

Regional Implementation Initiative on Preventing & Combating Human Trafficking

*Improving National and Transnational Coordination and Cooperation in Preventing and
Combating all Forms of Human Trafficking; Developing and Strengthening National and
Transnational Networks and Partnerships*

<p><i>PRINCIPLES TO GUIDE INITIATIVES TO PREVENT TRAFFICKING IN HUMAN BEINGS AND TO DISCOURAGE TRAFFICKING-RELATED DEMAND</i></p>
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Compiled by Mike Dottridge for discussion at the Vienna Think Tank (**‘MIND THE GAP’**) on 30 September 2022: **TACKLING THE LACK OF ATTENTION ON PREVENTING HUMAN TRAFFICKING & EXPLOITATION**

Since the UN Trafficking Protocol¹ was adopted in 2000, countries around the world have concentrated on strengthening law enforcement responses to human trafficking. In most countries efforts to prevent human trafficking from occurring have received less attention (and less money has been invested in them), although some projects financed by Overseas Development Assistance (ODA) have focused on prevention.

Despite the lack of priority accorded to prevention, a great deal has been learned over the past two decades about what works and what does not. Some prevention methods (such as ‘awareness raising’) have been used repeatedly (often without analysing their impact), whereas others (such as regulating recruitment) have been less popular.

The draft principles listed in Table 1 below are drawn from existing international human rights law, from the case law of regional human rights courts and from ‘lessons learned’ by a range of initiatives to prevent human trafficking,² including efforts to prevent trafficking by ‘discouraging demand’ that fosters the various forms of exploitation for which people are trafficked.³

The principles are intended to guide anyone designing policies, projects or campaigns to prevent human trafficking, whether at international or national level. Although some refer to the obligations of the state (the government) and are particularly relevant for government-financed prevention initiatives, many are also relevant for privately-financed/non-governmental ones.

States have an obligation under international law to act with due diligence to prevent trafficking in human beings. By becoming parties to international treaties, States assume obligations and duties under international law to respect, protect and fulfil human rights for all persons within their territory or jurisdiction, without discrimination of any kind. International human rights law requires States to take action to prevent anyone being subjected to certain violations of human rights, such as slavery and servitude (including debt bondage and most forms of forced or compulsory labour,⁴ including forced prostitution).

A vast array of measures can contribute to preventing human trafficking. Some are applied in the places where trafficking victims are recruited, others in the places where they are exploited.

Regional human rights courts have confirmed that a key preventive measure is to make human trafficking a criminal offence and to enable law enforcement officials to investigate and prosecute offences, expecting the penalties to have a deterrent effect. The draft Principles below do not comment on the effectiveness of ‘deterrence’ as a form of prevention, nor do they focus on what is known as ‘capacity building’ (training police or other officials to understand what constitutes human trafficking and what action they should take in response).

Both the United Nations (UN) **Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children** (2000), supplementing the UN Convention against Transnational Organized Crime, and the Council of Europe **Convention on Action against Trafficking in Human Beings** (2005) include articles on prevention (articles 9 and 5 respectively). The Council of Europe Convention mentions some of the principles on which prevention measures should be based by emphasising the importance of a “human rights-based approach”, “gender mainstreaming and a child sensitive approach” (Article 5.3).⁵

Both the UN Protocol and the Council of Europe Convention contain similar requirements for States Parties to adopt or strengthen legislative, administrative, educational, social or other measures (including through bilateral and multilateral cooperation) “to discourage the demand that fosters all forms of exploitation of persons,⁶ especially women and children, that leads to trafficking” (articles 9 and 6 respectively). The Council of Europe Convention mentions four specific sets of measures that States should take.⁷

The Council of Europe Convention (Article 19) also requires States Parties to consider making it a criminal offence to pay for the services of a person who has been trafficked, “with the knowledge that the person is a victim of trafficking in human beings”. The Council’s Explanatory Report on the Convention (2005) notes (para. 232) that,

“It could, for example, be made a criminal offence, under this provision, for the owner of a business to knowingly use trafficked workers made available by the trafficker. In such a case the business owner could not be treated as criminally liable under Article 18 [of the Convention] – not having him/herself recruited the victims of the trafficking (the culprit is the trafficker) and not having him/herself used any of the means referred to in the definition of trafficking – but would be guilty of a criminal offence under Article 19. The client of a prostitute who knew full well that the prostitute had been trafficked could likewise be treated as having committed a criminal offence under Article 19, as could someone who knowingly used a trafficker’s services to obtain an organ”.

