



Mapping the Realities of Trafficking in Women for the purpose of sexual exploitation in Cyprus

FINAL REPORT

October 2007

Contents	Page
1. Introducing the Report	3
1.1 Defining Trafficking in Human Beings	5
1.2 Trafficking In Women For The Purpose Of Sexual Exploitation	6
2. The Case of Cyprus	7
2.1 Trafficking in Women for the purpose of sexual exploitation in Cyprus	7
2.1.2 The Unreasonable 'Artiste' Visas	8
2.2 Legally Speaking	13
2.3 The Cyprus National Action Plan to Combat Human Trafficking	17
3 Prevention	18
3.1 Root Causes of Trafficking - Of Demand and Other Evils	19
3.2 The need for statistics and research	22
3.3 Lacking Awareness	24
3.4 Media Power and Trafficking	28
4. Protection	29
4.1 Sheltering the 'Victims'	30
4.2 Identifying the 'Victims'	31
5. Prosecution	34
6. Conclusions and Recommendations	37
Bibliography	41
ANNEX A	
Conventions ratified by the Republic of Cyprus Government	45
ANNEX B	
Group of Experts who drafted the National Action Plan	46
ANNEX C	
Governmental departments and NGOs participated in the research	47
ANNEX D	
Information leaflet published by the Ministry of Interior	52
ANNEX E	58
'Artiste' Contract	

Key words: ‘artiste visas’; Cyprus; demand; gender; sexual exploitation; trafficking; women.

1. Introducing the Report

This report is the result of a research project conducted by the Mediterranean Institute of Gender Studies [MIGS]¹. The main aim of the project was to gain and share awareness, knowledge and understanding on the phenomenon of **trafficking in women in Cyprus**² for the purpose of **sexual exploitation**. The research was carried out using a **gender-sensitive, feminist perspective** and attempted to

a. map and assess existing data on the extent of trafficking in women for sexual exploitation in Cyprus

b. outline state and non-governmental responses to the problem and

c. suggest ways to combat this increasingly widespread phenomenon.

The research began in January 2006 and the data for this report was gathered predominantly through semi-structured interviews with key policy makers, government officials and NGO representatives /civil society activists working broadly in the area of trafficking, migration, and gender. The themes addressed in the interviews included the goals of particular existing and planned policies; awareness of issues and challenges relating to these policies and their implementation; views and attitudes regarding the situation of trafficked women in Cyprus; and, suggestions for the improvement of existing policies as well as best practices. Information was also gathered through the existing and planned National Action Plan for trafficking, media monitoring, and secondary

¹ Although there is strong evidence that trafficking in women for the purpose of sexual exploitation exists in the north part of Cyprus, it must be noted here that all the information collected in this report concerns the areas controlled by the government of the Republic of Cyprus.

²Cyprus is a small Mediterranean island located 800 kilometres from continental Greece 75 kilometres south of Turkey and 370 kilometres north of Egypt. The population of Republic of Cyprus is 766,400. Cyprus was a British colony until it gained its independence in 1960. In 1974 Cyprus was invaded by Turkey and as a result 37% of the island is under military occupation. The two main indigenous communities, Greek Cypriots [G/C] and Turkish Cypriots [T/C] live separately north and south of ‘green line’. The south part of the island is internationally recognised as the Republic of Cyprus. In May 2004, the Republic of Cyprus successful joined the European Union. Cyprus’ geographical location at the crossroads between east and west, as well as its recent accession to the European Union, put it in a prime position for the transit of trafficked women.

analysis of available statistical data as well as systematic observation conducted by MIGS throughout the research period.

This is the first time that research on trafficking in women for sexual exploitation in Cyprus is being conducted by a non-governmental organization. The Mediterranean Institute of Gender Studies [MIGS / see more information at www.medinstgenderstudies.org] promotes and contributes to projects of social, political, and economic themes relating to gender with an emphasis on the Mediterranean region. The Institute recognizes the multilayered levels of discrimination against women and accepts that this discrimination takes different forms. It is committed to the elimination of this discrimination using a combination of research, advocacy and lobbying, as well as trainings, conferences, and other activities.

MIGS has been working on the issue of trafficking in women for the purpose of sexual exploitation since 2002 through its various activities including conferences, seminars, awareness raising activities, publications, as well as the compilation of trafficking bibliography and website guide both of which have been made widely accessible to various stakeholders.³ The Institute is also an active member of the European Network Against Trafficking in Women for Sexual Exploitation, a newly founded network of organizations committed to the prevention of trafficking in women for sexual exploitation and to providing support and assistance to victims.⁴

MIGS is especially concerned that trafficking in women for the purpose of sexual exploitation in Cyprus takes unique and widespread dimensions and is a pertinent issue.⁵ “Cyprus has been transformed into a Sveltana island” the Sunday magazine of a large Greek paper claimed: trafficked women are part of Cyprus life and both the

³ <http://www.medinstgenderstudies.org/wp/?p=16>

⁴ <http://www.medinstgenderstudies.org/wp/?p=97>

⁵ Going as far back as to June 3, 2003 the World Tribune published an article titled ‘Cyprus called hub of Mideast prostitution’. It stated that “Cypriot officials said thousands of women are brought to the Republic of Cyprus every year, where they are sold into prostitution to Gulf Cooperation Council states. The officials said the United Arab Emirates is a leading destination of the traffic. ‘We are known, in female trafficking circles, either as a final destination point or a go-between on the way to the Middle East, usually the United Arab Emirates,’ Greek Cypriot parliamentarian Eleni Theocharous told the Nicosia-based Cyprus Mail newspaper. ... The House Human Rights Committee has condemned the use of the island for the international market in prostitutes. Parliamentarians said most women brought to Cyprus arrive as illegal residents and are blackmailed by their agents who force them into prostitution”

authorities and the people at large seem not to acknowledge the gravity of the problem but rather see these women as a threat to local family structures.⁶

One of the most important findings of this research project indeed is that, the large extent of trafficking in women in Cyprus is directly related to the **issuing of ‘artistes’ or ‘entertainment’ visas**. Despite numerous pleas and criticisms against it, the Government of Cyprus has failed to address the matter of ‘entertainment’ visas in a concrete manner. Further, it appears that the sexual exploitation of trafficked women is supported by **local rather than tourist demand** for sexual services.

1.1 Defining Trafficking in Human Beings

Defining trafficking has become subject to heated socio-legal debate. Because the experiences of trafficked women can take different forms, it is important that the definition of trafficking be strictly distinct from any other form of exploitation and particularly from the definition of smuggling as the two are often used interchangeably. The main differences between trafficking and smuggling are that “while smuggling is an intermediary function which facilitates the illegal crossing of borders, usually with the consent of those smuggled, trafficking is characterised by coercion and the subsequent exploitation of those trafficked”.⁷

According to the Council of the Europe Convention on Action against Trafficking in Human Beings article 4 (a),

“Trafficking in Human Beings shall mean the recruitment, transportation, transfer, harboring 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 labor or services, slavery or practices similar to slavery, servitude or the removal of organs.”⁸

⁶ For a detailed discussion, see Vassiliadou, Myria ‘Women’s Constructions of Women; On Entering the Front Door’, Journal of International Women’s Studies, Special Issue: Feminist Challenges: Crossing Boundaries, Vol. 5, #3, May 2004 Also available at : <http://www.bridgew.edu/SoAS/jiws/May04/index.htm>

⁷ EUROPOL 2005 Trafficking in Human Beings and Illegal Immigrant Smuggling www.europol.eu.int/publications/other/Reports%202005/Legislation%20on%20THB%20and%20IIS%20Public.pdf

⁸ Council of Europe Convention on Action against Trafficking in Human Beings and its Explanatory Report, 2005, http://www.coe.int/t/dg2/trafficking/campaign/Source/PDF_Conv_197_Trafficking_E.pdf

Article 4 (b) Council of Europe Convention on Action against Trafficking in Human Beings states that the consent of a victim of trafficking in human beings to the exploitation, intended or actual, shall be irrelevant where any of the means set forth in paragraph (a) have been used.

1.2 Trafficking In Women For The Purpose of Sexual Exploitation

Trafficking in human beings is a form of extreme exploitation that can include forced prostitution or other forms of sexual exploitation, forced labour / services, slavery or practices similar to slavery, forced servitude, or the removal of organs. MIGS is aware that various forms of trafficking in human beings take place; this report will focus on **trafficking in women for the purpose of sexual exploitation in Cyprus.**

Trafficking in women for the purpose of sexual exploitation is a fast growing phenomenon around the world. According to the International Organization for Migration [IOM] approximately 120000 women and children are trafficked into Western Europe each year. At the same time, an estimated 900000 people are trafficked annually worldwide of which 80 percent are women and girls. Several factors make women more vulnerable than men to being trafficked. MIGS considers the persistent gender discrimination and dominant forms of patriarchy in both countries of origin and destination to be the most important ones. Relating to this, other factors include the feminization of poverty [it is estimated that 2/3 of the world population living in poverty are women], gender inequality and lack of access to the labour market, lack of education and professional opportunities in the country of origin [according to UNESCO more than 56 percent of the 104 million out of school children are girls], and demand for sexual services in the destination countries.

Women increasingly migrate independently of their families in search of employment opportunities and a better future. They are also increasingly vulnerable to deception by traffickers with promises of employment opportunities, or are forced into prostitution through the use of violence, threats and deception, and consequently end up living under slave-like conditions as their fundamental rights and freedoms are violated. Trafficked women are usually isolated and under strict surveillance; traffickers and/or “employers” often withhold their personal documents and wages to repay “debts” [a

situation known as “debt bondage”], and often suffer from sleep deprivation and malnutrition. Women have been known to risk their lives attempting to escape. According to a report by the Cyprus Commissioner for Administration a Russian woman, having legally entered Cyprus on 5 March 2001 to work in a cabaret, died after falling from the 4th floor of an apartment building on 21 March 2001⁹ in her own effort to escape.

2. The Case of Cyprus

2.1 Trafficking in Women for the purpose of sexual exploitation in Cyprus

“The dream of 45% of women is to become prostitutes”.¹⁰

This statement was made by the former Minister of Justice, Doros Theodorou in reference to a survey on trafficking conducted in Eastern European countries to back his claim that many women brought to Cyprus as ‘artistes’ *voluntarily* engaged in prostitution, and that “the Commissioner for Administration [Ombudsman’s office] conclusion that the majority of women were blackmailed and forced to provide sexual services simply didn’t stand”.¹¹ In her report, the Commissioner for Administration had stated that Cyprus has been associated with trafficking many times in the past **both as a country of destination and transit for victims of trafficking**, particularly from Eastern and Central Europe for the purpose of sexual exploitation.¹²

Like elsewhere in Europe and worldwide, trafficked women in Cyprus are victimised in the process of migration for multiple reasons associated with gender. In Cyprus, these women are forced into prostitution by traffickers who fraudulently recruit victims for work as ‘entertainment’ dancers in cabarets and nightclubs on short-term ‘artiste’ or ‘entertainment’ visas. The majority of these women are in their 20’s, but some may be even younger. Many of these women arrive in Cyprus hoping for better economic prospects; some are mothers who arrive in Cyprus to earn money for their children’s

⁹ Cyprus Commissioner for Administration, 2003, “The Entry and Labor Status of Migrant Artists”

¹⁰ Stefanos Evripidou, ‘Theodorou Refuses to Back Down over Eastern European Prostitution Claim’, Cyprus Mail (Nicosia), 5 December 2003, p 3

¹¹ Ibid

¹² Cyprus Commissioner for Administration, 2003, “The Entry and Labour Status of Migrant Artists” Women”, Commissioner for Administration, Cyprus

futures, or aiming to eventually migrate with their families; others may work to pay for their studies, or to earn money to send to their families. Most arrive in Cyprus through employment agencies through the so called 'artiste' or 'entertainment' visas.

According to the Cyprus Civil Registry and Migration Department an entertainment visa is granted under the following conditions:

"The applications for these cases are submitted through artistic agents, according to the process followed, who are also responsible for the normal residence of the alien artists in Cyprus. Moreover, this Department grants for individuals, companies, hotels etc Entry/Temporary Residence and Work Permits to artistes, who will work in hotel units, in theatres, circuses and for other cultural events, for a few days only. Applications are submitted to the Civil Registry and Migration Department through the District Aliens and Immigration Branches of the Police".

