

# Tourism and Human Trafficking:

A Mapping of Sex Trafficking & Labor Trafficking  
in the Tourism Sector



Human Trafficking Search 2021

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## I. Introduction

Over the past several decades, travel and tourism have become both more accessible and cheaper for people. Until the Covid-19 pandemic, tourism was projected to continue growing rapidly in popularity, with estimates that by 2030 more than 1.8 billion people would travel internationally every year.<sup>2</sup> The increase in international and domestic travel and tourism brings benefits such as expanded cultural understanding, economic growth, and preservation of local monuments and traditions. However, despite the benefits of tourism, there is a dark side to the industry: human trafficking.

This report seeks to map out the intersections between human trafficking and tourism and focuses primarily on sex trafficking and labor trafficking's presence within the tourism sector. The discussion of sex trafficking will include sex tourism, child sex tourism, and the use of hotels in the sex trade. The discussion of labor exploitation will include child labor and beggars, hospitality staff, construction staff, and labor trafficking in the supply chain. The report will also touch on how the Covid-19 pandemic has affected and changed modern slavery in the tourism industry. The report will conclude with mapping the current interventions and recommendations for combatting instances of human trafficking within the tourism industry.

In the United States....

- 8.2% of trafficking for sexual exploitation occurred in hotels
- 1.3% of trafficking for labor exploitation occurred in restaurants and bars
- 0.6% of trafficking for labor exploitation occurred in hotels<sup>1</sup>

Modern slavery happens in all countries and many industries around the world. In 2016, an estimated 40 million people were trapped in modern slavery, and 152 million children were victims of child labor.<sup>3</sup> Several factors make the tourism industry especially vulnerable to human trafficking and modern slavery compared to other industries. The relative anonymity provided by the frequent changeover of guests allows for trafficking victims to vanish unnoticed in hotels and airports. This is especially true of sex traffickers who may be using hotels and motels as part of their operation. The commonplace use of subcontractors for construction workers, security guards, wait staff, and cleaning or maintenance staff creates increased vulnerability for labor trafficking within the tourism industry itself.

According to Polaris, of the reported instances of trafficking in the United States, 8.2% of all sex trafficking and .6% of labor trafficking occurred in hotels and 1.3% of all labor trafficking occurred in restaurants and bars.<sup>4</sup> In the European Union alone, there are an estimated 115,140 victims of human trafficking involved in the tourism industry.<sup>5</sup> When it comes to sex trafficking, although the

<sup>1</sup> Oxford Brookes University et al., "COMBAT: Trafficking in Human Beings in the Hotel Industry"; Anthony, "On-Ramps, Intersections, and Exit Routes."

<sup>2</sup> Risi, "International Tourists to Hit 1.8 Billion by 2030."

<sup>3</sup> International Labour Organization, Walk Free Foundation, and International Organization for Migration, *Global Estimates of Modern Slavery*.

<sup>4</sup> Anthony, "On-Ramps, Intersections, and Exit Routes."

<sup>5</sup> Oxford Brookes University et al., "COMBAT: Trafficking in Human Beings in the Hotel Industry."

practice is present worldwide, Southeast Asia is a known hotspot for both sex tourism, where sex trafficking victims make up a percentage of those in the industry, and child sex tourism.<sup>6</sup>

## II. Tourism, Sex and Trafficking

Although sex trafficking occurs globally and affects people from all demographics, around 71% of trafficking victims are women.<sup>7</sup> The Asia and Pacific region comprises more than two-thirds of the world's trafficking victims with more than 25 million trafficking victims.<sup>8</sup> Similarly, when it comes to sex trafficking and tourism, locations with substantial amounts of sex trafficking and child sex trafficking are also hotspots for sex tourism.

This section covers the existence of sex tourism, child sex tourism, and the use of hotels in sex trafficking. Sex tourism is found both in countries where prostitution is illegal and in countries where it is legal. However, in both cases, the sex tourism industry includes a mix of sex trafficking victims and others who have entered the sex work industry willingly. A more insidious side of sex tourism is child sex tourism, which can incur extraterritorial punishments.

### Sex Tourism

Part of what makes the intersection of sex trafficking and the tourism sector such a complicated topic is the existence of legal sex tourism. Many locations where prostitution is legal contain a thriving sex tourism industry, where tourists can go for sex shows, to hire a prostitute, etc. Sex tourism is known to happen in almost every region of the world except for Antarctica, with locations such as Thailand and the Netherlands some of the leading destinations.<sup>9</sup> Some tourism agencies even promote the sex tourism industry in locations such as Thailand and Amsterdam, despite the efforts of governments of these countries to move their image away from these perceptions.<sup>10</sup>

Regardless of the legality or popularity of sex-based tourism, sex tourism includes a range of individuals from those who enter into the practice willingly to others who are coerced or forced and are victims of sex trafficking. For example, this occurs in Amsterdam's red-light district, located close to the city center and often frequented by tourists seeking sexual or scandalous thrills. Sex work has been legal in the Netherlands for more than 20 years, and as such sex tourism has boomed. The reality is that not all sex workers within the legal sex trade are there willingly, and one source estimates that between 40% and 90% of the women in Amsterdam's red-light district are victims of sex trafficking.<sup>11</sup>

In Thailand, where prostitution has been illegal since 1960, it has been difficult for the country to shake the stereotype as a destination for sex tourists, despite efforts by the Thai government to rebrand their tourism industry. This stereotype arose during the Vietnam War when U.S. soldiers would travel to Thailand for rest and recreation breaks, and, while in Thailand, they would support the sex tourism industry. Thailand has since become a location where structural issues play a key role in the

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<sup>6</sup> Alliance 8.7, "Regional Brief for Asia and the Pacific: 2017 Global Estimates of Modern Slavery and Child Labour."

<sup>7</sup> "Global Estimates of Modern Slavery"; UN News Centre, "Report: Majority of Trafficking Victims Are Women and Girls; One-Third Children."

<sup>8</sup> Alliance 8.7, "Regional Brief for Asia and the Pacific: 2017 Global Estimates of Modern Slavery and Child Labour."

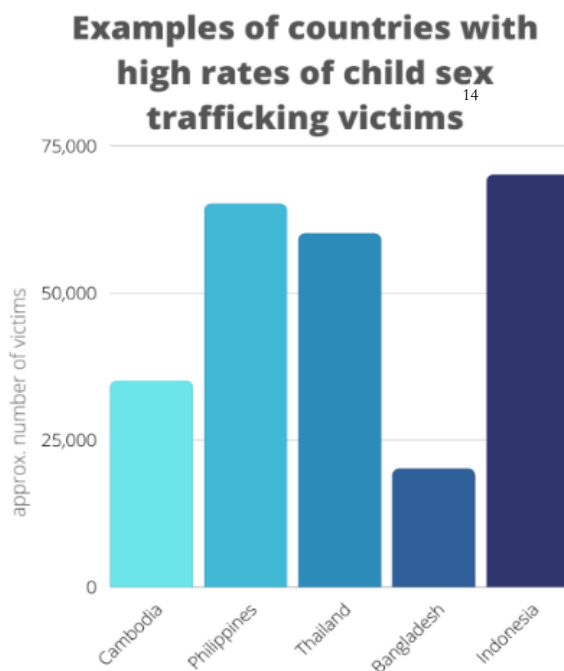
<sup>9</sup> Lusby, Lindsay A, and Victor W, "Sex Trafficking in the Tourism Industry."

<sup>10</sup> Nuttavuthisit, "Branding Thailand: Correcting the Negative Image of Sex Tourism."

<sup>11</sup> Spapens and Rijken, "The Fight against Human Trafficking in the Amsterdam Red Light District."

continuation of sex tourism. Cultural pressures for young women to repay their families, high rates of poverty, corruption and support by local politicians, and high demand from international tourists all contribute to the thriving sex tourism industry in Thailand.<sup>12</sup> Gender disparities and inequality and poverty are both well-known push factors that lead to increased numbers of women ending up in sex trafficking.

Additionally, cleaning staff in the hotel industry are more likely to face sexual harassment in the workplace. The request “I would like an additional pillow” by single male travelers, especially in North America, often signifies that that guest may try to make unwanted and inappropriate sexual advances towards the housekeeping staff.<sup>13</sup> This harassment of hotel workers, although not sex trafficking, demonstrates the additional effects that unchecked sex tourism can have on the expectations demanded of hotel staff.



