

## **Albanian trafficked boys and young men: an addendum review of the February 2023 CPIN**

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1. In January 2023 I published a review of the December 2022 Home Office Country Policy and Information Note (CPIN) on human trafficking in Albania.<sup>1</sup> In that review, I argued that the December 2022 CPIN was wrong to argue that asylum claims by Albanian boys and men based on human trafficking can be certified as clearly unfounded.
2. In that review, I highlighted that certification under section 94 is a draconian measure which deprives the claimant of an in-country right of appeal, leaving judicial review as their only remedy. A claim being “clearly unfounded” means “so clearly without substance that it was bound to fail”, *Thangarasa and Yogathas* [2002] UKHL 36. If any reasonable doubt exists as to whether the claim may succeed then it is not clearly unfounded, *ZT (Kosovo)* [2009] UKHL 6. In view of this, where a protection claim is certified as clearly unfounded, the certification normally is not based upon issues of credibility, unless the claim is so incredible that no one could believe it: see *ZL and VL* [2003] EWCA Civ 25. Rather, the decision to certify the claim is normally taken on the basis that, taking the claimant’s account at its highest, the claimant does not have a well-founded fear of persecution and is not at risk of serious harm, would be able to receive sufficient protection from the authorities of their home country, and/or could safely and reasonably relocate internally within their home country to avoid the risk.
3. I highlighted that the starting point for evaluating risks of re-trafficking is the case of *TD and AD (Trafficked women) CG* [2016] UKUT 92 (IAC) which gives the following Country Guidance:

*“a) It is not possible to set out a typical profile of trafficked women from Albania: trafficked women come from all areas of the country and from varied social backgrounds.*

*b) Much of Albanian society is governed by a strict code of honour which not only means that trafficked women would have very considerable difficulty in*

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<sup>1</sup> David Neale, “Albanian trafficked boys and young men: a review of the December 2022 CPIN,” 31 January 2023 <https://miclu.org/assets/uploads/2023/01/Albania-trafficking-CPIN-response.pdf>

*reintegrating into their home areas on return but also will affect their ability to relocate internally. Those who have children outside marriage are particularly vulnerable. In extreme cases the close relatives of the trafficked woman may refuse to have the trafficked woman's child return with her and could force her to abandon the child.*

*c) Some women are lured to leave Albania with false promises of relationships or work. Others may seek out traffickers in order to facilitate their departure from Albania and their establishment in prostitution abroad. Although such women cannot be said to have left Albania against their will, where they have fallen under the control of traffickers for the purpose of exploitation there is likely to be considerable violence within the relationships and a lack of freedom: such women are victims of trafficking.*

*d) In the past few years the Albanian government has made significant efforts to improve its response to trafficking. This includes widening the scope of legislation, publishing the Standard Operating Procedures, implementing an effective National Referral Mechanism, appointing a new Anti-trafficking Co-ordinator, and providing training to law enforcement officials. There is in general a Horvath-standard sufficiency of protection, but it will not be effective in every case. When considering whether or not there is a sufficiency of protection for a victim of trafficking her particular circumstances must be considered.*

*e) There is now in place a reception and reintegration programme for victims of trafficking. Returning victims of trafficking are able to stay in a shelter on arrival, and in 'heavy cases' may be able to stay there for up to 2 years. During this initial period after return victims of trafficking are supported and protected. Unless the individual has particular vulnerabilities such as physical or mental health issues, this option cannot generally be said to be unreasonable; whether it is must be determined on a case by case basis.*

*f) Once asked to leave the shelter a victim of trafficking can live on her own. In doing so she will face significant challenges including, but not limited to, stigma, isolation, financial hardship and uncertainty, a sense of physical insecurity and the subjective fear of being found either by their families or former traffickers. Some women will have the capacity to negotiate these challenges without undue hardship. There will however be victims of trafficking with characteristics, such as mental illness or psychological scarring, for whom living alone in these circumstances would not be reasonable. Whether a*

*particular appellant falls into that category will call for a careful assessment of all the circumstances.*

*g) Re-trafficking is a reality. Whether that risk exists for an individual claimant will turn in part on the factors that led to the initial trafficking, and on her personal circumstances, including her background, age, and her willingness and ability to seek help from the authorities. For a proportion of victims of trafficking, their situations may mean that they are especially vulnerable to re-trafficking, or being forced into other exploitative situations.*

