



BENCHMARKING THE TRAVEL
INDUSTRY'S PROGRESS ON
FIGHTING HUMAN TRAFFICKING
AND THE COMMERCIAL SEXUAL
EXPLOITATION OF CHILDREN.

STAMPING OUT EXPLOITATION IN TRAVEL

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STAMPING OUT EXPLOITATION IN TRAVEL: BENCHMARKING THE TRAVEL INDUSTRY'S PROGRESS ON FIGHTING HUMAN TRAFFICKING AND THE COMMERCIAL SEXUAL EXPLOITATION OF CHILDREN.

Stamping Out Exploitation in Travel is a benchmarking report that presents key findings and themes from a study of 70 companies in the travel industry on their initiatives to fight human trafficking and the commercial sexual exploitation of children. The report establishes a way to measure progress, identifies the baseline for their engagement, and highlights best practices to encourage cross-learning within the travel industry.

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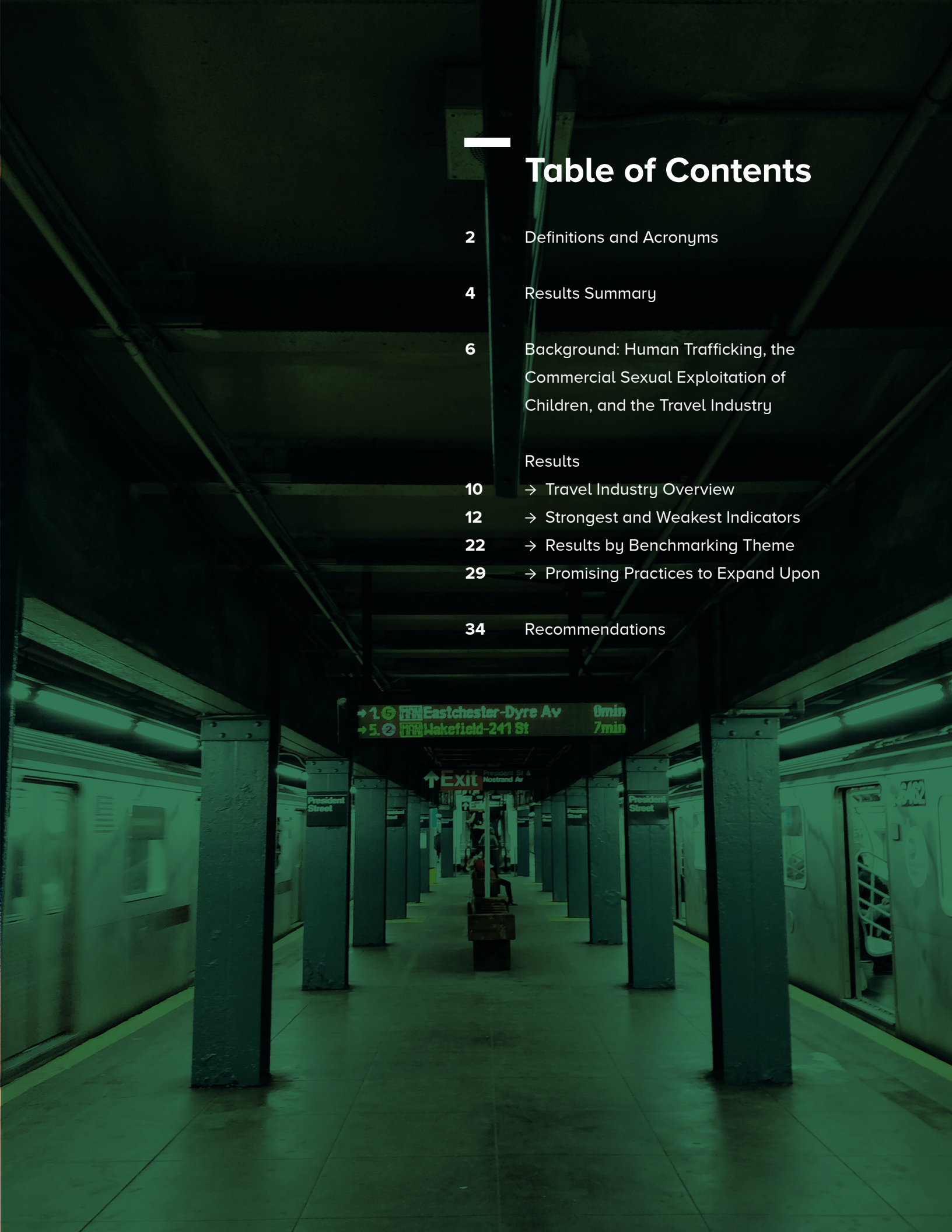
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Table of Contents

2	Definitions and Acronyms
4	Results Summary
6	Background: Human Trafficking, the Commercial Sexual Exploitation of Children, and the Travel Industry
	Results
10	→ Travel Industry Overview
12	→ Strongest and Weakest Indicators
22	→ Results by Benchmarking Theme
29	→ Promising Practices to Expand Upon
34	Recommendations



Definitions and Acronyms

Child

For the purpose of this report, a child is defined as anyone under the age of eighteen years, in accordance with Article 1 of the United Nations Convention on the Rights of the Child (1989).

Convention on the Rights of the Child / The United Nations Convention on the Rights of the Child

An international treaty that recognizes the human rights of children, defined as persons up to 18 years of age. Governments that have ratified the Convention must submit regular reports on the status of children's rights in their countries. Although the United States is a signatory to the Convention, it is the only country in the world that has not ratified the treaty.

CSAM

Child Sexual Abuse Material. Any representation by whatever means, of a child who is subjected to real or simulated explicit sexual activities or any representation of the sexual parts of a child primarily for sexual purposes. It includes photographs and recordings that are made during real criminal acts of sexual abuse of children and/or focus on the genitalia of the child.

Franchised Hospitality Sector

For the purpose of this report, franchised hospitality sector refers to companies that provide a license to a third party to conduct business under their trademark. Companies in this sector operate a brand or suite of brands with a set of standards that franchisees must maintain to be in compliance as a business authorized to use the brand. This includes gaming and/or casino companies that operate via a franchise agreement.

GRI

Global Reporting Initiative. An independent international organization that focuses on sustainability reporting.

Human Trafficking

The use of force, fraud or coercion to exploit someone for labor or commercial sex acts. A child cannot consent to be sold for sex.

LGBTQ+

Lesbian, Gay, Bisexual, Transgender, Queer or Questioning and other terms used to describe a person's sexual orientation or gender identity.

NCMEC

National Center for Missing and Exploited Children. A nonprofit corporation whose mission is to help find missing children, reduce child sexual exploitation, and prevent child victimization.

NGO

Non-Governmental Organization.

Owned and Managed Hospitality Sector

For the purpose of this report, owned and managed hospitality sector refers to single hotel properties or multiple properties that are retained by individuals, ownership companies, or managed by hotel management companies.

Suppliers / Subcontractors

Individuals, companies, or organizations with whom a company has a contractual relationship for the provision of goods or services.

The Tourism Child-Protection Code of Conduct / "The Code"

The Code is a multi-stakeholder initiative with the mission to provide awareness, tools and support to the travel and tourism industry to prevent the sexual exploitation of children. More information may be found at thecode.org.

UK Modern Slavery Act / The Modern Slavery Act 2015 / The Act

An Act to make provisions about slavery, servitude and forced or compulsory labor, and human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-slavery Commissioner; and for connected purposes. [26th March 2015]. The Act lists offenses related to slavery, human trafficking, sexual exploitation and domestic servitude following the consolidation of previous UK legislation addressing these issues. It requires that businesses in the UK subject to the Act (any organization "carrying on a business in the UK", and that has an annual turnover of £36 million or more after tax) publish and prominently post on the company website an anti-slavery statement which outlines all the steps taken by the company to prevent slavery related offenses from taking place in the company and its supply chain.

UN Global Compact

A strategic policy initiative for businesses that are committed to aligning with ten universally accepted principles for human rights, labor, environment, and anti-corruption.

BASELINE REPORT

Benchmarking The Travel Industry on Preventing and Responding to Human Trafficking and The Commercial Sexual Exploitation of Children

RESULTS SUMMARY

This study establishes a baseline to assess how 70 companies in eight travel industry sectors address and report on the protection of children from commercial sexual exploitation in their business practices. The companies included in this benchmarking were primarily those who have signed The Tourism Child-Protection Code of Conduct (“The Code”), or have recently applied to join, in recognition that their business may have high exposure or be in a unique position to address human trafficking and the commercial sexual exploitation of children. Using a benchmarking framework based on four overarching themes, companies were scored based on publicly available information, their most recent reports submitted to The Code or other human rights standards, and direct contact. The report analyzed human trafficking broadly but assigned additional points to companies that take specific measures to address the commercial sexual exploitation of children.

The Scores

Over the years, the travel industry has made important headway towards protecting children but efforts vary from company to company. As a result, the average baseline company score in this report is 38%. On average, the Aviation sector scored the highest, followed closely by Travel Management Companies. The Franchised Hospitality sector is overrepresented among top scorers. Four of the 13 companies measured achieved 70% or higher. The lowest scoring benchmarked sectors are the Sharing Economy and Associations. Companies that partner with ECPAT-USA and are members of The Code have an average score of 47%, which is 31% higher than non-Code members who average 16%.

