

COMBAT

Trafficking in Human Beings in the Hotel Industry



Reference Guide for Senior Hotel Management



A BRAND

CENTRUL RAȚIUI PENTRU DEMOCRATIE



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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 million workers, spread out across 1.7 million enterprises¹, traffickers and organised criminals are looking for opportunities to exploit a sector perceived to be largely defenceless to, sometimes even complicit with, 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 portfolio of hotels may be impacted in a number of ways:

- (1) They could be venues for the sexual exploitation of adults and children and/or used to accommodate victims as part of the human trafficking journey;
- (2) staff in your hotels could be victims of human trafficking, having been recruited or subcontracted via dishonest agencies; and/or
- (3) products and services supplied to hotels 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 preventive and practical, step-by-step guide for hotel organisations to proactively fight THB. It seeks to help the prevention of trafficking in human beings in your business, to mitigate your exposure to this criminal activity and, most importantly, to enable your organisation to assist with the reintegration of trafficked survivors back into society.

This reference guide, targeted at regional and senior management, offers recommendations for the development of policies aimed at counteracting and, if present, disrupting trafficking. It also forwards guidelines for reporting procedures, developing an effective anti-THB communication strategy and supporting victims at operational levels. It advocates participation in anti-THB initiatives and the apportionment of appropriate resources in alleviating THB risks.

Whilst you may be aware of the reputational and legal risks of human trafficking, these threats are dwarfed by the moral obligation we have towards the victims and survivors of this form of slavery. Working through this reference guide should be the first step towards helping to eradicate this form of modern-day slavery in your business.

How to Use this Guide

This reference guide consists of 11 Units which bring together what Senior Hotel Managers and Anti-THB Champions 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 seven THB cases in the toolkit available for trainers to use as they deem appropriate in order to better illustrate the points they chose to make during their sessions. These case studies are described in one-page texts and illustrated in PowerPoint in sets of 10 slides per case. The cases support wider training sessions or can be used separately for targeted training or refresher sessions. As a guiding point, each case study should take approx. 30 mins to discuss.

Key to symbols used in the document



Key point



Information



Did you know?



Written activity or question



Weblink



Summary



Answers to activities and questions

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Unit 1: What is Human Trafficking?

In this unit we:

- 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?

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 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,
- servitude,
- removal of organs,
- forced begging,
- illegal adoption,
- forced marriage.

Activity 1.1 Karla's case study

- 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.

Appendix 1 is at the end of this Unit

Write your answers to Activity 1.1 here:



THB involves:

- coercion
- vulnerability
- exploitation



1.2 The extent of THB

Determining the extent of THB is not easy for a number of reasons. Different legal definitions, reporting systems and 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, 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

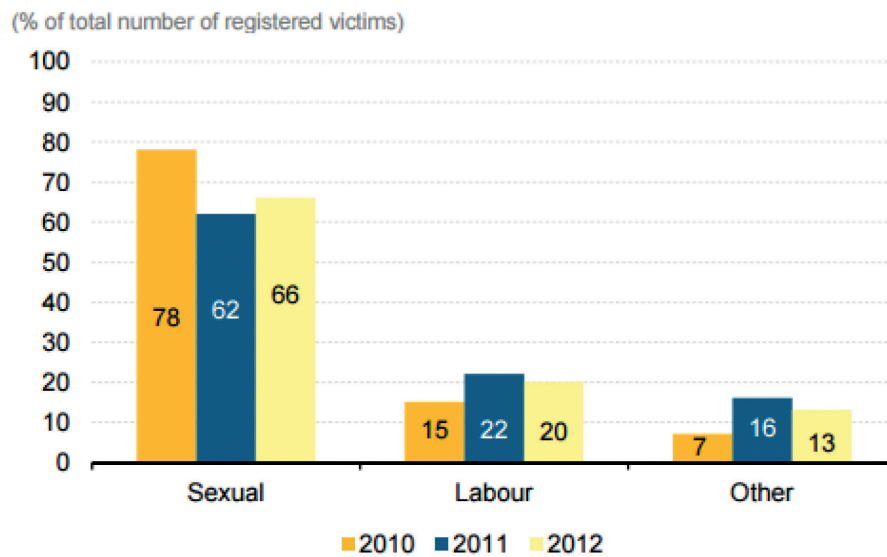
Number of THB Victims	Source
40,177	UNODC (2014) : victims between 2010 and 2012 ⁵
30,000,000	Crane (2013) ⁶
21,000,000	ILO (2012) ⁷

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

1.3 Exploitation and victims of THB

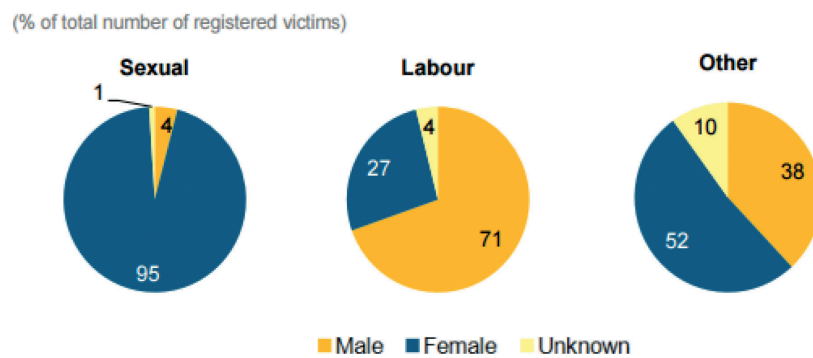
According to data collected by Eurostat⁸ from EU member states, the majority of THB victims are trafficked for **sexual exploitation (66%)**, followed by **forced labour (20%)** and **other forms of trafficking (13%)** as shown in Figure 1.1 below.

Figure 1.1 Registered victims by type of exploitation



THB is a highly gendered crime as Figure 1.2 below shows.

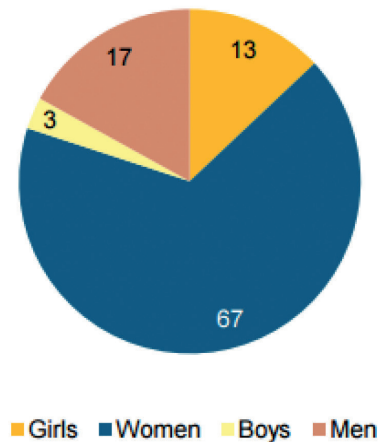
Figure 1.2 Registered victims by gender and type of exploitation (2010-2012)



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

THB can also 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)

Activity 1.2 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?



The majority of female victims trafficked for sexual exploitation.

The majority of male victims trafficked for labour exploitation.

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.

Although most reported cases are transnational, in reality however, trafficking happens everywhere. Most victims are trafficked close to home, within the region or within their country of origin, and their exploiters are often fellow citizens.

Q2: How might the knowledge of trafficking flows assist hotels in combating THB?



Smuggling is a violation of the state.

THB is a violation of the person.

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 them 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 and 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.



Key differences:

- consent
- exploitation
- transnationality

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?



Did you know that there are more slaves today than in any other time in history?

1.7 Summary

In this unit we identified that:

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



Unit 1 answers

Activity 1.1 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 variance in the figures reported, these include:

- different legal interpretations of THB and the classification of crimes, and
- different ways of collecting and recording data.

Activity 1.2 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.



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



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.

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

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.

Polaris¹⁴, the US National Trafficking Resource Center, reports that:

- hotels and motels are the second most popular venues 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 Polaris¹⁶,

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.



Write your answers to Activity 2.1 here:

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 they are 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 that the official statistics on THB are gross underestimates of the true extent of THB¹⁶.

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.
- 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.

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.



You can check your answer to Activity 2.1 at the end of this Unit



Did you know?

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



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

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

- 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:

- two factors that make the hotel industry more vulnerable to sex trafficking,
- two 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 trafficking¹⁹.

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,
- 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, and
- a decline in hotel/brand profitability.

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.

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



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



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 and disseminating best practices. Another notable initiative in this area is the anti-trafficking 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.

Activity 2.5 Signing 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’.

- Name five hotel companies who are top members of the Code.
- What 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,
- identify the relationships between the key actors, and
- identify how these relationships influence THB victims.

3.1 Human traffickers

Human trafficking is one of the fastest 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 in different type and sizes of organisations 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 this. 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 types 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.)



