



## Women Trafficking Other Women and How International NGOs Fail to Address the Issue

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### ARTICLE INFO

### ABSTRACT

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**Article History:**

Received: 1 Jun 2020

Revised: 17 Jul 2020

Accepted: 25 Dec 2020

**Keywords:**

Human trafficking,  
Women perpetrators,  
Sexual exploitation,  
GAATW,  
CATW.

There is currently a fairly large body of research on the role of men who are involved in human trafficking. However, hardly any research has been carried out on the role of women as perpetrators of this crime. The official anti-trafficking narrative, therefore, assumes that women (and children) are innocent and powerless victims who need rescuing. Whilst many international organisations working against human trafficking have developed robust comprehensive approaches to combat this crime and to support victims of sexual exploitation, their approaches have aided in preventing possible trafficking of persons and in protecting victims. They tend to be victim-centric, meaning the process of prosecution does not also include women offenders. Grounded within the theories of feminism and neo-liberal institutionalism, this paper uses a comparative analysis method to analyse the current anti-trafficking approaches and discourses of two leading international organisations; GAATW and CATW. The paper argues that the exclusion of women perpetrators in anti-trafficking discourses has adverse effects on the actions taken against trafficking, especially in relation to

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prosecution. This exclusion makes it difficult to distinguish between women who are victims of human trafficking and women who are perpetrators. This paper therefore suggests that it is crucial to include women perpetrators in anti-trafficking discourses in order to provide a better understanding of the existing intersections between sexual exploitation and economic disparity, gender inequality and wider inequalities. Only then can current anti-trafficking narratives achieve their goals and be more effective.

## Introduction

Global reports on trafficking in persons show that the number of female offenders suspected of trafficking in persons has increased from 28% in 2012 (United Nations Office on Drugs and Crime [UNODC] & The European Institute for Crime Prevention and Control, affiliated with the United Nations [heuni], 2015) to 38% in 2016 (UNODC, 2018). According to data from more than 50 countries, the involvement of women in trafficking offences is relatively higher compared to most other crimes (UNODC, 2012). Despite the increase in the number of women offenders in the trafficking industry, the problem is rarely addressed within the anti-trafficking discourse of national and international non-governmental organisations (NGOs and INGOs).

The 2000 United Nations' *Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children* (herewith the Protocol) focuses on criminalisation and punishment of traffickers (Adams, 2011; Smith, 2011; Tuttle, 2017). However, NGOs and INGOs are concerned that the emphasis put on criminalisation may violate the rights of victims as well as non-victims such as sex workers, depriving them of their liberty (Global Alliance Against Traffic in Women [GAATW], 2007). The concern that NGOs and INGOs have over the protection of victims is imperative because 94% of victims of sexual exploitation are women and girls, whereas the percentage of women offenders is considerably lower at 38% (UNODC, 2018). However, this paper argues that despite the smaller number of women offenders, the issue needs to be addressed within the anti-trafficking discourse of international organisations as it helps shift the focus from victim-centric approaches to approaches that can help identify

possible perpetrators. It also helps provide a better understanding of the socio-economic and cultural factors that explain why some women turn to these criminal activities when they become perpetrators.

By using qualitative comparative analysis method within qualitative interpretative research, this paper studies two leading INGOs, namely the Global Alliance against Trafficking of Women (GAATW) and the Coalition against Trafficking of Women (CATW). The focus is on their anti-trafficking approaches, specifically with regards prevention, protection, and prosecution (also known as the 3Ps) of the trafficking phenomenon. The "3P" paradigm is still considered the principal international framework used across the globe to combat human trafficking. This paper is aware of the increasing importance of "partnerships" as the fourth P in this paradigm since it was introduced by the U.S. State Department in 2009. It therefore recognises that a complex and multi-faceted issue like human trafficking necessitates global comprehensive efforts involving a broad range of stakeholders including state and non-state actors. However, it is clear that the 2009 "International Framework for Action to Implement the Trafficking in Persons Protocol" also puts much emphasis on the importance of national and international coordination and cooperation amongst all different stakeholders. In fact, both GAATW and CATW engage with local, national, and international partners and decision-makers around the world for various purposes including research, advocacy and information-sharing.