Because of the murkiness of sex tourism, both legally and morally, it is important that the tourism industry take steps to address this continued and growing phenomenon. The reality is that sex tourism does not exist without the presence of sex trafficking and sexual exploitation of women and girls, even in situations where prostitution and sex work are legal. Right now, the legal system is often playing catchup when it comes to regulating sex tourism in a way that helps protect victims of trafficking. As international tourism continues to grow, more will need to be done to address this burgeoning industry by governments, hotels, and tourism practitioners to limit the negative connections between tourism and sex trafficking.

### Child Sex Tourism

While the sex tourism industry operates at the intersection of legal prostitution and sex trafficking, child sex tourism is always considered a form of sex trafficking. Globally, it is estimated that 20% of all sex trafficking victims are children, and that percentage can be larger in certain regions such as in Southeast Asia.<sup>15</sup> The sale of children for sex with tourists is a huge

<sup>12</sup> Sze Ki Cheng, “Sex Tourism: Its Social Impact on Thailand.”

<sup>13</sup> Oxfam Canada, “Tourism’s Dirty Secret: The Exploitation of Hotel Housekeepers.”

<sup>14</sup> Davy, “Regional Overview: Sexual Exploitation of Children in Southeast Asia”; Lau, “Child Prostitution in Thailand”; Office to Monitor and Combat Trafficking in Persons, “2020 Trafficking in Persons Report.”

<sup>15</sup> Davy, “Regional Overview: Sexual Exploitation of Children in Southeast Asia.”

draw with estimates that as many as 250,000 tourists each year have sex with a minor while visiting Southeast Asia alone, with up to 25% of sex tourists originating from the United States and 13% originating from Australia.<sup>16</sup> Although there is a subset of tourists who could be defined as “child sex tourists,” “traveling child sex offenders,” or “pedophile tourists,” most individuals who have sex with children while traveling participate in a variety of activities during their travels and are not traveling exclusively for the purpose of participating in child sex tourism.<sup>17</sup>

In the last several decades, the terminology has moved away from “child prostitution” and towards “child trafficking” to demonstrate that children have no choice or agency in these situations. The organization ECPAT (End Child Prostitution in Asian Tourism) changed its name to just the acronym in 2017 to reflect this shift in terminology. ECPAT is at the forefront of addressing the epidemic of child sex tourism because their 2016 *The Global Study on Sexual Exploitation of Children in Travel and Tourism* report is the first comprehensive and global report on the practice of child sexual exploitation in tourism. ECPAT’s Global Study found that designations such as “destination,” “origin,” and “transit” to describe the countries of offenders and victims are quickly becoming outdated as child sex tourism becomes more common intra-regionally. Additionally, the growth in regional and international tourism is increasing faster than changes made to child protection norms and legislation—leaving children especially vulnerable to sexual and labor exploitation in the travel and tourism sector.<sup>18</sup>

In the field of human trafficking in tourism, child sex tourism is one of the most explored topics both in academia and the nonprofit sector. Well-known

## Hotels, Sporting Events, and Human Trafficking

During the 2004 Athens Olympics, there was a 95% increase in human trafficking cases in the city of Athens.<sup>19</sup> This substantial increase in sex trafficking cases around the Olympics led to a larger focus by many organizations on the possibility of large sporting events serving as hotspots for sex trafficking. Large sporting events draw big groups of sports tourists—and specifically large groups of men. One theory espoused that the increased number of cases during these sporting events was because of this increase in the number of sports tourists and single male tourists.

Since the 2004 Olympics, there have been many movements to increase awareness around the issue of sex trafficking during sporting events such as the Olympics, World Cup, and the Super Bowl. A variety of awareness and training campaigns emerged specifically to address this issue, such as the Tri-State Coalition for Responsible Investment’s *Hotel Outreach Toolkit*.<sup>20</sup>

However, more recently, several major anti-trafficking organizations, such as Polaris, have warned that the perception of major sporting events as hotbeds for sex trafficking can serve as a distraction from the day-to-day occurrences.<sup>21</sup> The increase in sex trafficking during large sporting events is now estimated to be only 5 to 20% greater than on an average day.<sup>22</sup> The previous high rates associated with sporting events in the aughts and early 2010s are now generally attributed to the sensationalism surrounding the topic.

While there are little data to support the claims of huge increases in sex trafficking during sporting events, there is evidence of increased labor trafficking. Exploited and trafficked migrant workers who build stadiums, ball parks, and sportswear factories experience violated labor rights, and young talented athletes are at higher risk of trafficking.<sup>23</sup>

<sup>16</sup> Lusby, Lindsay A, and Victor W, “Sex Trafficking in the Tourism Industry.”

<sup>17</sup> Panko and George, “Child Sex Tourism: Exploring the Issues”; ECPAT International, “The Global Study on Sexual Exploitation of Children in Travel and Tourism 2016.”

<sup>18</sup> ECPAT International, “The Global Study on Sexual Exploitation of Children in Travel and Tourism 2016.”

<sup>19</sup> Lusby, Lindsay A, and Victor W, “Sex Trafficking in the Tourism Industry.”


<sup>20</sup> Tri-State Coalition for Responsible Investment, “Hotel Outreach Toolkit: Preventing Human Trafficking at Major Sporting Events.”

<sup>21</sup> Malo, “Is the Super Bowl Really the U.S.’s Biggest Sex Trafficking Magnet?”

<sup>22</sup> Martin and Hill, “Debunking the Myth of ‘Super Bowl Sex Trafficking.’”

<sup>23</sup> Julie Ham, “What’s the Cost of a Rumor: A Guide to Sorting out the Myths and the Facts about Sporting Events and Trafficking.”

organizations like ECPAT work with other more localized NGOs to create country and region-specific reports on sexual exploitation of children in travel and tourism (SECTT), as well as outlining interventions to reduce the prevalence of child sex tourism. Another important name in the fight against child sex tourism is The Code (short for “The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism”). The Code is a stakeholder organization that provides awareness, trainings, tools, and support to hospitality and tourism providers to protect children from SECTT.



6.5% of sex trafficking cases reported to The National Human Trafficking Hotline in 2019 were hotel- or motel-based<sup>24</sup>

### Usage of Hotels in the Sex Trade

Hotels and motels are one of the locations where sex trafficking is known to occur at higher rates. In the United States, 75% of survivors reported coming into contact with hotels at some point during their exploitation, whether while traveling, as a location of exploitation, or during their escape and rehabilitation.<sup>25</sup> Escort services often use hotels and motels as part of their business model, either where a victim stays in one hotel room with buyers cycling in and out or where a victim is delivered to a buyer’s location, which is often a hotel room.

Sex trafficking can and does happen at hotels and motels at all price points—not just cheap motels. The buyers of women at hotels and motels may be tourists or business travelers but are also often locals. Commercial hotel- and motel-based sex is frequently advertised online. Commercial sex is always considered sex trafficking if the victim is a minor or if the victim was forced or coerced into performing sex acts.<sup>26</sup>

## III. Labor Exploitation

The tourism and travel industries are by nature a global industry, which leads to increased opportunities for labor trafficking and exploitative practices, especially in regions of the world with weak labor protections and welfare opportunities. In Europe alone, it is estimated that there are 4,500 victims of labor trafficking working in the hotel industry.<sup>28</sup> Labor trafficking and exploitation affect the tourism and travel industry at higher rates than average for several distinct reasons. Many hotels use recruiters or subcontractors to fill the local needs of their hotels, such as cleaning and maintenance staff, security guards, and bar and restaurant staff. These subcontractors and recruiters may use a combination of debt bondage, extortionate recruitment fees, or visa and passport seizure to control and manipulate workers. Additionally, it is not uncommon



77% of labor trafficking in the U.S. hotel industry reported from 2007-2015 involved visas.<sup>27</sup>

<sup>24</sup> The U.S. National Human Trafficking Hotline, “2019 Data Report.”

<sup>25</sup> Anthony, “On-Ramps, Intersections, and Exit Routes.”

<sup>26</sup> Polaris, “Hotel/Motel-Based.”