Write your answers to

Question 1 here:

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),
- the reliance on victims to testify in court, and
- 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)²⁸

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,



Did you Know?

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



Write your answer to Question 2 here.



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 being deemed a criminal or complicit in their activities by the authorities,
- 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: Taking a Risk-Based Approach to Combating Human Trafficking

Having understood the crime of human trafficking, its main actors and the hotel industry vulnerabilities traffickers may exploit, in this unit we:

- look at how a risk-based approach to combating THB offers a structured and systematic framework that enables hotel organisations to focus their resources on high-risk properties,
- the different levels and types of responsibility within the organisation according to this approach, and
- what are the different steps that organisations should be taking when following this framework.

4.1 Risk-based approach

Human trafficking is a global crime in which criminals often use hotels to exploit their victims. Hotel organisations need to identify the vulnerabilities that traffickers are taking advantage of, strengthen their safeguards and protect their integrity by providing their hotel properties with the necessary tools to combat this crime. To be more effective in doing so, they need to analyse and seek to understand how this crime may be taking place within their premises and the extent to which their different units are potentially susceptible to it.

By viewing THB as a risk to which hotel organisations are exposed, they can group their properties into high, medium or low-risk categories, based on variables such as location, size, service-level, target market, etc. all of which may increase or decrease the perceived risk of THB. Hotel properties can be evaluated on a case-by-case basis, with risk assessments carried out depending on the level of detail needed. The depth of controls to be implemented will depend on how big the THB risk is perceived to be.

4.2 How is THB a risk?

Human trafficking can be analysed from a business perspective as a risk with varying degrees of strategic, operational and reputational implications and must be addressed with the active engagement of all levels of the hierarchy.

Risk is *the probability of damage, injury, liability, loss, or any other negative occurrence that is caused by external or internal vulnerabilities, and that may be avoided through pre-emptive action*. It is the *'cumulative effect of the probability of uncertain occurrences that may positively or negatively affect business objectives'*²⁹. Risks are inevitable as long as vulnerabilities exist in the organisation and its environment.

The business objectives that could be impacted negatively by THB may include:

- revenue, profitability and share value targets,
- achievement of corporate social responsibility goals,
- conducting business in accordance with defined ethical standards,
- compliance with all sectoral, national and international legal and regulatory frameworks,
- avoidance of litigation and fines,
- protection and championing of the corporate reputation.



What is risk?
How can THB
be a risk to the
business?

Activity 4.1

Human trafficking is often reported as a risk but in different ‘disguises’: operational, financial, legal, reputational and social. In which one of these categorisations do you think that THB falls?



Write your answers to Activity 4.1 here:

4.3 The Three Lines of Defence Model

A systematic and best practice approach to help delegate and organise risk management is the Three Lines of Defence model³⁰. It provides a wider look at business operations, helping to assure the on-going success of a risk-based approach to THB, and it is appropriate for any hotel organisation — regardless of size, scale or complexity. Even in organisations where a formal risk management framework or system does not exist, the model can enhance clarity regarding risks and controls and help improve the effectiveness of risk management systems.

The Three Lines of Defence model distinguishes among three organisational groups (or lines) involved in effective risk management:

- Functions that own and manage risks
- Functions that oversee risks
- Functions that provide independent assurance

Each of these three lines plays a distinct role within the organisation’s wider governance framework.

As the **first line of defence**, local operations managers own and manage risks. They are also responsible for implementing corrective actions to address process and control deficiencies. With regards to THB, they should be in charge of developing, implementing and embedding mitigation policies and standards, including monitoring and reporting, training staff and maintaining a certain level of vigilance on a day-to-day basis. In a perfect world, perhaps only one line of defence would be needed to assure effective risk management. In the real world, however, a single line of defence can often prove inadequate.



Did you Know?

Human trafficking does not always involve travel to the destination of exploitation: 44% of the victims of forced labour moved internationally, while the majority (56%) were subjected to forced labour within one country (often their own country of origin).

Figure 4.1 Three Lines of Defence Model

1st line Business Units	<ul style="list-style-type: none"> involved in day-to-day risk management follow a risk process apply internal controls and risk responses
2nd line Risk and compliance	<ul style="list-style-type: none"> oversee and challenge risk management provide guidance and direction develop risk management framework
3rd line Audit	<ul style="list-style-type: none"> review 1st and 2nd lines provide an independent perspective and challenge the process objective and offer assurance



The three lines of defence:

- Business Units
- Risk and Compliance
- Independent Audit

The **second line of defence** normally comprises the legal, risk management, internal audit and senior (regional) operations management functions. This line translates the laws into compliance obligations and assists operational management to identify its THB risk exposure. It helps operational management to develop and implement policies and standards to mitigate the THB risk based on the Board’s policy statements. It monitors local operational management’s control of the THB risk providing objective challenge and support and advises on compliance with policies.

The second line of defence serves a vital purpose but cannot offer a truly independent analyses to governing bodies regarding risk management and internal controls, hence the recommendation that independent assurance is the **third line of defence**. Establishing an independent, objective assurance on the overall effectiveness of the anti-THB design and operation of internal controls (mitigation activities and tracking and monitoring activities performed by the first and second lines of defence) should be a governance requirement for all organisations. This is not only important for larger and medium-sized organisations, but may be equally important for smaller entities, as they may also face complex environments with a less formal, robust organisational structure to ensure the effectiveness of its governance and risk management processes. In the franchise estate of hotel chains, for example, this maybe a requirement or a suggestion that is available, for an additional fee, to franchisees.

All three lines should exist in some form in every organisation, regardless of size or complexity, because risk management is normally strongest when there are three separate and clearly identified lines of defence.

Activity 4.2

In your organisation identify the persons and units that would be the first, second and third line of defence against THB.



Did you Know?

According to the 2015 State Department Trafficking in Persons (TIP) report, there were only 10,051 prosecutions and 4,443 convictions for trafficking globally in 2014.



Write your answers to Activity 4.2 here:

4.4 What does a risk-based approach offer?

A Risk-Based Approach to THB means that the organisation is expected to identify, evaluate and fully understand the THB risks to which it is exposed both within its properties and in its supply network and to develop policies and standards (measures and controls) in order to mitigate these risks effectively (Fig. 4.2).

The risk-based approach will include training, implementation and embedding of these policies and standards in the day-to-day operation of the organisation (enterprise-wide risk management – ERM); and the establishment of a compliance process which will include auditing, testing and reporting actions and structures.

This approach is not a “zero failure” one; there may be occasions where the organisation has taken all reasonable measures to identify and mitigate THB risks, but some traffickers may still be able to exploit people within its properties.

Figure 4.2 The Risk Management Cycle



The Risk Management Cycle:

- Risk identification
- Risk evaluation
- Risk treatment
- Training and implementation
- Monitoring and reporting

4.5 Summary

In this unit we identified:

- the benefit of taking a risk-based approach in combating human trafficking,
- the different lines of defence against it, and
- the five steps of action that organisations need to take to combat THB.



Unit 4 answers



Activity 4.1

If you have answered “all of them” you are spot on!

THB is an **operational risk** because an incident of trafficking within a hotel and the ensuing investigation will cause disruption in operations that may last for days or weeks and if there is further prosecution perhaps even months and years. It can have financial consequences (**financial risk**) for the hotel and the entire organisation as a result of business interruption (loss of staff productivity, room capacity if a crime scene) and loss of business at property level from customers that do not approve tolerance to prostitution or other forms of human exploitation. It can be a **legal risk** with implications when one or more hotel properties are held culpable of illegal employment practices or complicit with third party labour exploitation. It can become a broader **reputational risk** with various stakeholders including corporate customers, shareholders and investors disassociating themselves from a company perceived as being complicit with or showing tolerance to such a criminal activity. Most importantly it is an **ethical and social risk** because human trafficking is a crime against society and any form of facilitation (willing or unwilling) is morally unacceptable.

Activity 4.2

Your answer will vary with the size and structure of your organisation. However, you should come up with names and units as follows:

- for the first line of defence persons and units that have to manage THB as a risk (line operations),
- for the second line of defence persons and units that oversee THB as a risk and provide the right structure and resources to control it and combat it,
- for the third line of defence, persons and units that can that can provide independent assurance.

Unit 5: The Risk Assessment Process

In this unit we go a little bit deeper in the risk assessment process by:

- understanding the different stages of this process,
- exploring the range of factors that influence the likelihood and impact of a THB incident in a property (risk profiling), and
- practising the use of certain tools such as heat maps and trafficked victim journey blueprints in order to identify areas of intervention within the organisation.

