



## The Question of Human Trafficking: A Comparative Analysis of Singapore and India's Adoption of the UN TIP Protocol

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### **Abstract**

Human trafficking remains one of the major problems in today's world, with Southeast Asia being a significantly large hub for such crimes. Singapore, a developed country and a previously notorious transit hub, has put in place strict measures, which include the Prevention of Human Trafficking Act of 2015 that imposes stiff penalties on traffickers, including imprisonment and fines, to prevent trafficking-related offenses in the country. This has led to a successful campaign against trafficking and a consequent considerable decrease in cases within the country. Meanwhile, India faces a larger-scale problem, with trafficking being deeply entrenched in socio-economic disparities. The Trafficking of Persons Prevention, Protection, and Rehabilitation Bill, 2018, is considered to be India's big ticket legislation against trafficking. Yet, the act contains vagueness and regressive components. Together with remaining challenges in enforcement and victim protection, trafficking pervades the country. This paper will conduct an in-depth review of human trafficking in Singapore and India, focusing on a comparison of respective laws and overall situations. This paper also examines the unintended consequences of some provisions in India's Bill, 2018, such as immunity clauses that could discourage victims coming forward in cases of trafficking. The paper concludes with realistic and implementable recommendations for improving enforcement, victim support, and international cooperation to further combat human trafficking, backed by a significant research review.

**Keywords:** *Human Trafficking; Southeast Asia, Singapore; India; UN TIP Protocol*

### **Introduction**

Out of the immeasurable number of crimes committed across the world, human trafficking stands as one of the most heinous. This crime has existed since time immemorial and continues to plague modern society, despite the improvements in jurisprudence and international efforts to deal with it. The most vulnerable people are the ones targeted by human trafficking, exploiting them for labor, sexual

services, and even marriage, through a web of coercion, deception, and force. What makes it particularly insidious is its scale and hidden nature, which leaves millions trapped in situations of exploitation.

According to a 2016 inspection by the International Labour Organisation, an estimated 40.3 million people globally are victims of human trafficking, with 24.9 million coerced into labour and an additional 15.4 million compelled into marriage (*Global Estimates of Modern Slavery*, 2022). Remarkably, this translates to almost 5.4 victims per 1,000 individuals around the world, a figure that illustrates the magnitude of the issue at hand.

The effects of human trafficking extend beyond the violation of individual rights. It causes severe physical and psychological harm to victims and disrupts the social and economic fabric of societies. Trafficking distorts labor markets, undermines legitimate businesses, and hampers economic growth by perpetuating an illicit trade that thrives on exploitation.

Recognising the difference between human trafficking and aggravated trafficking becomes essential. Human trafficking is the practice of exploiting other parties via recruitment, transportation, harboring, or receipt, using methods such as threats, coercion, fraud, or deception. Aggravated trafficking, on the other hand, includes more severe forms of exploitation and circumstances that exacerbate the victim's suffering, such as trafficking minors, causing serious physical or psychological harm, or exploiting the vulnerability of people for activities like enslavement or sexual exploitation. India and Singapore both acknowledge these differences in their legal systems, imposing stricter penalties for aggravated trafficking offenses.

The UN TIP protocol constitutes an element of the United Nations Convention against Transnational Organised Crime (UNODC). The primary objective of the protocol is to safeguard and assist human trafficking victims, notably women and children, with the aim to increase the solidarity among the existing States Parties. Resolution 55/25 of the General Assembly adopted the Protocol on November 15, 2000, and it became effective on December 25, 2003.

The impact of UN TIP has been substantial. Around 172 countries have henceforth enacted legislation criminalizing human trafficking, in line with the UN TIP. With over 63% of countries having developed National Action Plans to combat human trafficking. 2018 onwards the convictions have increased from a few hundred in 2003 to 9000 annually. Prosecution rates have also increased globally, as a result of better surveillance and detection of trafficking crimes. Victim identification has also improved, with approximately 100,000 victims identified and assisted annually.