<sup>27</sup> Polaris, “Human Trafficking and the Hotel Industry.”

<sup>28</sup> Oxford Brookes University et al., “COMBAT: Trafficking in Human Beings in the Hotel Industry.”

**In 2019, *The Beyond Compliance in the Hotel Sector* report found that in the UK. . .**



**76% of hotels did not disclose supply chain information**



**35% of hotels did not describe due diligence strategies to combat labor trafficking**



**Only 8% of hotels reported that workers do not pay recruitment fees or costs<sup>34</sup>**

can offer an employment opportunity that carries an increased risk of labor exploitation and trafficking, but these locations can also serve as an opportunity for gainful employment for domestic labor trafficking survivors.<sup>30</sup> Because of high turnover rates and seasonal employment, the inability to organize often opens up these workers to increased risk of exploitation.

Additionally, it is common for hotels to use recruitment agencies to fill positions. These agencies will often recruit migrant workers. Recruitment agencies are notorious for charging exorbitant fees for their services and high fees for visas to the United States or European Union, which can lead to a system of debt bondage. Most labor trafficking victims in the American hotel industry, come to the United States on visas such as the H-2B visa, which is tied to a specific employer.<sup>32</sup> Because the visa is tied directly to the employer, it can be impossible for the employees to change employers. These workers are often recruited by third- or sometimes fourth- or fifth-party recruitment agencies, with which each extra step the likelihood of trafficking and exploitation increases.<sup>33</sup>

Migrant workers are also at increased risk of labor trafficking because often times it is impossible for them to terminate their contracts at will or to organize. Additionally, migrant workers are frequently not covered by local labor protections. For example, of the hotels operating in the Gulf, only three hotel companies even mention the protection of migrant workers in their human rights disclosure.<sup>34</sup> This is even more important to note because of the high rates of undocumented and migrant workers employed by the tourism sector.

Traffickers, who are often associated with local or international organized crime, will commonly use genuine or look-a-like tourist visas and stolen passports to bring labor trafficking victims into the European Union.<sup>31</sup>

for hotels to rely on migrant and seasonal workers to help during the busiest seasons, which presents additional opportunities for exploitation.

### Hospitality Staff

The hotel industry has created thousands of jobs for women, but this work is often exploitative and dangerous. Housekeeping and cleaning staff frequently have high room quotas, work for poverty wages, are unable to organize, and sometimes are only seasonally employed.<sup>29</sup> Hotels and motels

<sup>29</sup> Oxfam Canada, “Tourism’s Dirty Secret: The Exploitation of Hotel Housekeepers.”

<sup>30</sup> Business & Human Rights Resource Centre, “Inhospitable: How Hotels in Qatar & the UAE Are Failing Migrant Workers”; Karen Schwartz, “New Report Details Exploitation of Hotel Industry Workers.”

<sup>31</sup> Europol SOC Strategic Analysis and Europol’s THB Team, “Situation Report Trafficking in Human Beings in the EU.”

<sup>32</sup> Anthony, “On-Ramps, Intersections, and Exit Routes.”

<sup>33</sup> Colleen Owens et al., “Understanding the Organization, Operation, and Victimization Process of Labor Trafficking in the United States.”

<sup>34</sup> Business & Human Rights Resource Centre, “Inhospitable: How Hotels in Qatar & the UAE Are Failing Migrant Workers.”



For example, in the United States, 17% of undocumented immigrants are estimated to be working in the hotel and leisure industry.<sup>35</sup>

A crucial step to address the issue of labor trafficking in hospitality staff would be for hotels to take concrete measures to combat labor trafficking. This would include commitments to auditing and adjusting hiring and recruitment processes, allowing labor organizing, and conducting supply chain due diligence. However, hotels are often resistant to allowing labor organizing or making commitments to ethical recruitment. This can be seen in the recent survey of hotels in the Gulf states, where only four out of 17 hotel companies interviewed demonstrated best practices on enforcing ethical recruitment and facilitating worker representation.<sup>36</sup>



## Construction Workers

In regions where tourism is growing quite rapidly, there is an increased risk that newly built hotels will rely on trafficked labor to complete the construction projects. Even in the United States, the construction of new hotels and casinos poses a risk for labor trafficking.<sup>38</sup> This risk of trafficked labor is also present in the construction of sporting stadiums and other infrastructure for use in tourism-related activities or international events such as the World Cup, Olympics, or

other international events.<sup>39</sup> This risk can be further increased in countries with weak rule of law and worker protections.

The issues related to trafficked labor in the construction and landscaping industry are often overlooked compared to other types of trafficking that take place in hotels such as labor trafficking in the housekeeping and hospitality staff or sex trafficking of women and children in hotels. Although many hotels have joined The Code or have anti-human trafficking policies relating to adult sex and child sex trafficking, very few make public disclosures or commitments to stop labor trafficking.<sup>40</sup> The hotels and tourism organizations that do offer statements about trafficking generally reference trafficking and its legality instead of focusing on the human rights aspects of the issue.<sup>41</sup>

<sup>35</sup> Colleen Owens et al., “Understanding the Organization, Operation, and Victimization Process of Labor Trafficking in the United States.”

<sup>36</sup> Business & Human Rights Resource Centre, “Inhospitable: How Hotels in Qatar & the UAE Are Failing Migrant Workers.”

<sup>37</sup> Adams and Guelbart, “Stamping Out Exploitation in Travel: Benchmarking the Travel Industry’s Progress on Fighting Human Trafficking and the Commercial Sexual Exploitation of Children.”

<sup>38</sup> Karen Schwartz, “New Report Details Exploitation of Hotel Industry Workers.”

<sup>39</sup> Hamill, “The 2022 World Cup.”

<sup>40</sup> Julie Tanner, “Corporate Strategies to Address Human Trafficking Investor Recommendations for London Olympic Sponsors and Hospitality Companies.”

<sup>41</sup> Adams and Guelbart, “Stamping Out Exploitation in Travel: Benchmarking the Travel Industry’s Progress on Fighting Human Trafficking and the Commercial Sexual Exploitation of Children.”

Despite the general lack of acknowledgment by the hospitality industry, there have been small steps taken in the fight against modern slavery in the construction of tourism infrastructure. Marriott's Serve 360 platform is often listed as a step forward. Serve 360 prescribes that all Marriott franchises provide awareness training for best hiring practices and ensure that these labor protections and hiring practices also address human rights risks in the construction of hotels.<sup>42</sup>

## Child Labor and Forced Begging in Tourism

Forced child labor in the tourism industry occurs at all levels, from minors being trafficked and used

### *A note on orphanages...*

Organizations such as The Code and Rethink Orphanages have begun warning volunteers and other tourists to avoid volunteering or touring orphanages abroad. Over 80% of children who live in residential facilities or orphanages have at least one living parent.<sup>43</sup> In some countries, orphanages will pay parents to take their children to the city for a “better life and schooling.”<sup>44</sup> Many of these orphanages are funded almost entirely by donations coming from tourists visiting or volunteering with the children and international donors.

Although not considered internationally to be a type of human trafficking, arguments have been made that orphanage trafficking falls within the legal definition of human trafficking.<sup>45</sup> Many orphanages fail to complete background checks on volunteers and allow volunteers and tourists unsupervised time with the children, which can lead to increased levels of sexual exploitation and abuse. Additionally, orphanages sometimes will force children to put on shows for volunteers and tourists to garner donations or send children out to beg for money at large tourist attraction sites. This has led to The Code forbidding all organizations that allow volunteers to directly work with orphans from joining their organization and to the Australian government designating orphanage trafficking as a part of their 2018 Modern Slavery Act.<sup>46</sup>

in construction or as housekeeping and hospitality staff to children being forced to beg at popular tourist destinations. Disabled children, children from poor economic backgrounds, refugee children, and orphans are all at high risk for exploitation and child trafficking. During the summer months (and other popular tourist seasons locally), children may be forced to beg and/or hawk goods all day because of the influx of potential new targets.<sup>47</sup> These children may not be from the same city—or in some cases, even the same country—as where they are begging and are sometimes shuffled to different tourist sites depending on the timing of local festivals and holidays, tourist high seasons, and other increased tourist activity.

