



# TRAFFICKING IN PERSONS REPORT

## JULY 2022





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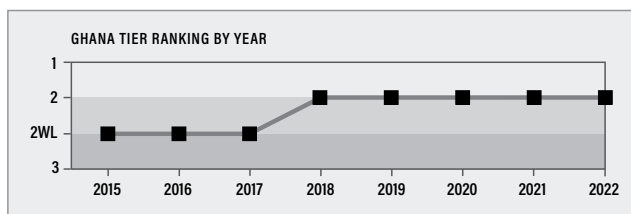


girls and women into sex trafficking, often through a faux romantic relationship; in 2020, approximately 25 percent of sex trafficking victims were coerced using this method. Additionally, in 2020, the government reported approximately 40 percent of traffickers were acquainted with their victim prior to exploiting them in sex trafficking.

Traffickers continued to target migrants and refugees upon arrival. In 2022, Ukrainian refugees, predominantly women and children, fleeing Russia's war on Ukraine are vulnerable to trafficking. Traffickers, namely Nigerian "madams," continue to fraudulently recruit and later coerce Nigerian women and girls to stay in exploitative situations using a "voodoo oath" they are forced to swear, while Nigerian "fraternities" increasingly recruit victims through force. The Nigerian and European mafias increasingly cooperate to facilitate human trafficking from Africa. Several foreign governments continue to report German citizens engage in sex tourism abroad. Labor trafficking victims are predominantly male and European, including from North Macedonia, Latvia, Ukraine, Bulgaria, Poland, and Romania but also from Afghanistan, Pakistan, and Vietnam. Increasingly Vietnamese criminal groups exploit Vietnamese victims in labor trafficking. Traffickers exploit victims of forced labor primarily at construction sites but also in hotels, seasonal industries like agriculture, entertainment, and restaurants, and in private homes, with reported increases in the number of child victims. Foreign workers are vulnerable to labor trafficking, particularly in meat processing plants, and especially when companies hire employees through subcontractors, who may have used fraudulent practices to recruit workers to the jobs. Traffickers with labor recruitment companies fraudulently recruit artists and musicians from Zimbabwe and Ethiopia with offers of fake jobs but instead force them to perform on the street and collect their earnings. Traffickers subject Roma and foreign unaccompanied children to sex trafficking, forced begging, and other coerced criminal behavior.

## GHANA: TIER 2

The Government of Ghana does not fully meet the minimum standards for the elimination of trafficking but is making significant efforts to do so. The government demonstrated overall increasing efforts compared with the previous reporting period, considering the impact of the COVID-19 pandemic on its anti-trafficking capacity; therefore Ghana remained on Tier 2. These efforts included identifying significantly more trafficking victims and increasing trafficking investigations. The government provided anti-trafficking training to law enforcement, judicial officials, community leaders, and service providers, and it held numerous public awareness raising activities. However, the government did not meet the minimum standards in several key areas. The government prosecuted fewer alleged traffickers and continued its 2017 ban on labor migration to Gulf states, which increased vulnerability to trafficking. Despite reports of fraudulent labor recruiters exploiting Ghanaian victims abroad, the government did not report holding any fraudulent recruiters accountable. A lack of adequate resources for law enforcement continued to hinder investigations and prosecutions, and shelter capacity for all victims remained insufficient. The government did not adequately address corruption in trafficking crimes, and it did not amend the anti-trafficking act regulations to remove the option of a fine in lieu of imprisonment in cases where the trafficker was a parent or guardian of a child victim.



### PRIORITIZED RECOMMENDATIONS:

Increase efforts to investigate, prosecute, and convict traffickers under the 2005 human trafficking law—including complicit officials and recruitment agents facilitating trafficking—and apply significant prison