5.1 Risk assessment

An in-depth understanding of the THB risks to which an organisation is exposed is the foundation of effective efforts to prevent or mitigate THB and will inform the development, implementation and maintenance of effective anti-THB policies and standards.

The foundation of identifying and prioritising risks is known as risk assessment and is defined as:

“... the quantitative, qualitative, or hybrid assessment that seeks to determine the likelihood that an adversary [the human trafficker] will successfully exploit a vulnerability and the resulting impact to an asset.”³¹

The nature and scope of the THB risk assessment process will vary depending on the size of the organisation, its activities and the geographical markets it serves.

The outcome of the risk assessment will determine the proportionality of the organisation's response in terms of resourcing, mitigating actions and anti-THB standard operating procedures to be developed and implemented.

The exposure to THB risks may evolve over time therefore the assessment of risk and the response to those risks should be an ongoing process.

There are two key stages in the risk assessment process: risk identification and risk evaluation.

5.2 The risk assessment process

Although different companies may use different terms the broad consensus is that **risk identification** is the stage which aims to identify, characterise and -where appropriate- quantify a set of risks. On the other hand, **risk evaluation** is the stage which seeks to evaluate the significance of those risks, with regards to their likelihood (probability) of occurrence and their potential impact on the organisation.

In the risk identification stage, a comprehensive catalogue is generated with all THB risks to which the organisation could plausibly be exposed by virtue of its hotels' location, its business model and the nature of its operation (services).

With regards to the location of operations the organisation may use country reports generated by anti-THB NGOs, state organisations or consulting companies.

Another useful source could be the 'Google Earth' map provided with this toolkit which presents the most common routes human traffickers are using to transport their victims (Figures 5.1 and 5.2).

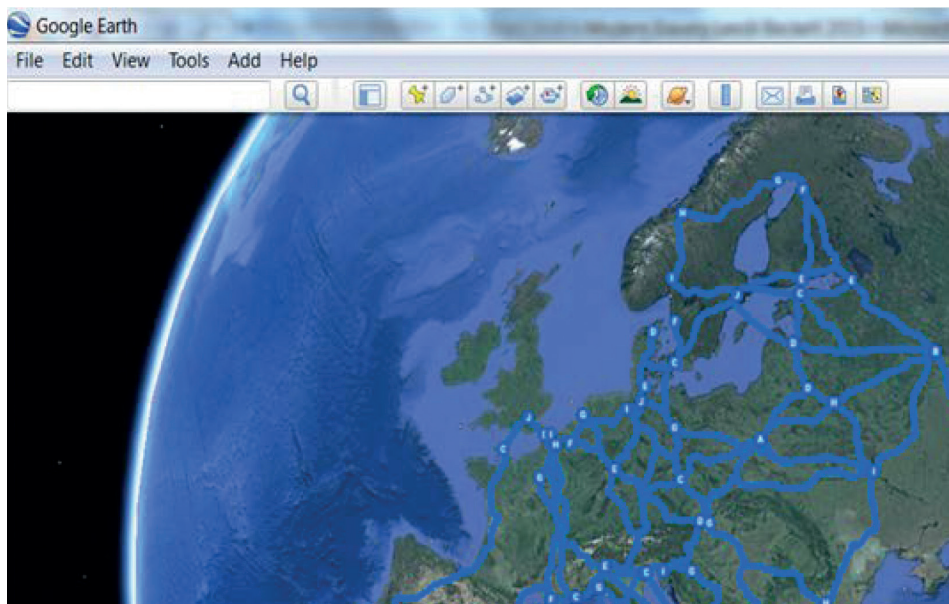


Figure 5.1 European routes of THB

The organisation may plot the location of its hotels in Europe as a separate data layer, identify which of its properties are close to or on these routes and determine their risk profiles.



You can access Google Earth and the trafficking routes in the CD included in this toolkit.

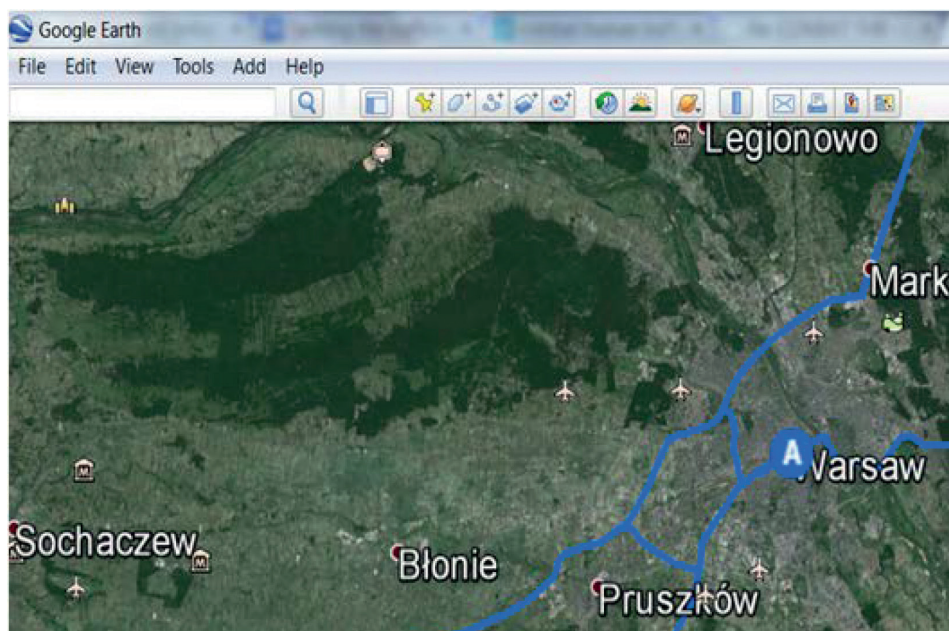


Figure 5.2 Trafficking routes in Europe (zoom detail)

Activity 5.1 Using Google Earth

Using the Google Earth maps in this toolkit plot the locations of 1-5 of your hotels and identify how close they are to known human trafficking routes. Which ones do you think are high-risk properties? Which medium and low-risk? Why?



Write your answers to Activity 5.1 here:

The development and implementation of appropriate operational policies and procedures that mitigate THB risks will be determined by a clear and specific understanding of the level of risk in each property (risk profile). Another helpful approach is to step back and take a fresh look at the overall operation of the hotel (or hotel group).

Some of the questions to be asked may be the following:

- What do we do as a business and what is our business model?
- Do we operate in a range of markets that are significantly different from each other with regards to THB (from a political, economic, socio-cultural and legal perspective)?
- Do we do business in countries where we are more likely to be exposed in THB risk?
- What interactions with the business environment do our activities involve and who do we interact with?
- What are the third parties that may expose our business to THB and how?

In the risk evaluation stage the organisation seeks to determine which risks are of most significance to it and prioritise them accordingly. The key variables in a risk evaluation are two: likelihood (probability) of occurrence; and impact. With regard to THB risk, this can be done at different levels:

- THB risk versus other crime and fraud-related risks: This is an evaluation which can show the correct positioning of THB within the wider crime-risk matrix and against all other major risks in the organisation’s risk register,
- risk of one form of THB versus another form of THB: this evaluation will attempt to differentiate between individual forms of THB, if these can be meaningfully differentiated,
- hotel property or geographic market risk: in addition to comparing individual forms of THB, an organisation might want to compare levels of THB risk exposure between units or between regions depending on what is most appropriate for the organisation and its operations.

