



CHAINS OF FLESH AND FEAR: UNVEILING THE HIDDEN NETWORKS OF HUMAN TRAFFICKING & SEXUAL EXPLOITATION ACROSS INDIA

A Criminological Study of Sexual Exploitation, Fear, Organized Crime, and Erosion of “Human Dignity”

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ABSTRACT

This mixed-methods criminological study interrogates the architecture and operational modalities of human trafficking networks in India through legal analysis, survivor narratives, and case studies. It reveals how syndicates orchestrate source-transit-destination flows, exploiting entrenched socio-economic vulnerabilities—poverty, caste, gender inequity, and migratory distress, to perpetuate sexual exploitation and forced labour. Traffickers deploy psychological coercion, leveraging trepidation, isolation, and trauma bonding as invisible chains, while digital technologies—social media, encrypted messaging, and the dark web, amplify recruitment, control, and transregional movement. Survivor testimonies highlight poly-victimization, including abduction, confinement, sexual violence, and persistent threats, compounded by secondary victimization within custodial rehabilitation and adversarial legal proceedings. The study critically evaluates India’s legislative and institutional responses, including the Immoral Traffic (Prevention) Act, IPC amendments, and Anti-Human Trafficking Units, exposing systemic failures: fragmented enforcement, evidentiary challenges,

corruption, and inadequate trauma-informed care. Quantitative indicators from NCRB and qualitative insights from community-based rehabilitation programs underscore chronic underreporting and the marginalization of Dalits, Adivasis, and gender minorities. The analysis foregrounds the gap between legislative intent and implementation, advocating survivor-centric, rights-based justice. It proposes multi-sectoral reforms—trauma-informed mental health services, survivor leadership, digital accountability, and inter-agency coordination, to dismantle trafficking’s systemic roots and foster sustainable social transformation.

Keywords: *Human Trafficking Networks; Sexual Exploitation; Psychological Coercion; Survivor-Centric Justice; Trauma-Informed Care.*

INTRODUCTION

“Human trafficking is the worst form of violation of human rights. It reduces human beings to mere commodities.”

— Smt. Pratibha Patil

Let the story begin once more in the interplay of light and shadow.

Addya, a sixteen-year-old girl whose aspirations far exceeded her situation, bid adieu to her home for the final time. That night, the silence was uncanny. At the gate stood the man who had promised her a “better future”—his presence deceptively comforting, his smile rehearsed, his words warm. They carried the illusion of love, opportunity, hope, and escape. They felt secure, almost fatherly. But optimism, as history has shown, is brittle. As Addya stepped beyond the boundaries of her village, his tone shifted. The smile disappeared. Then came the words that dismantled the very structure of her life:

“Your life belongs to us now.”



In that moment, her world did not merely change—it collapsed. Fear wrapped around her like iron chains. Her identity, breath, footsteps, and silence were seized. Her body became a battlefield; her mind, a prison. The first casualty was her dignity. This is how human trafficking begins—not with physical violence, but with psychological seduction; not with metal shackles, but with fear, deceit, and manipulation.

Addya’s story is not merely a story. It is a **warning**.

A warning about an unseen empire flourishing in the shadows of this nation—an empire built on stolen futures, shattered childhoods, and wounds that often leave no visible scars. Each year, thousands of girls, boys, adolescents, and women across India are lured, recruited, transported, bought, sold, assaulted, and discarded. The ecosystem of trafficking for sexual exploitation is sustained by poverty, gender inequality, caste hierarchies, porous borders, digital grooming, organized criminal syndicates, and institutional silence.

Once more, welcome to the world of insanity, this research paper seeks to unveil the hidden networks of human trafficking and sexual exploitation in India¹—a phenomenon that constitutes not just a legal violation, but a form of psychological warfare and gendered violence. It is an industry founded on fear, thriving across villages, cities, borders, digital platforms, and even within households. Understanding it requires exposing the charismatic recruiters, the transportation cartels, the profit-driven exploiters, and the systemic apathy that enables their operations.

Behind every FIR number, there is an Addya.

Behind every “rescued child,” lies a story society hesitates to confront.

Behind every brothel door, a human soul waits—for justice, for visibility, and for dignity.

¹ Juanida Suzette Horne, ‘A Critical Analysis of Human Trafficking for Sexual Exploitation’ (PhD

CONCEPTUAL FOUNDATIONS

Characterization of Trafficking

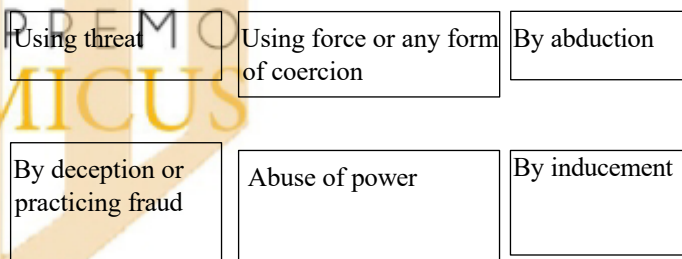
In accordance with Section 370 of IPC (now, Section 143 BNS), which was added to the statute by the Act of Criminal Law (Amendment) in 2013, brings out a clear definition of “**trafficking**”. According to this, there are three major components in defining trafficking viz.,



Action includes any one or more of the following activities:

- (i) Recruiting, (ii) Transporting, (iii) Harboring, (iv) Transferring, and (v) Receiving.

The Modus operandi includes **any one** or more of the following:



The purpose of using the above methods is to achieve the consent of any person having control over the trafficked person and therefore the consent is immaterial if the person is a trafficked victim. Even if the victim had consented, it will not be deemed to be informed consent. Accordingly a consenting trafficked victim is also a trafficked victim and is never an offender.²

thesis, University of South Africa 2014).

² National Human Rights Commission India, ‘Home



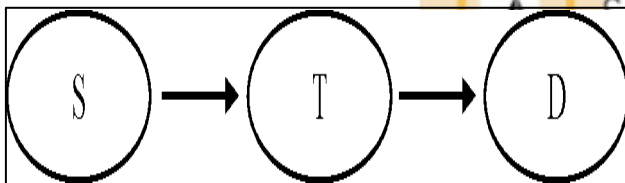
Intent, i.e. the *mens rea* emerges from the purpose of trafficking. Trafficking of a human being can be for any type of exploitation. This would include one or more of the following:

| | |
|----------------------------------|---------------------------------|
| Any act of physical exploitation | Any form of sexual exploitation |
| Slavery | Practices similar to slavery |
| Servitude | For removal of organs |

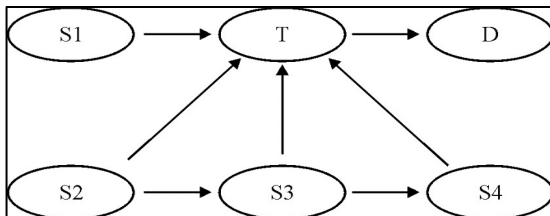
Tracing the Unseen Movements of Human Trade

The routes for trafficking that have been noticed in all Asian Context are of different models as below:

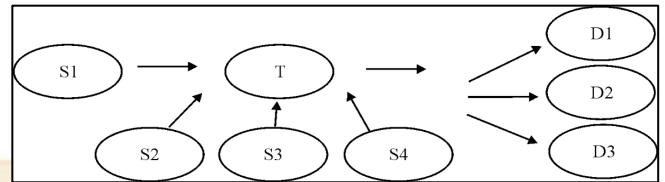
a) **Model 1:** The Linear Route: Trafficking of girls from source S to transit T, where they were joined by other local girls and then moved to destination D, where they were confined for exploitation. This is the commonly observed pattern.



b) **Model 2:** Multi Linear: Girls trafficked from S1 were brought to T1 and were joined by girls trafficked from S2, S3 and S4 etc. and then all were moved to the destination D, where they remained in exploitation.

