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# IN HER WORDS:

## EXPOSING OBSTACLES TO THE EFFECTIVE IMPLEMENTATION OF RIGHTS AND PROTECTION POLICIES FOR HUMAN TRAFFICKING SURVIVORS IN SPAIN

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# INTRODUCTION: The trafficking context and legal framework in Spain

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Although there have been undeniable advances in the anti-trafficking legislation in Spain, listening to the voices of human trafficking survivors exposes the alarming difficulties in the effective implementation of protection measures provided by the Spanish state. Three women whose names have been changed for their protection, will share their accounts. Although each women's story is unique, they have all had similar experiences with Spain's legal protection system in that: they all agreed to cooperate with the authorities by initiating conduct with the police (none of the women were discovered through 'raids' or detentions for their 'irregular' status), as well as by providing evidence, pressing charges, and testifying (with the exception of one woman who did not testify because her case was not taken to court). Yet, to some extent, these women were still excluded from protection mechanisms for victims of trafficking, including immigration relief in a timely manner, re-integration and safety. This led to the women feeling unsafe (both in Spain and in their countries of origin) and unable to access employment and reintegration opportunities in Spain.

Like those who will share their voice here, individuals all over Spain are forced, coerced or lured into illegal or legal immigration with promises of legitimate work or study opportunities. Spain is a destination country for migrants from Latin America, Eastern Europe, Asia and Sub-Saharan Africa where poverty, lack of economic opportunities, gender-based discrimination, and violence contribute to the willingness of migrants to accept offers to come to Europe. Instead of legitimate employment or schooling, the fate of these migrants is enslavement in the form of forced unpaid labour and other forms of exploitation, in areas such as agriculture and domestic service, as well as sex work, begging and crime. Because Spain is only in the initial stages of collecting reliable data, the extent of women, men and children affected in Spain is unknown.<sup>1</sup> According to the International Labour Organization a conservative estimate of the number of persons globally affected at any one time is 2.5 million.<sup>2</sup>

It may be important to define what constitutes a "victim" of human trafficking if only for the purpose of allowing survivors to claim their rights. The label "victim" must be used with great caution. These women have suffered a specific violation within a specific time and in one aspect of their lives. Their being and identity is much greater than their experience of human trafficking. Their stories will demonstrate their courage, strength and will. All of the survivors discussed in this paper meet the criteria for having once been victim to human trafficking as defined by the United Nations (UN)<sup>3</sup> and by the government of Spain, which has included the UN's definition in its legislation, and therefore they are entitled to a series of guaranteed rights.

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<sup>1</sup>The Centre for Investigation Against Organized Crime (CICO) has begun to collect unified and detailed data on human trafficking. <http://www.intelpage.info/centro-de-inteligencia-contra-el-crimen-organizado.html>

<sup>2</sup> International Labour Organization, A Global Alliance against Forced Labour (Geneva, International Labour Office, 2005).

<sup>3</sup> Article 3, paragraph (a) of the Protocol to Prevent, Suppress and Punish Trafficking in Persons defines Trafficking in Persons as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

The Spanish state has made many advances in their policies to protect human trafficking survivors and has supported many protection and reintegration programs. In December 2008 Spain passed its first National Plan to Combat Human Trafficking for the Purpose of Sexual Exploitation, although it does not include other forms of exploitation. Further, In 2010 Spain amended its Criminal Code to legally distinguish between trafficking and illegal immigration.<sup>4</sup> Because Spain has yet to pass a comprehensive law to combat human trafficking, protection for human trafficking victims is included in its Law for Foreigners. In December 2009 Spain amended Article 59 of the Law for Foreigners<sup>5</sup>, incorporating an important set of protective measures for victims. In April 2011 the regulation<sup>6</sup> implementing this amendment was issued. The protection measures in Article 59bis include:

- Mechanisms for the process of identifying human trafficking victims
- Recovery and reflection period<sup>7</sup> (30-day minimum)
- Residency/work permit for exceptional circumstances:
  - In exchange for cooperation with authorities and pressing charges against trafficker/s or
  - On account of the victim's needs or personal situation.<sup>8</sup>

Almost 2 years after this amendment passed, there are still major roadblocks in terms of the effective implementation of these rights. This paper will shed light on the difficulties that survivors are still facing in realising their rights, and the existing gap between policy and what is happening on the ground.

