

Ms Petya Nestorova
Executive Secretary of the Council of Europe Convention
on Action against Trafficking in Human Beings
Directorate General of Human Rights and Legal Affairs
Council of Europe
E-mail : Trafficking@coe.int

Dear Ms Petya Nestorova,

We are pleased to submit the enclosed document for consideration. It represents ECPAT Sweden's standpoint on the implementation of the Council of Europe Convention on Actions against Trafficking in Human in Sweden, from a child rights perspective.

We hope that the information will be useful in the coming discussions with the representatives of the Swedish government.

Comments from ECPAT Sweden in regards to the first evaluation on the implementation of the Council of Europe Convention on Actions against Trafficking in Human Beings in Sweden

1. Introduction

ECPAT Sweden was established in 1996, with 23 NGO member organisations as well as individual members. Its Advisory Committee represents various sectors of society including media, youth, child psychologists, police, Parliament, tourism, and the Stockholm University. ECPAT Sweden works for maximum realization in Sweden of the Agenda for Action adopted by the Stockholm World Congress against Commercial Sexual Exploitation of Children. In addition ECPAT works for Swedish and international conformity with Articles 34 and 35 of the UN Convention on the Rights of the Child. ECPAT Sweden has among many things developed a Code of Conduct for the Protection of Children against Sexual Exploitation in Travel and Tourism, which is now implemented by the tourism industry in over 40 countries world-wide. In 2005 ECPAT initiated collaboration between the national Police and all the major Internet service providers in order to block child abusive material on the Internet. To make it harder to use the financial systems for this trade, ECPAT started the process to form a financial coalition against child pornography in Sweden. This financial coalition is now in operation involving all the banks in the country. In collaboration with Police payments for child pornographic material are being identified and stopped. Over the years ECPAT Sweden has also conducted training on commercial sexual exploitation of children for police, prosecutors, judges, lawyers, teachers, as well as students of law, tourism, social work and journalism; organised wide-ranging awareness campaigns; and youth activities such as chat-conferences on child pornography and paedophile activities on the Internet. ECPAT Sweden has further been the only voice in Sweden highlighting the fact that Swedes go abroad with the purpose to sexually abuse children in developing countries. Furthermore, ECPAT has during the last ten years raised awareness on the vulnerability of children in the migration system.

ECPAT collects information on the situation relating to commercial sexual exploitation (CSEC) in Sweden, and situations that are linked to Sweden. ECPAT acquires its facts and figures of situations through first hand information, reviewing reports, research, conversations with experts, foremost individuals working directly with the issues such as law enforcement representatives, decision makers at various levels (local, regional, national, global), private sector representatives in the tourism-, transportation-, IT- and finance industries, and through direct information as acquired by the ECPAT Hotline. The following analysis of the situation in Sweden regarding the implementation of the Council of Europe Convention on Actions against Trafficking in Human Beings, is mainly focused on trafficking in children for sexual purposes.

2. Substantive analysis

Article 5- prevention of trafficking in human beings

After years of preparations and a prolonged process, the National Action Plan against prostitution and human trafficking (2008-2010) suggested several valuable measures addressing both children and adults in order to increase the protection and support, reinforce the preventive work, the quality and efficiency in the judicial system and increase the national and international co-operation.

However if the period of implementation had been longer, and the large amount of activities had been co-ordinated among all the actors and on a national level, the result had most probably been significant. Combating trafficking and sexual exploitation of children in particular is an on-going process and unfortunately not "fixed" in a period of two years.

In December 2011 National Council for Crime Prevention (BRÅ) published a final report on the Governments Action Plan against trafficking (Report 2011:18). BRÅ concluded that the NPA has consisted of a wide range of measures, which have been valuable in this first phase. However, at the moment there is a need for a more structured and long-term approach, based on the experience gained during the period of the NPA. Continued efforts should focus on increased understanding of trafficking, data-gathering, continued development of methods and better coordination and collaboration. As of today there have been no actions taken to update the NPA, nor any comments from the government on the evaluation of the NPA. Although the Action Plan is not yet revised, some initiatives have received continued funds until 2014, among others the County Administrative Board in Stockholm has since 2011 been appointed responsible for coordinating the prevention of trafficking in Sweden. In 2011 they presented National Guidelines on preventing trafficking, which entails specific focus on children and a wide multi-stakeholder collaboration. There have been some state-funded initiatives on prevention, however with a wider perspective, i.e. on grey zones on the internet for young people and CSEC in general. E.g. the Swedish National Board for Youth Affairs project on CSEC on the internet¹. The actions stated in the NPA with a focus on children have put more focus on training staff in social services, youth shelters, schools, health care, the police and other authorities. Unfortunately this is still done on an ad-hoc basis. Historically Sweden has focused mainly on women at risk of being trafficked, but ECPAT Sweden has noticed a small shift in the language used by officials,

