



The Role of Female Offenders in Sex Trafficking Organizations

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1. Introduction and Theoretical Frame: Challenging the Master Narrative

“I’ve never seen an issue where there is less interest in hearing from those who are most affected by it.”¹

- Phil Marshall, UN Project Manager on Human Trafficking at South-East Asia

The professional and public discourse over sex trafficking has for long been dominated more by ‘myth-based’, and not uncommonly ideologically motivated ‘master narratives’ rather than pragmatic approaches based on solid empirical results.² Promoted predominantly by anti-trafficking non-governmental organizations, by the very actors whose role would be pivotal in the tackling of the problem, these anecdotal accounts would employ emotional appeal for the sake of maintaining the public’s ever-dwindling attention on the issue. But at the same time these oversimplified claims unjustly disavow the public and policy makers from grasping the complexities of the issue, leading to flawed responses and to the continued pervasiveness of this shameful form of slavery in the 21st century. Fundamental deficiencies of these narratives are, firstly, their failure to distinguish voluntary sex work from forced sex slavery (aggravated by the confusing definition of the ‘2000 Palermo Protocol’ itself) and secondly their deficiency in considering and addressing the structural causes.³ Moral approaches, pursued by radical feminist and religious groups, see all forms of sex work as exploitative and degrading in which females are categorically non-autonomous.⁴ Their denial of women’s agency overlooks their morally often confusing inter-organizational roles and the intricate relations between victims and perpetrators. Hence the outrage of sex workers over the indiscriminate ‘rescue raids’ which often fail to find ‘victims’ or ‘perpetrators’ while, albeit unwittingly, disrupt delicate communal networks and expose those involved to humiliation and psychological trauma.⁵ Differently, pro-sex work advocates, considering the

¹ Maggie Jones, ‘Thailand’s Brothel Busters’ (Mother Jones, 2013)

<<http://www.motherjones.com/politics/2003/11/thailands-brothel-busters>> accessed 13/12/14.

² Edward Snajdr, ‘Beneath the master narrative’ (2013) Vol. 37 Is. 2 *DA*; Dina Siegel, Sylvia de Blank, ‘Women who traffic women’ (2010) Vol. 11 Is. 4 *GC* 436; Elżbieta M. Goździak, ‘Empirical Vacuum: In Search of Research on Human Trafficking’ in Rosemary Gartner, Bill McCarthy (ed), *The Oxford Handbook of Gender, Sex and Crime* (Oxford University Press, Oxford 2014) 613-614.

³ On the ambiguity of the ‘Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children’ see: Conny R. J. J. Rijken, Dagmar Koster, ‘A Human Rights Based Approach to Trafficking in Human Beings in Theory and Practice’ (Social Science Research Network 2008) 3, <http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1135108> accessed 13/12/14; Bernadette McSherry, Susan Kneebone, ‘Trafficking in Women and Forced Migration’ (2009) Vol. 12 No. 1 *IJHR* 69-73.

⁴ Eva Lo Iacono, ‘Victims, sex workers and perpetrators’ (2014) Vol. 17 Is. 1-2 *TOC* 113.

⁵ Sealing Cheng, ‘Good Intentions Can Do Harm’ (Korea Times 2004)

<<http://www.iswface.org/goodintentions.html>> accessed 13/12/14; Dana Bruxvoort, ‘The Untold Side of Raids and Rescues’ (Human Trafficking Center 2014) <<http://humantraffickingcenter.org/posts-by-htc-associates/the-untold-side-of-raids-and-rescues-re-thinking-anti-trafficking-efforts/>> accessed 13/12/14; Zbigniew Dumieniński, ‘Myths and Realities of Human Trafficking’ (2012) Vol. 2 No. 1 *IPS* 62.

commodification of sex as a viable, even empowering way for women to making a living, fail to fathom the pervasive power of socio-economic-gender-racial-familial pressures and inequalities, which often leave little room for maneuver to the impoverished and marginalized.⁶ Hence the unlimited supply of increasingly willing sex workers or the return of rescued victims to their brothels in absence of alternatives.⁷ Considering the focus-point of policy responses, a widespread flaw is further exposed in the United States' 'Trafficking Victims Protection Act (2000)'.⁸ Being one of the principal tools in combatting sex and human trafficking globally, it primarily emphasizes the strengthening of national law enforcement measures, while economically sanctioning non-complying nations. While human trafficking remains being considered a low risk/high yield criminal enterprise in need for the strengthening and fine-tuning of the rule of law, experts, interviewed victims and traffickers all considered these measures as the least effective way of addressing the issue.⁹

In this spirit, contrary to the above outlined metanarratives our study wishes to contribute to the pool of resources by exploring the complex, morally often confusing motives and statuses of women involved in sex trafficking by: (1) mapping their pathways to becoming sex traffickers, (2) exploring their often controversial roles and motives within the organizations and (3) by describing the deficiencies in law enforcement measures by considering the difficulties in acquiring testimonies from victims, as well as the still pervasive gendered stereotypes during the phases of identification, arrest and prosecution of female criminals.

2. Women's Pathway to Becoming Sex Trafficking Offenders

2.1. Victimization

Before tracing women's pathways to becoming offenders it is crucial, for the sake of better grasping the linkages between women's agency and the 'push and pull' social fetters which exert a great restraining force on their deliberations, to outline how women become involved in sex trafficking as victims, and subsequently as potential perpetrators. Most prevalent modes of victimization can be distinguished into three categories.¹⁰

⁶ Lo Iacono, *supra note 4*, 113-114.

⁷ Bruxvoort, *supra note 5*.

⁸ Jones, *supra note 1*.

⁹ Siddhartha Sarkar, 'Rethinking Human Trafficking in India' (2014) Volume 103 Is. 5 *TCJIA* 3; Chenda Keo, *Human Trafficking in Cambodia* (Routledge, Oxon, New York 2014) 28.

¹⁰ Andreas Schloenhardt, Genevieve Beirne, Toby Corsbie, 'Trafficking in persons in Australia: myths and realities' (2009) Vol. 10 Is. 3 *GC* 229.

