

EMERGING TRENDS OF SEX TRAFFICKING IN NORTH-EAST INDIA AND ITS LEGAL CHALLENGES

Dr. Daisy Changmai¹ & Jayanta Boruah²

¹Guest Faculty of Law, National Law University and Judicial Academy, Assam, India

²Ph. D Scholar, North East Hill University, Shillong, India

ABSTRACT

One of the most inhuman practices in the twenty-first century is sex trafficking. Sex is a natural phenomenon that is essential for the continuity of the life cycle on this planet. Every living creature within the family of the sexual reproductive system follows the natural way of reproducing offspring through sex. However, the most rational creature of the planet has managed to convert rather transform this natural phenomenon into a man-made commercial venture, like prostitution, pornography, advertisements with sexual imageries, etc., where sex is bought and sold with commercial interest. With such activities, several other activities like abduction, kidnapping, harbouring, rape, abuse, etc., get associated most often to maintain the sex trade. India having a rich cultural tradition is also not an exception rather becomes a major market for the import and export of sex. North-Eastern states of India who remained in isolation for centuries possess several unique socio-political and economic conditions that make the region even more vulnerable against social menaces like sex trafficking. The paper, therefore, analyses the unique conditions of the north-eastern states in India along with the various International, National, and regional laws and policies for understanding the gap between such laws and policies and the actual requirements to meet the unique situations in the north-eastern region to eliminate sex-trafficking from this region.

KEYWORDS: Commercial Sex, Human Trafficking, North-East Region, Offence, Sex Trafficking, Victim

Article History

Received: 21 Apr 2021 | Revised: 23 Apr 2021 | Accepted: 07 May 2021

INTRODUCTION

Sex trafficking is a distinct form of human trafficking where mostly women and young girls are bought and sold forcefully for sexual pleasures. Although, such trafficking can take place irrespective of any gender differences, yet women are the major victims of such trafficking. At this growing phase of globalization, the sex industry has now become a backbone for many National economies and it attracts both National as well as Cross-border tourists. It is even alleged that a strong nexus between the iron triangle exist within the society that determines the supply and demand chains in the Sex industry. In traditional countries like India where prostitution, as well as pornography, is illegal to the extent of causing public indecency, it is obvious that such activities will be committed behind the scenes and in order to maintain supply for the ever-increasing demand for sex in the Indian sub-continent, the supply shall also be maintained for which sex trafficking becomes an important tool at the hands of the dealers. At present, instances of such sex trafficking are even increasing at a large scale in the North-eastern States of India which were mostly criticized for being isolated over a century but unfortunately could not remain isolated in matters relating to sex trafficking and supply of women across the world for

forceful prostitution. The socio-cultural situations and the political set up in the Northeast are very distinct from the rest of the country, for which the uniform National laws might not prove to be adequate in handling such matters in this particular region. Therefore, this paper will make an attempt to understand the issue of sex trafficking in the North-eastern States of India along with the nature of political and socio-culture setups of the region and the laws adopted for handling such issues.

CONCEPTUALIZING SEX TRAFFICKING

Trafficking is a very old practice that has prevailed in every society since ancient times in various forms. In India, trafficking for immoral purposes like prostitution is an old trade. In ancient India, prostitutes often called *ganikas* has occupied some special position in the king's empire. Not only that the practice of temple girl also prevailed during the olden days in Indian society. Under the tradition of *devadasi*, young girls are offered to the brahmanas in the name of God with a belief that by such offerings their life on the earth will be filled with happiness and prosperity. Even in the text of Arthashastras, Kautilya mentions prostitution and trafficking in person as a punishable offence. Trafficking in person especially women and girls for sexual slavery is a practice that has prevailed since time immemorial which takes a new form in modern times with the same old contents.

Sex trafficking that deals with the sex trade comes under the broader ambit of human trafficking. Human trafficking on the other hand is a wide concept that includes sex trafficking, forced labour, and organ trafficking, etc. Sex trafficking becomes a growing offence in the global rate, which is based on the elements of force, fraud, coercion, etc., for sexual exploitation irrespective of sex. Under this category of trafficking human values is a bargain with market profit. It is worthwhile to mention that women and children are mainly victimized in sex trafficking.

In the United States, the Justice for Victims of Trafficking Act, 2015 defines 'sex trafficking' as "recruiting, harbouring, transporting, providing, obtaining, patronizing, or soliciting of an individual by applying force, fraud, or coercion for the purpose of commercial sex". On the other hand, a commercial sex act means any sex acts that include prostitution, pornography, sexual tourism, or any form of sexual acts done for pecuniary interest.

