

Industry Agenda

Hedging Risk by Combating Human Trafficking: Insights from the Private Sector

Prepared by the Network of Global Agenda Councils task force on human trafficking

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Introduction



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According to the International Labour Organization, more than 20 million women, men and children around the world are currently the victims of human trafficking.

Tricked, desperate or simply coerced, they provide cheap labour for a wide range of sectors, from domestic work and agriculture to construction and manufacturing, or are the unwilling victims of sexual exploitation.

Small wonder, then, that the UN describes human trafficking as “a crime that shames us all”.

Yet it is also a crime that all of us, especially in business, are in a position to combat.

Why should business care about trafficking?

Even if we confine ourselves to concerns about the bottom line and responsibilities towards shareholders, there is a clear business case to be made for the private sector’s role in tackling trafficking.

For a start, all forms of illicit trade cost the legitimate private sector money – and trafficking is big business. The International Labour Organization estimates that forced labour in the global private economy generates \$150 billion in illegal profits every year.

Furthermore, an unregulated workforce, and its recruiters and employers, make no contribution to taxes, healthcare systems or any of the services that help societies to flourish, leaving legitimate businesses to carry a larger share of the burden.

There is also the very real threat of reputational damage. These days, it is not enough for leaders to say they weren’t aware of the corrupt nature of a part of their supply chain; this will count for nothing in the face of outrage from consumers whose choices are increasingly informed by ethical considerations.

But there is, of course, a clear moral imperative for all companies to ensure that their business is free of modern slavery.

The human cost of trafficking is incalculable, as Yury Fedotov, Executive Director of the United Nations Office on Drugs and Crime, emphasized at the launch last July of the first World Day Against Trafficking in Persons.

Trafficking, he said, “exploits the dream of millions for a better life for themselves and their children”. Traffickers “steal this hope to turn people into commodities in a perfidious trade that, despite our efforts, continues to operate with impunity”.

In the early years of the 21st century, at a time when humankind has never been so interconnected and so interdependent, the cruel trafficking of people for criminal gain is surely a stain on our civilization that none of us, corporation or individual, can allow to stand.

I commend the Global Agenda task force on human trafficking for starting a conversation with the World Economic Forum to ensure that it will not.



Daniel Beaulieu
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Human trafficking is bad for business.

That, certainly, is the conclusion of the co-authors of this report, Louise Shelley, Director of the Terrorism, Transnational Crime and Corruption Center at George Mason University, and Christina Bain, Director of the Initiative on Human Trafficking and Modern Slavery at Babson College, both members of the World Economic Forum's Global Agenda Council on Illicit Trade & Organized Crime.

The Network of Global Agenda Councils is a unique, global community of over 1,500 premier thought leaders who are the foremost experts in their fields of academia, business, government, international organizations and society. Grouped into over 80 councils, Global Agenda Council members commit their extensive knowledge, expertise and passion to jointly shape the global, regional and industry agendas. The Global Agenda Councils are committed to addressing the most pressing issues and opportunities of our time and aim to provide new thinking and solutions.

As members of the Global Agenda Council on Illicit Trade & Organized Crime, this task force believes that trafficking is a subject that cuts across the work of several different councils and conceived the idea of a powerful working group whose members would be drawn from across the network. They recruited members from 15 Global Agenda Councils, representing subject matters as diverse as migration, human rights, logistics, population growth, oceans, poverty and travel and tourism, and each had valuable insights to share.

The task force has two purposes, the first of which is fulfilled by this report. By drawing on the anti-trafficking experiences of the members from a range of councils, it offers a practical toolkit for medium-sized companies, many of which might lack the resources and confidence to tackle trafficking on their own.

The second purpose is that the task force will evolve and grow to serve as a "safe space" within which the trafficking conversation may continue and expand across the Forum community.

We look forward to continuing the work they have started.

Human trafficking in the private sector: an ongoing challenge

Human trafficking in a globalized economy

In an increasingly connected world, human trafficking remains a persistent struggle. Almost 21 million people worldwide are victims of forced labour, and are unable to escape.¹ It is estimated that 68% of these people are victims of labour exploitation, while 22% are victims of sexual exploitation.²

As the demand for goods and services has increased, so too has the demand for people: the US State Department estimates that 600,000-800,000 people are trafficked across international borders each year.³

Evidence suggests this number will grow as criminal organizations shift from trade in arms and drugs to humans, due to higher profits and lower risk of punishment.⁴ According to estimates from the International Labour Organization, in 2012, trafficking was a \$150 billion global industry, with over two-thirds of the profits coming from commercial sexual exploitation.⁵

Quick stats

20.9 million people around the world are victims of forced labour

Three out of every 1,000 people are in a situation of forced labour at any given point in time

In 2012, victims of human trafficking came from **136 different countries**

55% of those trafficked are women and girls

Source: *Global estimate of forced labour: Executive summary*, International Labour Organization, 2012

“In 2011, 40% of detected trafficking victims were victims of forced labour.”

