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For further details about the project and full European project team please visit:

www.brookes.ac.uk/microsites/combat-human-trafficking

Introduction

Human trafficking is one of the most profitable types of crime today after arms and drugs trading. With the hospitality industry in the EU employing some 9.5 million¹ workers, spread out across 1.7 million enterprises, traffickers and organised criminals are looking for opportunities to exploit a sector perceived to be largely defenceless, and sometimes even complicit to their activities.

The nature and necessities of human trafficking - the requirement for continuous movement, temporary accommodation, supply of low cost products and services and the privacy and anonymity offered to guests - place hotel businesses in a high level of exposure. Your hotel, whether affiliated to a brand or being independent, may be impacted in a number of ways:

- (1) it might be the venue for the sexual exploitation of adults and children, forced criminality and/or used to accommodate victims as part of the human trafficking journey;
- (2) staff in your hotel could be victims of human trafficking, having been recruited or subcontracted via dishonest agencies; and/or
- (3) products and services supplied to the hotel could be produced by those in forced or bonded labour.

The COMBAT training toolkit, comprising three reference guides and other training material, is designed to be a practical, step-by-step guide for hotels to proactively fight trafficking. The reference guide defines what trafficking in human beings means and examines the extent of the human trafficking problem, identifying human trafficking flows across Europe. The key difference between human trafficking (often defined as modern slavery) and human smuggling are also explained as there is much confusion over these terms. It examines the extent of human trafficking in hotels and identifies the reasons why they are vulnerable to THB and should be proactive in combating it. The participants involved in human trafficking and the relationships between them are identified in order to see how they might influence THB victims.

The last sections of the reference guide concentrate on combating THB by suggesting how to spot potential victims in the front and back of house and develop procedures, standards and policies to erect barriers to reduce opportunities for traffickers to do business. Finally, and most importantly, there are suggestions as to how best support THB victims and survivors.

Whilst helping the hotel you work in become less vulnerable to the incidence of human trafficking should be a goal, we all have a moral obligation towards the victims and survivors of THB. Working through this reference guide should be the first step towards helping to eradicate this form of modern-day slavery.

How to Use this Guide

This reference guide consists of 6 Units which bring together what hotel operations staff and managers should know about Trafficking in Human Beings in the hotel industry and how to develop an anti-THB strategy in their organisations.

Trainers may design their training courses by picking the Units that they consider are more relevant to their respective audience. They may conduct their training sessions as a one-day workshop or as shorter seminars according to the time they have available and the priorities set by the organisation as well as its training needs.

There is a deck of slides that supports this reference guide from which trainers may pick the slides they need and create their own, tailor-made, PowerPoint presentation.

Finally, there are 7 THB cases in the toolkit available for trainers to use as they deem appropriate in order to better illustrate the points they choose to make during their sessions. These case studies are described in 1-page texts and illustrated in PowerPoint in sets of 10 slides per case. The cases may support wider training sessions or may be used separately for targeted training or refresher sessions. As a guiding point, each case study should take approx. 30 mins to discuss.

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Unit 1: What is Human Trafficking?

In this unit we examine what trafficking of human beings (THB) is.

We therefore:

- define what human trafficking means,
- examine the extent of the human trafficking problem across Europe and globally,
- explain human trafficking flows and
- identify the key differences between human trafficking and human smuggling.

1.1. What is human trafficking

In recent years we have heard and read a great deal about human trafficking. Based on what you know, what exactly is human trafficking – also known as trafficking in human beings (THB)?

Activity 1.1 Trafficking in Human Beings (THB) is:

- a. something that can be happening next door,
- b. a global criminal activity,
- c. a form of modern day slavery,
- d. exploitation of vulnerable people,
- e. all of the above.

Of the groups indicated below, which would you say is vulnerable to human trafficking?

- a. migrant workers,
- b. sex workers,
- c. children and young people,
- d. war or political refugees,
- e. all of the above.

Write your answers to Activity 1.1 here:



Write your answers to Activity 1.1 here

Definitions of human trafficking

The European Union² defines the trafficking of human beings (THB) as the recruitment, transportation, transfer or harbouring of persons who are in a position of **vulnerability**, using threat, force or other forms of **coercion** for the purpose of **exploitation**.

Vulnerable people are those that are more exposed to, or likely to be, trafficked. There are a number of conditions that make some people more vulnerable to THB and these are explored further in Unit 3.

There are a number of different types of **exploitation** including:

- sexual exploitation,
- forced labour or services (including forced criminality),
- slavery or practices similar to slavery,
- domestic servitude,
- removal of organs,
- forced begging,
- illegal adoption,
- forced marriage.

Activity 1.2 A Case of Human Trafficking?

Read Karla's Case Study in Appendix 1 at the end of this unit.

Determine whether this is a case of human trafficking and explain the reasons for your answer.

If it is a case of THB, identify what type of exploitation is involved?

Write your answers to Activity 1.2 here:



THB involves:

- coercion
- vulnerability
- exploitation



Write your answers to Activity 1.2 here

1.2 The extent of THB

THB is a global criminal activity. Although people think that it happens only in some poor or underdeveloped countries it literally happens everywhere. Almost every country in the world is a **source, transit point** or **destination** for THB victims.

Determining the extent of THB is not easy for a number of reasons. Different legal definitions, different reporting systems and different ways to record or classify crimes in different countries make measuring THB a very complex task. Even across Europe where THB is clearly defined, there are multiple interpretations of what human trafficking is and who can be considered a victim.

One of the key issues is that many countries use different systems to collect data on THB. In Europe, some organisations collect their own data; e.g. the Group of Experts on Action against Trafficking in Human Beings (GRETA), while others rely on national authorities to collect and report country data, e.g. the European Statistics Agency (EUROSTAT). On a global level, data is collected by the United Nation Office for Drugs and Crime (UNODC) and the International Labour Organization (ILO).

In addition, other researchers who have examined THB, estimate that the number of victims officially reported through these organisations is just the 'tip of the iceberg'. In other words, there are many more victims of THB than officially reported. As a result, there are wide variations in the extent of THB reported or estimated as Table 1.1 and Table 1.2 below demonstrate.



Did you know?

Globally, the average cost of a trafficked victim is \$90

Table 1.1: Extent of THB in Europe

Number of THB Victims	Source
30,146	Eurostat (2015) : victims between 2010 and 2012 ³
1,140,000	Datta and Bales (2013) ⁴

Table 1.2: Extent of THB Globally

Number of THB Victims	Source
40,177	UNODC (2014) : victims between 2010 and 2012 ⁵
30,000,000	Crane (2013) ⁶
21,000,000	ILO (2012) ⁷

Q1: Why are there differences between the THB figures reported?

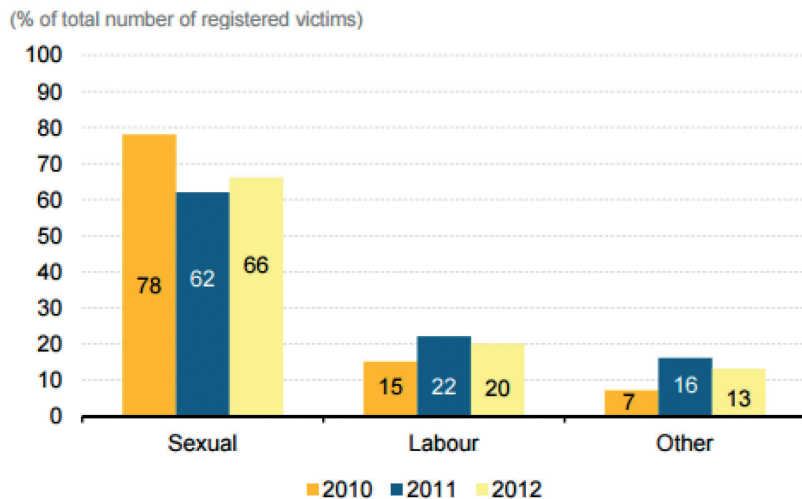


Write your answer to Question 1 here

1.3 Exploitation and Victims of THB

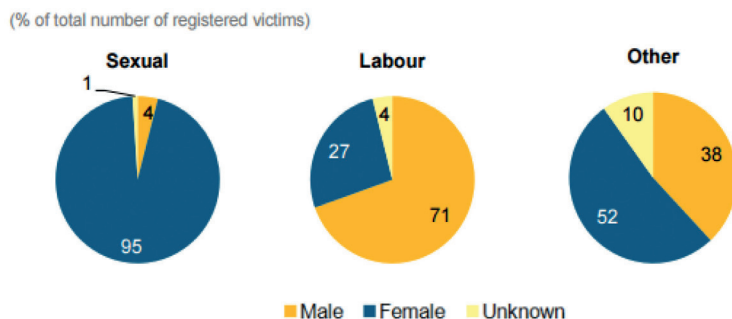
According to data collected by Eurostat⁸ from EU member states, the majority of THB victims are trafficked for **sexual exploitation (66%)**, followed by **forced labour (20%)** and **other forms of trafficking (13%)** as shown in Figure 1.1 below.

Figure 1.1 Registered victims by type of exploitation (2010-2012)



THB is a highly **gendered crime** as Figure 1.2 below shows. Data collected by Eurostat reveals that there has been an increase in the number of male victims trafficked for labour exploitation.

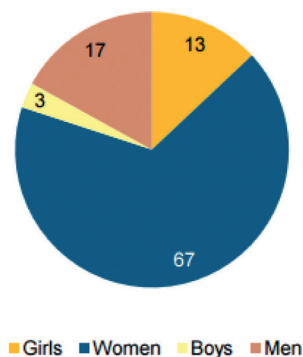
Figure 1.2 Registered victims by gender and type of exploitation



Source Eurostat (Based on data from 22 member states which provided data for all three years)

THB also can be broken down by gender and age profile as Figure 1.3 below shows.

Figure 1.3 Registered victims, percentages (2010–2012)



Source Eurostat (Based on data from 22 member states which provided data for all three years)



Did you know?

The majority of victims of human trafficking are young, between the ages of 18 and 24.



Majority of female victims trafficked for sexual exploitation.

Majority of male victims trafficked for labour exploitation.

Activity 1.3: The Facts about THB

Use the information in the preceding section to help you to identify answers to the following questions.

- What is the most common type of exploitation?
- What are males most likely to be trafficked for?
- Why is trafficking considered a gendered crime?
- What is meant by 'other' types of exploitation?

