
A STUDY ON HUMAN TRAFFICKING IS A MODERN MANIFESTATION OF SLAVERY: A CRITICAL STUDY

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ABSTRACT

Human trafficking is a pervasive issue in every nation. The infection is so severe that noncompliance with the legislation constitutes a violation of any state's sovereignty. Trafficking erodes an individual's fundamental rights and weakens a nation's ethical and moral principles. It is a pervasive problem that consistently infringes on rights and perpetuates a cycle of pain. People often compare trafficking to contemporary slavery, which includes practices like bonded labor, prostitution, domestic servitude, and various forms of coerced work. Human trafficking has a pervasive impact on every aspect of society and industry. The prevalence of trafficking necessitates a reduction through the collective efforts of both national and international law enforcement agencies. The incidence of human trafficking is increasing on a global scale. Various constructions are utilized. Victims are coerced into collectives where they are compelled to work without remuneration, while others are placed in circumstances that prevent them from seeking assistance, thus sealing off any means of escape.

Human trafficking has been prevalent in ancient India, even though it has seen a recent increase. Until recent decades, its scope was limited to national boundaries, but it has since expanded globally. It impacts both the transit areas and the countries of origin and destination. This study explores the phenomenon of contemporary slavery, often known as human trafficking. It includes further violations of public transportation.

Keywords: Human Trafficking: contemporary slavery: socioeconomically

1.1 INTRODUCTION



Source- "Forbes India"¹

To understand the phenomena of human trafficking we must go through the history to understand the problem in the modern days. In Indian society birth of a son is celebrated while birth of a daughter is not praised enough since the Vedic era. Patriarchy is so deeply rooted in the families that females were always under the domination of males as father, brother or a son. Even during older days women were preferred to be kept at home and only given an understanding of Puranas and Smritis whereas men were sent gain expertise in education. A woman after getting married was supposed to serve her husband and if she deviates then she shall suffer the consequences. When the husbands lost in a battlefield the wives to protect themselves from becoming slaves of the opponent, self-sacrificed them.

¹ Rajasthan, Odisha, Maharashtra among the top five states with most human trafficking victims, available at: <https://www.forbesindia.com/article/news-by-numbers/rajasthan-odisha-maharashtra-among-the-top-five-states-with-most-human-trafficking-victims/73107/1>, accessed on 10-06-2023

Primarily women have suffered violation of their human rights since the older days. Women were subjected to flesh trade was prevalent even during the Vedic era. As the time passed women became a commodity for the male dominating world. An instance from Mahabharata where Draupadi was used as a prize of the bet is a clear depiction of a women's objectification. Devdasi system was practiced all over the states of India where a girl was dedicated to the temple. Some people took a vow to dedicate their first born daughters to the temple if their wishes are fulfilled. This practice made exploitation of girls unchallenging. As soon as Britishers took charge in India, women were not only exploited by the local men but they were also presented as a reward to those who visited the country as a foreign national.

Trafficking is linked to other wrongs such as smuggling, prostitution, bonded labour and other ways by which exploitation of human beings can be committed. The states have enacted various legislations to curb the menace of trafficking but what is to be reassessed is the association of anti-trafficking laws with the rehabilitating asylums, shelter homes, cross border laws which are quite liberal in nature. "The rationale behind it is to easily identify and locate the victims and rehabilitate them to protect them from getting trafficked by professional smugglers over and over"².

Human trafficking is an utter violation of human rights. The most susceptible category to trafficking is that of women and children. These are the victims who generally belong to the under developed or emerging nations. They fall prey to such methods while hunting for money sources in the developed nations or because to the rising demand in the trafficking sector. The perpetrators are more drawn to partake in trafficking since its consequence involves a large cash reward. people trafficking is usually mistaken with people smuggling. The latter ends when the person reaches the target and it might be consensual but the former is never consented and exploitation continues even after the person has reached the destination consequently, it is an ongoing trauma to the victims.

Traffickers are increasingly drawn to India due to its interconnectedness with other nations engaged in smuggling and trafficking through maritime and terrestrial channels, including Afghanistan, Bangladesh, Myanmar, and Nepal. Additional factors contributing to the rise in human trafficking instances include insufficient migration legislation and punitive measures

² Maggy Lee (ed) Human Trafficking, 1-26 (Willan Publishing, Devon, UK, 2007)

for traffickers, corruption exacerbating poverty, and a general lack of knowledge among the populace.

