The International Human Trafficking of Syrian Refugees
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Introduction

This policy document, written during the spring of 2019, is the combined work of 24 high school juniors at the School for Ethics and Global Leadership (SEGL)—a semester long program located in Washington D.C. SEGL aims to provide intellectually motivated high school juniors who represent the diversity of the United States with the best possible opportunity to shape themselves into ethical leaders who create positive change in our world. The semester begins with students exploring various current events issues via week long case studies. Eventually, the class selects one specific international current events issue and creates a policy document in response. The class of Spring 2019 chose to address the issue of the international human trafficking of Syrian refugees. This topic was selected because while the general Syrian refugee crisis has received immense international attention, it is the belief of the class of Spring 2019 that the human trafficking of these refugees has not been sufficiently addressed. This document reflects the opinions of the students at SEGL, but not necessarily the opinions of its faculty. We hope this document addresses and explains the current status of internationally human trafficked Syrian refugees, the responses of various stakeholders, and provides direction for the future.
Executive Summary

The ongoing Syrian Civil War has forced 5.6 million Syrians to vacate the country, prompting an international refugee crisis. These refugees are left homeless and desperate to find safety, making them vulnerable to human trafficking. In their attempts to find safety, many refugees rely on smugglers to get out of Syria, leaving their lives in the hands of someone else. Promising safe passage out of the country, traffickers are able to take advantage of the refugees, often extorting more money from their charges once the journey has begun or by forcing refugees to perform involuntary labor or sex work.

The human trafficking of Syrian refugees is a humanitarian crisis that affects not only Syria but also the entire international community. This document will issue recommendations to the European Union and Turkey because the majority of Syrians who flee take refuge in these regions. The document will also provide recommendations to the United States, the United Nations and non-governmental organizations because all three of these groups hold international power and/or are major stakeholders in the issue.

The United States is addressing the issue of human trafficking in Syria by allocating 8.7 million dollars in foreign aid. Along with this, the Department of State and the United States Agency for International Development have written grants with the goal of providing humanitarian aid and discussing the problems of human trafficking diplomatically. These grants do not specifically allocate money to NGOs, which have direct access to areas where Syrian refugees are located, therefore rendering these grants less effective. To address this deficiency, the U.S. should create a grant specifically for NGOs, while also keeping the grant system that is currently in place. Second, the U.S. should respond by training refugee staff and members on how to identify victims of trafficking. Third, the U.S. should increase the funding to the State Department, specifically for the TIP report division. And finally, the current President of the United States, Donald Trump, should acknowledge publicly that the human trafficking of Syrian refugees is an international crisis.

As a result of the crisis, the European Union (EU) has faced the brunt of providing aid and resources to Syrian refugees. In addition, the EU has struggled to combat human trafficking within its borders. Although the EU has many policies in regards to providing aid to Syrian refugees and combating human trafficking, there is little intersection between the two. With these issues in mind, the EU must shift their focus inwards, towards the crisis at home by creating policies that address both Syrian refugees and the human trafficking of Syrians within EU borders. As such, our policy recommendations to the European Union are as follows: First, enforce the UN’s definition of “human trafficking” across all EU member states. Second, require all EU member states to enforce the Victims of Human Trafficking Law. Finally, shift the allocation of humanitarian aid funding towards the integration of Syrian refugees being human trafficked into European society through mental health support and job opportunities.

As a prominent member in the EU, Turkey takes in more Syrian refugees than any other country—largely because of its proximity to Syria and its location on the Balkan Route.
Due to economic challenges, many refugees are forced to work in the informal labor markets making them susceptible to human trafficking. The Turkish government has taken actions to combat the issue of human trafficking with motions passed such as the Palermo Protocols and the "Law on Foreigners and International Protection." However, there is still more that can be done. First, we propose the Turkish government request more funding in order to train, educate, and employ local police along the Balkan Route to recognize and intercept all kinds of human trafficking. We also suggest the Turkish government reistate and officially register NGOs concerning human trafficking prevention to operate in Turkey. Third, the Turkish government should grant refugee status to Syrian refugees. Finally, the Turkish government should increase the efficacy of temporary visas and work permits.

Beyond the borders of individual countries, the United Nations (UN) has worked to address human trafficking of Syrian refugees. Within the UN, the primary organization that focuses on the topic of refugees is the United Nations High Commissioner for Refugees (UNHCR). The United Nations Office on Drugs and Crime (UNODC) is chief among UN offices that addresses human trafficking. However, there is little to no communication between these two groups. As a result, the intersection of these issues is hardly discussed and those who are refugees and victims of trafficking are often neglected. Additionally, the guidelines that are in place to combat these issues—as discussed in the 1951 Refugee Convention—are rarely enforced. To combat these issues, the Secretary General of the UN should first create the position of Special Representative on Human Trafficking of Refugees and appoint an official to serve in that office. Second, the UNHCR should assign at least one staff member from each global field office to focus directly on human trafficking issues. Finally, the UN should ensure that refugee victims of trafficking are granted the protection of the principle of non-refoulement.

Outside of the realm of political organizations, non-governmental organizations (NGOs) in and around Syria play a vital role in the prevention of human trafficking through the services they provide: coordinating with the government, providing aid to victims of human trafficking, and fundraising. The ability of NGOs to do their work in and around Syria has been greatly prohibited in recent years as a result of heightened conflict within Syria and surrounding countries. Therefore international non-governmental organizations (INGOs) have the best potential of remedying many of the current issues faced by Syrian NGOs. For this reason, our policy recommendations to NGOs focus primarily on improving the relationships between NGOs and INGOs. INGOs must first prioritize the needs of NGOs that are the closest to the issue. Second, INGOS can make their training resources more accessible by ensuring that arabic options are available. Finally, INGOs must ensure that the individuals receiving training from INGOs will be able to effectively relay their training.

