UNIJERPS
Unizik Journal of Educational Research and Policy Studies VOL.19 (2);
January-June, 2025 https://unijerps.org
2023 Impact Factor: **6.834;** 2022 ***Impact Factor***: 5.156; ***2021 Impact Factor: 5.641;***
2020 Impact Factor: 5.355. *Indexing and Impact Factor URL:* http://sjifactor.com/passport.php?id=21363

CONVICTION OF NICKY ISABELLA BY GHANAIAN CIRCUIT COURT, APPRAISAL OF LEGAL IMPACT IN AFRICA

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ABSTRACT
Slavery is condemned in the whole man's race as grave crime against man. As a result of this, many governments in different countries of the world including International Governmental at States and reputable organizations round the globe have condemned it. Laws and instruments have been rolled out against modern slavery and trafficking in all continents Africa inclusive. A Nigerian hairdresser Nicky Isabella was convicted on the 3/4/2025 by a Ghana circuit court for offence of trafficking and conspiracy to trafficked two young Nigerians to Ghana on promise of employment which turned out not to be so. This paper examined the facts of the case, the laws and the conviction, the correction of the offence to modern slavery, the sentencing style, contributions of the conviction to Ghanaians legal and jurisprudence and indeed Africa and concluded with recommendations.

Keywords: Slavery, Court, Trafficking in Person, Forced Labour and Inhuman and Degrading Treatment.

Introduction
The case Nicky Isabella, a 22 years Nigerian Hairdresser and her conviction by the Ghana's Circuit Court in Ghana, is an interesting one. It is interesting not because sympathy should be given to the defendant but rather one feels for two innocent victims taken all the way from Nigerian to Ghana with promise to work only to find themselves in the six business of prostitution. Ghana is not Nigeria and if it was in Nigeria, Isabella will not even be noticed, let alone prosecuted or being convicted.

It is not just Nigeria but the same thing applies in other African States (Abonyi, 2024). Slavery and trafficking have no geographical restriction and it cuts across the globe, what the different is how it is responded to. This article reviewed Nicky Isabella, the decision of the Achimota Circuit Court of Ghana and highlighted the laws against slavery and trafficking in Nigeria, Ghana, UK and beyond, including international conventions. The article also considered the challenges inherent in holding perpetrators of slavery and the related crime of trafficking in Africa and concluded with recommendations.

It is viewed that the conviction of Isabella is well reasoned and considered and it is accepted. The issue of using the two women victims transferred to Ghana by Isabella on the promise that she will secure a job for them and the subsequent turn of event and use of the victims for prostitution and collection of payment by Isabella for the sexual services rendered and provided by the victims to their supposed clients is to

say the least unthinkable and unimaginable in this twenty first century civilization and is inhuman and completely a degrading and cruel punishment (Abonyi, 2020).

Conceptual Definitions

i. Slavery:

In many national constitutions including Nigeria, Slavery is prohibited. No citizen is allowed to be subjected to slavery. Apart from National legislations, slavery is also prohibited by regional and international conventions and charters or guidelines are case may be.

The word Slavery is defined by Black's Law Dictionary as:

> "The state of being subject to the will of another as a servant or bondman, a condition of compulsory service or bondage (Black's Law Dictionary, 2019)"

From the definition given to the word slavery by the Black's Law Dictionary above, it means that the person enslaved or subjected to slavery has no will of his or her own and does not decide what to do for himself or herself but rather depends on the dictates of another and is under bondage and compulsory dictates of whatever controls him or her.

Thus, he or she has no choice as to what he or she does, how he does it and when to do such things. The slave will have no option even if what she or he is compelled or required to do will affect him or her negatively, the most important thing is that he or she must do it. This is inhuman and indeed a reckless abuse of such person's right to personal dignity and even respect for him or her as a human being created by God and protected by the law of the state and the international community.

