



Human trafficking in the Republics of Kazakhstan, Uzbekistan, and Kyrgyzstan: Lessons from Central Asia

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Abstract. The study aimed to assess human trafficking response strategies in the Republic of Kazakhstan, the Republic of Uzbekistan, and the Republic of Kyrgyzstan, with an emphasis on cross-border cooperation efforts in Central Asia. The goal was achieved through the use of the comparative legal analysis and case study method involving F.M. and others versus Russia and repatriating Kazakh nationals from Myanmar and Thailand in February-April 2025. Based on the comparative legal analysis, it was concluded that all countries in the region had adopted comprehensive rooted in the Palermo Protocol legal frameworks but varied considerably in their implementation strategies. While the Republic of Kazakhstan and the Republic of Kyrgyzstan had formalised national referral mechanisms and partnerships with non-governmental organisations, the Republic of Uzbekistan had launched structured victim assistance networks. Despite different approaches to preventing and investigating human trafficking, all countries in the sample experienced similar difficulties in implementing legislative initiatives and supporting cross-border interaction to counter human trafficking. The cross-border interaction was hindered by such factors as political instability and at-border conflicts, corrupted state institutions, ineffective implementation of legal frameworks, hindered data sharing processes, cultural and societal peculiarities, and geopolitical dynamics. The recommendations were to support international cooperation through transnational unions and multilateral platforms, enhance transparency and accountability of the law enforcement institutions, harmonise national legislation with international standards, and launch the boarder International Organisation for Migration-coordinated safe fund. The obtained results can be used to reduce the incidence of and rehabilitate the victims of cross-border human trafficking

Keywords: gender inequality; systemic problems; cross-border cooperation; at-border conflicts; safe funds

Introduction

Human trafficking has become a common problem around the world, whose medium and long-term consequences require further examination. Globalisation, which has opened up many opportunities for development, has also brought with it a series of challenges. One crucial challenge is related to the use of legal mechanisms to detect, combat, and prevent human trafficking at the international level. Taking into account the absence of a unified legal framework, the selected research topic is considered relevant.

According to the United Nations Office on Drugs and Crime (2024) report, the period between 2021 and 2023 was associated with a sharp increase in the number of detected cases of human trafficking. The cited experts, in particular, reported a 43% increase in the number of detected

cases, as compared to 2020, which they partly attributed to the improved mechanisms of human trafficking detection. A. Dyussenova *et al.* (2024), however, stressed that despite the progress achieved, in some regions, including Central Asia, human trafficking remains a major transnational issue. A. Dyussenova *et al.* further stressed that specific population groups, such as migrant workers, women, and children, are at elevated risks of being trafficked. This statement is consistent with the data of the Royal Thai Embassy in Astana (2025), according to which, the Republic of Kazakhstan has a long-running trafficking network targeting vulnerable population groups. The report further mentioned 19 cases of newborn trafficking registered in the country in 2024, and 15 individuals held accountable

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during the same period. The cited data suggested there was the discrepancy between the number of human trafficking cases committed and investigated, which indicated the gravity of the problem.

The risk factors for human trafficking have been explored in recent research, including the study of R.E. Klabbers *et al.* (2023). Based on the analysis of qualitative data retrieved from the interviews with 108 victims of forced labour and sexual violence, the authors concluded that the major risk factors for human trafficking included poverty, limited education, and lack of support underpinning social vulnerability. The study of L. Belaid *et al.* (2024) concerned the risk factors of human trafficking in Africa, where 5.2 people for every 1,000 people were identified as modern slaves. The researchers also explain the increase in human trafficking to the variety of forms it takes, as well as its interrelation with other forms of exploitation. According to Z. Khan *et al.* (2022), whose study involved a systematic review of 64 relevant studies, human trafficking in Central Asia was mainly due to poverty and unemployment, as well as environmental and manmade disasters. Z. Khan *et al.* further mentioned that corruption and weak policies aggravated human trafficking problem in the region. The significance of strong policies for human trafficking prevention was also stressed by F. Fadilla *et al.* (2022) whose theoretical model for combating human trafficking involved cooperation between the central government and local institutions dealing with the issue. The role of government initiatives in combating human trafficking was also emphasised by R.C. Santos *et al.* (2024) who studied the peculiarities of sexual and labour exploitation in the Amazonas region. As explained by R.C. Santos *et al.*, residents of remote and border areas were at a disproportionate risk of human trafficking due to the existence of the “sponsorship” tradition implying deception of vulnerable population groups on the part of their close people. Upon conducting an umbrella review of recent research, N. Proia-Lelouey & G. Desquesnes (2025) concluded that young people aged 12 to 14 years belonged to the highest risk group and required government support to escape human trafficking. As suggested by N. Proia-Lelouey & G. Desquesnes, government support preconditions the operation of a network of intermediary institutions, including schools and welfare services. F. Nicodemi & C. Cirillo (2024) analysed the experience of Italy, where government initiatives facilitated coordination between the asylum and anti-trafficking systems. This coordination was mainly due to the implementation of the Guidelines for Asylum Authorities, European Trafficking Directive, and other legal documents articulating the detection and prevention of human trafficking at the national and international levels.