The five aforementioned groups—the U.S., EU, Turkey, UN, and NGOs—are all major stakeholders in the international human trafficking of Syrian refugees and will play crucial roles in addressing this—conflict. All five groups at this point in time have a unique opportunity to use their resources to address this international crisis. With this in mind, we have prepared the following policy document in the hope of providing stakeholders with realistic and effective responses.
Historical Background and Current Status of Human Trafficking of Syrian Refugees

Tucked away in the small Lebanese town of Jounieh is a hovel of a house with bars on the windows and guards at the door. Seventy-five Syrian women were smuggled from Syria to this decrepit house to escape the war in their country. Upon their arrival, they were forced into sexual slavery. Beaten, tortured, electrocuted, and flogged, these women endured forced abortions and rape for years until four women finally escaped and were able to find help.¹ This story is just one of many that illustrates the often-ignored cruelty of the human trafficking of Syrian refugees.

The ongoing Syrian Civil War has displaced 6.2 million people within the country and forced 5.6 million to vacate Syria, creating an international refugee crisis.² These refugees are left homeless and desperate, making them vulnerable to human trafficking, much of which happens during the transit out of Syria. Because they tend not to possess proper identification papers, refugees are forced to put their trust in smugglers who promise to transport them to Europe for a considerable sum, ranging anywhere from $3,400 to $6,800.³ Traffickers take advantage of this dynamic, often extorting more money from their charges once the journey has already begun, forcing refugees to perform involuntary labor or sex work to pay back their perceived debts.⁴ Refugees are easy victims for human traffickers because in many cases, they do not have anyone waiting for them in the country they are trying to reach, so no one reports their absences.⁵ In addition, more than half of the refugees are children, usually orphaned, leaving them with even less protection.⁶

This document will issue recommendations to the United States, the European Union, the United Nations, Turkey, and non-governmental organizations to address the crisis of human trafficking of Syrian refugees as these groups collectively have the power to prevent trafficking. Each party has a different and nuanced definition of the word refugee, presenting an additional challenge to coordinating responses to the crisis. Therefore, to provide clarity, this document will use the UN High Commissioner for Refugees’ definition of the term refugee, which states, “a refugee is someone who has been forced to flee his or her country because of persecution, war or violence. A refugee has a well-founded fear of persecution for reasons of race, religion, nationality or political opinion or membership in a particular social group. Most likely, they cannot return home or are afraid to do so.”⁷ All stakeholder countries include “reasons of race, religion, nationality or political

⁴ Ibid.
⁵ Ibid.
opinion or membership in a particular social group” in their definitions of refugees. The factors used to define refugee are similar to those that make people especially vulnerable to human trafficking, further exposing Syrians to this tribulation.

Human trafficking, for the purposes of this document, is defined by the UN as “the recruitment, transportation, transfer, harboring, or receipt of persons by improper means—such as force, abduction, fraud, or coercion—for an improper purpose including forced labor or sexual exploitation.” The U.S. Department of Homeland Security describes the circumstances that lead to human trafficking as “psychological or emotional vulnerability, economic hardship, lack of a social safety net, natural disasters, or political instability.” According to the United States National Human Trafficking Hotline, indications that someone has been trafficked include: not being able to move around as one wishes, having a pimp or manager and working in the commercial sex industry, being unpaid or severely underpaid, owing a large debt and being unable to pay it off, and being recruited through false promises concerning the nature and conditions of one’s work. The illegal and surreptitious nature of human trafficking makes it difficult to evaluate the amount of human trafficked Syrian refugees. Moreover, the varying technical definitions of refugee in different countries and number of unreported displaced peoples adds to the difficulty of estimating a range of human trafficked Syrian refugees. According to the Global Slavery Index, a report compiled by the Walk Free Foundation in 2018, at least 136,000 Syrians are slaves within the Gulf States. The Walk Free Foundation defines slaves as people in “situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.” While it cannot be directly extrapolated from this source how many of these Syrians are refugees, the source does portray the seriousness and pervasiveness of Syrian human trafficking.

Syrians wishing to leave the country have very few options, as nearly all of Syria’s neighbors have severely limited the number of refugees they will admit. Turkey has accepted the highest number of Syrian refugees but has also issued very few work visas, both flooding the legal labor market and forcing refugees into the shadow economy. The shadow economy—which is neither taxed, monitored, nor regulated—results in refugees being vulnerable to trafficking due to an inability to

10 Ibid.
13 Ibid.
15 Ibid.
report abuse to the police. In some host countries, like Egypt, Turkey, Lebanon, Jordan, and Iraq, 60% of Syrian refugees live below the poverty line, making them more desperate for work. Many choose to leave the Middle East entirely and turn to smugglers to get them illegally to Europe. Once they are in Europe, usually in Greece, the struggle to find jobs continues. Because of their undocumented status, migrants cannot report abuse to police without being arrested or deported, which makes them easy to extort and take advantage of. As former Secretary of State John Kerry once said, “Wherever we find poverty and lack of opportunity…we find not just vulnerability to trafficking, but zones of impunity where traffickers can prey on their victims.”