Webster's Dictionary defined the word slavery to mean;

> "The state of a person who is held in forced servitude, a condition of hard labour (Merriam Webster's Dictionary, 2010)"

Looking at the above definition, and based on the views of Ezeaku (2019); Ekwesianya, Okaforcha and Okeke (2020), the slave is forced to do what he or she is required to do and she is doing it against her or his will and the service is one that is hard but he or she must do it. Isabella enslaved her two women victims when they arrived Ghana on the premises that they have come to work but became sex machines with little or no pay or at best paid by proxy.

Similarly, the Oxford Dictionary defined the word slavery to mean "a state of being a slave, a condition of being forced to work against ones will or being owned by someone else (Oxford Dictionary, 1989). Condition of slavery, as noted by Osegbue (2019); Anushiem and Anushiem, (2023), is a pitiable condition, a condition where one does the work he or she does not like or does not want to do but he or she has no option to say "No" and where he or she says "No" she or she is forced to do the work. A person under slavery is at the mercy of the person who controls him or her or owns him or her. Slaves, according to Nwankwo, (2022); Ugwaka and Igbokwe (2020), are like chattels but subjecting to this level or status affects their sensibilities, charges their orientation and makes them to feel like they are sub-humans or infidels whereas under the law, it should not be the case.

Interestingly, Ucheagwu-Okoye (2025); Okaforcha, and Okeke (2020), observed that a "slave" or a person under slavery is one who practically has lost his or her honour, respect and even will to another and is subjected to conditions of disrespect, inhumanity and status of a low person without value

of any kind. Such individual is not allowed to discover his or her potentials and is often treated as a person of little or no value or importance who is coerced to do things he or she never wished by force. In the case of the servant victim that left Uganda to UK on promise of luxury and fanciful lucrative job, she became a maid and subjected to all manner of work in the house of the convict but regrettably is not paid for her services by the Judge.

ii. Court:

A court is synonymous with the word bench or judge. It is a position of honour and respect. The judge or bench or court or Magistrate occupies a vantage position, a position of great expectation in the society. The Black's Law Dictionary defined a judge as a public officer authorized to hear and decide cases in a court of law. Ibe, (2022); Okoye and Ezeaku (2025) stated that courts are of different classes ranging from the lower to the higher courts and each is presided over by a person who is called a Judge or Magistrate which is used in the context of a person sitting and hearing a matter of dispute and at the end makes a decision over the said dispute between the parties involved. To this extent, the definition of Black's Law Dictionary of the term Judge connotes the "person" of the individual occupying the seat and such a person is employed to serve the public and not himself or herself (Black's Law Dictionary, 2019).

The Webster's Dictionary is in accord with the definition given to the term judge by Black's Law Dictionary when it defined a judge as a public official that hear and decide cases in court of law, evaluates the quality and character of something. The Oxford Dictionary gave meaning of the term judge in the same respect and so maintain that a judge hears and decide cases and disputes between parties. In deciding and hearing cases, the judge follows procedure laid by the Rules of Court and applies relevant laws and principles to ensure that justice reign in the society. A judge is expected to respect and promote rule of law and one of the cardinal principles of rule of law is quality before the law, respect for all citizens and prohibition of discrimination and subjection of individual to cruel punishment degrading and inhuman treatment of which slavery is one of them, such court or judge is expected to hear the parties fairly and come out with considered decision (Abonyi, 2019, 2024).