The United Nations Palermo Protocol interprets sex trafficking in terms of three elements, that is, the act, the means, and the object. Hence, under the Protocol Sex trafficking is the act where human beings are recruited, transported, transferred, or harboured by means of threat, force, coercion, fraud, deception, etc., for sexual exploitation in order to achieve financial gain.

It is often said that sex trafficking is the oldest form among any other trade practice. Sex trafficking is such a trade that is practiced more or less in almost every country. It was originally commenced under vivid conditions of migration, low economic conditions, in search of employment opportunity, natural disaster, etc. Today in the age of globalization, sex trafficking continues even at a much higher rate than ever before and that creates a global hub of trafficking. It becomes a transnational crime in which people are often transported from undeveloped countries to developed countries. There are some countries where sex trafficking is legalized in order to check the number of these menace and also to protect the human rights of the sex workers. But in reality, it results completely inverse to what is expected.

Victims of Sex Trafficking

Victims of sex trafficking may be anyone – men, women, children, transgender, etc., from any caste, creed, or gender. There is no specific categorization population for the traffickers for choosing their hunt. Women and children are undoubtedly easy prey for the traffickers. Traffickers often convinced women by promising lucrative jobs and comfortable life and then force them to sell themselves against their consent. Likewise, children aged around 10-14 years are usually picked up for prostitution or forced sex.

Sex trafficker often traps people by taking advantage of their vulnerable condition, hence, they target people who are underprivileged, economically weak, etc. Following are the categories of people who are often victimized by the traffickers for their unlawful trades –

- **Distressed Socio-Economic Background:** Many a time, the poor economic condition also encourages people to accept the lucrative offers extended by the perpetrators. Low income of the family, lack of basic education, hunger, malnutrition, etc., forced numerous people to indulge in sex trafficking.
- **Troubled Childhood and Homeless Youth:** Children from the disturbed family background are easily susceptible to this crime. Very often children of separated parents who are deprived of parental care, or children brought up in families where they are regularly beaten by drunken fathers and who have been witnessed the violence in the family or abandoned children, etc., become vulnerable to trafficking.
- **Victims of Discrimination:** Gender discrimination is a common phenomenon in our society even today. Very often freedom of women and children is curtailed and suppressed under the norms of gender. They cannot decide their terms of life and spend their life under the orthodox bindings of casteism.
- **Natural Disaster Effected:** Sometimes natural calamities, as well as man-made disasters, compels to migrate people from one place to another and also give rise to a number of homeless people. These migrants and homeless people very often deceive the traffickers to get a permanent settlement and secure life.
- **Marginalized Section of the Society:** People from the marginalized section of the society who are the victim of social stigma, discrimination, and living below the poverty line, deprived of their basic amenities are easily surrendered in the hand of predators.
- **Tribal Inhabitants of Border Areas:** Number of people who inhabit remote areas, e.g., tribal people near borderlines who are still in the darkness of ignorance and deprived of basic facilities of life become vulnerable to sex trafficking.
- **People from Conflict Areas:** Often people living in conflict-prone areas or in areas where terrorism made life hell, people migrated to other places in search of a better future. These migrant people often unknowingly fall into the trap of the traffickers.

Sex Traffickers:

Person deals with sex trafficking may belong to any caste or creed or any nation. Basically, sex traffickers are those persons who recruit or transport people by means of force or fraud, or coercion in commercial sex. Commonly, sex traffickers take advantage of the various condition of the victim and deceitfully involve them in the sex racket. Traffickers used to establish a wide network for their business and run the racket intrastate as well as interstate or

globally. Moreover, there is an international hub of sex trafficking where human beings are auctioned and sold like cattle.

SEX TRAFFICKING IN NORTHEAST INDIA

In recent years sex trafficking has been increasing at an alarming rate in North-East India. Young people are transported through the Indo-Myanmar border to different gulf countries where they are forced to adopt prostitution. In May 2019 Manipur state police rescued a group of 180 Nepali women from the border who are supposed to deport to Dubai and many other gulf countries.

North-east has become a growing hub for sex trafficking because of its border which is surrounded by an international border of China, Bhutan, Myanmar, and Bangladesh. Traffickers use these borders to transport people wherefrom deport them to foreign countries. One of the advantages of using the route through the North-east is that it is still not under the vigilance of government, hence, people can be easily transported to the neighbouring countries which makes this region become a hotspot for the commercialization of sex activities.

