vulnerable to and affected by human trafficking.

However, the Bill is lacking vital provisions and several clauses require further consideration. We have set out our main concerns in this submission, under headings. Part A of this submission sets out overarching concerns regarding the Bill, whilst Part B sets out concerns and suggestions in relation to specific clauses of the Bill.

In summary, we are concerned that:

- The Bill does not sufficiently address all forms of trafficking: whilst the Bill refers to trafficking of children it does not clearly state or refer to trafficking of persons for labour exploitation. This is the most common form of trafficking in India, and must be included in the law. We note that model laws on trafficking throughout the world all include trafficking for the purposes of exploitation, with exploitation defined to include:
 - Slavery and servitude
 - Forced and bonded labour
 - Sexual exploitation
 - Forced removal of organs
- The Bill is vague and does not provide sufficient detail on the support and rehabilitation of those affected by trafficking and modern slavery, and how the different bodies established in the Bill will operate and exercise their powers. To address trafficking, which often crosses state borders, it is vital that the central

government provides a strong framework to ensure consistent, human rights based approaches to preventing and addressing trafficking.

- The Bill needs to significantly strengthen its human rights based approach, including setting out that the informed consent of persons affected by trafficking is required at each step of the protection, rescue and rehabilitation framework. Persons affected by trafficking and slavery should have the right to all rehabilitation measures available, and the right to an informed choice as to which of these measures they require. For example, a person identified and rescued from a situation of trafficking may require financial assistance, temporary shelter and support, temporary medical care and on-going psychological care and vocational/educational services, but may not wish to access on-going institutional care through Special Homes. Informed consent is critical in this process, to ensure that persons affected by trafficking can control the type of services that they obtain, and are able to exercise freedom and agency.¹
- The Bill does not mention measures to protect and support victims during the criminal justice process, including the provision of legal support, and is unclear as to whether protection homes and other support and protection services to protect victims and witnesses can be available at multiple times to victims (i.e. post-rescue; during statement-taking processes; at trial; after trial).
- The Bill must make it clear that victims of trafficking will not be subject to penalisation or prosecution for illegal acts committed as a direct consequence of being trafficked.
- The Bill does not provide sufficient detail on the regulation of rehabilitation homes and placement agencies – it does not set out what criteria rehabilitation homes and placement agencies must meet, how often they will be inspected and how/when renewal of registration occurs.

PART A: GENERAL ISSUES

Be clear that the Bill covers victims of trafficking for labour exploitation

It is critical that the Bill covers all forms of human trafficking, including trafficking for forced and bonded labour, which affects millions of children and adults in India. Without addressing and providing support for victims of trafficking for forced labour, human trafficking in India will not be comprehensively tackled.

Clarify how Bill operates with existing legislation

In some cases, it is unclear how the draft law operates with some other legislation related to trafficking, such as the *Immoral Traffic Prevention Act*. If the Bill overrides the ITPA, then this should be expressly stated. Additionally, in relation to children, if the *Juvenile Justice Act*, including the new 2015 amendments, along with other relevant legislation including the *Protection of Children from Sexual Offence Act*, is to be followed, this should be expressly stated.

Rights and Protections of Victims and Witnesses: from rescue through to rehabilitation

¹ United States Trafficking in Persons Report 2014, p 11.

The Bill does not mention whether informed consent of the person affected by trafficking and slavery is required prior to undertaking any protection and rehabilitation measures, including in relation to the process of removing a person from a situation of trafficking (rescue). It is unclear how District Anti-Trafficking Committees will decide whether someone is referred to a Protection or Special Home, or how a person affected obtains other forms of support (see Clause 3(1): ‘protection, medical care, psychological assistance, skill development, needs based rehabilitation’). As the Bill is silent, it is assumed that such informed consent and choice is not required, and that it is the decision of the District Anti-Trafficking Committees. This approach is counter to international principles, with experts in the field repeatedly emphasising that victims choices and freedoms must be respected at all stages of service provision – including the right to accept some rehabilitation services and decline others. Persons affected by slavery should be able to make an informed choice, from an array of rehabilitation and support services, which options best support their needs.

