



RECOGNITION & RESPONSE TRAINING

Human Trafficking in the Hotel Industry

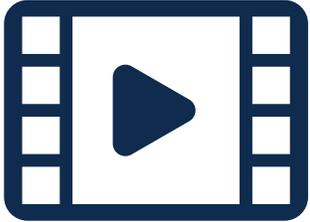
PRINT VERSION OF COURSE



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HUMAN TRAFFICKING



WATCH "HUMAN TRAFFICKING
OVERVIEW" VIDEO

[1][2][3]

DEFINING HUMAN TRAFFICKING

Federal law gives us a more detailed definition of the two categories of human trafficking:

Sex Trafficking:

Sex trafficking is the recruitment, harboring, transportation, provision, or obtaining of a person for the purposes of a commercial sex act, 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, (22 USC § 7102).

Labor Trafficking:

Labor trafficking is the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purposes of subjection to involuntary servitude, peonage, debt bondage, or slavery, (22 USC § 7102).

Sex and Labor trafficking do not require movement across international borders or across state lines. Many are sold within their own community. [4]

UNIT CLOSE

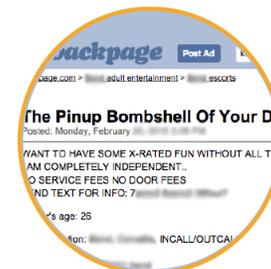
INTERSECTION WITH THE HOSPITALITY INDUSTRY

Changes to Trafficking

As awareness has grown across the country and police departments have joined the effort on a larger scale, it has become riskier than in the past for traffickers to parade their wares up and down the street.

Traffickers have also found that, with the Internet and the growing number of online escort services and websites, the opportunity to connect with buyers has grown exponentially - and resulted in increased profitability and a decreased risk of detection. This added opening in connecting buyers with demand has also drastically raised the volume of trafficking occurring in hotels, making it a major point of sale.

**STREET
TO
ONLINE**



POINT OF SALE

Traffickers will use any method available to exploit a person or business. The hotel industry - a necessary and valuable business - has become an unwitting facilitator. In fact, hotels are the primary point of sale for the commercial sex industry. The privacy a hotel room offers, with its easy access to the Internet and the escort services found online, creates a merger of anonymity and technology. For this reason it is key that the industry takes the lead in the fight against human trafficking by equipping hotel staff to recognize and respond to it.

UNIT 2: INTERSECTION WITH THE HOSPITALITY INDUSTRY

Anonymity & Technology

The use of hotels for sexual exploitation is not a new phenomenon; it has simply been overlooked, unrecognized or misunderstood by the hospitality industry itself. While hotels are not causing sexual exploitation, they have unfortunately become the major shelter for commercial sex trafficking in the United States.

Traffickers target hospitality businesses as unknowing or willfully blind participants in their crimes. Since other crimes are often linked to human trafficking, sellers often place hotel employees and guests at risk. Unfortunately, the transient nature of hotel clients leaves hotels especially vulnerable to this kind of misuse.



RECOGNITION OF HUMAN SEX TRAFFICKING

Recognition begins with an understanding of how this criminal business enterprise is exploiting the hospitality industry - a legitimate business that serves a vital need. Hotels are guest-centered and work to ensure the privacy of their patrons.



These circumstances create an attractive environment for sellers and buyers. As a result, sex trafficking takes place within the hospitality industry, whether in small, privately owned motels or luxury hotels. To date, most hotel employees have never received training to recognize human trafficking and lack a meaningful reporting system that can be of assistance to law enforcement.

HOTEL VULNERABILITIES TO TRAFFICKING

- Privacy
- Anonymity
- Guest Centered
- Untrained Staff
- Accommodating
- Transient Nature

LEGAL REPERCUSSIONS OF HUMAN SEX TRAFFICKING

As government and law enforcement agencies pinpoint the hospitality industry as being at "high risk" for involvement, national initiatives to combat human sex trafficking are on the rise. In response to the growing call for accountability to address demand, the federal government is taking steps to hold such businesses liable for trafficking that happens at their hotels. Federal regulations are going into effect that will create mandates for hospitality businesses to have corporate human trafficking compliance programs.

With knowledge comes responsibility. Lawmakers across the country are beginning to see the connection between human sex trafficking and the hospitality industry, resulting in a movement to pass laws requiring action with the corresponding consequences for those businesses that do not comply. This also sets the stage for civil liability for businesses that fail to take appropriate action or when harm is done to a victim.