Although human trafficking has been covered extensively in previous studies, little is known about the initiatives launched to combat human trafficking in Central Asia, which suggests the selected topic is relevant. Considering the detected gap, it was decided to examine the strategies to detect and prevent human trafficking in the

Republic of Kazakhstan, the Republic of Uzbekistan, and the Republic of Kyrgyzstan. The goal involved accomplishing the following objectives: to compare the legal mechanisms of combating human trafficking in Central Asia; to analyse the peculiarities of cross-border cooperation in detecting and preventing human trafficking; and to suggest strategies to reduce the incidence of human trafficking in the Central Asia region.

Materials and Methods

The study relied on the sample of three countries located in the Central Asian region: The Republic of Kazakhstan, the Republic of Uzbekistan, and the Republic of Kyrgyzstan. The countries were added to the sample based on their belonging to a coherent regional system sharing similar legacies, cross-border migration and trafficking problems, and comparable levels of institutional capacity. The republics in the sample, however, displayed enough variation in political and economic contexts, which facilitated meaningful comparative analysis.

Comparative legal analysis was used as the main data collection tool in the study and incorporated the following documents: Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, Supplementing the United Nations Convention against Transnational Organised Crime (Office of the Commissioner for Human Rights, 2000); Article 128 of the Criminal Code of the Republic of Kazakhstan No. 167 (1997); Article 135 of the Criminal Code of the Republic of Uzbekistan No. 2012-XII (1994); Law of the Republic of Uzbekistan No. 3PY-154 (2008); and Law of Kyrgyzstan No. 55 (2005). The selected legal provisions were compared across the following criteria: definition of trafficking; scope of criminalisation; penalties for human trafficking; victim protection strategies; human trafficking prevention measures; peculiarities of coordination and presence of coordination bodies; special provisions for children; and international cooperation. The criteria were selected because they comprehensively detect the key legal dimensions necessary to evaluate the effectiveness and completeness of anti-trafficking frameworks across countries.

The research study relied on the data retrieved from the United Nations Office on Drugs and Crime (2022; 2024) Global reports of trafficking in persons. The study also involved the analysis of the following case studies: F.M. and others versus Russia (European Court of Human Rights, 2024) and repatriation from Myanmar (The Republic of the Union of Myanmar Ministry of Information, 2025). The former case included five applicants – three from Kazakhstan and two from Uzbekistan – claiming they were trafficked to Moscow and subjected to forced labour. The latter case involved removing hundreds of foreign nationals, including Kazakhs, from Myanmar and processing them via the Myanmar-Thailand Friendship Bridge to their respective countries. The selected cases were analysed in terms of the cross-border cooperation in detecting, combating, and preventing human trafficking. The study of the

factors shaping such cooperation was carried out to design the recommendations to facilitate timely detection, effective struggle against, or prevention of human trafficking in the Central Asian region.

Results

Combating human trafficking in Central Asia

Human trafficking remains a systematic problem in Central Asia, with numbers varying considerably across the countries. In the Republic of Kazakhstan, for example, there was reported a considerable decrease in the number of offences in human trafficking – from 304 persons in 2017 to 111 in 2022 (United Nations Office on Drugs and Crime, 2022). Despite this decrease, national anti-trafficking efforts are considered insignificant to stop exploitation of vulnerable population groups. In 2024, Kazakh police launched investigations into 15 cases of human trafficking compared to 26 in 2022 (U.S. Department of State, 2024).