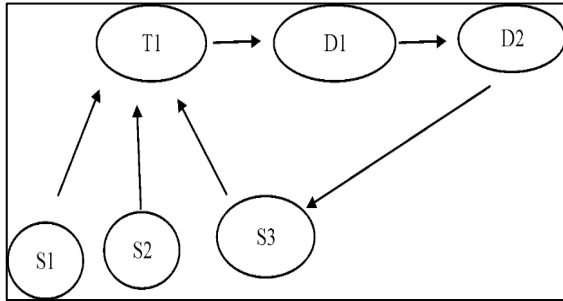


c) **Model 3:** The Matrix: Girls trafficked from S1 were brought to T. They were joined by girls trafficked from S2, S3 and S4 etc., and then they were segregated based on body shape, skin colour and such other parameters from the “customer perspective” (the offender perspective, in fact) and were moved accordingly to destinations D1, D2, D3 and/or more.

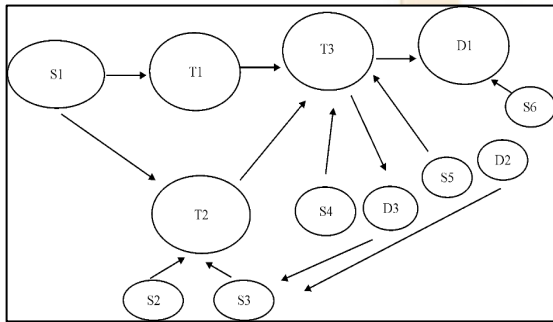


d) **Model 4:** Mega Matrix: Many times, the destinations D1, D2 presented in the model 3 are not the end of the Journey. Many girls brought into these destinations were, after initial exploitation, further transferred to many other places, depending on the demand. Therefore the destination spread to D1 to D6 and more, each destination having been contributed by several sources in addition.

e) **Model 5:** Circular Route: Instances are plenty where the trafficked girls are rescued and sent back home, only to be re-trafficked to the same place or another. The route looks like a closed cycle, but it is not, as re-trafficking opens out the cycle further. The person trafficked from S1, S2 and S3, were brought through transit T to Destination D1 where they were exploited and then moved to D2 where there was more exploitation. The rescue done at D2 was inefficient and inappropriate that the rescued person was sent back to S3 and was re-trafficked. The cycle of exploitation continued.



f) **Model 6:** The complex Matrix: Research and in-depth investigation of many crimes show that, in reality, several routes are intertwined. This is a common feature in the Asian Context. Sources are many, transits are several and destinations are no less. This applies not only to domestic trafficking but also to trans-border trafficking. The ballooning effect that emerges from a diagrammatic presentation, which often defies logic, remains mostly confined to the mind of the offenders, if not investigated systematically.



The Silent Wounds of Trafficked Lives

In society, prostitution is often perceived as the hiring of a human body—flesh and blood, in exchange for money to engage in sexual activity. Tragically, the majority of those trafficked into this trade are young women and children, coerced into sex work against their will. Human trafficking for sexual exploitation is frequently rooted in poverty,

family illness, economic hardship, peer pressure, neglect, and vulnerability during adolescence, particularly between the **ages of 12 and 20**.

Beyond these factors, domestic violence, substance abuse by husbands, forced rape, sexual assault, early marriages, deception by family members or lovers, and outright trafficking further push women into degrading circumstances. Research highlights a disturbing rise in demand for younger girls and virgins, which has led to increasingly organized trafficking networks. These criminal systems expand into new destinations, partly driven by fears of HIV/AIDS, and thrive on exploiting the most vulnerable.

Every individual is born with fundamental freedoms and rights, yet these are grossly violated when children are subjected to organized sexual crimes at such tender ages. Prostitution, in essence, is a brutal form of violence against women. Evidence shows that wherever prostitution is legalized, trafficking escalates to meet the open demand for sex. It is not merely an economic transaction but a violation of human dignity, reinforcing male dominance and perpetuating gender inequality. From ancient times, women have been deprived of both material and emotional entitlements, and behind the facade of “consensual” sex-for-money lies a power imbalance where women are forced to surrender their respect and dignity. Stigma, discrimination, and marginalization further strip away their fundamental equality.

It is difficult to accept that most women willingly choose to become socially devalued figures. In reality, many seek protection from being objectified and aspire to secure the rights guaranteed under **Article 17 and Article 23** of the Constitution of India.³

A chilling reminder of this reality came in 2017, when Karla Jacinto, a survivor of sex trafficking in Mexico, shared her story. Lured away at the age of

³ The Constitution of India 1950, arts 17 and 23.



12, she was subjected to unimaginable abuse. Karla estimates that she was raped approximately 43,200 times, enduring assaults by up to 30 men a day, seven days a week, for nearly four years. Her testimony exposes the horrifying depths of human trafficking, an underground world that has destroyed countless lives of young girls like her.⁴

The Marketplace Where Innocence is Sold

The immoral trafficking of women and girls is one of the pellucid examples of how, throughout history, the sexual desires of men have driven countless young girls, often still in their age of innocence into the flesh trade.⁵ The methods used to force them into this world are brutal and dehumanizing. Initially coerced, many victims eventually adapt to its harsh realities as if it were inevitable, and some, under pressure, are even compelled to recruit other girls into the same fate. This vicious cycle sustains the so-called “respectable” pimps, while society continues to look down upon the women themselves, branding them as “fallen” even when their entry into prostitution was against their will.

Within this exploitative system, each party gains something, except the victim. The customer, whose demand sustains the entire institution, has his physical desires satisfied. The pimp profits financially by managing the trade. The girl, however, suffers the worst: beatings, starvation, and torture during her initiation, followed by the daily ordeal of serving more than ten men, often at the cost of her health and exposure to deadly diseases.

Trafficking operates as a systematic and organized economic activity, built on the displacement and

exploitation of vulnerable individuals. Traffickers work hand-in-hand with customers, preying on victims by transporting them through unfamiliar routes to unknown destinations, cutting them off from their families and communities. Once isolated, the victims are left completely at the mercy of their exploiters. The trade is highly profitable, with little risk of declining demand, as the appetite for young girls and children continues to grow. With minimal investment and quick returns, traffickers reap enormous profits.

Some traffickers act alone, seeking both money and personal sexual gratification, while others function within larger organized networks. Their strategies often involve deceiving families with promises of employment in big cities or marriage to wealthy men. In many cases, families themselves—sometimes parents, relatives, or supposed well-wishers, become complicit. They are persuaded by traffickers who flaunt wealth, pose as grooms, and even marry unsuspecting girls, only to abandon them in brothels. Parents, blinded by illusions of luxury or tempted by advance payments, often rush into such arrangements without questioning the reality. Later, they justify their decisions by citing poverty or ignorance, though in truth they knowingly participated in the transaction.

In regions plagued by poverty and large families, selling daughters for money is tragically seen as an acceptable solution. This normalization of exploitation reveals how deeply entrenched trafficking has become, turning human lives into commodities in the marketplace of greed.

⁴ Noelle Devoe, ‘Human Trafficking Survivor Was Raped 43,200 Times as a Teen, Now She’s Telling Her Story to Congress and the Pope’ (*Seventeen*, 12 November 2015) [https://www.seventeen.com/life/real-girl-stories/news/a35655/human-trafficking-survivor-was-raped-43200-times-as-a-teen-now-shes-telling-](https://www.seventeen.com/life/real-girl-stories/news/a35655/human-trafficking-survivor-was-raped-43200-times-as-a-teen-now-shes-telling-her-story-to-congress-and-the-pope/)

[her-story-to-congress-and-the-pope/](https://www.seventeen.com/life/real-girl-stories/news/a35655/human-trafficking-survivor-was-raped-43200-times-as-a-teen-now-shes-telling-her-story-to-congress-and-the-pope/) accessed 19 December 2025.

⁵ Geeta Sekhon, *Training Manual for Judicial Officers and Prosecutors on Victim Friendly Justice System in Trafficking of Persons Related Crimes* (Prajwala 2018)

<https://prajwalaindia.com/theme/web/pdf/manual/Judicial%20Manual.pdf> accessed 24 December 2025.