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<sup>4</sup> Spain recognizes all types of exploitation in the amended Criminal Code.

<sup>5</sup> Organic Law 4/2000 Jan. 11 Rights and Liberties for Foreigners in Spain and Their Social Integration [http://extranjeros.mtin.es/es/NormativaJurisprudencia/Ley\\_Organica\\_4\\_2000.pdf](http://extranjeros.mtin.es/es/NormativaJurisprudencia/Ley_Organica_4_2000.pdf) Article 59bis, P.98

<sup>6</sup> New Immigration Regulation RD 557/2011, April 20 which regulates Organic Law 4/2000,, following its reform for Organic Law 2/2009.

<sup>7</sup> This is a time period for illegally present victims during which they are not to be removed from Spanish territory. The purpose is to recover and reflect on the decision to cooperate with Spanish authorities and press charges.

<sup>8</sup> According to article 184 of the Explanatory Report of The Council of Europe's Convention on Action Against Trafficking, the personal situation provision takes into account the victim's safety, state of health, family situation or other factors.

# HOPE'S STORY: Cooperated with authorities but excluded from protection

Hope, a 22 year-old mother from Nigeria bravely exhibits her story.

Hope tells us that when the poor in Africa are offered an opportunity to go to Europe, they are willing to take great risks because they face desperate situations. In Hope's case, she left Nigeria because she felt she had few financial options to support her son and the rest of her family members who had become increasingly dependent on her. She recalls her departure:

*I learned a lot because [I travelled] all the way from Nigeria to Spain... I walked by foot; I walked in the forest without shoes. I spent three days in the desert without food or water. I travelled for two months. So for that I'm not scared of anything. We were a lot [of people]. A lot died. I was among the living.*

Through her journey from Nigeria to Northern Africa, Hope ventured through Niger, Algeria and Morocco by foot, motorcycle, car and bus in conditions of extreme physical stress as well as sexual and emotional abuse. Hope eventually succeeded in crossing the border reaching Ceuta, the Spanish enclave in Northern Africa surrounded by Morocco. Her journey did not end there. Hope was informed that she had to pay off a 40,000 Euro debt with sex work in order to cover the expense of her travel. For the people who brought her to Spain, the purpose of Hope's trip was exploitation through debt bondage. Debt bondage is a type of enslavement included in the UN's definition for human trafficking, which describes a condition of slavery arising from a pledge to pay off a debt with personal services that are not clearly limited and defined, or do not liquidate the debt.<sup>9</sup>

After suffering from exploitation, harassment, and abuse for over 7 months as well as having witnessed many women in her situation working as prostitutes for years without pay, Hope eventually took the risk to file a report against her traffickers. The next day Hope's story was published on the front page of a local newspaper, putting her and her family in great danger. Shortly after, her family in Nigeria received death threats and their house was burnt down. Hope explains:

*It was a lot of risk [reporting her traffickers] because they arrested one of the traffickers, and before he went to prison...he came at night and tried to drag me out of the room...the boy was trying to kill me...that's why they took me out of the camp [in Ceuta] ... and they sent him back to Nigeria.*

<sup>9</sup> Debt bondage is defined in Article 1a of the Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery: <http://www2.ohchr.org/english/law/slavetrade.htm>

Spanish authorities gave Hope permission and the means to travel to the Spanish Peninsula in order to protect her from her traffickers, thus validating her story. Hope pressed charges against her traffickers, provided provable evidence, and assured the police of her continued cooperation. However, the police closed the criminal investigation against Hope's traffickers and therefore did not need her assistance. Further, the authorities did not consider her cooperation sufficient enough to grant her a permit designated for trafficking victims who cooperate with the authorities. Hope declares:

*They trusted me because I proved it to them...I identified his photo, they took him to jail and then sent him back to Nigeria....I was willing to work with them [the authorities]...I don't know why I didn't get that document [permit for cooperation].*

Because returning to Nigeria was no longer a safe option for Hope, she applied for asylum.<sup>10</sup> Hope's application was accepted for review and she was given an asylum-seeker card, which included temporary residency and work permission until authorities resolved her asylum case. Hope shares:

