CA3 Assignment

Research Report

Subject: **Bharatiya Nyaya Sanhita**

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Chapter I.

*Introduction to Human Trafficking*

**1.1 Background**

Human trafficking. Two words, sixteen letters. This short two-word expression is anything but simple or straightforward. Diving into the world of human trafficking will bring to light its murkiness and reveal the filth that is associated with human trafficking. The trafficking of human beings leaves despair and devastation in its wake, ravaging the lives of countless people worldwide. Trafficking is rampant, ever-present and not something that is likely to go away any time soon. The entire industry is built on the foundation of human suffering and vulnerability. Exploiting people and taking advantage of them in their powerless situations forms the crux of human trafficking. From small-scale operations to huge cartels, human trafficking spans the globe. Humans are exchanged, money is paid and human trafficking continues to be a flourishing industry with extremely high stakes for all those involved.

**1.2 Introduction**

Human trafficking is a stain or a blot on the existence of humankind. This is the only way to describe something that robs the happiness of millions of worldwide. The world of human trafficking entails activities which are beyond the imagination or comprehension of normal human beings. Only someone who has been exposed to the harrowing and grim shadows of human trafficking will be familiar with how the abominable world of human trafficking operates. Whoever has had a taste of how trafficking works will certainly say that it is nothing but a world of mystery. No one quite knows how human traffickers carry out their affairs and remain operative. It is an extremely convoluted maze and not many make it outside to recount the horrors of trafficking.[[1]](#footnote-1)

**1.3 Meaning of Human Trafficking**

Before delving into the specifics of this study, it is necessary to throw light on the meaning of human trafficking. Human trafficking, or alternatively trafficking in persons involves an extensive set of activities. The activities which come under the expansive umbrella of human trafficking are intended to exploit vulnerable human being who fall prey to traffickers. Broadly, human trafficking contains, in itself, a variety of actions for instance, recruiting human beings, their transportation, their transfer and even harbouring such individuals. That is not all. Trafficking in persons further includes the receipt of these human beings. For the most part, the human beings who are trafficked usually have no say in what they can or cannot do. To make sure their orders are being obeyed, traffickers often threaten these individuals or use force. Additionally, traffickers may also make use of other forms of coercion or harassment. Human beings who fall into the trap of human trafficking are regularly kidnapped or abducted. Fraud and deception are central to the world human trafficking. Huge sums of money, too, are involved human trafficking operations. This is extremely scary to think about because the victims of human trafficking exchange hands just by the mere transaction of money. This shows, that in the course of human trafficking operations, the value of human life extends to just as much as the other person is willing to pay. The fundamental purpose of all human traffickers is the exploitation of human beings. This exploitation can take on many shapes and forms. The list may begin from sexual exploitation, to prostitution, exploitation for domestic purposes, forced labour, subjugation and even slavery and servitude. It does not end here. The most atrocious human traffickers also deal in human organs where the organs of the victims of human trafficking are removed, generally by force or without their consent or free will.[[2]](#footnote-2) Human trafficking spares no one. Men, women and children, alike may fall victim to the horrors of the labyrinth of human trafficking.

Human trafficking is a universal problem. The ubiquity and pervasive nature of human trafficking has made it all the more difficult to erode. At present day, the scale of human trafficking is widespread with no signs of slowing down. The magnitude of human trafficking can be understood by looking at the production of goods across the world. Much of the production of goods over the world have been tarnished by the labour of those forced to work by slavery or servitude.

**1.4 Review of Literature**

*Books*

Kathryn Cullen-DuPont in her book titled ‘Human Trafficking’[[3]](#footnote-3) discusses the various aspects of human trafficking in detail. This is a powerful piece, where DuPont has aptly described human trafficking as one of the most heinous human rights violations. She has also emphasised on the multitude of factors that lead to humans being trafficked such as globalization, abject poverty, government corruption, organised crime and so forth. As rightly stated by her, human trafficking has been in play since the inception of human civilization but the aforementioned factors have only escalated the scale of human trafficking. Today, trafficking takes on diverse forms, with countless victims around the world. DuPont has also highlighted the statistics of human trafficking, stating that most of the trafficked people are women are children. Through her book, she draws our attention to the frightening number of persons being trafficked. DuPont throws light on how the trafficking industry impacts our lives in ways which we might not even realise.

