



Recommendations for Data Management System to Combat Human Trafficking in Saint Lucia

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1) INTRODUCTION

The present recommendations paper is part of the technical assistance (TA) provided by the International Organization for Migration (IOM) in the framework of the ACP-EU Migration Action¹, responding a supporting request made by the Ministry of Home Affairs, Justice and National Security of Saint Lucia.

The objective of the technical assistance request focuses on the prevention of human trafficking by training law and border authorities on effective counter-trafficking measures and dissemination of information on trafficking in human beings, thus sensitizing the general public and creating awareness of the ills of human trafficking.

Saint Lucia has been taking actions to combat human trafficking. In 2010, the government of Saint Lucia enacted the national Counter-Trafficking Act and in 2013, it ratified the Palermo Protocol - the supplemental protocol to the United Nations Convention Against Transnational Organized Crime (UNTOC).

The Saint Lucia Counter-Trafficking Task Force developed by the National Framework for Combating Trafficking in Persons is also part of the government's effort. The Task Force coordinates the action plan, the collection and sharing of data among government agencies, engages in cooperation with foreign countries and civil society organizations, and provides training for law enforcement agents.

Thus, previous to the technical assistance, a baseline assessment (BA) was conducted revealing aspects of the national context to guide the development of the technical assistance. According to the BA, the magnitude of human trafficking in Saint Lucia is unknown and potential cases are possibly unidentified and untackled by law enforcement agencies. Noticed is the need to establish a Data Management System on human trafficking as a support to combat this crime and to protect the victims.

To support Saint Lucia efforts, the ACP-EU Migration Action is presenting this recommendation paper that, combined with the 2017 workshop, the Manual to Combat Human Trafficking and the public awareness campaign, makes an integrated approach to help the Saint Lucian government increase its capacity to tackle human trafficking cases and conditions.

This paper should be used as a guidance to the design and development of the Data Management System by the National Task Force (NTF). Its content was developed based on the outcomes of the rapid qualitative assessment made during the preparation of the technical assistance intervention, in 2017, through interviews with key stakeholders from government agencies and civil society leaders, who expressed their vision and suggestions to combat human trafficking in Saint Lucia.

Suggestions on indicators, models of functioning, human resources capacities, rules and flows are provided in this paper as a means to support the development of the system. We suggest it is used as a guide. We hope it will be useful to that important dimension to combat human trafficking that

¹ For more on the ACP-EU Migration Action: www.acpeumigrationaction.org.int



is knowledge production and context monitoring, resulting in institutions better informed in their decision making and in raising awareness of the population for their own protection.

2) OBJECTIVES OF THE DATA COLLECTION

Combating human trafficking in Saint Lucia should be intensified from now on. With the support of ACP EU Migration Action and other international organizations, the government of Saint Lucia and other national stakeholders are progressively increasing their capacities to face the challenges of building institutional strength. The National Task Force against human trafficking is already aware of the path ahead in terms of public awareness, training, and formalizing partnerships with non-governmental bodies.

By applying information in decision making on immigration, law enforcement, external relations, community and vulnerable populations protection, the government is acting strategically. Because human trafficking is a dynamic and multifaceted crime, it is key to develop a strong data management system to succeed in combating it, understanding how human trafficking evolves and how it affects vulnerable populations.

Thus, it is suggested as a general objective: to generate and maintain an updated data management system on human trafficking in Saint Lucia.

The specific objectives are:

- i. To support the planning of public policies and public budget to combat human trafficking;
- ii. To integrate actions of different stakeholders in the data management system around the combating of human trafficking;
- iii. To monitor specific geographic areas and sectorial themes to identify if and how they are related to human trafficking;
- iv. To support the evidence production of positive achievements in the country in combating human trafficking.

3) BEING PREPARED TO REGISTER DATA WHEN FACING HUMAN TRAFFICKING

The crime of human trafficking is highly dynamic. Because of this, it is advisable to pursue a multidisciplinary approach in all actions, as no stakeholder will have all the answers and competences to face it alone. Experience has shown that police officers working closer with communities, school teachers, health and social protection workers would probably be the first group of professionals to deal with potential situations of human trafficking.

To build an ecosystem of agencies that is alert about the signs of human trafficking and aware on what to do when facing a potential case, it is key to train their teams. It is important to note, that not only high level institutional managers should be trained, but those professionals who are in close contact with clients of their services.



Literature on human trafficking reports situations of victims going unnoticed in public hospitals, family courts, school support services and street police teams. Without noticing the victims' situation, there is no reporting and, consequently, the lack of frequent data. Once professionals and public agents are more aware of what is human trafficking and its signs, the data starts to flow.

