

HOTELS & MOTELS

On-Ramps, Intersections, and Exit Routes:

A Roadmap for Systems and
Industries to Prevent and Disrupt
Human Trafficking

Polaris

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Introduction

Harold D’Souza hardly seemed like an obvious candidate for a five-figure bank loan. He had only just arrived from India, with a wife, two young boys, and a job offer that turned out to be fraudulent. Yet somehow, with just a few signatures on a few dotted lines, Harold walked out the door of a bank with what would have been a small fortune had he been allowed to access it. Of course, he wasn’t. Every dime of that money went to the man who actually arranged for the loan – the trafficker. This was the same man who brought Harold to the United States with the promise of a high-paying professional job and instead forced him to work in a restaurant and live in a virtual prison of debt and desperation. Exactly how the trafficker managed to secure a loan of tens of thousands of dollars in the name of a newly arrived migrant worker with no verifiable source of income remains a mystery to Harold. Clearly though, it was not dumb luck. The trafficker knew exactly how to work within and around a highly regulated and legitimate industry – banking – to maximize the profit he made on Harold and his family. It was all part of his business plan.

The man whose lies and manipulations robbed Harold of his freedom was not unique to his field. A successful trafficker, like any successful entrepreneur, begins with a business plan built on a platform of established business models and best practices. Over time, that plan is chiseled to perfection as the trafficker learns new skills and tests out innovative new ways to monetize the exploitation of human beings.

As with any enterprise, the business plan of a human trafficking venture is not built in a vacuum but rather exists within an ecosystem or matrix, depending on and intersecting with a range of legitimate industries and systems – cultural, governmental, environmental. Examples are abundant. Traffickers use banks to store their earnings and buses to move their victims around; hotel rooms are integral to the operations of some sex traffickers, social media is a vital recruitment trawling ground for others.

This report takes a magnifying glass to such private-sector intersections. The details matter. The more that is known

about the business plans of human trafficking, the more possible it becomes to prevent and disrupt the crime and help survivors find freedom. The insights here are gleaned from those in a position to understand the nuances of each business intersection point – the survivors who lived the experience. They are not definitive scientific conclusions but rather valuable baseline narratives that can spark further exploration and collaboration from other sectors.

Each set of insights is followed by detailed recommendations for turning them into action, industry by industry. Like the insights and information that precede them, these recommendations are also not intended to be definitive. They are a beginning; an invitation. What we have learned is only as valuable as the partners who join us in making the recommendations a reality – and by offering more of their own.

This report builds upon Polaris’s 2017 report, [The Typology of Modern Slavery](#), which analyzed data, gleaned from nearly 10 years of operating the National Human Trafficking Hotline, to show that human trafficking in the United States consists of 25 distinct business models. For each, the Typology report illuminated the basic operational plan - the demographics of both victims and traffickers, and how victims are recruited and controlled.

This report focuses on the private and public-private sector because fighting human trafficking will require participation by business and industry partners with resources at a comparable scale.

The sectors explored in this report – **the financial services industry, social media, transportation industry, hotels & motels, housing & homelessness systems, and health care** – are not the only private businesses that intersect with human trafficking. Nor are they “to

blame” in some way for human trafficking. Indeed, as you will read, many stakeholders in each of these systems and industries are already doing innovative work or making powerful commitments to becoming part of the solution.

Clearly, engagement from the private sector alone is not enough. Child welfare agencies, schools and teachers, the criminal justice system, and local, state, and federal government actors are the proverbial tip of the spear, essential to the fight against human trafficking.

But human trafficking is a \$150 billion global industry that robs 25 million people around the world of their freedom. This report focuses on the private and public-private sector because fighting human trafficking will require participation by business and industry partners with resources at a comparable scale to the size of the problem. Participation, in this context, is not a euphemism for making donations to groups that fight human trafficking. The fight against human trafficking requires not just passive support but actual, active commitment and effort on the part of businesses that unwittingly, but regularly intersect with traffickers, victims, and survivors.

The information about how each of these systems and industries are exploited by traffickers as part of their business plans comes from extensive surveys of, and focus groups with, survivors of all types of human trafficking, as well as from the National Human Trafficking Hotline. Those who participated in this work, and in the sometimes painful process of sharing their own stories, did so not to point fingers, but rather to point out opportunities. We are grateful beyond measure to those with the strength to voluntarily speak their truth, again and again, in hopes of keeping others from suffering.

They did so because they know it is possible. Tanya Street lived it. As a recent high-school graduate, Tanya was vulnerable to the machinations of a pimp who showered her with love and attention, then turned her out on the street programmed to believe she was worthless, invisible, unlovable, without him. Most of the doctors at her local health care clinic simply reinforced his brainwashing. Repeatedly, she showed up with urinary tract infections that had her literally doubled over in pain. She felt frowned upon, disapproved of. No

one in the emergency room asked her why this kept happening, if maybe she would like some help beyond antibiotics. She wonders what would have happened if just once during those visits, someone had asked her the right question, or offered her information about getting help or getting out. She wonders how much sooner she would have found her voice, started her life. She wonders what pain she might have avoided.

Harold too knows that if someone at that bank, long ago, had done something a little differently, perhaps everything else would have been different and his family could have avoided some of the pain, fear, and trauma they live with to this day.

If human trafficking is a business, requiring intense planning and depending on other businesses and partners to flourish, so too must the fight against trafficking be a collective undertaking.

Today, Harold and Tanya have been honorably appointed to the United States Advisory Council on Human Trafficking. They share their experiences because they believe others truly can learn from them, and systemic change can be achieved. But they cannot be everywhere, talking to everyone, in every hospital emergency room, bus terminal, at every hotel front desk, truck stop parking lot, or monitoring the millions of social media conversations that fly through the ether at any given time. What Harold, Tanya, and all the survivors who contributed to this project have done is recognize the value of mapping the intersections where human trafficking meets legitimate businesses and systems. In doing so, they have staked out new territory, recognizing that if human trafficking is a business, requiring intense planning and depending on other businesses and partners to flourish, so too must the fight against trafficking be a collective undertaking that is painstakingly plotted and thoughtfully implemented, in partnership with the businesses that unwittingly make it possible.

The Typology of Modern Slavery

A Summary

In March 2017, Polaris released the ground-breaking report, [The Typology of Modern Slavery](#), which classified the 25 distinct types of human trafficking business models occurring in the United States. The following information includes a short description or definition of each type of trafficking as well as updated statistics on cases and potential victims learned about from the National Human Trafficking Hotline through December 31, 2017. The cases below are based off of analysis of 40,000+ cases of potential human trafficking and 11,000+ cases of potential labor exploitation. The following cases only represent the cases that occurred in the United States and where the type of trafficking or labor exploitation was known. This is not a comprehensive report on the scale or scope of human trafficking within the United States. These statistics may be subject to change. Please see the Typology report and the methodology section of this report for further context.

Type	Definition	DEC. 2007 - DEC. 2017	JAN. 2015 - DEC. 2017
		Number of Cases	Number of Potential Victims
Agriculture & Animal Husbandry (Type: Labor Trafficking)	A farming business in which potential victims are exploited for their labor in growing/maintaining crops, cultivating soil, or rearing animals.	556 (HT)	609 (HT)
		1,761 (LE)	844 (LE)
Arts, Sports, & Entertainment (Type: Labor Trafficking)	Potential victims are exploited for their labor in amateur, scholastic, or professional athletics, modeling, or performing arts (including adults in exotic dancing).	135 (HT)	102 (HT)
		40 (LE)	10 (LE)
Bars, Strip Clubs, & Cantinas (Type: Sex & Labor Trafficking)	This category comprises establishments that front as legitimate bars and clubs, selling alcohol while exploiting victims for sex and labor behind the scenes.	992 (HT)	601 (HT)
Carnivals (Type: Labor Trafficking)	Potential victims are exploited for their labor in operating rides, games, and food stands.	59 (HT)	28 (HT)
		80 (LE)	27 (LE)
Commercial Cleaning Services (Type: Labor Trafficking)	Potential victims are exploited for their labor in janitorial/cleaning services performed in private households, office buildings, and other commercial/public properties.	128 (HT)	101 (HT)
		362 (LE)	79 (LE)
Construction (Type: Labor Trafficking)	Potential victims are exploited for their labor in carpentry, masonry, painting, roofing, etc.	202 (HT)	157 (HT)
		458 (LE)	183 (LE)
Domestic Work (Type: Labor Trafficking)	An industry where an individual works for one specific household/family providing personal household tasks, cleaning, child care, or adult caretaking, often living on-site with the family.	1,437 (HT)	753 (HT)
		487 (LE)	202 (LE)
Escort Services (Type: Sex Trafficking)	Commercial sex acts that primarily occur at temporary indoor locations. Includes: hotel-based operations, internet ads, and out-calls to buyers.	6,418 (HT)	4,555 (HT)
Factories & Manufacturing (Type: Labor Trafficking)	Potential victims are exploited for their labor in food processing, clothing/shoe manufacturing, factories producing electronic devices, vehicles, and more.	99 (HT)	77 (HT)
		222 (LE)	54 (LE)
Forestry & Logging (Type: Labor Trafficking)	Potential victims are exploited for their labor as tree farm workers, reforestation planters, loggers, and workers maintaining woodland areas.	57 (HT)	27 (HT)
		173 (LE)	77 (LE)

