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DANISH IMMIGRATION SERVICE



Cooperation with the National Agency for the Prohibition of Traffic in Persons and other related matters (NAPTIP)

Report from Danish Immigration Service's fact-finding mission to Abuja, Nigeria

14 to 24 February 2009

Copenhagen, April 2009

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Overview of fact-finding reports published in 2008 and 2009

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Protection of victims of trafficking in **Ghana**, Report from Danish Immigration Service's fact-finding mission to Accra, Ghana. February 25 to March 6 2008
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Recruitment of IT specialists from **India**, An investigation of the market, experiences of Danish companies, the attitude of the Indian authorities towards overseas recruitment along with the practices of other countries in this field. Report from the fact finding mission to New Delhi and Bangalore, India
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Introduction to the fact finding mission and the report

Danish Non-Governmental Organisations (NGOs) engaged in assistance to victims of trafficking in Denmark have alleged that the Nigerian National Agency for the Prohibition of Traffic in Persons and other related matters (NAPTIP) is corrupted and involved in human trafficking as well as collaborating with criminal groups in European countries. In addition to this an anonymous source has claimed that the agency is undertaking such a level of international travel activities that its capacity to assist victims of trafficking in Nigeria is accordingly being reduced.

On the basis of the above mentioned allegations, and the fact that DIS' most recent information on the performance of NAPTIP was gathered in September 2007¹ the DIS decided to undertake a fact finding mission to Nigeria. The purpose of the mission was to gather updated and additional information on the performance of NAPTIP and additional information on the agency's cooperation with Western countries and embassies, the International Organisation for Migration (IOM), the United Nations (UN) and local NGOs. The mission was undertaken from February 14 to 24 2009.

In Nigeria the delegation consulted a number of Western embassies engaged in cooperation with NAPTIP, International Organisation for Migration (IOM), UN agencies and other anti-trafficking organisations in Nigeria as well as NGOs and, at the very end of the mission, NAPTIP. The sources consulted have an in-depth knowledge of NAPTIP's activities and performance, as almost all of them are directly or indirectly cooperating with NAPTIP or acquainted with NAPTIP and its efforts to combat trafficking in humans. A list of sources consulted is attached to the report.

It should be noted that no source consulted during the mission had information that NAPTIP's performance had deteriorated since the DIS undertook its mission to Nigeria in September 2007. On the contrary most sources stated that NAPTIP's performance had actually improved during the last couple of years.

Because of the delicate matter of the accusations against NAPTIP all Western embassies chose to be referred to as "a Western embassy". The same conditions applied for the UN organisations as well as some NGOs. All interlocutors agreed that their statements could be included in the report at hand. The complete identity of all sources consulted during the mission is known to the DIS.

The sources consulted were informed that the report at hand would be a public document and have had their statements presented in writing for approval before being included into the report. No other comments or statements have been included in the report except when a specific reference is made to relevant public reports and articles.

During the delegation's stay in Nigeria the Nigerian Government announced that it had accepted the resignation of the Executive Secretary of NAPTIP. The resignation took place on February 20 2009, and it came as surprise to all observers, including the leadership of NAPTIP. As a consequence of this sudden resignation the delegation decided to extend its stay in Nigeria for a few days in order to

¹ Danish Immigration Service: *Protection of victims of trafficking in Nigeria, Report from Danish Immigration Service's fact-finding mission to Lagos, Benin City and Abuja, Nigeria, 9 to 26 September 2007*, Copenhagen, April 2008.

obtain further information on the reason behind the resignation. All additional information regarding the resignation is included in this report.

The DIS wishes to express its gratitude towards the embassies/institutions/organisations and persons in Nigeria that made the tasks of this fact finding mission possible. Without the preparedness, support and open-mindedness from all sources consulted it would not have been possible for the DIS to be informed and updated on the performance of NAPTIP.

The report at hand has been written by Jens Weise Olesen, Chief Adviser, Documentation and Project Division, DIS. This report is a public document.

1. Western countries' cooperation with NAPTIP

When informed about the purpose of the Danish Immigration Service's visit to Abuja, a Western embassy (A) explained that its national migration service visited NAPTIP in 2007. It was then agreed that the Government of embassy (A) would support NAPTIP to undertake a project in any specific area of NAPTIP work.

Following this visit NAPTIP forwarded a project proposal to the government in question regarding assistance in the rehabilitation and reintegration of 27 victims of trafficking that were found in a containerized truck in Enugu State. Through investigations it was found that the destination for these victims of trafficking was a State in south-western Nigeria. NAPTIP released the victims and assisted them with medical care, food and clothing in NAPTIP's shelter in Enugu. They were later returned to their community in Cross Rivers State. NAPTIP stated that in order to prevent the victims of being re-trafficked there was a need to rehabilitate and re-integrate them into society through the provision of training and working tools with which they could start small business to earn a living.

In April 2008 the above mentioned country and NAPTIP signed an agreement concerning the rehabilitation and reintegration of these 27 victims of trafficking and a public awareness, sensitization programme. The agreement covers the period of a year. According to the agreement the migration service of the country in question should provide NAPTIP with adequate funding. NAPTIP would use the funds put at its disposal only for the activities described in the project. It was added that the funding of the project was taking place directly between the migration service of the country in question and NAPTIP.

The Western embassy (A) emphasized that the project so far had been carried out successfully by NAPTIP and that the migration service of the country in question had been fully content with the direct cooperation. This direct cooperation between the two partners should be seen as an expression of the Western embassy (A)'s and its country's confidence in NAPTIP.

The Western embassy (A) added that it was interested in further cooperation with NAPTIP in the field of investigation. In addition, the government of the Western embassy (A) is funding a United Nations Office on Drugs and Crime (UNODC) project on Capacity Building for NAPTIP's Implementation of the Action Plan against Human Trafficking. UNODC is the executing agency and NAPTIP the implementing agency. The project has a duration of three years (2008-2010).

The Western embassy (A) also supported a project regarding the publication and translation into Igbo language of the simplified anti-trafficking law through a local NGO.

The Western embassy (A) stated that its government's cooperation with NAPTIP had been excellent so far, even though it started recently.

On the recommendation of a Western embassy (C) Reed Slack, who previously served as Chief of Party for the American Bar Association's (ABA's) Rule of Law Initiative, was also consulted. The Western embassy (C) considered Reed Slack to be by far the best resource for on the ground information regarding reliable perspectives on the Danish delegation's questions.