The Achimota Circuit Court of Ghana stands as an arbiter and umpire and occupies a sacred position with high level of it as institution to defend citizens of Ghana and even non-citizens in Ghana a like the victims. The fact of the case before the Achimota Circuit court of Ghana is that Nicky Isabella, a 22 years old Nigerian hairdresser was convicted by the court in Ghana for human trafficking and conspiracy to commit a crime and was sentenced to five fears with hand labour on the 2nd day of April 2025. Isabella lured two young Nigerian Women Grace Ebeaghor (23 years) and Kikelomo John (22 years) to Ghana with promise of jobs at Supermarket but on arrival forced them into prostitution, seizing their earnings and subjecting them to inhuman treatment. As opined by Ucheagwu-Okoye (2021); Ezeaku, (2025), it is sad to believe that the young women will go out to have sex with persons they do not know and yet are deprived of their earnings in the shoddy and risky engagement.

iii. Trafficking in Person:

Abonyi (2023) defined trafficking as the transportation of person or person from one place to another either in pretence for better employment or for other purposes including prostitution, or sex trade, forced labour or even for illegal organ removal or harvesting. Trafficking in person, according to

Enwezor, (2021); Onyekwelu and Adinna (2022), is a serious menance to the international community. It is a transnational crime or cross border crime involving persons operating in a form of network and the products i.e the victims are sources from poor countries and transported through the transit countries and eventually received at the country of destination usually the west. According to Okechukwu (2025); Ugwaka and Igbokwe (2023), the traffickers operate in form of an organized syndicate and usually put on the colour of a corporate legal enterprise either as labour recruiting outlets or "employment concerns" but are purely an "uncovered criminal enterprise" or "gang". Owing to the nature of the crime being one surrounded with secrecy and sometimes family members co-opted as elements or agents or conspirators, Ofozoba and Ofozoba (2023); Anushiem, (2023) noted that accountability becomes difficulty since the victim show reluctance and unwillingness to assist law enforcement agencies in ensuring that perpetrators are held responsible, besides this, the traffickers use threat and at other times use monetary rewards to entice those who could have stood up against them and at the end the whole evidence is suppressed or even destroyed as case may be.

Black's Law Dictionary defined the word trafficking to mean trading on something or dealing on something especially something illegal or illicit such as narcotics or human beings (Black's Law Dictionary, 2019). Webster Dictionary defined the word to mean buying or selling or exchanging something and described it as illegal trade in human beings especially for forced labour or prostitution (Black's Law Dictionary, 2019). The same meaning is given by Oxford Dictionary (Oxford Dictionary, 1989). What Isabella did is without doubt a crime, indeed trafficking and slavery at its highest level (Abonyi, 2019, 2022).

iv. Inhuman and Degrading Treatment:

Inhuman and degrading treatment refers to treatment or punishment that is cruel in nature, it is done without sense of humanity or is degrading such as physical or mental abuse or the infliction of unnecessary suffering (Black's Law Dictionary, 2019). According to Anushiem, (2017); Iloka and Nwakoby (2025), the treatment reduces the victim to nothing and in the thinking of a reasonable man, the person so treated has been subjected to treatment that places him in agony and suffering such that he or she looks himself or herself as nothing.

v. Forced Labour:

Nonyem and Chimaa (2020), Ojimba, (2020) noted that, where labour or service is carried out threat of punishment or other forms of coercion, such labour is not free but forced. A servant is expected to freely offer his or her services but where services is provided by threat or coercions, then it is no longer a free labour but forced (Merriam Webster's Dictionary, 2020). It may also be suggested that where a person is lured to provide or render service may be subtly by promise of unwanted reward or promise of pleasure and the victim accepts against his/her wish but as a result of the rewards promised, it also amounts to forced labour because it is not free. However, it is interesting in the consideration of this concept to make a point clear which, according to Ojimba, (2024); Okeke, Okaforcha, and Ekwesianya, (2019), may be regarded as "forced labour" in one society may not be seen as so in other climes and to this extent cultural background orientation determines to a great extent how and what a people cal forced labour and what is not. Azubuike, (2024); Okoye (2021) observed that, in Africa, owing to our cultural backgrounds the concept of Igbo traditional of "Igba Boyi" a "vocational training entrepreneurial scheme" among the Igbos where a boy leaves his parents and stay with his master for a period of years as may be agreed to learn a trade is completely not a

