**CALL FOR COMMENTS: DRAFT GENERAL RECOMMENDATION ON “TRAFFICKING IN WOMEN AND GIRLS IN THE CONTEXT OF GLOBAL MIGRATION”[[1]](#endnote-2)**

**INTRODUCTION**

* The Joint United Nations Programme on HIV and AIDS (“UNAIDS”) provides the following key concerns and recommendations on the Draft General Recommendation on Trafficking in Women and Girls in the Context of Global Migration (“Draft GR”).
* UNAIDS unequivocally condemns and works towards the prevention and elimination of all forms of coercion, deception, violence, exploitation and trafficking in persons (for any distinct purpose including commercial sexual exploitation) and welcomes efforts towards eliminating trafficking and supporting women and girls who are victims, or at risk, of trafficking, from a gender perspective.
* UNAIDS welcomes the Draft GR and reiterates the statements made in its joint submission with UNDP and UNFPA in February 2019.[[2]](#endnote-3) UNAIDS is concerned that the current Draft GR overemphasises and overly relies on a broad criminal and punitive approach, rather than a rights based, supportive and empowerment approach that focuses on root causes of trafficking in the context of migration such as socio-economic inequalities, violence, gender norms, lack of labour rights and safeguards and the vulnerabilities of women in the informal sector. In UNAIDS’ experience, an overly criminal approach can create significant risks for vulnerable women and girls including increased violence and abuse and decreased access to services, such as healthcare. In our view, this is of particular concern for women involved in sex work, who have been adversely affected by “end demand” models of legislation and overly broad trafficking legislation.
* UNAIDS understands that the intended scope of the Draft GR does not include sex work. However, in its current form, the Draft GR does not expressly state this exclusion, or discuss in sufficient detail the need to create safeguards to mitigate any negative effects of anti-trafficking efforts on sex workers. This failure: (a) creates a serious risk of inadvertently criminalising sex work, a step which is neither supported by evidence nor human rights jurisprudence, including CEDAW’s own Concluding Observations;[[3]](#endnote-4) and (b) risks removing or endangering any legal and social protections where these are in place for sex workers.

UNAIDS recommends restructuring the Draft GR to place greater emphasis on creating an enabling environment for women and girls. This includes (a) making a clear distinction between trafficking, sexual exploitation and consensual sex work and (b) ensuring policies are evidence based and that sex workers are not adversely affected by anti-trafficking efforts, including by removing punitive approaches to ending demand and including sex workers on the development of anti-trafficking policies, laws and programmes The suggested amendments are drafted in such a way as to be consistent with international obligations and evidence and to strengthen, rather than weaken, domestic approaches to trafficking in persons.

1. **Recommendation on structure and emphasis**
   1. UNAIDS is concerned that the structure and emphasis of this document appear to prioritise punitive and criminal approaches to root causes, demand and response. While such approaches can be useful, where supported by evidence and carefully crafted in collaboration with civil society to avoid collateral harm, they should not be the primary focus of a gender transformative approach to trafficking and migration. In UNAIDS’ experience, the removal of stigma and discrimination against women in all their diversity, the transformation of harmful gender norms, the creation of safe labour standards and provision of social protection to all women are key to ensuring women are empowered to protect their own safety, health and wellbeing.[[4]](#endnote-5) UNAIDS recommends recrafting the document to prioritise the creation of enabling social, economic and legal environments for women and girls in the context of migration and trafficking.
2. **Clarification of scope of ‘trafficking in persons’ and imprecise use of terms ‘prostitution’ and ‘sexual exploitation’ (paras 9, 24 and 66).**

**Requested change (new para. 9):**

* 1. The Committee notes that the terms ‘trafficking in persons’ and ‘sexual exploitation’, as utilized in this General Recommendation, do not refer to sex work [i.e. prostitution].[[5]](#endnote-6) Sex work is where female, male, and transgender adults and young people over the age of 18 receive money or goods in exchange for consensual sexual services, either regularly or occasionally.[[6]](#endnote-7) Sex work should not be conflated with trafficking in persons and/or sexual exploitation.[[7]](#endnote-8) [Section III, new para. 9] (insertion)

