



Submission on the Appraisal of the United Nations Global Plan of Action to Combat Trafficking in Persons (GPA) - 2021

The regular appraisal of the Global Plan of Action to Combat Trafficking in Persons, on a four-yearly basis, is an opportunity to acknowledge achievements and reflect on existing gaps, both in implementation and scope, and consequently on the way forward in the fight against trafficking in persons.

The Inter-agency Coordination Group against Trafficking in Persons (ICAT) welcomes the inclusion of a Political Declaration in this appraisal process. ICAT, the lead UN-mandated mechanism comprising of 30 entities is tasked with ensuring coordination and coherence across the international system to facilitate a holistic and comprehensive approach to preventing and combating trafficking in persons, including protection and support for victims and survivors of trafficking. ICAT wishes to offer its support to States in the process of negotiating this Political Declaration through the below analysis, suggestions, and recommendations.

Around the world, 178 States have ratified the *UN Trafficking in Persons Protocol*, with almost all reporting the enactment of national legislation that criminalizes trafficking in persons, a core obligation of the Protocol. A *Mechanism for the Review of the Implementation of the United Nations Convention against Transnational Organized Crime and the Protocols thereto* was also established in 2018, a milestone for international commitment to evaluate progress at a national level.¹ Since the last appraisal, States also adopted the *Global Compact on Safe, Orderly and Regular Migration* ('GCM') and the *Global Compact on Refugees* ('GCR') in 2018, committing themselves to implement broad strategies to address challenges related to human mobility, including by providing support to migrants in a situation of vulnerability and victims of trafficking in particular (Objective 10, GCM) and acknowledge the importance of protection and support of trafficking victims (para. 60, GCR). These examples illustrate the efforts undertaken by States to prevent and eradicate trafficking in persons through a coherent approach and by tackling the crime from different angles.

In the context of the negotiation of a Political Declaration and States' reflection of their responses to trafficking in persons, ICAT seeks to contribute to States' efforts by recommending the inclusion of six priority areas, as foundational pillars to improve current, global anti-trafficking responses, based on and advancing ICAT's recent *Analytical Review*, jointly undertaken, endorsed and published by ICAT's membership in December 2020.

¹The Mechanism was established by the Conference of the Parties to the UN Convention against Transnational Organized Crime in [resolution 9/1](#).

01 Addressing the core drivers – a shift towards reducing vulnerability

Root causes and the impact of crises

As the COVID-19 pandemic has brought to the fore, crisis situations exacerbate the risks of trafficking and related practices of those already most vulnerable through disruption of economic activities and livelihood options, as well as family and social networks. Further to creating new challenges, a crisis – whether related to a pandemic, climate change, natural disasters, conflict, forced displacement or other causes – aggravates the underlying issues which make people vulnerable to trafficking² and can create new factors of vulnerability due to social disruption and weakening of institutions. COVID-19 and its consequences are leaving an increasing number of people at risk of being trafficked. Re-victimization of trafficking survivors is a pervasive risk, as survivors struggle for access to justice, services, livelihoods and family reunification.

In conflict settings, internally displaced persons (IDPs), refugees and migrants, may be in a situation of particular vulnerability, as well as individuals belonging to diverse national, ethnic or religious minorities, particularly women and girls. Conflict is one of the most important drivers of global forced migration and displacement, where the use of trafficking in women and children for the purpose of sexual exploitation, as well as to instil fear in local populations, is common.

In the world, one in three identified trafficking victims is a child, but this figure is much higher in low-income countries.³ Children may become victims of trafficking as they escape violence, conflict, a dysfunctional family, or try to reunify with family members. The difficulty in maintaining unity for families on the move is an important risk factor of child trafficking.⁴ During any crisis, children are at high risk of dropping out of school as the economic situation of families deteriorates and/or facilities are destroyed, closed or used for other purposes, pushing children into labour, begging, recruitment by criminal groups, child marriage or unaccompanied migration.

Trafficking in women and girls for the purpose of sexual exploitation continues to be the most detected form of trafficking in persons. The predominance of trafficking in women and girls for the purpose of sexual exploitation, domestic servitude and forced marriage is attributable to systemic gender inequality and illustrates that trafficking is still highly gendered, from the root causes that make individuals more vulnerable to exploitation, to the measures and policies put in place to address the crime. The objectification of women, and the sexualization of girls are among factors that generate demand for sexual exploitation.