Reed Slack explained that he had been working with NAPTIP for three years. Regarding possible cooperation with NAPTIP or Nigerian NGOs Reed Slack categorically rejected the view that

foreign countries and their embassies in Nigeria should only cooperate with NGOs. First of all it is only the Government that has law enforcement agencies such as NAPTIP and the Nigerian Immigration Service. Secondly Nigerian NGOs have far less resources in manpower as well as financial resources than NAPTIP. The NGOs do not have the protection capacity, equipment and shelter facilities as have NAPTIP. NGOs are good at caring for the victims but they cannot protect them to the same degree as NAPTIP. Reed Slack considered that to bypass NAPTIP would be very wrong and unfortunate. He added that NGOs are in constant search for funding and he did not believe that NGOs – whether foreign or Nigerian – are more reliable or competent than Government agencies such as NAPTIP.

Reed Slack also mentioned the Witness Protection Programme that has been supported by ABA's Rule of Law Initiative. The programme is still in its early stage, but witness protection takes place and Reed Slack was very confident that NAPTIP will protect a witness' identity and protect her in general and as long as is needed.

Reed Slack explained that his NGO had assisted NAPTIP to develop a Trafficking in Persons (TIP) database for law enforcement agencies. The database is secured and access to the database is limited. Any foreign country can safely exchange information related to personal data and specific trafficking cases with NAPTIP.

A Western embassy (B) emphasized that addressing the issue of trafficking in Nigeria implies that foreign countries cooperate with governmental agencies such as NAPTIP as well as with local NGOs. The embassy explained that when it comes to responsibility and sustainability it is important to cooperate with the Nigerian authorities. The combat against trafficking is the responsibility of the authorities.

A Western embassy (B) explained that its indirect financial support to NAPTIP via IOM is based on the needs to strengthen NAPTIP in order to make the agency perform better. It was added that given the level of corruption in the public sector in Nigeria in general the embassy has decided not provide direct financial support to NAPTIP.

A Western embassy (E) explained that in January 2007 the Director of its national anti-trafficking agency visited Nigeria. As a result of the subsequent cooperation between NAPTIP and the police of the embassy's home country it became possible to arrest 11 traffickers in the home country of the Western embassy (E).

The Government of a Western embassy (E) supported NAPTIP's shelters by 50,000 Euros in 2008, and in 2006 it funded a NAPTIP rehabilitation programme on small scale business and vocational training of victims of trafficking and their parents (30, 000 Euros).

A police liaison officer of a Western embassy (D) explained that his embassy cooperates closely with NAPTIP on topics such as training of its staff and investigation. Training of NAPTIP staffs are taking place in the home country of the embassy as well as in Nigeria. The training programme has been ongoing since 2006 and it has been a significant success. The embassy of the liaison officer cooperates directly with NAPTIP and recently the National Prosecutor of the home country of the embassy visited NAPTIP regarding trafficking in persons. It was added that because of NAPTIP's achievements everyone wants to cooperate with it and this puts increasing pressure in its resources.

The police liaison officer of a Western embassy (D) added that there are numerous Western embassies in Nigeria that are cooperating effectively with NAPTIP. It was emphasized that the embassy of the liaison officer has full confidence in NAPTIP and considers NAPTIP to be a very reliable partner. The liaison officer also noted that during the last two years NAPTIP has undergone positive developments. Its leadership is highly responsible, cooperative, reliable, and NAPTIP itself is transparent and an agency to rely on.

2. Efforts to combat trafficking from Nigeria and IOMs cooperation with NAPTIP

IOM explained that NAPTIP is a government agency that receives its funds from the Government budget.

Between the years 2000 – 2007 Nigeria developed a holistic counter trafficking response, with a new legal and administrative framework to prevent and prosecute TIP and protect victims of this crime. With the establishment of NAPTIP in 2003 law enforcement and the judiciary invested in developing an integrated and focused cooperation (joint investigation, and concentration of judiciary jurisdiction in the High Courts). The registration of victims through NAPTIP (since inception NAPTIP rescued and processed approximately 1,500 victim's: women and children, girls and boys) made it possible to develop a better understanding on the dynamics of trafficking in the different states. The number of rescued victims continues to increase every day, thanks to the work of NAPTIP.

Records available to IOM demonstrate that the majority of victims assisted through the Lagos shelter are rescued by NAPTIP, the Nigeria Immigration Service (NIS) and the Nigeria Police Force (NPF). Nigerian Embassies abroad is also active in the identification and rescue of victims, such as the Nigerian Embassy in Moscow. Rescue is not an occasional event but the result of ongoing operations. The number of rescued trafficked persons referred to the Lagos Shelter is important, and admissions are almost on a daily basis since December 1st 2004.

Evidence suggests that a growing number of states are affected by the problem as source, transit, destination states, or a mixture of these three components. Prevalent source areas in Nigeria are the following States: Edo, Abia, Akwa Ibom, Ebony, Imo, Enugu, Cross Rivers. The following states are the most common transit areas: Niger, Lagos, Borno, Sokoto, Cross Rivers. The known internal destinations are the states of Lagos, Katsina, Ogun, and Kano. However a study recently published by NAPTIP suggests that urban settings in the following states are destination areas of internal trafficking from rural areas: Lagos, the Federal Capital Territory (Abuja), Anambra, Kano, Kaduna, Ondo, Oyo, Ogun, Rivers, Enugu and Osun.²

IOM added that Edo State is a source area for international trafficking, and the endemic local government areas are already known: Oredo, Ikpoba-okha, Ovia North East, Uhunmwonde, Egor, Orhionmwon, Esan North East, Esan Central, Etsako West, Ovia South West.

Referring to NIS and NAPTIP IOM explained that the most common external destination countries for trafficking in persons from Nigeria are: Italy, United Kingdom, France, Belgium, The Netherlands, the Republic of Benin, Sierra Leone, Cameroon, Gabon, Niger, Guinea, Togo, Ghana, and Saudi Arabia.

Integrated approaches in the area of social protection and prevention started taking shape as a growing number of victims were rescued, processed through NAPTIP shelters, and returned to the states of origin (IOM Nigeria counted thirty two States of return). To rationalize service delivery NAPTIP coordinated the development of a "National Policy on the Protection and Assistance of

² *The dynamics and contexts of trafficking in persons: a national perspective*, NAPTIP, 2007-2008).