This paper chose to study these two international organisations because of their focus on sex trafficking and because of the global nature of their work. As a complex and transnational phenomenon, it is more appropriate to select INGOs that have alliances with a broad range of local and national groups that share a similar vision and purpose when it comes to combatting human trafficking.

Grounded within the theory of feminism, this paper also aims to examine the extent to which gender, socio-economic oppression, as well as structural discrimination are common causes that instigate women to become victims and perpetrators. It also assesses if and how these factors are addressed within the anti-trafficking approaches of international organisations

and are considered crucial components when developing anti-trafficking strategies and plans. In addition, based on the theoretical framework of neo-liberal institutionalism, this paper aims to discuss the ways in which international institutions can address the issue of women offenders in the future and critically analyse the works of INGOs. Neoliberal institutionalism focuses on the roles played by international institutions in maintaining global governance even in the absence of a global government (Sterling-Folker, 2013). These institutions can range from those that merely have common principles and practices to those with sophisticated systems of governance such as the United Nations and INGOs. Given the state of international politics today, which is witnessing a rise in supranational power created by states, the need to account for the role of international institutions is greater than ever before.

## **Methodology**

Based within the theories of feminism and neoliberal institutionalism, this paper will examine if these organisations are aware of how their narratives and approaches facilitate mutual responsiveness against human trafficking in the international arena. This paper also tries to assess if prioritising the issue of women offenders in current narratives of INGOs may help strengthen trafficking combating tools. It will further investigate the importance of institutions in fighting human trafficking and the shortcomings they face during the process.

By using the comparative analysis method, a comparison between two INGOs with different principles but similar missions and approaches to anti-trafficking will be drawn to find out where they stand on the issue of women offenders. The comparison will be drawn based on similar anti-trafficking measures that these organisations have implemented in various parts of the world. The table below shows the variables used to compare GAATW and CATW. These anti-trafficking measures, or the 3Ps, are key pillars of the 2009 “International Framework for Action to Implement the Trafficking in Persons Protocol.”

Anti-trafficking measures (3Ps)	Variables compared within the measures
<i>Prevention</i>	<i>Awareness campaigns;</i>
<i>Protection</i>	<i>Identification of victims and perpetrators;</i>
<i>Prosecution</i>	<i>Long term and short-term settlement of victims, Rehabilitation</i>

To compare the above variables, this paper used documents and data from a number of different sources, such as government reports and documents, to underline the context and background of human trafficking. Official press releases or reports on trafficking prepared by governmental organisations, including the U.S. Department of State and UN agencies, especially UNODC, were used. In addition, this paper extensively used publications, reports and data provided by the two INGOs under study: CATW and GAATW. This research also relied heavily on secondary data such as academic publications like journals, books, and peer-reviewed articles.

### Defining Human Trafficking and Sex Trafficking

Human trafficking is a transnational organised crime that seeks a transnational organised response mechanism. The 2000 Palermo Protocol provides the following definition:

"Trafficking in persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

The above-mentioned definition of human trafficking is “the first agreed-upon definition of trafficking after more than five international documents addressing the issue in the last century (Iñiguez de Heredia, 2008, p. 300). Apart from this, the International Labour Organization, in cases of forced labour, states that “trafficking is a process that very often ends in forced labour — be it forced commercial sexual exploitation or different forms of economic exploitation” (Forced Labour Convention, 1930). The Victims of Trafficking and Violence Protection Act (2000) defines sex trafficking as “a commercial sex act [which] is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age” (Orme & Ross-Sheriff, 2015).

However, the above-mentioned definitions still lack clarity when it comes to sex trafficking (Iñiguez de Heredia, 2008). In terms of a specific definition regarding female sex trafficking, a clear and separate definition has not been developed as yet. Most authors, therefore, rely on the broader definition of human trafficking and provide dissimilar definitions in their scholarly works (Meshkovska et al., 2015).

