







INSigHT - Building Capacity to Deal with

Human Trafficking and Transit Routes in Nigeria, Italy, Sweden

WORKSHOP "WORKING WITH HUMAN TRAFFICKING IN SWEDEN & ITALY-COMING TOGETHER FOR TRANSNATIONAL COLLABORATION"

26 June 2020 (14 - 16)

Zoom

Agenda

- 1. Presentation of the residence permits available to trafficking victims in Italy, Devisri Nambiar (Socio-Legal Operator, N.A.Ve Project, Equality, Italy)
- 2. Discussion & questions, open for all participants
- 3. Presentation of the residence permits available to trafficking victims in Sweden, Elin Johansson (Regional Anti-Trafficking Coordinator Region South, Sweden)
- 4. Discussion & questions, open for all participants
- 5. Wrap up

List of Attendees

Stakeholders invited

Elin Johansson, Regional Anti-Trafficking Coordinator Region South

 $Sara\ Olsson, Regional\ Anti-Trafficking\ Coordinator\ Region\ South$

Devisri Nambiar, Socio-Legal Operator, N.A.Ve Project, Equality

Elisa Bedin, Anti-Trafficking Operator of the N.A.Ve Project

Erica Lerco, Anti-Trafficking Social Worker, N.A.Ve Project, Azalea

Chiara De Zan, Anti-Trafficking Social Worker, N.A.Ve Project, Equality

Francesca Sguotti, Anti-Trafficking Social Worker, N.A.Ve Project, Equality

Roberta Amore, Anti-Trafficking Social Worker, N.A.Ve Project, Equality

George Mekolle Ngoe, Cultural Mediator, N.A.Ve Project, Equality



















INSigHT Action Partners

Barbara Maculan, President of Equality, N.A.Ve Project

Gaia Borgato, Coordinator for INSigHT Action of Equality, N.A.Ve Project:

Isabelle Johansson, IUAV, Researcher for the INSigHT Action

Michela Semprebon, IUAV/SSIIM, Research Coordinator for the INSigHT Action

Silvia Etrari, Social Worker of Mobile Outreach Unit, N.A.Ve Project, Azalea & INSigHT Action:

Executive Summary

Presentation of the residence permits available to trafficking victims in Italy

The presentation started with an introduction of the permits relevant to trafficking victims as they relate to article 18 and 22 (Testo Unico Immigrazione, D. Lgs. n. 286, 25/07/1998). The bracketed information next to each permit explains the reason the permit was granted in broad terms. This information can be useful when the Swedish colleagues encounter potential victims who have previously been in Italy and possess a permit.

The I_{st} permit presented was the following:

Victim of severe exploitation - Art. 18 "motivi umanitari" or "casi speciali"

This permit can be given to:

- a person who is identified, in a judicial procedure or by social services, as victim of violence or severe exploitation, who is in danger because of the will to withdraw from the exploiting organization and who adheres to an assistance and social integration program
- 6 months + 1 year, convertible into work or study permit

Regardless of the way the person is identified as a victim, they can receive a permit and access an assistance and social integration program. The maximum period of renewal of this permit is 18 months, after which the person must convert the permit into a residence permit for the purpose of work or studies. While the law includes the possibility to convert the permit into a study permit, there have not been many cases where such a conversion has taken place. There have, however, been cases where a person had not yet found work but was still able to obtain a work permit. While the law does not foresee this possibility, factors such as economic crisis or some specific situation of the person have resulted in a more lenient approach. The importance of the two possible ways of





















accessing this permit was emphasized by the Italian colleagues (through social services or the judicial procedure), as there are cases where victims do not possess the necessary information about the perpetrators to collaborate in the judicial proceedings. Furthermore, there are cases where other factors may hinder a victim from providing information about their perpetrators – the family may be involved and/or the person may be too afraid to collaborate with law enforcement. Note that this permit is only valid for the duration of the assistance and social integration program. While a person may still have a permit in hand it is not valid if the person has left the program.

The 2nd permit presented was the following:

Minor author of crime - Art. 18 c. 6 "motivi umanitari" or "casi speciali"

This permit can be given to:

- a person who has committed a crime during minor age and who, at the end of detention, adheres to an assistance and social integration program
- 6 months + 1 year, convertible into work or study permit

The idea behind this permit is that full responsibility of a committed crime cannot be placed on a minor. This permit has similar characteristics as the permit above, in that it can be renewed for a maximum period of 18 months. This permit has, however, been used in few cases but N.A.V.e are currently working towards being able to use it more often.