Where Innocence is Bought and Sold Daily

The inability to curb trafficking remains a grim reality, and instead of declining, it continues to rise each day. In India, prostitution has grown into an industry worth nearly ₹40,000 crore annually. Shockingly, around 30 percent of sex workers are children, and their exploitation alone generates profits of about ₹11,000 crore. The appalling conditions inside brothels, the tender age of the victims, and the brutal methods used to force them into the trade stand as a shameful truth the nation must confront.

India functions simultaneously as a source, destination, and transit country for trafficking. One of the most notorious centres is **Falkland Road in Kamathipura, Mumbai**⁶, often described as the largest red-light district in India, if not the world. In Kamathipura alone, more than 70,000 women and girls are purchased daily by thousands of men.⁷ Many of these victims are deceitfully trafficked from Nepal and Bangladesh, later forced into brothels across India and even sent to the **Middle East**.⁸

Surveys estimate that India has nearly 10 million sex workers, with about 100,000 concentrated in Mumbai, making it Asia's largest hub of the sex trade.⁹ Alarming, 90 percent of them live as bonded slaves.¹⁰ Each day, approximately 200 women and girls are pushed into prostitution, and 80

percent of them enter against their will.¹¹ Of the total, about 2.5 percent are Nepalese and 2.7 percent are Bangladeshi.¹²

The plight of trafficked women and children extends beyond brothels. Hundreds of Bangladeshi victims remain trapped in foreign prisons, shelters, and detention centres, awaiting repatriation, many for years. Records show women, girls, boys, and even children of unknown identity being held in facilities such as **Lilua Shelter and Sheha Shelter in Kolkata, Anando Ashram in Kolkata, Alipur Children's Home in Delhi, Nirmal Chaya in Delhi, Prayas Observation House for Boys in Delhi, Tihar Jail in Delhi, Udavam Kalanger and Umar Khan in Bangalore, Kishalay in West Bengal, Cooch Behar in West Bengal, and Berhampore in West Bengal**.¹³

The numbers are staggering. Around **160,000 Nepalese women are believed to be confined in Indian brothels, with Mumbai alone housing nearly 50,000 and Kolkata accounting for another 40,000**.¹⁴ These figures reveal the scale of exploitation and the entrenched nature of trafficking networks that continue to thrive despite the immense human suffering they cause.

⁶ *The Selling of Innocents*, dir William Cobban and Ruchira Gupta (Malofilm Video 1997).

⁷ Tim McGirk, 'Nepal's Lost Daughters, India's Soiled Goods' (27 January 1997), quoted in Donna M Hughes and others, 'Coalition Against Trafficking in Women' in *The Factbook on Global Sexual Exploitation* (1999) <http://uri.edu/artsci/wms/huhei/catw/factbook.htm> accessed 19 December 2025.

⁸ Robert I Friedman, 'India's Shame: Sexual Slavery and Political Corruption Are Leading to An AIDS Catastrophe' (*The Nation*, 8 April 1996).

⁹ *ibid.*

¹⁰ Centre for Development and Population Activities and Planning Rural-Urban Integrated Development

through Education, 'Devadasi System Continues to Legitimate Prostitution: The Devadasi Tradition and Prostitution' (*The Times of India*, 4 December 1997).

¹¹ Indrani Sinha, 'Paper on Globalization and Human Rights' (SANLAAP India), quoted in *Factbook on Global Sexual Exploitation*.

¹² CEDPA and PRIDE (n 10).

¹³ Fawzia Karim Firoze and Salma Ali, 'Bangladesh Country Paper: Law and Legislation' (Bangladesh National Women Lawyers' Association) <https://apneaap.org/wp-content/uploads/12/FAQ-on-Demand-for-Sex-in-India.pdf> accessed 19 December 2025.

¹⁴ Friedman (n 8).



Hidden Pathways that Sustain Human Trafficking

In Mumbai, certain brothels are known to house only Nepalese girls, chosen by men for their fair skin and submissive demeanour.¹⁵ **During major raids in 1996, more than 40 percent of the 484 girls rescued from Mumbai's brothels were of Nepalese origin.**¹⁶ Kolkata has long served as a crucial transit hub for traffickers moving women toward Mumbai and even Pakistan. From Bangladesh, nearly all trafficked women—**about 99 percent**, are smuggled through land routes along border areas such as **Jessore**.¹⁷

The trade is not confined to big cities alone. Along **Goa's Baina beach**, at least 2,000 women are engaged in prostitution.¹⁸ States like **Karnataka, Andhra Pradesh, Maharashtra, and Tamil Nadu** are considered major “supply zones” for women entering the sex trade.¹⁹ Districts such as **Bijapur, Belgaum, and Kolhapur** frequently see women migrating to larger cities, either through organized trafficking networks or under the pressure of socioeconomic hardship.²⁰

Highways across India have also become notorious for small-scale brothels. Many *dhabas* along the **Solapur–Hyderabad highway** offers women as an “extra service” to truck drivers and travellers. One such establishment is run by a woman who herself was once in the trade; with just a shed, two cots, and a few girls from nearby villages, she now operates her own brothel.²¹

Entire communities have also been drawn into this cycle. **Sagargram**, a village off National Highway (NH- 59) connecting Delhi and Mumbai, is largely inhabited by the **Banchharas community**, where prostitution is practiced openly, catering mainly to truck drivers.²² Similarly, the **Basai tribe** on the outskirts of **Agra in Uttar Pradesh** became so notorious for prostitution that families outside the community refused to marry their daughters into it.²³

Other highways, such as **NH-5** stretching from **West Bengal to Tamil Nadu**²⁴ and **NH-2** passing through **Beda in Bihar's Rohtas district**, are infamous for the flesh trade. Here, **women of the Nutt caste** have been engaged in prostitution for nearly seventy years, supported and protected by local police, musclemen, and *dhaba* owners.²⁵ These entrenched practices reveal how deeply trafficking and exploitation are woven into certain regions and communities, sustained by demand and systemic complicity.

When Childhood Becomes the Currency of Exploitation

The average age of girls entering the sex trade has been steadily declining. Over the past decade, it has dropped from **14–16 years to as young as 10–14**.²⁶ In India, an estimated 300,000 to 500,000 children are trapped in prostitution.²⁷ Disturbingly, girls as young as nine are forced into the trade, driven by the

¹⁵ *ibid.*

¹⁶ Masako Iijima, ‘S. Asia Urged to Unite Against Child Prostitution’ (*Reuters*, 19 June 1998).

¹⁷ UBINIG, ‘Trafficking in Women and Children: Cases of Bangladesh’ (1995) 18–19, quoted in *The Factbook on Global Sexual Exploitation* (n 7).

¹⁸ Frederick Noronha, ‘India Abroad News Service’ (9 August 1997), quoted in *The Factbook on Global Sexual Exploitation* (n 7).

¹⁹ Meena Menon, ‘The Unknown Faces’ (Central Social Welfare Board 1998), quoted in *The Factbook on Global Sexual Exploitation* (n 7).

²⁰ *ibid.*

²¹ Meena Menon, ‘The Twilight Zone’ (Central Social Welfare Board 1998), quoted in *The Factbook on Global Sexual Exploitation* (n 7).

²² Deepak Tiwari, ‘Sex-Stops on the Highway’ (*The Week*, 24 June 2001).

²³ *ibid.*

²⁴ *ibid.*

²⁵ *ibid.*

²⁶ Menon (n 21).

²⁷ McGirk (n 7).



false belief that **sex with a virgin** can cure sexually transmitted diseases such as **gonorrhoea and syphilis**. Even seven-year-old victims are not unheard of. In Mumbai alone, nearly 20,000 women in prostitution—**about 20 percent, are under the age of 18**.²⁸

Bangalore is among the five major cities that together account for 80 percent of child prostitutes in the country.²⁹ Investigations by the **Karnataka State Commission for Women (KSCW)** uncovered a trafficking network smuggling girls **aged 12–18** from impoverished districts to brothels in Goa.³⁰ Many of these girls are sold by poor parents, deceived into sham marriages, or lured with false promises of employment, only to end up imprisoned in brothels. Once trapped, they are subjected to brutal **“training”** that includes beatings, starvation, cigarette burns, exposure to pornography, forced lessons in pleasing customers, and repeated rapes, **until they can service up to 25 men a day**.³¹

The exploitation extends beyond India’s borders. Women and children are trafficked daily to countries in the **Middle East**, where they are held in near-total captivity, tortured, sexually abused, and raped.³² Across India’s 1,000 red-light districts, **“cage prostitutes”** are often minors, many trafficked from **Nepal and Bangladesh**.³³

In 1992, Mumbai police intercepted 25 Bangladeshi children aged just **5 to 8**.³⁴ By 1998, around 200 Bangladeshi women and children were awaiting repatriation in Indian shelters.³⁵

²⁸ Rahul Bedi, ‘Bid to Protect Children as Sex Tourism Spreads’ *London’s Daily Telegraph* (London, 23 August 1997).