Policies & Procedures

This analysis reveals that the industry is stepping up to fight human trafficking most robustly by adopting policies and procedures against exploitation. Over 70% of companies have an anti-human trafficking policy that is communicated to their associates and publicly available. At the same time, only 40% of companies with a policy in place reference international human rights principles, such as the right not to be subjected to slavery, servitude or forced labor, or the Convention on the Rights of the Child. Instead, most companies focus on aspects of criminality rather than an international rights framework. The majority of these companies (71%) also included a response procedure for reporting suspected cases of trafficking directly in their policies – a critical step to ensure individuals who might witness human trafficking know how to take action.

Engagement

The study looked at key steps companies are taking to address human trafficking and the commercial sexual exploitation of children, including employee training, customer engagement, and collaboration with anti-trafficking stakeholders. 60% of companies are actively engaging with law enforcement, non-governmental organizations (NGOs), and governments on the issue. Although great strides have also been made in recent years to train employees on human trafficking risks and how to respond, only one third of companies surveyed provided training to their associates in the last twelve months, and less than half explained their training initiatives directly in policy or procedural documents. When considering differences among sectors, Aviation companies provided the most training to associates in the last twelve months, and encouragingly, five major hotel brands and two hotel management companies have committed to mandatory training for their owned, managed, and/or franchised properties, representing millions of individuals trained or to be trained in the future. Half of all companies surveyed are also ensuring a human trafficking clause is included in sub-contract agreements, an important step to ensure their policies to protect children are cascaded to suppliers and their broader business network.

Transparency

When analyzing the industry's commitment to transparency, the study examined levels, quality, and availability of public reporting that included information on companies' initiatives to address human trafficking and the commercial sexual exploitation of children. The majority (66%) of companies report to an outside human rights standard, including The Code, the Global Reporting Initiative (GRI), and others. 44 of the companies are members of The Code, while the two remaining companies scoring points are not. 78% of those reporting

also make their report public, however this represents only half (51%) of the total companies scored. Further, only 19% of companies specifically disclose a public statement on the steps taken to ensure that human trafficking is not taking place in their business, similar to or where applicable in compliance with the UK Modern Slavery Act - transparency legislation that sets out a range of measures to address human trafficking.

While it is evident that the travel industry is in many cases prioritizing the protection of children in their business practices, there are often missed opportunities to fight child sex trafficking and learn from best practices across the variety of sectors in the industry. Stamping Out Exploitation in Travel establishes not only an industry baseline and a way to benchmark progress moving forward, but also provides best practice examples and recommendations to expand the work while encouraging cross-learning and collaboration.



BACKGROUND

Human Trafficking, The Commercial Sexual Exploitation of Children and The Travel Industry

Human trafficking affects over 24.9 million people across the globe – a fundamental violation of their human rights. One in four victims is a child.¹ Survivors from all ages and backgrounds often face severe trauma; physical, sexual, and emotional injuries; and lifelong health, social, educational, legal, and economic problems. Yet as a criminal industry, labor and sex trafficking continue to generate billions of US dollars² at the expense of human lives.

As a growing problem, 4.8 million individuals were forced to work in the sex industry globally in 2016. Of the victims identified, a fifth were under the age of 18, but given that child victims of commercial sexual exploitation are difficult to detect, the figure is likely much higher.³ The appeal for traffickers is obvious, as much as it is horrific: sex trafficking provides criminals with a renewable resource. Whereas drugs, stolen goods, and weapons can only be sold once, a human being can be sold over and over again. Supply and demand fuels this atrocity, and the demand for buying sex is pervasive – one in six American men admit to buying illegal commercial sex.⁴ Child sexual abuse also happens online every day, with the spread of child sexual abuse material (CSAM) rapidly increasing in recent years,⁵ and an estimated two thirds of child sex trafficking victims in the United States initially being “advertised” online and the majority being advertised both online and in-person - a way to maximize the “client” (exploiter / buyer) base and reach different demographics.⁶

While it can happen to any person, traffickers often use complex psychological tactics to target children and youth from vulnerable and underserved populations, many of whom have already experienced abuse in their lifetime. The National Center for Missing and Exploited Children reports that of the more than 23,500 endangered runaways reported in 2018, one in seven were likely victims of child sex trafficking. LGBTQ+ youth are seven times more likely to experience acts of sexual violence than their heterosexual peers, placing them at increased risk.⁷ Children in the child welfare system, particularly foster care, are also at an increased risk of human trafficking and commercial sexual exploitation.⁸

“ The private sector plays a major role in ensuring that profits do not come at the expense of children, and the travel industry is uniquely positioned to stop it.

Companies that acknowledge their role and responsibility in recognizing and preventing child sex trafficking are key to ending exploitation. Traffickers take advantage of the travel industry’s infrastructure or services, committing sexual exploitation crimes against children in hotel and motel rooms of all types, online, and while using transportation infrastructure to move between and within regions.⁹ In many cases exploiters believe the travel industry is anonymous, however travel industry associates are more likely to witness human trafficking happening in plain sight than the average person. When properly trained, they can and do report suspected incidents to the appropriate authorities.

In recent years, a number of companies of all sizes have stepped up to address the issue, embracing prevention and response initiatives from top levels of management. As of 2018, more than 60 U.S. based companies, associations, and travel affiliates have signed The Code to receive awareness, tools, and support tailored to the travel industry while committing to reporting on their initiatives. Previous ECPAT-USA studies¹⁰ have also found that half of all hotels in the U.S. have training on awareness and response to child sex trafficking, and at least 35% of those have ECPAT-USA training. Updating policies, improving socially responsible practices, and engaging people employed in the travel industry and customers in meaningful ways to protect children also builds positive recognition amongst consumers while mitigating legal, financial, and reputational risks.

Methodology

Why a Baseline Study?

The study establishes a baseline to understand the travel industry's efforts to protect children from commercial sexual exploitation in their business practices and a way to measure progress moving forward. It also sheds light on some of the most promising practices across various sectors and identifies key areas for improvement.

Using benchmarks outlined in a rubric ("the scorecard"), this assessment measures companies' initiatives according to specific criteria. The criteria also serve as a practical guide for future strategic planning for low scoring companies or those that want to engage on the issue. The report also illustrates trends within the various sectors of the travel industry and offers industries a resource that promotes continuous cross-learning and engagement. With data collected from publicly available information and reports directly submitted to The Code, this study further emphasizes the need for access to information and corporate transparency.

How the Companies Were Selected

The companies and organizations selected come from eight sectors within the travel industry. The majority are members or recent applicants to join The Code, an internationally accepted set of guidelines to protect children from sexual exploitation in travel and tourism. In recognition that their businesses may have a high exposure to child sex trafficking or be in a position to actively prevent or respond to it, companies that join this multi-stakeholder initiative receive awareness, tools, and support from ECPAT while committing to six essential steps to keep children safe:

1. Establish a policy and procedures against the sexual exploitation of children.
2. Train employees in children's rights, the prevention of sexual exploitation, and how to report suspected cases.
3. Include a clause in contracts through the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children.
4. Provide information to travelers / customers on children's rights, the prevention of sexual exploitation of children, and how to report suspected cases.
5. Support, collaborate, and engage stakeholders in the prevention of sexual exploitation of children.
6. Report annually on implementation of the six criteria.

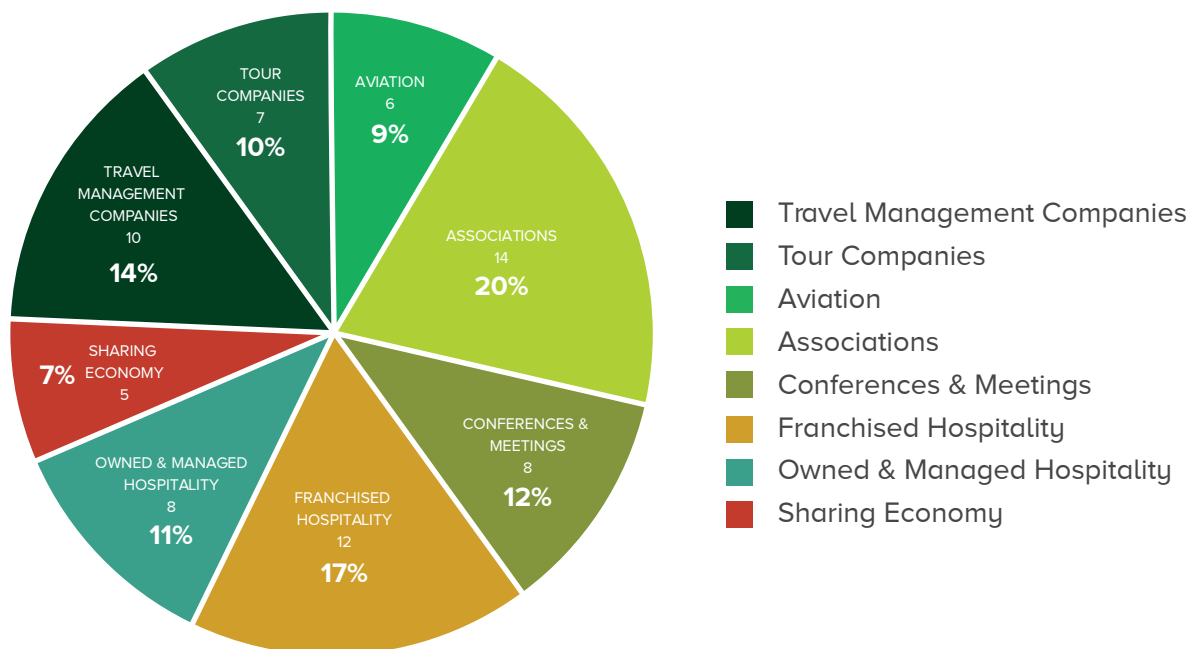
The Scope

In total, 70 companies were scored across eight sectors in the travel industry, including 60 members or applicants of The Code and an additional 10 companies that are not members of The Code.

