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Sex Trafficking: The Hospitality Industry's Role and Responsibility

Abstract

This research explores the issue of sex trafficking in hotels within the United States. Research was conducted regarding the prevalence of the issue, legal implications for hotels, resources available and current initiatives taken by companies. Surveys and interviews were conducted to identify the overall sentiments of hoteliers on the issue and potential solutions suggested by agencies that work against trafficking. The research identifies a strong need for training and increased awareness among hotels.

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Sex Trafficking:
The Hospitality Industry's Role and Responsibility

By

Giovanna L. C. Cavagnaro

A thesis submitted in partial satisfaction of the requirements for the degree of

Bachelors in Science

In

Hotel Administration

In the

SC Johnson College of Business

At

CORNELL UNIVERSITY

**Sex Trafficking:
The Hospitality Industry's Role and Responsibility**

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By

Giovanna Cavagnaro

The thesis entitled Sex Trafficking: The Hospitality Industry's Role and Responsibility

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May 2017

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By

Giovanna L. C. Cavagnaro

Bachelor of Science

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This research explores the issue of sex trafficking in hotels within the United States. Research was conducted regarding the prevalence of the issue, legal implications for hotels, resources available and current initiatives taken by companies. Surveys and interviews were conducted to identify the overall sentiments of hoteliers on the issue and potential solutions suggested by agencies that work against trafficking. The research identifies a strong need for training and increased awareness among hotels.

Key words: sex trafficking, hotel, hospitality, human trafficking, awareness, training, policy, traffickers, crime, legislation, responsibility

Author's Biography

Giovanna Cavagnaro, School of Hotel Administration Class of 2017, was born and raised in Brazil and moved to Alpharetta, GA at the age of 15 in order to pursue a better education.

Giovanna feels privileged to have had diverse work experiences while at Cornell. The summer of her freshman year she went to southern Italy, where she interned as a front desk agent at a luxury resort. The following summer she was a researcher for Israeli government agencies in Jerusalem, Israel, writing reports surrounding policies for people with disabilities. Her final summer as an undergraduate, she stayed in the country, interning for CBRE Hotels in Chicago, IL. Upon graduating, Giovanna will be an analyst at LaSalle Hotel Properties, a real estate investment trust located in Bethesda, MD.

Within the School of Hotel Administration, Giovanna has been a teaching assistant for six courses: Business Computing, Financial Accounting, Principles of Real Estate, Advanced Business Modeling, Real Estate Finance, and Management Communication. Additionally, Giovanna is also a part of the Hotel Leadership Development Program (HLDP) where she is a Manager at the Human Resources office for the SC Johnson College of Business. Outside of the hotel school, Giovanna is heavily involved with Christian communities in Ithaca, taking on several leadership roles on campus. Throughout her entire college career, Giovanna has been the worship team leader for Christian Union as well as being involved with Worship Workshop. Moreover, Giovanna served as President for Campus on a Hill (COAH), an organization that works towards uniting the Christian fellowships and churches in Ithaca.

Being at Cornell has given Giovanna incredible opportunities to discover the world. In 2015 alone, Giovanna traveled to 20 different countries, what she now claims as her fun fact for life. Giovanna has academically thrived at Cornell, which led her to being a part of Ye Hosts Honorary Society, an honor's society formed of the top 10% of students in the school.

At the end of her Senior year, Giovanna was awarded the CHS Senior Prize, a very prestigious scholarship that also awarded her the honor of being the speaker at the Hotel School's graduation.

Dedication

To my one and only savior, Jesus Christ.
He is the reason why I see intrinsic value in every human being.
Without Him, I would not have the motivation to write this thesis.

Acknowledgements

With a heart filled with gratitude, I thank all of those who poured themselves out to further my education and professional development.

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To my peers who struggled with me through classes, prelims, assignments, and finals, but also made the journey so much more enjoyable. Long live the hotelie mafia!

To my little brother, who is the first continue my legacy in the Hotel School. May your time here be doubly as enriching as mine has been.

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EXECUTIVE SUMMARY

The hospitality industry is undoubtedly involved in the sex trafficking industry, whether knowingly or not, due to the ease of traffickers to use hotels for trafficking. Hotels offer anonymity, privacy, and non-traceability, making hotels a top venue for the crime. Hotels, therefore, have an inherent responsibility to deter the crime and can be liable for failing to do so. While most associate the crime of trafficking to developing countries, the issue is very prevalent in the United States.

In this research, hotels and agencies were surveyed regarding the current sentiments of the industry and potential steps for the future. It was found that while hoteliers feel that trafficking is a global problem, they do not believe that trafficking is an issue in their own hotels. In terms of potential initiatives to mitigate the problem, the two largest needs are increase in training and awareness.

Therefore, hotels should be required to train all their employees on identifying and reporting sex trafficking. Moreover, awareness materials should be made available in the hotels in order to increase awareness among guests while also giving potential victims a way to seek help and showing traffickers that they are being watched. By taking a stand against the crime, hotels would decrease the ease of traffickers to perpetrate illegal activity, in turn saving lives and providing freedom to the currently enslaved.

BACKGROUND

Sex trafficking is defined under the Trafficking Victims Protection Act as “the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes of a commercial sex act¹, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age”². Though obtaining data on the issue is difficult given the great number of unreported and underreported cases, the ILO (International Labor Organization) recognizes human trafficking as the second largest illicit crime industry (behind only the sale of drugs), with an estimated \$150 billion earned in 2014. The same study estimates that 20.9 million are victims of human trafficking worldwide, with over 26% of the victims being children. Between 100,000 and 300,000 American children are at risk of being trafficked every year.

It is important to note that the definition of trafficking is not limited to the movement of a victim, but also encompasses the exploitation of victims through fraud or coercion. This means a person can be a victim of sex trafficking locally and the current reality is that it occurs on American soil. Moreover, the definition lists force, fraud or coercion as a necessary element for trafficking only if the victim is older than 18. Any person under the age of 18 in the sex industry is, by definition, a victim of human trafficking as they are legally unable to give consent; there is no need to show force, fraud, or coercion was used because the definition assumes that anyone under 18 has not chosen the situation they are in.

¹ Commercial sex acts include: prostitution, pornography, and sexual exploitation

² “Trafficking Victims Protection Act” (2013)

Child victims are usually pulled into trafficking between the ages of 11 and 14. Once they are involved, it is difficult to escape due to drug addiction, danger to self and family, life-ending disease, poor health, violence, suicide, and lack of support for help. While many have heard of the stories where families sell their kids into sex slavery in Southeast Asia, trafficking occurs all around the world, including in the US.

Often well intentioned families are fooled into believing that they are sending their children off to better lives to “language schools and employment apprenticeships.” Other victims include foster kids, runaways, and confused children recruited by pimps at common public areas. However, the recruitment is increasingly taking place online. CLAWS (Civil Lawyers Against World Sex Slavery) as well as other organizations confirm that hundreds of thousands of children are exploited or at risk for trafficking within the United States each year. Children in particular are an easy target for traffickers as they are easily lured and kidnapped, the earning opportunities are strong due to tremendous demand, and the victims can be sold repeatedly to multiple customers each day. According to CLAWS and Street Grace (2013), traffickers earn between \$25,000-33,000 per week selling sex in Atlanta alone.

Most people buying sex are men and men are the primary facilitators. Their median age is 49, 56% are married, 25% have kids under 18, and 50% have higher than median incomes.³ Additionally, those on the demand side of the transaction (i.e. those purchasing acts of sex) often choose to engage in trafficking when they are traveling away from their home city, thus naturally increasing the involvement of hotels. In fact, a Norwegian study found that 80% of those who paid for sex acts did so abroad. Norway found success in outlawing buying sex rather than

³ Sarkisian (2015)

selling sex. Moreover, “shaming” tactics of publicizing names and boldly harming perpetrators’ reputations also proved to be effective. Thus, inhibiting the demand as well as the supply side is effective. On the other hand, Germany’s problem worsened after legalizing prostitution.

According to the CDC (Centers for Disease Control), Americans and US permanent residents account for 25% of the demand for child sex worldwide. Thus, Americans are involved in the problem not only because trafficking is frequently occurring in America, but also because Americans are feeding the demand for commercial sex when traveling abroad.

HOSPITALITY INDUSTRY:

The hospitality industry has become a participant in the worldwide epidemic of sex trafficking due to the fact that traffickers often use hotel rooms to move and exploit victims. According to a 2012 BEST study, 63% of trafficking incidents happen in hotels, ranging from luxury to economy, with the majority of victims being children.⁴ In NYC alone, 45% of reported exploitation took place in a hotel, including The Ritz Carlton and The Plaza. The infrastructure of the travel industry eases the participation and transportation of exploited persons.

The internet has assisted the crime by giving traffickers anonymity and access. The pornographic and sex-filled culture has intensified the issue and decreased the shock effect of sex trafficking. Classified ads are harder to spot online and trigger immense interest (one ad alone led to 27 calls in 90 minutes).⁵ However, these ads can also become a tool used against the sex trafficking industry, as several hotel professionals can often recognize hotel rooms depicted in the ads.

Trafficking networks often rely on legitimate businesses, including hotels, to sustain their illegal operations and infrastructure. Hotels allow for a degree of anonymity. A common example is the guest's ability to pay with cash without being questioned. While sex trafficking occurs in a variety of venues, including truck shops, fake massage businesses, and strip clubs, hotels provide the most difficulty in tracing the perpetrator, because once a guest checks out of the room, little traceability is left for the guest. The hospitality industry has the greatest reach in terms of identifying the exploitation where it's most likely to occur; the industry has the power

⁴ "Best Alliance" (2013)

⁵ Sarkisian (2015)

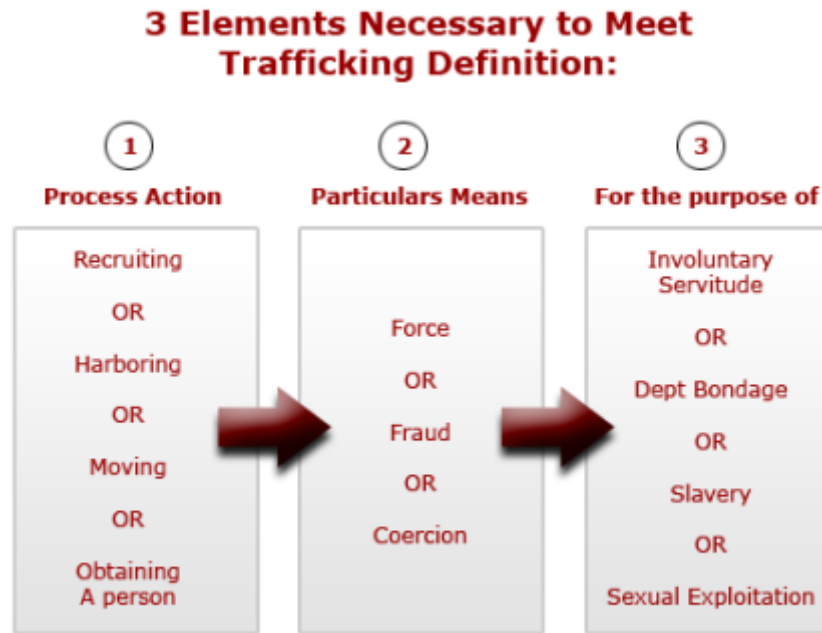
and responsibility to be a part of the solution to the issue, given its role in the crime, knowingly or unknowingly.

LEGAL ENVIRONMENT:

The main law in the United States surrounding sex trafficking is the Trafficking Victims Protection Act (TVPA) of 2000 and its amendments. The TVPA provides the legal framework to combat human trafficking both domestically and internationally. It can be considered the cornerstone of federal human trafficking legislation, having established methods of prosecuting traffickers, preventing human trafficking, and protecting victims and survivors of trafficking. The act establishes human trafficking and related offenses as federal crimes, and attaches severe penalties to them. It also mandates that restitution be paid to victims of human trafficking. The act works against sex trafficking internationally by establishing the Office to Monitor and Combat Trafficking in Persons, which is required to publish a Trafficking In Persons (TIP) report each year; the TIP report describes and ranks the efforts of countries to combat human trafficking. The act also established the Interagency Task Force to Monitor and Combat Trafficking, which assists in the implementation of the TVPA. Furthermore, victims and survivors of human trafficking are protected through the establishment of the T visa, which allows victims of human trafficking, and their families to become temporary U.S. residents and eligible to become permanent residents after three years.

The TVPA has been amended several times through reauthorization acts in 2003, 2005, 2008 and 2013. The law also defines trafficking as the previously stated definition. The picture below depicts the elements required for trafficking to be present. The only exception is when the alleged victim is a minor, in which case force, fraud, or coercion is not required to prove trafficking was present.

Figure 1: Trafficking Definition



Source: Trafficking of Victims Protection Act

Hotels and its employees can be held both civilly and criminally liable for sex trafficking occurring on a hotel’s premise. Under the definition of sex trafficking, hotels can be complicit through harboring a victim (either a minor engaging in sex acts or anyone of age coerced into sexual exploitation). Hotels, as corporations, can be held criminally liable for sex trafficking by either being held vicariously liable for the acts its employees commit, if the employees were acting as agents of the hotel, or if it knowingly receives financial benefit from participation in the illegal venture. Hotel employees can personally be held liable through “harboring” the victim via renting a room to the trafficker, knowing or in reckless disregard of the fact that sex trafficking was occurring.

The Federal law also broadly allows a victim of human trafficking to bring a civil claim against his or her trafficker (anyone who has engaged in the sexual exploitation through buying

or selling) as well as anyone who financially benefited from his or her victimization and knew or should have known the acts were in violation of human trafficking law. Under this framework, a hotel can be liable if it, by way of an employee, knowingly rents a room to a trafficker (either a “pimp” or buyer of sex) or should have known that it was renting a room to a trafficker for that purpose.

While this legislation is hardly ever used against hotels, it reflects a liability for hotels who are not active in guarding their business and their guests against the dangers of trafficking. Notwithstanding, hotels legally owe the highest duty of care to their guests; regardless of the direct legislation surrounding trafficking, hotels have the responsibility to protect their guests. Moreover, this criminal activity poses not only a legal liability, but also a great risk for the safety and security of hotel businesses, as well as legitimate hotel customers.

That being said, a recent case in Pennsylvania has shown that hotels can indeed be held liable. The Philadelphia hotel Roosevelt Inn, its corporate parents, its New York management company, and an individual owner/manager of the hotel, were sued for allegedly allowing trafficking of sex involving a minor to take place on the hotel’s premises. The case is the first of its kind invoking Pennsylvania’s recently-amended human trafficking law.