Write your answers to Activity 1.3 here:



Write your answers to Activity 1.3 here

1.4 World-wide trafficking flows

THB victims can be trafficked within their own country or internationally. Trafficking flows are used to map routes for those trafficked internationally between their country of origin (trafficked from) and their country of destination (trafficked to). They are 'imaginary lines that connect the same origin country and destination country of at least five detected victims [and] criss-cross the world'⁹.

The United Nations¹⁰ has identified at least **510 world-wide trafficking flows**. Within Europe, Eastern European countries and the Balkans tend to be origin countries and those within Northern and Western Europe are normally destination countries. Southern European countries tend to be used when victims are in transit from Asia, Africa and the Americas. In reality however, trafficking happens everywhere. While most of the **reported** victims of THB have been trafficked internationally, most victims are trafficked close to home, within the region or within their country of origin, and their exploiters are often fellow citizens¹¹.

Q2: Can you think of how the knowledge of trafficking flows might help hotels to combat THB?



Write your answer to Question 2 here

1.5 Are human trafficking and human smuggling the same thing?

Human trafficking and human smuggling are **not** the same. One of the key differences between human trafficking and human smuggling is that the latter always involves the illegal crossing of national borders. For example, smuggling occurs when a person pays another (the smuggler) in order to **migrate illegally to a destination country** and once the destination is reached the agreement generally ends. The people who have been smuggled into a country may claim asylum or other humanitarian protection if they flee from wars, persecution or other calamities but they are **not protected** by any legislation related to human trafficking.

However, on reaching a destination country, it is possible that a situation like this could turn into a case of THB; for example, if the human smuggler is dissatisfied with the amount of money they have received or if they decide to abuse their power to take advantage of the vulnerability of the person smuggled. If that person is then **kept captive against his or her will for exploitation**, they become a victim of human trafficking.

The key differences between human trafficking and human smuggling therefore are:

- that a smuggler facilitates or transports a person across borders generally for payment, while a trafficker is someone who controls, uses or exploits a victim for profit¹²,
- human trafficking does not necessarily involve illegal crossing of national borders,
- trafficking involves victims' exploitation, and their initial consent to be smuggled across borders becomes irrelevant once the person smuggled is held captive by the smuggler who has now turned into a trafficker¹³.

Q3: What is the difference between human trafficking and human smuggling in terms of violation?

Q4: Can a person who has been smuggled into a country be protected by human trafficking laws?



Smuggling is a violation of the state.

THB is a violation of the person.

Key differences:

- consent
- exploitation
- transnationality



Write your answers to Questions 3 and 4 here

1.6 Summary

In this unit we identified:

- that THB involves the coercion and exploitation of vulnerable victims,
- why it is difficult to measure the exact extent of THB,
- the majority of THB victims are women, exploited for sexual purposes,
- that there has been an increase in the number of male THB victims exploited for labour purposes,
- that 510 world-wide trafficking flows have been identified and
- there are clear distinctions between human trafficking and human smuggling.



Appendix 1: Karla's Case Study

Victim: Karla, a 22-year old female trafficked in Denmark.

Type of Exploitation: _____

Karla's Story:

I thought I was lucky to have been promised the opportunity to work in a smart city centre hotel in another part of the country. I got the job offer through a distant relative who took me to the city and introduced me to a group of 'her' business associates. They were very kind at first and I was excited. I soon realised that things were not actually what was promised. At the beginning, they helped me with some basic training and to apply for a job in the reservation's department of a hotel. They also made sure I was presentable so that I could go for an interview. With the CV they provided me, I got the job. The hotel took my address from the CV. It wasn't my real address, but I guess no one from the hotel ever checked. I also provided the hotel with details of a bank account that my wages were paid into. I wasn't able to access that account to get hold of any money, but I guess nobody checked for that either. Who would give their employer a bank account that they cannot access? At least the hotel provided meals during my shifts so I didn't go hungry when I was working.

At work, I followed my orders from the traffickers. I began to change non-commissionable room reservations into ones booked by the traffickers 'fake' travel agency so that the commission could be paid directly into their bank account. However, many reservations I changed, the traffickers always wanted more. I started to volunteer to work extra shifts, so I could change more reservations. I knew it was risky so I tried to keep to myself. I didn't go to any staff social functions but volunteered to cover other employees' shifts instead. When colleagues offered me a lift home after work, it was easy to have them drop me off on a street corner so I didn't have to give them a street address.

I don't know why I kept doing what I was doing. I felt trapped and had nowhere else to go. I was afraid of what the traffickers might do to me. Their plan was to have me apply for the same job in a bigger and better hotel as soon as one became available so they could make more money on each reservation I changed. It was almost a relief when the hotel discovered what I was doing and called the police. When I was arrested, the police were really only interested in the crime I committed, not my story. They kept me in jail though, as I had no fixed address or any means of support. At least I felt safe from the traffickers there. It was only when the case went to court that my true story came out and with it, the story of several others, like me. It seems that these traffickers had quite a big business going across the city. We were their hidden employees really, working hard for them while employed by the hotels; working hard to cheat the local hotels and feed funds into the traffickers' bank accounts.



Do not forget to answer the questions related to this case in Activity 1.1.

Unit 1 Answers

Activity 1.1 What is human trafficking?

Answer: If you selected 'a', 'b', 'c' or 'd' you are right but the reality is that it is all of these things. If you selected 'e', all of the above you are spot on! The same answer applies to second question.

Activity 1.2 Karla's Case Study

Karla was a victim of THB. She was exploited for labour purposes but forced to commit a criminal act. As such, she is a victim of forced criminality.

Question 1

There are a number of reasons for the differences between the different figures reported including:

- differences in reporting systems in different countries,
- different systems are used in different countries to collect and record data,
- different 'legal' interpretations of what THB is,
- different ways of recording or classifying crimes in different countries.

Activity 1.3 The Facts about THB

- the most common type of exploitation is sexual exploitation,
- males are most likely to be trafficked for labour exploitation,
- trafficking is considered a gendered crime as females are most likely to be trafficked for sexual exploitation and males for labour exploitation,
- other types of exploitation include slavery, servitude, organ removal, forced begging, illegal adoption and forced marriage.

Question 2

Hotels can use the knowledge about trafficking flows to identify whether individual hotels are more likely to be used as a vehicle for trafficked victims. Those hotels in close proximity to trafficking flows are more at risk of being used by traffickers.

Question 3

The key differences between human trafficking and human smuggling are:

- transnationality: human smuggling always involves illegal transport across international borders but human trafficking can occur within or across countries,
- exploitation: Victims of human trafficking are exploited by traffickers whilst those smuggled are usually just transported,
- consent: Human smugglers transport a person across borders for payment, whilst a trafficker exploits a person for profit (even if they have originally consented to be transported),
- human trafficking is therefore a crime against the person whereas human smuggling is a crime against the state.

Question 4

A person who has been smuggled into a country may claim asylum or another type of humanitarian protection if they have been fleeing their origin country for persecution reasons or because of war or other calamities. They are not protected by the same legislation as victims of THB.

Unit 2: Why does Human Trafficking Matter to the Hospitality Industry?



In this unit we:

- examine the extent of human trafficking within the hospitality industry,
- identify the reasons why hospitality businesses are vulnerable to human trafficking, and
- identify the reasons why hospitality businesses should adopt a proactive approach to combat human trafficking.

2.1 Human trafficking in the hospitality industry

Now that you have a better understanding of THB as a global phenomenon, do you think that it is an issue for the hospitality industry?

- No
- Yes
- Perhaps

Unit 1 identified that it is difficult to determine the precise number of victims of THB. The same can be said for determining the number of victims trafficked through hotels and other sectors of the hospitality industry. Recent research identifies that hotels, restaurants and other food and beverage establishments are increasingly used for both sexual and labour exploitation.

The National Trafficking Resource Center (US), reports¹⁴ that hotels and motels are the second most popular venue for trafficking for sexual exploitation (brothels are the most popular) and restaurants and bars are two of the most popular venues for labour exploitation.

In the USA in 2015, there were 5,544 officially reported trafficked victims. Of these trafficking incidents:

- 8.2% of sex trafficking occurred in hotels
- 1.3% of labour trafficking occurred in restaurants and bars
- 0.6% of labour trafficking occurred in hotels.

As we saw in Unit 1, different data are used to record the extent of THB. One research study we looked at estimates that in 2012 there were approximately **1,140,000 victims of THB** in Europe¹⁵. Instead of using statistics based on reported cases of THB, these researchers developed a method to calculate the 'dark figure' of the crime of THB, arguing that officially reported figures were only the 'tip of the iceberg'.

Activity 2.1: The extent of THB

In this activity we would like you to calculate the potential extent of THB in the European hospitality industry. Using the estimate of **1,140,000 victims of THB** in Europe and the percentage of sex and labour trafficking in hotels, restaurants and bars identified by Polaris¹⁷, calculate the potential number of victims of THB in the European hospitality industry.

Did you know?

Human trafficking is the third largest international criminal industry (behind illegal drugs and arms trafficking). It is reported to generate a profit of \$32 billion every year.

\$15.5 billion of that profit is generated in industrialised countries.

Did you know?

Hotels are the 2nd most popular venue for sex trafficking.

There are potentially:

- _____ victims of sex trafficking in hotels
- _____ victims of forced or bonded labour in restaurants and bars
- _____ victims of forced or bonded labour in hotels

In total, that means there are potentially _____ annual victims of human trafficking in the European hospitality industry.

Victims of sex trafficking may be forced to stay in hotels or similar types of accommodation, where customers come to them (in-call) or may be forced to visit customers at their hotels (out-call). Alternatively, they may be exploited for labour purposes within hotels, restaurants and bars. Unfortunately, many of these victims remain 'invisible' to those who work within the hospitality industry. It is because of this invisibility, that many argue official statistics on THB are gross underestimates of the true extent of THB¹⁶.

Where in the business do you think hotels operate with a risk of human trafficking?

- a) in hotel properties and operations,
- b) amongst hotel suppliers and sub-contractors,
- c) with business partners, such as travel agents,
- d) with the use of hotel products and services by guests,
- e) all of the above.

If you answered all of the above, then you are correct because unfortunately hotels are exposed to risk in all of these locations. We will look in more depth into these locations in the next sections of the reference guide. If you answered to only one or more of these, you are partly accurate as hotels certainly are at risk from human trafficking. However, in reality, they do work with risk in all areas of the business.