HT = Human Trafficking | LE = Labor Exploitation¹

Type	Definition	Number of Cases	Number of Potential Victims
Health & Beauty Services (Type: Labor Trafficking)	Potential victims are exploited for their labor in businesses such as nail salons, hair salons, acupuncture businesses, etc.	345 (HT)	122 (HT)
		140 (LE)	46 (LE)
Health Care (Type: Labor Trafficking)	Potential victims are primarily exploited for their labor in residential nursing homes, occupational health facilities, or as home health aides.	64 (HT)	53 (HT)
		70 (LE)	29 (LE)
Hospitality (Type: Labor Trafficking)	Potential victims are exploited for their labor as hotel housekeepers, front desk attendants, bell staff, etc.	151 (HT)	133 (HT)
		585 (LE)	349 (LE)
Illicit Activities (Type: Sex & Labor Trafficking)	A potential victim is forced to provide labor or services to contribute to an illegal/illicit business operation such as drug selling, drug smuggling, drug production, financial scams, gang activity, etc. Potential victims are also often forced into commercial sex acts in addition to this labor.	297 (HT)	294 (HT)
Illicit Massage Businesses (Type: Sex & Labor Trafficking)	Primary business of sex and labor trafficking is concealed under the façade of legitimate spa services.	3,736 (HT)	1,253 (HT)
Landscaping (Type: Labor Trafficking)	Potential victims are exploited for their labor in gardening, maintaining public or private grounds, or within nurseries.	147 (HT)	112 (HT)
		749 (LE)	250 (LE)
Outdoor Solicitation (Type: Sex Trafficking)	Potential victims are forced to find commercial sex buyers in outdoor locations such as on "tracks"/"strolls," or at truck stops.	1,983 (HT)	1,150 (HT)
Peddling & Begging (Type: Labor Trafficking)	Potential victims are expected to beg for "donations," or sell small items such as candy, at a stationary, often outdoor locations.	602 (HT)	327 (HT)
		61 (LE)	28 (LE)
Personal Sexual Servitude (Type: Sex Trafficking)	A potential victim is forced to provide sex acts to one/ specific person(s) (oftentimes in a chronic and ongoing situation) in exchange for something of value. The controller and the "buyer" are usually the same person. (See also: Survival Sex , in the Glossary)	587 (HT)	362 (HT)
Pornography (Type: Sex Trafficking)	Pre-recorded sexually explicit videos & images, including child pornography. This can include informally distributed pornographic material, or commercial sex through a formal pornography company. •Note: This type should not be confused with interactive webcam shows. (See Remote Interactive Sexual Acts)	1,107 (HT)	516 (HT)
Recreational Facilities (Type: Labor Trafficking)	Potential victims are exploited for their labor in amusement/theme parks, summer camps, golf courses, and community swimming pools.	44 (HT)	33 (HT)
		265 (LE)	92 (LE)
Remote Interactive Sexual Acts (Type: Sex Trafficking)	Live-streamed, interactive, simulated sex acts/shows. •Note: This type should not be confused with pre-recorded sexually explicit videos & images. (See Pornography)	146 (HT)	119 (HT)
Residential Sex Trafficking (Type: Sex Trafficking)	In-call commercial sex occurring at a non-commercial residential location.	1,800 (HT)	1,665 (HT)
Restaurants & Food Services (Type: Labor Trafficking)	Potential victims are exploited for their labor as servers, bussers, dishwashers, cooks, etc.	595 (HT)	274 (HT)
		1,340 (LE)	392 (LE)
Traveling Sales Crews (Type: Labor Trafficking)	Potential victims travel in groups to various cities/states selling items such as magazines door-to-door.	686 (HT)	356 (HT)
		96 (LE)	40 (LE)

HT = Human Trafficking | LE = Labor Exploitation¹

Systemic Change Matrix

A strategic approach to ending human trafficking includes understanding the ways each of these systems enables or intersects with potential traffickers or victims. This matrix depicts the 25 types of human trafficking in the United States, cross-referenced with eight highlighted systems and industries, six of which are discussed in-depth in this report. Each system and industry can be activated to help disrupt and prevent the crime in unique and impactful ways.

	 Financial Services Industry	 Hotels & Motels	 Housing & Homelessness Systems	 Social Media	 Temporary Work Visas	 Transportation	 Business Regulatory Systems	 Health Care
Escort Services	●	●	●	●		●		●
Illicit Massage Businesses	●		●	●	●	●	●	
Outdoor Solicitation		●	●	●		●		●
Residential Sex Trafficking	●		●			●		●
Domestic Work	●		●	●	●	●		●
Bars, Strip Clubs, & Cantinas	●	●	●	●		●	●	●
Pornography	●			●		●	●	●
Traveling Sales Crews	●	●	●	●		●	●	●
Restaurants & Food Service	●		●	●	●	●	●	●
Peddling & Begging			●					
Agriculture & Animal Husbandry	●			●	●	●	●	●
Personal Sexual Servitude			●	●				●
Health & Beauty Services	●		●		●	●	●	●
Construction	●		●		●		●	●
Hospitality	●	●			●		●	
Landscaping	●				●	●	●	●
Illicit Activities	●		●			●		●
Arts, Sports & Entertainment	●			●	●	●	●	●
Commercial Cleaning Services	●	●	●		●		●	
Factories & Manufacturing	●		●		●		●	●
Remote Interactive Sexual Acts	●		●	●				
Carnivals	●				●	●	●	●
Forestry & Logging	●				●	●	●	●
Health Care	●		●		●		●	●
Recreational Facilities	●	●			●		●	

Methodology

Hotline Data

This report includes data from the U.S. National Human Trafficking Hotline. The National Hotline is not a research-oriented program. Instead, the Polaris staff who operate the hotline are focused on helping potential victims of trafficking access critical support and services to get help and stay safe. While advocates use detailed protocols to assess for indicators of human trafficking, they adapt their phrasing and scope of questions in response to each individual's answers and the circumstances of the call, text message, or chat signal. Beyond this trafficking assessment, potential victims and third parties reporting these situations are not asked a set of standardized questions and only provide information that they feel comfortable sharing with Polaris's staff to get the help they need. Additionally, asking certain questions during some signals may not be appropriate or possible due to the context of the call. For example, when Hotline staff receive calls from potential victims in crisis situations with limited time to reach out for help, staff focus on the caller's safety and assisting with urgent needs such as emergency shelter or law enforcement assistance, and not on detailed information about the victim's trafficking experience.

As such, the data points in this report represent only what those contacting the National Hotline chose to disclose. The number of survivors or potential human trafficking cases with a particular attribute would likely have been significantly higher if Polaris staff had systematically asked a standardized set of questions to each individual contacting the Hotline.

Since awareness of both human trafficking and the existence of a national victim service hotline is still limited, this data set should be interpreted as a limited sample of actual victim or trafficking case data, rather than a representation of all existent victims or cases of human trafficking. The information reported by the National Hotline is only able to represent who has access to and knowledge of the Hotline, who has the means to reach out, and who is more likely to self-identify as a potential victim or some-

one in need of assistance. The data reported by Polaris should not be compared to the findings of more rigorous academic studies or prevalence estimates.

A Note about Language:

Polaris recognizes that survivors of human trafficking identify in many ways which can be deeply personal to the individual. Throughout this report, we tend to use the terms 'victim' and 'survivor' fairly interchangeably.

Polaris staff operating the National Human Trafficking Hotline do not investigate reports made by individuals contacting the Hotline and cannot verify the accuracy of the information reported. Therefore, this report uses the term "potential victim" when referring to those individuals learned about on the Hotline, who, through a Hotline trafficking assessment, meet the definition of an individual who has experienced sex or labor trafficking.

This report references data from the National Hotline using two distinct timeframes. The data referencing **cases** is for the timeframe of December 7, 2007 - December 31, 2017. The data referencing **unique potential victim profiles** is for the timeframe of January 1, 2015 - December 31, 2017. Polaris did not begin logging victim profiles until January 1, 2015. Therefore, historic data from before January 1, 2015, is not yet available.

Cases of Potential Human Trafficking

(December 7, 2007 - December 31, 2017)

Polaris began operating and collecting data on potential cases of human trafficking and labor exploitation from the National Human Trafficking Hotline as of December 7, 2007. Polaris defines a “case” of human trafficking² as an individual situation of trafficking which could include one or multiple potential victims. Data on the case level includes, but is not limited to, form of trafficking (e.g. sex vs. labor), the type of trafficking (as defined in the Typology of Modern Slavery³), venue location, or geographic location of trafficking, etc. These are the data points that will have the timeframe of December 7, 2007 - December 31, 2017.