Southeast Asia in particular has become a significant region in relation to human trafficking, with organised crime rings generating close to \$3 trillion in illicit revenue annually. With over 62% of all those being trafficked globally being trafficked both inside and beyond the region, it has been recognised as an essential centre for human trafficking (UNODC, "Global Report on Trafficking in Persons 2020"). Additionally, a substantial number of the 9.2 million individuals in the Asia-Pacific area who are victims of modern slavery have been trafficked (International Labour Organisation, "Global Estimates of Modern Slavery 2017"). 200,000 women and children are trafficked from SEA each year, making the situation especially hazardous for them (International Labour Organisation, "Global Estimates of Modern Slavery 2017").

Singapore and India are two especially key players in the Southeast Asian Human trafficking situation and pose an interesting comparison of trafficking rates, responsive measures, and imposed laws and regulations.

The critical role of UN TIP was recognized when Singapore reported the incidence of various men being charged with sexual assault with an underage girl. This incident was one of many wherein the girl's family was buried in debt due to the father's hospital expenses. False promises of employment led to her being forced into prostitution. It's been noted that sex trafficking victims report a similar case through the shores of Singapore. Brought in from Thailand, Philippines, Sri Lanka, China and India, they are tempted with promises of employment and good future, and subsequently end up with their passport seized, travel documents confiscated (*NewspaperSG - The Straits Times, 31 January 2012*). There has been evidence suggesting that for trafficking women and children into Singapore, there might be organised crime groups operating. With various accounts of foreign women and young girls being held captive in "forest brothels" which are located on public lands surrounding dormitories for migrant workers (Wong, 2014).

India, an enormous and diverse nation with severe socioeconomic divides, is nonetheless a source, destination, and transit area of individuals who are trafficked. Because of poverty, a lack of education, and a lack of work prospects, it has a high incidence of trafficking instances. The number of recorded cases in India continues to rise despite the country's numerous comprehensive laws, such as the Trafficking of Persons Bill (2018), which attempts to address a variety of issues and types of human trafficking. The measure calls for the creation of rehabilitation committees and anti-trafficking sections at the district, state, and federal levels of government. 6036 victims of human trafficking were reported in 2022, out of 2,250 incidents documented nationwide. This is a stark decrease from the 8,132 incidents of human trafficking reported in India in 2016 (NCRB).

95% of people who are trafficked in India wind up being coerced into prostitution, according to Divya (2020). According to Munshi (2020), the NCRB additionally demonstrated that the sex trade is the most prevalent form of human trafficking in India, accounting for 6,616 recorded cases.

On the one hand, due to its advantageous position and advanced economy, Singapore is a major transit and destination country for people who are trafficked. To repel such illegal activity from occurring in the country, Singapore has ensured that strong legal measures are in place to combat trafficking, such as the Prevention of Human Trafficking Act (PHTA) of 2015. The PHTA consists of strict laws and regulations, severe penalties for offenders, as well as rehabilitation services and safety measures for victims. The PHTA has proved effective, as, since its introduction in 2015, there have been only 11 prosecuted human trafficking cases, with 8 related to sex trafficking and 3 related to labor trafficking. Singapore also has an excellent surveillance system in place, with the Singapore Police Force (SPF) and Ministry of Manpower (MOM) conducting regular operations to detect potential trafficking cases in the country.

The present study has employed significant review of existing literature and legal reforms brought up in India and Singapore, to differentiate between the two legislations, the rigidity of their legal procedures and enforcements. It also aims to identify the weaknesses in India's legal framework regarding human trafficking as compared to Singapore's as a result of in-depth analysis and propose realistic improvements that can be made by the respective authorities in both countries, in order to reduce the number of human trafficking crimes, as well as to improve the countries' surveillance and identification system, in order for fewer such crimes to go undetected.

## **Singapore's Compliance with the UN TIP Protocol**

Singapore has provided evident compliance with the protocol, as a result of its improved legislation, enforcement, and surveillance, in regards to human trafficking, in recent years. Its imposition of the PHTA in 2015 criminalized human trafficking; provided severe penalties, including imprisonment,

fining, and caning for offenders (Singapore Ministry of Law). The PHTA also ensures provision of assistance and protection to victims, including shelter, medical care, and legal aid.