In the 2017 Political Declaration, States committed to address the social, economic, cultural, political and other factors that make people vulnerable to trafficking in persons. ICAT recommends the inclusion in the Political Declaration, in 2021, of a commitment to the following concrete actions by States:

- To launch educational, socio-economic, development and peace-building initiatives to address the underlying social and structural inequalities that enable trafficking to persist, such as poverty, gender inequality, discrimination and corruption.
- To implement legislative, institutional and policy changes reinforcing labour and social rights, as well as access to education, to address the short- and long-term impact of crises as well as the vulnerabilities increasing risks of trafficking in persons.
- To develop international standards and guidelines on anti-trafficking measures in humanitarian crises and post-crisis settings, building upon the existing international criminal, human rights, humanitarian, labour and refugee standards and norms.
- To address the impact of COVID-19 on victims of trafficking by prioritizing support to initiatives aimed at identifying and closing gaps in protection, particularly in access to primary health care, counseling, legal aid, shelter and psychosocial support.

² Underlying factors, such as, inter alia, the exclusion from rights and access to services, the lack of access to safe pathways for migration, inequality and discrimination become more visible. See [OHCHR including Guidance Note on CEDAW and COVID-19](#), 2020.

³ UNODC, [Global Report on Trafficking in Persons 2020](#), 2020.

⁴ See for example ICAT, [Issue Brief 6 Trafficking in Children](#), 2018. When a child is alone, it increases their vulnerability to trafficking, particularly when these factors are coupled with inadequate education, healthcare, and social protection systems, statelessness, poverty, discrimination and other forms of organized crime.

- To develop and strengthen national referral mechanisms (NRMs) or equivalent systems, essential to the functioning of anti-trafficking frameworks nationally, especially during states of emergency. These systems should be grounded in a human rights-based, non-discriminatory, gender-sensitive, trauma-informed and victim and survivor-centred approach. They should include, at a minimum, national coordination and independent monitoring functions, relevant service providers, and multidisciplinary cooperation across government institutions and stakeholders. They should also include specialized referral procedures for children.
- To include trafficking responses in national and local socio-economic recovery post-crisis plans, through the explicit definition of a national anti-trafficking coordination mechanism during a state of emergency and the clear delineation of related responsibilities and procedures.
- To provide safe, orderly and regular migration pathways, including through mobility agreements between countries and regions, to minimize the risks of trafficking in persons.
- To guarantee victims the right to seek and enjoy asylum and be granted international protection where they meet the criteria of the 1951 Convention relating to the Status of Refugees, and take due account of their trafficking experience in a request for international protection.⁵
- To consistently uphold the principle of non-refoulement, as a norm of customary international law binding all States, including parties and non-parties to specific refugee or human rights instruments, and refrain from returning or repatriating a victim of trafficking where there is a risk that the person would be re-trafficked on return, or where their return would not be safe and sustainable, exposing them to risks of persecution or serious human rights violations.
- To address gender-based and other forms of discrimination affecting women and girls and LGBTQI+ persons, which are exacerbated during crises, and can be elements fostering trafficking for sexual exploitation, forced marriage, forced criminality, and labour exploitation, including domestic servitude.

02 Discouraging the demand

Discouraging demand for services and goods provided or produced by trafficking victims continues to be an area lacking attention in the global anti-trafficking response.⁶ Article 9 of the trafficking in Persons Protocol requires States to take measures to “discourage the demand that fosters all forms of exploitation of persons [...] that leads to trafficking”. This establishes a concept of demand that moves beyond only the “demand for trafficking” to address demand that encourages exploitation that in turn leads to trafficking. It creates an obligation to discourage demand that extends beyond the knowing use of trafficking victims.

Demand can encompass many aspects. In the context of globalized economies, for example, demand for cheap labour, coupled with a demand for cheaper products and goods continues to fuel trafficking in persons. There is little doubt that ever-expanding global supply chains of multinational businesses and corporations in different industries remain associated with the presence of labour exploitation and trafficking in persons,

including of children. Demand for cheap labour has also increased the number of migrants falling prey to traffickers, especially in the agricultural sector. A comprehensive strategy needs to address the demand that fosters all forms of exploitation, including both sexual and labour exploitation.

