

# Protecting Victims of Human Trafficking: Harmonizing the Implementation of the Palermo Protocol in Indonesia and Nigeria

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## ABSTRACT

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Human trafficking remains a persistent transnational crime in many developing countries, notably Indonesia and Nigeria, where structural poverty and limited human-capital opportunities contribute to vulnerability. This study comparatively examines how both countries have incorporated the Palermo Protocol into their national legal and institutional frameworks and evaluates the effectiveness of victim-protection measures. Employing a normative-comparative design with descriptive qualitative analysis, the research reviews primary legislation and implementing regulations (notably Indonesia's Law No. 21/2007 on the Eradication of Trafficking in Persons and related implementing regulations, and Nigeria's Trafficking in Persons (Prohibition) Enforcement and Administration Act (TIPPEA), revised 2015) alongside institutional arrangements such as Indonesia's inter-agency task force and LPSK, and Nigeria's National Agency for the Prohibition of Trafficking in Persons (NAPTIP). Findings indicate both states have formally aligned domestic law with Palermo principles and established dedicated institutions, yet practical effectiveness is constrained by uneven inter-agency coordination, resource shortfalls, administrative barriers to restitution/compensation, and socio-economic and cultural vulnerabilities. The study concludes that legal harmonization must be matched by strengthened institutional capacity, simplified access to victim remedies, sustained funding, and community-level interventions to translate international standards into meaningful protection for victims.

## 1. Introduction

Human trafficking is one of the most tragic crimes against humanity and is no longer a rare phenomenon in the modern world. This crime not only involves violations of the law, but also touches on the core issues of human dignity and freedom (Evingrum et al., 2019; Malah & Asongu, 2021; Naibaho, 2023). These acts also leave lasting scars on the victims, who have lost control over their bodies, their choices in life, and their futures (Al-Tammemi et al., 2023; Ogunniyi & Idowu, 2022). Sadly, even though the international community has long sought to agree on legal instruments to combat this crime, the practice of human trafficking continues and shows increasingly sophisticated and organized patterns (Okech et al., 2025; Ornelas et al., 2023; Sweileh, 2018).

Indonesia itself is one of the countries still struggling with the issue of human trafficking, where the victims who are vulnerable to this act are women and children (Ariadne et al., 2021; Gunawan et al., 2022; Naibaho, 2023). This certainly has a background that can be seen from the high level of

population mobility, as well as social and economic inequalities, including high poverty rates, lack of education, lack of employment opportunities, and the lure of job offers to trap victims into exploitation networks. Furthermore, Indonesia's strategic geographical location makes it vulnerable as a country of origin, transit, and destination for human trafficking (Oktavian, 2024; Sari, 2021, 2025).

Based on existing law, Law No. 21 of 2007 concerning the Eradication of Criminal Acts of Trafficking in Persons (Human Trafficking Law) explains that trafficking in persons is defined as a series of acts of recruitment, transportation, transfer, abduction, confining, abuse of power or position of vulnerability, or giving payments or benefits to obtain the consent of a person having control over the victim, whether within the country or across borders, for the purpose of exploiting or causing a person to be exploited. This definition clearly shows that human trafficking is not a single crime, but rather an organized crime involving various forms of abuse of power and human vulnerability (Naibaho, 2023; Sinaga, 2024; Zulfiani et al., 2025).

The main purpose of human trafficking includes various forms of serious exploitation of human rights, ranging from sexual exploitation, slavery or slavery-like practices in the form of forced labor, to organ harvesting (Eviningrum et al., 2019; Malah & Asongu, 2021; Ogunniyi & Idowu, 2022; Sari, 2025). Children and women are often the most vulnerable to this crime due to their limited economic resources. Children are often forced to work in dangerous conditions, deprived of their right to education and proper growth and development, and often experience physical and mental violence that has a long-term impact on their health and future (Ariadne et al., 2021; Gunawan et al., 2022). Meanwhile, women are also often easy targets for sexual exploitation and forced labor due to gender inequality and economic pressure (Emerinwe et al., 2020; Ornelas et al., 2023).