*I didn't like that paper [asylum-seeker card]...looking for jobs... [employers would say] "What is that?"...I felt neglected...They [the employers] didn't know what it was. I only worked three months. I can't be in a country for 3 years without working.*

Despite the difficulties Hope encountered, she did initiate her integration process, received professional training and held temporary part-time employment as a translator. However, after three difficult years of working towards integration, the Spanish government denied her asylum.<sup>11</sup> Hope expresses her frustration about the denial of asylum and lack of protection from the Spanish state:

*...I have renewed that paper [asylum-seeker card] for almost three years and then they took it from me. I don't feel any protection...They arrested the man [one of the traffickers]...I feel like I can't go back to Nigeria. When I go back...the man will be looking for me... they sent him back to Nigeria because of me. I feel so disappointed... The woman [one of the traffickers] may see me...she's in Madrid...and I am still receiving threats.*

Hope feels that her new status as an 'irregular' immigrant has taken her back many steps in her integration process:

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<sup>10</sup> Article 1 of the Geneva Convention as amended by the 1967 Protocol provides the definition of a refugee: "A person who owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it.."

<sup>11</sup> According to the Spanish Commission for Refugee Assistance (CEAR)'s 2011 Report on Asylum in Spain, only 260 individuals, 8.1% of the cases admitted for review, were given asylum in 2010. The motives stated for Hope's denial were: Motives to question the truth of her account, the alleged persecution offences do not meet the criteria for asylum, and lack of information to support the fact that the Nigerian State could not protect her.

*When I had the red paper [asylum-seeker card] it was difficult for me to find a job, now I don't have anything, how will I find a job? I'm staying with my girlfriend. She gives me food. How am I going to look for job without a document? I learned Spanish, I learned to do hair, how to cook, how to clean but I can't find a job ...*

### **REFLECTIONS: Protection determined by victim's usefulness**

Hope's account demonstrates the gap in the Spanish law and the real experiences of survivors. The police closed the investigation on Hope's traffickers and for that reason had no use for her further cooperation. Although this fact does not make Hope any less of a victim of this crime, the consequences were grave as she lost her right to a residence/work permit for cooperation. Currently there are no legal criteria to regulate what constitutes as "cooperation with authorities." In Hope's case authorities used a very strict criteria to evaluate the granting of a permit for cooperation and her experience underscores the negative impact this has on survivors.

Further, her asylum request was admitted for review but after the Spanish government invested three years in Hope's integration, they denied her asylum, leaving her without residence and work permission. In addition, her personal circumstances were never taken into account for the possibility of providing her with alternative immigration relief, such as a permit based on humanitarian reasons. The Spanish government was unable to provide protection from her traffickers, who continue to threaten her and her family. Hope remains in Spain as an undocumented immigrant afraid of the Spanish police but also afraid of persecution in her home country.

Although the new legal framework obligates authorities to protect human trafficking survivors despite their ability or willingness to assist law enforcement authorities, in practice there are still obstacles for survivors to claim their rights unconditionally.

Although one can hear in Hope's voice legitimate frustration with the lack of protection provided by the Spanish state, she has been recuperating and taking her life back. She believes that for one to succeed in life one must learn to overcome unexpected obstacles, even tragedies declaring, *"I am much stronger now."* She is confident about her future saying, *"I have to continue my studies, live a normal life and make my own family."*

# MARIA'S STORY: "They make you relive it each day"

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Maria, a strong 22 year-old middle class student from Cameroon shares her voice.

Maria had been excelling in her nursing studies at a university in her hometown in Cameroon, when she met Carine, (name changed for security reasons) a woman from her village who presented her with a seemingly genuine offer to complete her university degree in Europe. Maria's father spent his entire savings, 10,000 Euros, to pay Carine for housing and enrolment in school for his daughter in Spain, where she would have the opportunity to work upon the completion of her degree.

Carine obtained a false passport for Maria and they travelled together to Europe, with Maria passing as Carine's daughter. When Maria arrived to Spain, instead of being sent to school, she was sent to the street to prostitute. Although she was thinking, "...if I escape Carine can kill me if she wants to..." Maria escaped and spent a few weeks living in the street before she built up the courage to go the police.