²⁹ Friedman (n 8).

³⁰ Seethalakshmi, ‘Karnataka Girls Being Sold to Goa Brothels’ (*The Times of India*, 28 May 1998).

³¹ *ibid.*

³² Soma Wadhwa, ‘For Sale: Childhood’ (*Outlook*, 20 July 1998), quoted in *The Factbook on Global Sexual Exploitation* (n 7).

³³ Indrani Sinha, ‘Paper on Globalization and Human Rights’ (SANLAAP India 1998), quoted in *The*

The cycle of abuse continues with the children of sex workers, who themselves often become victims of sexual exploitation. Many are forced to dance, sing, or even provide sexual services to buyers.³⁶ In Mumbai, it is reported that 95 percent of sex workers’ children eventually enter prostitution. One child, repeatedly sodomized by men who purchased his mother, chose to become a eunuch and underwent ritual castration.³⁷

The scale of child prostitution is staggering. In **Delhi’s red-light district**, about 60 percent of commercial sex workers are minors. Despite amendments to the **Immoral Trafficking Prevention Act of 1986**, the average age of trafficked or abducted girls has fallen **from 14 to 13** in recent years.³⁸ A rescue operation in July 2001 at **GB Road, Delhi**, revealed the extent of the crisis—**ten girls were freed from a single brothel, all of them minors**.³⁹

SITUATIONAL ANALYSIS OF HUMAN TRAFFICKING IN INDIA

Trafficking in human beings, especially in women and children, has become a matter of grave concern in India. Trafficking is an organised crime which thrives on human misery. Despite strong steps taken by the Government of India, the **trafficking rackets and syndicates** have become more organised and expanded into newer forms of trafficking. The crime has expanded in such a way that today almost every state is affected with this social and criminal menace. Though trafficking for commercial sexual

Factbook on Global Sexual Exploitation (n 7).

³⁴ McGirk (n 7).

³⁵ Firoze and Ali (n 13).

³⁶ ‘Boys Rescued in India While Being Smuggled to Become Jockeys in Camel Races’ (*El Siglo*, 19 February 1998) www.elsiglo.com accessed 20 December 2025.

³⁷ S Sridevi Goel, ‘Girl Child Prostitution, Society’s Responsibility: Indian Scenario’ (1999) VII(4) CBI Bulletin 14.

³⁸ Menon (n 21).

³⁹ *The Hindustan Times* (22 July 2001) 2.



exploitation continues to be an area of distress, lately, there has been an increase in trafficking of women and children for **forced marriages, bondage and slavery**. The situational analysis of the dimensions of human trafficking in India is as follows:⁴⁰

Trafficking for Forced Marriages

Every year, thousands of young women and girls in Punjab and Haryana are seduced by the prospect of a happy married life with a wealthy guy, which is frequently presented as a choice of union.⁴¹ The majority of “purchased brides” are repeated as maids, mistreated, denied fundamental rights, and ultimately abandoned. Finding a bride for every man is unfeasible due to skewed sex ratios [**Punjab: 893, Haryana: 877 females per 1,000 males**]⁴², and “importing a bride” has become the sole option. It will take many years for the demographic situation in these states to stabilise since it has grown so distorted. Due to the high demand for “marriageable age” girls, organised trafficking networks have begun to operate in **Uttar Pradesh, Punjab, and Haryana**.⁴³ Over 9,000 married women in Haryana were purchased from other states⁴⁴, according to a **Drishti Stree Adhyayan Prabodhan Kendra** NGO field study on the effect of sex ratio on the pattern of marriages in the state that covered over 10,000 homes.⁴⁵

According to the survey, which looked at 92 villages in the districts of **Mahendragarh, Sirsa, Karnal, Sonapat, and Mewat**⁴⁶, the majority of individuals acknowledged it as a prevalent practice, but denied having purchased a bride for their family.⁴⁷ Due to their families’ need for money, the majority of women and girls who are coerced into marriages originate from impoverished communities in **Assam, West Bengal, Jharkhand, Bihar, and Odisha**. As a result, they become victims of human trafficking. The majority are either **untraceable, exploited, or replicated** as domestic help by the men or agents who purchase or marry them.

After being married for a few years, there are also cases of girls being sold to other people. There have also been reports of forced marriage trafficking from **Gujarat’s Kutch region**.⁴⁸ Due to the regions’ skewed sex ratio and single men’s frantic search for marriages, hundreds of **Bengali-speaking Muslim women are being trafficked from West Bengal and Bangladesh to Kutch**, where they are sold off as brides. Many of these women are even forced into the flesh trade.⁴⁹

Trafficking for Commercial Sexual Exploitation

There is a rise in trafficking for commercial sexual exploitation. **West Bengal, Andhra Pradesh, Karnataka, Maharashtra, and Odisha**⁵⁰ remain

⁴⁰ UNODC, *Regional Profile: South Asia* (2003) https://www.unodc.org/documents/india/regional_profile_south_asia.pdf accessed 22 December 2025.

⁴¹ Margaret Alston (ed), *Women, Political Struggles and Gender Equality in South Asia* (Palgrave Macmillan 2014).

⁴² UNODC, *Current Status of Victim Service Providers and Criminal Justice Actors in India on Anti Human Trafficking* (2013) https://www.unodc.org/documents/southasia/reports/Human_Trafficking-10-05-13.pdf accessed 24 December 2025.

⁴³ *ibid.*

⁴⁴ UNODC (n 40).

⁴⁵ Mohd Irshad, ‘A Review of Bride Trafficking in India’ (2021) 5(2) *Antyajaa: Indian Journal of Women and Social Change* 109.

⁴⁶ UNODC (n 40).

⁴⁷ NHRC (n 2).

⁴⁸ UNODC (n 40).

⁴⁹ Farhana Ibrahim, ‘Policing Muslim Marriage: The Specter of the “Bengali” Wife’ in *From Family to Police Force: Security and Belonging on a South Asian Border* (Cornell University Press 2021).

⁵⁰ LBSNAA, *Case Study-Compendium of Teaching Cases & Pedagogical Tools* (National Gender and Child Centre 2025) [https://www.lbsnaa.gov.in/storage/uploads/pdf_data/1740378913_Case%20Study%20\(NGCC\).pdf](https://www.lbsnaa.gov.in/storage/uploads/pdf_data/1740378913_Case%20Study%20(NGCC).pdf) accessed 20 December 2025.



India's top source regions for trafficking to the country's red-light districts. There are still a lot of missing girls in these states. The commercial sexual exploitation of women and children for prostitution has changed as a result of modernisation.⁵¹

Prostitution dens have persisted in the red-right districts, but, by offering services on demand, the industry has grown beyond these areas and become much more organised. **In the guise of friendship clubs, escort services, massage parlours, spas, dance bars, beer bars, etc., the sex trade's operators have grown and begun operating out of residential colonies, marketplaces, shopping centres, etc.**⁵² This has enabled the traffickers to access high-paying clients and make the most money possible.