2.2 Defining trafficking in persons

To begin with, human trafficking is defined as "a criminal practice of exploitation of human beings where they are treated as commodities for monetary gain and are subjected to long-term abuse after being trafficked."³ Human trafficking emerged as a separate crime in 1990s when the scholars attempted to give a proper definition to this term. However, the most exhaustive definition was given in the "United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially women and Children, 2000" commonly known as PALERMO Protocol. Article 3(a) of the said protocol defines the term human trafficking as "The recruiting, transportation, transfer, harboring or receiving of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or of a vulnerable position, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation," is defined as "the exploitation of people."⁴ One of the main components of human trafficking, exploitation, is defined in the Palermo protocol as well. The statement reads as follows: "At the very least, exploitation should involve the exploitation of other people's prostitution or other sexual exploitation, forced labor or services, slavery or practices related to slavery, servitude, or the removal of organs."⁵ The word exploitation is being focused in the definition with respect to trafficking of women.

The Palermo Protocol defines human trafficking in a broad sense. "It covers not only the transportation of a person from one place to another, but also their recruitment and receipt so that anyone involved in the movement of another person for their exploitation is part of the trafficking process," as Sarkar explained.⁶ The definition supplements forced labour and other practices of slavery and not limit the scope of trafficking till sexual exploitation. "As per some scholars the people who migrate from one place to another in search of labour performed in

³ Siddhartha Sarkar, "Rethinking Human Trafficking in India: Nature, Extent and Identification of Survivors" 103(5) The Round Table, 285 (2014)

⁴ United Nations, United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children. (New York, United Nations, 2000), available at: <https://www.ohchr.org/en/professionalinterest/pages/protocoltraffickinginpersons.aspx>, accessed on 10-03-2024

⁵ Id.

⁶ Siddhartha Sarkar, Rethinking Human Trafficking in India: Nature, Extent and Identification of Survivors" 103(5) The Round Table, 485 (2014)

agriculture, construction etc but are deceived in made to work under undesired conditions can also be taken under the ambit of trafficking”⁷. The definition provides a wider understanding of trafficking as earlier it was limited to trafficking in women but the international definition discussed in the protocol in wider terms covers men, women, boys and girls. Apart from trans-border trafficking the definition also incorporates the trafficking within the boundaries of the nation and between the states. It also establishes a distinction between migrant smuggling and human trafficking. Former is done for earning profit by illegal labour while the latter is mainly implies exploitation.

2.3 Indicators and Causes of Trafficking

2.3.1 Slavery

“Slavery is often conceived as an embodiment of human trafficking by certain scholars”⁸. Human trafficking in its most miserable form of exploitation may be termed as slavery. The close association between slavery in ancient time and the present time is pertinent to be discussed before moving forward. Unlike the older days the slaves are not kept in chains and exploited till the end but the miserable conditions they are kept in are not any less. The scholars contemplate trafficking as contemporary slavery, “is marked not by legal ownership of one human being by another or long-term enslavement, but by temporary ownership, debt bondage, forced labour and hyper-exploitative contractual arrangements in the global economy”⁹

2.3.2 Prostitution

The sexual exploitation or prostitution also plays a major role in trafficking of women and children. Although they are traded under other realms such as domestic labour, agriculture etc but trafficking for the purpose of prostitution tops the list as identified by numerous National and International treaties. Additionally, some critics have contended that anti-trafficking policies have been utilized more to control and punish female migrants and sex workers than to rescue women from exploitation. They have also called attention to the "criminalization and

⁷ Id.

⁸ Kevin Bales. *Understanding Global Slavery*. (Berkeley, University of California Press, 2005); and D. Ould. “Trafficking and International Law”, in C. van den Anker (ed.) *The Political Economy of New Slavery*. (Basingstoke, Palgrave Macmillan, 2004).

⁹ Maggy Lee (ed) *Human Trafficking*, 3 (Willan Publishing, Devon, UK, 2007)

moralizing tenancies of the abolitionist discourse about sexual slavery." It is among the most common types of human trafficking.