The 3rd permit presented was the following:

Victim of domestic violence - Art. 18 bis "motivi umanitari" or "casi speciali"

This permit can be given to:

- a person who is victim of domestic violence (physical, sexual psychological or economic violence between people who are or who were in affection ties)
- 1 year, convertible into work or study permit

In terms of duration, this permit has similar characteristics as the abovementioned permits.



















The 4th permit presented was the following:

Victim of severe exploitation on workplace - Art. 22 c. 12 "motivi umanitari" or "casi speciali"

This permit can be given to:

- a person who has been severely exploited on work place, because of his or her state
 of need, and who collaborates with judicial authorities
- 6 months + 1 year, convertible into work or study permit

The idea here is that the perpetrators are making use of the vulnerable state of the victim, as their needs may make them likely to accept poor working conditions, low wage and accommodation that is substandard etc.

None of the abovementioned permits include specific information pertaining to the reason why the permit was granted (e.g. victim of trafficking), as this could result in stigmatization. As mentioned, they instead use a broader description category. Previously, what was written on the physical permits permit was "motivi umanitari" (humanitarian reasons). This is not the case anymore and what they instead say is "casi speciali" (special cases).

The presentation then proceeded to address permits relevant to trafficking victims as they relate to asylum. Since 2016, people who have an asylum permit of some sort have been able to access anti-trafficking programs in Italy.

The 5th permit presented was the following:

Asylum seeker "richiesta asilo"

This permit can be given to:

- a person who has formalized the request for international protection and has not completed the procedure (administrative or judicial phase)
- 6 months, renewable as long as the procedure is open

The asylum request procedure in Italy can be rather long. The asylum seeking phase can take more than 1 year. If the person goes for an appeal after a first negative decision it may take up to 3 years. In this case, the person's status as an asylum seeker stands. If the person has a permit as an asylum seeker it will say "richiesta asilo". Asylum seekers are not allowed to work for the first 2 months of this procedure. After 2 months, it is possible to obtain work. However, the asylum seeker permit cannot be converted into a work permit (unlike the art. 18 or 22 permits).





















A person who comes forth as an asylum seeker in Italy, but have already requested asylum in a different EU-country may be given the following permit as Italian authorities await a reply from another EU-country:

Asylum seeker - Dublin procedure "richiesta asilo att. Dublino"

- a person who has formalized the request for international protection and is waiting for the definition of the country in charge
- 6 months, renewable as long as the procedure is open

The following permits also exist in Italy:

Refugee status "asilo"

5 years, renewable and convertible

Subsidiary protection "protezione sussidiaria"

• 5 years, renewable and convertible

As asylum and subsidiary protection relate to international law, not much time was spent going over these permits.

The Italian colleagues emphasized the work NAVe have been doing with the Italian territorial commission (the agencies in charge of evaluating requests for residence permits in Italy). N.A.V.e have seen a positive development in this regard. The territorial commissions have understood the importance of time, in that a person who may be a potential trafficking victim and has applied for asylum is not necessarily able to talk about their experiences within the first 6 months programed for the asylum request. N.A.V.e have managed to request a second permit for potential trafficking victims who have sought sylum.

The 6th permit presented more in-dept was the following:

Humanitarian protection "motivi umanitari" or "casi speciali"

- a person who needs protection for the violation of human rights, according to constitutional and international obligations
- 2 years, since October 2018 abolished, now only convertible into work permit

This permit relates to the same law that concerns the article 18 and 22 permits described above, dating back to 1998. There have been cases where this permit has been used by territorial commissions when they have suspected that a person was a trafficking victim but had not yet been able to confirm their suspicions.

This permit was canceled in October 2018, but here are people who sought asylum prior to its cancellation who still possess this permit. This permit relates to obligations set out in the Italian constitution as well as international agreements. It could be granted to an ample amount of cases of





















people who had suffered different forms of human rights violations, in their countries of origin or elsewhere. There have been discussions about introducing a similar permit, as there is currently a "permit gap" in Italy in terms of the rights and obligations set out in the constitution.

There are also permits relevant to trafficking victims relating to the categories below. However, the time at hand was insufficient to address all relevant permits.

