



Cope & Hope

Recommendations for stakeholders for the Social Integration of Third Country National Victims of Human Trafficking

COPE and HOPE - AMIF-2018-AG-INTE COPE and HOPE:
Practical approaches fostering social integration of TCN women victims of trafficking

Catarina Alves
Gender & Social Consultancy



This report was funded by the
European Union's Asylum,
Migration and Integration Fund



Asociación
Bienestar y Desarrollo
Entidad declarada de Utilidad Pública



Index

List of Acronyms and abbreviations	2
1. Introduction	3
2. Dimension 1: Regarding the stakeholders	5
3. Dimension 2: Regarding Legislative frameworks	7
4. Dimension 3: Access and guarantee of rights	12
5. Dimension 4: Community involvement and secondary stakeholders	15

List of Acronyms and abbreviations

(EU)	European Union
(AMIF)	Asylum, Migration and Integration Fund
(EC)	European Commission
(TCN)	Third Country Nationals
(VoHT)	Victims of Human Trafficking
(GBV)	Gender Based Violence
(NGO)	Non-Governmental Organization

1. Introduction

Cope & Hope is a European project funded by the European Commissions' Asylum, Migration and Integration Fund (AMIF), taking place between January 2019 and February 2022. This project is managed by a consortium of 3 entities, two from Italy – Fondazione ACRA and Passepartout Consorzio di Imprese Sociali and one from Catalonia, Spain – Associació Benestar i Desenvolupament. The project aims at the analysis, pilot implementation, capitalization, sharing, and dissemination at local and EU level of best practices aimed at the emotional, social, and economic inclusion of Third Country National (TCN) women victims of human trafficking (VoHT), with 3 expected outcomes:

- 1) Pilot implementation in Barcelona and Milan of an **assistance and rehabilitation model** tackling emotional and psychological obstacles to integration in the hosting society of TCN women victims of trafficking: they will be involved in a multi-dimensional rehabilitation process (health, psychological and artistic therapy) aimed at healing their physical and emotional wounds.
- 2) Pilot implementation in Barcelona and Milan of a **model supporting the social and economic integration of TCN women victims of human trafficking and violence** and their families in the hosting society. The model will offer language training, job orienteering services, skills, and competencies enhancement opportunities to foster the autonomy of TCN victims of trafficking.
- 3) **Capitalization and dissemination at local and European level of identified practices aimed at the integration of third-country national women victims of trafficking and their families.** A desk analysis will feed the definition of the pilot model (WP2 and WP3) and it will be capitalized at the national and EU level through an awareness campaign, recommendations, and multi-stakeholder event.

The current report corresponds to the last expected outcome from the Project, which complements the previous Lessons Learnt report, positioning recommendations from a broader perspective than the individualized perspective detailed in the previous report.

The consequences of trafficking and exploitation on the mental health and the socio-economic conditions of the victims require a specialized and multidisciplinary intervention that can comprehensively respond to these multiple layers of intersecting human rights violations. All stakeholders involved are, therefore, responsible for adapting their intervention to this reality, raise awareness towards other stakeholders and society in general, as well as promoting dialogues which can influence political decisions directed at a full assistance to victims of trafficking in each country.

This report is organized under 4 dimensions:

Dimension 1: Regarding the stakeholders

This dimension presents a brief comment about the main concerns identified throughout Cope & Hope project regarding the role of stakeholders in the process of detecting and assisting VoHT. Being Trafficking such a complex crime, the implication of multiple-level stakeholders is essential, as well as shared methodologies which may facilitate assistance, all under the frame of public policies centred on the restitution of the rights of the victim.

Dimension 2: Regarding Legislative frameworks

Trafficking constitutes a transnational crime but the exploitation of women and girls takes place within certain borders where concrete legislation applies. Although the European Commission Directive 2011/36/EU obliges Member States who have opted into the Directive to set up systems for the early detection, identification and assistance to victims, each European country developed specific legislation, public policies and assistance services, which leads to heterogeneous responses to victims depending on the country and even Municipality where the victim is detected and assisted.

This dimension explores the legislative frameworks of Italy and Spain and provides some recommendations for improvement.

Dimension 3: Access and guarantee of rights

This dimension explores the ways under which the rights which assist VoHT are guaranteed by public policy and stakeholders in order to ensure the full completion of such rights, fundamental to ensure women's' recuperation.