¹ For more information on this please see: http://www.ungdomsstyrelsen.se/english_main/0,2693,,00.html

now referring more to the need for specific focus on children and not only focusing on women victims of trafficking or otherwise commercial sexual exploitation.

Recently the Stockholm police have allocated two policemen focusing on operative activities, actively reaching out to children at risk of being commercially sexually exploited. The two policemen attempt to intervene in an early stage with the support of the social services, while at the same time targeting the “buyers”. This has led to the discovery of several vulnerable minors who earlier were undetected. To ECPAT Sweden’s knowledge the Stockholm Police and social services are the first authorities in Sweden actively focusing on children at risk of commercial sexual exploitation and not only women at risk.²

The trafficking legislation was revised in 2010 and the government has not made any promises regarding further improvements on the legislation. The legislation in its current wording is in line with the Palermo protocol. However, in practise there are still gaps in the protection for children victims of trafficking. The irrelevance of the victims consent is not mentioned in the legislation. Also there are still cases where the trafficker is convicted for procuring instead of trafficking. This is supposed to change with the 2010 trafficking legislation, but until today we have not noticed any changes in practice.

The trafficking law is in practice limited to cross-border with foreign victims and not applied when it comes to Swedish cases.

Article 6 – Measures to reduce demand

The lack of priority and understanding of the complexity of commercial sexual exploitation of children becomes highly visible when it comes to sanctions pertaining to the crimes relating to the offender and demand side of commercial sexual exploitation of children. For example measures in relation to the purchaser (purchasing sex from a trafficking victim, purchasing sex in connection with travel in other countries), are practically none in Sweden as of today. Commercial sexual exploitation of children is often sanctioned with an economic penalty. The commercial aspect of the sexual abuse, the remuneration, seems to undermine the legal protection of children. When the child is close to the age of consent, which is 15 years old, there is practically no legal protection in Sweden. The arguments from the perpetrators that he/she believed the child was over 15 are in general accepted. Please contact Märta C Johansson, at Örebro University for further information on this note.

Furthermore, Sweden has a poorly developed system for offender management to prevent offenders from initiating exploitation (potential perpetrators) and recommitting exploitation (if already sentenced). Until recently the only care and rehabilitation services that existed were within the prisons. Since most sex offenders do not receive a more severe penalty than an economic penalty, most sex offenders are not offered treatment.

There are few prevention programs addressed to potential offenders, or for preventing new crimes for punished offenders. The care and rehabilitation services that exist are within the prisons and limited treatment in open care. In recent years the care is also offered within the Probation service but it is not a routine to offer all sex offenders such care, when not sentenced to prison. Currently there are two projects in Sweden to which persons can turn, if they are about to initiate or recommit sexual exploitation of children; the Centre for Andrology and Sexual Medicine at the Karolinska University-Hospital, which assists individuals suffering from conditions such as compulsive sexual behaviour and sexual

² Two Swedish articles on how the police work http://www.polisen.se/Stockholms_lan/sv/Om-polisen/lan/St/op/Polisen-i-Stockholms-lan/Sambandet/Sambandet/Oktober-2008/Barnsexhandeln-okar-markant/ and <http://www.dn.se/sthlm/har-saljer-barn-sex-i-stockholm>

addiction, as well as the project called “KAST”, that offers support to buyers of sexual services via telephone, Internet and individual meetings.

The Centre for Andrology and Sexual Medicine at the Karolinska University-Hospital has recently received funds from the government to establish national network of health care providers offering help and also to develop evidence-based methods of treatment for offenders and at risk offenders. In March 2011 they also started a helpline for offenders and potential offenders, called Preventell³.