When in contact with a case or an incident that has signs of human trafficking, police officers, school personnel, social protection and health workers should immediately make a report to a Hotline number and an Online portal so the National Task Force (NTF) team may start the procedure to analyze the information and proceed accordingly. To strengthen the screening capacity of professionals in detecting the signs, the organizations and agencies should share the same type of screening form. That screening form will provide formal support to ensure the technical team are assessing the basic information about the case they will report later through the Hotline number or the Online portal.

In no situation, school personnel, social protection and health workers should attempt to address by themselves the needs of the victim or to confront the perpetrator, for both safety of the involved people and the future investigation by law agents.

Also for security reasons, if a printing version of the screening form is filled, no personal data on the victim should be kept by the school, the health unity or the social protection service that has reported the case. All information should be transfer to the data management system through the Hotline and Online services, then becoming a responsibility of the NTF.

Periodically, NTF should reconcile the data collected to produce national reports, to inform decision making, to insert the data as part of a project or a program planning process etc. For that reason, a minimum level of standardization is required.

In order to harmonize the information about human trafficking, it is a good practice to start by defining the basic relevant data to be collected and building agreements about it among all organizations that will join the network on data gathering. Once the definition is made, a rapid training process on the subject would be effective. It is fundamental to formalize agreements on data conceptualization and exchange of information.

2.1. The Screening Form

It is recommended that the public agencies engaged in law enforcement actions against human trafficking agree in adopting a very specific set of initial information in order to run screening assessment of the potential cases that may come to their knowledge.

The dataset for screening assessment aims also to play a role of harmonizing the vision on human trafficking among public agents. It is an effective way to have law enforcement teams to get more and more acquainted with the subject by sharing a common understanding.

To internalize the dataset, the agents should work with an initial format, to guide the first phase of assessing data of the potential case they have spotted. Once the positive perception guided by the filling of the screening form, confirms the signs for a potential human trafficking case, the agent should immediately report it to the Hotline or to the Online portal. It is suggested to standardize the *2 step procedure: 1 fill the screening form + 2 report it Online or Hotline.*

Along with that 2 step procedure: 1 fill the screening form + 2 report it Online or Hotline, all the agents must receive recurrent training by NTF members to understand what is human trafficking, the national legal framework, who are the members and what is the mandate of the NTF, the data management system and how to handle the information that needs to be collected.

The following is the suggested screening form to be adopted. It should be printed and delivered to the police teams who work at field level, to immigration agents, to family court teams, to social protection, health and school workers. At least at the beginning, it is suggested that only public agents handle that screening form, as civil society and general audiences will be led to report directly to the Hotline service or Online portal. The reason for that is to diminish the complexity of starting harmonizing data gathered that the NTF will be handling.

As a good criterion in spreading the use of the screening form it is suggested:

- to deliver the screening form + the rules about using it + the Signs Card + a 30 minutes human trafficking talk;
- this may be done in small groups or right in the agents' working environment;
- to avoid complex logistic arrangements;
- to allow a large number of agencies to be covered in a period of a month for instance, and
- make combating human trafficking more closer to the agents' routine tasks.

SCREENING FORM ABOUT POTENTIAL HUMAN TRAFFICKING CASE

Check if: the human trafficking effectively occurred/if it was detected a potential human trafficking situation

Date/period that the trafficking has occurred or that the situation was detected:

Location where the situation has occurred:

Date of the register of the potential situation:

Sex of the victim:

Age of the victim:

Country of birth of the victim:

Ethnicity of the victim:

Type of exploitation to which the victim was submitted:

Have you reported this potential case: no report, report to the NTF, report to the Police Force, report to other agency, please specify

Date that you have reported this potential case:

Your name, post and agency:

It is important to understand that, by effectively using the screening form, a particular agency is assuming that it has spotted a potential case of human trafficking and it will report it to the Hotline or to the Online services. This should be ensured by the agency internal compliance mechanism.

The reporting agency will not have responsibility to ensure the veracity of the case at that phase. From the reception of the data, NTF will take over and will adopt the adequate measures. The role of the agency that spot a case - at that very moment - is to report the data through the official channel.

Reemphasizing as a standard procedure:



- i) Public agencies teams who will use the Screening Form must receive:
- Training on human trafficking and on how to proceed to report a potential case
 - Personal plastic cards with the signs of human trafficking
 - Copies in paper of the Screening Form
 - Information about the Hotline and the Online services, and how to use each one according to the emergency of the case
 - Information about the National Task Force, its mission, its members and how it works
- ii) Once in receipt of the answers to the questions presented in the screening form, the agent who spotted the potential case should immediately report it to the Hotline and Online services. No paper filled with the data should be kept or stored by the agent or the agency in order to protect potential victims.
- iii) The NTF is responsible for receiving, storing and retaining the data reported, through the Human Trafficking Data Management System. No data should be discharged without the authorization of the Data Management Leader and/or the NTF, accordingly to the protocols to be designed and approved.