Trafficked Persons in Nigeria” and evaluated positively the benefits of referring victim assistance to NGOs.

The referral mechanism – between NAPTIP and NGOs and between NGOs and NGOs - at this stage is affected by a technical functional discontinuity and the various protection and reintegration activities in the various States are not integrated. In other terms these are fragmented and do not produce an integrated volume of comparable and complementary responses. Capacity building efforts also remain dispersed, especially in the NGO sector and do not reach critical mass for sustainability.

Substantial efforts are ongoing to further assist the strengthening of the protection and assistance system in Nigeria. IOM, for instance, in coordination with NAPTIP, is implementing the pilot project *Counter Trafficking Initiative: analysis of the evolution of trafficking in persons, grass root social intervention, building social services and networking capacity and promoting direct Assistance*. This USD 3.7 million twenty four month project, will support enhanced coordination between NAPTIP, NGOs, and poverty reduction resources in Lagos and Edo States as well as build the capacity to mobilize resources for the replenishment of the Victims of Trafficking Trust Fund through financial investigation. The Counter Trafficking Initiative is finance by the Italian Cooperation, the Dutch Embassy in Nigeria and the Norwegian Embassy in Nigeria.

Despite these efforts it is clear that human trafficking is perpetrated by individuals and organized criminal rings. These would naturally tend to secure their national and international operations and interests through various means that could include infiltration, corruption, and various forms of violence. In general it is safe to state that government agencies and NGOs are vulnerable to infiltration by organized crime and manipulation through various means.

According to IOM a reputable assessment on the situation in Edo State, states that human trafficking eats into the socio-political and economic construct of society. Generally the population feels helpless about the problem. This accounts for the challenges faced by the federal government in combating the menace of human trafficking in Edo State. Reputable sources noted that it is important to support good governance in Edo State, and the hope is expressed that the new administration in Edo State will make some breakthroughs and fight back traffickers. A reputable source noted that the greatest “contribution” of Edo State to the international community is trafficking in persons. But this can change if local actors are properly supported to change the current social perception that traffickers are in fact benefactors, while the reality is that promises are never maintained and their offers are a 419 (fraudulent).

IOM concluded that NAPTIP has a key role in fighting trafficking in persons and protecting the victims. Their work attracts some resistance at various levels, and this resistance will be certainly defeated in the years to come. To achieve this it is important to build partnerships, exchange information, and build bridges instead of walls. This path of dialogue, such as the cooperation between NAPTIP and the Netherlands, can have good results.

3. Comments on allegations that NAPTIP is involved in corruption, trafficking or other criminal activities

A UN organisation (B) rejected unfounded allegations that NAPTIP as an organisation is corrupted, involved in human trafficking and is cooperating with criminal groups in Europe. On the other hand it can never be 100 % excluded that individual Governmental employees in Nigeria as well as in all other countries could be involved in corruption and criminal activities such as trafficking.

It was emphasized by the UN organisation (B) that allegations against governmental agencies in Nigeria are to be taken with great caution. Governmental agencies are sometimes being abused by individuals through wrong allegations. It happens that someone is accusing employees at governmental agencies or within the Government itself without any evidence. Sometimes this happens out of pure ignorance, and some NGOs are lacking knowledge about the Government and its agencies.

The UN organisation (B) stated that it can never fully exclude that employees of NAPTIP could be involved in irregular activities, corruption or even human trafficking. However, statements and accusations that NAPTIP as an agency is involved in such activities should not be taken seriously if no evidence is presented.

When informed that Danish NGOs do not have any presence in Nigeria, the UN organisation (B) suggested that it would be important for Danish NGOs to collaborate with Nigerian NGOs as well as with NAPTIP in the area of anti-trafficking and support to victims of trafficking. NAPTIP is working quite extensively with Nigerian NGOs and foreign NGOs should too be aware of this fact.

The UN organisation (B) added that Western embassies and other UN organisations would be an additional source of information regarding NAPTIP's performance.

IOM stated that with regard to the issue concerning the allegations that NAPTIP is corrupted and colluded with organized crime in Nigeria and abroad, IOM had no information on any ongoing internal investigation over corrupted or criminal practice. IOM commented that any information regarding this concern should be shared with NAPTIP, to facilitate any investigation if necessary. With regard to the treatment of trafficked persons, NAPTIP invested and is investing in the infrastructure and coordination required to implement the law. The Nigerian law is consistent with the Palermo Protocol.

IOM noted that the NGO sector and other partners abroad might have limited information on the efforts done by [the Nigerian] government to counteract human trafficking and the challenges connected to protection and assistance. This might account for some of the concerns [allegations that NAPTIP is corrupted and colluded with organized crime in Nigeria and abroad] raised.

A Western embassy (A) confirmed not having any information on allegations that NAPTIP could be considered as being corrupted or even involved in any criminal activities, including trafficking or cooperation with Nigerian mafia-like groups or criminal individuals abroad or in Nigeria.

It was emphasized by the Western embassy (A) that the migration service of the country in question and the embassy itself consider NAPTIP as a reliable and transparent partner. NAPTIP's

management, including its Executive Secretary are responsible and reliable. The embassy has no information of them being involved in any illegal activities. The bi-annual Stakeholder's Forum is a further instrument to coordinate the cooperation between NAPTIP and its partners. More than 80 individuals participated in the 13. Stakeholder's Forum which took place in October 2008 in Abuja. The participants were representatives of NAPTIP and other Nigerian governmental bodies, Western embassies, NGOs, UN organisations, IOM, independent newspapers, TV and radio stations. At the Stakeholder's Forum meetings every aspect of NAPTIP's activities are being reviewed and discussed in detail.

When asked whether any suspicion regarding the trustworthiness of NAPTIP would be reported by the Nigerian press or any Nigerian NGO, the Western embassy (A) emphasized that this would most probably be the case. No such news about irregularities within NAPTIP have so far been published.

When informed about allegations that NAPTIP is involved in human trafficking and is cooperating with criminal groups in Europe a Western embassy (C) explained that NAPTIP is considered to be the most reliable and transparent law enforcement agency in Nigeria. The embassy referred to the above mentioned Stakeholder's Forum in which any participant can express freely his or her opinion on NAPTIP's performance, and issues of concern are being discussed openly in this forum. Representatives of the embassy had so far participated in five Stakeholder's meetings and had never heard of any concerns as regards the above mentioned allegations.