Although North-East is achieving remarkable growth gradually, there are still some areas that are a million miles away from the values of civilization. Traffickers mostly opt for those areas to fulfil their illicit purposes. In the remote areas of the region, abduction, disappearance of young girls and children occurred every now and then; traffickers seem to involve in such unlawful means in order to run their business. In most cases, these young women or girls are supplied to big cities where they are handed over to brothels. In recent times thousands of such young girls who belong to the North-East are rescued from different parts of the states in India.

Trafficking human beings for commercial sex is deemed to the third-largest industry in the world. It is estimated that 1200050000 women and children are trafficked annually for the sex trade. Almost 10001500 children are smuggled to Arab countries for the sex trade every year. Moreover, young girls and brides are trafficked to Haryana and Rajasthan from the villages of North-East for producing mail heirs. India is the highest bidder of commercialization of sex trafficking wherefrom thousands of persons transmitted to all over the world. Similarly, sex trafficking is also rising in the North-east states but is overlooked by the centre.

Worldwide 1.2 billion children are forced into sexual slavery every year. In India, the rate of trafficking is increasing day by day which makes India the most unsafe country for women ahead of Afghanistan, Syria. In the year 2016, 8132 cases are reported whereas in 2015, 6877 cases registered in the country on human trafficking as compared to 5466 cases during the year 2014. Sex trafficking in the North-east region is growing steadily sharing a good number in the total rate of trafficking in India. In the state-wise statistics revealed by the National Crime Record Bureau, the state of Assam shares 1.12 %, Manipur shares.04 %, Meghalaya shares.09 %, Mizoram.02 %, and Sikkim contributed.01 % in the total number of reported cases of sex trafficking. According to sources, the growth of trafficking in Assam is highest compared to its sister states of North-east. Assam is also named for the highest child trafficking in the country which records 38 % of the total figure. During the year 2011 to June 2017, 895 cases of human trafficking registered under Sec. 370 and 370-A of IPC and almost 1185 people trafficked in Assam alone and of the 722 people rescued from different parts of the country. It is very difficult to find out the precise number of women and girls indulged in sex trafficking.

SOCIO-CULTURAL AND POLITICAL SET UP IN THE NORTH-EASTERN REGION

The geographical location of the North-East Region is peculiar compared to the rest of the country. The region is mostly covered by hilly areas which are connected to the country through a chicken neck corridor and share its borders with international countries. The region often in the headline of the leading newspapers for its low progress, economically backward position, poor infrastructure, severe impact of natural calamities, and insurgency problems, etc. The region is a native land of several ethnic tribes and is fully dependent on an agri-based economy. There is a lack of unanimity among the tribes and their claim for an autonomous region often leads to unrest situation in the region. Moreover, the frequent occurrence of ethnic conflicts badly affects the growth of the NER.

Insurgency is a burning problem of the North-East Region which leads to the seclusion of the region from the mainstream. Most importantly, insurgency in the NER has been growing because of the helping hand from neighbour countries. It is one of the reasons behind the poor socio-economic growth of the region. There is a weird impression about the locality and people of the NER because of which people from the rest of India are not willing to pursue their careers here.

Most of the time this region is overlooked by the Central Government because of the political rivalry with the ruling party in state. Packages of development rarely touch the zone and those grants that somehow reach are not implemented fully. Even large entrepreneurs are reluctant to support the small industries that prevailed in the region as well as extend their business therein. The region is abundant with many small industries having a high potential of prosperity, but due to lack of attention, many such industries are presently at a morbid stage.

Many a time, legislation passed by the Central Government did not properly applicable to this region because of the peculiarity of the region. Not only that even the representative of the states has failed to represent the issues of the region in the Parliament; as a result of that people are deprived of privileges as well as the attention of the Centre. People assume that the struggle for life and survival becomes their fate.

The region is still backward in position and many people are ignorant of government provision of free education, basic amenities, health especially reproductive health, etc. Children's involvement in factories, establishments, etc., for the well-being of the family, is a common incidence. Rashtriya Education Mission, like Sarva Shiksha Abhiyaan, etc., has not yet reached many remote places. Under such a situation, people easily fall into the trap of perpetrator and becomes a victim of trafficking and sexual exploitation.