- Minor age
- Minor age administrative longment (meaning?)
- Work/work search
- Medical care
- Justice reasons
- Protection of minors

Questions & Discussion

The Swedish colleagues asked what the Italian assistance and social integration programs for trafficking victims entail. Sweden work differ in that there is no such program. Instead, Sweden works according to the National Referral Mechanism (NRM). (The closest thing resembling the Italian programs in Sweden, is the National Support Program offered by the Swedish Platform Civil Society against Human Trafficking, but it is not as systematic.)

The Italian colleagues explained that the assistance and social integration program is the frame within which the N.A.V.e.-project works. It is a state funded program, under the Department for Equal Opportunities, and includes a wide range of activities. The public social services play an important role in regards to the program. The program is supposed to support the person to reach integration and establish themselves in Italian society. The program consists of several phases. First, there is the phase of reflection period and protection when the person is entitled to sheltered accommodation. This phase is followed by a second phase where the focus is social integration. The program was introduced with article 18 back in 1998 as a "social protection program". It was connected to the idea of giving people the possibility to escape situations of severe exploitation.

The Swedish colleagues asked to hear more about the different permits a person may possess.

The Italian colleagues explained that it could be the case that a person appears in Sweden with a permit saying either "casi speciali" (special cases) or "motivi umanitari" (humanitarian reasons), but it could also be that their permit say "richiesta asilo" (asylum request). The idea is that the person walk around with a permit saying "victim of trafficking". Based on the duration of the permit they possess,



















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you may be able to discern what kind of permit they have. Notably, in Italy, one person may actually be going through an asylum procedure and an article 18 procedure simultaneously. It can happen that a person's situation includes elements relevant to both kinds of permits. In practice, the person has only one permit in hand but both paths can be ongoing in parallel. For instance, a person who collaborates with the Italian authorities in the judicial proceedings is authorized to receive an article 18-permit. At the same time, going back to the country of origin may pose a threat to the person, making them eligible to seek asylum. In fact, collaboration with authorities may increase the risk of going back to the country of origin. It is ultimately up to the individual to decide which path they eventually want to go down. However, they may not be able to distinguish between the different procedures. N.A.V.e works actively with explaining the make-up of different permits, as it is important from a social perspective, but the differences are not always fully grasped. Through their work, N.A.V.e have observed that there is an expectation that people know the kind of permits they possess from the part of the Italian institutions, but the reality does not necessarily coincide with institutional expectations. In practice, people refer to their permits with reference to the duration: "permesso di 2/5 anni" (permit of 2/5 years) etc. As mentioned, it may be possible to deduce which permit they have based on the duration/time reference. An important difference between the permits relating to "casi speciali" (special cases)/"motivi umanitari" (humanitarian reasons) and the asylum permits is that the former two are intended for cases where the exploitation has occurred in Italy, whereas the latter is intended for cases where problems relate to the country of origin. Notably, the different permits provide a different set of rights.

The Swedish colleagues asked about the issue of the current "permit gap" that exists in Italy.

The Italian colleagues explained that the gap came about when the previously existing humanitarian protection permit was canceled in October 2018. The permit provided protection from what could happen if victims were sent back to their country of origin – if there was a threat to their civil rights somehow. As mentioned, now there is nothing that provides the same range of protection besides the so-called "asilo" (asylum) or "sussidiaria" (subsidiary), which relate to other situations. The lack of a similar permit as the one for humanitarian protection means that there is a certain lack of protection. Humanitarian protection permits could, for instance, be given to minors who had left their home country as minors and suffered different forms of exploitation or violence on their migratory journeys in countries like Libya. It allowed for different considerations than the other types of existing protection permits. Vulnerability in different phases along the way could be taken into consideration. The permit did not necessitate that they were part of a specific social group to be entitled to protection. Also, the life a person had built up in Italy could be taken into consideration.





















