Introduction

Human trafficking is a criminal activity that generates US$150 billion in profits per year. Two thirds of this amount comes from commercial sexual exploitation, while the other third results from forced economic exploitation.

The nature and necessities of human trafficking - the requirement for continuous movement, temporary accommodation and supply of low cost products and services - put hospitality businesses (hotels, restaurants, catering companies, etc.) at a high level of exposure, but at the same time in a unique position to identify and combat this criminal activity.

Our sector is often accused of ‘turning a blind eye’ to human traffickers by outsourcing our cleaning and catering services to dubious sub-contractors; allowing sexual trafficking on our premises; employing migrant workers without appropriate due diligence; buying products produced by forced or bonded labour; labour exploitation or violation of labour rights; or by simply ‘not noticing’. But it is a common ‘secret’ that traffickers merely take advantage of the privacy and anonymity we offer our guests and are able to operate at low risk.

What is Human Trafficking?

Human trafficking is a form of modern day slavery that involves the deceptive or coercive recruitment, transportation, harbouring and exploitation of individuals. Traffickers have absolute control over their victims and exploit them in a number of ways including:

- sexual exploitation
- forced labour or services
- slavery or practices similar to slavery
- servitude
- removal of organs
- forced begging
- illegal adoption
- forced marriage

The Difference from Human Smuggling

Human smuggling occurs when a person remunerates another (the smuggler) in order to migrate illegally and once the destination is reached the agreement usually ends. As such the person smuggled has consented to the transnational transportation for the purpose of migration.

Human smuggling therefore represents a violation against the state (or country of destination), whereas trafficking represents a violation against a person’s human rights.

Nevertheless, a human smuggling situation may turn into a ‘human trafficking’ case if the smuggler is dissatisfied with the amount of remuneration received; decides to abuse his/her power and take advantage of the vulnerability of the person smuggled and keep them captive for profit against their will.
The Magnitude of Human Trafficking

The true extent of human trafficking is difficult to determine. Different legal definitions, different reporting systems and different ways to record or classify crimes across the globe make measuring this crime a very complex task. It is well-recognised, however, that most officially reported victim statistics are gross underestimates. Globally, the ILO (2012) estimates there are 21 million victims of human trafficking. Within Europe, Datta and Bales (2013) estimate that there are 1.14 million victims. The majority of these are victims of sexual exploitation (66%), followed by labour exploitation (20%) and other forms listed above (13%).

Human Trafficking in Hospitality

Within the hospitality industry, sexual and labour exploitation are the most prevalent. According to Polaris, the US National Trafficking Resource Center, hotels and motels are the second most popular venue for trafficking for sexual exploitation, and restaurants and bars are the most popular venues for labour exploitation. Extrapolating Polaris hospitality industry statistics to the estimates of human trafficking victims in Europe (Datta and Bales, 2013) suggests that there are 115,140 annual victims of trafficking in the European hospitality industry including:

- 93,800 victims of sex trafficking in hotels
- 14,820 victims of forced or bonded labour in restaurants and bars
- 6,840 victims of forced or bonded labour in hotels

Who are the Traffickers?

With its high profitability, human trafficking ranks as the world’s third most profitable crime after illicit drug and arms trafficking. Unsurprisingly, criminals are attracted to trafficking as a high-profit and low-risk business opportunity.

There is no such thing as a ‘typical’ human trafficker, although there are some common misconceptions that they are typically middle-aged males. In reality, a high proportion of traffickers are women; over 50% in some countries and a much higher percentage than in other types of serious crime. It appears that trafficked victims, particularly those who are young, are more likely to trust female traffickers.

Often traffickers know their victims on a personal basis as a relative, a friend or through a ‘romantic’ attachment.

Who are the Victims?

The victims of human trafficking are some of the most vulnerable in society. There are a number of environmental conditions that increase this vulnerability including:

- poverty
- unemployment
- limited education
- civil unrest
- limited social support
- an unstable family life

A common misconception about victims is that they identify themselves as a victim and therefore will seek out help or assistance. In reality, however, many do not consider themselves to be victims of a crime and are unwilling or afraid to seek help. They may also fear going to the authorities, particularly if they are unaware of their human, legal or immigration rights or if they have no alternative means of support. Some victims develop an ‘attachment’ to their traffickers even when they use both force and fear to control victims – including the threat of physical harm to the victims and/or their families and friends. Alternatively, traffickers develop the victims’ dependency on drugs or alcohol which they supply.

