

OPTIMIZING
SCREENING AND
SUPPORT SERVICES
FOR VICTIMS OF
GENDER-BASED
VIOLENCE AND
TRAFFICKING IN
PERSONS

INDIA







TABLE OF CONTENTS

CHAPTER 1 - INTRODUCTION	03
1.1 Methodology and Data Collection	03
CHAPTER 2 - UNDERSTANDING OF TRAFFICKING	
IN PERSONS AND GENDER-BASED VIOLENCE	03
Major Findings	04
2.1 Trends and Patterns of TIP in India	04
2.2 Trends of Gender-Based Violence	04
2.3 Understanding of TIP and GBV	05
2.4 Understanding of TIP, Human Smuggling, Migration	
and their intersections	05
2.5 Challenges to Screening and Identification of TIP $\&$ GBV Victims	
Major Recommendations	05
CHAPTER 3 - LEGAL FRAMEWORKS ON TRAFFICKING	
IN PERSONS AND GENDER BASED VIOLENCE	80
Major Findings	08
3.1 Gaps and challenges in the legal framework	08
Major Recommendations	09
CHAPTER 4 - SERVICES AND SERVICE DELIVERY	
FRAMEWORK ON TIP AND GBV	09
4.1 Existing Service Delivery Framework	09
4.2 Challenges in service delivery	11
4.3 Rehabilitation and reintegration of TIP and GBV victims	11
4.4 Criminal justice delivery in cases of TIP and GBV	12
4.5 Integration or Separation of Services for GBV and TIP Victims	12
Major Recommendations	13

This research was funded by a grant from the United States Department of State.

The opinions, findings and conclusions stated herein are those of the author[s] and do not necessarily reflect those of the United States Department of State.







CHAPTER 1 - INTRODUCTION

Trafficking in Persons (TIP) and Gender-Based Violence (GBV) are serious human rights violations, which are deeply rooted in inequality and systematic discrimination disproportionately affecting certain groups of society, especially the marginalized and the vulnerable communities. Various forms of GBV, such as social discrimination, harmful cultural practices, and violence within or outside the family increase the vulnerability of a person, especially women and children, to trafficking. It is imperative to recognize however, that while TIP and GBV crisis is proliferating, the redressal mechanisms namely – law enforcement and the service provisions – are inadequately equipped to respond, both at the state and non-state level. This three-country research study 'Optimizing Screening and Support Services for Victims of Gender Based Violence and Trafficking in Persons' conducted in – India, Nepal and Sri Lanka aims to identify gaps, challenges and promising practices in integrating or separating services for TIP and GBV victims and to optimize screening and support services.

The study has been conducted as part of an 18-month research project supported by the United States Department of State (J/TIP) and was undertaken by The Asia Foundation (TAF) in partnership with FXB India Suraksha (FXBIS) in India. Given the vast geography, a pan India study would have been both ambitious and time consuming, therefore six states were selected for a more comprehensive coverage, namely - Delhi, Goa, Kerala, Madhya Pradesh, Maharashtra, and Manipur.

1.1 Methodology and Data Collection

This study is based on i) secondary data and literature analysis, ii) legal framework study and, iii) analysis from primary field research done through key informant interviews (KIIs), focus group discussions (FGDs), and case studies gathered from the field.

The stakeholders identified for KIIs were - law enforcement officers (police, judicial officers, and public prosecutors), service providers (NGOs, shelter homes, government officials) and, victims of human trafficking and gender-based violence. Key stakeholders from the selected states were mapped prior to commencing the KIIs. There were several challenges to the field research due to the COVID-19 pandemic and its resultant lockdowns, which did not allow for direct face-to-face interviews and in person focus group discussions. The entire KIIs and FGD process was thus moved online, while the field research was completed HOW??. A total of 70 interviews and one FGD with service providers was conducted.

CHAPTER 2 - UNDERSTANDING OF TRAFFICKING IN PERSONS AND GENDER-BASED VIOLENCE

Chapter 2 deals with the current scenario and nuances of Trafficking in Persons and Gender-Based Violence in India; the definitional issues around terminologies – i.e., smuggling of migrants and migration, which are inherently different but often [mistakenly] used interchangeably with TIP; conceptual clarity on different categories of trafficking victims and the understanding of the responders; and the barriers and challenges in victim screening and identification.