Refugees place a lot of trust in smugglers that can help them travel to Europe. These smugglers often serve as the closest thing to advisors or guides refugees will experience during their transition out of Syria. This unique relationship leaves them especially vulnerable to trafficking. According to a 2017 Harvard study, refugees “overwhelmingly expressed favorable views of smugglers and their handling of the migration; solidarity was often formulated in religious, ethnic, and even familial terms” in interviews with researchers. About half of the refugees interviewed found their smugglers in public spaces, like parks or train stations, while about a third of them found smugglers through recommendations from close friends or family members. Crucially, the 12% of refugees interviewed whose smugglers approached them were significantly more likely to be trafficked. None of the subjects of the study found their smugglers through the Internet.

The human trafficking of Syrian refugees is a crisis that not only affects Syria but also the international community. This document will issue recommendations to the European Union and Turkey because the majority of Syrian refugees live in those two regions. It will also issue recommendations to the United States, the United Nations and non-governmental organizations because those three groups hold international power in the treatment of the refugees. However, trafficking of refugees is a problem of broader global context, beyond the groups delineated in this document, because so much of it happens during the process of migration between countries. Mitigating trafficking is, therefore, not only Syria’s responsibility, but an international responsibility. The recommendations issued in the following document will focus on preventing further trafficking of Syrian refugees, rather than treating those already affected, because inhibiting the circumstances that allow human trafficking is the most effective way to address this issue. If enacted, these recommendations have the potential to curb the rising number of Syrian refugees who fall victim to human trafficking.

18 “Sex Trafficking and the Refugee Crisis: Exploiting the Vulnerable”.
20 Ibid.
21 Ibid.
22 Ibid.
United States Policy

Introduction

The resources allocated by the United States government dedicated to countering the crisis of human trafficking in Syria shows the United States’ ongoing leadership in the field of international aid and the contestation of acts that violate human rights. According to the Supporting the Future of Syria and the Region conference in 2017, the United States donated a total of 6.5 billion dollars from the beginning of the Syrian crisis in 2012. At the start of his presidency, Donald Trump’s Administration stated “stopping human trafficking [is] an Administration priority”. Currently, the government has the Office to Monitor and Combat Trafficking in Persons which produces an annual report describing the current conditions of trafficking around the world as well as the United States’ policy regarding trafficking in persons.

Financial Involvement

To address reports of human rights abuses, in 2018 the United States allocated around 870 million dollars to foreign assistance in Syria. The Office to Monitor and Combat Trafficking in Persons spends more than 300 million dollars on foreign assistance for 960 different anti-trafficking projects annually as part of their larger funding for the prevention of trafficking and its victims internationally. Another way in which aid is given is through grants and cooperative agreements from the government. The Department of State and United States Agency for International Development (USAID) write grants with two main objectives; to “prevent and respond to crises and conflict, tackle sources of fragility, and provide humanitarian assistance to those in need” and to “overcome global security challenges through diplomatic engagement and development cooperation”. There is no official amount of money set aside for non-governmental organizations (NGOs); although, there are many grants which NGOs may apply for. The Office to Monitor and Combat Trafficking in Persons currently has a posted grant which awards between 100 thousand dollars and 2.5 million dollars to any group working on human trafficking, but does not have any specific requirements as to where or with what population the group must be working.

Work with NGOs

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26 Ibid.


28 Ibid.

The United States government has a lasting relationship with non-governmental organizations (NGOs) when it comes to providing aid. NGOs play a large role in combating human trafficking in Syria, addressing issues ranging from prevention to the physical and mental wellbeing of trafficking victims. Money given to NGOs has been used towards the basic human needs of Syrian refugees such as food, shelter, education, and healthcare. NGOs such as the Violet Organization have "worked so far in six provinces (Idlib, Aleppo, Hama, Damascus, Latakia, and Homs) in the areas controlled by opposing forces", giving them unique access to and insight regarding the living conditions of the refugees. Many NGOs provide the humanitarian aid that the Syrian government is not currently focused on.

Existing Policy

In 2017, the United States passed a reauthorization of the Victims of Trafficking and Violence Protection Act (or TVPA) which aimed to eliminate human trafficking on both a national and international level. The focus of Congress was to create international and national programs that maintain regular supervision on the results and effectiveness of US anti-TIP policy; including the formation of criminal laws that combat the perpetrators of trafficking. Key parts of the TVPA include focusing on promoting data collection, improving victim services and establishing an office of victim assistance. The TVPA reauthorization of 2017 also includes an overall addition in transparency with “the number of confirmed human trafficking investigations by category, including labor trafficking, sex trafficking, and transnational and domestic human trafficking.” In June 2018, the Trafficking in Persons Report was released by the Office to Monitor and Combat Trafficking in Persons, and it continued to classify Syria as a tier three country; meaning Syria does not “fully meet the minimum standards for the elimination of trafficking and is not making significant efforts to do so”. That being said, the United States recommends that Syria should, “stop the forcible recruitment and use of child soldiers by government forces, pro-government militias, armed opposition forces, and designated terrorist organizations such as ISIS”. This report also addresses the abuse of children by terrorist organizations like the Kurdish and ISIS as well as the Syrian government. According to Mark P. Lagon and Nadia Murad Basee Taha through the Council on

33 Ibid.
35 Ibid.
37 Ibid.
38 Ibid.
Foreign Relations, a nonpartisan think tank, human trafficking often serves as a source of funds for terrorist organizations like ISIS.\(^{39}\)

**Recommendations:**

- The United States government should train refugee camp staff and members of the surrounding towns and communities on how to identify trafficking victims, following the suggestions set by the Department of State. This includes the refugee camp staff setting up workshops they can offer to all people so that refugees can make the most educated decision possible. The workshops would be staffed by local organizations that are supporting by hands-on tactics and the United States would provide a lesson plan on the type of education they use in the United States to prevent trafficking.