John Winterdyk in his book ‘Human Trafficking: Exploring the International Nature, Concerns and Complexities’[[4]](#footnote-4) explores the crime of human trafficking, skilfully describing it as an impediment to the most fundamental human rights. Human trafficking transcends national boundaries and upsets the balance of global order. Winterdyk recognises how human traffickers operate in almost every corner of the globe from impoverished countries to wealthy, developed nations. People from all walks of life are susceptible to getting trafficked. This world-wide network of human trafficking is burgeoning because of the helplessness and vulnerability of human beings.

A compelling book titled ‘Human Trafficking Around the World: Hidden in Plain Sight’ by Stephanie Hepburn and Rita J. Simpson[[5]](#footnote-5) debates on the world of human trafficking. The authors have brought forth the stark reality faced by those who experience human trafficking, something that we could never imagine. It is a moving piece of literature which examines human trafficking in different countries across the globe, highlighting that this is a crime which is not confined to any particular region. The authors have unfolded the horrifying scenarios of human trafficking in their book.

*Journal Articles*

An impressive article by Rhacel Salazar Parreñas, Maria Cecilia Hwang and Heather Ruth Lee[[6]](#footnote-6) deals with the crime of human trafficking. In their article, the authors have discussed what comprises human trafficking and the distinct attributes of human trafficking. This article is extremely eloquent and well-written, providing a well-rounded meaning of human trafficking. Understanding human trafficking is primary to conducting a study on this topic.

A spectacular piece of literature written by Vimal Vidushy titled ‘Human Trafficking in India: An Analysis:’[[7]](#footnote-7) provides an in-depth insight into condition and statistics of human trafficking in India. The author has elaborated on the factors that lead to humans getting trafficked and divided these factors into two categories to make it more comprehensible. This is an excellent article to understand the position of India on human trafficking.

*Internet Articles*

The United Nations Office on Drugs and Crime[[8]](#footnote-8) together with a non-profit organization, MARG (Mankind in Action for Rural Growth) brought forth the story of a fourteen-year-old girl who had been taken to Delhi so that she could be exploited and trafficked. This article has beautifully illustrated the incidents which the little girl went through.

Another article titled ‘In India, Human Traffickers Target Tribal Women and Girls’ by Sarah Aziz[[9]](#footnote-9) is a lovely piece on the victims of human trafficking in India. Through this article, the author has been able to bring to light the story of another child who was trafficked and forced into domestic servitude. The article contains the actual account of all that the child went through and the pain and torment she had to suffer at the hands of the person who employed her.

*Legal Instruments*

*The Bharatiya Nyaya Sanhita, 2023[[10]](#footnote-10)*

This specific statute is one of the primary legislations that regulates and consolidates the law related to offences and penal provisions in the country. The Bharatiya Nyaya Sanhita contains, within itself, several offences such as, offences against women and children, offences affecting the human body, offences against the State, offences against public tranquillity, offences relating to public servants, and so forth. Among these, Chapter VI, on offences affecting the human body is pertinent to our study. This chapter includes two sections, Sections 143 and 144 which deal with the trafficking of persons and the exploitation of trafficked persons respectively. These sections directly discuss the offence of human trafficking.

Section 143 provides the meaning of the offence of trafficking. The meaning of trafficking as provided in this section is quite elaborate and covers the most important points. Section 144 talks about the exploitation of a trafficked person, particularly sexual exploitation.

*The Constitution of India[[11]](#footnote-11)*

The Constitution lays down the supreme law of the country. It is a document that comprises of numerous topics such as the fundamental rights, fundamental duties, citizenship, the Directive Principles of State Policy, the Legislature, the Executive and The Judiciary, courts including the High Courts and Subordinate Courts, among others. Of these, Article 23 under Part III of the Indian Constitution is relevant to our area of study.