Major Findings

2.1 Trends and Patterns of TIP in India¹

Chapter 2 deals with the current scenario and nuances of Trafficking in Persons and Gender-Based Violence in India; the definitional issues around terminologies – i.e., smuggling of migrants and migration, which are inherently different but often [mistakenly] used interchangeably with TIP; conceptual clarity on different categories of trafficking victims and the understanding of the responders; and the barriers and challenges in victim screening and identification.

Increasing trend of human trafficking - The Crime in India reports over the past few years (2015 to 2019) reveal that trafficking cases surged in the year 2019 with 6,616 persons being trafficked, in comparison to the previous reporting years of 2017 and 2018. Even as the number of persons trafficked and rescued showed an increase, the conviction rate dipped to 22 percent in 2019 compared to 29.4 percent in 2018 and 24.5 percent in 2017. Among the selected states for this study, Maharashtra topped the country in the number of TIP cases [under the Indian Penal Code (IPC)] in 2018 and 2019.

Evolving modus operandi and places of TIP - The modus operandi and the places of trafficking are evolving, and new emerging trends are seen as online modes for trafficking are either replacing the traditional methods or are simultaneously used with the traditional methods for trapping victims. Perpetrators are increasingly using the internet and social media platforms such as WhatsApp, Facebook, etc., to trap young people into trafficking situations. Recruiting, soliciting, and monetary transactions are moving online (especially in commercial sexual exploitation (CSE) cases), making it extremely difficult for detection and identification of traffickers. Traditional brothel-based exploitation is also shifting to private apartments, lodges/hotels, beauty and massage parlors for CSE; and informal workplaces for forced labor.

2.2 Trends of Gender-Based Violence³

Increasing trend in crimes against women - Crime in India reports signify an increase in cases of violence against women with a 7.3 percent surge in 2019, from the previous year. A majority of the Indian Penal Code (IPC) cases in 2019 were registered under different sections of 'Cruelty by Husbands and Relatives', 'Assault on Women with Intent to Outrage her Modesty', 'Kidnapping & Abduction of Women', and 'Rape'. Among the selected states for this study, Maharashtra had the highest number of GBV cases in 2019, followed by Madhya Pradesh, Delhi, Kerala, Goa and Manipur.

Lack of inclusivity in dealing with GBV - Field interviews indicated that GBV is narrowly understood as violence against women and disregards violence faced by men and other genders, particularly in inter-personal relationships. For example, gender norms, social stigma, and shame prevents men from being recognized as 'victims' of spousal and other violence. The transgender community due to their 'non-conforming' social identity also face extreme

- 1 For details refer to section 2.2 in Chapter 2 of the full Report.
- 2 The Crime in India 2020 report is not available on the date of finalizing the study.
- 3 For details refer to section 2.3 in Chapter 2 of the full Report.

violence both within and outside their families. This research finds there is under-reporting of such cases, as they are not included in official statistics and the legal framework, except under the new Transgender Persons (Protection of Rights) Act of 2019.

2.3 Understanding of TIP and GBV⁴

Understanding of TIP and GBV among the respondents - Though the respondents are aware of various forms of GBV (physical, sexual, psychological, economic), most of them relate it with domestic violence. All the respondents however, unequivocally accept that women constitute an overwhelming number of those affected by GBV. Stakeholders largely displayed conceptual clarity and the understanding of human trafficking; while a few related trafficking only to prostitution.

Intersectionality between GBV and TIP - The research reflects a definite intersectionality between GBV and TIP and the impact that one has on the other. The experiences of violence, abuse, and exploitation run in a continuum for persons experiencing GBV, which often leads to their being trafficked. There is however, inadequate understanding about gender-based violence in a trafficking situation.

Understanding on commonality of experiences between GBV and TIP victims - The common experiences highlighted by respondents were various forms of abuses – psychological, physical, sexual, labour, wage related, stress, use of force; and other factors such as – male perpetrators (mostly), poor self-worth among victims, lack of control over one's life, lack of family support, lack of trust, and the feeling of being misjudged in society. Some believed that victims of GBV and TIP have very disparate journeys, with the latter experiencing more 'painful' encounters than the former, and diverse perpetrators, compared to a GBV victim.

2.4 Understanding of TIP, Human Smuggling, Migration and their intersections⁵

Lack of clear understanding of the three concepts - A general lack of conceptual clarity was found among the first responders regarding these three concepts, leading to uneven responses in intercepting/detaining people crossing the borders. This further impacted their ability to understand the differences between people generally vulnerable and the actual victims of trafficking, as well as the desired responses for both categories. Such misconceived responses impact people's mobility and ability to migrate for work, especially in the case of women.