**Reason and recommendation**

* 1. Sex work entails the consent of sex workers, over the age of 18, and their capacity to exercise that consent voluntarily.[[8]](#endnote-9) Trafficking, on the other hand, involves coercion and deceit, resulting in loss of agency on the part of the trafficked person.[[9]](#endnote-10)
  2. The conflation of sex work with trafficking in persons (and/or sexual exploitation) can lead, and has lead, to overly broad and punitive laws, policies and practices that: increase stigma and discrimination against sex workers; put sex workers at increased risk of violence, arrest and incarceration; infringe on sex workers’ right to health and self-determination, among other rights; impede efforts to prevent and prosecute trafficking and violence; inhibit programmes for reducing HIV among sex workers.[[10]](#endnote-11)
  3. UNAIDS understands that the GR is not intended to cover sex work. However, without such a clarification the Draft GR risks being implemented by States or law enforcement in a manner that conflates sex work with trafficking, or that may disregard the impacts of anti-trafficking efforts on sex workers, thus leading to *de facto* criminalisation of sex work, including criminalisation of clients, risk of raids on sex worker premises, evictions, greater levels of violence and abuse. This can lead to significant risks of harm to sex workers, as described in section 3. It is imperative that this GR make clear that it does not include sex work within its scope and that states must ensure anti-trafficking do not cause inadvertent harm to sex workers.
  4. Ensuring the protection and safety of sex workers and their exclusion from trafficking laws does not in any way necessitate a weakening of criminal sanctions against trafficking in persons. On the contrary, it can strengthen the implementation of such laws and encourage reporting of crimes, by focusing resources on fighting trafficking, freeing sex workers from fear of arrest, discrimination, or police abuse and enabling their participation and assistance in combatting trafficking.
  5. Where any form of coercion, deception, violence or exploitation is involved in sex work, this should be subject to criminal law. Sex workers should be able to bring cases of such exploitation, coercion and violence to the police, and be provided with protection and redress, under general and/or, if applicable, trafficking laws. UNAIDS strongly condemns coercion, deception, violence, exploitation and trafficking in persons in any shape or form; they constitute human rights violations and UNAIDS works towards the prevention and elimination of these.

**Requested change (para. 24):**

* 1. “In its general recommendation no. 34 (2016) on rural women, the Committee highlighted that the economic hardships of rural life including the negative effects of climate change, high levels of poverty, restricted access to State benefits, protection and services, resulting in, inter alia, low levels of education, and low awareness on how traffickers operate, render rural women especially vulnerable to exploitation, in particular ~~in prostitution and~~ as domestic workers and in conflict-affected regions.” [section IV, para 24] (deletion)

**Reason and recommendation**

* 1. The Committee’s documents that form the basis for this provision - CEDAW/C/GC/34), para. 26 and CEDAW Contributions to the 2030 Agenda for Sustainable Development (2017 HLPF)] - do not mention “prostitution” in any way that merits its introduction in the Draft GR. The former document contains a single reference to “prostitution”, and only in quoting the precise text of Article 6.

**Requested change (para. 66):**

* 1. “A challenge in identifying female victims of trafficking is the lack of gender-sensitivity of relevant professionals, including front-line professionals, that is needed to adequately understand, identify and respond to incidences of trafficking in women and girls , particularly as victims are often hidden in non-public areas such as private residences, isolated factories and farms, and brothels and private apartments used specifically for commercial sexual exploitation (as opposed to sex work).” [Section V, para 66] (insertion)

**Reason and recommendation**

* 1. As noted in 2.1 above, whilst the term sexual exploitation does not have an agreed definition it should not be conflated with or used generally to refer to sex work, for the reasons outlined above.[[11]](#endnote-12) As such, the addition of the language above expressly resolves any ambiguity.

