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**Dean, Laura A.**

**2016**

**https://doi.org/10.25595/3447**

**Veröffentlichungsversion / published version**
**Zeitschriftenartikel / journal article**

**Empfohlene Zitierung / Suggested Citation:**

Dean, Laura A.: *The Role of Anti-trafficking Organizations in Human Trafficking Policy Implementation*, in: Femina politica : Zeitschrift für feministische Politik-Wissenschaft, Jg. 25 (2016) Nr: 1, 79–92. DOI: https://doi.org/10.25595/3447.

**Erstmalig hier erschienen / Initial publication here: https://doi.org/10.3224/feminapolitica.v25i1.23411**

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BERLIN

HUMBOLDT-UNIVERSITÄT ZU BERLIN

# The Role of Anti-trafficking Organizations in Human Trafficking Policy Implementation

LAURA A. DEAN

Anti-trafficking organizations have played an integral role in the implementation of human trafficking policies in the post-Soviet region. The lack of government infrastructure, bureaucracy, and administrative reforms impeded implementation of trafficking policies and non-governmental organizations (NGOs) and international organizations (IOs) were there to pick up the slack. These organizations exist in authoritarian and semi-authoritarian regimes and have been influential in the policy development and implementation processes. Due to the fact that NGOs and IOs were among the biggest stakeholders in these countries pushing for legislation, this earned them a seat at the table in most countries during policy implementation. Consequently, this article seeks to determine how non-governmental organizations and international organizations act in forming norms and values contributing to the implementation of international law into national law. It also examines how different constraints in three countries of the Post-Soviet region influence NGO and IO strategies with policy implementation.

The data for this article were gathered during fifteen months of fieldwork in Ukraine, Latvia, and Russia in 2012-2013 and a follow-up trip in July-August 2015 to Ukraine. This fieldwork determined the situation on the ground within the policy subsystem concerning implementation on the national level. I utilized a most similar case study comparison of three countries in the post-Soviet region, Ukraine, Latvia, and Russia. Since the adoption of the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (United Nations 2000), countries around the world have expedited their own national policy responses in order to comply with Article Nine, which states that countries must adopt their own policies and programs to prevent and combat trafficking. Consequently, all of the countries in the post-Soviet region support anti-trafficking initiatives through some combination of policy tools on the international and national levels. Ukraine, Latvia, and Russia were chosen as most similar case studies because they have similar historical, political and economic attributes and represent the outliers in the region with respect to human trafficking policy. In terms of policy variation, Russia has the most limited trafficking policy and is the only country in the region that has only one policy tool, a criminalization statute that criminalizes human trafficking. Conversely, Latvia has three policy tools, criminalization statutes, national action plans that outline a distinct policy identifying how the government will work to fight human trafficking and decrees. Ukraine has four policy tools: criminalization statutes, national action plans, decrees, and a national law. Process tracing, participant observation at anti-trafficking NGOs, interviews, and items gathered on the ground such as policy documents and archival data uncovered implementation efforts. The

interviews were semi-structured and open-ended with governmental representatives and stakeholders from key ministries, civil society organizations, academics, and international partners working with the issues surrounding human trafficking. These interviews were triangulated with various data sources I obtained from archives, newspapers, and government documents in order to determine the accuracy of the interviews and control for bias.[1] Interviews were coded using Computer Assisted Qualitative Data Analysis Software (CAQDAS), MAXQDA 10 to determine the overall themes related to policy implementation.