2.5 Challenges to Screening and Identification of TIP & GBV Victims⁶

Absence of appropriate protocols for screening and identification - India does not have standard protocols and indicators for identifying victims of TIP and GBV. Although some SOPs and protocols are issued from time to time by various government and non-government agencies, they are not focused on

- 4 For details refer to section 2.4 in Chapter 2 of the full Report.
- 5 For details refer to section 2.5 in Chapter 2 of the full Report.
- 6 For details refer to section 2.7 in Chapter 2 of the full Report.

identification of victims of TIP. Further, Law Enforcement Officials reported dissemination issues and lack of information about these protocols.

Lack of comprehensive training of LEOs - A majority of the interviewed LEOs and border officials had not received any training prior to working on GBV and/or TIP despite multiple government and non-governmental agencies conducting training programs. Though the rate and intensity of training programs, especially for the police, have increased in recent times, poor follow-up makes them unsustainable. There is rarely any assessment and evaluation of training programs and their actual impact on the ground.

Lack of coordination and cooperation among stakeholders - The tendency among the stakeholders to work in isolation and the lack of coordination among specialized units dealing with TIP and GBV affect the screening and identification process.

Lack of cooperation from the victims and the local community - Victims turning hostile and non-cooperative during the process of screening and identification, and also in the courts, was identified as a major challenge by various stakeholders.

Major Recommendation

For the Government

Mapping of vulnerable areas and hotspots for human trafficking

- Working with NGOs, identify vulnerable areas and/ or hotspots for trafficking by mapping a) existing vulnerable areas, b) acute vulnerable areas, and c) potentially vulnerable areas. This will help with designing focused strategies for prevention of trafficking.
- Prioritize preventive measures by planning and executing area-specific solutions to the factors that create vulnerabilities in the first place within communities, especially in the vulnerable areas.

Guidelines and protocols

- Prepare and make available standardized guidelines and protocols for screening and identifying victims of TIP for all relevant agencies, namely, the police, border and immigration officials, labor inspectors, authorities under the Juvenile Justice Act, 2015, health professionals, and others.
- Upgrade existing SOPs and protocols on investigation and prosecution of cases of human trafficking, by including new legislations and amendments to the existing laws.

For law enforcement agencies:

Strengthening law enforcement responses through training and capacity building to increase efficiency of screening and identification of victims, and delivery of criminal justice

- Step up training to increase awareness among police, prosecutors, and judicial officers on conceptual issues related to TIP and GBV and their intersections, 'consent' in TIP cases, the modus operandi of traffickers, and the new emerging trends of trafficking. Mandatory training also should be conducted for border officials on screening and identification of victims of TIP and those in vulnerable situations.
- Include gender sensitization as an important component of training programs towards understanding the nuances of TIP and GBV and their impact on each other. Training should focus not only on GBV faced by women, but men and other genders as well; and address preconceived notions and prejudices based on socio-cultural norms.
- Provide more rigorous training on the legal framework for police, prosecutors, and judicial officers, to help them understand the substantive and procedural aspects of the laws on TIP and GBV and their practical application.
- Link the training to the professional upgrading of police officials to create motivation and involved participation. Anti-Human Trafficking Units (AHTUs), Women Cells, One Stop Crisis Centers (OSCC) and other similar units should be assigned such trained officials for practical utilization of their training.
- Design monitoring and impact assessments along with the training programs to measure the practical effectiveness and utility of the learning at the field level.

For service providers:

Building awareness among the public and within communities

- In collaboration with the government, raise awareness about human trafficking within communities and the public, especially highlighting the modus operandi of traffickers.
- In collaboration with the government, build awareness on existing and available services to enable victims to access them. Victims interviewed especially recommended the involvement of community leaders (village leaders/ panchayat members) in dissemination of information about existing help centers in the community.
- Foster strong community-based monitoring with the participation of village leaders/ panchayats, and religious leaders to be effective first responders in preventing TIP at the village-level.

CHAPTER 3 - LEGAL FRAMEWORKS ON TRAFFICKING IN PERSONS AND GENDER BASED VIOLENCE

This chapter deals with an analysis of the existing laws, gaps and challenges in the legal framework and gives a brief account of the government schemes and policies that are operational in the context of TIP and GBV. The chapter concludes by providing brief snapshots of some landmark judgments delivered by the higher courts on TIP and GBV.