*h) Trafficked women from Albania may well be members of a particular social group on that account alone. Whether they are at risk of persecution on account of such membership and whether they will be able to access sufficiency of protection from the authorities will depend upon their individual circumstances including but not limited to the following:*

- 1) The social status and economic standing of her family*
- 2) The level of education of the victim of trafficking or her family*
- 3) The victim of trafficking's state of health, particularly her mental health*
- 4) The presence of an illegitimate child*
- 5) The area of origin*
- 6) Age*
- 7) What support network will be available."*

4. *TD and AD is concerned with trafficked girls and women. However, a 2019 report by Asylos and Asylum Research Centre found that similar risk factors applied to men and boys. That report found that the risk factors for men and boys included poverty, low education, suffering from physical or mental disabilities, domestic violence and/or sexual abuse within the family or a pre-existing blood feud, being LGBT and for children, being Roma or Egyptian or homeless.<sup>2</sup> Criminal groups "identify the most vulnerable boys those that have no family support - those that are in immediate need to make some sort of living".<sup>3</sup>*

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<sup>2</sup> Asylos and Asylum Research Centre, "Albania: Trafficked boys and young men," May 2019, pp 16-26  
<https://www.asylos.eu/Handlers/Download.ashx?IDMF=b49e66a6-a777-47da-90f7-b2fcc14946fa>

<sup>3</sup> *Ibid.*, p 36.

5. The centrepiece of the December 2022 CPIN was a new Home Office Fact Finding Mission (FFM) report.<sup>4</sup> On analysis, however, the FFM report did not justify the Home Office's conclusions, but indeed provided further support for the conclusions in the Asylos/ARC report. Terre des Hommes told the FFM team that *"At present domestic violence (DV) is one of the most vulnerable situations associated with trafficking. Also if people have disabilities in the family, alcohol, mental health (MH) issues or physical issues. The economic situation is an issue too. Plus dysfunctional families (violent) and single headed households, and children who have dropped out of school. Not everyone that has these vulnerabilities are at risk, but if they have two or more, then yes."*<sup>5</sup> Mary Ward Loreto Foundation similarly told the FFM team *"Albania is safe to live in if you are not vulnerable. If you are vulnerable and poor you are not safe..."*<sup>6</sup> This provides further support for the contention that those trafficked men and boys who display the TD and AD risk factors are at risk of re-trafficking.
6. In my review of the December 2022 CPIN, I challenged various claims in the CPIN, and argued that claims by trafficked boys and men should not be certified. Readers of this review are invited also to read my review of the December 2022 CPIN in full.
7. In February 2023, the Home Office published a new CPIN, which, like the December 2022 CPIN, argues that claims by trafficked boys and men are certifiable.<sup>7</sup> That conclusion remains wrong. In this short addendum paper, I review the further information provided in the February 2023 CPIN, and explain why it does not justify a departure from the conclusions I reached in my review of the December 2022 CPIN. Much of the evidence in the two CPINs is the same. Therefore, this paper is an addendum to my review of the December 2022 CPIN, and should be read together with it.

### **Support for victims**

8. Although the February 2023 CPIN mostly relies on the same sources as the December 2022 CPIN, it does contain a new source, namely a letter from the British Embassy Tirana with a number of enclosures, which is at Annex A to the CPIN. This letter addresses the support available in Albania for victims of trafficking. Its enclosures include responses from various Albanian NGOs about the support they are able to provide to victims.

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<sup>4</sup> Home Office, "Report of a fact-finding mission: Albania: Human trafficking," December 2022 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1123466/ALB\\_FFM\\_report\\_on\\_human\\_trafficking.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1123466/ALB_FFM_report_on_human_trafficking.pdf)

<sup>5</sup> Home Office FFM report, p 91.

<sup>6</sup> Ibid., p 95.