Individual Potential Victim Profiles

(January 1, 2015 - December 31, 2017)

On January 1, 2015, Polaris began logging individual potential victim profiles, for each unique potential victim learned about through trafficking and labor exploitation related-signals to the National Hotline. Data on an individual potential victim profile can include, but is not limited to, demographic information such as current age, adult/minor status, gender, type of work visa (if applicable), and country of origin. These records can also include detailed information on the potential victim’s experience during the potential trafficking or exploitation such as age at entry, methods of abuse endured, recruitment tactics used, recruitment location, relationship of victim to controller(s) and recruiter(s), risk factors/vulnerabilities present before the trafficking situation, and more. Polaris did not have direct contact with all victims represented in this data set. Third parties reporting information about a victim often did not have information about some details of the situation they were reporting. Each case of human trafficking or labor exploitation could identify multiple unique poten-

tial victims, or the signalers may not have had enough information to identify any individual potential victims in the situation.⁴ These are the data points that will have the timeframe of January 1, 2015 - December 31, 2017.

Polaris Survivor Survey

During the time period of **August 22, 2017 - September 18, 2017**, Polaris sought human trafficking survivor participants for a paid online survey entitled “*Trafficking Survivor Experiences with Systems & Industries*.” The survey, available in both English and Spanish, was nationally distributed to over two dozen non-governmental organizations (NGOs) which either directly serve victims and survivors of human trafficking, or organize survivor leadership. Although some of the individual NGOs which Polaris worked with to distribute the survey may specialize or exclusively interface with survivors of specific demographics or types of trafficking (e.g. some organizations only serve sex trafficking survivors, some organizations mainly serve foreign nationals, etc.), the survey was sent to a diverse range of NGOs representing many geographies, survivor demographics, and types of trafficking.

The survey was open to any adult who self-identified as a victim or survivor of sex or labor trafficking. Survey participants were not asked for any kind of confirmation of victim status. The completion of the survey was also completely voluntary, and survivors were compensated for their time. Therefore, the survey was not anonymous. Polaris collected personal contact information in order to send payment.

The survey resulted in **127 individual survivor respondents**.

For all 127 survey participants, basic demographics and information on what type of human trafficking they experienced was collected. See Figures 1.0 - 1.5

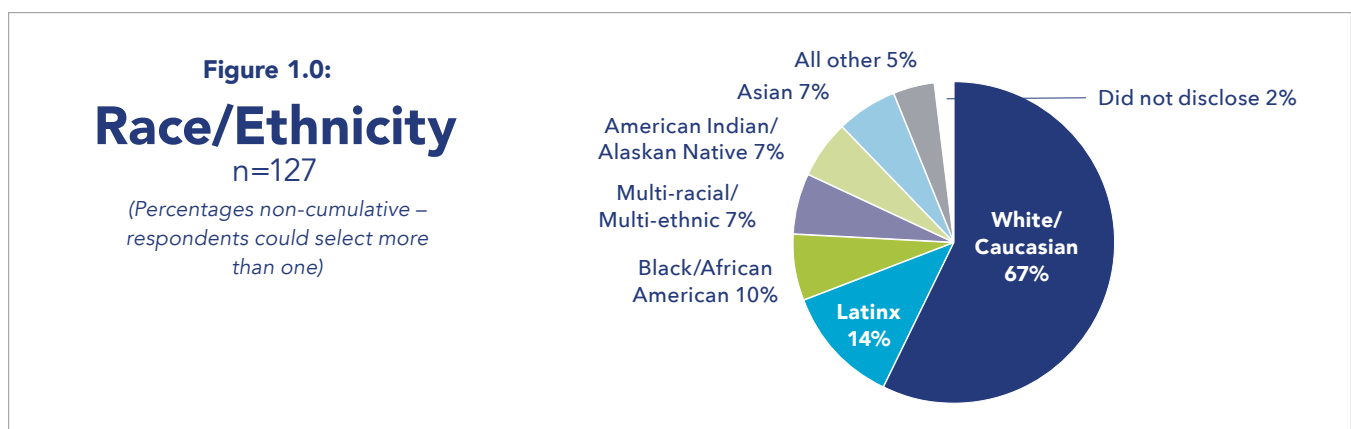


Figure 1.1:
Gender

n=127

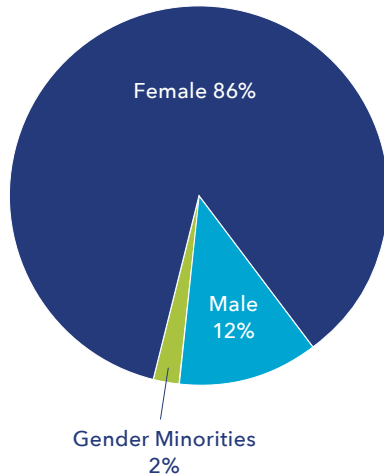


Figure 1.2:
Age at trafficking entry

n=127

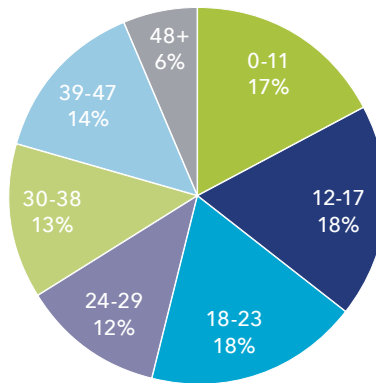


Figure 1.3:
Immigration Status

n=126*

*One respondent did not answer.

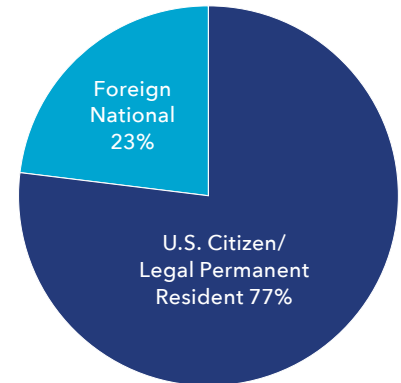
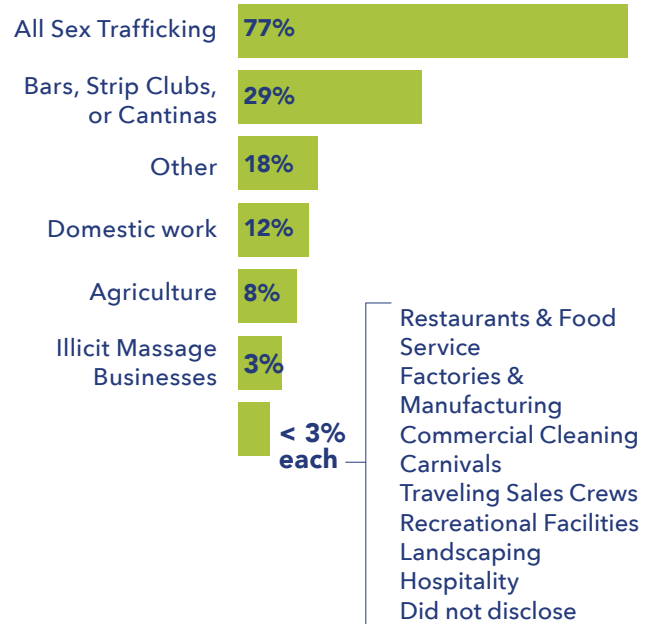


Figure 1.4:
Types of Trafficking
n=127

All Sex Trafficking	77% (98)
Bars, Strip Clubs, & Cantinas	29% (37)
Other	18% (23)
Domestic Work	12% (15)
Agriculture & Animal Husbandry	8% (10)
Illicit Massage Businesses	3% (4)
Restaurants & Food Service	< 3% ⁵
Commercial Cleaning	< 3%
Factories & Manufacturing	< 3%
Carnivals	< 3%
Hospitality	< 3%
Landscaping	< 3%
Traveling Sales Crews	< 3%
Recreational Facilities	< 3%
Not Specified	< 3%

Figure 1.5:
Types of Trafficking
n=127



Data is non-cumulative. Survey participants could select multiple options.

After the demographic questions, the survey walked respondents through separate sections dedicated to the systems and industries addressed in this report: the financial services industry, social media, transportation, hotels & motels, housing & homelessness systems, and health care.⁶

Each of these sections began with a “screening question” asked of all respondents to assess whether or not they, (or their traffickers in some cases) had any inter-

action or access to the system/industry pertaining to that section. Each screening question also provided some necessary definitions, common examples, and/or framing context to clarify the intent of each section. If respondents answered “Yes” or “Not Sure,” the survey advanced them to that section’s set of survey questions. If respondents answered “No,” the survey skipped that section altogether and navigated them to the next system/industry’s screening question. An example screening question is below:

Example Screening Question:

Trafficking Survivor Experiences with Systems & Industries

Hotels & Motels

Did you ever come into contact with any hotels or motels during your exploitation? This includes but is not limited to staying nights, living there, working/being trafficked as a hotel employee or contractor, contracting with a hotel, being forced to engage in commercial sex at hotels/motels, etc. *

Yes

No

Not sure

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Figure 1.6: Survey Sections

Therefore, each individual section pertaining to each system/industry has a different total responding sample, depending on how many of the 127 total survey respondents answered “Yes” or “Not Sure” to that section’s screening question. Figure 1.6 breaks down the total number of respondents that “screened in” to each system/industry section along with the percentage of total survey respondents:

Survey section	Total # of survivors that “screened in” to section	% of total survey respondents
Financial Services Industry	99	78%
Transportation	104	82%
Social Media	73	57%
Hotels & Motels	100	79%
Health Care	88	69%
Housing & Homelessness Systems	50	39%

Survey Limitations

The survey and focus groups were not required to, nor did they undergo, a formal institutional review board (IRB) approval process. Despite the project not formally going through this process, Polaris conducted appropriate due-diligence measures to ensure that every step of the research project, including the development of the survey questions, analysis of the participants' benefits and risks, informed consent/voluntary participation procedures, data collection and security standards, compensation norms, and other participant safeguards, were survivor informed, trauma-sensitive, and thoughtfully approached to protect the research participants.