UNITED STATES OF AMERICA V. KANUBHAI PATEL:

"Louisiana Motel Owner Pleads Guilty in Sex Trafficking Case - Sex Trafficking Scheme Used Threats, Violence, and Coercion to Compel Women Into Prostitution in New Orleans and Elsewhere" [5]

The U.S. Trafficking Victim's Protection Act (TVPA):

This legislation paved the way for a recent sex trafficking indictment by the United States government against a hotel owner and now opens the door to bring legal action against individuals who indirectly support the actions of traffickers. [4]

Justice for Victim of Trafficking Act of 2015:

This bill permits the government to impose a fine against any person or entity involved in human trafficking and also forfeiture of property that was involved in the commission of human trafficking crimes. [6]

WHERE HOTELS STAND ON HUMAN SEX TRAFFICKING

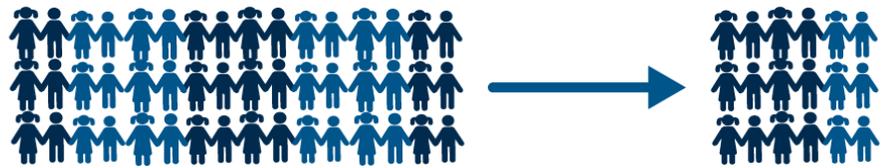
Reversing the Model

Recognizing that both traffickers and buyers have targeted their industry, hospitality businesses can take a leading role in the fight against the exploitation of women and children and dramatically degrade the profitability of this crime. By doing so, hotels can reverse the low-risk, high-reward incentive for traffickers and buyers. Having a trained staff, along with established policies and procedures will be viewed favorably and limit the risk of liability.



There is certainly a business reward to taking action, but there is also a humanitarian one. When a hotel trains its staff to recognize and respond to suspected incidents of human trafficking, the primary point of sale becomes a hostile environment for trafficking. As the risks of selling women and children outweigh the potential rewards, the crime becomes unsustainable -- and there is no longer an incentive to recruit or force people into sexual bondage.

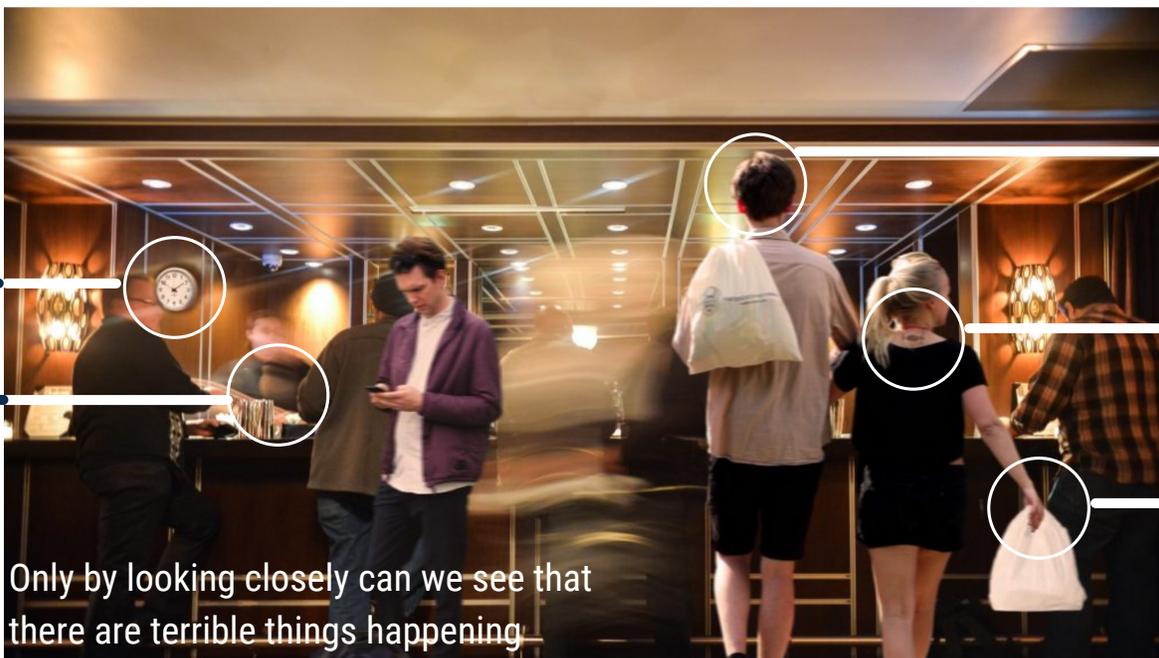
**THE RESULT IS
DRAMATICALLY
FEWER VICTIMS**



UNIT CLOSE

BASIC RECOGNITION TRAINING

WHAT DO YOU SEE?



Should be in school

Payment already made under a different name before arrival. Paid using an anonymous credit card.