2.3.3 Organized Crime

The role of mafia and gangsters in human trafficking along with the cross border control has devised human trafficking as an organized crime. The United Nations Convention against Transnational Organized Crime 2000 has regulated the notion of "trafficking as organized crime"¹⁰. The network of organized crime involves bureaucrats and politicians holding high positions hence the victims are difficult to be traced and rescued. This can be understood as a loophole in the system and trafficking being the substantial threat to the security of one's nation. It validates "state's increased surveillance and tighter immigration controls"¹¹. The relationship between agents is as widespread as it is considered one of the significant profit-making international businesses.

2.3.4 Poverty

Poverty is an age old problem in India. As per the statistics approximately 28.5 percent of total population is comprised of people living below the poverty line. United Nations (hereinafter referred to as UN) in one of its report stated that over "one quarter of world's under nourished population, one third of world's underweight children and nearly one third food insecure people"¹² are residing in India. 85 percent people belonging to the tribal communities have settled down in states like Bihar, Chhattisgarh, Jharkhand, Madhya Pradesh, Odisha, Uttarakhand and Uttar Pradesh. "According to a survey these states fall under the category of poor states"¹³. The rising rate of population in India is the core reason of decline in per capita income.

India signed the Millennium Declaration, adopted by the UN in 2000. In accordance with this, India has committed to the challenge of eradicating poverty by the conclusion of 2030. Economic development must occur in tandem with population increase in India to prevent

¹⁰ Maggy Lee (ed) Human Trafficking, 19 (Willan Publishing, Devon, UK, 2007)

¹¹ Maggy Lee (ed) Human Trafficking, 6 (Willan Publishing, Devon, UK, 2007)

¹² India and the MDGS, 'Towards a Sustainable Future for All' United Nations, Economic And Social Commission for Asia and the Pacific, February 2015

¹³ Poverty in India and its causes, available at: <http://www.mapsofindia.com/my-india/society/poverty-in-india-and-its-causes>, accessed on 16-06-2023

unemployment. Individuals residing in poverty often travel for employment opportunities and are susceptible to the influence of traffickers. They exploit individuals under the pretense of offering employment, predominantly targeting women and minor girls, as they are more vulnerable.

The trafficking issue in Delhi, Haryana, and Punjab is a significant consequence of poverty. The laborers must relocate from impoverished regions to locations where they may secure employment; yet, they are exploited by traffickers. Despite the downturn in number of people belonging to the below poverty line the issue of poverty has not been completely done away with. The brokers take advantage of the poor economic conditions and convince the girls or their families that they will provide them employment which shall fulfil all the needs of their family and provide them a better standard of life.

2.3.5 Migration

Article 19(1)(d) guarantees every citizen of India to move freely within the territory of India. It is a fundamental right and hence cannot be taken away under any circumstance. The people are protected by the law against immoral practices but when they migrate beyond the territory of India then it is difficult to trace them. The problem arises when the migration is irregular i.e. where there is manipulation in the process of emigration. Sometimes entry to a country is legally permissible but they extend their stay without the permission of authorities to fulfil their unlawful purposes. The victims generally consent to irregular migration to fulfil their ambitions of employment and later regularize their stay but in case of trafficking they are exploited by various means, for example, prostitution, forced labour, begging, forced organ removal etc.

2.3.6 Commercial Organ Transplant

With the changing lifestyle, food habits, environment and increasing pollution the health of people is deteriorating day by day. "In India around 200,000 people need a kidney every year, but only around 3 % of the demand is met"¹⁴. Enormous amount of money is involved in illegal removal of kidney for transplantation and the people who are in dire need of transplantation agree to pay a hefty amount as demanded. With the increase in demand not only locally but

¹⁴ Why organ trafficking thrives in India?, available at: <http://www.livemint.com/Politics/pxj4YasmivrvAhanv6OOCJ/Why-organ-trafficking-thrives-inIndia.html>, accessed on 16-03-2024

even on international level the business of illegal transplantation is flourishing. The victims to such trafficking are mostly from the poor strata as they are in need of money and willing to take any risk. Right to health is guaranteed as an integral part of Right to life under Article 21 of the Indian Constitution and such practices are clearly violative of the fundamental rights. The Supreme Court (hereinafter referred to as SC) has recognized right to health not only as an obligation of state but a part of Article 21 in the case of *Bandhua Mukti Morcha v. Union of India*¹⁵.