terms as prescribed by law. • Amend the 2015 implementing regulations for the 2005 human trafficking law to remove the option of a fine in lieu of imprisonment in cases where the trafficker is a parent or guardian of a child victim. • Train law enforcement and judicial officials on identifying, investigating, and prosecuting trafficking cases under the 2005 human trafficking law. • Increase efforts to prevent exploitation of Ghanaian workers abroad, including by ending the ban on labor migration to Gulf states, implementing the 2020 National Labor Migration Policy, and ensuring workers do not pay any recruitment fees. • Increase funding and resources for law enforcement and streamline cooperation with the Department of Social Welfare to enable criminal investigations and victim identification. • Train law enforcement and service providers on the standard operating procedures (SOPs) to identify victims and refer them to services; implement the procedures in all regions. • Increase the quantity and quality of care available to victims, including by providing financial and in-kind support to civil society providing victims shelter and services. • Proactively screen for trafficking indicators among vulnerable populations—including Ghanaian women traveling abroad for domestic work, returning migrants, domestic and foreign workers on People's Republic of China (PRC) national-operated fishing vessels, and PRC national and Cuban overseas workers—and refer trafficking victims to services. • Increase cooperation between law enforcement and prosecutors on case development. • Improve data collection on law enforcement statistics and victim identification.

### PROSECUTION

The government maintained anti-trafficking law enforcement efforts. The 2005 Human Trafficking Act, amended in 2009, criminalized sex trafficking and labor trafficking. The Human Trafficking Act prescribed penalties of a minimum of five years' imprisonment, which were sufficiently stringent and, with respect to sex trafficking, commensurate with those prescribed for other serious crimes, such as rape. However, the 2015 regulations for this Act, which are non-discretionary and have the force of law, provided specific guidance on sentencing depending on the circumstances; in general, the term is not less than five years' imprisonment and not more than 25 years' imprisonment, but if a parent, guardian, or other person with parental responsibilities facilitates or engages in trafficking, they are liable to a fine, five to 10 years' imprisonment, or both. By allowing for a fine in lieu of imprisonment, these penalties were not commensurate with those for other serious crimes, such as rape.

Authorities initiated investigations of 108 trafficking cases in 2021, including 60 labor trafficking cases, 42 sex trafficking cases, and six cases where the form of exploitation was unknown, and continued investigating one sex trafficking case from the previous reporting period, compared with investigating 87 cases in 2020. In 2021, the government initiated prosecutions of 13 alleged traffickers and continued prosecution of one alleged trafficker. Courts convicted 14 traffickers under its anti-trafficking law, including two sex traffickers and 12 labor traffickers, with 11 traffickers (79 percent) receiving a sentence of at least one year of imprisonment. In some cases, the government prosecuted alleged traffickers under the Children's Act when there was insufficient evidence to attain a conviction under the anti-trafficking law. Courts prosecuted and convicted three defendants for exploitative child labor under the Children's Act of 1998; two of the three defendants were fined and did not receive prison sentences, and one defendant received the option for a fine in lieu of six months' imprisonment, which did not serve to deter the crime or adequately reflect the nature of the crime. This compared with prosecutions of 22 alleged labor traffickers and convictions of 13 labor traffickers in 2020. Despite reports of fraudulent labor recruiters exploiting Ghanaian victims abroad, the government did not report investigating or prosecuting any fraudulent recruitment cases. The government did not report cooperating with foreign counterparts on law enforcement activities.

The government did not report any investigations, prosecutions, or convictions of government employees allegedly complicit in human trafficking crimes; however, official corruption and complicity in trafficking crimes remained concerns, inhibiting law enforcement action during the year. Observers alleged that some traffickers operated with the support or acquiescence of law enforcement or justice officials and that some officials interfered in law enforcement proceedings, refused

to take action without a bribe, or attempted to intimidate civil society's reporting of trafficking cases. Some airport staff allegedly facilitated the transit of victims en route to exploitation.

The Ghana Police Service (GPS) and Ghana Immigration Service (GIS) had specialized anti-trafficking units. Government officials and NGOs reported the government did not provide sufficient funding and resources, facilities, or land and marine vehicles for anti-trafficking law enforcement operations. This, combined with a lack of shelter facilities in most regions, delayed investigations and operations to remove potential victims from exploitative situations. Inadequate evidence collection, weak collaboration between police and prosecutors, and a lack of experienced state attorneys further hampered prosecution of suspected traffickers. Judicial resources were concentrated in urban areas, leaving some victims in rural communities with limited access to the formal justice system. In collaboration with NGOs and foreign donors, the government provided extensive training to law enforcement, judicial officials, and frontline workers on trafficking definitions and legal concepts, investigative techniques, and victim protection. The government continued providing introductory anti-trafficking training for GPS and GIS recruits.