Travel Industry Sectors included:

- Associations
- Aviation (Airlines, Airports)
- Conferences & Meeting Management
- Franchised Hospitality (Hotel Brands, Gaming/Casino)
- Owned & Managed Hospitality (Hotel Management Companies, Single Property Hotels)
- Sharing Economy (Rideshare, Home-share)
- Tour Companies
- Travel Management Companies

TRAVEL INDUSTRY SECTORS BENCHMARKED



The Benchmarking Themes and Rubric Scoring

This rubric design is based on business measures to prevent or respond to adverse impacts on the human rights of children to live free from sexual exploitation and trafficking. It is organized around four benchmarking themes:

- 1. Policies & Procedures** to address human trafficking, while also ensuring the inclusion of commercial sexual exploitation of children.
- 2. Implementation** of above policies and procedures, as well as additional actions taken to prevent or respond to child sex trafficking beyond The Code commitments.
- 3. Contracts** including the extent that child sex trafficking is addressed in relevant contracts and subcontracts.
- 4. Transparency & Reporting** to human rights standards that incorporate human trafficking and child sexual exploitation, and the availability of public information.

Within each theme, criteria are defined based on specific indicators and broken out into sub-themes to assess each company on the scope and quality to which they are meeting the indicators.

The number of indicators vary by theme, with Policies & Procedures and Implementation themes providing the most opportunities to score points. For example, within Implementation, companies were scored on the extent they met 11 indicators across five sub-themes: assessments, training, engaging customers/travelers, multi-stakeholder partnerships, and addressing demand. Franchised Hospitality companies had a higher total possible points compared to the other sectors given their operating model.

RUBRIC SCORECARD				
BENCHMARKING THEME	SUB-THEME	FRANCHISED HOSPITALITY	OWNED AND MANAGED HOSPITALITY	ALL OTHER SECTORS
Policies & Procedures	Strategic Direction	(+) 1 pt	(+) 1 pt	(+) 1 pt
	Core Policies & Procedures	(+) 4 pt	(+) 4 pt	(+) 4 pt
	Response Mechanism	(+) 2 pt	(+) 2 pt	(+) 2 pt
	Training Policies & Procedures	(+) 5 pt	(+) 3 pt	(+) 2 pt
		12	10	9
Implementation	Assessments	(+) 1 pt	(+) 1 pt	(+) 1 pt
	Training	(+) 5 pt	(+) 5 pt	(+) 5 pt
	Engaging Customers / Travelers	(+) 6 pt	(+) 6 pt	(+) 6 pt
	Multistakeholder partnerships	(+) 3 pt	(+) 3 pt	(+) 3 pt
	Addressing Supply & Demand	(+) 3 pt	(+) 3 pt	(+) 2 pt
		18	18	17
Contracts	N/A	(+) 5 pt	(+) 3 pt	(+) 3 pt
		5	3	3
Transparency & Reporting	N/A	(+) 5 pt	(+) 5 pt	(+) 5 pt
		5	5	5
POINTS POSSIBLE		40	36	34

Figure 1

Following data collection, companies were provided with their individual scorecard showing points assigned for each indicator and a report outlining the percentage achieved for each theme. Companies were asked to provide follow-up information and clarification. Many companies responded to their report by engaging with ECPAT-USA on the issues to ensure they understood the scoring criteria, industry indicators, and ways to address weak spots.

One limitation of the analysis is the inclusion of the Sharing Economy sector within the travel industry, as they have a unique business model by which employees are hired on a contract basis. Further analysis of the variation between small and medium sized companies compared with larger companies could also provide better insight into differing opportunities for engagement based on revenue.

As the first benchmarking study establishing a baseline, Stamping Out Exploitation in Travel presents aggregated data by travel industry sector. The report highlights best practice examples from some of the top-scoring companies. In order to be listed as a best practice example, a company must have achieved a baseline score of at least 15% higher than their sector's average score.

ECPAT-USA aims to replicate the study annually in order to measure progress across the industry and individually for each company as well as incorporating more stakeholders from various sectors over time.

RESULTS

Travel Industry Overview

The travel industry’s baseline score is 38%. This accounts for the total average score calculated across all four benchmarking themes.

Aviation and Travel Management Companies scored the highest on average across the industry at 62% and 59% respectively, as presented in Figure 2.

Sector Scores Across the Four Benchmarking Themes

In Figure 2, the total average score for each sector and the industry totals against the four major benchmarking themes are presented.

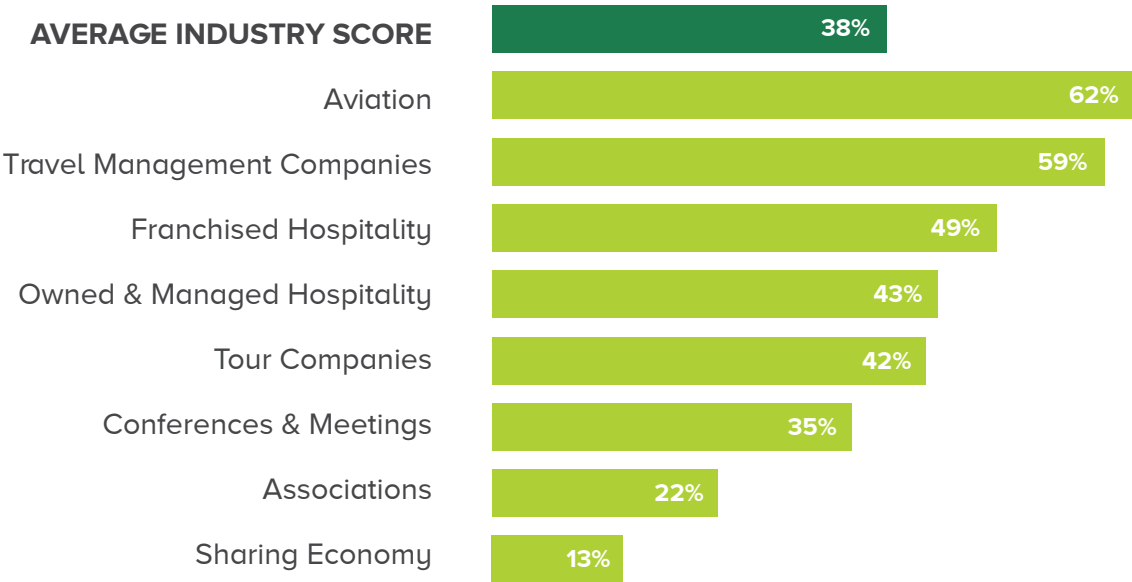


Figure 2

BENCHMARKING THEME	INDUSTRY AVERAGE
Policies & Procedures	46%
Implementation	38%
Contracts	29%
Transparency & Reporting	39%

Across the four benchmarking themes, the data reveals that the travel industry is strongest in meeting Policies & Procedures indicators (46%) compared to the other three themes. This includes having an anti-human trafficking policy, establishing a response mechanism for suspected cases, and training mandates, among other criteria. This is further explored in the following section.

TRAVEL SECTOR SCORES BY BENCHMARKING THEME

BENCHMARKING THEME	TRAVEL INDUSTRY SECTORS								
	Aviation	Associations	Conferences and Meetings	Franchised Hospitality	Owned and Managed Hospitality	Sharing Economy	Travel Management Companies	Tour Companies	Industry Average
Policies & Procedures	69%	25%	47%	70%	37%	11%	68%	44%	46%
Implementation	67%	20%	28%	52%	31%	19%	57%	32%	38%
Contracts	17%	13%	46%	22%	36%	0%	50%	52%	29%
Transparency & Reporting	60%	27%	33%	55%	34%	4%	58%	37%	39%
OVERALL SECTORS AVERAGE	62%	22%	35%	49%	43%	13%	59%	42%	38%

Figure 3

*The table above shows the average score for each of the eight travel industry sectors across the four benchmarking themes. The green and red highlighted boxes represent the top two and bottom two scores respectively, for each theme. For example, Aviation and Franchised Hospitality scored the highest for Policies & Procedures, while Associations and the Sharing Economy sectors scored the lowest across all four themes. In the last row, the overall average for the sector is displayed, while the bottom right box shows the cumulative average - 38% - representing the “travel industry baseline”.