Despite the laws present in India to prevent such practices, commercial transplants has become the easiest and fastest way to earn hefty amount of money. A study was conducted by the Coalition for Organ Failure Solutions to inquire about the cases of commercial kidney removal where victims were situated in Karnataka, Tamil Nadu and West Bengal. The interview showed that the victims were sufferers of poverty. They accepted the fact that they entered into this chaos because of their poor economic conditions or else they wouldn't trade their organs. "The COFS also stated that the number of females that fall prey to human trafficking for organ transplant is far more than that of males"¹⁶.

2.3.7 Forced Labour

The International Labour Organization (hereinafter referred to as ILO) defines the term forced labour as, "situations in which persons are coerced to work through the use of violence or intimidation or by more subtle means such as accumulated debt, retention of identity of papers or threats of denunciation to immigration authorities"¹⁷. The SC has also discussed the word 'force' in the case of *People's Union for the Democratic Rights v. Union of India* as, "Force encompasses not only physical or legal force but also economic force that results from a situation where an individual has no other choice but to fulfill his needs and must perform labor or provide a service even if the compensation is less than the minimum wage."¹⁸.

The victims who fall prey to forced labour or bonded labour come from the weaker section of society. Their suffering increases due to rise in unemployment and poverty. Most of the section

¹⁵ *Bandhua Mukti Morcha v. Union of India*, AIR 1984 SC 812

¹⁶ Donor-Reported Consequences, brochure of the Coalition for Organ-Failure Solutions, available at: <http://cofs.org/home/wp-content/uploads/2012/06/COFS-Brochure-2.png>, accessed on 16-03-2024

¹⁷ Forced Labour, available at: http://www.ilo.org/global/topics/forced-labour/news/WCMS_237569/lang-en/index.htm, accessed on 22-06-2023

¹⁸ *People's Union for the Democratic Rights v. Union of India*, AIR 1982 SC 1943

is not very well literate hence they fail to understand the type of work they are asked to do and the remaining ones who understand that they are being exploited do not raise voice due to their financial conditions. “A survey conducted by ILO shows that 20.9 million people around the world are still subjected to forced labour”¹⁹. ILO has also averted that the element of force in labour cannot be identified only by deciding whether the work is legal or illegal. It can be determined by the employer-employee relationship. There are instances where exploitation for labour was done in agriculture, construction etc.

The Chairman of Senate in United States Foreign Relations Committee has expressed that, “India has seriously violated human rights which are in the form of human trafficking, gender violence and discrimination and persecution of minorities and religious freedom issues to slavery. He stated that as per 2016 report there are 27 million slaves in the world and India has 12 to 14 million slaves, more than any country in the world”²⁰. According to a report in 2014 National Crime Record Bureau affirmed that despite the huge number of offences committed there are very few that are properly investigated, the reason being the police deny registering them or the settlement is done at the initial stage only.

The process of investigation and conviction takes a long time which increases the mental agony suffered by the victims. They either prefer to compromise or to withdraw the case due to uncertainty in conviction. Cases were reported where police officials compelled the victim to not register the complaint as it would cause difficulties to him/her. Hence, the offender goes unpunished and continues to exploit more people.

2.3.8 Lower literacy rate

There can be two reasons behind the low literacy rate in India- one that there is less awareness about the importance of education and second that most of the vulnerable group cannot afford to go to educational institutions. Thus, the most affected faction is that of the girl child because the parents have a mindset to prioritize their male child’s education and the girls are made to labour in order to supplement the family income. More than half of the girls remain deprived of basic education and even those who are sent to elementary schools merely learn to read and

¹⁹ Legal regime of human trafficking of women in India a critical analysis, available at: <http://hdl.handle.net/10603/223438>, accessed on 22-03-2024

²⁰ The crime no one wants to talk about, available at: <https://www.rediff.com/news/special/the-crime-no-one-wants-to-talk-about/20160621.htm>, accessed on 23-06-2023

write. This disparity in education based on gender makes the minor girls to feel unworthy of their own self and as a result they do not raise voice against any kind of exploitation.