The lawsuit alleges that the hotel “knew or had constructive knowledge” that their premises were being used for the sexual exploitation of victim. The complaint alleges a number of potential indicators for sex trafficking at the hotel, including men lingering in the hall outside the room, older men accompanying the victim in the hotel, the victim being treated aggressively and exhibiting fear and anxiety, cash payments for the room, regular refusal of housekeeping services, and the victim. Having few or no personal belongings and dressing in a “sexually

explicit manner, should have tipped off the hotel to what could be occurring. The complaint asserts causes of action for negligence, negligent infliction of emotional distress, and intentional infliction of emotional distress.

In the U.S., penalties for supplying human trafficking have been minimal and the enforcement of human trafficking laws has been lacking. Until recently, many states only charge a \$50 fine for a misdemeanor. Fortunately, many states have begun to change the trend; for instance, in Georgia trafficking has been upgraded to felony status with the prospect of jail time. The “Not Buying It Campaign”, a campaign with the initiative to strategize ways to end sex trafficking in the state of Georgia was crafted by the state’s attorney general and Street Grace; Georgia has also shared the campaign with other states, namely Arizona, South Carolina, and Indiana, who now have also adopted and implemented it.⁶

Additional information on legislation applicable to sex trafficking, though less applicable to the hotel industry, can be found in the appendix.

⁶ “Street Grace” (2013)

TRAFFICKING INDICATORS

The following lists the most common indicators that can be found by perpetrators or victims of sex trafficking in hotels.⁷ If a hotel employee were to observe some of these in a guest, they may have reason to contact the National Human Trafficking Hotline for further assessment.

- Pays for room in cash or with pre-paid card
- Extended stay with few possessions
- Requests room overlooking parking lot
- Presence of excessive drugs, alcohol, sex paraphernalia
- Excessive foot traffic in/out of hotel room
- Frequently requests new linens, towels, and restocking of fridge
- Exhibits fearful, anxious, or submissive behavior
- Dresses inappropriately given the climate
- No control of money, cell phone, or ID
- Restricted or controlled communications
- No knowledge of current or past whereabouts
- Signs of poor hygiene, malnourishment, or fatigue
- No freedom of movement, constantly monitored

Upon noticing concerning indicators, an employee should know what their hotel's procedure is on reporting a suspicion of sex trafficking (assuming the hotel has an appropriate policy and procedure). However, security and/or law enforcement should be alerted about the issue as opposed to the employees trying to handle the matters themselves. Several organizations provide support to hotels who wish to partner and take action against the crime.

⁷ "Polaris" (2016)

RESOURCES & INITIATIVES

Blue Campaign: The U.S. Department of Homeland Security (DHS) created a toolkit to assist the hospitality industry in combating human trafficking. The training gives the definition of human trafficking and the forms it exists in (namely sex trafficking, forced labor, and domestic servitude). It also includes pamphlets for each department of signs and what to do in case of a suspicion. Examples of these pamphlets can be found in the appendix.

The Code: The Code (short for “The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism”) is an industry-driven responsible tourism initiative with a mission to provide awareness, tools and support to the tourism industry in order to prevent the sexual exploitation of children. The Code is run by ECPAT-USA (short for “Ending Child Prostitution and Trafficking), a leading anti-trafficking policy organization in the United States. ECPAT-USA belongs to an international network of organizations in 75 countries, all working to end the commercial sexual exploitation of children. The Code was created specifically as a tool for the travel sector; it aims to address the crime of child sex tourism by creating a highly aware and well-trained tourism industry that can recognize and prevent potential abuse and also by building zero tolerance environments where travelers understand that these crimes are unacceptable and offenders will be prosecuted.

When a tourism company joins The Code they commit to taking six essential steps to help protect children, which we call the six criteria of The Code. These are:

Figure 2: 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: The Code Website

Signing the Code is a great way for a hotel to take initiative but also receive support from the ECPAT staff to understand how to effectively combat trafficking on their premises. More than 300 tourism companies around the world have signed on to the code. Tourism companies join The Code because it is humanitarian but also because it makes business sense to take initiative against the crime. Soon it will become an industry standard and those not taking action will stand out; many meeting planners and corporate travel professionals are beginning to require it in their contracts, thus forming additional demand to take action. Several national tourism ministries are also active in promoting The Code as a responsible tourism initiative in their countries.

National Human Trafficking Hotline: The National Human Trafficking Hotline is a national anti-trafficking hotline serving victims and survivors of human trafficking and the anti-trafficking community in the United States. The toll-free hotline is available to answer calls from anywhere in the country, 24 hours a day, 7 days a week, every day of the year in more than 200 languages. The hotline can also be used by those who suspect trafficking is happening and would like to either report it or discover if the suspicions are likely signs of a true case of trafficking.

The hotline is run by Polaris, a leader in the global fight to eradicate human trafficking. Its work includes identifying and responding to human trafficking cases, passing legislation against human trafficking, training individuals and organizations, and partnering strategically to increase its reach in the fight against this crime.

Online training course for hotels: The American Hotel Lodging Association (AHLA) formed a partnership with Polaris and ECPAT-USA to create an online training program designed to help hotels learn to combat human trafficking. The course is called “Your Role in Preventing Human Trafficking: Recognize the Signs,” and it provides an overview of the issues of human trafficking, suggested protocols for responding to suspicious activity, and signs of trafficking specific to different hospitality positions (in-room staff, restaurant, lobby, and security). Objectives of the course include:

- Defining human trafficking and commercial sexual exploitation of children;
- Identifying individuals who are most at risk for human trafficking;
- Understanding the difference between labor and sex trafficking specific to the hotel sector;
- Explaining the role of hospitality employees in responding to this issue.

The cost associated with purchasing the course is outlined below:

Figure 3: Cost of Training

Number of Rooms	AHLA Member Fee	Non-Member Fee
1-100 rooms	\$500	\$625
101-300 rooms	\$750	\$950
301-500 rooms	\$1,000	\$1,250
501+ rooms	\$2,500	\$3,125

Source: AHLA Website

According to AHLA, the following hotel companies have spearheaded an initiative to combat sex trafficking in their organizations:

- Best Western International
- Carlson Rezidor Hotel Group
- Hilton Worldwide
- Hyatt Hotels Corporation
- Intercontinental Hotel Group (IHG)
- Marriott International
- Starwood Hotels & Resorts
- Wyndham Hotels & Resorts

While these companies are to be applauded for taking a stand against an important issue, a common problem is that a corporate policy can be easily overlooked by the properties themselves. Companies should ensure that the hotels themselves are aware of the policies

implemented and follow through the procedures designed; otherwise, the initiative will not have the necessary result of identifying and reporting trafficking occurring on premises.

Additionally, the following states' hotel industries have taken initiative to combat sex trafficking:

- Arizona
- Georgia
- Hawaii
- Rhode Island
- Oklahoma
- Washington State
- Wisconsin

More detailed information on each of these companies' and states' initiatives can be found in the appendix.

While the aforementioned resources and initiatives are the most directly applicable to the hospitality industry, numerous other incredible organizations are fighting against human trafficking. Additionally, local governments often take initiatives in their own area and they can be an extremely effective and efficient avenue for a hotel to get involved make an impact in their own community.

RESEARCH METHODOLOGY

Two surveys were conducted. One survey was created for hotels in order to capture their understanding, perspective, and sentiments surrounding the issue of sex trafficking; the other was created to capture for agencies that work against sex trafficking in hotels to understand the issue and how it could be solved.

Hotel Survey

The first survey involved asking hotels questions on the issue of sex trafficking and how it relates to the hotel industry. In order to get a truly random sample, a randomized list of 1000 hotels throughout the United States from Smith Travel Research (STR) was used. It is safe to assume that this sample is a fair representation of the hotels in America, as it was completely random; no sorting was done to geographic location, scale, or size.

The survey was sent via email to all 1000 hotels. The estimated time to answer the survey was 3 minutes. Only 38 hotels responded, thus yielding a 3.8% response rate. The questions for the hotel survey is listed below:

1. To what extent are you familiar with the issue of sex trafficking?
2. To what extent are your employees familiar with the issue of sex trafficking?
3. To what extent do you believe the hospitality industry contributes to the sex trafficking industry?
4. To what extent do you believe the hospitality industry fulfills its responsibility to combat sex trafficking?

5. To what extent would your company be willing to implement training on how to identify and report potential trafficking?
6. To what extent would your hotel(s) be willing to ask guests if they are involved with sex trafficking, either on the demand side or the supply side, upon booking or checking in?
7. To what extent are you willing to involve law enforcement when sex trafficking is suspected?
8. To what extent are you willing to involve an NGO when sex trafficking is suspected?
9. To what extent are you willing to provide information to increase awareness of sex trafficking amongst guests and/or employees?
10. To what extent do you recognize sex trafficking as a global issue?
11. To what extent do you believe sex trafficking is an issue in your area?
12. To what extent do you believe the presence of sex trafficking at your hotel(s) could be detrimental to your daily operations?
13. Does your company participate in The Code?

Agencies Survey

The survey for agencies working against sex trafficking was much more open ended and lengthy. Eleven agencies were emailed and given the option to either respond to the survey in written open answer or schedule a call to have an interview with the survey questions answered over the phone. Five agencies responded to the survey, two of them writing the answers and the remaining three opting for a phone interview. Two agencies responded that they did not have the available time to respond to the survey and the remaining four agencies did not respond in any capacity. Thus, the final response rate for the agencies survey was 45.5%.

1. How do you believe the hospitality industry contributes to the sex trafficking industry?
2. Do you believe the hospitality industry fulfills its responsibility to combat sex trafficking?
3. What are the top 2-3 things the hospitality industry can do to combat sex trafficking?
4. What are ways the hotel industry can mitigate risks of negative publicity surrounding sex trafficking?
5. How can the hospitality avoid falsely reporting someone of sex trafficking?
6. What are the costs (monetary or otherwise) of training employees to identify and report potential trafficking?
7. How is sex trafficking activity different than other illegal activities that may occur in hotels? (ex. drugs, etc)
8. Are there certain hotels, types of hotels or particular locations that attract sex trafficking activity? If so, which ones? What causes it to be this way?
9. What motivates hotels to do something about the problem? Do you recommend anything that could further motivate hotels?
10. Do you see a tendency for hoteliers to believe that the problem is not occurring in their immediate area?
11. Are there tax incentives associated with acting against sex trafficking?
12. Does any current legislation potentially hold hotels liable for sex trafficking offenses occurring on property?

HOTEL SURVEY

A response rate of 3.8% is already an immediate indicator that hotels do not tackle the issue of sex trafficking appropriately. Despite a large sample of 1000 hotels, the response rate was minimal; thus, the responses included may be of the population who is generally more aware and more willing to handle the matter.

The chart below summarized the overall responses for each question:

Figure 4: Survey Results Summary

Agree Very Little/Not At All	Moderately Agree	Strongly Agree
To what extent do you believe sex trafficking is an issue in your area?	To what extent are you familiar with the issue of sex trafficking?	To what extent do you recognize sex trafficking as a global issue?
To what extent would your hotel(s) be willing to ask guests if they are involved with sex trafficking, either on the demand side or the supply side, upon booking or checking in?	To what extent are your employees familiar with the issue of sex trafficking?	To what extent would your company be willing to implement training on how to identify and report potential trafficking?
	To what extent do you believe the hospitality industry contributes to the sex trafficking industry?	To what extent are you willing to involve law enforcement when sex trafficking is suspected?
	To what extent do you believe the hospitality industry fulfills its responsibility to combat sex trafficking?	To what extent are you willing to provide information to increase awareness of sex trafficking amongst guests and/or employees?
	To what extent are you willing to involve an NGO when sex trafficking is suspected?	To what extent do you believe the presence of sex trafficking at your hotel(s) could be detrimental to your daily operations?

Source: Author

Below are more detailed analyses of each question. In order to get the mean and standard deviation, numbers were assigned to each response choice, as seen below:

Figure 5: Survey Response Options

1 = Not at all	2 = Very little	3 = Neutral	4 = Moderately	5 = Strongly
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Q1: To what extent are you familiar with the issue of sex trafficking?

Figure 6: Hotel Survey Q1 Chart

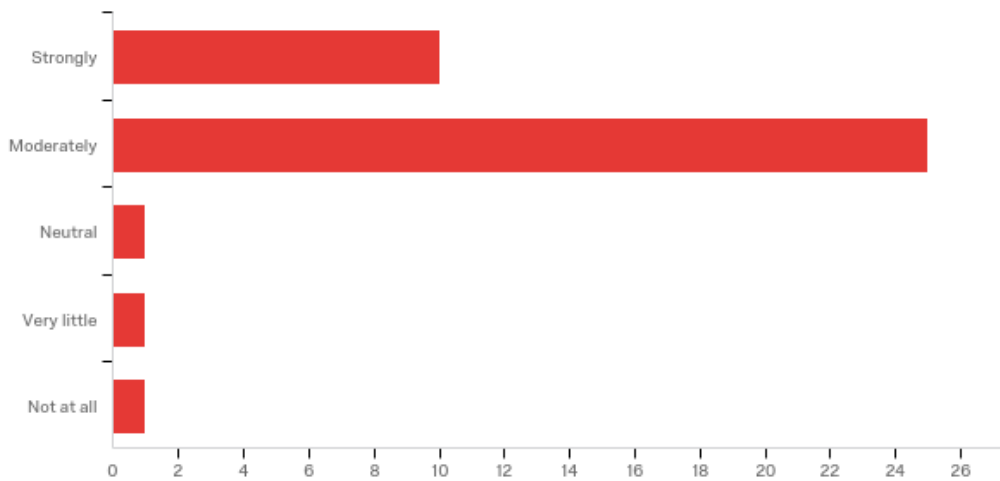


Figure 7: Hotel Survey Q1 Table

#	Answer	%	Count
1	Strongly	26.32%	10
2	Moderately	65.79%	25
3	Neutral	2.63%	1
4	Very little	2.63%	1
5	Not at all	2.63%	1
	Total	100%	38

The majority of hotels are familiar with the issue of sex trafficking, with 92% being moderately or strongly familiar.

Average 4.105
 Standard Deviation 0.788

Q2: To what extent do you recognize sex trafficking as a global issue?

