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**SUBMISSION TO SPECIAL RAPPORTEUR ON TRAFFICKING IN PERSONS, ESPECIALLY WOMEN AND CHILDREN, MS. SIOBHÁN MULLALLY'S VISIT TO BANGLADESH FROM 31 OCTOBER TO 9 NOVEMBER 2022**

**ROLE OF IPROBONO AS PART OF THE CIVIL SOCIETY AND HUMAN RIGHTS DEFENDERS IN PROTECTING THE HUMAN RIGHTS OF VICTIMS. SURVIVORS OF TRAFFICKING IN PERSONS**

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iProbono<sup>1</sup> submits this document in response to the call for written submission issued by the UN Special Rapporteur on trafficking in persons, especially women and children, ahead of her official visit to Bangladesh from 31 October to 9 November 2022. This submission focuses on the role iProbono has been playing in protecting the human rights of the victims and survivors of trafficking in persons in Bangladesh. iProbono supports pro bono legal interventions for the prevention of trafficking and the protection of trafficked persons in Bangladesh in collaboration with its partner organizations.

**INTRODUCTION**

Human trafficking is a serious human rights concern in Bangladesh. Since Bangladesh became an independent country in 1971, the average number of human trafficking cases has increased every year. In recent times, the number has grown at an alarming rate with a substantial upsurge in the number of children and women trafficked from Bangladesh into India and other countries. A UNICEF report states that around 400 women and children are trafficked each month.<sup>2</sup> The

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<sup>1</sup> iProbono is a global organization founded in 2009 as a company limited by guarantee in the UK (a non-profit organization) and registered with the Charity Commission. iProbono's mission is to enable people to access their rights in pursuit of a just society by promoting active citizenship and engaging a holistic model to advance justice for all by representing people in need, to strengthen the impact of civil society, advocate for policies that promote social equity and end discrimination. iProbono has been working in Bangladesh since 2016.

<sup>2</sup> UNODC, *Interview with Professor Zakir Hossain: Human Trafficking in Bangladesh* (June 9, 2009), <https://www.unodc.org/unodc/en/frontpage/2009/June/human-trafficking-in-bangladesh.html>



reasons for human trafficking in Bangladesh and the elements leading to this recent noticeable increase are multifaceted, such as, economic backwardness and insolvency, lack of awareness, poverty, gender discrimination, migration, illiteracy, dowry system, natural disasters, and empowerment.<sup>3</sup> The U.S. Department of State's 2021 report<sup>4</sup> on 'Trafficking in Persons in Bangladesh' placed Bangladesh at Tier 2,<sup>5</sup> citing that Bangladesh does not fully meet the minimum standards for eliminating trafficking.<sup>6</sup> However, the report appreciated the government's significant and overall increase in efforts to curb trafficking as compared to the previous reporting period. The government of Bangladesh has taken several measures to counter human trafficking, e.g., the enactment of the Prevention and Suppression of Human Trafficking Act (PSHTA), 2012, and the Overseas Employment and Migration Act (OEMA), 2013, and the Rules framed under both the Acts, promulgation of a new National Plan of Action for Prevention and Suppression of Human Trafficking 2018-2022, formation of Trafficking in Human Being (THB) squad - a specialized section of the Organized Crime Unit of the Criminal Investigation Department (CID) of the Bangladesh Police - to carry out activities aimed at busting organized trafficking schemes. Bangladesh has also instituted anti-human trafficking tribunals in seven divisions across the country for speedy trial and adjudication of human trafficking cases, although the number of the tribunals is insufficient to meet the demands. Yet, Bangladesh remains vulnerable to the prevention and suppression of human trafficking.

### **iProbono: MISSION AND VISION**

[iProbono](#) is a legal organization with a global presence that provides holistic counsel with a strong, lean team that delivers strategic direction and execution, while also leveraging the expertise and commitment of a wide community of pro bono lawyers. iProbono's mission is to enable people to access their rights in pursuit of a just society. By promoting active citizenship and engaging a holistic model we advance justice for all by representing people in need, strengthen the impact of civil society, and advocate for policies that promote social equity and end discrimination. iProbono

iProbono operates worldwide, with principal activities in the United Kingdom, India, Nepal, Bangladesh, Pakistan and Sri Lanka. In Bangladesh, since 2014 iProbono has provided free comprehensive legal services to a number of beneficiary-led organisations that address pressing

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<sup>3</sup> UNICEF, ANALYSIS OF THE SITUATION OF CHILDREN AND WOMEN IN BANGLADESH (December 2015).