IMPORTANT NOTE: the screening form is an important tool to install a routine of assessing the signs and registering the information about potential cases among agencies in the country. It is also a tool to ensure an internal compliance protocol within the agencies, engaging a chain of supervision in the process of registering and reporting a potential case of human trafficking. It makes the entire engine of data management system closer to the agents and thus facilitating to build a more engaging environment.

2.2. The Online Reporting

In order to better centralize the data gathering process, an online reporting option should be made available in a portal, connected with the agencies leading the NTF, and linked to others public agencies and organizations' websites that work with vulnerable populations. The online reporting channel is adequate for non-urgency situations while the Hotline is the adequate channel for emergency calls.

A memorandum of understanding among those organizations and the NTF should be signed to make clear the agreement about data gathering, roles, confidentiality etc.

The structure of the online form suggested below is inspired in the model adopted by Polaris².

² <https://humantraffickinghotline.org/report-trafficking>



**IF YOU HAVE INFORMATION ABOUT A POTENTIAL HUMAN TRAFFICKING SITUATION,
PLEASE REPORT IT BY FILLING THE FORM BELOW:**

Read here to understand what is human trafficking:

Human trafficking is the buying and selling of men, women and children within a country and/or across its borders with the purpose of exploiting them to obtain money or other type of benefits.

According to the law, when a person is recruited, transported, harboured or received, under the use of a threat, force, coercion, or fraud, for the purpose of being sexually exploited, or for forced labour, or practices similar to slavery, servitude or the removal of organs, that person is a victim of human trafficking. The criminal is the trafficker and exploiter.

- Type of trafficking (mark those options that apply for the situation as far as you know): sexual exploitation, pornography, on line sexual exploitation, labor, domestic labor, forced marriage, child labour, begging, street selling, other, please specify
- Victim country of birth: national, foreigner, if you know, please write here
- Location of the potential case of trafficking – region, city or village
- Date of the incident or date that you have noted the situation of potential human trafficking
- Potential victims are (mark all options that apply for the situation): female, male, transgender male, transgender female, under 18 years old, older 18 years old, individual alone, group of people, family, national, foreigner
- Open field to provide descriptive details of the situation or incident you would like to report.
- Open field to provide information about the trafficker(s)
- Check here if you prefer to remain anonymous. If you do, please, provide the following information just for statistical reasons: you are male or female; city, village or neighborhood that you live
- Check here if you are comfortable to be contacted by the NTF in case it is needed more detail about the case, and please provide your first name, last name, address and phone number. In case you are a public agent, please inform the name of agency you work for.
- Have you already reported this potential case? No/Yes, reported to which agency? Date of the report?

2.3. The Hotline

To progressively build consistency in registering data on human trafficking, organizations, professionals, communities and victims of trafficking (VoT) need to be led to a Hotline reporting channel. The responsibility to maintain a Hotline number is on the NTF. The Hotline is the adequate channel for emergency calls while the online reporting channel is adequate for non-urgency situations.

It is important to ensure that a 24/7 phone service is provided for the human trafficking Hotline. The calls should be adequately channeled to trained agents or teams to receive the information. A Hotline service is key to provide a better picture both on progressive public awareness on human trafficking and the demographic data in relation to the cases.

The Data Manager will be the agent responsible for receiving the information through the Hotline service (*more on that is detailed next*). It should also adopt a specific form to register the information reported. It is suggested:



HOTLINE REGISTERING FORM ABOUT POTENTIAL HUMAN TRAFFICKING CASE

Check if: the human trafficking effectively occurred/if it was detected a potential human trafficking situation

Date/period that the trafficking has occurred or that the situation was detected:

Location of the situation has occurred:

Date of the register of the potential situation:

Sex of the victim:

Age of the victim:

Country of birth of the victim:

Ethnicity of the victim:

Describe more details about the victim, for example: transgender male, transgender female, individual alone, group of people, family, national, foreigner

Type of trafficking (mark those options that apply for the situation as far as you know): sexual exploitation, pornography, on line sexual exploitation, labor, domestic labor, forced marriage, child labour, begging, street selling, other, please specify

If possible, describe the type of exploitation to which the victim was submitted.

If possible, provide information also about the trafficker(s) or exploiters

Have you reported this potential case? no report/report to which agency, please specify

Check here if the person asked to remain anonymous. Please provide the following information just for statistical reasons: you are male or female; city, village or neighborhood that you live

Check here if the person is comfortable to be contacted by the NTF in case it is needed more detail about the case, and ask her/his first name, last name, address and phone number. In case you are a public agent, Please inform the name of agency you work for.