Forced begging has been listed as one of the “worst forms” of child labor due to the hazardous nature of begging, which puts the safety of the child at risk.<sup>48</sup> This is further complicated by the psychological and physical abuse that children often receive from the adults exploiting them when they are unable to procure enough money while begging.<sup>49</sup> Children are often forced to beg, sell goods, or pickpocket in tourist areas, especially in the developing world because of the perception of tourists as both wealthy and as easy, unsuspecting targets.<sup>50</sup>

<sup>42</sup> Adams and Guelbart.

<sup>43</sup> Rethink Orphanages, “Orphanage Volunteering.”

<sup>44</sup> Rethink Orphanages.

<sup>45</sup> van Doore, “Paper Orphans.”

<sup>46</sup> Modern Slavery Act 2018.

<sup>47</sup> Ahmed Pjano, “Prevention of Child Exploitation in South East Europe.”

<sup>48</sup> “2019 Findings on the Worst Forms of Child Labor.”

<sup>49</sup> Geneviève Colas, “#INVISIBLES: Child Victims of Trafficking in Human Beings in France.”

<sup>50</sup> Rethink Orphanages, “Orphanage Volunteering.”

In some regions, children are also sometimes forced to work as tour guides at and around tourist destinations.<sup>51</sup> Tourists can see the child guides as both an annoyance and the equivalent of beggars at certain sites or as a helpful bonus that some guidebooks even recommend hiring.<sup>52</sup> As with many occurrences of labor exploitation, there are some children in the informal tourism sector (begging, street hawking, tour guides, etc.) who are being trafficked and forced to do these activities and others who are participating in these activities as a survival strategy. In both scenarios, the child is put in harm's way, but the dangers and exploitation are different between trafficking victims and victims of child labor.

## In the Supply Chain

Not only does labor trafficking intersect directly with the tourism and travel industries through the use of trafficked labor in hospitality staff, construction, landscaping, housekeeping, and forced child labor in the informal sector, but hotels and motels benefit from labor trafficking in their supply chain. The supply chains of hotels and motels can be extremely complex and offer little transparency as statistics bear out—for example, 76% of UK-based hotels do not disclose supply chain information.<sup>53</sup>

Increasingly, laws are being passed that mandate businesses to disclose efforts they are making to combat modern slavery in their supply chains, such as California's 2010 California Transparency in Supply Chains Act, the United Kingdom's 2015 Modern Slavery Act, and Italy's 231 Decree.<sup>54</sup> These laws affect the tourism sector at a multitude of levels, including hotels, motels, travel agencies, and other businesses within the travel industry, who are now required to demonstrate that they are taking appropriate steps to eliminate modern slavery in the supply chain.

Hotels from high-end luxury hotels to budget motels benefit from modern slavery and labor trafficking in the supply chain more generally. Of the hotels that disclose the interventions they have made to prevent labor exploitation in their supply chains, it is rare that they examine and audit the supply chain of the contractors and vendors they procure goods from.<sup>55</sup> Tea and coffee come through notoriously opaque and exploitative supply chains and often are found to be complimentary in hotel rooms and at hotel breakfast bars.<sup>56</sup> Similarly, fabrics used in linens, sheets, towels and decor in hotel rooms worldwide may be produced with modern slave labor.<sup>57</sup> To combat this, businesses in the travel and tourism sector should only make deals with vendors that are transparent and ensure the safety and fair treatment of their workers.

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<sup>51</sup> "2019 Findings on the Worst Forms of Child Labor."

<sup>52</sup> Mustafa and Abu Tayeh, "Education or Work."

<sup>53</sup> Walk Free Foundation, "Beyond Compliance in the Hotel Sector: A Review of UK Modern Slavery Act Statements."

<sup>54</sup> Archana Kotecha and James Hargrove, "Modern Slavery & The Hotel Industry: Best Practice Guidance for Franchising."

<sup>55</sup> Walk Free Foundation, "Beyond Compliance in the Hotel Sector: A Review of UK Modern Slavery Act Statements."

<sup>56</sup> "What's Behind Your Cup of Tea?"; Calaway, "There Could Be Labor Exploitation in Your Coffee Cup."

<sup>57</sup> Anthony, "On-Ramps, Intersections, and Exit Routes."

## IV. Interventions and Recommendations

Over the past several decades, the tourism industry has begun to contend with the issue of human trafficking both on an organizational level and on a governmental level. Charities, civil society organizations, and NGOs have sprouted up across the world to address human trafficking—and more specifically, human trafficking in the tourism industry. This includes organizations such as ECPAT, which began in the 1970s to combat sex tourism in Southeast Asia, and consortiums like The Code, which provide resources and trainings about sex trafficking and travel to businesses at all levels of the tourism industry—from local travel agencies to multinational hotel chains.

Interventions to combat human trafficking include trainings for aviation and hospitality workers, government initiatives and changes to the legal framework, better reporting mechanisms, and institutional changes. These interventions are the first step toward ensuring that the issues of modern slavery do not persist in the tourism and travel industry, but there is still a lot of work to be done before human trafficking is decoupled from the industry altogether.

### *Covid-19's Impact on Tourism and Trafficking*

In 2020, the Covid-19 pandemic brought most international and a significant amount of domestic tourism to a halt. Some viewed this pause in the tourism industry as an opportunity to reset some of the bad practices within the sector, including addressing issues with human trafficking. However, others have noted that this pause has also changed the landscape for sex and labor trafficking and anti-trafficking interventions in the industry.

Some changes due to the pandemic include:

- Hospitality workers' inability to work from home may increase the likelihood of debts, loss of income, and/or debt bondage<sup>58</sup>
- Increased housing insecurity in the general public may lead to increased rates of trafficking and sex trafficking<sup>59</sup>
- Increased demand for sex workers because of high levels of stress and lack of available safe location for said sex work<sup>60</sup>
- Higher risk of labor exploitation of hospitality staff as hotels/motels and tourist agencies attempt to recoup losses<sup>61</sup>

<sup>58</sup> Mekong Club, "COVID-19 and Modern Slavery Within the Hospitality Sector."

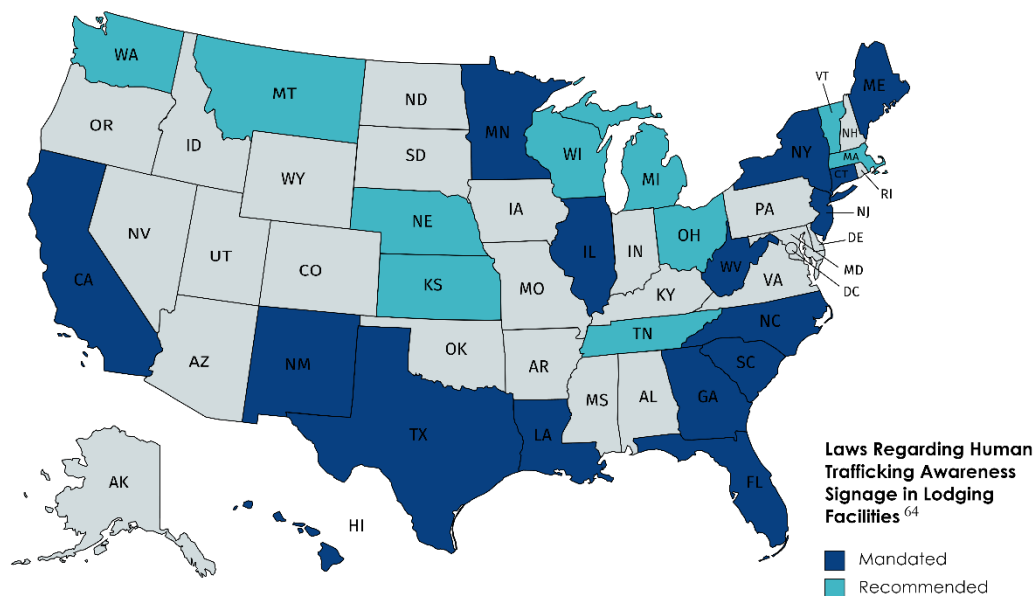
<sup>59</sup> Singer et al., "COVID-19 Prevention and Protecting Sex Workers."

<sup>60</sup> Newberry, "Coronavirus Fears Haven't Stopped the Sex Trade on Los Angeles Streets."