They have even begun using the internet and media to promote their services. Deals are made over the phone, and online transactions take place. Even though there has been a lot of police activity through the AHTUs⁵³, these agencies have proliferated around the nation, and the industry is still growing. Leading news aperture, India Today, **revealed how women and girls are being transported from Ukraine, Georgia, Kazakhstan, Uzbekistan, Azerbaijan, Chechnya, and Kyrgyzstan**—all of which are members of the **Commonwealth of Independent States (CIS)**.⁵⁴

Additionally, **the rackets are procuring victims from Malaysia, Thailand, Nepal, and other countries**.⁵⁵ The year 2012 saw the authorities bust sex networks that supplied women and girls from Thailand to Pune and Goa. The majority of the dealing is done online and has turned into a money-making venture.

. Kidnapping Rackets and Denotified Tribes (DNTs)

Police investigations in Delhi, Agra, Madhya Pradesh, and Rajasthan have revealed that criminal tribes, also known as *Denotified tribes*, such as **the Bedia, Nat, Khanjar, Banjara**⁵⁶, and others, who practise prostitution as a family custom, are responsible for the kidnapping of young girls from all over the parts of Northern India. They take hostage of young girls and raise them as if they were their own. The young females are given hormones like oxytocin to make them appear older.

The victims are subsequently used as dancers in Mumbai's bars and are then supplied to prostitution rings in Dubai and other Middle Eastern nations. Women from a village in Rajasthan's Alwar district have a lot of passports, according to police investigations. Similar behaviour has also been discovered in the Mandsaur district by Madhya Pradesh police investigations.

Trafficking and Adoption Rackets

The trafficking of minors for adoption has increased. By paying them money, the traffickers procure children from low-income families and then sell them for adoption overseas. These felonies are widespread, according to police investigations in Delhi and many other parts of the nation.⁵⁷ There have been reports of illicit adoption companies selling children for adoption in **Jharkhand, Andhra Pradesh, Maharashtra, and Delhi**.⁵⁸ The practice of acquiring children for adoption through the exchange of money has augmented, despite the Government of India designating a Central Agency to oversee adoptions.⁵⁹

A sting operation conducted by CNN-IBN and Cobrapost (print and electronic media channels) in April 2012 revealed a "baby bazaar" in a

⁵¹ UNODC (n 40).

⁵² *ibid.*

⁵³ *ibid.*

⁵⁴ *ibid.*

⁵⁵ *ibid.*

⁵⁶ UNODC (n 42).

⁵⁷ UNODC (n 40).

⁵⁸ LBSNAA (n 50).

⁵⁹ UNODC (n 40).



government hospital in Amroha, Uttar Pradesh where infants were being taken from impoverished parents and sold to the highest bidders in a startling fable of child trafficking and exploitation of the poor.⁶⁰

Missing Children and Human Trafficking

The connections between human trafficking and missing individuals were made abundantly evident in the **NHRC Action Research 2004**. Since then, the NCRB's missing people statistics have been meticulously examined in relation to the quantity of women and children being trafficked in India. The number of children that are still unfathomable in India's missing child data is alarming. According to a report on missing children by **Bachpan Bachao Andolan (NGO)**, there were **1,17,480 missing children in 2010–11, but the NHRC Report anticipated 44,000 lost children between 1996 and 2001**.⁶¹

According to **NCRB data from 2009 to 2011, 1,776,60 children were reported missing; of these, 1,22,190 were found, and 55,470 are still unfathomed. 35,615 (64%) of the children that are still incalculable are young girls. A total of 1,59,418 women were reported missing between 2009 and 2011. 1,03,468 of these women were located, but 55,950 were still unfathomable**.⁶²

STATE RESPONSE TO COMBAT HUMAN TRAFFICKING

(In Connection with India's Country Assessment Report)

Legislations

The Government of India has shown its commitment to combating human trafficking and strengthening

various legislations for victim protection by ratifying the **United Nations Convention against Transnational Organised Crime (UNTOC)** and its three Protocols supplementing the convention which includes the **Protocol to Prevent, Suppress and Punish Trafficking in persons, especially Women and Children**. The UNTOC along with the Trafficking Protocol came into force in India w.e.f. **4th June 2011**.⁶³

The Government of India has constituted an Inter Ministerial Group to consider and recommend proposals for the amendment to the special legislation in India titled the **"Immoral Traffic Prevention Act, 1956"**.⁶⁴

The Minister of Women and Child has notified the **Protection of Children from Sexual Offences Act, 2012** to strengthen the legal provisions for the protection of children from sexual abuse and exploitation. For the first time, a special law has been passed to address the issue of sexual offences against children. Sexual offences are currently covered under different sections of IPC (now, BNS). The IPC or BNS does not provide for all types of sexual offences against children and, more importantly, does not distinguish between adult and child victims.⁶⁵

The Union Cabinet has in **August 2012** recommended the **amendment of the Child Labour (Prohibition & Regulation) Act 1986** to bring it in conformity with the **Right to Education as mandated in Article 21-A of the Constitution of India**.⁶⁶

The Government of India has also notified rules for the **Juvenile Justice (Care and Protection) Act 2000**

and almost all states have adopted the model rules in their State horizon.⁶⁷

⁶⁰ *ibid.*

⁶¹ *ibid.*

⁶² *ibid.*

⁶³ UNODC (n 42).

⁶⁴ *ibid.*

⁶⁵ *ibid.*

⁶⁶ *ibid.*

⁶⁷ *ibid.*



The Government of India has strengthened the application and enforcement of the **Emigration Act, 1983** to regulate the recruitment agencies.⁶⁸

The Government of India has amended the **Code of Criminal Procedure in 2009 and included Section 357- A (now, Section 396 BNSS) relating to victim compensation**, thus making victim compensation a reality in India. Compensation for victims of human trafficking and grave sexual offences has been included as a special category by almost all the states who have notified the scheme.⁶⁹

Judicial Interventions

The Supreme Court of India has **nominated the National Legal Services Authority and the State Legal Services Authority** to conduct training and sensitization programmes for all **Juvenile Police Units** across the country. In the case of *Sampurna Behrua v. Union of India* (2018) 4 SCC 433⁷⁰, the Court has been monitoring the implementation of the Juvenile Justice (Care and Protection) of Children Act 2000.⁷¹

The Apex Court in the case of *Re: Exploitation of Children in Orphanages in State of Tamil Nadu v. Union of India & Others* (2017) 7 SCC 578⁷² has **appointed the National Commission for Protection of Child Rights (NCPCR)** to monitor the implementation of the Juvenile Justice (Care and Protection) of Children Act 2000.⁷³

The Supreme Court also in the case of *Bachpan Bachao Andolan v. Union of India* (2011) 5 SCC

1⁷⁴ has laid down detailed guidelines for combating human trafficking in India.⁷⁵

It was further observed in the case of *Buddhadev Karmakar v. State of West Bengal* (2011) 11 SCC 538⁷⁶ that **a panel was constituted to examine the issue of rehabilitation of sex workers and trafficked victims**. The committee has been holding various meetings and consultations with various state governments to suggest solutions for strengthening of the rehabilitation mechanism.⁷⁷

The Supreme Court in 2012 has issued notice to all states on the issue of missing children. Following the notice, the High Courts of Delhi, Punjab and Haryana have passed detailed orders to register FIR in cases of missing children.⁷⁸

A. Ministry of Home Affairs, Government of India

The Ministry of Home Affairs' initiative of creating an **Anti-Trafficking Cell** has led to the strengthening of the law enforcement response to the organised crime of human trafficking. The Ministry has **initiated 225 AHTUs across the country (as of August 2012)** which has led to the increase in registration of cases and strengthening of prosecutions.⁷⁹

The nodal officers meeting being conducted by the Ministry has led to strengthening of inter-state police cooperation which was a contentious issue in the fight against human trafficking. **During 2010-12, in most cases of human trafficking, police investigations have started to cover the**

⁶⁸ *ibid.*

⁶⁹ UNODC (n 40).

⁷⁰ *Sampurna Behrua v Union of India* (2018) 4 SCC 433.

⁷¹ *ibid.*

⁷² *Re: Exploitation of Children in Orphanages in State of Tamil Nadu v Union of India & Others* (2017) 7 SCC 578.

⁷³ UNODC (n 42).

⁷⁴ *Bachpan Bachao Andolan v. Union of India* (2011) 5 SCC 1.

⁷⁵ UNODC (n 40).