Date of this report, Name of the Data Manager

4) NEXT PHASES IN MANAGING THE HUMAN TRAFFICKING DATA

The best data on human trafficking is a combination of qualitative and quantitative information that may be acquired from different sources. For the purpose of this recommendation document, the data to be gathered is coming from a direct contact with victims or potential victim of human trafficking. The initial structure of the data management system is made by that dataset. It is aimed to inform public policies and public budgeting decision making, and national and international dialogues.

From that initial structure, additional forms to generate information usually may surge. Field research, desk research, media monitoring or data generated through specific projects will complement the dataset results of the situations and cases of human trafficking, faced by the government and non-governmental organizations in the country.³

³ About the nature of data and the form to collect and to manage it, IOM has important alerts that is worthy to consider when planning a more complex and multifaceted combination of sources: "(...) some important questions to ask include: can meaningful information be obtained by using quantitative indicators? Can objective, convincing information be obtained by using qualitative indicators? Can qualitative indicators be quantified without losing important information? For both quantitative and qualitative analysis, various methodologies can be used to obtain information. Some of the more common methodologies include documentation review, direct observation, interviews, focus groups, questionnaires, surveys and case studies, each with sub-categories and specific procedures." In: Handbook on Performance Indicators to Countertrafficking Projects, IOM, 2008, https://www.iom.int/jahia/webdav/shared/shared/mainsite/published_docs/brochures_and_info_sheets/pi_handbook_180808.pdf

Presented below is set of data to be managed by the NTF team for every case or potential case of human trafficking. Provided by IOM, these questions should be used in the creation of a standard form for the country: the **STANDARD FORMAT TO REGISTER INFORMATION ABOUT HUMAN TRAFFICKING SITUATION**. It will be fed by the expert teams working under the leadership of the NTF to run the investigation, prosecution and protection of the VoT and/or individuals related to the specific situation.

IMPORTANT NOTE: the initial phase of data gathering - 2step procedure: 1 fill the screening form + 2 report it Online or Hotline - aims to activate the entire data management system. It is key to understand that further information is required. The information collected through the Screening Form and the Hotline and Online forms is not sufficient. NTF is in charge to activate the adequate procedures to gather more information accordingly to the need for each specific situation and human being involved. Specialized professionals should be assigned to relate directly with the victims.

STANDARD FORMAT TO REGISTER INFORMATION ABOUT HUMAN TRAFFICKING SITUATION	
A. Registration data	
First name(s):	
Family name(s):	
Sex:	
Country of birth:	
Place of birth:	
Last place of residence in country of origin:	
Date of birth:	
Is date of birth an estimate? (Yes/No)	
Age (in number of years):	
Citizenship:	
Ethnicity:	
Identity document (type, country, number and expiry date):	
B. Case and interview data	
Type of referring organization/individual: (NGO/international organization/law enforcement/immigration/Government/embassy/IOM mission/hotline/self-referral walk-in/family/friend/client/other)	
Name/location of referring organization/individual:	
Screening date:	
Screening location:	
Name of interviewer:	
Name of organization/institution:	
Contact details of interviewer:	
Address and telephone number of referring organization:	
Interviewee's language(s):	



Interpreter? (Yes/No)

Name of interpreter:

If minor: Name(s), address(es) and telephone number of parent(s) or guardian(s):

C. Entry into trafficking

1. How did the individual enter the process (indicate multiple options if necessary)?
2. Did entry into the process involve recruitment? (Yes/No) If Yes, how was the contact initiated between the individual and her/his recruiter? (personal contact/employment agency/travel agency/Internet advertisement/newspaper advertisement/radio advertisement/television advertisement/other)
3. If labour migration, what activity did the individual believe he or she was going to be engaged in following arrival at the final destination (indicate multiple options if necessary)? Agricultural work/begging/child care/construction/domestic work/factory work/ fishing/low-level criminal activities/military service/mining/prostitution/restaurants and hotel work/study/small street commerce/trade/transport/other)
4. What was the individual told would be their benefits following arrival at final destination? Salary (equivalent in \$US per month) Other benefits
5. In which month/year did the individual enter into the process?
6. Minor at the time of entry into the process? (Yes/No)
7. From which place/country did the individual enter into the process?
8. What place/country is the last (or intended) destination?
9. Did the individual travel alone? (Yes/No) If No, who did the individual travel with (indicate multiple options if necessary)? (husband/wife/ partner/relative/ friend/recruiter/transporter/ unknown persons/other)
10. Did the individual spend any time in transit place(s)/country(ies) (Yes/No)
 - If Yes, who did the individual travel with? (husband/wife/partner/relative/friend/ recruiter/transporter/unknown persons/other)
 - Did he or she engage in any activity in this place(s)/country(ies) (Yes/No)
 - If Yes, which activity in first/only transit place/country? (agricultural work/ begging/child care/ construction/ domestic work/ factory work/fishing/low-level criminal activities/marriage/military service/mining/prostitution/restaurants and hotel work/study/small street commerce/ trade/ transport sector/other)
 - If more places/countries, add respective places and activities engaged in.
11. Were any of the following means used to control the individual?
 - Physical abuse Yes/No If Yes, who by? Recruiter/Transporter/Harbourer/Receiver/ Other
 - Psychological abuse Yes/No If Yes, who by? Recruiter/Transporter/Harbourer/Receiver/ Other
 - Sexual Abuse Yes/No If Yes, who by? Recruiter/Transporter/Harbourer/Receiver/ Other
 - Threats to individual Yes/No If Yes, who by? Recruiter/Transporter/Harbourer/Receiver/ Other
 - Threat of action by law enforcement Yes/No If Yes, who by? Recruiter/Transporter/ Harbourer/ Receiver/ Other
 - Threats to family Yes/No If Yes, who by? Recruiter/Transporter/Harbourer/Receiver/ Other
 - False promises/deception Yes/No If Yes, who by? Recruiter/Transporter/Harbourer/ Receiver/ Other
 - Denial of freedom of movement Yes/No If Yes, who by? Recruiter/ Transporter/ Harbourer/ Receiver/ Other
 - Giving of drugs Yes/No If Yes, who by? Recruiter/Transporter/Harbourer/Receiver/ Other