<sup>61</sup> Mekong Club, "COVID-19 and Modern Slavery Within the Hospitality Sector."

## Trainings for Hospitality Workers and Facilitators

Two interventions that have gained popularity are hanging up awareness posters and training sessions for hospitality and aviation staff. Posting awareness posters and signage is one of the fastest and easiest interventions that a hotel, motel, or restaurant can make, and, in many places, it is a legal requirement. In the United States, some states provide a mandatory awareness sheet that must be hung either in workers-only areas or in public-facing areas, while other states are mandated to hang signs about human trafficking awareness but they can use any signs that they choose.<sup>62</sup> In some other states, signs are only recommended, not mandatory interventions, and, in some states, there is no mandatory or recommended anti-trafficking signage for lodging or leisure facilities.



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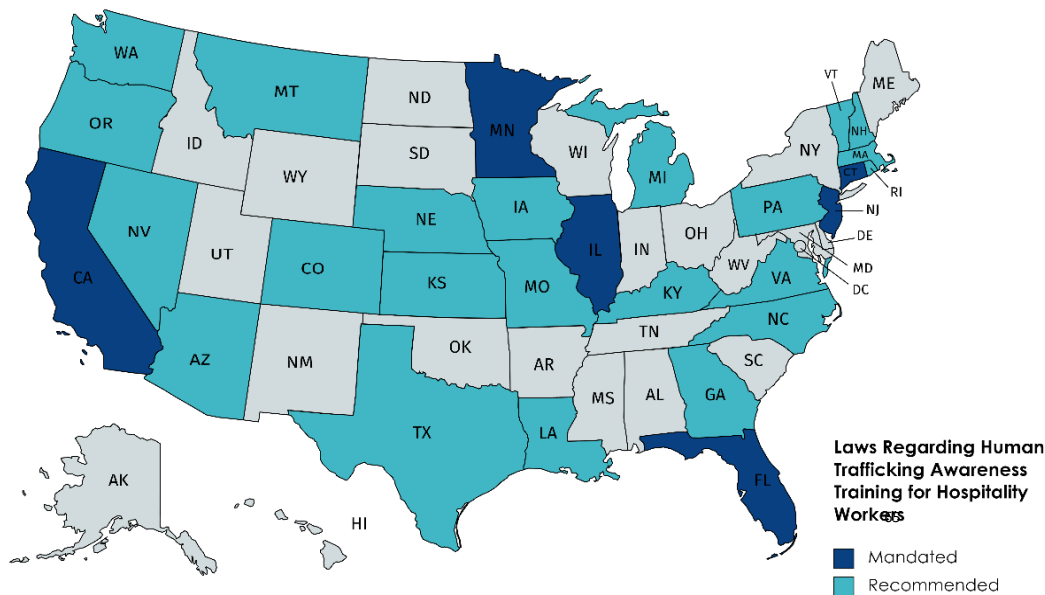
These anti-trafficking posters often contain awareness signs of human trafficking and human trafficking hotline numbers that victims are able to call, which is why it is important to have public-facing signage in places that might be frequented by human trafficking victims. Many organizations created downloadable posters that can easily be printed and used for this purpose, such as, the Department of Homeland Security's [Blue Campaign](#), and the [Human Trafficking Hotline](#). Additionally, some hotels and other travel agencies are partnering with anti-human trafficking organizations to create signage; in 2019, Marriott was the first multinational hotel chain to mandate public-facing anti-trafficking awareness signs in all of their hotels worldwide.<sup>63</sup>

<sup>62</sup> Weiss, "Unpacking Human Trafficking: A Survey of Laws in the United States Targeting Human Trafficking in the Hospitality Industry."

<sup>63</sup> Paraskevas, "Human Trafficking and Modern Slavery in Europe's Hotels."

<sup>64</sup> Weiss, "Unpacking Human Trafficking: A Survey of Laws in the United States Targeting Human Trafficking in the Hospitality Industry."

In addition to public-facing posters and worker-facing human trafficking awareness sheets, many states also mandate or recommend anti-human trafficking awareness and intervention trainings for hospitality staff at hotels and motels. While only six states offered mandated trainings at the start of 2021, other states have been working to pass mandatory training laws. Many organizations are requiring that their employees receive training on sex trafficking in the travel industry but fall short when it comes to addressing instances of labor trafficking awareness.



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Recently, several member organizations recommend and encourage their members to participate in anti-trafficking trainings. For example, The Code places training employees on children’s rights and reporting mechanisms as the second most important intervention travel and tourism adjacent businesses can do in the fight against child sex trafficking. Organizations such as the BEST Alliance offer general anti-trafficking trainings for all businesses, but they also provide specialized training sessions for hospitality workers and workers in the aviation industry because of the specific and elevated risk there for trafficking.

On top of outside organizations whose focus is to educate and train workers on human trafficking signs and how to report them, certain trade organizations in the tourism and hospitality sector also offer specialized trainings. For example, the American Association of Airport Executives provides online courses and certifications and in-person training sessions for badged airport employees and tenants. Organizations for hoteliers, such as the American Hotels and Lodging Association and the Asian American Hotel Owners Association, offer trainings, webinars, posters, and toolkits to their members on anti-trafficking. Additionally, when it comes to labor trafficking in the hospitality industry, there are also further trainings available, such as the Sustainable Hospitality Alliance’s free online [“Risks of Modern Slavery in Labour Sourcing”](#) training.

When it comes to trainings, posters, and toolkits, there are several recommendations that could be made to make these interventions more meaningful and effective. The first is that more organizations should make trainings and public-facing anti-trafficking awareness posters mandatory, especially now when in many locations there are no state-mandated trainings. Second, anti-trafficking posters, toolkits and trainings primarily currently focus mainly on sex trafficking and international trafficking. Trainings and mandated literature should also include information on labor trafficking and how that trafficking can present itself in the tourism and travel sector. Additionally, many trainings, posters, and flyers focus heavily on the risks posed to minors and child sex trafficking. These trainings must also adequately address the risks posed to adults. Finally, many anti-trafficking organizations advocate for wider reaching legislation addressing anti-trafficking trainings, which could be critically important in creating a well-informed workforce.<sup>65</sup> Businesses and practitioners in the tourism and travel agency should advocate for increased regulations and mandates when it comes to human trafficking awareness.

## National and Multilateral Interventions

Globally, many countries have taken steps to combat human trafficking, and, in some cases, governments have also taken specific steps to address human trafficking in the tourism and travel industry. Some examples of current interventions from around the world include Panama's airport exit tax, Canada's *It's a Crime* campaign, and Australia's *Smart Volunteering* campaign. Increasingly, countries are creating extraterritorial human trafficking legislation to combat traveling sex offenders and pedophile tourists. Additionally, multilateral organizations such as the United Nations and Council of Europe have created anti-trafficking initiatives that national governments can join in an effort to combat human trafficking.

The country of Panama, whose economy relies heavily on the money brought in by tourism, has instituted an airport exit tax from their largest international airport. This airport exit tax charges the equivalent of 1USD to every foreign tourist leaving from Panama's Tocumen Airport, with all of the funds raised going to Panama's Sexual Exploitation Fund, which funds rehabilitation services for victims of sex trafficking in Panama.<sup>66</sup>

Through tourism safety and advisory resources, many countries make it clear that sex tourism, and specifically child sex tourism, are completely inappropriate and, in many cases, illegal. This includes [warnings](#) from the US's Center for Disease Control and Prevention and the Department of Homeland Security's [Blue Campaign](#) or Canada's [It's a Crime](#) campaign. Additionally, since 2018, Australia has been running its [Smart Volunteering](#) program, which encourages Australian volunteers going to volunteer abroad to pick reputable volunteer programs that keep the safety and welfare of the child as the top priority. These kinds of campaigns serve to educate tourists on the dangers and implications of participating in human trafficking and illegal sex tourism while abroad before they even leave their home country.