The phenomenon of human trafficking has its roots in the practice of slavery that has existed since ancient times. However, as modern society has developed, this practice has undergone a transformation into a more hidden, organized, and complex form of crime. Not only that, this crime often uses various methods to manipulate victims, ranging from offering high wages and comfortable working facilities to sending migrant workers without official documents, making it increasingly difficult for the law to deal with in general (Ariadne et al., 2021; Naibaho, 2023; Sweileh, 2018; Zulfiani et al., 2025).

Empirical data in Indonesia shows that women and children still dominate the number of victims of human trafficking. The Ministry of Women's Empowerment and Child Protection (KemenPPPA) notes that more than half of the victims of human trafficking in Indonesia are women. This can be seen based on data collected by the Online Information System for Women and Child Protection (SIMFONI PPA) from 2021 to June 2025, which recorded that there were 1,204 adult women and 1,003 girls who were victims of human trafficking, while the number of boys was 131. This clearly reflects the seriousness of the issue of human trafficking in Indonesia (KemenPPPA, 2025).

The phenomenon of human trafficking is not only a national problem, but also a global problem experienced by several countries (Al-Tammemi et al., 2023; Sweileh, 2018). This is the case in West Africa, particularly Nigeria, which is known as one of the countries with a high rate of human trafficking, both as a country of origin and transit (Mika'il & Muhammad, 2020; Ogunniyi & Idowu, 2022; Okeshola & Adenugba, 2018). Similarly, in Indonesia, women and children are often easy targets for human trafficking for the purposes of sexual exploitation or forced labor (Ariadne et al., 2021; Gunawan et al., 2022; Uzochukwu, 2021). The high vulnerability of women and children to human trafficking in Nigeria can be seen based on international empirical data compiled by the Global Slavery Index (2023) in 2023, which estimates that in 2021, approximately 1.6 million people were living in modern slavery in Nigeria. This figure is equivalent to 7.8 people per thousand inhabitants, which shows an alarming prevalence rate. When viewed from a regional perspective in Africa, Nigeria ranks 5th out of 51 countries in terms of the prevalence of modern slavery, while on a global scale, Nigeria ranks 38th out of 160 countries.

Both countries show that human trafficking and exploitation are part of illegal economic activities that benefit the perpetrators but are very detrimental to the rights of the victims. Efforts to protect victims of human trafficking have been formulated in the context of comprehensive international law through the Protocol to Prevent, Suppress and Punish Trafficking in Persons,

Especially Women and Children, also known as the Palermo Protocol. This Protocol was adopted by the United Nations (UN) in 2000 as a supplement to the United Nations Convention against Transnational Organized Crime (UNTOC). The Palermo Protocol also affirms that human trafficking is a transnational crime that requires strong international cooperation, with human rights as the main foundation for its implementation (Goździak & Vogel, 2020; Gunawan et al., 2022; Shah, 2025; Suchecki, 2019).

The most important aspect of the Palermo Protocol is its emphasis on protecting victims, especially women and children. This Protocol mandates that signatory countries ensure that victims are treated with respect and dignity, by providing them with access to justice and rehabilitation and social recovery services equipped with adequate facilities (Gunawan et al., 2022; Shah, 2025; Suchecki, 2019). Indonesia itself has responded to international commitments by ratifying Law No. 21 of 2007 (Human Trafficking Law), which serves as the main legal basis for handling human trafficking in Indonesia and comprehensively regulates definitions, criminal sanctions, and protection for victims. However, in practice, the implementation of legal protection for victims still faces several obstacles, such as the limited capacity of law enforcement officials, suboptimal coordination between agencies, and the lack of sustainable recovery services for victims (Ariadne et al., 2021; Naibaho, 2023; Oktavian, 2024).