1. **Draft GR framework for demand reduction and criminalisation. (paras 19 and 27)** 
   1. “Discourage ~~the demand that fosters~~ all forms of exploitation of persons, especially women and children, that leads to human trafficking by: […]” [Section IV, para. 27] (deletion)
   2. “Root causes of trafficking in women and girls ~~and discouraging the demand that fosters their exploitation through trafficking”~~ [Section IV; Section IV, e; and Section IV, para. 19] (deletion in all instances the wording appears)
   3. ~~“Where applicable, instituting penal legislation to sanction the users of goods and services that result from trafficking in persons~~ “ [Section IV, para 27(b)] (deletion)

**Reason and recommendation**

* 1. These clauses, if implemented in their current form, create a serious risk of significant harm to sex workers. Without an express provision stating that it does not apply to sex workers or their clients (read together with the other changes proposed in this Response), it could amount to tacit endorsement of criminalisation of various aspects of sex work under the so-called ‘Nordic model’.[[12]](#endnote-13) The operational effect of para. 27(b) would mean that clients of sex workers and/or third parties who facilitate sex work, which could include sex workers themselves, risk being caught by criminal laws and/or other punitive laws, policies or practices.
  2. Any approach to trafficking, particularly the use of criminal laws, must be evidence based and non-discriminatory or arbitrary. There is strong evidence that criminalisation of any aspect of sex work, whether *de jure* or *defacto*, and associated stigma and discrimination, including in the health sector, reduces sex worker’s ability to negotiate condom use, and prevents them from accessing HIV prevention, treatment, care and support services and restricts enjoyment of broader rights. [[13]](#endnote-14) Criminalisation of sex work (whether the target is the purchaser, seller or third parties who facilitate sex work) also leads to increased violence against sex workers from clients, law enforcement and/or third parties who facilitate work.[[14]](#endnote-15) Recognising the harms caused by criminal and punitive laws on sex work, the WHO and the UNDP Global Commission on HIV and the Law have both called for the decriminalisation of sex work as a key element of the HIV response for sex workers and their clients.[[15]](#endnote-16)
  3. The 2016 Report of the UN Secretary General on the Fast Track to ending the AIDS epidemic noted that: “Misuse of criminal law often negatively impacts health and violates human rights […] the decriminalization of sex work can reduce violence, harassment and HIV risk. Sex workers should enjoy human rights protections guaranteed to all individuals, including the rights to non-discrimination, health, security and safety.”[[16]](#endnote-17) The report recommended that to ensure that no populations are left behind and to provide for access to services, States should: remove punitive laws, policies and practices that violate human rights, including […] sex work; and address all forms of violence against key populations.[[17]](#endnote-18)
  4. It should be made clear that the approach to trafficking for sexual exploitation should be similar to that of other forms of trafficking for labour exploitation. The end demand model is not considered appropriate to trafficking for labour and domestic work. Rather the approach is on ensuring access to safe and regular migration pathways and introducing labour security and support frameworks and formalising forms of work.
  5. CEDAW has recognised the adverse human rights impact of client criminalisation on sex workers[[18]](#endnote-19) and recommended implementation of labour, security and health frameworks to “prevent and combat other exploitative practices assimilated to trafficking”.[[19]](#endnote-20) CEDAW has also recognised that violence is enabled by the criminalisation of sex work.[[20]](#endnote-21) The Committee has previously called on States to end direct and indirect criminalisation of women sex workers.[[21]](#endnote-22) This includes removing administrative penalties and other measures used against sex workers with a view to decriminalising women in sex work.[[22]](#endnote-23)
  6. There is also a danger that 27(b), if interpreted too broadly, would breach human rights standards in relation to criminal laws. Any criminal law should be limited to situations where individuals have the requisite knowledge and mens rea of the underlying offence of trafficking. Anything less could condemn innocent persons.
  7. UNAIDS recommends that para. 27(b) be removed. In addition, references to reducing demand should be removed completely and greater attention paid to addressing root causes through a gender transformative and empowerment approach. If removing references to reducing demand is not possible, the emphasis on a criminal approach to demand should be minimised, including deletion of 27(b), and the Draft GR should expressly state that any such laws must be evidence based, only be introduced where there is evidence as to their effectiveness, narrowly defined to avoid unintended harms to sex workers, and limited to cases where the services are actually the result of trafficking and the user had the requisite knowledge and intent as required under human rights law. It must be made clear that reducing demand for sex work is not included in this recommendation.