The first category includes those who deliberately submit themselves to the exploitative, humiliating conditions of sex work. An anomalous practice among the heavily indebted and/or extremely impoverished, further compounded by discriminatory bio-politics, some families (notoriously of the Southeast-Asian region) would send off or appeal to their female members (often underage) to become sex workers.¹¹ In many instances, these victims are well-aware of their condition and while considering it undesirable, they refuse to self-identify as victims, instead regarding themselves as dutiful members of their family only doing what is expected of them for the sake of their survival.¹² Thus, these women, exercising a very limited agency, supposing they are mature, can be considered more the victims of their own socio-economic conditions and familial expectations rather than of exploitative sex traffickers who merely tap the discontents of the socio-economically marginalized. Ambiguously, the number of positive accounts on traffickers and reports on surprisingly solid conditions at brothels suggests the normalization of the practice.¹³ Still, these women, once having become the subjects of traffickers nevertheless may experience abuses, threats, coercion or deceit.

The second category of victimization is prevalent among those in full possession of their agential capacity, willingly deciding to become sex workers as a means of socio-economic advancement, only to find themselves deceived about the conditions, ending up shackled in debt bondages or in a generally different environment than expected.¹⁴ Migration theorists have pointed out how globalization, while having a detrimental effect on some layers of the societies of third world countries, also adds, through intercommunal networks and information spreading, migration as an alternative to advancement for their citizens.¹⁵ One's own socio-economic position is thus assessed in relation to foreign, prevailingly Western standards. The information, however seldom being perfect, gives rise to the conceiving of false and misguided images of the "glamorous West" represented as a place where making a genuine living is fast and easy.¹⁶ The appeal of sex work as a viable or even desirable,

¹¹ Keo, *supra* note 9, 26-27, 167-168 ; Sarkar, *supra* note 9, 486; Ashley G. Blackburn, Robert W. Taylor, Jennifer Elaine Davis, 'Understanding the Complexities of Human Trafficking and Child Sexual Exploitation: The Case of Southeast Asia' (2010) Vol. 20 Is. 1-2 *WCJ* 107.

¹² Lisa Sanchez, 'Gender Troubles' in Claire M. Renzetti, Lynne Goodstein (ed), *Women, Crime and Criminal Justice* (Roxbury, Los Angeles 2001) 66; Blackburn, *supra* note 11, 115-116.

¹³ Blackburn, *supra* note 11, 117.

¹⁴ Minna Viuhko, 'Human Trafficking for Sexual Exploitation and Organized Procuring in Finland' (2010) Vol. 7 No. 1 *EJC* 69-70; Korin Lebov, 'Human Trafficking in Scotland' (2010) Vol. 7 No. 1 *EJC* 82; Kamala Kempadoo, 'Victims and Agents of Crime: The New Crusade Against Trafficking' in Julia Sudbury (ed), *Global Lockdown: Race, Gender and the Prison-Industrial Complex* (Routledge, Oxon, New York 2005) 38.

¹⁵ Keo, *supra* note 9, 145-146, 166-167.

¹⁶ Viuhko, *supra* note 14, 68; Dina Siegel, 'Mobility of Sex Workers in European Cities' (2012) Vol. 18 Is. 3 *EJCP* 259-260, 267.

adventurous way of achieving social improvement is further compounded by the West's aptitude to glorify the sex industry as the paved road to luxury, resonating well among those wishing to leave behind their intolerable or undesirable environments. These women, imbued with romantic notions and being well (mis-)informed about their opportunities make an easy target for sex traffickers ready to exploit their passions with little need to resort to force.¹⁷ Many of these victims however, even after having found themselves deceived decide to endure and persevere instead of exiting (providing they are allowed to and do not end up being trapped) as they often still consider their not-quite-what-expected circumstances preferable to what their home country has to offer.¹⁸

The victims of the third prevalent form of victimization exhibit many similar characteristics (socio-economic vulnerability, yearning for a better life) with those belonging to the previous two groups, but these victims find themselves completely deceived about the very nature of work they are to undertake.¹⁹ Often allured by family members, friends or other women by the promises of well-paying and non-degrading jobs at beauty salons, massage parlors, modelling agencies or by the opportunities for foreign education, these victims once arriving to their destination find themselves enslaved and forced into sex work.²⁰ Usually, the more impoverished the more these victims lack the sufficient knowledge on recognizing these deceptive traps.²¹

Conclusively, societal pressures, dissatisfaction with one's economic position or having a general resentment towards one's home environment are primary inducing factors to becoming entrapped in potentially exploitative situations. Thus gender, cultural, social, economic and political discrimination against women in their home countries (push factors) often coupled with a romantic yet misguided sense for attainable emancipation in the West (pull factors) compounded by the lack of awareness on the manipulative strategies of traffickers may prompt women to willingly undertake potentially perilous endeavors.

¹⁷ Rebecca Surtees, 'Traffickers and Trafficking in Southern and Eastern Europe' (2008) Vol. 5 No. 1 *EJC* 50; Rijken, *supra* note 3, 6.

¹⁸ *Ibid*, 58; Siegel, *supra* note 16, 258-259; Oguzhan Omer Demir, 'Methods of sex trafficking: findings of a case study in Turkey' (2010) Vol. 11 Is. 3 *GC* 329; Jorn Johannes Marinus van Rij, 'The trafficking and sexual exploitation of native Hungarian speaking women in the Netherlands' (PhD Dissertation, Pécsi Tudományegyetem 2014) 16.

¹⁹ Lynellyn D. Long, 'Trafficking in women and children as a security challenge in Southeast Europe' (2002) Vol. 2 Is. 2 *SEBSS* 58.

²⁰ Tatyana A. Denisova, 'Trafficking in women and children for purposes of sexual exploitation: The criminological aspect' (2001) Vol. 6 Is. 3-4 *TOC* 33.

²¹ Keo, *supra* note 9, 28.

Furthermore, many would endure degrading and exploitative conditions in absence of alternatives (job, social safety net) or due to difficulties in societal reintegration.²²

2.2. Women's Pathways to Becoming Offenders: Female Criminology

With the rise of emancipatory feminist discourses during the '60s and '70s there has been a gradually expanding academic discourse on female criminology.²³ However, the 'why's and 'how's, especially with respect to women's involvement and role in sex trafficking organizations still lacks substantial professional discourse and empirical scrutiny. Gender stereotypes thus remain pervasive with women being considered as inherently on the victim's side in crimes as being non-autonomous and passive only to hinder effective counter-measures.²⁴ Attempts to explain the increasing propensity for crime by women primarily focus on the linkages between their progressive gaining of independence embedded in environments where however genuine emancipation is still widely impeded by discriminatory gendered practices. In these cases the burden of self-sufficiency and the simultaneous hindrance on their access to legitimate opportunities may give rise to anomalous behaviors for the sake of survival. Below two prevailing pathways for women to become sex traffickers are mapped to highlight these strains.