Despite having a national legal framework and specialized agencies such as the National Agency for the Prohibition of Trafficking in Persons (NAPTIP), Nigeria also faces similar problems in effectively implementing victim protection. Starting from differences in institutional capacity, socioeconomic conditions, and political stability, these factors influence the effectiveness of law enforcement and victim protection in the country (Ishola & Olumuyiwa, 2024; Kehinde, 2025; Ogunniyi & Idowu, 2022). This shows that legal instruments alone are not enough without consistent and victim-oriented implementation. Departing from the gap between legal systems, this study examines the alignment of the Palermo Protocol's implementation through a comparative study of Indonesia and Nigeria. This research offers a perspective that highlights implementation issues and opportunities for legal harmonization, and is expected to contribute to strengthening more humane legal protection for victims of human trafficking.

## 2. Methods

This study uses a normative-comparative legal approach to examine the forms and mechanisms of legal protection for women and children who are victims of human trafficking in Indonesia and Nigeria with reference to the Palermo Protocol (Negara, 2023). The primary legal materials are international legal instruments such as the Palermo Protocol and UNTOC, as well as Indonesian and Nigerian national laws and regulations related to human trafficking, such as Law No. 21 of 2007 concerning the Eradication of Human Trafficking (Human Trafficking Law), and applicable legal provisions in Nigeria, such as NAPTIP and the Trafficking in Persons (Prohibition) Enforcement and Administration (TIPPEA) Act 2003. Secondary legal materials were obtained from scientific journal articles and relevant national and international agency reports (Benuf & Azhar, 2020).

Materials collection was conducted through a literature study by searching various legal sources and related literature (Cheong et al., 2023). The collected materials were analyzed using qualitative-descriptive analysis techniques by describing, interpreting, and systematizing legal provisions logically and systematically (Wahyudi et al., 2025). This analysis aims to explain the process of adopting and implementing the Palermo Protocol norms in the legal systems of Indonesia and Nigeria, as well as to identify the challenges and opportunities for harmonizing legal protection for women and children who are victims of human trafficking.

## 3. Results and Discussion

### 3.1. Implementation of Protection for Victims of Human Trafficking in Indonesia

Implementation of protection for victims of human trafficking in Indonesia is rooted in a normative framework under the umbrella of Law No. 21 of 2007 concerning the Eradication of Criminal Acts of Trafficking in Persons (Human Trafficking Law) and reinforced by the ratification of the United Nations Convention against Transnational Organized Crime (UNTOC) and the Protocol to Prevent, Suppress and Punish Trafficking in Persons (Palermo Protocol) through Law No. 14 of 2009

(Naibaho, 2023; Wahyuni, 2019). In principle, the Human Trafficking Law places victims as subjects of rights who are entitled to restitution, compensation, rehabilitation, and legal assistance. The ratification of UNTOC adds international legitimacy so that national policies are directed at prevention, enforcement, protection, and cross-border cooperation in accordance with Palermo Protocol standards (Ariadne et al., 2021; Evingrum et al., 2019; Oktavian, 2024). This framework marks a shift from a purely criminal approach to a holistic victim rights model.

Operational implementation of victim protection in Indonesia involves various implementing instruments: Government Regulation No. 35 of 2020 (*Peraturan Pemerintah/PP No. 35 of 2020*) and Supreme Court Regulation No. 1 of 2022 (*Peraturan Mahkamah Agung/Perma No. 1 of 2022*) as technical regulations related to compensation and restitution mechanisms and procedures for handling witnesses and victims (Ali et al., 2022; Ardiansyah et al., 2025; T. Hidayat et al., 2022). At the institutional level, the Witness and Victim Protection Agency (*Lembaga Perlindungan Saksi dan Korban/LPSK*) is given a key role in ensuring victims' access to protection during the judicial process and compensation claims (Baehaki & Hadis, 2023; Fahmi, 2025), while inter-ministerial task forces serve to coordinate inter-sectoral policies to provide integrated services for victims (Farisin & Fazha, 2025; Susilawati et al., 2024).