The 25 draft principles are divided into six sections. Each of the principles is accompanied by a short explanation on its implications for the action to take. The six sections focus on:

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| I. | General principles |
| II. | Measures focusing on businesses and other ‘third parties’ |
| III. | Measures focusing on the ‘vulnerability of particular individuals or groups |
| IV. | Basing prevention on accurate information |
| V. | Measures to discourage demand |
| VI. | The need to review, learn and amend |

TABLE 1 DRAFT PRINCIPLES TO GUIDE INITIATIVES TO PREVENT TRAFFICKING IN HUMAN BEINGS AND TO DISCOURAGE TRAFFICKING-RELATED DEMAND

	Principle	Implications for action
I	<i>General principles</i>	
1.	The human rights of people who are trafficked or at risk of being trafficked must be at the centre of all efforts to prevent and combat trafficking.	The UN High Commissioner for Human Rights, Mary Robinson, explained in 2002 what this means: “For me, it means, first and foremost, acknowledging that trafficking and related practices such as debt bondage, forced prostitution and forced labour are violations of the basic human rights to which all persons are entitled. The right to life, to equality, dignity and security; the right to just and favourable conditions of work; the right to health; the right to be recognised as a person before the law. These are rights which we all possess - irrespective of our sex, our nationality, our occupation or any other difference”. ⁸
2.	States are required to respect the principle of non-discrimination, a fundamental rule of international law (and one of particular relevance to the situation and vulnerabilities of irregular migrants).	States must ensure that measures to prevent or combat human trafficking, including measures to discourage demand, do not violate the prohibition on discrimination.
3.	States are required to respect the principle of proportionality.	States must ensure that measures to prevent human trafficking, which involve restricting the exercise of the human rights (such as measures to restrict the emigration of women or other categories of people or to prohibit the purchase of certain services or products), conform with the principle of proportionality: i.e., they must be <u>appropriate</u> to achieve their protective function; they must be <u>the least intrusive instrument</u> amongst those which might achieve the desired result; and they must be <u>proportionate</u> to the interest to be protected. ⁹
4.	States have an obligation to investigate credible reports of trafficking-related abuse wherever they occur in their jurisdiction, including difficult-to-reach places (such as the high seas and remote mountains or forests) and workplaces that are regarded as ‘private’, such as family homes (where migrant domestic workers live and work). States must consequently create (and provide adequate resources to) appropriate bodies to investigate all sectors of the economy where human trafficking might occur.	Investigations to assess whether trafficking or related exploitation is taking place may be carried out initially by researchers or a range of statutory or non-statutory organisations, including non-governmental organisations and academic researchers. Providing adequate resources means supporting conventional law enforcement bodies and others, such as labour inspectors with access to workplaces and social workers who have access to private homes (as a matter of principle, privacy considerations may not take precedence over the human rights and labour rights of domestic workers employed in private homes).