- Giving of alcohol Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
- Denial of medical treatment Yes/No If Yes, who by? Recruiter/Transporter/Harboured/ Receiver/ Other
- Denial of food/drink Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
- Withholding of identity documents Yes/No If Yes, who by? Recruiter/Transporter/ Harboured/ Receiver/ Other
- Withholding of travel documents Yes/No If Yes, who by? Recruiter/Transporter/ Harboured/ Receiver/ Other
- Debt bondage Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
- Other Specify:

D. Exploitation phase

12. What activity has the individual undertaken since her/his arrival in the last destination? Agricultural work/begging/child care/construction/domestic work/factory work/ fishing/low-level criminal activities/marriage/military service/mining/prostitution/ restaurants and hotel work/ study/small street commerce/trade/transport sector/ unemployed/other

13. How old was the individual when the activity began? How long did the only/most significant activity last? Threat of action by law enforcement Yes/No If Yes, who by?

14. Were any of the following means used to control the individual during the activity?

- Physical abuse Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
 - Psychological abuse Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other Sexual Abuse Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
 - Threats to individual Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
 - Threat of action by law enforcement Yes/No If Yes, who by? Recruiter/Transporter/ Harboured/ Receiver/ Other
 - Threats to family Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
 - False promises/deception Yes/No If Yes, who by? Recruiter/Transporter/Harboured/ Receiver/ Other
 - Denial of freedom of movement Yes/No If Yes, who by? Recruiter/ Transporter/ Harboured/ Receiver/ Other
 - Giving of drugs Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
 - Giving of alcohol Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
 - Denial of medical treatment Yes/No If Yes, who by? Recruiter/Transporter/Harboured/ Receiver/ Other
 - Denial of food/drink Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
 - Withholding of identity documents Yes/No If Yes, who by? Recruiter/Transporter/ Harboured/ Receiver/ Other
 - Withholding of travel documents Yes/No If Yes, who by? Recruiter/Transporter/ Harboured/ Receiver/ Other
 - Debt bondage Yes/No If Yes, who by? Recruiter/Transporter/Harboured/Receiver/ Other
 - Excessive working hours Yes/No If Yes, who by? Receiver/Exploiter/Clients/Other
- If exploited for prostitution (sexual exploitation):

- Denial of freedom to refuse client Yes/No If Yes, who by? Receiver/Exploiter/Clients/Other
 - Denial of freedom to refuse certain acts Yes/No If Yes, who by?
Receiver/Exploiter/Clients/Other
 - Denial of freedom to use condom Yes/No If Yes, who by? Receiver/Exploiter/Clients/Other
 - Other means of control Specify:
15. Did the individual experience exploitation? (Yes/No)
16. If no exploitation took place, was there any indication of a real and substantial threat of exploitation? If Yes, what were the reasons that exploitation never took place?
(Rescue/Escape/Other)
- E. Exploitation phase**
17. Additional corroborative materials
- Police or other official reports Yes/No
 - Identity documents Yes/No
 - Travel documents Yes/No
 - Medical reports Yes/No
 - Copies of employment contract or recruitment offer Yes/No
 - Personal writings by the individual Yes/No
 - Hotline reports Yes/No
 - If other, specify Yes/No
18. Is the individual a victim of trafficking? Justify this decision.
19. Decision made by whom (specify names):
20. If the individual is a victim of trafficking, was the type of trafficking in-country or transnational?
(in-country/transnational/both)
21. If the individual is a victim of trafficking, is he or she eligible for the IOM victim of trafficking assistance programme? (Yes/No)
22. If the individual is not a victim of trafficking, is he or she in need of assistance? (Yes/No) If Yes, what is the individual's situation? (Please specify all that applies.)
23. Additional remarks