Global Report on Trafficking in Persons, United National Office on Drugs and Crime, 2014

Forced labour and sexual exploitation

Human trafficking is often associated with the forced sexual exploitation of women and girls. Yet it also encompasses forced labour, and is prevalent in sectors such as shrimp farming, harvesting and processing, construction, agriculture and manufacturing.^{6,7,8} For example, the NGO Verité recently found that 28% of workers in the electronics sector in Malaysia were victims of exploitative practices. These include recruitment fees that exceed wages, deception concerning wages, hours, overtime requirements or pay, and the unlawful retention of passports.⁹

For this publication, we have conducted research on both sex and labour trafficking. However, it was easier to find information on efforts to combat sexual exploitation, as this is the main area of focus of most companies' anti-human trafficking initiatives. We interviewed corporate officials, employees of companies and NGOs that work with the corporate world.

The role and cost of human trafficking for the private sector

Contrary to popular belief, trafficking does not only happen through obscure or shell organizations. Traffickers use all types of private sector companies to ply their trade. They make use of the lowered costs of transportation, online recruitment websites, hotels and other hospitality venues, as well as the ability to wire payments globally through private financial institutions. Companies may use resources to cover the cost of litigation if accused of a crime, as well as to cover other costs related to brand and reputation management.¹⁰

How the private sector benefits from addressing human trafficking

While human trafficking has often been relegated to a company's downstream activity – dealing with litigation or reputational management, for example – anti-trafficking experts are increasingly emphasizing the need to use preventative strategies that ensure staff members are trained and well-informed when it comes to dealing with human trafficking. These strategies also focus on getting the buy-in of top management to ensure a company-wide culture of dialogue and participation in identifying and preventing the crime at every level. Failure to address human trafficking can result in strong responses from consumers, who are increasingly demanding improvement in the sourcing of commodities and the working conditions of employees.

A thorough review of internal policies to address anti-human trafficking efforts ensures that companies can better mitigate risk in the long term, which can lower costs and make it easier to prevent human trafficking.

Mitigating the risk of forced labour or sexual exploitation is all the more important in an interconnected world. Today's risks not only possess a globally geographic scope and high levels of economic and social impact, but also carry tremendous cross-industry relevance.¹¹

Efforts in the transportation sector to prevent trafficking may yield insights for the hospitality industry, for example. Such knowledge transfer is integral to building trust among companies that may be reluctant to acknowledge human trafficking in their supply chain. It also ensures that best practices are being shared as widely as possible, helping create a culture of transparency and continued dialogue.

Human trafficking

“A process by which people are recruited in their community and exploited by traffickers using deception and/or some form of coercion to lure and control them.”

Global Report on Trafficking in Persons, United Nations Office on Drugs and Crime, 2012

A roadmap for the way forward

The private sector has an important role to play in combating this global crime. It can train employees and raise awareness among them. It can encourage a cultural shift about the issue in the organization. And it can design interventions to address the problem internally.

This publication is intended to function as a toolkit for companies interested in adopting practices that will limit sexual and labour trafficking. It provides an overview of current trends, initiatives and partnerships in the private sector. In doing so, it focuses on how technology is helping raise awareness and target traffickers, the critical role that corporate leadership plays, and the importance of employee-led initiatives. This is an evolving work and a start to this discussion based on submissions and interviews given by task force members and other anti-trafficking leaders. In the future, the hope is to add more promising practices from other sectors and stakeholders.

Figure 1: Forced labour is both human trafficking and modern slavery



Source: Business for Social Responsibility

Innovation in the financial services and technology sectors to combat trafficking

Using financial services to track transactions

More and more, financial services are able to use new technologies to trace the transactions of potential traffickers. Since they are at the forefront of customer interaction, financial institutions can leverage their data to detect accounts with questionable activity. “All sorts of electronic and digital fingerprints are left when a crime is committed or a business enterprise is being run,” says Manhattan District Attorney Cyrus Vance. “Financial institutions are in a unique position to spot red flags in banking activity and report them to law enforcement.”¹²

In 2010, JP Morgan did exactly that. Barry Koch, formerly a managing director at the bank and now the chief compliance officer of Western Union, recalls that JP Morgan’s Financial Intelligence Unit first approached human trafficking through a data-driven lens. “With public domain information and law enforcement partnerships, we realized that we could design financial models that would produce correlations in the data that were red flags for trafficking.”¹³

The team partnered with the Department of Homeland Security to create typologies that could identify financial transactions and certain account attributes that were worth investigating. Certain geographic locations and types of businesses – nail salons, non-unionized stores, restaurants – were viewed as a higher risk for trafficking activity based on publicly sourced information.¹⁴ Coupled with types of transactions – credit card charges at certain hours of the night, for example – JP Morgan’s Financial Intelligence Unit began to see distinct patterns emerging.

“For instance, we found \$100 manicures between 23.00 and 04.00 in Manhattan,” he says. “Nobody is getting a manicure that late, and whoever is getting a manicure is not paying that amount of money for it.”¹⁵ Viewed separately, none of the variables seemed remarkable. Yet viewed in aggregate, they created an anomaly or pattern worth investigating.

This distinction is important to note. Drug trafficking and organized crime can trigger suspicion because large amounts of money flow through a single account. Such activities trigger red flags and a suspicious activity report is sent to the US Financial Crimes Enforcement Network (FinCEN) on behalf of a financial institution.