## The Role of Organizations in Policy Making

Women's organizations have been active in the policy making process around the world. Their work through transnational feminist networks (Moghadam 2005) has been extensively discussed in the literature (Johnson 2009; Tripp 2006; Mohanty 2003). The amount of influence that these organizations have depends on their thematic area as refugees organizations have been more successful in their lobbying efforts in the international area than environmental NGOs or those working with HIV/AIDS (Gordenker/Weiss 1995). The literature discusses the range of work that many of these organizations do from the transnational to the sub-regional levels. However, Gordenker and Weiss argue that "the fundamental effect on nongovernmental organisations has to do with access, which has become progressively broader and deeper" (Gordenker/Weiss 1995, 544). This demonstrates that the work of NGOs is significant at different levels of governance but this work can be stymied by barriers to government access or by an unresponsive government. When local NGOs do not receive the access to the government that they are hoping for, through transnational advocacy coalitions, they can apply pressure on their government, a process categorized as the boomerang effect (Keck/Sikkink 1998). Governments increasingly rely on feminist NGOs for their expertise in program administration and subcontract NGOs to carry out government programs.This collaboration can threaten NGOs' ability to criticize the government and advocate for better programs (Alvarez 1999). In the post-Soviet region, women's participation in non-governmental organizations has been established, as many were shut out from formal political participation and processes after the transition to democracy (Gal/Kligman 2000). In fact, negative perceptions of feminism have impeded the women's movement in Eastern Europe, which coupled with the fact that NGOs have no united agenda, which has impeded their influence (Sloat 2005). Women's organizations in Russia in the late 1990s and early 2000s "lack[ed] mechanisms for effective dialogue with levels of government that would allow their voices to be heard in public policy discussions" (Sundstrom 2002, 218). Thus, the intermittent victories with Russian NGOs occurred because there was an ally of the women's movement within the government such as a Member of Parliament or regional administrator, and not because of a government commitment to women's issues (ibid.). My research examines how non-governmental

organizations and international organizations act in forming norms and values contributing to the implementation from international law into national law. It shows that women's organizations, if they were able to survive the adoption of the foreign agents law, have managed to exert some influence on government councils and working groups in Ukraine, Latvia and in Russia especially on the regional level. Women's and human rights NGOs in Eastern Europe brought the issue of domestic violence to the forefront after the fall of communism and would never let it go (Fábián 2010). These non-governmental organizations have been categorized as hybrid organizations because they lack a grassroots approach, are financed from international donors, and are not true members of civil society (Hrycak 2006). This means that they are in unique place, offering necessary services the government cannot provide, which allows them unique access to government officials during policy implementation.

My research contributes to this discussion by examining the work of hybrid women's NGOs in the post-Soviet region related to human trafficking. I assess the challenges and opportunities of these organizations working as norm entrepreneurs and determine that they are integral to policy implementation related to human trafficking as they monitor implementation, build and shape anti-trafficking institutions, and strengthen government capacity. This demonstrates that similar to refugee organizations, anti-trafficking organizations have been able to exert influence in the implementation of human trafficking policies despite numerous constraints. Thus, the findings suggest that human trafficking is a thematic area where organizations can exert their influence. The data also support Alvarez's (1999) notion, that these organizations must balance a fine line between subcontracting government programs while criticizing and advocating for better programs. In the cases presented the NGOs and IOs work within a system of constraints that impede influence but many times they are successful at exerting their influence. While there was no concerted government commitment to women's issues as Sundstrom (2002) explains, my findings suggest that NGOs and IOs can still attain policy implementation victories since they facilitated the adoption of the policies and monitor their implementation. Therefore, although the governments in Ukraine, Latvia, and Russia did not demonstrate a commitment to women's issues, the organizations there have helped guide implementation and overcome barriers to their participation in the policy process. Based on these theoretical considerations, the next section will examine the different kinds of NGOs and IOs in each case more closely and their advocacy work transforming norms and values from the international arena to the policy subsystem on the national level.

## Post-Soviet Anti-trafficking Organizations

All three cases present a unique blend of NGOs and IOs that work to influence policymaking. In Ukraine, international organizations such as the International Organization for Migration (IOM), Organization for Security and Cooperation in Europe, and International Women's Rights Center La Strada operate on the national level

and attempt to influence legislation and policymaking. However, because they are national level affiliates of international organizations they lack nation-wide influence as they do not have member offices at the regional and local levels. Instead, local NGOs in the regions operate as their affiliates and all three organizations have partner NGOs on the regional level. Thus, in Ukraine international norms and values are passed through these international organizations to the local NGOs through networks created by the international organizations so when the international organizations use their influence, they are backed by a number of local organizations around the country working on the issue.