The same official report indicated a major decrease in the number of human trafficking cases prosecuted by the government – from 18 in 2022 to 5 in 2024. The analysis of previously conducted studies further indicated disparities in human trafficking at the national and cross-border levels: people living in the regions that experience climate changes are at a disproportionate risk of human trafficking (Kovaleva *et al.*, 2023); and women constitute up to 60% of all cases of human trafficking (Ariail *et al.*, 2024). Considering the context of the Republic of Kazakhstan, it was concluded that local governments must do more to ensure the protection of vulnerable population groups, as well as the rehabilitation of individuals who have become the victims of human trafficking. The expected efforts, in particular, involve legislative initiatives aimed at combating and preventing human trafficking. The key legislative initiatives adopted in the Central Asian region were documented in the Table 1.

Table 1. Legislative initiatives to combat human trafficking in Central Asia

Provision / Aspect	Kazakhstan	Uzbekistan	Kyrgyzstan
Primary Law	Criminal Code of the Republic of Kazakhstan (Art. 128)	Law of the Republic of Uzbekistan “On Combating Trafficking in Persons”	Law of the Republic of Kyrgyzstan “On Preventing and Combating Trafficking in Human Beings”
Definition of trafficking	Incorporates Palermo Protocol definition (recruitment, transport, transfer, harbouring, receipt for exploitation)	Broad definition aligned with Palermo; explicitly covers sexual and labour exploitation	Palermo Protocol-aligned definition covering exploitation of adults & children
Criminalisation / scope	Criminalises both sex and labour trafficking, adult & child victims	Same, with explicit provisions for children and forced labour	Criminalises sex and labour trafficking, also regulates prevention activities
Penalties	3-7 years (basic), up to 15+ years for aggravated/child trafficking or organised groups	3-8 years basic, higher for aggravating circumstances (child victims, organised groups)	3-8 years, up to 15+ for aggravating circumstances
Victim protection / assistance	National Referral Mechanism, shelters, state social services; but limited capacity in rural areas	Law defines victim status, confidentiality, rehabilitation centre network (with NGOs)	Formal NRM procedures, government + NGO shelters, legal aid
Prevention measures	Awareness campaigns, regulation of recruiters, periodic national action plans	Government-led awareness, hotlines, licensing of recruitment agencies	Annual prevention programs, information campaigns in high-risk regions
Coordination / bodies	Interagency commissions at national & regional level; MoI lead	National Interagency Commission; specialised units in law enforcement	National Council / Coordinating Committee; authorised agency under the Government
Special provisions for children	Separate article + enhanced penalties; referral to child protection services	Explicit child-trafficking provisions; priority in rehabilitation	Explicit child-protection clauses, referral to child-welfare agencies
International cooperation	Provides for extradition, mutual legal assistance; member of Palermo Protocol	Same; bilateral MoUs with neighbours	Party to Palermo; regional cooperation with OSCE/UNODC, cross-border SOPs in progress

Note: CC – Criminal Code; MoI – Ministry of Internal Affairs; MoU – Memorandum of Understanding; NAP – National Action Plan; NGO – Non-governmental organisation; NRM – National Referral Mechanism; OSCE – Organisation for Security and Co-operation in Europe; SOP – Standard Operating Procedure; UNODC – United Nations Office on Drugs and Crime

Source: compiled by the author of the research based on ADS Database (1994), Criminal Code of the Republic of Kazakhstan No. 167 (1997), Office of the Commissioner for Human Rights (2000), Law of Kyrgyzstan No. 55 (2005), Law of the Republic of Uzbekistan No. 3PY-154 (2008)

Based on the table, it was concluded that the five countries of the Central Asian region have established comprehensive legal frameworks to combat human trafficking that

broadly align with the Palermo Protocol. Each country criminalises both sexual and labour trafficking, including provisions for adult and child victims, with penalties

increasing for organised groups or aggravating circumstances. All states have enacted special measures for children, such as separate criminal provisions and referral to child protection or social reintegration services. Preventive measures are also common across the region, including public awareness campaigns, information dissemination, and regulation of recruitment agencies, often implemented through periodic national action plans. Additionally, all countries have created interagency bodies or commissions to coordinate anti-trafficking efforts, with the MoI or equivalent law-enforcement authorities playing a central role.