	Principle	Implications for action
5.	Human trafficking can be prevented by a range of measures which, though not designed solely to prevent individuals being trafficked, are known to have a significant preventive and protective effect and to reduce the likelihood of particular individuals or groups being trafficked.	Such measures include pro-active child protection (in places where children are known to be trafficked), measures to reduce domestic violence (in situations where significant numbers of trafficking victims are reported to have left home to avoid domestic violence), and measures to counter discrimination against women, minorities or other social groups that are known to be trafficked.
6.	Effective prevention, like effective protection, benefits from a ‘joined-up’ set of measures being implemented in the places where trafficked victims are recruited, moved and exploited.	Whenever there are not practical obstacles to such cooperation, States and others engaged in efforts to prevent trafficking in human beings should endeavour to ensure the coherence of prevention initiatives along an entire trafficking route.
II	<i>Measures focusing on businesses and other ‘third parties’</i>	
7.	States have a responsibility to protect against human rights abuses committed by third parties (such as organised criminal groups, armed groups and also legitimate business enterprises) through appropriate policies, regulation and adjudication.	The human rights abuses concerned include trafficking in human beings and related exploitation and all forms of enslavement and servitude. The United Nations <i>Guidelines on Business and Human Rights</i> ¹⁰ provide detailed guidance for both States and businesses on appropriate measures. States are responsible for setting out clearly the expectation that all businesses domiciled in their territory and/or jurisdiction will respect human rights throughout their operations, both at home and abroad, and take appropriate action to stop trafficking in human beings or related exploitation from occurring, regardless of the size, sector, operational context, ownership and structure of the business enterprise. States have a responsibility to monitor the efforts of businesses operating or domiciled in their territory to carry out ‘human rights due diligence’ and promote good practice.
8.	States have an obligation to put labour market regulatory and supervisory mechanisms in place whenever they encourage, facilitate or tolerate any forms of labour migration (including migration for domestic work in private homes and migration to earn money from begging or prostitution), as the absence of such mechanisms is likely to have the effect of undermining the rule of law and facilitating trafficking in human beings. ¹¹	Such mechanism make it less feasible to recruit or exploit workers in illegal ways and thereby reduce the demand for workers who are paid below the minimum wage or abused in other unacceptable ways. Without freedom of association and collective bargaining for groups such as migrant workers, measures to reduce their vulnerability to being trafficked or exploited in forced labour are unlikely to be effective or sustainable in the long run.

	Principle	Implications for action
III	<i>Measures focusing of the ‘vulnerability’ of particular individuals or groups</i>	
9.	Taking gender- and age-specific issues into consideration is essential when designing measures to prevent human trafficking.	Measures to prevent human trafficking should be sensitive to both gender and to the age (in the case of children, in particular) of those who have been or are deemed at risk of being trafficked and exploited. ¹² They should avoid being based on naïve or poorly informed stereotypes about trafficking victims.
10.	Prevention of human trafficking should include measures to challenge discriminatory practices that contribute to the exploitation of persons.	The discriminatory practices concerned include discrimination based on gender, ethnicity, national origin and other criteria, such as employment practices that discriminate against specific categories of workers and cause prejudice to them (e.g., women or migrant workers in general, or women migrants in particular), and cultural perceptions that particular groups are ‘submissive’ or have ‘inferior’ social status. ¹³ Measures to challenge discrimination include ones that deliberately tackle exclusion and facilitate access to rights and entitlements for categories of people who are subject to multiple forms of discrimination.
11.	Measures to prevent human trafficking should pay particular attention to preventing particular social groups or categories of people from being trafficked, when there is evidence that such groups have been trafficked in disproportionately larger numbers than others (i.e., are particularly ‘vulnerable’ to being trafficked).¹⁴	Assessing which groups or categories of people might be involved requires sufficient information to have been collected to identify such groups, either in the course of law enforcement operations or by researchers. A recent OSCE-ODIHR publication lists a series of “pre-trafficking vulnerabilities” that have been found to increase the likelihood that particular people will be trafficked. It comments, for example, on vulnerability due to particular experience in a family (including family violence), to the vulnerability of certain communities that have particular features, and the marginalization and discrimination that occurs within communities and makes particular individuals vulnerable. ¹⁵
IV	<i>Basing prevention on accurate information</i>	
12.	Effective prevention must be based on the evidence available about patterns of trafficking.	Evidence may come from cases known to law enforcement officials and organisations that have provided advice or assistance to victims, or the findings of independent researchers. ¹⁶ The aim should be to identify characteristics of human trafficking and related exploitation that can potentially be influenced by prevention measures, such as the heightened vulnerability of particular individuals or communities. Policymakers often appear to prefer quantitative research findings, but these fail to gather or communicate the perspective of those who have been