2.2 Why is the hotel industry vulnerable to THB?

All hotels, regardless of their size, brand or location are vulnerable to THB. There are a number of characteristics of hotels and their operational practices which make them particularly vulnerable to human traffickers and their victims. These characteristics can be categorised accordingly:

Strategic:

- The use of asset-light models, where ownership of the hotel property is separated from the management of the hotel brand.
- The belief that by adopting good practices, such as signing the Code of Conduct for the Protection of Children from Sexual Exploitation, the business or brand reputation will be damaged by admitting there may be a problem in their properties.

www.thecode.org

Organisational Culture:

- There is often confusion between prostitution (not a criminal offence in many countries and accepted within hotels) and sex trafficking. As a result, staff members do not perceive that a crime is being committed.



Write your answers to Activity 2.1 here:



Did you know?

Many argue that the officially reported figures on the extent of THB are only 'the tip of the iceberg'



- Hotel owners/managers sometimes offer external ‘services’ to guests, which may be commissionable and management and staff share in the proceeds.
- Hotel owners/managers sometimes offer internal ‘services’ (as opposed to external service providers) to minimise the risk of danger to guests.
- Employees may have a customer orientation and willingly respond to customer requests or demands without moral boundaries.
- There may be greater consideration given to revenue generation at the expense of ethical or moral behaviour.



Hotel characteristics that increase their vulnerability to THB can be categorised as:

- strategic
- organisational culture
- technological
- operational
- employment practices
- outsourcing strategies

Technological:

- Automated reservation systems, often using third party distributors, enable traffickers to apply for entry visas to countries and transport victims to these countries for exploitation.
- Mobile and automated check-in systems mean that the check-in process and room access is not monitored.

Operational:

- Many hotels do not require full identification for all guests staying in a property, especially if children are accompanying adults.
- Many hotels do not require all guests to sign in or register at check-in, particularly if they are children accompanying an adult.
- The privacy and anonymity normally offered to guests provides a level of protection for traffickers.
- Unrestricted use of ‘do not disturb’ signs means that guests are allowed to remain invisible to staff for extended periods of time.
- Accepting payment for accommodation and other services by cash makes traffickers and their victims harder to trace.
- The lack of clear guidelines for reporting suspected incidents.

Employment Practices:

- The frequent use of recruitment or employment agencies to fill key operational roles.
- The frequent use of temporary or seasonal labour.
- The use of low or unskilled labour where legislation and labour or human rights are unknown to employees.
- The use of culturally-diverse labour pools where language barriers may prevent reporting and/or an understanding of their rights.
- The lack of trade union representation in many countries to support staff members.
- Poor human resource practices where employee checks are not completed thoroughly.
- Minimal staffing levels in budget or apartment-style accommodation which provide greater leeway to traffickers.
- The lack of training on spotting the signs of trafficking.
- Anti-THB training and awareness is conducted only to comply with corporate

policy without taking the issue seriously or implementing clear measures to address it.

- The lack of protection for employees who report suspected incidents and who, as ‘whistle blowers’, may be forced to resign.
- Employees who fear retribution from other members of staff complicit in trafficking if they report any suspected incidents.

Outsourcing Strategies:

- Contractual outsourcing of services (e.g. housekeeping, maintenance or gardening) to suppliers who may have unethical employment practices or who may not vet their staff.
- The use of global supply chains which are complex and opaque and therefore difficult to monitor.

Activity 2.2: Hotel Industry Vulnerabilities

From the preceding list, identify:

- 2 factors that make the hotel industry more vulnerable to sex trafficking,
- 2 factors that make the industry more vulnerable to labour trafficking,
- explain the reason for your answers.



Write your answers to Activity 2.2 here:

Activity 2.3: Karla’s Case Study in Unit 1 & Hotel Vulnerabilities

Revisit the Case Study at the end of Unit 1.

- identify the particular characteristics or operational practices in this case that made the hotel vulnerable to trafficking,
- determine which category of vulnerability (Section 2.2) each of these characteristics or operational practices falls within.



Write your answers to Activity 2.3 here:

2.3 Why is it important to combat THB in the hospitality industry?

In countries around the globe, there has been a growing focus on the use of hotels as vehicles for human trafficking, and particularly for the purposes of child sexual exploitation (CSE). More and more governments are recognising that hotels may be used, knowingly or unknowingly, for traffickers and their victims. They are therefore calling for the support and involvement of hotels and their staff members in the fight against human trafficking¹⁷.

Regardless of whether hotels:

- are unknowing or unwitting participants,
- adopt a 'head in the sand' approach and ignore trafficking signs, or
- are willing participants who may or may not share in the trafficking proceeds.

they can potentially be deemed '**culpable**' in an incident of human trafficking. When trafficking incidents occur in hotels, they are therefore subject to criminal and civil liability. Many argue for additional legislation which requires companies to disclose their anti-trafficking policies and activities.

Along with the legal obligations, however, hotel companies have an ethical and moral obligation to combat THB. As corporate social responsibility (CSR) has grown in importance, companies have become more mindful of human rights, labour rights, anti-corruption and their environmental responsibility. By actively combatting THB, hotels demonstrate to stakeholders (investors, customers, employees and suppliers) that they support human and labour rights as well as anti-corruption initiatives. Such actions can help to build stakeholder trust in the business or the brand and enhance value.

Including anti-THB policies and practices on CSR agendas and implementing anti-trafficking initiatives have been shown to help firms achieve competitive advantage by lowering costs and/or better serving the needs of stakeholders and society. Proactively addressing human trafficking can therefore help firms to mitigate against legislative, regulatory and financial business risks.

In contrast, a failure to take action against human trafficking can cause significant damage. The reporting of a single human trafficking incident can result in:

- extensive negative publicity,
- business interruptions by law enforcement agencies,
- business interruptions due to public protests,
- potential criminal or civil lawsuits,
- a negative impact on the hotel/brand reputation,
- an erosion of customer trust in the hotel/brand,
- a decrease in shareholder value,
- a negative impact on staff morale,
- a decline in hotel/brand profitability.



Did you know?

Meetings, event and other corporate travel planners are demanding to see positive anti-THB actions by hotel firms prior to booking meetings or events

meetingsnet.com/association-meetings/speaking-out-against-human-trafficking

While some hoteliers might hesitate in publicising their initiatives to combat trafficking for fear of alienating customers and investors, there is clearly more potential damage resulting from a lack of action. One only has to look at the volume of negative publicity that companies received after the implication of some of their hotels in THB. See for example, the cases of:

- Wyndham Hotels and Resorts, and
- Hilton Worldwide

The costs of managing the media and limiting the damage of negative publicity can be extremely high.

Activity 2.4 Potential Implications of THB

In your own words, explain the potential implications for hotels that are used, either knowingly or unknowingly, for THB.



Write your answers to Activity 2.4 here

Research also suggests that there has been no ‘bad press’ reported for companies that proactively sign up to initiatives such as the **Code of Conduct for the Protection of Children from Sexual Exploitation**. In fact, those companies who have signed up to the Code have received positive press and improved morale amongst staff members. Carlson, the first hotel group to sign the Code in 2004¹⁸, does admit that negative publicity was a concern prior to signature, but in reality they received positive publicity and support from customers and other stakeholders.

Other current hotel signatories to the Code include Wyndham Worldwide Corporation, Hilton Worldwide, Real Hospitality Group and Accor Hotels. These signatories also report benefits of sharing industry and stakeholder knowledge amongst themselves and firms from other hospitality and tourism sectors.

Carlson is also one of the founding members of the multi-sector **Global Business Coalition Against Trafficking** which aims to eradicate all forms of trafficking in supply chains by compiling individual experiences and resources to address trafficking to disseminate best practices. Another notable initiative in this area is the campaign of the International Tourism Partnership¹⁹.

There are clear advantages therefore in taking a proactive approach to addressing THB, rather than adopting a reactive approach following the identification of a trafficking incident.

www.change.org/p/stop-wyndham-hotel-staff-from-supporting-child-sex-trafficking-in-wyndham-hotels

www.hotelnewsnow.com/Articles/11778/Hotels-are-hub-of-human-trafficking-prevention



Activity 2.5 Joining the Code

Visit the website, www.thecode.org and examine the signatories to the Code of Conduct for the Protection of Children from Sexual Exploitation.

- Find five hotel companies that are top members?
- Which five sectors of the tourism industry are represented on the Board of Directors?
- What are the four main benefits of joining the Code?



Write your answers to Activity 2.5 here

2.4 Summary

In this unit we:

- identified the prevalence of human trafficking in hotels and other hospitality sectors,
- identified and categorised the factors that contribute to the vulnerability of hotels to both sexual and labour trafficking, and
- explored the reasons why hospitality businesses should proactively combat human trafficking.



Unit 2 Answers

Activity 2.1

There are potentially:

- **93,480** victims of sex trafficking in hotels
- **14,820** victims of forced or bonded labour in restaurants and bars
- **6,840** victims of forced or bonded labour in hotels

In total, that means there are potentially 115,140 annual victims of human trafficking in the European hospitality industry.

Activity 2.2: Hotel Industry Vulnerabilities

Factors that make the hotel industry more vulnerable to sex trafficking are any factors listed under the following headings:

- Strategic
- Organisational culture
- Technological
- Operational
- Employment Practices **except: trade union representation, poor HR practices**
- Outsourcing strategies particularly for housekeeping

These factors make it easier for traffickers to remain undetected when using hotels as vehicles for trafficking sex victims and for their victims to remain hidden from hotel employees.

Factors that make the industry more vulnerable to labour trafficking include those listed in the following categories:

- Employment Practices
- Outsourcing Strategies

These factors enable labour victims to remain undetected by those who employ them, their co-workers and within the organisations that supply the hotels. Even when co-workers may suspect something, they often lack the knowledge or means to act upon their suspicions.

Activity 2.3 Karla's Case Study & Hotel Vulnerabilities

In this case, the hotel was vulnerable to trafficking due to poor employment practices. The hotel did not check the CV of Karla or her address. As we will see in later units, there were also other behavioural signs of trafficking that colleagues might have noticed.

Activity 2.4 Potential Implications of THB

When hotels are used as vehicles for THB there are a number of implications including:

- criminal liability,
- civil liability,
- negative publicity,
- reputation damage,
- business interruptions,
- loss of customers,
- reduced employee morale,
- reduced turnover/profitability.

Activity 2.5 Joining the Code

Five hotel companies that are top members of the code include:

- Accor
- Carlson
- Hilton
- Riu
- Melia Hotels International

The five sectors of the tourism industry represented on the Board of Directors are:

- tour operators,
- hotel chains,
- travel agency/distribution,
- airlines,
- one open seat with links to the sector.