In practice, the state provides medical services, psychosocial rehabilitation, shelters or safe houses, trauma counseling, and socio-economic reintegration programs, often in collaboration with civil society organizations (Fallo et al., 2025; Saffanah et al., 2024; Surtees, 2017). For child victims, implementation emphasizes the principle of the best interests of the child and the fulfillment of the right to education and protection from social stigma (Fahmi, 2025). However, the implementation of these services still varies between regions. The central government has issued implementing regulations, but the capacity of officials in the field, including the availability of shelters and professionals, is the main determinant of the quality of victim recovery at the local level.

Administrative and information constraints pose serious obstacles: many victims are unaware of the mechanisms for filing compensation/restitution claims, thereby limiting their access. Several empirical studies show that ignorance of compensation rights, complicated administrative processes, and the limited capacity of the LPSK in the regions have resulted in low compensation realization despite the existence of legal frameworks such as PP No. 35 of 2020 and Perma No. 1 of 2022 (Ali et al., 2022; Ardiansyah et al., 2025; Ardin & Harefa, 2021; Sinaga, 2024). These findings emphasize that the availability of formal regulations does not automatically translate into actual access without intervention in the form of socialization, simplification of procedures, and capacity building at the regional level.

Law enforcement also poses challenges, law enforcement officials often find it difficult to understand the characteristics of organized and cross-border human trafficking crimes, including techniques of evidence gathering and the application of trauma-informed approaches when interacting with victims (Chambers et al., 2022). Therefore, integrated training for investigators, prosecutors, and social service workers is essential to ensure that the judicial process does not add to the burden on victims. Empirical evidence from several previous studies also highlights the need for a training approach that combines various aspects such as forensics, psychosocial, and legal aspects so that case handling becomes more responsive to the needs of victims (Kinnish & Hopper, 2024; Saffanah et al., 2024; Twis et al., 2025).

Overall, Indonesia's legal framework is relatively comprehensive, but its implementation has been uneven—mainly due to coordination issues, disparities in capacity between regions, and administrative barriers that hinder access to compensation and rehabilitation services. Practical recommendations emerging from empirical studies include the need for a “one-stop shop” service model at the provincial level, digitization of the compensation application process, and capacity building for the LPSK through budgetary support and human resource development programs. Without administrative and local capacity improvements, regulations such as the Human Trafficking Law and Government Regulation No. 35 of 2020 will not fully guarantee the recovery of victims as intended in the Palermo Protocol.

### **3.2. Implementation of Protection for Victims of Human Trafficking in Nigeria**

The victim protection framework in Nigeria is based on the Trafficking in Persons (Prohibition) Enforcement and Administration Act (TIPPEA), which underwent significant revisions in 2015, as well as the ratification of the Palermo Protocol in 2001. TIPPEA formalizes the definition of trafficking, types of exploitation, punishment mechanisms, and victim protection provisions (Amune, 2025; Ogunniyi & Idowu, 2022). Its implementation is operated by the National Agency for the Prohibition of

Trafficking in Persons (NAPTIP), a centralized agency with a comprehensive mandate ranging from prevention and enforcement to the rehabilitation and reintegration of victims. An institutional model that focuses on a single operational body is characteristic of Nigeria's response to the phenomenon of trafficking, in contrast to the multi-agency coordination approach in several other countries (Bello & Okonjo, 2025; Ishola & Olumuyiwa, 2024; Kehinde, 2025).