Article 23 prohibits the trafficking of human beings and it also establishes that trafficking done contrary to this provision is an offence punishable by law. This article explicitly forbids human trafficking and recognizes that every human being has a fundamental right against exploitation. This article guarantees that such activities of human exploitation are against the law and punishable under it. Trafficking is a severe violation of human rights and this has been acknowledged by the Constitution of India.

**1.5 Statement of Problem**

It has been established and acknowledged by the current legal framework in India that human trafficking is a crime and offenders will receive severe punishments. Despite this, trafficking continues to be a widespread crime, with traffickers operating right under our noses. International measures, too, have been taken, but human trafficking persists and has grown into a prosperous industry.

**1.6 Research Objectives**

The objective of the research is to examine and evaluate the hypotheses in light of the responses to the research questions.

* To understand the meaning of human trafficking and its various forms.
* To study the causes of human trafficking in India.
* To explore human trafficking in both developed and less developed nations and the reasons for such trafficking.

**1.7 Hypotheses**

Human trafficking is restricted to the less developed nations because of their weaker socio-economic condition. People living in developed countries do not have to face issues of this sort and human trafficking is not even a thing in the better developed nations.

**1.8 Research Questions**

* What is human trafficking?
* What are the causes and reasons behind humans getting trafficked?
* Why is human trafficking such a pervasive issue despite numerous measures?
* Is it only the less privileged people that are susceptible to trafficking or does it happen in developed countries as well?

**1.9 Research Methodology**

The researcher has employed doctrinal research in this study and has embraced a doctrinal approach to carry out the study. The researcher has drawn on and utilized both primary and secondary sources of literature to conduct a thorough and in-depth study on the offence of human trafficking. The researcher has made use of various sources such as books, journal articles, Internet articles, Indian statutes and other such relevant doctrinal material.

Chapter II.

*The Trafficking of Humans in India*

**2.1 Human Trafficking in India**

As a developing nation, human trafficking runs rampant in India. It serves as a hub for the trafficking of human beings with hundreds and thousands of individuals becoming the targets of human traffickers. These traffickers use such individuals to fulfil their own nefarious intentions, and these people remain at the mercy of the human traffickers. The human trafficking industry thrives on the vulnerability and helplessness of its victims. Innocent people are duped and lured into the insidious world of human trafficking. Traffickers mostly target those who are powerless and helpless or those who do not quite know about human trafficking. They exploit those who are subject to poverty, who would do anything just to earn a little money. Illiterate people, too, are prone to being trafficked.[[12]](#footnote-12)

**2.2 Causes of human trafficking in India**

There are a great deal of reasons that propel human trafficking in India. These factors drive the trafficking of human beings in India, contributing to more and more people becoming embroiled in the agonies of human trafficking. The presence of these factors frequently lead to individuals getting trapped in the world of human trafficking. On the whole, the reasons behind human trafficking can be categorised into two segments: **Push factors and pull factors[[13]](#footnote-13)**.

Largely, the factors that can be segmented as push factors are abject poverty and destitution. Poverty is one of the main drivers of human trafficking. It creates hopelessness and misery, making people desperate and needy. Those who are subject to extreme poverty are, very often, willing to do anything that will take them out of their miserable situations. Traffickers flourish on this misery and despair. The distress of such individuals helps traffickers in luring them into the world of human trafficking. Once they enter, it is very challenging for them to leave. This financial insecurity combined with a lack of education and the deficiency of a steady flow of income makes these people prone to human trafficking. The absence of a constant supply of income pushes families to send their children away in search of more lucrative jobs and employment opportunities. Traffickers, in the guise of agents or employers, trap these individuals in their quest for jobs. These traffickers put up a façade of being helpful and considerate and innocent individuals, unwittingly, get lured into human trafficking.