forced labour nor is it slavery in Africa among the Africans, but in the west, the story may not be the same as the master may be held for slavery. Similarly, there are instances where in traditional African Societies where parents send out their children as "maids" and "errand boys" to their relatives outside their community ad every country as a way to pay back for the assistance rendered to them by their brothers who occupy strategic position in the society. As noted by Ezeaku, and Okoye (2025); Osegbue (2022); Ibe, (2019), among the Africans, such practice is not slavery at all but in the west, the mere fact that such a maid or errand boy is in the house of such "uncle" "cousin" or aunt rendering and offering some domestic services without any consideration in the form of payment of entitlement or salary has made the whole thing forced labour and slavery, this even where the supposed "slave master" never asked for the victim to com and serve him or her as maid. It is observed that Isabella's case is far from the African traditional concept of brothers helping their kinsmen or the "Igba-Boy" the "apprentice scheme" among ibos in Nigeria, the case of Isabella's victims is far from this concept.

All the considerations above raise issues as to whether the conviction of Ekweremadu over the alleged treatment of the "boy victim" the conviction of Judge Lydia and Isabella over treatment of their victims is one of cases trafficking and modern slavery. With respect the case of Lydia and Isabella is a combination of slavery and trafficking while the case of Ekweremadu is one mainly with ingredients of trafficking for purposes of organ removal.

Applicable Laws Against Trafficking and Modern Slavery in Ghana, Nigeria and United Kingdom

As noted by Anushiem, (2022); Obumse, (2022) and Ofozoba (2020), in different jurisdictions all over the world, laws have been put in place against slavery, destitution and trafficking in persons. This, according to Nwakoby and Iloka (2025); Osegbue (2021), is because the crime of modern slavery and trafficking is among the transnational crimes that are rapidly spreading across the globe after drug trafficking and money laundering and terrorism activities.

According to Okaforcha, and Iloka (2025); Ekwesianya, (2022), in England and indeed in most countries in Europe, Laws have been put in place to address the menance of modern slavery which has connection with the cross-border crime of trafficking. Similarly, among the African states especially Nigeria and Ghana, a good number of laws have been enacted both at the level of the central government and by governments of some states out of the 36 states of Nigeria. These laws and conventions are highlighted below:

i. The Applicable Laws in United Kingdom:

The following laws exist in the United Kingdom and prohibit the crime of Modern Slavery and have been consistently applied in the region to address the menance of the crime.

a) The Modern Slavery Act of 2015:

This Act consolidated previous laws criminalizing slavery and trafficking for all forms of exploitation. Precisely, section 1 of this Act prohibits the act of slavery, servitude and forced or compulsory labour. When we talk about slavery, we understand it already to mean a condition in which one is controlled such that he has no will of his or her own but rather his or her will is determined by another under whose control the person is. This foregoing Section 1 of the Act also prohibit forced or compulsory labour which more or less is a situation where the victim is compelled to do a kind of work or provide a type of service against his/her wish and is made to do it whether he or she likes it or not.

Section 2 of the Act reviewed prohibits human trafficking including recruitment, transportation, transfer harboring or receipt of persons by means of threat, force coercion, abduction, fraud, deception or abuse of power.

Going by Section 2, once a person is transported, transferred from one place to another and received by coercion, threat, fraud, deception or abuse of power, it amounts to slavery and amounts to human trafficking.

Under Section 4, a person may commit offence with intent to commit offense of trafficking of person under Section 2 of the Act and hence the first crime leads to the other, for example abducting or kidnapping a person for purpose of trafficking him eventually.