Some recommendations are drafted both at national, regional and stakeholder level.

Dimension 4: Community involvement and secondary stakeholders

Secondary stakeholders, and the community in general, often have direct contact with VoHT without having the tools to detect them or support them in their processes. This dimension provides recommendations to improve awareness in the social and community scope.

2. Dimension 1: Regarding the stakeholders

2.1 Main concerns

Both in Spain and in Italy there are all sorts of possible levels of intervention with victims of trafficking and a wide range of direct stakeholders intervening, from NGOs, Municipal services, police forces and others. These stakeholders work not only in networks with different levels of formality, but also often in a hierarchical position organized around those who control more resources (economic and others) or have the power to determine the possibilities of other stakeholders, as it is the case with programs who are subsidized by municipal funding, for example.

Understanding that this is the most common frame of action, it also seems relevant to point out that this type of model, although in its' design seems to be the most adequate to address the multiplicity of issues surrounding assistance to trafficking victims, is often blocked by bureaucratic issues which hinder the intervention, making it unstable and depending on intermittent funding. Adding to this, such model does not necessarily benefit the VoHT whose needs' satisfaction is disputed over a range of services with more or less continuity.

On the other hand, the complexities involving the crime of trafficking, being those legal aspects, issues related to the exercise of forced prostitution, issues regarding the satisfaction of basic needs, etc., often demand for a set of responses which go beyond the possibilities of a single response and demand a multiple level intervention. Attending to what was mentioned in the previous paragraph, it is often the case that the distribution of the several resources needed is not always granted in a comprehensive and coherent manner and that the victim is made responsible to have to search resources for herself and articulate between them, especially in regions with lower integrated services under a common trafficking plan or public policy.

Finally, it is also noticed that there is some insufficient awareness of many stakeholders and lack of training in detection and intervention with victims of Trafficking by the report *Residence permits, international protection and victims of human trafficking* (2021)¹, which adds "there remains insufficient capacity, as well as a lack of awareness amongst many stakeholders. This is coupled with a shortage of resources and interpreters."(p.64). Such constataions are also revealed in assistance practices in both Spain and Italy where, except for the NGO's specialized in this topic and having worked on this area, there is a generalized lack of knowledge and strategies to detect and address women VoHT.

Taking all the previous into account, we draft the following recommendations:

2.2 Recommendations

- ✓ Given the volatility of the tendencies of Trafficking regarding forms of exploitation, cities and regions where it takes place, forms of coercion, types of violence, value of the debt and others,

¹ Schlintl, L. & Sorrentino, J. (2021), *Residence permits, international protection and victims of human trafficking*, REST project

it is paramount that stakeholders perform regular research studies which can inform both public policy and practice to best adapt to the reality;

- ✓ Public policy and public financing should guarantee the stability of resources in terms of funding, tasks and responsibilities and in terms of the stability of the professional involved in direct assistance;
- ✓ Stakeholders, regardless of their position on the network of stakeholders, should ensure coordination amongst them, developing trust bonds and keeping the victim's needs in the centre of the intervention;
- ✓ Frontline stakeholders should establish together the priorities to attend to at every local level, to minimize the duplicity of interventions and maximize efficiency, answering to the needs detected.
- ✓ Stakeholders are responsible for displaying strategies to both raise awareness on issues of trafficking and disseminating their activities to tackle it, in order to motivate the society and other stakeholders to participate, directly or indirectly.
- ✓ Frontline stakeholders should receive adequate training in detection and intervention with victims of Human Trafficking, as well as be involved in awareness raising activities aiming at contributing for a common discourse in society regarding this topic.

3. Dimension 2: Regarding Legislative frameworks

3.1 Main concerns

European framework

Human Trafficking constitutes a transnational crime according both to International law, European law and both Spanish and Italian legislation.

The first time that the United Nations refers to Trafficking in Human beings for the purpose of sexual exploitation was in the United Nations Convention for the Suppression of the Traffic in Persons and the Exploitation of the Prostitution of Others, from December 1948, as a response to the very high number of migrations around the Globe after the II World War. Human Trafficking is hence included in the Human Rights charter to classify this flow particular of people as an attack against Human Rights.