<sup>4</sup> THE U.S. DEPARTMENT OF STATE, TRAFFICKING IN PERSONS REPORT (Office to Monitor and Combat Trafficking in Persons, 2021).

<sup>5</sup> Tier 1 means fully compliant with the minimum standards for the elimination of severe forms of trafficking in persons, Tier 2 not fully compliant but making "significant efforts" to comply with the minimum standards and Tier 3 not fully compliant and not making "significant efforts" to be compliant with the minimum standards.

<sup>6</sup> 22 U.S.C § 7106, 1983.



social concerns like urban poverty, homelessness, sexual abuse etc. and represent the most vulnerable communities to secure their basic rights and entitlements.

## **iProbono's ROLE IN COMBATING TIP**

In terms of working in the sector of combating TIP, iProbono identified how the trainer of pro bono lawyers could benefit from clinical legal methodologies<sup>7</sup> as well as user-friendly audio-visual materials. As such, we collaborated with Winrock International and BNWLA as legal experts in the Ashshash Project. iProbono brought in specific expertise in terms of designing hands-on training to engage with victims and survivors of trafficking in persons. Whereas many of the trainee lawyers were experienced in working with the public prosecutors' office and dealing with TIP victims, yet their experience was also marked by the archaic legal system which is gender insensitive in a context where majority of human trafficking victims are women and girl children. iProbono decided to reorient their experiences with international legal standards, feminist jurisprudence and interactive clinical methodology. We drew upon Raoul Wallenberg (Lund) Guidelines<sup>8</sup> on engaging with victims of systemic human rights abuse, collected case studies from the field to design role playing simulation experiences<sup>9</sup> and revised training manuals to incorporate easy to understand, everyday use Bengali language format.

Below we give a detailed description of the Ashshash project and the specific contributions made by iProbono.

## **ASHSHASH PROJECT**

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<sup>7</sup> First originating in the USA as a social justice agenda to respond to the lack of legal services for the poor, clinical legal education (CLE) is an experiential learning process and pedagogy that teaches through interactive methods and promotes learning by doing. See, BABSEACLE, WHAT IS CLINICAL LEGAL EDUCATION, <<https://www.babseacle.org/clinical-legal-education/>>

<sup>8</sup> In June 2009, The International Bar Association's Human Rights Institute (IBAHRI) and the Raoul Wallenberg Institute at Lund University (RWI) jointly developed guidelines for fact-finding missions. The main purpose of these guidelines is to provide directives for various missions and bodies who engage in fact-finding investigations on human rights abuse. Primarily developed for the use by INGOs, these guidelines are useful for both individual and group fact finders to ensure that the fact-finding mission satisfies the objectivity, aim, transparency and standard of the investigation

<sup>9</sup> Simulation refers to "... immersive environments that use authentic contexts, activities and, possibly, assessment; they also involve mentoring and apprenticeships in communities of practice." Simulation provides a powerful pedagogy that allows students to have experiences on problems and contexts that mirror the real world. See, Caroline Strevens and Roger Welch, *Simulation and the Learning of the Law: Constructing and Using an Online Transactional Assessment in Employment Law*, in LEGAL EDUCATION: SIMULATION IN THEORY AND PRACTICE 47 (2014).



Winrock International (WI) launched the Ashshash Project to partner with public and private-sector service providers to deliver counselling, legal assistance and economic empowerment support to people who have survived human trafficking.<sup>10</sup> This collaboration is formed under the Projects's Major Activity n. 1.3.4 - Delivering pro-bono legal aid through local pro bono lawyers. As such, it aims to strengthen the capacity of prospective pro bono lawyers at the district level and establish a referral network at the regional level by providing technical support to prepare and deliver training on the legal framework of anti-human trafficking in Bangladesh.

iProbono is an implementation partner to the four-year project along with USAID Asia Counter Trafficking in Persons (Asia CTIP), Bangladesh National Women Lawyers' Association (BNWLA), and The Remedy Project (TRP).<sup>11</sup> Identification and capacity development of pro bono lawyers is a significant sub-activity under the Ashshash Project. Ashshash's implementing partner BNWLA developed a selection process through which 40 lawyers practicing pro bono legal support were chosen in Ashshash working district. They were trained on the PSHTA 2012 and OEMA 2013, including the Rules framed under both laws. The training equipped them with the capacity as well as positive mentality to provide legal services to the survivors of human trafficking. This capacity building program for pro bono lawyers included half yearly mentoring session and yearly refresher.