5) DATA COLLECTED FROM THE VICTIM AND THE INFORMED CONSENT

It is indispensable to adopt procedures to ensure that the victim consents in sharing the information about herself/himself. That may require some time and an expert support in building a trustful relationship with the victim that goes beyond a law enforcement approach. That is a good practice that proves effective to ensure the quality of the collaboration of the victim in the following investigation and prosecution phases. Importantly, in a victim centred approach, his/her safety and wellbeing is priority.

IOM recommends following a sequence of certifying questions, when accessing information from a VoT⁴. It is the role of NTF to ensure the adoption of that approach as part of the preparation formality when interviewing a victim:

⁴ Handbook on Performance Indicators to Countertrafficking Projects, IOM, 2008,
https://www.iom.int/jahia/webdav/shared/shared/mainsite/published_docs/brochures_and_info_sheets/pi_handbook_180808.pdf



**ACCESSING THE VICTIM OF HUMAN TRAFFICKING
CONSENT ON PROVIDING INFORMATION**

1.1. Has the individual been informed that IOM and/or (name of partnering organization) reserves the right to share her/his individual case data for assistance purposes and only with IOM missions and partnering organizations involved in direct assistance? (Yes/No)

1.2. Has the individual further been informed that IOM reserves the right to make a limited disclosure of non-personal data based on the information collected at the interview to law enforcement for the purpose of rescuing other victims that remain under the control of traffickers or preventing other potential victims from being trafficked? (Yes/No)

1.3. Has the individual further been informed that IOM reserves the right to use (only anonymous, aggregate) data for research purposes? (Yes/No)

1.4. Has the individual's full and informed consent been obtained to conduct the screening interview based on information given regarding the role of the organization, the voluntary nature of the interview and the use of the information provided by the individual as outlined above? (Yes/No)

Note: Informed consent is necessary for all services, such as medical examination and procedure, health assessments, assisted voluntary returns and reintegration assistance.

1.5. If the individual is a minor, has the consent of the parent(s)/guardian(s) been obtained? (Yes/No)

Signature of interviewer: _____ Date: _____

Besides that, when data about human trafficking is acquired from victims, it is key to adopt protective measures in managing the data. IOM lists the most important ones:

- Personal data should be treated with care and confidentiality; any type of disclosures of personal data should be evaluated on a case by case basis, ensuring data security and with measures to control and monitor the access to data;
- Statistical analysis should be anonymous to avoid the possibility of tracing the individuals or groups of people; it is advisable to use aggregated data;
- It is recommended to share data strictly for a specific purpose, if the person related to the data has explicitly provided consent, and when adequate safeguards to protect the confidentiality of the data are ensured;
- Secure methods of transmission of data should be adopted: by applying encryption when using email, and limiting written communications to authorized persons on a "need to know" basis.

Finally, IOM alerts:

"Confidentiality and all disclosures should be governed by a confidentiality form. Trafficking data is highly sensitive because of the potential repercussion that could



result from unauthorized disclosure. Written consent should be obtained before the collection, use and disclosure of any data about a victim.”⁵

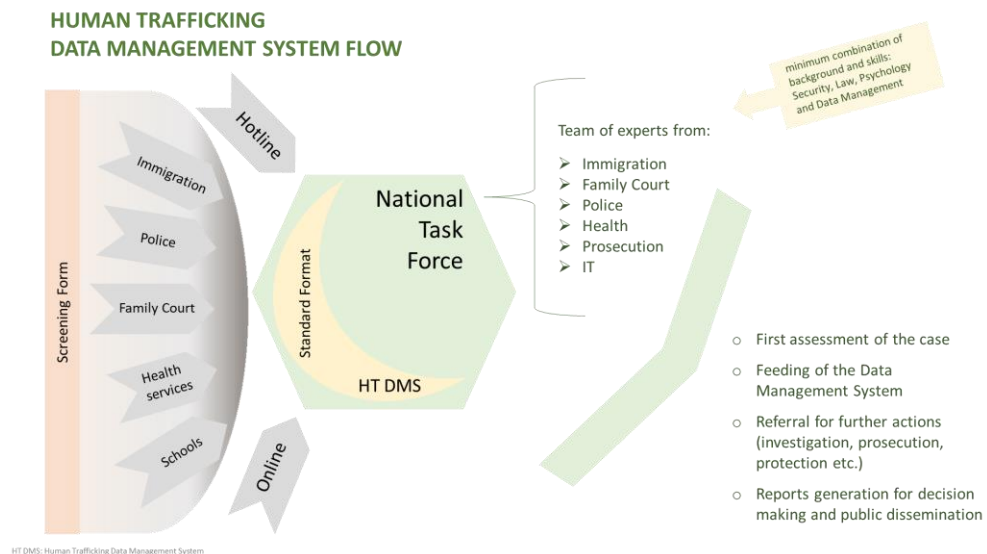
6) RECEIVING AND CHANNELING THE DATA

Information about human trafficking will come through different sources and in different formats. It is important to have well defined which type of data will be gathered and stored under the leadership of NTF to avoid wrong expectations in relation to the capacity and roles of the data management system.