It is also critical for the UN System to eliminate trafficking in persons in its procurement. To this end, ICAT is working with the UN Procurement Network to combat human trafficking and forced labour in UN supply chains. Before the High-level event of the appraisal in November, ICAT will launch a policy brief on the role of public procurement in preventing trafficking for forced labour.

Finally, ICAT continues to advocate for gender-transformative prevention measures through joint advocacy campaigns and outreach, to reduce demand and address the root causes of sexual exploitation to eradicate trafficking in women and girls in the long term.

⁵ Guidelines on International Protection No. 7: the application of Article 1(A)2 of the 1951 Convention and/or 1967 Protocol relating to the Status of Refugees to victims of trafficking or persons at risk of being trafficked.

⁶ See ICMPD research conducted in the framework of the project “[Addressing Demand in Anti-Trafficking Efforts and Policies](#)”.

In 2017, States committed to intensify efforts to prevent and address the demand that fosters trafficking. ICAT recommends the inclusion in the Political Declaration, in 2021, of a commitment to the following concrete actions by States:

- To strengthen and ensure the implementation of legislation on labour rights, including by enhancing and fully resourcing the role of labour inspectorates, and establishing firewalls between immigration checks and labour inspections. Regulations protecting the rights of domestic workers should be adopted or strengthened.
- To ensure that all actors in global supply chains, including intermediaries, who purchase or benefit from the labour of trafficking victims are held accountable, including with sufficiently stringent sanctions, by adopting and enforcing appropriate legislation and practices.
- To support ethical businesses who implement codes of conduct with continuous monitoring based on worker participation in compliance assessment mechanisms.
- To more coherently, decisively and uniformly apply sustainable procurement practices, including by ensuring that companies that receive government contracts and benefit from government procurement are able to demonstrate genuine results in terms of labour rights protection, including in their supply chains. These might include evidence that their subcontractors and service providers pay fair wages and bear recruitment costs. States should exclude from procurement procedures those companies that fail to meet their obligations.
- To establish legislation on mandatory human-rights due diligence, requiring companies to disclose not only the action taken to prevent and eradicate exploitation from their supply chains, but also the specific and verifiable results achieved. Companies should be legally obliged to identify risk and adopt plans to minimize them and should be held liable for damages if they have not complied with such requirements.
- To discourage the demand that fosters the sexual exploitation particularly of women and girls by promoting educational campaigns and active policies addressing the unequal social and economic structures, norms and practices that perpetuate gender inequality and make women and girls disproportionately vulnerable to trafficking for the purposes of sexual exploitation.
- To work with Internet service providers, credit-card companies, banks, and other institutions, to prevent the misuse of the Internet for sexual exploitation and disrupt traditional payment methods, thus reducing profitability, and also address the emerging use of cryptocurrencies.
- To draw from the prevention of violence field, to incorporate work on changing harmful masculinities and social norms that promote the commodification and objectification of women and children and the idea of men's entitlements to women's bodies, and thereby reduce demand for trafficking for the purpose of sexual exploitation.
- To address the nexus between online violence, women's objectification in the media and its linkages to pornography, including trafficking for the purpose of pornography production and child sexual abuse materials.

03 Ensuring a rights-based and victim-centred approach

Several factors contribute to ongoing shortcomings in the effectiveness of protection measures, posing obstacles to access to justice, remedies,⁷ assistance and support for the rehabilitation and social inclusion of victims and survivors.⁸ Although victims of trafficking should be given access to protection schemes, unconditionally and without discrimination, and always be entitled to seek to be recognized as eligible for international protection, the application of these

principles, in reality, is uneven. The principle of non-punishment is key to the recognition of trafficking in persons as a serious human rights violation. The principle seeks to ensure that a victim of trafficking is not punished for unlawful acts committed as a consequence of being trafficked. Punishment of a victim marks a rupture with the commitments made by States to recognise the priority of victims' rights to assistance, protection, and to effective remedies. Punishment also

⁷ For an analysis of the impact of the pandemic on the access to justice for victims of trafficking, see ICAT event: [COVID-19 limits road to justice for victims of human trafficking](#), 2020.