NAPTIP operates shelters and basic services such as medical care, psychological support, counseling, legal assistance, and skills empowerment programs to support the economic independence of victims (Idemudia et al., 2021; Ishola & Olumuyiwa, 2024; Kehinde, 2025). Partnerships with civil society organizations, religious institutions, and international partners strengthen service coverage, especially in areas that are underserved by the government (Agwu, 2025; Ramli et al., 2025; Uduji et al., 2019). Empowerment programs are a critical aspect given that poverty and unemployment are structural factors that drive vulnerable migration and facilitate recruitment by trafficking syndicates (Adelakun et al., 2025; Nwosu et al., 2022); thus, economic interventions must be part of the protection package (Agwu, 2025; González, 2024; Okeshola & Adenugba, 2018).

Although centralized institutions provide clarity of command (Demerew et al., 2025), Nigeria's biggest challenge is limited resources, where inadequate operating budgets, a shortage of professionals, and uneven infrastructure mean that many victims (especially in remote areas) do not receive adequate services. Research by Okorie & Okeja (2024) found that fiscal constraints and a shortage of professional staff hamper the effectiveness of NAPTIP; their recommendations emphasize increased funding, specialized training, and functional decentralization strategies so that services can reach the most vulnerable states.

The security situation in a number of areas, particularly areas of armed conflict (Aja, 2024), adds to the operational complexity of NAPTIP and its humanitarian partners. The safety risks faced by officers and victims make it difficult to reach and evacuate victims. In addition, socio-cultural barriers such as stigma against victims of sexual exploitation have serious implications for social reintegration—many victims face rejection from their communities or even their families (Uzochukwu, 2021). A study by Emerinwe et al. (2020) notes that stigma perpetuated by traditional norms prolongs trauma and reduces victims' willingness to report, making anti-stigma programs and the involvement of local leaders important in dismantling social patterns that reinforce revictimization.

To overcome implementation barriers, Nigeria relies on a combination of efforts, namely strengthening the capacity of NAPTIP (through international cooperation), developing additional shelter networks by NGOs, and economic empowerment programs for victims (Ukhami et al., 2024). However, the federal system has led to inconsistencies in implementation (Demerew et al., 2025), with some states able to support NAPTIP's operations while others rely on the center. Empirical recommendations from Ishola & Olumuyiwa (2024) encourage financial and technical incentive mechanisms for states to increase local capacity, as well as the establishment of special security protocols for operations in conflict areas to ensure that victim protection remains possible.

### 3.3. Harmonization of the Palermo Protocol in the Constitutional and National Regulations

Harmonizing the Palermo Protocol with national norms is a process that involves constitutional and sectoral legislative adjustments. In Indonesia, this harmonization is carried out through the recognition of human rights protection principles in the 1945 Constitution, particularly Article 28A (right to life), Article 28B paragraph (2) (protection of children from violence and discrimination), Article 28D (right to legal protection), and Article 28G (the right to security) (Anggraini, 2024; Wahyudi et al., 2025). Ratification of the UNTOC/Palermo Protocol through Law No. 14 of 2009 strengthened the international foundation, which was then internalized into the Human Trafficking Law and various implementing regulations such as Government Regulation No. 35 of 2020 and Supreme Court Regulation No. 1 of 2022 so that international standards could be implemented domestically (Gunawan et al., 2022; Naibaho, 2023; Oktavian, 2024; Solim, 2019).

In Nigeria, the integration of the Palermo Protocol is combined with constitutional principles enshrined in the 1999 Constitution of the Federal Republic of Nigeria, which affirms human dignity and prohibits forms of exploitation such as slavery and forced labor. The ratification of the Palermo Protocol and the drafting of the revised TIPPEA (2015) demonstrate efforts to harmonize international norms with the national legal framework; its implementation is centered through NAPTIP so that the

functions of prevention, enforcement, and protection are consolidated into one agency to facilitate national coordination (Bello & Okonjo, 2025; Kehinde, 2025; Ogunniyi & Idowu, 2022; Okoye et al., 2025).