## PROTECTION

The government increased victim protection efforts. The government reported identifying and referring 727 trafficking victims to services in 2021, a significant increase compared with identifying 391 victims in 2020. This included 657 victims of labor trafficking, 64 victims of sex trafficking, and six victims where the form of exploitation was unknown. A majority of identified victims were children (578), and a majority were Ghanaian (577). Of the 150 foreign national victims, most were Nigerian, followed by Burkinabe and Ivorian nationals. NGOs identified an additional 94 trafficking victims, including 87 labor trafficking victims and seven sex trafficking victims, compared with 108 victims in 2020.

The government had SOPs to identify trafficking victims and refer them to services. However, officials did not consistently apply the SOPs, and observers reported limited resources and a lack of coordination between the government and civil society at times hampered implementation. District Department of Social Welfare (DSW) personnel accompanied local law enforcement on anti-trafficking operations and screened for potential victims; however, these teams reported to local governments rather than a centralized government entity. As a result, observers reported decentralization, lack of funding, and poor management impeded the DSW's effectiveness and sometimes resulted in inadequate and inconsistent treatment of victims. Officials referred all 727 victims to government shelter services or NGOs for care. The government operated one shelter for adult female trafficking victims, which provided care for 150 trafficking victims in 2021. The government, with an international organization's support, maintained a dedicated shelter for child trafficking victims, which provided care for 78 children. A government-run shelter for victims of child abuse could also accommodate child trafficking victims. There were no shelters for adult male victims, and most men received short-term housing and some medical and psychological assistance, followed by reintegration support. Government services for women and children included shelter, medical care, needs assessments, psycho-social care, education and skills training, interpretation for foreign national victims, assistance obtaining identity documents, registration with the national health service, and assistance during legal proceedings. Through its Human Trafficking Fund (HTF), the government expended 650,000 Ghanaian cedis (\$107,440) for victim services in 2021, compared with 590,000 cedis (\$97,520) for victim services and shelter renovations in 2020. Relying on private facilities operated by NGOs and faith-based organizations, the government referred most child trafficking victims to one of 11 privately-operated shelters that provided or coordinated provision of services. However, overall shelter capacity for child trafficking victims remained insufficient. Observers reported the government reintegrated child victims without conducting extensive home assessments. Foreign victims had the same access to care as Ghanaian victims. Foreign victims could seek temporary residency during legal proceedings and, with the Interior Minister's approval, permanent residency if deemed to be in the victim's best interest; officials did not report how many, if any, foreign victims it granted temporary or permanent residency. The government, often

in collaboration with NGOs and foreign donors, trained government and civil society protection workers on topics ranging from trafficking indicators and trends to case management and trauma-informed care.

Victim services were not dependent on cooperation with law enforcement proceedings. The government, in cooperation with NGOs, assisted victims who chose to participate in law enforcement proceedings against their traffickers by providing legal services, funding for lodging, transportation, and psycho-social support. Victims could provide video or written testimony, and some courts had child-friendly spaces that allowed child victims to testify from a separate room via video. Officials and NGOs reported that prolonged adjournments slowed prosecutions and impeded victims' participation, and officials did not always protect victims' confidentiality. Ghanaian law allowed trafficking victims to obtain restitution, and in one case, the court awarded two victims 1,000 cedis (\$165) each. Victims could file civil suits against their traffickers, but none reportedly did so.

## PREVENTION

The government modestly increased anti-trafficking prevention efforts. The Human Trafficking Management Board—the inter-ministerial committee mandated to administer the HTF, advise the Ministry of Gender, Children and Social Protection (MOGCSP) on anti-trafficking policy, promote prevention efforts, and facilitate the protection and reintegration of trafficking victims—met periodically. The Human Trafficking Secretariat, which coordinated anti-trafficking efforts under the MOGCSP, also met regularly with stakeholders on information sharing and implementation of the 2017-2021 anti-trafficking national action plan (NAP). The government drafted an updated 2022-2026 NAP and an accompanying communications strategy, which were both pending adoption at the end of the reporting period. The government allocated 1 million cedis (\$165,290) to the HTF for the government's anti-trafficking activities, including the NAP's implementation in 2021, the same amount allocated in 2020, and increased the 2022 HTF budget to 2 million cedis (\$330,580).