The Western embassy (C) added that one can of course never exclude that staff members of NAPTIP could be corrupted as corruption is endemic in Nigeria. The previous [i.e. the leadership before the retirement of the former Executive Secretary on February 20, 2009] leadership of NAPTIP was made up of some of the most reliable and committed persons in the Nigerian administration. It was explained that many Western countries are sharing confidential information with NAPTIP, including the identity of individuals, in order to combat trafficking.

The Western embassy (C) stated that it had never heard of corruption within NAPTIP and had only experienced positive developments within NAPTIP over the past few years. This development relates to – for example – international cooperation, transparency and professional investigation. The embassy emphasized that the increasing number of foreign countries that are approaching NAPTIP for direct cooperation should be seen as an expression of its reliability and positive achievements.

When explained about allegations that NAPTIP is corrupted, involved in human trafficking and is cooperating with criminal groups in Europe Reed Slack emphasized that he had never heard of such allegations before, and stated that “my immediate reaction is that it would be a very, very great surprise if this is the case”.

Reed Slack has worked with NAPTIP for three years during its initial stages, when NAPTIP was supported by the American Bar Association (ABA) and its Rule of Law Initiative via USAID, as an implementing partner for TIP programming. Reed Slack was a former Country Director for ABA in Nigeria and he explained that NAPTIP and its leadership enjoy an extensive goodwill and confidence among the international community and in general. Reed Slack added that he is very well acquainted with the present [i.e. the leadership before the retirement of the former Executive Secretary on February 20, 2009] leadership of NAPTIP.

Reed Slack explained that even though corruption in Nigeria and many other countries is prevalent and one never knows whether contracting partners and agencies are implicated in corruption he would never expect NAPTIP to be corrupted by or to collaborate with traffickers. NAPTIP is considered to be a very competent, transparent and reliable agency among its partners, and Nigeria is one of those countries that are working intensely to combat trafficking. Since its foundation in 2003 NAPTIP has improved considerably in the fields of investigation, prosecution and in its overall capability to assist victims of trafficking.

Reed Slack explained that there had been allegations that a well known NGO in Benin City had been involved in trafficking but such allegations have never been directed against NAPTIP. Reed Slack did not believe the allegations against the NGO in Benin City were credible.

Regarding allegations that the NAPTIP Benin City Zonal Office might be involved in corruption the project staff of a UN organisation (C) stated that this could not be the case. The project staff would have known if this was the case. The project staff had just returned from a week long visit to Benin City. The Benin Zonal Office cooperates with six local NGOs in Benin City, Edo State. These six NGOs formed a NGO coalition named Edo State NGO Coalition against Trafficking in Persons (ENCATIP) in 2002. The six NGOs are the Committee for the Support of the Dignity of Women (COSUDOW), Girl's Power Initiative (GPI), International Reproductive Rights Research Action Group (IRRRAG), Women's Action Initiative (WAI), African Women's Empowerment Guild (AWEG) and Idia Renaissance. The project staff of the UN organisation (C) added that ENCATIP functions very well and that NAPTIP has a very good relationship with all six NGOs mentioned.

During the meeting with the representative of the Danish Immigration Service Reed Slack made a phone call to an NGO in Benin City and asked the director of the NGO if she had heard of allegations during the last 18 months or so that NAPTIP should be involved in any criminal activity, including trafficking and collaboration with criminals in Europe. The director of the NGO stated that she had never heard of such allegations.

Reed Slack was concerned that the basis for the above mentioned allegations could be that victims of trafficking are extremely vulnerable in the sense that they genuinely fear the secret oath that they have taken. This oath implies that they should never [share information] with any authority about their agents and their real story. In order for them not to be returned to Nigeria they might even construct stories or they are made to believe that Nigerian authorities, including NAPTIP is an enemy that will only do them harm. Such beliefs might be exaggerated to the extreme when they realise that false, but very serious accusations might be their very last chance to avoid being returned home. These victims might be the only source of information that most foreign NGOs working to assist victims of trafficking have.

As an example of the victims genuine fear Reed Slack referred to a recent case in Abuja in which a young girl was held up at the airport on departure to Europe. The girl turned out to be a victim of trafficking and she was visibly scared to such a degree that she would or could not speak. She had been intimidated by her traffickers by her secret oath, but she was then assisted by the Nigeria Immigration Service.

Reed Slack emphasized that those who accuse NAPTIP and its leadership to be corrupt or even involved in criminal activities such as trafficking and collaboration with criminal groups in Europe

have a moral obligation to provide solid evidence to the relevant government agencies to allow proper investigation. Reed Slack added that “if you care about the victims, you should cooperate with authorities to bring proper evidence against the people accused to prevent harm to future victims. You cannot make such allegations without actions to be taken. If the claimants have any proof they should be ready to give such evidence to the government of Denmark and/or let NAPTIP interview them so that NAPTIP can take action against the corrupt officials.”

When informed about allegations that NAPTIP is engaged in corruption, irresponsible leadership and administration, trafficking in persons and cooperation with Nigerian criminals in Europe a Western embassy (B) stated that “Nigeria is Nigeria” and that NAPTIP is a relatively new agency. NAPTIP was established in 2003. A number of Western countries are supporting NAPTIP, also in the area of strengthening its investigative capacity. It was added that the investigation activities of NAPTIP is not entirely professional as NAPTIP still lacks capacity, resources and technology.

The Western embassy (B) had not heard [of] these allegations. The embassy stated that corruption is endemic and exist at all levels of the Nigerian society, and it is hard to believe that corrupt practices do not occur within NAPTIP. The embassy emphasised that it had no evidence of any criminal acts committed by employees of NAPTIP.

It was added that people in general in Nigeria do not trust the Government and its agencies. People do not believe that the Government, including NAPTIP is there to help them. The embassy stated that NAPTIP seems generally more ready to assist victims of trafficking that are willing to cooperate and provide evidence against their traffickers in order for NAPTIP to investigate trafficking cases and prosecute, than to assist victims that are unwilling to give evidence. The Western embassy (B) considered that NAPTIP might be focussing on too many issues and tasks, including travel activities. On the other hand most Western embassies in Nigeria have a strong respect for the performance and commitment of NAPTIP’s leadership.

A Western embassy (B) considered that there is a risk that there is corruption within NAPTIP, but added that it did not have any evidence of this and the embassy had no information as to whether NAPTIP is cooperating with criminals in Europe.