The four main benefits of joining the Code are:

- being known as a responsible brand,
- gaining a competitive edge,
- mitigating potential risks,
- connecting with the tourism community.

Unit 3: Who is Involved in Human Trafficking?

In the last unit we identified the reasons why hospitality businesses remain vulnerable to THB and why they should take action to proactively combat THB. In this unit we look at who is involved in trafficking and:

- explore the key actors or participants involved in human trafficking and identify the relationships between the key actors
- identify how these relationships influence THB victims.

3.1 Human Traffickers

Human trafficking is one of the fast growing criminal activities. It generates:

- US \$150 billion in global revenue where,
- US \$99 billion comes from sexual exploitation, and
- US\$ 51 billion comes from labour exploitation²⁰.

For traffickers therefore, THB is a 'big business'. In reality however, traffickers work in different sizes and types of organisations.

Some traffickers work as part of large, organised criminal networks which operate internationally, transporting victims between different countries for exploitation purposes. In other cases, traffickers are independent operators or are part of smaller, family or clan-style organisations which operate on a local or regional basis. Traffickers often work cooperatively to recruit, transport and exploit victims. Research also suggests that traffickers often specialise in specific types of trafficking depending on their nationality²¹.

In reality, there is no such thing as a 'typical' trafficker, although they are often considered to be, or imagined as, middle-aged males. However, there are growing numbers of women involved in trafficking and in some countries over 50% of traffickers are women, a much higher percentage than in other types of crime²². Experts argue that a key reason for the high involvement rate of women is that trafficked victims, particularly those who are young, are more likely to trust female traffickers.

Women are often involved in the recruitment of new victims for sexual exploitation, although sometimes they are coerced into recruiting new victims. At other times their actions are unintentional; for example, when encouraged to invite their friends to work abroad and they all end up as victims of sexual exploitation and/or forced or bonded labour. Additionally, female victims are sometimes co-opted by their traffickers into their network thereby becoming perpetrators²³.

Q1: Why are so many women involved in trafficking?



Did you Know?

THB generates \$150.2 billion per year in illegal revenue globally. Two-thirds of that revenue is generated by commercial sexual exploitation. The other third is generated by forced labour exploitation

Did you Know?

More women are involved in trafficking than in other type of crime.



It is important not to conform to the stereotypes people hold of traffickers – they are usually people that the victim knows on a personal basis (family members, relatives, friends, etc.)

3.2 Hotels and THB

As criminals, traffickers tend to seek the path of least resistance. Unfortunately, many hotels offer these 'resistance-free' pathways, often without their knowledge, and remain vulnerable to traffickers for the reasons identified in Unit 2. Nonetheless, as Unit 2 also identified, there is a clear case for hotels and other hospitality businesses to undertake a proactive approach to combat THB.

Given that hotels (and other hospitality businesses) have been identified as popular vehicles for sexual and labour exploitation, it is important that all staff members are trained to look for and spot the signs or signals of THB, regardless of their position or department. It is important to remember that trafficking for both sexual and labour exploitation occurs in hotels. However, it is also important that there are clearly defined reporting procedures which staff can use without fear of retribution.

3.3 The Law and THB

Even though THB is a criminal activity in 146 countries²⁴, conviction rates of traffickers across the globe are low. While these rates vary by country, in Europe, only 44% of prosecutions result in convictions²⁵. In fact, these rates are lower than other serious crime conviction rates.

There are four possible reasons²⁶ why conviction rates for THB remain low including:

- a low level of identification/reporting of victims (which may not reflect the reality of the situation),
- the hidden nature of the crime (victims are often reluctant to report the crime and the reliance on victims to testify in court),
- the limited capacity or resources to investigate trafficking incidents and corruption.

The differences in legal definitions of trafficking and national legislation, as discussed in Unit 1, also impact on conviction rates. It is important therefore, that those working within hotels have a good relationship and collaborate with law enforcement officials to combat THB and increase conviction rates.

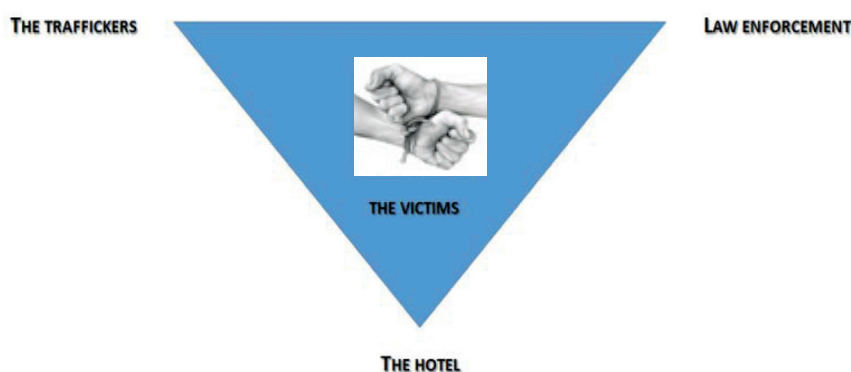


146 countries have criminalised THB in line with the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (2003)²⁹

3.4 The relationship between traffickers, hotels and law enforcement

This unit has identified three key players in THB; the traffickers, the hotel and law enforcement officials. The relationship between these actors is depicted in Figure 3.1 as occupying three sides of a triangle with victims potentially trapped in the middle.

Figure 3.1



3.5 Victims of THB

As we saw in Unit 1, the victims of THB are some of the most vulnerable in society. There are a number of conditions²⁷ that increase this vulnerability including:

- poverty,
- unemployment,
- limited education,
- civil unrest,
- limited social support,
- limited or unstable family life.

These conditions **‘push’** victims into trafficking. In other words, they make the ‘potential opportunities’ offered by traffickers for employment or transport to other regions or countries seem attractive.

Other conditions **‘pull’** victims into trafficking. These are the conditions in regions or countries which create demand for inexpensive labour and for sex markets.

Q2: What is the difference between the push and pull factors for victims of THB?

Because of the diversity of traffickers and the variety of ways they organise their activities, victims can be more vulnerable to new and/or different recruitment practices used by traffickers. Whether ‘pushed’ or ‘pulled’ into trafficking, the coercion or force used by the traffickers ensures that their victims become tied to them, even though these ties or bonds may be invisible to those they come in contact with.

Traffickers use both force and fear to maintain these ties including:

- the threat of physical harm to the victims,
- the threat of physical harm to victims’ families or friends,
- developing the victim’s dependency on drugs which the traffickers supply,
- developing the victim’s dependency on alcohol which the traffickers supply.

In addition, victims might also be reluctant to report their situation because:

- they may be unaware of their human or legal rights.
- they fear that ‘the authorities’ will not believe them.
- they fear being deemed a criminal or complicit in their activities by the authorities,



Did you Know?

There are conditions which ‘push’ and conditions which ‘pull’ victims into trafficking.



Caution is needed when trying to identify a potentially trafficked victim. It is not a general observation but a process which requires looking for all the possible signs, asking appropriate questions, listening for information and discovering possible indicators of coercion, abuse and exploitation.

- they fear deportation back home and retribution when they get there,
- they feel ashamed of their situation,
- they believe they have no alternative means of financial support.

These circumstances ensure that victims remain trapped in the middle of the other key players as Figure 3.1 depicts. However, if hotel organisations and law enforcement agencies work together collaboratively to identify and report victims and their traffickers as suggested above, they will be in a better position to combat THB and help trafficked victims to become survivors. These collaborative efforts can help to cut the invisible ties that bind victims to traffickers and to secure higher conviction rates for traffickers.

Activity 3.1 The Invisible Ties of Trafficking

- Explain the reasons why convictions for THB are low.
- Describe the reasons why THB victims often go unreported.



Write your answers to Activity 3.1 here:

3.6 Summary

In this unit we identified:

- the key players in human trafficking in the hotel industry,
- the nature of the relationship between these key players, and
- the need for collaboration between hotels and law enforcement agencies to identify victims of THB and their traffickers to combat THB.



Unit 3 Answers

Question 1

While there is no such thing as a ‘typical trafficker’, women are often involved in trafficking, more so than in other types of serious crime. As we have seen, it is a profitable crime for traffickers and women can be attracted to it for that very reason.

THB victims, especially young victims, often consider women more trustworthy and as such, they can be effective recruiters. They are frequently used, often unknowingly, to recruit friends. Sometimes, as victims, they are co-opted into trafficking networks for these reasons.

Question 2

Push factors are those that make the victim vulnerable to traffickers such as poverty, unemployment, a limited education or social support and an unstable family life.

Pull factors are those that create demand for sex markets and for cheap labour.

Activity 3.1 The Invisible Ties of Trafficking

The reasons why convictions for THB are low include:

- poor or unreliable reporting systems,
- the hidden nature of the crime,
- limited capacity or resources to investigate trafficking incidents, and
- corruption.

These reasons are also linked to those that explain why THB victims do not report their situations. The key factors that explain these reasons are:

- the force used by traffickers,
- the dependency of victims on traffickers,
- the fear of victims.

Unit 4: How Can We Combat THB in the Front-Of-House?

In this unit we:

- identify signs or key red flags in different parts of the reservation cycle that could alert you to a potential trafficking situation,
- introduce the notion of the barriers model and apply to the victim’s journey in the front-of-house of the hotel, and
- suggest procedures, standards and policies which may be implemented in order to erect barriers to reduce opportunities for traffickers to do business.

4.1 How might you spot a suspected THB victim?

The requirement for movement and temporary accommodation mean that hotels are highly exposed to the likelihood or possibility of a suspected THB victim being in the business. Human trafficking is therefore very much a risk for the business.

A number of signs maybe detected in order to assist in the identification of a suspected THB victim. These relate to the activities and behaviour of guests and/or someone accompanying a guest as they enter, use the rooms and facilities and then depart the hotel.

In a hotel’s front-of-house you might identify signs in different parts of the reservation cycle, including pre-arrival, arrival stage, during occupancy, and at the departure stage. Usually a number of signals or key ‘red flags’ could alert you to a potential trafficking situation.

Pre-arrival

In pre-arrival there are a number of possible red flags that a reservations officer might be alerted to, such as:

- requests for private and/or isolated rooms,
- reservations made in names other than those staying in the hotel, and
- questions raised about hotel security procedures and/or room access.

All or some of these might be a sign of a trafficker wanting to bring in a THB victim.

Q1: At the arrival stage, what red flags might alert doormen/concierge or front-desk personnel, particularly when observing the appearance and behaviour of children and women?