After this, in the second half of the XX Century several International Treaties have referred to the Trafficking of Human Beings, of which they have been ratified by Spain and Italy:

- The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979);
- The Council of Europe Convention on combating trafficking in human beings (Convention 197 of the Council of Europe – Warsaw Convention 2005)
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocols), 2000;
- Framework Decision 629/2002 of July 19 of the European Union on the Fight against Trafficking in Human Beings.
- Directive 2012/29/EU of the European Parliament and of the Council, of October 25, 2012

Specifically regarding the protection of rights, the support and the protection of victims of crime in which victims of trafficking are included, Directive 2012/29/EU of the European Parliament and of the Council, of October 25, 2012, establishes minimum standards for Member States to guarantee victims of crimes before, after and during criminal proceedings, their right to fair treatment. respectful, without discrimination of any kind. Likewise, it guarantees information about your rights; It ensures the protection of their privacy and their physical and mental integrity, and, finally, guarantees the victim the necessary support to recover after the criminal process.

Spain

The 2021 Trafficking in persons report regarding Spain (US Department of State, 2021) understands that “the Government of Spain fully meets the minimum standards for the elimination of trafficking (...) These efforts included assisting more trafficking victims, opening a new trafficking shelter, increasing efforts and results regarding international investigations, and continuing to issue significant prison terms for convicted traffickers.”

Nevertheless, this same report acknowledges some remaining gaps regarding victim identification protocols and the lack of a national anti-trafficking action plan to guide its efforts. In fact, in

Spain, there is still no Comprehensive Law to address Trafficking in Persons, so the legislation that offers protection to victims is scattered among various forms of legislation.

The crime of Trafficking is established under article 177 bis of the Penal Code with a sentence of between 5 and 8 years in prison.

In relation to the protection of victims, the following legislation should be highlighted:

1. Organic Law 4/2000, of January 11, on the rights and freedoms of foreigners in Spain and their social integration: Article 59 bis: "Victims of human trafficking are recognized and exempted from responsibilities;
2. Law 4/2015, of April 27, on the Crime Victim Statute and Royal Decree 1109/2015, of December 11, which develops this Law and regulates Crime Victim Assistance Offices;
3. Royal Decree Law 3/2013, of February 22, which modifies Law 1/1996, of January 10, on free legal assistance and which recognizes the "right to free legal assistance, which will be provided immediately, to victims of gender-based violence, terrorism and human trafficking in those processes that are linked, derive or are a consequence of their condition as victims, as well as minors and people with mental disabilities when they are victims of situations abuse or mistreatment";
4. Royal Decree of September 14, 1882, approving the Law of Criminal Procedure that Articles 109, 110 and 544 bis also apply to VTSH and refer to the possibility of the victim to appear as a party in the process (appear, be heard and that their opinion be taken into account at all stages of the process), to repair the damage (compensation for the damage caused) and the possibility of judicial adoption of precautionary measures such as the prohibition of approach or communication of the alleged offender with the victim or her/his family.

Besides this, Spain has also established since 2008 National Plans for fighting Human Trafficking and a Framework Protocol for the protection of victims of human trafficking which is based on the protection of the Human Rights of the victims and prioritizes the assistance and protection of the victims, ensuring assistance of a multidisciplinary nature and ensuring recovery and physical, psychological and social rehabilitation.

Although in the whole territory of Spain the identification of a victim of trafficking must be based on the existence of reasonable grounds or evidence that a person is a potential victim, the existence of eighteen autonomous regions in Spain with their own police forces, support services and local legislation leads to a diversity of ways and services to assist victims: some with the support from local governments or municipalities, others depending on NGO's and associations, this often means that the guarantee of victims' rights may depend on the region where she is assisted and the relevance given to trafficking on each region and also on the level of expertise of professionals both in detection and recuperation of victims.

The lack of a comprehensive law facilitates this dispersion and does not necessarily guarantee support in equal terms for all the victims. This issue is also mention in the Trafficking in persons report

from 2021 (US Department of State, 2021) which recommends expanding victim service centres to all autonomous communities.

