**Feedback on Draft General Recommendations on Trafficking in**

**Women and Girls in the Context of Global Migration**

Comprehensively written recommendations. We agree with all the recommendations and would appreciate if the following points are considered.

**IV. Root causes and discouraging the demand that fosters exploitation through trafficking**

**e. Root causes of trafficking in women and girls and discouraging the demand that**

**fosters their exploitation through trafficking**

Paragraph 29 (j) - “Provides judges, prosecutors, criminal, financial and border police, asylum and immigration authorities and other law enforcement officials with mandatory training in its gender-sensitive application” - Along with Gender Sensitive Training, Trauma Informed Approach should also be introduced and applied in implementing a comprehensive gender sensitive anti-trafficking legislation.

**g. Women and girl migrants’ increased risk of being trafficked**

Paragraph 56 (b) - Along with sensitivity training, Trauma informed Approach should also be introduced to individuals tasked with providing assistance and protection services to migrant women.

**V. Victim identification, assistance and protection**

**a. Victim identification**

Paragraph 68 (b) – for the capacity building of law enforcement and border personnel, immigration and asylum authorities, labour inspectors, social workers and health-care professionals, to also include training on Trauma-Informed Approach (TIA) in engagement with victims and responding to their support needs.

**b. Victim assistance and protection**

Paragraph 72 - to include recommendation that public policy supports and advances the practice of TIA in preventing and responding to human trafficking victimization. In the US TIP Report 2018, it was recognised that “to appropriately support survivors, a trauma-informed approach should be incorporated across all anti-trafficking efforts, including during the criminal justice process and while providing victim services when carrying out prevention strategies and when engaging with survivors in the context of public awareness and media reporting.” As TIA is now widely recognised as an appropriate response to victims of human trafficking, there must be a strong recommendation for all State parties to adopt not only a gender-responsive approach but also a trauma-informed approach as well.

**VI. Victims’ access to justice**

Paragraph 84 (e) - TIA must also be included in the training for lawyers, judges, prosecutors and police officers, and even interpreters.

Paragraph 89 – considering that corruption and complicity of government officials are significant factors that cause and perpetuate human trafficking, there should be more emphasis in the recommendations to address this area. For example, to set up a national reporting mechanism for complaints or reporting of corruption or complicity of government officials in human trafficking cases or a special “internal affairs” ATIP unit which will investigate claims of complicity of government officials in human trafficking cases. Can the Committee offer feasible, good practices on how States can address corruption and complicity?

**Other comments:-**

The General Recommendations are addressing women and girls. However, there seems to be a lack of specific recommendations for minors (girls). There should be child specific measures recommended e.g. in victim assistance and protection, for minors, there should be a child advocate/specialist assigned to ensure that child-appropriate interventions/services are provided for minor victims, which includes not only protection services but also during the investigation and prosecution process. The General Recommendations should be more explicit about meeting the special needs and considerations of girls.