2.2.1. Indirect/Direct Involvement

The already outlined push and pull factors that make women vulnerable to victimization reappeared during the tracing of women's pathways to crime. However, their propensities to becoming traffickers are often further influenced by additional factors. On the first pathway, these include the familial environment and/or the presence of an influential male partner involved in the criminal underworld, sometimes being aggregated by plainly selfish economic considerations. The family upbringing has a great impact on the developments of moral and psychological capacities increasing the potential for criminal behavior.²⁵ A troubled family background with physical or sexual abuse, drug and alcohol addiction or simple emotional and pedagogical neglect by parents may lead to the developing

²² Demir, *supra note* 18, 316.

²³ Claire M. Renzetti, 'Feminist Perspectives in Criminology' in Walter S. DeKeseredy, Molly Dragiewicz (ed), *Routledge Handbook of Critical Criminology* (Routledge, Oxon, New York 2012) 132-135.

²⁴ Samuel Vincent Jones 'The Invisible Women: Have Conceptions About Femininity Led to the Global Dominance of the Female Human Trafficker?' (2014) Vol. 7 Is. 1 *AGLR* 151-52.

²⁵ Kathleen Daly, *Gender, Crime and Punishment* (Yale University Press, New Haven, London 1994) 43-61; Mary E. Gilfus, 'From Victims to Survivors to Offenders: Women's Routes of Entry and Immersion into Street Crime' (1992) Vol. 4 Is. 1 *WCJ* 70-78.

of traumas unfolding its effects at a later age. Uncaring households failing to provide basic needs (food, clean clothes) may induce embarrassment and lead school-skipping among their children who often end up finding ultimate refuge on the street, unable to further bear their abusive environments or deal with their sense of shame. Here, however, a wide range of dubious characters from petty criminals to pimps/traffickers are ready to exploit the languishing yearn for caring of these astray teens. The genuine love or fake charm of these males can get appealing to many women, who soon find themselves not only emotionally but also materially dependent on them.²⁶ Here develops a complex relationship: Due to their extreme vulnerability, women may become interested in encouraging, assisting or even cooperating in the trafficking business as their sole apparent means of survival.²⁷ Thus, the line between victim and perpetrator is blurred: Many undertake illegitimate tasks unwillingly under the overwhelming physical, emotional or economical influence or dependency on their male partners, eventually however becoming themselves interested on perpetuating the crime. Still, others might consider, out of purely egoistic considerations, the trafficking of other women as an economically plausible way of earning – these female perpetrators would often fail to develop a genuine sense of sympathy towards their victimized subjects due to their own history of hardship.²⁸

2.2.2. Climbing the Ladder

A second typical pathway of women to becoming a sex trafficker is by ‘climbing the ladder’. In fact, a significant number of female perpetrators have been found to be former sex workers or victims of forced sex trafficking, with many having been involved through either relatives or their male partners.²⁹ Fearing being subject to further humiliation and physical abuse, many would gradually move towards the organizational side of trafficking while trying to escape further victimization.³⁰ Victims’ options to exit, besides by coercion can further be restrained by an absence of prospects outside the boundaries of the trafficking business and a lack of social and familial support for reintegration due to their stigmatization, becoming

²⁶ Demir, *supra note* 18, 333; Gilfus, *supra note* 25, 75-76.

²⁷ Marion van San, ‘The appeal of ‘dangerous’ men. On the role of women in organized crime’ (2011) Vol. 14 Is. 4 *TOC* 292.

²⁸ Miriam Wijkman, Catrien Bijleveld, Jan Hendriks, ‘Juvenile female sex offenders: Offender and offence characteristics’ (2014) Vol. 11 No. 1 *EJC* 32; Donna M. Hughes, Tatyana A. Denisova, ‘The transnational political criminal nexus of trafficking in women from Ukraine’ (2001) Vol. 6 Is. 3-4 *TOC* 7; Surtees, *supra note*, 17, 45.

²⁹ Denisova, *supra note* 20, 34; Keo, *supra note* 9, 25; Analysing the Business Model of Trafficking in Human Beings to Better Prevent the Crime (OSCE, UN.GIFT 2010) 43-44.

³⁰ Lo Iacono, *supra note* 4, 116-117.

dependent on the system.³¹ Thus, knowing well the ‘intrigues’ of the business and already being part of a well-explored network, women may start, willingly or unwillingly, filling in the gray areas between traffickers and victims by contributing to the operating of the organization through means explored in the next chapter. In shifting their position in the organizational hierarchy, empathy and emotional concerns are again put aside: having themselves been subjects to abuse and humiliation a ‘better her than me’ approach is adopted as a mode of individual survival strategy. The considerations and attitudes towards the trafficking business may, however, further vary. Some may consider climbing the ladder not only as a mode of survival, but also as a better and more convenient way of making money. Nigerian madams are, for instance, generally well respected, looked-up upon role model figures among their apprentices, representing a Western-associated way of achieving career, success and luxury.³² In these organizations, the most trustworthy and aspirant sex workers are gradually promoted and involved in the running of the trafficking business with the eventual possibility of becoming madams themselves.³³ European organizations display still another role for female participants who often remain having a mid-ranking role in the criminal enterprise, being elevated to the top only in instances where for example their husbands or the male leaders are arrested.³⁴ Generalizations are however difficult to be made with respect to Europe: as it will be soon explained, Eastern-European, particularly Ukrainian, female offenders have yet again a different mode of self-organization in the trafficking business.³⁵

3. The Role of Female Offenders in Sex Trafficking Organization

3.1. Recruitment Process

According to Siegel and de Blank, the role of female offenders in human trafficking, especially for sexual exploitation, is increasing and involves various activities.³⁶ In many cases, women are involved in the recruitment processes of new prostitutes, since they have easier access to other women. Indeed several studies show that women are generally perceived with gender stereotypical characteristics, such as innocence, care givers, sensitivity

³¹ Long, *supra note* 19, 56-57; Lo Iacono, *supra note* 4, 122-123.

³² Siegel, *supra note* 16, 262.

³³ *Ibid* 266; Siegel *supra note* 2, 443-447.

³⁴ *Ibid*, 442.

³⁵ Denisova, *supra note* 20, 34.

³⁶ Siegel, *supra note* 2.

etc.³⁷ Furthermore, regarding sexual trafficking women are usually known as the victims and not the offenders. These perceptions of women created by society also play a role in the victim's trust towards female offenders. Therefore, women are more likely to trust and be seduced by female than male recruiters.