The lack of a specific inclusive definition adds ambiguity when interpreting sex trafficking as it varies according to location (Karlsson, 2013). There may also be cases where the lack of a clear definition makes it difficult to comprehend the difference between sex trafficking and human trafficking, which may result in the criminalisation of victims of sex trafficking. Without a clear universally agreed definition, it is difficult for concerned bodies to distinguish victims from perpetrators. This makes it hard to identify and punish traffickers. As GAATW argues, because there is no international definition of sexual exploitation, countries can define and address sex trafficking as they consider appropriate, leaving them a great deal of leeway (GAATW, 2007).

### **Factors that push women to fall victim of human trafficking and to turn into perpetrators**

Women offenders in sex trafficking are usually those who lure other women and girls in order to exploit them. There is limited literature that discusses why women choose to victimise other women in sex trafficking. Nevertheless, the available sources on how women become

perpetrators and what pushes them to choose to become involved in sex trafficking show specific factors that indicate some similarity between the root causes of women being victimised and women becoming offenders. These factors include women's vulnerability, gender-based violence and women's socio-economic status.

For instance, a study conducted among Mexican girls from lower socio-economic classes show that vulnerabilities generated by socio-economic inequalities and gender-based violence make young girls more susceptible to sexual exploitation (Rocha-Jimenez et al., 2018). These factors do not only account for why women become victims of human trafficking but are dominant in shaping potential pathways for women to become perpetrators.

Among the victims of sex trafficking, there are cases where some women fall victim to the exploitative conditions of sex work in order to free themselves from socio-economic and gender discrimination in their home country (Kienast et al., 2014). This trend has been reported in Southeast Asia, where some families send their female members to become sex workers in order to help support the family. Because such members are often young or even underaged girls, they may refuse to identify themselves as victims but rather feel proud because they consider themselves to be dutiful members earning for the family.

In some other cases, victims are not aware when they enter exploitative situations because they are deceived about the working environment. They are promised good job opportunities but once they reach their destination, they realise that they have been deceived. They end up being trapped in debt or bondage that makes it difficult for them to return home, so they remain exploited for many years (Kienast et al., 2014). There are also a few instances where some victims choose to exploit others in order to make themselves feel more powerful and less victimised. This happens especially when the victims do not have the option to make a life for themselves outside the trafficking business. Thus, they gradually move towards the organisational side of the trafficking business to escape further humiliation and abuse.

The cases mentioned above demonstrate that socio-economic and gender-based discrimination that put women in a vulnerable position and compel them to migrate and look

for better opportunities. Nevertheless, offenders, including other women, can also use women's vulnerability against them.

### **Profile of Women Perpetrators and their Roles**

The number of female victims outnumbers female perpetrators. Therefore, most literature focuses on female victims of sex trafficking. This paper argues that women offenders involved in sex trafficking need attention because, unlike other crimes they get involved in, most women offenders may themselves be trapped in the vicious cycle of sex trafficking.

The profile of women offenders and their roles vary depending on their origins and culture. But the most common role they play is that of recruiters actively participating in recruiting other women and girls for sexual exploitation purposes (Francis, 2016). These roles are generally labelled as “the madam, the partner-in-crime, the authority figure, the grilla, the handler, and the bottom bitch” (Francis, 2016, p. 4). Each of these labels is used to describe the specific responsibilities women have in this type of organised crime. For instance, “madam” refers to a woman who runs the organisation while a “grilla” (also called “gurlilla pimp”) describes a female who uses force to control trafficked women (Francis, 2016, p. 5).

One of the main reasons they engage in the recruiting process is because women are generally perceived to be victims rather than offenders. This tends to work in their favour since the general assumption is that female recruiters are more likely to gain the trust of other women than male offenders just because they are women (Kienast et al., 2014). Furthermore, these women are not only hired to work as recruiters. They also play the role of guardians for the victims once they start working for them and their criminal gangs. The literature also shows that some of the women offenders can hold management positions — being in charge of earnings and bookkeeping.

In most cases, offenders who recruit other women are themselves victims of sex trafficking (Meshkovska et al., 2015). Although most women offenders are generally found to be recruiters, the way they work varies from country to country. In Nigeria, they are known as “madams” who use family relations to recruit young girls from villages (Kienast et al., 2014).