Despite these broad similarities, there are notable differences in implementation and institutional capacity. The Republic of Kazakhstan and the Republic of Kyrgyzstan have formalised NRMs and partnerships with NGOs, though the Republic of Kazakhstan faces capacity gaps in rural areas. The Republic of Uzbekistan maintains structured victim assistance networks, but observers a comparatively weak enforcement and limited transparency. International cooperation is generally established through the Palermo Protocol and bilateral MoUs, but the extent and operationalisation vary: The Republic of Kyrgyzstan and the Republic of Kazakhstan have more developed cross-border coordination mechanisms and engagement with OSCE/UNODC, while the Republic of Uzbekistan rereports minimal active cooperation.

Anti-trafficking initiatives in selected countries

Recent cases, including *F.M. and Others versus Russia*, provided an understanding of the strategies adopted in the Republic of Kazakhstan to combat human trafficking and rehabilitate its victims. The mentioned case involved three applicants from the Republic of Kazakhstan and two applicants from the Republic of Uzbekistan who alleged they were trafficked to Moscow, Russian Federation, and subjected to forced labour (European Court of Human Rights, 2024). The European Court of Human Rights (ECHR) concluded that Russia violated Article 4 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, Supplementing the United Nations Convention against Transnational Organised Crime (Office of the Commissioner for Human Rights, 2000), which prohibits slavery and forced labour. The ECHR also highlighted the state's obligations to protect foreign nationals from trafficking, including the duty of investigation and international cooperation.

A closer inspection of the case revealed several systemic failures that made trafficking of Kazakhstan citizens possible; and one of these failures involved the inadequate investigation of the case. Based on the ECHR report, inadequate investigation took the forms of delayed responses, failure to properly collect evidence, limited victim interviews, and absence of follow-up on leads (European Court of Human Rights, 2024). Another systemic failure was insufficient protection of foreign victims who were not provided with appropriate shelter, legal assistance, or protective measures. Furthermore, inspection of the case revealed the lack of

cross-border engagement as Russian authorities did not liaise Kazakh or Uzbek authorities to identify victims, trace traffickers, or facilitate victims' repatriation and protection.

The case of Kazakh citizens being subjected to forced labour in Russia provided insights into managing cross-border cooperation for the effective detention, combating, and preventing human trafficking. The analysed case emphasised the significance of proactive cross-border mechanisms that need to be implemented in source countries; and the main idea behind having such mechanisms is that countries should not wait for victim complaints to investigate the instances of human trafficking (European Court of Human Rights, 2024). Another lesson learned from the case was about the significance of integrating (NRMs) with international cooperation to support cross-border detection and prevention of human trafficking. Based on the analysed case, integration is possible if NRMs contain articulated procedures for dealing with foreign victims, such as immediate notification of home-country authorities, access to shelters, and coordinated repatriation of victims. In addition to the already mentioned lessons, the analysed case indicated the need for formalised agreements, taking the forms of (MoUs), and legal frameworks. An inspection of *F.M. and others versus Russia* allowed to conclude that bilateral MoUs or treaties between source and destination states precondition clarified responsibilities, streamlined investigations, and adequate protection of victims' rights. From the legal point of view, it is essential that domestic legislation explicitly provides for cooperation in cross-border trafficking cases.

Another case highlighting the significance of cross-border cooperation in combating human trafficking involved repatriation of Central Asian victims from Myanmar to Thailand in February-April 2025 (The Republic of the Union of Myanmar Ministry of Information, 2025). The repatriated Kazakh residents fell the victims of criminal gangs that had trafficked people from over 20 nationalities and engaged them into illegal online operations generating billions annually in the South East region. In contrast to the above analyse case, this one demonstrated greater involvement on the part of Central Asian states, including the Republic of Kazakhstan, the Republic of Uzbekistan, and the Republic of Kyrgyzstan, that provided assistance in identifying and assisting their residents. In April 2025, Kazakhstan identified and repatriated four of its citizens who were temporarily kept in overcrowded shelters in Thailand. According to the Republic of the Union of Myanmar Ministry of Information (2025), some of those victims required healthcare assistance, so Thai authorities required repatriating countries' officials to be present for health checks before return.