Maria says that originally she only wanted the police to help her go back home to Cameroon. She declares:

*...when I told the police what had happened to me, they said to me: 'Look, you can stay here in Spain, we are going to help you but you have to also help us find this woman [her trafficker] because many people suffer from this same situation. If you help us find this woman you can stay here.'*

Maria continues:

*...quickly after[ward], they detained Carine [the trafficker] and my lawyer applied for my residency, but it took so long. The police kept calling my lawyer asking if I had more information, something that proves that Carine sent me to the street. I didn't understand. I felt bad, very bad. I told everything that had happened to me and they know very well that I was telling the truth. They even arrested Carine. I don't think the police believed me.*

Even though Maria responded to all requests from the authorities, a year passed and she still did not have any documentation. She shares, "*I couldn't work or anything. And without documentation they can send me back there [to Cameroon].*" Maria has repeatedly been made to explain her situation to police conducting controls to combat illegal immigration. She explains:

*The police in the street ask for your documentation, every time they ask you, you have to tell your story again, say that I am a protected witness, and they ask you, 'Why? What happened to you?' Or sometimes they look at my paper and they ask me, 'Why are they giving your residency for cooperation with the police?' and I would have to tell my entire story again, look I am a trafficking girl, I was lured...I leave the police feeling horrible. What you want is to forget but they make you relive it each day.*

When asked what she has risked by pressing charges and testifying against Carine, she responds, “*My life.*” Maria explains that since the day she was told that she would have to prostitute or face death, she has not felt safe anywhere, neither in Spain nor if she were to return to Africa. Maria fears Carine or her family will retaliate because Maria provided information to the police that led to her arrest. Maria expresses, “*...what most hurts me now is that she [Carine] is free in Spain and she can come after me anytime...how can you live peacefully in the same place with your pimp, who has problems with you because you got her arrested? She can kill me if she wants.*”

### **REFLECTIONS: Re-victimised by the authorities**

Maria’s account exposes many of the difficulties in the effective implementation of protection measures for human trafficking survivors. The need for a more human rights approach is apparent from Maria’s encounters with authorities. When Maria first told the police her story, they declared her a protected witness and informed her that her right to a residence permit would be granted if she were to press charges against her traffickers. She pressed charges and while she waited for her application to be reviewed during a prolonged period of time, she was left with “illegal” immigration status and uncertainty.

The lack of documentation was not only a barrier for Maria’s social and labour integration into Spain, as she could not work, but it was also a cause for re-victimization. She lived with the constant fear of being deported to her home country where she feared death. To avoid detention and deportation, she had to retell and relive her experience: stigmatized and treated once again as a victim. In addition, she was re-victimized as the authorities continually questioned the validity of her experience.

She was finally issued a permit a year and two months after the day the police encouraged Maria to stay in Spain. Even with a Spanish residence permit, Maria still does not feel protected from the persecution of her trafficker.

Celebrating her twenty-second birthday, Maria reflected on the difficulties and successes she has had this year. She has taken important steps forward reconstructing life experiences, obtaining a work permit and creating a social network. In an interview she explained that she sees opportunity in her future, “*...with hope, with happiness not because I know what is going to happen to me tomorrow. I have a life very different than everybody else, because when you have a problem like this with somebody, you can die in any moment...*” Ending her birthday celebration, she toasted to hopes of finding work and creating her own family in Spain.

## BLESSING'S STORY: Assisting authorities but still not feeling safe

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Blessing, a brave 21 year-old woman from Nigeria shares her account of human trafficking.

Blessing was receiving professional training and interning at a school in her hometown, when Lera (name changed for security), a woman from her neighbourhood offered her the opportunity to travel to Europe. The woman explained to Blessing that she had contacts in education and that Blessing could work as a nanny, study education and eventually open her own day-care centre in Spain. Blessing accepted the offer because, *"...I wanted to achieve my dreams! I love taking care of little kids....this is how she tricked me."*

After a long journey from Nigeria, through Niger, Algeria and Morocco, Blessing still remembers being smuggled in a hidden compartment of a vehicle across the border to the Spanish territory of Ceuta. Upon arrival in this foreign place Lera [her trafficker] told Blessing that she had to work in prostitution to pay back 35,000 Euros for her journey. She underwent a voodoo ritual which Blessing describes, *"...she took my picture, my hair, finger nails, skin, and a stain of my menstruation blood. In case I didn't pay the money."* This voodoo ritual is commonly used to threaten and control Nigerian trafficking victims. It is a type of psychological captivity in which it is unnecessary for traffickers to keep victims under lock and key because they sufficiently fear the consequences of breaking a voodoo vow, which may range from going mad to infertility, or even death.