Figure 8: Hotel Survey Q2 Chart

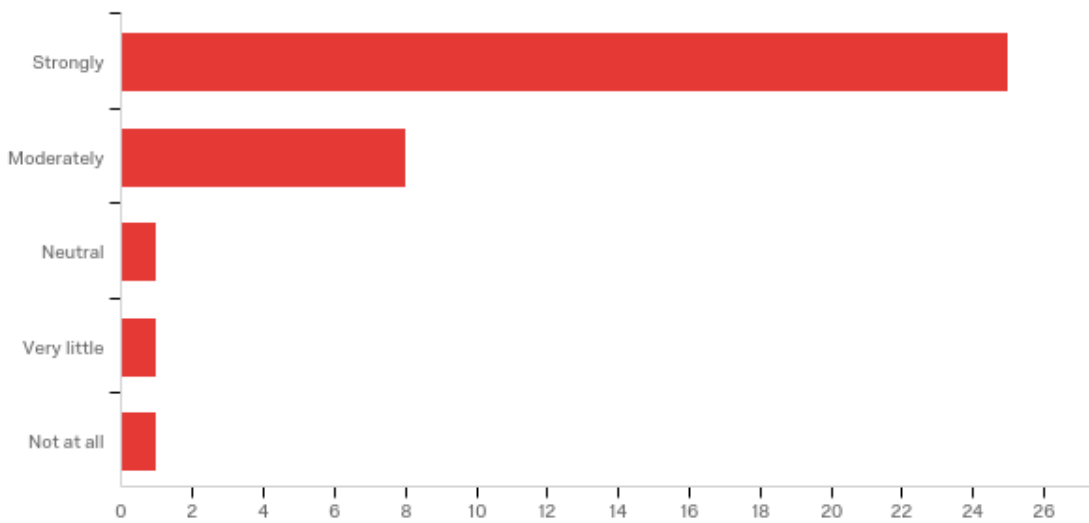


Figure 9: Hotel Survey Q2 Table

#	Answer	%	Count
1	Strongly	69.44%	25
2	Moderately	22.22%	8
3	Neutral	2.78%	1
4	Very little	2.78%	1
5	Not at all	2.78%	1
	Total	100%	36

The vast majority of responders recognize sex trafficking as a global issue, with 69% strongly agreeing with the claim and over 91% moderately or strongly agreeing.

Average 4.528
 Standard Deviation 0.897

Q3: To what extent do you believe sex trafficking is an issue in your area?

Figure 10: Hotel Survey Q3 Chart

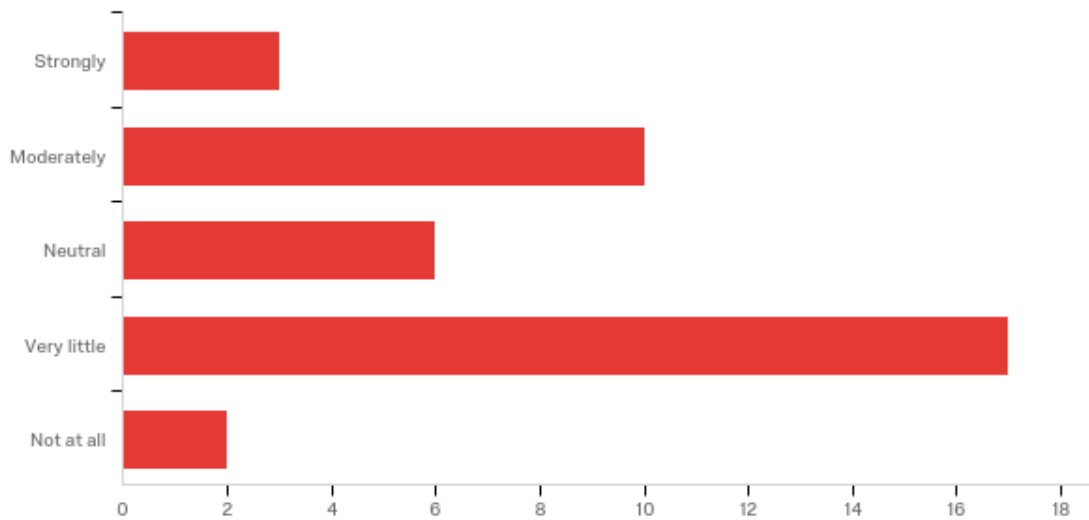


Figure 11: Hotel Survey Q3 Table

#	Answer	%	Count
1	Strongly	7.89%	3
2	Moderately	26.32%	10
3	Neutral	15.79%	6
4	Very little	44.74%	17
5	Not at all	5.26%	2
	Total	100%	38

This question generated a greater distribution in the responses. While the overwhelming majority recognized sex trafficking as a global issue, fewer than 8% strongly agreed that it was an issue in their immediate area and 34% found it to be a problem (moderately or strongly agreeing). Moreover, 50% believed the issue is small or nonexistent. While the mean for the previous question was 4.5, the mean for this question was 2.8, highlighting a strong contrast in how hoteliers view the problem globally versus locally. The perception that sex trafficking is not an issue in their immediate area allows hoteliers to justify ignoring issues that could easily be occurring in their workplace.

Average	2.868
Standard Deviation	1.104

Q4: To what extent are your employees familiar with the issue of sex trafficking?

Figure 12: Hotel Survey Q4 Chart

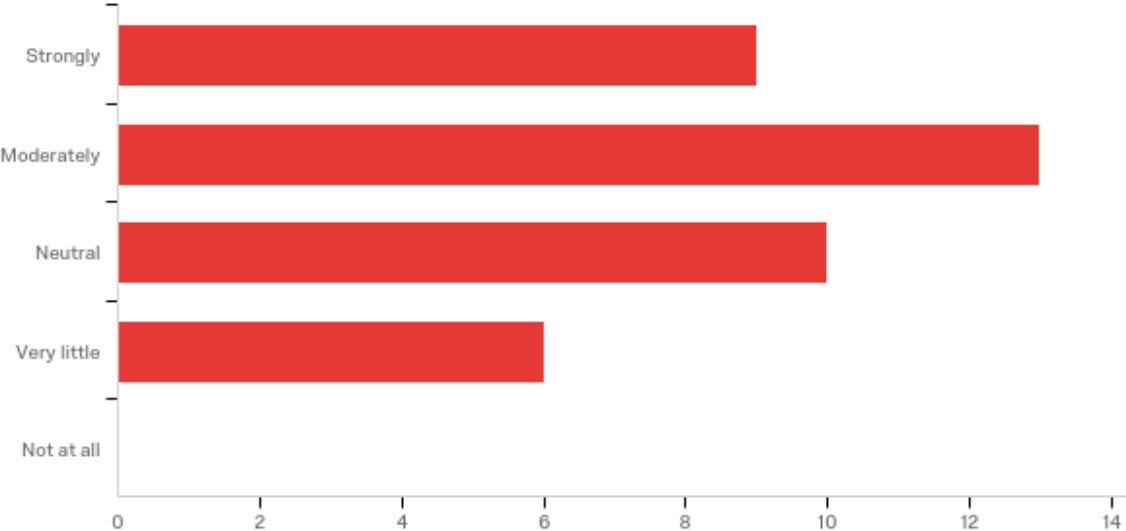


Figure 13: Hotel Survey Q4 Table

#	Answer	%	Count
1	Strongly	23.68%	9
2	Moderately	34.21%	13
3	Neutral	26.32%	10
4	Very little	15.79%	6
5	Not at all	0.00%	0
	Total	100%	38

Average 3.622
 Standard Deviation 0.996

Q5: To what extent do you believe the hospitality industry contributes to the sex trafficking industry?

Figure 14: Hotel Survey Q4 Chart

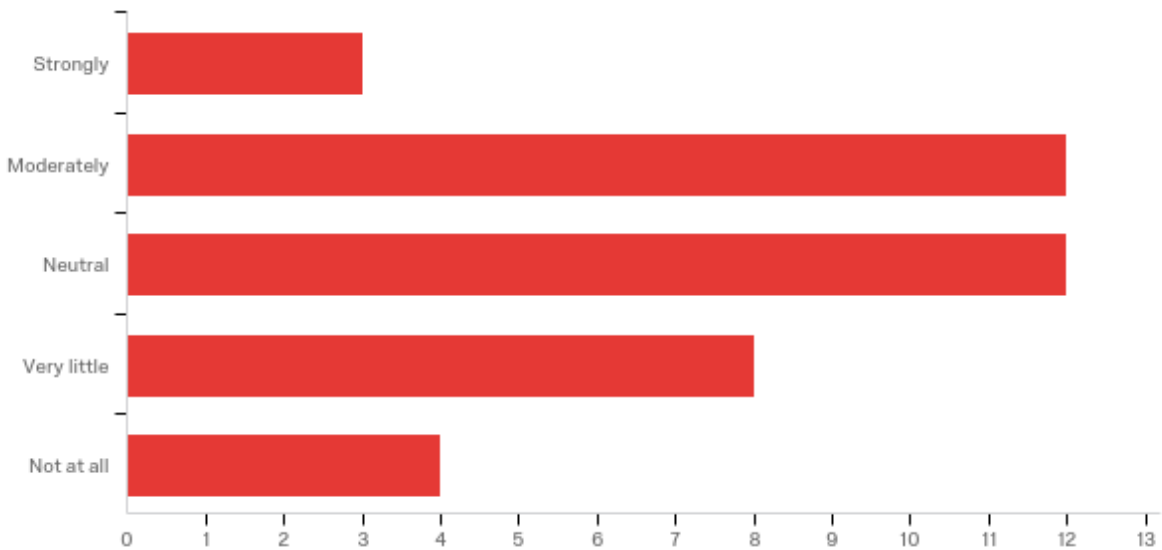


Figure 15: Hotel Survey Q5 Table

#	Answer	%	Count
1	Strongly	7.69%	3
2	Moderately	30.77%	12
3	Neutral	30.77%	12
4	Very little	20.51%	8
5	Not at all	10.26%	4
	Total	100%	39

This question got a great variety in responses, with most responders being either neutral or believing the industry moderately contributes to sex trafficking. Contribution could mean different things to different responders, which could explain the variation in responses.

Average 3.079
Standard Deviation 1.109

Q6: To what extent do you believe the hospitality industry fulfills its responsibility to combat sex trafficking?

Figure 16: Hotel Survey Q6 Chart

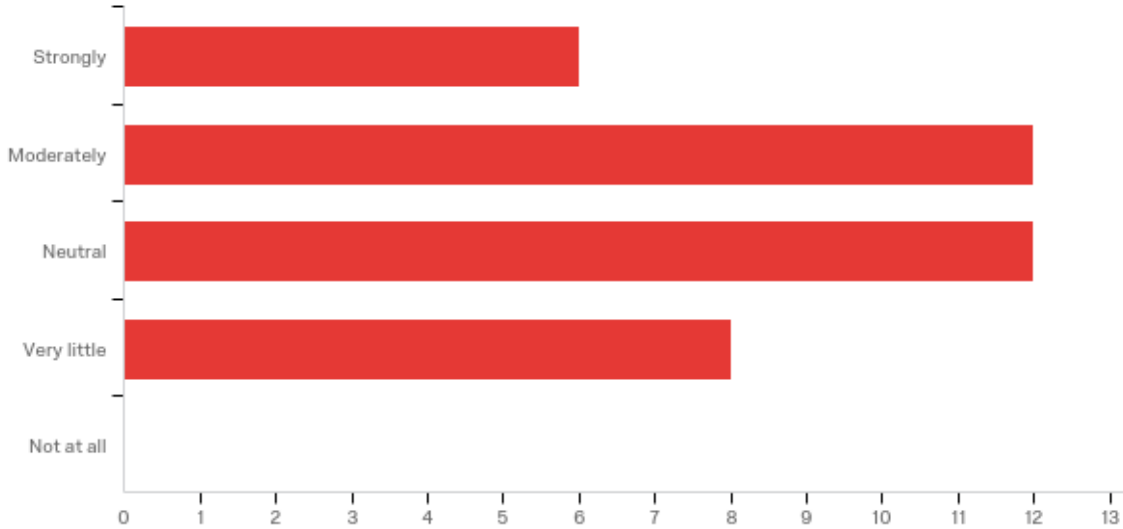


Figure 17: Hotel Survey Q6 Table

#	Answer	%	Count
1	Strongly	15.79%	6
2	Moderately	31.58%	12
3	Neutral	31.58%	12
4	Very little	21.05%	8
5	Not at all	0.00%	0
	Total	100%	38

This question also received great variety in responses, but compared to the previous question, more respondents believed that the extent to which the industry is fulfilling its responsibility against sex trafficking is lacking, though none believed that the industry is being completely negligent. Nonetheless, the possibility of a sample bias can be argued in this

question, as it is likely that those responding to the survey have had some exposure to the issue and potential solutions in the past.

Average 3.421
 Standard Deviation 0.990

Figure 7: To what extent would your company be willing to implement training on how to identify and report potential trafficking?

Figure 18: Hotel Survey Q7 Chart

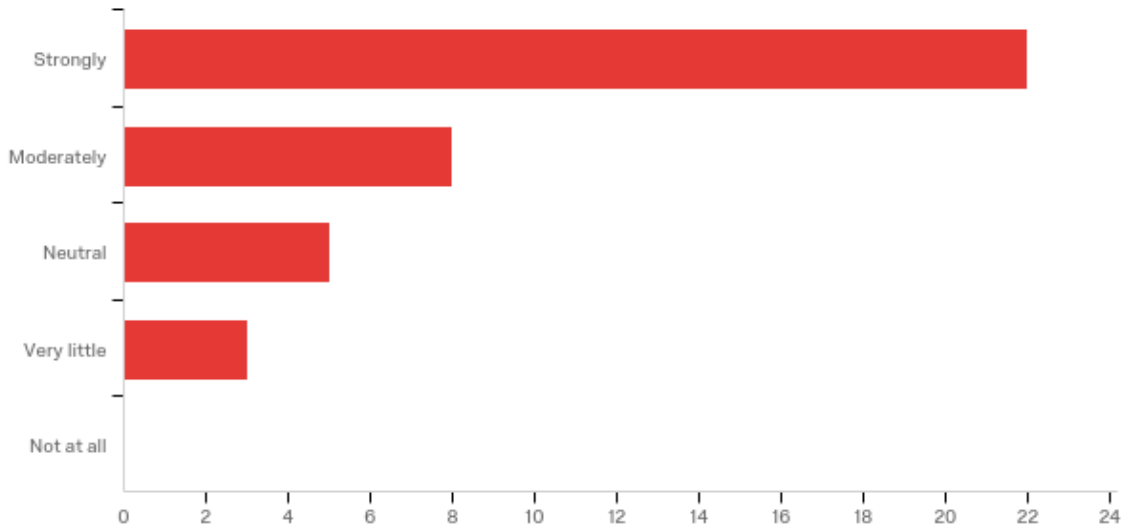


Figure 19: Hotel Survey Q7 Table

#	Answer	%	Count
1	Strongly	57.89%	22
2	Moderately	21.05%	8
3	Neutral	13.16%	5
4	Very little	7.89%	3
5	Not at all	0.00%	0
	Total	100%	38

The majority of hotels are strongly willing to implement training regarding trafficking. The extent to which hotels will actually seek out training is lower, as will become apparent in a future question. Nonetheless, most are not opposed to receiving the training.