2.1.2 The Unreasonable 'Artiste' Visas

"They talk about high-class cabarets. What high-class? They all bring women with one and only aim, to sell them... I estimate that with two 'visits' a day, each artiste clears around 100 pounds for her employer. We are talking about 2,000 artistes, thus 200,000 pounds per day"¹³

The government report to the CEDAW Committee in May 2006 states that 'the number of visas issued for the purpose of working in places, which are considered to be of high risk, is limited'.¹⁴ Five years after the above quote by the Minister of Justice and Public Order, however, about 2,000 foreign women enter the island every year as 'artistes'. **This number is grossly disproportionate to the number of inhabitants in Cyprus and it is important to emphasise here that the number of 'artistes' entering Cyprus does not represent a shortage in labour to fill these positions or are even considered 'labourers'.**

¹³ [Minister of Justice and Public Order, Nicos Koshis, Selides magazine, 26.6.2001, MIGS translation – that would work out at around 350,000 Euro]

¹⁴ CEDAW Committee on the Elimination of Discrimination against Women, Consideration of reports submitted by States parties under Article 18 of the Convention on the Elimination of All Forms of Discrimination against Women Combined third, fourth and fifth periodic reports of State parties Cyprus, page 33, <http://www.un.org/womenwatch/daw/cedaw/35sess.htm>

Under the labour system in Cyprus, migrant workers are employed in sectors where there is shortage in labour in terms of Cypriot or EU nationals, for example, in agriculture/farms, construction, hotels and restaurants. These vacancies are listed in the Cyprus Labour Department and are open to third country nationals [non EU residents] as well as Cypriots. However, both domestic work/care and “entertainment/artiste” vacancies are not listed under the Labour Department which effectively means that these jobs are not available to ‘foreign’ members of Cypriot families or Cypriots seeking employment. In fact, the Cyprus Ministerial Committee in 2005 decided on the establishment of guidelines in relation to the access to the labour force by migrants and among these it is clearly stated that “Third country nationals, members of Cypriot families and holders of Cyprus residency are forbidden from working in cabarets, night clubs, bars etc...”. It should also be noted that this policy does not include all bars and night clubs since a number of Cypriot citizens do, of course, work in bars and night clubs. This policy refers specifically to “high risk” entertainment establishments.¹⁵ This policy is not only discriminatory, **it also points toward a tolerance for the continuation of ‘importing’ women as ‘entertainers’ as long as Cypriot women or foreign women married to Cypriot citizens are in no way involved.**

During the time this research study was being conducted, the Attorney General’s office explained that the Cyprus Government was in the process of discussing whether or not to continue issuing ‘artiste visas’, and whether to include this provision in the new migration law that was being drafted. It was also stated by the Cyprus delegation to the CEDAW Committee during 35th CEDAW Session in 2006 that discussions were underway on the possible replacement of the ‘artiste’ visa with a general work visa for third country nationals. However, the new law was passed in January 2007 and the provision banning specific ‘artiste’ or ‘entertainment’ visas was not incorporated putting into question the will of the government to seriously take radical steps toward the elimination of the phenomenon of trafficking in Cyprus.

In 1998 at the (Parliamentary) House Crime Committee, where MPs discussed the link between prostitution and organised crime, the then Permanent Secretary of the Ministry of Interior stated that “Prostitution will always be there whether it stems from cabarets,

¹⁵ For the purpose of this research report “high risk establishments” shall mean all licensed cabarets and pubs that “recruit” women on “artiste” visas. This categorization is drawn from the Cyprus Government report to the CEDAW Committee 2006, p.33.

night-spots or pubs and we cannot stop it".¹⁶ He added that "the committee is considering limiting the number of foreign artistes at each cabaret. **This would mean, however, that the remaining women would simply have to sleep with more men and closing the cabarets would force the problem underground**".¹⁷ Interestingly enough, the Cypriot government has been discussing the issue of limiting the number of 'artiste' visas since 1998, but since then the number of foreign women working in cabarets has increased rather than decreased (the official number of women under the 'artiste' status in 2003 was 1500). As already mentioned earlier, this is evidence that the operation of cabarets is tolerated and supported by the Cyprus government.

Some Ministry of Interior officials have stated in several instances that it is the choice of a woman to work in cabarets. As one interviewee stated, "When a person comes to Cyprus for the 3 months [that she is allowed] and then re-enters declaring that she has no problem to work as an 'artiste' - then it is her choice. Of course we don't know if their testimonies are true but there is a percentage that is doing it for the money. The majority is doing it for the money and if we study their countries of origin, these are countries with economical problems and they might see this work as a way out".¹⁸

As stated above, one key reason why a woman chooses to migrate is to find better economic prospects because of poverty in the country of origin. **However, in cases where women working on 'artiste' visas leave Cyprus upon expiry of their visa and later re-enter to work as an 'artiste' for another 3 months, no research has been conducted to examine the reasons for this.** The possibility that these women might be re-trafficked or abused and/ or threatened by her employer and/or recruiter has never been systematically addressed. Action for Support, Equality and Anti-Racism [KISA], a NGO working with migrants in Cyprus, stated that:

"we can presume that because of the migration model currently followed by Cyprus and more specifically because of the measures and practices currently followed for artistes, since these women come to Cyprus for 3 months or 6, they will most likely be transferred

¹⁶ Vassiliadou, Myria 'Women's Constructions of Women; On Entering the Front Door', Journal of International Women's Studies, Special Issue: Feminist Challenges: Crossing Boundaries, Vol. 5, #3, May 2004 Also available at : <http://www.bridgew.edu/SoAS/jiws/May04/index.htm>

¹⁷ Ibid

¹⁸ According to the Cyprus law a migrant woman under the status of "artiste" has the right to be employed for three months with the right to renew her visa for another 3 months.

to a 3rd country for another 6 months in order to come back to Cyprus for a further 3 months. Thus, one can easily conclude that the system helps the transit of victims to 3rd countries. We don't, however, have solid facts to confirm that Cyprus is a transit country”.

As indicated previously, not all women working on ‘artiste’ visas can be identified as victims of trafficking. Indeed, some women are aware of the fact that they will be expected to engage in prostitution and, although they may be exploited, they are not in fact ‘trafficked’. On the other hand, there are women who, although aware of the nature of their employment in Cyprus, are ignorant of the conditions of slavery that await them. Others still are completely unaware of the kind of work they are expected to engage in and are therefore the most vulnerable to sexual exploitation.

Most of these women are unable to move freely, are forced to work over and above their working hours, live in desperate conditions, isolated and under strict surveillance. As indicated in the previous paragraph, it appears that a significant number of trafficked women are misled into believing that they are expected to work as waitresses, or barmaids. Instead, these women are forced, through the use of threats and/or violence, into prostitution. According to the independent study conducted by the Office for the Commissioner for Administration (Ombudsman’s Office 2003), traffickers and/or “employers” take possession of their personal documents (visa permit, passports), force them into prostitution and keep them under strict surveillance at all times. When they finish work at the cabaret they are not allowed to go where they please but instead are locked in their room. These women are at great risk of physical and psychological harm as they seem to be modern-day slaves, with their basic human rights violated.¹⁹

Because of intensified international pressure, the Cyprus Government has begun to recognise that the issue of trafficking in human beings requires its full commitment if it is to be dealt with effectively [although at the same time, statements such as the one quoted above by the minister are abundant in the media]. One of the most important efforts of the Cyprus Government to combat trafficking human beings was the

¹⁹ The leading anti-trafficking organization, the Angel Coalition, comprised of 43 NGOs from 25 regions of Russia, issued a report on trafficking of women for 2002. Members documented a repress of trafficking cases. ...One girl returned from Cyprus with a psychological disorder and had to be placed in a hospital in Moscow. <http://www.cdi.org/russia/johnson/7229-12.cfm>

compilation of a National Action Plan to Combat Trafficking in Human Beings (NAP). All the interviewees for the purposes of this research viewed the National Action Plan as a positive start in combating the phenomenon of trafficking in women in Cyprus. Cyprus is signatory to a number of Conventions that have been endorsed into National Law and which relate to trafficking offences including the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Trans-national Organized Crime, known as 'the Palermo Protocol'.²⁰ Despite this legal foundation, the Republic of Cyprus has still to ratify one of the main texts relating to the protection of victims of trafficking, namely, the Council of Europe Convention on Action against Trafficking in Human Beings (although it has signed it).

An example of the recent international pressure on Cyprus to take urgent action against trafficking is the "Victims of Trafficking and Violence Protection Act of 2000: Trafficking in Persons Report" issued by the U.S. Department of State whereby Cyprus is placed on the TIER 2 Watch List.²¹ Countries rated under TIER 2 Watch List are those who have not yet complied with the minimum standards set forth in the Trafficking Victims Protection Act of 2000 (22 U.S.C. 7101 et seq.) but are making efforts to do so. In 2005, the U.S Department rated Cyprus TIER 2 because of the publication of the NAP and the government's apparent efforts to eliminate trafficking. In 2006, however, Cyprus was placed back on TIER 2 Watch List because of its failure to show evidence of increasing efforts to address its serious trafficking for sexual exploitation problem.²² Specifically, the government did not proactively implement its National Action Plan, nor did it formally open a shelter for trafficking victims as it had publicly stated in 2005. Although the government slightly decreased the number of 'artiste' visas issued it failed to fulfil its commitment to abolish this visa category altogether.²³ After release of the 2006 Trafficking in Persons Report public debate ensued regarding US criticism of Cyprus and other countries on this issue. However, discussions largely revolved around the "right" of the United States to judge and criticize Cyprus anti-trafficking efforts rather than focusing on the fact that trafficking in women for the purpose of sexual exploitation is a problem

²⁰ Please see ANNEX A

²¹ The ratings are determined according to each country's compliance to the minimum standards as set out in the Trafficking Victims Protection Act (2000) <http://www.state.gov/g/tip/rls/tiprpt/2004/33192.htm#cyprus>

²² US State Department, 2006, "Trafficking in Persons Report", Washington D.C.: US State Dept. <http://www.state.gov/documents/organization/66086.pdf>

²³ Ibid.

that requires urgent action. In 2007, Cyprus remains on the TIER 2 Watch List because **the Government still does not fully comply with the minimum standards for the elimination of trafficking in human beings.**

The Committee for the Elimination of All Forms of Discrimination against Women [CEDAW] during the Thirty-fifth session, (15 May-2 June 2006) also urged the Cyprus government to take action stating in its concluding comments that:

“While recognizing the important legal and institutional measures taken to combat trafficking, the Committee remains concerned about the persistence of trafficking and exploitation of prostitution of women. It is particularly concerned about the precarious situation of cabaret artists, as well as the insufficient available research on the extent of the phenomenon of trafficking and exploitation of prostitution of women...The Committee requests the State party to continue with its efforts to combat trafficking and calls on the State party to commit to the full and speedy implementation of the Plan of Action already in place. It calls on the State party to conduct qualitative and quantitative research on the extent of this phenomenon and to develop and implement without delay the large-scale public awareness campaign foreseen in the Plan of Action. The Committee also requests the State party to closely monitor the issuance of the new work visas which are due to replace the existing artist visas.”

Thus, **despite recent efforts made by the Cyprus government to combat this phenomenon, there seems to be a significant gap between stated policies and their actual implementation.**

2.2 Legally Speaking

There have been many developments on the legislative level in order to combat trafficking in women in Cyprus. However, it is indicative of the general situation in Cyprus on this issue that the government report to the CEDAW Committee in May 2006 concentrates only on legislative developments and does not make any reference to measures for the implementation and monitoring of these provisions.²⁴

Prior to 1997, there existed no legislation regulating the operation of private employment agencies, for the purpose of controlling and monitoring their activities. According to the Commissioner for Administration in 1997 a Law to this effect did, in fact, pass and three

²⁴ CEDAW Committee, 35th Session, 15 May - 2 June 2006, Concluding comments of the Committee on the Elimination of Discrimination against Women, Cyprus, paragraphs 27-28, <http://www.un.org/womenwatch/daw/cedaw/35sess.htm>.

years later, in 2000, employment agents were required to apply for licenses of operation, which is now obligatory under the law. **However, in 2000 the law was suspended because the majority of agents did not meet its requirements and could not be granted a license of operation. Apparently for this same reason, the law was amended in order for employment agencies to receive a license without having to meet the stringent requirements of the 1997 law!**²⁵ Despite the law being created and passed for the purpose of controlling and monitoring employment agencies that are active in the recruitment of women for the purposes of employment as ‘artists’ or ‘entertainers’, it has not been effectively implemented and as a result of this lack of effective control, in 1982, there were 51 cabarets, 57 in 1990, and 108 in 2002 **reflecting an 111% increase.**²⁶ According to the Office of the Commissioner for Administration this number does not include a substantial number of nightclubs/ cabarets that may be operating without the required licence.