Blessing tells about severe abuse she suffered from her trafficker, *"...when she found out I was pregnant, she gave me some drugs and put a pen inside of me, until I started to bleed...I lost my baby and I am afraid that I can't get pregnant again."* After two and a half years of exploitation, Blessing built up the courage to ask the police for help. She expresses, *"...I didn't tell everything, just the important things because I was still afraid that they were going to deport me or arrest me. I was shaking."*

One can hear the apprehension in Blessing's voice, underscoring the limitations she faced because her fear understandably prohibited her from fully disclosing her story. Despite these fears, Blessing pressed charges against Lera in the spring of 2010. She later testified in court and provided key evidence which helped lead to Lera's arrest. Although Blessing had the law and the police that she assisted on her side, bureaucratic obstacles made it difficult for Blessing to exercise her right to residence permission. Like many Africans, Blessing did not possess any document accrediting her identification. *"They told me I need an original passport [to obtain Spanish residency]..."* Blessing explains, *"...but most people in Africa don't have documentation. I told him [the police officer] in my country, only the rich have passports."* In these cases, the Spanish protection system demands that individuals obtain identifying documentation from their embassies before immigration relief can be considered. However, many times embassies of the countries of origin do not facilitate these procedures. As it took over a year to obtain her passport, Blessing was trapped in this bureaucracy, which extensively prolonged her immigration relief process. Blessing expresses, *"When you don't have a passport...its like you are lost, like you are a refugee."*

Although, Blessing finally obtained her passport and officially presented her residence application four months ago, she is still waiting for her residency to be processed and thus cannot work, access most professional training programs nor walk freely around the streets of her town:

*It is not my country... I'm afraid. If the police see me they will ask for my document. I don't know what will happen to me. They [the police] told me not to move around the city because, I don't have [Spanish] documentation...I'm still afraid...I can't work... its difficult to leave my home ...Now I live with my boyfriend... I don't have any friends... Sometimes I do go to the Nigerian church and they would like to get to know me more but I'm a little bit scared of them...They want to know who I am, how I got here. Maybe they can get information to harm me.... one of them knows Lera [the trafficker].*

Blessing does not want to be stigmatized or judged for her experience and thus keeps to herself. She does not feel that she can live a normal and safe life in Spain, but she cannot go back home to Nigeria. She says, *"I'm afraid of the [trafficker's] family...so I avoid going to my county for now... She can send people to kill me..."* Lera was let out of prison and because she suspected that Blessing was the one to blame for her arrest, she immediately contacted both Blessing in Spain and her family in Nigeria, threatening to kill them.

### ***REFLECTIONS: Still waiting for her rights***

Once again a survivor of human trafficking, is still waiting for her rights to be realised. Blessing suffered a severe human rights violation took the risk of pressing charges, testified and provided useful evidence, which helped lead to an arrest. However because of the factors mentioned above, she is still without protection one year and a half after reporting her case to the police. Without a residency and work permit, she has very limited options for her integration into Spanish society, where she cannot reside or work legally. As she waits her documentation she will depend economically on her boyfriend and spend most of her time in her home.

Blessing is still suffering from the psychological effects caused by her experience. She shares, *"The saddest part of my life now is my head... I'm not comfortable with my being, because I feel that I am not okay. I feel weaker."* She explains that she would like to see a psychologist but prefers not to leave her house. Despite these difficulties both material and emotional, Blessing declares, *"I think my future is bright."* She explains that she is still working towards her dream to take care of children. She also wants to have children of her own and make a family. Ending the interview she assures, *"I'm strong, I'm okay, I'm an independent woman."*

# CONCLUSION: A call for a more diligent shift to a human rights approach with more effective access to immigration relief and other rights

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Some of the women expressed why it was important and empowering to share their stories. Maria tells us that, *“...it feels good to share my story because maybe it can help other women. If the government and others hear my story, maybe things will change, even a little would help.”* She explains that talking about her experience has helped her to release some of her frustration and fear. Blessing says, *“...if I didn’t report [the trafficker], they would do it again and again. Somebody must put a stop to it.”* She explains that telling what happened is the only way to find a solution. People must know this problem exists.