There are other relevant laws in United Kingdom relating to Modern Slavery and trafficking in persons. They are:

b) The Asylum and Immigration (Treatment of Claimants etc) Act of 2004:

This Act prohibits trafficking for labour and other forms of exploitation.

c) The Sexual Offence Act, 2003:

This Act prohibits trafficking of persons for purposes of sexual exploitation.

d) The Youth Justice and Criminal Evidence Act 1999:

This law is enacted to mainly provide special measures for vulnerable witnesses including victims of modern slavery. The above law demonstrates UK's commitment to combating modern slavery and trafficking in the region and beyond.

ii. Applicable Law in Nigeria:

In Nigeria, there are laws put in place to address the issue related to slavery and trafficking in persons which are crimes seen and recognized as cruel punishment and degrading punishment.

The laws include the following:

a) The 1999 Constitution of the Federal republic of Nigeria as Amended in 2023:

The Constitution of Nigeria is the Supreme and organic law of the land and by Section 1 (3) of the Constitution, any law inconsistent with the constitution with the constitution is to the extent of its inconsistency with the constitution void. By Section 34 (1) (a) (b) and (c) of the said constitution, every individual citizen of Nigeria shall be entitled to respect for the dignity of his person and accordingly no person shall be subjected to torture, or to inhuman or degrading treatment, no person shall be held in slavery and servitude or be required to perform forced or compulsory labour, however forced or compulsory labour prohibited by the constitution shall not include all forms of labour listed under section 34 (2) (a) (b) (c) (d) (e) (i-iii) of the same constitution.

From the above, no person shall be held in slavery or servitude nor be subjected to forced or compulsory labour save as may be permitted under the relevant subsection of Section 34 (2) of the constitution reviewed which means that service in the Police force, Nigerian armed forces as well as National Service like NYSC does not include forced or compulsory service within the provisions of the Nigerian Constitution.

b) The National Agency for the prohibition of Trafficking in Persons and other Related Offences Act of 2015 (NAPTIP ACT): This is Act enacted by the National Assembly of Nigeria and prohibits the crime of trafficking in persons. The Act established the NAPTIP as a multi-disciplinary crime fighting agency and empowered the agency to administer the Act and implement and enforce its provisions by investigating any complaint or report relating to trafficking activities in any part of Nigeria. Interestedly, the Act also prohibited trafficking in person for purposes of organ

removal or harvesting precisely under Section 20 of the Law. The Agency has in collaboration with other agencies and institutions in Nigeria investigated and prosecuted various cases of trafficking reported to it.

c) Edo State Law Against Trafficking, Prohibition of Prostitution and Related Offences 2003: The Edo State is one among the states that pioneered the enactment of law prohibiting trafficking and prostitution. This law was enacted in 2003 and has passed through amendment owing to the increasing incidence and cases of teenage girls in the state travelling and being lured to travel overseas especially Italy in search of greener pasture and white-collar jobs. Some of them left the state through illegal and irregular are means and many ended up being victims of trafficking, forced labour, prostitution, sex trade and some paid the supreme price in the process. This gave rise to the enactment of the law.

iii. Applicable Law in Ghana:
The applicable laws in Ghana against trafficking and modern slavery include among others the following:
a) Human Trafficking Act (694) 2005 which criminalized trafficking and prescribed offences.
b) The constitution of Ghana which prohibits slavery, forced labour and human trafficking.

iv. There are some international instruments that aim to prevent and combat modern slavery and trafficking. These instruments are highlighted below.

a) Universal Declaration of Human Rights 1948, precisely, Article 4 of the Declaration prohibits slavery and the slave trade all over the globe.
b) International Covenant on civil and Political Right 1966:
This convention prohibits slavery, slave trade and forced labour under its Article 8 and makes then a crime.
c) Convention on the Elimination of All Forms of Discrimination Against Women, 1979:
By Article 6 of the Convention, trafficking in women is prohibited whether for prostitution or for sex trade.
d) Convention on the Rights of the Child:
Article 35 of the convention prohibits the sale, trafficking and abduction of children.
e) Protocol to prevent, suppress and punish Trafficking in persons, especially Women and Children (Also known as Polemo Protocol):
This protocol supplements the Convention Against Transnational Organized Crimes and aims to prevent and combat trafficking.