When asked about demand for sexual services in Cyprus, none of the interviewees reflected on the significant increase in the number of cabarets in recent years and the implicit consent of the Cyprus Government to this rise. Yet, this increase emphatically points to an increase in demand for sexual services and the demand to “employ” women for such services. Cabarets are considered “high risk” establishments for the trafficking of women for sexual exploitation and are the targets of periodic police raids (the only existing statistics on trafficked women in Cyprus are the result of such raids). Considering this, the will of the Cyprus government to combat trafficking in women is questionable: the operation of cabarets is tolerated if not supported by the government through the provision of cabaret operation licences. One could even venture to say that this support can be described as the legalization of trafficking in women for the purpose of sexual exploitation: “... *in the destination counties, exploiters exert pressure on the lawmakers and officials to create conditions that allow them to operate. They use power and influence to shape laws and policies that maintain the flow of women to their sex industries*”.²⁷

²⁵ Commissioner for Administration [Ombudsman’s office 2005] presentation at the conference entitled Trafficking in Human Beings organised by the Swedish Embassy, October 2005

²⁶ Ibid

²⁷ “The Demand for Victims of Sex Trafficking”, Donna M. Hughes, & Eleanor M. and Oscar M. Carlison Endowed, 2005.

Despite the existence of legislation to combat trafficking in human beings in Cyprus and the government's asserted willingness to combat this phenomenon, these efforts are undermined by the increase in cabarets and the issuing of specific visas for 'artistes' to work in the specific nightclubs. The Cyprus Immigration Law that allows for 'artiste' visas was recently under evaluation and the specific committees were considering abolishing such visas. **However, the 2007 Immigration Law failed to abolish the 'artiste' visas.**

The Combating Trafficking in Human Beings and Sexual Exploitation of Young Persons Law (L. 31(I)/2000) **provides for the protection, compensation and rehabilitation of victims of trafficking. However, there is no evidence from this research study that these provisions have been effectively implemented.** Recently a new law entitled Combating Trafficking and Exploitation of Human Beings and Protection of Victims Law (L.87(1/ 2007] was drafted and published in 2007 that effectively completes the previous law. As the law has only recently been passed by Parliament and is in the early stages of implementation, one cannot comment on its implementation at this stage. However, the new law **still fails to address the particularities and specificities of the gender dimension and the important issue of demand for services of sexual exploitation.**

Cyprus's penal code criminalizes prostitution in general, including soliciting, living off profits of prostitution and maintaining or managing a brothel. The Combating Trafficking in Human Beings and Sexual Exploitation of Young Persons Law (L.3(I)/2000) criminalized the trafficking of human beings for the purposes of sexual exploitation, regardless of the victim's initial consent or knowledge of the fact that she will be trafficked. Surprisingly, however, **the new Law Combating Trafficking and Exploitation of Human Beings and Protection of Victims Law (L.87 (1/ 2007] does not include a clause emphasising the irrelevance of the consent of the victim, a serious deficiency which is not in line with the Council of Europe Convention on Action against Trafficking in Human Beings Article 4 (b) and the Palermo Protocol. More importantly, the legal framework is inconsistent with the government's policy of allowing the operation of establishments considered 'high-risk' and the issuing of visas for the purpose of working in such 'high risk' establishments.**

A significant provision in the law is the appointment of the Guardian of Victims of Sexual Exploitation. The Guardian of Victims of Sexual Exploitation is the Director of

Department of Social Welfare who is responsible for the provision of support, protection and assistance to the victims. However, despite public pronouncements for the establishment of a shelter specifically for victims of trafficking, the government has yet to fulfil this commitment and consequently, the Department of Social Welfare currently places victims in homes for elderly people which does not provide adequate prevention from further abuse [for example sexual harassment from staff etc] nor provide an environment for appropriate psycho-social support. **MIGS is highly concerned about the extent to which placing victims in homes for the elderly ensures their physical safety, as their locations are publicly known.**

The Prevention and Suppression of Money Laundering Law (L. 61(I)/96) is also a very important piece of legislation, since it allows for the tracking down, freezing of assets and the confiscation of profits that have been acquired through the commission of criminal acts including trafficking and prostitution.²⁸ The same law also provides for the investigation into suspect peoples' financial situation. Again, however, there is no evidence that this law is being effectively implemented.

Lastly, the Witness Protection Act (L. 95(I)/2001) provides trafficked victims protection, such as a change of location, change of identity and so on but in order to receive this protection victims must agree to cooperate with the authorities.²⁹

Thus, although Cyprus has set a relatively acceptable legislative foundation for combating trafficking, emphasis needs to be put on implementation and monitoring and as well as evaluation and improvement as needed to reflect new realities.

2.3 The Cyprus National Action Plan to Combat Human Trafficking

On 19 September 2001 the Council of Ministers, having discussed the problem of human trafficking in Cyprus, decided to appoint a group of experts to coordinate actions

²⁸ Commissioner for Administration [Ombudsman 2005] presentation at the conference entitled Trafficking in Human Beings organised by the Swedish Embassy, October 2005

²⁹ Ibid

to combat human trafficking and the sexual exploitation of young persons.³⁰ The **Group of Experts**, consisting of governmental departments as well as NGOs, drafted the National Action Plan [NAP] after a total of eight meetings where they examined recommendations for measures needed to be undertaken to successfully combat the phenomenon, as well as of policies and measures already implemented.³¹ Thus, the NAP is the result of a collaborative effort by both governmental departments and NGOs and is based on international and national legislation. However, the NGO representatives have reported that the NAP coordination committee did not grant them sufficient time to present their suggestions.

The NAP focuses on primarily on measures related to prevention, persecution, and protection, and each governmental and non-governmental organization involved in the drafting of the NAP has been assigned responsibility for the implementation of a share of these according to their respective areas of expertise. MIGS notes that the **Ministry of Health and the Labour Department did not participate in the Group of Experts and stresses that both of these government departments should have been involved in the process of drafting the NAP as they could potentially play a key role in prevention and protection of victims of trafficking.** For example, women entering Cyprus on 'artiste' visas (as well as other migrants under any status) are required to visit the general hospital for a medical examination. It could be argued that since these women are particularly at risk and actually spend ten to fifteen minutes alone with a doctor or nurse, the latter could play a vital role in the identification of victims of trafficking provided they receive adequate training in this respect. During these medical examinations they are also provided with contraceptives [condoms]. This also points towards **the government recognition of the true nature of cabarets and other "high risk establishments" in Cyprus and the tolerance on behalf of the government to this phenomenon.**

As far as the Labour Department is concerned this department should be responsible for drafting the employment contracts of the women entering Cyprus under the status of 'artiste' in order to ensure their protection. As it stands today the contracts of employment are drafted by the Ministry of Interior, Civil Registry and Migration Department. This issue will be further examined below.

³⁰ Decision no. 54.281

³¹ Please see ANNEX B for the list of experts

3. Prevention

According to the Report of Experts Group on Trafficking in Human Beings of the European Commission the prevention of trafficking in human beings comprises a wide range of strategies, which seek to reduce the risk of the crime occurring and its potential harmful effects on individuals and the society.³² These strategies have to be based on a broad, multidisciplinary knowledge of trafficking in human beings and its causes, as well as counter-trafficking best practices. At the same time, measures should be gender-sensitive and incorporate a human rights perspective.

The Comprehensive European Strategy “Trafficking in Women: The misery behind the fantasy- from poverty to sex slavery” points to the need for the preventive measures by both the government as well as the NGOs to work on promoting gender equality and struggling against poverty and on examining the reasons why trafficking in women is developing instead of diminishing. MIGS’ interviews indicated that **women become victims of trafficking due to the gender inequality and poverty they face in their countries of origin as well as the host country.** Furthermore, when the interviewees were asked about the causes of demand for sexual services, all of them uncritically stated that it is because of the so-called ‘Cypriot mentality’, resulting from patriarchal social attitudes according to which a man’s desire for sex is considered a primal need that needs to be satisfied, and it is a woman’s responsibility to provide this satisfaction.

In order to alter such social attitudes towards the sexual exploitation of women, long-term preventive measures are crucial. According to the aforementioned report, actions in this field shall include training on equality legislation for the legal professions, labour inspectorates, social partners and NGOs in the EU and in the candidate countries; research and data collection on the gender dimension of health and safety at the work place and, development of structures in support of the implementation of gender equality matters in the candidate countries.³³ **In order to understand trafficking in women it is essential to address the most important factors contributing to its prevalence.**

³² Brussels, 22 December 2004, Report of Experts Group on Trafficking in Human Beings, European Commission, Directorate- General Justice, Freedom and Security

³³ Comprehensive European Strategy Trafficking in Women: The misery behind the fantasy- from poverty to sex slavery

These include the root causes of trafficking as well as the issue of demand, research, awareness-raising, and training.

3.1 Root Causes of Trafficking - Of Demand and Other Evils

To manage successful prevention measures, governmental departments - together with NGOs need to first address the root causes of trafficking. It must be stressed here that the root causes of trafficking are not at all analyzed or addressed in the Cyprus NAP. These causes can be very complex and are related to globalization, poverty, gender discrimination, ethnic and racial discrimination, **demand for sexual services**, migration policies, unemployment etc. The report of the Experts' Group on Trafficking in Human Beings by the European Commission identifies poverty and unemployment in countries of origin as push factors and points out that these factors act, together with gender inequality, discrimination, and tolerance of violence against women, (both in countries of origin and destination countries) as push factors for women to migrate. The report indicates to the need of addressing root causes not only in countries of origin but in destination countries and points to the importance of "the promotion of managed migration, the protection of migrants' rights, the enforcement of labour standards and the formal and informal organization of workers and other groups affected, can have in reducing trafficking."³⁴

An equally important point is that trafficking prevention strategies should not only be in accordance to human rights norms but should incorporate a gender perspective and have as a priority the protection of the women affected. MIGS cannot stress enough that the Cyprus legislation on trafficking should be gender specific. Though the Cyprus government recognizes that the persons trafficked to Cyprus for the purposes of sexual exploitation are predominantly [if not all] women [and sometimes girls], no specific measures, strategies or activities to combat trafficking take gender specifically into account. MIGS considers this to be a serious flaw in the legislative framework.

³⁴ Brussels, 22 December 2004, Report of Experts Group on Trafficking in Human Beings, European Commission, Directorate- General Justice, Freedom and Security

The demand for sexual services is recognized as one of the most important root causes of trafficking for sexual exploitation. This issue is given special attention in this report. The issue of **demand** for sexual and other services has more recently emerged in discussions to address problem of human trafficking. The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children attached to the United Nations Convention against Transnational Organized Crime (2000) (Palermo Protocol) encourages States “to discourage the demand that fosters all forms of exploitation of persons”.³⁵ Other efforts have also been taken on an EU level to address the issue of demand. According to the report “The Mekong Challenge Human Trafficking: Redefining Demand” by the International Labour Organization, demand has helped turn the trafficking issue in a new direction. It has opened up questions on definition and what precisely constitutes “demand”.³⁶ **As a country of destination, Cyprus should incorporate the issue of demand into all its anti-trafficking efforts.**

No international convention on trafficking has yet provided a clear definition of ‘demand’. It has been argued that demand arises from three main sets of actors: the men who buy commercial sex, the exploiters who make up the sex industry, and the states that are destination countries, all working together in a culture that tolerates or promotes sexual exploitation.³⁷ For the purposes of this report MIGS focuses on the three components that drive the sex industry from the outside: **destination countries, men who buy commercial sex, and the culture that tolerates or worse, promotes sexual exploitation.**

MIGS reiterates that in the case of Cyprus, the government seems to tolerate trafficking for the purpose of sexual exploitation by contributing to demand for sexual services through the issuing of specific ‘artiste’ visas as well as of licences for the operation of “high risk” establishments. Although demand is widely recognized as a driving force of trafficking for the purpose of sexual exploitation, the Cyprus government has turned a blind eye to this and worse, has not incorporated this

³⁵ Protocol available at <http://untreaty.un.org/English/notpubl/18-12-a.E.htm> and its legislative guide at http://www.unodc.org/pdf/crime/legislative_guides/03%20Legislative%20guide_Trafficking%20in%20Persons%20Protocol.pdf

³⁶ “The Mekong Challenge Human Trafficking: Redefining Demand” by the International Labor Organization, 2005 <http://www.ilo.org/public/english/region/asro/bangkok/child/trafficking/downloads/demand.pdf>

³⁷ “The Demand for Victims of Sex Trafficking” Donna M. Hughes, Eleanor M. and Oscar M. Carlison Endowed, 2005.

issue in any of its ant-trafficking efforts: “officials in destination countries do not want to admit responsibility for the problem of sex trafficking or be held accountable for creating demand for victims. “In destination countries, strategies are often devised to protect the sex industries that generate millions, even billions, of dollars per year for the economy.....in the destination countries, exploiters exert pressure on the lawmakers and officials to create conditions that allow them to operate. They use power and influence to shape laws and policies that maintain the flow of women to their industries...”³⁸

As mentioned above, most interviewees from NGOs and governmental departments in Cyprus acknowledged the demand factor in trafficking in women and claimed that demand stems from Cypriot patriarchal culture and society and the mentality of Cypriot men. Most interviewees believed that there is a **huge crisis taking place in Cypriot families and that this is leading men to look for satisfaction in sexual relationships outside marriage.**

Other reasons stated by many of the interviewees included:

- a. Imitation and/or peer pressure (“when we see our neighbour, friends acting in a certain way we often act in the same way, especially in smaller communities”!!)
- b. The ‘Cyprus mentality’: “Cypriot men believe that if a man has, for example, sexual relationships [extramarital relationships] with Eastern European women he is ‘cool’ and ‘manly’ and therefore an example to follow and a way of re-enforcing male Cypriot identity. This is also the case even if a man is not married, hence the similitude of demand regardless of status, i.e. it’s ‘mangkia’ [macho] to have sexual relationships with more than three women simultaneously, whether married or unmarried...”
- c. Stereotypes: Cypriot women are thought to be conservative while foreign women are considered more sexually liberated and therefore desirable. The combination of their ‘beauty’ and poverty is what renders them readily ‘available’, ‘attractive’, and ‘needy’, therefore ‘submissive’.³⁹

³⁸ “The Demand for Victims of Sex Trafficking” Donna M. Hughes, Eleanor M. and Oscar M. Carlison Endowed, 2005

³⁹ See extensive analysis at Vassiliadou, Myria ‘Women’s Constructions of Women; On Entering the Front Door’, *Journal of International Women’s Studies*, Special Issue: Feminist Challenges: Crossing Boundaries, Vol. 5, #3, May 2004 Also available at : <http://www.bridgew.edu/SoAS//jiws/May04/index.htm>

Sharing MIGS concerns, KISA, a migrant rights organisation in Cyprus, points out that no research has ever been conducted to examine the demand side of trafficking in Cyprus and thus the above can only be a result of personal beliefs and observations, themselves reflecting the 'Cyprus mentality' and stereotypes and perpetuating the problem.