<sup>7</sup> Home Office Country Policy and Information Note, "Albania: Human trafficking," version 13.0, February 2023 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1133771/ALB\\_CPIN\\_Human\\_trafficking.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1133771/ALB_CPIN_Human_trafficking.pdf)

9. The British Embassy letter makes extensive reference to the existing UNICEF programme, Transforming National Response to Human Trafficking in and from Albania, that has been funded by the UK Government since 2019.
10. Although the British Embassy letter is new, UNICEF and its implementing partners were interviewed for the FFM report and were featured in the previous CPIN. According to the UNICEF programme's website, the only four partners which provide assistance, support and reintegration to potential victims and victims of trafficking are Vatra Psycho-Social Center, Tjeter Vizion, Different and Equal, and Key Adviser Ltd.<sup>8</sup> All four organisations were interviewed for the FFM report.
11. As noted in my review of the previous CPIN, there are no shelters for adult male victims, although there is a limited amount of support. Vatra Psycho-Social Center and Tjeter Vizion do not appear to accommodate adult male victims.<sup>9</sup> Different and Equal does provide various forms of support for adult male victims, including rented apartments. It told the British Embassy that it is currently supporting 8 adult males.<sup>10</sup> Key Adviser is an employment agency which provides support in finding employment.<sup>11</sup> There is no suggestion that Key Adviser provides accommodation.
12. However, that does not mean that these services actually provide adequate protection against re-trafficking for vulnerable victims with serious mental health problems, low employability and limited coping skills. Different and Equal told the FFM team that trafficking survivors with mental health problems are at high risk of re-trafficking:

*"Q. Those who have left the service, what might increase their risk of being re-trafficked?"*

*A. If their stay in the shelter was short, the risk is higher. To recover from trauma needs a long time. The risk is very high. And cases with mental health issues, they are at high risk. Sometimes we have cases where we could not find a solution in the system so we supported them for a long time, so it's not easy."<sup>12</sup>*

13. Terre des Hommes, another implementing partner for the UNICEF programme, told the FFM team:

*"Q. Are there any barriers to long term reintegration?"*

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<sup>8</sup> Geographic distribution of programme services <https://endhumantrafficking.al/map-of-services/>

<sup>9</sup> Tjeter Vizion's shelter is for minors, although it does have two emergency beds for adults: FFM report, op. cit., pp 24-25. It confirmed to the British Embassy that it was not supporting any adult males: CPIN, op. cit., pp 99-100. Vatra told the British Embassy, in relation to adult males, "we don't provide": CPIN, op. cit., p 106. Confusingly Vatra does report that it is currently supporting one adult male in accommodation outside the shelter, but no details are given: ibid.

<sup>10</sup> CPIN, op. cit., at pp 95-96.

<sup>11</sup> See FFM report, op. cit., pp 98-101.

<sup>12</sup> FFM report, op. cit., p 20.

*A. Yes there are. Because although we claim that we have a well-developed national referral mechanism (NRM) with the responsible authority at the centre to manage assessment of VOT adults and children, and rights and protection of children, in real terms all of the work is actually done by the NGOs. The state claim they have a case management system in place, they do not, they have a case management approach but it is not systemised as it should be. Long term integration happens at a community level, not at the shelter, it has to happen in the community. Some types of service are not available or accessible. Sometimes they don't exist at all...*

*Q. Albania has a framework for reintegration but are there budget concerns?*

*A. Albania has a developed framework. NGOs know about case management and long term integration, there are hundreds of manuals. But do the state institutions know? They just ask the NGOs to do the job and take the credit. I have been implementing regional protection for the last 5 years and now writing a proposal. Right now looking at the reality of Balkan counties and compared to other countries, the government of Albania is doing better, but of course it's never enough.*

*It's not even half of the funding that is needed for reintegration. So they may do better than neighbouring countries, but they barely reaching half of the financing.”<sup>13</sup>*

14. A study conducted by Deanna Davy for UNICEF on economic reintegration of trafficking survivors evaluated the effectiveness of reintegration support. It found:

*“At the society level, a key challenge for survivors in accessing decent employment is that there are few decent work opportunities for survivors in Albania. The unemployment rate in Albania is increasing, and is particularly high among young people. Prior to the COVID-19 pandemic, the rate had been steadily decreasing. However, it is thought that the pandemic reversed any gains. The recent literature highlights that, in a climate of increasing unemployment, trafficking survivors' chances of finding gainful employment are small. The chances of such a person finding employment cannot be expected to be higher than for other unemployed people, which are very low anyway...*

*Another individual-level factor is that some survivors suffer ongoing trauma, which reduces their ability to maintain employment...*

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<sup>13</sup> FFM report, op. cit., p 92.