It also has to be noticed that, as mentioned before, “there is no requirement of a formal complaint by the victim, nor the formal initiation of judicial proceedings. The specialised anti-trafficking police unit is competent both for victim identification and for preventing and investigating trafficking. Upon the detection of THB indicators, the police decide whether to initiate a formal identification process. Should it be decided to do so, a specialised NGO must be engaged to provide victim support. In practice, however, sometimes a strict law enforcement approach may prevail, and identification may depend on a victim’s collaboration and ability to provide information to enable the initiation of a criminal investigation” (Schlinter, L. & Sorrentino, J., 2021, p.64).

On the other hand, it is observed that the Gender based violence law existing in Spain does not formally include Human Trafficking as a form of gender based violence which would provide the victims with specific measures such as economic support and specialized services. This is also why the 2021 Trafficking in persons report (US Department of State, 2021) recommends that Spain should improve state compensation mechanisms for the victims, including re-distribution of confiscated traffickers’ assets to victims, since victims fall out of the compensation mechanisms given to victims of gender based violence in most cases.

Italy

Regarding Italy, since 2003 that this country has included human trafficking as an offense in the Italian Criminal Code (article 601) by Law No 228/2003, although “both before and after 2003, some cases of trafficking in persons have been prosecuted under the offences of 'slavery' (article 600 of the Italian Criminal Code) and 'trade of slaves' (article 602), which have been amended by Law No 228/2003.”² “Pursuant to the Italian Criminal Code, anyone who commits trafficking in human beings shall be liable to a term of imprisonment of 8 to 20 years. However, penalty is harsher if the offense is perpetrated against minors”

Trafficking in human beings is, therefore, expressly punished in the Italian legal system by the entry into force of law no. 228 of 2003 with which the articles of the penal code relating to reduction to slavery were rewritten (articles 600, 601 and 602).

The definition of the conducts punishable by way of trafficking was then expanded by legislative decree no. 24 of 2014 which also paid attention to the compensation profile of the victims. The circumstances that lead to an increase in penalties in the event of the commission of these crimes have been modified by law no. 108 of 2010 which inserted art. 602-bis.

With the legislative decree n. 24 of 2014, the compulsion to carry out illegal activities involving exploitation or to undergo the removal of organs was added.

² https://ec.europa.eu/anti-trafficking/italy-2-institutional-and-legal-framework_en

To then define the incriminating case more strictly, it is specified that the reduction or maintenance in the state of subjection can take place in the presence of a particularly characteristic conduct. In particular, the conduct is required to be implemented through:

- violence, threats, deceit;
- abuse of authority or taking advantage of a situation of physical or mental inferiority or a situation of necessity; the 2014 reform added "taking advantage of a situation of vulnerability";
- by promising or giving sums of money or other advantages to those who have authority over the person.

Also Article 18 of the 1998 Spanish Immigration Law establishes that six-month temporary humanitarian residence permits may be issued to foreigners needing protection and assistance. The residence permit is renewable for one year and may be converted into a residence permit for education or work.

Unlike Spain, Italian does not provide for a reflection period for victims of trafficking, but all the victims participating for a three-month period in the programme established by Art. 13 of Law No 228/2003 may not be deported and can therefore decide whether to participate also in the programme established by Art. 18 of Legislative Decree No 286/1998 and, in this case, cooperate with the Italian judicial authorities. However, and just like in Spain, obtaining a temporary residence permit in Italy is not conditional upon the victim's willingness to cooperate with law enforcement or judicial authorities.

On the other hand, and also unlike Spain, Italy has implemented a nation-wide mechanism of referral (*meccanismo di referral*), which establishes the tasks of each subject (institutional and non-institutional) in relation to the measures that must be put in place, in accordance with the provisions of current legislation, for the assistance and protection of victims of trafficking.

This mechanism is defined under the definition provided by the UNHCR, Refugee Protection and Mixed Migration: 10 Point Action Plan³:

Coordination and reporting mechanism, possibly standardized, of the person and their specific needs to the competent authorities or services, or to the subjects who can better respond to the identified needs, in compliance with the confidentiality of information and the consent of the persons concerned.

Hence, this system requires all the parties involved to collaborate and communicate through reporting procedures, in a multi-agency and multi-sectoral approach, making it possible to facilitate reporting to specialized bodies - from the moment of arrival or by the reception centres in the first instance and, where this has not happened, by the Territorial Commissions - of persons requesting international protection for whom there is reasonable doubt that they may be victims of trafficking or who may become

³ UNHCR, Refugee Protection and Mixed Migration: 10 Point Action Plan, reperibile all'indirizzo http://www.unhcr.it/wp-content/uploads/2015/12/10-Point_Plan_in_Action.pdf

so and therefore to favour their correct identification and consequently adequate assistance and protection.