When asked if NAPTIP has undergone a negative development in respect to transparency, capacity and commitment the Western embassy (B) stated that no visible negative developments have taken place during the last years. On the contrary one can observe a positive development of NAPTIP since 2007.

When asked if the Nigerian press would report about irregularities within NAPTIP should it become aware of this the Western embassy (B) stated that the press is relatively free in Nigeria and most likely this would be reported. The embassy emphasized that it had not participated in a Stakeholder’s Forum since 2007. However, this participation was described as a positive experience but it only gave a slight indication of the financial management within NAPTIP. The 2007 meeting mainly focused on various anti-trafficking activities undertaken by NAPTIP and NGOs.

The project staff of a UN organisation (C) explained that accusations that NAPTIP is corrupted and involved in criminal activities such as trafficking and collaboration with criminals in Europe were unheard of. The project staff totally rejected such accusations as false and based on unreliable allegations from victims of trafficking abroad. Such unfounded statements should never be considered as evidence as these victims have an obvious agenda, and they might be willing to state

anything that would improve their chances to stay abroad. The project staff considered NAPTIP and its leadership to be very reliable, transparent, and committed to combat trafficking and assist victims of trafficking according to Nigerian law and international conventions and agreements.

The project staff of a UN organisation (C) was employed at NAPTIP as a prosecutor from December 2002 to April 2006, and from May 2006 employed at UNODC as National Project Officer on human trafficking. The project staff had only heard of two cases in each of which a staff member of NAPTIP had been involved in corruption. This was in 2005 and they were severely dealt with. The cases were investigated and the staffs concerned were dismissed.

The project staff of a UN organisation (C) explained that all NAPTIP's Zonal Offices report to the Headquarters in Abuja on a weekly as well as on a monthly and quarterly basis. Any irregularities are reported and there is no reason to believe that NAPTIP is involved in any of the above mentioned criminal activities. Should corruption and other criminal activities occur within NAPTIP, it will always be on a low level. NAPTIP has its own anti corruption unit, and this unit as well as the management of NAPTIP investigate all accusations of corruption against its staff.

Regarding the Stakeholder's Forum the project staff of a UN organisation (C) explained that all Zonal Offices report to NAPTIP the day before the Stakeholder's Forum meeting takes place. The Stakeholder's Forum meeting is a public event in which the media are present. The only thing that cannot be debated at the Stakeholder's Forum meetings is concrete cases under investigation.

The head of a Nigerian NGO (B) considered that NAPTIP is not open to cooperation with all NGOs in Nigeria and the agency should be better to cooperate. It was the head's impression that NAPTIP would only cooperate with selected NGOs that are registered with NAPTIP. It was added that the Nigerian NGO Women Trafficking & Child Labour Eradication Foundation (WOTCLEF) is one of the favoured NGOs and that this is due to the historical relationship this NGO has to the political leadership of the country. Many NGOs have a hard time to get through to NAPTIP and their project proposals on trafficking issues have to go through WOTCLEF and not directly to NAPTIP. Only those NGOs that are registered with NAPTIP can work directly with the agency. Except from WOTCLEF the head of a Nigerian NGO (B) did not know which NGOs are registered with NAPTIP, but NGO (B) is not. The head of NGO (B) added that "we do not make referrals to NAPTIP. We do not have any form of working relationship with NAPTIP."

The head of a Nigerian NGO (B) also regretted that it seems as if NAPTIP has a preference only to assist those victims of trafficking that are willing to cooperate with NAPTIP's investigation unit. NAPTIP also seems to be more ready to cooperate with international donors than Nigerian NGOs. This is the main reason why the local NGOs in Nigeria feel marginalised.

On the recommendation of the Western embassy (B) a Nigerian NGO (A) was consulted as the embassy considered that this NGO had a working relationship with NAPTIP. However, when consulting NGO (A) it became clear that it had no relationship with NAPTIP. This NGO recommended that the above mentioned NGO (B) was consulted as it had a relationship with NAPTIP.

Regarding criticism from some NGOs that NAPTIP is unwilling to cooperate with NGOs, the project staff of a UN organisation (C) stated that NAPTIP has a responsibility to see that the NGOs cooperating with NAPTIP are genuine NGOs and not just private enterprises that do not stand for the concept on non-profit organisations. Any NGO is welcome to forward its project proposals to

NAPTIP for review but NAPTIP has to take responsible and sustainable decisions. The project staff did not agree with other NGOs that WOTCLEF has the right to screen other NGOs project proposals before they are forwarded to NAPTIP. Any proposal coming from an NGO would be submitted to NAPTIP for comments/inputs and/or review as the case may be. The inputs/comments are thereafter forwarded to the NGO for appropriate action or insertion (as the case may be) into the proposal before it is approved for implementation.

Regarding confidence in NAPTIP the project staff of a UN organisation (C) explained that any foreign country can cooperate directly with NAPTIP without any concerns. Foreign countries can even share confidential information in specific cases with NAPTIP. Its database is secure and it has limited access for staff members. A number of Western countries are already sharing confidential information on trafficking cases and issues with NAPTIP. This is an important feature in the fight against international trafficking.

Regarding transparency and fight against corruption a Western embassy (C) explained that NAPTIP does its utmost to secure that salaries to its staff are being paid and to make its financial records and expenditures as visible and correct as possible. It was added that the budget of NAPTIP has been increasing for the last five years, and the increase has been especially notable in the last year.

When informed about allegations that NAPTIP is corrupted, involved in human trafficking and is cooperating with criminal groups in Europe a Western embassy (E) stated that it had never heard of NAPTIP being accused of such activities. On the contrary the Western embassy (E) has a good and functioning cooperation with NAPTIP. The embassy considered that NAPTIP is the best governmental agency in Nigeria when it comes to operational cooperation. However the embassy could not exclude that individual on a lower level in NAPTIP could be involved in corruption and even human trafficking. NAPTIP is always in need of funds and it has happened that NAPTIP has been unable to pay its staff's salaries in time. However, such phenomenons are only related to budgetary problems and not to corruption. The representative of the Western embassy (E) has been employed at the embassy since mid-2006 and the representative had no evidence that the leadership of NAPTIP have been involved in corruption or any other criminal activity.

The Western embassy (E) considered that the leadership of NAPTIP is composed of reliable persons, and if there is evidence of any irregularities within NAPTIP it can only be related to individuals on a low level.

The Western embassy (E) considered that the Stakeholder's Forum offers a reasonable guarantee that NAPTIP remains transparent. It was added that the fact that Nigerian media participate in the Stakeholder's also guarantees that any irregularities or misconduct would be reported in the media.