	Principle	Implications for action
		trafficked or are at risk of being trafficked, so qualitative research is also essential (observing suitable ethical principles).
13.	It is vital to listen to the voice of survivors when designing prevention measures.	Understanding the experience of people who have already been trafficked and also of those in similar situations who avoided being trafficked is key to designing effective prevention and protection measures. ¹⁷
14.	It is appropriate, when designing prevention measures, to consult representatives of social groups likely to be impacted by such measures.	Reconciling several principles mentioned above – applying the principle of non-discrimination while also giving priority to measures to prevent members of specific social groups from being trafficked – may be challenging. It is likely to be appropriate for the authorities to seek the views of representatives of any particular group of people who would potentially be affected by measures to prevent human trafficking in a significant way and take these views into account when designing prevention measures. In the case of particular ethnic or minority groups or indigenous peoples, it is likely to be appropriate to involve some of the individuals concerned, or their representatives, in the design, implementation and evaluation of the measures.
15.	Information about human trafficking in publicity materials, whether for the general public or specific target groups, must be as accurate as possible.	It is essential to avoid misleading people who might be trafficked, e.g., by publicising inaccurate stereotypes about who is most likely to be trafficked or in which countries or economic sectors trafficking is frequent. States should ensure, in places where adults or children have been trafficked or exploited, topics related to human trafficking are included in the curriculum of school children before they finish their compulsory education. Public information should avoid divulging any information that could lead to individuals who have been trafficked being identified.
V	<i>Measures to discourage demand</i>	
16.	The obligation on States to discourage the demand that fosters all forms of exploitation of persons means that States must identify factors that foster ‘exploitation of persons’ and contribute to demand, including the full range of factors that cause or facilitate human trafficking.	This requires research and analysis of the factors that are reckoned to play a role in generating demand for exploitative commercial sexual services and exploitative labour. As stated in #12 above, research should aim to identify characteristics of human trafficking and related exploitation that can potentially be influenced by prevention measures. It should also identify salient characteristics of people who contribute to the income of traffickers, whether wittingly or unwittingly.

	Principle	Implications for action
17.	Discouraging trafficking-related demand involves measures to address the nature and extent of the exploitation of trafficked victims.	Relevant preventive action is required primarily in the places where trafficked people are exploited. When products made with the involvement of trafficked workers are exported to other countries, action is required in all the countries involved to influence consumers, retailers and manufacturers.
18.	Discouraging demand requires measures to address the social, cultural, political economic, legal and development factors that shape demand and influence or enable the trafficking process.¹⁸	Such measures should aim to influence the purchasing decisions of individuals and businesses that contribute, wittingly or unwittingly, to the income of traffickers and their associates. The purchasing decisions concerned are not limited to those of end-users (consumers, or, in the case of care services or sexual services, ‘clients’) but include decisions made throughout a supply chain or ‘value chain’, i.e., they should address businesses or other entities which provide goods or services that have involved people who have been trafficked and should also address business that supply raw or processed materials to other businesses which exploit trafficked workers. ¹⁹
19.	Measures to discourage demand should challenge discriminatory attitudes that contribute to the exploitation of persons (i.e., factors based on gender, ethnicity, national origin or other criteria).	The discriminatory attitudes that need to be targeted (and modified) are likely to be held by individuals paying for services, such as personal care, domestic work and commercial sex, notably perceptions that certain categories of women, men or children are ‘submissive’ or otherwise willing to put up with being exploited or who are in such a vulnerable position that they feel unable to object.
20.	Discouraging demand does not necessarily require blanket prohibitions on purchases of particular goods or services. Measures should be designed to influence purchasing decisions related specifically to products or services provided by individuals subjected to one of the forms of exploitation that are purposes of human trafficking.	Blanket prohibitions are justified when they relate to services or products whose purchase is illegal, such as sexual services provided by children aged under 18. ²⁰ Further, States are entitled to make the purchase of certain services contingent on the provider being licensed to provide the service in question (such as recruitment services). The principle of proportionality (see #3 above) may be interpreted to mean that it is reasonable to impose a blanket prohibition if there is evidence that the majority (or a substantial minority) of people providing a particular service or producing a particular product have been trafficked. It would be counter-productive if a measure intended to prevent trafficking had a negative impact on employers or traders who have actively avoided exploiting anyone who is trafficked.
21.	States have an obligation to exercise due diligence in identifying and eradicating public-sector	This obligation concerns the procurement decisions of State-run organisations and agencies. It also relates to the behaviour of individuals employed by the