Only by looking closely can we see that there are terrible things happening

With an older man that isn't her father

The Victim - a minor, tattooed with a crown

Provocatively dressed for her age, carrying clothes in a plastic bag

RED FLAG INDICATORS

As with all crimes, if we are to stop them from taking place, we need to be alert and able to interpret their signs. We may think to ourselves, "Something doesn't seem right about that," but not understand what we are seeing.

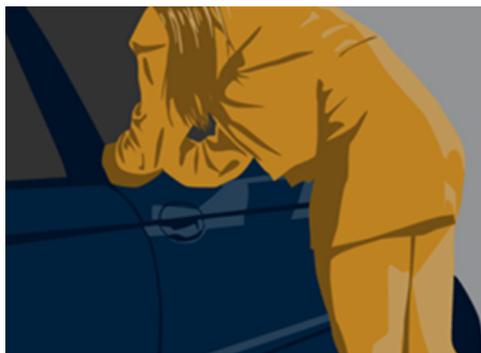


Guardian Group has developed a list of ten high-risk signs of human trafficking. While observing a single "red flag" does not necessarily mean human trafficking is occurring, seeing multiple indicators very likely does. We've organized each indicator by which staff is most likely to observe it, however all personnel should be alert to every red flag.

ALL STAFF



A young woman walks into the hotel looking for a room and appears nervous, scared, unsure or disheveled. She may have signs of physical abuse, suspicious marks, tattoos of a person's name, or is dressed inappropriately for her age or weather conditions.



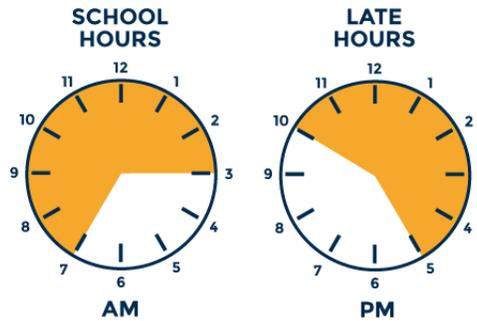
UNIT 3: BASIC RECOGNITION TRAINING



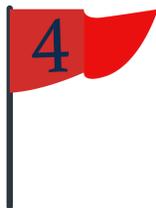
A young woman/minor is constantly watched, demeaned or controlled by another person, doesn't make eye contact with others, and/or appears to be with someone much older whom she calls her "boyfriend" or "daddy."



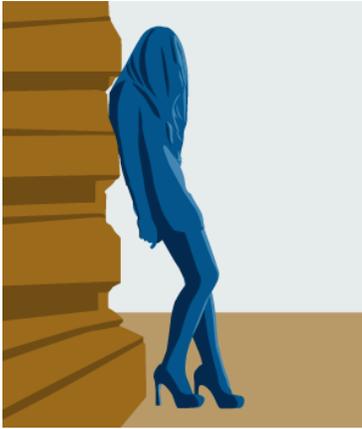
A young woman/minor is with someone during school hours or very late at night.



VALET, CONCIERGE & DOOR STAFF



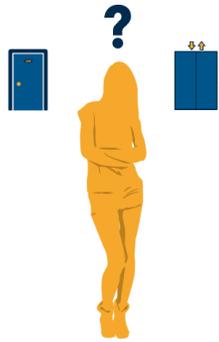
A young woman/minor is dropped off at a hotel. The driver waits in the parking lot. The young woman/minor may visit frequently.



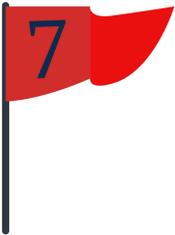
FRONT DESK & LOBBY STAFF



A woman/minor walks into a hotel lobby, and the front desk staff does not recall her checking in. The woman then appears to be looking for the elevator and is unsure where to find her room.



A young woman/minor attempts to check into the hotel without identification, and has no personal possessions, or few possessions carried in a small or plastic bag at check-in. She may also be uncertain about personal information, such as her address and phone number.



An adult woman or man checks into a room with a minor who does not appear to be his or her child, or the age difference seems inappropriate.



Unregistered men come into a hotel at various intervals and visit the same room. These individuals may leave the room at odd hours, go into another room, hang around outside the room, in hallways or in the lobby, appearing to deliberately waste time or keep watch on the area.



HOUSEKEEPING STAFF



Housekeeping finds a large amount of cash, condoms, sex paraphernalia, illegal drugs and/or alcohol.



Housekeeping finds an apparently underage person or multiple underage children in a room unattended - this should trigger a call to police.



HAVE YOU SEEN SEX TRAFFICKING?