The selected case revealed several issues in cross-border cooperation aimed at combating and preventing human trafficking. The fact that hundreds of victims spent a long time waiting for repatriation indicated the absence of pre-agreed, operational consular standard operation procedures. Many countries, including the Republic of

Kazakhstan, had to mobilise their ad hoc teams, which slowed repatriation and increased the time that victims of human trafficking were forced to spend in repatriation camps. The repatriation procedure was slowed down due to the lack of a unified electronic database, which means that officials had to be physically present at borders for paperwork. The case of repatriating Kazakh citizens also revealed that the approaches to managing human trafficking might lack the balance between the rapid return of victims and their protection. The pressure to repatriate *en masse* means that victims could not receive sufficient physical, psychological, and social screening which increases the risk of re-trafficking or health crises. Furthermore, the analysed case revealed limited capacity and funding gaps in addressing human trafficking issues, especially when hundreds of people are waiting repatriation. The Ministry of International Affairs' urgent funding appeal suggests that the existence of political will does not make the country immune to unforeseen expenses associated with high-profile human trafficking cases. From an economic point of view, repatriation and reintegration of the victims of human trafficking requires predictable financing and elaborated logistic chains.

The case of repatriated Kazakh citizens suggested several lessons to be incorporated into planning cross-border cooperation in combating human trafficking. The first lesson was about the need for pre-negotiated consular SOPs and MoU templates, which might help reduce processing time at border camps by ensuring officials are present quickly for immigration and health checks. An inspection

of the selected case revealed that as of 2025, there is no bilateral MoU template covering identity verification, temporary shelter handover, quarantine and health protocol, expedited travel documentation, and other issues connected to managing human trafficking in the region. The analysed case also revealed the needed for embedding consular rapid-response teams into (NAPs) and (NRMs). The examined case allowed to assume that embedding rapid-response teams into NAPs and NRMs might tie diplomatic action to victim-referral pathways rather than ad hoc returns, hence, reduces the time that victims of human trafficking spend in at-border camps and lowers the risk of re-trafficking. The analysed cases proved that nationals of the Republic of Kazakhstan continue falling victims of human trafficking, even though strategies are being implemented to address this illegal practice. The inspection of individual cases allowed to conclude that human trafficking remains a problem in Central Asia due to insufficient cross-border cooperation, which results in poorly coordinated efforts to detect and repatriate victims, as well as identify and prosecute those involved in human trafficking.

Cross-border cooperation against trafficking in Central Asia

The above analysed cases allowed to assume there were multiple barriers to cross-border cooperation in combating human trafficking in Central Asia. The crucial barriers and the forms they are likely to take in the region are documented in Table 2 below.

Table 2. Hindrances to cross-border cooperation in preventing human trafficking in Central Asia

Factor	Description/Example
Political tensions and border disputes	Ongoing territorial disputes and unstable border relations reduce trust and impede joint anti-trafficking operations.
Corruption and institutional weakness	Corruption among officials undermines law enforcement and victim protection; some authorities may be complicit in trafficking.
Weak legal frameworks and/or their poor implementation	Laws exist but enforcement is inconsistent; insufficient victim identification and limited consular training.
Limited capacity and resources	Law enforcement lacks training, personnel, or infrastructure for effective cross-border operations.
Lack of data sharing and ineffective coordination mechanisms	No standardised protocols for information exchange; joint operations are fragmented.
Cultural and societal factors	Victims reluctant to report abuse due to stigma, fear of authorities, or legal consequences.
Geopolitical dynamics	Foreign policy priorities and regional alliances affect willingness to cooperate.