Transactions that could indicate human trafficking is taking place

A. Payroll activity in business accounts

- Non-payment of taxes, workman’s compensation and other fees to a tax authority
- Rate of pay for each pay period is identical (no changes for overtime, vacation, sick leave, bonus payments, etc.) in jobs where that would not be expected
- Recurring payments for wages at unreasonably low amounts (such as \$1.19 for the entire pay period)

B. Business expenditures

- Relatively high expenditures for items inconsistent with stated business purpose
- Transactions that occur outside the time of known business operations

C. Cross-border

- Unexplained patterns of cross-border transactions between known trafficking routes, or areas where there is a higher risk of trafficking
- International transactions in or with geographies where there is a higher risk of trafficking or sexual tourism

D. Personal expenditures and deposits

- Repeated low-value payments to online or print advertisers known to cater to the sex industry

Yet while FinCEN maintains that certain red flags can signal possible human trafficking activity, the JP Morgan case suggests multiple variables need to be examined to establish a stronger indication of the crime.¹⁶ Rather than merely filing a suspicious activity report, financial institutions might more effectively pinpoint human trafficking activities if they examine several variables, including recurrent business transactions outside the time of known business operations, cross-border transfers of funds inconsistent with the stated business purpose of the account holder, as well as a high number of individual accounts opened and closed simultaneously.¹⁷

MetaBank, a bank based in Iowa, has also built rules and typologies to capture specific patterns and behaviours. In a partnership with NICE Actimize, a financial crime prevention company, the bank's Financial Intelligence Unit & Analytics department is developing a typology of financial activities linked to suspected cases of human trafficking, especially the use of pre-paid cards.¹⁸ Brian Pulling, the vice-president of MetaBank's Financial Intelligence Unit & Analytics department, notes: "We talked to law enforcement, we looked at websites where we knew human trafficking was being done, and we started looking at some of the typologies that were inherent to the purchases on cards."¹⁹

He adds that to identify potential cases, it is important to create strong links with law enforcement. "It's an open exchange of information that has allowed detection."

Technology can enable or disrupt human trafficking

Technology has the potential to enable or disrupt human trafficking. In one respect, the free flow of information through the web and mobile has created new opportunities for traffickers to exploit victims.²⁰ Women and girls especially are often lured through online advertisements for models, mail-order brides, nannies, waitresses and domestic servants.²¹ Customers are now more easily able to solicit victims at the click of a button.

Conversely, the increased availability of online toolkits, publications and publicly available information has allowed anti-human trafficking advocates to better access and share information. For example, the International Organization for Migration works with Interpol to maintain the Counter-Trafficking Module database, which collects information on both victims and trafficking groups; the US Department of Transportation maintains an online collaborative workspace where people can exchange ideas and best practices, and share training programmes and materials.²²

In addition, the proliferation of publicly available information has allowed advocacy groups to share information with companies seeking to engage on the issue. Louise Shelley, the director of the Terrorism, Transnational Crime and Corruption Center at George Mason University, notes: "Eight years ago there was no material on the web for a corporation that wanted to ensure it did not engage in sex or labour trafficking. Presently, there is extensive

material online that discusses issues such as trafficking in supply chains and the abuse of workers in the recruitment process."²³

Private sector efforts to disrupt trafficking using technology

Private sector companies have also taken an increased interest in combating human trafficking through the use of technology. In 2012, Microsoft awarded \$185,000 in research grants to better understand how technology is used in sexual trafficking and develop new interventions.²⁴ That same year, they brought together the researchers they funded at an annual conference, to promote networking and improve research in the area. The company has made clear that it sees technological disruption as an important aspect of combating human trafficking: by raising the cost, risk and difficulty of doing business, trafficking becomes a less lucrative and appealing trade.²⁵

Other actors that have invested in disruptive and innovative platforms include Google, which donates part of its philanthropic efforts to initiatives such as the Slavery Footprint Calculator and the Polaris Project, which operates a national trafficking hotline.²⁶ Palantir Technologies, a computer software and services company, has worked with the United States National Center for Missing and Exploited Children to search for and analyse information relating to missing and exploited children and sex offenders.

Semantic Research, a software company, has developed software that helps integrate data about suspected traffickers across many categories of information. This allows law enforcement to connect the dots in ways that in the past were not possible. The ability to map complex financial and personal data to enhance law enforcement investigations provides tools that were not previously available and allows mapping of international networks.



What's next? Combining data with qualitative insight

While the proliferation of online resources and data analysis tools can stop traffickers and disrupt transactions, JP Morgan and Metabank's cases illustrate a need to combine the profusion of quantitative information with qualitative analysis. Both banks combine metadata analysis with investigative insights. Unlike large-scale data analyses that assume data mining alone will reveal patterns of human trafficking, this public-private approach allows actual investigations and patterns in human trafficking to be incorporated into the software that searches for the indicators.

Last year, JP Morgan, Citigroup, Bank of America, Wells Fargo, TD Bank, Barclays, Western Union and American Express formed the Bankers' Alliance against Trafficking, in cooperation with the Manhattan District Attorney's Office and the Thomson Reuters Foundation. The alliance is meant to foster greater collaboration to fight human trafficking more effectively. "Human trafficking is not a problem that law enforcement alone can tackle. It requires close collaboration with many concerned groups looking at this crime through different lenses," District Attorney Vance says. By examining financial data, the financial sector has increasingly been able to help law enforcement secure convictions against traffickers without having to involve traumatized victims.²⁷

"Human trafficking, at its core, is a business. Like other businesses, it leaves a financial paper trail that can be tracked."