	Principle	Implications for action
	involvement or complicity in human trafficking. This includes measures to discourage demand by government departments, local government, parastatal organisations and all branches of the State's security forces and law enforcement agencies.	government when they are deployed on official missions (whether abroad or within their own countries), such as troops on peacekeeping duties, civilian police and humanitarian and diplomatic personnel. Intergovernmental organisations (accountable to states) have similar obligations concerning procurement decisions and the behaviour of those they employ or deploy.
22.	States have a duty to regulate advertising and related information that is publicly available about particular products or services (or to ensure that self-regulation by the advertising industry is appropriate and effective).	The aim of regulation is to ensure that businesses and consumers have access to accurate rather than false information, about products and services that they might buy. False information might take the form of a business claiming that its supply chain is 'slavery free' when it is not, or an organisation advising consumers what products to buy or not to buy, when this is based on flawed information.
23.	Measures to discourage demand should conform with general principles associated with the rule of law.	States have a duty to publicize any changes in the law that make it an offence to purchase certain types of services or products made or provided by people who have been trafficked. They have a duty to ensure that unambiguous information is available to potential purchasers (both businesses and consumers) about such services or products. The measures taken should not make it an offence to purchase a particular service or product in circumstances in which the purchaser could not reasonably be expected to be aware that he or she was committing an offence.
VI	<i>The need to review, learn and amend</i>	
24.	States have a responsibility to ensure that anti-trafficking measures, notably preventive measures, do not adversely affect the human rights and dignity of persons.	This responsibility refers both to the rights of those who have already been trafficked and also to refugees, asylum-seekers, internally displaced persons, irregular migrants, and others who are considered to belong to 'vulnerable' or 'at high risk of being trafficked' groups or are likely to be impacted or are already known to have been (such as women and men earning an income in the commercial sex sector). ²¹
25.	Measures to prevent human trafficking must be evaluated periodically and modified on the basis of the lessons learned.	This applies both to general strategies and specific campaigns (such as information campaigns to increase the awareness of young job-seekers that there are at risk of being trafficked). The principle to be observed is that the lessons learned from previous prevention efforts (whether these were a success or failure) must be taken into account when designing subsequent prevention initiatives.

ENDNOTES

¹ The United Nations (UN) Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (2000), supplementing the UN Convention against Transnational Organized Crime.

² Recently published sources are cited in the text, whereas texts which are well-known most to anti-trafficking practitioners (such as the UN High Commissioner for Human Rights' *Recommended Principles and Guidelines on Human Rights and Human Trafficking*, 2002) are not. One recent publication by the Organization for Security and Co-operation in Europe (OSCE) focuses specifically on "the demand that fosters sexual exploitation" (OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, *Discouraging the Demand that fosters trafficking for the purpose of sexual exploitation*, 2021).

³ The UN Trafficking Protocol and Council of Europe Convention list these forms of exploitation as: the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude and the removal or organs.

⁴ Certain forms of forced labour, such as conscription for military service, are not prohibited by international treaties. See Article 8 of the International Covenant on Civil and Political Rights (1966).

⁵ The Council of Europe Convention requires States Parties to "establish and/or strengthen effective policies and programmes to prevent trafficking in human beings, by such means as research, information, awareness raising and education campaigns, social and economic initiatives and training programmes, in particular for persons vulnerable to trafficking and for professionals concerned with trafficking in human beings" (Article 5.2).

⁶ In the context of human trafficking, the "exploitation of persons" includes the various forms of exploitation that are explicitly named as "purposes" of trafficking in the UN Trafficking Protocol and the Council of Europe Convention (see note 3 above).

⁷ The four measures specified in Article 6 of the Council of Europe's Convention are:

- a. research on best practices, methods and strategies;
- b. raising awareness of the responsibility and important role of media and civil society in identifying the demand as one of the root causes of trafficking in human beings;
- c. target information campaigns involving, as appropriate, inter alia, public authorities and policy makers;
- d. preventive measures, including educational programmes for boys and girls during their schooling, which stress the unacceptable nature of discrimination based on sex, and its disastrous consequences, the importance of gender equality and the dignity and integrity of every human being.

⁸ Mary Robinson, Remarks at an OHCHR/Council of Europe Panel Discussion: 'Combating Trafficking in Human Beings – A European Convention?', 9 April 2002.

⁹ Paragraphs 14 and 15 of the Human Rights Committee's General Comment 27 ('Freedom of movement', Article 12 of the International Covenant on Civil and Political Rights) set out this principle, pointing out that "The principle of proportionality has to be respected not only in the law that frames the restrictions, but also by the administrative and judicial authorities in applying the law". The Human Rights Committee is the treaty-monitoring body established under the terms of the International Covenant on Civil and Political Rights (1966). See UN Document CCPR/C/21/Rev.1/Add.9 (1999).