iProbono's engagement in the Ashshash Project spans three stages:

1. Vetting the training manual

iProbono developed the project from the early stages through sharing stakeholder perspectives on Bangladesh's legal and institutional frameworks on anti-human trafficking and migrant smuggling with the partners from WI, USAID Asia CTIP and TRP. Based on our inputs, TRP developed the training manual consisting of three modules. iProbono vetted the draft modules and case studies.

2. Delivering the training

iProbono worked with WI and BNWLA (the legal service delivery partner of the Ashshash project) to facilitate training programmes through identifying potential attendees and planning, designing and implementing the training programmes for the capacity development of pro bono lawyers. The training programmes happened in two stages: Capacity Building Training and the Refreshers'

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<sup>10</sup> Winrock International, PROVIDING HELP AND HOPE FOR THOSE WHO'VE COME HOME: SDC Bangladesh CTIP Ashshash <<https://winrock.org/project/providing-help-and-hope-for-those-who-ve-come-home/>>.

<sup>11</sup> *Id.*



Training. We trained 50 pro bono lawyers (10 from each district) over the course of six days. The training specifically focused on:

- The international and regional anti-trafficking legal frameworks as well as critical discussions on the national legal and institutional framework for anti-human trafficking and safe migration.
- Legal and psychosocial rehabilitation of the survivors and victims of TIP

iProbono's sessions focused on victim interviewing skills (working with vulnerable witnesses). Acknowledging the importance of using a victim-centric approach while dealing with vulnerable witnesses, iProbono referred to the Lund-London Guidelines to display the best practices for conducting victim interviews, which included:

- Building trust
- Empathetic listening and applying hearing filters
- Tackling conflicting statements by traumatised victims
- Interacting with unwilling victims
- Communication barriers (for example, cultural, gender, ethnic, prejudice, religious belief, professional distrust)
- Consolidating statements to prepare evidence and build a case theory

### 3. Refreshers' trainings:

During the half-yearly mentoring session in June and July 2022 in Jashore and Cox's Bazar, iProbono changed the original lecture format and instead conducted small group role-playing exercises with the trainee lawyers who posed as interviewers and interviewees to test their skills first-hand.

4. Engage in consultations at the national/divisional level on strengthening the legal support service for trafficking survivors

In the next stage, iProbono will collaborate with WI to develop a policy brief highlighting the challenges, scopes of development in national policies and legislations for countering human trafficking.

### **IMPACT:**

The training segment conducted by the iProbono team has been much appreciated by the trainee lawyers. Albeit being experienced litigators, the lawyers found the training an excellent opportunity to bridge the practice with the theory. The lawyers testified to its utility by stating

how the technical details helped them appreciate the clinical skills and psychosocial needs, which often are ignored due to resource constraints faced by practitioners in their everyday work.

## CHALLENGES IN REGULATING TRAFFICKING IN PERSONS

The impact created by the project must be evaluated in the wider sociolegal context of the legal system of Bangladesh. Appreciating the challenges of working with victims of TIP and prosecuting the trafficking cases shows how the ecosystem affects overall pro bono legal services in Bangladesh.

Bangladesh is one of the fastest-growing economies in the world.<sup>12</sup> In contrast, income equality has been soaring faster, making the rich richer and the poor poorer.<sup>13</sup> The recent COVID-19 pandemic and the Russia-Ukraine war have aggravated the overall economic inequality, unemployment and poverty.<sup>14</sup> Human instinct to demand and desire a better life with opportunities is natural, and everybody dreams of it. But marginalized and poor communities mostly fall prey to the trap of getting a better life set up by organized groups of criminals and travel thousands of kilometres using legal and illegal routes, subsequently locating them entrapped in the hands of human traffickers.<sup>15</sup> The government policies and strategies to address economic inequality, unemployment, and poverty are inadequate, resulting in the rising number of human trafficking victims yearly.<sup>16</sup>