Average 4.289
Standard Deviation 0.971

Q8: To what extent would your hotel(s) be willing to ask guests if they are involved with sex trafficking, either on the demand side or the supply side, upon booking or checking in?

Figure 20: Hotel Survey Q8 Chart

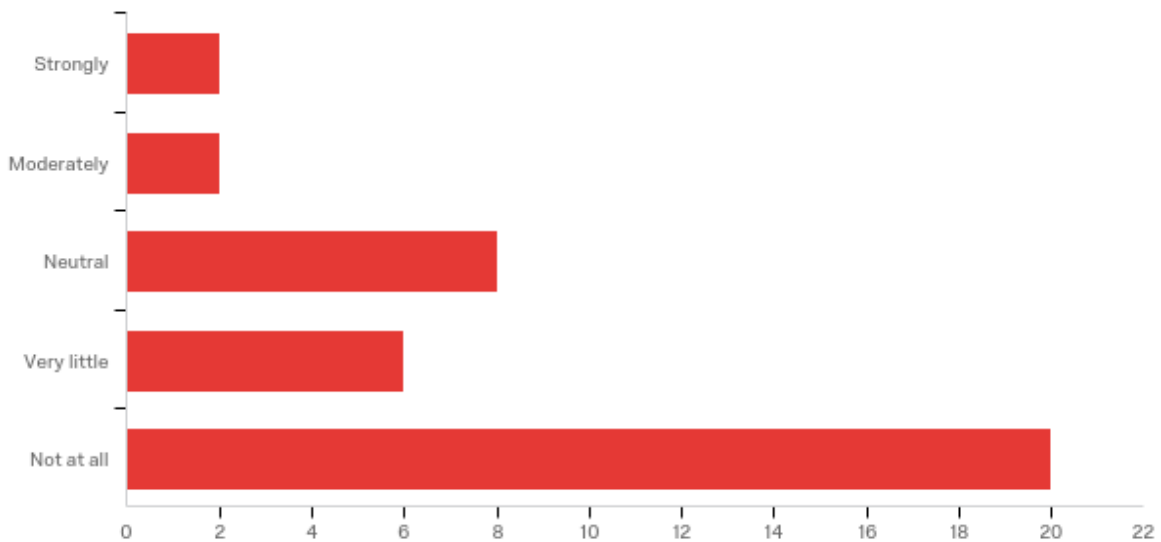


Figure 21: Hotel Survey Q8 Table

#	Answer	%	Count
1	Strongly	5.26%	2
2	Moderately	5.26%	2
3	Neutral	21.05%	8
4	Very little	15.79%	6
5	Not at all	52.63%	20
	Total	100%	38

Hotels are overwhelmingly opposed to asking guests directly about their involvement with sex trafficking, with over half of the respondents being strongly unwilling. With a mean of 1.9, this is the lowest average of the survey, highlighting how strongly hoteliers are opposed to asking such questions. This reaction is understandable as such a question could disrupt a guest's experience and seem irrelevant and potentially offensive to most guests (who are not engaged in any form of trafficking). Therefore, while asking the question could raise awareness on the issue and signal to traffickers that hoteliers are watching, hoteliers are unwilling to disrupt the guest experience to do so.

Average	1.947
Standard Deviation	1.191

Figure 9: To what extent are you willing to involve law enforcement when sex trafficking is suspected?

Figure 22: Hotel Survey Q9 Chart

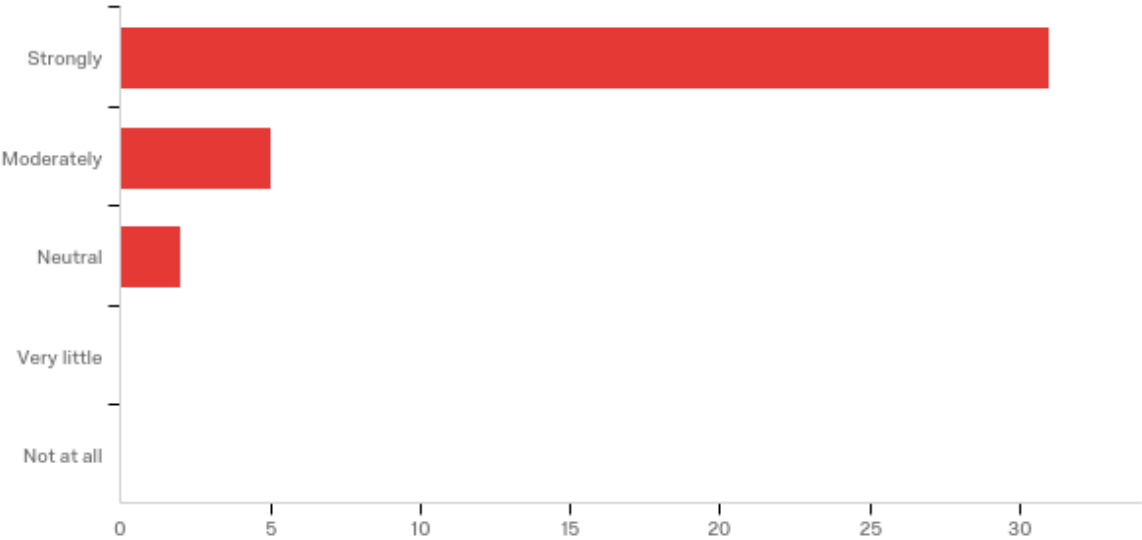


Figure 23: Hotel Survey Q9 Table

#	Answer	%	Count
1	Strongly	81.58%	31
2	Moderately	13.16%	5
3	Neutral	5.26%	2
4	Very little	0.00%	0
5	Not at all	0.00%	0
	Total	100%	38

This question was the most polar in response, with over 80% of respondents being strongly willing to involve law enforcement in case an issue is suspected. With these responses having the highest mean as well as the lowest standard deviation of the survey, we observe that involving law enforcement meets little resistance from hoteliers. This is a good sign, as a hotel

should only report its suspicions to law enforcement as opposed to trying to solve the problem themselves. Law enforcement has the ability to identify the veracity of the suspicions as well as the power and knowledge to take the necessary next steps.

Average	4.763
Standard Deviation	0.535

Q10: To what extent are you willing to involve an NGO when sex trafficking is suspected?

Figure 24: Hotel Survey Q10 Chart

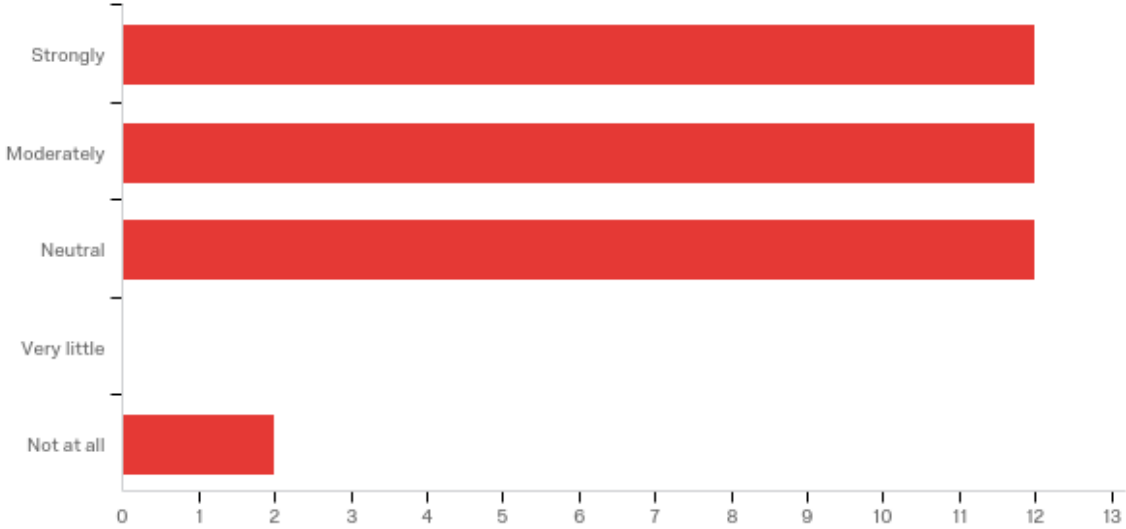


Figure 25: Hotel Survey Q10 Table

#	Answer	%	Count
1	Strongly	31.58%	12
2	Moderately	31.58%	12
3	Neutral	31.58%	12
4	Very little	0.00%	0
5	Not at all	5.26%	2
	Total	100%	38

Respondents felt much less strongly about involving an NGO than involving law enforcement, though most are at least moderately willing to involve NGOs. Since NGOs work more predominantly with prevention and training, they would not necessarily be the first that hoteliers call in the case of a suspicion.

Average 3.842
Standard Deviation 1.039

Q11: To what extent are you willing to provide information to increase awareness of sex trafficking amongst guests and/or employees?

Figure 26: Hotel Survey Q11 Chart

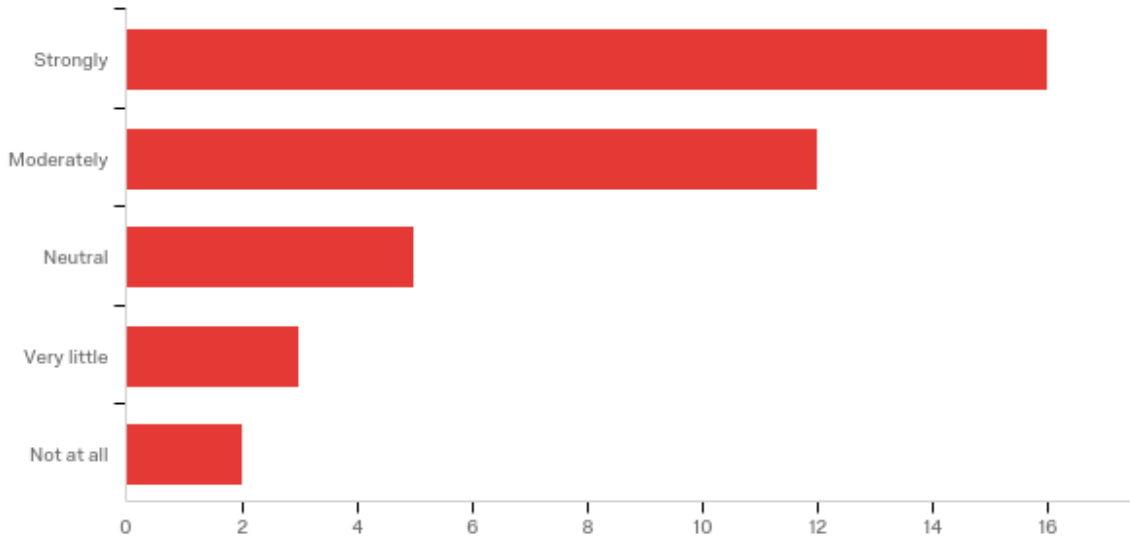


Figure 27: Hotel Survey Q11 Table

#	Answer	%	Count
1	Strongly	42.11%	16
2	Moderately	31.58%	12
3	Neutral	13.16%	5
4	Very little	7.89%	3
5	Not at all	5.26%	2
	Total	100%	38

While most hotels were unwilling to ask guests of their involvement in sex trafficking, most are willing to provide information in order to increase awareness on the issue. This action would be greatly beneficial in fighting sex trafficking, as victims could then potentially find a way out of slavery as a result.

Average 3.974
 Standard Deviation 1.158

Q12: To what extent do you believe the presence of sex trafficking at your hotel(s) could be detrimental to your daily operations?

Figure 28: Hotel Survey Q12 Chart

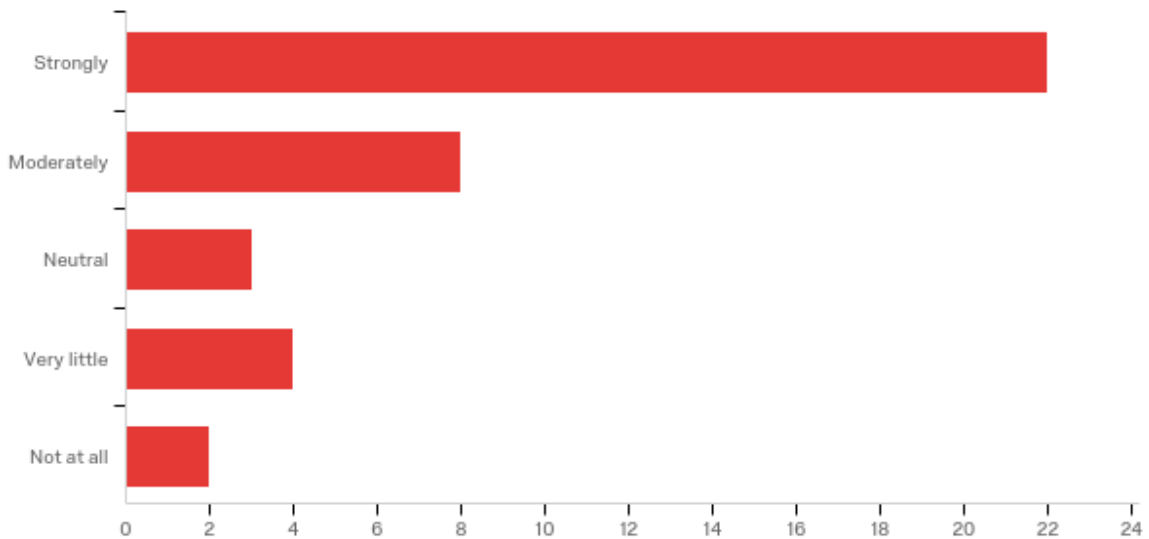


Figure 29: Hotel Survey Q12 Table

#	Answer	%	Count
1	Strongly	56.41%	22
2	Moderately	20.51%	8
3	Neutral	7.69%	3
4	Very little	10.26%	4
5	Not at all	5.13%	2
	Total	100%	39

Once again, the majority of responders believed that sex trafficking could be detrimental to their daily operations, though this response had the highest standard deviation of the survey,

highlighting the strongest variation in response among hotels. Interestingly enough, it is likely that sex trafficking could go unnoticed, which is likely why hotels could believe that operations could go on unharmed. Nonetheless, it puts guests at risks and the hotel at a liability.