Further, some interviewees suggested that another factor affecting demand for sexual services in Cyprus is the tendency to stereotype women, and particularly Eastern European women, as sex symbols. Besides pornography, women are presented in a particular ways in popular culture and the media in general in ways that reinforce the stereotypes of women as either mothers or as sex symbols.⁴⁰

MIGS research indicates an increase in marriages between 'artistes' and Cypriot men resulting in the removal of these women from sexual exploitation although numbers are clearly hard to verify for obvious methodological difficulties. It has also been noted that many of these marriages end up in divorce. In fact, there is evidence to suggest that while in relationships, these women are subjected to severe physical and psychological abuse from their Cypriot husbands, often with excuses relating to these women's sexual 'promiscuity' and their partners' jealousy. According to the Association of the Prevention of Domestic Violence many incidents they have dealt with (involving foreign women as victims of domestic violence) actually involve victims of trafficking who have been extricated from these situations through wedlock to Cypriot men who opted to form a relationship with these women. However, the fact that these women were 'liberated' by their Cypriot husbands seemed only to have led them to other, even worse perhaps, circumstances of exploitation, as they were still more vulnerable than Cypriot women in terms of overall empowerment.

3.2 The need for statistics and research

MIGS stresses the importance of research as an important medium for identifying the different factors affecting demand. Research would also serve to examine the

⁴⁰ For more information about stereotypes and the media please refer to the "Gender and Media Hadnbook" at <http://www.medinstgenderstudies.org/wp/?p=22> published by the Mediterranean Institute of Gender Studies.

effectiveness of policies currently being implemented by the state as well as the data collection output. The European Parliament Resolution on strategies to prevent the trafficking of women and children who are vulnerable to sexual exploitation (2004/2216(INI)) emphasizes the importance of research into the underlying causes of trafficking and the factors affecting demand for sexual services and sexual exploitation of women and children.

The European Parliament is currently promoting the criminalization of the demand for sexual services in the cases of coercion into prostitution.⁴¹ Although some interviewees agreed that such a measure should be incorporated into the Cyprus law, others disagreed. For example the Attorney General's office explained that "the reason for the implementation of such a measure is for governments to be able to take buyers of sexual services to court as witnesses in trafficking cases." They also stated, however, that such a measure would never succeed in Cyprus due to the fact that it is such a small community and thus criminalizing buyers would instead discourage them further from cooperating with authorities in the prosecution of traffickers.

NGOs interviewed agreed that to add this specification in the legislation would never succeed in itself but if the government does decide to incorporate demand in the anti-trafficking legislation, it should be part of a comprehensive package of anti-trafficking measures and policies. KISA argued that this measure carries some positive and negative aspects. The positive aspect is that by modifying the law, clients may be forced to think twice before purchasing sexual services. The negative aspect is that in cases where the victim is isolated and their only contacts are clients, such a law would eliminate any chance of using these clients to escape their situation, as has happened in some cases.

Although trafficking in human beings is stated as a priority for the Cyprus Government and for NGOs, research and data collection about the problem and changing trends remains very limited. As stated in the Report of Experts Group on Trafficking in Human Beings, "one of the biggest problems in the understanding of trafficking is in the area of

⁴¹ European Parliament resolution on strategies to prevent the trafficking of women and children who are vulnerable to sexual exploitation (2004/2216(INI))

statistics and data collection”.⁴² As indicated previously, the only statistics we have in Cyprus are those collected by the Police Department and which are not indicative of the issue in question.

Although the Cyprus Government has recognized the extent of the trafficking problem and efforts are being made to work with relevant NGOs to conduct research on the issue, still the government has not offered adequate funding to support any research related to the subject. **This contradicts Article 35 of Council of Europe’s Convention on Action against Trafficking, which stresses the importance of cooperation with civil society and of establishing strategic partnerships aiming towards the achievement of the purposes of the Convention.**

There are some welcoming efforts currently undertaken by the US embassy in Cyprus to support civil society in terms of providing financing to relevant NGOs for activities for combating trafficking. However, the US embassy in its eager effort to support the NGOs of both communities (Turkish Cypriots and Greek Cypriots), focuses more on the bi-communal element of their work rather than on the content and fight against trafficking itself. The result is that the impact of such research is limited and concrete results scarce.

There is thus need for holistic research that covers clients’ and employers’ profiles, levels of awareness and participation in the trafficking market. Such research could then form the basis of awareness-raising campaigns and consequently reduce participation in the trafficking chain.

3.3 Lacking Awareness

Article 29 of the European Parliament’s resolution on strategies to prevent trafficking in women and children who are vulnerable to sexual exploitation (2004/2216(INI) “calls on the Member States to establish and/or strengthen awareness-raising campaigns targeted at providing information about the dangers of trafficking and educating vulnerable members of society in the countries of origin as well as to alert and raise the

⁴² Brussels, 22 December 2004, Report of Experts Group on Trafficking in Human Beings, European Commission, Directorate- General Justice, Freedom and Security

awareness of the public about the problem and thereby aim to reduce the demand in the countries of destination...”.⁴³

Awareness-raising is an important measure that aims not only at prevention of trafficking in women but also at prosecution and protection through the provision of information to influence public opinion, to increase the capacity of institutions, organizations, groups and individuals to address the issue of trafficking in women adequately, and to disseminate information on the assistance and services available for the protection of victims of trafficking. The media has further a key role in achieving the above.⁴⁴

It is important that awareness-raising activities be preceded by a thorough assessment in order to comprehensively understand the phenomenon, identify potential target groups and design effective interventions tailored to the needs of specific groups. Also, **awareness-raising activities from a gender sensitive perspective should rely on cooperation with all relevant actors, governmental and non-governmental organizations.**⁴⁵

According to the report by the Office for the Commissioner for Administration 2003, the measures taken by the Cyprus Government to combat trafficking are inadequate as they largely focus on limiting the number of “cabaret artists” entering Cyprus, enforcing stricter criteria for entry, and attempting to control the operation of private employment agencies. In addition, none of the above has succeeded as they have not been supported by awareness-raising activities until only very recently.

The only awareness-raising activity taken by the Cyprus government and more specifically the Ministry of Interior, has been the publication of **information leaflets** in 2005 that highlight the rights and obligations of migrant women who enter Cyprus to

⁴³ P6_TA(2006)0005 Combating the trafficking of women and children, European Parliament resolution on strategies to prevent the trafficking of women and children who are vulnerable to sexual exploitation (2004/2216(INI)) http://www.emergendo.it/parlamento_europeo170106.pdf

⁴⁴ “The Gender and Media Handbook” published by the Mediterranean Institute of Gender Studies at <http://www.medinstgenderstudies.org/wp/?p=22> . MIGS is extremely concerned about the relationship of Media and Gender Issues in Cyprus.

⁴⁵ Brussels, 22 December 2004, Report of Experts Group on Trafficking in Human Beings, European Commission, Directorate- General Justice, Freedom and Security

work in cabarets and are possible victims of trafficking.⁴⁶ These leaflets are considered by the Ministry of Interior as a best ‘practice’ to preventing trafficking in women. According to the Ministry the leaflets are handed out to migrant women who come to work on ‘artistes’ visas at the Immigration Department where they register upon their arrival. These leaflets have also been sent to foreign embassies in Cyprus representing their countries of origin. The leaflets have also been uploaded on the Ministry’s website. However there is no evidence to show that these women are actually informed about their rights, or even receive these leaflets upon arrival and no evaluation has taken place to evaluate the impact of these leaflets. KISA has noted that the information provided through the leaflets is limited since the leaflets do not include the risks these women are taking by migrating to Cyprus, especially under the status of ‘artiste’.

MIGS has additional reservations on the content and information provided in these leaflets. **Having studied ‘artiste’ contracts, it is clear that no obligations or rights are included in the contract.** It should be stressed these specific contracts are prepared by the Migration department without the consultation of the Ministry of Labour who are the responsible authority for labour issues. **A closer reading also reveals that the leaflets contradict the employment contracts in various ways, rendering the information provided in the leaflets misleading or false.** For example the leaflets state that:

*“The employer does not have the right to deduct from the salary of the employee the value of the ticket, fees he paid to his agent or any other expenses he incurred for **HER** arrival and employment in the Republic”.* [MIGS bold]

Yet, in the one-page employment contract that is signed by the contracting parties (the manager of the night club, the agent and the ‘artiste’), Section B states the deductions of the salary of these women and they include among other things, the ticket fares to and from Cyprus and the agent’s commission.⁴⁷

The employment contract is in fact a legal document that specifically permits ‘debt bondage’. Debt bondage refers to the condition whereby women are held against their

⁴⁶ See ANNEX D for information leaflet

⁴⁷ Please see ANNEX E to view the contract of employment

will as they must 'repay' their purchase price, travel expenses and all other expenses incurred by their employers. These 'debts' can be considerable and therefore the women are virtually enslaved and manage to keep little, if any, of the money they earn. Often, their only way out of the sex industry is through a police raid or through "sympathetic" clients who may inform the authorities about the situation. Many publicised examples exist of women who are sold from one pimp to another at the time when their 'debts' have been repaid and new 'debts' accrued, which may be double of triple of the initial one.⁴⁸

According to the police, other activities aimed at raising awareness are being planned for the near future. For example, the police department plans to organise training seminars targeting immigration police officers on the identification of victims of trafficking. Although it is not within the competencies of the Social Welfare Department to organise awareness-raising activities, they expressed their willingness to participate in any awareness raising activity organised by the Ministry of Interior who are the coordinators of the National Action Plan to Combat Trafficking.

There have also been efforts by non-governmental organizations at raising awareness on the issue of trafficking in human beings, admittedly most of them limited to lectures and discussion panels. MIGS has published awareness-raising leaflets and posters (funded by the National Machinery for Women's Rights of the Ministry of Justice) targeting students, policy makers and government officials, as well as the general public.⁴⁹ These were widely disseminated in college campuses, the University of Cyprus, have been posted in the one the main streets of the Nicosia and the Limassol municipality, and sent electronically to hundreds of organisations and institutions both in Cyprus and abroad.

Since there are no specialized NGOs working on trafficking in Cyprus, no other awareness-raising activities are currently being conducted in Cyprus. KISA has taken the initiative to create an anti-trafficking coalition with other NGOs (including the Cyprus Family Planning Association and the Association of the Prevention of Violence in the

⁴⁸ "Ukrainian police arrest sex trade gang," Newslines Vol. 3, No. 54, Part II (Prague, Czech Republic: Radio Free Europe/Radio Liberty, 18 March 1999). Regional Security Office, U.S. Embassy, Kyiv, Ukraine, Crime Digest, March 1999, <http://www.usemb.kiev.ua/rso/CrimeDigest9903.html>

⁴⁹ <http://www.medinstgenderstudies.org/wp/?p=25>

Family) and are planning to carry out awareness-raising activities targeting the public. The Cyprus Family Planning Association and the Association of the Prevention of Violence in the Family are also planning on organising a number of awareness-raising activities (trainings, seminars, workshops) related to the immediate objectives of their organisations but with only a very small part focusing on trafficking in women.