f) The ILO (International Labour Organization Instruments):
The ILO has many instruments which are important towards addressing the issue of trafficking, forced labour and even slavery practices. They are:
i. Forced Labour Convention 1930 which prohibits forced labour in all forms.
ii. Abolition of forced labour convention 1957, this convention prohibits and calls for immediate and complete abolition of forced labour.
iii. Worst forms of Child Labour Convention 1999, it prohibits the worst forms of child labour including trafficking and forced labour.
iv. Domestic Workers Convention 2011, the Convention provides protection for domestic workers including the vulnerable groups.

Other conventions include the:

1. European Convention on Action Against Trafficking in Human Beings 2005 which prevents and combat trafficking in human beings.
2. Council of Europe Convention on Cybercrime 2001, which prevent and combat cybercrime including online trafficking.
3. The African Convention for Protection of IDPs (Kampala Document) 2009: The Convention protects IDPs and those vulnerable to trafficking.

There are also other regional instruments like:

a) Association of Southeast Asian Nations Convention Against Trafficking in Persons, Especially Women and Children 2015 (prevents and combats trafficking in ASEAN Member State or States).

b) European Union Anti-Trafficking Directive 2011: Prevents and combats trafficking within European Union.

Reviewing The Case and Conviction of Isabella in Ghana

Nicky Isabella, a 22 years old Nigerian Hairdresser was convicted by a Circuit Court in Achimota Ghana for offence of trafficking and conspiracy to commit crime by luring two young Nigerian Women Grace and Kekilomo 23 and 22 years respectively to travel to Ghana with a promise to provide them job in a supermarket. However, on arrival, Isabella forced the duo into prostitution and started seizing the victim's earnings from the inhuman and risky trade.

Every case is decided on its own merit and circumstances and facts of the case in question. In reviewing this case, it is interesting to consider the following:

1. Under which laws was Isabella convicted?
2. Was there a contract between Isabella and the two women victims to work as prostitutes before moving to Ghana or for something else?
3. Is the action of Isabella in forcing the victims to prostitution against their wish and against promise to provide them work in the supermarket and seizing their earnings not inhuman to amount to slavery?

First Isabelle was found guilty under several laws related to Modern Slavery and trafficking in Ghana including the Ghana's constitution, luring the victims from Nigeria under pretence and promise of enjoyment is a crime. Forcing the victim to prostitution against their wish then employment agreed and promised amounts to forced labour prohibited by Ghana's constitution. The false pretence was to exploit them by making them to be prostitutes and also using her power and position to silence them from reporting to state institution of the abuse. Whatever the evidence before the court may have been, the understanding is that Isabella brought the women to work in supermarket under false pretence with a different intention of exploiting them in prostitution, not only that they are paid for their services by proxy through Isabella, she seizes the earnings, this is exploitation in its highest realm.

Nonetheless, Onyekwelu (2024); Adinna and Onyekwelu, (2021) explained that, if the victims are entitled to "wage" for service rendered by them, collecting their earnings by proxy and unlawfully seizing it amounts to exploitation. It is noted that Isabella's conviction has contributed significantly to Ghanaian legal history and Africa legal jurisprudence in trafficking in persons and the envisaged achievements are (i) it strengthened anti-trafficking laws in Ghana, (ii) is a precedent to future cases and serve as deterat to potential offenders, it also enhances support for victims as it relates to their

rescue and rehabilitation and improved coordination and collaboration between law enforcement agencies.

The conviction is connected to modern slavery especially because of the elements of exploitation of Isabella's victims. The elements of servitude, forced labour confirms the connection of the crime of Isabella to modern slavery.

The similarity between the conviction of Isabella and Judge Lydia Mugambe is the fact that the act of the two offenders is connected to modern slavery. Both offenders used their positions to exploit the victims. However, the UK Court came hand on the Judge because of her exalted position and for the need for law to be respected irrespective of status, however, the Achimota Court considered the age of Isabella and the fact that she is a first offender but came hard on her because the court felt and saw it that Isabella did not have remorse for what she did.