The government conducted trainings and public awareness-raising activities with government officials, civil society stakeholders, and community leaders at the national, regional, district, and local levels, often in collaboration with NGOs and international organizations. The government had a standardized trafficking data collection system in five regions, developed with an international organization's support; however, the system was not widely used. The MOGCSP operated a hotline in English and six local languages for victims of abuse, and it launched a mobile application for reporting gender-based violence crimes, including human trafficking; the government did not report identifying any trafficking victims or initiating any trafficking investigations as a result of the hotline or mobile application. The government did not report labor inspectors identifying any trafficking victims nor removing any children from exploitative labor situations, despite receiving training on child labor and trafficking. Insufficient funding, facilities, and transportation impeded labor inspectors' efforts to identify victims. The government had not yet implemented a forced labor training manual for labor inspectors, which was drafted with donor support during the previous reporting period.

The government regulated formal labor recruitment and required private employment agencies to register; it also provided pre-departure trainings for migrant workers, and the Ministry of Employment and Labor Relations and GIS screened for trafficking indicators. However, the government did not report investigating any labor recruiters for fraudulent recruitment or revoking agencies' registration for recruitment violations. The law did not prohibit worker-paid recruitment fees. Informal recruitment agencies continued to operate and facilitate recruitment through informal channels, and some agents used predatory tactics, including high recruitment fees and fraudulent job advertising. The government continued its 2017 ban on labor migration to Gulf states; the policy restricted Ghanaians' access to safe and legal migration, subsequently increasing their vulnerability to trafficking. The government's 2020 National Labor Migration Policy and its 2020-2024 implementation plan included provisions to prevent labor exploitation and increase Ghanaian embassies' capacity to assist migrant workers abroad and protect foreign workers in Ghana; the government's labor migration

technical working group held workshops and trainings to sensitize local government employees and social workers on the policy. The government did not make efforts to reduce the demand for commercial sex acts. The government provided anti-trafficking training to its troops prior to their deployment as peacekeepers; although not explicitly reported as human trafficking, there was one open case (submitted in 2018) of alleged sexual exploitation with trafficking indicators by Ghanaian peacekeepers deployed to the UN peacekeeping mission in South Sudan. The government did not provide the accountability measures taken, if any, by the end of the reporting period.

## TRAFFICKING PROFILE

As reported over the past five years, human traffickers exploit domestic and foreign victims in Ghana, and traffickers exploit victims from Ghana abroad. Traffickers exploit Ghanaian children in forced labor within the country in inland and coastal fishing, domestic service, street hawking, begging, portering, artisanal gold mining, quarrying, herding, and agriculture, especially in the cocoa sector. Traffickers exploit children as young as four in forced labor in Lake Volta's fishing industry and use violence and limited access to food to control their victims. Traffickers force boys to work in hazardous conditions, including in deep diving, and girls perform work onshore, such as preparing the fish for markets. Traffickers, including middlemen and relatives, recruit girls from other communities and subsequently exploit them in domestic servitude in the Lake Volta region, sometimes with parents' knowledge. Relatives often send girls via intermediaries to work in harsh conditions in forced labor in domestic work. Children in northern regions of Ghana, whose parents use intermediaries or relatives to send them to work in agriculture in the south during school breaks or the dry season, are at increased risk for forced labor. Ghanaian children who do not have access to school or who can attend only intermittently due to limited space and the double-track school schedule are also vulnerable to sex and labor trafficking. Observers noted the pandemic's impact on the economy and subsequent school closures increased child labor in Ghana, including in exploitative conditions. An NGO reported climate change has exacerbated vulnerability of Ghanaians migrating from northern farming communities to urban centers throughout the country in search of employment; girls and young women who work as *kayayie* (head-porters) are exploited in sex trafficking and forced labor, often through debt bondage, and men work in exploitative conditions as farm laborers and in mining, including in bonded labor. Women and girls who migrate to southern Ghana also reportedly do so to escape repressive cultural norms, including female genital mutilation and child and forced marriages, increasing vulnerability to trafficking. Traffickers subject Ghanaian girls, and to a lesser extent boys, to sex trafficking in urban areas and mining regions across Ghana.