3.4 Media Power and Trafficking

The media is a powerful tool for awareness-raising and can contribute toward the prevention of trafficking in women for sexual exploitation. However, the media been ignored by the government in their anti-trafficking initiatives. As mentioned above, the media reinforces traditional gender stereotypes and this is equally true when reporting issues related to trafficking. Emphasis is usually placed on reporting ‘shocking’ events regarding the abuse and/or exploitation of migrant women rather than raising awareness and there is rarely any media follow-up on cases of trafficking.⁵⁰

MIGS stresses that educational efforts and awareness campaigns on trafficking in human beings is a powerful tool in creating a public social conscience and can greatly contribute toward naming and shaming the clients, as well as the “agents” and managers, of cabarets and nightclubs that are involved in trafficking and the exploitation of trafficked victims.

To this day, however, there have been no significant efforts to alter people’s perceptions and prejudices as far as these women are concerned. This is exacerbated by the fact that the victims of sexual exploitation live outside conventional locations, in places where “they will not challenge public ethics”, usually in disreputable neighbourhoods. By placing them out of sight and essentially out of mind, the women’s dependency on their employers is reinforced, and their feelings of insecurity and despair exacerbated, making recourse to the relevant authorities out of the question.

All interviewees for this research study agreed that the media can play a vital role in the prevention of trafficking by eliminating stereotypes against women in general and in

⁵⁰ CEDAW Convention on the Elimination of All Forms of Discrimination against Women, MIGS Shadow report on Cyprus submitted to the CEDAW in March 2006 http://www.medinstgenderstudies.org/wp/wp-content/uploads/cyprus_shadowreport_final3.pdf

particular trafficked women. It was also noted that governmental policies and attitudes help to shape and reinforce the public's opinion on the issue. Statements such as those of the former Minister of Justice that stated on public television that "the dream of 45% of women is to become prostitutes" reflect the general mentality of the public in Cyprus.⁵¹

The general opinion of the public towards women working in cabarets and other "high risk establishments" is negative and one often hears Cypriot women accuse them of coming to Cyprus "to take our men" and that these women are a "direct threat to their marriages, and thus the 'legitimization' of their status in society, Eastern European women are expected to leave the island and 'leave us in peace'".⁵² As Myria Vassiliadou notes, "although most of them (Cypriot women) claimed to acknowledge women's oppression, they appeared inflexible and intolerant in their attitudes and behavior toward 'other women', especially if these are prostitutes".⁵³ By not enlightening the public of the true status of many of these women as victims of sexual exploitation we encourage their labelling as prostitutes and promote the mistreatment that result from such stereotypes. The media can be a powerful ally in such endeavours and play an indispensable role in educating us and presenting the problem in human terms. Reports on issues related to trafficking should not merely describe an incident or case but also include criticism in cases where these women are mistreated by employers, and/or the authorities, and it should also promote these women's status as victims of trafficking rather than criminals. They must make use of the 'naming and shaming approach', so as to protect the victims and identify traffickers.⁵⁴

4. Protection

As the Brussels Declaration on Prevention and Combating Trafficking in Human Beings reports, to effectively combat trafficking, all procedures from prevention to persecution and from protection to assistance of victims need to be addressed.⁵⁵ According to the Report of Experts Group on Trafficking in Human Beings: "The neglect of the area of assistance and protection to trafficked persons forms both an obstacle to effectively

⁵¹ Cyprus mail newspaper archive article - Friday, December 5, 2003

⁵² Vassiliadou, Myria 'Women's Constructions of Women; On Entering the Front Door', Journal of International Women's Studies, Special Issue: Feminist Challenges: Crossing Boundaries, Vol. 5, #3, May 2004 Also available at : <http://www.bridgew.edu/SoAS/jiws/May04/index.htm>

⁵³ *ibid*: [insert page number]

⁵⁴ Commissioner for Administration [Ombudsman's office 2005]

⁵⁵ Brussels Declaration on Preventing and Combating Trafficking in Human Beings http://www.coe.int/t/dg2/trafficking/campaign/Docs/OrOrg/Bruxdoc_en.pdf

address trafficking and falls short of the obligations that States have under international human rights law to provide victims of human rights violations with effective remedies... The absence of adequate procedural safeguards and assistance may prevent trafficked persons from reporting to the authorities and inadvertently expose them to further trauma and the risk of reprisals by traffickers, including the risk of being re-trafficked".⁵⁶

4.1 *Sheltering the 'Victims'*

Though the Cyprus Government, and more specifically the Social Welfare Department which legally constitutes the guardian of victims of trafficking, has publicly stated on a number of occasions it would be securing a safe shelter for victims of trafficking, this promise has yet to be fulfilled. According to the National Action Plan, a shelter for victims of trafficking should have already been established in June 2005. To the present day, the Social Welfare Services place victims in homes for the elderly until their cases are examined in court and are provided with a daily subsistence allowance of 10 CYP (17 EURO).

Placing victims in homes for the elderly is an unacceptable alternative to a specialised shelter with the necessary infrastructure to adequately support and protect them. According to the Attorney General's office, however, the current protection measures are satisfactory even though there is space for improvement. The Attorney General's office also explained that the government budget should be taken into account and that currently there is no adequate funding for a specialized shelter.

The Social Welfare Department first announced its intention to establish a shelter for victims of trafficking to the press and sought the assistance and co-operation of NGOs. According to the Social Welfare Department NGOs did not show any interest in undertaking the responsibility of running a shelter although they did offer to cooperate and contribute. This was stated as the reason for the delay in the establishment of a shelter. However, since the law indicates the Social Welfare Department as the guardian of victims of trafficking, the responsibility for the establishment of a shelter clearly lies with them and not with NGOs, particularly since there are currently no NGOs

⁵⁶ Brussels, 22 December 2004, Report of Experts Group on Trafficking in Human Beings, European Commission, Directorate- General Justice, Freedom and Security

in Cyprus specialized in providing assistance to victims of trafficking. The policy of sharing responsibility with NGOs and buying services from them is common practice in Cyprus and one that often undermines the independence of NGOs and their capacity to act as pressure groups.

MIGS's interviews with the Social Welfare Department resulted in no examples of best practices since the only 'best practice' currently followed is to offer the right information to the victim. This should not be an example of good practice but rather an obligation of the welfare department as legal guardian of victims of trafficking. A number of EU programmes such as AGIS or DAPHNE have gathered exhaustive information on best practices followed in the EU that the Social Welfare Department has the responsibility to become aware of and adapt to the Cypriot context.

The police readily admit that current protection measures are weak and in need of improvement. The police acknowledge that the premises currently used as shelters are not at all suitable, and results have not been positive even if the Social Welfare Department does offer some psychological and financial support to victims. These shelters, according to the police "reinforce victims' feelings of abandonment, hopelessness and helplessness and, therefore, they often do not want to testify which results in their deportation". The situation is exacerbated by the fact that court hearings are often delayed or postponed. As a consequence, these women become desperate and disillusioned making it difficult for the police to convince them to stay on in Cyprus and testify. This has led to the impression that the police are "not doing their job properly".

Furthermore, the National Action Plan does not mention any empowerment strategies for the victims and it does not touch upon the issue of the social inclusion of those who wish to stay in Cyprus. NGOs can play a crucial role in this respect and can help in providing assistance to trafficked persons.

4.2 Identifying the 'Victims'

An important prerequisite to offering adequate protection and assistance is to be in a position to identify possible victims of trafficking. Identifying trafficked persons is a fundamental problem in all anti-trafficking strategies and another critical issue faced by

the Cyprus government. The Report of Experts Group on Trafficking in Human Beings explains that “those caught up in human trafficking often do not want to reveal their status or experiences to State authorities. Frequently, trafficked persons fear violent retaliation by traffickers against themselves and/or children as well as other family members at home, including arrest and deportation by the authorities. For these reasons trafficking in human beings is too often an invisible phenomenon.”⁵⁷

Further, the UNHCR explains that “proactive identification of trafficking victims by law enforcement and immigration authorities is vital, but the similarity of some trafficking scenarios to smuggling and illegal employment makes this a difficult task. As a result, many countries have created screening processes, established referral mechanisms and trained police and social workers to spot possible trafficking cases”.⁵⁸

The identification of a trafficked person can indeed be a complex process requiring professional guidance and adequate support structures to create a safe space for the person concerned. Article 10 of the Council of Europe’s Convention on Action against Trafficking makes it an obligation for state parties to identify victims of trafficking. The Convention states that “Each Party shall provide its competent authorities with persons who are trained and qualified... in identifying and helping victims,... and ensure that the different authorities collaborate with each other as well as with relevant support organizations, so that victims can be identified in a procedure duly taking into account the special situation of women.” Trafficked women are expected to be identified by law-enforcement agencies i.e. front-line officers and border guards. However, research in other European countries indicates that only a limited number of trafficked persons are identified in this way. **The fact that the Cyprus National Action Plan as well as the recently adopted law on trafficking does not have a mechanism for identifying trafficked victims constitutes the root cause of victims’ wrongful exclusion from the protection of the law. The new law on trafficking recently passed by Parliament L 87 (1/2007) states that the responsible bodies for the identification of victims of trafficking are the Police and the Social Welfare Services. However, the**

⁵⁷ Brussels, 22 December 2004, Report of Experts Group on Trafficking in Human Beings, European Commission, Directorate- General Justice, Freedom and Security

⁵⁸ The State of the World’s Refugees 2006 - Chapter 1 Current dynamics of displacement: Box 1.3 Protection for victims of trafficking <http://www.unhcr.org/cgi-bin/texis/vtx/publ/opendoc.htm?tbl=PUBL&id=4444d3c119>

law does not provide for any guidelines or mechanism for victim identification leaving it to the discretion of the Police or Social welfare staff.

Proper identification should be carried out by all relevant actors involved in combating trafficking: the police, governmental bodies and services, NGOs etc. These actors should be trained and proper referral systems should be established. The possible consequences of failing to properly identify a victim and of not establishing adequate referral systems are: the criminalisation of a victim of crime, the re-victimisation and/or re-trafficking of a victim, the lack of information or cooperation to initiate investigation, and the impunity of traffickers and exploiters.

The Cyprus Welfare Department agreed that the process of identifying victims is seriously lacking in Cyprus and stated that the new law should have been clear in this respect and have specific guidelines and procedures. They also recommended that issues such as corruption, abuse of power, as well as roles and responsibilities, needed to be clearly identified and criminalized in the new law. However, in practice it is actually the Police rather than the Social Welfare Department that fulfils the role of identification of victims, and does this mainly through police raids of cabarets and other high risk establishments. However, there are no clear procedures for identification and proving a woman was engaged in prostitution without her consent is almost impossible. Further complicating the issue of identification is that the consent of the victim is irrelevant in cases of trafficking. As the European Council Framework Decision states: “consent of a victim of trafficking in human beings to the exploitation, intended or actual, shall be irrelevant where any of the means (coercion, force or threat, including abduction deceit or fraud, or there is an abuse of authority or of a position of vulnerability, which is such that the person has no real and acceptable alternative but to submit to the abuse involved, or payments or benefits are given or received to achieve the consent of a person having control over another person) have been used”.⁵⁹ A victim of trafficking, threatened and abused by her employer, may never confess that it was not her choice to engage in such activities for fear of further harm.

⁵⁹ European Council Framework Decision of 19 July 2002 on combating trafficking in Human Beings (2002/629/ JHA)
http://europa.eu.int/smartapi/cgi/sga_doc?smartapi!celexapi!prod!CELEXnumdoc&lg=EN&numdoc=32002F0629&model=quichett

All interviewees agreed that a person interviewing a possible victim should be adequately trained to undertake this task – which currently is not the case. They also added that the interviewer should also be of the same gender as the victims. The Attorney General's office also stated that since the police are currently undertaking this responsibility they should be specially trained and should have permanent staff with adequate experience. According to the police, however, the competent office is seriously understaffed. Police officers also felt that the role of identification should be the responsibility of the Social Welfare Department, which is the legal guardian of victims of trafficking. The reason offered for this was that the police are often viewed by the public as corrupt. However, the role of identification should in fact involve all relevant authorities and staff should be trained accordingly to undertake this task, including the Ministry of Health that gives migrant women their medical examination upon their arrival. This is equally true for NGOs whom women often turn to for assistance and support. Thus, both NGOs as well as relevant government departments should be in a position to identify a victim of trafficking.

5. Prosecution

Despite the government's claim to the contrary, MIGS' research and observations indicate that regular police checks as to the living conditions of women working as 'artistes' are rarely carried out. One could say that the police is indeed conducting regular checks on their *employment* conditions and that this is why Cyprus' only recorded numbers of trafficked women available are those collected as a result of police raids and inspections of cabarets, nightclubs and pubs. However, this does not mean that all possible victims cooperate with the police as a result of police raids, as victims are often afraid of deportation and/or may be under the threat of violence by their employers.⁶⁰ According to Politis newspaper (September 14, 2005), after a police raid to a specific nightclub, the police officer arrested the employer and the foreign woman on an 'artiste' visa for a number of offences including prostitution but not trafficking. This case is one of many where possible victims are being arrested "for practicing prostitution". The media usually presents these cases in the frame of "another foreign prostitute has been arrested", without providing for the possibility that the women in

⁶⁰ CEDAW Convention on the Elimination of All Forms of Discrimination against Women, MIGS Shadow report on Cyprus submitted to the CEDAW in March 2006 http://www.medinstgenderstudies.org/wp/wp-content/uploads/cyprus_shadowreport_final3.pdf

question may be acting under the threat of force or other form of coercion, thus enhancing negative stereotypes against these women.