Challenges Of Prosecuting and Holding Perpetrators of Modern Slavery and Trafficking Accountable in Ghana

Many challenges exist in UK, Ghana and Nigeria in prosecuting and bringing perpetrators of modern slavery and trafficking accountable in the jurisdictions.

In the UK, the challenges ranges from the following:

1. Lack of Awareness and understanding:

Modern Slavery is surrounded in secrecy. Slavery and trafficking can be hidden in plain sight making difficult for authorities to identity and prosecute, sometimes members of family are part of the syndicate.

2. Modern Slavery cases are complex and witnesses may be reluctant to come forward and testify including the victim.
3. Threat to victim and Reluctance to testify, sometimes the victims are threatened by perpetrators and to testify and help security institution.
4. Lack of funding and resources:

Prosecuting modern slavery and trafficking is not easy task, funding, expertise and personnel are material and fundamental.

5. Cultural and language Problems:

Victims may come from different cultural backgrounds and language communication may hinder communication and gathering or even evaluating evidence.

In Nigeria, the challenges are:

1. Limited Awareness and Understanding.
2. Corruption and Lack of Trust among and in law enforcement agencies thus investigation and prosecution are hindered.
3. Limited Resources and Infrastructure.

In Ghana, the challenges range from:

1. Lack of awareness on trafficking in human being
2. Lack of funding of programmes and policies against trafficking.
3. Corruption among the citizens.

Recommendations

The following recommendations are made to address the menance of modern slavery and trafficking not only in UK, Nigeria and Ghana but globally.

1. Strengthening Laws and Policies by enacting and enforcing anti-trafficking laws in these jurisdictions to close gaps and windows for escape by perpetrators. Institutions must also be strengthened because even if good laws are enacted but there are no strong but weak institutions, no success will be achieved. In Nigeria, most institutions are weak and lack capacity to deliver government policies especially the good policies.
2. Ratification and domestication of Conventions related to Modern Slavery and Trafficking is

sacrosanct to implement such conventions at domestic level such as the Palemo Protocol and ILO Forced Labour Protocol and other instruments.

3. It is important that Governments Develop National Action Plan.
4. Cultural and Social Norms:

Some cultural practices and norms in our society especially Nigerian may perpetuate or tolerate Modern Slavery or trafficking for example the concept of Igbo enterprise Scheme "Igba-Boyi" or the practice of parents releasing their children to stay with "unless" and "Aunty" as pay back for previous assistance.

5. Porosity of Borders, this is a serious problem in Nigeria and it paves way for trafficking and illegal migration leading to forced labour and slavery.
6. Other challenges are victim protection and support which is lacking, international co-operation is absent but necessary to fight modern slavery and trafficking as well as absence of data collection and analysis over number of victims and other issues on modern slavery and trafficking so as to adopt viable solutions and measures to address the menace.
7. There is also need to improve victim support and come up with modern support solutions and schemes to re-establish the victim and re-integrate them into the society after the exploitation through education and economic schemes towards self-reliance.
8. Protect victim's rights through increased access and window for justice, this is achievable through advocacy, sensitization and awareness and preventive support programmes by governments and non-governmental agencies.
9. Collaboration with civil society coalitions and integrated international co-operation through international framework like UN Sustainable Development Goals(SDGS) improve data collection, utilizing data information, data analysis, support of industry and business initiatives, enacting legislation in modern slavery in business and in training and supply chains and training for law enforcement official supporting capacity training for judge and prosecutors over slavery and trafficking, training social workers etc.
10. Training and Retraining of Personnel in these jurisdictions and forming linkages like training of security personnel of both countries judges and prosecutors to improve sentencing guideline, intelligence gathering etc.

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