- The United States government should create a new grant in which non-profits and Non-Governmental Organizations operating on issues regarding human trafficking of Syrian refugees (in Syria or in the surrounding countries). The grant should have an award floor of 100 thousand dollars and an award ceiling of 1.5 million dollars. This application will ask the party applying for the grant about their goals, processes, and progress. This body will then select groups that uphold the goals of the Department of State and USAID in regards to responding to a crisis. This grant should require a detailed public report regarding where the money is spent and must be in compliance with the award provisions listed on the State Department website.

- The United States should increase funding to the State Department, specifically the division that creates the TIP report. This money should go towards the expansion of the recommendation section of the TIP report for countries ranked as tier three. The extension of funding in research would provide the United States with a better opportunity to expand on what it could be doing more to understand each country individually and how to help them locally. An example could be that an advanced report would address how the Syrian government would “proactively identify potential trafficking victims and provide them with appropriate protection services”\(^{40}\) rather than simply stating this like the current report does now.

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The sitting president, currently Donald Trump, should make a public announcement either through a press conference or social media post acknowledging human trafficking of Syrian refugees as an international crisis.
The European Union

Introduction

Since March 2011, the European Union has faced the issue of providing aid and resources to fleeing Syrian refugees. Over the course of the last eight years, about 1 million displaced Syrians have moved to Europe as either asylum seekers or refugees.\(^4^1\) In 2015 to 2016, 24 thousand sought asylum and were formally resettled as refugees in the European Union. In addition to the refugee crisis, the European Union faces the issue of human trafficking, with an estimated 20,532 registered victims in 2015 and 2016,\(^4^2\) 56% of whom (in cases where citizenship was known) were non-EU citizens.\(^4^3\)

Recognizing Human Trafficking

The European Union has described human trafficking as “a serious crime, often committed within the framework of organized crime, a gross violation of fundamental rights and explicitly prohibited by the Charter of Fundamental Rights of the European Union.”\(^4^4\) With such a prohibitive definition of human trafficking, and yet a failure to sufficiently combat the effects of human trafficking in EU member states, it is obvious that the EU must adopt new measures—not only as a means to protect its own citizens, but to also ensure the safety of Syrian refugees.

Lack of Obligatory International Standards

The European Convention on Human Rights (ECHR)—founded in 1949 as an intergovernmental organization aiming to uphold the principles of human rights and political freedoms—states, 1: “No one shall be held in slavery or servitude” 2: “No one shall be required to perform forced or compulsory labor.”\(^4^5\) However, because the Council of Europe is unable to implement binding laws unlike the European Union, member states of the European Convention are not required to act in accordance with human rights obligations. The laws are insufficient such that they cannot be enforced universally among EU member states. Compulsory laws—rather than merely prescriptive, nominal standards—are necessary for addressing an issue as international and as destructive as human trafficking.


\(^4^4\) Ibid.

Disparities in policy among EU member states are reflective of respective immigration of Syrian refugees. Germany, for instance—which has accepted more Syrian refugees than any other EU member state—has a far greater interest in the issue of human trafficking than its EU counterparts. Consequently, they will be more focused on allocating funds towards the crisis, rendering disparities in relation to other member states. Once again, a universal approach among EU constituents is required to address the issue effectively.

With an unenforceable definition of human trafficking and disparities among EU member states interest in the issues, a universal approach among EU member states to combat the crisis is difficult to obtain. In order to move towards a universal approach to the issue in the EU, an enforceable definition of human trafficking that is the same for all member states is a requirement. Through this, member states with varying interest in the issue will be forced to come together as one collective unit towards proportionally pooling their resources to end the crisis. Given the UN’s long history of activity on the global stage in working to maintain international peace, its definition should be enforced across all EU member states.\textsuperscript{46} By having an enforceable definition from a reputable international organization with a legitimate stake in the crisis, EU member states will be better equipped to unite as one unified body.

**The Nordic Law - A Model For The Victims Of Human Trafficking Law**

The Nordic Law legally targets “buyers and third-parties” involved in the international market of human trafficking. The law is designed to protect victims while establishing a legal precedent against human trafficking perpetrators. Although the Nordic Law is specifically tailored for reducing prostitution, it has been proven to decrease rates of domestic human trafficking.\textsuperscript{47} It is hereby recommended that the EU adopt the Victims Of Human Trafficking Law (VOHT), a piece of legislation designed to protect victims, to ensure their domestic safety and security, to provide them with financial resources and economic opportunity, and to further criminalize their respective perpetrators. Currently, non-EU citizens victims of human trafficking may acquire permanent residency in Europe only if their traffickers had received prosecution and sentencing.\textsuperscript{48} The VOHT would continue this policy in addition to providing legal support for non-EU citizens who appeal for victimhood status to ensure a greater probability of criminal prosecution for perpetrators.