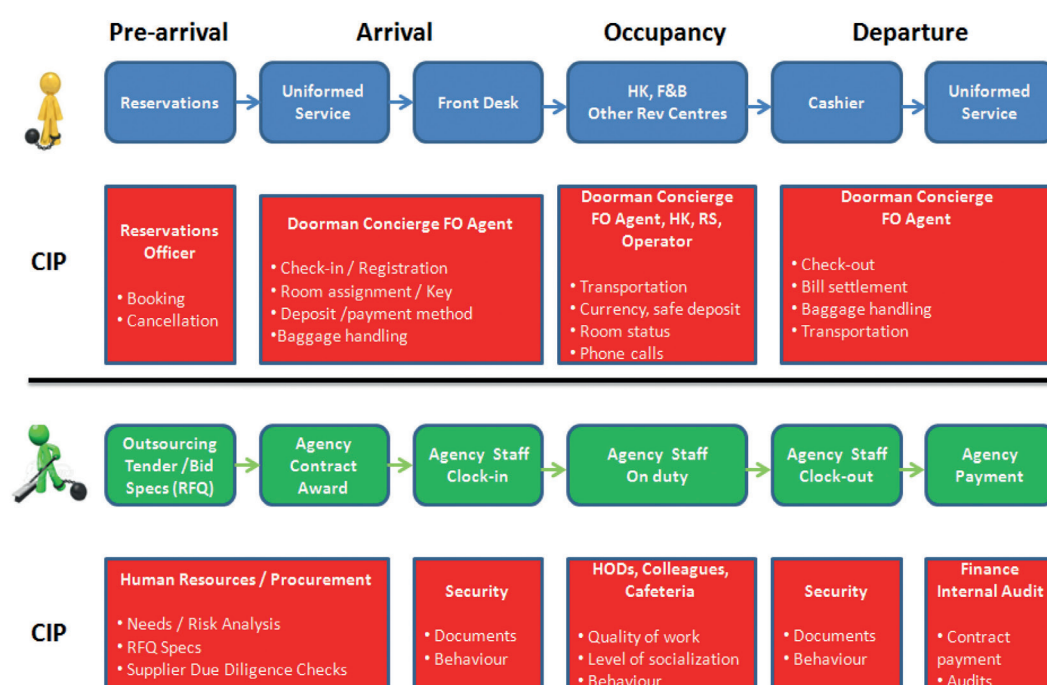
The evaluation may be a sophisticated quantitative or a less sophisticated qualitative one. In the end of the process, however, it will produce a ‘Heat Map’ which may look like the one in the following Figure:

Figure 5.3 Criminal risks heat map

	Hotel A	Hotel B	Hotel C	Hotel D
Data, privacy breach, cybercrime	Medium	Medium	High	High
Bribery and corruption	Low	Medium	High	Low
Fraud, theft	Medium	High	Low	High
Human trafficking	High	Low	Medium	High

A further useful step in order to identify possible vulnerabilities is to look at where THB interfaces with the hotel front- and back-of-the house and the possible journeys of trafficked victims within a hotel.

Figure 5.4 Trafficked victim's journey in a hotel



This would be particularly useful in identifying critical intervention points where signals of THB would be detected and possible countermeasures could be implemented.

One approach for doing that is presented in Fig. 5.4. As hotels provide both means and opportunity for traffickers, in order to combat human trafficking, barriers need to be identified that will disrupt their business process. Figure 5.4 describes the trafficked victims' specific path through a hotel – via four stages or touch points (in blue for the front of house and in green for the back of the house). It identifies the possible critical intervention points (CIPs) that may reduce opportunities for traffickers to do business (in red).

5.3 Business model implications

Today, doing business without the ownership of the property asset is the preferred strategic choice of the major hotel groups. This development mirrors the trend in international business per se where non-equity alliances have become an increasingly important component of corporate strategy. As a result of doing business 'asset-light', a group's affiliation with hotel properties tends to be through a franchise and/or management contract or an even looser attachment such as a marketing agreement (e.g, hotel collections). These different models have implications for the control of hotel operations and their management of THB as a risk. The additional prevalence of outsourcing specific hotel operations to outside suppliers enhances the risks of THB. Some of the consequences of these business models are as follows:

- the employment, management and development of staff at the property level are the responsibility of external agents,
- the responsibility for the delivery of brand standards and policies is left to franchisees, third-party managers and suppliers,
- the delegation and organisation of risk and reputation management at the business level ultimately falls to those who are often only loosely coupled with the organisation.

Activity 5.2 Evaluating THB risk in your hotel portfolio

Develop your own heat map in order to determine the THB risk exposure of your hotel portfolio. You should evaluate both the likelihood (probability) of occurrence and impact and compare the units accordingly.

A further way to develop this comparison is to evaluate the risk of the different forms of THB at each unit and then to compare across the portfolio.

Before doing this, what will influence your control of each unit, impacting upon your ability to manage THB as a risk?



Write your answers to Activity 5.2 here:

5.4 Summary

In this unit we looked at:

- the different stages of the risk assessment process,
- the range of factors affecting the likelihood, and impact of a THB incident in a property (risk profiling),
- the effect of the organisation's business model on the controllability of this risk,
- how we can use certain tools to identify areas for intervention within the organisation.



Unit 5 Answers



Activity 5.1 Using Google Earth

Your answer will of course vary according to your organisation. Proximity to a known human trafficking route does not necessarily mean that the hotel is vulnerable or high-risk. However, it is a factor that needs to be considered alongside the location of the hotel, the service-level, the market segment it serves, etc. The criteria for this classification will largely depend on the organisation's characteristics.

Activity 5.2 Evaluating THB risk in your hotel portfolio

In terms of what will influence your control of each unit:

1. The business model used:
 - a. High control with owned/leased and operated units
 - b. Medium control with managed units
 - c. Low control with franchised units
2. There will also be medium control of outsourced services which are delivered on site (although more control can be instigated with the development of the procedures discussed in this section).
3. There is likely to be a lower control of goods purchased in the supply chain (although more control can be instigated with the development of the procedures discussed in this section).

Unit 6: Communication and Training

In this unit we will:

- explore the characteristics of an effective anti-THB training and communication strategy,
- identify the role and responsibilities of anti-THB Champions.

6.1 Internal communication and training

The policies and standards developed to mitigate the THB risk have to be communicated across the organisation and relevant training will be required to ensure their effective implementation.

Q1: What would be possible demonstrable outputs of effective internal communication?



Write your answers to Question 1 here:

The training plan at each level of the organisation will need to be proportionate to the identified risks. Similarly, at unit level, they have to match the risk profile of each hotel. The plan will need to ensure that all training activities are on-going, regularly updated and that training completion rates are properly monitored and recorded. It will also need to address how anti-THB policies and standards are implemented in practice in all relevant functions of the organisation. Depending on their business model, organisations may choose either to train certain groups of management and staff (e.g., in owned, leased and managed properties) or encourage them to ensure that appropriate training arrangements are in place (e.g., in franchised hotels).

The general approach to anti-THB training in a hotel organisation could be to:

- provide good quality, standard training on THB risks, awareness and reporting for all staff,
- provide additional, more detailed anti-THB policies and standards training for staff in higher-risk functions (e.g., recruitment, procurement, etc.) and locations (e.g., gateway hotels),
- ensure that staff responsible for training others have sufficient training themselves,
- ensure that training offers practical examples of THB risk and covers relevant policies and standards,
- test staff awareness of THB and understanding of relevant policies and use the results to assess individual training needs and the overall quality of the training,
- maintain staff records setting out what training was completed and when,
- provide refresher training (it should not be viewed as a 'one-off' event) and ensure that all training material is kept up-to-date with legislative changes, internal or external case law and sectoral or general best practice.

Activity 6.1 Evaluate your anti-THB training

Using the table in Appendix 6.1 evaluate the level of your anti-THB training and communication.

Appendix 6.1 is at the end of this section



Write your answers to Activity 6.1 here:

A key person in the communication and implementation of anti-THB programme and training within individual hotels will be a designated specialist, the anti-THB Champion. This person may be a manager but can equally be a line employee. This person must be knowledgeable of all organisation's policies and standards related to THB and must have received specialist training with regards to helping and treating victims as a first responder.

6.2 The anti-THB champion

Being an anti-THB Champion means being an advocate for good anti-THB practices within the organisation; and being passionate, interested and willing to learn about THB issues which are impacting at a local, national and global level.

The Champions at unit-level should be part of a network of internal volunteers who have a keen interest in combating THB and have received specialist training in dealing with potential victims.

What should they do?

- be a point of first contact for staff on THB issues, particularly in the case of the identification, support and protection of a victim.
- be a point of first contact for third-parties on THB issues,
- make staff in each area of the business aware of the risks of THB,
- work with other champions to promote good anti-THB practice,
- be part of the development and delivery of anti-THB training programmes,
- identify and suggest opportunities for improvement in the procedures, policies and standards implemented by the hotel,
- provide feedback from staff to the management on anti-THB initiatives and training,
- provide feedback to other staff and managers on progress in implementing anti-trafficking programmes,
- be able to liaise with other champions across the hotel portfolio.