Aviation had the strongest scores across two of four benchmarking themes: Implementation and Transparency & Reporting, as well as the industry's highest overall average score of 62%.

Travel Management Companies scored consistently high across all four benchmarking themes and had the second highest overall average score at 59%.

Franchised Hospitality scored the highest (70%) for Policies & Procedures among all sectors, while Tour Companies had the strongest score within the Contracts theme at 52%.

While Associations scored low across all themes, upon a closer look at the data, they are making important progress that can

be assessed on a company-by-company basis. This may be explained by the lack of resources available for associations, their lean staff size, and their status as non-profits. A promising area of focus is that the majority of associations have an anti-human trafficking policy in place and are transparently reporting to outside human rights bodies - important indicators explored in this report.

On average, companies that are members of The Code had a score of 47% as compared to 16% for non-Code members. This points out the important finding that Code membership can on average increase a company's score by almost 31%, highlighting the importance of collaboration between the private sector and NGOs such as ECPAT-USA.¹¹

RESULTS

Strongest and Weakest Indicators

Strongest Indicators Scored by the Travel Industry

In this section, the top five indicators scored by the travel industry are presented along with other relevant analysis. Three of the top five indicators fall within Policies & Procedures, in line with the higher industry average for this benchmarking theme.

Establishing Core Anti-Human Trafficking Policies & Procedures – 70%

- Anti-human trafficking policy established and publicly available – 70%
- Anti-human trafficking policy is communicated to all associates – 70%

“The majority (70%) of companies benchmarked have an anti-trafficking policy that is shared through The Code and/or is publicly available – a critical first step in building procedural frameworks and implementing corresponding activities to fight child sex trafficking.”

Tour companies notably scored the highest among the eight sectors achieving a 100% score for both having an established policy and communicating it to associates.

“1/3 of companies with anti-human trafficking policies do not take an explicit zero-tolerance stance.”

By communicating with associates and the public about their policy and thereby the issue, most companies also send a strong message of zero-tolerance for child sexual exploitation. Of the 70% of companies with a policy, zero-tolerance was stated 71% of the time. **On the flip side, this unfortunately means that nearly one third of companies with established policies have either missed the opportunity or are unwilling to take a tougher stance on misconduct related to human trafficking.** Across the industry as a whole, just under half (44%) have a zero-tolerance policy against human trafficking while the Tour Company sector is again overrepresented, achieving a 100% score for stating zero-tolerance.

Only 40% of companies with a policy in place reference international human rights principles, such as the right not to be subjected to slavery, servitude or forced labor, or the United Nations Convention on the Rights of the Child. With the exception of the Franchised Hospitality sector (scoring 69% for this indicator), most companies across the travel industry focus on aspects of criminality rather than the international human rights framework. This could be related to companies not engaging with human rights principles generally, but may also be due to corporate concerns that liability increases when they explicitly state specific crimes, such as human trafficking and the commercial sexual exploitation of children, in policies. It is also possible that companies prefer to use vague policies rather than using words and phrases such as “sexual crimes against children” to avoid eliciting off-putting imagery.

Best Practice Example

Maritz Global Events Policy Against Human Trafficking (Travel Management Company)

Maritz Travel Company ("Maritz") condemns all forms of human trafficking and sexual exploitation of children. The protection of children and adults from sexual exploitation is a moral imperative, and socially responsible policies and practices must reflect this principle. Maritz will strictly comply with all applicable laws and regulations regarding the prevention of sex trafficking and the commercial sexual exploitation of children, and will cooperate with law enforcement authorities to address any such instances of exploitation of which Maritz or its employees have become a party to.

No employee may:

- Use or allow the use of any of Maritz facilities, resources or equipment (including Maritz computers and networks) for the viewing, storage, distribution, promotion or other use of materials in which children or adults are depicted as engaging in any sexual act or are otherwise made an object for prurient interests;
- Enter into, on behalf of Maritz, or otherwise, any business relationships or any other arrangement with any organization which the employee has reason to believe knowingly participates in any way in sex trafficking or the commercial sexual exploitation of children; or
- Use or allow the use of images or concepts that sexually exploit children. All employees must be vigilant and immediately report to Human Resources Department, as appropriate, all situations that come to their attention in Maritz' premises or businesses where sex trafficking or the exploitation of children is suspected or appears to be intended. Under no circumstances may Maritz funds, property (including electronic devices and the Maritz' supported technology) or personnel be used to further or support human trafficking. Labor Trafficking Maritz does not recruit exploitative labor, and supports the elimination of forced and exploitative labor. Maritz will cooperate with law enforcement authorities to address any such instances of exploitation of which it becomes aware.

Definitions:

- Human Trafficking: The recruitment, harboring, transportation, provision, or obtaining of a person, through the use of force, fraud, or coercion for the purpose of exploitation.
- Labor Trafficking: The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
- Sex Trafficking: The recruitment, harboring, transportation, provision, or obtaining of a person, through the use of force, fraud, or coercion [or by a person who has not attained 18 years of age] for the purpose of a commercial sex act.
- Commercial Sexual Exploitation of Children: Sexual abuse where remuneration in cash or kind is made to the child or a third person(s). This includes through prostitution, pornography, sex tourism, and other forms of human trafficking. * As defined by Trafficking Victims Protection Act of 2000.

Reference to Child Sexual Exploitation as part of Wyndham's Human Rights Policy Statement (Franchised Hospitality)

Protection of the Rights of Children

We condemn all forms of exploitation of children. We do not recruit child labor and support the elimination of exploitive child labor. We are supportive of laws duly enacted to prevent and punish the crime of sexual exploitation of children. We will cooperate with law enforcement authorities to address any such instances of exploitation of which we become aware.

Response Procedure for Suspected Cases of Trafficking is Outlined in Policies and Procedures – 66%

In addition to making a statement to suppliers and partners, established anti-human trafficking policies can also empower employees to report suspicious activity. Including a response procedure in written policies is considered a best practice to ensure clarity and consistency. Encouragingly, companies scored high in this standard, making it the third highest scoring standard benchmarked across the travel industry. However, among the companies with an established policy, not all (66%) incorporated a procedure for reporting suspected cases of trafficking within it. Whether a response procedure is communicated to associates and other stakeholders via other outlets could not always be determined.

Best Practice Example

Caesars Entertainment’s publicly available “Commitment to Responsible Conduct” that includes a response protocol (Franchised Hospitality)

AT CAESARS ENTERTAINMENT WE ARE COMMITTED TO FIGHTING HUMAN TRAFFICKING AND ALL FORMS OF EXPLOITATION ON OUR PROPERTIES.

Human trafficking is a global problem to which no community is immune; however, it is quite complex, caused by many factors in our society, and often hidden in plain sight. It has become easier to acquire persons for trafficking with the development of Internet technology, the mobile phone and social media.

Traffickers are drawn to utilize hotels as “anonymous places” in which to conduct business: renting rooms for their trafficked victims, creating subtle advertisements of their offerings in sexual classified ads and selling victims out of hotels, as well as having victims meet buyers in nearby hotels to perform the purchased services. The ease of changing venues to keep operation anonymous combined with the desire of buyers to remain nondescript is why hotels remain a top choice for both traffickers and buyers to engage in this illegal exchange.

If you see or suspect human trafficking, or are in need of direct help yourself, please call the National Human Trafficking Resource Center hotline below.

1 (888) 373-7888 National Human Trafficking Resource Center

SMS: 233733 (Text “HELP” or “INFO”)

Hours: 24 hours, 7 days a week

Languages: over 200 languages

Website: humantraffickinghotline.org

For more Caesars information, see our Stance Against Human Trafficking and our Responsible Supplier Statement. Caesars Entertainment and its affiliates operate under a Code of Business Conduct and Ethics. Our long-standing Code of Commitment serves as our guiding principles for People Planet Play, through which we create vibrant communities where our employees are treated with respect and have satisfying careers, our guests are supported with social safeguards through Responsible Gaming, and a commitment to serve as responsible stewards of the environment.

Transparency & Reporting: Companies reporting to any outside human rights standards that include information about human trafficking and child exploitation – 64%

The high score for this indicator is primarily related to reporting by Code Members (96% or 44 of 46 companies scoring points), compared to non-Code members. The annual reporting requirement of The Code is correlated to companies regularly reviewing their human rights related initiatives, collecting and analyzing data to assess progress, and ultimately reporting on their anti-human trafficking activities. Reports to human rights standards such as the UN Global Compact, Global Reporting Initiative (GRI) and others were also reviewed for human trafficking information during the data collection.

Companies may also choose to make such reports available for public viewing through their own channels or The Code website. Of the companies that produce a report, 80% also show a strong commitment to transparency by making their report public. Across the industry as a whole, however, only 46% of the total companies scored made reports public.

Zero of the seven companies that have recently applied to The Code scored points under this section. Their involvement as a potential Code member is therefore likely to be the first time they are engaging on issues of child sexual exploitation and trafficking in a partnership arrangement that requires human rights-based reporting.