In 2016, Singapore saw its first conviction under the Prevention of Human Trafficking Act (PHTA). A 25-year-old student was sentenced to 6 months' jail and a fine of \$30,000 for recruiting two foreign women for sexual exploitation. The authorities in 2022 initiated around 25 trafficking investigations, with twenty for sex trafficking and five investigations focusing on labour trafficking. However the country has been performing poorly when it comes to prosecuting any traffickers under the PHTA. However, they did initiate prosecutions for around four sex traffickers under provisions by different laws (2023 Trafficking in Persons Report: Singapore, U.S. Department of State).

Even with the prevalence of sex and labour trafficking victims reports being provided by various NGOs and embassies in Singapore, the documented and investigated cases continue to remain considerably low. For instance, in 2011, NGOs and foreign embassies reported 146 cases of human trafficking whereas the Singapore government only provided accounts for 81 cases. Singapore was moved from Tier Two to Tier Two Watchlist by the US Department of State's TIP report of 2011. It was following this that the government of Singapore established a taskforce to tackle this problem, and it was called the Inter Agency Task Force on TIP (Wong, 2014).

Singapore has implemented several acts and bills to combat the ever-growing complexity that is associated with human trafficking. Through several renditions, they have been able to make a substantial difference in the abundance of trafficking-related crimes.

The progression of Singapore's legal framework to combat human trafficking can be seen through the implementation of various measures and legislation, starting with the establishment of the Inter-Agency Taskforce on Trafficking in Persons in 2010. This marked the government's serious commitment to tackling human trafficking by creating a national task force focused on prevention, protection, and prosecution. While no specific fines or penalties were linked to this establishment, it laid the groundwork for a more comprehensive legal framework.

In 2015, Singapore passed the Prevention of Human Trafficking Act (PHTA), which criminalized all forms of human trafficking. This act introduced strict penalties for traffickers, including fines of up to SGD 100,000, imprisonment for up to 10 years, and mandatory caning. Between 2015 and 2019, 11 cases of human trafficking were prosecuted under this act, reflecting Singapore's strong legal stance against trafficking (Singapore Legal Advice, 2020; UNODC, 2020).

Following this, Singapore ratified the ASEAN Convention Against Trafficking in Persons, Especially Women and Children (ACTIP) in 2016. This further strengthened regional cooperation and aligned Singapore's domestic laws with international standards, enhancing fines and penalties under existing legislation. The ratification of this convention reinforced Singapore's commitment to the ongoing prosecution of offenders and the support of trafficking victims (ASEAN, 2016).

By 2023, Singapore continued its implementation of anti-trafficking measures, aiming to further strengthen victim protection, increase prosecutions, and prevent trafficking crimes. The legal framework saw enhanced penalties for traffickers, and the number of prosecuted cases increased slightly, with 13 cases prosecuted between 2020 and 2023 (Singapore Inter-Agency Taskforce, 2023). This reflects the country's ongoing commitment to combating human trafficking, supported by its well-developed surveillance and enforcement mechanisms.

Table 1 shows the evolution of the Singaporean legislation, key provisions, fines and penalties, and the number of reported human trafficking cases.

<b>Year</b>	<b>Legislation</b>	<b>Key Provisions</b>	<b>Fines and Penalties</b>	<b>Human trafficking cases (Reported)</b>	<b>Citation</b>
2010	Establishment of the Inter-Agency Taskforce on Trafficking in Persons	Formation of a national taskforce to combat trafficking through prevention, protection, and prosecution	N/A	N/A	Singapore MOM, 2024
2015	Prevention of Human Trafficking Act (PHTA)	Comprehensive legislation criminalizing all forms of trafficking; severe penalties for traffickers	Fines up to SGD 100,000 and imprisonment up to 10 years, with mandatory caning	11 cases prosecuted (2015-2019)	Singapore Legal Advice, 2020; UNODC, 2020
2016	Ratification of the ASEAN Convention Against Trafficking in Persons, Especially Women and Children (ACTIP)	Strengthened regional cooperation and alignment with international standards	Enhanced fines and penalties under existing laws	Continuation of prosecution and enhanced victim support	MHA, 2016
2023	Continued Implementation	Ongoing efforts to strengthen victim protection, increase prosecutions, and prevent trafficking	Enhanced fines and penalties under existing laws	13 cases prosecuted (2020-2023)	Singapore Inter-Agency Taskforce, 2023