⁸ See also United Nations, [First decade of the mandate of the Special Rapporteur on trafficking in persons, especially women and children](#), 2014.

undermines the fight to combat impunity for trafficking in persons as it targets victims rather than perpetrators. Yet, the principle is not universally applied. Too often, victims are treated as suspects and offenders. Even when victims of trafficking are identified, initiatives to combat trafficking often prioritize prosecution of perpetrators at the expense of victims' protection. Furthermore, trafficking victims unjustly penalized for illegal acts committed in connection with their victimization should be able to access remedies, such as expunging of criminal records.

These issues are particular severe for child survivors. In too many contexts, the internationally recognized definition of child trafficking in the Trafficking in Persons Protocol⁹ is inconsistently applied in national legislation and even less so in practice. A specific challenge is the lack of sustainable solutions for child victims, including long-term assistance, rehabilitation, and protection. Child protection systems remain under-resourced, with a lack of legal guardians and alternative care arrangements.¹⁰

The intersection of disability and human trafficking is an area that has been neglected in law, policy and practice.

The Committee on the Rights of Persons with Disabilities has highlighted the impact of harmful stereotypes, discrimination and lack of procedural and reasonable accommodations on access to justice and to remedies for persons with disabilities. States are required to ensure non-discrimination and disability inclusion in all anti-trafficking measures, including in ensuring the non-punishment of trafficked persons with disabilities. Action is particularly urgent where persons with disabilities are at heightened risk of exploitation, such as for the purpose of forced criminality.

A rights-based, child and gender-sensitive approach in protecting victims of trafficking entails more systematic efforts in upholding and developing the principle of non-punishment of victims¹¹, but also in ensuring compensation, remedies and social inclusion.

Investigations, prosecutions and sentencing should systematically contain a human rights-based and gender-sensitive approach. This is critical to ultimately address the current impunity of perpetrators, to facilitate victim's access to justice and to ensure accountability. Survivors also need to be actively involved in the design of policies.

In 2017, States called for full respect of the human rights of victims and survivors. ICAT recommends the inclusion in the Political Declaration, in 2021, of a commitment to the following concrete actions by States:

- To establish means for the early identification of victims, based on confidential interviews with people at risk, including migrants, refugees and asylum seekers, in places of first arrival.
- To provide effective access of victims to justice and remedies and promote the exchange of good practices amongst States on compensation for victims.
- To ensure that access to assistance is not conditional on participation in criminal proceedings.
- To give effect to the principle of non-punishment for victims of trafficking in a clear, uniform, child- and gender-sensitive manner. The principle must apply to any unlawful activity carried out by a trafficked person as a direct consequence of their trafficking situation, regardless of the gravity or seriousness of the offence committed, as well as to all to all types of punishment, including criminal, civil, administrative and immigration offences, or other forms of punishment, such as arbitrary deprivation of nationality, denial of consular assistance or repatriation, exclusion from refugee status or other forms of international protection and family separation, any situation of deprivation of liberty, including immigration detention and detention pending removal, transfer or return proceedings.
- To apply the principle of non-punishment without discrimination to all trafficked persons, including to trafficked persons seeking asylum or other forms of international protection.
- To ensure equal protection of the law and equality before the law in all anti-trafficking measures. States should take all appropriate steps to ensure non-discrimination on the basis of disability and ensure that reasonable accommodation is provided, including the provision of procedural and age-appropriate accommodations, to facilitate

⁹ Child trafficking does not require a means. Thus, trafficking occurs when children are subjected to an act of trafficking for purpose of exploitation. See UN General Assembly, [Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime](#), 2000, 3(c).

¹⁰ See further [ICAT, Issue Brief 6 Trafficking in Children](#), 2018.

¹¹ See further [ICAT, Issue Brief 8 Non-Punishment of Victims of Trafficking](#), 2019. See also Human Rights Council, [Implementation of the non-punishment principle: Report of the Special Rapporteur on trafficking in persons, especially women and children, Siobhán Mullally](#), 2021, A/HRC/47/34.

effective access to justice and the participation of trafficked persons with disabilities in all legal proceedings, including identification procedures and at the investigative and other preliminary stages.

- To establish protection pathways to regular migration status and long-term residence based on humanitarian and human rights protection grounds, including effective legal pathways for entry, asylum, stay (regularization) and family reunification for victims of trafficking.
- To ensure that all decisions in child trafficking cases prioritize and uphold the best interests of the child at all stages and ensure that the lower threshold required to constitute child trafficking, as per the Trafficking in Persons Protocol, is consistently translated into national law and practice.