**Current EU Efforts - Funding**

As of 2015, the annual budget of the European Union is approximately €145 billion ($163 billion), comprising about 1% of the wealth generated by EU economies every year. Of this annual budget, 1.6 billion euros (1.8 billion dollars) will be allocated towards humanitarian aid in 2019 with 860 million euros (970 million dollars) being allocated specifically to the Syrian Crisis.\textsuperscript{49} Humanitarian aid


constitutes a fraction of the EU’s entire budget; simply administering 0.01% of its budget—in the words of Christos Stylianides, EU Commissioner for Humanitarian Aid and Crisis Management—places the EU as “a leading humanitarian donor in the face of crises such as Syria and Yemen.”

Allocation of Humanitarian Aid Within The EU

This allocation will then be used by UN agencies, non-governmental organizations, and the Red Cross Family to actually implement and provide the necessary aid. As an assurance, the European Commission closely monitors the usage of EU funding through its global network of humanitarian experts and specific rules it has in place to ensure funding is well spent. The problem that arises isn’t that the EU is not spending enough in resolving the crisis, but that the organizations in question have insufficiently addressed the issue. There should be a focus on domestic human trafficking and the EU’s ability to integrate victims into society through mental health support efforts and job opportunities. The tragedy of human trafficking leaves victims unable to control where they end up. EU member states should support their integration into society as it would serve as both a boost to their economies and help to mitigate conflicts that may arise from Syrian refugees becoming disheartened with European society.

Recommendations

- Enforce the UN’s definition of “human trafficking” across all EU member states.

- Require all EU member states to enforce the Victims Of Human Trafficking Law (VOHT) which provides victims the ability to report violations of human trafficking without fear of prosecution.

- Shift the allocation of humanitarian aid funding more towards the integration of Syrian Refugees being human trafficked into European society through mental health support and job opportunities

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51 Ibid.
The Prevention of Trafficking of Syrian Refugees Through and in the Republic of Turkey

Introduction

As refugees migrate across the world, Turkey, the bridge from Europe to Asia, is a major path for travel. These refugees, desperate for safety and survival, are often exploited and trafficked along their journey and in their new homes. The Turkish government has significant influence over the fate of Syrian refugees and in turn has great ability to prevent their trafficking.

Geographic Routes and Classification of Refugees

Syria shares the entirety of its northern border with Turkey. Aleppo, Syria’s largest city and a major source of refugees, lies just thirty miles away from it. According to polls taken by the social enterprise Seefar, two thirds of Syrian refugees in Turkey wish to stay there for an extended amount of time. However, the Turkish government does not grant refugee status to Syrian refugees. Turkey is only compelled to give refugee status to migrants fleeing European events that began before 1951, which does not apply to displaced Syrians or most other asylum seekers. Syrian refugees are given temporary protection, which does not punish them for illegal immigration into the country and allows them to reside there as long as they do not stay indefinitely. With no choice but to leave eventually, Turkey instead becomes a transit country. It loses its potential as a home for these migrants, instead becoming just a way station along the road to Germany, Sweden, or other countries that accept large numbers of Syrian refugees. While temporary protection does help Syrian refugees flee Syria safely, it forces them to continue moving through Europe, leaving them vulnerable to human trafficking.

A glaring point of this vulnerability is the trafficking industry in Istanbul. The city is a major point on the Balkan Route, a path Syrian refugees often take by land or sea to Greece, and north through Europe. Along this journey, they are often trafficked, smuggled, and exploited. The trafficking industry has flourished as a result of Turkey’s geographic location and economic incentives. The human trafficking problem in Turkey is evident in their June 2018 global ranking as a Tier 2 country. A Tier 2 country is defined as a country “whose governments do not fully meet the Trafficking Victims Protection Act’s (TVPA)’s minimum standards, but are making significant efforts to bring themselves into compliance with those standards.”

Vulnerability of Syrian Refugees to Human Trafficking

52 “Return, Stay or Migrate? Understanding the Aspirations of Syrian Refugees in Turkey” SeeFar, 2018.
Currently, the most vulnerable and susceptible group to human trafficking are Syrian refugees. According to the State Department and the government of Turkey, they create the largest group of people trafficked (86 out of 303 identified victims in 2017). This is a growing figure from 36 identified victims in 2016. The International Organization for Migration reported that between the years of 1999 and 2003 over 250 thousand people were trafficked through Turkey, making the numbers reported by the State Department and other authorities even more doubtful.

Due to its underground nature, it’s difficult to know the exact number of victims of human trafficking in Turkey. Turkish authorities currently have limited ability to effectively aid victims and prosecute traffickers. For example, the government of Turkey tends to focus on sex trafficking, excluding other aspects of trafficking from legislation and law enforcement. This leaves public servants and officials ill-equipped to combat the problem. Furthermore, following the 2016 attempted coup, large numbers of shelters for victims of human trafficking run by NGOs were shut down. In addition, 100 thousand workers were suspended, fired, or arrested because of their alleged allegiance to the coup. 8,777 law enforcement officials lost their jobs in the immediate aftermath of the coup and more have been punished since. This created a lack of resources for victims and a lack of training for Turkish police officers responding to reports of human trafficking.

How Human Trafficking occurs

High rates of human trafficking are mostly caused by traffickers posing as people that the prospective victims know. For example, they can appear as friends, significant others, or relatives, or who provide refugees with fake identification and lure them to lives consisting of better jobs or housing. In one instance, a sixteen year old girl traveled to Turkey with an acquaintance promising her a job as a waitress. However, instead of being brought to the job interview, she was sold to a pimp in Istanbul.