In a report by the National Board of Health and Welfare's from 2011 one can read the following conclusion:

”The National Board of Health and Welfare is of the opinion that tried treatment efforts should be further elaborated and be made available for men, women and children who have committed or run a risk on committing sexual offences. The availability to treatment for children with sexually oriented problematic behaviour and young people who have committed or run a risk of committing sexual offences, is restricted to the southern part of Sweden. The National Board of Health and Welfare emphasizes the importance of the development of regional proficiency centres to facilitate access for children and young people to evidence based treatment efforts geographically nearer their home district. The current level of understanding of children with sexual behaviours towards others is limited, as well as how their problems can be treated. Considerable efforts are called for in this field and the National Board of Health and Welfare recommends special investments in order to provide personnel in pre-schools, recreation centers, schools, social services as well as parents the support they require.”⁴

In addition, not all professionals working with children are covered by the obligation to show an abstract of the criminal record. The Swedish model is limited to a few professional groups and does not prohibit the employer to hire a person, who has been sentenced for sexual abuse of a child, trafficking or child pornography. It is a decision the legislator leaves to the employer. Also, there is a screening of the criminal record, e.g. removal 10 years after the judgment or court decision, or 10 years after the sentence is expunged.

Article 10 – Identification of victims

UNICEF Innocenti Research Center reviewed the Nordic situation on trafficking in 2012, *Child Trafficking in the Nordic Countries: Rethinking strategies and national responses*⁵. In connection with the publication of the report UNICEF Sweden reported the following: *“There is considerable uncertainty in regards to the authorities and their mandate and responsibility. Despite many efforts to increased knowledge, the absence of actual action is striking in terms of support for individual children who may be vulnerable to trafficking. Both the Social Services Act and the CRC are clear about the rights of all children who reside in Sweden to receive help if mistreated. However, children are still being exploited right in front of officials from various government agencies without being detected.”* In the report they further elaborated on how children in Sweden may not be identified as victims of trafficking since many exploiters are charged for procurement instead of

³ <http://preventell.se/>

⁴ Behandlingsinsatser för personer som har begått eller riskerar att begå sexuella övergrepp mot barn, Socialstyrelsen 2011 (Rehabilitation efforts targeting individuals who have committed or run a risk of committing sexual offences against children) page 8

⁵ http://www.unicef-irc.org/publications/pdf/nordic_countries.pdf.

trafficking. Something which severely affects children's entitlements to legal assistance and compensation.

In addition, the governmental analysis of children at risk of trafficking have until recently only focused on the identification of unaccompanied asylum-seeking minors and efforts assuring that they do not disappear. Due to ECPAT Sweden's initial investigations, there are now statistics on the number of unaccompanied minors that arrive and how many of these disappear in Sweden. The majority of the unaccompanied children disappear after a decision is given by the Migration Board; however, there are also those children who disappear before a decision on asylum is given.

There are however other risk situations. Unaccompanied asylum-seeking minors, who are placed with relatives or their family, may run a risk of commercial sexual exploitation. More than half of all unaccompanied minors are placed with families or relatives. When a child is picked up from a special unit by a person who claims to be a family-member or a relative, the kinship is not always controlled. The family placement of foreign children is not investigated as extensive as for Swedish children. In a report conducted by Save the Children in 2008, "What has happened – unaccompanied asylum-seeking minors – reception since the municipalities have taken over the responsibility of accommodation and care") one can read the following:

... "The municipalities are doing an investigation; they control the criminal register of the police and visit the family. But it is difficult; the children can be brought to Sweden by smugglers and are forced to different undertakings. Normally one gathers information about the background, but in these cases this is not done. It is a private placing and the families would never be approved as foster homes..."

... "If they are treated as Swedish children? No, they are not. My workload is for example much bigger than that of other social workers and when it comes to Swedish cases the investigation is much more extensive...."

Other groups of children at risk of sexual exploitation

ECPAT advocates a wider perspective of children at risk in the migration system. There are also other groups of children than unaccompanied asylum-seeking minors, who are at risk of commercial sexual exploitation in the migration system. It may be children arriving to Sweden after supposed custodians, children arriving with adults falsely acting as legal custodians, undocumented children, children of irregular immigrants, children entering Sweden with the use of look-alike-passports etc.