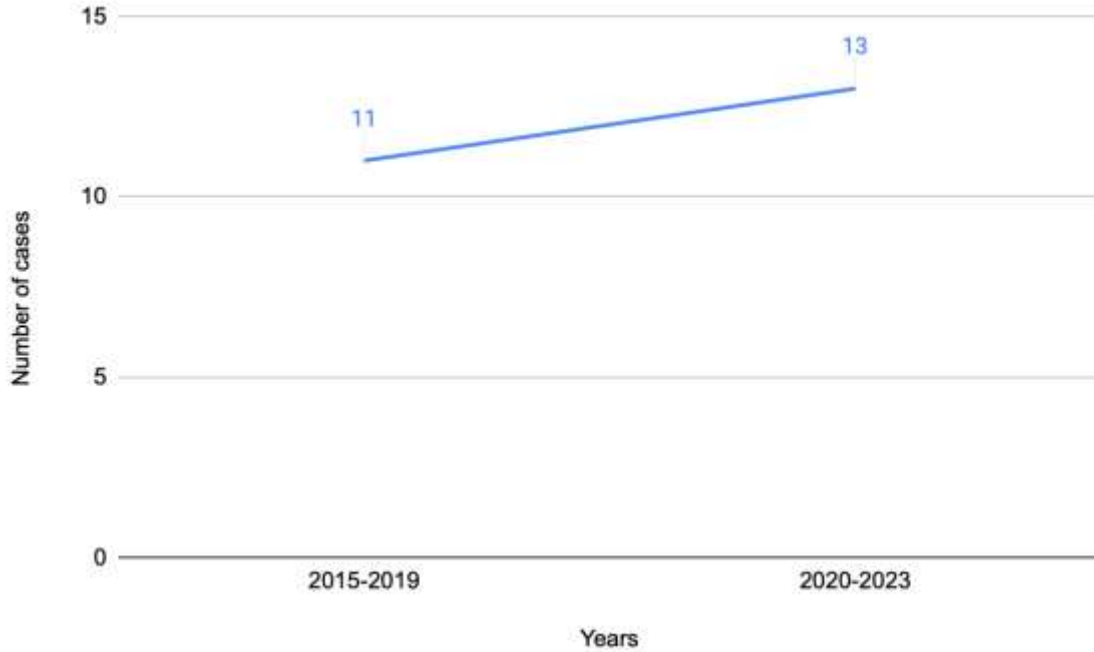


Figure 1 shows the chronological progression of prosecuted human trafficking cases in Singapore (Singapore - United States Department of State, n.d.)

The line graph in Figure 2 showcases the chronological progression in the prosecuted human trafficking cases in the country of Singapore between 2015-19 and 2020-23. The country reports an upward trend in the cases which indicates small increase in legal action against human trafficking cases over the time period.

### India's Compliance with the UN TIP Protocol

In May 2006, after India had been downgraded from Tier Two to the Tier Two Watch List, the Trafficking in Persons report issued by the US State Department, a Swedish pattern of amendment was introduced to deal with customers of trafficked sex workers (*How Did We Get Here?* 2018).

Significant efforts have also been made by India to enforce laws that comply with the UN TIP Protocol. The Trafficking of Persons (Prevention, Protection, and Rehabilitation) Bill, 2018 is a prime instance of this. It establishes harsh punishments on traffickers and has devices for the prevention, rescue, and rehabilitation of victims. In addition, the Bill has ensured a fall in reported cases and a corresponding rise in the conviction rate of criminals, demonstrating an overall decrease in crime related to human trafficking and an increase in enforcement.

To boost the implementation of anti-trafficking laws, India additionally established Anti-Human Trafficking Units (AHTUs) in several states in compliance with the UN TIP Protocol. Both victim protection and criminal prosecution are under the authority of the units. Furthermore, India has made substantial investments in victim rehabilitation by building protection and rehabilitation homes and providing an array of support services, such as representation in court and vocational education.