Existing Responses to Human Trafficking by the Turkish Government

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58 Ibid.
64 Ibid.
Currently, Turkey is attempting to combat human trafficking within its borders. For example, the ratification of the Palermo Protocols by Turkey in March 2003\(^65\) impacted the way traffickers are recognized, punished, and prevented from future trafficking.\(^66\)

In 2013, Turkey adopted the “Law on Foreigners and International Protection” which created a legal definition of human trafficking and a way for victims of trafficking to be eligible for a specialized residential permits.\(^67\) Turkey is also contributing a two-part initiatives called “Victim Support Program and the Voluntary and Safe Return Program.” Both offer to help victims obtain short term visas, residential status, and work permits, however, these efforts have affected the lives of relatively few refugees and have increased their vulnerability to trafficking.

**Syrian refugees and Trafficking**

Though there are approximately 3.6 million Syrian refugees currently in Turkey, only 27,930 work permits were granted in the last 2 years.\(^68\) Work permits are necessary as the majority (90%) of Syrian Refugees do not live in refugee camps, and therefore have more access to the labor markets and economy of Turkey.\(^69\) Approximately one third of the Turkish economy is based on informal employment, within which an estimated 1.5 million Syrian refugees work.\(^70\) In a system where so much of the labor is unregulated, it is difficult to determine the extent to which exploitation and child labor is prevalent. Evidence suggests that Syrian refugees, most specifically female or child refugees, are the most vulnerable to trafficking under the guise of informal labor in Turkey. Children and women often work in the streets selling flowers, begging, and collecting garbage making it easy to either forcibly take them or manipulate them.\(^71\) This becomes an increasingly important issue that Turkey has been attempting to deal with, but has not been directly addressed.

**Attention and Recognition**

Combating human trafficking in Turkey is dependant on explicit attention towards both the effects of migration and the informal labor market. Human smuggling through the Balkan Route is a byproduct of the Syrian Refugee Crisis which can and must be addressed by the Turkish authorities. There also must be a recognition of the millions of Syrian Refugees living in Turkey. There is a growing discontent among the Turkish population resulting from the influx of Syrian Refugees. This has limited the extent to which Turkey has integrated asylum seekers into their society and economy and in turn has created more opportunities for human trafficking.

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\(^{66}\) Ibid.

\(^{67}\) “Turkey on Trafficking in Human Beings” Republic of Turkey Ministry of Foreign Affairs.

\(^{68}\) “Access to the Labour Market.” [Access to the Labour Market - Turkey | Asylum Information Database.](https://www.asylum求解.org/database/)

\(^{69}\) UNHCR Turkey Factsheet - October 2017 - Turkey," ReliefWeb, October 11, 2017, , accessed April 05, 2019.


\(^{71}\) United States Department of State, 2018 Trafficking in Persons Report - Turkey, 28 June 2018, available at: [https://www.refworld.org/docid/5b3e0a4fa.html](https://www.refworld.org/docid/5b3e0a4fa.html) [accessed 15 April 2019].
Conclusion

The Turkish government has tried to prevent the crimes that are being committed to these vulnerable asylum seekers, but to little avail. The current system is clearly not working as effectively as it could be, and it is time new strategies are explored to combat the trafficking of people seeking only safety and a better life.

Recommendations

- Request more funding from the UN, outside sources, and the Turkish government, in order to train, educate, and employ, local law enforcement along the Balkan Route to recognize and intercept all kinds of human trafficking.

- Reinstate and officially register NGOs to operate with and in Turkey concerning human trafficking prevention.

- The Turkish government should grant refugee status to Syrian refugees.

- The Turkish government should centralize and increase the efficacy of temporary visas and work permits.
The United Nations’ Response to the International Human Trafficking of Syrian Refugees

Introduction

The United Nations (UN) is a large, international organization that includes representatives from almost every country, and because human trafficking is by definition global in scope, the UN is in a prime position to coordinate efforts to counter the practice across borders. The UN has also played an active role in the crisis in Syria, making it an appropriate organization to tackle the human trafficking of Syrian refugees. However, a lack of coordination between the UN’s responses to trafficking and the refugee crisis have created a situation where the unique position of refugees who have been trafficked are not being taken care of.

United Nations’ Efforts

The primary UN office that handles counter-trafficking efforts is the United Nations Office on Drugs and Crime (UNODC). Chief among their counter-trafficking programs is the Global Initiative to Fight Human Trafficking (GLO.ACT), which is a joint initiative between the European Union and UNODC that focuses on the prevention of and response to trafficking.72 The UN also includes the United Nations Global Initiative to Fight Human Trafficking (UN.GIFT), an initiative founded by a partnership between a number of UN offices, including UNODC and the International Organization for Migration (IOM).73

The Problems

Separately, the United Nations High Commissioner for Refugees (UNHCR) is the primary UN organization dedicated to protecting and assisting refugees worldwide, with a primary goal to ensure that all refugees can seek asylum and find security in a new state.74 The issue of human trafficking, however, is mostly outside of its purview, and it handles such topics only when they directly come to affect refugees.75 As a result, most UNHCR field offices do not have a staff member dedicated to trafficking issues, and even among those that do, such personnel spend only 5% of their time working on issues pertaining to trafficking.76

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Further, UNHCR is not part of the steering committee of UN.GIFT,\(^77\) which is just one symptom of a larger problem with the UN’s approach to the human trafficking of refugees: although there are efforts to aid both victims of trafficking and refugees, there are few to no formal or effective means of collaboration between offices and efforts dedicated to helping those that are both a refugee and a victim of human trafficking.\(^78\)