Cyrus Vance, Manhattan District Attorney



The transport industry: airlines and trucks to fight traffickers

Knowing the different transport methods – such as airline carriers – that traffickers are increasingly using to ply their trade, in 2000, 117 countries signed three protocols, known as the Palermo Protocols. Under one of the protocols, the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children, state parties agreed to adopt measures to prevent the use of commercial carriers in transporting trafficking victims.

So far there have been few private-sector-led initiatives to comply with these protocols, and the bulk of the work has fallen on law enforcement and government officials. The following case study shows how NGOs and airline carriers can collaborate to train airline staff, who are the first line of defense in protecting the countless victims who are trafficked on major flights each day.

Innocents at Risk and the airline industry

Deborah Sigmund founded the non-profit Innocents at Risk in 2005, after first hearing the phrase “human trafficking” on vacation in Europe.²⁸ Determined to learn as much as she could about this horrific industry, she met with other advocacy groups such as Save the Children and Vital Voices.

In 2007, the NGO began training airline personnel by issuing brochures and wristbands, and carrying out workshops on how to spot and report suspected cases of human trafficking. The training has equipped thousands of flight attendants with information on how to recognize and report trafficking before the plane even touches down.

Then, in 2008, Sigmund met Sandra Fiorini, a flight attendant who had been in the business for over 39 years. Fiorini had become attuned to spotting cases of human trafficking, although the police had never responded to any of her reports. “When you see an instance that’s not right and a red flag is raised, especially when there are children involved, you’re more in tune with what’s happening,” she says.²⁹

She recalls one incident where an 18-year-old man was on one of her international flights with a newborn infant. “The umbilical cord and everything was still there; it was a day-old baby,” she recalls. “He’s going on a six-hour flight, no wife. He has two diapers stuck in his pockets and one bottle.”³⁰

Sigmund and Fiorini quickly teamed up, and in 2008, Innocents at Risk launched its Flight Attendant Initiative.



Through the initiative, around one-third of American Airlines’ 19,000 flight attendants have received a copy of *Protecting Women and Children from Human Trafficking*. The brochure alerts flight attendants to the signs of trafficking and gives them a national hotline (1-888-373-7888) to report critical information, and possibly save a life. As a result, thousands of flight attendants have become involved with the Flight Attendant Initiative.

Flight attendants also train each other at airline hubs on the type of suspicious behaviour to look out for on a flight. The warning signs, which have already been identified, are presented in the training. This is a bottom-up initiative among travel employees who have used their expertise to help save lives. It is an example of employees in a key industry taking the lead in combating trafficking.

The initiative has also partnered with law enforcement to have a broader impact. In the United States, it is assisted by the Department of Homeland Security, the State Department and Customs and Border Protection.

By working with government agencies, flight attendants are able to alert law enforcement when they suspect a child on their flight is a victim of trafficking. On several occasions, after an alert was raised, law enforcement have been waiting for a plane when it has landed. This teamwork between airline personnel and the government has led to several very successful investigations that have broken up child trafficking networks.

This is the perfect example of corporate, NGO and government collaboration to combat human trafficking. By partnering with airline ambassadors, Innocents at Risk is working to expand its outreach to all major carriers.³¹



Truckers against Trafficking: keeping American roads safe

Gaining traction through truck shows

Truckers against Trafficking (TAT) began in 2009 as a grassroots initiative to inform and educate the trucking network to prevent human trafficking on US highways.

Kendis Paris, the executive director of TAT, says that it was important for the organization, which became a 501c3 organization in 2011, to mobilize the private industry, because this would have a larger impact than only collaborating with law enforcement. “There are 3 million commercial driver’s licenses on the road,” she says. “These trucks outnumber the police force in any given state at any given time.”³² With over 300,000 trucking companies in the US and nearly 7 million employed in trucking-related jobs, there is tremendous preventative potential within this tight-knit industry.

Educating the community began at the grassroots, and quickly expanded to a larger network once the group began attending truck shows. While truckers themselves are at the frontline of human trafficking – both as potential carriers or preventers – the “big rig” shows are where the industry’s professionals meet to discuss the latest news and information. “Not only are truckers and CEOs walking around these shows, but it’s the big trucking associations, too,” says Paris. “If we can bring all our materials to them and deliver a keynote, that has tremendous impact.”³³

One example of success was when, after speaking about the issue at a conference, Paris managed to get Ryder, the sixth largest trucking company in the US, to partner with the organization. “The vice-president of supply management for Ryder happened to be in the audience. He said he took it personally that these traffickers were exploiting the trucking industry for their personal gain. He took it back to his corporate executives, and now Ryder is our gold standard partner in terms of training and awareness.”³⁴ In partnership with TAT, Ryder has trained 24,000 employees to recognize signs of human trafficking. The company has also pulled in Bridgestone Tires on a three-year pledge to fight human trafficking. This year, Bridgestone donated \$25,000 to