Source: compiled by the author of the research based on A. Khamzin *et al.* (2023), B.E. Kooffreh (2023), S. Chatterjee (2024), I. de Vries *et al.* (2024), F. Indraswari (2024), G. Mercera *et al.* (2024), P. Sundram (2024)

The table suggests that the effectiveness of cross-border cooperation in combating human trafficking in Central Asia is hindered by a combination of political, institutional, and socio-cultural factors. Persistent political tensions and unresolved border disputes foster mistrust between neighbouring states, obstructing coordinated law enforcement and intelligence-sharing efforts. Corruption and weak institutions further exacerbate the problem, as officials' complicity or negligence undermines anti-trafficking initiatives and erodes victims' confidence in state protection mechanisms. Although legal frameworks often exist

on paper, their implementation is uneven, with deficiencies in victim identification, inadequate consular training, and poor enforcement of penalties. Limited capacity and resources, including shortages of trained personnel and modern infrastructure, constrain the operational reach of anti-trafficking agencies. The absence of standardised data-sharing protocols and the fragmentation of coordination mechanisms prevent the establishment of a unified regional response. Moreover, cultural and societal stigmas discourage victims from reporting exploitation, while fear of legal repercussions or mistrust of authorities perpetuates

underreporting. Finally, broader geopolitical dynamics – such as shifting alliances and competing foreign policy interests – shape the level of political will and regional cooperation, often subordinating human trafficking issues to other strategic priorities. Considering the detected gaps, recommendations were developed to enhance the effectiveness of addressing human trafficking strategies in Central Asia.

The first recommendation was to address political tensions and border disputes that are present between neighbouring republics. The suggestion is grounded in the fact that political tensions and armed conflicts hinder the deployment of neutral, technical-working groups on cross-border trafficking issues. The functioning of such working groups, however, can be supported through cooperation between the United Nations Office on Drugs and Crime and the MoIs that will establish bilateral taskforces between the countries focusing strictly on human trafficking in high-risk areas. The technical-working groups might also benefit from the involvement of multilateral platforms, including the Shanghai Cooperation Organisation, Organisation for Co-operation in Europe, and Collective Security Treaty Organisation. The multilateral platforms can be used to host confidence-building meetings and to broker agreements even when territorial disputes and political tension persist.

Another suggestion was to combat corruption and institutional weakness through enhanced transparency and accountability. In some Central Asian countries, including the Republic of Uzbekistan, limited transparency and low accountability result in recurring human trafficking. The detected issue can be addressed by establishing independent anti-corruption units and hotlines, where citizens and NGOs can report human trafficking, get referred to experts, or access a status report on the ongoing investigation. The anti-corruption units have been successfully launched in the Republic of Kazakhstan where they take the form of the OECD's Anti-Corruption Network. The Republic of Uzbekistan and other Central Asian countries can take advantage of Kazakhstan's experience by launching a transparent audit system and ensuring an ongoing review of anti-trafficking funds and operations by external observers.

It was also recommended to strengthen legal frameworks by harmonising anti-human trafficking laws and procedures across the borders. The study revealed that although all five countries tend to align their legislation with the Palermo Protocol, they have varying definitions for human trafficking and victim protection norms. The detected inconsistencies hinder cross-border cooperation in preventing human trafficking and might be addressed through harmonised legislation rooted in the European Union Anti-Trafficking Directive. The harmonised legislation also implies that consular officers and labour attaches are trained to proactively identify and support their nationals, especially labour migrants who are at a disproportionate risk of becoming victims of human trafficking.

In addition to the recommended strategies, it was also suggested to address limited capacity and resources which are among the reasons for persistent human trafficking in

Central Asia. The afore cited repatriation of Kazakh nationals revealed that countries lack resources to promptly assist the repatriation of large groups of their people who have fallen the victims of trafficking. The resources can be accumulated by launching a jointly funded, IOM-coordinated (International Organisation for Migration) safe funds at state borders. It was also suggested that joint donor-funded capacity building for border guards and police can mitigate the resource inefficiency issue while boosting investigative skills and case coordination. From this perspective, Central Asian countries can model the OSCE's "Combating Trafficking Along Migration Routes" initiative that has proven effective in accumulating resources, sharing data, and facilitating cross-border investigation (Organisation for Security and Co-operation in Europe, 2025). It was also suggested to study and adopt the experience accumulated by EUROPOL (2025) Joint Investigation Teams deployed in Europe. Similar to their European colleagues, Central Asian border guards and police officers could join mobile mixed-country investigative teams to respond to cross-border trafficking networks. Hence, European experience might be helpful in boosting the effectiveness of cross-border cooperation to combat human trafficking in Central Asia. The adoption of such an experience involves cooperating to address political tension and cross-border conflicts, harmonising human trafficking laws, launching joint funds and capacity building initiatives.