The Police Department “values the intensive checks as best practices, (and they are a major anti-trafficking activity) because since the creation of this office the checks have become more intensive and night club owners have closed down the so called ‘private rooms’.”⁶¹ Of course closing down the so called ‘private rooms’ doesn’t mean that the exploitation of these women is not taking place elsewhere. This is recognized by the police who noted that they are aware that the cabaret owners often move these rooms to a different location and so it is only a matter of time before they discover them.

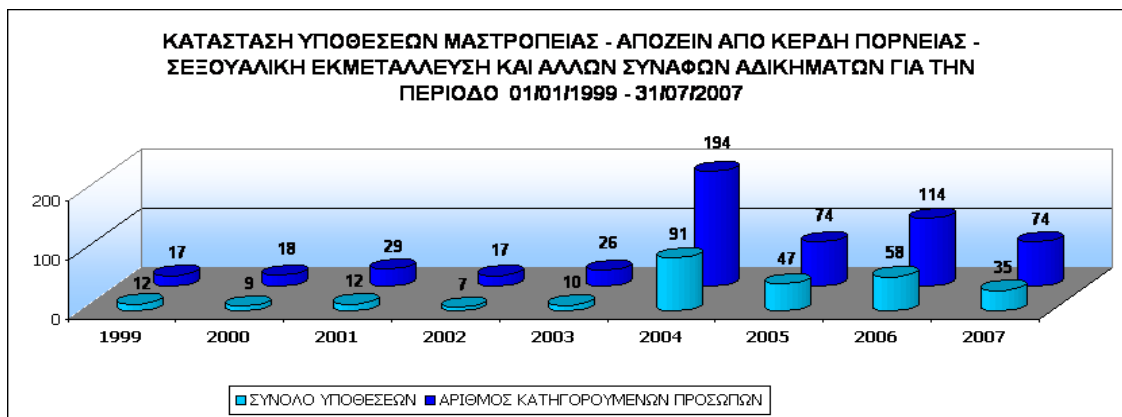
Trafficking cases often remain unreported because the victims fear reprisals by their traffickers and/ or government penalties because of their legal status. Those brave enough to testify against their traffickers may simply find themselves deported as illegal migrants.⁶² This lack of proper reporting and data on trafficking can partly be the result of the low priority placed on fighting trafficking by law officers “due to inadequately implemented legislation for prosecution and victim protection, and the likeliness of the witnesses being deported” (Experts Group on Trafficking in Human Beings, 2004).

The only numbers we have in Cyprus are those collected by the police:

“The figure below indicates the increase of cases that were investigated, or are still under investigation by the Police, for the years 2000 – 2007. It should be noted that for the year 2004, 194 persons were brought to justice, and for the year 2005, 74 persons were brought to justice. The statistical information below relates to the following offences of Sexual Exploitation, Procuring, Living on Earnings of Prostitution, Suppression of Brothels, Procuring Defilement of a Woman by Threats and Indecent Act”.

⁶¹ According to the Police “Private Rooms” are the rooms in a cabaret/ night club where women were sexually exploited

⁶² When ‘artistes’ refuse to succumb to the pressures of their employers to do ‘sex work’, MIGS research shows that they can be forced to go to the District Migrant Office of the Police and declare that they want to leave Cyprus for false reasons. In this manner, the employer succeeds the right to replace that artiste with another.

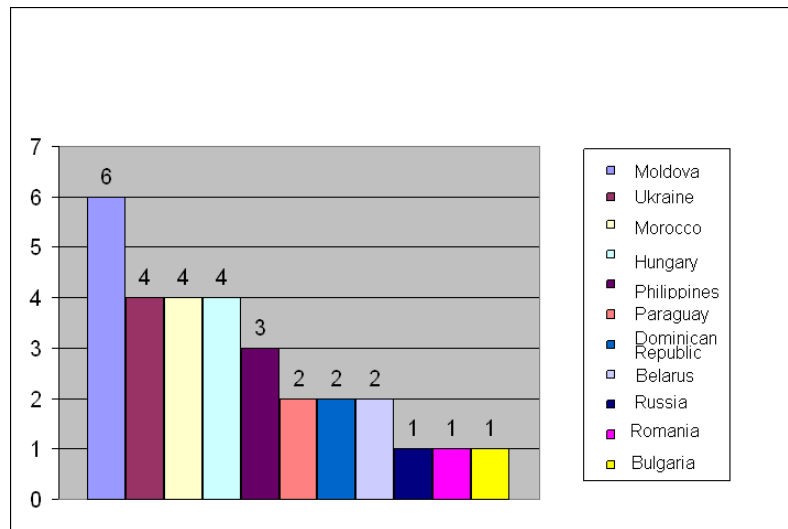


“For the year 2005 the outcome of the 47 cases was as follows:

- 26 cases are pending trial at the Courts
- 6 cases are still under investigation
- 5 cases, persons involved were convicted
- 4 cases, persons involved were acquitted
- 2 cases were otherwise disposed of
- 2 cases were classified as non-existing
- 1 case was filed as nolle-prosequi
- 1 case was dismissed

It should be mentioned that 36 persons were charged with trafficking in persons for sexual exploitation, under the Law 3(I)/2000, while 5 persons were charged with trafficking in persons for sexual exploitation of minors, under the Law 3(I)/2000.

The figure below shows the origin of witnesses/victims of sexual exploitation for the year 2007 [01/01/2007- 31/07/2007].



Still, the above figures fail to clearly demonstrate how many women were actually trafficked for the purpose of sexual exploitation since it only shows the number of women who were willing to testify against traffickers and “employers”. The figure is misleading since it does not include women who were identified as victims but were unwilling to testify.

6. Conclusions and Recommendations

The interviews for this report have highlighted the **need for information, awareness raising, training and on-going updating of all stakeholders**. The Social Welfare Department also suggests that all governmental departments should have clearly outlined responsibilities and be familiar with each other’s responsibilities. Though the coordination of all related authorities and the subsequent drafting of the **Cyprus National Action Plan on trafficking in Human Beings is a positive step forward**, the main problem is that each department faces its own difficulties and problems, the most serious one being the lack of funds, which is also the reason why the implementation of the National Action Plan activities have so far been progressing very slowly. Although the National Action Plan is a step forward, a number of deficiencies have been identified, which need to be addressed, including the issues of identification of victims.

MIGS is highly concerned about the current situation in Cyprus in relation to trafficked women for the purpose of sexual exploitation and stresses that there is no evidence of concrete efforts being made by either the Cyprus government or the civil society in general to address it in a concrete manner.

It is for this reason that MIGS urgently calls for the Cyprus government and respective authorities to:

- Immediately account for the issuing of **'artistes visas'** and proceed with their **abolition**. Any efforts by the Cyprus Government to combat trafficking in women for sexual exploitation are and will be undermined by the existence of such visas;
- Ratify and **implement Council of Europe's Convention on Action against Trafficking**;
- Ensure that in consultation with relevant experts and stakeholders, the Cyprus legislation on trafficking **should be gender specific**
- Respect the **deadlines as set out in the National Action Plan** and adopt a timetable by which the government departments and NGOs involved will implement all the measures assigned to them
- Thoroughly **monitor and evaluate the measures** and strategies of the National Action Plan on Trafficking and ensure that such monitoring is undertaken by an independent organization not party to the National Action Plan;
- Organise and critically re-examine the clear **cooperation among governmental departments** as well as cooperation between **governmental departments and NGOs** and clearly assign responsibilities according to each department's objectives;
- Adopt measures to **cooperate with authorities and NGOs in the countries of origin** with a view to identifying possible cases of trafficking. To that effect,

administrative control officers, embassies and consulates should be adequately trained and informed;

- **Amend anti- trafficking laws** in order to cover a broader definition of “sexual exploitation”. Currently, “sexual exploitation” is limited to exploitation for the purpose of forced prostitution. The definition should be expanded so as to include further acts of sexual exploitation, such as sexually explicit performances, stripping and live shows, which take place in establishments that thrive around the sex industry⁶³;
- Address the issue of **demand** through funded research and targeted awareness-raising activities;
- Constantly update the **list of origin countries** through the use of informed collection of data and research;
- Use the **media** wherever possible in its anti-trafficking activities and ensure that media officials and journalists are trained on gender-awareness and gender-sensitive reporting;
- Organise systematic and **specialised training** using a **gender-sensitive** perspective for all actors involved in human trafficking, including the police and the judiciary system;
- Organise high impact, gender sensitive **awareness-raising campaigns** based on reliable data and ethical research;
- Explore measures to deter and punish the purchaser of sexual services along the lines of the newly adopted Council of Europe Convention on Action against

⁶³ CEDAW Convention on the Elimination of All Forms of Discrimination against Women, MIGS Shadow report on Cyprus submitted to the CEDAW in March 2006 http://www.medinstgenderstudies.org/wp/wp-content/uploads/cyprus_shadowreport_final3.pdf.

Trafficking in Human Beings (Article 19) that criminalizes the buying of services of a victim of trafficking, including sexual services⁶⁴;

- Ensure that the National Action Plan includes measures for the identification of victims by authorities at the borders, during police raids, and by the Welfare Services and the Asylum Unit
- Ensure that the **assistance and protection** offered to trafficked women includes emergency and long term shelter/housing (especially considering the fact that currently the judicial proceedings relating to a case can last for months); long and short term medical and mental health services; easily accessible interpretation services; victim advocacy; free social and legal services; free and accessible information on social and legal rights and obligations;

⁶⁴ CEDAW Convention on the Elimination of All Forms of Discrimination against Women, MIGS Shadow report on Cyprus submitted to the CEDAW in March 2006 http://www.medinstgenderstudies.org/wp/wp-content/uploads/cyprus_shadowreport_final3.pdf. The UN Protocol on Trafficking (article 915) calls upon states to discourage demand that fosters exploitation and leads to trafficking. The European Parliament is also promoting measures criminalizing the demand for sexual services in the cases of coercion into prostitution

Bibliography

- Anderson, B. and O'Connell-Davidson, 2003, "Is Trafficking in Human Beings Demand Driven? A Multi-Country Pilot Study", International Organization for Migration (IOM), *IOM Migration Research Series*, No 15, Switzerland.
- Anti-Slavery International, 2003, "The Migration-Trafficking Nexus: Combating trafficking through the protection of migrants' human rights", UK: *Anti-Slavery International*. <http://www.antislaveryinternational.org>
- Brussels, 22 December 2004, Report of Experts Group on Trafficking in Human Beings, European Commission, Directorate- General Justice, Freedom and Security
- Brussels Declaration on Preventing and Combating Trafficking in Human Beings http://www.coe.int/t/dg2/trafficking/campaign/Docs/OrOrg/Bruxdoc_en.pdf
- CEDAW Committee, 35th Session <http://www.un.org/womenwatch/daw/cedaw/35sess.htm>
- Civil Registry Migration Department http://www.moi.gov.cy/MOI/CitizensCharter/CitizensCharter.nsf/dmlwork_en/dmlwork_en?OpenDocument#3
- Council of Europe Convention on Action against Trafficking in Human Beings (CETS N° 197) adopted by the Committee of Ministers on 3 May http://www.coe.int/T/E/human_rights/trafficking/PDF_Conv_197_Trafficking_E.pdf
- Council of Europe, 2000, "Trafficking in Human Beings: Compilation of the Main Legal Instruments and Analytical Reports Dealing with Trafficking in Human Beings at International, Regional and National Levels", *Council of Europe*, EG 2(2).
- Council of Europe Treaty Series, 2005, "Council of Europe Convention on Action against Trafficking in Human Beings and its Explanatory Report", Treaty Series – No.197, Warsaw, *Council of Europe*.
- Council of Europe, 1996, "Plan of Action Against Traffic in Women and Forced Prostitution", *Council of Europe*, EG 2(96).
- Council of Europe, 2000, "Trafficking in Human Beings: Compilation of the Main Legal Instruments and Analytical Reports Dealing with Trafficking in Human Beings at International, Regional and National Levels", *Council of Europe*, EG 2(2).
- Council of Europe Treaty Series, 2005, "Council of Europe Convention on Action against Trafficking in Human Beings and its Explanatory Report", Treaty Series – No.197, Warsaw, *Council of Europe*.