TAT encourages the use of the Iowa Department of Transportation model to spread awareness at the state level:

- Train motor vehicle enforcement officers or law enforcement officers with TAT materials.
- Stock weigh stations and rest areas with TAT materials.
- Visit truck stops with TAT materials, urging them to distribute it and to train employees.
- Implement TAT training as part of mandatory safety compliance meetings in trucking companies.
- Spread awareness about TAT via multiple channels: website, Truck Information Guide, state fair, road check, etc.
- Use influence to spread the word about TAT to trucking (and other) agencies (i.e. DIAP, CVSA, AAMVA, motor coach)

combat the crime and is also training their national sales team about the issue.³⁵

While Paris says that having a champion in top management is key, she notes that the trucking industry is like any other: it’s about who you know. “Each association knows another one, and will bring on another partner.”³⁶

Building local coalitions

To increase awareness and have a bigger impact, TAT carries out one-day trainings to build coalitions among law enforcement, NGOs and trucking companies. By partnering with managers of trucking companies, local advocacy groups, and state, local and federal authorities, TAT provides extensive training to staff and drivers, and also urges managers to use their local truck stops to help spread the word to other truckers and the traveling public.

“Mobilizing local response is critical,” says Paris. “We have a survivor come and share her story, because there’s sometimes a mentality of ‘I just want [trafficking] off my lot’, not ‘I want to assist this person’.”³⁷ There is also the added benefit of looping in various sectors of law enforcement, which need additional information in order to be effective. “The specialists from the National Human Trafficking Resource Center and federal officers often have the most information, but then you also need to inform the local guys who are going to go to that truck stop at 1 am.”³⁸ This is important for smaller towns such as Menomonee Falls, Wisconsin, she adds, where it is possible to build capacity where there was none before.

The coalition model helps prevent human trafficking in a variety of ways. It connects local industries and law enforcement, and provides a space for honest dialogue to close loopholes and gaps. “At one of the meetings, a general manager realized that an underage brothel was running across the street from his back lot,” says Paris. “At first he thought it was a salon. He didn’t connect the dots until he sat down and began going through all the questions we asked. You never know what’s going to come out of the dialogue and that is where this sudden flash change can happen.”³⁹

Figure 2: A TAT Freedom Driver trailer



The coalition also increases communication among its members. For example, when there is a suspicious vehicle at a truck stop lot, general managers can send out a notice to other lots by email, telling them to be on the lookout. They can not only make a phone call to the hotline and the local police, but they can also send out a notice to other lots by email, telling them to be on the lookout. Law enforcement can also get specific alerts out to members of the coalition more quickly and efficiently.

To successfully implement any anti-human trafficking model, Paris says it’s critical to support the private sector rather than criticize it. “It is so essential to partner with industry. We don’t ever want to take the approach of trying to shame anyone. It’s about working with corporate America and having a conversation in the open.”⁴⁰

Freedom Drivers and promoting a positive image

One way in which TAT is working to promote awareness in its work with the trucking industry is through its Freedom Drivers project. The team took a 48-foot-long trailer and turned it into a mobile showroom that displays artifacts from various trafficking cases. One artifact is a pill bottle from a woman who at 12, was sold by her mother to bikers and forced into prostitution and stripping. She has had multiple back surgeries and as a result depends on pain killers. “The point of the trailer is to help people understand why TAT’s work is so important, and how people can become further involved,” says Paris.⁴¹

The trailer is meant to be more than a form of public relations – it is also meant to show the trucking industry that TAT is working with them, not against them. “For many companies, image matters and so does the bottom line. When we are promoting our programmes within industry, we have to get where private firms are coming from. Our best practice is to listen. If we can exert positive pressure, we will. We run with those who are ready to run.”⁴²

Figure 3: Inside a TAT Freedom Driver trailer



Hospitality and tourism: creating a culture of dialogue and awareness

Opening a dialogue

As one of the world's largest industries – 9.5% of global GDP and 266 million jobs – travel and tourism has a tremendous ability to influence the global dialogue on human trafficking.⁴³

Today, a number of companies engage in policy-driven corporate initiatives and philanthropic activities that address both the downstream and upstream side of trafficking. They do so by creating greater awareness and training in order to prevent it, as well as supporting organizations that help its victims.

Primary actors in this space include Carlson, Marriott International and Hilton Worldwide, as well as several lodge associations and advocacy groups. This chapter tells the story of how some of the largest hotel companies in the world have triggered policy change in the industry, and outlines lessons learned by those implementing change today.

The Code: how one signature spawned an industry movement

When the former chairwoman and chief executive officer of Carlson Companies, Marilyn Carlson Nelson, took a stand against child trafficking in 2004, she broke what she called a “conspiracy of silence” in the industry.⁴⁴ She notes: “As a family-owned business, once we learned of the millions of children who are used for sexual purposes in the travel and tourism industry worldwide, we could not turn away.”⁴⁵

Under Nelson's direction, Carlson Companies signed “the Code” – a voluntary set of guidelines to prevent child sex tourism and trafficking. Officially known as the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism, companies that sign it commit to six steps to ensure they create a long-term, sustainable plan for fighting the trafficking of minors. “It's not just a training or awareness campaign that lasts for a few months,” says Michelle Guelbart, the director of private sector engagement at End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes (ECPAT) USA. “It's a long-term process where each company works with a local code representative to implement it.”⁴⁶

As a global initiative, regional organizations work in countries to help implement the Code and report on company

Figure 4: Current signatories to the ECPAT Code



Source: thecode.org

progress, creating an accountability mechanism that makes it possible to measure progress. Further incentives to induce commitment include the option for a company to publish their report online, which increases their visibility on ECPAT's website and gets them greater brand endorsement.