The aforementioned employment prospects form the pull factors. The anticipation of fruitful and rewarding employment opportunities urge individuals to blindly follow the instructions of the human traffickers who pose as job employers. The likelihood of such individuals eventually getting duped and confined to the darkness of human trafficking is very high. With the promise of employment opportunities in metropolitan cities and a high pay, human traffickers prosper on the impoverishment of such individuals. To them, these employment opportunities reflect their dreams of a brighter future. The traffickers are aware of what will incentivize these desperate individuals and they take advantage of their weaknesses and helplessness.

**2.3 Forms of Human Trafficking**

Human trafficking can take on a multitude of forms, as described above. The classification of human trafficking is generally done on the basis of the work that the victims are made to do by the traffickers[[14]](#footnote-14). Some of the most common forms of human trafficking that are widely prevailing have been elucidated below.

**2.3.1 Forced labour** is one of the main forms of human trafficking. Forced labour entails an individual working against his or her will, in essence, being forced to work. More often than not, those individuals who are forced to work do not receive any kind of compensation. They are compelled to work by violence being inflicted on them. They are intimidated or threatened with dire consequences if they try to quit. Restrictions are placed on such individuals; they are not allowed to do anything of their choice.

**2.3.2 Domestic servitude**, particularly involuntarily, is another kind of forced labour. Here, an individual works in someone’s place of residence. Domestic labour involves cooking, cleaning, household chores and even taking care of children. The victims of domestic may, oftentimes, be children themselves. Domestic servitude falls into the realm of trafficking when the employer uses force, threats and coercion to dominate the individual. Such individuals are unable to seek recourse to public authorities because they remain alone and isolated. They remain under the view that they do not have any option but to carry on with their situation as it goes on.

**2.3.3 Bonded labour**, another form of human trafficking, comprises of an individual being induced or deceived into taking a loan. Subsequently, the individual is required to work in order to repay the loan. However, the type of work or its duration is not specified or fixed. The individual, being under a compulsion to settle the loan, has to agree to the whims and demands of the trafficker. The trafficker can make the victim of such deception work according to his wishes. Monetary compensation is uncommon and the individual often receives shelter, food and clothing in return for his efforts. These kinds of debts can extend over generations, if the original victim is unable to repay the loan. Once someone is trapped in the cycle of bonded labour, it becomes very hard for the individual or his family to exit this hellish cycle.

**2.3.4 Sex trafficking** is one more harrowing form of human trafficking during which an individual is forced to perform sexual acts for commercial purposes. Sex trafficking is synonymous with non-consensual sexual activities, by coercion, fraud or force. Victims of sex trafficking are regularly traded for money. The traffickers ‘give’ these victims to the people who pay the highest amount of money. Sex trafficking goes hand-in-hand with monetary negotiations and transactions.

**2.3.5 Child trafficking** is another type of human trafficking, consisting primarily of the exploitation and maltreatment of children. In case of child trafficking, children have to carry out different forms of labour, many of which may be hazardous and risky, like working at a construction site. Children may also be sexually exploited, as adults are.

Apart from these, there can be other forms of human trafficking which do not fall into any of the categories above. This does not imply that those activities would not constitute human trafficking. Anything which conforms to the general explanation of human trafficking will embody its meaning.

**2.4 Human Trafficking Incidents in India**

The tale of a young 14-year-old girl who fell prone to human trafficking was outlined by the United Nations Office on Drugs and Crime (UNODC)[[15]](#footnote-15). The UNODC worked closely with a non-profit organisation to bring the horrific experience of the young girl to light. The little girl’s father shared that she went missing from her town, Darjeeling. The non-profit organization started looking into the activities of the girl before she went missing. They talked to her friends in school and obtained information about her life at home and who she used to talk to over the phone. After that, they realised that the girl may have been taken to Delhi. The non-profit organisation got in touch with the Central Bureau of Investigation (CBI) in Delhi. Soon after, the CBI and the law enforcement agencies were able to track the girl down. They successfully traced her whereabouts and recued her.