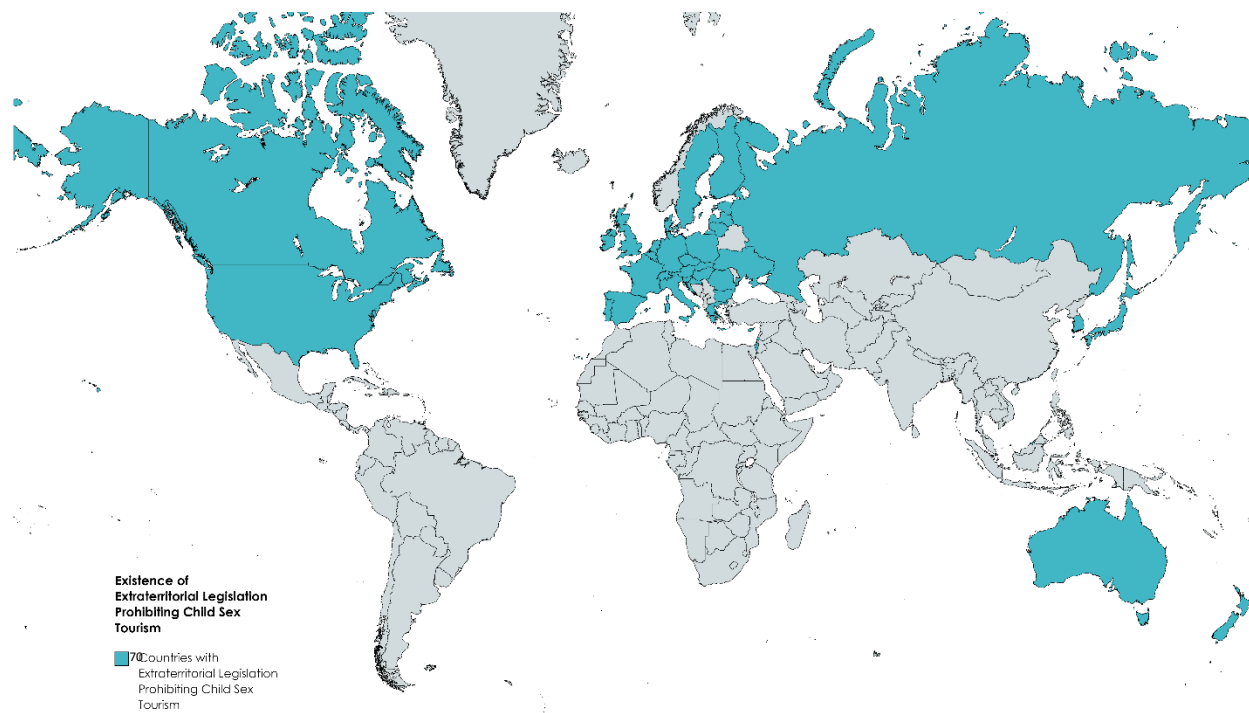
One important step that many countries have begun to take is the implementation of extraterritorial legislation prohibiting and prosecuting travel for the purpose of illegal sex tourism and child sex tourism. These laws make it possible for the home country of tourists to prosecute tourists for illegal

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<sup>65</sup> Anthony, "On-Ramps, Intersections, and Exit Routes."

<sup>66</sup> María Ibañez Beltran, "ECPAT Country Overview: Panama."

sex crimes that they committed while outside of their home country, whereas countries without this extraterritorial legislation cannot prosecute for crimes committed by their nationals outside of their borders. This includes any instances of child sex tourism and any purchasing of illegally trafficked women or men. The majority of these new laws are in countries that historically have been countries where sex tourists originate from and typically countries in the Global North.



Although these laws are a step forward in the fight against human trafficking and the illegal sex trade, they fall short in several ways. First of all, the sex tourism industry is changing, and it is more difficult to designate certain countries as the home country of the “typical offender.”<sup>67</sup> Because of this, all countries should create legislation allowing for the extraterritorial prosecution of these crimes. Additionally, in the countries that do have legislation in place, there is little to no enforcement of these laws both in the home country because of the weak international cooperation of law enforcement and in the host country because of the difficulty to implement enforcement or nonexistent extradition treaties.<sup>68</sup> This weak enforcement of extraterritorial laws demonstrates the need for better international communications and cooperation between law enforcement and the need for countries to make real commitments to anti-trafficking legislation.<sup>69</sup>

In addition to the presence of national awareness campaigns aimed at tourists and the national adoption of extraterritorial legislation, some multilateral institutions have attempted to address human trafficking, both generally and in tourism. In 2015, the United Nations adopted the 2030 Agenda for

<sup>67</sup> ECPAT International, “The Global Study on Sexual Exploitation of Children in Travel and Tourism 2016.”

<sup>68</sup> Gil Gonzalez, “Assessment of Legal Frameworks That Address Sexual Exploitation of Children in Travel and Tourism (SECTI).”

<sup>69</sup> Office to Monitor and Combat Trafficking in Persons, “2020 Trafficking in Persons Report.”

<sup>70</sup> Gil Gonzalez, “Assessment of Legal Frameworks That Address Sexual Exploitation of Children in Travel and Tourism (SECTI).”



Sustainable Development, which consists of 17 Sustainable Development Goals and 169 targets. As the goals are intersectional by nature, there are several goals that address human trafficking and several that address tourism. In an effort to achieve Target 8.7, the main target that addresses human trafficking, a group of national governments, NGOs, think tanks, and civil society organizations have come together to streamline anti-trafficking research and interventions.<sup>71</sup> Within the frameworks for interventions created for the pathfinder countries, some countries specifically address the elevated risks of human trafficking associated with tourism.<sup>72</sup>

Other interventions by multilateral organizations include the creation and adoption of treaties and conventions, which individual countries can choose to adopt. This includes the Council of Europe Convention on Action against Trafficking in Human Beings, and the United Nations' Convention on the Rights of the Child and Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children.<sup>73</sup> Encouraging countries to ratify and join these anti-trafficking conventions is a great step forward in the fight against human trafficking in the tourism and travel industry. In addition to the treaties that directly address child welfare and international commitment to anti-trafficking, there is also the United Nations World Tourism Organization's (UNWTO) Global Code of Ethics for Tourism, which attempts to protect the rights of tourists and host communities.<sup>74</sup> One important step to fight trafficking in tourism, supported by organizations such as Polaris and ECPAT, would be the conversion of the UNWTO Code of Ethics into an international convention, which would make a difference in encouraging travel, tourism, and lodging business to implement anti-trafficking policies.<sup>75</sup>

## Reporting Mechanisms

The strengthening of reporting mechanisms and increased access to reporting mechanisms through better and more reliable technology has made it easier for victims to reach out for help and for bystanders to report suspicious activities. Only 22% of calls to report human trafficking in hotels and motels are made by the victims themselves, which demonstrates that more than three-quarters of the time when a report is made by someone who either witnessed suspicious activities or interacted with the victim.<sup>76</sup>

In addition to hotlines and call centers, there are now several apps, which can be used for reporting. One example of an app-based intervention, which is especially relevant for the tourism industry, is [the Airline](#)

Human trafficking hotlines handle cases sensitively and use a victim-centered approach, so it is best to contact them first before contacting law enforcement.

In the United States:

- National Human Trafficking Resource Center (1-888-373-7888)
- BeFree Texting Helpline (233733)

Outside of the United States:

- Canada (1-833-900-1010)
- UK (08000 121 700)

EU Member States

- [Full List Here](#)

Other International Hotlines

- [Full List Here](#)

<sup>71</sup> "Goal 8 | Department of Economic and Social Affairs."

<sup>72</sup> "Pathfinder Countries."

<sup>73</sup> United Nations, Convention on the Rights of the Child; United Nations, Protocol to Prevent, Suppress and Punish Trafficking in Persons, supplementing the United Nations Convention against Transnational Organized Crime; Council of Europe Convention on Action against Trafficking in Human Beings.

<sup>74</sup> UNWTO, "Global Code of Ethics for Tourism."

<sup>75</sup> ECPAT International, "The Global Study on Sexual Exploitation of Children in Travel and Tourism 2016."

<sup>76</sup> Polaris, "Human Trafficking and the Hotel Industry"; ECPAT International, "The Global Study on Sexual Exploitation of Children in Travel and Tourism 2016."

[Ambassadors International TIP Line](#). The TIP Line allows users, either airline/airport employees or tourists, to report suspicious activities and possible instances of trafficking while traveling through airports around the world. This app is especially helpful to travelers on the move because it redirects the user to local anti-trafficking hotlines and organizations.