Nelson's bold decision, supported by Hilton Worldwide's commitment to the Code in 2011, has triggered what Guelbart calls “a multiplier effect”. Over 1,200 companies – including Colombia, China, Egypt, Thailand, Australia, Brazil and Russia – have signed the Code.⁴⁷ “Companies hear about the Code through big players who are active, and that in turn spawns more interest for others to get involved,” Guelbart notes.⁴⁸

Prior to Carlson's signature, approaching the private sector was “depressing”, says Guelbart. “[Companies] felt they could say that it wasn't their problem. It was the ‘other’ hotel, other personnel. They didn't need to train their people. But unless you train on this issue, your hotel will be used, period.”⁴⁹

Carlson currently conducts a variety of training and awareness programmes to keep its staff informed. The Carlson Rezidor Hotel Group, one subsidiary, has designed programmes for all hotel managers and employees. The programme, which is mandatory in its 1,300+ hotels worldwide, is delivered through a train-the-trainer approach. Through the years, Carlson has trained nearly a thousand hoteliers, who have in turned trained thousands more.

Another global hotel company, Marriott International, has put in place comprehensive policies and initiatives related to human trafficking. It has included human trafficking in its human rights policy and in a guidebook used by its 70+ councils – groups of Marriott hotel executives who work together to define the company's government outreach and advocacy programme.⁵⁰ In addition, it trains its employees to be alert to human trafficking. For example, it has developed a specific training programme for its

Figure 5: Code signatories



loss prevention directors and officers, which is required if they are to be certified. The American Hotel & Lodging Association has incorporated the training into its own certification programme for security officers across Asia, Europe, the Middle East and Africa.⁵¹ The company is also a member of the International Tourism Partnership's Human Trafficking Working Group, and helped create an industry position statement on human trafficking that aims to raise awareness, address corporate policies, and exchange promising practices.

Marriott has been a leader in creating innovative public-private partnerships to help survivors of human trafficking in various countries. It has also worked to expand the reach of the Youth Career Initiative (YCI), its community partner, using its hospitality employment courses to train young victims of sexual exploitation. So far, 30 survivors of human trafficking

have gone through the YCI and 75% of them have found a job a month after finishing the programme. In 2010, Marriott worked to introduce the YCI and its programmes to the US Department of State's Office to Monitor and Combat Trafficking in Persons. Two grants, totaling \$500,000, were provided to the YCI and it has now introduced its programmes in Mexico and Vietnam, with other cities to follow.⁵²

Hilton Worldwide has also conducted employee training and has supported anti-human trafficking efforts since 2011. The company focuses not only on engagement at the strategic level and within its own organization, but also on helping survivors who need skills and job training. In 2013, Hilton partnered with Vital Voices Global Partnership to launch the Global Freedom Exchange, an educational and mentoring programme where 26 women leaders from 13 countries shared knowledge and skills with participants, helping them develop professionally and allowing them to better serve their communities.⁵³ "It was about giving women leaders the resources and opportunities to come to the US and build a network related to their work in other countries," says Jennifer Silberman, the vice-president of corporate social responsibility for Hilton Worldwide. It is hoped the initiative will spawn a broader awareness of human trafficking and the preventative actions that can be taken to stop it from a hotel management perspective.

Marriott International and Hilton Worldwide have reinforced their commitments to preventing human trafficking by working together on events such as the first annual Operation Underground Railroad Gala, to benefit a non-governmental organization fighting human trafficking worldwide.

To ensure such commitments last, Silberman and other experts agree that the buy-in of top management is necessary. Efforts to tackle human trafficking must be reframed, highlighted and incorporated through a sound strategy. The following are some lessons experts have learned in how to successfully integrate anti-human trafficking into the culture of their organizations.

Figure 6: The six criteria of the Code

- 1 **TO ESTABLISH A POLICY AND PROCEDURES**
against sexual exploitation of children
- 2 **TRAIN EMPLOYEES**
in children's rights, the prevention of sexual exploitation and how to report suspected cases
- 3 **INCLUDE A CLAUSE IN CONTRACTS**
throughout the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children
- 4 **PROVIDE INFORMATION TO TRAVELERS**
on children's rights, the prevention of sexual exploitation of children and how to report suspected cases
- 5 **SUPPORT, COLLABORATE & ENGAGE STAKEHOLDERS**
in the prevention of sexual exploitation of children
- 6 **REPORT ANNUALLY**
on your implementation of The Code

Source: thecode.org

Lesson 1: reframe trafficking as a risk and security issue to ensure corporate commitment

In order to convince top management that trafficking is a priority, it must be reframed as a risk to the business rather than a philanthropic effort, says Silberman. Silberman helps to oversee corporate social responsibility efforts at more than 4,000 properties across 10 brands, including DoubleTree by Hilton, Embassy Suites, Waldorf Astoria and Hilton Garden Inn. In 2011, she began to advocate for a corporate strategy to tackle human trafficking, arguing that it was a security and safety risk.