A second misconception is that victims of trafficking are female and/or children. In reality, however, victims of trafficking include both genders and children and adults. Eurostat (2015) report that of the registered trafficking victims between 2010 and 2012, 13% were girls and 3% were boys (under the age of 18); 67% were adult females and 17% were adult males. Over the same time period, most victims trafficked for sexual exploitation were female (95%) and most victims of labour exploitation were male (71%).
Human Trafficking as a Business Risk

To assess human trafficking as a risk – the likelihood or possibility of a trafficked victim being in your business and/or supply chain – it is important to identify the points where it may interface with your enterprise. One way to do this is to plot the trafficked victim’s specific path or journey through the business. The diagram below illustrates this journey in the front-of-house and identifies critical intervention points, or CIPS (in orange), where signals might suggest that a guest (or someone accompanying a guest) is a trafficked victim.

Barriers may be erected at these points in the victims’ journey to reduce opportunities for traffickers to trade. Some examples of likely signals and barriers are as follows:

<table>
<thead>
<tr>
<th>CIPS</th>
<th>SIGNALS</th>
<th>PROCEDURES, STANDARDS OR POLICIES PROVIDING BARRIERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-arrival: Reservations</td>
<td>Reservations Officer</td>
<td>Unusual block bookings by third party distributors (e.g., long stay in airport hotels). Monitor cancellation rate of such bookings and identify origin.</td>
</tr>
<tr>
<td>Arrival: Uniformed service</td>
<td>Doorman/concierge</td>
<td>Guests arrive independently or at different times. Probes into the reasons given for different arrival times. Limited or excessive luggage and request for assistance declined. If limited, then ask whether luggage will arrive later.</td>
</tr>
<tr>
<td>Arrival: Front desk</td>
<td>Front Office Agent</td>
<td>One person insists on signing in for the whole group. Confirm all people staying in the room. Verification with photo ID. Guests list a local address at registration. Engage in discussion to probe for reasons for stay. Refusing to leave credit card imprint and willing to pay in cash for multiple nights in advance. If no credit or debit card then valid photo ID a mandatory requirement.</td>
</tr>
<tr>
<td>Deposit/payment method</td>
<td>Doorman/concierge/FO/Other areas</td>
<td>Guests receiving an unusual number of visitors in public areas and/or in their rooms. Ask security staff to make contact and engage in discussion. Requests for extra clean towels and/or bedding whilst denying housekeeping services. Report incident to management. The room should not remain without service for more than 24 hours.</td>
</tr>
<tr>
<td>Guest movements in hotel</td>
<td>Doorman/concierge/FO/Other areas</td>
<td>Room status</td>
</tr>
</tbody>
</table>
The trafficked victim’s journey can also be plotted through the back-of-house; again with identifiable points of intervention.

### TRAFFICKED VICTIM’S JOURNEY IN THE HOTEL’S BACK-OF-HOUSE

<table>
<thead>
<tr>
<th>Signal</th>
<th>Procedure, Standards or Policies Providing Barriers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outsourcing tender/Bid Specs</td>
<td>Procurement</td>
</tr>
<tr>
<td>Needs/risk analysis</td>
<td>Procurement</td>
</tr>
<tr>
<td>Procurement of a service</td>
<td>Agency or supplier recommended for significantly low cost. RFQ to comply with Employment law and Dhaka principles. See <a href="http://dhaka-principles.org/">http://dhaka-principles.org/</a></td>
</tr>
<tr>
<td>Supplier due diligence checks</td>
<td>Procurement/Human Resources</td>
</tr>
<tr>
<td>Suppliers</td>
<td>Unknown/unclear provenance of goods purchased or exceptionally low priced goods. Due diligence check on company records and tax payment evidence – including references. Require supplier to sign company’s Code of Conduct.</td>
</tr>
<tr>
<td>Staff agency</td>
<td>Staff recruited and selected on basis of recommendation only. Compliance with Dhaka RFQ competitive process with defined set of selection criteria.</td>
</tr>
<tr>
<td>Staff clock-in</td>
<td>Security, management and peers</td>
</tr>
<tr>
<td>Behaviour</td>
<td>Staff member always dropped off by the same vehicle and never independently arrives at work. Engage staff member in friendly conversation about journey to work and check home addresses etc.</td>
</tr>
<tr>
<td>Staff on duty</td>
<td>HODs, colleagues, staff cafeteria, guests</td>
</tr>
<tr>
<td>Behaviour</td>
<td>Erratic or withdrawn behaviour of staff member and willingness to undertake excessive overtime and/or continuously work unsociable shifts. Observe behaviour and engage with employee.</td>
</tr>
<tr>
<td>Physical appearance</td>
<td>Signs of physical abuse (bruises, black eyes, burns, scars) or maltreatment (extreme exhaustion or malnutrition). Observe appearance and engage with employee.</td>
</tr>
<tr>
<td>Staff clock-out</td>
<td>Security</td>
</tr>
<tr>
<td>Behaviour</td>
<td>Staff member always being picked up by the same person/car/van. Monitor behaviour and engage with employee.</td>
</tr>
<tr>
<td>Payment</td>
<td>Finance/internal audit</td>
</tr>
<tr>
<td>Contract payment</td>
<td>Payments required in cash. Require bank transactions wherever possible.</td>
</tr>
</tbody>
</table>
The overall guidance in terms of your workforce is to scrutinise and monitor your relationships with staff and external agencies; engage with your workforce and ensure you provide a fit and proper workplace (www.staff-wanted.org).