INDIAN LEGAL FRAMEWORK

Sexual trafficking is a serious menace of society that needs to be weed out from its root. It is therefore utmost importance to analyze here the legal measures under Indian Legal Jurisprudence. In India, the Constitution of India being the basic law of the land has put much importance to curb this inhuman practice since long. Addressing the issue the legislature also extends its protection through enacted legislation. Available measures under the Indian legal framework are as follows:

Under the Constitution of India

The Constitution of India provides its citizens with fundamental rights to ensure justice, equality, and dignity in all spheres of life. Along with the right to equality and freedom, it also guarantees the right against exploitation. Articles 23 of the Constitution declares the practice of trafficking in human beings as unconstitutional and any kind of contravention of such

prohibition deemed to be an offence under the provision for which it may impose punishment in accordance with the law. Article 23 protects citizens not only against the state but also against a private person. Further, Article 35 empowers Article 23 to make laws for punishing the offence prohibited under the provision. In pursuance of Article 23, the Indian Parliament passed the Immoral Traffic (Prevention) Act, 1986 to combat, prevent and prohibit trafficking.

Besides, Article 39(e) though not specifically speak about human trafficking, ensures protection against forceful incorporation in any establishment under the dire economic necessity. Likewise, Article 39(f) gives directions to the states to take necessary measures against exploitation and moral and material abandonment children and youth.

Under the Statutory Provisions

The exploitation of women and girls for sexual pleasure is a common practice since ancient times. However, very little effort was taken to combat this trade practice. A genuine effort was made by passing the Bombay Prevention of Prostitution Act, 1923 which empowers the authority to rescue minor girls from the trap of traffickers and impose penalties. This Act was considered the first of its kind to spread awareness among the people about the evil practice. Thereafter, many such laws were passed at the regional level in several states. Some of the major initiatives taken by the Government of India are as follows:

- **Immoral Traffic (Prevention) Act, 1986**

In view of the growing rate of the criminal sexual trade, the Law Commission of India in its Sixty-Fourth Report explains the government about this evil practice growing rapidly in the country taking advantage of the vulnerable condition of the women. Accordingly, the Law Commission of India had drafted the Suppression of Immoral Traffic in Women and Girls Act, 1956. The Commission while drafting the Act keeping in mind to protect the women and girls from sexual exploitation for immoral purposes. The reason behind passing this enactment is that the Indian Government aims to bring into effect the Convention for the Suppression of Traffic in the persons and of the Exploitation of the Prostitution of Others, 1950 held in New York and the constitutional mandate of Article 23. It is worth mentioning that the convention in order to suppress trafficking prescribes a procedure for combating international prostitution as it proclaims that human trafficking for an immoral purpose like prostitution is incompatible with the dignity and worth of being human. Later on, this Act is amended, and with necessary changes, the new Act is known as the Immoral Traffic (Prevention) Act, 1986. The Immoral Traffic (Prevention) Act, 1986 is a central legislation enacted with the prime object to abet commercial sexual exploitation or prostitution. The Act did not define the term trafficking but deals with trafficking in person by means of prostitution. Under the Act, penalties are provided for keeping a brothel or using any premises as a brothel. Moreover, procuring, taking, or inducing any person for prostitution; or detaining or soliciting a person for prostitution, etc., are punishable offences under the Act.

- **Criminal Amendment Act, 2013**

In view of the growing sexual offences in the country and huge agitation among the common people for the prevention of offences against women, the Government of India constituted the Justice Verma Committee with the responsibility to suggest law reforms to meet the necessity. The first major step taken by the committee is the incorporation of the definition of the term “human trafficking” in Sec. 370 of the Indian Penal Code. The definition is mainly derived from the UN Trafficking Protocol, but in their definition, the expression “abuse of power or position of vulnerability” and “giving and receiving benefit to achieve consent” is omitted as the committee found these two phrases are per se, not offence. In addition, the committee incorporated Sec. 370-A and under both the provisions, it tries to emphasize trafficking as offence

in connection with the traditional offence.

The committee shows its deep concern for thousands of children who are missing every year under the banner of trafficking. It refers to the case of *Horilal v. Commissioner of Police, Delhi* where the court laid down exclusive guidelines for addressing the issue of missing children for implementation to prevent child trafficking for sexual exploitation.