“Any time an illegal business activity is taking place, you’re compromising the safety of your business and guests,” she says. “The last thing you want is your hotel to be unsafe. If these activities are happening, you are compromising the environment that the hospitality staff have worked so hard to create.”⁵⁴

Risk and security are aspects of management that are more liable to appeal to more conservative actors such as the general counsel, adds Mark Lagon, a former US ambassador and now a professor of international affairs at Georgetown University who works with the advocacy group ECPAT.

Risk-averse decision-makers can be hesitant to adopt an anti-human trafficking policy because of the potential liability such a public declaration would entail. “If we make that pledge against human trafficking within our supply chain and management, should there be litigation, the reward will be larger,” he says of the mentality. “That is a perverse incentive. There needs to be a positive payoff for companies who hold themselves accountable.”⁵⁵

Lesson 2: adopting anti-human trafficking policies can enhance brand value

For those who do adopt anti-human trafficking policies, there is a big business payoff, says Guelbart. “A lot of companies now include language about human trafficking in their proposals. They have a set of questions: ‘Are you a member of the Code? Do you follow minimum Code conduct?’ This in turn impacts which hotels get contracts, and that translates into more customers.”⁵⁶ One such company is the Carlson Rezidor Hotel Group, which requires an anti-trafficking clause in all contracts. Suppliers and partners are required to state that they have not knowingly engaged in the sexual exploitation of children or forced child labour, and will never do so.

Silberman notes that this kind of commitment has won over customer loyalty at the Hilton. “There’s been excellent feedback from B2B customers, as well as those in faith-based organizations. As we become more involved with faith-based investors in the corporate social responsibility space, ensuring an ethical commitment to anti-human trafficking is something that is important to them.”⁵⁷ Guelbart agrees. “Corporate and religious travel are two segments of

Local champions: Steve Steinberg and the 5K run

When Hilton Garden Inn general manager Steve Steinberg gathered with colleagues to organize a race in 2014, there was little room to debate the cause they would run for. “We’re choosing human trafficking,” Steinberg said.

Long passionate about fighting human trafficking and exploitation, Steinberg saw an opportunity to organize and spread awareness about the topic in his local community. Coordinating with 18 Hilton Garden Inns in the DC metro region, Steinberg successfully raised over \$12,000 in 2014 through the TrafficStop 5k – Racing to End Human Trafficking.

Not only did participants receive a commemorative T-shirt manufactured by trafficking survivors, but all proceeds were donated to advocacy groups, including Vital Voices, Justice Ventures, the Polaris Project and Stop Modern Slavery.

“Steve Steinberg is a great local champion,” notes Silberman. “He’s an example of what local properties can do to create awareness.”

visitors who will book out large conferences and sometimes an entire property. They’ll go to a hotel if they know they’ve signed the Code because it supports a good cause and it’s also good business.”⁵⁸

“An important aspect is the awareness of shareholders not preferring profit over human rights, but shareholders equating value as human rights,” Lagon adds. “It’s about enhancing the brand value because the company is associated with sustainability and community.”⁵⁹

Lesson 3: engage employees to create a new corporate culture

Creating a corporate culture around philanthropic activity necessitates employee buy-in. Carlson has found that the best way to spark employee enthusiasm is to directly tie the cause to an incentive. Whether it is a day off, a day spent volunteering with the chief executive officer, or even the chance to wear jeans for an entire month (the annual Casual for a Cause Challenge), Carlson spurs greater philanthropic momentum by offering incentives for its different projects.

“One event that has been especially popular has been our leadership activity with Trudy Rautio and David Berg, the chief executive officers,” says Tammy Lee Stanoch, the

vice-president of corporate communications for Carlson. “Employees who invested in this activity were able to spend the day both volunteering for a good cause and engaging with top management.”⁶⁰ For the 2014 campaign, bags of toiletries were packed and donated to Breaking Free, a non-profit that helps victims to live and find a job outside of the sex industry.

Stanoch also notes that top management strongly supports the cause by matching employee donations during its annual Community Giving Campaign. Last year, \$850,000 was raised, \$400,000 of which was donated by employees. In the “You’re Hired” Challenge, for example, all gifts made to the Breaking Free job skills initiative were doubled by Trudy Rautio.

Lesson 4: top management advocacy can enable knowledge transfer and spillover

When a large, credible brand signs anti-human trafficking legislation, it not only has a multiplier effect among direct competitors, but it can also spill over into other types of businesses. Guelbart notes that companies such as Sabre, which supplies the travel industry with business-to-business marketplaces, signed the Code after Carlson raised the issue with their chief executive officer. “Their corporate culture really grabbed at this – their decision was top down,” says Guelbart.

Sabre’s adoption of the Code is particularly instructive because it is not a business on the “frontline” of trafficking, but is still a major player in the industry. After working with ECPAT in 2012, the company launched Passport to Freedom, a corporate responsibility programme that increases awareness and educates the travel industry on human trafficking issues, advocates for legislative change, and provides opportunities for leaders to collaborate.⁶¹ “They’re very outspoken about their goals and desires,” adds Guelbart. “There’s no shying away from this issue with them.”