Although the objectives of harmonization are similar, namely prevention, law enforcement, victim protection, and international cooperation, the two countries have chosen different strategies. Indonesia has opted for vertical harmonization and regulatory diversification (many derivative regulations and coordination mechanisms such as task forces), while Nigeria has chosen more focused harmonization through a comprehensive law (TIPPEA) and a special institution (NAPTIP). This choice is influenced by differences in government systems: Indonesia has a unitary system with administrative decentralization, while Nigeria is federal, so a centralized approach is considered more practical for national coordination (Demerew et al., 2025; Nugroho & ., 2021).

From an implementation perspective, harmonization faces sub-national structural barriers, where disparities in capacity between regions in Indonesia hinder the implementation of implementing regulations (Nugroho & ., 2021). In Nigeria, federalism and resource disparities between states give rise to significant variations (Demerew et al., 2025), which certainly affect the effectiveness of victim response. Research by Hidayat et al. (2024) shows that formal harmonization must be accompanied by local adaptation mechanisms, such as flexibility in standard operating procedures that allow service models to be tailored to regional conditions, so that international norms do not merely become legal texts but also feasible practices in the field.

Harmonization of the Palermo Protocol is effective when carried out in two directions: (1) adjusting national regulations to meet international standards; and (2) operational adaptation at the sub-national level to overcome capacity, cultural, and security constraints. This requires a combined strategy, strengthening national regulations (laws and implementing regulations), strengthening institutions (LPSK and NAPTIP), and local capacity programs, as well as continuous evaluation involving survivors and civil society organizations so that harmonization truly results in concretely measurable protection for women and children victims.

### 3.4. Comparison and Recommendations on Palermo Protocol Implementation

Indonesia and Nigeria show fundamental similarities: both have ratified the Palermo Protocol, adopted definitions of trafficking that are in line with international protocols, and prioritized the protection of women and children in their policies. Indonesia strengthens protection through the Human Trafficking Law and implementing regulations such as PP No. 35 of 2020 and Perma No. 1 of 2022, while Nigeria regulates this area with TIPPEA 2015 and the NAPTIP institution. Institutional differences and socio-economic contexts are determining factors in the differences in implementation achievements.

**Table 1.** Comparison of the Implementation of the Palermo Protocol: Indonesia vs. Nigeria

Aspects	Indonesia	Nigeria
Legal framework	Law No. 21 of 2007; Ratification of UNTOC/Palermo Protocol via Law No. 14 of 2009; Government Regulation No. 35 of 2020; Supreme Court Regulation No. 1 of 2022; and Government Regulation No. 7 of 2018.	TIPPEA (2015 revision); Ratification of the Palermo Protocol (2001); and Constitution of the Federal Republic of Nigeria 1999.
Institutional model	Inter-ministerial task force and LPSK as witness and victim protection agencies, as well as collaboration with NGOs.	Centralized agency: NAPTIP combines prevention, enforcement, rehabilitation; as well as complementary NGOs and international partners.
Strengths	Various regulatory and constitutional frameworks (Articles 28A, 28B(2), 28D, 28G of the 1945 Constitution), and implementing regulations.	Centralized coordination and clear operational mandates through NAPTIP; as well as a focus on shelter operations and prosecution.
Weaknesses	Suboptimal interagency coordination,	Budget and staffing constraints,

Focus of intervention needed	disparities in capacity between regions, and information on access to compensation. Simplification of access to compensation (Government Regulation No. 35 of 2020, Supreme Court Regulation No. 1 of 2022), digitization of the LPSK, and strengthening of regional capacity.	inconsistencies between states (federal), security conditions, and local stigma. Increased funding for NAPTIP, functional decentralization to states, and protocols for operations in conflict zones.
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To harmonize the implementation of the Palermo Protocol between the two countries, a cross-border strategy that is operational and results-oriented needs to be proposed. First, the development of mutually agreed minimum standards for victim services will help establish a basic service package (medical access, psychosocial support, legal assistance, shelter, economic reintegration, and education for children), thereby facilitating cross-border referrals and donor support. Second, the establishment of a technical exchange mechanism in the form of a bilateral MoU or regional platform can facilitate the exchange of best practices, joint training, and the exchange of non-identifiable data on trafficking modes and routes—a relevant step given the empirical findings of Martin & Runturambi (2024) which emphasize the value of cross-border learning. Third, efforts to synchronize performance indicators so that evaluations between countries can be compared.