Presentation of the residence permits in Sweden available to trafficking victims in Sweden

(Information about the permits in English can also be found here: https://www.nmtsverige.se/sites/default/files/ta_sgea_national_referral_mechanism_191203.p df)

The presentation of the Swedish colleagues focused on the temporary permits you can obtain as a trafficking victim if you are part of a criminal investigation in Sweden. The possibility to stay in Sweden

trafficking victim if you are part of a criminal investigation in Sweden. The possibility to stay in Sweden as a trafficking victim is very much tied to a police report and the initiation of a preliminary investigation against a perpetrator. There are two different permits relating to this process: I. a reflection period permit, and 2. a temporary residence permit for partaking in the criminal proceedings. Unlike the article 18 and 22 permits in Italy, the permits that trafficking victims can obtain in Sweden are currently conditional, in that some contact with the Swedish law enforcement is required to access a permit. The Swedish permits are intended for crime victims in general (i.e. not specific to trafficking victims). Contact with Swedish law enforcement plays a significant role in determining whether victims access a permit and subsequent support and protection. (Compare to Italy, where there is no specific permit for a period of reflection and support can still be provided.)

The Ist permit presented was the following:

I. Reflection period permit - "betänketid" (5 kap. 15 § utlänningslagen (2005:716)

- Permit of 30 days (+ 30 days).
- An application for a reflection period should be made soon after a preliminary investigation has been initiated.
- The leader of the preliminary investigation shall apply for this permit on behalf of the victim.
- The purpose of the permit is to provide victims with a period of recovery from the situation they have been through in order to make an informed decision on participation in the legal process.
- The victim does not need to have explicitly expressed a willingness to cooperate with the investigating authorities or in the preliminary investigation.
- The holder of this permit has the same rights as Swedish citizens in terms of healthcare and social service support (the regional coordinators are often involved in facilitating such necessary contacts to minimize the amount of people around the victim).
- Can be extended upon request from the leader of the preliminary investigation if there is a special need for granting an extension.

Reflection period for children



















- A prolonged reflection period may be given to victims under the age of 18.
- When an unaccompanied child is granted a residence permit, an appointed guardian shall be designated for the child.
- Children who hold a temporary residence permit for a reflection period have the right to free basic education in Swedish public schools.

In accordance with the international conventions, everyone who is a presumed trafficking victim should be given access to their rights, regardless of whether criminal proceedings have been initiated. In reality, however, this is more the goal in Sweden, than current practice. Accessing social service support is significantly easier if a person obtains a temporary permit, including financial support, healthcare, shelter etc., which many people need. At times, the regional coordinators have to wait for a permit to arrive before they can access assistance from the social services. There is an ongoing discussion in Sweden regarding extending the possibility of applying for a reflection permit to regional coordinators. The fact that they are currently unable to do so presents a problem, as there are cases where potential victims are afraid of the police and/or distrust authorities. Some people say they need some time, others do not want to talk to the police at all. If the victim does not wish to engage with the police, the regional coordinators are not able to provide potential victims with the same help. In most cases victims have consented to a police contact through the coordinators, but it is not always the case. Further, one current problem that the regional coordinators encounter is a lack of interest from the part of the police to investigate cases where the exploitation has taken place outside of Sweden. It may also be difficult to investigate such cases. Moreover, the victim may not possess the necessary information to proceed with an investigation; they may not know where they have been, the name of the people who have been involved, the traveling route they have been on etc. In such cases, the police might not see any point even initiating an investigation - making it impossible for a potential trafficking victims to receive a permit and access the subsequent support and protection.





















The 2nd permit presented was the following:

2. Temporary residence permit – "tidsbegränsat uppehållstillstånd (TUT)" (5 kap. 15 § utlänningslagen (2005:716)

- Permit of at least six months. The duration of the residence permit is dependent on the duration of the judicial proceedings.
- The purpose of the permit is to facilitate the victim's participation in the judicial proceedings (the preliminary investigation and trial).
- The permit can be applied for when the reflection period expires, or earlier if the necessary conditions are met.

The Swedish Migration Agency shall grant a TUT-permit if conditions are met:

- · A preliminary investigation or a main hearing in a criminal case is required,
- The victim has clearly demonstrated his or her intention to cooperate with the investigating authorities,
- The victim has broken off all contact with the persons suspected of perpetrating the crime in question during the preliminary investigation,
- Considerations for public order and safety do not indicate that a permit should not be issued
- The permit can be revoked if the conditions are no longer met.

The conditions of this permit may be hard to meet. There are cases, especially involving adults, where the victim is too afraid to break the contact with the perpetrators. In cases involving children, on the other hand, authorities are able to remove children from any contacts without the child's consent. The Swedish colleagues explained how the fact that the duration of the permit is dependent on the judicial proceedings can cause a lot of stress for victims.