Did you know?

Traffickers make block bookings, e.g., long periods at airport hotels, and then cancel so that they can traffic victims illegally using booking confirmations for visa purposes.



Write your answers to Question 1 here

The movements and behaviour of traffickers, as guests themselves might also cause concern. They might do one or all of the following:

- arrive with limited luggage or decline assistance with excessive luggage,
- park in isolated areas in the car park or surrounding area, or
- force those accompanying them to walk a significant distance from their car to the hotel entrance.

Arrival

Many of the red flags at this stage in the process relate to documentation. Traffickers are able to move and coerce vulnerable victims as a result of falsifying documents, using false social security or identity numbers and travel documentation. This reiterates THB very much as a criminal activity.

Activity 4.1

List examples of information and documentation required for check-in which might be viewed with suspicion about the identity of the guest and/or those accompanying them.



Write your answers to Activity 4.1 here:

Guests themselves may also act in ways that leads one to think that something is not quite right. They might keep a great distance from the front desk, try to hide who they are and refuse to answer questions or engage in dialogue with staff. Multiple room keys may also be requested for a single room. All these actions might act as red flags alerting you to a potential trafficking situation.



Occupancy

Guest movements around the hotel may lead you to identifying situations which you may label as red flags:

- young people loitering in public or external areas,
- young persons loitering with significantly older guests,
- guests coming and going from the hotel at unusual times,
- guests are frequent visitors to the property without an obvious reason for being there, and/or
- fire exits are used for entrance/exit to the hotel.

Did you know?

It is important to ensure that any evidence of a potential THB incidence is preserved and space treated as a potential crime scene

Guest activities and behaviour in the hotel bedroom may also alert you to potential THB:

- DND sign on the door throughout stay,
- stream of visitors to guest room, despite DND,
- excessive noise or evidence of parties,
- requests for extra towels and/or bedding,
- refusal of use of daily room attendant, and/or
- guest rooms found to contain large numbers of condom wrappers and/or drug paraphernalia.

Q2: What signals might you detect in terms of room phone calls, use of safe deposit and room service activities?



Write your answers to Question 2 here

Departure

On departure and at the point of checking-out, these are some key red flags that could alert you to a potential THB if the guest (although not exhaustive):

- has paid for all transactions in cash,
- has a willingness to pay for multiple nights in advance, particularly in cash,
- does not produce credit card that matches that used for booking,
- has large amounts of cash, and
- insists on paying cash for the room(s) and 'additional services'.

Caution is needed when identifying a potential victim. This is not just about simple observation; it is a more complex process involving multiple signals, asking appropriate questions, listening for answers and unveiling possible signs of coercion and exploitation.

Activity 4.2

Read the case study of Angelica and Estella. List some of the key red flags that might have alerted you to a potential THB situation.



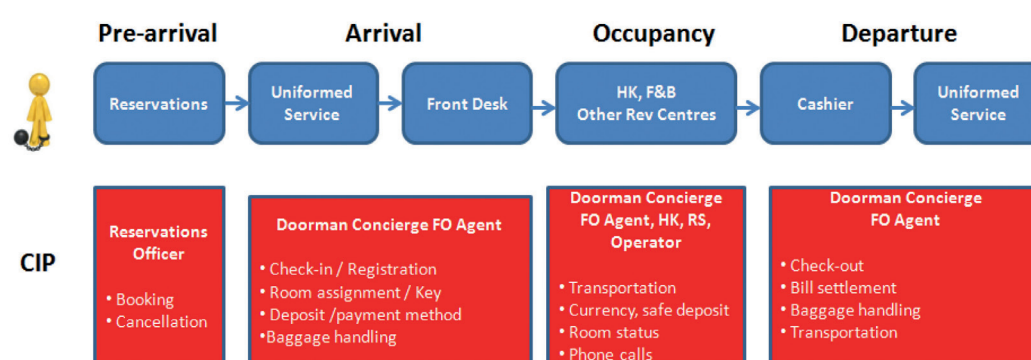
Write your answers to Activity 4.2 here

4.2 Erecting barriers to combat THB

Hotels provide both means and opportunity for traffickers. They are potentially involved in all phases of the front-of-house process, and in order to combat THB barriers need to be identified that aim to stop their activities. The Dutch Barrier model³⁰ examines THB as a business process identifying a number of critical intervention points that a trafficker must cross in moving a victim across or into a country and exploit them and suggests that if barriers are erected then the work of traffickers will be disrupted.

We have adapted this model in Fig. 4.1., plotting the trafficked victims' specific path through the reservations cycle in the hotel (in blue) and identified the possible critical intervention points that may reduce opportunities for traffickers to do business (in red). Policies, standards and procedures can be developed as potential barriers to reduce opportunities for traffickers to trade.

Figure 4.1 Trafficked victim's journey in the Front-of-House



We list below some of the procedures and standards which may act as barriers at the four main stages in the cycle. These relate to the signals we discussed in the previous section of this unit.

Pre-arrival stage:

	Signals	Procedures and standards providing barriers
Booking	Requests for private or isolated rooms.	Probes into the reasons given for this request. Ask guests if they are expecting visitors.
	Questions about hotel security procedures and/or room access.	Probes into reasons given for this request. Provide statements on hotel security and room access policies.
	Reservation not in name of person booking, not person(s) staying.	Require notification of all names and addresses of those staying in hotel.
	Unusual block bookings by third party distributors (e.g., long stay in airports).	Monitor cancellation rate of such bookings and identify origin.
Cancellation	Bookings cancelled after booking confirmation issued.	Collect all cancellations for follow-up purposes.
	Unusual block bookings by third party distributors (e.g., long stay in airports).	Monitor cancellation rate of such bookings and identify origin.

Activity 4.3

1. Complete the gaps in all the tables below with suggested policies and procedures which could act as barriers to traffickers.
2. Can you identify any further policies and procedures which could act as deterrents?



Write your answers to Activity 4.3 here

Arrival stage:

	Signals	Procedures and standards providing barriers
On-arrival	Behaviour of minors/ women arriving, intimidated, frightened, and/or distressed.	Ask politely whether everything is OK. Assign highly visible room and monitor behaviour more closely throughout the stay.
	Signs of physical abuse and exhaustion.	Ask politely whether everything is OK. Assign highly visible room and monitor behaviour more closely throughout the stay.
	Guests arrive independently or at different times.	(1 – Please fill in)
	Limited or excessive luggage and request for assistance declined.	If limited, then ask whether luggage will arrive later.
	Guest(s) parked in isolated area.	Request details of car and parking space. If possible, issue parking permits to guests and registered visitors cross-referenced to guest's registration details. Verify the plate number.
	Guest(s) dropped off at hotel at a significant distance from the entrance.	Ask the reason for not parking/ arriving at the front door. You can request that they pull the car around so you can verify the plate number.
	Different guests arriving with same taxi driver/cab number.	Keep diary entries of this occurrence, including verification of plate number.
	Guest name does not match booking.	Require passport and other identification documents.
	Guests who check in and stay for only a few hours.	Ask how many people will be staying in the room.

	Signals	Procedures and standards providing barriers
	Incomplete or unreadable information provided on the registration card, such as insubstantial address or illegible writing.	(2 – Please fill in)
	One person insists on signing in for the whole group.	Confirm all people staying in the room. Verification with photo identification documentation.
	Inconsistencies between I.D. and registration information, such as different dates of birth or home addresses.	Make sure that you see at least one photo I.D. per adult.
	Members of group keep distance from front desk.	Ask the whole group to sign in at the check-in desk.
	Guest refuses to make eye contact with staff.	Assign highly visible rooms to suspicious people. If you observe clear signs of criminal intent, refuse service.
	Guest refuses to answer questions/engage in dialogue with staff.	(3 – Please fill in)
	Adult guest travelling with child with no identification and/or do not appear related.	Child's identity must be clarified and contact numbers for parents confirmed. Take the issue up to senior management where a decision may be made.
	Guest tries to hide who they are on arrival.	Tell them that your hotel will not accommodate a person who is harmful for the hotel's reputation, has damaged hotel's property, is wanted by the police, is heavily under the influence of alcohol or other narcotics or has a record of an illegal act in other hotels.
	Guests arriving late without a reservation or photo ID.	Make sure that you see at least one photo I.D. per adult.
	Guests list a local address at registration.	Engage in conversation to probe for reasons for stay. Make sure that you see at least one photo I.D. per adult.
	Guests give a post office box as their street address.	Scan / Photocopy of Passport and Visa copy and attach to the registration card.
Room allocation	Multiple room keys requested for single room.	All key-users and their visitors must register at the office before entering the premises.
Baggage handling	Limited/ excessive or abnormal luggage and request for assistance declined.	Keep diary entry of this event.

Procedures can also be put in place in when guests are using hotel bedrooms and the other facilities of the hotel.

Occupancy stage:

	Signals	Procedures and standards providing barriers
Guest movements in the hotel	Young persons' loitering in public or external areas.	Ask security staff to make contact and probe the reason for their visit to the hotel.
	Young persons' loitering with significantly older guests.	Ask security staff to make contact and have a short discussion.
	Guests come and go from the hotel at unusual hours.	(4 - - Please fill in)
	Guests are frequent visitors to the property without an obvious reason for being there.	Ask security staff to make contact and probe the reason for their visit to the hotel.
	Signs of isolation and restricted movement as not leaving the room – unobserved in other areas of the hotel.	(5 – Please fill in)
	A steady pattern of male visitors who stay for a short while.	Keep diary entry of these events and engage in conversation wherever possible. Ask casual visitors about whom they are visiting and make note if they cannot quote guest's first and last names.
	Fire exits used as entrance/exit to hotel.	For required fire exits, make them "exit only" doors and consider converting them to alarm doors, suitable for emergency use only. The entrances that remain should be visible from the office, or monitored by closed circuit TV.
Phone calls	Numerous external phone calls to the room.	Keep diary of this event.
Currency/ safe deposit	All transactions with cash.	Hotel should require a credit card. If they wish to pay cash, they can pay at checkout. Take a cash deposit. A valid photo ID copy.
	Frequent use of safe deposit facilities.	Engage in conversation and advise that the hotel has more secure deposit facilities.