6.3 Summary

In this unit we have looked at:

- the characteristics of an effective anti-THB training and communication strategy,
- the role and responsibilities of an anti-THB Champion



Unit 6 Answers

Question 1

There are a few demonstrable outputs of an effective internal communication programme, among which you may consider:

- a good level of awareness of both front- and back-of-the-house THB risks among all employees,
- sensitivity to these risks across the organisation with effective monitoring and reporting of possible signals (red flags),
- ability of operational management to invoke the relevant incident management procedures when appropriate.



Activity 6.1

The answer will vary depending on your organisation.

Appendix 6.1 Evaluate your anti-THB training

Approach to anti-THB training

1. Good quality, standard training on THB risks, awareness and reporting for all staff.	
2. Provision of additional, more detailed anti-THB policies and standards training for staff in higher-risk functions (e.g., recruitment, procurement, etc.) and locations (e.g., gateway hotels).	
3. Training of staff responsible for training others.	
4. Training offering practical examples of THB risk and covering relevant policies and standards.	
5. Staff tested on their awareness of THB and understanding of relevant policies and the results used to assess individual training needs and the overall quality of the training.	
6. Staff records maintained setting out what training was completed and when.	
7. Refresher training undertaken to ensure that all training material is up-to-date with legislative changes, internal or external case law and sectoral or general best practice.	
8. Involvement of third parties e.g., suppliers, contractors, franchisees, owners etc., in training.	
Total Score : Out of 80	
Areas for Improvement:	
1. _____	
2. _____	
3. _____	



Evaluate how far your organisation has developed this aspect of training from 1 (non-existent) to 10 (highly developed)

Unit 7: Monitoring and reporting

In this unit we will:

- highlight the importance of monitoring the effectiveness of the anti-THB programme.
- underscore the need of extending it to third parties acting for, and on behalf of, the organisation.
- provide examples of internal and external reports and management information required to ensure effective execution of the programme.

7.1 Why is monitoring needed?

An effective anti-THB programme must be able to work in practice. It is a key management responsibility to monitor its effectiveness in preventing and/or mitigating the risk of human trafficking throughout the business functions of the organisation and its appropriateness as the environment and organisation evolve.

The Internal Audit should be able to integrate this task with their existing role by auditing and, perhaps, challenging the implementation of policies and standards, commissioning external independent audits and monitoring external indicators including media coverage. The results and findings of this process should be periodically reported to the organisation's Audit Committee or, if this does not exist, to its Executive Board (Senior Management Team).

To facilitate this process, senior management will need to consider:

- defining what high-level controls it expects to see within the organisation (general behaviours, evidence of policy implementation, key operational standards);
- specifying the management information (in the form of KPIs – see Appendix 7.1) it seeks to obtain to ensure the anti-THB programme is operating effectively
- defining its compliance / internal audit / operational risk monitoring programme and identifying and resolving any overlap of responsibilities between different functions

7.2 Third parties

Effective implementation must extend to third parties acting for, and on behalf of, the organisation (suppliers, agents, contractors, franchisees, intermediaries, consultants) and, ideally, all these must be suitably vetted and assessed for their anti-THB practices. Of course, the extent of the vetting/due diligence will depend on the nature of the third party relationship.

Activity 7.1 Lukas' case study

Read the case study in Appendix 7.2 and watch the relevant video

<http://tinyurl.com/j5ezvvd>

Lukas was a victim of bonded labour. However, he was working in the supply chain of fast-food chains and major supermarket chains. What specific procedures and standards do you suggest putting in place which may act as barriers to this situation occurring in your supply chain?

The organisation's policy statement on THB should be communicated to third parties with a clear message that any form of human trafficking will not



watch the video

be tolerated. While there are practical limitations to the degree to which an organisation can monitor and influence third parties, one way to address this challenge is by using appropriate clauses when contracting these parties. Such clauses might cover, for example:

- acknowledgement of the organisation's code of conduct, anti-THB policy statement and of the relevant to them anti-THB standards,
- confirmation that the third party has equivalent policies and the necessary procedures to implement them,
- provision for periodic self-certification of the third party,
- provision in appropriate circumstances for the organisation to have some form of audit rights over the third party,
- provision of probation period for remediation in case of non-compliance by the third party, and
- right of termination in case of non-compliance after the probation period.

7.3 Reporting

To ensure the effective and meaningful communication, both internally and externally, of the results of the anti-THB programme, the organisation will need to establish an appropriate reporting regime. The format and frequency of reporting will depend on a range of factors, including the size and complexity of the organisation, the needs or requirements of the target audience (stakeholder) and the purpose of a particular report (e.g., whether it is just a monitoring report or an incident report).

Reports for internal stakeholders may include:

- periodic updates for the Board on the status of implementation of the anti-THB programme,
- reports summarising internal audit and/or compliance monitoring findings,
- reports of any alleged or actual breaches and the scope and findings of any investigation.

Reports for external stakeholders may include:

- report on the organisation's risk assessment,
- report on the organisation's overall anti-THB strategy,
- report any alleged or actual incident to law enforcement.

7.4 Management information

As part of any monitoring and review activity, consideration will need to be given to appropriate management information that will be needed for it. Practical examples of the type of management information that management could draw upon include:

- recruitment and hiring practices,
- update of recommendations from previous monitoring reports,
- anti-THB Champion (or equivalent) appointed,
- training completion rates (new staff and refresher),
- strategic supplier due-diligence and audit reports,

- other third party due-diligence and audit reports,
- third-party non-compliance reports,
- incident reports,
- anti-THB whistle-blowing trend analysis,
- internal audit findings in relation to Anti-THB programme or standard operating procedures weaknesses.

These types of management information are typically produced monthly for management meetings, aggregated quarterly for board-level meetings and are used to inform the annual Chief Compliance/Risk Officer reports.

Management information may be qualitative as well as quantitative. Appendix 7.1 presents a range of KPIs that may be used for the reporting of the anti-THB programme effectiveness both internally and externally.

Activity 7.2 Reporting in my organisation

Looking at the KPIs presented in Appendix 7.1:

1. Which are used by your organisation? Who is responsible for collecting and reporting this information?
2. Which COULD be used by your organisation? Who would be responsible for collecting and reporting this information?
3. Are there any other KPIs that you think would be useful in this type of reporting?



write your answers to Activity 7.2

7.5 Summary

In this unit we have discussed:

- the importance of monitoring an anti-THB programme,
- extending the effective implementation of a programme to third parties,
- the requirement for internal and external reporting,
- the management information needs for monitoring and reporting.



Unit 7 Answers

Activity 7.1 Lukas' case study

1. You could request that any quotation (RFQ) for such products comply with Employment Law and Dhaka Principles (see the note below).
2. If the products are being offered at very low costs you could use indicative pricing statistics to assess the quotation and fees of the outsourcing agency, if used.
3. Due diligence checks could be made on company records and tax payment evidence – including references.
4. Suppliers could be required to sign the company's Business Ethics Code of Conduct.

Note: 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.

<http://dhaka-principles.org>

Appendix 7.1 Indicative key performance metrics for and anti-THB programme

Anti-THB Culture	<ul style="list-style-type: none"> • Quality and clarity of Anti-THB policy statement vs best practice statements • Annual budget allocated to Anti-THB policy implementation / best practice • Prominence of Anti-THB policy in corporate strategy and reporting / best practice • # of Anti-THB programmes/initiatives supported by the company • # of properties adopting Anti-THB policy / total # of properties in portfolio • # of strategic suppliers complying with Anti-THB policy / total # of strategic suppliers • # of expert contacts in external Anti-THB networks
Training	<ul style="list-style-type: none"> • # of (operational/management/corporate) staff undertaking Anti-THB training per year/ total # of staff at O/M/C level • Person-hours spent on Anti-THB training per year/ total # of staff • Hours of Anti-THB training at O/M/C* level per year/ total hours of training at O/M/C level • Cost of Anti-THB training at O/M/C level per year / total cost of training at O/M/C level • # of updates of learning database per year • # of third-parties participating in training (e.g., suppliers, agents, distributors, franchisees, owners)