Now that you have the tools to identify potential instances of sex trafficking, on the next page, Guardian Group would like to know about your experiences with sex trafficking. Your responses to the following questions are extremely valuable; they will affect the way policing and policy form around this issue. If you know or even suspect you are seeing evidence of sex trafficking, you will next want to know what to do with this information. What you must NOT do is take action on your own. Doing so could be dangerous to you, the victim and others. Our next section will tell you how and to whom to report your suspicions.

Take the survey [here](#).

UNIT CLOSE

BASIC RESPONSE TRAINING

WHAT TO DO

Suspicious Activity

Each member of the staff has an opportunity to observe suspicious activity, but it is important to follow internal protocols.

- If employees observe suspicious trafficking activity, it is advisable that they record their observations and immediately notify the on-duty supervisor. The supervisor is responsible for notifying law enforcement.
- A reporting form will be provided to ensure vital information - such as names, descriptions, license plates and room numbers - is not omitted.



The supervisor or manager will contact the appropriate authorities or 911 to report any incident that needs immediate response (threats of violence, physical assault, emergency medical needs). Making a report to the police or calling for a police response to the hotel should be a management decision, unless the nature of the emergency dictates otherwise.

Observing with Caution

Small observations reported to the right recipient - the police, a manager - can help rescue victims. However, it must be recognized that not all suspicious activity is of a criminal nature. When observing unusual activity, it is possible to draw the wrong conclusion.

WHAT NOT TO DO

Do **NOT** Confront Victims

An employee should not attempt to confront or rescue a child or adult, as this could jeopardize the safety of the victim, hotel guests or the employee.



REPORTING MECHANISM

Critical Information

Guardian Group's hotel initiative seeks to turn observation into action. This pre-formatted report will assist you in documenting suspicious activity and provide management with much needed information that can be passed on to law enforcement.

Employees who observe suspicious activity should immediately notify their supervisors and explain to them what was observed. After notifying their supervisors, trained employees should complete this incident report prior to the completion of the shift in which the suspicious activity was observed. Decisions to call for local police assistance and the National Human Trafficking Hotline (888) 373-7888 should be made by a supervisor or manager unless an emergency requires an immediate 911 response.

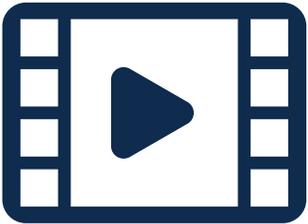
Download the Incident Report [here](#). Your supervisor will make copies available to you as well.

JOINING THE FIGHT

A Force for Good

Part of the success in the fight against human sex trafficking is YOU! Each of you plays a critical role in protecting those who are vulnerable and making your hotel an anti-trafficking environment. Having now completed this training, your hotel staff has been empowered and equipped to create social change and become a force for good.

Simply completing the questions on the next page will help us create social change!



WATCH "CLOSING VIDEO"
VIDEO

UNIT CLOSE

WRAP UP

Congratulations!

Congratulations! You now know a great deal about the largely hidden, but deadly crime of human sex trafficking, and particularly about your role in helping to stop it. Through your alertness and proper reporting of suspicious activity, you help to disrupt the crime at the point where supply meets demand, and drive it out of your business for good. You have become a Guardian.

You have completed the Guardian Seal® Hotel Training. This is an achievement that is testament to your organization's commitment to take a stand against the sale and exploitation of other human beings. Please take the time to fill out the feedback form below.

If you are the manager for your organization please send an email to contact@guardiangroup.org once your team has completed the course, so that we can mail your organization the Guardian Seal® Certification and Guardian Seal® decal.

We hope your organization will take advantage of the Guardian Seal® logo to proudly display at your place of business. The step your organization has taken in the fight against human trafficking is one worth commemorating.

Thank you for your participation, and congratulations, again!

RESOURCES

If you're interested in learning more about sex trafficking, please visit us at www.guardiangroup.org.

REFERENCES

- [1] Real Motion. "One Minute Facts: Human Trafficking." YouTube. YouTube, 18 Jan. 2014. Web. 04. Mar. 2016.
- [2] Urban Institute. Estimating the Size and Structure of the Underground Commercial Sex Economy in Eight Major US Cities. Rep. Washington D.C.: n.p./ 2014. Print.
- [3] Polaris Project. (2020). 2019 Data Report: The U.S. National Human Trafficking Hotline [PDF]. Polaris Project.
- [4] United States Government. (2000, January 24). Trafficking Victims Protection Act of 2000.
- [5] Leagle. "U.S. v. PATEL." By SARAH S. VANCE, District Judge. Leagle, 07 Jan. 2016. Web. 07 Mar.2016.
- [6] Cornyn, J. (2015, May 29). S.178 - 114th Congress (2015-2016): Justice for Victims of Trafficking Act of 2015. Congress.gov. <https://www.congress.gov/bill/114th-congress/senate-bill/178>.