Another app that is useful in the fight against human trafficking in the travel and tourism industry is the [Traffick Cam](#). The Traffick Cam is a website where people can upload pictures of their hotel rooms for use in tracking and locating victims of sex trafficking. Because sex traffickers will sometimes post pictures of their victims online or in advertisements from the hotel where they are staying or working, creating a database of user-uploaded images of hotel rooms allows law enforcement to better locate these victims of human trafficking before they are moved to another location.

Bystanders and victims are more likely to report human trafficking when hotels hang up and display human trafficking awareness posters, hotlines, text lines, and apps. Some steps that could strengthen the effectiveness of reporting mechanisms in the tourism sector would be that lodging and travel-related businesses establish a company-wide response plan for their employees to guide them on best practices when it comes to reporting suspicions of human trafficking—especially if the case involves a minor.<sup>77</sup> Additionally, when it comes to the reporting mechanisms themselves, they must be able to accommodate minority language speakers and be accessible to children in order to best serve common victims of human trafficking.

## Institutional Changes

Travel, lodging, and tourism-related businesses can change their own institutional frameworks for prevention and reporting and create internal protocols that could limit human trafficking risk in the travel and tourism industry. These internal policies should not only address what actions are being taken but should also the tourism and travel industry’s increased risk for both sex and labor trafficking.

The number one action that tourism and travel businesses can take is creating, formally adopting, and, most important, enforcing an organization-wide anti-trafficking policy. These policies could use The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism and the United Nations Guiding Principles on Business and Human Rights as guidelines.<sup>78</sup> These policies should include awareness trainings for employees, establish safe mechanisms and protocol for reporting human trafficking, and public transparency and disclosures about the steps being taken to ensure that there is no human trafficking in the business models. Providing and mandating anti-trafficking awareness training to employees—regardless of whether it is required by law or not—helps to create a more effective hospitality or aviation workforce that are better able to effectively identify and report suspicious incidences.

Additionally, hotels and motels can combat human trafficking in their direct operations by hiring their employees directly whenever possible to limit the exorbitant recruitment fees that can lead to debt bondage. Hotels and motels, especially multinational hotel chains should have policies on migrant workers and the ethical recruitment of employees and include mechanisms for labor organizing in

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<sup>77</sup> Anthony, “On-Ramps, Intersections, and Exit Routes”; “The Global Study on Sexual Exploitation of Children in Travel and Tourism 2016.”

<sup>78</sup> Anthony, “On-Ramps, Intersections, and Exit Routes.”

locations where labor rights are weak or where migrant workers are unable to form or join trade unions. These steps can help to eliminate labor exploitation in the hotel and lodging industries.

Last, companies in the travel and tourism industry should ensure that outside organizations and businesses that they contract with are not participating in modern slavery. Because of the complexities in the hotel supply chains, examining the anti-trafficking policies of local vendors and subcontractors is especially important if the prevalence of human trafficking in tourism and travel is to be reduced.<sup>79</sup> In some instances, actions such as inspecting vendor policies can create a cascade of human trafficking policies to be enacted. Additionally, if companies find instances of labor trafficking among certain vendors, contracts should only be canceled as a last resort.<sup>80</sup> When contracts are immediately canceled, this can lead to increased labor exploitation and abuse and make it harder to report them in the future. Instead, companies should initially continue working with vendors while monitoring their compliance and helping with capacity-building initiatives to reduce the usage of modern slavery.

Lodging, aviation, travel, and tourism companies can proactively take steps to address human trafficking through transparency initiatives, due diligence, hiring local staff directly instead of through recruitment agencies, and providing awareness training for staff on reporting and anti-trafficking protocols.

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<sup>79</sup> Walk Free Foundation, “Beyond Compliance in the Hotel Sector: A Review of UK Modern Slavery Act Statements.”

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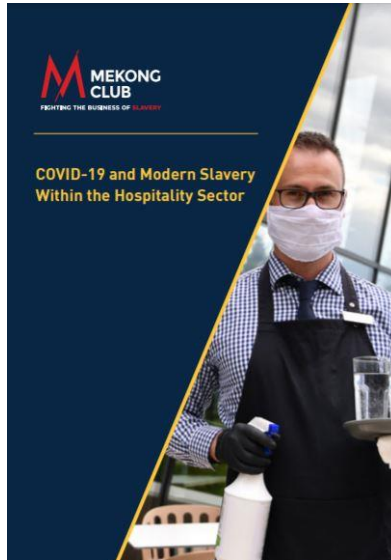


# Annex I: Curated Resources Reports on Trafficking and Tourism

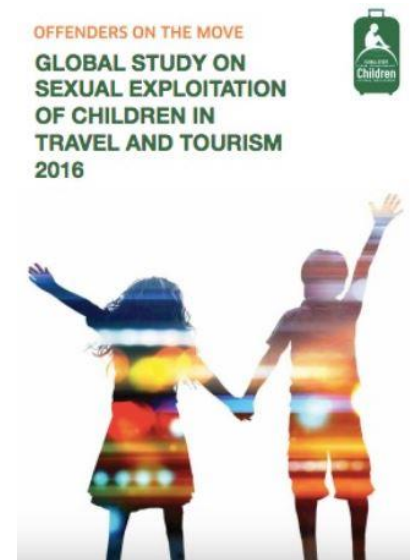
## Summary Paper on Sexual Exploitation of Children in Travel and Tourism



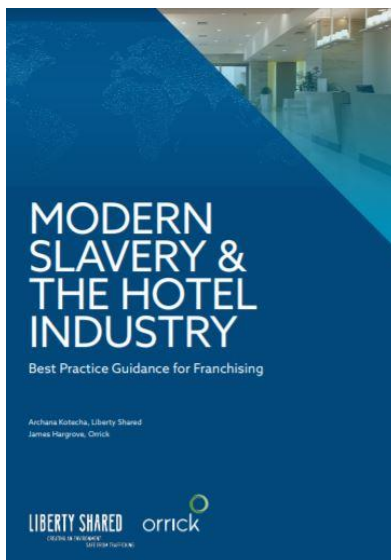
## COVID-19 and Modern Slavery Within the Hospitality Sector



## The Global Study on Sexual Exploitation of Children in Travel and Tourism 2016



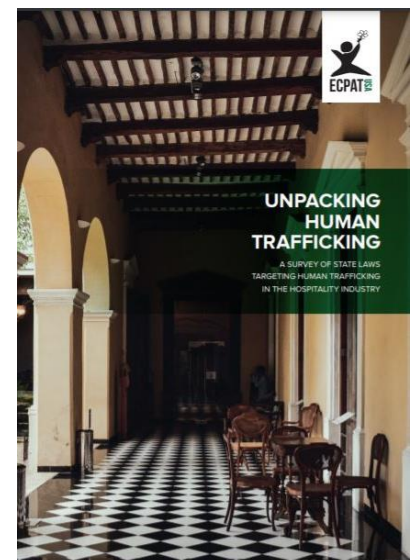
## Modern Slavery & The Hotel Industry: Best Practice Guidance for Franchising



## Inhospitable: How hotels in Qatar & the UAE are failing migrant workers



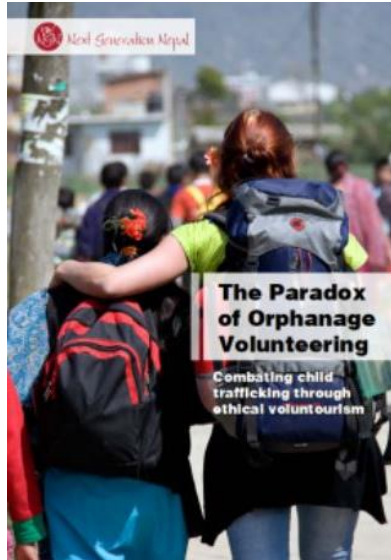
## Unpacking Human Trafficking: A Survey of State Laws Targeting Human Trafficking in The Hospitality Industry