Furthermore, another case involving the trafficking of a little girl was uncovered[[16]](#footnote-16). A young girl who was merely eight years old became one among the countless victims of human trafficking. According to the tale recounted by the little girl, a woman went to her house in her village and convinced her mother to send her daughter with that woman. The woman assured her mother that she would finance the girl’s education as long as she sent her daughter to the capital city Ranchi in Jharkhand. The family was stuck in poverty, so her mother agreed readily. In the city, the little girl was made to work in the woman’s house and had to do household chores. All the household work had to be done by the young girl and she also had to take care of their children. Her employers starved her, did not give her enough food to eat and warned her not to cry at the injustice done by them. Three long years later, at the age of eleven, the girl returned to her village. Concluding her tale, the girl stated that she would, under no circumstances, wish for anyone to go through what she had experienced.

Chapter III.

*Indian Legal Framework for Human Trafficking*

**3.1 The Constitution of India[[17]](#footnote-17)**

One of the fundamental rights provided by the Indian Constitution is the right against exploitation. Under this right, Articles 23 and 24 restrain the exploitation of human beings. Article 23 forbids human beings being trafficked and forced labour. This article also confirms that trafficking of human beings or forcing them to work against their will is an offence punishable in concurrence with the law. This article clearly prohibits human trafficking. The fact that human trafficking is a gross violation of general human rights has been aptly acknowledged by the Constitution of India. Article 24 of the Constitution prohibits the employment of children in factories or other dangerous forms of employment, essentially banning child employment.

**3.2 The Bharatiya Nyaya Sanhita[[18]](#footnote-18)**

Sections 143 and 144 of the Bharatiya Nyaya Sanhita are the foremost sections dealing with the offence of trafficking in persons. The meaning of human trafficking has been very clearly illuminated by this section. This meaning of trafficking in persons is quite wide and extensive and covers all the essential elements of human trafficking. The subsections of Section 143 explain the punishments to be given for the offence of human trafficking. According to the section, the punishment for the offence of trafficking is rigorous imprisonment for seven years which could extend to ten years. The offender shall also be liable to pay a fine. This penalty has been specified under Sectio 143(1) of the Bharatiya Nyaya Sanhita. Additional punishments have been laid down in this section for the different instances of human trafficking.

Section 144 of the Bharatiya Nyaya Sanhita mentions that sexual exploitation of a person who has been the victim of human trafficking. It also lays down the punishments for the sexual exploitation of a trafficked child or a trafficked person. The sexual exploitation of a trafficked child is a crime punishable with a minimum of five years of rigorous imprisonment which may be extended to ten years. A person who engages a trafficked person in sexual exploits will be punished will a minimum of three years of rigorous imprisonment. Such imprisonment might also extend to seven years. In both situations, the offender shall also be made to pay a fine.

Some specific forms of human trafficking have been dealt with under different legislations. Although human trafficking or trafficking of persons have not been particularly mentioned, these legislations prohibit the various forms of human trafficking.

**3.3 The Bonded Labour System (Abolition) Act**

Section 4 of this legislation lays out the abolition of the system of bonded labour. Under this section, no one can be compelled or forced to perform any kind of act which comes within the purview of bonded labour. The enforcement of this legislation frees any person from the shackles of bonded labour.

**3.4 The Child and Adolescent Labour (Prohibition and Regulation) Act**

Section 3 of the legislation mentioned above prevents and prohibits the employment of children in any occupation. From this, it can be gathered that child trafficking for the purposes of domestic employment is not allowed. The language of this section insinuates that a child cannot be engaged in a job. Furthermore, Section 3A of this act states that children must not be employed in hazardous or dangerous occupations like in mines, dealings in explosives and inflammable products and substances and other hazardous processes.

The legislations and legal regulations above provide an outline of the legal framework in India with regard to human trafficking. In spite of these regulations, trafficking in human beings is an ever-present issue. This cycle of human trafficking is not showing any signs of slowing down or decreasing.