The following fictive case illustrates the problem with children arriving after supposed custodians. Parents A and B arrive to Sweden in the year of 2003 and register at the Migration Board. In the investigation they mention that they have three children, including their ages. The three children are accompanying the parents. No questions are asked and it is assumed that these children are those of their parents. In 2005, another child arrives to the Migration Board without parents. The same parents, A and B, claim that the child is theirs. Even if there is no legal document supporting this, and even if they did not declare the existence of this child in the first investigation of their family situation in 2003, it is presumed that the child is also theirs. Even if the asylum investigator finds something in the situation that appears to contradict, the only remedy at hand is to alert the social services or the police for follow up. Such follow up may take weeks in practise. The legal presumption is that the child is that of the claimed custodians, and not even if there is reason to believe this is not the case, does the Migration Board have enough remedies to not give away the child to the claimed parents or

custodians. It has come to ECPAT Sweden's knowledge that this loophole is used to smuggle children to Sweden for exploitation. A woman testified in an interview in 2004 (in Swedish Television) that she was offered 7000 USD to smuggle a child to Sweden, register it as her own and then leave it. Even if the Migration Board is doing a review of its routines, it is urgent that immediate protective mechanisms are put in place to protect potential victims.

Children entering Sweden with the use of look-alike-passports is another group of children at risk of exploitation. ECPAT learnt about a case in 2004 where a Somali woman had been travelling between Sweden and Somalia 23 times during a period of ten months. It was suspected that she at least 16 times had brought children that were not her own, in the name of her own children. The police investigation was closed due to lack of evidence. The use of look-alike-passports has been highlighted several times in the annual reports on trafficking by the Swedish National Police. Another risk situation is when children do not have their own passports or social security registration number and are unknown to the authorities, e.g. children born in Sweden by parents that are irregular immigrants/ in hiding.

The conclusion is that the Government has to take the starting point of a child's perspective to identify risks. Organized criminal groups and others interested in trafficking children to or through Sweden will not only look to abuse the system of unaccompanied asylum-seeking minors, but obviously try all possible ways. The intelligence gathering and analysis must improve, in order to enable detection of new groups of children at risk of commercial sexual exploitation in the migration system. Further routines and collaboration between responsible authorities, such as the Migration Board, the Police, the National Board of Health and Welfare and also the municipalities, must improve and increase to better protect all children at risk in the migration system.

Regrettably the child perspective is still lacking when it comes to prevention, repatriation, care, rehabilitation of victims of trafficking. The understanding of which groups of children are at risk of becoming victims of trafficking for sexual purposes or any other purpose is still very limited, even outside the migration system.

If national children are poorly protected from sexual exploitation, in Sweden foreign children and children in hiding are even less protected.

Article 12 – Assistance to Victims

It is very apparent that Swedish judges have no understanding of the specificity of the victim's situation and appearance in court. Even if the Palermo Protocol clearly and explicitly states that any purported or claimed willingness or intent of the child to participate in the exploitation is invalid, Swedish courts take this into consideration when judging the illegality of the traffickers and crimes committed.

In addition, there are obvious differences between the support given by social services to Swedish children at risk and foreign children at risk, as for example illustrated in the Save the Children Sweden report about unaccompanied asylum seeking minors. ECPAT Sweden would also like to bring to your attention the UN Committee on the Rights of the Child's concerns on this note, expressed in Concluding observations (CRC/C/OPSC/SWE/CO/1) paragraph 35 and 36, enclosed to this document (annex 1).

The Children's Welfare Foundation noted in its report 2009 to the Government that "*the knowledge of professionals on sexual exploitation is still relatively low in parts of Sweden.*" According to the Children's Welfare Foundation, representatives from, for instance, the police, the social services and schools have drawn attention to difficulties in dealing with

sexual exploitation with existing resources. As a consequence of lack of knowledge there are no structures or routines on how to prevent the problem and protect children from commercial sexual exploitation.

In addition, UNICEF has raised concerns about the role of interpreters. *“In Sweden, for example, problems included inaccurate translations, editing of responses, and even pressure exerted by interpreters on the children. A lack of sufficient training for interpreters, for example on asylum procedures, was also noted.”*⁶

Foreign children who have applied for a residence permit can access health and medical services as children living in Sweden. However, at present, undocumented children and children that for any other reason are considered irregular migrants in Sweden can be denied access to medical care. In 2011 the government presented a bill changing this legislation in the future. In an interview broadcasted on 26 December 2011 on the Swedish radio (www.sr.se) the Minister for Social and Health Affairs and the Minister for Migration and Asylum Policy were asked about the bill and why no action has been taken since the bill was proposed in May 2011. The Minister for Social and Health Affairs claimed that the conservative party (and the current leader of the government) is blocking the bill at the moment. Several NGOs are advocating the bill to pass.