By contrast, in Russia and the Ukraine, they present themselves as businesswomen who usually work independently. In Thailand, “mama-sans” work as partners in crime, helping their husbands or other family members in the recruiting process.

The jobs that women offenders accept in general indicate that women are often involved in low-ranking tasks, especially when it comes to transnational organised crime networks. This puts them more at risk of detection by police (Kienast et al., 2014). However, if offenders are found involved in sex trafficking willingly, it is because they acquire knowledge and experience about the internal processes of trafficking networks during the time of their exploitation and get involved in crime as an escape from their exploitative situations. This happens to women trapped in sex work because returning home is difficult given the stigma attached to the sex trade. To escape the brutality of unwanted sex work, therefore, women become perpetrators instead. Some studies have also found that women perpetrators are thought of as the “ignorant wife” or partner of a male offender. As such, their role is that of a supporting partner who has been lured to use their femininity to recruit women victims (Wijkman & Kleemans, 2019).

### **The Global Alliance against Trafficking of Women (GAATW) and the Coalition against Trafficking of Women (CATW)**

Both INGOs (GAATW and CATW) work against trafficking of women. However, when it comes to the issue of sex work, they are divided when it comes to the feminist principle of whether women’s involvement in sex work is consensual or the result of women’s exploitation.

GAATW was one of the first international organisations to take the initiative of arranging the very first camp to promote and protect sex workers’ rights (Meshkovska et al., 2015). Today, it is a network of over a hundred NGOs that work against trafficking and ensure the rights of victims of all forms of human trafficking. Founded in 1994 and based in Thailand, GAATW offers particular attention to female victims, arguing that trafficking disproportionately affects women and girls. GAATW also advocates for women’s labour rights. As Usman (2014)

states, “their intellectual roots lie in the second wave of feminism. Also known as the sex work position, feminists in this camp view prostitution as a legitimate form of labour and migration for prostitution as a means of escaping from poverty” (p. 284).

CATW, on the other hand, believes in coercion as the root cause of sex trafficking. Founded in 1996 and based in New York, this INGO advocates for the abolition of sex trafficking and prostitution to ensure women’s human rights and to end trafficking of women. It operates in Africa, Asia, Australia, Europe, Latin America, and North America. It also has national coalitions in over fifteen countries including Bangladesh, Thailand, Venezuela, Puerto Rico, the United States, Canada, France, and Greece. CATW believes that “no woman could ever willingly choose to be a prostitute; thus, any woman who migrates for the purpose of sex prostitution (whether coerced or not) is a trafficking victim” (Usman, 2014, p. 284) and sex trafficking is “nothing more or less than globalized prostitution” (Leidholdt, 2004, p. 177).

### **GAATW, CATW, and the Three Ps**

Whether women are trafficked or choose to work in the sex industry, the response mechanisms against trafficking are similar. The 2009 “International Framework of Action” is a tool that helps United Nations Member States in the effective implementation of the protocol. This framework serves as the foundation to combat human trafficking and to protect victims (US Department of State, 2020). CATW, GAATW, and their affiliated NGOs base their anti-trafficking approaches on the 3Ps.

#### **a) Prevention**

Under Prevention, the measures described in the 2009 International Framework of Action suggest that member states strengthen measures in order to make people less vulnerable to trafficking and to discourage the demand that increases all forms of trafficking in persons (UNODC, 2009).

Both CATW and GAATW run projects that empower women focusing on strategies to help them leave exploitative situations. They have also established awareness-raising

programmes as prevention strategies in countries of origin and destination. CATW carries out multi-tiered measures to prevent sex trafficking and sexual exploitation by developing appropriate multi-tiered approaches that meet geographical and cultural demands of victims. For instance, in Asia, CATW conducts campaigns on sexuality, sex work and gender issues among vulnerable young women. The aim is to lessen sexual exploitation of women and reduce the number of perpetrators among men. While in Europe, prevention measures of CATW focus on anti-sex tourism to promote awareness of women's rights and to advocate against initiatives that support the decriminalisation of the sex industry.