In addition, Hope reminds us that, *“there are a lot of women...that work on the street and pay a lot of money...”* Maria adds, *“A lot of people are suffering through that process [human trafficking] right now...”* Hope and Maria refer to the women who have not been able to share their voices here, because they are currently being exploited by their traffickers. They are women who may have interacted with immigration and law-enforcement authorities when they crossed the Spanish border with false identification, or were detained in the street because a police officer discovered they lacked residence permission. However, no authority has either stopped to ask the necessary questions or detected possible warning signs of trafficking. Instead the authorities treated them as illegal immigrants, lawbreakers. Authorities too often lack a human rights approach, greater awareness and resources, all of which would help identify victims. The Spanish state has failed to protect these unidentified women by not effectively implementing identification mechanisms guaranteed by law. The women who shared their voice with us can call themselves survivors. There are too many more who are still fighting to reach this step.

This paper gives three survivors a voice to express what is important to them and to evaluate the effectiveness of governmental protection measures. Through their stories, they have showed us that Spanish authorities have, in many cases, failed to effectively implement the Spanish anti-trafficking legislation. This has re-victimized women and created barriers for survivors wanting to realise their rights and integrate into Spanish society. Through their case studies, we witness the material consequences this lack of implementation has on the real lives of human trafficking survivors.

Although each individual has a different experience, the difficulties in accessing legal protection measures are repeated in Spain. In 2010 under Article 59bis, there was only a single residency/work permit granted, and no reflection periods issued to survivors represented by specialized anti-trafficking organization, Proyecto ESPERANZA. The organization provides comprehensive support to human trafficking survivors in Spain and assisted all of the women interviewed for this paper.<sup>12</sup> As of November, merely four permits and nine reflection periods were granted to clients of

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<sup>12</sup> For more information on Proyecto ESPERANZA please visit [www.proyectoesperanza.org](http://www.proyectoesperanza.org)

Proyecto ESPERANZA in 2011. In addition, the organization is not aware of a single trafficking victim who was granted asylum in 2010 and is concerned with the systematic denial of asylum for victims of trafficking. Because the government fails to publicise detailed data on the issuance of the above-mentioned protection measures, Proyecto ESPERANZA has no information to suggest that its data is not representative of the overall situation in Spain.

It is clear that there are still many difficulties in the effective implementation of the anti-trafficking framework, specifically of article 59bis of Spain's Law for Foreigner's approved in December 2009. The first barrier was a lack of an official regulation to provide guidelines for the implementation of protection measures included in the law. This regulation was finally passed in April of 2011. Although it minimally improved the application of the law, it still lacks important details on how to implement new protection measures. Just recently, on October 28, 2011 Spain passed the Framework Protocol for the Protection of Human Trafficking Victims, which aims to provide more specific guidelines to implement these protection measures including, detection and identification procedures, issuance of immigration relief, and coordination mechanisms. However, Proyecto ESPERANZA declares that although the protocol defines many procedures that will favour greater efficiency for applying Article 59bis, it still lacks key definitions and criteria to bring about significant improvement for the effective implementation of protection measures. Among other deficiencies, it fails to define "cooperation with authorities" and "personal situation of the victim."

The transition to the new legal framework protecting human trafficking victims has been characterized by the slow development of legal regulation and protocol, which still lack important details for effective implementation of the law. To speed up this transition, the protection system needs not only effective legal tools, but also requires increased awareness and training for authorities so they are capable of effectively protecting victims' rights in the new anti-trafficking framework.

It is clear that change in legislation is not sufficient if it is not combined with change in perspectives. The protection system has started to shift away from a focus on combating illegal immigration that had been prevailing, towards a more human rights approach. However, this shift is evolving far too slow, especially taking into account the impact it is having on victims and survivors of human trafficking.