Major Findings

3.1 Gaps and challenges in the legal framework⁷

Absence of a comprehensive TIP law - India lacks a comprehensive stand-alone law on human trafficking⁸. This "compels" the law enforcement officials to use different sections of the Indian Penal Code and different acts to establish the crime, which in turn creates ambiguities on the applicability of different laws.

Inadequacies in the Immoral Traffic (Prevention) Act (ITPA), 1956 - Though the major purpose of ITPA is to prevent trafficking of women and girls for the purpose of prostitution as an organized means of living, and suppressing CSE of any person, by criminalizing the procurers, traffickers, and profiteers of the sex trade, the law does not define trafficking per se. This law focuses on only one type of trafficking i.e., CSE, ignoring other forms of trafficking. The short-comings of ITPA to a certain extent have been addressed by the enactment of the Criminal Law (Amendment) Act 2013, through a new definition of TIP in Section 370 of IPC.

Inconsistency in the legal age definitions of a child - Although the Juvenile Justice Act, 2015 and Protection of Children from Sexual Offences Act, 2012, defines a child as a person who has not completed 18 years of age, other laws such as the Child Labour Act, 1986, and ITPA, 1956 have different age limits for defining a child. This creates confusion among the law enforcement agencies, especially in cases involving child trafficking for labor.

Uneven understanding of 'consent' - A lack of clear understanding of 'consent' in trafficking cases, especially in the responses from law enforcement officials, emerges as a major challenge. 'Consent' (as defined in Section 370 IPC) in TIP cases is understood unevenly due to social and cultural factors, and also due to lack of comprehension of the modus operandi of traffickers, leading to non-filing of cases. This lack of understanding sometimes leads to minors being charged as accused under the ITPA, instead of being considered under the protective provisions of the Juvenile Justice Act, 2015.

Legal anomalies associated with Gender-Based Violence - Similar to an absence of a comprehensive TIP law, there is also an absence of a holistic legislation for dealing with GBV cases in the country. Moreover, consent that is pleaded in defense in sexual violence cases, is sometimes not appropriately understood. The respondents identified that the Indian legal framework is women-centric in nature and reflects a huge gender gap for dealing with violence against (adult) male and transgenders due to socio-cultural norms and behaviors.

⁷ For details refer to section 3.4 in Chapter 3 of the full Report.

⁸ The government is currently seeking suggestions on a draft Trafficking in Persons (Prevention, Care and Rehabilitation) Bill, 2021.

Lack of proper implementation of laws - The existing laws are generally found to be adequate to deal with TIP and GBV. Their implementation however, is challenging given the lack of adequate legal knowledge and training on their recent amendments. Added to that are the prolonged investigations and trials of TIP cases, which often leads to the victims turning hostile and losing faith in the justice system.

Major Recommendations

For Government:

Mapping of vulnerable areas and hotspots for human trafficking

- Comprehensive laws on TIP and GBV, which are holistic and stand-alone legislations on both TIP and GBV, are needed to preclude the necessity of drawing upon different laws for investigating cases of TIP and/ or GBV.
- Amendment to ITPA, 1956 with inclusion of a broader definition of human trafficking and removal of the section criminalizing the victims involved in prostitution is needed.
- Fast track courts for GBV cases and special courts should be set up under the Immoral Traffic (Prevention) Act, 1956 for speedy trials.
- Strict implementation of all laws on TIP and GBV should be ensured, so that successful convictions act as a deterrence for perpetrators. Anti-Human Trafficking Units should be set up in all districts and should be strengthened with adequate human and financial resources for making it functional and impactful.

CHAPTER 4 - SERVICES AND SERVICE DELIVERY FRAMEWORK ON TIP AND GBV

Chapter 4 of the report focuses on the existing services available under various government-mandated policies and schemes in India for victims of TIP and GBV, and lists the various stakeholders involved in the service delivery system. In conclusion, this chapter addresses the crucial question on integrating or segregating services for victims of TIP and GBV.

4.1 Existing Service Delivery Framework9

Existing delivery framework - Services for TIP and GBV victims are provided through different schemes, plans, policies, and advisories, mostly implemented by the Ministry of Women and Child Development, with some by the Ministry of Home Affairs and Ministry of Labour and Employment. Schemes such as the Integrated Anti Human Trafficking Units, Ujjwala, Swadhar, One Stop Crisis Centers, Nirbhaya Fund, and various compensation schemes address issues related to prevention, protection, and prosecution. There, however, seems to be a gap in information on their monitoring, evaluation, and impact assessment to gauge their effectiveness. Government plans and

policies are also outdated and there is no information available on the operational status of some of them. Existing SOPs from different agencies are mostly for sex and labor trafficking, many of which are outdated and have not kept pace with the latest legal amendments. There is no SOP for handling cases of GBV.