Discussion

This study elaborated on the fact that persistent human trafficking reveals systemic problems of a particular country or region. This idea was, for example, elaborated in the Kyrgyz contexts, where human trafficking was partly attributed to political tension and at-border conflicts. The contribution of systemic political, economic, and social problems to human trafficking was also confirmed in previous studies, including M.A. Hansen & I. Johansson (2025). The cited experts surveyed a nationally representative sample of 776 Americans and discovered that female respondents were more likely to associate human trafficking with social vulnerability. Statistics provided by K.A. McKee (2024) stressed that gender disparity in human trafficking was not just a question of perception, but also of objective data. According to K.A. McKee, over 1 million women and children were trafficked every year, and over 50,000 of them were forcibly moved to the United States. The cited data allowed to assume that human trafficking was reported even in high-income countries, while gender inequality was among the factors aggravating this problem. Similar to previous studies, this research confirmed the contribution of systemic issues, including gender inequality, to the emergence of human trafficking networks. However, the difference is that M.A. Hansen & I. Johansson, as well as K.A. McKee inspected the American context which might differ from the Central Asian context in terms of gender equality issues.

The comparison of three Central Asian countries – the Republic of Kazakhstan, the Republic of Uzbekistan, and

the Republic of Kyrgyzstan – was further carried out to examine potential variations in human-trafficking initiatives. It was discovered that despite the relative similarity of the researched contexts, the countries varied in terms of the scope and effectiveness of human trafficking programs. Of all the countries in the sample, the Republic of Kazakhstan demonstrated the greatest efficiency in terms of international cooperation, mutual legal assistance, and involvement in cross-border training initiatives; as for the Republic of Kyrgyzstan, it demonstrated lower effectiveness levels, partly due to the Fergana Valley disputes and at-border conflicts. The contextual variations in human-trafficking initiatives were also confirmed in previous studies, including C. Macaveiu *et al.* (2024). The authors illustrated such variations by stressing that European countries focused on prevention, the Americas led in protection research, while African countries and the Arab States lagged behind in both categories. Despite some resemblance to the study of C. Macaveiu *et al.*, this research has narrowed its focus to the Central Eastern countries, which preconditioned its unique contribution to the academic discourse. E. Cockbain *et al.* (2024), in turn, examined individual-level data of 26,503 people in the United Kingdom and confirmed statistically significant geographic concentration of human trafficking. Considering the results of E. Cockbain *et al.*, cross-border comparison of human-trafficking initiatives was an expedient and methodologically justified strategy. Similar to the United Kingdom, Central Asian region involves several closely located countries, with approximately the same geographic, political, and socio-cultural contexts; hence, comparison across these countries underscores universal issues underlying human trafficking and shaping response strategies.

The research further argued that human trafficking persists due to cross-border challenges hindering preventive and response interventions. This idea was, for example, examined in the context of repatriating two Kazakh and three Uzbek nationals who were subjected to forced labour in Russia. The persistence of cross-border challenges in responding to human trafficking was also admitted in previous research, including R. Broad & N. Turnbull (2024). The cited experts examined the peculiarities of applying the UK Modern Slavery Act 2015 (Legislation, 2015) to international cooperation in human-trafficking prevention and explained that one key challenge was related to the lack of a universally accepted definition of modern slavery, which created loopholes for cross-border human trafficking. The cited findings are consistent with this research which highlighted major differences in the legislation of Central Asian countries in terms of defining human trafficking and setting criminalisation scope. R.V. Martinez *et al.* (2024), in turn, stressed that using a universally accepted definition of human trafficking could help protect previously overlooked population groups, including male victims and children. A partial consistency between this research and the study of R.V. Martinez *et al.* was in the fact that both examined national legislation in terms of protecting specific population

groups. However, in contrast to the work of R.V. Martinez *et al.*, this research study had a narrower focus, which was special provisions for children.