Additionally, if a person makes an informed choice to participate in any legal matters relevant to a case of trafficking, provisions must be included to ensure that victim’s feel supported and encouraged to partake in the process. These provisions of support, collectively termed victim protection provisions, can be drawn from existing international principles² and current central government legislation in India.³ It must also be made clear that persons affected by trafficking must not be prosecuted for any illegal acts carried out as a direct consequence of being trafficked.

The Bill should ensure the following:

- ensure that the informed choice of persons affected by trafficking is respected throughout all stages of assistance;
- make arrangements for protection of the victims, their dependents and witnesses against any kind of intimidation or inducement or violence or threat of violence;
- treat victims and witnesses with fairness, respect and in accordance with non-discrimination principles and with due regard to any special need that arises because of victim’s age, gender or other attribute;
- ensure that victims of trafficking are not charged or prosecuted for any illegal acts carried out as a direct consequence of being trafficked;
- to ensure medical processes are carried out in accordance with rules and procedures that respect the dignity, rights and informed choice of the victim;
- to ensure that victims and witnesses participating in legal processes obtain free legal assistance from when first produced before the District Anti-Trafficking Committee and then throughout all legal matters related to the trafficking offence;
- ensure that the same victim/witness rights and protections that are set out under Chapter IVA the *Scheduled Castes and Scheduled Tribes Amendment Act 2015* are provided to victims of trafficking; and
- that persons affected by trafficking can chose NGO, social worker or advocate assistance with representation before the District Anti-Trafficking Committee, and other government bodies and officials.

² Council of Europe Trafficking Directive 2005 and EU Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims.

³ Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Amendment Act 2015

Victim Compensation

The Bill is silent in relation to victim compensation. We recommend the inclusion of a new chapter that confirms that the implementation of the Victim Compensation Scheme, guarantees legal assistance to victims applying for compensation, establishes timeframes for the release of compensation and clarifies that compensation available under different legislation is independent to that available for trafficking.

Independent Oversight

We believe that, in addition to government mechanisms and agencies that implement the legislation, an independent body should be mandated to oversee the implementation of legislation, and to hear appeals about the decisions of District Anti-Trafficking Committees and make binding decisions. It may be that this body can be the Special Court established in this Act – if this is the case, this should be made clear in the revised version of the Bill. International principles recommend independent oversight of anti-trafficking laws and policies.⁴

PART B: SPECIFIC DETAIL ON CHAPTERS OF BILL

Chapter I: Preliminary

(2) Definitions

1. The draft Bill should include a definition of trafficking. As the Preliminary section has already cited the Constitution of India and the Palermo Protocol, the definition of trafficking in persons adopted must conform with these two instruments, as well as the definition set out in s370 of the Indian Penal Code. To comply with the Constitution of India, and the Palermo Protocol, we recommend a very similar definition to trafficking as section in s370, with the addition of forced and bonded labour as a form of exploitation.

We recommend the inclusion of a clause stating:

“trafficking in persons” means:

“the recruitment, transportation, transfer, harbouring or receipt of persons, for the purpose of exploitation, by –

- *Using threats, or*
- *Using force, or any form of coercion, or*
- *By abduction, or*
- *By practicing fraud, or deception, or*
- *By abuse of power, or*

⁴ OHCHR Recommended Principles and Guidelines on Human Rights and Human Trafficking, May 2002, E/2002/68/Add.1. Available at: <http://www.ohchr.org/Documents/Publications/Traffickingen.pdf>

- *By inducement, including the giving or receiving of payments or benefits,*

in order to achieve the consent of any person having control over the person recruited, transported, harboured, transferred or received.

Explanation 1. The expression “exploitation” shall include any act of physical exploitation or any form of sexual exploitation, forced or bonded labour, slavery or practices similar to slavery, servitude, or the forced removal of organs.

Explanation 2. The consent of the victim is immaterial in the determination of trafficking.