**Requested change (para. 27(d)):**

* 1. “~~Investigating, prosecuting and convicting all perpetrators involved in the trafficking of persons~~,  ~~including those on the demand side~~.” [Section IV, para 27(d)] (deletion)

**Reason and recommendation**

* 1. The content of para. 27(d) is addressed fully at para. 84 and is better formulated there. Please refer to our submissions relating to criminalisation of sex work above, which outline the impact of criminalising the demand side of sex work. Furthermore, the terminology used in this paragraph is extremely broad-sweeping and is liable to bring into scope of the provision all manner of individuals who play no part in trafficking of persons. For instance, landlords, taxi drivers and co-operatives, who may be considered to facilitate sex work, would be caught by the provisions, as drafted.

1. **Recognition of victims and the adverse collateral effects of anti-trafficking efforts (paras 68 and 92).**

**Requested change (new section on Adverse Collateral Effects and new paragraph):**

* 1. Paragraph 92 should be moved to its own section on Adverse Collateral Effects with explanatory notes, including the next paragraph below)
  2. The Committee notes that States should ensure that criminal laws and or other punitive laws, practices or policies do not extend to sex work, noting the unintended consequences that criminalisation of the buying of sex or even profiting from sex work can have on the safety and physical integrity of women involved in sex work. To this end states should work in collaboration with women involved in sex work in the development of anti-trafficking laws and policies and practices.[[23]](#endnote-24) States must also ensure that sex workers are not automatically labelled as victims of trafficking when they are not, and uphold, safeguard and realise their human rights” [Section TBC, new para.] (insertion)

R**eason and recommendation**

* 1. UNAIDS welcomes paragraph 92 on adverse collateral effects. However, we are of the view that such a paragraph requires its own section and explanatory text, ideally earlier in the document. Adverse effects should not be limited to the sections on investigation, prosecution and punishment, as adverse effects can occur at all stages.
  2. Within this section, it will be important to emphasise that anti-trafficking efforts should not result in criminal prosecution of, or justify other restrictive measures against adults who are involved in sex work, whether they be sex workers, clients or third parties.
  3. It should also include discussion of the need to ensure that identification of victims does not lead to the assumption that all sex workers are victims. Such misidentification can lead to arbitrary raids on homes and places of work, arrests and incarceration. Assuming that all sex workers are trafficked denies the autonomy and agency of people who sell sex. Moreover, such perspectives mean that anti-trafficking efforts typically ignore the possibility of engaging sex workers as partners in identifying, preventing and resolving situations that do involve trafficked people. Sex workers themselves are often best placed to know who is being trafficked into commercial sex and by whom, and are particularly motivated to work to stop such abhorrent practices.[[24]](#endnote-25)

**Requested change (para. 92):**

* 1. “Adverse collateral effects of anti-trafficking efforts: (a) Ensure that anti-trafficking legislation and directives are not overly broad and/or otherwise misused or misinterpreted by authorities to impose increased restrictions on communities or falsely arrest and charge innocent people, particularly women from disadvantaged groups and women involved in sex work~~women in prostitution~~” [Section VI, para 92(a)] (insertion and deletion)
  2. For Paragraphs 92(b) – (e) please include women involved in sex work for each paragraph [Section VI, para 92(b) – (e)] (insertion)

**Reason and recommendation**

* 1. Sex workers are specifically acknowledged and recognised in para 92, sub-paragraph (a) but are not in the remaining sub-paragraphs (b) to (e) – the wording should be amended in each to add the following after the word “women”: “particularly women from disadvantaged groups and women involved in sex work”. UNAIDS recognises the Committee’s responsiveness to previous comments about the misuse by authorities of anti-trafficking legislation vis-à-vis sex workers. With that in mind, greater specificity in the subsequent sub-paragraphs will provide clarity and allow clear measurement of States’ compliance and implementation of the General Recommendation. Wording is added to ensure all those involved in sex work (which is, by definition, consensual and involving adults only) are likewise not targeted as this could lead to *de facto* criminalisation of clients or third parties unconnected to trafficking and cause harm to sex workers.