04 Holding traffickers accountable

When trafficking in persons occurs transnationally, differences in legal systems can hamper the gathering and sharing of evidence and intelligence. Furthermore, identifying and prosecuting the full chain of perpetrators operating across borders may be particularly difficult. In many instances, only low-level criminals at the end of the exploitation chains are prosecuted.¹² Victims, especially migrant victims, are rarely able or willing to report their exploitation to authorities due to, for example, lack of trust, fear of being deported or facing criminal charges for acts they were compelled to commit while being trafficked, or lack of available support services that meet their needs. Prosecutorial strategies too often solely rely upon the testimony of victims who risk further exposure to trauma.

Further to these challenges, a lack of experience and knowledge among responders has often resulted in trafficking crimes being prosecuted under less severe offences to secure convictions.¹³ Some countries lack financial resources to provide the necessary training or

technological tools that can help in complex investigations. Political will to identify and make such resources available may also be relatively limited in some countries and financial means allocated to addressing other crime.¹⁴ A low level of global prosecutions and convictions continues to be observed.

The use of the Internet and other technologies, particularly in the COVID-19 context, has been integrated into the business model of traffickers. It facilitates the luring of victims into sexual exploitation, forced labour, forced criminality and other purposes, strengthens the control of traffickers over victims and often multiplies the avenues of exploitation. The Internet has become an ideal space for traffickers to recruit and exploit victims in faster and more cost-effective ways, while enabling increased anonymity and the possibility to utilise and store materials discreetly. Online sexual exploitation has been rampant for years, but the pandemic has exacerbated the trend with a spike of cases of child trafficking for online sexual exploitation.¹⁵

In 2017, States committed to enhancing the capacity of criminal justice systems to respond to trafficking in persons. ICAT recommends the inclusion in the Political Declaration, in 2021, of a commitment to the following concrete actions by States:

- To ensure sustained and systematised capacity-building for all relevant criminal justice actors, with a human rights-based, victim-centred, trauma-informed, child- and gender-sensitive approach to anti-trafficking responses.
- To increase informal information-sharing, the use of liaison functions, and the development of specialised regional and inter-regional networks of practitioners.

¹² UNODC, [Evidential Issues in Trafficking in Persons Cases: Case Digest](#), 2017, pp. 125–126.

¹³ UNODC, [Best practices in joint investigations and specialized prosecutions: Background paper](#), 2020, CTOC/COP/WG.4/2020/3, p. 7.

¹⁴ See UNODC, [Challenges to an effective criminal justice response](#).

¹⁵ [UN Women – OSCE-ODIHR Guidance](#), 2020, p. 6. See also: UNICEF, [COVID-19 and its implications for protecting children online](#), 2020. Note: There are many different forms of “online child sexual exploitation” and circumstances leading up to exploitation. Not all would fall within the trafficking definition of the [Trafficking in Persons Protocol](#).

- To routinely undertake financial investigations to provide additional evidence for courts to consider and confiscation measures to secure assets to compensate victims. To foster proactive parallel financial investigations of illicit monetary or financial flows associated with trafficking, and not focusing solely on the initial matter of exploitation and those directly responsible for it, when investigating and prosecuting trafficking in persons to trace, freeze, and confiscate proceeds acquired through this crime.
- To effectively apply technological tools in the identification of traffickers, in strict compliance with human rights and privacy safeguards and in partnerships with the private sector.
- To undertake evidence-based prosecutions, including through the use of e-evidence, to avoid relying solely on victims' testimony.

05 Building the evidence base

There is a clear understanding that the development of effective anti-trafficking policies and programmes requires a solid evidence base to map and monitor the crime and its dynamics. Despite general progress in the collection and analysis of data and the development of several initiatives at national, regional and international levels, significant gaps remain, including in the management of data, the standardization and uniformity of collection across regions and countries, gender and age disaggregation and the availability and accessibility of such data and its utilization to inform different interventions and policies.

Furthermore, sufficiently sophisticated databases to process complex information on a large scale are expensive to create and maintain. Governments and organizations often struggle to find adequate resources

to develop appropriate technological tools and secure the required infrastructure and expertise to cover all the different components of trafficking data. Moreover, discrepancies in legal definitions and in the collection of data at the national level may cause divergent results in the way trafficking cases are classified and how data is collected and shared.