Recommendations for Indonesia include several administrative, institutional, and technical measures. Administratively, there is a need to simplify compensation and restitution procedures, directly related to Government Regulation No. 35 of 2020 and Supreme Court Regulation No. 1 of 2022, as well as public information campaigns to raise victims' awareness of their rights. Institutionally, it is necessary to strengthen the LPSK through increased funding, digitization of services, and the establishment of field units in vulnerable provinces so that services are not only centered in the capital. Technically, integrated training based on a trauma-informed approach for law enforcement officials, prosecutors, and social workers is needed so that the law enforcement process does not add to the psychological burden of victims and evidence is collected sensitively (Twis et al., 2025).

For Nigeria, recommendations focus on increasing the capacity of NAPTIP and functional decentralization strategies. Increasing the operational budget and recruiting specialized professionals such as psychologists, social workers, and special investigators for trafficking will improve the quality of shelter and reintegration services. The federal government needs to design technical and financial incentive mechanisms for states so that they can manage shelters and rehabilitation services more independently while still complying with the 2015 TIPPEA standards. In conflict-prone areas, joint operating protocols with humanitarian organizations need to be prepared for the evacuation and protection of victims with guaranteed security. Anti-stigma programs involving religious or traditional leaders are also important to facilitate the reintegration of victims into their communities of origin (González, 2024).

Monitoring, evaluation, and accountability mechanisms are the backbone of ensuring that harmonization does not stop at policy formulation. It is recommended to use standardized performance indicators (e.g., time of first access to services, proportion of victims receiving compensation or restitution, level of reintegration into work or education, and revictimization rates) and independent audits published every two years. The involvement of survivors, NGOs, and academics in the design of indicators and evaluation will increase the relevance of the practice. In addition, the mechanism for the exchange of non-identifiable data as mentioned above must comply with privacy principles so that victims are not exposed, while also providing empirical evidence for policy making.

#### 4. Conclusion

This study shows that both Indonesia and Nigeria have demonstrated their commitment to combating human trafficking by adopting the principles of the Palermo Protocol into their respective national legal frameworks. In Indonesia, a relatively strong legal umbrella, particularly Human Trafficking Law, supported by the ratification of UNTOC/Palermo Protocol and the formation of an inter-ministerial task force, provides a foundation for prevention, enforcement, and victim protection. However, in practice, implementation is still hampered by technical and structural problems: weak

border control, limited resources for law enforcement, the complexity of compensation administration, and the economic vulnerability of communities, which opens the door to exploitation. In Nigeria, although TIPPEA and NAPTIP provide a clear legal and institutional framework, effectiveness in the field is more influenced by conditions of internal conflict, high levels of corruption, socio-political instability, and disparities in capacity between states, making it difficult to optimize law enforcement and victim protection services.

This comparison shows that the success of the Palermo Protocol is not determined solely by the existence of legal norms, but also by institutional readiness, political support, and underlying socio-economic conditions. Therefore, both countries need to intensify inter-agency coordination, strengthen capacity and service delivery (including access to compensation and shelter), and raise public awareness and community involvement to reduce stigma against victims. In addition, supporting measures are needed, such as strengthening resources (budget and human resources), anti-corruption mechanisms, conflict-sensitive approaches in vulnerable areas, and a performance indicator-based monitoring and evaluation system—so that the harmonization of international norms is truly translated into concrete protection for victims, especially women and children.

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