Similarly, GAATW offers prevention efforts at the local level through community participation and safe migration to reduce women's vulnerability. It encourages a diverse range of innovative practices to develop, replicate, and assess anti-trafficking measures using pre-established indicators that meet trafficking trends in Asia. In Europe, GAATW takes awareness-raising approach as the primary prevention initiative, particularly in south eastern and central regions because it has identified a lack of monitoring and effectiveness indicators of existing approaches.

### **b) Protection**

The measures described in the International Framework of Action under Protection/Assistance suggest that member states harmonise and assist victims of trafficking to provide them with protection that meets international standards. It also suggests protecting victims of trafficking in countries of origin and destination to prevent re-trafficking or re-victimisation (UNODC, 2009).

Protection as an anti-trafficking measure focuses on the services provided to the victims once they are identified, which generally include emergency and long-term services. CATW provides aid in the initial phase of protection i.e. to rescue women and children who are victims of sex trafficking and prostitution around the world. In addition, it provides services such as housing, economic assistance, legal counselling, support, and education to victims of commercial sexual exploitation.

GAATW and its 100-plus member organisations across the globe provide primary services diverse enough to meet the needs of victims including the screening of victims, providing health and psychological counselling, shelter, accommodation, and vocational training as well as language training. These services are both long- and short-term, include victim-centric approaches, and are intended to empower women around the world. GAATW's very first publication entitled "Practical Guide to Assisting Trafficked Women" (1997) offers real insight into how victims can be supported hence their victim-centric strategy.

### c) Prosecution

The measures described in the framework under Prosecution suggest that member states ensure common norms, appropriate criminal justice response, and a legal framework to facilitate international cooperation. The framework also suggests that members provide the basis for detection, investigation, and prosecution of offenders and adequately punish traffickers to avoid re-victimising trafficked persons (UNODC, 2009).

Prosecuting human trafficking is considered one of the most effective national responses to trafficking. However, compared to the magnitude of the trafficking problem, the number of prosecutions remains very low. Not many traffickers are punished, and the criminal justice system has no provisions to ensure benefits to those who are victims (Gallagher, 2016). In one of the debates on prosecution and its costs, GAATW found that most scholars were divided on two central ideas: "failure to prosecute trafficking effectively makes a mockery of criminalisation and ensures the cycle of exploitation will continue unchecked; and, prosecutions that ignore the rights and needs of victims are hollow victories that will never deliver true justice" (GAATW, 2007).

For CATW, on the other hand, "the de-criminalisation of prostituted persons and the criminalisation of traffickers, pimps and sex buyers — is recognised as the most effective sex industry by legislation to prevent trafficking." (Coalition Against Trafficking in Women Australia [CATWA], 2019). Despite this emphasis on prosecution and de-criminalisation of victims, the reports of these two organisations make no mention of the need to detect and prosecute women perpetrators.

## Findings and Analysis

Different feminist theories are at the centre of the ongoing debate on trafficking in persons. Feminist analysis argues that human trafficking is a gender-based phenomenon, which affects mostly women and girls. More specifically, on the issue of trafficking for sexual exploitation, some feminist scholars question the extent to which sex work or indeed any sexual act performed for financial gain can ever be considered voluntary (Wilson & Butler, 2014). The current discourse remains polarised and tends to split feminists into two broad groups.

One group (generally known as Feminist Abolitionists) believes that trafficking for sex harms women and helps sustain structural inequalities so prevalent in patriarchal societies. In other words, abolitionists argue that men control all aspects of a woman's life and, therefore, consent has little to no meaning. Furthermore, they assume that no woman can possibly make a conscious decision to sell her body (Gerassi, 2015). Proponents of this approach campaign for the formulation and implementation of social welfare policies in order to raise awareness about the harm prostitutes and trafficked women experience. Social norms that help the spread of sex trafficking need to be addressed whilst the sale of sex must be decriminalised.

For the second group of feminists known as harm-reduction advocates, a set of principles and practices related to public health and human rights are considered key in helping reduce any negative outcomes linked to sex work and sex trafficking. This approach considers sex work to be an umbrella concept for a specific type of labour whereby sexual services are offered in return for payment. On the issue of consent, they argue that women sex workers can and do give their consent although they also insist on noting that, for many women, consent is not an option. This is particularly true when coercion or force is used. These advocates prioritise the dignity, rights and safety of anyone engaged in such activities/work; hence the focus on women's rights to make their own choices. For some, these choices are thought to be the result of poverty, not patriarchal structures (Anderson & Davidson, 2003).