- Council Framework Decision of 19 July 2002 on combating trafficking in human beings (2002/629/JHA)
http://eurx.europa.eu/LexUriServ/site/en/oj/2002/l_203/l_20320020801en00010004.pdf
- Cyprus, 2000, "Combating of Trafficking on Persons and Sexual Exploitation of Children Law".
<http://www.legislationline.org/legislation.php?tid=195&lid=2442>
- Cyprus Commissioner for Administration (Ombudsman's office), 2003, "The Entry and Labor Status of Migrant Artists Women", *Commissioner for Administration*, Cyprus.
- Decision of the Ministerial Committee in 2005 with regards to the services related to migrant workers. Information could be found at
[http://www.police.gov.cy/police/police.nsf/All/A04666619809BC43C22571DF00368145/\\$file/Xartis%20Dikaionaton%20tou%20Politi%20A5%20Web.pdf?OpenElement](http://www.police.gov.cy/police/police.nsf/All/A04666619809BC43C22571DF00368145/$file/Xartis%20Dikaionaton%20tou%20Politi%20A5%20Web.pdf?OpenElement)
- EC, December 2004, "Report of the Experts Group on Trafficking in Human Beings", Directorate-General Justice, Freedom and Security, Brussels, *European Commission*.
- European Council Framework Decision OF 19 July 2002 on combating trafficking in human beings (2002/ 629/JHA)
http://europa.eu.int/smartapi/cgi/sga_doc?smartapi!celexapi!prod!CELEXnumdoc&lg=EN&numdoc=32002F0629&model=guichett
- European Commission, Justice and Home Affairs: A Comprehensive European Strategy Trafficking in Women: The misery behind the fantasy- from poverty to sex slavery available at http://ec.europa.eu/justice_home/news/8mars_en.htm
- European Parliament resolution on strategies to prevent the trafficking of women and children who are vulnerable to sexual exploitation (2004/2216(INI))
- Hughes, D. M., August 2004, "Best Practices to Address the Demand Side of Sex Trafficking".
http://www.uri.edu/artsci/wms/hughes/demand_sex_trafficking.pdf
- Hughes, D. M., June 2005, "The Demand for Victims of Sex Trafficking".
http://www.uri.edu/artsci/wms/hughes/demand_for_victims.pdf
- Hughes, D. M. and Denisova, T., 2002, "Trafficking in Women from Ukraine", U.S.-Ukraine Research Partnership
http://www.uri.edu/artsci/wms/hughes/ukraine_report.pdf
- International Labour Organization (ILO), 2003, "Forced Labour Outcomes of Irregular Migration and Human Trafficking in Europe", *ILO: Geneva*.

- International Labour Organization (ILO), 2003, "Trafficking in Human Beings: New Approaches to Combating the Problem", *ILO-MIGRANT*: Geneva.
- International Organization for Migration (IOM), 2004, "Trafficking in Persons: An Analysis of Afghanistan", *IOM*: Geneva, 262 Kelly.
- International Organization for Migration (IOM)/International Catholic Migration Commission (ICMC), 2002, "Research Report on Third Country National Trafficking Victims in Albania", *IOM*: Tirana.
- International Organization for Migration (IOM), 1995, "Trafficking and Prostitution: The Growing Exploitation of Migrant Women from Central and Eastern Europe", Migration Information Programme, *IOM*: Geneva.
- International Organization for Migration (IOM), 1998, "Information Campaign Against Trafficking in Women from Ukraine", *IOM*: Geneva.
- International Organization for Migration (IOM), 2000, "Perspectives on Trafficking of Migrants", *IOM*: Geneva, and *United Nations*, Offprint of International Migration.
- Plan of Action For the Coordination of Actions on Combating Trafficking in Human Beings and Sexual Exploitation of Children, Cyprus, April 2005
- Stefanos Evripidou, 'Theodorou Refuses to Back Down over Eastern European Prostitution Claim', Cyprus Mail (Nicosia), 5 December 2003, p 3
- Trafficking Victims Protection Act (2000)
<http://www.state.gov/g/tip/rls/tiprpt/2004/33192.htm#cyprus>
- The Convention on the Elimination of All forms of Discrimination against women [The CEDAW Convention – Shadow Report prepared by the Mediterranean Institute of Gender Studies
http://www.medinstgenderstudies.org/wp/?attachment_id=91
- The Convention on the Elimination of all Forms of Discrimination against Women (the CEDAW Convention <http://www.un.org/womenwatch/daw/cedaw/35sess.htm>
- The Gender and Media Handbook, published by the Mediterranean Institute of Gender Studies, 2004 <http://www.medinstgenderstudies.org/wp/?p=22>
- The State of the World's Refugees 2006 - Chapter 1 Current dynamics of displacement: Box 1.3 Protection for victims of trafficking
<http://www.unhcr.org/cgi-bin/texis/vtx/publ/opendoc.htm?tbl=PUBL&id=4444d3c119>
- The Mekong Challenge Human Trafficking: Redefining Demand” by the International Labor Organization, 2005

<http://www.ilo.org/public/english/region/asro/bangkok/child/trafficking/downloads/demand.pdf>

- The United Nations Convention against Transnational Organized Crime and its Protocols (2000) http://www.unodc.org/unodc/crime_cicp_convention.html
- "Trafficking in Women: Yes to responsibility- No to Tolerance" Awareness raising leaflet available at http://www.medinstgenderstudies.org/Downloads/traffickingLeaflet_en.pdf, http://www.medinstgenderstudies.org/Downloads/traffickingposter_en_A4_1.pdf
- Ukrainian police arrest sex trade gang," *Newsline* Vol. 3, No. 54, Part II (Prague, Czech Republic: Radio Free Europe/Radio Liberty, 18 March 1999). Regional Security Office, U.S. Embassy, Kyiv, Ukraine,
- *Crime Digest*, March 1999, <http://www.usemb.kiev.ua/rso/CrimeDigest9903.html>
- US State Department, 2005, "Trafficking in Persons Report", Washington D.C.: *US State Dept* <http://www.state.gov/g/tip/rls/tiprpt/2005/46613.htm>
- US State Department, 2006, "Trafficking in Persons Report", Washington D.C.: *US State Dept.* <http://www.state.gov/documents/organization/66086.pdf>
- US State Department, 2007, "Trafficking in Persosns Report", Washington D.C.: *US State Dept.* <http://www.state.gov/g/tip/rls/tiprpt/2007/82805.htm>
- UN, "Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime", Adopted and opened for signature, ratification and accession by General Assembly resolution 55/25 of 15 November 2000 (not in force). <http://www.ohchr.org/english/law/pdf/protocoltraffice.pdf>
- UN, "United Nations Convention Against Transnational Organized Crime". http://www.unodc.org/pdf/crime/a_res_55/res5525e.pdf
- Vassiliadou, Myria 'Women's Constructions of Women; On Entering the Front Door', *Journal of International Women's Studies*, Special Issue: Feminist Challenges: Crossing Boundaries, Vol. 5, #3, May 2004 Also available at : <http://www.bridgew.edu/SoAS//jiws/May04/index.htm>

ANNEX A

Conventions ratified by the Republic of Cyprus Government

(a) United Nations Convention against Transnational Organised Crime, and its Protocols, ratified by Law 11(III)/2003.

(b) European Convention on Mutual Assistance in Criminal Matters and its Protocols, ratified by Law 2(III)/2000.

(c) Agreement between the European Communities Member States for Communication of Criminal Proceeding ratified by Law 20(III)/2003.

(d) European Communities Member States Convention on the Execution of Criminal Conviction Decision made in another Member State, ratified by Law 21(II)/2003.

(e) European Convention on the Compensation of Victims of Violent Crimes, ratified by Law 2(II)/97.

(f) United Nations Convention on the Elimination of All Forms of Discrimination against Women, ratified by Law 78/85 and the optional Protocol of the Convention, ratified by Law 1(III)/2002.

(g) Convention on the Suppression of the Traffic in Persons and the Exploitation of the Prostitution of Others, of 1949.

(h) The Convention on the Rights of the Child, ratified by Laws 243/90 and 5(III)/2000.

(i) European Council Convention on Prevention of Corruption ratified by Law 23(III)/2000.

(j) Convention on the Protection of the European Communities Financial Interests and its Protocols, ratified by Law 37(III)/2003.

(k) Convention against Bribery involving officials of the European Communities or officials of Member States of the European Union, ratified by Law 2(III)/2002.

(l) Civil Law Convention on Corruption ratified by Law 7(III)/2004.

(m) European Council Convention against Cybercrime ratified by Law 22(III)/2004.

(n) Additional Protocol to the Convention against Cybercrime to approximate criminal law on child pornography on the Internet, racism and xenophobia and attacks against information systems, ratified by Law 26(III)/2004.

ANNEX B

Group of Experts who drafted the National Action Plan

- 1. Law Office**
- 2. Police**
- 3. Ministry of Justice and Social Order**
- 4. Ministry of Exterior**
- 5. Ministry of Labour and Social Security [Social Welfare Department]**
- 6. Ministry of Interior**
- 7. Family Planning Association**
- 8. Pancyprian Welfare Council**
- 9. Action for Support Equality and Antiracism**
- 10. Association for the Prevention and Handling of Domestic Violence**
- 11. International Association for the Protection of Human Rights**

ANNEX C

The following governmental departments and NGOs participated in the research

Governmental Departments

1. Law Office

Address: Appeli 1456 Nicosia

Type of Organization: Governmental

Number of people working for the law office: Attorney General, 58 lawyers, and 20 other employees who deal with matters pertaining to the European Union

Number of people working on the issue of Trafficking: 3 expert lawyers

Main activities of the law office: The Attorney General deals with legislation and criminal offences

Main activities with regard to trafficking issues: the office is working on the issue of trafficking since 2001. The main activities of the office include the formation of an expert group and the passing of an Action plan.

Specific guidelines/policies followed for trafficking issues: Law related

Services provided: cases involving the sexual exploitation of women were directed to a lawyer.

Prevention measures taken to combat trafficking: currently waiting for the new legislation in relation to the combating of trafficking in human beings, to be put into action. The law office has contributed to the drafting of this legislation.

Main problems faced with when dealing with prosecution in trafficking matters: the greatest problem faced is usually victims' reluctance to testify.

2. Ministry of Interior

Address: Ministry of Interior, 1453 Nicosia

Type of Organization: Governmental

Number of people working on the issue of Trafficking: 3 people since 2003

Main activities of the ministry: Immigration, urban planning, political defence, Turkish-Cypriot properties.

Main activities with regard to trafficking issues: general coordination of other services, immigrants' issues (permits, renewals) including dealing with victims who wish to cooperate with the police.

Specific guidelines/policies followed for trafficking issues: The ministry does not deal with the victims directly. It follows the NAP which was decided by the ministry's committee.

Services provided: Essentially, the Ministry provides immigrants with their permits; it doesn't deal with victims of trafficking

Prevention measures taken to combat trafficking: Publication and dissemination of informative leaflets and posters for possible victims, organization of a seminar in collaboration with the European Council in February 2007

3. Police

Address: Chief of Police Department, Sector C

Type of Organization: Governmental

Number of people working on the issue of Trafficking: This office was created in April 2004 and the people working on the issue are 3.

Main activities with regard to trafficking issues: coordination with regards to issues such as child pornography as well as trafficking in persons, collection, evaluation and transmission of information, organization of police operations

Specific guidelines/policies followed for trafficking issues: as stated under the recent Action Plan

Services provided: Support, information, legal advice, health services, residence, and legal interventions.

Prevention measures taken to combat trafficking: undertaking of operations for the combating of trafficking.

Main problems faced with when dealing with prosecution in trafficking matters: Staff shortage

4. Social Welfare Department

Address: Prodromou 63, 1468, Nicosia

Type of organization: Governmental

Number of people working for the organization: 60-70 people

Number of people working on the issue of trafficking: 2 persons, since 2004

Main activities of the Social Welfare Department: Divided in terms of services, as for example, “family and children”, “social work”, “aid for disabled persons” and “education” etc.

Main activities with regards to trafficking: provides safe residence and medical aid with supervision to victims, establishes the right of victims to have access to the authorities with regard to their cases, focuses on the issue of the victims’ exploitation and the help that should be rightfully granted to them in order to attempt to relieve them from their traumatic experiences.

Specific guidelines/policies followed for trafficking issues: in terms of social welfare services, social workers are given the opportunity to discuss this complicated matter of sexual exploitation and through this gain knowledge and expertise in handling such cases. In addition, the social workers have gone to Italy, through a European Programme, where they obtained training on trafficking in women for a week.

Services provided: Support, information, legal advice, health services, residence, and legal interventions.

Prevention measures taken to combat trafficking: no specific measures

Non- Governmental Organisations

1. Action for Support Equality and Anti-Racism (KISA)

Address: Arsinois 48, Nicosia

Type of Organization: NGO

Functioning since: 1998

Number of people working for the organization: 3 people and many volunteers

Number of people working on the issue of Trafficking: depending on the case

Main activities of KISA: offers legal, social advice to immigrants, refugees and trafficking victims.