Best Practice Example

Excerpt from BCD Travel's 2019 Sustainability Report (Travel Management Company)

On an annual basis BCD Travel reports to the UN Global Compact a Sustainability Report, which is aligned to the United Nations' Global Compact, Sustainable Development Goals (SDGs), and Global Reporting Initiative (GRI) Standards.

“We actively measure and report our performance

Goal setting, measuring and reporting help us manage change. These efforts make our business activities more transparent and sustainable, especially as we consider the impact of our actions on a wide range of sustainability issues—whether positive or negative.

In accordance with the Global Reporting Initiative (GRI) and the 10 principles of the United Nations Global Compact, BCD reports on human rights, labor standards, the environment and anti-corruption. We also contribute to the Sustainable Development Goals, where Gender Equality is #5 of 17: “Achieve gender equality and empower all women and girls.”

One way we work towards this goal is based on our partnership with ECPAT. Twice as many girls than boys under 18 are victimized. We create awareness for this topic with our internal and external stakeholders.”



2018 Objective	2018 Result
Increase awareness of our support of ECPAT and The Code to protect children’s rights. Encourage all employees to participate in human trafficking online training.	Educated our staff and some of our clients on our partnership with ECPAT and how we must all play our part. We had 1,232 employees complete the human trafficking training in 2018.

“An example of workplace practice goals we set for 2019 is to continue to educate our employees, suppliers and customers on ECPAT and The Code.

Another way we measure and report our sustainability performance is by going through an annual assessment by EcoVadis, the world’s leading platform for sustainability audits for global supply chains. EcoVadis’ scorecard results and suggestions for improvement helped BCD to identify and remedy gaps and increase our sustainability performance over the years.”



Engaging Customers / Travelers: Ease of Access to Anti-Human Trafficking and Child Sexual Exploitation Information on Website – 56%

Under the Implementation theme, companies were benchmarked on their initiatives to engage customers and travelers on anti-human trafficking issues. 56% of companies provided information on their websites about human trafficking and/or the sexual exploitation of children, promoting awareness and informing key stakeholders about the issue, and what they are doing to help end it. Companies seem to understand that customers and travelers are increasingly looking to support socially responsible businesses, with the majority sharing information about their initiatives online.

Aviation, Franchised Hospitality, and Travel Management Companies achieved strong scores for this indicator compared to the other five sectors, which may be correlated to higher operating budgets for online marketing and website management.

Best Practice Example

Intro and Excerpt from Delta Air Lines News Hub Article (Airline)

Delta's News Hub Website contains numerous articles discussing human trafficking, spreading awareness about the issue, and engaging its passengers to join the fight. It further serves to shed light on the joint initiatives Delta has taken up in recent years, including training for its employees, numerous campaigns and events, and an in-flight video, to name a few.

Defending dignity: Delta takes next step at annual rally against human trafficking¹²

**When lightbulbs are switched on,
darkness is pushed away.**

On Friday, more than 800 Delta employees rallied against human trafficking with CEO Ed Bastian, celebrity activist Terry Crews; Atlanta Mayor Keisha Lance Bottoms; Bradley Myles, CEO of Polaris; and Megan Lundstrom, trafficking survivor and founder of Free Our Girls.

Held on Human Trafficking Awareness Day, the event at the Delta Flight Museum brought Delta people to the heart of the issue, giving first-person perspectives of both the problem and impact, and provided strategies to join the fight. Delta also revealed its new in-flight video that raises awareness of the crime, which can now be viewed on all Delta flights with seatback screens. Additionally, employees had the chance to see Sky magazine features and airport awareness signs Delta is rolling out in major hubs as part of the campaign. "Our mission is to bring the world together, to make the world a better place and to connect people. How we are doing that is by bringing humanity back to flying. And I can't think of a more important role of humanity than to save those who are in harm's way," Bastian said.

The conversation allowed employees to connect the roots of trafficking to hidden cultural norms that can subtly contribute to exploitation when people are not willing to speak up, become an advocate, and use their influence to help.

Best Practice Example

Maritz Global Events Uses Smartphone Apps to Combat Human Trafficking (Travel Management Company)

“Earlier this year, we launched the TraffickCam app to our employees. The app, developed by The Exchange Initiative, enables hotel guests to help combat trafficking by uploading photos of the hotel rooms they stay in when they travel. The app helps law enforcement by helping to create a database of photos that can be compared to photo evidence during investigations of suspected human trafficking.

How can the travel industry leverage TraffickCam in their efforts to end human trafficking?

Start using it yourself! You can download the app for free at the TraffickCam website, or from Apple’s App Store or Google Play. It’s simple to download, and easy to use. If everyone in the industry started using it, we’d add thousands of photos to TraffickCam’s database.

Get your company’s leadership involved. By integrating use of the app into corporate culture, we can all make a real difference in the fight to end human trafficking. For instance, our president, David Peckinpaugh, uses TraffickCam everywhere he stays, setting a powerful example for the rest of our team.

Encourage companywide adoption. How many nights a year is your team on the road? Just imagine how many photos they could help contribute to the TraffickCam database.

At Maritz Global Events, we’ve integrated TraffickCam into our training for new hires, travel directors and other employees who routinely stay at hotels.

Our employees and partners have become passionate advocates as we work together to end human trafficking. We encourage you to use TraffickCam to join us in the fight!

For more information on TraffickCam, and how you can use it to help, visit www.traffickcam.com.¹³

Weakest Indicators Scored by the Industry

In this section, the five weakest indicators scored by the travel industry are presented. Three fall within the Implementation theme while two fall under Contracts, in line with the overall industry averages for these benchmarking themes.

Assessing What Human Trafficking Crimes are Possible in the Business – 11%

As an integral part of human rights due diligence, the UN Guiding Principles on Business and Human Rights requires companies to assess their human rights impacts, which helps to uncover areas for improvement across business activities.

Within the criteria “do human rights risks or impact assessments that include human trafficking,” the study considered both the travel industry’s activities designed and carried out in-house, and those carried out externally by third party providers who conduct formal impact or risks assessments. Of the 70 companies surveyed, only eight reported conducting a human rights risks or impact assessment that included human trafficking, six of which were hotel brands.

Why should companies conduct human rights risks and impact assessments?

- To understand the prevalence, severity, and likelihood of impacts on individuals that may be suffering human rights violations while the company profits.
- To inform their initiatives designed to prevent and respond to human trafficking and the commercial sexual exploitation of children using tailored information about their business practices, which help mitigate financial, legal and reputational risks.
- To provide feedback to associates so they can take part in prevention efforts, and/or be deterred from becoming complicit to human trafficking and child sex trafficking crimes.
- To demonstrate commitment to human rights and transparency, while being responsive to the demands of socially responsible customers, travelers, and clients.

While this indicator was the weakest across the industry, it was also the subject most frequently inquired about by companies who took a keen interest in understanding why they should consider conducting human rights risk and impact assessments moving forward.

Addressing Online Supply and Demand for Child Sex Trafficking and CSAM – 10.5%

- Prohibit or block associates from accessing common human trafficking websites – 10% (Applicable to all sectors)
- Block or limit access to common human trafficking websites in properties – 11% (Applicable to Franchised Hospitality and Owned & Managed Hospitality sectors only)

Following federal and state authorities' seizure of the website Backpage.com, used to exploit children, along with the passing of two major pieces of legislation, Stop Enabling Online Sex Trafficking Act (SESTA), and Fight Online Sex Trafficking Act (FOSTA) - both occurring in April 2018 - some progress has been made to prevent sex trafficking and prosecute online offenders. However, there is no getting around the fact that the ease and anonymity of the online marketplace continues to make it far too easy for criminals to exploit children for commercial sex. Providers or "suppliers" posting advertisements like Backpage.com quickly get replaced with other classified ad websites, while newer "Sugar Daddy Sites" connect young people to older adults similar to a dating website that could put children at increased risk of sexual exploitation. Additionally, the creation and distribution of child sexual abuse material (CSAM) has become much more widespread. A report by ECPAT International and Interpol in 2018 found that more than 60% of CSAM victims were prepubescent and that the younger the child that was depicted, the more severe was the abuse. **The invention of digital technology and the Internet have completely changed the playing field for crime, making it easy for offenders to create, conceal and spread CSAM, as well as advertise their victims online.**

Despite the importance, only 10% of companies surveyed block their associates from accessing common human trafficking websites at the workplace, while just 11% of hospitality companies are block or limit consumers' access to common human trafficking websites on their properties. This is a significant - yet missed - opportunity for companies to step up and address the online demand for the sexual exploitation of children by putting controls on Internet and computer usage. If implemented, it would further serve to institutionalize zero-tolerance policies related to human trafficking, while being a relatively low cost, low-tech, way to reduce the likelihood of children being bought, sold or sexually exploited online.

Travel Purchasing - Requests for Proposals (RFPs) for Meeting and Events the Company is Hosting or Managing include Anti-Human Trafficking Clause – 17%

While companies of all sizes and structures have integrated language against human trafficking into their human rights policies, adopted formal human trafficking policies on their own, and/or included it in employee handbooks, only 17% of companies surveyed include anti-human trafficking language in their contractual arrangements, such as Requests for Proposals (RFPs) for meetings and events they are host or manage.