Differential access to services - Access to services is inequitable in India and is based primarily on one's geography and gender. Services are concentrated in cities or urban areas. Often there is lack of services/shelter homes within districts, which hampers rescue efforts (in TIP cases) especially during nights. There are few services and no shelter homes available at the borders, with border officials reporting lack of knowledge of the existing services to assist TIP victims. Shelter homes and services are not available for all genders except in the case of children. There are no provisions prescribed under any law or government scheme to provide shelter home/services to transgender victims.

Barriers to accessing services - Multiple factors create barriers to accessing services - such as, lack of awareness on the availability of services amongst the general public and particularly women, especially in the rural areas; inadequate response from law enforcement officials due to existing gender prejudices and "lack of sensitivity"; delay or non-registration of First Information Reports; lack of functional AHTUs; lack of cooperation, communication, and coordinated action amongst stakeholders; non-availability of services in remote areas/place of origin of TIP victims; GBV victim's inability to identify self as a 'victim' of violence especially in domestic violence cases; and victims' fear of retaliation from perpetrators, shame, stigma, lack of trust and no family support.

Accessibility of services during the COVID-19 pandemic - An upsurge in cases of GBV was seen during the lockdowns imposed due to the pandemic. Lockdown restrictions made reporting of cases as well as seeking of services by victims of GBV a big challenge as they could not reach out to service providers due to restricted mobility. Shelter home services were affected due to social distancing procedures within the institutions and limited spaces for quarantine; new admissions were not made. Interviews during the data collection suggested the future possibility of increase in number of TIP cases as the pandemic exacerbated existing vulnerabilities (especially of children and adolescents), created new ones, and pushed people in already disadvantageous economic conditions to further risky and exploitative situations. Stakeholders highlighted that there were no written protocols on provisions and access to services for victims of GBV and TIP during a pandemic.

Types of services provided by shelter homes to TIP and GBV victims - Services for victims include shelter, psycho-social support, physical health care, nutrition, life skills, vocational training, economic security, education, identity documents, legal information and counselling, rehabilitation, repatriation, and others. Shelter homes are run both by the government and NGOs,

and services are provided to the victims either while they are staying in the shelter home or after they have been associated with certain NGO/OSCC after leaving the shelter home. Services and shelters remain available only for women victims and are not available to men and other genders.

4.2 Challenges in service delivery¹⁰

Barriers to service delivery - The research identified five important barriers to service delivery - i) NGO-run shelter homes and services don't receive on-time budget allocations under the government's Ujjawala and Swadhar Greh schemes; ii) Rehabilitation services are not comprehensive. Often rehabilitation is narrowly understood as "reunion with families", even if the victim doesn't have continued access to services in their places of origin; iii) Focus on economic rehabilitation and sustained income-generation is missing; iv) Service delivery is inherently complex. Navigating its complex requirements directly impacts their accessibility and effectiveness; v) Services don't meet acceptable quality standards. Interviews with stakeholders suggest that shelter homes, especially government-run shelters, often have poor living conditions and victims receive sub-standard food, clothing, hygiene, trauma-induced care, etc.

Victim's perception of services - Interviewed victims (both TIP and GBV) were generally satisfied with the services received at the shelter home or from NGOs but were dissatisfied with the services received from police and prosecutors. Victims highlighted a serious gap in rehabilitative services especially those that would help them achieve economic independence.

4.3 Rehabilitation and reintegration of TIP and GBV victims¹¹

Streamlined procedures - Shelter homes and NGOs were found to have streamlined procedures for rehabilitation and reintegration of both GBV and TIP victims, within their limited resources. The ITPA, 1956 is applicable for TIP (adult) victims of sex trafficking, and especially, where victims are in shelter homes, court orders decide the future course of action in consonance with the individual care plan of the assisting NGO. For child victims of trafficking, the Juvenile Justice Act, 2015 prescribes detailed procedures towards their rehabilitation through the Child Welfare Committees set-up under the Act.

Victims' preference for reintegration - GBV victims, mostly in case of domestic violence, are reluctant to file legal proceedings and often desire family rehabilitation. TIP victims for CSE have to stay in shelter homes during the court ordered duration and often due to lack of family acceptance. They either prefer to continue living in the shelter homes or get rehabilitated in communities with or without their families.