Human Trafficking accounts by IJM report the case of Sharmila who was trafficking into West Bengal, India and suffered through the brutality of sex trafficking. The global report on human trafficking from the United Nation Office on Drugs and Crime (UNODC) reveals that 79% of trafficking occurs for the purpose of sexual exploitation. Forced labour continues to remain one of the most predominantly less frequently reported forms of trafficking (IJM, 2025).

In fact, according to the NCRB, there were 2,250 reported cases of human trafficking in India in 2022, however a mere fraction of those cases resulted in prosecution or conviction. 1,758 were charge-sheeted, but only 107 convictions were secured, illustrating the inefficacy of India's prosecution system. Hence, trafficking crimes often go unpunished in India.

India has implemented several acts and bills to combat the ever-growing complexity that is associated with human trafficking. Through several renditions, they have been able to make a substantial difference in the abundance of trafficking-related crimes.

### **Immoral Traffic Prevention Act (ITPA) 1956**

ITPA marks the first significant legislation imposed by the Indian authorities to help combat the problem of human trafficking, specifically sex trafficking. The act imposed fines of up to Rs 2000 and imprisonment up to 1 year, for offenders. At this stage, comprehensive data on reported human trafficking cases was not available.

### **Criminal Law (Amendment) Act, 2013**

The Criminal Law (Amendment) Act marked a significant shift in India's legal approach to handling human trafficking cases. Stricter penalties were introduced, with fines upto Rs 1,00,000 and imprisonment up to ten years. It expanded the definition of trafficking to include forced labour and organ trade. Following these changes, there were 5,466 reported cases of human trafficking of human trafficking in 2014 (NCRB, 2014). The legislation aimed to embody modernity as it grappled with the ever-growing complexity of human trafficking. Additionally, it ensured greater comprehensive protection for victims.

### **Trafficking of Persons (Prevention, Protection, and Rehabilitation) Bill, 2018**

This bill offers significant updates to the previous legislations on human trafficking. Designed specifically to prevent trafficking, provide protection to the victims and ensure their rehabilitation, this bill is comprehensive in nature and tackles the problem of trafficking by imposing severe penalties on the perpetrators. Before the implementation of the bill, in 2016, there were 8,132 reported cases of human trafficking in the country. The bill therefore aimed to combat this spike, and to significantly reduce levels of human trafficking crimes in the country. It proved successful, as it saw a decrease in cases to 6,616 in 2019. However, this could also be a result of the perverse nature of certain aspects of the bill, in particular, the legislation for granting human trafficking victims' immunity. The Bill provides immunity to a victim if they commit an offence punishable with imprisonment of more than ten years and not for lesser offences. Hence, many victims who have been coerced into committing crimes, may be discouraged from coming forward as they may face severe legal repercussions. This could have caused/contributed to the decrease in reported cases.

This particular viewpoint and insight is matched by the Oxford Human Rights Hub, with their exact thoughts being "Another concern is that while the Bill provides immunity to victims for crimes committed under coercion or threat of death or grievous injury by the trafficker, the immunity extends to only those crimes that are punishable with imprisonment of 10 years or more, or death. Thus, immunity

cannot be claimed for petty offenses even though committed under coercion by the trafficker.” (Oxford Human Rights Hub, *n.d.*)

Table 2 shows the evolution of the Indian legislation, key provisions, fines and penalties, and the number of reported human trafficking cases.

Year	Legislation	Key Provisions	Fines and Penalties	Human Trafficking Cases Reported	Citation
1956	Immoral Traffic (Prevention) Act, 1956: initially called the Suppression of Immoral Traffic in Women and Girls Act, 1956 (SITA)	Initial framework for combatting human trafficking, with an emphasis on preventing trafficking for sexual exploitation. The framework was primarily created to prevent prostitution in public spaces.	Fines upto Rs 2000 and imprisonment upto 1 year	N/A	Lok Sabha, 1956
1986	Amendments to the Immoral Traffic (Prevention) Act, 1986	Enhanced penalties and broadened scope to include more severe forms of trafficking. The umbrella of trafficking had become more complex and nuanced, and hence a similarly nuanced act was required and consequently introduced.	Fines upto Rs 10,000 and imprisonment upto 5 years	N/A(1987)	Lok Sabha, 1987
2013	Criminal Law (Amendment) Act, 2013	Enhanced penalties and broadened scope to include more severe forms of trafficking	Fines upto Rs 1,00,000 and imprisonment upto 10 years	5,466 (2014)	NCRB, 2014
2018	Trafficking of	Comprehensive	Fines up to Rs	6616 (2019)	NCRB, 2019