2. To provide further clarity in definitions we recommend that the definition of “victim” is amended to the following “*victim*” means: *a person or persons who has been subject to trafficking in persons or attempted trafficking in persons*
3. We recommend the inclusion of a new definition “*attempted trafficking in persons*” – “*attempted trafficking in persons*” means: *any person who intends to carry out trafficking in persons*”
4. The definition of ‘*aftercare*’ should be amended to enable provision to victims who have not been accommodated in institutional special homes – “*aftercare means making provisions for support, financial or otherwise as prescribed by the appropriate Government, to a victim of trafficking*”
5. It is recommended that a new definitions of ‘*dependent*’ is included and shall mean the same as dependent under the *Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Amendment Act 2015*.
6. In relation to the definition of Placement Agency, we recommend that the definition makes clear that the *Inter-State Migrant Workmen Act* still applies.
7. We recommend that aa) is amended to state that “*words and expressions used but not defined in this Act, and defined in other Acts, shall have the meanings respectively assigned to them in those Acts.*”

Chapter II: District Anti-Trafficking Committees

The current Bill does not provide sufficient detail on how District Anti-Trafficking Committees will work to protect and respond to victims of trafficking. Currently the Bill merely sets out that victims shall be produced before the Member Secretary of the District Committee after rescue (the District Officer of the Social Justice or Women and Child

Development Department)⁵ and that the Committee can exercise powers and functions related to “prevention, rescue, protection, medical care, psychological assistance, skill development, needs based rehabilitation”⁶, as prescribed by each state government.

Powers and functions into such vitally important areas – prevention, rescue and rehabilitation – must be set out in the Bill to ensure a human rights based framework to respond to trafficking and modern slavery across the country.

In particular, the Bill needs to clearly address the following key areas of concern:

- a) *The role will District Anti-Trafficking Committees have in relation to rescue of those affected by trafficking:* it is important that any removal of a person from a situation of trafficking is carried out occurs in a safe manner which respects the rights, informed choice and dignity of victims. The consent of the victim should be obtained prior to any action where possible. Along with other actors, accredited social workers trained in trafficking and members of an accredited NGO must participate in cases of removing people from trafficking situations, both before, during and after action.
- b) *The powers that the District Anti-Trafficking Committees and District Members have when victims of trafficking are produced before them under proposed section 4(1):* currently it is unclear what decisions the Committee or Member Secretary can make in relation to persons that are brought before them under clause 4(2). This submission has set out some recommended powers and functions in relation to making decisions in relation to support, rehabilitation and aftercare in Chapter VII and VI below. Paragraph c) below also relates to powers and decisions of the Committee.
- c) *The decision making process of the District Anti-Trafficking Committee:* currently it is unclear as to whether just the Member Secretary that can make decisions as to rescue, protection and rehabilitation, or whether the agreement of other members, and other stakeholders including the victim, is required.

Where decisions are being made about support, protection and rehabilitation, the victim must give their informed consent: a person must not be referred to a Protection Home or Special Home, or be forced to undertake other rehabilitation measures, without their informed consent. An independent and trained NGO or advocate must be called to provide information and advice to the victim, before any decision is made. All rehabilitation and support services must be available to victims of trafficking, both institutional (Protection and Special Homes) and non-institutional (financial assistance, medical care, psychological assistance, skill development and other needs based rehabilitation). This is necessary to ensure that those who do not wish to stay within an institutional environment, can still access funds and other services to prevent re-trafficking. This is also addressed in Chapter VII below.

The Bill should also set out timeframes for decisions and action to be carried out.

⁵ Clause 4(1)

⁶ Clause 3(1)

Similarly, it must be clear when a person will be allowed to leave a Protection Home and Special Home. The definition of ‘aftercare’ in the Bill implies that the District Anti-Trafficking Committee must provide an opinion that the person is ready to reintegrate into mainstream society. It must be clearly articulated that people affected by trafficking and slavery will be able to access support services, and will be free to leave them at their will. One of the key issues with the present system is that, in some cases, trafficking victims have been detained in rehabilitation centres against their consent. According to experience from around the world, such environments do not support a victim’s sense of agency and confinement and isolation can potential re-traumatise trafficking victims.⁷

- d) *Appeal of decision*: it is recommended that a decision of a District Anti-Trafficking Committee can be appealed to the Special Court referred to in this Bill or other independent body.
- e) District Committees should be accredited/registered so that they are trained to respond appropriately, sensitively and with respect to victims of trafficking.
- f) Other functions of District Anti-Trafficking Committees should be set out: such as collection of data to be collated by the state anti-trafficking committees and awareness raising.