Room stage:

	Signals	Procedures and standards providing barriers
Room status	DND sign on door throughout stay.	The room should not remain without service for more than 24 hours, unless this is specifically requested by the guest and approved by the general manager.
	Stream of visitors to guest room, despite DND.	Where possible, all guests and their visitors should register before entering guest rooms. When guest refuses service a floor supervisor / duty manager / lobby manager should call the guest and arrange a convenient time for cleaning. If there is any suspicious or doubt about the room status or other incidents, then a Manager along with the security personal should knock and enter the room with the master key card.
	Requests for extra towels and/or bedding.	(6 – Please fill in)
	Refuses daily room attendant.	The room should not remain without service for more than 24 hours, unless this is specifically requested by the guest and approved by the general manager.
	Guest rooms found to contain large numbers of condom wrappers and/or drug paraphernalia.	Inform Security Staff and investigate.
Room service	Frequent room service requests paid for by cash; room service attendant refused entry.	The room should not remain without service/being entered by staff for more than 24 hours.
	Request for alcohol to a room where minors are present.	(7 – Please fill in)

Finally, in the departure stage, procedures should particularly be implemented around payment methods.

Departure stage:

	Signals	Procedures and standards providing barriers
Check-out/ bill settlement	Refusing to leave credit card imprint and/or wanting to only pay in cash.	If no credit or debit card, then a mandatory requirement is scanned copy of photo I.D.
	Does not produce credit card that matches that used for booking.	(8 – Please fill in)
	A willingness to pay for multiple nights in advance, particularly in cash.	Hotel should require a credit or debit card otherwise a mandatory requirement is scanned copy of photo I.D.
	Evidence of large amounts of cash.	Hotel should require a credit or debit card as guarantor.
Transport	Different guest (s) collected from hotel by same taxi driver/ cab number or another private vehicle.	Keep diary entry of this event and note vehicle plate number(s).

Over time, and with a now raised awareness of THB, the signals identified above should become second nature and the policies as standard practice. Many of the procedures are in fact already commonplace in many hotel organisations but it is worth being reminded of their relevance in combating trafficking as well as other crimes.

4.3 Summary

In this unit we:

- identified and discussed signs or key red flags in different parts of the reservation cycle that could alert you to a potential trafficking situation,
- introduced the notion of the barriers model and applied this to the victim's journey in the front-of-house of the hotel, and
- suggested procedures, standards and policies which may be implemented in order to erect barriers to reduce opportunities for traffickers to do business.



Unit 4 answers

Question 1

Red flags might include children and women arriving and appearing intimidated, frightened and/or distressed. They may also display signs of physical abuse and exhaustion. They may also arrive independently and at be very different times to their 'so called' companions.

Activity 4.1

Examples of information and documentation required for check-in which might viewed with suspicion about the identity of the guest and/or those accompanying them, include:

- guest names not matching booking,
- incomplete or unreadable information provided on the registration card, such as insubstantial address or illegible writing,
- one person signing in for the whole group,
- lack of photo I.D. and/or stories about lost I.D. Also, one member of a couple may show I.D., while the other refuses,
- inconsistencies between I.D. and registration information, such as different dates of birth or home addresses,
- adult guest travelling with child with no identification and/or do not appear related,
- guests arriving late without a reservation or photo I.D.,
- guests list a local address at registration,
- guests give a post office box as their street address.

Question 2

You might detect the following signals which may alert you to something not being right:

- numerous external phone calls to the room,
- frequent use of safe deposit facilities,
- frequent room service requests paid for by cash,
- room service attendant refused entry, and
- request for alcohol to a room where minors are present.

Activity 4. 2 Angelica and Estella Case study

Angelica, 22-years old & Estella, 35-years old who are both Filipino

Angelica's Story:

I began working as a domestic servant in the Philippines. After a few years I was recruited by an agency which sent me to Malaysia to work for Saudi princes. The agent turned out to be a trafficker. When I arrived in Kuala Lumpur my passport and mobile phone were taken from me. I lost all sense of my own identity and the links with my beloved family at home. Even worse – I was sold 11 times to different Saudi Arabian employers who took me all over the world with them. I was only paid about \$200 per month which didn't leave me with much left to

send to my family back home. A few months ago, I ended up in a hospital after being beaten black and blue by my current Saudi Prince because one day I failed to please him.

Estella's Story:

I was born in the northern Philippines province of Luzon, and I have a diploma in nursing. I left three of my five children in the village of Calatagan in 2013 to work in Malaysia as a domestic worker. My two older children, Celeste and Benedito, also work as domestic workers for some families in our province but their schooling is shouldered by their employers so they receive less than \$20 per month. I miss them but am happy that they go to school.

I am very good friends with Angelica because we both now work for the same prince. When we were on the road, travelling the world, I was not allowed to contact my family so she became very close to me. At one point I had not spoken to my children for over two years. Being quite a bit older, I had so far been lucky not to have been sexually abused by the prince.

Arriving in London (in Estella's words):

The Prince booked an entire floor of a luxury hotel for his family and us 'maids' (as he liked to call us) as he always did. Once we had unpacked the entire luggage of the family I asked for some hours off because I had seen a church near the hotel. I hadn't prayed for so long and was desperate to feel the lovely atmosphere of a church again –away from all my troubles. The Prince was offended with my request and beat me whilst he shouted "After Allah, here I am your God!". I knew he had hurt Angelica before but to also beat me! This was really enough; I didn't care anymore about anything I just knew I had to get away from him and his bullying family.

We were not allowed to leave the rooms in the suite and were told to clean the rooms ourselves rather than use the hotel staff. The staff at the hotel seemed so nice. They had even made a point of talking to us as if we were guests and not servants. We seemed like real people to them! I took Angelica with me on the day that the family were due to shop in Knightsbridge and went to see the person who seemed to be in charge of room cleaning – 'the housekeeper'. We told her, "We have been forced to work for the Prince and his family! We have been beaten and abused! We can't return home because he has our passports and is controlling our families and children. Please help us!"

Answer:

Possible red flags that these two women were in domestic servitude and were staying in the hotel might include:

- passports being held,
- signs of isolation and physical abuse,
- restricted movement as not leaving the room and not seen in other areas of the hotel,
- refusal of daily room attendant.

Activity 4.3

1	Guests arrive independently or at different times.	Probes into the reasons given for different arrival times.
2	Incomplete or unreadable information provided on the registration card, such as insubstantial address or illegible writing.	Require passport and other photo identification documents.
3	Guest refuses to answer questions/ engage in dialogue with staff.	Ask them to answer the basic questions that the hotel has to pose.
4	Guests come and go from the hotel at unusual hours.	Keep diary entry of these events and engage in conversation wherever possible.
5	Signs of isolation and restricted movement as not leaving the room – unobserved in other areas of the hotel.	Keep diary entries and engage with guests in rooms to check on safety/comfort etc.
6	Requests for extra towels and/or bedding.	Report incident to management. Ask how many people will be staying in the room.
7	Request for alcohol to a room where minors are present.	Check valid I.D. on delivery of all alcohol orders.
8	Does not produce credit card that matches that used for booking.	Scan / Photocopy of Passport and Visa copy and attach to the registration card.

Unit 5: How can we combat THB in the back-of-house?

In this unit we:

- identify signs or key red flags in different parts of the back-of-house that could alert you to a potential trafficking situation,
- suggest procedures and standards which may be implemented in order to erect barriers to reduce opportunities for traffickers to do business, and
- underline the importance of a fit and proper workplace.

5.1 How might you spot a THB victim?

The requirement for low cost products and services suggest that hotels are highly exposed to the likelihood or possibility of a suspected trafficked victim being in the business and its supply chain. The sector is often accused of 'turning a blind eye' to THB by outsourcing cleaning and catering services to dubious sub-contractors; employing migrant workers without appropriate due diligence, buying products produced by forced or bonded labour, labour exploitation or violation of labour rights; or by simply 'not noticing'.

Just as in the front-of-house activities, a number of signs maybe detected in order to assist in the identification of a presumed THB victim. Here the victim is likely to be a member of staff, either employed by the hotel or by another organisation in the extended supply chain.

In a hotel's back-of-house you might identify signs in different parts of the hotel operation, from the initial contracting of staff or procuring of goods and services right through to working alongside staff and means by which they are paid. Usually a number of signals or key 'red flags' could alert you to a potential trafficking situation.

Procuring goods

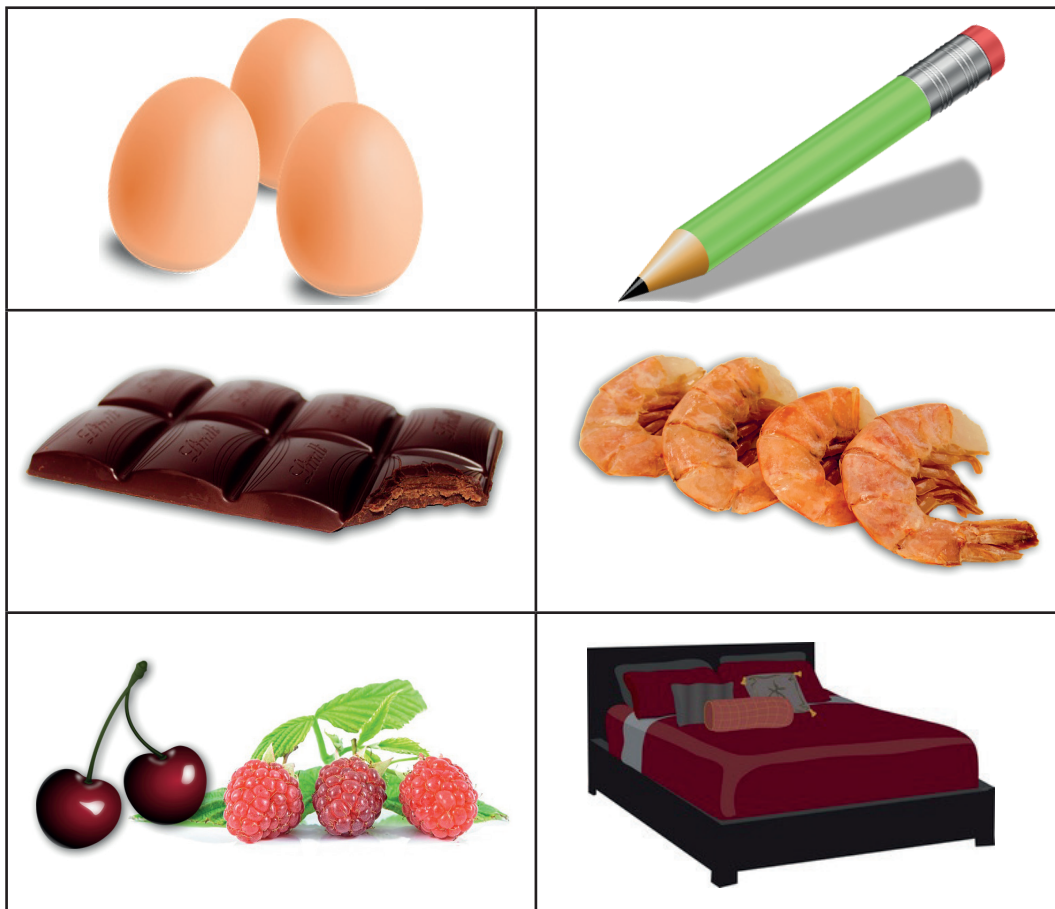
Cases of THB have been reported as a problem in almost every industry and sector. Because of this, it is important that those procuring goods (those products necessary for day-to-day business operations) and services are aware of their origin. Signals in the locating and purchasing of goods mainly relate to the unknown or unclear provenance of goods acquired. Purchasing managers, at every point in the hotel operation, may also be wary of exceptionally low-priced goods.