**Funding of a Possible Solution**

This lack of coordination would be best resolved by the appointment of a Special Representative dedicated to combating issues central to the intersection of the refugee crisis and human trafficking. The position of Special Representative would be able to act as a point person between groups such as UNHCR and UN.GIFT, which, in turn, would help to combat the problem of disconnection.\(^79\) This strategy would, of course, require funding; specifically, the creation and appointment of a new Special Representative would require a total of 400 thousand dollars, including a salary of 115 thousand dollars (the average salary for a special representative of this nature), as well 285 thousand dollars for general funding (which is the average general funding for an office of similar nature).\(^80\)

Currently, there are two main peacekeeping missions directly related to Syria, one of which is the United Nations Disengagement Observer Force (UNDOF), located in the Golan Heights, which is charged with maintaining the ceasefire between and supervising the disengagement of Syrian and Israeli forces. The UNDOF has been largely successful in this mission, as there has been little recent violation of the ceasefire.\(^81\) With their success to this point and a decreasing need for the mission, the entirety of its 60.2 million dollar budget is no longer necessary.\(^82\) As such, 400 thousand dollars can be safely diverted from the UNDOF to fund the creation of the Special Representative’s office, especially considering that such a sum comprises only about 0.66% of the UNDOF’s budget.

In addition to the connection of groups and organizations, fostering the connection and discussion between member states would help to unify efforts against trafficking. One way to foster discussion is to provide the relevant data on the topic, and then foster a space for discussion. One forum for such discussion would be the creation of a debate within the Security Council on the Trafficking in Persons in Conflict Situations.\(^83\) Additionally, this would provide a space for the denouncement of

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human trafficking, in an attempt to counter the small, but increasing effort to normalize human trafficking by traffickers and to impede desensitization.84

Refoulement and Human Trafficking Victims

Finally, one of the clearest manifestations of the lack of applicability of anti-trafficking efforts is how refugee victims of trafficking are or are not granted the standard protections given to refugees. Among UNHCR’s responsibilities is the enforcement of the 1951 Convention Relating to the Status of Refugees, which outlines the rights of refugees and the protections that the 145 signatories of the agreement are obligated to afford to them. Chief among those assurances is the principle of non-refoulement, which protects refugees from being returned to their countries of origin because they have a fear of persecution in those countries.85

One of the UN’s main response efforts for victims of trafficking, however, is to provide shelters, both in destination countries and in countries of origin. However, the former type of shelter is rarely used, as trafficking victims electing to stay in a shelter tend to be returned to such shelters in their home country.86 In the case of refugee victims of trafficking, such a practice would violate the principle of non-refoulement, because it entails refugees being returned to their home countries. In order to ensure that refugee victims of trafficking are able to enjoy the safety afforded to them by the principle of non-refoulement, it must be made clear that anti-trafficking efforts cannot and must not prevent victims from accessing standard refugee protections such as non-refoulement.87

Recommendations

- The Secretary General of the United Nations should create the position of Special Representative on Human Trafficking of Refugees and appoint an official to serve in that office. 400 thousand dollars should be diverted from the budget of the United Nations Disengagement Observer Force to fund the creation of the office.
  - The Special Representative on Human Trafficking of Refugees should create and present an annual report on the human trafficking of refugees to the UN Security Council Open Debate on Trafficking of Persons in Conflict Situations in which, it provides information about, and denounces, the human trafficking of refugees.

• The United Nations High Commissioner for Refugees should appoint at least one staff member from each global field office to focus on human trafficking issues, including the training of other staff in the identification of human traffickers and their victims and the collection of data on human trafficking patterns.

• The United Nations should ensure that refugee victims of trafficking are granted the protection of the principle of non-refoulement (as enumerated in the 1951 Convention Relating to the Status of Refugees), including ensuring that victims staying in shelters are not sent to shelters in their home countries.
Recommendations to Improve the Work of NGOs and INGOs on the Human Trafficking of Syrian Refugees

Introduction

Non-governmental organizations (NGOs) are organizations or institutions, generally not-for-profit, that focus on “vulnerable and marginalized populations.” In the context of human trafficking, NGOs specialize in different aspects such as coordinating with governments, providing aid to victims of human trafficking, and fundraising. This work provides Syrians with the security that is necessary to prevent human trafficking and to mitigate its effects. The following document will outline the ways in which domestic NGOs, operating in Syria and Turkey, and International NGOs (INGOs) can do this work more efficiently and effectively, thus decreasing the overall threat of human trafficking of Syrian refugees.

Limitations of NGOs

Currently, there are 127 registered NGOs and 19 registered INGOs operating in Syria though estimates range from 300 to 2,000 NGOs because many Syrian NGOs remain unregistered. The lack of registration and wide estimation range of the number of Syrian NGOs comes from the administrative difficulties faced by NGOs. The Ministry of Social Affairs and Labour (MoSAL) requires a lengthy registration process of all NGOs that can take upwards of two years. As well, intense government oversight of NGOs in Syria, as well as in surrounding countries such as Turkey, makes it hard for NGOs to operate at full capacity. On July 2016, a coup against President Recep Tayyip Erdogan led him to respond by firing government officials, shutting down independent newspapers, and imposing steeper restrictions on local and international nonprofits, especially American ones. This limits the ability of NGOs such as Mercy Corps, which was expelled on March 2017, to care for Syrian refugees. Before the Turkish coup d’etat in 2016, there were many well established NGOs that had successful relationships with local governments. Remaining INGOs