As to the several reasons for women to get involved in the recruiting process, the known cases generally outline that they are either forced by a pimp, an agreement between the female recruiter and the pimp exists, or the women are the direct offender without a male counterpart. Often, the recruiters work simultaneously as prostitutes and try to find new recruits amongst their friends and family. Furthermore, the pimp might convince them to take part in the recruitment by offering them financial or material rewards. In some cases the prostitutes were even released in exchange of the new girls. These released prostitutes should charm the new girls by pretending that their stay in the receiving countries was an amazing experience. This method, named "happy trafficking"³⁸, according to Aronowitz 'reduces the risk for the organizers by putting women in visible positions as recruiters and at the same time increases profits, turning victims into "proxy recruiters" and eventually traffickers.'³⁹ In order to recruit new prostitutes and to convince the future recruits to migrate to the receiving country, the female recruiters use the arguments of a better life, attractive employment, education or marital possibilities. It is also easier for these women to recruit girls from their own countries by creating linguistic and emotional ties. Thus, the conduct of the recruitment process also varies according to the different ethnicities and cultures.

The following chapters will be divided according to the origins of the recruiters and their victims. The most common information on female offenders comes from West Africa, especially Nigeria, the Balkan region and Thailand. These three examples of female traffickers depict opposite profiles and special methods to handle the illegal activities.

3.1.1. Profile of the Offender and Recruitment in Nigeria

Partly, the so-called "madams" in African countries may represent an ideal for young girls. Some Nigerian prostitutes are sent back with wealthy clothes and jewels in order to attract new girls with their outward signs of wealth. Furthermore, family relations are used to

³⁷ R. Murray Thomas, *Recent Theories of Human Development*. (Sage Publications, 2000), 248; Lina A. Ricciardelli, Robert J. 'Desirable and Undesirable Gender Traits in Three Behavioral Domains' (1995) Vol. 33 *Sex Roles* 637–655.

³⁸ Alexis A. Aronowitz, *Human Trafficking, Human Misery- The Global Trade in Human Beings* (Global crime and Justice, 2009) 53; Eugen Tomiuc, 'World: UN, Campaigners Highlight Grim Reality of _Happy Trafficking_.' (Radio Free Europe Radio Liberty 2008) <<http://www.rferl.org/content/article/1079509.html>> accessed on 16/12/14.

³⁹ Aronowitz, *supra note* 38, 53.

recruit girls in villages, allowing the madams to easily create a link of trust and reliance with the girls.⁴⁰ Usually, they promise the girls to find a decent job such as hairdresser or beautician in the receiving (European) country. However, some of the recruits clearly understand that they will work in the field of prostitution. For the parents the propositions of the madams represent a godsend, an income and a chance for their children to get a better future. Also, the family link with the madams convinces the parents to let the girl go.⁴¹ Moreover, in several societies the cultural perception of women makes them less valuable than men and hence, girls might be seen as a burden for the families. The family pressure might amount to the point where these girls see themselves forced to find a well-paid job abroad in order to support the household financially.

3.1.2. Profile of the Offender and Recruitment in Eastern European Countries

An Italian study showed that in Ukraine 60% of the prosecuted offenders in human trafficking cases were female.⁴² The female traffickers in Eastern Europe are usually working independently. According to Jean-Marc Souvira, the director of the French governmental office against human trafficking (OCRTEH), in these countries the profile of a madam is that of a businesswoman; there is usually no family link between the prostitutes and their offenders.⁴³ Traditionally, women were merely partners in crime, but the trend seems to change and more and more female offenders are working independently, for instance in Nigeria.⁴⁴ Also in Russia prostitutes are recognized for having developed specific skills such as negotiation skills, seductive games, and being good businesswomen.⁴⁵ Many examples show that Russia's prostitutes are usually helped and taught by colleagues or former prostitutes. Ukrainian madams are recognized to be educated and to possess fine communication skills, which increase the confidence of their victims during the recruitment.⁴⁶

Regarding the conduct of recruitment in Eastern Europe, most victims know what will be their future job and have an agreement with the madam or pimp. Nevertheless, subsequently the traffickers often take away their identification documents and also the

⁴⁰ Marie Herbert, 'De plus en plus de femmes proxénètes en France' (Le Figaro, July 2010) <<http://www.lefigaro.fr/actualite-france/2010/07/30/01016-20100730ARTFIG00626-de-plus-en-plus-de-femmes-proxenetes-en-france.php>> accessed on 04/12/14.

⁴¹ *Ibid.*

⁴² Siegel, *supra note* 2, 55; see also Denisova, *supra note* 20, 32. However, this statistics must be handled with care, since they might be influenced by irregularities in the prosecution process.

⁴³ Herbert, *supra note* 40.

⁴⁴ Jana Arsovska, Popy Begum, 'From West Africa to the Balkans: exploring women's roles in transnational organized crime' (2014) Vol 17 *TOC* 9.

⁴⁵ Dina Siegel, 'Recent Trends in Women Trafficking and Voluntary Prostitution: Russian-speaking Sex-Workers in the Netherlands' (2005) No. 4 *TC* 18.

⁴⁶ Denisova, *supra note* 20.

working conditions are not the same as promised in advance. Thus, these girls still must be seen as victims.

3.1.3. Profile of the Offender and Recruitment in Thailand

Thailand is regrettably often recognized for its sexual trafficking issues. Sex trafficking, even though forbidden by law, represents an important part of the economy and the country attracts a flow of sexual tourists. Also the families are highly dependent on sex-worker's incomes. More and more Thai women are sold for sexual-trafficking purposes by their entourage.⁴⁷ The 'mama-sans' from Thailand are usually described as partners in crime,⁴⁸ they help their husbands or their family members to recruit the victims, generally from lower-class rural society. Sometimes, they are also part of a bigger network or a mafia. The use of social media and the Internet for prospections of new victims is increasing in Thailand. The women recruit their victims in Thailand, where they know the language and the domestic issues; later part of the Thai victims is sent to other countries such as Japan or Europe.⁴⁹ Abroad the victims are restrained, because of their debts and passport confiscations. The traffickers keep them under control by threatening to take their family properties such as lands.⁵⁰ In order to coerce their victims the mama-sans use violence and threats. The Thai female offenders also manage the girls and keep them under surveillance.

These examples underline that the process of recruitment can take different pathways connected to the culture and social identities of the actors. Also, the new social media and new technologies of information and telecommunication facilitate the prospection of victims.⁵¹ Generally, traffickers use many methods, legal or not, to bring the victims into the receiving country. These methods usually have a high cost and the expenditures will be used to create a tie for the prostitutes, who must work off these debts.