	Persons (Prevention, Protection, and Rehabilitation) Bill, 2018	framework including prevention, rescue, rehabilitation, and severe penalties for all forms of trafficking	2,00,000 and imprisonment up to life		
2022	Current Status	Continued efforts with existing legal frameworks, enhanced victim support, and international cooperation	Enhanced fines and penalties under existing laws	2,250 (2023)	NCRB, 2023

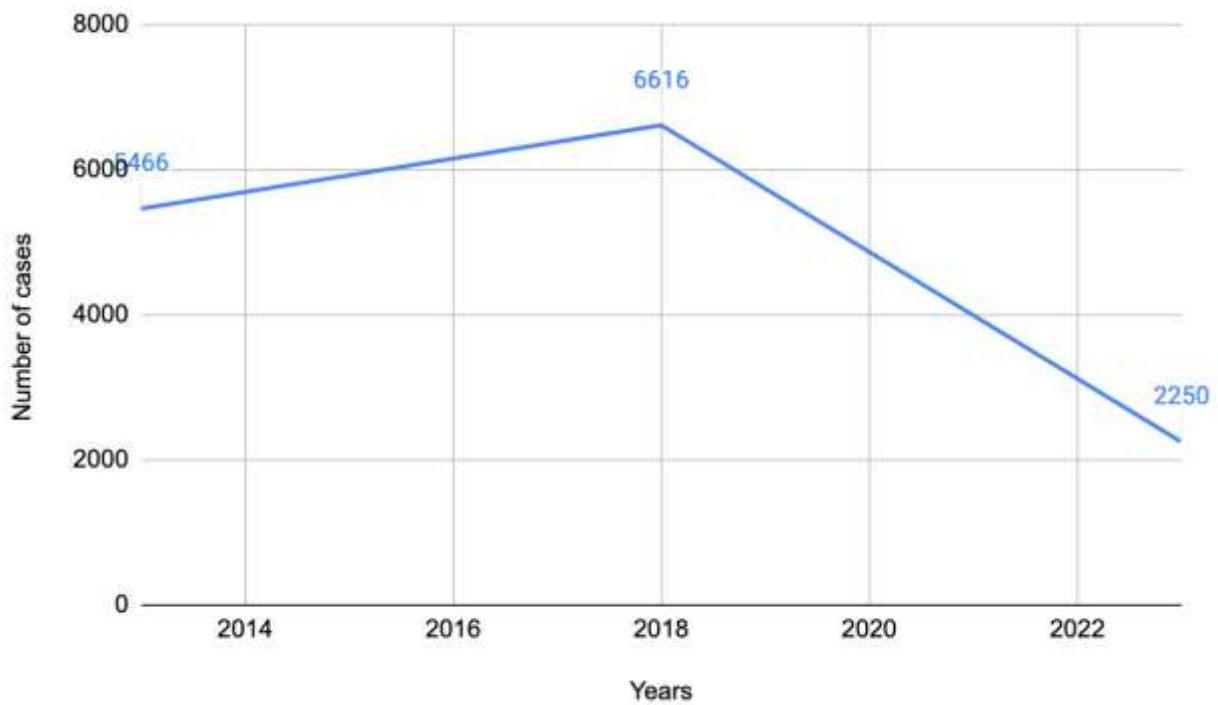


Figure 2 shows the chronological progression of human trafficking cases in India

The line graph in Figure 1 illustrates the progression of human trafficking cases within India from the year 2014 till 2022. According to the graph, 2014 reported 5,466 cases of human trafficking, with there being an increase in 2018 at 6,616 reported cases. By the year 2022, the number of human trafficking cases had declined tremendously to 2,250.

### Discussion

Human trafficking is a concept that can't be confined to rules, regulations and arbitrary data. The inhumane practice strips individuals of their freedom and potentially their sanity. As a result, mental and psychological issues arise, including PTSD, anxiety, depression and suicidal ideation.