⁷⁶ *Buddhadev Karmakar v. State of West Bengal* (2011) 11 SCC 538.

⁷⁷ *ibid.*

⁷⁸ UNODC (n 42).

⁷⁹ *ibid.*



traffickers at the source, transit and destination.⁸⁰

The advisories issued by the MHA has led to the strengthening of various legal procedures and investigations of cases of human trafficking. The advisories have brought clarity on many of the issues concerning enforcement of laws on human trafficking in India. The State Governments have been asked to implement the advisories and send action taken reports. With the various proactive advisories, the State Governments have started capacity building of the various law enforcement agencies in their states. The advisories have also created a mandate for the State Governments to ensure convergence among all stakeholders in the state.⁸¹

The training and capacity building of law enforcement agencies including the prosecutors have created an immense difference in defying human trafficking. The law enforcement machinery has become responsive and aware of the complexities of the crime of human trafficking. The need of multi stakeholder participation in each case of trafficking is being ensured.⁸²

The capacity building and training of prosecutors has also created decent results in terms of the prosecutors devoting time with the victims and understanding their case history. The very fact that victims and prosecutors

are having an interview in the presence of the NGOs lead to the prosecutors' getting clarity in the case. Also the instructions have been provided to the prosecutors to get help from NGO's counsels in this regard.⁸³

The Judicial Colloquiums being held at the High Court level is creating a positive impact in the trial of cases of human trafficking. A mandate is being

created by the high courts to ensure swift trials of cases of human trafficking and dealing with victims in a scrupulous way. The Colloquiums have led to the capacity building of trial court magistrates.⁸⁴

The Ministry has created a **set of 12 Manuals for the training of law enforcement agencies in collaboration with UNODC**. The number of arrests of women under the Immoral Traffic Prevention Act 1956 has gone down indicating that the police are not arresting the victims under **Section 8 of ITPA**.⁸⁵

Ministry of Women and Child, Government of India

The Ministry regularly holds Central Advisory Committee meetings to review the various issues in thwarting human trafficking. Almost all the states and the nodal NGOs are part of the Central Advisory Committee.⁸⁶

The Ministry has launched an ambitious comprehensive scheme called the "Integrated Child Protection Scheme". The scheme is to **implement the provisions of the Juvenile Justice (Care and Protection of Children) Act 2000**. As a part of the scheme, all State Governments have initiated the **State Child Protection Societies**. The scheme has led to the formation of country wide network of **District Child Protection Societies, Child Protection Homes and the creation of Child Welfare Committees**. This scheme has led to the creation of institutional bodies to ensure child protection at the district level and also to create convergence among various stakeholders. To combat human trafficking and to ensure victim protection, the presence of these institutions is very crucial. Besides creating the institutions, the Ministry has also initiated steps to build their capacities. This scheme is making an enormous divergence in offsetting human trafficking as the

⁸⁰ *ibid.*

⁸¹ *ibid.*

⁸² *ibid.*

⁸³ *ibid.*

⁸⁴ *ibid.*

⁸⁵ *ibid.*

⁸⁶ *ibid.*



agencies have been created across the country and are instrumental in conducting home investigation reports and also to oversee repatriation and rehabilitation of victims of human trafficking.⁸⁷

The Ministry has expanded the CHILDLINE network to 211 cities under the Integrated Child Protection Scheme. The Ministry has increased budgetary allocation for its flagship schemes for rehabilitation which includes **Swadhar and Ujjwala Scheme**. Proposals are being reviewed in consultation with the State Government responses and recommendations. The Ministry of Home Affairs has also been made part of the project sanction committee. The Ministry is also taking steps to bring a monitoring mechanism for the shelter homes. **The Ministry has in principle taken a decision to sanction one Swadhar home in each district of the country.** The Ujjwala project has a very strong component of prevention of human trafficking at the source areas.⁸⁸

National Commission for Protection of Child Rights (NCPCR)

The NCPCR has been inter-alia involved in the implementation of the Juvenile Justice (Care and Protection) of Children Act 2000. It has been assisting the Supreme Court and the various High Courts in the implementation of legislations related to children. It has done extensive case reports on the **issue of child labour in BT cotton fields in Gujarat and Rajasthan.** It has done extensive case reports on **brick kilns in Rajasthan and Odisha.** NCPCR has assisted the Supreme Court in providing a situational report in case of trafficking of children from the **North East by shelter homes in South India.**⁸⁹

It has undertaken reports on the **trafficking of child labour in the rat hole coal mines of Meghalaya and trafficking of children from Jharkhand.** On

the directions of the Delhi High Court, the NCPCR **has drafted an action plan for combating child labour in Delhi.** It has undertaken investigation of shelter homes in **Haryana, Uttar Pradesh, Kerala and Delhi** where cases of sexual exploitation have been reported. NCPCR has been undertaking visits to various states to monitor the implementation of **Right to Education and Integrated Child Protection Schemes.**⁹⁰

State Governments

Many of the states have been proactively addressing human trafficking issues and taking measures to strengthen the law enforcement and institutional machineries. The State of **Andhra Pradesh, Kerala, Karnataka, Bihar and Goa** have created a State Action Plan to combat human trafficking. **Bihar Government has notified a scheme for combating child labour in the state.** The State of **Delhi, Andhra Pradesh, Meghalaya, Mizoram, Bihar, Rajasthan, West Bengal, Kerala, Manipur, Karnataka, Maharashtra, Odisha, Tamil Nadu, and Punjab** have initiated the **Victim Compensation scheme.** **Andhra Pradesh, Karnataka, Tamil Nadu, Kerala, Odisha, Meghalaya, and Mizoram** have proactive **State Advisory Committees to coordinate convergence among various stakeholders.**⁹¹

⁸⁷ UNODC (n 40).

⁸⁸ *ibid.*

⁸⁹ *ibid.*

⁹⁰ *ibid.*

⁹¹ *ibid.*



The State of Andhra Pradesh has put in place Minimum Standards of Care in shelter homes of victims of trafficking. These standards for shelters for victims of commercial sexual exploitation or survivors of sex trafficking are those non-negotiable care components that should be integrated in any home managed either by the government or the civil society to ensure that facilities for rehabilitation are in place as a matter of right of the victim. These standards ensure that the **safety, dignity and well-being of each victim are provided** for. Maharashtra Government is the first state government to create a SOP for the Child Welfare Committees.⁹²

In view of the rising cases of trafficking of children from **Jharkhand, the State Government has sanctioned a shelter home in Delhi for coordinating the rescue and repatriation of children. Andhra Pradesh, Maharashtra and Delhi Police have taken proactive steps to trace missing children and women.** In these states the percentage of recovery of missing children and women has increased considerably. **Andhra Pradesh, Delhi, Haryana, and Punjab are registering FIR in cases of missing children.** Delhi Police has created a “zip net” network of ten states for profiling missing children and missing persons. **The West Bengal Police has created a website for profiling missing children (www.trackthemissingchild.gov.in) now, (<https://missionvatsalya.wcd.gov.in/>).** AHTUs across the country have initiated a database of traffickers.⁹³

SCHEMES

A trafficking victim’s **urgent care and protection, long-term rehabilitation, repatriation, and reintegration** are all included in the care and protection. The Ministry of Women and Children, Government of India, is required by laws such as the

Juvenile Justice (Care and Protection) of Children Act, 2000 and the Immoral Traffic Prevention Act, 1956 to establish such institutional mechanisms and develop programmes and schemes for the welfare of women and children who require care and protection. The following are a few of the Ministry of Women and Children’s numerous programmes that directly affect the protection and care of victims of human trafficking.⁹⁴

UJJAWALA:

A comprehensive scheme for prevention of trafficking and rescue, rehabilitation and reintegration of victims of trafficking and commercial sexual exploitation. One organised crime that violates fundamental human rights is the trafficking of women and children for commercial sexual exploitation.⁹⁵ For both domestic and international trafficking, **India has become a source, destination, and transit country.** Because of its many facets and complexity, the issue of trafficking women and children for commercial sexual exploitation is particularly difficult. Some of the factors that contribute to human trafficking include **poverty, women’s low status, the absence of a safe environment, etc.** In order to combat trafficking, particularly in susceptible areas and demographics, and to facilitate the rescue, rehabilitation, and reintegration of trafficked victims, a multisectoral approach is required. The Ministry has developed a central program called “UJJAWALA,” which is a **comprehensive program for preventing trafficking as well as rescue, rehabilitation, and reintegration of victims of trafficking for commercial sexual exploitation, keeping in mind the aforementioned problems and gaps.**⁹⁶ The program, which was introduced in **2007**, was primarily designed to prevent human trafficking while simultaneously rescuing and rehabilitating

⁹² *ibid.*

⁹³ *ibid.*

⁹⁴ *ibid.*

⁹⁵ Tom Lantos Human Rights Commission, ‘Home’ <https://humanrightscommission.house.gov/> accessed 20 December 2025.