⁴⁷ Dulcey Simpkins, 'Rethinking the Sex Industry: Thailand's Sex Workers, the State, and Changing Cultures of Consumption' (1997-1998) Vol 12 Is. *Unequal Exchange: Gender and Economies of Power, MFS* <<http://quod.lib.umich.edu/cgi/t/text/text-idx?cc=mfsfront;c=mfs;c=mfsfront;idno=ark5583.0012.005;rgn=main;view=text;xc=1;g=mfsg>> accessed on 16/12/14.

⁴⁸ Siegel, *supra note* 2, 442.

⁴⁹ *Ibid*, 443.

⁵⁰ US State Department, 'Trafficking in Person report on Thailand' (Office to monitor and combat trafficking in persons, 2014) <<http://www.state.gov/j/tip/rls/tiprpt/countries/2014/226832.htm>> accessed on 04/12/14.

⁵¹ Danah Boyd et al, 'Human Trafficking and Technology: A framework for understanding the role of technology in the commercial sexual exploitation of children in the U.S.' (2011) 4 <<http://research.microsoft.com/en-us/collaboration/focus/education/htframework-2011.pdf>> accessed on 13/12/14.

3.2. Further Positions of Women in Sex Trafficking Organization

We have seen previously that women are highly involved in the recruitment process. Nevertheless, women can be involved deeper and occupy different positions in the sexual trafficking process. In this part their positions and tasks within the criminal organizations will be set out. In 2009 the United Nations Office on Drugs and Crime (UNODC), reported that women play a significant role in human trafficking⁵² through direct or indirect involvement. Women may be partners in crimes but also are capable of playing a leading role in human trafficking organizations. Thus, women are involved in all stages of the organizations, from the recruitment over the supervision of prostitutes and finances up to the leading positions.

The former or actual prostitutes possess a good knowledge of the business, which facilitates the recruitment and the establishment of control over new prostitutes.⁵³ Also, the nationality, ethnic or religious ties with the victims can increase the bond between them and hence the efficiency in terms of recruitment and control.⁵⁴ The women might be able to exchange in their own language and the victim will receive advice from her offender; they teach and train them about the job.⁵⁵ Often, a relation of confidence and even more a relation of friendship might develop between the victims and their offenders; subsequently the line between offender, adviser and friend gets blurred for the victim.

Furthermore, women can be involved in the presentation of potential prostitutes, in the transportation and migration processes, in the financial aspects of the exploitation, but also as a “straw men” for making administrative steps such as renting houses.⁵⁶ They might be involved in the transportation as people smugglers, manage and handle the prostitutes, guarding them in the brothel, provide counterfeit passports, administrative and identification papers, corrupting police and law enforcement actors.⁵⁷ The women might also rent places used for sexual trafficking such as brothels, hotels, massage areas, bars and nightclubs.⁵⁸

⁵² UNODC, Global Report on Trafficking in Persons 2012 (United Nations publication, Sales No. E.13.IV.1), 33.

⁵³ Jørgen Carling, ‘Migration, Human Smuggling and Trafficking from Nigeria to Europe’ (Report to the International Organization for Migration, 2004) <<http://www.humantrafficking.org/publications/442>> accessed on 09/12/14.

⁵⁴ Margaret Beare, ‘Women and organized crime’ (Research and National Coordination Organized Crime Division Law Enforcement and Policy Branch Public Safety Canada, Report No. 013, 2010) 49, <http://publications.gc.ca/collections/collection_2012/sp-ps/PS4-106-2010-eng.pdf> accessed on 13/12/14.

⁵⁵ Barbara Sherman Heyl, ‘The madams as teacher, the training of house prostitutes’ (1977) Vol. 24 *Social Problems*, < <https://www.d.umn.edu/~bmork/2306/readings/hey1.htm>> accessed on 16/12/14.

⁵⁶ Jana Arsovska, Felia Allum, ‘Women and transnational organized crime’ (2014) Vol. 17 Is. 1 *TOC* 4; see also Siegel, *supra note 2*.

⁵⁷ Beare, *supra note 54*, 50.

⁵⁸ Justyna Sylva ‘Sex Trafficking of Women and Children in Europe and the Commonwealth of Independent States: The Global Politics of Exploitation’ (2013) *Internet Journal of Criminology* 25,

However, they may as well directly manage the business as madams or be the head of the organization.⁵⁹ The female offenders, by means of creating a link with the women they exploit, are able to control them without the intervention of men. This link is usually emotional and based on manipulation.

The Nigerian National Agency for the Prohibition of Traffic in Persons and Other Related Matters reported in 2012 that women are more likely to be suspected than men in trafficking cases in Nigeria. Especially, concerning sexual exploitation, the number of women suspected is higher than the men. Among six cases in 2013, four women were convicted.⁶⁰

3.3. The Specific Methods used by Female Traffickers

The emotional connection of the prostitutes with their offenders is a widespread way to maintain the control over them. In exchange of the opportunities and services from the madams such as transportation to the receiving country, visa costs, counterfeit identification papers and accommodation expenses, the victims find themselves easily in a situation of dependency and indebted to the trafficker.⁶¹ In some cases even when the prostitute has paid back her debt, she stays in the prostitution network and under the control of her oppressor. Several reasons exist to explain this phenomena, one is obviously that the offender will not let the victim go, when it is too beneficial for him or her; another and even more appalling reason is that often the victim stays voluntarily, since it does not see the way out of this way life once in the spiral. For example, Nigerian victims usually are only tied to the madams until they have paid off their debts.⁶² However, after the payback of the debt their life conditions and limited opportunities might make them turn into madams themselves or keep working for their madam voluntarily.⁶³ In contrast, Albanian prostitutes are usually forced to sell their body for a lifetime.⁶⁴ The confiscation of their identification paper and irregularities towards the law constrain them to remain under their offender's control. Also, psychological factors, such as the shame victims might feel, can force them to stay silent about their activities. Another burden for the victim can be the financial dependency of its family. For instance, this

<http://www.internetjournalofcriminology.com/Syla_Sex%20Trafficking_of_Women_and_Children_in_Europe_and_the_Commonwealth_of_Independent_States_IJC_May_2013.pdf> accessed on 16/12/14.

⁵⁹ Siegel, *supra note* 2, 443.