Average	4.132
Standard Deviation	1.239

Q13: Does your company participate in The Code? (For more information on The Code visit <http://www.thecode.org/about/>)

Figure 30: Hotel Survey Q13 Chart

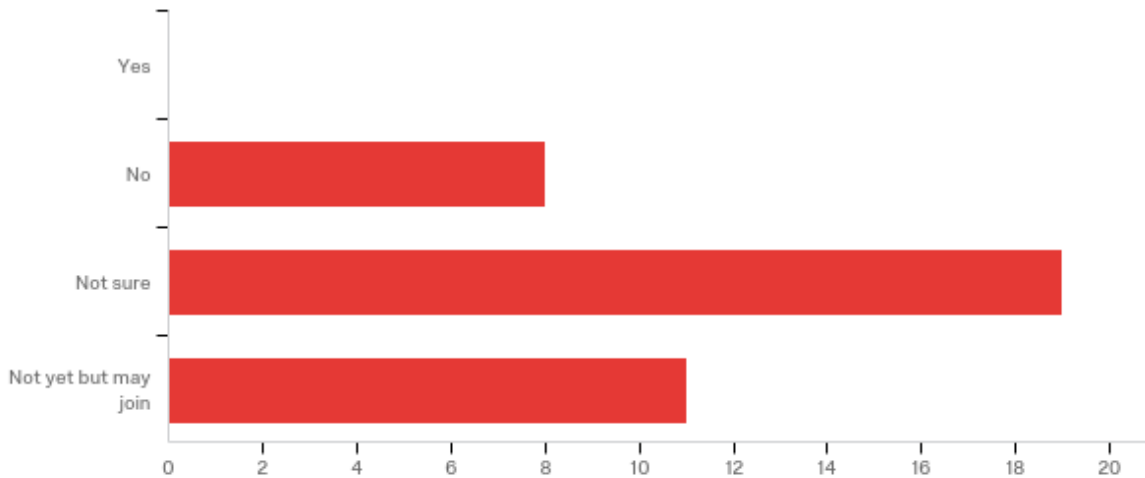


Figure 31: Hotel Survey Q13 Table

#	Answer	%	Count
1	Yes	0.00%	0
2	No	21.05%	8
3	Not sure	50.00%	19
4	Not yet but may join	28.95%	11
	Total	100%	38

While most hotels were willing to implement training surrounding identifying and reporting trafficking, none of the respondents claimed to participate in The Code. Most were unsure of whether they participated in The Code (as the parent company is likely to already be participating), highlighting the huge need for awareness at the property level. Nearly 29% responded that they would consider joining. Nonetheless, the lack of certainty of whether the hotel participates or not shows that the parent companies who do participate are not disseminating the information clearly to their properties.

If you have any additional comments, please feel free to insert them below:

The comments left by respondents had great variety as well.

- Several respondents identified that their parent brand has required training for identifying and reporting sex trafficking (namely Marriott and Carlson were mentioned). However, whether the training was required only for managers or for all employees varied across respondents.
- Some respondents mentioned that if they suspected anything they would/did call the police; several acknowledged the importance and necessity of awareness of the issue. That being said, the bias must be observed since those who responded are naturally more inclined to be aware of the issue and more receptive to training employees.
- The following comment highlighted an unfortunate misconception:

“Sex Trafficking is an issue in flophouses that don't really deserve to qualify as hotels because of the tacit understanding that such behavior will not be reported unless it

becomes an issue causing the police to be called. Any hotel with the proper corporate or individual oversight would quickly identify and report such behavior. The potential exceptions would be large hotels in highly tourist areas where sex trafficking could be misidentified as typical ‘partying’. I don't have experience with hotels of that size but I have to think they'd have staff viewing security footage looking for that, amongst other security concerns.”

- The comment claims that only low quality hotels or highly touristy areas would have an issue with sex trafficking. Though this is far from true, it is commonly believed by the hotel industry. The reality is that sex trafficking happens in any and every community, in hotels of all scales.
- Another comment highlighted what should motivate people to be proactive in solving the issue, wherever they are working: “In the end, people are people in ANY industry.” At the end of the day, the issue should be tackled in whatever capacity possible because people matter.

The full list of comments left by respondents can be found in the appendix.

AGENCIES SURVEY

The answers to the questions below are a summary of all the parties' responses to each question. The full answers for each can be found in the appendix.

Responding parties:

Courtney Walsh - Polaris

Judy Weinstein - Rochester Regional Coalition Against Human Trafficking

Michelle Guelbart – ECPAT

Caitlin Weems - Tompkins County Youth Services Department

Craig Kalkut - AHLA

Q1 - How do you believe the hospitality industry contributes to the sex trafficking industry?

There is no question that traffickers use hotels as a hub for their trafficking. Thus, hotels are inevitably involved; they are used as the site for perpetrating their crime given the degree of anonymity and privacy they provide.

Q2 - Do you believe the hospitality industry fulfills its responsibility to combat sex trafficking?

Though the hospitality industry has made major progress in fulfilling its responsibility, it still has a long way to go. Much of the problem comes from lack of awareness; upon learning

about the issue and how hotels play a role, hotels are generally willing to take steps to combat the problem.

Q3 - What are the top 2-3 things the hospitality industry can do to combat sex trafficking?

Training and awareness are undoubtedly the two most prevalent ways to combat sex trafficking. Training employees and empowering them to take action against the crime could save victims and give them freedom. Similarly, increasing awareness overall could do the same. Raising awareness in the hotel would educate guests on the issue but it would also show victims they can reach out for help and show traffickers that they are being watched.

Q4 - What are ways the hotel industry can mitigate risks of negative publicity surrounding sex trafficking?

By being direct and proactive on the issue, they avoid negative publicity from a case occurring at the hotel. By taking preventative action rather than simply reacting to an issue, hotels can show that they care about a social justice issue. Transparency is appreciated by guests. Partnering with local organizations and legislators also ensures the correct procedures and policies are in place.

Q5 - How can the hospitality industry avoid falsely reporting someone of sex trafficking?

Reporting a suspicion will allow the local police to take appropriate action. Correctly identifying the signs is part of being trained; a properly trained staff is confident in its ability to

identify the red flags. However, the hotel staff is only asked to report, not to handle the issue. Therefore, there's no harm in calling the hotline with suspicions and having trained professionals get to the bottom of the issue; the employees working the hotline would be more trained to identify suspicions that are not legitimate trafficking, thus decreasing the number of false positives.

Q6 - What are the costs (monetary or otherwise) of training employees to identify and report potential trafficking?

The costs will depend on the hotel, both in terms of size and type. The monetary cost of doing training is only the cost of purchasing the training and paying the employees for 30 minutes to be away from work to receive the training. On the other hand, the cost of not training the employees could be very high, both socially and monetarily.

Q7 - How is sex trafficking activity different from other illegal activities that may occur in hotels? (ex. drugs, etc)

Sex trafficking includes a human element that other illegal activities often do not. The crime is treating a person as an object. The human element makes trafficking more difficult to combat. Several intricacies are involved; for a victim who is older than 18 years, coercion needs to be present in order to prosecute as sex trafficking. Moreover, human trafficking can be associated with an independent situation or a large and complex network. That being said, several other illegal activities are often present in conjunction with trafficking and the signs can often be similar.

Q8 - Are there certain hotels or particular locations that attract sex trafficking activity? If so, which ones? What causes it to be this way?

Sex trafficking happens at all types of hotels in all geographical locations. Though some states have higher recorded reports of trafficking, namely (California, Texas, New York, Florida, and Ohio), this may not be an indicator of higher concentration of trafficking but rather higher awareness and/or higher population densities. That being said, no hotel or location is immune to the vulnerability to sex trafficking.

Q9 - What motivates hotels to do something about the problem? Do you recommend anything that could further motivate hotels?

Once hoteliers find out of the issue, they often feel the duty to respond, especially if it directly affects their community; therefore, doing the right thing is often a strong motivator. That being said, recently the demand from customers for hotels that take precaution against trafficking has been increasing, making taking action a strategic business plan. Thus, motivators are often both moral and strategic.

Q10 - Do you see a tendency for owners/operators to believe that the problem is not occurring in their immediate area?

Yes. It's called the "not in my hotel phenomenon". People don't want to know or admit that trafficking could be happening in their area. It stems from lack of awareness, but upon hearing testimonies or finding out about cases of trafficking in their area (which can be done in any area by merely googling of cases), hoteliers quickly realize how prevalent the problem is.

Q11 - Are there any tax incentives associated with acting against sex trafficking?

No tax incentives are currently available.

Q12 - Does any current legislation potentially hold hotels liable for sex trafficking offenses occurring on property?

The TVPA is the act that defines trafficking and is the main law for trafficking in the US. In addition, some states are developing their own laws that could make hotels liable for sex trafficking in their property.

CONCLUSION AND POLICY RECOMMENDATIONS

It is not plausible for hotels to deny the fact that sex trafficking occurs frequently on hotel premises. Though legislation has been soft in prosecuting hotels where trafficking occurred, the liability is very present and the rising trend is for states to begin passing legislature that will hold hotels and its employees more directly responsible.

While hoteliers are very willing to admit that sex trafficking is a global issue, they are less inclined to believe that trafficking is an issue in their immediate community (be it from lack of awareness or from lack of willingness to acknowledge the issue). Moreover, while hoteliers are unwilling to ask guests directly of their involvement in trafficking (which could jeopardize the overall guest experience), they are willing to train employees on signs of trafficking, involve law enforcement and agencies, and provide information to guests in order to increase awareness of trafficking (all which are less invasive methods of combatting trafficking).

The two greatest reoccurring themes in this research has been the need for training and the need for greater awareness. To solve this issue, legislation should be passed nationally to require all hotels to train their employees on how to identify and report suspicions of sex trafficking on the hotel's premises. The training should be from a reputational task force (such as ECPAT or Polaris). This will automatically boost the awareness of all hotel employees as well as create a more difficult environment for traffickers to commit their crime. With such training being required, hotels will not be able to plead ignorance to any instances of trafficking in the hotel, as they would have been reasonably required to know the common identifiers of trafficking. Additionally, hotels should be required to make the National Human Trafficking Hotline phone number available throughout the hotel, be it through posters or small quarter cards

in each hotel room. These cards would ease the process of victims to seek help, showing them that there is a way out of their situation. It would also signal to traffickers that the hotel is on guard, decreasing their ability and willingness to perform trafficking at that hotel. While one could argue that traffickers could avoid a specific hotel, they can't avoid all hotels.

In New York a petition has already been set in motion to mandate hotels to post clearly visible signs explaining what sex trafficking can look like and that they train their employees on how to recognize victims and signs of trafficking. The petition has more than 54,000 signatures. This bill mirrors an existing law in Connecticut that was passed in 2016 requiring hotels to become more engaged in fighting sex trafficking by training employees to spot victims and common trafficking activity. Though the process is early, the outlook for the bill becoming a law is positive.⁸

With these initiatives becoming nationwide requirements, traffickers would encounter significantly greater barriers to committing the crime, awareness would be raised among the employees and guests, and more victims find their way to freedom.

⁸ Bosseta (2017)

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Appendix I: Full comments left by hotel survey respondents:

1	Marriott international has mandatory sex trafficking training for all employees at every level, Many other hotel companies are very involved as well.
2	We are under Carlson Brand Hotels, which has put a program in place. Here's an article about it: http://www.usglc.org/2014/03/08/this-hotel-is-fighting-human-trafficking-like-peoples-lives-are-depending-on-it/ I can't wait to read your thesis! Good luck!
3	Happened one time at my hotel the police was called.
4	Marriott already has mandatory training for managers and will be requiring the same training for all associates by end of second quarter 2017.
5	<p>This quiz is difficult for me because you ask if the "hotel industry" contributes or prevents. However this depends completely on the management of the individual hotel. While one hotel may train its staff to care, and to report suspicious behavior to the management, and if warranted to the appropriate authorities, another hotel's management may not care to be attentive at all. As an industry, so much is dependent upon the individuals actually working at each location. You might as well ask if wal-mart believes their employees have a problem with theft. One well managed store may say absolutely not, because they have a great team. Another may not trust any of their employees and have a high turn-over rate. Do I believe sex trafficking is a problem? Yes. Do I believe SOME hotels, don't care who or why checks in as long as they pay for the room? Yes. Do I believe MY hotel cares and reports to the authorities if we notice patterns or suspect something strange is going on, and attempts to help prevent issues like this in our area? Absolutely. We have training programs from Choice Hotels that are part of the standard training I put all of our staff through, and I encourage new staff to call me any time</p>

something feels "off" so that we as a team can pay attention to any of the signals that may mean we need to contact the police. In the end, people are people in ANY industry. Some people will care and try to help others, other people are only out for their own gain. This is a PEOPLE problem, and not an industry problem. Do gas stations contribute since they don't stop everyone filling up with gas and ask them where they are going and what their business is? Do pre-paid cell phone services contribute since you can purchase a new phone and toss the old making you less "traceable?" There are many tools out there that can be used for good or evil, all depending on the individual utilizing them.

5 I do not believe Hotels contribute to the sex trafficking. I agree that hotels might be used by unscrupulous people who might be involved in this trade. Education in noticing the issue would definitely help in solving this issue partially.

6 Sex Trafficking is an issue in flophouses that don't really deserve to qualify as hotels because of the tacit understanding that such behavior will not be reported unless it becomes an issue causing the police to be called. Any hotel with the proper corporate or individual oversight would quickly identify and report such behavior. The potential exceptions would be large hotels in highly tourist areas where sex trafficking could be misidentified as typical "partying". I don't have experience with hotels of that size but I have to think they'd have staff viewing security footage looking for that, amongst other security concerns.

7 If I suspect something is happening I would certainly call someone but I'm not willing to ask guests if they are involved. I'm willing to give information to my employees but not guests because they want to get away. My concern, having been in field of teaching, is an excess of advertising gives people more of an idea of things to try.