In addition there is no helpline for children victim of trafficking. A general NGO-helpline for children exists on violence against children etc (operated by BRIS, Children's Rights in Society), but not specific to trafficking. Since the end of 2010 there is also a state-operated, general helpline for victims of trafficking (<http://safetrip.se/en/>), however not targeting children, but women. The staff is not trained on CSEC nor is the helpline accessed by trafficked children.

There has been some indications on a start of the European hotline for missing and exploited children (116 000) in 2012 from the Ministry of Health and Social Affairs, but at this moment it is yet unclear what the target group will be and if it will include trafficked children and be accessible for children not speaking Swedish or English.

Article 15 – Compensation and legal redress

Compensation is hard to receive in cases of sexual exploitation, in part because many of the crimes require the identification of a perpetrator, or are offences against the state.

“Procuring may as such confer the right to damages for a violation in some cases. However, one precondition is that the perpetrator subjected the person to whom the procuring offence refers – in this case the Aggrieved Party – to a serious violation of personal integrity, e.g. by him having exploited in an offensive or atrocious way the Aggrieved Party for the purpose of casual relations for payment” (cf. Swedish Government Official Reports – SOU 1992:84, p. 268).

“The procuring offence committed by XX did not include any such elements that mean that it constituted such a serious violation of the Aggrieved Party’s integrity that there should be a

⁶ Referring to e.g. Keselman, Olga, Restricting Participation, Unaccompanied children in interpreter-mediated asylum hearings in Sweden, Linköping Studies in Arts and Science No. 501, Studies for the Swedish Institute for Disability Research No. 31 Linköpings universitet, Institutionen för beteendevetenskap och lärande (The Swedish Institute for Disability Research), Linköping, 2009, p. 31.

liability to pay damages. The Aggrieved Party's action for damages against XX shall consequently be rejected."

In addition, a review carried out by the Crime Victim Compensation and Support Authority in 2010, concerning court decisions in criminal action regarding human trafficking and similar crimes, showed that only a little more than half of the victims claimed damages from the perpetrator, partly due to the fact that the victims were afraid. Furthermore, the authority "*considers that it should be possible to view victims of trafficking as an injured party in the criminal process and for them to access compensation or damage for violation of integrity irrespective of the classification of the offence.*" Further, the County Administrative Board in Stockholm's report on safe return for victims of trafficking for sexual purposes stated that there are difficulties concerning injured parties legal counsels, since their formal assignment ends when the verdict is notified by the court. Therefore, leaving a gap in the responsibility in terms of overseeing that the damages are actually being paid to the victim.

Article 16 – Repatriation and return of victims

A Swedish state report (The County Administrative Board, Stockholm, Ett Tryggare återvändande (A safer return), report 2010:03) reveals and confirms ECPAT's understanding of a lacking child perspective in regards to return of victims. Firstly, a child perspective is missing when the process for safe return is handled by Swedish authorities. Routines for collaboration and cooperation between authorities and organizations have until recently been missing. Secondly, communication and cooperation between actors in the home country is lacking. There is a particular need for a child perspective when children are to be returned home. As mentioned above in regards to article 5, national guidelines on preventing trafficking (including on safe return) have been developed and distributed to all counties and municipalities in Sweden. However, despite the guidelines, the County Administrative Board in Stockholm has identified further problems in regards to a safe return for trafficked victims, stating that the Swedish authorities still will have difficulty meeting the requirements in regards to international law and practice. Hence, the support still needs to be developed.⁷ ECPAT would also like to add that the guidelines, although warmly welcomed and well formulated, are not yet well known by the actors who needs them in order to give children victims of trafficking the support they are entitled to.

Article 22 – Corporate liability

Regarding article 22 on corporate liability ECPAT would like to bring to your attention the criticism and recommendations provided by the UN Committee on the Rights of the Child to the Swedish government in October 2011. In the Concluding observations (CRC/C/OPSC/SWE/CO/1) on the Swedish implementation of the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography the committee noted the following:

“Liability of legal persons

31. The Committee notes with concern, that the State party has not taken further measures on establishing corporate liability for crimes under the Convention and its Protocols and that sanctions against corporate entities remain limited to pecuniary penalties.