In this research, aligning national legislation to international standards was also named among the hindrances to cross-border cooperation in managing human trafficking in Central Asia. The comparative legislative analysis revealed that although all five countries have grounded their human-trafficking legislation in the Palermo Protocol, they differ cross-border coordination and enforcement practices. While citing the case of repatriating Kazakh nationals, this research study argued that the existence of universal standards could facilitate cross-border cooperation while reducing the time spent in at-border camps and the risks of re-trafficking. Similar conclusions were reached by S. Karaj & K. Xharo (2024) who examined cross-border cooperation in combating human trafficking in the Western Balkans. The cited experts put forward the idea that aligned legislation proves effective in case of strong law enforcement, which is consistent with this research study, where corruption, limited transparency, and insufficient accountability were listed among the hindrances to cross-border cooperation in managing human trafficking. The comparison between this research and the work of S. Karaj & K. Xharo is expedient since both Central Asia and the Western Balkans are similar in terms of their political, economic, and socio-cultural development. Meantime, inspection of the Bangladeshi context conducted by H. Taha (2024) emphasised that infrastructure and resource challenges affect cross-border cooperation in preventing or investigating human trafficking. Similar challenges were elaborated in this research study whose research focus is considered very similar to the study of H. Taha. This research has, however, made its contribution to the current discourse by suggesting strategies to integrate European and international experience in mitigating infrastructure and resource challenges. Similarities found between this research study and previously published papers emphasised the relevance of the selected topic. Cross-border cooperation in combating, preventing, and investigating human trafficking is a persistent issue in Europe, the Americas, Africa, and Asia. Nevertheless, this research study has made its own contribution to the academic discourse by narrowing down its topic to Central Asia where human trafficking reveals an interplay of geographical, political, economic, social, cultural, and other factors.

Conclusions

The comparative analysis involving three countries – the Republic of Kazakhstan, the Republic of Uzbekistan, and the Republic of Kyrgyzstan, and the Republic of Tajikistan – revealed that human trafficking has been a persistent issue in Central Asia since the collapse of the Soviet Union in 1990. The problem was attributed to political insecurity, at-border conflicts, poverty, and gender inequality; it was also discovered that human trafficking persists because of insufficient cross-border cooperation in combating, investigating, and preventing the problem. The research

involved comparative legal analysis, according to which, all countries in the sample have adopted comprehensive legal frameworks to combat human trafficking. Although all these frameworks have been rooted in the Palermo Protocol, their implementation somewhat varies across the countries: while the Republic of Kazakhstan and the Republic of Kyrgyzstan have formalised NRMs and partnerships with NGOs, Uzbekistan has maintained structured victim assistance networks. Despite the detected differences, all countries in the sample encounter with weak enforcement procedures that are characterised by limited transparency and insufficient accountability. These limitations were, for instance, detected in the case of *F.M. and Others v. Russia*, involving two Kazakh and three Uzbek nationals subjected to forced labour in Russia. The inspection of the mentioned studies allowed to detect six groups of obstacles to cross-border cooperation in managing human trafficking in Central Asia: political tensions and border disputes; corruption and institutional weakness; ineffective implementation of legal frameworks; lack of data sharing and insufficient coordination mechanisms; cultural and societal peculiarities; and geopolitical dynamics. Considering the detected hindrances, the following strategies were suggested to support cross-border efforts to combat human trafficking in Central Asia: to address political tensions and border disputes by involving international unions and relying on multilateral platforms;

overcome corruption and institutional weakness through enhanced transparency and accountability; strengthen national legal frameworks through harmonising them with international standards; and increase the national human trafficking management systems' capacity by launching the border IOM-coordinated safe funds. This research study has some limitations, included a comparatively small number of countries to analyse. In the future research, this recommendation can be addressed by adding more countries to the sample or comparing human trafficking management strategies in Central Asia to other regions, such as South Asia, the Americas, or Europe.

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B. Kakeshov conceived the study, collected and analysed the data, conducted the comparative legal analysis, and drafted the manuscript. The author approved the final version of the article.

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None.

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