- **Immoral Trafficking (Prevention, Protection and Rehabilitation) Bill, 2018**

The bill came with the purpose of introducing legal provisions to bring all kinds of trafficking within its ambit and also to rescue, protect and rehabilitate the trafficked victims. The bill brings about some of the important features –

- It incorporates the definition of trafficking as, (i) recruitment, (ii) transportation, (iii) harbouring, (iv) transfer, or (v) receipt of a person for exploitation, by using certain means.
- It introduces a new term “aggravated trafficking” to define certain types of trafficking.
- The bill also emphasizes setting up various authorities to deal with rescuing victims and investigating trafficking.
- The bill requires the setting up of protective homes by the appropriate government for protection and rehabilitation of trafficked victims, etc.

However, this bill came up after the ratification of the United Nations Convention Against Transnational Organised Crimes, 2000, including its Protocol to Prevent, Suppress and Punish Trafficking in person by India in 2011.

- **Initiative Taken by the Government of India**

In view of the emerging practice of sex trafficking, the Ministry of Women and Child Development (MWCD) formulated a national action plan to combat Trafficking and Commercial Sexual Exploitation of Women and Children as well as to integrate the victims of trafficking back to the mainstream. The Ministry also constituted a Central Advisory Committee and published protocol for pre-rescue, rescue, and post-rescue handling of the victim of sexual trafficking. In addition, for a better understanding of the situation of trafficking and taking timely measures, it stresses providing training to all stakeholders such as police, government officials, etc.

Further, the MWCD maintains Shelter based homes Short Stay Homes, Swadhar Homes for women in difficult circumstances and to combat cross-border trafficking the Ministry in collaboration with the Ministry of External Affairs has endeavoured to create special task forces.

From the above discussion, we can conceive that to combat the hazards of sex trafficking a good number of the initiative has been taken under Indian legal framework, but those laws seem to be insufficient when the issue is related to the North-east. To get a more fruitful result, a special monitoring mechanism is the need of the hour.

INTERNATIONAL FRAMEWORK TO COMBAT WITH THE TRAFFICKING

The Universal Declaration of Human Rights has been credited for changing the idea of human rights and as a result, many efforts have been made to protect and promote the human rights of every individual in order to ensure a life of equality and dignity. The first-ever attempt to protect victims of trafficking was taken by the General Assembly of the United Nations was that of the **Convention for the Suppression of Traffic in the persons and of the Exploitation of the Prostitution of Others, 1949** which enforced in 1951. The convention came with the purpose of prevention of prostitution and any evil

practice of human trafficking which is incompatible with the dignity of the human person and endanger the welfare of the family, society, etc., and also to suppress trafficking in women and children.

The United Nations Convention Against Transnational Organised Crimes, 2000, including its Protocol to Prevent, Suppress and Punish Trafficking in person is another major initiative in the international arena to abet trafficking for commercial sexual exploitation. The Protocol to the convention popularly known as the Palermo Protocol is very significant as it for the first time defined the term “trafficking in person”. It is very important to have an appropriate definition of a particular subject to bring it within the purview of the law. Prior to the Palermo Protocol, the world community fails to come to a consensus to define human trafficking.

The United Nations Office on Drug and Crime (UNODC) is determined to eradicate crime relating to human trafficking and migrant smuggling. It acts as a guardian to UN Protocol to Prevent, Suppress and Punish Trafficking in person and assists the state parties in the implementation of the rules. Besides, UNODC has the responsibility to the systematic collection of data in global rate on trafficking in person for a decade and made a report on it.

International laws are very focused on the matter of elimination of the malicious practice of sex trafficking. It is advisable for the North-east states to use the roadmap to get rid of the most inhuman practice of the modern time.

CASE STUDY ON SEX TRAFFICKING

Some of the landmark judgment by the Supreme Court on sex trafficking on child among other is discussed below –

- In *Bachpan Bachao Andolan v. Union of India*

The Supreme Court established the children’s right against exploitation in answering a petition seeking action against the child performer in a travelling circus. The Court reaffirmed that child performers are mostly physically or mentally abused in most instances.

- *Pramod Bhagwan Nayak v State Of Gujarat*

In this case, the highest Court shows much concern for the health and well-being of the children rescued from the trap of trafficker and direct the state government to make necessary arrangement for rehabilitation of the victims.

- *Court on Its Own Motion v State*

In this case, the statistics shown reveal that percentage of the missing children is increasing since 2006 through 2010, in all age groups, viz. 0-8 years (2 % to 13 %); 8-12 years (3 % to 26 %) and 12 to 18 years (5 % to 26 %). The High Court of Delhi suggested that services of the special wing namely “Special Unit for Women and Children” should be availed to deal with post rescuing counselling, etc.