32. The Committee recommends that the State party ensures that in addition to pecuniary penalties, there is legislation and commensurate criminal, civil or

⁷ <http://www.lansstyrelsen.se/stockholm/Sv/manniska-och-samhalle/jamstalldhet/prostitutionochmanniskohandel/Pages/tryggare-atervandande.aspx> (webpage in Swedish, for more information please contact Claes Lyckner, social.stockholm@lansstyrelsen.se)

administrative sanctions for ensuring the undertaking of measures that effectively prevent the recurrence of such offenses. It further invites the State party to encourage corporations to:

- (a) Establish an ethical policy concerning the commercial sexual exploitation of children;
- (b) Insert respective clauses inside contracts with suppliers.”

Conclusion

Sweden stands far from protecting children, in Sweden from trafficking and other forms of commercial sexual exploitation of children. Although trafficking is a generally well known in Sweden, trafficking in children and focus on all forms of exploitations is still a not enough prioritised issue among professionals working to protect children’s rights against commercial sexual exploitation. The general legislations are in place but the penalties are too low and therefore the crimes are not given priority. The combination with several involved ministries and a lack of a fundamental strategy reaching over several years, involving all actors in the society, influence the result and impact of the activities carried out in Sweden to combat commercial sexual exploitation of children. Each enumerated activity initiated by the government during the last years are warmly welcomed but without a strategy focusing on demand, how to fight the probability and to increase the effectiveness to support children from a low age and a plan how to foresee new risk situations, it will be hard to fulfil the Swedish governments’ own vision that no children in Sweden shall be sexually exploited.

It is imperative that the Swedish Government accepts its responsibility and fulfils its commitments according to the Council of Europe Convention on Actions against Trafficking in Human Beings, the Agenda for Action from the first World Congress against Commercial Sexual Exploitation of Children in Stockholm 1996, and the subsequent action plans adopted in Yokohama and Rio de Janeiro, and also fulfils the commitments under the Convention on the Rights of the Child and its Optional Protocol to protect all children throughout the world.

Recommendations

ECPAT Sweden would like to make the following recommendations:

Article 5- prevention of trafficking in human beings

- Establish coordinated approach between all entities collecting data on children and introduce a comprehensive system of data collection of victims of trafficking and sexual exploitation, including persons identified being at risk of trafficking.
- Follow up the evaluation of the Trafficking NPA with a long term strategy covering all forms of trafficking, international and internal and for other purposes than sexual, with specific focus on preventing trafficking and exploitation of children.
- Give increased resources to the police and the social services in Stockholm and nationally to develop the operative efforts to help children at risk for commercial sexual exploitation.
- Develop and implement an ethical policy against commercial sexual exploitation of children on governmental, parliament and municipal level.

- Review the legislation “Purchase of sexual act of a minor” since the law sanctions sexual abuse of children and legalize commercial sexual exploitation of children.
- Appoint a governmental inquiry on perpetrators and organisers of trafficking.

Article 6 – Measures to reduce demand

- Increase and make available treatment for offenders, for men, women and children who have committed or run a risk on committing sexual offences, in all parts of Sweden.
- Prohibit individuals, being sentenced for trafficking in human beings, child pornography and sexual offences against children, to work with children, regardless if the employment is in the public, private or non-profit sector.
- Exclude the screening of the criminal record for the crimes mentioned above.

Article 10 – Identification of victims

- Make education about commercial sexual exploitation of children compulsory for all professionals working with and for children
- Increase the intelligence gathering and analysis in order to enable detection of new groups of children at risk of commercial sexual exploitation and/or trafficking, including by doing early interventions aimed at both children and parents at risk.
- Investigate and raise awareness on trafficking within Sweden.

Article 12 – Assistance to Victims

- Facilitate for victims of trafficking to receive a permanent residency in Sweden.
- Make the compensation to children being trafficked compulsory.
- Improve efforts to provide trafficking-specific assistance to child trafficking victims, including by developing a helpline for trafficked children.

Article 15 – Compensation and legal redress

- Make the compensation to children being trafficked compulsory.

Article 16 – Repatriation and return of victims

- Distribute and implement the guidelines for a safe return to all actors that may come in contact with children victims of trafficking.

Article 22 Corporate liability

- Take further measure in addition to pecuniary penalties, to develop legislation and commensurate criminal, civil or administrative sanctions to ensure the undertaking of measures that effectively prevent the recurrence of trafficking, child pornography and sexual offenses.