Ideally, government, intergovernmental organizations, CSOs (Civil Society Organizations) and NGOs (Non Governmental Organizations) play a vital role in addressing the factors that increase vulnerability to trafficking, including inequality, poverty and all forms of discrimination. In Bangladesh, this holistic approach is impeded by many constraints and challenges such as undue government interference, control and mistrust towards CSOs and NGOs, and withholding approval for foreign funding to some NGOs.<sup>17</sup> Involvement and complicity of influential politicians, members of parliament (MPs), law enforcement officials and government officials in trafficking rings is also a serious concern posing challenges in combating trafficking. In 2021, a Kuwait court convicted a member of parliament, Mohammad Shahid Islam, on charges of human

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<sup>12</sup> The World Bank, *The World Bank In Bangladesh* (2022)

<https://www.worldbank.org/en/country/bangladesh/overview#1>

<sup>13</sup> Jehangir Hussain, *Growing income inequality in Bangladesh causes concern*, The Fin. Exp. (August 02, 2021).

<sup>14</sup> *id.*

<sup>15</sup> INTERNATIONAL ORGANIZATION FOR MIGRATION, *EXPLORATORY ASSESSMENT OF TRAFFICKING OF TRAFFICKING IN PERSONS IN THE CARIBBEAN REGION*, 17-18 (2010).

<sup>16</sup> ILO and Bangladesh UN Network on Migration, *Human Trafficking: Together, we can stop the scourge*, (June 11, 2020).

<sup>17</sup> Doreen Chowdhury, *The Problems of NGO Governance in Bangladesh*, Mod. Dipl. (June 19, 2022).

trafficking and money laundering.<sup>18</sup> These are the significant challenges and stumbling blocks in controlling human trafficking in Bangladesh.

At present, Bangladesh has abundant regulations to combat human trafficking, but lacks proper implementation. The enactment of the Prevention and Suppression of Human Trafficking Act 2012 (PSHTA) and the Prevention and Suppression of Human Trafficking Rules 2017 to combat domestic and international trafficking, carrying stringent punishments. There are certain complementary laws which apply along with PSHTA in relevant situations to punish the perpetrators for their involvement in human trafficking- the OEMA 2013, the Penal Code 1860, the Children's Act 2013 and the Prevention of Repression against Women and Children Act (PRWC) 2000 (as amended in 2003). For instance, if a female victim of human trafficking is sexually exploited or raped, charges are brought against the accused under the PSHTA 2012 and the PRWC Act 2000. The government has also undertaken the Nation Plan of Action for 2018-2022 to combat all forms of internal and international human trafficking. The five-year NPA plan focuses on building the administration's capacity, ensuring an economic and social safety net for victims and the vulnerable communities to human trafficking with special attention to children.

#### **CHALLENGES IN PROSECUTING CASES OF TRAFFICKING IN PERSONS**

Bangladesh's existing legal system, despite some amendments and reforms, largely remains a colonial and somewhat archaic mechanism. The procedural laws have complicated provisions, making the justice administration system complex, expensive and time-consuming. Moreover, the executive organs of the state do not have a sound coordination with the judicial and legislative organs. There is no coordination between prosecutors and investigators in the investigative process of human trafficking cases. To combat human trafficking efficiently and obtain the best results in prosecuting traffickers requires broad, multi-agency, flexible and cooperative strategies, domestically and internationally. If the law enforcement and prosecution agencies work together locally and across borders, it would be easy to prevent trafficking more proactively. But the legal and institutional structures of Bangladesh restrict effective coordination among various state, foreign and international agencies regarding information and intelligence sharing, as there is no system to work jointly, such as a joint human trafficking task force<sup>19</sup>.

The Police Officers investigating trafficking cases face many challenges - Investigators also face many challenges in investigating trafficking cases, e.g., the lack of cooperation from other state

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<sup>18</sup> *MP Papul jailed in Kuwait*, The D.S. (Jan 29, 2021).

<sup>19</sup> Joint Human Trafficking Task Force is an enhanced collaborative model task force that uses a multidisciplinary team of experts to combat human trafficking in a victim-centred way.



entities and other countries as it relates to information and intelligence sharing<sup>20</sup>, frequent staffing changes of investigators, and the red-tape barrier among state agencies.