The primary data collected and stored under NTF leadership will come through the Hotline phone number, the Online Form and the Screening Form. From those channels, the data collected will feed the **STANDARD FORMAT TO REGISTER INFORMATION ABOUT HUMAN TRAFFICKING SITUATION**.

The NTF team will run the reception of the data, its analysis, the referral decisions about the case, and the production of reports accordingly to the need for public policies, public budgeting, national and international dialogues, monitoring and evaluation of the national context, public information awareness and other purposes.

The graphic below presents it in a flow process:



⁵ Ibid.

7) ESSENTIAL ROLES AND FUNCTIONS FOR DATA MANAGEMENT

The adequate functioning of the human trafficking data management system requires human resources. Although it may vary depending on the context, in general the essential capacities to manage the data system are:

- i. A Data Management Leader as part of the NTF team. Among others that may be defined, he or she should be:
 - Leading the design and implementation of principles, policies, protocols and other institutional guidance needed to perform the tasks of the data definition, collect, analysis, reporting, exchanging, improving etc.;
 - Ensuring that the decision making about data management follows the principles and respects the mission and roles of the NTF and the entity members;
 - Preserving the principle of the protection of the victim's safety and best interest in all procedures related to the data management;
 - Leading the institutional relations and agreements building, as well as developing training activities, towards other stakeholders regarding data generation and management, with the support of experts and operational team members;
 - Reporting progress and challenges to the NTF, and ensuring the implementation of the decisions taken;
 - Supervising the services provided by other collaborators, both at strategic and operational roles, from internal employees to external service providers;
 - Requiring the support from experts or other collaborators when needed, bringing that need to the knowledge of the NTF, and implementing it according to the decisions taken.

- ii. A Data Manager as an operational role, under the supervision of the Data Management Leader. Among others that may be defined, he or she should be:
 - Implementing the routines of the data management, including that of receiving the information from the different sources (Hotline, Online, Screening Form) and proceeding to feed the database, accordingly to the protocols and rules defined by the Data Management Leader and approved by the NTF;
 - Keeping the Data Management Leader informed about the progress and challenges of the practices in data management and data exchange, by stakeholders, partners and members of the NTF;
 - Be accountable for ensuring that the data management procedures are followed, accordingly to the protocols and rules defined by the Data Management Leader and approved by the NTF;
 - Holding the measures to the effective control and protection of the data;
 - Generating data reports, accordingly to the orientation and requests by the Data Management Leader;
 - Acting and responding regarding any data management operations, under the leadership and supervision of the Data Management Leader;

IMPORTANT NOTE: It is highly advisable that the NTF be able to access technical support from an Information Technology (IT) expert. At the beginning, that support may be more demanding due to the initial phase of installing the data management system. It is expected that once installed the technological structure of the system, the assignment of human capacities to the system and the definition of its policies, protocols and rules, and the need for expertise support becomes less intense.

8) BASICS RULES AND PROCEDURES ON DATA MANAGEMENT

Based in general good practices in the data management, it is recommended:

- Memoranda of Understanding must be designed between NTF and other organizations to manage the exchanging of data, including in relation to the confidentiality, public declarations and conditions of use and quotation; all use of data by internal and external customers should be authorized by the NTF in a case-by-case basis, and personal data should not be publicly released;
- Projects and activities of other organizations that prove to be an important source for dataset will be assessed and analyzed by a data management expert, under request by NTF, in order to know whether the data is effectively suitable, credible and compatible; decisions on further collaboration will be made from that specialized assessment; in a positive case, a Memoranda of Understanding should be built, managing the sharing, use and join dissemination of the data;
- Qualitative and quantitative data need to be reviewed periodically (quarterly, for instance) in order to identify eventual improvement needs in terms of routines, procedures and activities;
- Mechanisms of validation and quality assurance of all data should be designed with the support by a data management expert in order to guide the design of policies and procedures for using, archiving and exchanging of data;
- As a principle, dataset will not be freely open to interested people or staff from organizations, agencies or institutions; procedures and controls should be established regarding the access to be given to data holdings, for all type of users and customers, including NTF members;
- The dataset will be documented accordingly to the metadata standards agreed among NTF, with the support of a data management expert; the expert will also produce the standard classifications and definitions to guide the data manager routine operations (about how to store and access the data);
- Periodically, the functioning of the data management should be monitored by the NTF in order to verify the consistency of the practices, challenges or eventual necessary updates.