Activity 5.1

What products supplied to hotels could have been produced with trafficked labour³⁰? Select from the items below as to which you think could have been produced in this way.



Write your answers to Activity 5.1 here



Outsourcing and agency staff

Contracting services such as cleaning and security staff are now common place in hotels. Housekeeping services in particular, are more than often sub-contracted to agencies in large city-centre hotels. The organisation outsourcing such services is often motivated by the reduction in staffing costs and increased flexibility when hiring agencies. As a result of the requirement to supply low-cost services, these agencies may:

- operate unfair and unequal selection processes,
- employ migrant staff who are low paid and unfairly treated, and
- hire agency workers who appear to be without written contracts of employment and have had to pay direct or indirect fees to obtain work.

Worker's behaviour

As we have reiterated, signs of THB are so often hidden, making it very hard to recognise victims around us at work. Whilst not exhaustive, here is a list of some common signs which you should be aware of:

- physical appearance: victims may show signs of physical (bruises, black eyes, burns, scars) or psychological abuse, look malnourished, exhausted or unkempt, or appear withdrawn,
- isolation: victims may rarely be allowed to travel on their own, seem under the control, influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work,
- few or no personal possessions: victims may have no identification documents, have few personal possessions and always wear the same clothes day in day out. What clothes they do wear may not be suitable for their work,
- restricted freedom of movement: victims have little opportunity to move freely and may have had their travel documents retained, e.g., passports,
- unusual travel times: they may be dropped off/collected for work on a regular basis either very early or late at night, and
- reluctant to seek help: victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear law enforcers for many reasons, such as not knowing who to trust or where to get help, fear of deportation, fear of violence to them or their family.

In terms of their quality of work, they may be unable to perform normal working tasks due to signs of physical abuse, may behave erratically and might have an unusually high level of absenteeism. Conversely, they may be very willing to undertake excessive overtime and/or continuously work unsociable shifts.

www.telegraph.co.uk/sponsored/lifestyle/modern-slavery-britain/11096711/Victims-of-modern-slavery-do-not-wear-a-label.html



Did you know?

We can also include construction services in this category, keeping in mind the diverse property base of the hotel industry. The construction industry is frequently featured in media exposes on THB in the global economy.



This short film, produced by the UK Home Office in addition to its evocative TV advert, tells you how to spot potential victims of slavery in Britain

Activity 5.2

Assume you have the opportunity to speak with a victim of forced labour privately, without jeopardizing the victim's safety because the trafficker is watching. List examples of questions that you might ask to follow up on the red flags you have become alerted to.



Write your answers to Activity 5.2 here

Documentation and payment

One indicator of human trafficking is the lack of control that the victim has over their documentary identity and earnings. This is often manifest in the following:

- Has few or no personal possessions,
- Is not in control of his/her own money, no financial records, or bank account,
- Is not in control of his/her own identification documents (I.D. or passport), and
- Is not allowed or able to speak for themselves (a third party may insist on being present and/or translating).

It is very often the case that someone else – usually the trafficker or their representative - is holding these legal documents and is in control of their money. This lack of legal and financial independence makes victims even more vulnerable, forcing them to remain in their situation.

As is the case with most of these red flags, they may not be present in all trafficking cases and are not cumulative. It is probably not just one aspect that alerts you, but an amalgamation of them, and they may be observed overtime.

5.2 Erecting barriers to combat THB

Fig. 5.1 below illustrates the victim's journey in the back-of-house (in green) and identifies critical intervention points or CIPs (in red) where the THB victim may come in contact with the hotel and/or its suppliers. As we have learnt in the previous unit, this is where policies, standards and procedures can be developed which provide barriers to reduce opportunities for traffickers to trade – disruption being the most effective way to combat trafficking.

Figure 5.1 Trafficked victim's journey in the Back-of-House



We list below some of the procedures and standards which may act as barriers at the different stages in the cycle. These relate to the signals we have discussed in the previous section of this unit.

<http://dhaka-principles.org>



Outsourcing tender/bid Specifications/Contract award:

	Signals	Procedures and standards providing barriers
Procurement	Agency or supplier recommended for charging significantly low cost.	Request for Quotation (RFQ) to comply with Employment Law and Dhaka Principles. Use indicative pricing statistics to assess quotations and fees from such agencies.
Supplier Due Dilligence Checks	Unknown/unclear provenance of goods purchased or exceptionally low priced goods.	Due diligence checks on company records and tax payment evidence – including references. Require supplier sign company’s Business Ethics Code of Conduct.
	Exceptionally low-priced goods.	Due diligence checks on company records and tax payment evidence – including references. Make supplier sign company’s code of conduct.
Staff Agency Contract Award	Staff recruited and selected on basis of recommendation only without RFQ process – unfair and unequal selection processes.	Compliance with Dhaka RFQ competitive process with defined set of selection criteria.
	Migrant staff are low paid and unfairly treated.	Compliance with Dhaka Principles. Audit all employees’ documents, check-up of valid papers and interview of employees, mandatory background checks.
	Agency workers appear to be without written contracts of employment and have had to pay direct or indirect fees to obtain work .	Undertake in depth background checks on labour agencies including where agency is operating in a supervisory role.

The Dhaka Principles are the set of human rights based principles to enhance respect for the rights of migrant workers from the moment of recruitment, during overseas employment and through to further employment or safe return to their own countries.

Staff clock-in:

	Signals	Procedures and standards providing barriers
Documents	Staff appearing to have no identification documentation.	Ask for all identification as a necessary security measure on entering the premises.
Behaviour	Reserved/isolated and distant when arriving at the property for work.	Observe behaviour and engage with employee.
	Always dropped off by same vehicle and never independently arrives at work. May arrive very early or late at night for shifts.	Engage staff member in friendly conversation about journey to work and check home addresses etc.

Staff on-duty:

	Signals	Procedures and standards providing barriers
Appearance	Signs of physical abuse (bruises, black eyes, burns, scars) or maltreatment (extreme exhaustion or malnutrition).	Observe appearance, behaviour and engage with employee.
	Few personal possessions and always wearing the same clothes day in day out (what clothes they do wear may not be suitable for their work).	Observe appearance, behaviour and engage with employee.
Behaviour	Erratic or withdrawn behaviour of staff member.	Observe appearance and engage with employee.
	Willingness to undertake excessive overtime and/or continuously work unsociable shifts.	Make sure employees know their statutory rights.
	Unusually high level of absenteeism.	Engage with employee.
Level of socialisation	Isolated and unwilling to integrate with rest of the staff.	Talk to colleagues, observe behaviour first-hand and engage with employee.
Quality of work	Unable to perform normal working tasks due to signs of physical abuse.	Observe performance and engage with employee.

Staff clock-out:

	Signals	Procedures and standards providing barriers
Documents	Staff appearing to have no identification documentation.	Ask for identification as a necessary security measure on leaving the premises.
Procurement audits	Question appearance, behaviour and/or performance of staff (as above)	Audit suppliers internally or engage third-party monitor to evaluate potential risks of THB in supply chain.

5.3 A fit and proper workplace

The overall guidance in terms of the workforce is to scrutinise and monitor your relationships with staff and external agencies; engage with your workforce and colleagues and ensure that a fit and proper workplace is being provided³¹.

Organisations may wish to undertake their own initiatives, or work together in collaboration to promote a fit and proper workplace. One example has recently been launched:

Leadership Group for Responsible Recruitment: The Coca-Cola Company, HP Inc., Hewlett Packard Enterprise, IKEA and Unilever launched this collaboration, focused on promoting ethical recruitment and combating the exploitation of migrant workers in global supply chains across industries. The five founding companies have committed to the ‘Employer Pays Principle’, which states that no worker should pay for a job - the costs of recruitment should be borne not by the worker but by the employer. For many people around the world, the search to earn a better living leads them to find work away from home. The promise of higher wages abroad, however, can in some cases result in exploitation, with many low-skilled workers in particular paying high recruitment fees, incurring large debts, and potentially finding themselves in situations of forced labour.

The Leadership Group, supported by IHRB, the Interfaith Center on Corporate Responsibility, International Organization for Migration and Verite, will be championing the ‘Employer Pays Principle’ within their own industries and beyond, calling for similar commitments from other companies to drive positive change across all sectors.

The Leadership Group will also work together over the coming months to develop a practical roadmap to underpin this call to action, a valuable tool for companies as they report under the UK Modern Slavery Act, California Transparency in Supply Chains Act and the US Federal Acquisition Regulation (FAR).

Remember that victims may avoid eye contact, appear frightened or hesitant to talk. They often do not know who to trust or where to get help and may fear deportation and violence to them or their family. The next unit provides detailed advice as to what to do if you suspect there is a THB in your workplace and how to protect them.

www.ihrb.org/news/leadership-group-responsible-recruitment.html



5.4 Summary

In this unit we:

- identified signs or key red flags in different parts of the back-of-house that could alert you to a potential trafficking situation,
- suggested procedures and standards which may be implemented in order to erect barriers to reduce opportunities for traffickers to do business, and
- emphasised the importance of operating a fit and proper workplace.



Unit 5 answers

Activity 5.1

Option 1- you selected between 1 and six items. You are correct as each of the items you have selected have been the subject of trafficking allegations in recent years. The correct answer is to select all six items as they have all been tainted by reports of THB in different economies and in different countries around the world. They are amongst thousands of items bought by hotels.

Option 2 – you selected all items and you are spot on!