This survey was not the result of a random sample. A central limitation to diverse sampling was the finite network to which Polaris was able to distribute the survey. Although Polaris works with a wide variety of anti-trafficking NGOs throughout the United States, and every effort was made to diversify the types of NGOs to whom the survey was distributed, distribution was limited to Polaris's partners and contacts. Moreover, the distribution of the survey was at the discretion of the NGOs, and therefore, the final sample population was entirely dependent on each NGO's willingness and ability to distribute the survey to the populations it had contact with.

The survey was facilitated through accredited organizations whose networks are also finite and limited to their scope. This naturally caused a response bias leaning toward survivors of human trafficking who were already removed from their trafficking situation and receiving services or engaging in survivor leadership. As the survey did not ask about the years during which the respondent was trafficked, it is impossible to determine how long respondents were removed from their trafficking situation. Therefore, social, cultural, or environmental changes may impact the current significance of some of these results. For example, some survivor respondents may have experienced trafficking during a time which pre-dates the general availability or pervasive use of social media.

Results of the survey also lean disproportionately to sex trafficking survivors (77 percent). This indicates that NGOs with a focus on sex trafficking were either more willing or able to widely distribute the survey to the populations they serve, or the anti-sex traf-

ficking NGOs had a much more expansive network of interested survivors. Relatedly, some NGOs which serve large populations of labor trafficking survivors indicated that unforeseen environmental and political events, which coincided with the open period for survey submissions, impeded their ability to distribute the survey to their networks. The need for these providers and their networks to focus on more urgent matters likely impacted the number of labor trafficking survivors who had access to the survey.

There were other design limitations which likely impacted the response rate and response content of the survey results. First, the limited languages in which the survey was distributed likely prevented survivors of certain types of trafficking from participating in the survey. Due to resource limitations, Polaris was unable to distribute the survey in other languages but would ideally have expanded the language services if possible. Second, the online platform of the survey likely excluded some individuals who did not have the resources available to access the internet or to do so in private locations. Third, the survey's lack of anonymity may have deterred people who would have otherwise chosen to take the survey but remain anonymous.

Finally, neither the Polaris survivor survey, nor the follow up Polaris focus groups should be compared to the findings of more rigorous academic studies or prevalence estimates.

Polaris Focus Groups

For Phase II of the research project, researchers sought to dive deeper into select areas of the survivor survey to gather personal narratives and survivor recommendations for systems and industries to enhance the report. To do this, five focus groups were assembled from the pool of survey respondents. Due to the extensive number of respondents who were sex trafficking survivors, four groups consisted of sex trafficking survivors and one group consisted of labor trafficking survivors.

The focus groups primarily sought to supplement the data Polaris already had access to from the National Human Trafficking Hotline. Therefore, the selection of focus group participants was strategic to ensure researchers were able to collect the specific type of information needed to gain necessary insights for each system/industry.

First, researchers identified the specific systems/industries where deeper information was needed:

Sex trafficking Groups:

- 1) Financial Services Industry
- 2) Social Media
- 3) Transportation
- 4) Hotels & Motels
- 5) Health Care

Labor Trafficking Groups:

- 1) Financial Services Industry
- 2) Transportation
- 3) Health Care⁷

Second, researchers then identified individual respondents whose survey answers indicated that they had significant interactions with or knowledge of these specific industries during their exploitation. Every survey response was reviewed individually, and each section of the survey (finance, transportation, etc.) was ranked on a scale of 0-2 in terms of how significant the respondent's interaction with that system/industry was:

- 0= Very little/no interaction or knowledge
- 1= Moderate interaction or knowledge
- 2= Significant interaction or knowledge

To determine this significance, researchers weighed some questions in the survey stronger than others, based on the specific research needs. For example, researchers prioritized a survivor's understanding of

how the finances were managed in his or her situation, as this information is not often revealed during regular Hotline interactions.

Based on their answers, 26 survey respondents were invited to attend one of five focus groups hosted in various cities across the country.

- Los Angeles, CA - 5 participants
- Denver, CO - 5 participants
- Dallas, TX - 4 participants
- Atlanta, GA - 5 participants
- Washington, DC - 5 participants

Due to unforeseen and extenuating circumstances, two participants intended for the focus groups could not attend, and therefore provided their input through remote one-on-one interviews with researchers.

Each focus group was two hours long and covered as many prioritized systems/industries as time would allow. Of course, due to the natural flow of discussion of focus groups, not every group addressed every question or every system or industry.

Each focus group or interview was transcribed and analyzed using basic content analysis to identify common themes across groups. These themes, in combination with the quantitative survey data, and findings from the National Hotline, informed the general structure and content of this report.



Hotels & Motels

While the obvious nexus between hotels and human trafficking exist as a venue for selling commercial sex, hotels are used in a variety of ways, in both sex and labor trafficking types, by both traffickers and victims.

Since the beginning of the National Human Trafficking Hotline in December 2007 through December 31, 2017, the Hotline has recorded 3,596 cases of human trafficking involving a hotel or motel. Furthermore, **75 percent of survivors in the Polaris survey reported coming into contact with hotels at some point during their trafficking situation.** This means traffickers in all 50 states are taking advantage of unwitting hotel franchisees and relying on them to help facilitate their illicit businesses.

Figure 4.0:
Hotel & Motel Involvement During Trafficking
Polaris Survivor Survey (n=100)

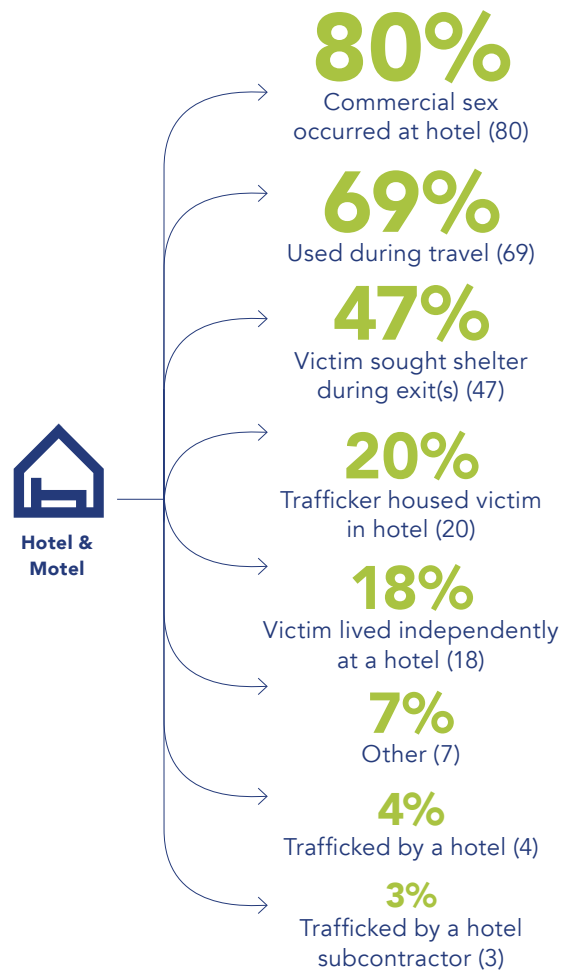
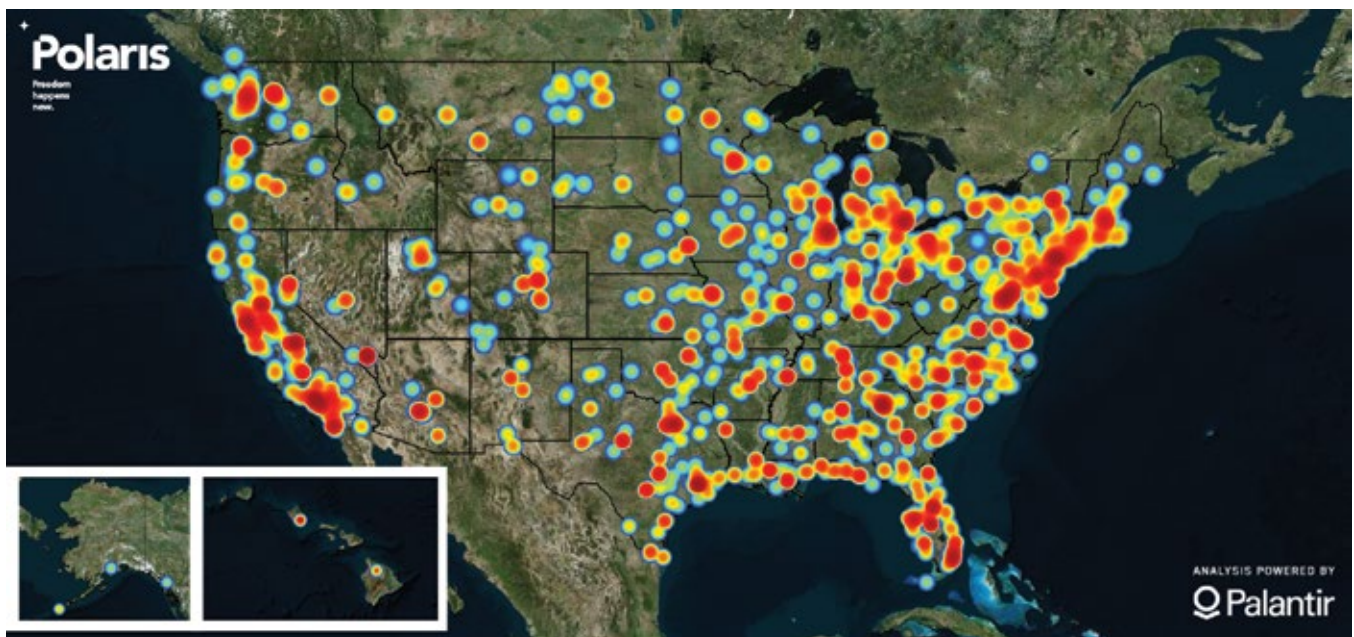