2.4 Measures to Combat Human Trafficking



SOURCE- “THE ECONOMIC TIMES”²¹

2.4.1 Prevention from Trafficking

The foremost priority of the law enforcement agencies is to prevent people from getting traded. However there are certain limitations which restrict the system such as estrangement of victims towards the law enforcing agencies, the involvement of families which restrains the victim from filing complaints, the unprocurable data for victim identification etc. “The absence of a set protocol is also a limitation in protection of victims”²². In most cases the effective measures are implemented at the home level where victims are made vulnerable through their parents or guardians. The victims are put to be influenced by a particular section of society to make them fall into the trap of trafficking. The factors which enhance the vulnerability of victim are lack

²¹ Millions believed to be victims of sex trafficking in India: Report, available at: <https://economictimes.indiatimes.com/news/politics-and-nation/millions-believed-to-be-victims-of-sex-trafficking-in-india-report/articleshow/52997359.cms?from=mdr>, accessed on 01-04-2024

²² Veerendra Mishra (ed), Human Trafficking: The Stakeholders’ Perspective, (Sage, New Delhi, 2013).p.284

of awareness and their rights. Other factors such as, “geographical, socio-cultural, economic, or political system of the community, poor law enforcement, ignorance of the public on the subject and the “mute spectator” culture of the observant”²³ also plays an enormous role in this trading.

Another facet of prevention is the reactive mechanism which refers to protection of trafficked victims from being trafficked again. The major challenge is to de-stigmatize and rehabilitate the victims. “The process to accomplish the rehabilitation must involve reintegration, proper counselling and mentoring so that the psychological vandalization can be controlled and there can be redressal of grievances”²⁴. In order to administer and control the traffickers and buyers of the trafficked person there is a necessity for effective legislation and extensive police monitoring. Additionally, increased awareness would play an enormous role in curbing the crime.

2.4.2 Protection of Victims

The most popular and efficient methods used by police administration to protect victims of human trafficking are raids and rescue. However such operations causes infringement upon rights of others but it is a means to achieve greater common good. The legal provision for raid and rescue of victims of commercial sexual exploitation (CSE) is provided in the Immoral Trafficking Prevention Act, 1956 but it creates certain amount of ambiguity. The act is liberally interpreted by the law enforcement agencies, for example, “the rescued women would be considered as a victim in cases where the middleman obtains his share from the money of customers before taking them to sex worker, whereas if the women negotiates directly then instead of being a victim she would be considered as an offender of sexual exploitation”²⁵. Hence, the people from conservative societies are more bent towards moral policing and in lieu of treating them as victims of exploitation they prove them guilty of offence.

2.4.3 Prosecution of Traffickers

The predominant occurrence of human trafficking transpires across borders or between states; therefore, to mitigate the incidence of this crime and prosecute the perpetrators, it is essential

²³ Id.

²⁴ Id.

²⁵ Id

to enhance law enforcement at both the federal and state levels. The effectiveness could be enhanced if other agencies, such as Non-Governmental Organizations (NGOs), actively participate. “Numerous factors contributing to ignorance include the failure to address and identify many cases, attributed to insensitivity and inadequate enforcement of laws.”

2.5 Gaps in Law enforcement leading to failure in combating human trafficking

The crime of human trafficking is one of the most heinous and yet it remains unrestricted. Even after enactment of special laws the state machinery has failed to combat the crime effectively.

2.5.1 Insufficiency in conceptual clarity

The legislation has provided the Immoral Traffic (Prevention) Act, 1956 to curb the menace of human trafficking, despite that there is lack in knowledge and clear understanding of the provisions between the police personnel making the crime more challenging. A study was conducted to reveal how the issue is ignored by police. “When asked about the sensitivity of the crime they misconstrued it to something concerning traffic relating to vehicles”²⁶.

2.5.2 Ratio of police-to-population

“India’s police-to-population ratio lags behind the UN’s recommended ratio”²⁷. The UN put forward a desired number of police officials i.e. 222. “The Bureau of Police Research and Development (hereinafter referred to as BPR&D) compiled a data on police organizations. The ratio as on 01.01.2020 of police personnel per lakh persons is 195.39 as per sanctioned strength and 155.78 as per actual strength”²⁸. According to the Constitution of India, ‘Police’ comes under the purview of List II which is the state matter. Hence, fundamentally it is the obligation of the state government to make appointments in the police force. In India, only two states fulfil the global standard i.e. North-east and Punjab. Alas, notwithstanding the highest police-population ratio the North eastern India ranks to the top in terms of human trafficking.