Okech et al. (2018) found high rates of PTSD among human trafficking survivors, along with symptoms of anxiety, depression, and suicidal ideation. Findings reported the PTSD prevalence of 32% among female trafficking survivors while a cross-national study reported 44% of survivors displayed PTSD symptoms in post-trafficking settings. Sleep disturbances, aggression, and self-harm are common, reflecting the deep psychological scars left by prolonged exploitation. Trafficking survivors often experience a cycle of severe abuse and control, resulting in complex trauma that persists long after they've exited trafficking conditions. Their trauma does not end at rescue; reintegration into society is frequently hampered by mental health challenges that were either triggered or intensified by their trafficking experience. Social support is shown to reduce PTSD symptoms, but the benefits vary depending on survivors' reintegration ease and coping mechanisms. This suggests that post-trafficking recovery isn't solely about rescue and legal intervention but requires a robust support network and reintegration support that many communities currently lack.

Dakua et al. (2023) examined the spatial and temporal patterns of human trafficking in India, highlighting demographic, geographic, and socio-economic influences on trafficking trends. Human trafficking, a fast-growing transnational crime, affects around 25 million people globally, with India reporting approximately 7,000 cases by 2021. Using police records from Indiatat and location quotient mapping, the study identifies forced labor (43%) and sexual exploitation (33%) as primary drivers. Notably, regions like Rajasthan, West Bengal, and Maharashtra exhibit high trafficking incidences, with Rajasthan recording the highest number of male victims, and Maharashtra, female victims.

The study finds a persistent gender disparity, with females 30% more likely to be trafficked than males. Geographic areas with higher poverty levels, climate vulnerability, and economic instability face increased trafficking risks. Trafficking dropped in 2020 during the COVID-19 lockdown, showing how mobility restrictions reduce trafficking risk. Regions such as Goa, Delhi, and Odisha show the highest concentration of trafficking victims by population density. Rescue rates vary, with Rajasthan, Maharashtra, and Odisha reporting higher rescues, while some states lack adequate anti-trafficking units, underscoring infrastructure deficiencies.

Table 3 shows the regional discrepancies for human trafficking in India

STATE	2018	2019	2020	2021	2022
Maharashtra	311	282	184	320	233
Telangana	226	220	184	347	220
Assam	262	201	203	203	203
Odisha	103	102	95	108	120
West Bengal	92	83	64	78	85

\*(NCRB, 2019-2023)

Females are 30% more likely to be trafficked than males. In Rajasthan, 80.8% of victims are male, while in Maharashtra, 94% of victims are female, highlighting regional gender differences. Goa has the highest trafficking concentration with a Location Quotient (LQ) of 8.18, where LQ is a comparative tool used to decipher the prevalence of an issue in a specific area / state as compared to in a country. Other states with high trafficking concentrations include Delhi, Odisha, Assam, Mizoram, and West Bengal. These regions of lower literacy are less knowledgeable about trafficking and hence are more likely to fall into debt bondage traps and other kinds of disillusioned forms of trafficking. Odisha and Assam often see more trafficking as vulnerable populations, including women and children are more susceptible to exploitation. Highly urbanized states, like Maharashtra, attract both internal and cross-border migration, resulting in a higher influx of immigrants. Hence, traffickers often exploit the influx of migrants searching for work, leading to higher reported trafficking cases in these regions. Trafficking cases saw a notable decrease during the 2020 lockdown due to restricted human mobility. In states like Rajasthan, 93.8% of victims are adults, while states like West Bengal see a higher incidence of trafficking among minors, with 73.6% of victims under 18. West Bengal, in particular, is prone to this higher trafficking rate amongst minors as a result of its bordering of countries with high minor trafficking inflows or outflows, causing it to be prone to higher trafficking rates due to the ease of cross-border movement for traffickers. States with the highest rescue rates include Rajasthan, Maharashtra, and Odisha. Conversely, states like Kerala, Arunachal Pradesh, and Haryana lack anti-trafficking units, reflecting significant infrastructure gaps (Dakua et al., 2023).