**Requested change (para. 68):**

* 1. “Early identification and protection of presumed victims of human trafficking: […]

j) Empower communities through support and consultation to build strong allies for anti-trafficking efforts, ~~including faith-based actors~~, who could provide critical information about trafficked women. These community-led systems should be established at locations and among groups where there may be trafficked women; including sites where forcibly displaced women and migrants are accommodated, registered or detained.” [Section V, para 68] sub-para. (j) (deletion and/or insertion)

**Reason and recommendation**

* 1. The paragraph as drafted includes specific reference to faith-based groups but not others. In UNAIDS experience it is important that should be given precedence are those who may be affected by trafficking and anti-trafficking efforts or who in other ways are responsible for ensuring labour standards and other regulations are adhered to. There is no reason for faith-based organisations to be particularly mentioned. The suggestion would be to either delete faith-based groups or include a broader list of all relevant stakeholders that should, inter alia, trade unions, workers cooperatives, representatives from vulnerable groups who may be affected (positively or negatively) by anti-trafficking efforts, LGBTIQ groups, and sex workers (or women involved in prostitution).

1. **Ensuring the participation of all relevant groups affected by trafficking and anti-trafficking efforts. (para 32)**

**Requested change (para. 32):**

* 1. “Ensure women’s meaningful participation in trafficking prevention efforts: (a) The expertise and voices of women and girl victims of trafficking, as well as women from disadvantaged groups, women at risk of being trafficked, and sex workers, must be included and accounted for at all stages of efforts to prevent and combat trafficking, including training, programme and research design, development, implementation, monitoring and evaluation, as well as legislative and policy drafting;” [Section IV, para 32] (insertion)

**Reason and recommendation**

* 1. From the HIV response, we know that it is crucial to ensure that the voices of affected communities are heard and respected, that communities must have a role in designing and implementing approaches. Given sex workers’ vulnerability to trafficking, their knowledge of trafficking and the impact of approaches on sex workers, it is imperative that they are part of designing the solutions. Where sex workers’ communities are empowered, supported and consulted, they can be strong allies, and formal partners, for anti-trafficking efforts, providing critical information about trafficked and underage people.[[25]](#endnote-26) The sex worker community stands against trafficking in persons as a human rights abuse. In order to ensure that countries continue their obligations to strengthen legal and social protections of sex workers and safeguard their human rights, including their rights to protection against violence, health and access to social security, all of which also contribute to tackling the root causes of trafficking, it is necessary that sex workers are included in the creation of such laws and policies to ensure they do not inadvertently reduce the safeguards and protections of rights that sex workers should enjoy (as CEDAW itself has stated).

[END]