⁹⁶ UNODC (n 40).



victims.⁹⁷ According to the most recent data available, the Ministry is supporting **228 initiatives in 21 states, 117 of which are protective and rehabilitative homes.**⁹⁸

Non-Governmental Organisations (NGOs) are primarily responsible for the scheme's implementation. The programme is open to eligible implementing agencies from every State and Union Territory. Project proposals under the initiative must be submitted through the relevant Union Territory Administrations or State Governments.⁹⁹ Women and children who are both victims of and at risk of being trafficked for commercial sexual exploitation are the beneficiaries of the Ujjawala scheme.¹⁰⁰ The states have been asked to include officials at the district level for routine monitoring, among other things, while a monitoring framework is being developed. **The Planning Commission's Programme Assessment Organisation has been tasked with conducting an assessment study for Ujjawala, which will include reviewing the components.**

SWADHAR GREH: A Scheme for Women in Distress

The Department of Women and Child Development introduced the SWADHAR GREH in 2001–02. Another program called the “Short Stay Home Scheme” was designed to give homeless women and girls temporary housing and rehabilitation assistance. The program seeks to **rehabilitate these women in challenging situations by offering them food, clothing, shelter, counselling, training, clinical, and legal assistance.**¹⁰¹ In order to evaluate the

effectiveness of both programs, **the Centre for Market Research and Social Development in New Delhi carried out an assessment in 2007.**¹⁰² While highlighting the efficacy and beneficial effects of the measures implemented under the counselling and rehabilitation schemes, the evaluation report discovered that the resident profile and category, admission process, counselling, quality of service, vocational training, rehabilitation, and follow-up procedure are nearly identical in both schemes.¹⁰³ As a result, it suggested combining these two programs for improved performance and results with less administrative hassles and processes. Additionally, it suggested that the new plan concentrate on creating one of these homes in each district. The Ministry's preparation of this new program, which would allow women victims of tragic situations who require institutional support for rehabilitation to live with dignity, was prompted by the evaluation study's excellent findings.¹⁰⁴

The program aims to provide women who are victims of challenging situations with a supportive institutional framework so they can live their lives with conviction and dignity. It envisions providing such women with economic and social security as well as housing, food, clothes, and health care. Additionally,

it anticipates that these women's unique needs are appropriately met and that they should never be neglected or abandoned, since this could result in their exploitation and desolation.

Under the planned plan, “Swadhar Homes” with a capacity of thirty women will be established in each

⁹⁷ Renu and others, ‘Safeguarding women in the workplace: Comprehensive strategies for enhancing safety and wellbeing’ (2025)

⁹⁸ UNODC (n 40).

⁹⁹ UNODC (n 42).

¹⁰⁰ Thippeswamy S, ‘A Critical Analysis of India's Child Domestic Workers’ (2024) 6(1) *Indian Journal of Law and Legal Research* 5170.

¹⁰¹ Renu and others (n 93).

¹⁰² UNODC (n 40).

¹⁰³ Jagori, ‘Home’ <https://www.jagori.org/> accessed 20 December 2025.

¹⁰⁴ UNODC (n 40).



district to meet the basic requirements of distressed women who lack social and financial assistance, including food, clothes, housing, and medical care. Additionally, it would help them rebuild the emotional resilience that has been weakened by their woeful experiences, and it would give them legal support and direction so they may take action to reintegrate into their families and communities. The programme aims to rehabilitate economically and emotionally distressed women and serve as a support system that recognises and fulfils their needs so they can begin their lives again with persuasion and dignity.

For big cities and other districts having more than 4 million population or those districts where there is a need for additional support to the women, more than one “Swadhar Home” could be established. **The capacity of “Swadhar Homes” could be expanded up to 50 or 100 on the basis of need assessment and other important parameters.**¹⁰⁵

INTEGRATED CHILD PROTECTION SCHEME:

The Indian government introduced the **Integrated Child Protection Scheme (ICPS) in 2009 to guarantee high-quality child protection systems throughout the nation and to foster convergence.**

The realisation of the duty of the government or state for developing a system that will effectively and efficiently protect children has been greatly aided by the ICPS.¹⁰⁶ It is founded on the fundamental ideas of safeguarding children’s rights and looking out for their best interests.

In a nutshell, the goals of ICPS are to diminish vulnerabilities to circumstances and behaviours that result in **child abuse, neglect, exploitation, abandonment, and separation, as well as to increase the wellbeing of children in challenging settings.** The MWCD is implementing the ICPS to create and manage the human resources and infrastructure required to create a safe and secure environment for children, particularly those in challenging situations. State governments and UT administrations get funding to improve, establish, and maintain homes, open shelters for children in need of care and protection, and Specialised Adoption Agencies (SAAs).¹⁰⁷ Additionally, funding is given for the establishment of specialised service delivery structures at the state and district levels, with personnel hired specifically to **provide services to children, such as need assessment, training and sensitisation, awareness-raising, etc.** Additionally, the program emphasises non- institutional care via foster care, adoption, and aftercare.¹⁰⁸

The Memorandum of Understanding (MoU) for the scheme’s implementation has been signed by all states, with the exception of Jammu & Kashmir. The State Governments and UT Administrations are primarily responsible for implementing the government sponsored system, and they receive funding.¹⁰⁹ The scheme’s many components are being implemented by the State Governments and UT Administrations, either independently or through non-governmental organisations. However, **as part of a Government-Civil Society Partnership, the MWCD has teamed with the Childline India Foundation (CIF), Mumbai, to deliver the**

¹⁰⁵ *ibid.*

¹⁰⁶ *ibid.*

¹⁰⁷ Paromita Chattoraj (ed), *Child Protection in India: Trends, Issues and Challenges* (Routledge 2025).

¹⁰⁸ Partners for Law in Development, *Desk Review of News Reports on Human Trafficking* (November 2020) <https://www.fighttrafficking.org/wp-content/uploads/2023/06/COVID-News.pdf> accessed 21 December 2025.

¹⁰⁹ Scheduled Caste and Scheduled Tribe Research and Training Institute (SCSTRTI), *Resource Envelop and Convergence Prospects under various Government Schemes: Compilation of 388 Government Schemes* (SCSTRTI 2017) https://repository.tribal.gov.in/bitstream/123456789/73918/1/SCST_2017_research_0085.pdf accessed 21 December 2025.