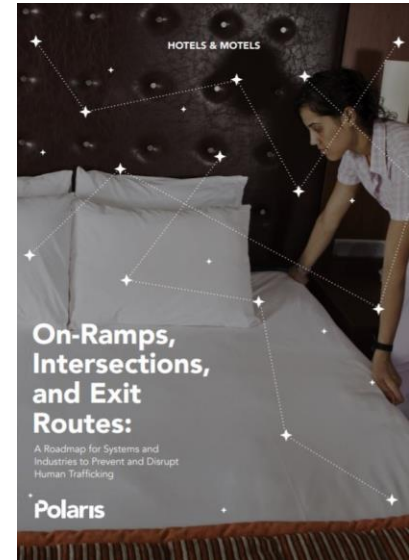
Beyond Compliance in the Hotel Sector: A Review of UK Modern Slavery Act Statements



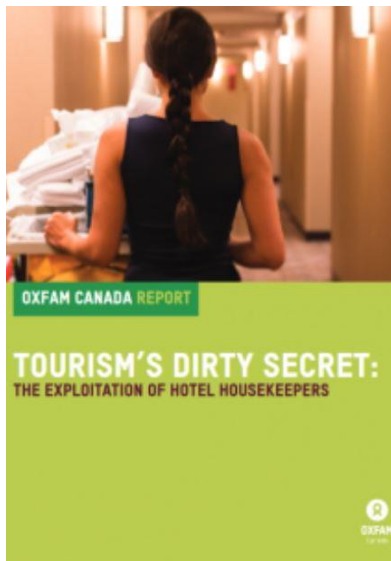
The Paradox of Orphanage Volunteering: Combating Child Trafficking Through Ethical Voluntourism



On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking



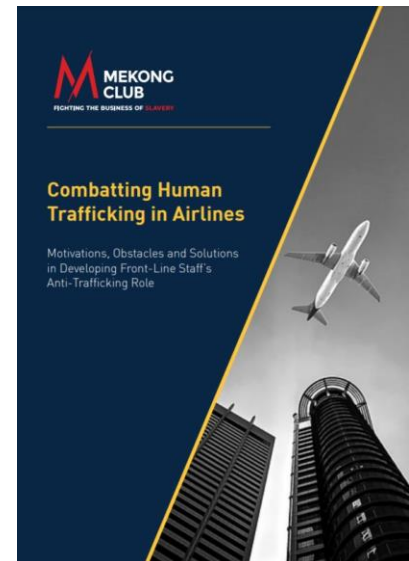
Tourism's Dirty Secret: The Exploitation of Hotel Housekeepers



Stamping Out Exploitation in Travel



Combating Human Trafficking in Airlines



## Annex II: Toolkits & Training

### Keeping Children Safe from Abuse in Tourism: Facilitator Toolkit for Tourism Sector Training



**Keeping children safe from abuse in tourism**

Facilitator toolkit for tourism sector training

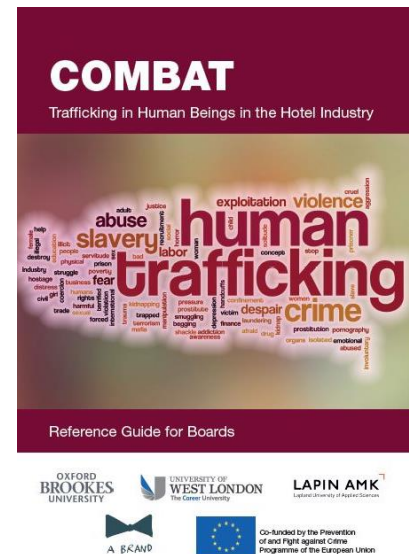


### Hotel Outreach Toolkit: Preventing Human Trafficking at Major Sporting Events



This toolkit is for community members who wish to prevent human trafficking from occurring in their own regions. The outreach outlined and resources provided focus on informing those within the hospitality industry about the risks and signs of trafficked victims on their premises.

### COMBAT: Trafficking in Human Beings in the Hotel Industry



### DHS Blue Campaign's Hospitality Toolkit



#### Who We Are

The Blue Campaign is the unified voice for the U.S. Department of Homeland Security's (DHS) efforts to combat human trafficking. Working with law enforcement, government, and non-governmental and private organizations, the Blue Campaign strives to protect the basic right of freedom and bring those who exploit human lives to justice.

#### What's Inside?

This toolkit offers tips and resources that can help you inform and educate your employees about human trafficking. It includes posters of human trafficking warning signs for four groups of employee:

- Hotel and Motel Staff
- Housekeeping, Maintenance and Room Staff
- Concierge, Bellman, Front Desk, Security and Valet Staff
- Food and Beverage Staff

These posters can be displayed in common areas of your business where employees congregate (such as staff break, laundry and maintenance rooms).

[www.dhs.gov/bluecampaign](http://www.dhs.gov/bluecampaign)

### Hospitality Industry Human Trafficking Laws in the U.S.



#### TRAINING

**7 States Mandate**

Seven states mandate human trafficking awareness training for individuals working in the lodging industry: California, Connecticut, Florida, Illinois, Iowa, Minnesota, New Jersey.

**21 States Recommend**

At least 21 states recommend human trafficking awareness training for individuals working in the lodging industry: Arizona, Colorado, Georgia, Kansas, Kentucky, Louisiana, Massachusetts, Michigan, Missouri, Montana, Nebraska, Nevada, New Hampshire, North Carolina, Oregon, Pennsylvania, Rhode Island, Texas, Vermont, Virginia, Washington.

#### SIGNAGE

**16 States Mandate**

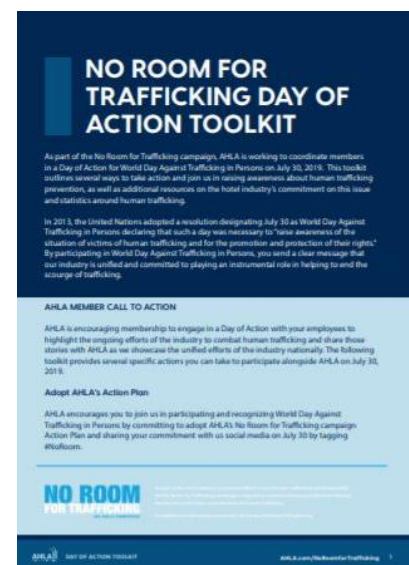
16 states mandate human trafficking awareness signage in lodging facilities: California, Connecticut, Florida, Georgia, Hawaii, Illinois, Louisiana, Maine, Minnesota, New Jersey, New Mexico, New York, North Carolina, South Carolina, Texas, West Virginia.

**12 States Recommend**

12 states recommend human trafficking awareness signage in lodging facilities: Kansas, Massachusetts, Michigan, Montana, Nebraska, New Jersey, New York, Ohio, Tennessee, Vermont, Washington, Wisconsin.

TRAINING, CIVIL, AND CRIMINAL LIABILITY LAWS BY STATE

### No Room for Trafficking Day of Action Toolkit



#### NO ROOM FOR TRAFFICKING DAY OF ACTION TOOLKIT

As part of the No Room for Trafficking campaign, AHEA is working to coordinate members in a Day of Action for World Day Against Trafficking in Persons on July 30, 2019. This toolkit outlines several ways to take action and join us in raising awareness about human trafficking prevention, as well as additional resources on the hotel industry's commitment on this issue and statistics around human trafficking.

In 2013, the United Nations adopted a resolution designating July 30 as World Day Against Trafficking in Persons, declaring that such a day was necessary to "raise awareness of the situation of victims of human trafficking and for the promotion and protection of their rights." By participating in World Day Against Trafficking in Persons, you send a clear message that you're industry, unified and committed to playing an instrumental role in helping to end the scourge of trafficking.

#### AHEA MEMBER CALL TO ACTION

AHEA is encouraging membership to engage in a Day of Action with your employees to highlight the ongoing efforts of the industry to combat human trafficking and share those stories with AHEA as we showcase the unified efforts of the industry nationally. The following toolkit provides several specific actions you can take to participate alongside AHEA on July 30, 2019.

#### Adopt AHEA's Action Plan

AHEA encourages you to join us in participating and recognizing World Day Against Trafficking in Persons by committing to adopt AHEA's No Room for Trafficking campaign Action Plan and sharing your commitment with us social media on July 30 by tagging #NoRoom.

**NO ROOM FOR TRAFFICKING**

AHEA DAY OF ACTION TOOLKIT

[www.NoRoomforTrafficking.com](http://www.NoRoomforTrafficking.com)





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