Caution is needed when identifying a potential victim in either the front- or the back-of-house. This is not just about simple observation; it is a more complex process involving multiple signals, asking appropriate questions, listening for answers and unveiling possible signs of coercion and exploitation. Therefore, a designated, trained, ‘go-to’ person for such situations is needed in order to support staff identifying potential trafficking situations as well as the presumed victim.

**How to Take Action**

In suspicious cases, first make sure that you gather and preserve sufficient evidence in order to help law enforcement in prosecuting perpetrators. Then:

- Report to 999 (or your national police force if outside the UK) if you think someone is in immediate danger or 101 if there is no urgency.
- You can also call the Modern Slavery confidential helpline on 0800 0121 7000 to report and seek advice.
- In England and Wales, you can ring the confidential helpline of the Salvation Army on 0300 3038151.

**Conclusion**

Human traffickers are criminals who take advantage of any ‘path of least resistance’ offered to them in order to increase their profits. Our sector is perceived as defenceless to their activities and is considered by some as complicit. Although there is a certain level of awareness among professionals we need to become more active in combatting trafficking in our businesses. The reputational and legal risks the sector is now facing are dwarfed by the moral obligation we have towards the victims and survivors of this form of slavery.

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**Co-authors** Professor Dr Angela Roper FIH, Professor Alexandros Paraskevas at the University of West London (UWL) and Dr Maureen Brookes at Oxford Brookes University are working together with a consortium of academics and NGOs to fight human trafficking and modern slavery in the hospitality and tourism industry. Professor Paraskevas is the Principal Investigator for The COMBAT Project, which will develop a practical...
toolkit with policy and training recommendations to be launched in 2016. Professor Dr Roper is Director of the International Centre for Hotel and Resort Management. Dr Brookes is a Reader in Marketing at the Oxford School of Hospitality Management and President of ICHRIE.

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**Further Resources**

**CIPS: Modern Slavery Act 2015** - an overview of the Act focusing on the impact on Supply Chains and the role of Procurement.

**Combat THB website** - information on human trafficking, soon to offer a training toolkit (August 2016)

**Crown Prosecution Service (CPS)** - website providing information on trafficking, smuggling and slavery.

**Modern Slavery Act 2015** - the UK legislation as originally enacted and including revisions.

**Home Office (UK)** - modern slavery website and helpline providing information on modern slavery including the types of slavery, the signs to spot, the reporting mechanism and the appropriate referral processes for victims.

**Human Rights Watch** - an international non-governmental organization that conducts research and advocacy on human rights.

**Modern Slavery** - UK government resources and information to support the prevention and prosecution of modern slavery.

**National Crime Agency (UK)** - the National Crime Agency leads UK law enforcement’s fight against serious and organised crime by disrupting and prosecuting serious and organised criminals presenting the highest risk to the UK. Search this site for trafficking information.

**NWG Network** - a UK network of over 12,000 practitioners who disseminate information to professionals working on the issue of child sexual exploitation (CSE) and trafficking within the UK.

**UNODC** - the United Nations Office on Drugs and Crime (UNODC) assists States in their efforts to implement the Protocol to Prevent, Suppress and Punish Trafficking in Persons (Trafficking in Persons Protocol).

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**DISCLAIMER**
This brief is intended as a guide only. While the information it contains is believed to be correct, it is not a substitute for appropriate professional advice. The Institute of Hospitality can take no responsibility for action taken solely on the basis of this information.