Main activities with regard to trafficking issues: KISA is working on the issue of trafficking in people from 1999 in the context of immigration and more specifically with trafficking in women for the purpose of sexual exploitation from 2000/2001. There is no specific programme to deal with cases pertaining to trafficking. The organization has gained experience however, through the cases and the legal aspect.

Specific guidelines/policies followed for trafficking issues: None, although the organization has studied a lot of publications of the European Commission amongst others.

Services provided: support in relation to the victims' rights, information, legal advice, health services, residence, and legal interventions

Prevention measures taken to combat trafficking: No measures taken for combating trafficking. Measures for the protection of trafficked victims taken are as follows: establishing their rights by providing services and information in an effort to influence the authorities of labour, immigration, police etc. In two specific cases KISA also tried to find shelter for victims of trafficking who had nowhere to stay.

Main problems faced with when dealing with prosecution in trafficking matters: financial problems due to NGO status

2. Association for the Prevention and Handling of Domestic Violence:

Type of Organization: NGO

Functioning since: 2000 and on the issue of trafficking since 2002

Number of people working on the issue of Trafficking: One

Main activities of the Association: provision of a helpline 1440 which allows for advice with regards to all kinds of violence, and arrangement of appointments with NGO members; a main programme which provides shelter for persons; seminars lectures and day fairs organized at schools, colleges, the police academy etc; fund raising.

Main activities with regard to trafficking issues: are peripheral as they deal primarily with families rather than trafficked individuals

Specific guidelines/policies followed for trafficking issues: none at the moment, but in the process of creating protocols for the adoption of specific measures and practices in dealing with trafficking.

Services provided: Social and psychological support; seeking legal information through lawyers and shelter

Prevention measures taken to combat trafficking participation in prevention and support forums

Main problems faced with when dealing with prosecution in trafficking matters: the reluctance of the victims to come forward

3. Family Planning Association

Address: Boumboulinas, 25 10601, Nicosia

Number of people working for the organization: 4 staff persons and 300 volunteers

Number of people working on the issue of trafficking: employees work on these issues on a project basis.

Type of organization: NGO, voluntary

Functioning since 1971

Time period of Organization's dealing with issues of trafficking: 15 years

Main activities of the Association: the promotion of sexual and reproductive health, the guarantee of sexual rights and reproduction for all people, and protection from abuse.

Main activities with regards to trafficking: For the past 10 years the organization runs a programme entitled "Age Education for Foreign Artists" which provides for the opportunity to discuss the issues of HIV/AIDS, sexually transmitted diseases, contraception etc. In addition, certain useful contact numbers are given out, and questionnaires are filled in order to better assess the situation at hand.

Specific guidelines/policies followed for trafficking issues: this issue is currently being examined

Services provided: Support, information, legal advice, health services, residence, and legal interventions

Prevention measures taken to combat trafficking: providing information on sexual reproductive rights, gender equality and women's empowerment, whether Cypriot or foreign, especially when in positions of vulnerability. In terms of protection of the victims, the organization carries no specific role.

Main problems faced in dealing with prosecution in trafficking matters: Due to NGO status, financial and sustainability status.

ANNEX D Informative leaflet published by the Ministry of Interior



REPUBLIC OF CYPRUS

A large, stylized line drawing of a woman's face, looking slightly to the right, set within a circular frame. The drawing is composed of simple, bold lines.

**Informative leaflet
for women, nationals
of third countries,
who enter the Republic
of Cyprus
for employment
as artistes
in entertainment places
(cabarets)**

Civil Registry and
Migration Department
Ministry of Interior

2006

1. The alien woman is allowed entry into the Republic provided that at the point of entry the employer/artistic agent produces the original entry permit which is issued by the Civil Registry and Migration Department.
2. After her arrival in the Republic the alien:
 - will undergo medical tests at the Makarios Hospital
 - will sign the employment contract at the District Aliens and Immigration Department of the Police of the district where she will work and will receive its copy
 - will present (through the artistic agent) her passport to the Civil Registry and Migration Department for the granting of a residence/work permit for 3 months with the affixing of a seal on it, together with:
 - *an employment contract stamped by the Duty Stamps Registrar*
 - *the results of the medical tests*
 - *medical insurance*
 - *certificate from the Inland Revenue Department regarding her income tax*
 - will present herself together with her employer or her artistic agent within 7 days at the Branch District Aliens and Immigration Department of the Police of the district where she will work, for her registration and the receipt of an Aliens Registration Certificate (ARC), by submitting:
 - *her passport*
 - *4 photographs*
 - *photocopy of the entry permit*
 - *a declaration by her whether she has worked in the Republic before*
 - *a fee of 20 Cyprus Pounds.*
3. It is clarified that:
 - *the alien pays only the registration fee of 20CYP*
 - *the artistic agent pays the fee for the entry permit (CYP20), the extension of the residence permit (CYP20) and the expenses of the medical tests, and*
 - *the employer pays for the airline ticket, the income tax, social insurance and medical insurance.*
4. The temporary residence/work permit may be extended for a further three months upon the submission:
 - *of a completed M61 form signed by the alien*
 - *the original employment contract stamped by the Duty Stamps Registrar*
 - *new medical tests*

- *medical insurance*
- *copy of her passport*
- *identification of alien (ARC)*
- *bank deposit booklet*
- *income tax and social insurance payment receipts*
- *one photograph*
- *a fee of 20CYP.*

Both the alien and her employer should be present at the submission of the above documents in order to sign the employment contract in the presence of the Officer of the District Aliens and Immigration Department of the Police.

5. After the lapse of the six month period of work, the alien may return to the Republic for employment in the same job 6 months after her departure, and the same is repeated until she completes the maximum period of residence/work allowed for aliens, nationals of third countries.
6. The alien is obliged to always carry with her, her identification (ARC), her passport and the temporary residence licence (pink slip) and to produce them on the following occasions:
 - a) *for police check*
 - b) *for renewal of her residence and work permit, and*
 - c) *for change of her place of residence and work*
7. Both the employer and the employee will comply strictly with the conditions of the employment contract and will have a copy of the employment contract in their possession.
8. The employer is obliged to open a Bank Account in the name of the alien and to deposit in it her salary every month. The deposits booklet should be in the possession of the alien.
9. The employer does not have the right to deduct from the salary of the employee the value of the ticket, fees he paid to his agent or any other expenses he incurred for her arrival and employment in the Republic.
10. In case the alien interrupts the employment contract she has to pay part of the ticket for her repatriation unless the reasons for the interruption of the contract are due to violation of the terms of employment by the employer.
11. On the basis of the employment contract the alien has to be at the place of her

work from 21:00 until 03:00 hours and is entitled to one day's leave from work per week about which she will be informed by her employer in advance. In case of absence due to illness a medical certificate should be produced.

12. The employer has no right:
 - *to impose fines on the alien or to terminate her employment without reason and without informing the Aliens and Migration Department of the Police*
 - *to keep her under confinement during non-working hours*
 - *to retain her passport or other personal effects*
 - *to force her to accompany customers within or outside the entertainment place*
 - *to send her for work to another employer.*
13. The employer commits a criminal offence if he forces her to prostitution or if he exploits her sexually or in any other manner.
14. In case the alien whose conditions of employment are violated or who is an object of sexual or other exploitation or is promoted to prostitution by her employer or by any other person, wishes to escape from the exploitation ring, after submitting a complaint to the Population and Migration Department, she is granted extension of her residence permit in Cyprus and a right to change her employer and/or job, if she is willing to cooperate with the authorities for the criminal prosecution of her employer and/or any other person who is responsible.
15. During their residence in Cyprus the victims of exploitation are entitled to protection and support including arrangements for financial and psychological support and also have the right to a change of the category of their employment by the Civil Registry and Migration Department.
16. The victims of exploitation also have the right to file an action against their employer and/or any other person who exploits them, with the Courts of Cyprus and ask for compensation due to violation of their rights.
17. The alien who promotes herself to prostitution of her own will, without being forced to do so, violates the conditions of her work and consequently the conditions of her residence permit in the Republic and is liable to deportation.
18. For the protection of aliens from exploitation, the institution of custodian of exploitation victims has been introduced. The custodian of exploitation victims is the Director of the Social Welfare Services. The custodian of exploitation victims in cooperation with other Services and Departments has the following functions:
 - *to advise and guide victims of exploitation*
 - *to hear their complaints and to take all measures for their full investigation by the competent organs*

- *to arrange through the state services for their medical treatment and safe residence*
 - *to promote through the competent authorities the persecution of the persons who have engaged in acts of exploitation or other actions which constitute violation of the Law*
 - *to take all measures in order to support their rehabilitation, employment and repatriation.*
19. In case the employer or any other person violates the above conditions and prerequisites of work or promotes the alien to prostitution or exploits her sexually or in any other manner, the alien may denounce the employer or any other person to the Police to the Office of Combating Trafficking in Human Beings of the Police, or to the Welfare Department or apply for help and guidance to the non-governmental organisations mentioned below.
20. For more information and resolution of problems aliens may immediately contact:
- the headquarters of the Social Welfare Services
Prodromou 63, 2063, Strovolos Nicosia.
Telephone: 22406655,22406656
Fax: 22667907
 - the Welfare District Office of Nicosia
Agiou Ilarionos 66, Kaimakli 1025 Nicosia
Telephone: 22804608
Fax: 22804666
 - The District Welfare Office of Limassol
Franklin Roosevelt 80, 3011 Limassol
POB 56053
Telephone: 25804450
Fax: 25306576
 - The District Welfare Office of Larnaka
Peliou 23-25, 6037 Larnaka
POB 40184
Telephone: 24800101
Fax: 24304876

- The District Welfare Office of Paphos
Kinyra and Aristoteli Valaoriti 28, 8100 Paphos
Telephone: 26306402
Fax: 26306162
- the District Welfare Office of Famagusta
1st April 170, 5310 Paralimni
Telephones: 23811720, 23811728
Fax: 23827698
- the Aliens and Immigration Department of the Police,
telephones:
22802345 Nicosia,
25805229-25805230 Limassol,
24804242 Larnaka,
26806212 Paphos
- Office of Combating Trafficking in Human Beings of the Police
telephones: 22808917, 22808919, 1460 (Hot-line), fax: 22305142
- the Ombudsman Gladstone 6, 1095 Nicosia, telephone: 22456300
- the Cyprus Gender Equality Observatory -Kanari 7, Strovolos,
telephones: 77772070 or 22441899
- KISA-Movement for Equality, Support, Anti-racism-DeIphon 5 and
Ionon 31, Nicosia, telephones: 22878181, fax:22773039
- APANEMI POB:27452, 1645 Nicosia, telephones; 8000-1999, 25817306, 22751761,
fax: 22346236, 25817307



ANNEX E 'Artiste' Contract

CONTRACT

We the undersigned:

1.
.....
Manager of Night Club/Cabaret

2.
.....
Artist Agent

3. See names below
.....
Artist(s)

Agree and accept the following:
1. The artist(s) will be employed solely with the
Cabaret/Night Club at..... and will not be employed
or perform in any other cabaret/night club in Cyprus under any
circumstances during the period of validity of this contract. The
artist(s) will participate in all the floor shows of the above cabaret/
night club and will stay in the cabaret/night club during its working
hours i.e. from 9.30 p.m. to 4.00 a.m.

2. The artist(s) is/are allowed one day off every week. In case of
sickness he/she/they should obtain a certificate from a **government
medical officer** at the beginning of the sickness period.

3. The contracting parties i.e. the manager of the cabaret/night club,
the artist agent and the artist(s) agree on the following with respect
to the daily wages of the artist(s):

(a) Gross daily wages for each artist	£ 16.00 - GROSS
(b) Deductions:	
1. (i) Income Tax	£ 1.60 - DAILY
(ii) Accommodation	£ 1.40 - DAILY
(iii) Ticket fares to and from Cyprus	£ 1.50 - DAILY
(iv) Artist Agent commission	£ 1.50 - DAILY
(c) Artist(s) net daily wages	£ 10.00 - DAILY
Total (B+C=A)	£ 16.00

4. The net daily wages of each artist, quoted above, should be paid
to him/her every working day at the time of closing of the cabaret/
night club. Any delay in the payment of these wages should be
reported by the artists in person and without delay to the Aliens and
immigration unit of the police in their district of residence and
employment.

5. This contract is valid for three months but the contracting parties
may, if they so wish, amend its validity at the end of the first month
and/or at the end of the second month of its validity.

6. The contracting parties have signed this contract after reading
carefully the conditions referred there in which they fully accept.

Made in Limassol.....

Director..... The Agent.....

ESTABLISHMENT

DEBUT

FIVE DAYS AFTER ARRIVAL

DURATION

THREE MONTHS

APPOINTMENTS

£ 16.00 DAILY Gross

VOYAGES

SPECIAL CONDITIONS

Verified, that the artist
signed, in my presence

IDENTITIES



Artist(s).....