⁶⁰ National Agency for the Prohibition of Traffic in Persons and Other matters, Nigeria (NAPTIP database 2012-2013), <<http://www.naptip.gov.ng/docs/Report%20for%202012%20v1.pdf>> accessed on 04/12/14.

⁶¹ Toine Spapens et al, 'Deliverable D1.3: A report concerning the macro and micro analyses of human trafficking, Trafficking as A Criminal Enterprise' (2014) 7, <http://trace-project.eu/wp-content/uploads/2014/11/TRACE_D1.3_Final.pdf> accessed on 13/12/14.

⁶² Aronowitz, *supra note* 38, 45.

⁶³ Beare, *supra note* 54, 50; Jackie Turner, Liz Kelly, 'Trade Secrets: Intersections between Diasporas and Crime Groups in the Constitution of the Human Trafficking Chain' (2009) Vol. 49 *BJC* 184-201, 8.

⁶⁴ Aronowitz, *supra note* 38, 45.

is usually the case in African countries; the girls have to send back money to their family, which directly obliges them to work hard to be able to raise this financial support.

In order to control their victims, offenders often use violent means and threats. Typically, female offenders are less willing to use violence than men. On one hand, because of their physical abilities compared to men and on the other hand, because of their psychological/socio-cultural profile. Nevertheless, some female offenders are also considered to be even more violent in their actions than men.⁶⁵ Therefore, women tend to adopt the same profile and methods as male pimps to frighten, discipline or reprimand the victim. In many cases, they also threaten or use their relationship with the victim's family to retain the victim under control. In Nigerian cases, the use of voodoo spells is frequently reported in order to bind the victim to the 'employment contract'.⁶⁶ These spells would, for instance, lead to the misfortune of them or their families. Thus, the use of cultural beliefs is a really successful mean to control the victims without effort.⁶⁷

Inside of the brothel the girls often are in a state of competition to each other and the madams might use this fact in various ways to keep them under control, for instance manipulating them by playing with compliments, jealousy and rivalry.⁶⁸ The relationship between the victim and the madam can create mixed emotions for the victim, who finds itself between actions of affection and violence. These complicated relations between victims and offenders might even generate Stockholm syndromes; nevertheless, these cases are more often reported when the offender is a male.⁶⁹ The transportation and the migration of the victims in a foreign country increase the linkage and relationship with their (female) offender, even more so when they speak the same language and have the same origin. The discovery of the unknown country will foster the dependency of the girls in terms of language and administrative steps.⁷⁰ Furthermore, the arriving girls often lose direct contact with their families and find themselves alone in an unknown social and economic environment. These factors clearly increase the dependency on their pimps and vice versa increase the control of the pimp on the new recruits. In many countries a link exists between the nationality of the offenders and the nationality of the victims. Nevertheless, the victims are not only exploited by their compatriots.

⁶⁵ Beare, *supra note* 54, 51.

⁶⁶ Aronowitz, *supra note* 38, 60.

⁶⁷ Carling, *supra note* 53.

⁶⁸ Sylva, *supra note* 58, 27.

⁶⁹ Michael Bradley, 'Human trafficking: Why do so many victims refuse help?' (BBC News England, October 2013) <<http://www.bbc.com/news/uk-england-24548143>> accessed on 04/12/14.

⁷⁰ Sylva, *supra note* 58, 26.

In conclusion, it is obvious that women are involved differently in the process of human trafficking for sexual purposes. Furthermore, not only one specific profile of female offenders exists, but the profiles are diverse. However, similarities can be established in terms of general behavior, recruitment and suppression methods especially according to the nationality or cultural and social background.

4. The Prosecution of Female Offenders

Another factor influencing the statistics on the involvement of female offenders in trafficking of persons is the likelihood of the prosecution of women. On the one hand, certain aspects exist, which enhance the probability for women to be charged and prosecuted. For instance, they are usually deployed in low ranks of the trafficking organization as explained above. On the other hand, aspects can be found that reduce this probability, such as victimization or female stereotypes by prosecution bodies. In the following chapters some of the most important aspects therefore will be highlighted.

4.1. Challenges in the Prosecution of Female Traffickers

4.1.1. Unwillingness of Victims to Testify

Generally in human trafficking cases, victims tend to be unwilling to speak up against their traffickers. Sometimes the victim cooperates with the police in the first instance, but revokes its testimony later.⁷¹ Various reasons therefore can be found:

The first reason is as set out above the intimate relationship that has evolved between the victim and its trafficker, be it an emotional investment or professional cooperation.⁷² In this context it is often mentioned, that the trafficked women undergo intimate relationships with their male traffickers (and pimps). However, the victims of human trafficking for sexual purposes are not only often recruited into the “job” by women, but also subsequently oppressed by women. For instance, the ‘mama-sans’ in Thailand and Taiwan are usually the ones conducting the daily contact with the victims.⁷³ Also the Nigerian ‘Madams’ show that the primary contact in the organization is many times between women only and thus these

⁷¹ Heather Clawson et al, *Prosecuting human trafficking cases: Lessons learned and promising practices* (2008 Washington DC: ICF International) as cited in William Adams et al, ‘Identifying Challenges to Improve the Investigation and Prosecution of State and Local Human Trafficking Cases’ (Report to the National Institute of Justice, April 2012) 15, <<https://www.ncjrs.gov/pdffiles1/nij/grants/238795.pdf>> accessed on 09/12/14.

⁷² Adams, *supra* note 71, 84.

⁷³ Siegel, *supra* note 2, 443

victims can develop very strong bonds to their female suppressors as well.⁷⁴ The typical characteristics of the ambivalent relationship⁷⁵ victims have to their traffickers are ‘close, controlling and dependent’.⁷⁶ They are afraid of losing their only financial and emotional support network,⁷⁷ since in many cases their traffickers and other victims exclusively form their social environment⁷⁸ and the victims usually suffer a general loss of freedom.⁷⁹ Furthermore, in human trafficking cases a high probability of victim intimidation exists.⁸⁰ Often, the victims are not only threatened themselves, but also have to fear for their family in the country of origin, since the organization is rooted there as well.⁸¹

Moreover, victims of sex trafficking often are afraid to be charged with crimes themselves, since in many countries prostitution still remains illegal, and are therefore reluctant to come forward to the police.⁸² Also, many victims know that their residence in the country is illegal and thus fear charges and deportation⁸³ or that the human trafficking process might have negative affects on their pending asylum process.⁸⁴ Thus, a general reluctance to support criminal proceedings can be noted. In many cases, the victim simply does not wish to proceed, which is understandable regarding the trauma suffered and the difficulties to face in connection with the prosecution. Also, a general distrust in law enforcement agencies, out of bad experiences is likely.⁸⁵ Often, the victims simply run off after they are freed and go underground.⁸⁶

The phenomenon of victims’ unwillingness to testify is unfortunately an international one and not limited to human trafficking cases. The law enforcement agencies meet this unreliability of witnesses and thus the most important source of evidence by searching other, more reliable sources. For instance, when the English-Welsh Crown Prosecution Service (CPS) believes that a witness might be vulnerable or intimidated, they conduct further

⁷⁴ See Figure 1 in Marina Mancuso, ‘Not All Madams Have a Central Role: Analysis of a Nigerian Sex Trafficking Network’ (2014) Vol. 17 *TOC* 73.