²⁶ Veerendra Mishra (ed), Human Trafficking: The Stakeholders’ Perspective, (Sage, New Delhi, 2013).p.275-276

²⁷ Sriharsha Devulapalli, Vishnu Padmanabhan. India’s police force among the world’s weakest, available at <https://www.livemint.com/news/india/india-s-police-force-among-the-world-s-weakest-1560925355383.html>, accessed on 01-04-2023

²⁸ Sriharsha Devulapalli, Vishnu Padmanabhan. India’s police force among the world’s weakest, available at <https://www.livemint.com/news/india/india-s-police-force-among-the-world-s-weakest-1560925355383.html>, accessed on 01-04-2023

Following is a table providing for data for police personnel sanctioned and the actual appointments made in the states of India.

S.No.	State/UT	Sanctioned police per lakh population	Actual police per lakh population
1.	Andhra Pradesh	141.06	113.68
2.	Arunachal Pradesh	1011.45	830.31
3.	Assam	251.97	207.49
4.	Bihar	115.26	76.20
5.	Chhattisgarh	261.38	220.53
6.	Goa	659.16	511.78
7.	Gujarat	162.72	122.78
8.	Haryana	241.63	180.19
9.	Himachal Pradesh	257.25	240.52
10.	Jharkhand	218.15	172.18
11.	Karnataka	158.23	125.95
12.	Kerela	177.60	152.49
13.	Madhya Pradesh	158.01	120.02

14.	Maharashtra	198.12	174.87
15.	Manipur	1123.57	942.93
16.	Meghalaya	509.23	455.56
17.	Mizoram	942.07	674.54
18.	Nagaland	1237.30	1300.93
19.	Odisha	146.36	129.31
20.	Punjab	321.00	268.50
21.	Rajasthan	142.14	122.36
22.	Sikkim	972.71	851.27
23.	Tamil Nadu	164.62	148.54
24.	Telangana	209.85	130.88
25.	Tripura	740.68	568.06
26.	Uttar Pradesh	183.19	133.85
27.	Uttarakhand	196.87	188.16
28.	West Bengal	157.38	100.53
29.	Andaman & Nicobar Islands	1253.27	1080.90

30.	Chandigarh	749.96	649.62
31.	Dadra & Nagar Haveli	164.54	142.02
32.	Daman & Diu	128.60	98.60
33.	Delhi	459.01	410.26
34.	Jammu & Kashmir	687.73	610.25
35.	Ladakh	813.95	569.05
36.	Lakshadweep	472.06	392.65
37.	Puducherry	292.97	225.28
	All India Total	195.39	155.78

Source- “Bureau of Police Research & Development”²⁹

The deficit in appointments of police leads to overburdening of the force which unfortunately hampers with the investigation of crime. Another point of consideration which makes the situation graver is the trust deficit of citizens towards the police officials. As stated in a survey conducted in 2018, “15,562 respondents across 22 states on perceptions about policing, the Lokniti team at the Centre for the Study of Developing Societies (CSDS) found that less than 25% of Indians trust the police”³⁰. “Another report acknowledges the fact that the United Nations Office on Drugs and Crime (UNDOC) and BPR&D has trained only 7% of the total police population about human trafficking focusing primarily on trafficking for sexual

²⁹ GOVERNMENT OF INDIA, MINISTRY OF HOME AFFAIRS, RAJYA SABHA, UNSTARRED QUESTION NO. 3266, available at: <https://www.mha.gov.in/MHA1/Par2017/pdfs/par2021-pdfs/rs-24032021/3266.pdf>, accessed on 01-04-2023

³⁰ Sriharsha Devulapalli, Vishnu Padmanabhan. India’s police force among the world’s weakest, available at <https://www.livemint.com/news/india/india-s-police-force-among-the-world-s-weakest1560925355383.html>, accessed on 01-07-2023

exploitation”³¹. Hence, the other facets of trafficking such as domestic servitude, agricultural labour, forced labour or forced beggary goes un-noticed. The distrust between the citizens and the police creates a veil between them and a very large number of cases go unreported.

³¹ Veerendra Mishra (ed), *Human Trafficking: The Stakeholders’ Perspective*, (Sage, New Delhi, 2013) p.280.