The above-discussed cases are only a few to name to reflect the horrific originality of trafficking in India which is mushrooming day by day.

SEX TRAFFICKING IS GLOBAL TRANSMITTER OF HIV/AIDS

Human trafficking for commercial sex is a facilitator of HIV. Very often, traffickers exposed the victims to different customers. In between this circulation, if a victim somehow gets infected by HIV, they hardly receive any treatment for that afterward. And when such a victim with the disease again comes in contact with another customer, she becomes the

transmitter. There are many such instances where knowingly or unknowingly a victim of sex trafficking transmits the disease to several persons.

Commercial sex in fact acts in escalating HIV worldwide. HIV becomes dreadful if proper care, medication, and treatment are not taken in time and trafficking victims have undergone similar circumstances under the lack of access to health, education, and exposure to re-trafficking. The situation is more intimidating when the trafficking victim with HIV is transported and sold in countries other than the domicile country. Henceforth, sex trafficking may be a catalyst to a global pandemic.

CONCLUSIONS

Trafficking in person for commercial exploitation is like an epidemic in society. Sex trafficking is a global issue growing rapidly affecting several new areas. Sex trafficking is growing unnoticeably at a very dangerous proportion in the North-east. Undoubtedly, several measures have been taken to tackle the rampant practice of sexual trafficking at all regional, national and international levels, but no measures resulted in a permanent solution to the problem. Many a time, such laws did not even touch the boundaries of the North-east. It is probably due to the lack of an appropriate mechanism for enforcement of laws and regulations both at the regional as well as the municipal level and international level, this evil practice is building a huge international network market. Moreover, the socio-economic condition of the North-east somehow fuels the swift growth of this menace. In the given situation, it is advisable to address the root causes of the issue namely, poverty, illiteracy, the prevalence of age-old evil practices like child marriages, low status of women and girls in society, etc., The Ministry of Women and Child Development which is responsible to deal with this issue can provide vocational skill and training programs for women and girls rescued from trafficking in addition to awareness programmes.

REFERENCES

1. *ILO Press Release, Sex Industry assuming massive proportions in South-East Asia, ILO, (Mar 24, 2021, 01:12AM) retrieved from https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_007994/lang-en/index.htm. (1998)*
2. *Singh Umesh Kumar. Immoral Trafficking of Girls and Women in Ancient India, Proceeding of the Indian History Congress, 2007, Vol. 68, 162-178*
3. *Sex Trafficking retrieved from <https://humantraffickinghotline.org>*
4. *Sex Trafficking- Human Trafficking for Sex, retrieved from <http://www.endslaverynow.org>*
5. *Weatherbum Amy. The effect of political and socio-economic factor on Human Trafficking. Conference on Current and Future Trends of Human Trafficking in Europe. November, 2015*
6. *Kabra Abhishek. Human trafficking was a big problem in the Northeast. COVID-19 has made it much worse.2020, 18th Nov. Retrieved from <https://www.eastmojo.com>*
7. *Sharma Dinesh. Alarming cases of Human Trafficking via NE States is worrisome. 2019 1st May. Retrieved from <https://www.eastmojo.com>*
8. *Kharbhih Hasina. Human trafficking in the Northeast: a horrid truth that remains unacknowledged. 2017 17th Oct. retrieved from <https://yourstory.com>*

9. *State of Human Trafficking in India and Existing Government Mechanisms*, retrieved from www.swaniti.in
10. *8132 cases of human trafficking reported in 2016, average 63 victims rescued a day*, retrieved from <https://www.hindustantimes.com/india-news>
11. *The Convention for the Suppression of Traffic in the persons and of the Exploitation of the Prostitution of Others*, retrieved from <https://ec.europa.eu>.
12. *Sec. 370: Trafficking of person*
13. *Sec. 370-A: Exploitation of a trafficked person*
14. *W.P. (Crl.) 610 of 1996*
15. *Human Trafficking*, retrieved from <https://vikaspedia.in>
16. *Cherif M. Bassiouni, et al., "Addressing International Human Trafficking in Women and Children for Commercial Sexual Exploitation in the 21st century", Dans Revue Internationale de droit Pénal 2010/3-4 (Vol. 81), 417 à 49*
17. *Overview of the Work of UNODC in relation to Organized Criminal Activities*, retrieved from <https://www.unodc.org>
18. *(2011) 5 SCC 1*
19. *(2007) 1 GLR 796*
20. *W.P.(CRL) 249/2009*