Figure 4.1: Locations of Potential Trafficking Cases Occurring at a Hotel/Motel

National Human Trafficking Hotline
(December 7, 2007 - December 31, 2017)



How Hotels & Motels may be used in Recruitment

On the National Human Trafficking Hotline, there have been rare accounts of traffickers using hotels and motels as recruitment grounds for sex trafficking. Although infrequently reported, this potential tactic is a particular concern since vulnerable individuals experiencing unstable housing often utilize hotels during times of transition. However, the intersection with hotels and motels falls mostly within a trafficker's business operations.

"And I think the customer feels better about [going to a nicer hotel]. They feel better about giving this girl their money, when really they are with pimps."



How Hotels & Motels may be used in Trafficking Operations

Hotels used in Escort Services

Hotels are a crucial piece of the infrastructure necessary to facilitate human trafficking in escort services. In fact, of the 3,596 cases of human trafficking reported to the National Hotline to be occurring at a hotel, 2,920 or 81 percent of those were used within the escort services business model.

Escort services using hotels primarily function one of two ways: an “in-call” model or an “out-call” model. In-calls are when the trafficker or victim books the hotel room where the victim is usually confined while buyers cycle in and out. This cyclical business operation is often repeated in numerous hotels as the trafficker moves victims and business throughout the region or country.

Contrary to popular misconception, trafficking does not only take place in cheap hotels or motels with sub-par accommodations. Instead, traffickers running in-call escort businesses look for a range of factors including convenient locations, buyer comfort, price, a hotel’s policies, procedures, and infrastructure, and whether the hotel is prone to law enforcement monitoring. As a result of these needs, trafficking may often occur at hotel chain franchises that offer a good balance of quality and price while giving buyers a sense of anonymity and safety. Survivors in Polaris focus groups also mentioned that these hotels are perceived by traffickers to have distracted and busy staff, which allows trafficking to go undetected. There is currently no research to indicate the average length of time a trafficking operation stays at one hotel. Focus group participants noted that a city’s current demand, local events, and law enforcement vigilance are just some of the factors considered when choosing to relocate.

An in-call trafficking business model can provide hotel staff with more opportunities for identification since the victim and trafficker are typically both on site for an extended period of time (as opposed to one night).

In these cases, there is typically a reservation and payment footprint associated with the victim or trafficker, and there is usually more foot traffic on the property from buyers.

While more research is needed to analyze who is typically reserving the hotel rooms and how they are paying, the Polaris survey elicited some preliminary results. **Forty-five percent of respondents stated that the hotel was booked under the trafficker’s name** with a close **44 percent reserved under a victim’s name**. Figure 4.2 breaks down the data.

The vast majority of survey respondents - 74 percent - reported their rooms were usually paid for in cash. However, these results should be seen in the context of the times, as many survey respondents were trafficked during an era when hotel cash payments were more widely accepted as normal protocol. Therefore, this research is worth replicating with survivors who experienced their trafficking more recently, as many hotel procedures regarding payment have evolved.

Among survey respondents, when electronic payments were used, **24 percent were done with the victim’s credit/debit card, 21 percent the buyer’s card, and 18 percent a credit/debit card under a trafficker’s name**.

“We would stay in places where we thought clients were comfortable coming as well... Of course we wouldn’t pay extreme prices. But just nice enough and affordable so my profits were still ok.”

Figure 4.2: Hotel & Motel Reservations

Polaris Survivor Survey (n=100)

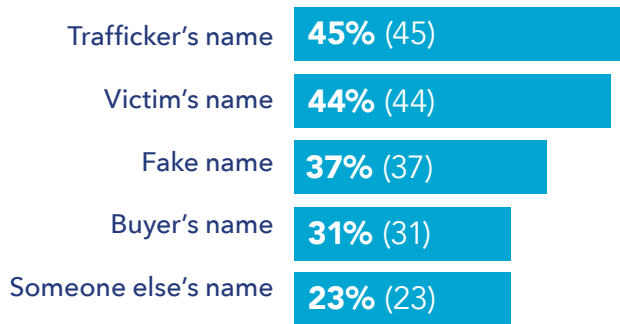
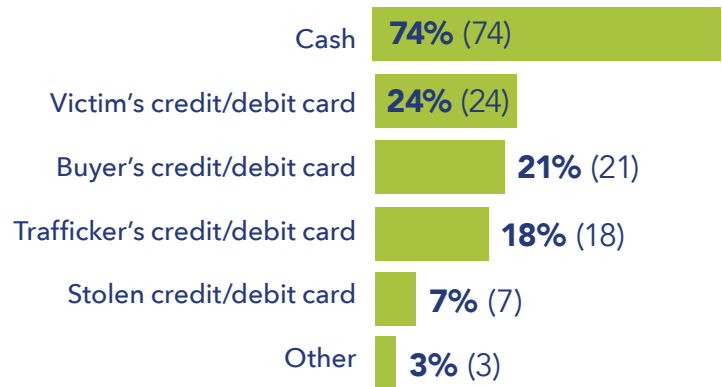


Figure 4.3: Hotel & Motel Payment

Polaris Survivor Survey (n=100)



In terms of booking hotel venues, third-party websites such as Priceline, Hotwire, and Expedia were frequently mentioned in every focus group with sex trafficking survivors. Considering the time that has passed since many focus group participants were in their trafficking situations, and the expanded use of the internet generally, Polaris believes that travel websites and travel fare aggregator sites are even more commonly used in trafficking operations today.

“Out-calls” are when the victim is delivered to the buyer’s location, which is often a hotel room but can also be a residence. While it is possible that hotel staff are able to detect potential sex trafficking activity in out-calls, it is less likely due to the duration of time the victim is at the hotel, lack of visits to the hotel room, lack of interaction with staff, and the fact that the trafficker is not typically present on-site. Because of these barriers, it can sometimes be very difficult for a hotel to decipher between prostitution and sex trafficking using an out-call model.

“The biggest [red flag], was that I was a child spending a lot of time around a specific hotel for literal years. And nobody ever asked me questions, nobody ever called the police.”

Hotels used in Other Types of Sex Trafficking

Hotels and motels are also used in human trafficking via outdoor solicitation and in bars, strip clubs, and cantinas. In these trafficking types, the transaction is initiated at a separate location, such as on the street, at a truck stop, or within a bar or strip club, but the sex act can be taken off-site to a nearby hotel or motel. In some Hotline cases, owners and operators of illicit bars, strip clubs, or cantinas have sometimes been reported to have an “off-the-books” arrangement with area hotels to facilitate this illegal activity. To most hotel staff, these sex trafficking types will likely look similar to those of out-call escort services.

The National Hotline has received reports of other sex trafficking typologies such as pornography (23 cases), residence-based sex trafficking (50 cases), and personal sexual servitude (13 cases) using hotels as an occasional or supplementary location for their crimes. In one survey of LGBT youth who were involved in New York’s sex trade economy (mostly engaged in survival sex), 57 percent stated that they traded sex with customers at hotels.⁵⁵

Trafficking Indicators in Hotels & Motels

Hotel employees have an ability to detect possible red flags that may indicate potential human trafficking in both traffickers and victims due to their close proximity to hotel guests and access to their rooms. Below are just some observable signs for which to be vigilant. However, not all of these indicators are indicative of human trafficking on their own. As an example, signs that a party occurred in a room could indicate a variety of scenarios that regularly occur in hotels. Additionally, hotel employees should be aware of the difference between commercial sex and sex trafficking. Some indicators listed below suggest that commercial sex may be taking place, so if employees identify those signs they should also look for additional indicators that would suggest that the poten-

tial victim in question is being subjected to some form of control, is not fully consenting to the situation at hand, or is under the age of 18.