*Another key challenge at the community level for survivors in sustaining employment is the one of stigma. Both survivors and key informants reported that a survivor may mention to a colleague that they have been trafficked, leading to the survivor being stigmatised by their colleagues and feeling so discriminated against that they are forced to quit their new job...*

*At the society level, a key challenge in sustaining employment is that, in some cases, the pay is too small for the survivors to pay their rent and other essentials. This appears to be problematic in cities such as Tirana where rent is the highest in Albania. Consequently, survivors may quit their new job to pursue other training and employment opportunities.*

*Also at this level, interviews conducted for the present study identified that not all survivors find employment after registering with [the National Agency for Employment and Skills]. Many wait for a long time after submitting their application for employment support through the agency, and may wait many more months before being offered work. This finding also aligns with the literature where scholars argue that while unemployed trafficking survivors have the right to register as jobseekers at NAES, the service is a time-consuming and demotivating process for trafficking survivors, who often wait many months to find a job, leading to financial instability and reversing any mental health gains. This study identified that as a result of the long NAES waiting times, many survivors opt to find employment through word of mouth or other channels.”<sup>14</sup>*

15. In relation to support with starting a business, the study found:

*“There are, however, also many challenges facing survivors starting and maintaining their own business, including, but certainly not limited to survivors’ lack of business nous, lack of start-up capital, business competition, and discrimination. Many of these challenges are at individual, community and society levels.*

*At the individual level, despite the business management and other training that survivors receive prior to starting their own business, the first few weeks of a new business can be very daunting...*

*Also at the community level, a key challenge for survivors who want to start their own business is lack of start-up capital. When a business can be run from home, the survivor only requires a small amount of capital to purchase equipment and materials. However, survivors may not have the money to*

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<sup>14</sup> Deanna Davy, Economic reintegration of trafficking survivors in Albania, UNICEF, July 2022  
<https://www.unicef.org/albania/reports/economic-reintegration-trafficking-survivors-albania>

*purchase even these items. For those who need to rent an office or other space in which to conduct their business, more start-up capital is required. Lack of capital is particularly problematic for survivors who wish to live and run their business in major cities such as Tirana, where rent and other costs are higher...*

*At the society level, a challenge for survivors starting their own business is competition. Despite market assessments being undertaken, after starting a business, the survivor may face stiff competition and few customers. Furthermore, even for businesses with some customers, the income generated may not be enough to sustain them...*

*The study identified that some of the self-employment challenges are unique to trafficking survivors. For example, the survivors cannot conduct a business from home where customers (strangers) come to the house for business purposes. While running a hairdressing or nail technical business from home might appear straightforward, having strangers entering their home might create worries for safety and security...*

*Trafficking survivors are also unique in that they are unable to take out loans as easily as other individuals. They may have been deceived into exploitative labour previously because of an artificial debt or be aware that taking on a loan might make them vulnerable to exploitative employment in order to service the loan. Thus, if a survivor's business is failing, they would normally consider alternative income generation that does not involve borrowing money from banks or individuals."<sup>15</sup>*

16. Similarly, Klea Ramaj's study, which I referred to in my review of the previous CPIN, found:

*"Vocational training helped victims develop skills in cooking, tailoring, babysitting, hairdressing, or coffee machine repairing. Nevertheless, the income generated in these sectors is equal to Albania's minimum wage, which, as argued by most interviewees, is insufficient to cover basic living costs without external support. Ergo, the economic situation for trafficking victims not accommodated or financially supported by their families after leaving the shelter was particularly challenging...*

*Besides limited financial resources and pragmatic obstacles, long-term reintegration was negatively influenced by a lack of economic sustainability and exploitative working conditions. Most practitioners stipulated that for trafficking victims, building a healthy lifestyle was highly associated with financial steadiness. Nevertheless, employment was often unstable due to*

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<sup>15</sup> Ibid.