1. This document is based, inter alia, on the: UNAIDS, Guidance Note on HIV and Sex Work, March 2009, updated April 2012; UNDP, Global Commission on HIV and the Law: Risks, Rights and Health, July 2012; WHO, Guidelines on prevention and treatment of HIV and other sexually transmitted infections for sex workers in low- and middle-income countries, December 2012; UN Women, Note on sex work, sexual exploitation and trafficking, 2013; UNAIDS, Guidance Note on Services for Sex Workers, 2014; UNSG, Framework of actions for the follow-up to the Programme of Action of the International Conference on Population and Development Beyond 2014, Report of the Secretary-General, February 2014; United Nations Office on Drugs and Crime (UNDOC), Issue Paper: The Concept of ‘Exploitation’ in the Trafficking in Persons Protocol, 2015; UNSG, On the fast track to ending the AIDS epidemic, Report of the Secretary-General, April 2016; CEDAW, Concluding observations on the ninth periodic report of Norway, CEDAW/C/NOR/CO/9, 2017; UNAIDS, Joint United Nations Statement on Ending Discrimination in Health Care, June 2017; UNAIDS, UNFPA, UNDP, Joint submission to CEDAW on trafficking in women and girls in the context of global migration, 18 Feb 2019. [↑](#endnote-ref-2)
2. UNAIDS, UNFPA, UNDP, Joint submission to CEDAW on trafficking in women and girls in the context of global migration, 18 Feb 2019, available at <https://www.ohchr.org/Documents/HRBodies/CEDAW/GRTrafficking/UNAIDS_UNDP_UNFPA.docx> (accessed on 8 May 2020). [↑](#endnote-ref-3)
3. CEDAW/C/NOR/CO/9, 2017, paras 28-29; CEDAW/C/CHE/CO/4-5, para 28-29; among others. [↑](#endnote-ref-4)
4. UNAIDS *We’ve Got the Power,* March 2020. [↑](#endnote-ref-5)
5. UNDOC, Issue Paper: The Concept of ‘Exploitation’ in the Trafficking in Persons Protocol, 2015, available at <https://www.unodc.org/documents/human-trafficking/2015/UNODC_IP_Exploitation_2015.pdf> (accessed on 7 May 2020). [↑](#endnote-ref-6)
6. Sex workers are “consenting female, male and transgender adults and young people [aged 18-24] who receive money or goods in exchange for sexual services, either regularly or occasionally...” UNAIDS, Guidance Note on HIV and Sex Work, March 2009, updated April 2012 (UNAIDS Guidance Note) available at <http://www.unaids.org/sites/default/files/sub_landing/files/JC2306_UNAIDS-guidance-note-HIV-sex-work_en.pdf> (accessed on 7 May 2020). [↑](#endnote-ref-7)
7. Trafficking for the purposes of commercial sexual exploitation involves adults or children providing sexual services against their will, either through direct force or through deception, violating their fundamental freedoms. As such, it violates the rights and removes the agency of trafficked persons. See further, UNAIDS Guidance Note. [↑](#endnote-ref-8)
8. WHO, UNFPA, UNAIDS, NSWP, World Bank & UNDP, 2013, Implementing Comprehensive HIV/STI Programmes with Sex Workers: Practical Approaches from Collaborative Interventions, 2013, available at <https://www.who.int/hiv/pub/sti/sex_worker_implementation/en/> (accessed on 7 May 2020). [↑](#endnote-ref-9)
9. UNAIDS Guidance Note. [↑](#endnote-ref-10)
10. See further various documents on the same: UNAIDS Guidance Note; NSWP, Briefing Note: Sex Work is not Sexual Exploitation, 2019 available at <https://www.nswp.org/sites/nswp.org/files/briefing_note_sex_work_is_not_sexual_exploitation_nswp_-_2019_0.pdf> (accessed on 7 May 2020). [↑](#endnote-ref-11)
11. UNDOC, Issue Paper: The Concept of ‘Exploitation’ in the Trafficking in Persons Protocol, 2015, available at <https://www.unodc.org/documents/human-trafficking/2015/UNODC_IP_Exploitation_2015.pdf> (accessed on 7 May 2020), p.8. [↑](#endnote-ref-12)