In order to have an effective, coordinated and human rights based national, state and district response to trafficking and slavery, the Bill must set out a clear framework of how government agencies will undertake these measures to prevent and respond to trafficking. This is particularly important as trafficking and modern slavery crimes cross district and state borders within India, and the framework established in the central government law must be clear and effective – so that rules established by states and districts operate within the same framework and reduce confusion.

Referral of children

It is also not clear how district anti-trafficking committees will operate with current Child Welfare Committees. It is recommended that the Bill clearly states in section 4:

- Any child victim of trafficking should be brought before the Child Welfare Committee, in accordance with the *Juvenile Justice Act 2015*;
- Where a child is brought before the District Anti-Trafficking Committee, the Committee should ensure that the child is brought before the Child Welfare Committee within the shortest amount of time, and not more than the timeframe stipulated in the *Juvenile Justice Act 2015*. A trained female social worker will accompany the child to the Child Welfare Committee.

Members of District Anti-Trafficking Committee

Clause 4: It is recommended that, in addition to the members set out in the current clause 4, the following members should be included: a member from the Scheduled Castes and

⁷ United States Trafficking in Persons Report 2014, p 11.

Scheduled Tribes; and a member from the Health Department; member from the Labour Department.

Chapter III: State Anti-Trafficking Committees

Similar to the District Anti-Trafficking Committees, the Bill establishes that each state must have an 'Anti-Trafficking Committee' but does not provide any detail into what these committees must do, apart from stating that oversee implementation of the Act and advise on the prevention of trafficking and rehabilitation of victims. No other detail is provided, and it is unclear what powers and functions the State Anti-Trafficking Committees will have. More detail needs to be provided.

It is recommended that one function includes the maintenance of collated, anonymised data on trafficking, as collected by District Anti-Trafficking Committees. This is important to provide a more accurate picture of those affected by trafficking, source and destination states and forms of trafficking and exploitation. This information is critical in improving the response to trafficking.

Chapter IV: Central Anti-Trafficking Advisory Board

The Central Anti-Trafficking Advisory Board must include the Ministry of Labour and Employment, which is vital in addressing forced and bonded labour and labour trafficking. Membership of this Board should be detailed, including how people are selected, to ensure proper process and transparency.

Additionally, once again, the functions and powers of this Board must be detailed so it is clear how this body will oversee implementation of the Act and what its powers are.

Chapter V: Special Agency

There is no detail provided on the Special Agency that the government will establish, save for stating that their purpose is the 'investigation of offences under the provisions of the Act'. It is also unclear how the Special Agency will work with other specialised agencies within the government, such as the District and Anti-Human Trafficking Units of the police. It is unclear if the Special Agency will focus primarily on regulating rehabilitation homes and placement agencies, and on the investigation of offences under this Bill, or if it will be involved in the investigation of trafficking offences under other legislation, such as the Indian Penal Code.

It is recommended that the Bill:

- clarifies the purpose, powers and functions of the Special Agency, at least as a framework, to then provide further detail in the Rules;
- provides that the Special Agency must submit the Final Report of the investigation within 90 days of registration of the First Information Report; and
- provides that trial should be completed within 3 months from the time of submitting the Final Report.

Chapter VI: Support Services

This chapter currently only relates to institutional support services – protection homes and special homes. Non-institutional support services should also be included in the Bill, such as financial support, medical and psychological care, vocational/skills training and education. It should be clearly stipulated in the Bill that such support will be available from the time of identification and removal (rescue) of people affected by slavery. Support and rehabilitation services should be provided whether or not a person chooses to stay within a Protection or Special Home, and must be provided from the time of removal/rescue from a situation of trafficking (it should not have to wait for an outcome of a court).