Including anti-trafficking language in RFPs and contracts could ensure travel purchasing further influences companies to fight human trafficking and child sexual exploitation. By making these requirements part of standard travel procurement practice, business travel and meeting professionals from all sectors can send the message that child sex trafficking is unacceptable.

Best Practice Example

CorpTrav's Standard Contract Language (Travel Management Company)

As a socially responsible company and signatory of the Tourism Child-Protection Code of Conduct (www.thecode.org, www.ecpatusa.org) CorpTrav is committed to combating commercial sexual exploitation of children. CorpTrav stands firm in our resolve to create awareness of sex trafficking of children by utilizing our professional resources in the travel and tourism industry. We ask our business partners to do the same.

Excerpt from American Airlines RFP Instructions (Airline)

RFP instructions for potential vendors/subcontractors contain the following: American is also committed to respecting human rights, including combating illegal human trafficking and child exploitation. As a prominent part of the worldwide travel industry, American conducts its business in a manner that protects human rights and the rights of children within American's sphere of influence. American has adopted responsible workplace practices and endeavors to conduct its business operations free from complicity in human rights abuses. And American expects its vendors and suppliers to do the same.

“ Only one of twelve companies within the Franchised Hospitality sector includes anti-trafficking language in their franchisee audits.

Contracting: Include Anti-Human Trafficking Clause in Franchisee Audit – 8%

Additionally, the Franchised Hospitality sector scored just 8% on a similar indicator applicable to franchisee audits, which emphasizes the opportunity available to the Franchised Hospitality sector to include language against human trafficking when auditing franchised properties. Only one of twelve companies within the Franchised Hospitality sector includes anti-trafficking language in their franchisee audits.

Results by Benchmarking Theme

POLICIES & PROCEDURES BENCHMARK

The travel industry scored 46% for the Policies & Procedures benchmark, the highest industry average achieved among the four themes.

The Franchised Hospitality and Aviation sectors scored the highest within the theme at 70% and 69% respectively, while Travel Management Companies followed closely at 68%.

The strongest and weakest indicators within the Policies & Procedures benchmark among the industry included:

STRONGEST INDICATORS

Anti-trafficking policy established and publicly available **70%**

Anti-trafficking policy communicated to associates **70%**

WEAKEST INDICATORS

Reference to international human rights principles and policies, such as the right not to be subjected to slavery, servitude or forced labor, and the rights of the child **25%**

Human trafficking awareness and response training is mandated for franchised properties (Franchised Hospitality sector only) **20%**

Over 70% of companies have an anti-human trafficking policy that has been established, communicated to their associates and is publicly available.

Over 70% of companies have an anti-human trafficking policy that has been established, communicated to their associates and is publicly available. At the same time, only 25% of all companies surveyed reference international human rights principles in their policies, such as the right not to be subjected to slavery, servitude or forced labor, or the United Nations Convention on the Rights of the Child.

Policy Improvement Area: Franchised Hospitality Mandating Training for Franchised Properties

Of the major hotel brands surveyed, only two of twelve companies (20%) mandate human trafficking awareness and response training in their policies for franchised properties. A critical opportunity to improve awareness among millions of front-line personnel is therefore being missed.

IMPLEMENTATION BENCHMARK

The travel industry scored 38% for the Implementation benchmark, mirroring the industry baseline score of 38% across all themes.

Within this theme, the Aviation sector scored the highest at 67%, while Travel Management Companies also scored well above average at 57%.

The strongest and weakest indicators within the Policies & Procedures benchmark among the industry included:

STRONGEST INDICATORS

Engaging Customers / Travelers: Ease of access to anti-human trafficking information on company's website

56%

Multi-Stakeholder Partnerships: Proven support with NGOs, law enforcement, and/or governments on human trafficking issues

51%

WEAKEST INDICATORS

Addressing Supply & Demand: Prohibit or block associates from accessing common human trafficking websites - 10% (all sectors) and Block or limit access to common human trafficking websites in properties - 10% (Franchised Hospitality sector only)

10%

Assessments: Do human rights risks or impact assessments that include human trafficking and child sexual exploitation

11%

As discussed in the *Results - Strongest and Weakest Indicators* section, companies were benchmarked on their initiatives to engage customers and travelers on anti-human trafficking issues, including by sharing information across multiple outlets (online, on the premises in written/visual format, verbally, etc.). In assessing the ease of access to and comprehensiveness of the information that is available online, companies scored particularly high for this indicator compared to the overall average score. 56% of companies provided information on their websites about human trafficking and/or the sexual exploitation of children, promoting awareness and informing key stakeholders about the issue, and what they are doing to address it.

Best Practice Example

Corptrav Management Group's Website, encouraging viewers to learn the facts, take action, and fight against human trafficking (Travel Management Company)

6 Things Individuals Can Do To Help Prevent Human Trafficking

1. Take the Slavery Footprint Survey and learn how many slaves work for you –based on the things you purchase, wear, eat, use and purchase on a daily basis.
2. Demand that your senators, representatives, and government officials make fighting slavery a top priority. Here's how you can contact them: [Senator | Representative](#)
3. Fight slavery in the checkout line by learning about and refraining from purchasing items often produced by forced labor. Learn more: [Bureau of International Labor Affairs' Toolkit for Responsible Businesses](#).
4. Help report, document, and track cases of trafficking in your community and around the globe.
5. Use your investments to fight slavery, not feed slavery. Take action to ensure slavery-free investments.
6. Get educated and learn the facts. Then, boldly use social media and opportunities in your community and sphere of influence to speak up. Follow [@TheCodeOrg](#), [@Polaris_Project](#), [@ChildSafe_Intl](#), [@UNICEFUSA](#), [@EndTraffick](#), [@ECPAT](#), [@ECPATUSA](#), [@EndItMovement](#) and others on Twitter and help spread the message.

Best Practice Example

American Airlines 5k Run / Walk at the Global Business Travel Association (GBTA) Convention Blog Post (Airline)

American Airlines and the Global Business Travel Association (GBTA) teamed up with ECPAT-USA to host the first ever 5K Run/Walk to Stop Human Trafficking at GBTA's 2018 convention in San Diego. The event was an overwhelming success, raising over \$20,000 in support of anti-trafficking efforts. In August 2019, American Airlines again encouraged participants to "go the extra mile," this time at Burnham Harbor in Chicago.

Going the Extra Mile with ECPAT¹⁴

American Airlines is proud to support ECPAT, a non-profit organization with a mission to end child exploitation and trafficking.

Recently, we teamed up with ECPAT-USA and the Global Business Travel Association (GBTA) for a 5K Run and Walk at the San Diego Harbor during the annual GBTA Convention. The event raised awareness and funds for this important social issue.

American signed ECPAT-USA's Tourism Child-Protection Code of Conduct nearly two years ago, joining a group of companies in the tourism industry committed to providing awareness, tools and support to prevent the exploitation of children.

"American Airlines and our 120,000 team members around the globe are proud to join ECPAT-USA in the fight against human trafficking and child exploitation," said American's Chairman and CEO Doug Parker. "As the world's largest airline, we have a unique role to play in combating this terrible practice."

American has had human trafficking awareness training in place for flight attendants for a number of years. And last year we rolled out similar training for our pilots and airport customer service team members. As a result, we now have trafficking awareness training in place for all of our frontline team members – nearly 60,000 people.

For more information about how your company can join ECPAT's cause, visit ecpatusa.org.



Implementation Improvement Areas

In terms of addressing supply and demand, a highly overlooked activity is prohibiting or blocking associates from accessing common human trafficking websites. Just 10% of companies met this standard (also discussed in *Results – Strongest and Weakest Indicators* section). Companies are assessed both by whether have a policy that prohibits accessing the websites as well as if they physically block access on company computers.

With an overall industry total of just 11%, human rights risks and/or impact assessments are not frequently conducted nor are they available online as public information (also discussed in *Results – Strongest and Weakest Indicators* section). This raises the question whether companies are taking steps to understand their unique risks and impacts related to child sex trafficking or instead applying a blanket approach that may not be tailored to the unique characteristics of their business. Without understanding the specific risks and impacts human trafficking can have on their sector, companies may also be less likely to prioritize initiatives to prevent the sexual exploitation and trafficking of children.

CONTRACTS BENCHMARK

The travel industry scored the lowest on the Contracts benchmarking theme at just 29%.

STRONGEST STANDARD

Anti-human trafficking clause
included in subcontracts

46%

Within the theme, the strongest standard for the travel industry is including an anti-human trafficking clause in subcontracts (46%). Although the travel industry as a whole is not excelling in the Contracts benchmarking theme, Travel Management Companies and Tour Companies stood out with high marks for this standard at 80% and 71% respectively.

WEAKEST STANDARD

Anti-human trafficking language
included in franchisee audit
(Franchised Hospitality sector only)

8%

Contract language informs partners about the company's anti-human trafficking and child exploitation policies and sets a zero-tolerance tone for suppliers. This language can be used with any supplier including travel partners, and is a particularly great tool for travel management companies, procurement teams, travel managers, legal departments, and/or meeting professionals.