ANNEX

Good to read

Extracted from: <https://www.ovcttac.gov/taskforceguide/eguide/3-operating-a-task-force/32-information-sharing/>

Information Sharing

Participation in a multidisciplinary task force does not mandate open and indiscriminate communication about investigations, suspects, victims, witnesses, tactical operations, or other sensitive information.

Finding a balance with information sharing and gathering can be a matter of contention among task force members.

It is not uncommon for survivors working with their attorneys to share details about their trafficking situation that may be relevant to the investigation, but they may not yet be ready to share this information with law enforcement. Similarly, law enforcement may be working actively on an operation that has the potential to affect victim service partners, but any level of disclosure about the operation may compromise the operation or place individuals in harm's way.

While sharing too much information can compromise victims and witnesses, agencies and organizations, cases and operations, and individual members, a failure to create a safe and effective information-sharing network is counterproductive to the formation of a task force.

A Balance of Protecting and Sharing Information

Efforts to keep the group informed and likewise gather and share information within the group is a core function of the task force. Efforts should be made to strike the needed balance of protecting and sharing case information (see next section on confidentiality). Common questions to address when clarifying expectations about information sharing may include:

- What type of lead time might a victim service provider expect prior to a raid being conducted?
- Is a victim service provider expected to contact law enforcement whenever a potential victim is referred for screening? Is law enforcement expected to contact a victim service provider each time a potential victim is interviewed?
- What information might a victim service provider need from law enforcement to prepare adequately prior to law enforcement action?
- When the victim service provider learns information relevant to the safety of the victim, do they inform law enforcement? If law enforcement learns information related to the safety of the victim, how much do they share with the victim service provider?
- What is the media policy for all task force members regarding a specific case?



- How will task force members communicate regarding data related to victim identification and prosecutions?
- In what forum will discussions about ongoing cases be held? Is there a committee dedicated to this? Are ad hoc meetings to address specific cases limited to those individuals working on the case? When do those meetings begin, how often will they be held at different stages of a case, and when will they cease?

Tips for Information Sharing

- Ensure clear communication among task force members about organizational confidentiality policies and procedures early in the process. This is crucial and helps to further clarify member roles and responsibilities.
- Establish a clear protocol for handling tips made to task force members. Identifying one point person to evaluate and disseminate this information can assist in maintaining confidentiality, protecting victim safety, and ensuring lack of duplication of work. For example, one task force funneled all tips through the USAO victim-witness coordinator, who sent out an e-mail with the identified potential trafficker's name to all Core Team members. Any member who had information on that individual met within the week to establish a lead agency and open an official task force case.
- Establish understanding and agreement about what type of information is appropriate for open sharing and what is not.
- Hold key information exchanges and discussions in task force meetings on topics that should be developed and vetted by the group, such as:
 - Human trafficking trends and developments in the region;
 - Debriefs of closed cases;
 - Issues concerning laws and resources to combat trafficking;
 - Suspicious behaviors or practices in the community for which there is not yet a response underway;
 - Lessons learned from successful or not so successful operations;
 - Ways to improve cooperation and collaboration;
 - Information provided by victims, clients, witnesses, or suspects that may serve as training materials;
 - Rumors that tend to divide or create barriers among the team;
 - Concerns expressed to individual members of the community to which the group may be able to offer a more comprehensive response;
 - Issues with the media including the use of victim names, photos, and information about current cases; and
 - Confidentiality agreements and whether to have task force members sign one.

Examples: How Some Task Forces Manage Information Sharing

Case logs: The Cook County Human Trafficking Task Force developed a [Human Trafficking Case Log](#) as a means to track, organize, and collaborate on cases worked by multiple law enforcement agencies on the Task Force.

Explaining need to know: The Western District of New York Task Force struggled in its early stages to strike the correct balance of information sharing related to potential law enforcement action. The NGO



partner was able to critically assess what specific information was imperative to readying itself for an appropriate response to victims in crisis. The NGO requested a general timeline (end of next week vs. an exact date or time), estimated number of victims, their gender and language, and whether or not any minors would be identified. When explained, it was easy for law enforcement to understand the need to pre-plan for shelter, language, and needs specific to minors. This sharing of information resulted in a less traumatic experience for survivors, thereby building trust from the beginning of the case and making the investigation move more smoothly.

Background checks: One task force requested that the victim service provider undergo a background check so that law enforcement would feel comfortable sharing sensitive case information with this individual.

END
April 2018