- 8 | Our front desk agents have been trained to recognize and act.
-
- 9 | Good luck with your thesis. Our property is outside Yellowstone. It's doubtful traffickers are coming through here, but remain vigilant. Thank you.
-
- 10 | Recently changed companies, so my knowledge of this issue in my current position is limited. However, I worked for Kewadin Casino and Hotel for over 20 years. This property is part of the Mackinac Island market. The ferries to go to the island are located in this community. Mackinac Island has been rumored to have a high number of trafficking cases reported during the summer months. I think it's important for lodging owners and staff have training available to recognize signs of trafficking, and information for where and how to report.
-
- 11 | If I suspected anything I would call the local Sheriff Department.
-
- 12 | We are corporate owned and mandated on policies we have in place. We do receive training from our Risk Dept.

Appendix II: Full responses of agency survey respondents:

Responding parties:

Courtney Walsh - Polaris

Judy Weinstein - Rochester Regional Coalition Against Human Trafficking

Michelle Guelbart – ECPAT

Caitlin Weems - Tompkins County Youth Services Department

Craig Kalkut - AHLA

Q1 - How do you believe the hospitality industry contributes to the sex trafficking industry?

Courtney Walsh	Hotels are a top venue for trafficking. Polaris has second largest data set on trafficking (after the International Organization of Migration) and hotels are always one of the top three venues used. They are a relatively private hidden venue, where it's safe for dates to take place and traffickers use this venue for a reason. There they can perpetuate trafficking in an accessible easy way while it's still secure and safe for them.
Judy Weinstein	While there are some hotels/motels that permit sex trafficking, I think the vast majority are unaware of the red flags, and therefore have not trained their staff, nor do they know what to do if they see something suspicious.

Michelle Guelbart	Sex traffickers are using hotels to run their business or engage in exploitation; the hospitality industry doesn't necessarily contribute to the industry but is inevitably involved.
Caitlin Weems	Often it will serve as a hub for exploiters to work out of. It becomes more anonymous than a house or apartment that can be traced back to them. Very few questions are asked of them, because hospitality workers are used to people coming and going, due to the nature of the hospitality industry.
Craig Kalkut	We unfortunately know that sex traffickers in networks often use hotels and the hotel site for perpetrating their crime. There is plenty of evidence of that, we can't deny it. We work to do what we can to combat it.

Q2 - Do you believe the hospitality industry fulfills its responsibility to combat sex trafficking?

Courtney Walsh	It's starting to fulfill it. Up until now it's been a voluntary movement (and continues to be one) for hotels to sign on the code or to work with Polaris, incentivizing franchisees, putting up posters for employees to take active role, etc. More chains are taking action, so it's an exciting time.
Judy Weinstein	No

Michelle Guelbart	<p>Oh geez. ECPAT-USA has worked since 2005 and there been MAJOR progress on the fight against sex trafficking in the industry, so there has been major progress but there's still a lot of work to do. Hotels on the ground level need to receive the training available; they just don't know it's there. Property level hotel people in the front line don't know it's a problem; when they do know about the problem they want to do something.</p>
Caitlin Weems	<p>No, I think many are not aware that they have a responsibility to be aware of sex trafficking, let alone combat the issue. There are exceptions to the rules, but I feel the overwhelming majority operate under a "don't ask, don't tell" point of view.</p>
Craig Kalkut	<p>In my experience hotel companies have been eager to fulfill their responsibility; it's not something they shy away from. You can see it in actions by some trade associations but also some companies and state level hotel associations. They're taking steps to combat the problem. I've been working in the hospitality industry for three years and since I started it's always been a priority of the industry. I'm very impressed at how seriously they took it. It's never difficult from an associations standpoint.</p>

Q4 - What are the top 2-3 things the hospitality industry can do to combat sex trafficking?

Courtney Walsh	Training definitely. Customer based engagement is also important; for instance, a world where we have hotline number on TV screens and key cards and brochures in rooms so the average customer can be educated and potential victims know where to reach out for help. In tandem with training is awareness raising and continuous improvement with employees. Having pocket sized cards with indicators for employees can carry with them and have it as a refresher at all times would be highly beneficial.
Judy Weinstein	Have a corporate policy against trafficking and make it a priority. Train employees. Support employees who report suspicions.
Michelle Guelbart	Talking about the issue gets people more involved. Training, raising awareness from an organizational perspective helps companies comprehensively address the issue. Signing the code, which is 6 guidelines, and following them is a comprehensive approach to the issue.
Caitlin Weems	Educate staff on the topic of sex trafficking. Train them to recognize when a questionable situation is occurring. Empower them to take action (they shouldn't be afraid of repercussions from their employer should they make a report to local law enforcement).

Craig Kalkut	<p>1) Raising awareness of the issue. I didn't know it was an issue at hotels until I started working in the industry. AHLA takes the opportunity to make companies and employees aware of how big an issue it is; with 24,000 members, we get to speak at many places about the issue and have great reach.</p> <p>2) Training employees, giving them information about trafficking, and telling them what to look for. AHLA developed a training course with ECPAT and Polaris for hotel employees, teaching them signs and behaviors to look for. It doesn't take long, only about 30 mins and it gives you basic tell-tale signs. The important messages is you don't have to be intimidated, just call law enforcement; they're not told to step in themselves. We push it out to members and properties as much as can. In fact, Connecticut is now requiring hotel employees to be trained.</p>
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Q5 - What are ways the hotel industry can mitigate risks of negative publicity surrounding sex trafficking?

Courtney Walsh	<p>It's always a risk. Hotels don't want to be seen as a venue for trafficking. Sex trafficking is so alive so it's important to stay ahead and be out in front of the phenomenon. Hotels can be direct in engagement when comes it to marketing and being a pioneer because the issue isn't going away and better it's to have pre-existing program. Once a few major hotel chains care, it really becomes about not being left behind.</p>
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Judy Weinstein	<p>By being responsible, signing ECPAT pledge, having signs on front desk saying they work against trafficking.</p>
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Michelle Guelbart	<p>1) Frame it as preventative.</p> <p>2) Get in touch with local organizations or national organizations working on the issue.</p> <p>3) Engage with legislators. They can help manage the message.</p> <p>4) Be as transparent as possible. People respect it and do a lot of research; when hotel is transparent. then people know it's authentic and will believe it and will want to support the business.</p>
Caitlin Weems	<p>By being proactive in combating sex trafficking. Negative publicity comes from sex trafficking occurring in their establishment. When it occurs, people look at the hotel and wonder why staff didn't know, didn't do something to stop it.</p> <p>Trained staff engaging in bystander intervention can reverse this point of view. Instead of seeing the establishment as enabling the behavior, it can be seen as a player in stopping sex trafficking and exploitation. It's all about doing their part to protect other people, for the simple reason that they are human beings and not objects.</p>
Craig Kalkut	<p>Most hotels see it as better to be knowledgeable and be on the lookout. Be a part of solution and tell law enforcement than rather than have them come in from outside with a raid. It's better to partner and nip it in the bud. Mitigate the problem because it's the right thing and because it could be bad publicity.</p>

Q6 - How can the hospitality industry avoid falsely reporting someone of sex trafficking?

Courtney Walsh	Always call the hotline because those are people fully dedicated and trained to do a trafficking assessment. Employees can use it to ask questions and get to the bottom of the issue. No harm will come in calling the hotline. Much rather have call with suspicions than to allow a potential perpetrator to escape.
Judy Weinstein	Undoubtedly there will be some reports that don't pan out (I wouldn't call that false), just as there reports of other crimes that are either inaccurate or can't be prosecuted.
Michelle Guelbart	Easy! I always tell people working in hospitality to ensure there is training and programs WAY before actually working on addressing issue. Having systems in place to report suspicions to higher up management and having checks and balances to make sure it's actually a case of trafficking. Be in touch with local law enforcement and they can be the last check. they will have protocol to respond in a way that fits circumstance.
Caitlin Weems	This goes back to being trained on what sex trafficking looks like and what are the signs/red flags that are sometimes displayed by those being exploited. Trained staff will feel more confident looking at a situation and correctly identifying it. In my opinion, it is better to make an anonymous report that gets checkout and turns out to be nothing, rather than to not make a report and something awful happen to another person.

Craig	It's part of training. You tell law enforcement and employees are done with their part because law enforcement makes the decision. It's not the employees' responsibility.
Kalkut	

Q7 - What are the costs (monetary or otherwise) of training employees to identify and report potential trafficking?

Courtney Walsh	Depends on the hotel, so it's hard to answer. A large hotel chain with thousands of locations will have very different costs than a mom and pop shop.
Judy Weinstein	The flip side is what is the cost of not doing so? NYS Assemblymember Paulin has introduced a bill requiring training.
Michelle Guelbart	Hotel brands have training module available for free to franchisees; the cost is simply being 30 minutes away from work and that's about it. It's actually a money saver if it helps mitigate a case.
Caitlin Weems	This will vary depending on who is doing the training, and where it is happening. Staff may be asked to attend an off site training, which results in time being taken off of work for both the training and the travel to the training. Or staff could be trained on site, which still results in them taking time off work. Sometimes the training will cost money, or sometimes it is free. Both of these options require the trainer to prep and then facilitate, which is costly in terms of time. All of this really doesn't compare to the negative impact on people and resources should sex trafficking occur in their establishment.
Craig Kalkut	The cost of training varies per hotel size, but it's definitely not burdensome.

Q9 - How is sex trafficking activity different from other illegal activities that may occurs in hotels? (ex. drugs, etc)

Courtney Walsh	There's a human victim element that may not be present in others illegal activities. Also, trafficking can be an independent trafficking situation and not part of a larger ring, so it can be solo or a complex network, which makes it harder to identify.
Judy Weinstein	Many of the signs are probably the same - people hanging around, trying to avoid cameras, a lot of traffic into some rooms - but some are most likely specific to sex trafficking, particularly commercial sexual exploitation of children - has few or no personal possessions, is not in control of his/her own money or identification documents (ID or passport), is not allowed or able to speak for himself/herself (a third party may insist on being present and/or translating); Patron appears with a minor that he did not come with originally.

Michelle Guelbart	Sex trafficking is actually associated with other crimes, so it could be that the perpetrator is involved in more than just sex trafficking; drugs and guns are also often involved. But the difference is that there's a person involved in these issues. That person's life can be changed by someone reporting something. At the same time when law enforcement is working on it, they have to take person's perspective and experience when prosecuting a the crime. You don't have to ask a drug - have to ask victim over 18 of their experience and you have to confirm coercion was present. It makes it difficult to prosecute, so prosecutors are being trained to handle the challenges. That being said, a person under 18 doesn't have to be asked, they are by definition too young to provide consent.
Caitlin Weems	Sex trafficking is continual exploitation of another human being for personal gain. It's treating a person as if they were an object and having no regard for their mental, emotional, and physical well-being.
Craig Kalkut	Nothing distinct comes to mind. Hotels want to avoid all illegal activity. Trafficking has a particular connection to hotels where as there is no disproportionate connection to drug trafficking.

Q10 - Are there certain hotels or particular locations that attract sex trafficking activity? If so, which ones? What causes it to be this way?

Courtney Walsh	According to our data, California, Texas, New York, Florida, and Ohio have the top numbers but this mainly due to population and concentration of hotels. We see it happening in nice hotels, cheap hotels, independent or chain hotels. It happens all across the board. It will be interesting to see how trafficking changes with it the new sharing economy.
Judy Weinstein	-
Michelle Guelbart	There aren't particular hotels or locations, it's just that if there's a demand it will be filled. So basically anything that increases the demand (such as anonymity) will increase the instances because traffickers run their business well. When trafficker knows it isn't safe for them to do it, they won't do it, so training and reporting prevent them from doing it. Higher numbers in a particular area may come from the higher awareness of an area, not necessarily greater instances in that area.
Caitlin Weems	I don't have this information.
Craig Kalkut	Everything indicates happens at all types of hotels at all levels, not just cheaper hotels. It happens across the spectrum. Geographically I have no direct knowledge.

Q11 - What motivates hotels to do something about the problem? Do you recommend anything that could further motivate hotels?

Courtney Walsh	<p>Consumers are starting to care more across the board about the product and clean supply chains with healthy, sustainable, violence and cruelty free products. There's a consumer component to it. Some hotel chains will make it a priority and will spend a lot of time on it out of the goodness of their hearts, but it's also strategic in fighting human rights issue. Humans are part of the supply chain.</p>
Judy Weinstein	<p>Having customers ask about their policies. Regulations requiring training.</p>
Michelle Guelbart	<p>It has changed over the years. Once someone knows, they want to do something. It's a human issue and no one wants to have this affecting children in our country. People running hotels care about community; a lot of victims are kids who live in their own communities. There's a lot of liability if something happens; they don't want the property associated with this disturbing issue. They also don't want to be sued. It's really all about awareness and getting the word out, while not overexaggerating the issue in going way over the top in over blaming.</p>
Caitlin Weems	<p>I want to say that they should be motivated on the sole reason of protecting human life, but that doesn't always motivate everyone. Avoiding negative publicity is always a good motivator.</p>

Craig Kalkut	Both business and moral motivators come into play. They have a responsibility and it's good for business. The dominant factor is that it's a terrible and there's a need to take action; that motivates people more than anything.
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Q12 - Do you see a tendency for owners/operators to believe that the problem is not occurring in their immediate area?

Courtney Walsh	People don't want to know and don't want to admit the trafficking is happening in their backyard. So yes.
Judy Weinstein	-
Michelle Guelbart	Yes. It's biggest problem. It's called the "not in my hotel" phenomenon. When they see stories or hear survivors talking, that's what changes their mind. There are articles about every city now so I tell people to google city where live and sex trafficking and they will find a case in their area . I once had a guy email me who didn't believe me but found two cases his area.
Caitlin Weems	There is always a tendency for people to think "that doesn't happen here". This is where education comes into play. You really have to build awareness and understanding before you can proceed with combating the issue. I think there are probably owners/operators who are unaware of the problem, and those that are aware but don't think it's happening in their establishment.
Craig Kalkut	Some people are surprised to find out its happening so much in their area. It's part of an awareness issue.

Q13 - Are there any tax incentives associated with acting against sex trafficking?

Courtney Walsh	No, none I'm aware of.
Judy Weinstein	-
Michelle Guelbart	Not yet. Don't think there ever will be.
Caitlin Weems	I don't have information on this. My guess would be no, not at this time. That would be an interesting concept though.
Craig Kalkut	Not heard about any.

Q14 - Does any current legislation potentially hold hotels liable for sex trafficking offenses occurring on property?