In Latvia two local NGOs work on the issue of human trafficking. These NGOs provided services to victims when the government could not afford to implement policies and, as a result, the responsibility of providing these services fell to the non-governmental organizations (BISS 2005, 37). As members of the government-supported working group, they have the ability to influence and change policy as they have direct access to the government. However, there are still feelings of animosity between the government and NGOs that criticize them. Ēriks[2] a national government official said "NGOs make the situation seem worse to get extra funding for themselves, they say that everything here is bad, that Latvia is full of victims, because they need the money and government grants" (Interview, 2013). This mistrust on both sides lessens the influence of the NGOs in Latvia on policymaking. There is also a lack of cooperation between the two anti-trafficking NGOs in Latvia, which stems from the fact that only one of the NGOs has the government contract to rehabilitate victims. Thus, there is competition amongst the two NGOs to obtain the contract, which results in bureaucratic problems and delays in care for the victims (TIP 2013, 231). These factors all lessen the impact that NGOs in Latvia have on policymaking and demonstrate that, even though they are members of the anti-trafficking working group with policymakers, they still struggle to make themselves heard and influence human trafficking policy.

The influence of NGOs and IOs in Russia has been greatly reduced as a result of the closure of many NGOs from the Law on Foreign Agents adopted in July 2012 that requires organizations in Russia that receive funding from foreign sources and engage in political activity to register as foreign agents (Amnesty 2013). However this was not always the case, many of the NGOs in Russia working with human trafficking in the mid-2000s emerged out of women's rights organizations, gender centers, or domestic violence organizations (Interview Alexander, 2013). There were 100 NGOs working in the anti-trafficking field in 2006 at the first all-Russian Assembly of NGOs working in anti-trafficking (UNODC 2010, 153). At one time, the IOM network of rehabilitation NGOs was numbered at 18, but now more than half of them have closed because of the foreign agent law and government supervision resulting from this law (Interview, Katerina, 2013). Although influence on the national level is difficult, individual organizations in the regions have found it more effective to utilize local or regional contacts to influence their republic or municipal level go-

vernments through letter writing campaigns or personal relationships with local and regional authorities (Interview, Vera, 2013). Consequently, there are a number of IOs working with local NGOs to implement human trafficking policy in all three cases. The types of organizations vary by country, as international organizations were prevalent in Ukraine but less influential in Russia and had almost no influence in Latvia. This was because there were strong local NGOs working on this issue in Latvia and in Russia legal impediments muted the impact of international organizations so only local NGOs with limited national influence remained influential.

## Policy Implementation

NGOs and IOs in the post-Soviet region have facilitated implementation of trafficking policies and held the government accountable when this implementation has fallen short. In doing this, they have helped instill international norms and values related to human trafficking into society. NGOs have facilitated implementation in a number of ways by monitoring implementation of these laws and policies, building and shaping anti-trafficking institutions, and helping strengthen government capacity. The most similar case study comparisons demonstrate that there are a number of constraints on NGOs and IOs impeding their influence on policy implementation. These constraints are outlined in Table 1.

**Table 1: Organizational Constraints Impeding Policy Implementation**

| | Ukraine | Latvia | Russia |
|---|---|---|---|
| **Government Institutional Constraints** | Sporadic working groups and lack of infrastructure to implement policy. | Stable working group and government capacity to implement policy. | No working group and lack of political will to implement policy. |
| **NGO Capacity** | Rehabilitation center supported by international donors. | State supported NGO rehabilitation. | Law on Foreign agents has closed many NGOs and limited their capacity to provide victims' services. |
| **Legislative Frameworks** | Adequate legislation but implementation is erratic. Feedback on policy implementation from IOs based on data from NGOs. | Adequate legislation but law allows for only one NGO to provide rehabilitation services. Legislative critiques from NGOs not welcomed by government. | Lack of legislation impedes policy adoption, implementation, and evaluation. |
| **NGO Cooperation** | Nascent NGO coalition facilitated by IOs but made up of NGOs. | Lack of communication and competition for grants impedes cooperation. | Fluid NGO environment and competition for grants hinders cooperation. |

Note: This table shows the different constraints on NGOs in the three case study countries Ukraine, Latvia, and Russia with respect to policy implementation.

## Monitor Implementation

NGOs in the post-Soviet region monitor the implementation of national level human trafficking laws. Anna, a NGO representative, said, "We actively participate in monitoring state policy and the advocacy of appropriate changes to the national legislation. We can see how the law works in practice. For example, what provisions are working, what provisions are not working, what are the difficulties, what are the possible ways to overcome these difficulties" (Interview, Anna, 2013). La Strada in Ukraine even publishes monitoring reports and analyses of laws where they work with legal scholars to break down every aspect of the law and offer recommendations to improve it (La Strada 2013). The All-Ukrainian Counter-Trafficking NGO Coalition, with 75 member organizations around Ukraine, lobbies the government directly. Lidiya, director of a regional NGO that is a member of the coalition, said that "if all the European countries will choose human rights, including combating human trafficking and helping victims, then our coalition will help our government correct our policy to combat trafficking" (Interview, Lidiya, 2012). NGOs also use critiques from international monitoring missions such as the Group of Experts on Action against Trafficking in Human Beings report from the Council of Europe and Trafficking in Persons (TIP) Report from the United States Department of State in all three countries to guide their monitoring as some organizations do not have the resources to conduct their own examinations of policy implementation.