Although both groups of feminists have generated much criticism for their opposing and often very controversial approaches, this paper argues that this division has been instrumental in the development of laws and polices about the purchase, provision and facilitating of sexual services with direct impact on the demand and supply aspect of human trafficking (Gerassi, 2015). In addition, it also affects the process of prosecution because most law enforcement bodies tend to view prostitutes as criminals (Wilson & Butler, 2014). By contrast, INGOs generally consider these women victims. This victim-centric approach adopted by INGOs to fight trafficking in persons fails to identify women perpetrators amongst the victims.

The following discussion assesses the three Ps approach used by GAATW and CATW and discusses the extent to which it can shed some light on the role of women offenders.

#### **a) Prevention**

As anti-trafficking approaches of INGOs to prevention are victim-centric, the scope to introduce measures that help identify possible perpetrators is not recognised within the preventive measures of these two organisations. It is evident that the indicators used to identify and profile victims are quite progressive. However, they do not acknowledge the need to detect the perpetrators among them nor do they address the issue of women perpetrators who may be active in sex trafficking but can easily escape justice by portraying themselves as victims.

Awareness programmes are implemented by GAATW and CATW in countries of origin and destination. However, these programmes focus only on the vulnerability of women. It is critical that awareness programmes should also include information on women perpetrators, especially when many of these are in fact relatives or family friends of the victims. Methods that can help entrap victims so that women and girls can be more aware of the vulnerable situations should also be used. Even though INGOs are aware of the vicious cycle of sex trafficking which victimises and re-victimises exploited women, their discussion tends to focus on trying to prevent the initial victimisation.

**b) Protection**

Immediate services provided to the victims once they are identified are believed to be critical in helping them re-build their lives after trafficking. The focus needs to be on providing long-term assistance for sustainable results so that survivors can avoid being re-victimised and be re-integrated in their families and communities (Bearup, 2016).

Immediate services provided to victims are crucial in both countries of origin and countries of destination because of the difficulties victims may face regarding border policies, laws, and financial hardships. Failure to provide appropriate assistance may make survivors feel hopeless because, eventually, they will be sent back to their own families and communities. If re-integration programmes cannot meet the primary needs of victims, there is increased risk of re-victimisation because re-integration is particularly difficult for victims of sex trafficking since they tend to be ostracised. Therefore, most of them choose to go back to sex work rather than resettle in their own communities/societies (Mahat, 2011).

**c) Prosecution**

With regards Prosecution, anti-trafficking measures of both INGOs are victim-centric. The commonly held view that women are victims of human trafficking may encourage women offenders to continue trafficking other women. This situation is also more likely to benefit male criminals who can take advantage of women offenders who often occupy the lowest rank in the trafficking process and are therefore at greater risk detection and prosecution. This reality is not very surprising. As stated previously, research on women offenders is very scarce and often lacks the rigour and depth found in many studies on human trafficking in general. Furthermore, there is some evidence that criminal justice systems around the world tend to be gender biased. In other words, and as put forward by Pollak (1950), the theory of chivalry hypothesises that women are treated less harshly when committing the same crime as men. In particular, when it comes to crimes like human trafficking, women are more likely to be perceived as victims and not as offenders (Steffensmeier et al., 1993; Darrell et al., 1993). This theory is not without its critics, who believe that preferential treatment is based on the extent

to which women did not deviate from the more traditional gender roles they are expected to play (Herzog & Oreg, 2008). The absence of tools and good practices that equip the prosecutors with the relevant training and empowerment to address the problem of human trafficking is in itself indicative of normative, gendered judgments of women's involvement in this transnational crime.