⁷⁵ See Carling, *supra* note 53, 49 for the relationship between Nigerian Madams and their victims.

⁷⁶ Crown Prosecution Service (CPS), ‘Policy for Prosecuting Cases of Human Trafficking’ (2011) 14, <<http://www.cps.gov.uk/publications/prosecution/>> accessed on 09/12/14.

⁷⁷ Adams, *supra* note 71, 85.

⁷⁸ See e.g. Figure 4 in Carling, *supra* note 53, 27.

⁷⁹ CPS, *supra* note 76, 17.

⁸⁰ *Ibid*, 14.

⁸¹ *Ibid*, 17; see further Carling, *supra* note 53, 48 for the various reasons victims have to stay in their state of oppression.

⁸² Adams, *supra* note 71, 82

⁸³ *Ibid*.

⁸⁴ CPS, *supra* note 76, 17.

⁸⁵ *Ibid*.

⁸⁶ Interview with Judge Ulrich Nachtlberger, Regional Court Judge, Vienna Regional Court for Criminal Matters (Vienna, Austria, 19 August 2014).

investigations, which might show harassment or witness intimidation.⁸⁷ The Austrian special forces for human trafficking are aiming to replace witness testimonies by means of accumulation of *prima facie* evidence.⁸⁸

Furthermore, witness protection and specialist support are naturally essential to establish a sense of security for the victims.⁸⁹ It is also important that the victims do not have to fear prosecution, e.g. in countries where prostitution still remains illegal, or negative effects on their asylum process.⁹⁰ Generally, the recognition of diversity of victims by law enforcement agencies and prosecutors is highly important: Experiences differ and factors like ‘the victim’s ethnicity, age, immigration status, religion and culture, the safety and needs of each victim must be assessed on an individual basis.’⁹¹

4.1.2. Victims as Perpetrators

The fact that many female offenders in trafficking of persons are also former victims of sexual exploitation creates a great challenge for the prosecution.⁹² Although they have “worked their way up” in the organizational ranks, they still might be oppressed and exploited by other members in the organization, since they usually stay in low ranks.⁹³ These women are themselves under pressure and fear, and believe not to have a choice in their actions, since they have to face consequences for their misconduct by the organization. For instance, it has been researched in Nigerian cases that victims, who are near to the end of their debt, start to create their own business as a madam, while still working for their own madam.⁹⁴ But also in other (male centered) organizations, some of the victims are used to supervise and manage other victims. For instance, in the United States so-called “bottom-bitches” exist – women used by the pimp as his right hand to control the other prostitutes. They also serve as managers on lower levels, e.g. to set up dates, make reservations, hold credit cards etc. to protect the pimp from detection.⁹⁵

However, this creates a very fine line between being a victim and being a perpetrator. Generally, victims should not be punished for crimes committed during their oppression by

⁸⁷ CPS, *supra note* 76, 14.

⁸⁸ Interview with Oberst Gerald Tatzgern, Head of the Unit for Trafficking in Human Beings and Prostitution, Criminal Intelligence Service Austria (Vienna, Austria, 31 July 2014).

⁸⁹ CPS, *supra note* 76, 14.

⁹⁰ E.g. *National Referral Mechanism* by the CPS in England and Wales, gives victims a 45 day recovery and reflection period and temporary one-year renewable residence permit, when they assist in the criminal proceedings. See CPS, *supra note* 76, 17.

⁹¹ *Ibid.*

⁹² See e.g. Adams, *supra note* 71, 57.

⁹³ UNODC, *supra note* 52, 31.

⁹⁴ Mancuso, *supra note* 74, 72.

⁹⁵ Adams, *supra note* 71, 197.

traffickers; not only because they might have been forced to commit these crimes, but also for the sake of truthful witness testimonies and thus a successful prosecution in the public interest. Nevertheless, not every brutal behavior of “victim-perpetrators” can be excused and that a person is a victim in one aspect does not conclude that the same person cannot simultaneously be the perpetrator in another aspect. Thus, using the terms of the Austrian legal system, it might be an exculpation but not a justification. However, these aspects are extremely difficult to prove, if not often impossible, since it is a matter of inner motives, whether a crime was committed voluntarily, involuntarily or also involuntarily in the beginning but later voluntarily. These circumstances give female offenders the possibility to slide under the radar by selling themselves as victims.⁹⁶ For instance, during a razzia in Thailand of a building where victims of sex slavery were known to be held, about 20 prostitutes were found. Later in the investigation it turned out that one woman, who while being held permanently insisted to make a phone call claiming that she needed to nurse her baby, was in fact one of the responsible members of the human trafficking organization.⁹⁷

However, it can also be a tool of the prosecution to offer victims amnesty for the crimes committed during their time in the organization in order to get the heads of the organizations, not victims who were pushed into criminality by their suppressors.⁹⁸ This imposes the difficulty of finding a balance between the principle of non-punishment for victims and the principle of non-impunity for traffickers on the prosecuting bodies.⁹⁹

4.1.3. Female Stereotyping during Prosecution

Furthermore, women are still perceived as passive bystanders or unknowing partners, unequipped with the qualities necessary for criminal activities in many countries around the world and by many individuals in the prosecution bodies. The judgment of the victim’s or perpetrator’s credibility by police and prosecutors influences the decisions whether to press

⁹⁶ Sharon Buchbinder, ‘When Women Traffic other Women’ (The Daily Beast, 8.7.2013) <<http://www.thedailybeast.com/witw/articles/2013/08/07/when-women-are-found-trafficking-other-women.html>> accessed on 28/10/14.

⁹⁷ Discovery Documentary HD Channel (Official), ‘21st Century Sex Slaves Documentary, Human Trafficking’ <<https://www.youtube.com/watch?v=ajbQVwbWRg0>> accessed on 04/12/14.