In Latvia, the stability of employees working in the anti-trafficking field and personal factors have helped monitor the implementation of Latvian anti-trafficking policy. For example, when the problem of sham marriages, where third country nationals recruit women on Latvian social networking sites and force them into marriage in order to get EU residency rights in countries such as Ireland (Jolkina 2011) was recognized, the issue was discussed at the working group. According to one respondent, "We have a small, compact, efficient system for combating human trafficking. People who work in this system are professionally trained, know each other, and collaborate quickly. Police, prosecutors, and legal professionals will not develop as fast as the crime, but we have to work at the maximum accelerated speed" (Interview, Aigars 2013). This example demonstrates the resiliency of the working group and the Latvian anti-trafficking system to changes in human trafficking. Thus, we can see both positive and negative feedback loops facilitated by NGOs that allow the government to recognize holes in the laws and policies and work to fill them.

In Russia, the monitoring of policies is much more difficult because it only has two criminal code articles related to human trafficking. Consequently, the NGOs critique the lack of human trafficking policies adopted by the government instead of evaluating the implementation of policies. They also criticize the lack of assistance given by the government to victims. Yelena, a regional NGO representative said the following: "Victims of trafficking need shelter, social protection, document assistance, health care, etc. This is not included in the criminal code article! No one

does anything about this. There is no political will to assist victims, no one hears us!"(Interview, 2013). The monitoring and critiques contain international norms and values on human trafficking that many local NGO leaders learned at international conferences, international visits, or from international organizations. Many respondents I spoke with mentioned visiting the United States on some type of US Embassy organized study tour or observational learning exchange focused on human trafficking models in the U.S. Respondents also discussed international conferences on human trafficking where they learned about new ways to combat trafficking or rehabilitate victims. These norms and values are then taken back to the region and utilized when NGOs critique policies. Thus, NGOs and IOs provide feedback when the policies work and when they do not work. They do this by forming feedback loops where NGOs report back to the government on certain aspects of the policy that are not working. Then these NGOs assist the government in working on new legislation to improve the existent laws.

## Building and Shaping Anti-Trafficking Institutions

NGOs have also been integral in forming anti-trafficking institutions such as working groups or task forces aimed at anti-trafficking issues and rehabilitation centers that work to rehabilitate victims. NGOs have pushed for these provisions in policy and then they work side by side with these institutions and sometimes even run them in order to implement the policies effectively. Working groups have proven to be an instrumental part of policy implementation and efforts have been much more successful in countries that actually have working groups (not just prescribe them in their policy) that meet on a regular basis and include both governmental and non-governmental representatives. In Latvia, where policy implementation was the most effective, they have a working group of government and NGO officials who meet regularly to work on solving human trafficking. When the working group was established in 2003, the TIP report stated that the Latvian government was not doing enough to fight trafficking and that the only entities doing anything to fight human trafficking were the NGOs (Interview, Evita, 2013). The working group was formed and has been operational ever since, even expanding its membership to include more ministries with NGOs as full members that can vote and provide input on decisions (GRETA 2013, 11).
In Ukraine, the first government sponsored working group, the Interagency Coordinating Council on Combating Trafficking in Human Beings was established with the support of IOs , NGOs, and stakeholders within the ministries in 1999 (Karpachova 2002, 220). Since the establishment of the first government sponsored council, the group has changed names and the lead agency in charge of the group four times. Respondents said that there had not been a meeting since 2011 and with the war in Eastern Ukraine the Ministry of Social Policy, the lead government agency working with trafficking victims, has been overwhelmed with internally displaced persons. Since there was so much confusion with the government sponsored working group,

the IOM supported a project that established the All-Ukrainian Counter-Trafficking NGO Coalition, consisting of organizations working on human trafficking (Interview, Yana, 2013). The establishment of this coalition marked a significant achievement for the development of human trafficking interest groups in Ukraine. Instead of operating in separation, lobbying their local officials in isolation, NGOs can now expand their influence to the national level and have nation-wide support of their efforts. The coalition signed a memorandum of understanding with the Ministry of Social Policy in 2013, which ensures that their voices will be heard with future policy development. The emergence of this coalition, and the perceived influence it will wield, further demonstrate the influence of these organizations in the implementation of policies.