Visit the website and explore the relevant principles

People engagement	<ul style="list-style-type: none"> • # of trained Anti-THB staff / property • # of anti-THB Champions / total portfolio • Level of engagement (number of consultations, events) of individual properties with external expert advisors and NGOs / total # of properties in portfolio
Process	<ul style="list-style-type: none"> • % of properties risk assessed for THB per year / total # of properties in portfolio • Anti-THB budget allocated per 'hot property' per year • % of SOPs reviewed in Rooms Division / F&B / Facilities Mgmt. / Human Resources Management / Procurement based on Anti-THB policy
Communication	<ul style="list-style-type: none"> • Level of engagement (visits, hours spent, downloads) of individual properties with intranet pages on THB • Availability (% of time within a year) of internal organisation-wide THB communication platforms • Availability (% of time within a year) of third party THB communication platforms
Incidents	<ul style="list-style-type: none"> • # of suspected cases reported internally / # of cases reported to law enforcement • # of cases reported to law enforcement / # of cases prosecuted • # of cases reported through internal communication platforms / # of cases reported through third party platforms
Auditing	<ul style="list-style-type: none"> • Levels of THB awareness among staff (through Employee Opinion Survey) • Levels of awareness and of trust in available reporting structures on THB (through Employee Opinion Survey) • # of property audits performed on Anti-THB compliance / total # of properties • % of compliance to Anti-THB SOPs in Rooms Division / F&B / Facilities Mgmt. / Human Resources Management / Procurement per audited property • # of strategic suppliers audited for THB / total # of Tier-1 Suppliers • # of outsourcing agencies audited for THB / total # of outsourcing agencies employed

(*): Operational, Management, Corporate-level staff

Appendix 7.2 Lukas' case study

I was 19 when first heard of the opportunity to come to the UK to work in the agricultural sector. I already had lots of experience of working on my family's farm in Lithuania. I had been brought up from a very early age to help out in looking after the livestock on the farm; mainly cattle and sheep. I thought that working abroad would enable me to send some money back to me parents, they were struggling to make ends meet on the farm, and I could save up to have my own farm one day.

I spoke to a friend of mine who said that an agency in Vilnius could secure me a job in return for paying them a percentage fee out of my wages. I applied and was told to turn up in the capital city in two days' time to be provided with a work visa and plane ticket. What an adventure! I was astonished, therefore, to find myself joining 30 other men one cold morning in October on a rickety bus that would take us eventually to the North of England. It was a long journey, but we finally arrived at a very large egg farm. This is where things went downhill!

This farm in Northumberland was not the only place where all 30 of us worked. We were driven literally around the whole of the UK, changing location sometimes after a few days, sometimes after a few weeks. We worked back-to-back eight-hour shifts for days and days at a time. Working as egg catchers, the conditions were often dangerous. I thought I would be working alongside nice farming folk like my parents but instead we were assaulted and abused by the Lithuanian supervisors.

These were not nice people; they often didn't let us sleep or take toilet breaks and repeatedly withheld payment from us. I say 'payment' but really we got a pittance and were often told that if we didn't continue to work our families would suffer back home. They kept our passports and said that the majority of our wages were going back to the agency to pay for our passage over to the UK and the opportunity of work. Some opportunity, it was torture! They even used fighting dogs to intimidate us and to get us to stay in the horrible farm outbuildings when not working where the mattresses on the floor were riddled with bedbugs. We were sometimes given nothing to eat so we had to pilfer eggs and were forced to eat them raw.

Just think how surprised I was when one day I found out that the company we worked for supplied the free-range eggs, at a low cost, we were collecting to fast-food chains and major supermarket chains.

Unit 8: Partnerships and Networks

In this unit we will:

- highlight the importance of the development of partnerships and networks in relation to combating THB,
- identify examples of current partnerships between businesses at global, national and regional levels as well as partnerships between different members of local communities.

8.1 Developing partnerships

Increasingly stakeholders put pressure on corporate boards to move beyond mere policy statements and develop partnerships and networks with other businesses and organisations in order to combat THB at a global, regional and local level. Such partnerships not only demonstrate good business practice but respond to a growing trend among hospitality businesses from all parts of the world to make a public anti-THB commitment and foster the development of in-house learning, management capacity and leadership to combat THB.

An anti-THB partnership is a formal arrangement with one or more business or third sector organisation where common strategies and goals related to combating THB are defined, long-term commitments are made, and risks and rewards are shared. Such partnerships are necessary because they offer organisations the expertise and resources necessary to supplement existing in-house knowledge and capability, as well as fresh thinking and new approaches to address human trafficking across all business functions.

When choosing a partner, the Board needs to make sure that partners:

- share a long-term vision and an intent to effect significant change in addressing human trafficking and its survivors,
- converse with potential partners early, before any formal agreement – both to shape the strategy and to test how they might work together,
- understand each other's particular culture and pressures and avoid making assumptions,
- set clear targets for the partnership primarily focusing on outcomes and define specific measures of success,
- agree exit strategies in the unfortunate event that the partnership does not work out,
- share successes and lessons learned from the partnership.

Visit Atest's website at:

<https://endslaveryandtrafficking.org>



Did you Know?

The Alliance to End Slavery and Trafficking (Atest), the Child Labour Coalition and the Cotton Campaign are all examples of cross-sector anti-THB co-ordination. For example, Atest, an alliance of 12 US based groups including the Polaris Project, Verité and the International Justice Mission, has been praised for its work surrounding the Trafficking Victims Protection Act through the US senate.



Visit Atest's website

8.2 Sector Partnerships

Partnerships at this level involve businesses within the same industrial sector, such as the example provided below:

International Tourism Partnership (ITP)

The International Tourism Partnership (ITP) aims to drive responsible business practice within the global hotel industry. ITP's Human Trafficking Working Group has developed resources to help hoteliers understand and address the risks of THB. Recognising the growth of THB as a criminal activity, and the hotel sector as high-risk in relation to THB, this partnership advocates that there should be no threshold of tolerance to THB. It therefore advises hotels and hotel companies to take steps to avoid their business being open to trafficking. ITP brings members together to share best practice and develop practical resources to help hotel members to tackle THB. ITP maintains strong connections with government, investors, academia and specialist non-profit organisations to ensure they keep learning and keep driving the agenda on this key issue. Their Youth Career Initiative (YCI) programme helps to re-integrate survivors of trafficking into the workplace by offering training opportunities at hotels in India, Ethiopia, Mexico and Vietnam.

Visit ITP's THB website at:

<http://tourismpartnership.org/human-trafficking>



Check long-term vision and compatible values, agree performance metrics and exit strategies, and celebrate successes



Visit ITP's THB website

8.3 Local community partnerships

Partnerships at this level comprise members from government or public sectors and those of private business. In the UK, as in other countries, a number of local community-based partnerships have been developed. One example of this type of partnership is identified below:

Oxford Hotel Watch, 'Say Something if you See Something'

This partnership is between the Thames Valley Police, Oxford City Council, Oxford County Council, local hoteliers and guest house owners. Its aim is to engage the local community to work collaboratively to help protect children and vulnerable people from abuse and exploitation. Efforts to establish this initiative began in the aftermath of Operation Bullfinch, a local police operation that resulted in the successful conviction of the criminals responsible for child sexual exploitation in an Oxford guesthouse.

This partnership emphasises the key role that hoteliers and other accommodation providers should play in helping to fight against THB. It highlights the importance therefore of training hotel staff to be aware of the potential signs of exploitation. Staff members also need to 'be curious' and if they suspect something then it is also important that they, 'don't look away'. They may be able to provide law enforcement officials with information that may be a 'vital part of a jigsaw' in helping the victims of THB and in bringing the criminals responsible to justice.

8.4 Partnering with an NGO

A 'best practice' approach is for organisations to identify national and/or regional NGOs who work with, and for, trafficked persons. These NGOs can provide information, specialist support and access to a wide range of other support services. For example, they may provide specialist support for traumatised victims or offer access to legal or translation services. Some NGOs work with a particular type of trafficked person, e.g. minors or victims from a specific ethnic or cultural group.

Partnerships with these NGOs should provide organisations with:

- advice and guidance to help to develop appropriate organisational policies,
- staff training and updates on anti-trafficking legislation, prevention and awareness campaigns,
- support and guidance when a trafficking incident occurs,
- emotional and psychological support for victims, which can make a tremendous difference,
- interpreters to provide support for victims,
- access to food and clothing for victims, and
- advice for victims on rebuilding their lives; e.g. on immigration laws, accommodation, personal finance, access to healthcare, language lessons and employment.