It is important to note that hotel employees should not rely on physical appearance alone when identifying potential trafficking situations -- traffickers and victims can be different genders and ages, or wear different styles of clothing. Furthermore, it should go without saying that an individual's race/ethnicity, or how their race may or may not differ from their acquaintance's (inter-racial/adopted families, significant others, etc.) are not indicators of human trafficking.

In-call Escort Services	Out-call Escort Services	Traveling Sales Crews	Other Labor Trafficking <i>(housekeeping, other hotel subcontractors)</i>
<ul style="list-style-type: none"> • Pays for hotel in cash or with pre-paid credit card • Extended stay with few possessions • Short stay with excessive luggage • Initial reservation is for one night, but extended day by day • Requests room overlooking parking lot or not within view of front desk • Presence of excessive drugs or sex paraphernalia • Excessive condoms in trash cans • Frequently asks for new towels, washcloths, and/or linens • Excessive foot traffic in/ out of rooms 	<ul style="list-style-type: none"> • Staff observes the same female(s) on different visits with different men • Guest is overly concerned with surveillance cameras or entrance policies • Female is dropped off and visits for 30 minutes - 1 hour only • Someone waits onsite (e.g. in parking lot) for female • Room is booked with business card but is paid in cash 	<ul style="list-style-type: none"> • Abandoned or locked out young adults on property • Signs that occupancy exceeded what was specified in the reservation (e.g. makeshift sleeping arrangements on floors) • Sales flyers left behind that detail suspicious magazine sales tactics • Evidence of excessive drug use, alcohol use, and/or partying • Multi-passenger van(s) on property • Social media "check-ins" that display excessive displays of cash 	<ul style="list-style-type: none"> • Verbal or physical abuse by supervisor • Prevented from taking adequate breaks • Doing different work than what was contracted or promised • Forced to meet daily quotas • Living and working on site • Forced to turn over wages • Exorbitant fees deducted from paychecks • Not paid directly • Extremely fearful of immigration or police • Not given proper safety equipment • Mentions of debt
General Indicators:			
<ul style="list-style-type: none"> • Verbal or physical abuse • Restricted or controlled communications • No freedom of movement or evidence of constant monitoring <ul style="list-style-type: none"> • No control of money, cell phone, or ID • Exhibits fearful, anxious, or submissive behavior • Dresses inappropriate given the climate • No knowledge of current or past whereabouts • Signs of poor hygiene, malnourishment, or fatigue 			

Hotels used in Traveling Sales Crews

The National Hotline has received 686 cases of trafficking involving traveling sales crews since December 2007. After escort services, traveling sales crews are the other type of trafficking most likely to use hotels as part of their business model, as crews typically stay at low- to mid-cost hotels or motels along their sales routes.

There are numerous signs for hotel staff that a room is being rented for this purpose. Traffickers may have far more people stay in each room than hotels allow, which can be a severe fire code violation. These code violations may put the hotel at risk as they have the potential to lead to liability issues. In many cases from the Hotline, potential victims have reported that if they did not make enough money during the day, they would sleep in the vans, on the floor, in the bathtub, or even on a hotel balcony. Potential traffickers in these abusive crews will sometimes throw parties for successful salespeople after hours, so there may be indicators such as property damage, rooms left in disarray, excessive alcohol and drug use, or noise complaints. The crews may also leave behind flyers or other materials that detail their suspicious sales tactics (mostly in reference to magazine sales).

Of course, potential traffickers know they could possibly be identified and take pains to avoid law enforcement when possible, often selecting hotels well outside the jurisdiction of the police department working in the area where the crews are operating.⁵⁶ If local law enforcement picks up on their presence in the area, crews generally head for another state due to the fact that their salespeople are rarely soliciting with the necessary legal permits. There is little to no research on how crews are paying for or reserving hotels, but it is suspected cash payments are preferred.

One of the main methods of control potential traffickers use in sales crews is abandoning members who resist abuse, or do not live up to potential traffickers' sales expectations. Out of the 356 potential victims identified in National Hotline traveling sales crew trafficking cases since January 2015, 47 percent of them were controlled through practices of isolation, including abandonment. Many potential victims reported being aban-

doned on hotel property, much like a former sales crew member detailed in a Polaris interview in 2015:⁵⁷

"As soon as I told [my managers] I wasn't going to stay, they kicked me out of my hotel room and left me in a bad part of town without any money. I had to find my own way to the bus station and I had to ask around for hours before I got there. My mom paid for my ticket, but by the time I got home I was sick and hadn't eaten for three days."

The same former crew member recalled witnessing one man from his crew being followed by four other members into a hotel room where he was beaten unconscious. In another horrifying incident involving a hotel, detailed in a 2015 Al Jazeera America investigative article, the body of a 25-year-old sales crew member was discovered in a motel room in Maryland. The potential victim had allegedly overdosed on heroin while staying with the crew in the motel. Instead of calling 911 or taking him to a hospital, his crew allegedly abandoned him in the motel room and took his wallet, cell phone, and other belongings with them.⁵⁸

Labor Trafficking within the Hotel Supply Chain

Labor trafficking has been found in hospitality businesses such as hotels, motels, resorts, and casinos. Potential victims of labor trafficking can work as front-of-house staff, food service workers, and most frequently, in housekeeping.

When looking at the 482 potential victims of labor trafficking or exploitation in this sector, identified on the Hotline since January 2015, most potential victims are women and men from Jamaica (100), the Philippines (80), and India (34). Mexican potential victims were not far behind in terms of victims recorded (20).

The vast majority of labor trafficking potential victims in hotels came to the United States on a temporary work visa, usually H-2B. Some also hold J-1 visas, which are supposed to facilitate cultural exchange. They are recruited overseas and promised lucrative contracts and decent working conditions. Many go into debt to pay the excessive and often fraudulent recruitment fees. They arrive to find abusive and exploitative work-

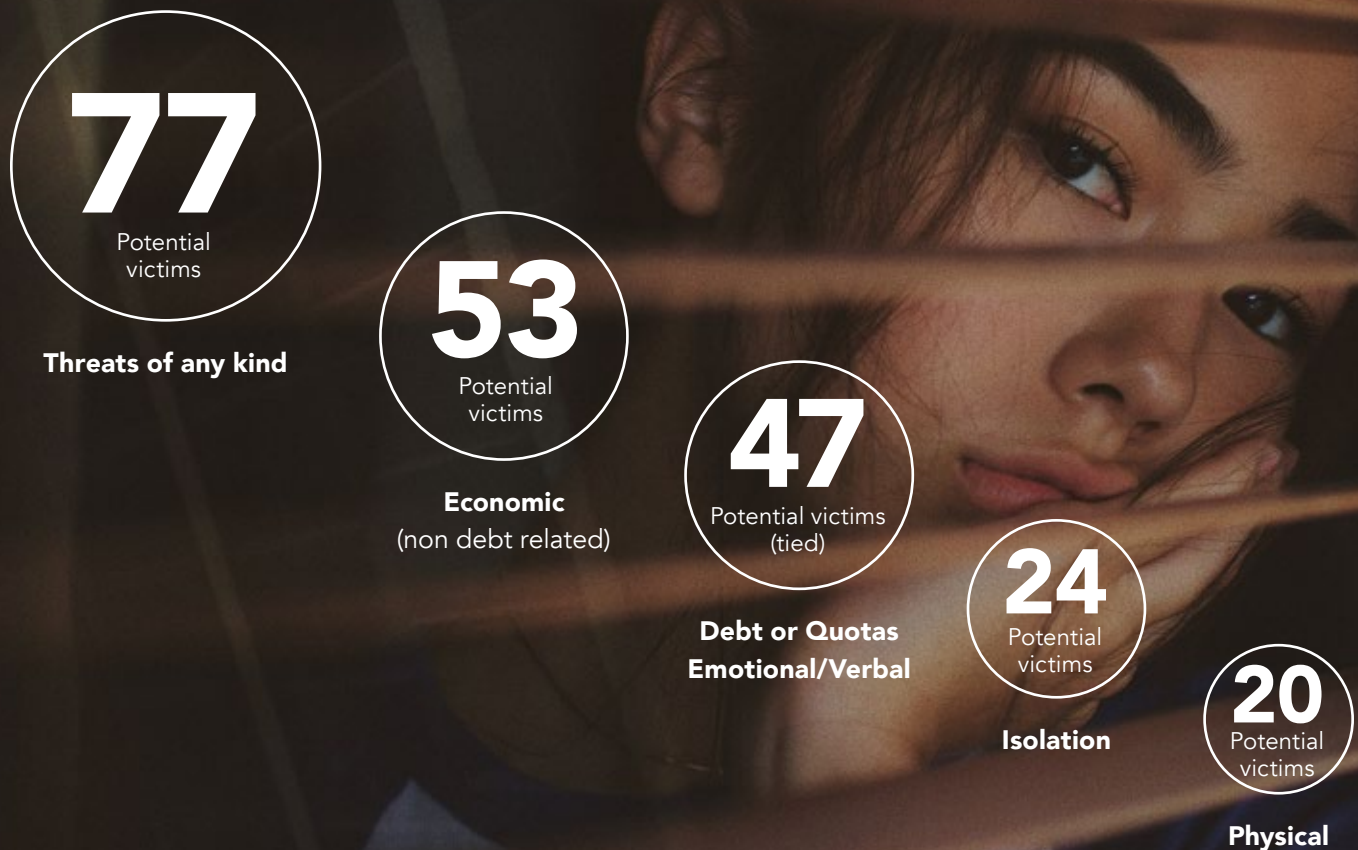
ing conditions, ranging from inhumane living conditions, to low or no pay, to verbal, physical, and sexual abuse. Yet leaving is not a real option for most. In the case of the H-2B visa holders, their legal status in this country is tied to their specific employer. J-1 visas provide the option for visa portability, but the process to switch employers under the visa can be extremely cumbersome and confusing for foreign workers unfamiliar with the bureaucracy of the U.S. immigration system.