Although currently there is no official working group tasked with coordinating human trafficking activities in Russia, there were a few previous attempts at official working groups that were developed in the early 2000s to work on the issue of human trafficking. Russian President Vladimir Putin founded a working group on human trafficking legislation development, headed by the Ministry of Interior in April 2002 (McCarthy 2011, 68) and an interagency working group was also established in the Duma in October 2002 (IOM 2003, 171) but after the criminal code was adopted in 2003, these working groups seemed to disperse. Some regions in Russia, such as Vladivostok and St. Petersburg, have also reported ad-hoc regional working groups to ensure the cooperation of government and civil society organizations when working with people in crisis situations; however, these groups are informal and meetings are sporadic (Interview, Vera, 2013). Similar to Ukraine, when the government failed to deliver a working group on human trafficking issues, the NGOs in Russia formed their own groups. The IOM in Moscow has facilitated the establishment of an interdepartmental working group for the improvement of a referral mechanism model that held its first meeting with the Russian Red Cross in December 2013 (IOM 2013b). The Russian Association of Crisis Centers for Women is an advocacy coalition of around 160 non-governmental and governmental entities around Russia and members of the network participate in the Gender Issues Council at the Ministry of Labor and Social Protection (Interview, Galina, 2013). NGO membership on the council means that they have direct access to government policymakers and possibly the ability to shape policy (Interview, Galina, 2013). Despite these NGO coalitions in Russia focusing on trafficking, a number of respondents discussed the lack of cooperation between NGOs in the country. Katerina, a regional NGO representative, said "It's a common problem here that NGOs are not working together or cooperating. There is a huge competition between NGOs. They just hate each other because it is all about the competition for funding. I tried hard to cooperate with other NGOs, but it's absolutely impossible to do" (Interview, Katerina, 2013). Thus, there seems to be limited cooperation among some NGOs in Russia despite the fact that others have worked together to form working groups on human trafficking in the absence of government efforts.

Another way that NGOs in this region have worked to build and shape human trafficking institutions is through centers that work to rehabilitate victims. Most reha-

bilitation centers and specialists trained to work with human trafficking victims are from NGOs. Regarding training, again it is evident that international norms and values related to human trafficking have been passed down including a sensitive victim-centered approach to rehabilitation and confidentiality laws. Many rehabilitation plans for human trafficking involve NGOs since they have specialists who are trained to work specifically with trafficking victims whereas government psychologists are trained to work with a much broader range of concerns (Interview, Anna, 2012). In Latvia for example, the government initially contracted out the rehabilitation services to one NGO that provided services to victims but the system has evolved and they now work in tandem with government social service centers. The NGO with the government contract works with five regional crisis shelters (Interview, Zanda, 2013) around Latvia to provide psychological, medical, and legal services (TIP 2013, 232), but there is no rehabilitation center or shelter supported by the government or international funding specifically devoted to human trafficking. Initially, this money for rehabilitation services was provided by European and international donors but the Latvian government has doubled funding and expanded victims' services over the past three years (TIP 2013, 232).

In Ukraine and Russia the situation with rehabilitation is quite different. In those countries, NGOs and IOs handle the rehabilitation because either the state does not have the capacity to work with the victims or because the NGOs have developed an expertise in this issue and so the victims are better suited receiving assistance from them. The rehabilitation center in Ukraine for trafficking victims provides free short-term medical care and psychological assistance to victims of trafficking for up to a month. After victims leave short-term assistance, 28 reintegration partners located throughout Ukraine facilitate reintegration assistance with services including medical, psychological, legal, and financial assistance, shelter, and vocational training (IOM 2013a).