Research has also revealed that 20.9 million adults and children are bought and sold worldwide into commercial sexual servitude, forced labour and bonded labour. With around two million children being exploited every year by being forced into the global commercial sex trade (Sarkar, 2014). Selling of young women is one of the fastest growing organised crimes and most lucrative criminal activities in the world. Girls are lured using a variety of tactics, which include promises of marriage, welfare, trips, pilgrimages, attractive salaries, goodies. These end up being disillusioning methods of coercing them into being trafficked, where often their bodies are exploited, as traffickers convince them that is the best way to support themselves and their families. Around half of the 45,000 girls trafficked in 2012, are to have been lured by promises of false marriage. Nepalese girls that were trafficked into India, were forced into prostitution, as reported by the United Nations Human Rights Watch (“India/Nepal: Rape for Profit,” 2024).

## **Conclusion**

As a result of the in-depth analysis conducted in this paper, a clear lack of effort can be seen in India’s human trafficking situation. Despite 2,250 cases being reported in 2022, only 107 convictions were secured, illustrating the inefficacy of India’s prosecuting system. In order to improve the situation, 5 key suggestions can be implemented:

**Strengthening the Capacity of Anti-Trafficking Units (AHTUs):** India’s Anti-Trafficking Units (AHTUs) are underfunded, understaffed, and often lack specialized training. To emulate Singapore’s success, India must increase funding for these units, hire more personnel, and provide specialized training to improve the quality of investigations. More AHTUs will lead to a higher level of surveillance in the country, ensuring that more human trafficking crimes are identified, and hence can be prosecuted accordingly.

**Improve Victim Protection and Support Services:** One of the significant gaps in India’s response to trafficking is the lack of robust victim protection services. Unlike Singapore, which has provisions for comprehensive victim care, India struggles with providing legal, medical, and

psychological support to survivors. Establishing more shelters, legal aid, and counseling services will ensure that victims are not re-traumatized after rescue.

In particular, regarding legal aid, victims can be helped by eliminating the perverse nature of the trafficking bill, which only provides immunity to trafficking victims that have committed crimes with a jail sentence of 10 years or higher. This would encourage more victims to come forth, as they would be ensured of their protection, and the inability of authorities to reprimand them for crimes they were coerced into committing.

**Increase Public Awareness:** Trafficking can be curbed by increasing public awareness around the topic. For instance, India can launch a nationwide awareness campaign which helps people understand the signs of trafficking and the process of reporting it. Singapore already has a TIP hotline and anonymous reporting system in place which has been successful in combating the problem of human trafficking.

**Fast-Track Courts for Trafficking Cases:** The legal system in India operates at a slow pace which causes significant delays in justice being served. The creation of fast-track courts particularly for trafficking cases can ensure swift justice. With a fast-track court in place, traffickers can be prevented from manipulating the legal system. This could be achieved by amending existing laws like the Criminal Procedure Code and Indian Penal Code, to prioritize human trafficking cases for fast-tracking. The 2018 Trafficking of Persons Bill could also be further expanded to include provisions for establishing specialized trafficking courts.

**Strengthen Regional and International Cooperation:** The problem of human trafficking exists across borders. India needs to strengthen its cooperation with all neighbouring countries and organisations such as INTERPOL and ASEAN to be able to effectively dismantle trafficking networks. There could be a creation of an Anti-Trafficking Database that helps agencies track the traffickers, missing persons and the rescued victims. It could function like INTERPOL's "I-24/7" global police communications system, enabling quick information exchange across borders.

Contrary to India, Singapore is well-known for strict laws, lengthy penalties and omnipresent surveillance. Despite this, The U.S. Department of State's 2024 Trafficking in Persons Report held that Singapore's enforcement could potentially be improved, while also acknowledging the country's efforts in combating human trafficking. The report held that Singapore's government did not prosecute or convict any cases of domestic servitude under the trafficking law despite clear trafficking indicators being present. Furthermore, the government also failed to take steps to eliminate recruitment fees charged to workers by Singaporean labor recruiters or ensure any recruitment fees were paid by employers. (*Singapore - United States Department of State, 2024*). Hence, Singapore is encouraged to take steps to prosecute more cases of domestic servitude as well as to eliminate recruitment fees paid by laborers.

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