Support for those without permits

If no residence permit has been granted, the rights of a victim will depend on whether the individual is an asylum seeker, an EU citizen (here the right of residence is examined) or is residing in the country without the necessary permit. For adult trafficking victims who do not possess a permit, have the right of residence under EU law or have the status of asylum seeker, social service's responsibility is limited to remedying an emergency situation that cannot be resolved otherwise (known as an emergency evaluation or emergency assistance). If you are an undocumented EU-migrant, you can access emergency aid from the social services, meaning a ticket home or a shelter before traveling. It may be possible to offer extended support based on individual's needs in some cases where there is no





















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residence permit, but it is a challenging endeavor. In cases involving EU-citizens, there can be difficulties accessing healthcare services because they do not necessarily have the necessary insurance and/or are undocumented. In the city of Malmö, there is the so-called "Flyktinghälsan" (Refugee health), which provides more than the legal minimum, but that is not the case across the country. In addition to the emergency assistance measures taken by social services, supplementary support could be offered by the Swedish Platform Civil Society against Human Trafficking (www.manniskohandel.se) or by other actors in civil society if they are in the position to do so. In regards to children, on the other hand, the social services' responsibility is larger, regardless of their legal status in the country and the child's best interests shall always be considered.

Trafficking is not a ground for asylum.

If a victim states that they are unable to return to their home country, information shall be provided about the options of applying for a residence permit on other grounds, such as: refugee status, as a person in need of protection (asylum) or due to "particularly distressing circumstances" (synnerligen/särskilt ömmande omständigheter). Having been a trafficking victim does not constitute grounds for asylum in and of itself, rather, the decision is always based on both the need for protection and the home country's ability to protect the individual. Consideration shall also be given to the possibility to live in a region in the home country other than the specific area the individual comes from. The Swedish colleagues explained that many of the people they come across are Dublin cases who need to be sent back to Italy. They may also possess an Italian permit of some sort. Many express that they do not wish to return to Italy. Moreover, the Swedish colleagues explained that it is very rare that they come across cases where individuals receive asylum in Sweden – it almost never happens.





















Questions & Discussion

The Swedish colleagues posed a question to the workshop on behalf of the Swedish Migration Agency (they were not allowed to participate because of Zoom). The question regarded the appropriateness of the including the following message when a trafficking victim is transferred from one country to another:

"To whom it may concern,

It has come to our attention that the applicant (name), born (date) has been a victim of human trafficking and at her request we inform you about this and hope that you take necessary precautions".

This message has been used in cases when the Migration Agency when has transferred a person who has claimed to be a trafficking victim to a country such as Italy. It is unclear how this message is passed on and the Swedish colleagues will inquire further into this matter. The Swedish Migration Agency had also reported that they fail to see any patterns regarding the status of Nigerian nationals who have traveled to Sweden after spending time in Italy; some have only left their fingerprints, others have come to Sweden with Italian permits, yet others have been illegal in Italy, living in refugee camps. Based on this observation, the Swedish Migration Agency asked the workshop participants to reflect on why people continue to Sweden. Is it the case that they travel to Sweden because it is hard to convert permits/receive a more long-term permit in Italy after their previous permit has expired?

Moreover, the Swedish Migration Agency reported that they are unable to discern the number of trafficking victims who have received asylum in Sweden. Since trafficking is not a ground for asylum in and of itself there is a form of "information gap" regarding this aspect in their statistics.

The Italian colleagues reacted to the appropriateness of the message above, saying that it depends on who receives it. Michela linked to the procedures of the Dublin Unit, saying whenever the Unit receives a request from any given country the request is reported in a specific module. This module includes a number of questions — one which asks whether the person is/is showing any potential signs of being a trafficking victims. If it is the case, the Dublin Unit asks for an appointment with the country requesting the transfer. The purpose of the appointment is to assess the safety of returning the person to the country in charge. It is important to convey information about signs of trafficking because then the Dublin Unit is supposed to contact the local authorities in order for special assistance to be provided. Oftentimes, however, countries do not report that people may be trafficking victims because it may hinder their transfer to the country in charge.



















The Italian colleagues emphasized the need for European countries to harmonize these procedures. In Italy, NA.V.e will likely attempt to work with the Dublin Unit in this regard.