The government does not provide prosecutors with offices for prosecutorial services, and they have insufficient logistical support. Prosecutors are provided with a desk inside the courtroom with no supporting staff and computers. Due to the absence of a full pledged office for the prosecutors, they cannot correctly prepare witnesses on the court dates the witness is called to testify. Despite having a heavy pile-up of cases, the government appoints only one prosecutor for each anti-human trafficking tribunal and pays a poor nominal remuneration. The prosecutors are selected based on political affiliations and Party loyalty on an ad-hoc basis, as Bangladesh does not have a full-time prosecution service. These shortcomings in the legal and institutional mechanisms severely impair the trial of anti-human trafficking cases resulting in abysmal conviction rates.<sup>21</sup>

## **CHALLENGES IN PROTECTING VICTIMS OF TRAFFICKING IN PERSONS**

Prosecution and successful conviction of the trafficking rings are an integral part of protecting the victims (present and future) and survivors. Unfortunately, much of the obstacles in protecting the victims are structural - emanating from executive, legislative and judicial challenges.

While the 2012 Act ordains special courts for prosecuting trafficking cases, till date Bangladesh does not have sufficient fast track courts to ensure prosecution with immediate effect. There are only seven Anti-Human trafficking tribunals in Bangladesh located at Dhaka, Chattagram, Rajshahi, Rangpur, Sylhet, Barishal and Khulna Districts. In other districts, Women and Child Repression Prevention Tribunals are empowered with subject matter jurisdiction to try human trafficking cases, which backtracks the trafficking prosecution.

Despite multiple legislatives and specialised agencies dedicated to supervising and control recruitment of overseas migrant workers, Bangladesh has been unsuccessful in curbing the operations of fraudulent travel agencies. Till date, BAIRA (Bangladesh Association for International Recruitment Agencies) has no wholesome database of credible recruitment agencies.

The trafficking routes are known to the agencies, but the routes are not properly monitored to stop trafficking and smugglings en route. The border security forces need to enhance their monitoring and cross-border cooperation. A lax enforcement of border control and

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<sup>20</sup> Shariful Islam, *Human Trafficking: Families' wait for justice gets longer*, The D.S. (Sept. 5, 2021).

<sup>21</sup> BRAC, HUMAN TRAFFICKING AND OUR FAILURES: IS THERE A WAY OUT? <https://www.brac.net/program/human-trafficking-and-our-failures-is-there-a-way-out/> (2015)





documentation contributes to the unlawful entering and exiting of agents, moreover this sometimes doubly victimises the victims of trafficking by prosecuting them as illegal foreigners.<sup>22</sup>

Lack of legal awareness is another major challenge. The income inequality is striking despite Bangladesh's PCI (per capita income) steadily increasing over the last few decades. The economic desperation still makes overseas employment alluring to people despite every village having witnessed trafficking cases. Often, due to not knowing about the trafficking indicators, the potential victims cannot identify danger until it is too late. The training of the lawfully recruited migrant workers is ineffective and sub-standard. The language training received as part of their pre-departure orientation is minimal, therefore the victims often have no understanding of the interactions they have with their overseas agents and employers - they can neither communicate with the law enforcement agencies in the country of destination, nor can they give helpful testimony that can be used as evidence of abuse.

Lack of specialised service centres (such as the OCC- Onestop Crisis Centre for sexual assault and gender-based violence victims) affect the psycho-social wellbeing of rescued survivors, which later affect their capacity and willingness to participate in the prosecution. The number of cases actually reported to the police are significantly low in proportion to the number of the rescued victims. Similarly, the number of missing girl reports are lower than the actual number, which is a result of social stigma.<sup>23</sup>

From an international law perspective, Bangladesh has not yet ratified the UN Protocol against Smuggling of Migrants. This affects the cooperation among States Parties to uphold the rights of migrants.

## **PRO BONO LEGAL SERVICE PROVIDERS IN BANGLADESH: CHALLENGES AND BEST PRACTICES**

As seen above, the legal ecosystem within which iProbono works is defined by colonial governmentality, archaic procedural structures, and a serious lack of resources. Given the limitations and challenges the Government faces, it is crucial for non-governmental organizations (NGOs) and civil society organizations (CSOs) to supplement the efforts. Bangladesh has a strong pro bono presence when it comes to assisting the victims of TIP. Lack of appreciation of psychosocial needs, widespread prejudice against the poor, and deep-rooted misogyny targeted at the female victims of TIP - women who wanted to be independent and then returned abused-

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<sup>22</sup> Arpeeta Shams Mizan, *Released Prisoners-Analyzing the Legislative Gaps in the Detention Scheme of the Foreigners in Bangladesh*, (NHRC-BD, 2014).