Courtney Walsh	I'm personally not aware of any legislation.
Judy Weinstein	A human trafficking victim in Philadelphia recently sued the motel where she was trafficked.
Michelle Guelbart	There are 4 cases of people suing hotels. I don't know if they are criminal or civil. The federal law is a piece of legislation that a victim could use to find hotel liable though it hasn't happened yet. The Trafficking Victims Protection Act defines trafficking nationally and it can be used.

Caitlin Weems | I don't have information on this, but I want to say that I have heard about something like this being proposed. It would definitely change the way those establishments are run.

Craig Kalkut | There was a recent case in Pennsylvania seeking to hold the hotel liable.

Appendix II: Additional Legislation Surrounding Human Trafficking:

These summaries were taken directly from Polaris Project's summary of current laws.

The Tariff Act of 1930: The Tariff Act of 1930 prohibits importing goods made with forced or indentured labor.

The Customs and Facilitations and Trade Enforcement Act (2009): The Customs and Facilitations and Trade Enforcement Act amended the prohibition on importing goods made with slave or indentured labor to include goods made through the use of coercion or goods made by victims of human trafficking.

The Racketeering Influenced Corrupt Organizations Act (RICO): RICO was created to be a tool for the federal government to more effectively prosecute members of organized crime for racketeering offenses. Federal human trafficking offenses are included as racketeering offenses, thus giving law enforcement a powerful tool when prosecuting traffickers.

The Mann Act: The Mann Act of 1910, (18 U.S.C. § 2421-2424) as amended in 1978 and again in 1986, criminalizes the transportation of minors, and the coercion of adults to travel across state lines or to foreign countries, for the purposes of engaging commercial sex. Both crimes are punishable with up to twenty years in prison, with enhanced punishment options for the transportation of a minor.

The PROTECT Act: The Prosecutorial Remedies and Other Tools to End the Exploitation of Children Today (PROTECT) Act of 2003, established enhanced penalties for individuals engaging in sex tourism with children, both within the United States and in other countries; The Amber Alert System and other methods of alerting the public to missing,

exploited, and abducted children; and grants for transitional housing for child victims of sexual assault.

National Defense Authorization Act of 2013: Sections 1701-1708 of the National Defense Authorization Act seeks to limit human trafficking associated with government contractors. These sections give governmental agencies the ability to terminate, without penalty, any contract or grant with any organization or individual that engages in human trafficking. It also requires that all grants and contracts worth more than \$500,000, have a written certification that no party in the transaction will engage in or support human trafficking practices. It also establishes methods of reporting and investigating possible instances of human trafficking associated with government contracts and grants.



What is Human Trafficking?

Human trafficking is modern-day slavery and involves the use of force, fraud or coercion to obtain labor or commercial sex. Every year, millions of men, women and children are trafficked in countries around the world, including the United States.

There are different types of human trafficking:

- **Sex Trafficking**
Victims of sex trafficking are manipulated or forced to engage in sex acts for someone else's commercial gain. Sex trafficking is not prostitution.
Anyone under the age of 18 engaging in commercial sex is considered to be a victim of human trafficking. **No exceptions.**
- **Forced Labor**
Victims of forced labor are compelled to work for little or no pay, often manufacturing or growing the products we use and consume every day.
- **Domestic Servitude**
Victims of domestic servitude are forced to work in isolation and are hidden in plain sight as nannies, housekeepers or domestic help.

<p>Human trafficking and the hospitality industry</p> <p>Traffickers often take advantage of the privacy and anonymity offered by the hospitality industry. They can operate discreetly because staff and guests may not know the signs of human trafficking.</p> <p>You may have employees who are victims of forced labor. If a third party applied for a position on behalf of an individual or if employees are not receiving their own paychecks, these could be signs of human trafficking.</p> <p>Hotels and motels are also major locations where traffickers force sex trafficking victims to provide commercial sex to paying customers. Victims may be forced to stay at a hotel or motel where customers come to them, or they are required to go to rooms rented out by the customers.</p>	<p>What actions can I take at my business to help stop human trafficking?</p> <p>You play a significant role in helping to stop this terrible crime by:</p> <ul style="list-style-type: none">• Knowing the signs of human trafficking.• Designing a plan of action to respond to reports of human trafficking in your business.• Partnering with agencies that provide services to victims of human trafficking. In the case of lodging, consider offering vouchers to victims. Immediate housing for victims plays a vital role in beginning a victim's healing process.• Providing employee training to help them understand and identify signs of human trafficking.• Distributing and posting the fact sheets in this kit to your employees.
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SIGNS OF HUMAN TRAFFICKING

For **Hotel** and **Motel** Staff






Hotel and motel employees are often in the best position to see potential signs of human trafficking, especially since your duties give you access to different areas of the properties. You may also have direct or indirect contact with both traffickers and victims.

GENERAL INDICATORS

- Individuals show signs of fear, anxiety, tension, submission, and/or nervousness.
- Individuals show signs of physical abuse, restraint, and/or confinement.
- Individuals exhibit evidence of verbal threats, emotional abuse, and/or being treated in a demeaning way.
- Individuals show signs of malnourishment, poor hygiene, fatigue, sleep deprivation, untreated illness, injuries, and/or unusual behavior.
- Individuals lack freedom of movement or are constantly monitored.
- Individuals avoid eye contact and interaction with others.
- Individuals have no control over or possession of money or ID.
- Individuals dress inappropriately for their age or have lower quality clothing compared to others in their party.
- Individuals have few or no personal items—such as no luggage or other bags.
- Individuals appear to be with a significantly older “boyfriend” or in the company of older males.
- A group of girls appears to be traveling with an older female or male.
- A group of males or females with identical tattoos in similar locations. This may indicate “branding” by a trafficker.

Each indicator alone may not necessarily mean a person is being trafficked.

WHAT TO DO IF YOU SUSPECT HUMAN TRAFFICKING

-  Do not at any time attempt to confront a suspected trafficker directly or alert a victim to your suspicions.
-  Call 9-1-1 for emergency situations—threats of violence, physical assault, emergency medical needs, etc.
-  Follow your corporate protocol, such as by notifying management and security.
-  Call 1-866-DHS-2-ICE (1-866-347-2423) to report suspicious criminal activity to federal law enforcement. Highly trained specialists take reports from both the public and law enforcement agencies. Submit a tip at www.ice.gov/tips.
-  To get help from the National Human Trafficking Resource Center (NHTRC), call 1-888-373-7888 or text HELP or INFO to BeFree (233733).



SIGNS OF HUMAN TRAFFICKING

For Concierge, Bellman, Front Desk, Security, and Valet Staff

Concierge, bellman, front desk, security, and valet staff are typically the first to see guests when they enter the hotel. When checking in or requesting hotel amenities, a guest may exhibit behavior indicating human trafficking.

GENERAL INDICATORS

- Patrons checking into room appear distressed or injured.
- The same person reserving multiple rooms.
- Few or no personal items when checking in.
- Room paid for with cash or pre-loaded credit card.
- Excessive use of hotel computers for adult oriented or sexually explicit websites.
- Patrons not forthcoming about full names, home address or vehicle information when registering.
- Minor taking on adult roles or behaving older than actual age (paying bills, requesting services).
- Patron appears with a minor that he or she did not come with originally.
- Rentals of pornography when children are staying in the room.
- Individuals dropped off at the hotel or visit repeatedly over a period of time.
- Individuals leaving room infrequently, not at all, or at odd hours.
- Minor with a patron late night or during school hours (and not on vacation).
- Individuals checking into room have no identification.
- Room is rented hourly, less than a day, or for long-term stay that does not appear normal.
- Patrons request information or access to adult services or sex industry.
- Room rented has fewer beds than patrons.
- Individuals selling items to or begging from patrons or staff.
- Individuals enter/exit through the side or rear entrances, instead of the lobby.
- Car in parking lot regularly parked backward, so the license plate is not visible.

Each indicator alone may not necessarily mean a person is being trafficked.

WHAT TO DO IF YOU SUSPECT HUMAN TRAFFICKING

- ⊗ Do not at any time attempt to confront a suspected trafficker directly or alert a victim to your suspicions.
- ! Call 9-1-1 for emergency situations—threats of violence, physical assault, emergency medical needs, etc.
- 🗨️ Follow your corporate protocol, such as by notifying management and security.
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SIGNS OF HUMAN TRAFFICKING

For Housekeeping, Maintenance, and Room Service Staff

Housekeeping, maintenance, and room service staff typically have the most access to guest rooms where signs of human trafficking may be apparent. By being conscious of human trafficking indicators, you can help identify possible human trafficking activities and victims.

GENERAL INDICATORS

- “Do Not Disturb” sign used constantly.
- Requests room or housekeeping services (additional towels, new linens, etc.), but denies hotel/motel staff entry into room.
- Refusal of cleaning services for multiple days.
- Excessive amounts of cash in a room.
- Smell of bodily fluids and musk.
- Presence of multiple computers, cell phones, pagers, credit card swipes, or other technology.
- The same person reserving multiple rooms.
- Individuals leaving room infrequently, not at all, or at odd hours.
- Children’s items or clothing are present but no child registered with the room.
- Individuals loitering in hallways or appearing to monitor the area.
- Excessive amounts of alcohol or illegal drugs in rooms.
- Evidence of pornography.
- Minors left alone in room for long periods of time.
- Excessive number of people staying in a room.
- Extended stay with few or no personal possessions.
- Provocative clothing and shoes.
- Constant flow of men into a room at all hours.
- Excessive amounts of sex paraphernalia in rooms (condoms, lubricant, lotion, etc.).
- Rooms stocked with merchandise, luggage, mail packages, and purses/wallets with different names.

Each indicator alone may not necessarily mean a person is being trafficked.

WHAT TO DO IF YOU SUSPECT HUMAN TRAFFICKING

- ❌ Do not at any time attempt to confront a suspected trafficker directly or alert a victim to your suspicions.
- ! Call 9-1-1 for emergency situations—threats of violence, physical assault, emergency medical needs, etc.
- 📞 Follow your corporate protocol, such as by notifying management and security.
- 🇺🇸 Call 1-866-DHS-2-ICE (1-866-347-2423) to report suspicious criminal activity to federal law enforcement. Highly trained specialists take reports from both the public and law enforcement agencies. Submit a tip at www.ice.gov/tips.
- 🇺🇸 To get help from the National Human Trafficking Resource Center (NHTRC), call 1-888-373-7888 or text HELP or INFO to BeFree (233733).



SIGNS OF HUMAN TRAFFICKING

For **Food** and **Beverage** Staff

Food and beverage staff may have access to a guest's room or see them using the hotel restaurant or bar. Be conscious of these signs indicating a guest may be a victim of human trafficking.

GENERAL INDICATORS

- Patron entertaining a minor at the bar or restaurant that he/she did not come in with originally.
- Patron claims to be an adult although appearance suggests he/she is a minor.
- Individuals loitering and soliciting male patrons.
- Individuals waiting at a table or bar and picked up by a male (trafficker or customer).
- Individuals asking staff or patrons for food or money.
- Individuals taking cash or receipts left on tables.

Each indicator alone may not necessarily mean a person is being trafficked.

WHAT TO DO IF YOU SUSPECT HUMAN TRAFFICKING

- ❌ Do not at any time attempt to confront a suspected trafficker directly or alert a victim to your suspicions.
- ! Call 9-1-1 for emergency situations—threats of violence, physical assault, emergency medical needs, etc.
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Appendix V: Hotel Chain Company Actions:

The following information was provided by AHLA.

Best Western International, Inc. (“Best Western”)

- Best Western has adopted a corporate human rights policy that denounces human rights violations, to include human trafficking and the exploitation of children.
- Best Western® branded hotels are required to comply with the corporate human rights policy.
- Best Western’s human rights policy is posted on its Best Western for a Better World® website.
- Best Western for a Better World contributes to charities that provide assistance to victims of child sex trafficking and that work to raise awareness about prevention of human trafficking.
- Best Western educates Best Western branded hotels about the importance of recognizing and reporting incidents of human trafficking in various publications to its membership.
- Best Western encourages Best Western branded hotels to educate and train their employees on human trafficking matters, including establishing policies for reporting suspected trafficking and displaying awareness posters.

- Best Western presents to Best Western branded hotels at multiple meetings each year about human trafficking and what hotels and their staff can do to prevent human trafficking.
- Best Western branded hotels cooperate and support investigations by local, state, and federal law enforcement agencies that have resulted in the disruption of sex trafficking activities.

Carlson Rezidor Hotel Group

- 1999: Carlson's commitment to protecting children at-risk dates back to 1999 when Carlson helped fund and found The World Childhood Foundation.
- 2004: Carlson joined ECPAT and was the first global hotel company to sign the ECPAT Code of Conduct. The Carlson Rezidor Hotel Group's director of responsible business serves on the board of directors for TheCode.org.
- 2011: Carlson Wagonlit Travel, the largest travel management company in the world, began issuing advisories on electronic tickets issued in the U.S. to the 27 countries where there is a prevalence of child sex tourism. To date, nearly 250,000 traveler itineraries have contained warning alerts as well as a call to action for customers to join it in reporting suspicious activity to the National Human Trafficking hotline, another organization Carlson helps fund.
- 2013: Carlson was the inaugural winner of the *Presidential Award for Extraordinary Efforts to Combat Trafficking in Persons*, a prestigious award presented at a White House ceremony.

- Carlson is also a founding member of the Global Business Coalition Against Human Trafficking (gBCAT). The Carlson Rezidor Hotel Group's director of responsible business serves on its Board.

- Carlson Rezidor Hotel Group has created training programs designed for all hotel managers and employees. The curriculum is delivered through a train-the-trainer approach and is mandatory in all of Carlson's 1300+ hotels worldwide. Carlson has trained nearly a thousand hoteliers, who have in turn trained thousands more.

- Carlson offers this training freely to competitors in other hotel groups and to members of the American Hotel & Lodging Association.

- Carlson is aware that large events such as the Olympics, the Super Bowl, or World Cup bring an increased risk for human trafficking. Consequently, it proactively reaches out to its hotels in close proximity to such events to ensure hotel employee training is up to date and ask that refresher courses be offered prior to the event.

- A corporate policy regarding the protection of children from commercial sexual exploitation has been in place since 2005. Carlson recently expanded this language in the Code of Business Conduct and Ethics, and added human trafficking awareness to its annual online Ethics Training and certification for nearly 3,000 corporate employees.

- In Minnesota, Carlson has worked with the County Attorneys offices in Hennepin County (which includes Minneapolis and 42 suburbs) and Ramsey County, and law enforcement officials to help them develop their own training.