All of the items have been the subject of THB allegations in recent years in different economies and in different countries around the world. They are amongst thousands of items bought by hotels, often bought primarily on the basis of low cost. As these cases illustrate the origin of these products should give us cause for concern.

Activity 5.2

Examples of questions that you might ask to follow up on the red flags you have become alerted to include.

- Can you leave your job if you want to?
- Can you come and go as you please?
- Have you been hurt or threatened if you tried to leave?
- Has your family been threatened?
- Do you live with your employer?
- Where do you sleep and eat?
- Are you in debt to your employer?

Unit 6: Protecting Victims

In this unit we:

- examine what needs to be done if a potential trafficking situation takes place in your organisation in order to guarantee the victim's immediate safety and protection,
- propose an intervention protocol, and
- recommend the policies that should be in place, including short-term awareness anti-THB training for all staff and the appointment of a designated, trained go-to-person known as the 'Anti-THB champion'.

6.1 How does one interact with THB victims?

In the two preceding units, we have pointed to some of the signs that might lead us to believe that a person is a THB victim. As a reminder, the victim may be someone who has been sexually exploited, forced into criminal acts, accompanying a hotel guest, a member of staff or someone who is on the premises as a result of forced criminality, e.g., they have been coerced into committing theft or soliciting within the hotel. You should be aware of the fact that victims are often in a precarious and vulnerable physical and psychological condition.

When interacting with a victim of THB it is recommended that you bear in mind their circumstances. For example, they might:

- have a lack of knowledge regarding their legal rights: many of them have precarious education, and/or do not know the local language,
- come from families and/or communities strongly affected by severe poverty, violence and abuse: therefore, having not known a different reality,
- be confronted with debt bondage: often victims are threatened directly or through their families by traffickers who have lent money to them, paid for their trip abroad or who have paid their initial and subsequent rents (food and accommodation), generating a debt situation from which they feel there is no way out,
- have been forced to commit illegal acts (anything from begging to illegal border crossing, prostitution, drug dealing). Therefore, they are often afraid that they might be charged with criminal offenses,
- have developed emotional attachments towards the recruiter or the trafficker (often known as "lover boy") because of their initial background (e.g., coming from an emotional unstable environment),
- feel ashamed of 'having been fooled': a situation that often describes male victims of trafficking for labour,
- be afraid of the reactions that their community might have when finding out about their situation (including their families, law enforcement, community groups and so on),
- be pressurized by the precarious situation at home: the person may want to carry on working to send money home regardless of their poor situation,

- be monitored and threatened by the trafficker: the trafficker is often a person who is part of a network in the origin country, that might know and threaten the family of the victim or other persons s/he is attached to, be it in the origin or the destination country, and
- have had previous encounters with the police: Often in the country of origin, but not always, that might have not had the desired outcome (e.g., the case was not pursued), due to the influence that criminal networks sometimes exercise over the local police.

For some or all of these reasons, they might be unaware of the reality of their situation and even be unwilling to receive support. In the worst case scenario, they will try very hard to leave.

Any attempt at intervention needs to be considered in light of the cooperation procedures with law enforcement as well as with appropriate not-for-profit organisations (NGOs). The latter often provide immediate as well as long-term assistance, including legal support. Your organisation may have a list of, reputable, vetted NGOs from whom the designated Anti-THB champion can ask for support.

It is also important to keep in mind that having to deal with such a situation can be stressful to anyone. Sometimes, for the reasons explained above, the person who is dealing with the potential victim might feel frustrated because of being unable to help as much as they would like to. It can become time-consuming because of the necessary internal procedures or because of lengthy interviews during the investigation stage.

6.2 What are the rights of THB victims?

Much effort has been made at European level to protect THB victims and provide assistance and support from the moment that the competent authorities have reasonable grounds to believe a person might have been trafficked. It is also recommended that the Anti-THB champion or a designated person in the team, is informed, so they have a broader understanding of the situation.

Victims are entitled to support before, during and after criminal proceedings. It is important to bear in mind that they are entitled to:

- support whether or not they willingly cooperate in a criminal investigation,
- assistance and support from the authorities only with the victim's full, informed consent (this can be problematic where a victim is a minor),
- translation and interpretation services,
- access to confidential victim support services which are acting in their interest and free of charge,
- treatment which does not victimize them further (secondary victimization), such as causing them to be re-traumatized by unnecessary repetition of interviews, visual contact with the perpetrator or unnecessary questions about their private life, and
- under certain conditions, be accompanied by someone of their choice who can help them understand their situation when first in contact with the authorities (unless this would be against the interests of either the victims or any criminal proceedings).

From a legal perspective, victims are also entitled to information on:

- the type of services or NGOs to whom they can turn for support,
- the type of support they can expect to obtain,
- how they can obtain protection,

- how to gain access to free legal advice, legal aid or other types of services, and
- how they can report an offence (this is particularly important in countries where law enforcement is less trusted by the population).

6.3 What steps should be taken in supporting a presumed victim?

We recommend the following seven key steps in terms of supporting a presumed victim.

Step 1: Provide shelter and privacy

Find a secure and private place where the person can remain until s/he is referred to law enforcement, with the help of your line manager and the anti-THB champion.

This could be a room that prevents the person from being seen by others as well as offering her/him some privacy. It is recommended that the person is not left alone and, if possible, does not make or receive phone calls. Although you might feel that s/he is entitled to inform family or friends of their situation, you should keep in mind that traffickers often have total control over communication facilities or/and due to the psychological state of the person s/he might try to contact the trafficker themselves. Therefore, it is advised that getting in contact with families or friends is best left to after the arrival of law enforcement.

Please be prepared, as explained above, that presumed victim/s might not wish to be 'rescued', to cooperate and may even try to leave.

Step 2: Inform your line manager and/or your anti-THB champion:

Immediately inform your line manager and/or the anti-THB champion who should be trained to offer support in this situation. If your organisation does not have a designated and trained member of staff, you should contact your immediate line manager. It is recommended that you follow up on your notification in order to be informed about its outcomes.

Step 3: Inform law enforcement:

The line manager or the anti-THB champion should contact law enforcement by calling the emergency number in your country. If the trafficked person's life is not in immediate danger, the manager or anti-THB champion might be redirected to a local branch of law enforcement. It is important that law enforcement have a record of the call and that they can contact your organisation for additional information if needed at a later stage.

If the victim is working in the property, they may have possessions – e.g., a locker with personal items. These belong to them but may also contain valuable evidence and therefore need to be kept intact until the arrival of law enforcement.

It is advisable that as many details as possible are remembered regarding the incident related to the victim (i.e., when s/he arrived, if s/he was accompanied and by whom, the length of the stay and so on). This is particularly important if the presumed victim does not want to wait the arrival of law enforcement.

Step 4: Ask for (additional) professional support

Your manager or the anti-THB champion will aim to deploy additional staff members for immediate support should that be the case (e.g., if there is more than one person in need of help). In addition, it is strongly recommended that



It is important to ensure that any evidence of a potential THB incidence is preserved and space treated as a potential crime scene.

Try to make a brief note of all details rather than waiting until you have to complete an incident report.

s/he contacts an appropriate NGO anti-trafficking organisation that can support the victims immediately and further monitor and assist them.

As with law enforcement, when asking for outside support you should be able to give as much information about the trafficked person as possible regarding gender and presumed age, ability to communicate in the local language (or any other, if necessary or point out the need for interpretation) and any other immediate needs (such as food, clothes and medical assistance).

Step 5: Provide water and food

During the time of her/his waiting for the law enforcement and other consequent measures (e.g., testimonies) you should be able to provide the presumed victim with access to water and, if possible, to food as victims often suffer from prolonged hunger.

Step 6: Assess general well-being:

Many THB victims have developed, as a result of trauma, severe medical conditions which might reduce their capacity to understand their situation or ability to react. In these circumstances, they might experience severe stress and, as a result, try to escape or harm themselves. You should look for signs of physical and psychological vulnerability (as discussed in the previous units). Please bear in mind that often, due to trauma, fear or exhaustion, victims may seem absent-minded and might experience difficulties answering simple questions such as “what is your name?”, “where are you from?”, etc. It is, though, equally important to know that there might be exceptions but the victim will still require professional help and possibly medical care.

Step 7: Complete the necessary internal forms:

After you have checked all the above steps, you should complete the appropriate form(s) to report the incident within your organisation as soon as possible, in order to be able to remember as many details as possible. This should be done even if the trafficked person decides to leave.

General recommendations:

1. Pay attention to those signals which will help you to identify a trafficking situation.
2. Make sure you remember the contact details of the anti-THB champion and that you have them at hand should they be needed.
3. Get informed about human trafficking and offer support when needed as trafficking often happens in unexpected places. A good starting place would be to look over the websites provided as resource at the end of this unit.
4. If possible, find out more about the work of local organisations that are fighting human trafficking and support their prevention efforts.

6.4 Summary

In this unit we have:

- recommended an intervention protocol and policies that must be in place should a trafficking situation be identified,
- emphasized the need for an informed collaboration between the business, law enforcement and NGOs to best support a THB victim, and
- detailed the circumstances and some specifics of a trafficked victim that could better prepare a team to respond to this type of crisis situation.



Please be aware that in some countries, informing the police of a potential criminal activity that might endanger the life of a human being you witness or are aware of is considered a citizen’s responsibility and failing to do so could be a criminal offence.



Often victims of human trafficking are minors although their physical appearance, due to the situation endured, might not give that impression. Keep in mind that you should not rely only on physical appearance when trying to assess age; it is important to remember that exploitation of minors is a major offence and in their case consent is never to be assumed.



Conclusion

Trafficking in human beings (THB) is a serious risk for a hotel as well as society as a whole. Although there are several efforts and attempts throughout Europe to combat this criminal activity, THB is growing and assuming worrying dimensions. It is considered as the 'slavery of our times'. Whilst we may estimate there to be more than 115,000 trafficked victims annually in the European hospitality industry, the hidden nature of this crime means actual numbers are likely to be very much higher.

By completing this training, you have displayed your commitment to better understanding and appreciating this risk and its potential impact on your hotel.

We are hopeful that this training has served its purpose of driving an operational plan for combating human trafficking. The responsibility very much comes from the top; management needs to exhibit a dedicated commitment to a carefully designed and implemented anti-THB programme. The industry is in the unique position of being able to identify and confront this criminal activity and support the reintegration of survivors into society.

Your hotel could take a leading position in this COMBAT!

Further resources

- www.redcross.eu
- www.antislavery.org
- www.ecpat.org.uk
- www.payoke.be

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