Finally a Western embassy (E) explained that NAPTIP functions well on the political level but the agency still needs assistance on its operational level.

The police liaison officer of a Western embassy (D) considered allegations that NAPTIP is involved in human trafficking and is cooperating with criminal groups in Europe to be unfounded. The liaison officer expressed profound surprise that these allegations had been brought up, as the liaison officer had never heard about such allegations before. The representative has been employed at the embassy since early 2007 and works closely with NAPTIP.

When asked whether NAPTIP has been flawed by corruption the police liaison officer of a Western embassy (D) explained that on the 24th of October 2007 the embassy as well as many other Western embassies in Nigeria participated in a global operation called KOOL Fish against human traffickers. NAPTIP also participated in this action and if NAPTIP had been corrupt the action could not have been such a great success as it was. Traffickers were arrested in Abuja, Lagos, Benin City as well as in other places in Nigeria. The liaison officer found it very hard to believe that NAPTIP's leadership in Abuja and in its Zonal Offices could be involved in corruption.

It was emphasized by the police liaison officer of a Western embassy (D) that NAPTIP is very cooperative, also when it comes to prosecution of traffickers, and NAPTIP has the capacity to protect victims against their traffickers. The liaison officer had no information that NAPTIP will not do its utmost to protect victims. The liaison officer completely rejected the view that NAPTIP is corrupt and involved in criminal acts such as trafficking. However, it can never be excluded that individuals on a lower level could be involved in unlawful activities such as corruption and trafficking. The liaison officer was aware of one case where a staff member of NAPTIP had been arrested for involvement in trafficking. This took place in connection with the above mentioned KOOL Fish operation on the 24th of October 2007. The liaison officer added that NAPTIP is extremely observant of any signs of illegal acts among its staff, and the liaison officer had no knowledge of any other cases of illegal acts among NAPTIP staff.

The police liaison officer of a Western embassy (D) confirmed that the Stakeholder's Forum is fully transparent and a well performing forum. The existence of the forum is a proof that NAPTIP does not fear transparency and to be subject to public scrutiny. The Stakeholder's Forum is in reality a control mechanism.

When informed about allegations that NAPTIP and its leadership are corrupt and engaged in criminal activities such as trafficking and collaboration with Nigerian criminals in Europe a Western embassy (F) expressed deep concern about such accusations and it did not have any evidences to state that NAPTIP is corrupted. The embassy added that such allegations must be based on evidence and there is absolutely no reason to believe that NAPTIP's leadership is involved in such illegal activities. It was added that Nigeria has shown its determination to comply with international conventions, including the Palermo Convention.

The Western embassy (F) explained that it has a good relationship with NAPTIP. The embassy cooperates directly with NAPTIP, and the police attaché of the embassy and its home country share and exchange information on trafficking cases with NAPTIP. There is a continuing relationship with NAPTIP as trafficking from Nigeria to the embassy's home country is a major concern to both governments. About 30,000 Nigerian citizens are now residing in the embassy's home country, and there are victims of trafficking in this country's major cities.

It was added by the Western embassy (F) that the overall relationship between NAPTIP and the embassy and its home country is transparent and well functioning, and the embassy has no grounds for any concrete criticism of NAPTIP and its leadership.

A UN organisation (A) considered allegations that NAPTIP is corrupted, involved in human trafficking and is cooperating with criminal groups in Europe to be unfounded. NAPTIP has a measure of responsibility and is ready to handle victims of trafficking. The "missing link" is in the chain of reception as some foreign countries are more interested in simply returning victims of

trafficking rather than to assist and reintegrate these victims and monitor their reception in Nigeria. The UN organisation (A) has worked closely with NAPTIP since 2004.

Furthermore, the UN organisation (A) considered that European NGO's claiming that NAPTIP is corrupted are probably doing so in order to retain victims outside the country. Those NGO's may find that it is far better for the victims of trafficking to stay in Europe. It was added that it may be true that many victims will face a certain level of hardship if they are returned to Nigeria, even though they are working in the sex industry in Europe. On the other hand NAPTIP is offering appropriate assistance to returning victims and NAPTIP is ready to do so.

A UN organisation (A) emphasized that it receives donations from a number of Western countries; however these donations are never enough to cover the needs. At the moment over 900 victims of trafficking in Nigeria are in need of assistance, including cash grants but the UN organisation is currently only able to assist about 100 victims with its present funds.

The UN organisation (A) explained that it entrust funds to NAPTIP and the organisation has full confidence in NAPTIP and its administration of its funds. The organisation's cooperation with NAPTIP was described as excellent.

In implementing programmes to support NAPTIP activities or projects on providing assistance to victims of trafficking funded by donors, officials of the donor agencies are involved in implementing the projects to encourage further the level of cooperation and transparency.

NAPTIP consistently holds a Stakeholder's Forum to discuss trafficking issues in Nigeria. The UN organisation (A) considered that the Stakeholder's Forum is an expression of transparency on the part of NAPTIP. It was added that some narrow minded foreign countries claim that Nigeria is totally corrupt. However, this is far from the reality, and only very few governments could claim that corruption does not exist in their country. It was emphasized that NAPTIP is not suffering from corruption or criminal activities.

The UN organisation (A) had never heard of such accusations before and considered them to be based on false information. The organisation entirely rejected that NAPTIP is involved in corruption or any other criminal activities. However, it can never be excluded that individuals on a lower level in the agency can be involved in such activities.

The UN organisation (A) explained that NAPTIP's performance has improved during the last couple of years. The UN organisation also cooperates with the Nigeria Police Force's anti trafficking unit. This cooperation too was described as excellent.

The UN organisation (A) stated that foreign countries can work closely with NAPTIP without concerns, this include sharing of confidential information with NAPTIP's Investigation and Monitoring Unit.

When informed about allegations that NAPTIP is involved in human trafficking and is cooperating with criminal groups in Europe the head of a Nigerian NGO (B) stated that she did not agree that NAPTIP is fully transparent, but NAPTIP is not corrupt or involved in criminal activities.