Carlson continues to fund cross-sectoral training in the industry and offers it to competitors in other hotel groups for free, as well as to members of the American Hotel & Lodging Association.

Significant progress – but still more work to be done

While experts in the field acknowledge that the hospitality industry is one of the most active on the issue of human trafficking, there is still much work to be done.

For one, in the United States and in many other countries, hotels are more successful in regulating and controlling human trafficking in hotels they actually own, but they don’t have the same control over properties that are franchised. With franchised hotel chains, there is less oversight and less ability to directly influence training, awareness-building and compliance. As a result, they may not uphold the same high standards when it comes to dealing with human trafficking.

The hospitality industry also needs to look beyond sex

“We in business can almost always do a better job in the community than can big government. We’re closer to the problems, we’re more creative in our solutions, and we’re certainly more dollar-wise.”

Curt Carlson, Founder, Carlson Companies

trafficking to other types of human trafficking. “There’s a bit of an issue in all trafficking discussions as to what area to focus on,” says Faris Natour, the director of human rights at Business for Social Responsibility. “The travel and tourism sector is more comfortable focusing on sexual exploitation because it’s about criminal organizations committing crimes and they are in a position to prevent that. That’s a much more comfortable story than looking under your own rug and acknowledging that, say, your cleaning or kitchen staff have a high risk of being trafficked.”⁶²

Conclusion

The private sector has made much headway in the global fight against human trafficking, and there is still more to come as new companies sign on to address this human rights abuse.

As the **financial sector** demonstrates, using data analysis tools, there is much that can be done to identify potential traffickers and their transaction patterns. But raw data or suspicious activity reports alone are less effective than a multistakeholder effort, which combines the qualitative insights of law enforcement with the quantitative analytical power developed in-house by the finance sector. Whereas suspicious financial transactions may not reveal much about the presence of human trafficking, the analysis of metadata can provide many insights and leads for law enforcement.

The **technology sector** has demonstrated how it is possible to invest in combating human trafficking by supporting research and collaborative efforts to understand how technology is used to facilitate this crime and the ways in which such patterns can be disrupted.

As shown in the **hospitality and tourism sector**, anti-trafficking practices can be established thanks to the engagement and passion of one corporate leader or through employees. Both officials at the top and personnel within a business can light a spark that will run throughout the entire corporation. A commitment from senior management to fully engage on this issue creates a cultural shift in the company and beyond, spilling over to other sectors and industries.

The **transport sector** has also shown how individuals can make a significant difference. The case studies of Innocents at Risk and Truckers against Trafficking show how employees working in different parts of the transport sector can raise awareness, enhance prevention and even flag potential cases of human trafficking. The transport sector shows that best practices in the corporate world do not need to come from leadership but can be bottom-up efforts.

Both the hospitality and tourism sector and the transportation sector have demonstrated how entrepreneurial thinking and innovative public-private partnerships can prevent trafficking and provide support for survivors. When NGOs work with corporations to combine resources and share solutions, this can have an industry-wide influence and result in systemic change. NGOs can most successfully engage with corporations through their personnel, trade associations and conferences.

The practices in the analysed sectors can be replicated in other sectors. Participation in combating labour trafficking may be more difficult to obtain than for sexual trafficking. Furthermore, progress can be made fastest when a “safe space” is created to begin the initial conversation.

To create that space, it is helpful to keep several factors in mind:

- Framing human trafficking as a **risk to a business** is an important part of engaging top management and shareholders. This can appeal to more conservative actors in an organization by focusing on the idea of security and reputational enhancement.
- When dealing with **supply chain management**, we **need to move beyond the cascading sourcing method**, i.e. the practice of handing agreements down the supply chain to the point that responsibility and accountability is removed from the highest-up actors.
- In order to build capacity in a certain industry or sector, coalitions must do more than simply function as a safe space and should become arenas for best-practice sharing. This allows companies to share their protocols with one another and benchmark their successes.

As the anti-trafficking community looks for innovative interventions and solutions to this global crisis, it is vital to engage the private sector in the issue. Academic institutions, particularly business and policy schools, can play a key role in training the next generation of business and community leaders in anti-trafficking strategies, as more and more companies begin to address the issue. Public-private partnerships are the wave of the future and will link business, government and civil society together in entrepreneurial collaborations and resource sharing.

The timing could not be more critical. As Verité’s website states:

“You might think about debt bondage in relation to making bricks in South Asia or building skyscrapers in the Middle East, not putting together the pieces of your newest mobile phone or laser printer in Malaysia. But if you are reading this on a tablet, smartphone or computer monitor, then you may be holding a product of forced labour. Verité’s two-year study of labour conditions in electronics manufacturing in Malaysia found that one in three foreign workers surveyed in Malaysian electronics was in a condition of forced labour. Because many of the most recognizable brands source components of their products from Malaysia, this means that virtually every device on the market today may have come in contact with modern-day slavery.”⁶³

Much has been accomplished in the sectors studied in this publication, and as future sectors and more companies become engaged, the world will be that much closer to eradicating human trafficking.

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