⁹⁸ Maria Grazia Giammarinaro in OSCE, ‘Combating Trafficking and Exploitation: Human Rights, Social Justice and the Rule of Law’ (2013 Annual Report of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings), SEC.GAL/195/13 29 November 2013, 3, <www.osce.org/secretariat/109731?download=true> accessed on 09/12/14.

⁹⁹ UN. GIFT, ‘016 Workshop: Profiling the Traffickers’ (The Vienna Forum to fight Human Trafficking 13-15 February 2008, Austria Center Vienna, Background Paper) 6, <<http://www.unodc.org/documents/human-trafficking/2008/BP016ProfilingtheTraffickers.pdf>> accessed on 10/10/14.

charges and to prosecute or not. However, these judgments are often affected by gender stereotypes.¹⁰⁰

A study conducted by the UNODC between 2007 and 2010 has shown regional patterns in the proportions of men and women prosecuted and convicted of trafficking in persons. For instance, in Eastern Europe and Central Asia the numbers of female offenders seem to be surprisingly high. However, prosecuted women in Eastern Europe and Central Asia are more likely to be convicted than men, whereas prosecuted women in the Americas are less likely to be convicted than men.¹⁰¹ As Ramón Rivera states the situation regarding so-called ‘Coyotes’ and cross-border smuggling in the US: ‘These women inspire confidence in the immigrants and when the authorities stop them and take them to court, they give them shorter sentences because they are mothers, daughters, because they are women. But when they get out, they go right back to doing the same thing, or worse – they start going into other areas.’¹⁰² A study conducted in the US showed that female suspects are 16% less likely to be arrested for human trafficking, 16% less likely to be prosecuted, but 11% more likely to be found guilty.¹⁰³

Even the decision if a person is regarded as a suspect, is often affected by irrelevant facts, like the gender of the person and so are other decisions in the whole proceedings. Since police officers, prosecutors and judges rely to a large part on their personal experience while making decisions, they naturally also rely on stereotypes for the assessment of a person’s credibility and trustworthiness.¹⁰⁴ These stereotypes vary, depending on the country, culture and individual.

5. Conclusions

Conclusively, involvement in sex trafficking for most implicated actors often remains their sole opportunity for improving their precarious economic position. Sex trafficking can thus be considered as merely the tip of the iceberg, an expression of pervasive social inequalities and of the lack of female empowerment. Therefore, besides considering the

¹⁰⁰ Adams, *supra note* 71, 15.

¹⁰¹ UNODC, *supra note* 52, 31; According to the UNODC women in Eastern Europe and Central Asia account only for 63% of the total number of prosecutions, but for 77% of convictions. In the Americas women account for 50% of the prosecutions but only 42% of convictions.

¹⁰² Ramón Rivera as cited in Núñez, Claudia, ‘Women Are the New Coyotes’ (New America Media, 23. December 2007)

<http://news.newamericamedia.org/news/view_article.html?article_id=170fbf6eecdd019ad7e93f66eda8d6b8> accessed on 09/12/14.

¹⁰³ Adams, *supra note* 71, 66.

¹⁰⁴ *Ibid*, 15.

‘darker’, criminal aspects of the issue, more emphasis should be put on understanding the underlying societal pressures that motivate, coerce or force women to becoming victims or traffickers. In doing so, a distinguished attention should be put on the greater involvement of non-governmental organizations (NGOs) whose pivotal role in tackling sex trafficking must not be impeded by their, albeit well-intentioned, but often contextually shallow or ideologically biased understanding the phenomena.

Furthermore, the importance of women's participation in sexual trafficking is noticeable in various states. The several examples underline that it's imperative to understand the multi-dimensional profile of women involved in sex trafficking. Their presence is perceivable from the recruitment to the exploitation of the victims. Culture plays a substantial part in the recruitment methods, in the relation between the victim and the offender, but also in the coercion of victims. However, similarities are observable in the methods employed by the women offenders. The comprehension of these methods, of the cultural ties, as well as of the profile of the women involved in sex trafficking are fundamental in order to approach the victims and to detect the potential networks.

Naturally, the strengthening of the rule of law is essential in the area of human trafficking. As long as the costs and risks for perpetrators stay low, the business remains tempting for potential perpetrators. Thus, the support of victims must be increased, not only from a humanitarian aspect, but also because victims form the most important source of evidence, who might decide entirely over the outcome of a case and therewith, if a perpetrator will pay for his crimes or not. This directly influences the successful establishment of the rule of law. Once victims are willing to leave their organization, it is essential that they find appropriate support in all important fields: general information, residence permits, protection, financial and psychological support etc. Also the organs of prosecution bodies have a decisive role to play. Police officers, prosecutors, judges, expert witnesses, social workers – simply every link in the chain must be well aware of the existing issues in order to avoid stereotypical thinking and wrong judgments and ensure appropriate handling of victims and “victim-perpetrators”.

What the UN can do? The UN and its agencies should keep raising awareness on the issue, including further investigation and evaluation of statistical data, since not much empirical research exists on the matter. More concrete results on the issue will facilitate to prove the existence of an issue and subsequently the education of state actors on it.

What States can do? States should amend their criminal justice systems with legislation in other areas, such as labor, civil and administrative law.¹⁰⁵ Of course States should make sure to pass down the information provided in all ranks of law enforcement to establish an informed decision process. Also national legislators need to be aware of the existing problems in order to address the issue of a right balance of the principles of non-punishment of victims and non-impunity of traffickers. Furthermore, compensation claims should be awarded to the victims of human trafficking as an incentive to come forward and to enable women to leave the organizations.¹⁰⁶ The establishment of rehabilitative programs for female offenders in prison would be necessary in order to reintegrate these women in society and to provide them with an alternate living model.¹⁰⁷

What NGOs can do? Being aware of the victim-perpetrator issue and support victims in every way the can, including providing secure and anonymous information for instance through hotlines. Naturally, awareness raising always depends to a large part on NGOs, however as mentioned above not only “that” but also “how” matters here.

¹⁰⁵ Giammarinaro, *supra note* 98, 3.

¹⁰⁶ *Ibid.*

¹⁰⁷ JR Chapman, *Economic realities and the female offender* (Lexington Books, Lexington 1980) as cited in Annette Hübschle, ‘Of bogus hunters, queenpins and mules: the varied roles of women in transnational organized crime in Southern Africa’ (2014) Vol. 17 *TOC* 34.

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