Contracting Improvement Area: Franchised Hospitality Sector Franchisee Audits

As discussed in the *Results – Strongest and Weakest Indicators* section, the Franchised Hospitality sector scored just 8% when it came to including language against human trafficking during auditing of franchised properties. Only one of twelve companies within this sector is currently including the language in their franchisee audits, suggesting that more information about how to implement this criteria should be developed and widely shared amongst the sector.

Best Practice Example

BCD Travel contract clause (Travel Management Company)

Anti-slavery and human trafficking: Suppliers shall comply with BCD Travel's zero tolerance stance regarding human slavery, human trafficking and the sexual exploitation of children. All suppliers shall uphold the human rights of children including their right to a safe and secure childhood without the fear of exploitation or harm. To see the full version of the Supplier Code of Conduct and additional information on BCD Travel's Sustainability policies and procedures, please follow this link.

Contrasting to the anti-human trafficking contract clause that is being taken up by nearly half of all companies, only one company within the Franchised Hospitality sector including anti-human trafficking language.

TRANSPARENCY AND REPORTING BENCHMARK

The travel industry scored 39% for the Transparency & Reporting benchmark, mirroring the overall average score across the four themes.

STRONGEST STANDARD

Reports to any outside human rights standard that mention human trafficking and child exploitation

64%

WEAKEST STANDARD

Publicly discloses a statement on the steps taken to ensure that human trafficking is not taking place in the business

19%

The majority of companies are reporting to outside human rights standards that mention human trafficking and child exploitation, especially, The Code (as discussed in the *Results – Strongest and Weakest Indicators* section). Tour Companies and Travel Management Companies scored the highest in this section, well above the industry average, achieving 86% and 80% respectively. This is an important industry standard to ensure companies are analyzing the effectiveness of their initiatives and transparently sharing information with stakeholders.

Transparency Improvement Area – Disclosure

While many companies in the travel industry are reporting on their human rights initiatives, the industry is not readily providing public statements about the specific steps they are taking to ensure that human trafficking is not taking place in the business. This is not a legal requirement for companies that are not affected by transparency legislation aimed at changing corporate practice around human trafficking, however, providing a similar statement promotes transparency through disclosure. **There is longstanding hesitance by businesses to share human rights reports publicly, which may be due in part to a fear of associating their business with human trafficking or explicitly state their risk areas for fear of litigation. Relevant stakeholders must be prepared to address these concerns head on by outlining opportunities (for example, the operational best practices outlined throughout this report) for companies to mitigate these risks.**

An excerpt related to brand standard training from a relevant statement is presented in the *Results – Promising Practices to Expand Upon* section to showcase a promising practice meeting this standard.

RESULTS

Promising Practices to Expand Upon

Setting Strategic Goals and Targets Related to Human Trafficking and Commercial Sexual Exploitation – 39%

The analysis revealed that just 39% of companies in the travel industry are setting strategic goals and targets related to child sex trafficking. This, however, varies across sectors, with Franchised Hospitality leading the way at 83% achieved for this standard. Aviation and Travel Management Companies also scored above average, achieving 50% each.

Best Practice Example

Summary of Marriott's strategic goals and targets to fight human trafficking, including labor trafficking during construction phases of business expansion (Franchised Hospitality)

Our Efforts to Prevent Human Trafficking:

In 2017, we launched a new sustainability and social impact platform called Serve 360, with specific goals about human trafficking prevention. Under our Serve 360 platform, one of our four priorities is to Welcome All and Advance Human Rights. By 2025, we have set a goal that 100 percent of on-property associates at managed and franchised hotels will have completed our human rights awareness programme, including training on human trafficking awareness, responsible sourcing and recruitment policies and practices. We have also set a 2025 Goal to enhance or embed human rights criteria in our recruitment and sourcing policies and work with our industry to address human rights risks in the hotel construction phase.

Training on human trafficking is included in brand standards – 54% (Applicable to Franchised Hospitality sector only)

Given the volume of people employed in the hospitality industry, there is both a great responsibility and opportunity to ensure people employed in the hospitality industry have the knowledge and resources to address human trafficking and the commercial sexual exploitation of children.

“ **Clear and concise brand standards not only work to provide a consistent guest experience, but also serve as the essence of the relationship between franchisees and operating companies.**

Emphasizing human rights and the importance of anti-human trafficking awareness and response in the brand identity, and further embedding the training as a brand standard can thereby have a ripple effect in narrowing the awareness gap about human trafficking and how to disrupt it.

Once Franchised Hospitality companies endeavor to train their associates on human trafficking, more than half (64%) make that training a part of their brand standard - a testament to their efforts in recent years to move beyond small-scale initiatives and put policies into action.

Best Practice Example

Hyatt incorporates information about their brand standard training in a publicly disclosed statement on the steps taken to ensure human trafficking is not taking place in the business. From 2018-2019, over 55,000 Hyatt colleagues were required to take human trafficking training, which included both colleagues directly employed by Hyatt and colleagues employed by third parties (Franchised Hospitality)

Elimination of Human Trafficking/Modern Slavery

Given the nature of our business, we are sensitive to the existence of human trafficking and we are committed to working to establish steps that help prevent the use of Hyatt hotels for trafficking and to raise awareness concerning such exploitation wherever Hyatt hotels are located. We cooperate with law enforcement authorities in jurisdictions where Hyatt hotels are located. We also support efforts to eliminate forced labor and are publishing this statement in accordance with the UK Modern Slavery Act of 2015. We are committed to following all applicable employment related laws, including pay, overtime and work conditions, and insuring that Hyatt is a place where people can be their best.

The following are some of the ways that we express our commitment to combating human trafficking and modern slavery:

- Mandatory global human trafficking training program for managed hotels. Human trafficking training is a Hyatt brand standard and we make our training available for our franchise partners. In 2015, approximately 55,000 of our colleagues were required to take the training, which is integrated into Hyatt's onboarding process and compliance training.
- Hyatt worked in partnership with the International Tourism Partnership and our industry partners to develop the International Tourism Partnership's Position Statement on Human Trafficking.
- Hyatt blocked onsite access to several websites commonly used for human trafficking across all U.S. hotels.
- Hyatt regularly works with local law enforcement officials in preparation for and during international sporting events to create heightened awareness around human trafficking.
- Signatory to ECPAT's Code of Conduct (The Code). The Code specifically focuses on the protection of children from sexual exploitation in the travel and tourism industries.
- Hyatt supports the U.S. Department of Homeland Security (DHS) Blue Campaign – a comprehensive program to end human trafficking.
- Hyatt strictly adheres to employment laws respecting pay and hours worked and promotes respect and dignity with our suppliers through our Supplier Code of Conduct.
- Hyatt supports programs around the world that help to prepare vulnerable youth with life and hospitality skills through partnerships that include Youth Career Initiative.

Implementation: Multi-Stakeholder Partnerships – Provide support to NGOs that work on trafficking/sexual exploitation through philanthropic efforts or in-kind donations – 34%

Only through joint efforts can the global human trafficking epidemic be addressed holistically - to ensure that prevention of children affected by commercial sexual exploitation is possible, and that survivors of human trafficking get the support they need to rebuild their lives.

As a whole, the travel industry is making important progress to actively engage with relevant stakeholders towards this goal, whether it is through collaboration with human trafficking stakeholders (51% of the travel industry, as discussed in the Results by Benchmarking Theme section), or through philanthropic efforts to nonprofits and NGOs providing direct services or policy advocacy to fight human trafficking (34%).

Best Practice Example

Carlson Wagonlit Travel – Excerpt from 2018 Code Report available publicly (Travel Management Company)

- Carlson and CWT joined more than 100 community leaders from business, law enforcement, government, and non-profit agencies in the Super Bowl LII Anti-Sex Trafficking Committee – with its Director of Corporate Affairs serving as the co-chair of the Business sub-committee.
- The Legal and Compliance team of CWT continued a partnership with TrustLaw – an organization that provides pro bono legal advice to not-for-profit organizations that fight modern slavery and human trafficking, among other things, around the world.
- Carlson and Carlson Family Foundation Trustees provide leadership on the World Childhood Foundation Boards of Directors in Sweden, Brazil and the United States and our Chief Legal Officer & General Counsel is on the Board of the US entity. With this support, and funding from the Carlson Family Foundation, World Childhood recently developed and launched the Out of the Shadows Index, a ground-breaking research and benchmarking tool to measure countries' response to child sexual exploitation.
- By covering 70 percent of the world's children, this index is a crucial resource in reaching the UN SDG 16.2 – to end all forms of violence against children by 2030.
- Through financial contributions and volunteer activities, the employees of Carlson and CWT continued their strong support of the Orphaned Starfish Foundation, as it works in 27 countries to victims of trafficking and at-risk youth break their cycles of abuse and poverty through computer based education, job training and job placement assistance. The CIO of CWT joined this Board in 2017.



Recommendations

Considering the findings communicated in this report, there are key steps the private sector, governments and the public can take to combat human trafficking and sexual exploitation, specifically in relation to the travel industry.