These support agencies are vital in supporting survivor's reintegration into society. By helping survivors to rebuild their lives, they are therefore less likely to be vulnerable to future exploitation. The following section provides some examples of NGOs and the support services they provide for human trafficking survivors.



A Non-Governmental Organisation (NGO) is a non-profit organisation that performs a variety of services and humanitarian functions.

Activity 8.1 Exploring partnerships

Identify the partnerships that your organisation is currently involved in and research others that you could suggest would be good to align with:

Partnership Types	Current Partnerships	Ideas for Future Partnerships
Global		
Sector		
Local community		



Add your answers to Activity 8.1

8.5 NGOs in operation

The European Red Cross

European National Red Cross Societies provide support and relief to those affected, or in danger of being affected, by human trafficking. Their activities focus on prevention, assistance to victims and referral. Preventative campaigns and programmes focus on raising awareness among the public and tackling any prejudice and intolerance that victims might experience. Some European Red Cross Societies run safe houses and shelters for victims of human trafficking and propose counselling, legal advice, psychosocial support and group therapy.



The European Red Cross Anti-Trafficking Network is an informal collaboration between European Red Cross or Red Crescent

societies. Its purpose is to share experiences and best practices on the prevention of trafficking and victim assistance.

Visit European Red Cross webpage on THB at:

www.redcross.eu/en/What-we-do/Asylum-Migration/Red-Cross-Networks-on-migration/European-Anti-Trafficking-Network/



Visit European Red Cross webpage on THB

Anti-Slavery International

Anti-Slavery International, the oldest human rights foundation, was established in 1839. It works to eradicate all forms of slavery, including human trafficking by enabling people to leave slavery. Anti-Slavery has consultative status with the UN Economic and Social Council, participatory status with the Council of Europe and we are a member of the International Labour Organization Special List of NGOs.

It provides psychological and legal support to victims of slavery and identifies ways in which abuses can be brought to an end. Anti-Slavery International also offers independent advice on due diligence and supply chain transparency for a wide range of industries. They are delivering training programmes for organisations to understand and comply with legal requirements and manage reputational risks.

Visit Anti-Slavery website at: www.antislavery.org/english/?pr



Visit Anti-Slavery website

ECPAT

ECPAT International is a global network of organisations working to eliminate child prostitution, child pornography, child trafficking for sexual exploitation purposes and child sex tourism. It seeks to ensure that children everywhere enjoy their fundamental rights, free and secure from all forms of commercial sexual exploitation. ECPAT estimates that 1.8 million children are exploited in prostitution or pornography worldwide and that 20% of all victims of sexual exploitation are children.

Visit ECPAT UK website at: www.ecpat.org.uk



Visit ECPAT UK website

Payoke

Payoke is a NGO founded in Belgium in 1987. It fights against human trafficking by providing care, support, and protection for trafficking survivors. Payoke offers survivors legal support, residential care, administrative support, information and education, psychosocial support and ambulant care. The latter is offered to survivors who have escaped their traffickers and are living on their own until they no longer need assistance.

Visit Payoke website at: www.payoke.be



Visit Payoke
website

8.6 Summary

This unit:

- explained the importance of developing effective anti-THB partnerships and networks,
- provided examples of partnerships at the global, sectorial and local levels.



Unit 9: 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'.

9.1 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 pressurised by the precarious situation at home: the person may want to carry on working to send money home regardless of their own 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.

9.2 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).

9.3 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 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, point out the need for an interpreter 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 the 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.

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.



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.

9.4 Summary

In this unit we have:

- recommended an intervention protocol and policies that must be in place for 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.



Unit 10: Liaising with Law Enforcement

In this Unit we:

- discuss about how hotel management should liaise with law enforcement,
- recommend practices to be followed in the case of an incident of suspected THB.

10.1 Police industry liaison

Historically, the relationship between law enforcement and the hospitality sector has been very effective and collaborative. The collaboration between the two on crime, fraud and terrorism has been exemplary over the past 2-3 decades. In many countries, assigning police officers to work with local industries in crime prevention has become a widespread practice. These liaison officers enable better communication between police, hotel security and other hotel business entities. The relationship facilitates a collaborative, community-oriented approach on harm-reduction that enhances police and industry cooperation in the protection of people and property.

Respect and trust will come along with information sharing, cooperation, and consistency that is beneficial to both parties. By encouraging public-private teamwork in crime prevention and investigation of a crime case, we help eliminate the possible credibility gap between police and private businesses.

In many hotels, personnel are encouraged to work closely with law-enforcement to prevent crimes from happening, and whenever there is a major incident. A considerable part of liaising involves sharing information about risks and threats. Major liaison activities can be joint meetings, trainings and helping in investigation process. Networking in this way is useful in order to become familiar with officers who work in the vicinity. They may share valuable information with you about how to approach ethnic and other groups in crime prevention and counter-terrorism activities.

Police are usually responsible for organizing meetings but the hotel industry can invite assigned police officers as experts to join training days and participate in the planning of anti-THB workshops and exercises.

Visit London Hotelwatch website at: www.londonhotelwatch.org.uk

10.2 Providing the right information

It is important that in the case of any incident that involvement of law enforcement is required, the right and accurate information must be always available. There are certain practices that are advisable in case of an 'incident' (any criminal incident including suspected THB):

1. **Document the incident.** You can take photos of the guest's room and site of incident. An investigation and prosecution will rely on documents that are instrumental to the crime being available to a court in their original form. Also the hotel would need the documentation for its internal auditing and investigation.
2. **Keep an "incident log"** for any suspicious guest or employee behaviour. The log can be valuable for working with the police and staff. It can be critical to maintain a log of THB-related incidents and behaviour, especially if your hotel is asked to engage with the criminal or civil justice systems. Records must be kept of any other significant facts and events, for example, relevant conversations, how suspicions were aroused, chronological sequences of events, names of potential other victims, and so on. Recording the



Visit London Hotelwatch website and find out how it provides up to date and important information regarding security and communications directly to member hotels via this website and alert systems



Maintaining information that can help law enforcement build a THB case and preserving evidence in the 'crime scene' is the most important role of the hotel manager.

information will help management recollection of individual incidents about which they might later asked to report on or testify.

3. Save all **documentation, CCTV films, photocopies of all I.D, and files.** It is important to ensure that the integrity of any evidence of a suspected THB case is preserved at an early stage. The location where an illegal act may have taken place or a location wherein evidence of a crime may be located must be treated with the utmost care so as to not contaminate or destroy evidence.
4. Try not to use the **telephone** at the scene (in the hotel room) before the police have secured phone data as evidence. As with documents, steps should be taken by a competent person to preserve evidence from computer that is possibly used in the trafficking case. If a computer is connected to a server, it is also important to preserve a log of net server traffic.
5. **See something - say something.** Never hesitate to call the police if you are suspicious about someone or something. Ask for a patrol car to come by, so you can speak with an officer about it. Prepare to tell the police your name, address, date of birth and a telephone number where you can be reached. You may request to remain anonymous and any information that you provide will be kept in confidence. An officer will take the necessary information from you and proceed with an investigation. The police will ask you what happened, where it happened, when it happened and if anyone was injured. Bear in mind that in a crime scene, the priority will be the preservation of life by ensuring appropriate medical attention and evacuation of non-involved persons.
6. **Avoid any physical confrontation** with suspected traffickers.
7. **Communicate the incident / suspects with senior management but avoid spreading information to all staff.** Make sure that employees who are aware and involved understand all necessary procedures, especially when it comes to media or other potential stakeholders.
8. **Know your rights** when liaising with law-enforcement. If you are unsure about whether you have to cooperate with the police, or if you are unsure how much information you are legally required to give the police, you can consult with a lawyer or lawyer of your hotel association. A lawyer can also provide advice on what hotel management should divulge to investigators (if anything), and what information should remain confidential.

10.3 Summary

Hotel management should forge a strong and collaborative relationship with law enforcement.

- normally a police liaison officer will be assigned for a hotel or cluster of hotels and will work with the general manager and the hotel security personnel,
- there are some generic guidelines that need to be followed when liaising with law enforcement in any criminal case such as THB.



Remember to follow your organisation's media communication policy, normally suggesting one spokesperson and not allowing employees to give unauthorised interviews



Unit 11: Human Trafficking in Third Parties

In this Unit we are going to look at the THB risk exposure of a hotel through third parties, namely suppliers, recruitment agencies, outsourcing agencies and construction companies. We will:

- identify potential red flags and signals for THB victims in these third parties, and
- explore ways by which we can erect barriers to trafficking in them.