Some principles should be observed in any data collection exercise, such as ensuring safety, privacy and confidentiality of victims and of the data collected from them, implementing the “do no harm” principle, ensuring consent and allowing for two-way feedback to survivors on the research, as well as properly training research and investigation officials on ethical and safety principles.¹⁶ In the case of children, safeguards around consent and safeguarding need to be maintained.

In 2017, States acknowledged the need for improved data collection and analysis. ICAT recommends the inclusion in the Political Declaration, in 2021, of a commitment to the following concrete actions by States:

- To proactively refine and adjust national data collection methodologies for more tailored and comparable qualitative and quantitative measurements on the types of exploitation occurring, and the means used by traffickers, disaggregated by gender and age.
- To collect data on and evaluate early identification and support programmes, as well as long term social inclusion measures, including the effectiveness of national and local level referral mechanisms in linking the identification of victims to the provision of early and long-term support for all victims of trafficking.
- To collect gender- and age-disaggregated data on, monitor, and analyse trafficking and exploitation in conflict and humanitarian crises such as the COVID-19 pandemic, to strengthen the evidence base and inform advocacy, policy development, and programming.

¹⁶ UN Women and WHO: [Violence Against Women and Girls Data Collection during COVID-19](#), 2020.

- To conduct systematic and comprehensive needs assessments before designing anti-trafficking interventions covering, inter alia, the needs for capacity-building, awareness-raising and protection.
- To utilize the *ICAT Toolkit for Guidance in Designing and Evaluating Counter-Trafficking Programmes* as a common framework for aligning activities, defining and assessing progress, and building a robust and shared evidence-base of effective anti-trafficking programs and practices.
- To actively promote the uptake and dissemination of new trafficking data, research and knowledge products among policymakers, practitioners and other stakeholders.

06 Systematizing cooperation and multi-stakeholder partnerships

The concept of multi-stakeholder partnerships has seen progress and is widely considered essential to effectively address trafficking in persons. Due to the multi-faceted nature of trafficking, effective cooperation among relevant anti-trafficking responders, such as law enforcement agencies, financial investigation and cybercrime units, labour inspectors, specialized prosecutors, migration and child protection authorities, health and social care providers, trade unions and civil society organizations, has gained growing traction. As some example, this month, in July 2021, ICAT has launched a global mapping of the mandates, activities, expertise and resources of ICAT entities as a tool to foster a coordinated approach among relevant stakeholders.

Public-private partnerships have also emerged with regards to the identification and mitigation of the risks

of trafficking in persons in business operations, including global supply chains. Partnering with civil society organizations, and in particular, survivor-led entities, is essential to effectively respond to trafficking. Strengthening partnerships between governments and civil society organizations is key to ensure appropriate assistance to victims, including by delivering gender- and child-sensitive, as well as victim-centred assistance to victims.¹⁷

Partnerships between governments and information technology companies, including emerging start-ups, are essential to leverage the use of technologies against their misuse by traffickers, and should be further developed.¹⁸ Likewise, partnerships with financial sector actors is crucial to conduct effective financial investigations into trafficking cases.

In 2017, States acknowledged the importance of partnerships in responding to trafficking in persons. ICAT recommends the inclusion in the Political Declaration, in 2021, of a commitment to the following actions by States:

- To promote high-level cross-border cooperation in the eradication of trafficking in persons, including international police cooperation and judicial cooperation.
- To partner with and include the perspective and voices of survivors particularly in the design of anti-trafficking prevention and protection measures, including through the establishment of dedicated advisory councils at the national level for policy and programme development.
- To allocate adequate resources and support to front-line professionals and organizations providing assistance and other essential services to victims and include survivor-led organizations in the design and implementation of related anti-trafficking policies and programmes.

¹⁷ National Survivors Advisory Councils, for example, facilitate better understanding of the needs of victims and survivors, the crime itself, and can contribute to the design of effective prevention strategies. An OSCE/ODIHR International Survivors of Trafficking Advisory Council (ISTAC), for instance, was established to ensure that voices of survivors are reflected in all its anti-trafficking policy development.

¹⁸ ICAT [Issue Brief 7 Human Trafficking and Technology: Trends, Challenges and Opportunities](#), 2019, p. 4.