- Carlson has also worked with the U.S. Department of Transportation, the International Tourism Partnership, and many others to put an end to human trafficking.
- The American Bar Association consulted with Carlson and in February 2014 passed a resolution adopting the *ABA Model Business and Supplier Policies on Labor Trafficking and Child Labor*.
- Carlson has funded cross-sector trainings and brought attention to this issue through the Carlson Distinguished Lecture Series, which featured Nicholas Kristof, a NYT columnist, expert on human trafficking and author of the book and documentary “Half the Sky.” Carlson also partnered with the Minnesota Women’s Foundation in support of “Minnesota Girls are not for Sale” and provided financial support for the documentary “Not My Life”. Carlson sponsored the worldwide broadcast of this documentary on CNN International. With support from the Carlson Family Foundation, the World Affairs Council and its affiliates showed the film in 39 cities across the US in 2013 and has 16 cities scheduled so far this year. Most recently, the documentary was broadcast in India, with funding support from The Carlson Family Foundation. More than 250 million people watched “Not My Life” in Hindi.
- Carlson’s global anti-trafficking efforts were recently highlighted by the U.S. Global Leadership Council’s ‘Innovations in Smart Power’ report as an example of how the private sector and civil society can partner with government and NGOs to help advance the global good. <http://www.usglc.org/innovations-campaign/the-report/>

Hilton Worldwide

- In 2011, Hilton became the second U.S. based multi-brand hospitality company to sign the ECPAT Code of Conduct.
- Hilton conducts awareness and compliance training for general managers and department heads, reaching over 3,500 employees throughout its owned and managed properties in the United States and Mexico; expanding to five international markets in 2014. In 2013, the company also reached more than 45,000 Team Members through its Code of Conduct training which includes a section on child trafficking.
- The company offers the AHLEI /ECPAT-USA online course *The Role of the Hospitality in Preventing and Reacting to Child Trafficking* to its more than 4,200 hotels through its internal learning center, Hilton Worldwide University.
- Recently at the company's Global Partnership Conference, Hilton hosted trafficking awareness workshops for its owners with ECPAT-USA.
- The company provides information to employees on the issue of child trafficking through various internal communication and engagement channels.
- Hilton participates as a member of the International Tourism Partnership (ITP), helping to create the Human Trafficking Working Group.
- Hilton serves as a board member of gBCAT (Global Business Coalition Against Trafficking).

- In April 2014, Hilton and The Global Fund for Children (GFC) announced the Hilton Worldwide Anti-Trafficking Fund. This fund will support highly innovative grassroots organizations working every day to help children who have been or are at risk of being trafficked. Over the course of this initial three-year project, an estimated 1,500 children in Nigeria, South Africa, Thailand, Turkey and the United Kingdom will be reached.
- The ECPAT-USA Exhibit booth at GBTA Convention 2014 was sponsored by Hilton. ECPAT-USA representative, Michelle Guelbart instructed buyers, suppliers, and other participants on what their companies can do to combat trafficking and exploitation in travel and tourism.
- Hilton partners with Vital Voices, a global network that aims to empower women to accelerate peace and prosperity in their communities. Together they developed the Global Freedom Exchange, a dynamic mentoring opportunity for emerging and established women leaders on the forefront of efforts to intervene in child trafficking.

Hyatt Hotels Corporation

- Hyatt helped develop the industry-wide International Tourism Partnership's human rights and human trafficking position statement to support common frameworks, develop strategies to prevent human trafficking and share best practices.
- Hyatt teamed up with the Polaris Project – a global organization working to combat the trafficking – to develop a comprehensive training program, which was rolled out across its entire portfolio of managed hotels in the fourth quarter of 2012. This training is a “brand standard,” making it required training for key hotel functions including housekeeping,

front desk, concierge, bell-staff, hotel management and our security teams. In 2013, more than 44,000 Hyatt associates around the world completed the training program. Hyatt also requires its franchisees to adhere to this “brand standard” and have appropriate human trafficking training measures in place.

- Hyatt reports annually on its human trafficking efforts through its Corporate Responsibility reports, which are available to the public at HyattThrive.com.
- Hyatt developed and implemented specialized human trafficking awareness training programs for hotel staff in cities hosting major global sporting events including:
 - The FIFA World Cup in South Africa (Johannesburg)
 - The FIFA World Cup in Brazil (Sao Paulo)
 - The Super Bowl in Indianapolis (2012), New Orleans (2013), New York/NJ (2014) and Phoenix (2015).
- Hyatt supports the DHS Blue Campaign – the Department of Homeland Security comprehensive program to end human trafficking. Materials from this program were used as part of the specialized awareness program for the 2015 Super Bowl in Phoenix.
- Hyatt has supported a number of human trafficking investigations by local, state, and federal law enforcement agencies that have resulted in the disruption of sex trafficking activities being carried out by criminal syndicates.

Intercontinental Hotel Group (IHG)

- 2009: Developed IHG’s Board approved Human Rights Policy.

- 2010: Signed the UN Global Compact aligning our operations and strategies with the 10 universal principles that include commitments to human rights and labour standards.
- 2012: Joined the International Tourism Partnership's Human Trafficking Working Group resulting in the publication of the industry statement on human trafficking.
- 2012: Trained UK hotels on IHG's approach to human rights as part of preparation for the London 2012 Olympic and Paralympic Games.
- 2013: Agreed to an IHG brand standard which requires all IHG hotels to adopt, display and make colleagues aware of a Human Rights Policy at the individual property level.
- 2014: Proactive communications to specific hotels to raise awareness of human rights ahead of the Superbowl in the U.S. and the World Cup in Brazil given the documented increase in human trafficking in connection with these sporting events in previous years.
- 2014: Human Rights Global Standard officially launched to hotels at the individual property level. This global standard demonstrates IHG's ongoing commitment to operating as a responsible business.
- 2014: Joined Business for Social Responsibility and Business in the Community Cross Industry Working Group on Human Rights.

Marriott International

- In 2011, Marriott delivered "Human Rights and the Protection of Children" training to all employees. The training was mandatory for all Marriott managed properties

covering more than 144,000 employees and was provided to all Marriott franchise properties worldwide. Beginning in 2012, the company integrated this training into the onboarding process for all new employees.

- Marriott also delivered “Human Rights and the Protection of Children” training developed specifically for its Loss Prevention Directors and Officers at all managed properties worldwide. The training is part of the required security officer certification program. In the Americas, through AHLA, 2,312 officers received the training. An additional 3,198 officers received the training in the Asia Pacific, Middle East & Africa and Europe regions.

- In 2007, the company amended its annual Legal and Ethical Conduct Survey, required of all officers and key senior managers, to specifically inquire as to whether the respondent is aware of any instance of indecent or exploitative treatment of minors.

- Marriott Global Safety & Security partners with law enforcement agencies to report and investigate alleged incidents of sexual exploitation of children at Marriott properties.

- Marriott has partnered with the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons to help victims of sexual exploitation lead self-sustaining lives through skills learned in hospitality training programs. The Youth Career Initiative is a 6-month program that teaches young adults life and employment skills through on the job instruction, training and mentoring provided by hotel management associates.

- Marriott participated in the International Tourism Partnership’s Human Trafficking Working Group and was instrumental in the creation of an Industry Position Statement on Human Trafficking that includes a commitment to corporate policies, awareness training and sharing best practices.

- Marriott participated in two United Nations World Tourism Organization (UNWTO) events and shared its approach in addressing human trafficking within the context of its business. In April 2012 in Vienna, Austria, Marriott participated in the panel “Building a Better Response: Human Trafficking in the Context of Tourism,” which included the heads of the UNWTO and the United Nations Office on Drugs and Crime.

Starwood Hotels & Resorts

- Starwood offers “Human Rights: Human Trafficking Awareness” training for all manager level associates. Training is provided in English, Portuguese and Spanish with additional foreign language translations planned for this year. There is also a separate training available for all associates, also available in the above mentioned languages.

- Starwood plans to have completed training of all managers by the end of 2014. As part of the training, managers are provided toolkits and resources to cascade the message and materials to their associates.

- Starwood has created and posted its Human Rights Policy and Human Trafficking Position Statement (developed with the International Tourism Partnership) on its public external website and in the training center of its intracompany website.

- The Human Trafficking Position Statement and Human Rights Policy is included in all corporate new hire packages and included in the onboarding process for all new associates.

- Starwood's training materials are reviewed by ECPAT and Polaris. There is ongoing communication with ECPAT regarding updates to training materials. In addition, the US Department of State: Office to Monitor and Combat Trafficking in Persons has served as an additional expert reviewer for Starwood's training program.

- Starwood includes in all supply chain contracts, a statement referencing our stance and policy against Human Trafficking.

Wyndham Hotels & Resorts

- Wyndham is a signatory to the ECPAT Code of Conduct and one of its executives sits on the ECPAT board.

- Wyndham has developed training programs for its managed and franchised properties.

- Wyndham was involved in coordinating the ECPAT/AHLA training module.

- Wyndham has donated over 2 million Wyndham Rewards points to the Polaris Project to help in situations where victims are recovered and need a place to stay.

- Wyndham uses the Polaris Project as an emergency contact and assistance provider to help give hotel staff guidance if they suspect an incident of trafficking.

Appendix VI: State Specific Hotel Industry Actions:

The following information was provided by AHLA.

Arizona Hotel Industry

- The Arizona Lodging & Tourism Association (ALTA) has been working with the O'Connor Institute (Justice Sandra Day O'Connor's non-profit organization) on a program called the SAFE Action Project, to train hotel employees on trafficking issues. The program has already trained a number of properties and recently received funding to train another 60 properties by January.
- ALTA produced a video on trafficking with the O'Connor Institute and distributed to its membership.
- The CEO of the ALTA sits on the City of Phoenix Trafficking Task Force and the Arizona Human Trafficking Council after being appointed by Governor Brewer.

Georgia Hotel Industry

- The Georgia Hotel & Lodging Association (GHLA) has partnered with the Georgia Bureau of Investigation to produce workshops on trafficking for its members. The first session had over 100 attendees, and GHLA expects over 60 at the second session. GHLA will be continuing to offer the workshop at different locations around Atlanta and the state.
- The session runs about 90 to 120 minutes. There is no charge to attend the workshop and multiple attendees from each property is encouraged.

Hawaii Hotel Industry

- In March 2015, the Hawaii Lodging & Tourism Association submitted testimony to the Hawaii House Judiciary Committee in support of legislation to further criminalize sex trafficking and protect the rights of the victims.

- In July 2015, the Honolulu Star-Advertiser highlighted the work on women in the hotel industry in combatting trafficking: “Female leaders from the state's visitor industry are urging businesses to play a greater role in stopping sex trafficking... Hawaii Women in Lodging & Tourism, an offshoot of the Hawaii Lodging & Tourism Association, [spoke] to representatives of about 75 companies during a luncheon last week at the Neal Blaisdell Center... [The] female leaders want their companies to implement new standards and employee training programs geared to reducing prostitution in Hawaii... The drive is due partly to efforts by the American Hotel & Lodging Association to prioritize an anti-sex trafficking agenda because illegal acts take place at hotels.

Oklahoma Hotel Industry

- On April 7th, 2015, the Oklahoma Hotel & Lodging Association (OHLA) partnered with No Boundaries International and the Oklahoma Bureau of Narcotics & Dangerous Drugs to present an educational session titled "Human Trafficking and it's Connection to Oklahoma". In the session, hoteliers and employees learned what role Oklahoma plays in trafficking; how lodging operators and their staff can help identify trafficking situations; and what to do if you suspect trafficking.

- OHLA plans to offer two 1/2 day training sessions in the fall of 2015 in Oklahoma City and Tulsa.

Rhode Island Hotel Industry

- The Rhode Island Hotel Association (RIHA) has proactively worked to spread awareness of human trafficking over the last several years. In 2013, RIHA hosted a meeting with the Department of Homeland Security and hotel general managers on trafficking. In May 2014, RIHA had the Chief Justice of the RI Family Court, Haiganush R. Bedrosian, attend as a guest speaker at its board meeting. Judge Bedrosian, who sees victims of human trafficking on a regular basis in her courtrooms, explained how pervasive the problem is and gave suggestions for how the industry could help. In addition, RIHA President/CEO Dale Venturini and other staff took part in the ECPAT online training program and shared the information on the training with the association membership.

- RIHA hosted a seminar with the US Immigration & Customs Enforcement Agency (ICE) on human trafficking in April, 2015. The seminar taught attendees how hotels can recognize the signs of human trafficking, safe reporting techniques and how the hotel industry can prevent trafficking.

Washington State Hotel Industry

- In 2011, after a number of landmark bills passed in Washington addressing sex trafficking, a Bellevue, WA, foundation hosted a series of meetings to examine the role that businesses might have in preventing trafficking in local communities. In those meetings, a clear consensus emerged: Small to medium size businesses were central to the prevention and reporting of human trafficking locally, yet they were almost entirely absent in state and national efforts to do so. To bridge that gap, the nonprofit Businesses Ending Slavery and Trafficking (BEST) was established in 2012.

- Soon after its creation, BEST partnered with the Washington Lodging Association (WLA) and together developed and launched the Inhospitable to Trafficking program. Bringing together leaders in lodging, law enforcement, and victim services, the Inhospitable to Trafficking program helps hoteliers develop city and county-specific best practices and promotes ongoing collaboration in identifying, reporting and averting trafficking and its related crimes. Since March 2013, more than 500 lodging staff in five counties in Washington State have participated in the Inhospitable to Trafficking program to:

- Learn about sex trafficking in the local area and learn how it involves lodging establishments.

- Learn to recognize indicators of trafficking and prostitution in lodging establishments.

- Learn who to call for a law enforcement response, how to encourage a timely and discrete response, and what to expect if law enforcement intervenes.

- Protect guests and staff from unnecessary suspicion of wrongdoing by learning steps to take before contacting law enforcement.

- Learn to establish brand-appropriate policies and practices to mitigate legal risks.

- Discover what information hoteliers can share when law enforcement initiates a criminal investigation without a warrant.

- Gain resources for educating hotel staff and law enforcement officers about human trafficking.

- Receive training to access a secure, members-only website for sharing real-time information about suspected criminal activity.

Wisconsin Hotel Industry

- The Wisconsin Hotel & Lodging Association (WHLA) published an article on human trafficking for the Wisconsin lodging industry authored by law enforcement partners.
- WHLA hosted a human trafficking training event for Wisconsin's lodging industry in September 2014.