¹⁰ Also known as 'The Ruggie Principles'. Accessed at [GuidingPrinciplesBusinessHR_EN.pdf \(ohchr.org\)](#).

¹¹ A recent International Labour Organization (ILO) publication noted that "The creation of decent jobs and robust social protection floors do not feature in conventional anti-trafficking and forced labour policies and programmes, yet they play a determining role in reducing the vulnerability to forced labour" (ILO Work in Freedom Programme, *Lessons learned on policy and programme responses to unfree labour in destination countries for migrant women workers*, 2022).

¹² The Committee on the Elimination of Discrimination against Women (CEDAW), the body responsible for monitoring implementation of the UN's Convention on the Elimination of Discrimination against Women (1979), has noted that appropriate measures to prevent discrimination against women include the regulation of the activities of private actors with regard to education, employment and health policies and practices, working conditions and work standards, and other areas in which private actors provide services or facilities, such as banking and housing (CEDAW/C/GC/28, para. 13).

¹³ The ILO regards freedom from discrimination in the world of work as one of the four sets of fundamental principles and rights at work.

¹⁴ This principle was set out in a judgment of the Inter-American Court of Human Rights: *Workers of the Green Brazil Ranch (Fazenda Brasil Verde) v Brazil* (judgment of 20 October 2016). Paragraph 320 states:

"[T]o act with due diligence, States must take comprehensive measures in cases of servitude, slavery, trafficking in persons and forced labour. In particular, States must have an adequate legal framework for protection, with effective enforcement and prevention policies and practices to enable them to respond effectively to complaints. The prevention strategy must be comprehensive, that is, it must prevent risk factors and at the same time strengthen institutions so that they can provide an effective response to the phenomenon of contemporary slavery. In addition, **States should take preventive measures in specific cases where it is clear that certain groups of persons may be victims of trafficking or slavery**" (unofficial translation, emphasis added).

¹⁵ See OSCE Office for Democratic Institutions and Human Rights, *National Referral Mechanisms, Joining Efforts to protect the Rights of Trafficked Persons. A Practical Handbook*, Second Edition, 2022, pages 58 to 73.

¹⁶ States may carry out such research themselves (and publish the results) or commission others to do so, such as intergovernmental or non-governmental organisations or academic institutions with appropriate expertise. It would not be appropriate for a State to claim that the preventive measures it implements are based on evidence without making such

evidence publicly available (declassified and anonymous as appropriate to avoid prejudicing law enforcement operations or the privacy of survivors).

¹⁷ Building on the experience of individuals who shared the profile of trafficking victims but who avoided being trafficked is known as ‘positive deviance’.

¹⁸ In 2020 the Committee on the Elimination of Discrimination against Women adopted General Recommendation No. 38 on trafficking in women and girls in the context of global migration. This observes that “Strategies aimed at preventing trafficking must take into account demand as a root cause. Failure to recognize the demand is acknowledged to be one of the barriers to States addressing human trafficking. Demand in the context of trafficking is often shaped by desire for financial gain, discriminatory attitudes, including cultural attitudes, and beliefs. Women may be preferred for certain forms of exploitation because they are perceived as weak and less likely to assert themselves or to claim the rights to which they are entitled. Certain ethnic or racial groups may be targeted for trafficking-related exploitation on the basis of racist or culturally discriminatory assumptions relating to, for example, their sexuality, and servility or work capacity” (para. 29).

¹⁹ The term ‘supply chain’ refers to a business’ suppliers, whereas the term ‘value chain’ refers to those it sells to as well as those it buys from. In the 1990s the campaign against the involvement of bonded child workers in manufacturing hand-knotted carpets in South Asia focused on developing a guarantee for consumers that particular carpets had been made without illegal child labour being involved. Focusing on the entire value chain would have put more responsibility on the businesses that produced wool to sell to carpet makers in South Asia; these businesses were mostly based in Australia and New Zealand and were reportedly unaware at the time that their products were being processed with the involvement of children in bonded labour (debt bondage).

²⁰ International standards make it unacceptable for children under 18 to provide commercial sexual services or to be exploited in prostitution in any circumstances.

²¹ Governments can potentially carry out human rights impact assessments to examine policies, legislation, programmes and projects prior to their adoption, to identify and measure their likely impact on human rights.