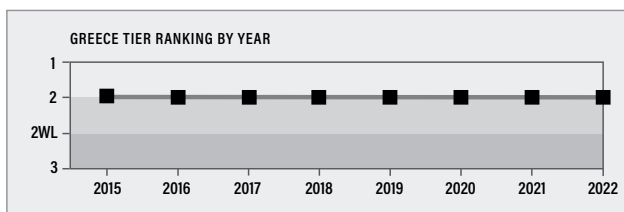
Observers allege PRC national-owned and -operated industrial vessels flagged to Ghana, often through shell companies, exploit Ghanaian workers in forced labor; one organization documented cases of abuse, including physical abuse, underpayment or nonpayment of wages, restricted medical care, and poor living conditions, against Ghanaian men aboard these fleets. An NGO estimated 90 percent of fishing vessels operating in Ghana are owned by PRC-based companies. Traffickers operating fishing vessels flagged to Ireland and the United Kingdom also exploit Ghanaian workers in forced labor, allegedly in cooperation with some Ghanaian recruitment agencies. Cuban nationals, including medical professionals, working in Ghana may have been forced to work by the Cuban government. PRC nationals working in Ghana may be in forced labor in the formal and informal mining sectors and in fishing. Traffickers exploit Ghanaian and Nigerian women and girls in sex trafficking in Ghana, including in mining regions, border towns, and commercial centers. Traffickers lure Nigerian women and girls to Ghana with the promise of good jobs and coerce them into commercial sex to pay exorbitant debts for transportation and lodging. Traffickers also exploit some Ghanaian and Nigerian labor migrants in commercial sex and demand more money for transit and documentation costs.

Traffickers exploit Ghanaian women and children in forced labor and sex trafficking in the Middle East, Europe, and other parts of West Africa. Unscrupulous agents recruit Ghanaian men and women seeking employment, transport them through North Africa, and exploit them in sex and labor trafficking in Europe and the Middle East. In one research study, an international organization reported the majority of Ghanaian

migrants recruited for employment in the Middle East are female domestic workers. Of the 113 returning Ghanaian domestic workers surveyed in the study, most reported their contracts lacked worker protection provisions, or in some cases, the contracts were verbal, vague, or contained false information. Nearly all of the Ghanaian domestic workers were employed directly by families, rather than through a company, and most reported the work did not match the recruiters' descriptions; workers reported traffickers seized their passports and physically and sexually abused them. Observers have reported registered and unregistered agents recruit Ghanaian workers and, with the assistance of some immigration or airport officials, facilitate their travel out of the country without the required exit documents. Ghana is a transit point for West Africans subjected to sex trafficking in Europe, particularly in Italy and Germany.

## GREECE: TIER 2

The Government of Greece does not fully meet the minimum standards for the elimination of trafficking but is making significant efforts to do so. The government demonstrated overall increasing efforts compared with the previous reporting period, considering the impact of the COVID-19 pandemic on its anti-trafficking capacity; therefore Greece remained on Tier 2. These efforts included prosecuting and convicting more traffickers and amending the trafficking law to again include forced begging as a form of exploitation. The government amended standard operating procedures (SOPs) for asylum claims to include specialized procedures for trafficking victims and provided robust training to first responders on victim identification and referral. The government established financial incentives for businesses to hire vulnerable unemployed individuals, including trafficking victims, and created a working group to simplify procedures to grant compensation to victims. The government increased overall prevention efforts, including partnering with civil society on multiple research projects. However, the government did not meet the minimum standards in several key areas. The government identified fewer victims and did not consistently screen asylum-seekers and undocumented migrants for trafficking indicators. Numerous, sometimes violent, pushbacks against undocumented migrants and asylum seekers discouraged potential victims from self-identifying or cooperating with authorities, according to reports from numerous credible sources. Anti-trafficking police and social workers did not conduct any joint inspections with labor inspectors in 2021. Government-run shelters continued to limit access to some victims for needed support, due to a lack of resources and space to provide assistance and accommodation from an increase in domestic violence victims during the pandemic. Court proceedings lasted two to six years, and the government did not provide services to mitigate this burden on victims or witnesses, thereby hindering their cooperation. Additionally, judges did not allow remote testimony and examined victims in person, even in cases where testimony could cause re-traumatization, and courts have never granted restitution or compensation to victims to date.



## PRIORITIZED RECOMMENDATIONS:

Vigorously investigate, prosecute, and convict traffickers, including complicit officials. • Increase proactive identification efforts for victims of forced labor and victims among vulnerable populations, such as unaccompanied children, undocumented migrants, refugees, and asylum seekers. • Conduct an independent investigation into allegations of forced returns of asylum-seekers to Turkey, some of whom were likely trafficking victims. • Strengthen rules and regulations to ensure immigration enforcement does not hinder human trafficking detection,



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