In Russia, the IOM sponsored a 2003 project that established four shelters for trafficking victims in St. Petersburg, Murmansk, Petrozavodsk, Kazan, and one rehabilitation center in Moscow (IOM 2003, 170). This project lasted until 2009 when the government made no indication of its desire to take over or work with these shelters, so the project ended and shelters were closed (Interview, Katerina, 2013). Victims may also go to any of the 2,500 women's centers around Russia to receive assistance, but these centers treat general medical issues and social workers are not trained to identify women as trafficking victims or specialize in trafficking care (Interview, Elvira, 2013). Since the IOM's internationally sponsored shelters closed and the NGO law limiting foreign funding to the women's organizations forced many of these to close as well, the anti-trafficking movement has taken a decidedly more Russian approach. The women's organizations that brought the issue of trafficking to the forefront were supported by international funding, so many of them were seen as bringing Western ideals into the country as well. When that funding dried up, many of these organizations ceased to exist, leaving a vacuum where services for trafficking victims once

existed. In the wake, a number of new players have emerged such as the Russian Red Cross and the Russian Orthodox Church. In 2013, the St. Petersburg municipal government granted the Russian Red Cross an apartment space to open an eight-bed IOM supported trafficking shelter (IOM 2013b) with help from the Federal Migration Services (Interview, Katerina, 2013). Russian Orthodox monasteries around Russia have been housing victims temporarily until government service centers or NGOs could be located to assist them. Both of these organizations have long histories in Russia, cooperate with local authorities, and are seen as being friendlier to the regime than the foreign sponsored women organizations (Interview, Boris, 2013). Consequently, in Russia we can see a rejection of international norms and values conferred by women's NGOs and an acceptance of Russian centered NGOs who have worked together with government authorities to re-establish trafficking shelters.

### Strengthen Government Capacity

Through all of these activities, NGOs in the post-Soviet region have worked to build and strengthen government capacity. NGO efforts can be recognized in the adoption of laws, their monitoring of these laws, and the development of anti-trafficking institutions. They have also worked to pass on international anti-trafficking norms and values to the local community through trainings with government officials, social workers, and police. Nearly every NGO in all three countries that I interviewed described conducting some sort of training to educate officials on some aspect of rehabilitation, prosecution, or policy implementation. One NGO in Ukraine discussed the work that they do to assist the government employment centers where they trained civil servants to teach potential job seekers how to recognize potential employment scams (Interview, Lidiya, 2012). They have also taken the tools that they have learned from international organizations on investigative methods and techniques and adapted these norms to the regional level police by providing training to police on victim-centered approaches and how to recognize victims. NGOs have worked with government service center employees such as psychologists and social workers, to train them on victim identification and restorative methods for the rehabilitation of trafficking victims. The specialized knowledge that many of these NGOs possess on human trafficking rehabilitation was obtained from international organizations, international workshops, or exchange visits and these international values and norms are then passed on to the local community and government through trainings conducted by NGOs.

## Conclusion

This article revealed the integral role of NGOs and IOs in anti-trafficking policy-making in the post-Soviet region. NGOs and IOs were there to help transform international norms and values into national law. They were the go between and

the impetus for many policy changes in the three countries examined in this study Ukraine, Latvia, and Russia. Human trafficking policies are more likely to be adopted and effectively implemented when there are NGOs active in the country and anti-trafficking advocates within the government and bureaucracy. They critique existent policy and lobby for new ways to solve implementation problems. NGOs and IOs take human trafficking norms and values from the international system and use them to target individuals within the government and bureaucracy that share or are open to these values. These advocates lobby for effective policy, help facilitate implementation, and are invaluable to the anti-trafficking movement in these countries. This is especially evident in Russia where the absence of trafficking laws and recent closures of NGOs related to a law on foreign agents have left a vacuum and lack of any real policy implementation on the national level.

NGOs and IOs have helped guide policy implementation by monitoring implementation, building and shaping anti-trafficking institutions, and strengthening government capacity. They have also held the government accountable when this implementation has fallen short. NGOs and IOs have helped build and shape anti-trafficking institutions and when the government failed to initiate some of these institutions, such as a working group, NGOs started their own. They contribute specialized knowledge gained from policy learning visits to other countries with transnational feminist networks in a number of areas related to the rehabilitation of victims. Finally, they help strengthen government capacity through trainings of police, government officials, border guards, and social workers. All of these areas build government capacity in the area of anti-trafficking, help implement trafficking policies in the post-Soviet region, and instill international norms and values related to human trafficking into society.