Data from the National Hotline cannot definitively determine how many potential victims are trafficked directly by hotel management and how many are potentially trafficked by subcontractors or staffing agencies. Due to the complex staffing systems involved in many labor supply chains, including hospitality, potential victims on the National Hotline typically have a difficult time ascertaining who their actual "employer" is, let alone who is exactly responsible for their abuse or exploita-

tion. However, a 2014 Urban Institute study found that among the hospitality cases in their sample, the majority of suspects were foreign nationals (71 percent) who "tended to be labor contractors or subcontractors hired to recruit victims abroad" and facilitate their employment.⁵⁹ This highlights the ever-pressing importance of hospitality businesses to directly hire employees whenever possible, and/or make it their professional responsibility to investigate the hiring and employment practices of all subcontractors.

It is also worth noting that slavery can often be found along the supply chain of the products hotels frequently use on site, from the bed sheets, to the decor, to the coffee poured at breakfast. Unknowingly, hotels could potentially be supporting the unethical treatment of workers across the globe with each vendor contract they sign if diligent inquiry into sourcing policies are not pursued.

Figure 4.4: Top Five Methods of Abuse in Potential Hospitality Labor Trafficking:
National Human Trafficking Hotline (January 1, 2015 - December 31, 2017)



How Hotels & Motels may be used by Victims & Survivors

Victim Interactions with Hotel Staff

Thousands of potential human trafficking victims are coming into contact with the hospitality industry daily - whether they're forced to engage in commercial sex, seeking safe refuge after fleeing their trafficker, living temporarily on-site, or being trafficked by the hotel or hotel subcontractors. However, despite how many victims are crossing paths with hotels, **94 percent of Polaris survey respondents disclosed they never received any assistance, concern, or identification from hotel staff.** While most survivor participants explained it is not always safe nor recommended for staff to directly intervene, especially with a victim who has not yet self-identified as such, some instances would warrant emergency intervention, or at the very least, human compassion. For example, one survivor from a Polaris focus group told her story:

"...[My trafficker] was sitting outside in the [hotel] parking lot waiting. He knew I was going to leave, so he was just watching me... He broke the TV, threw it over the railing, took the phone, smashed my face, put ashtrays in the pillowcase and was swinging it [at me]. I was screaming, but nobody did [anything]. It was all just girls that had pimps themselves [around the immediate area], so nobody's going to say anything. I remember he took my car, he took my phone and all that. So I was just sitting in the parking lot and crying [and] bleeding. The [front desk clerk] was just like "I'm not getting involved in all that" and just said, "you guys can't get a room here anymore, I'm keeping your deposit." [The front desk clerk] wouldn't even let me use the phone to call police."

While not uncommon, this situation is incredibly troubling, not only because of the violence perpetrated against the survivor, but because the hotel employee did not know how to appropriately and effectively

respond to a difficult situation. The hotel employee saw a disturbance, a woman in the sex industry, and a potential threat to the hotel's business. As a result, they treated her like a criminal, unwelcome on the property and undeserving of additional help. However, in reality, she was a human trafficking victim experiencing a crisis.

Had the front desk clerk been trained on the realities of human trafficking, he or she would have been able to recognize red flags indicating exploitation, follow internal protocols for potential human trafficking situations, and potentially connect the victim to supportive resources. The Hotline has received many cases (sometimes directly from hotel staff themselves) that showcase the benefits of responsible practices that protect human trafficking victims as well as the hotel property's bottom line, where hotel staff have been sources of trust and safety during desperate times of crisis. If a hotel employee finds themselves in a similar encounter with a potential survivor, following the survivor's lead as far as their safety and reporting decisions is of the utmost importance. One survivor in a Polaris focus group explained how a hotel work discreetly helped her with her safety plan in leaving:

"I remember I had run away from one area in [the city] to another area and there was only a couple hotels I was still able to stay at, just because for whatever reason they would kick us out ... and would put our name on a list. So [my trafficker] knew which hotel I was going to be at. The guy at the front recognized me. So when I checked in, I was like "can you please not tell anybody that I'm here?" [The front desk clerk] was really helpful. I didn't have to tell him I was running away. He didn't call the police which he knew I didn't want, or anything like that. That was helpful in itself, for him to just respect what I was asking and putting me in a room that was not my normal room. Things like that where he's not necessarily doing too much, but he's recognizing [how to help]."

Survivors Utilizing Hotels for Shelter

Short-term shelter is one of the critical needs for many survivors of human trafficking. Yet existing public and non-profit shelters are not always an appropriate fit - assuming there is even a local shelter that serves human trafficking survivors in the first place. The lack of options is particularly acute for labor trafficking survivors, males, and gender non-binary victims. In such cases, hotels can be the only option for meeting a survivor's need for a safe place to stay immediately after leaving their trafficking situation.

While emergency shelter is the most pressing need, travel and lodging are often the biggest barriers to survivors who take advantage of consulting opportunities and speaking events that allow them to share their experiences and insights with the field.

While many hotel chains and individual operators have committed to fighting human trafficking and supporting survivors, there have been instances reported in which hotel operators claim that intervening in a trafficking situation in any way, including using their facilities for survivor shelter opens them up to risk and liability. The reality is that hotels are already being used by criminal enterprises, effectively making each room a metaphoric crime scene and that increasingly, hotels are at risk of being held responsible if they do not act.

One example is the pending 2017 lawsuit against a Philadelphia hotel. According to court documents, a survivor who was 14 at the time of her potential trafficking, alleged that hotel operators "knew or had constructive knowledge" that she was being sexually exploited, and the hotel, for its own financial gain, consistently provided hotel rooms to her traffickers. The suit was filed against the hotel owner, the hotel, and the hotel's parent company and sought \$50,000 to cover resources needed for the survivor's recovery including medical expenses.⁶⁰ The lawsuit was the first under Pennsylvania's 2014 human trafficking statute amendment, and many states like Florida⁶¹ are looking to enact similar amendments to allow survivors to hold business owners, among others, accountable, when they may be blindly compliant.





INDUSTRY SPOTLIGHT: Wyndham Hotel Points Program

Wyndham Hotel Group has been an early trailblazer in dedicating their resources and industry influence to support survivors of human trafficking. In 2008, Wyndham graciously donated one million Wyndham Rewards® points for Polaris to use for survivors through its Client Services Programs. When case managers needed a bed for a survivor after an escape, a crisis situation, or following law enforcement intervention, it was a Wyndham hotel which provided the first moments of safety and relief that had been deprived of them for so long. In 2014, Wyndham Hotel Group and Polaris announced an even further reaching partnership. As part of the joint effort, Wyndham Hotel Group and Polaris developed comprehensive training and educational tools for Wyndham hotel owners and franchisees, property-level staff, and employees at its corporate offices and call centers to educate them about all aspects of human trafficking. In addition, Wyndham Hotel Group donated one million Wyndham Rewards® points to Polaris to use on the National Human Trafficking Hotline and among its vast network of anti-trafficking service providers seeking safe hotel rooms for survivors. Wyndham Hotel Group also began providing its customers an ability to donate their Wyndham Hotel Points directly to Polaris as well.

Restore NYC, a service provider partner who participated in the pilot version of the Wyndham Hotel Points Program, provided this survivor success story:

"Restore NYC received a phone call for a young woman Mariah* who was with her trafficker in Brooklyn, NY. Mariah was living in a residential brothel for 6 months and said "I want out." Tearful on the phone, she asked for help finding a place to go. Our referral coordinator helped her to leave the residence safely and take the train to a nearby location to our office. Because there were no crisis beds available that night in our NYC domestic violence shelter system or for the few partners that provide crisis shelter, we contacted the National Human Trafficking Hotline and accessed housing for Mariah through the Wyndham Hotel Points Program. She was placed in a nearby hotel for several nights and reported sleeping and eating well; this was a critical time of stabilization for her. She said to our staff "I feel so cared for." We just met with Mariah again this week (several months later), and she is now in a 90 day home and finalizing an intake process for transitional housing placement for survivors of trafficking here in New York City. She has reconnected with her family (her grandmother and sisters) and also started a new job. She is hopeful for her future."