Fundamentally, anti-trafficking approaches help victims get justice if they are willing to provide testimonies. In most cases, though, victims are usually detected only after they have been exploited in the sex industry. This makes it more difficult for women to come forward because they feel embarrassed and frightened (Herzog & Oreg, 2008). Victims that turn into perpetrators and perpetrators that choose to pose as victims to get an amnesty are rarely addressed in the process of prosecution. Even during the process of providing legal assistance to victims at different phases of recovery, organisational narratives do not include any information about the role of women perpetrators.

It is apparent that different NGOs and INGOs in general play a vital role in exploring and identifying the magnitude of the human trafficking phenomenon so that appropriate measures can be developed to combat the problem. Organisations such as the United Nations (UN), the European Union (EU), the International Office for Migration (IOM) and the International Labour Organization (ILO) work both internationally and regionally to combat human trafficking. However, there are numerous anti-trafficking NGOs and INGOs in different parts of the world that work locally on raising awareness, providing legislative or policy advocacy, vocational training and rescuing victims (Limoncelli, 2016). In the absence of government initiatives and assistance for trafficking victims, the work of some local NGOs is vital in identifying victims and meeting some of the needs of trafficking survivors (Tzvetkova, 2002). In addition, researchers from various disciplines also contribute to our understanding of the changing dynamics and trends in human trafficking, including its causes, consequences, and magnitude.

Apart from the approaches adopted that support victims and survivors of trafficking, since their establishment, both CATW and GAATW have continuously contributed to

advocating for the rights of trafficked victims. CATW is considered a pioneer in launching and advocating the definition of trafficking in the 2000 UN Protocol. In addition, it has consistently called on the United Nations to promote the rights of trafficked women. Today, it voices its concerns in the context of globalisation and the changing trends and patterns of migration. One of its most recent submissions to the UN includes “Oral Intervention by the Coalition Against Trafficking in Women (CATW) on 22 February 2019.” The submission urges the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) Committee to remind member states to address the social and cultural practices which “perpetuate the status of women and girls as subordinate to men and boys” (Office of the United Nations High Commissioner for Human Rights [OHCHR], 2019). The organisation also urged the committee to accelerate its efforts to fight gender-based violence which, it believes, is at the heart of the crisis of sex trafficking affecting women and girls. Furthermore, CATW has always promoted the Nordic Model (CATW, n.d.), which criminalises commercial sex by criminalising buyers so that prostitution is recognised both as violence against women and a violation of human rights. CATW also argues that prostitution is the root cause of sex trafficking and has therefore consistently been against all forms of sex trade around the world.

Similarly, and since it was first set up, GAATW has been engaged in a comprehensive global consultation process on prevention, protection, and prosecution of human rights. With its emphasis on research and advocacy as a main strategy to address human trafficking globally, GAATW has been publishing several global anti-trafficking reports. These reports highlight the various actions and challenges they face in their fight against human trafficking. In its efforts to help improve anti-trafficking measures, GAATW has published “Collateral Damage” which focuses on the negative impact of anti-trafficking measures that can lead to some victims of human trafficking having their rights violated (GAATW, 2007).

There is no doubt that both organisations are committed to adopting a human rights-based approach to their work. Both organisations also offer a comprehensive stance on human trafficking and its impact on women and girls. However, with their failure to consider the role of women as traffickers, GAATW and CATW are missing a crucial aspect of this global crime

that cannot be dismissed while working on combatting human trafficking in general and sex trafficking in particular.

## Conclusion

Feminist theorists have long highlighted the systemic discrimination against women as a vital part of their analysis. In highly patriarchal societies, in particular, women are often considered second-class citizens, subordinate to men. Within this less privileged status, women are therefore victims of gender-based violence and socio-cultural and economic discrimination. Human trafficking for the purpose of sexual exploitation flourishes in patriarchal societies that tend to believe that a woman's sole purpose is to please and service men sexually.

The social construction of human trafficking is such that it is impossible to separate it from the dominant gender stereotypes which discount women's agency. In other words, the exploitation of women as traffickers and as trafficked victims rely on and reproduce gender inequality.