Chapter IV.

*Human Trafficking in India* *vis-à-vis Around the World*

**4.1 The position of India on Human Trafficking[[19]](#footnote-19)**

Human trafficking is a significant issue across Asia, particularly South Asia. In such a dire situation, where human trafficking runs rampant and uncontrolled, India has a central role in contributing to the appalling offence of human trafficking. India plays a major part in the networks of traffickers who traffic and smuggle human beings. The country is instrumental in helping human traffickers prosper and grow their network. India is entangled in the intricate web of human trafficking. Men belonging to India’s neighbouring countries like Bangladesh and Nepal are trafficked for forced labour. On the other hand, women and children are also trafficked for forced labour. Apart from this, women and children, frequently, become the victims of sexual exploitation. More than men, women and children fall prey to sexual trafficking and exploitation for sexual activities. The human industry is further worsened by the corruption of police officers. Mere bribes are enough to induce the police to turn a blind eye to human traffickers and their networks.

India is surrounded by countries which frequently have political turmoil and upheavals of the entire governing system. Conflicts in Myanmar have led to scores of refugees seeking shelter and refuge in India. Human traffickers take advantage of the desperation and bleak circumstances of such refugees. The proximity of West Bengal with Nepal and Bangladesh have made the state a hub for human trafficking. The impoverishment which people are subject to make them prone to being trafficked. The eagle eyes of the traffickers catch such desperate individuals who want to break free from their continuous cycle of poverty.

**4.2 The position of the rest of the world on human trafficking**

**4.2.1 Afghanistan[[20]](#footnote-20)** is one of the worst-affected countries as regards to human trafficking. It serves as a harbour for human trafficking, although much of the trafficking takes place within the boundaries of the country. Men and young boys are trafficked so that they can take part in forced labour. Women and children, alike, are exploited and compelled to work in various industries like domestic labour, mining, goods factories, cultivation of drugs, brick-making in brick kilns and so forth. Sometimes, these individuals are trafficked and transported to countries in the Gulf and other countries like Pakistan and Iran. Employment in the Gulf countries often comes with lucrative employment prospects which is attractive to less fortunate individuals. The Taliban rule has further intensified the issue of human trafficking in Afghanistan.

**4.2.2 Syria[[21]](#footnote-21)**, a country known for its political instability and frequent civil wars, ranks high among the countries worst-affected by human trafficking. As a source of human trafficking, people from Syria are routinely transported to neighbouring countries like Jordan, Iraq, Lebanon and Cyprus to be trafficked. Syria is also an important destination for human trafficking. People from neighbouring countries as well as nations like Myanmar and the Philippines are brought to Syria to be trafficked there. The trade of human organs also runs unchecked, where exploited humans are pressurised or coerced to sell their organs, usually on the black market.

**4.2.3 Ethiopia[[22]](#footnote-22)** is a largely a source for human trafficking. As a destination for human trafficking, Ethiopia is not a very common choice for traffickers. This country is well-known for being a transit country for individuals trafficked to other countries in the African subcontinent, Middle Eastern countries and even countries in Europe. Trafficking out of Ethiopia primarily follows three routes. There is a Southern route leading to Kenya where individuals are further transported to other countries in the South of Africa. After that, there is an Eastern route toward Djibouti, Eritrea and Yemen. Lastly, there is a Western route that traffickers could take which would lead them to Sudan and South Sudan. Men, women and children are trafficked to take part in forced labour and sexual trafficking and exploitation. Wars and unrest in the country have escalated the instances of human trafficking and have put people at the risk of exploitation, slavery, abuse and other forms of mistreatment.

**4.2.4 The United Kingdom[[23]](#footnote-23)** is a crucial destination for the victims of human trafficking, especially from Asia and Africa. On occasions, victims may also come from Eastern European countries like Belarus and Moldova. The most common forms of human trafficking are sexual trafficking, forced labour and domestic servitude. Children comprise a huge segment of the trafficked victims, forming almost a third of all victims. Individuals who extend their stays beyond the duration stipulated by their visas also become prone to trafficking.