<sup>23</sup> ASIAN DEVELOPMENT BANK, *COMBATING TRAFFICKING OF WOMEN AND CHILDREN IN SOUTH ASIA, COUNTRY PAPER: BANGLADESH* (2002).



add to the challenges of pro bono legal professionals, since they not only have to complement and supplement the weak legal infrastructure but also fight against these sociocultural barriers.

The biggest challenge, however, comes in the form of pro bono requirements set by the Bangladesh Bar Council for licensed advocates - there is none. Delivering pro bono service is not mandatory nor any prerequisite for obtaining or maintaining the bar licence. This structure has considerably affected the mindset of the lawyers, where many think pro bono is a waste of time unless the money comes in some form. Most urban law firms with considerable resources do not offer pro bono services to TIP cases. It ultimately comes down to human rights NGOs and CSOs to work through donor-based funded projects to deliver the much-needed support. Accordingly, the donor conditions shape much of the NGO/ CSO project goals and activities.

Within this set structure, collaboration and connection at the grassroots level is paramount. A particular challenge for pro bono organizations is to find enough financial resources to build sustainable structures and networks that can work towards long-term achievements. After each training of the Ashshash Project, iProbono was approached by the trainees for future assurance of financial resources and continued logistical support. iProbono does not have any branch offices in Bangladesh, therefore, our partner organization BNWLA proved to be vital in maintaining these working relationships. Lawyers in various parts of Bangladesh work closely with the prosecutors' offices and with various NGOs and CSOs to provide legal services to the victims. These lawyers are engaged in various stages of the process- ranging from investigation and case building to coordinating with the concerned NGO/CSOs to ensure the victims' rehabilitation.

In addition to securing prosecution and conviction, rehabilitation and reintegration of trafficked victims into society is equally crucial. The government faces some significant challenges in this sector, including but not limited to resource limitations, lack of social support in reintegration into the families and the communities due to common social stigmas, and lack of interagency cooperation to coordinate activities of the governmental agencies in rehabilitation and reintegration.

It is essential to provide counselling, monetary help, shelter, protection and other aid to human trafficking victims both during and after the trial. However, the government has been unable to do so adequately. However, NGOs have been filling this gap by facilitating essential counseling support to the survivors and linking them to skills and entrepreneurship development training,



legal, shelter and healthcare support in coordination with government agencies on a pro-bono basis.<sup>24</sup>

## CONCLUSION AND RECOMMENDATIONS

Bangladesh has made notable advancements in enacting laws and policies to combat human trafficking. But, the application and implementation of the laws and policies is abysmal and frustrating. More so, legislation alone cannot counter-trafficking without concerted efforts of government, CSOs and NGOs. The government should consider the following recommendations and adopt a holistic approach to counter trafficking in persons effectively.

- Establish a full-time prosecution service to strengthen the prosecutorial expertise to provide better representation in court when prosecuting human trafficking cases on behalf of the state.
- Establish at least one anti-human trafficking tribunal in every district for speedy disposal of cases.
- Constitute a joint Human Trafficking Task Force comprising a multidisciplinary team of experts to combat human trafficking swiftly and efficiently.
- Legislate for gender-sensitive and child-friendly approaches in the investigation and trial of trafficking cases.
- Formulate effective policies for interagency collaboration.
- Formulate an effective and culturally appropriate Witnesses Protection scheme that covers TIP cases.

For Pro Bono legal interventions:

- Set a minimum bar for pro bono hours to be completed by licenced advocates as a condition for their bar licence maintenance and renewal.
- Acknowledge the shrinking civil space so that partnership and collaboration among government, civil society, the private sector, and trafficking survivors to end trafficking in persons can increase effectively without compromising political mandates.
- Build social resilience and foster legal and social awareness to the poor and marginalised community to prevent human trafficking by increased investment on legal awareness programmes. These can include the Street Law formats which have been hugely successful in South Africa.

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<sup>24</sup> iProbono, *Combating Trafficking In Persons in Bangladesh* (May 2022), <https://i-probono.com/case-study/combating-trafficking-in-persons-in-bangladesh/>