Muhammad Babandede, Director, Investigation and Monitoring and second in command of NAPTIP was informed about the purpose of the Danish Immigration Service's visit in Nigeria and stated that NAPTIP is used to accusations from some NGOs. Babandede totally rejected the

accusations that NAPTIP is corrupted and involved in trafficking and collaboration with criminal gangs or individuals in Europe. Babandede stated that he did not consider victims of trafficking abroad to be a reliable source of information in relation to such allegations. Such statements on NAPTIPs performance should never be considered as evidence as these victims have an obvious agenda, and they might be willing to state anything that would improve their chances to stay abroad.

Babandede added that for tactical and strategic reasons he would never allow NAPTIP to be corrupted or engaged in criminal activities such as trafficking. If NAPTIP is to cooperate with foreign countries and donors as well as Nigerian NGOs it can never be acceptable if NAPTIP is involved in the activities mentioned.

Babandede regretted that those foreign NGOs that accuse NAPTIP of corruption and criminal activities did not present their evidence to NAPTIP. It was emphasized that NAPTIP would take swift action in order to investigate such accusations if there are any signs that they are based on evidence.

4. NAPTIP's travel activities

An anonymous, but close observer of NAPTIP has recently claimed that the agency is undertaking such a level of international travel activities that its capacity to assist victims of trafficking in Nigeria is accordingly being reduced.

A Western embassy (A) stated that NAPTIP enjoyed considerable esteem internationally and many countries were focusing on NAPTIP's performance and achievements. NAPTIP's representatives were frequently invited to visit foreign and European countries. These travels were in most cases funded by the inviting country.

When asked why some might disapprove of NAPTIP for excessive travel activity a Western embassy (C) explained that of course do NAPTIP experience limits in its capacity, and there is a lack of equipment such as cars, computers and other supplies. From this fact one might understand the reason why this criticism has been expressed. However, the embassy emphasized that it had never heard that the leaders of NAPTIP travel solely for their own benefit, so this criticism is undeserved.

Regarding criticism of NAPTIP for excessive travel activities Reed Slack confirmed that he had heard of such criticism. However, when NAPTIP travels overseas to participate in conferences or meetings it is always on invitation by a host country or an organisation. Such travels have given NAPTIP a very relevant international experience and a much better level of international cooperation. The resources spent on international travels are well spent, according to Reed Slack. He found the criticism unfair and did not understand it.

Reed Slack considered that NAPTIP is doing a very good job and that the agency is functioning well on all levels. However, investigation and re-integration of victims of trafficking is a major concern as it is very difficult to get the victims to cooperate. Some will never give evidence while others will not return to their home areas and be re-integrated. On the other hand one should not criticise NAPTIP for not doing what it can with the financial resources it has been allocated.

Regarding criticism of NAPTIP's travel activities a Western embassy (E) stated that such criticism is groundless as NAPTIP is always undertaking overseas travels on the basis of an invitation from a host country. All expenses in connection with these travels are covered by the inviting host country.

Regarding criticism of NAPTIP's travel activities the police liaison officer of a Western embassy (D) stated that whenever NAPTIP staff travels overseas they are invited and the expenses for flights, hotel accommodation and even per diems are normally being covered by the host country. Thus, the travel activities of NAPTIP do not put any significant pressure on NAPTIP's budget. It was added that the executive secretary of NAPTIP has been invited to visit the home country of the embassy in April 2009. All expenses are being paid by the host country. The liaison officer expressed surprise that someone would criticise NAPTIP for its travel activities. International interactions are a very important aspect of NAPTIP's performance and activities. NAPTIP's leadership enjoys a remarkable goodwill in the international community.

Regarding criticism of NAPTIP's travel activities the UN organisation (A) explained that it is possible that NAPTIP's overseas travels are being funded by the inviting country. The organisation has heard of this criticism but considered it to be groundless. NAPTIP's travel activities should be

seen as an important instrument for NAPTIP to build up its international connections in order for the agency to combat international trafficking in persons.

The head of a Nigerian NGO (B) considered that NAPTIP's overseas travel activities are far too much and these activities have a negative impact on the ground in Nigeria. This result in fewer resources is left to assist victims of trafficking in Nigeria. NAPTIP is focusing too much on international trafficking [rather] than trafficking within Nigeria.

5. Return of victims of trafficking from Western countries and cooperation with NAPTIP on returns

IOM noted that trafficked persons should, as far as possible, be repatriated through voluntary return schemes and assisted with reintegration in the country of origin. Repatriation should also be organized on advance, and include a risk assessment and an assessment for family reunification. In case of witnesses bearing damaging evidence, the security assessment in the country of origin should be coordinated. The focal point in Nigeria is NAPTIP and any repatriation of trafficked persons should be coordinated with the agency so that appropriate measures can be implemented upon return. IOM is aware of a case of repatriation coordinated with an NGO in Nigeria. The NGO went to pick up the beneficiary to the airport but it was a “no show”.

IOM noted that the National Plan of Action and the National Policy on the Protection and Assistance to Trafficked Persons in Nigeria, calls for the establishment of an international referral system to decrease the level of vulnerability of trafficked persons during and after the return process.

Regarding the return of rejected asylum seekers to their home country a Western embassy (A) stated that escorted return flights take place. So far no cases of human trafficking victims have been returned to Nigeria.

A Western embassy (B) had no information regarding [forced] returns of victims of trafficking from its home country to Nigeria. However, the embassy was aware that forced return of Nigerians has taken place from the embassy’s home country, but had no information about the reason. A number of female Nigerians have returned to Nigeria from the embassy’s home country in 2008, but these returns were all voluntary and they took place in coordination with and support from IOM. The embassy cooperates with IOM in the home country of the embassy and with IOM in Abuja and Lagos, Nigeria.

When asked if the home country of a Western embassy (E) is returning victims of trafficking to Nigeria the embassy explained that victims of trafficking who cooperate with the police and give evidence will be granted residence permit on a case by case basis. It was added that the embassy has requested NAPTIP to coerce the priests that are taking part in the intimidation of the victims to talk with their victims in order for the victims to be freed from their secret oath.

Regarding return of rejected asylum seekers the police liaison officer of a Western embassy (D) explained that some returns take place by chartered planes. The Nigerian Government is not informed about the returnees’ motives of asylum. The Nigerian authorities are only informed that the returnees are considered illegal immigrants in the home country of the embassy. These chartered flights take place about twice a year, and they are often carried out in collaboration with other European countries. Altogether 450 rejected asylum seekers are being returned annually on chartered flights from the embassy’s home country.