As this chapter just relates to institutional support services, which is just one type of support that can be provided, this chapter should be renamed ‘Institutional Support Services’. Chapter VII should be renamed ‘Non-Institutional Support Services’. Alternatively, the chapters can be combined and current clause 11 be moved to precede current clause 8. Our recommendations in relation to non-institutional support services are detailed below under the heading Chapter VII: Rehabilitation and Social Integration.

Section 8. Protection Homes: As stated earlier, it is not clear how people will be referred to these services and how it will be decided that people can leave these services. Furthermore, it is unclear if people affected by slavery and trafficking will be able to access protection homes and different stages – so be able to leave a protection home, and then return to it at a later date (for example, when they return to an area to take part in legal proceedings, or if they feel at a later date that they need protection).

It is recommended that the Bill sets out the procedure for referral and access to Protection Homes, either in this Chapter or Chapter II on District Anti-Trafficking Committees, including making it clear that:

- a) Adult victims of trafficking can decide whether to access institutional assistance (either Protection or Special Homes) or non-institutional support services, including whether to leave institutional services;
- b) In the case of unaccompanied children, the process specified in Juvenile Justice Act 2015 is to be followed.

Section 8(2) It is recommended that Protection Homes also provide legal services to persons affected by trafficking, in addition to shelter, food, clothing, counselling and medical care and other services.

Section 9. Special Homes: The section states that Special Homes will provide long-term institutional support, but provides no detail on what this support will be and how it will be provided, what are basic standards for special homes. It is critical that more detail on the requirements for special homes are set out; including what kind of support services will be provided in each special home.

Section 10. Registration of Homes: Whilst we support the registration and regulation of homes that are providing support to those affected by trafficking and slavery, again we believe that there should be more clarity on how both the Protection Homes and Special Homes will be run, and therefore the criteria against how they will be regulated. It is recommended that the Bill sets out what the registration of Homes will require (how will

homes ensure that they will be successfully registered), whether registration will also mean regular monitoring and inspection and whether registration will need to be renewed (and therefore re-checked) at regular intervals, and which body will oversee this monitoring and regulation

We note that the Justice Verma Committee found that they had “*no doubt of the sheer abuse of these institutions. In view of the above, we recommend that in each of the States, all the children homes, observation homes, juvenile homes and women's protective homes be placed under the legal guardianship of the High Court. We would also suggest that a Committee of Judges be formed which could undertake surprise inspections to make sure that the children are living in a healthy atmosphere. The said Committee of Judges may also constitute a Board of psychiatrists who would prescribe detailed psychotherapy for the children. Thereafter, aptitudinal tests must be undertaken and the children must also be reintegrated with their families on the one hand, and normal educational possibilities for mainstreaming should be made available.*” (see pages 196-197)

Chapter VII: Rehabilitation and Social Integration

Section 11(1) states that each government can decide what rehabilitation and support to provide, including aftercare. Out of the three terms ‘rehabilitation, support and aftercare’, the only one that is defined in the Bill is aftercare. However the definition of aftercare included in the Bill suggests that it will only be available to those that have stayed in and then left long-term institutional care – the Special Homes. This is problematic: rehabilitation, support and aftercare must be provided to all victims of trafficking, regardless as to whether they chose to stay within an institutional care home.

As stated above, it is strongly recommend that non-institutional rehabilitation, support and aftercare services be included in the Bill, including medical and psychological care, financial assistance, skill development and education. It should be clearly stipulated in the Bill that such support will be available from when a person is brought before the District Anti-Trafficking Committee, and can be provided without a person having to stay within a Protection or Special Home, or without any finding by a court.

Specifically, we recommend that:

- a) When a person is produced before the District Anti-Trafficking Committee in accordance with clause 4(1), the District Anti-Trafficking Committee should provide the following immediate rehabilitation, support and aftercare: adequate financial assistance for those affected and dependants; legal aid; medical care; psychological care; the option to obtain shelter, food and other assistance at a registered Protection Home.
- b) District Anti-Trafficking Committees must also offer the following rehabilitation, support and aftercare options to persons affected by trafficking, within a stipulated timeframe: education, skill development, trauma recovery and livelihood assistance.
- c) The person affected by trafficking can choose to access all or any of the above services, in consultation with the District Anti-Trafficking Committee.
- d) Amend the definition of aftercare so it is clear that it is available to those affected by trafficking and slavery that access short-term institutional support, such as the

Protection Homes, or that do not access institutional support at all but prefer to access rehabilitation, support and aftercare outside of an institutional setting.