Political institutions within the three countries constrain NGO activity. The Russian government's absence of political will to adopt more human trafficking policies constrains NGO action on implementation since they do not possess human trafficking laws aimed at assisting victims. In Ukraine, the government's institutional constraints concern the limited government oversight with implementation where NGOs have to step in and monitor implementation. This constraint helps the NGOs and IOs implement policy, build trafficking institutions that can help facilitate this implementation, and this in turn strengthens government capacity. Latvian governmental constraints are minimal on NGOs in that country as they have the capacity to implement laws and a stable anti-trafficking working group.

The capacity of NGOs in the three cases also impedes their ability to implement government policy. Since NGOs and even IOs are largely supported by international donors, their ability to influence the government and monitor implementation is lessened if they do not obtain these grants. Additionally, financial resources from the government put NGOs in an awkward position as they seek to attain these funds and monitor implementation because these organizations are criticizing the entity that provides them with financial support. This is the case in Latvia where the go-

vernment contracts rehabilitation services out to NGOs but some respondents argued that critical evaluations of the government's actions have hindered their ability to get these grants for victim support in the future. In Russia, the foreign agent law has limited the ability of many NGOs working with trafficking to operate in that country and many have closed. As a result, many are constrained and cannot monitor implementation as effectively as they would like. In Ukraine, the IOs receive most of the grants and local NGOs that partner with these organizations receive support from these IOs. While local NGOs are critical of the government, policy evaluation for the most part only occurs from the IOs on the national level. Although IOs get data from local organizations these local organizations are limited in capacity because they do not have the national reach and financial resources that IOs possess to conduct evaluations.

Legislative frameworks also hampered the influence of anti-trafficking organizations with policy implementation. Criminalization statutes in Russia limit the ability of NGOs because there are no laws that deal with the rehabilitation of victims. This means that policy implementation in that country only concerns the police because the only policies that can be implemented are those that convict traffickers. In Ukraine and Latvia implementation can be measured by the victim service provisions, however, the limited legislative framework in Russia constrains NGOs from monitoring implementation. In Ukraine, the legislative frameworks are abundant and the government tests new policy ideas with feedback from NGOs and IOs. In Latvia, NGOs facilitated policy implementation and offered feedback to the government so they were not constrained in their actions. However, the law prescribes that only one NGO can possess the government contract for rehabilitation which constrains the other NGO and limits cooperation.

NGOs and IOs are also constrained in their influence on policy implementation by other organizations in their country. While NGO and IO influence can be facilitated through NGO coalitions and networks there is also competition among these organizations for grants. In Ukraine, the NGO coalition is still young but using the strength of 75 organizations across the country they seek to facilitate policy formation and implementation. Latvia's two local NGOs compete for grants against each other due to the legal constraints which limits their ability to work together on policy evaluation and implementation. Russia's fluid NGO environment with so many organizations closing after the adoption of the law on foreign agents, limits cooperation because they are all competing for their livelihood and a small number of local grants. NGO cooperation can facilitate policy implementation by offering a network of organizations working together to evaluate and assist with implementation.

This article further determined that these anti-trafficking organizations have learned to work within the system of constraints presented by authoritarian regimes and lobby to influence policy development and implementation on the national and regional levels. NGOs and IOs try to implement policy while constraints related to government institutions, NGO capacity, legislative frameworks, and NGO cooperation inhibit

their activities. Despite these constraints, NGOs and IOs in Latvia and Ukraine are more effective at facilitating policy implementation than Russia. In conclusion, this article determined that effective implementation depends on the government's capacity and willingness to implement these policies. I also found that NGO cooperation helps facilitate implementation. These NGOs form a bridge between international anti-trafficking norms, the government, and citizens. Thus, these organizations have acted as norm entrepreneurs influencing policy implementation and introducing international anti-trafficking norms to countries in this region. My research supports the hybrid model of NGOs where they provide social services and work to adopt and implement human trafficking policy despite numerous constraints. It builds on this theoretical framework by assessing the challenges and opportunities of these organizations in the area of human trafficking as they monitor implementation, build and shape anti-trafficking institutions, and strengthen government capacity.

## Notes

1 Triangulation means that two methods were used to obtain the data or verify the results of the data. This increases the reliability of the findings since two different methods were used to obtain the results. The paper relies heavily on interview data from a variety of interview subjects and was compared to archival documents, legal documents and news articles to ensure validity.

2 The names of the interview respondents have been changed to protect their anonymity.

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