11.1 Vulnerability of third party involvement

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 who employ migrant workers without appropriate due diligence; buying products produced by forced or bonded labour; tolerating labour exploitation or violation of labour rights in companies that build and maintain their facilities; or by simply 'not noticing' anything.

Typically, a recruiter charges the worker a recruitment fee, travel costs and visa fees. They or the employer confiscates the worker's travel documents. Then workers are forced to pay high rents for a filthy accommodation and to reimburse the recruiter for all of the fees.

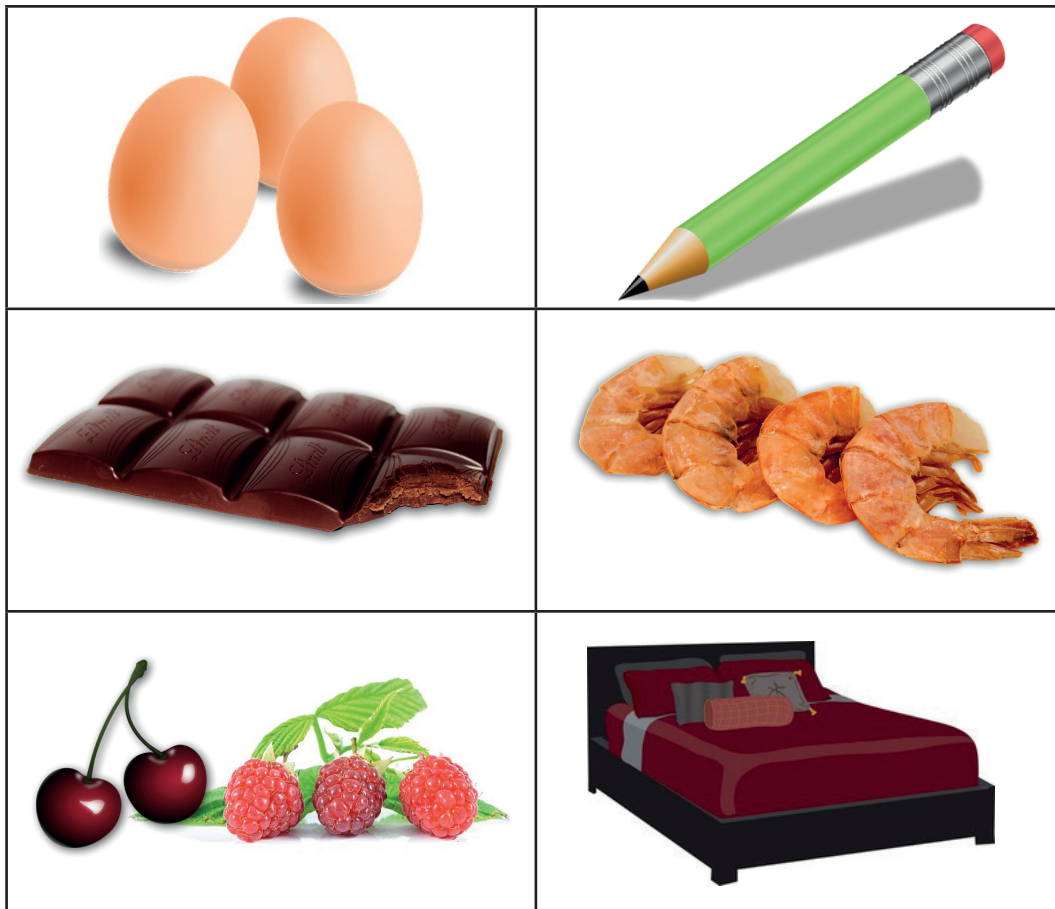
Therefore, it makes common sense to detect signals or red flags that can identify the existence of human trafficking in these third parties.

11.2 Supply chains

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 11.1

What products supplied to hotels could have been produced with trafficked labour?³³ Select from the items below as to which you think could have been produced in this way.



Add your answers to Activity 11.1

11.3 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.

11.4 Construction companies

An often ignored third party, as far as human rights, trafficking and exploitation are concerned, is the construction sector. Many construction companies that build, renovate and refurbish or maintain hotel properties systematically exploit millions of vulnerable migrants. Bonded labour, delayed wages, lamentable working and living conditions, withholding of passports and limitations of movement are some of the many questionable employment as well as procurement practices in the sector.

They often employ themselves recruitment agencies without vetting them and without knowing how they recruit, treat and compensate the workers they bring in.

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

11.5 Worker's behaviour: the first red flag

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,
- 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.

Activity 11.2

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.



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



Write your answers to Activity 11.2

11.6 Other red flags: legal documents, payment, dependence on others

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 that they:

- have few or no personal possessions,
- are not in control of their own money, no financial records, or bank account,
- have wages taken off them for accommodation, food or to repay supposed debt,
- are not in control of their own identification documents (I.D. or passport),
- will often be forced to use false or forged identity documents.

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. Indicators of such a dependence are that the victims:

- are not allowed or able to speak for themselves (a third party may insist on being present and/or translating),
- are inconsistent in the information they provide, including basic facts such as the address where they live,
- appear under the control/influence of others and rarely interact with colleagues, and
- appear unfamiliar with their neighbourhood or where they work.

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 over time.

11.7 Addressing the third party THB risk

The first step in addressing third party THB risk is to make a clear commitment expressed through an anti-THB strategy and programme which will be part of a wider organisational **Code of Conduct**.

- communicating to all third parties your **Code of Conduct** and committing that you will only do business with those that are completely aligned with it.

Visit the verite website at: www.verite.org/node/652



To see sample provisions offered by Verite that can be used by your hotel as you are considering how best to create, strengthen or revise their own supply chain policies.

Benchmarks based on your anti-THB programme that indicate good practice can help evaluate any third party's labour and human rights performance. These benchmarks can cover a number of areas that will typically include:

- forced or involuntary labour,
- recruitment fees,
- contracts of employment,
- deposits,
- humane treatment,
- workplace equality,
- wages and benefits,
- working hours,
- freedom of movement and personal freedom,
- grievance procedures,
- private employment agencies and labour recruiters.

Visit the Verite website at: www.verite.org/node/653

The next step concerns the supply chain and is about **mapping out relationships** between agencies and suppliers. You may of course make sure that you start with the biggest areas of risk and then focus on a geographical area, or a certain third party (supplier, outsourcing agency, constructor).

For high risk and new third parties involved in the hotel's operation conduct **Audits** and **On-Site Assessments**. There you can scrutinise each party accordingly.

For suppliers and construction companies:

Conduct random interviews with workers from different nationalities using independent researchers. The interviews should be carried out in confidence, away from the site and without any external influences.

For outsourcing agencies:

Undertake some deeper research in order to assess quotations and fees from agencies that offer or are charging suspiciously low rates. Apart from the site audit, another team with background checks and identify whether workers are paying recruitment fees.

Normally, it is migrant workers that are exploited. The Institute of Human Rights in Business has presented a set of principles to be followed when employing migrant workers which are called the **Dhaka Principles for Migration with Dignity (Fig. 11.1)**. These can become a good reference point when planning third party audits in relation to workers but also for your organisation's self-assessment when it comes to employment practices. These principles are based on international human rights and labour standards - notably relevant ILO conventions and the UN Guiding Principles on Business and Human Rights.



to see a set of sample benchmarks below is consistent with the code provisions outlined above.

Fig. 11.1 The Dhaka Principles for migration with dignity



Source: Institute of Human Rights in Business

For non-complying third parties, before terminating the collaboration, develop a Corrective Action Plan (CAP) and engage with the third party in order to remediate any gaps and to monitor the remediation process with reasonable deadlines for completion.

11.8 Summary

In this unit we:

- identified signs or key red flags in third parties 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 human trafficking in your organisation and its extended supply.



Unit 11 answers



Activity 11.1

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 11.2

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?

Conclusion

Trafficking in human beings (THB) is a serious risk for a business 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 impact on hospitality businesses. We are hopeful that this training has served its purpose of driving the development of operational policies in your business for combating human trafficking. The responsibility very much comes from the top; regional and senior managers need to exhibit a dedicated commitment to carefully implementing an anti-THB programme. The hotel 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 business 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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