*factors related to the employers' unwillingness to support victims' professional development or to the sporadic nature of the private businesses in which victims would find employment. According to the interviewees, trafficking victims were mainly employed as manual workers in sweatshops with poor working conditions: "Victims work unreasonable hours for a low wage and often have no rights to paid holidays. In some cases, victims were fired because they had to skip a day from work due to illness" (SW2). Such adverse working conditions coupled with the victims' trauma and existent low self-esteem further discouraged and demotivated them. Therefore, the victims' experiences in the Albanian job market can be considered as a form of secondary victimization...*

*...most professionals stated that escaping miserable economic conditions was the primary reason for re-trafficking: "Accommodation and employment are crucial. If victims don't have enough financial resources, if they don't have a place where to sleep, in a short time they will re-fall prey to traffickers"..."<sup>16</sup>*

17. Even if a victim is supported to find work, that does not mean they will earn enough to live on. As I highlighted in my review of the previous CPIN, Mary Ward Loreto Foundation told the FFM team that the minimum wage is ALL 33,000 (EUR 300) while the cheapest rent is EUR 200 to 250 per month, making it *"almost impossible to live... moving into starvation level really."* The Foundation adds that *"...that is for people in good jobs working in call centres. Call centres are the biggest employers for the youth. Wages in factories are even less – in sweat shops you earn 150 euro a month. But there is no alternative. And in the south they are not even declaring employees so they are not protected and recruited on the black market."*<sup>17</sup> Ramaj similarly states *"long-term reintegration was negatively influenced by a lack of economic sustainability and exploitative working conditions... trafficking victims were mainly employed as manual workers in sweatshops with poor working conditions"*.<sup>18</sup>

18. Therefore, it can be seen that even with the support provided by UNICEF's implementing partners, there are significant barriers to employment and reintegration for the most vulnerable victims. This is clearly acknowledged both by UNICEF implementing partners and by research, including research commissioned by UNICEF itself. As highlighted in my review of the previous CPIN, the state aid provided to unemployed victims of trafficking is only ALL 9,000 (around EUR 80) per month and is not enough to live on.<sup>19</sup> UNICEF states that, although there is housing support in some

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<sup>16</sup> Klea Ramaj (2021) The Aftermath of Human Trafficking: Exploring the Albanian Victims' Return, Rehabilitation, and Reintegration Challenges, *Journal of Human Trafficking*, *Journal of Human Trafficking*, 7 May 2021 <https://www.tandfonline.com/doi/full/10.1080/23322705.2021.1920823>

<sup>17</sup> Home Office FFM report, op. cit., p 96.

<sup>18</sup> Ramaj, op. cit.

<sup>19</sup> FFM report, op. cit., pp 18 and 64; see also p 11 where UNICEF confirms that the support provided "is only \$90 USD a month and does not even cover basic living costs", and p 22 where the OSCE confirms that "government support is very low".

municipalities, it has stagnated and in some cases support is not being implemented.<sup>20</sup> Therefore, victims who cannot find stable employment may well find themselves destitute, putting them at high risk of future trafficking. Clearly, those victims who display the *TD and AD* risk factors – such as mental health problems, low education and lack of a support network – are likely to face the greatest difficulties.

19. The letter at Annex A also makes reference at [6(iii)] to an upcoming Home Office initiative:

*“ii. Reintegration: £11.1m in grant funding for financial years 22/23- 24/25 (£3.7m per year) across ten priority countries, including Albania. The programme will be accessible to all forms of returns (both voluntary and enforced) and will include services such as:*

*a. pre-departure information;*

*b. a ‘meet and greet’ service on arrival at the airport;*

*c. access to temporary accommodation prior to any onward journey to a final destination;*

*d. signposting to existing local services;*

*e. support with redocumentation/identification;*

*f. and job counselling and additional support with accessing the labour market.”<sup>21</sup>*

20. Little detail is given about this programme, and clearly it is not yet possible to evaluate its effectiveness. But even taking the claims of the British Embassy at their highest, £3.7 million per year divided across 10 countries would seem to be a small sum, in contrast with the £3.5 million already invested by the Home Office in the UNICEF programme in Albania alone. Even if delivered effectively, the services described would not seem likely to alleviate the problems highlighted above with long-term employment, housing and reintegration. For example, as set out above, “*job counselling and additional support with accessing the labour market*” is already available from various NGOs, but vulnerable victims still face significant barriers to finding work and supporting themselves. Similarly, “*access to temporary accommodation prior to any onward journey to a final destination*” does not alleviate the problem of being unable to afford long-term housing, and “*pre-departure information*” and “*signposting to existing local services*” do not alleviate the gaps in existing local services.