The Italian colleagues asked about the Swedish NRM, wanting to know which are the main actors requesting an intervention from the part of the regional coordinators.

The Swedish colleagues explained that, in most cases, it is the Swedish Migration Agency that approaches them with questions about identification. Cases can also be brought to their attention from a detention center, where a person is being held awaiting their deportation. As such, it can be at either stage of the asylum process. The police may also be the ones reaching out, for example, after having identified presumed victims in apartment brothels. Civil society organization also get in touch with them, especially in cases involving EU-citizens. In regards to the Nigerian group, however, it is mostly the Swedish Migration Agency. The regional coordinators have observed a positive development, in that people are getting in touch with them earlier in the process.

The Italian colleagues asked about borders in the area where the regional coordinators work (south Sweden), as Swedish law enforcement officers had told one of the Italian colleagues that they identify victims of the border with help from the regional coordinators.

The Swedish colleagues explained that in such an instance, the first contact is often the "Socialjour" (an emergency social service group operating outside business hours), who in turn gets in touch with them. At the moment, most cases come over the Öresund-bridge (linking Denmark and Sweden). Before, more cases came from the other border areas too. When it comes to minors, there is a team of social workers who only work with unaccompanied minors with good networks across the countries, meaning the regional coordinators do not really get involved in such cases (except if such a minor has committed a crime in the city of Malmö and the human trafficking group at the police is involved). There are many borders around the southern Swedish region, but the collaboration with border police is currently not solid. Unfortunately, there are currently no regular meetings between the regional coordinators the border police.

The Italian colleagues asked about the evaluation of potential victims, saying it would be helpful to understand the procedures through which the Swedish colleagues start their evaluation. A fundamental aspect to assess is whether it is voluntary or by force. This question relates to the one posed by the Swedish Migration Agency regarding why people migrate from Italy to Sweden. The Italian colleagues said they could share the procedures used by N.A.V.e to help the regional coordinators. Further, it would be useful for the Italian colleagues to know what kind of information they could provide in order to help victims in Sweden better represent their situation in Italy. As previously mentioned, sometimes people do not know what kind of permit they have, as the madame or criminal organization may have





















done the paper works for them. For the Italian colleagues, it would be good to know more about the Swedish system so they can communicate with people regarding how to access help in Sweden, if they were to go there.

The Swedish colleagues reiterated that the support available is rather limited if the person is a Dublin case coming from Italy. If there is an ongoing investigation some support is given, but once the permit expires people "end up on square one" again.

The Italian colleagues asked whether the regional coordinators have encountered any victims who have conveyed that a madams has forced them to travel to Sweden and if they have come across evidence of any networks. Knowing whether that is the case would be relevant to organize a safe return to Italy, in case they are Dublin.

The Swedish colleagues confirmed that they have come across cases where people have been forced to travel from Sweden to Italy.

The Italian colleagues asked if the Swedish colleagues also function as the social service reference to victims.

The Swedish colleagues explained that they only act as support, but have no decision-making power. In the best case scenario, they can talk to the person and help them express their needs to other authorities (such as social services) so their needs are met.

The Italian colleagues inquired into any potential collaboration between Swedish and Italian police.

The Swedish colleagues explained that they are unsure about the extent of collaboration, but

believe that it is limited. They know the Swedish police has established collaboration with other

countries, ex. Romania.

The Swedish colleagues asked what kind of information would be of help to the Italian colleagues in cases of returns.

The Italian colleagues compared the return of a Dublin case to the organization of a voluntary return to a country of origin, stating that if it is not safe a return should not be made. There is a need to establish procedures similar to voluntary return programs to ensure safe Dublin returns.

The Swedish colleagues emphasized how the Swedish Migration Agency asks people who are to be transferred to another country in charge to asses where it is safe for them to go, but people may have a hard time assessing where they are safe. Moreover, in Dublin cases, when the receiving country does not respond it is treated as a "quiet access" assuming a return is okay. The dialogue between the countries appears to be poor in this regard. One thing the regional coordinators hope our collaboration will result in is safer returns for the people they meet – more information and better





















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connections in Italy could certainly facilitate the risk assessment, which can currently be substandard in cases where IOM cannot be involved.

Wrap up

The participants agreed to follow up with a third workshop focusing on developing guidelines for procedures of evaluation in order to make returns safer for the people involved.