Childline services, a 24×7 phone helpline for children in distress.¹¹⁰

JUDICIAL PRONOUNCEMENTS

Cases pertaining to the strengthening of the institutional machinery and other statutory agencies mandated by various laws have been considered by the Supreme Court and the various High Courts.¹¹¹ In carrying out its mandate to uphold fundamental rights, the Court has rendered a number of significant rulings to bolster government action. In preventing human trafficking, **The Supreme Court has also established a number of committees and panels to guarantee that the law is implemented and that different monitoring systems are in place for the protection of victims of human trafficking.**¹¹²

a) ***Vishal Jeet v. Union of India* (1990) 3 SCC 318**

The Apex Court in this case ordered the formation of Advisory Committee for all States and Union Government to combat trafficking. The Advisory Committee to make suggestions for the measures to be taken in eradicating child prostitution, and the social welfare programmes to be implemented for the care, protection, treatment, development and rehabilitation of trafficked victims of commercial sexual exploitation.¹¹³

b) ***Gaurav Jain v. Union of India* (1997) 8 SCC 114**

While clearly stating the violation of Right to Life of trafficked victims, the Supreme Court ordered the Union Government to form a Committee to frame

the Action Plan for the Nation and to conduct an in-depth study into these problems and develop such suitable schemes for rehabilitation of trafficked women and children.¹¹⁴

***Prerna v. State of Maharashtra* 2003 (2) Mah.L. J. 105**

The Bombay High Court in this case lays down process for care and protection of trafficked children. It stated that Advocates cannot appear before the Child Welfare Committee to take custody of trafficked child.¹¹⁵

c) ***State of A.P. v. Bodem Sundara Rao* (1995) 6 SCC 230**

The Supreme Court reiterated that courts should grant strict punishment for crimes of sexual offences. It stated that courts have an obligation while awarding punishment to impose appropriate punishment so as to respond to the society's cry for justice against such miscreants. Public abhorrence of the crime needs a reflection through the court's verdict in the measure of punishment.¹¹⁶

d) ***State of Punjab v. Gurmit Singh* (1996) 2 SCC 384**

It was observed that sexual offenders should not be shown leniency. Examination of the victim should be conducted in camera and anonymity of the victim should be maintained. No questions should be asked on a victims character.¹¹⁷

e) ***Bachpan Bachao Andolan v. Union of India* (2011) 5 SCC 1**

¹¹⁰ UNODC (n 40).

¹¹¹ National Legal Research Desk, 'Landmark Rulings of the Courts in India on Combatting Human Trafficking' (15 October 2013) <https://nlrd.org/Landmark-Rulings-of-the-Courts-in-India-on-Combatting-Human-Trafficking-Trafficking/> accessed 21 December 2025.

¹¹² UNODC (n 40).

¹¹³ *Vishal Jeet v Union of India* (1990) 3 SCC 318.

¹¹⁴ *Gaurav Jain v Union of India* (1997) 8 SCC 114.

¹¹⁵ *Prerna v State of Maharashtra* 2003 (2) Mah LJ 105.

¹¹⁶ *State of AP v Bodem Sundara Rao* (1995) 6 SCC 230.

¹¹⁷ *State of Punjab v Gurmit Singh* (1996) 2 SCC 384.



This is the major judgment where the Supreme Court dealt with child labour and trafficking, making the National Commission for Protection of Child Rights (NCPCR) the nodal agency for Juvenile Justice Act implementation.¹¹⁸

f) ***Budhadev Karmakar v. State of West Bengal (2011) 11 SCC 538***

Supreme Court appoints a Panel to monitor and suggest rehabilitation scheme for trafficked sex workers and trafficked victims.¹¹⁹

g) ***Bachpan Bachao Andolan v. Union of India and Ors. (2013) 4 SCC 152***

Supreme Court orders for mandatory registration of First Information Report (FIR) in cases of missing children and appropriate steps should be taken to see that follow up investigation is taken up immediately thereafter.¹²⁰

PROSPECTIVE MEASURES

- a. The **National Plan of Action 1998** needs to be reviewed and the same needs to be notified. State Governments should also draft their Action Plan to Combat Human Trafficking.¹²¹
- b. Standard Operating Protocols need to be notified for interstate police investigations.¹²²
- c. Ensuring regular meetings of the State Advisory Committees since they have a great potential to create convergence among all stakeholders at the state level.¹²³
- d. Strengthening **Police-NGO partnership** and rescue

efforts in the states, form advisory board of social workers **u/s. 13(b) of the ITPA.**¹²⁴

- e. Framing model minimum standards of victim care for shelter homes, enabling State Governments to adopt them and thereby ensuring improved victim care and protection.¹²⁵
- f. Funds for the shelter homes need to be sanctioned on time to avoid mishandling of the shelter homes.

The present system of sanction of instalments continues to be time consuming.¹²⁶

- g. The ICPS has created various institutional mechanisms at the District level like the Child Protection Units and the Child Welfare Committees. There is a need for capacity building and strengthening of institutions in addition to adequate funding and infrastructural support so that these agencies can function properly and ensure documentation of each and every case.¹²⁷

- h. Emphasis should be laid on prevention of trafficking from **source and transit areas. Panchayati Raj institutions should be strengthened and these can be facilitated to act as vigilance mechanism for prevention of trafficking.** Role of community in this exercise should be explored. Moreover, **institutions like Anganwadi etc.** can be used as vehicles for carrying information and awareness.¹²⁸
- i. Missing Children is an area of concern and requires urgent attention.¹²⁹

- j. The **Missing Children Advisory Committee** requires all State Governments to nominate a State Nodal Officer on Missing Persons. Similarly, a District level nodal officer should be appointed to monitor cases of missing children and women at the district levels.¹³⁰

- k. The AHTUs and the Police need to ensure scientific

¹¹⁸ *Bachpan Bachao Andolan v Union of India* (2011) 5 SCC 1.

¹¹⁹ *Budhadev Karmakar v State of West Bengal* (2011) 11 SCC 538.

¹²⁰ *Bachpan Bachao Andolan v Union of India and Ors* (2013) 4 SCC 152.

¹²¹ UNODC (n 40).

¹²² *ibid.*

¹²³ *ibid.*

¹²⁴ *ibid.*

¹²⁵ *ibid.*

¹²⁶ *ibid.*

¹²⁷ *ibid.*

¹²⁸ *ibid.*

¹²⁹ *ibid.*

¹³⁰ *ibid.*



and efficient investigations into the cases of crimes against children and women. **The present rate of conviction stands at 25–30%.** With multi stakeholder participation and partnerships, the police can ensure better investigation of cases and also ensure strong prosecution witnesses in order to get conviction of cases. All State Nodal Anti Human Trafficking Units should monitor the conviction rates of human trafficking cases.¹³¹

- l. Training manuals prepared by the MHA in collaboration with UNODC need to be translated into regional languages.¹³²
- m. Constitution of special courts for speedy trial in trafficking cases need to be established in all states as per the provision of **Immoral Traffic (Prevention) Act, 1956.**¹³³
- n. Need for video conferencing facilities at district levels in order to ensure that trafficked victims don't have to personally appear for testifying and cross examination.¹³⁴

CONCLUSION

Human trafficking in India stands as one of the gravest assaults on human dignity, freedom, and constitutional morality. Trafficking for sexual exploitation is not an isolated criminal activity but a highly organized, profit-driven system sustained by poverty, gender inequality, social complicity, and institutional inertia.¹³⁵ Essentially, it is the destruction of human dignity whereby persons are deprived of their identity, autonomy, and bodily integrity and reduced to goods in an underworld market.

Addya walked away once believing in a promise. She never came back the same way. That is how

trafficking thrives—not just through force and fear, but through the power of hope turned into a weapon. As evident through this research, human trafficking is a crime that silently thrives in fear instead of through chains and in silence instead of in justice. It starts in trust, passes through deception, and reaches a point where dignity is lost but voices aren't.

Laws exist, Courts speak, Schemes continue anyway. Still, trafficking persists because of the hesitation of those in authority to enforce the laws and the **Turning A Blind Eye** of the community in general. Removing the trafficked and rehabbing them is merely the beginning of the end; it is not the end itself.

But every story has a turning point.

Human trafficking is an object of human design, a function of systems, which means it can also be unraveled by will. Protection instead of fear, rights holders instead of evidence, a community that will not remain silent—that ends the cycle.

The end of trafficking will not come with louder laws, but with deeper consciences. Until then, innumerable feet will vanish into darkness, carrying stories like Addya's—awaiting not sympathy, but justice.

¹³¹ *ibid.*

¹³² *ibid.*

¹³³ *ibid.*

¹³⁴ *ibid.*

¹³⁵ Danielle Kraaijvanger, 'Prevention and Education: A Case Study of an Anti-Human

Trafficking Nongovernmental Organization in Mumbai, India' (Doctoral dissertation, University of San Francisco 2020) <https://repository.usfca.edu/diss/525> accessed 24 December 2025.