### **State protection**

21. Although the new CPIN does not contain significantly different information from its predecessor as regards the capacity of the Albanian police and judicial system to protect trafficking victims, it does state at [4.1.5] “*It is insufficient for the person to*

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<sup>20</sup> Ibid., p 11.

<sup>21</sup> CPIN, op. cit., p 85.

*simply assert, for example, that the police are corrupt and would not help them. Decision makers will need to probe the nature of the alleged corruption and why the police will not assist.”*

22. This is too sceptical an approach, when considered against the country background information on the pervasive corruption in Albania. It is clear from numerous sources quoted in the 2019 Asylos and Asylum Research Centre report that corrupt links between the authorities and criminal gangs are a pervasive problem in Albania. Dr Edlira Haxhiymeri said:

*“Judges accepts bribes to make decisions against the law because they think it is a chance for them to profit from the situation. They also for personal interests like family relations or people they know, make decisions against the law.*

*The legal system remains the most corrupt in the country and does not seem to be improved even under the so-called reform of the system.*

*[...] There are different forms of bribes I would say. Cash money in big amounts is one, offering land properties, expensive apartments in the capital city, villa and houses at the beach area, expensive vehicles, jewelry, etc. [...] The trafficker - paying under the table lots of money to stop the process - and in this case it is hard to continue with the prosecution.”<sup>22</sup>*

23. An anonymous source said:

*“I’ve even had discussions with officials and NGOs who work in Albania about this issue [the implementation gap between legislation and practice] who have acknowledged that there is a history of direct links between officials in Albanian government and police and traffickers. Some people have been prosecuted. Some individuals known to have been involved or had historic involvement, are still in positions of authority in Albania currently. So it’s my viewpoint that this makes it very difficult to have robust response to these issues.”<sup>23</sup>*

24. Dr Stephanie Schwandner-Sievers (whose evidence was given significant weight by the Upper Tribunal in *AM and BM (Trafficked women) Albania CG* [2010] UKUT 80 (IAC)) said:

*“[...] the only people who get justice are those who have more money and better connections. That means that if you are a vulnerable victim, a really vulnerable trafficking victim, and you’re up against somebody who is a big organized crime boss with lots of money, you have no chance because this*

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<sup>22</sup> Asylos/ARC, op. cit., p 83.

<sup>23</sup> Ibid.

*person can bribe whomever, and they have the connections too. You are basically excluded from justice, regardless of what is on paper, it happens really subtly. It happens in the way in which certain things are submitted or not, so it's very difficult to put your hand on where the problem really is because, if you observe, say, a court case, it looks all fabulous, but some of the things may not have been even admitted as evidence or witnesses or what-not. There are also real threats and stuff. So corruption is the big issue of whether somebody can actually have fair access to justice and protection.”<sup>24</sup>*

25. Alfred Matoshi of the Mary Ward Loreto Foundation stated:

*“The guy who is directing everything is always outside because he is always in collaboration with the officers or the judge and this is the biggest problem that we have in implementation of the law regarding trafficking. We know big source of money, and they always achieve corrupting the people they want. The impact is they have no hope, no trust in institutions and usually they over accept the fact they are...so they re-enter the world of trafficking or they end up in prison.”<sup>25</sup>*

26. Nothing in the CPIN undermines any of the above. In fact, the CPIN quotes the above sources at [10.7.1] [10.7.2].<sup>26</sup> With this in mind, where a person establishes a risk of being trafficked or re-trafficked by criminal gangs, they will have a strong case that the police would not adequately protect them, due to the endemic corruption in the Albanian state and the strong links between gangs and police. This is as true for male victims as female ones; indeed the Asylos/ARC report relates specifically to male victims.

## **Conclusion**

27. The conclusions in my review of the previous CPIN remain valid. Trafficked boys and men who exhibit some or all of the *TD and AD* risk factors are likely to be at risk of re-trafficking in Albania, and will not be adequately protected by the Albanian state. Claims by trafficked men and boys are not suitable for certification as clearly unfounded.

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<sup>24</sup> Ibid., p 84.

<sup>25</sup> Ibid.

<sup>26</sup> CPIN, op. cit., p 46.