PRIVATE SECTOR

1. Ensure Anti-Human Trafficking Policies are Robust by Referencing a Child's Right to Live Free from Sexual Exploitation, Including Zero-Tolerance Language, and Outlining Training Mandates Explicitly

Specific and clear policies that draw attention to the millions of children exploited by human traffickers, promote zero-tolerance, or include human trafficking mandates ensure that there is a focus on children as an especially vulnerable population. These policies ensure that the commitments made by a company come across loud and clear to all who may be affected by them, and signal to the general public who are increasingly leveraging their purchasing power to support socially responsible companies.

- Example: THE COMPANY condemns all forms of human trafficking and the commercial sexual exploitation of children. THE COMPANY supports every person's right to safety and security, especially children, who are most vulnerable. The protection of children from sexual exploitation is a moral imperative, and socially responsible policies and practices must reflect this principle. THE COMPANY will strictly comply with all applicable laws and regulations regarding the prevention of human trafficking and the commercial sexual exploitation of children and will cooperate with law enforcement authorities to address any such instances of exploitation of which THE COMPANY or its employees have become a party to.

2. Step Up Human Trafficking Training Efforts and Ensure Individuals Know How to Respond

Companies should mandate human trafficking awareness training that includes how to respond to suspected cases at least annually – otherwise policies condemning the human rights abuses are not followed up with concrete action. With less than half of all companies surveyed (47%) conducting human trafficking awareness training in the last 12 months for their associates, it is clear that the industry can do better.

Practical steps to implement training include the following:

- Set annual training targets as part of the company's strategic anti-human trafficking goals.
- Include training as human resources standard for new employees.
- Make access easy by providing online resources that complement the training, for example, a link to the response procedure for suspected cases.

3. Hold Other Business Associates Accountable: Cascade Existing Anti-Human Trafficking Policies to Contractors and Suppliers

Considering the human trafficking epidemic globally - over 40 million people estimated in modern human slavery - there is no question as to whether there are child victims across the value chain. Once anti-human trafficking policies are set, the travel industry should address the sexual exploitation and trafficking of children across other aspects of their business operations to ensure the obligations of contractors and suppliers are in line with the fundamental principles set forth by the company.

What to do:

- Include anti-human trafficking clause in RFPs for meeting and events the company is hosting or managing.
 - Example: Suppliers shall comply with COMPANY's zero-tolerance stance regarding human trafficking and the sexual exploitation of children.

4. Walk the Walk: Hold Franchised Properties Accountable to the Same Human Trafficking Training Standards as the Company by Including Mandates in Policies (Franchised Hospitality)

Once training modalities are established for the company headquarters and owned or managed properties, franchised brands should require training for all associates (including franchised properties) on the risks and response to human trafficking. Given that half of all Franchised Hospitality sector companies include training as part of their Human Resources (HR) standards, these companies can extend HR standards to franchisees by incorporating language in franchise agreements, engage with properties via intranet and media communication, require training in various formats (e-learning, in-person, at brand conferences), and audit the implementation.

5. Address Online Supply and Demand: Limit Access to Common Sex Trafficking Websites

As discussed in the *Strongest and Weakest Indicators* section, websites where sex is advertised for sale can create outlets that facilitate child sexual exploitation, as perpetrators often find child and adolescent trafficking victims online. Additionally, the creation and distribution of child sexual abuse material has become much more widespread making it easy for offenders to create, conceal, and spread this material. Taking measures to address supply and demand sends a strong message to perpetrators who may try to access criminal websites, in line with a zero-tolerance policy.

Companies need to be aware that:

- Commercial sexual exploitation of children occurs online and in person, and is often facilitated through commonly available websites accessed through a company's WiFi.
- Technology can further be used to protect the company's assets, such as computers, mobile phones, and servers from being used to consume CSAM.

- Both customers of the travel industry and employees can be exploiters, whether through the purchasing, viewing, or sharing of CSAM or by accessing common human trafficking websites to find and exploit victims.

Companies should:

- Block common websites that facilitate the buying and selling of sex, acknowledging the potential for human trafficking and the commercial sexual exploitation of children.
- Ensure that their ISP is blocking and filtering CSAM from their Internet servers.
- Monitor Internet activity on servers and ensure that patrons and employees are not using the company's WiFi to view spread or search for CSAM.
- Check that ad exchange companies used can share exactly which sites the company's ads are being posted on, confirming that advertising dollars are not unintentionally funding CSAM sites.
- Ensure zero-tolerance human trafficking policies include zero-tolerance for using company property (laptops, computers, etc.) for the online consumption (viewing, sharing, or storing) of CSAM or to facilitate human trafficking.

6. Transparently Report on Strategic Goals and Targets, Training, and Other Anti-Human Trafficking Activities

In order to understand whether anti-human trafficking policies and procedures are effective, the travel industry needs to measure performance through a standardized reporting process. The Code currently offers an annual reporting format that is taken up by many companies, however, nearly half – 46% – of the industry surveyed is not reporting at all. This is in stark contrast to the push from responsible investor companies urging the private sector to communicate progress on their human rights initiatives, and the fact that transparency can further support businesses relations with stakeholders.¹⁵ A best practice example of reporting to an outside human rights standard is also shared in the *Results – Strongest and Weakest Indicators* section.

GOVERNMENT

1. Pass laws that require companies to train people employed in the travel industry on human trafficking and commercial sexual exploitation of children, with consultation and resources from NGOs working on the issue.
2. Pass transparency legislation that explicitly includes child sexual exploitation language. Governments outside the United States, most notably in the UK with the Modern Slavery Act, have passed transparency legislation that requires companies to report on their efforts to combat human trafficking, including child labor. The United States introduced similar legislation called the Business Supply Chain Transparency on Trafficking and Slavery Act. This legislation, introduced in the U.S. House of Representatives in 2015, would require certain businesses to report annually on steps they had taken to address modern slavery and trafficking. ECPAT-USA works to ensure legislation includes explicit requirements for reporting on child sex trafficking, which is often overlooked. Additionally, transparency legislation cannot stop at targeting companies that provide goods (products) but must also require certain companies that provide services, such as hotels, to report.
3. Allocate funds for nonprofit organizations that are engaging in anti-human trafficking awareness, training and private sector engagement. Nonprofit organizations are leading the way in combating child sex trafficking by working with the private sector. By creating training materials and giving guidance about how to recognize and respond to a crime, nonprofits are fulfilling an important role that governments must support. Governments must allocate funds to the organizations working in this area, who have expertise in and commitment to the issue.

4. Require that suppliers contracted for travel and events have policies and training on child sexual exploitation. It is crucial that governments and contractors alike state a common repudiation and zero-tolerance policy of sexual exploitation of children. When governments engage in contractual relationships with travel companies, whether for hosting events or booking other travel services, they must seek out suppliers that have zero-tolerance policies and training related to the sexual exploitation of children. If this is not already in place, the contract must require that companies implement policies and training before the government travel or function takes place.

THE PUBLIC

1. Choose responsible travel companies and use your purchasing power while traveling to make a difference. Many hotel chains, travel management companies, and are members of ECPAT's Tourism Child-Protection Code of Conduct.
2. Donate your hotel and reward points to protect children. Currently, Hilton, Marriott, and Wyndham have a program available to donate directly to ECPAT-USA (more information can be found online at: ecpat-usa.org/donate-points)
3. Get Informed: Know the Signs and Report Human Trafficking. The ECPAT-USA Child Trafficking Travel Indicators card is available online can be used on your phone or computer for easy reference when traveling. If you see something suspicious, make a report to management or call the National Human Trafficking Hotline: 1 (888) 373-7888.



Endnotes

¹Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (2017). *International Labour Organization (ILO), and the Walk Free Foundation* in partnership with the *International Organization for Migration (IOM)*. Retrieved from: https://www.ilo.org/global/publications/books/WCMS_575479/lang--en/index.htm

²International Labour Organization estimated in 2014 that two thirds of the estimated total of US\$ 150 billion, or US\$ 99 billion, came from commercial sexual exploitation, while another US\$ 51 billion resulted from forced economic exploitation, including domestic work, agriculture and other economic activities.

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⁹On-Ramps, Intersections and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking. (2018). *Polaris*. Retrieved from: <https://polarisproject.org/sites/default/files/A%20Roadmap%20for%20Systems%20and%20Industries%20to%20Prevent%20and%20Disrupt%20Human%20Trafficking.pdf>

¹⁰No Vacancy for Child Sex Trafficking. (2017). ECPAT-USA

¹¹ECPAT-USA notes that increasing the sample size of non-Code members may affect these findings, which is a limitation to the study. Further analysis and comparison of scores, by theme and controlling for Code membership is needed in the future.

¹²Retrieved from: <https://news.delta.com/defending-dignity-delta-takes-next-step-annual-rally-against-human-trafficking>

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¹⁴Retrieved from American Airlines Navigator, Nov 2018 Issue: <https://www.americanairlinesnavigator.com/Home/Nov-2018/Making-a-Difference-in-the-World>

¹⁵T. Bansal. (2013). Talking the Human Rights Walk: Nestle's Experience Assessing Human Rights Impacts in its Business Activities. *The Danish Institute for Human Rights*. http://www.nestle.com/asset-library/documents/library/documents/corporate_social_responsibility/nestle-hria-white-paper.pdf

Protecting every child's
human right to grow up free
from the threat of sexual
exploitation and trafficking.



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