94 Stephanie Nawyn and Nur Banu Kavakli Birdal, Counter-Trafficking Policy and Immigrant Rights in Turkey (Turkey: Insight Turkey, 2014).
and NGOs within Turkey serve four main purposes: registration, legal assistance and reparation, education and language, and employment and livelihood.\textsuperscript{95}

**Funding for NGOs**

In 2016, 18\% of NGOs reported having received funds from domestic sources only, while 43\% reported that they had received funds from both domestic and foreign sources. The remaining 39\% reported receiving funding from foreign sources only.\textsuperscript{96} NGOs in Syria, under the Law of Associations (1958), are required to obtain government approval before establishing contact with international groups or receiving international aid. Limited relations with international institutions greatly limits fundraising opportunities for local Syrian NGOs.\textsuperscript{97} One of the main sources of international funding to local NGOs comes from INGOs that operate in Syria with the recognition of the government. INGOs play a vital role in that they are often better equipped to lead large fundraising campaigns as well as coordinate with donors around the world. “The need to minimise harm to affected populations… and the reputational and financial risks arising from weak capacities, and strengthening emerging Syrian civil society” are also goals of INGOs’ capacity building efforts.\textsuperscript{98} Many NGOs cannot access large scale institutional sources of funding, such as the EU humanitarian donor ECHO (European Civil Protection and Humanitarian Aid Operations).\textsuperscript{99}

**Successes of INGOs and NGOs in Syria**

The Syrian NGO Alliance is an organization of eighteen Syrian NGOs, both national and international, that “[supports] and [leads] humanitarian activities inside Syria and neighboring countries.” The current members of the alliance are leading NGOs in Syria whose operations provide services such as education, food, and security to Syrian citizens and refugees. Such work provides more stability to refugees thus decreasing their likelihood of being trafficked.\textsuperscript{100} Domestic NGOs and INGOs both play vital roles in the prevention of the international human trafficking of Syrian refugees. Unfortunately, domestic NGOs within Syria are poorly equipped and thus have great difficulty operating in a war torn country.


Many prominent INGOs also work in Syria such as the International Rescue Committee (IRC) and Human Rights Watch (HRW).\textsuperscript{101} Such INGOs work to improve the lives of all Syrian refugees. Specifically, the IRC focuses on the increased risks that women and children face in Syria.\textsuperscript{102} The IRC has provided both humanitarian aid and emergency relief to Syrian refugees. Such INGOs give Syrian refugees aid by partnering with people from the local population to provide a constant flow of capital, medicine, and equipment.\textsuperscript{103} Even though many local Syrian organizations are severely underfunded, they are usually more successful because they are both more aware of and better connected to the problems in Syria now. Syrians also know the needs of their people best. NGOs like the Shafak Organization was established by Syrians to address the needs of Syrians with “dignity, equality, and humanity.”\textsuperscript{104} While INGOs are better funded, local NGOs have had greater success targeting specific communities.\textsuperscript{105}

**Downfalls of INGOs and NGOs in Syria**

A relatively small number of INGOs are physically present in the most insecure areas, and too many international humanitarian actors continue to focus on relatively safe areas in volatile contexts or subcontract assistance. Human trafficking prevention work is most effective when operated in close proximity with individuals who are at a high risk of being trafficked, so operating via remote management limits the impact of INGOs.\textsuperscript{106} There is an INGO presence within Syria, however it is not significant enough and more can be done on the part of INGOs to bolster the work of Syrian NGOs.

Sources of training for Syrian NGOs are not sufficiently equipped to cater to the needs of Syrian NGOs. Organizations such as the Danish Institute, the Said Foundation, the Aga Khan Foundation, the British Council, the Dutch Institute, SEBC, and the EU have provided some capacity for NGO development in recent years, but training opportunities remain limited.\textsuperscript{107} NGO trainings typically consist of short courses in specific aspects of the project management cycle, emphasising proposal writing and fundraising. Currently, many INGOs struggle with low employee retention rates as a result of general lack of resources. Many of these courses were held in Damascus but failed to address the practical aspects of work in Syria.\textsuperscript{108}

**Recommendations**

- Promote collaboration between small NGOs and large INGOs and international organizations. INGOs must prioritize the needs of their partner local NGOs and communicate directly with them. They can do so by better coordinating and focusing their

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\textsuperscript{102} International Rescue Committee Staff, *Syria Crisis Briefing* (New York: International Crisis Committee, 2019).

\textsuperscript{103} Ibid.

\textsuperscript{104} Shafak, *Gender Based Violence Project* (Turkey: Shafak, 2019) https://www.shafak.org/site/node/82.

\textsuperscript{105} Ibid.


\textsuperscript{108} Ibid.
efforts to prevent human trafficking. INGOs must operate based off of the needs of domestically based NGOs. Promoting collaboration can be carried out via the bolstering of The Syrian Alliance of NGOs.

- INGOs must better the resources offered to local NGOs in Syria. They must offer information on NGO management that is available in Arabic. They must also increase grants to allow Syrian NGOs to receive training from larger more established INGOs as well as to better pursue an anti-human trafficking agenda.

- INGOs and other established international organizations must assist local NGOs with how to effectively work in areas of crisis like Syria. Many NGOs focus on the Syrian refugee crisis in Syria and throughout neighboring countries. Such NGOs would greatly benefit from trainings by INGOs focused on human trafficking so that they are better prepared to recognize the signs of and respond to potential human trafficking.
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