**4.2.5 The United States’[[24]](#footnote-24)** human trafficking network thrives on both domestic and international victims. International victims of human trafficking often come from nations like Honduras and Mexico. People from Mexico form the largest group of trafficked individuals into the United States of America. Others originate from Honduras, Brazil and Venezuela. Vulnerable men, women and children such as drug users, homeless persons and persons subject to disabilities become the victims of this heinous crime.

**4.3 Conclusion**

The conclusion that ensues from the findings of this study is that the initial hypothesis has been proved successfully. From the information above, it is apparent that human trafficking takes place not just in less developed nations but also in more developed countries like the United Kingdom and the United States. However, these developed countries act as destinations for the victims of human trafficking rather than source nations.[[25]](#footnote-25) Additionally, people belonging to rich countries like those in the Gulf are also immune to getting caught in the tentacles of human trafficking.

1. Rhacel Salazar Parreñas, Maria Cecilia Hwang, and Heather Ruth Lee, ‘What is Human Trafficking? A Review Essay’ (2012) 37 (4) Signs: Journal of Women in Culture and Society, The University of Chicago [↑](#footnote-ref-1)
2. United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime 2000 [↑](#footnote-ref-2)
3. 2 Kathryn Cullen-DuPont, Human Trafficking (Facts on File 2009) [↑](#footnote-ref-3)
4. John Winterdyk, Benjamin Perrin and Philip Reichel, *Human Trafficking: Exploring the International Nature, Concerns and Complexities* (Taylor & Francis 2012) [↑](#footnote-ref-4)
5. Stephanie Hepburn and Rita J. Simpson, *Human Trafficking Around the World: Hidden in Plain Sight* (Columbia University Press 2013) [↑](#footnote-ref-5)
6. *Supra* note 1 [↑](#footnote-ref-6)
7. Vimal Vidushy, ‘Human Trafficking in India: An Analysis’ (2016) 2(6) International Journal of Applied Research at 168-171 [↑](#footnote-ref-7)
8. United Nations office on Drugs and Crime, ‘From Darjeeling to Delhi: Story of a young girl who was trafficked’ available at: <https://www.unodc.org/southasia/frontpage/2013/Sept/india-from-darjeeling-to-delhi-story-of-a-young-girl-who-was-trafficked.html> [↑](#footnote-ref-8)
9. Sarah Aziz, ‘In India, Human Traffickers Target Tribal Women and Girls’ Voice of America News available at: <https://www.voanews.com/a/in-india-human-traffickers-target-tribal-women-and-girls/7235083.html> [↑](#footnote-ref-9)
10. The Bharatiya Nyaya Sanhita, 2023 [↑](#footnote-ref-10)
11. The Constitution of India [↑](#footnote-ref-11)
12. *Supra* note 2 [↑](#footnote-ref-12)
13. *Supra* note 6 [↑](#footnote-ref-13)
14. *Supra* note 3 [↑](#footnote-ref-14)
15. *Supra* note 7 [↑](#footnote-ref-15)
16. *Supra* note 8 [↑](#footnote-ref-16)
17. *Supra* note 11 [↑](#footnote-ref-17)
18. *Supra* note 10 [↑](#footnote-ref-18)
19. India, The Global Organized Crime Index, available at < https://ocindex.net/country/india> [↑](#footnote-ref-19)
20. Afghanistan, The Global Organized Crime Index, available at <https://ocindex.net/country/afghanistan> [↑](#footnote-ref-20)
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23. The United Kingdom, the Global Organized Crime Index, available at <https://ocindex.net/country/united\_kingdom> [↑](#footnote-ref-23)
24. The United States, The Global Organized Crime Index, available at <https://ocindex.net/country/united\_states> [↑](#footnote-ref-24)
25. *Supra* note 5 [↑](#footnote-ref-25)