Regardless all the efforts developed by Italy in tackling Human Trafficking, the Trafficking in persons report from 2021 (US Department of State, 2021) mentions that this country still “does not fully meet the minimum standards for the elimination of trafficking but is making significant efforts to do so.” Among the main weaknesses detected are:

- “The national victim identification and referral mechanism was implemented unevenly throughout the country and was not always consistently effective.
- The government did not adopt a new national action plan, appoint a national rapporteur, or award restitution to any victims.”

3.2 Recommendations

- ✓ In Spain it is recommended to raise awareness about the importance of establishing a comprehensive law which includes all forms of Human Trafficking, establishing a homogeneous system for victims’ support and including all sorts of resources (housing, assistance, etc.) with specialized professionals, at a national level;
- ✓ In both countries it is recommended that victims’ access to services is not in any way conditioned to their will to denounce their victim situation and that this is respected and enforced among the police forces;
- ✓ It is recommended that a broad concept of victim cooperation is adopted, requiring a low cooperation threshold from victims of trafficking, to avoid revictimization and reliving traumatic situations. The weight on the victim can be substituted by a credible and informed report submitted by the person or by a supporting NGO acting on behalf of the victim;
- ✓ Ensure Trafficking for labour exploitation is investigated and prosecuted as a trafficking offense and not pursued as an administrative labour code violation or other lesser crime;
- ✓ Ensure that Trafficking for means of mixed forms of exploitation (sexual exploitation and begging or sexual exploitation and labour exploitation, for example) is investigated and prosecuted;
- ✓ Continue to increase international cooperation with source and transit countries, especially Nigeria, Tunisia, Libya and Morocco, on information sharing and countering trafficking rings;
- ✓ Appoint a national rapporteur group to conduct continuous studies to provide an independent review of government efforts;

4. Dimension 3: Access and guarantee of rights

4.1 Main concerns

Although all previously analysed legislation establishes a set of services to assist victims of Trafficking, it has been understood that some of these services are insufficient both in Spain and in Italy. Some of the most mentioned were:

- a) Economic support for the victims that is enough to allow them to participate actively in recuperation programs;
- b) Lack of specialization of generic social and health services which hinders the detection of victims of trafficking in all sorts of settings

In fact, the lack of **economic provisions and satisfaction of basic needs** is deterrent to successful individual processes of victims, as well as having access to housing and protection, as deeply explained in the Cope & Hope Lessons learnt report. As stated in this report, although the access to resources must be guaranteed for all socially vulnerable groups, in the case of trafficked women, the strong psychological impact of trafficking added to the precarious socioeconomic situation worsens most women's psychological capacity to invest in a long-term plan such as training and preparation for the labour market.

Other right which assists women VoHT is the right to safety and confidentiality, which still lacks a homogeneous approach from all stakeholders at all geographic levels, regarding issues such as:

- **Data share:** Which type of data should be shared and with which stakeholders?
- **Group intervention:** When is it adequate to gather several women VoHT and how to ensure confidentiality in these situations?
- **Risk assessment:** How to establish adequate risk assessment tools aimed at women VoHT and what procedures should be implemented in case of medium to high risk?
- **Protection:** In case of danger, what mechanisms of protection are there available for women VoHT and how were these mechanisms

These aspects and the answer to these questions are still unresolved concerns in both countries, not clearly stipulated and unified neither in Italy nor in Spain.

Other types of rights which must be ensured are those related to the **legal status of the victims**, as explained in the previous dimension regarding legal aspects. Along these lines it seems relevant to mention that according to the Trafficking in persons report from 2021 (US Department of State, 2021), in terms of guarantee of rights it is observed that, in Italy, "many victims applied for asylum upon arrival rather than protection as a trafficking victim, either through pressure from their trafficker or believing that asylum status afforded greater freedoms, more immediate access to employment and services, and long-term residency". This aspect has an impact on the types of services women access to and may keep

women away from projects like Cope & Hope where they could have access to full recovery processes and hinders access to specific rights for VoHT.