In addition to the above mentioned returns one rejected asylum seeker is deported from the embassy’s home country to Nigeria on a daily basis, according to the police liaison officer of a Western embassy (D). The liaison officer had never experienced that returnees has had problems with the authorities upon return. In the case that a returnee is a victim of trafficking the embassy always involves NAPTIP before departure to Nigeria if the victim approves.

Furthermore, the police liaison officer of a Western embassy (D) explained that the home country of the embassy also deploys its own Quick Reaction Teams to Nigeria in case there are clear indications that Nigerian travellers to the embassy's home country could be victims of trafficking. If this is the case NAPTIP as well as IOM is informed in order to assist these victims.

6. The resignation of the Executive Secretary of NAPTIP

A UN organisation (B) understood that a moment ago [on the morning of February 20, 2009] the Executive Secretary of NAPTIP had been removed or retired from office. As the removal or retirement was most recent, the UN organisation was not aware of the reasons for the removal or retirement. About a week after the removal or the retirement a UN organisation (B) was again asked if there would be any additional information on the change of leadership in NAPTIP. The UN Organisation (B) replied that there is “nothing beyond what can be read in the press.”

On Friday, February 20, 2009 the Nigerian newspaper *The Guardian* reported that President Umaru Musa Yar'Adua had approved the retirement of Mrs. Carol Ndaguba as the Executive Secretary of the NAPTIP. The Guardian explained that Mrs. Ndaguba was “appointed in January 2006 but section 6 of the law establishing the agency says the executive secretary must be appointed from the Directorate cadre of the civil service. But Ndaguba's age when she joined the civil service shows that she was born in 1945 and therefore had retired from the service in 2005, having attained the retirement age of 60. This means that she was no longer in the Directorate cadre of the service as required by law. Her subsequent appointment as the NAPTIP Executive Secretary was therefore invalid. The Guardian learnt last night [Thursday, February 19, 2009] President Yar'Adua has approved that a lawyer, who is a director in the civil service, Mr. Simon Egede, should take over from her.”

IOM confirmed that the new Executive Secretary for NAPTIP is Simon Egede, Attorney General's Office, Ministry of Justice.

When asked if there was any further information regarding the sudden change in the leadership of NAPTIP Reed Slack stated that “I learned on Friday that Mrs. Ndaguba had been retired, but I don't yet have any additional information as to the reasons behind the change. I suspect that the likely reason would be related to internal issues between the Ministry and NAPTIP, and I do not think the change is connected in any way to the issue you are investigating.”

Following the sudden retirement of the Executive Secretary of NAPTIP on Friday, February 20 Reed Slack was asked if this fact would change any of his comments to the Danish delegation Reed Slack stated that: “I have not changed my views regarding the allegation. I still believe it would be very doubtful that the leadership of NAPTIP were complicit with traffickers or criminal networks.”

Regarding the sudden change of NAPTIP's leadership Babandede explained that the change came as a real surprise to everyone in NAPTIP and observers as well. However, the present Government is only about two years old and it could have undertaken this change at any time before now. The appointment of Directors or Executive Secretaries is political, and it is up to the Government to decide who the Executive Secretary of NAPTIP is.

Babandede confirmed that a new Executive Secretary for NAPTIP has been named and took office Monday February 23, 2009. Babandede had just had a meeting with the new Executive Secretary and it is apparent that no further changes in the leadership of NAPTIP will take place. Babandede emphasized that NAPTIP's organizational structure and its operations will continue as usual.

Babandede emphasized that the removal/retirement of the former Executive Director has nothing to do with corruption charges or any other irregularities within NAPTIP.

According to the personal opinion of a representative of UN organisation (A) the sudden change in NAPTIP's leadership is not connected with any corrupt practices on the part of the Executive Secretary. The appointment was by the past administration and change of leadership of agencies in Nigeria is an ongoing phenomenon. If the change was due to corruption in the part of leadership, this would have been made public.

The UN organisation (A) stated that "the change in leadership has not changed our responses as a UN agency. Building institutional capacity of NAPTIP as an organization to deliver preventive and protective services for child victims and survivors of trafficking is ongoing, and does not depend on a single individual."

The UN organisation (A) added that "we hope to continue providing support to ensure NAPTIP carries out its mandate excellently in Nigeria."

A Nigerian NGO (B) had no knowledge about the retirement or removal of the Executive Secretary and it had no information regarding the change in the leadership of NAPTIP.

Regarding the sudden change of NAPTIP's Executive Secretary, the project staff of a UN organisation (C) had no reason whatsoever to suppose that this change is related to any irregularities among the leadership of NAPTIP or the Executive Secretary herself. The retired Executive Secretary enjoyed an immense respect and was seen as very reliable and committed leader for NAPTIP. All relevant UN organisations have always had an excellent cooperation with NAPTIP and its leadership.

A Western embassy (C) stated on March 2, 2009 that "the previous leadership [i.e. the leadership before the retirement of the former Executive Secretary on February 20, 2009] of NAPTIP was made up of some of the most reliable and committed persons in the Nigerian administration." The embassy had no further information regarding the resignation or retirement of the former Executive Secretary.

Consulted sources of information

A Nigerian NGO (A)

A Nigerian NGO (B)

A UN organisation (A)

A UN organisation (B)

A UN organisation (C)

A Western embassy (A)

A Western embassy (B)

A Western embassy (C)

A Western embassy (D)

A Western embassy (E)

A Western embassy (F)

Muhammad Babandede, Director, Investigation and Monitoring, NAPTIP

Reed Slack, Chief of Party for an American NGO, previously Chief of Party for the American Bar Association's Rule of Law Initiative

Tommaso De Cataldo, Chief of Mission, International Organisation for Migration (IOM)

Abbreviations

ABA – American Bar Association

AWEG – African Women’s Empowerment Guild

COSUDOW – Committee for the Support of the Dignity of Women

DIS – Danish Immigration Service

ENCATIP – Edo State NGO Coalition against Trafficking in Persons

GPI – Girl’s Power Initiative

IOM – International Organisation for Migration

IRRRAG – International Reproductive Rights Research Action Group

NAPTIP – National Agency for the Prohibition of Traffic in Persons and other related matters

NGO – Non-Governmental Organisation

NIS – Nigeria Immigration Service

NPF – Nigeria Police Force

TIP – Trafficking in Persons

UN – United Nations

UNODC – United Nations Office on Drugs and Crime

USAID – United States Agency for International Development

WAI – Women’s Action Initiative

WOTCLEF – Women Trafficking & Child Labour Eradication Foundation