Recommended new chapter: Rights of Victims and Witnesses

Our experience shows that legal cases are much more likely to be successful if the victim of the offence provides evidence to support the prosecutor's case. In order to achieve this, the Bill must include provisions which would ensure that victims feel supported and encouraged to partake in the criminal process against their traffickers. These provisions of support, collectively termed victim protection provisions⁸. Within our projects, victims are frequently intimidated and threatened to withdraw legal action and cases; right from the very first moment of when they seek assistance to be removed from their situation of trafficking. In addition to intimidation and threats, victims and witnesses also are subject to counter criminal cases and are sometimes subject to violence.

It is strongly recommended that the Bill insert a new chapter on the Rights of Victims and Witnesses, drawing heavily from Chapter IVA of the Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act 2015. It is recommended that the provisions for victim and witness protection related to the Special Court (as set out in the SC/ST(POA) Amendment Act) also be incorporated into this Bill, either in this new chapter on Rights and Victims of Witnesses, or in Chapter XI: Special Courts and Powers of Special Courts.

It is critical that this new chapter also includes a clause that states that victims of trafficking must not be penalised or prosecuted for any illegal acts carried out as a direct consequence of being trafficked.

Chapter VIII: Registration of Placement Agencies

It should be made clear that this Chapter does not override the provisions of the *Inter-State Migrant Workmen Act*.

For the purposes of co-ordination between different states in India, this Bill should set out a detailed framework of:

- The role and services of Placement Agencies
- The criteria against which Placement Agencies will be registered
- The process for the regulation of Placement Agencies, including specifying the authority responsible for regulation and monitoring of Placement Agencies

Chapter IX: Offences and Penalties

The Bill should make clear that offences in other legislation related to trafficking as defined in this submission, shall be read with the offences defined in this Act. This includes offences committed by the police or other agencies.

⁸ Council of Europe Trafficking Directive 2005 and EU Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims.

It is recommended that Clause 18, General Penalty, be amended to reflect section 4 of the Scheduled Castes and Schedule Tribes (Prevention of Atrocities) Amendment Act 2015 – “Whoever, being a public servant, willfully neglects duties required to be performed by him under this Act and the rules made thereafter, shall be punishable with imprisonment for a term which shall not be less than six months, but which can be extended to one year.”

Suggested new chapter: Victim Compensation

It is recommended that the following sections be included:

- The relevant government will effectively implement the Victim Compensation Scheme set out in the *Criminal Procedure Code* and continue support to victims of trafficking.
- The relevant government will modify State Victim Compensation Scheme in alignment to Central Victims Compensation Fund Scheme Guidelines issued in 2015.
- Victims wishing to apply for compensation shall be eligible to obtain free legal assistance through established government mechanisms.
- Timeframes for release of compensation shall be set-out.
- The victim compensation mentioned under this Act shall be independent of the compensation amount provided to the victims of offences under any other Act.

Chapter XI: Special Courts and Powers of Special Courts

It is recommended that victim and witness protection measures be added to this chapter of the Bill as set out in the *SC/ST(POA) Amendment Act 2015*.

26. Special Public Prosecutors: It is recommended that the following amendments to this clause be made:

(3) A person shall not be qualified to be appointed as Special Public Prosecutor under this section unless he/she possesses ten years active practice as an Advocate before a Court of Session, having a good record of successful prosecutions, and after satisfactorily completing a course on human trafficking law and procedure.

It is recommended that, similar to other legislation in India, that the a new section is inserted that gives the right to the victim to choose a private advocate to represent his/her interests, which will be provided pro bono by the relevant Government.

Chapter XII: Miscellaneous

Section 28: Investigating Officer

The Bill should provide more detail in relation to how the Investigating Officer operates within the currently established Anti-Human Trafficking Units.

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