12. The so-called ‘Nordic Model’ which criminalises conduct of the client (the ‘buyer’) and decriminalises conduct of the sex worker still continues to lead to fear, stigmatisation and pushes sex work underground. As a result, sex workers often have to work in remote and unsafe locations to avoid arrest of themselves or their clients. These laws can undermine sex workers’ ability to work together to identify potentially violent clients and their capacity to demand condom use of clients. Criminalisation of the conduct of the client can leave sex workers very vulnerable to abuse and extortion by police, in detention facilities and elsewhere. Criminalisation also has resource impacts and detracts from tackling trafficking: funding resources are diverted from sex work organisations to anti-trafficking groups, resulting in an overall reduction of support. See further, UNAIDS Guidance Note. [↑](#endnote-ref-13)
13. A study in the Lancet suggests that decriminalisation of sex work could avert 33-46% of all new HIV infections globally in the next decade provided it was accompanied by sex worker-led interventions and community empowerment. (Shannon et. al. Global epidemiology of HIV among female sex workers: influence of structural determinants. Lancet Special Issue on HIV and Sex Work, 2015; 385: 55–71.) Modelling estimates also indicate that reducing violence against female sex workers (FSWs) can have a significant impact in reducing HIV among FSWs and adults in both generalized and concentrated epidemics; even when anti-retroviral therapy coverage is expanded, demonstrable impacts are observed, reaching 25–26% and 6% reductions in new infections among FSWs and adults, respectively. (Decker MR, Wirtz AL, Pretorius C, Sherman SG, Sweat MD, Baral SD, Beyrer C, Kerrigan DL. Estimating the impact of reducing violence against female sex workers on HIV epidemics in Kenya and Ukraine: a policy modelling exercise. Am J Reprod Immunol 2013; 69 (Suppl. 1): 122–132.) [↑](#endnote-ref-14)
14. Lucy Platt, Pippa Grenfell, Rebecca Meiksin, et al., Associations between sex work laws and sex workers' health: A systematic review and meta-analysis of quantitative and qualitative studies, PLoS Medicine, 2018, <https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1002680>; UNAIDS Guidance Note. [↑](#endnote-ref-15)
15. WHO, Consolidated Guidelines on HIV Prevention, Diagnosis, Treatment and Care for Key Populations, July 2016; UNDP, Global Commission on HIV and the Law: Risks, Rights and Health, 2018 Supplement. [↑](#endnote-ref-16)
16. On the fast track to ending the AIDS epidemic, Report of the Secretary-General, April 2016, available at <http://sgreport.unaids.org/pdf/20160423_SGreport_HLM_en.pdf> (accessed on 12 April 2018). [↑](#endnote-ref-17)
17. Ibid. [↑](#endnote-ref-18)
18. CEDAW/C/NOR/CO/9, 2017, paras 28-29; CEDAW/C/IND/CO/4-5), 2014, para. 22; CEDAW, 2003, “CEDAW Background paper concerning article 6” para. 12, 14. [↑](#endnote-ref-19)
19. CEDAW/C/CHE/CO/4-5, para 28-29; CEDAW/C/HUN/CO/7-8, 2013, para. 23e; CEDAW/C/ CAN/CO/8-9, 2016, para. 32, 33g; CEDAW/C/THA/CO/6-7, 2017, para 26-27. [↑](#endnote-ref-20)
20. CEDAW/C/ KHM/CO/4-5, para. 26, 27; CEDAW/C/IND/CO/4-5), 2014, para. 22. [↑](#endnote-ref-21)
21. CEDAW/C/NOR/CO/9, 2017, paras 28-29; CEDAW, 2003, “CEDAW Background paper concerning article 6” para. 12, 14. [↑](#endnote-ref-22)
22. CEDAW/C/VNM/CO/7-8, 2015, para. 21c. [↑](#endnote-ref-23)
23. CEDAW/C/NOR/CO/9, 2017, paras 28-29; [↑](#endnote-ref-24)
24. UNAIDS Guidance Note; Joint United Nations Programme on HIV/AIDS. UNAIDS Guidance Note on HIV and Sex Work. Geneva, 2009. [↑](#endnote-ref-25)
25. For instance, the DMSC sex worker “self-regulating boards” in India provide compelling evidence of reduction of trafficking and under-age sale of sex, through active involvement of sex worker communities, and self-regulation. DMSC, UNFPA, An innovative model anti-trafficking program with the inclusion of survivors of trafficking. Submission to the 2019 Thematic Report of OHCHR UN Special Rapporteur on TiP, on innovative and transformative models of social inclusion for victims of trafficking, 2019. [↑](#endnote-ref-26)