4.4 Criminal justice delivery in cases of TIP and GBV12

Challenges of investigation and prosecutions in TIP and GBV cases - Respondents reported several barriers to investigations and prosecutions, namely - lack

¹⁰ For details refer to section 4.4.3.2 in Chapter 4 of the full Report.

¹¹ For details refer to section 4.4.4 in Chapter 4 of the full Report.

of inter-agency coordination among law enforcement agencies and Departments of Women and Child Development and other welfare services in the Districts; lack of regional and international coordination in cases of foreign victims of trafficking towards their repatriation; uneven knowledge and training for law enforcement agencies on comprehensive coverage of TIP and GBV issues and their legal frameworks; gaps and anomalies in the relevant legislations; and lack of cooperation from victims, who often turn 'hostile' or disinterested due to delayed investigations or trials.

4.5 Integration or Separation of Services for GBV and TIP Victims¹³

After conducting 70 interviews (including victims), three different strands of opinions emerged from the field research on integration or separation of services for TIP and GBV victims: i) some respondents were in favor of integration of services, considering the commonality between the needs and experiences of TIP and GBV victims; ii) some of them suggested keeping the services separate considering that needs and experiences of both the victims are varied, and that the intensity of violence experienced by TIP victims differs from GBV victims; they however, suggested for possible integration of few services like legal aid and medical facilities; iii) another group of respondents suggested having separate services but keeping them under one common location for both GBV and TIP victims so that access to services becomes smooth and less time-consuming. The majority of the interviewed police officials suggested creating a common location under one roof for victims of TIP and GBV, with different departments operating and providing services (recording of statement before Magistrate, production before Child Welfare Committee, medical assistance, trauma-induced care/counselling, translator, compensation, etc.), which would make compliance with procedures easier for the police.

Understanding of integration - Respondents understood integration of services for TIP and GBV victims as - a) keeping both TIP and GBV victims in a common shelter, b) not differentiating victims, and c) integrating intervention. Structures could be designed building on the benefits of OSCCs. The common structure could link victims of different kinds of violence to appropriate services. The location would have different units operating within the same roof and reducing the challenges victims face in accessing the services.

Understanding of separation - Given the different needs and experiences of victims, interventions for TIP and GBV victims should also be kept separate. GBV victims may differ from one another in terms of the nature of violence suffered by them. But when compared to TIP victims, the needs of GBV victims would not be as extensive, especially those TIP victims rescued from commercial sexual exploitation. Common shelter homes would further stigmatize such TIP victims and therefore, they should be kept separate. Some of the interviewees also suggested time-bound interventions, i.e., to treat the victims of TIP and GBV separately for a few years and gradually integrate them into a common space for their further rehabilitation and reintegration into the society.

¹² For details refer to section 4.4.5 in Chapter 4 of the full Report.

¹³ For details refer to section 4.4.6 in Chapter 4 of the full Report.

MAJOR RECOMMENDATIONS

For the Government:

Coordination among different stakeholders

- Strengthen coordination at the government level between different ministries and departments relevant to TIP and GBV, and between the central and state governments for more coherent responses.
- Strengthen coordination between multiple stakeholders representing government and NGOs, and between the service providers and law enforcement agencies towards holistic responses to TIP and GBV cases, especially within the One Stop Crisis Centers.

Access to services

- Ensuring reach and access to services in small towns and rural areas, especially at the borders, in partnership with NGOs.
- Setting-up shelter homes where currently not available to ensure equitable geographical distribution depending on the scale of the problem.
- Ensuring reach and access to services in small towns and rural areas, especially at the borders, in partnership with NGOs.
- Setting-up shelter homes where currently not available to ensure equitable geographical distribution depending on the scale of the problem.
- Disbursing funds in a timely manner to shelter homes, and periodically monitoring and evaluating various schemes.

Separation of services

- Separate shelter homes for GBV and TIP victims, especially those rescued from commercial sexual exploitation; but integrate services at a common location, similar to the One Stop Crisis Centre model, under one roof.
- Integrate possible services for GBV and TIP victims, including those for medical treatment and legal aid.

For Service Providers:

Access to services

• Ensure reach and access of services in small towns, rural and remote areas, especially at border areas, in partnership with the government, by setting up more help centers/shelter homes.

Rehabilitation and reintegration

Implement an individual care and exit plan to enable victims availing shelter home services to move towards rehabilitation (especially economic) and reintegration within the community, either with or without their families, based on their participation in the process.