The theory of neoliberal institutionalism, on the other hand, is also key in unravelling the significant role of institutions like the INGOs in this research. This theory argues that, to understand international affairs, one needs to focus on the role of international organisations and global governance and how they can get states to collaborate and cooperate. So-called soft power and collaboration between states and international organizations, like the United Nations and the World Bank, using international laws and procedures are deemed essential (Nye & Donahue, 2000). As such, and with the rise in globalization together with a whole host of global problems and concerns, no state or government entity can combat organised transnational crime like human trafficking alone. A global crime such as human trafficking requires global cooperation and action involving different stakeholders with different expertise and perspectives.

INGOs play a key role in addressing the needs of the victims of exploitation and of those who may be at risk, especially when governments lack the political will to respond to human trafficking (Tzvetkova, 2002). Even though much effort and support is being invested

in rescuing victims and prosecuting perpetrators, women (and girls) continue to be disproportionately affected by this crime, globally accounting for 72% of all victims (UNODC, 2018).

Nevertheless, the problem does not lie in existing anti-trafficking approaches (3Ps) of INGOs. It is evident that they have been successful in identifying the root causes of sexual exploitation of women. The problem is that INGOs fail to address the issue of women perpetrators who often come from similar backgrounds as the victims themselves. Since women perpetrators are not recognised within the discourse of INGOs, there are therefore no specific measures and/or indicators that separate victims of trafficking from perpetrators in the process of identification.

The lack of appropriate identification of women offenders in general can lead to two challenges. The first challenge is about identifying the circumstances that turn women into offenders. In other words, being able to separate women who become offenders because of exploitative circumstances from women who actually choose to adopt these roles. Women perpetrators should be punished for the criminal activities they have been engaged in. However, as former victims, they deserve to receive the protection and assistance they need in order to minimise the risk of being trapped in the vicious cycle of re-victimisation. Because the line that differentiates between victims of trafficking and women perpetrators is often blurred, the challenge to cover the grey area can be daunting.

The second challenge relates to women offenders who engage in this crime willingly and without having experienced sexual exploitation themselves. These women need to face justice for the crimes they have committed so that they cannot take advantage of existing loopholes, guise themselves as victims, and therefore escape prosecution.

In order to facilitate a just process of judicial system to identify and punish perpetrators, INGOs need to make the issue of women perpetrators an integral part of their work. The current anti-trafficking measures overlook the role of women offenders because the tools used during the prosecution phase generally focus on protecting the rights and dignity of women victims who are willing to testify against their traffickers. While this approach may

benefit victims in respect to their right to access justice, it overlooks the possibility of detecting women perpetrators who can themselves be victims of oppression and sexual exploitation.

Considering how important it is to include the issue of women offenders in any anti-trafficking response, this paper argues that INGOs have failed to address the problem of women perpetrators and consequently are incapable of influencing the transnational response to this serious crime. Disregarding the issue of women offenders in anti-sex trafficking narratives and actions can encourage more women to get involved in such criminal activities, as they tend to go unnoticed and therefore escape prosecution. Failure to give attention to women offenders might also result in deterring international organisations from cooperating with each other to design effective policies and strategies to help combat human trafficking.

The discourse on human trafficking has been mainly driven by ideological approaches rather than empirical and theoretical research. As such, there is a critical need for more focus on women offenders, which can help re-articulate the dominant discourse on human trafficking. Women offenders do not operate in isolation but are, more often than not, linked to male offenders. In other words, offending is at the heart of these social relationships and in particular those of an intimate nature (Wijkman & Kleemans, 2019). More needs to be done to have a much broader understanding of the realities and experiences of women in the sex trafficking industry and the important roles that governments, international organisations, and civil society can play in fighting this transnational crime.

Whilst model laws and best practices to tackle all four elements of human trafficking such as the 4Ps exist and are widely used, the fact that the issue of women traffickers remains under-researched means that no such practices have been developed as yet. One of the most important roles that organisations like GAATW and CATW should play urgently, as the paper suggests, is in identifying the issue of women perpetrators as a critical aspect in combating sex trafficking. A more open and holistic approach to women offenders, together with extensive in-depth empirical research, must go beyond the dominant gendered perspective. Such an approach must take into account a number of key indicators and factors including the structural aspects of the trafficking industry and its power dynamics, the wider socio-economic inequalities, and the multi-dimensional nature of women involved in trafficking.

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