Regarding Spain, the Trafficking in persons report from 2021 (US Department of State, 2021) identifies gaps in victim identification protocols, which results, in 2021, in the government identifying fewer victims. Additionally, it is identified that the Spanish government continued to lack a **national anti-trafficking action plan** to guide its efforts and therefore recommended that Spain adopts and implements one “comprehensive national action plan that addresses both sex and labour trafficking and clearly outlines the roles of law enforcement and victim care providers”.

Finally, and although many other rights could be addressed, it seems pertinent to address the rights regarding receiving a **specialized assistance from multidisciplinary teams of trained professionals** who can respond to the multiplicity of consequences raised by Trafficking, ensuring a process of recuperation and reparation. Both in Italy and in Spain such teams comply with these standards but it is also noticed that the number of specialized professionals is insufficient. It is also noticed that a homogeneous and official training to such professionals is lacking, across cities, regions or countries, which means that each stakeholder usually adapts or develops their own training.

4.2 Recommendations:

- ✓ Economic support to VoHT must not be conditioned by the victims’ performance or collaboration as this support constitutes a right and not a reward and her unwillingness to do so does not hinder the support process she is entitled to proceed;
- ✓ A common training to all professionals of the social field in detection of victims of Trafficking, psychological first aid and knowledge of specialized services to refer victims to should be designed and enforced at a macro level;
- ✓ It should be guaranteed that victims are completely informed about all possibilities, including that of having access to a recovery and reflection period, a temporary residence permit and the possibility of requiring asylum, protection, or safe return to their home country;
- ✓ The victims’ best interests should always remain at the centre of the intervention, ensuring to include her voice, opinions, needs and understandings of her situations in all measures being developed to assist her;
- ✓ The access to full citizenship rights should be guaranteed, such as socio-economic rights, social inclusion, housing and access to the labour market. Further, concrete policies regarding the inclusion of VoHT in the labour market should be developed at national level, either through affirmative action, specialized programs and adaptation of generic programs directed to vulnerable groups to include VoHT;
- ✓ Awareness rising activities and campaigns should focus on speeding up the access of victims to legal status in the arriving country that allow them to enter the labour market, in order to prevent

their participation in the underground economy where they can be re-victimized and exposed to all sorts of violations of rights. This is also important for the maintenance of mental health.

- ✓ It is recommended to develop strategies to approach the police work among the victims and the social perspective, providing training and communication tools that are adapted to establishing trust with the victims.

5. Dimension 4: Community involvement and secondary stakeholders

5.1 Main concerns

Trafficking operates in the underground economy and hidden from most of the society, except from those who directly benefit from the exploitation of women. Although constituting a form of gender based violence, this crime is often absent from the social narrative regarding GBV which usually focuses more on intimate partner violence in both Italy and Spain. This contributes to the perpetuation of stereotypes surrounding the victims and to the absence of knowledge and tools to detect and address Trafficking from the part of secondary stakeholders⁴ and the society in general. Health, Social and other citizenship services often have direct access to VoHT who pass undetected, which can be understood as a form of institutional violence since the victims' rights are not being guaranteed.

Also, secondary stakeholders usually work in networks, some formal and some informal, where the unevenness of knowledge about Trafficking may hinder a comprehensive approach to the victims' well-being. In the concrete case of police forces, for example, a key stakeholder often repelled by VoHT for fear of deportation or of criminalization, it is often the case that the relationship with other stakeholders is less fluid than in the case of socially-directed stakeholders.

5.2 Recommendations

- ✓ Secondary stakeholders and the community, in general, should have basic training and be aware of the reality of Trafficking in order to better detect VoHT as well as to better contribute for their social integration;
- ✓ Although it is relevant that all stakeholders work in networks, it is recommended to avoid multi-intervention as it is often confusing for the victims and can revictimize women. It is therefore recommended that although working in a network, community services, secondary stakeholders and main stakeholders are able to define clearly a referent service for each victim;
- ✓ It is recommended to work on strengthening interagency coordination and partnerships with civil society.
- ✓ A multiple-agent/stakeholder approach to Trafficking requires coordinated plans which guarantee that the victims' needs are at the centre of the intervention and demands for coordinated public policies at regional and country level.

⁴ Secondary stakeholders can be defined as those people or entities that do not engage from an expert position in direct support of victims of Trafficking, although having direct contact with them.