During the December 2015 - December 2017 pilot phase with select service providers, the Wyndham Hotel Points Program has assisted 39 individuals for a total of 100 hotel nights. After this successful pilot phase, in 2018, the program will be scaled nationwide.

*Names and other details have been changed or omitted to protect the confidentiality of survivors.

Victim Identification in Hotels

Hotel owners and staff often have a unique vantage point from which to identify potential human trafficking victims on their properties. Several major hotel chains have recognized this and taken on the responsibility, requiring staff to be trained on how to effectively identify and respond to human trafficking. Some even break down the training to focus on specific staff roles, such as differentiating between red flags that front desk staff are likely to see versus red flags that cleaning crews or security guards may be more likely to notice.

The results of commitment from hotels in this realm have been encouraging. In one notable case from the National Hotline, a hotel employee at the front desk encountered a potential trafficker who attempted to check in around 1:00 a.m. using identification that did not match the reservation name. The hotel employee declined to check the potential trafficker in, but later saw him with a minor female who was dressed in very little clothing and appeared to be under the influence. The hotel employee searched Backpage.com where he found an advertisement for the girl. He contacted the National Hotline and a report was immediately sent to specialized law enforcement contacts in the hotel's area.

In addition to training staff, many hotels are making efforts to post the National Hotline number on their property, both so victims are aware of the option to seek help, and guests know there is an avenue to report suspicious behavior. Some cities have enacted legislation mandating the posting of the National Hotline number at all hotel properties.

Other hotel-centered identification efforts are being spearheaded by anti-trafficking organizations on local and national scales. Save Our Adolescents from Prostitution (S.O.A.P.) is a survivor-led organization that, via volunteers, distributes bars of soap clad with the National Hotline number on the wrapping to high-risk hotels and motels. To date, S.O.A.P. has distributed nearly one million bars of soap nationwide,⁶² and the Hotline has received trafficking-related calls from potential victims and hotel staff as a result of the innovative campaign to help inform trafficking victims of their options to seek help.

Although these and other identification efforts are an excellent start, there is a need for more formal and consistent protocols within hotels and motels to better facilitate victim identification. The number of potential victims identified at a hotel is unfortunately still dwarfed by the number of cases reported to the National Hotline that reference exploitation occurring on these properties.

↓ Photo courtesy of The SOAP Project.



Hotel & Motel Industry: Recommendations & Opportunities

1. Formally Adopt A Company-Wide Anti-Trafficking Policy

The first step toward helping to eradicate human trafficking in hotels is adopting a policy that articulates the company's commitment to combating all forms of human trafficking (sex and labor, adult and minor victims, U.S. citizen and foreign national victims) at all levels of the business. [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](#), are good places to start. But having a policy on paper is not enough. Companies must enforce such policies and be proactive in preventing their facility from being used by traffickers. Once adopted, the policy should be clearly communicated and implemented at all levels to ensure there is no human trafficking on-site, within the workforce, or within the company's sourcing and procurement supply chains. This simple, yet formal, acknowledgement can help establish that the hotel and/or hotel parent companies are in compliance with the applicable laws. It also ensures that staff and customers alike recognize the importance of the company's values. Parent companies should require that every franchisee adopt and adhere to such policies, and hospitality associations should do the same for member businesses.

2. Hotel Points Donations and Local Shelter Support

Donating hotel points is a tangible way hotels can help fill in the holes in a national shelter safety net and/or provide support for survivor leaders engaging in consulting opportunities and speaking events. Companies may also consider instituting a way for customers to donate their points too. If a philanthropic model is not possible, hotels can work with neighboring anti-trafficking shelters to establish lodging protocols and partnerships, including the necessary confidentiality and liability policies, to support shelters in crisis situations when all beds are filled.

trafficking shelters to establish lodging protocols and partnerships, including the necessary confidentiality and liability policies, to support shelters in crisis situations when all beds are filled.

3. Train Staff On What To Look For And How To Respond

Training is essential to identifying and responding to human trafficking in hospitality businesses. Strong education protocols would include annual trainings, at the point of hire, and include staff at all levels (property owners, general managers, and line staff). One of the reasons why it is so important to train hotel employees how to identify and respond to trafficking is so they do not find themselves relying on superficial indicators (which can lead to higher instances of misidentification). Instead, hotel employees should consider all of the relevant information before them and evaluate the indicators in the context of the situation at hand. All trainings should incorporate internal processes and protocols for how to respond to and report human trafficking. The strongest trainings are those shaped by or led by survivors, who can also consult on business protocols to ensure all policies are survivor-centered. Again, parent companies and hospitality associations should require all members to have a human trafficking training policy in place as a condition of their franchise license or association membership.

“Personally... I want everyone who works in the hotel industry just to identify... Don't get involved [directly]. I just want them to be able to identify it to make that call [to a hotline].”

4. Establish a Response Plan Involving a Safe Reporting Mechanism

Hotels need clear procedures for responding to and/or reporting human trafficking when it is suspected on-site, within the workforce, or within the supply chains. As to exactly what that procedure looks like, focus group participants' ideas reflected the variety of their own experience. Some suggested law enforcement intervention, some preferred service provider outreach, and many preferred the National Human Trafficking Hotline be used when in doubt. Reporting suspicions to the National Hotline is a safe and secure step that hotels could consider incorporating into their reporting mechanisms, since the Hotline can triage all potential human trafficking situations and has developed survivor-centered protocols depending on each individual circumstance. Almost all survivors recommended immediately involving the police or the National Human Trafficking Hotline if a potential victim is suspected to be a minor.

Because adult survivors may not necessarily identify as victims, or may not be ready to seek out assistance, some survivors in Polaris focus groups suggested alternative response protocols that do not include immediate intervention. One repetitive suggestion was developing a working relationship with a local anti-trafficking organization who could provide periodic outreach on site, respond with crisis advocacy if a victim reaches out for immediate help, or accompany law enforcement partners in the event of an acute incident. Hotel staff could also have a basic understanding on the services the agency provides and seamlessly connect victims whenever it is safe and appropriate to do so. One survivor explained what many survivors expressed should be at the center of a good hotel response:

"If staff were to receive training, [it should be] to shift their perspective on what's happening. Even if [the victim is] not talking about getting out, just that human experience of being shown compassion and empathy, or them having the ability to connect with services if the girl reaches out and wants the services... Everyone wants to have a savior mentality, but I think the idea is that you can't undermine the ability to build relationships."

5. Hotel and Travel Booking Sites: Use Data for Identification Efforts

While well-trained and alert front-line hotel staff are invaluable at detecting the signs of human trafficking on-site, there is likely room for hotel booking sites to play a similar role if they choose to. Tapping into a potential treasure trove of data analysis tools and capabilities to research customer identities and check them against known commercial sex websites or other sources of data indicating illicit activity, could prove to be a major disruptive approach to human trafficking detection in the travel and hospitality sector.

6. Directly Hire Employees Whenever Possible

It is well documented that the more removed or tenuous an employment relationship is, the more vulnerable workers are to abuse, including debt bondage, threats, and other severe labor violations. If it is not possible for a business to directly hire all personnel, Polaris strongly recommends hotel owners and management thoroughly research subcontractors' recruitment and business practices, require transparency about those practices, create oversight systems that enforce transparency requirements, and make it clear that abusive practices will not be tolerated.

7. Work With Suppliers And Vendors Who Responsibly Source Their Products

Human trafficking can occur within hotel's procurement or vendor's supply chains. Hotels are encouraged to make a point of requesting copies of a potential vendor's corporate responsibility policies addressing their commitment to fair labor before any contracts are signed. Whenever possible, hotels are encouraged to purchase from businesses using fair trade and responsible sourcing models, such as [GoodWeave](#), [The Fair Food Program](#), and [Servv](#). Hotels can start by switching to fair trade certified coffee, or inviting these alternative businesses to attend their next trade show.

8. Post the National Human Trafficking Hotline for Victim Access

Often, victims of human trafficking are kept isolated, so having the National Human Trafficking Hotline number visible on hotel property might be a victim's only life-line to safety. Many survivor focus group participants strongly urged the importance for the Hotline number to be posted within the actual hotel room providing suggestions such as scrolling on an idle TV screen, in the concierge binder, inside a nightstand drawer, on lotion bottles, soap bars, or bathroom mirrors. Hotel vending machines are also frequent places where victims have contact.

"I remember when I was working in the Bay Area and on the hotel TV screen, it kept saying "if you see something, say something" about [reporting a] bomb or something suspicious... So [there should be] something like that [with the trafficking hotline number] in the actual hotel room. Or maybe also on the bathroom wall, or somewhere inside of a drawer for when they open it up. If I would have seen something like that all the times that I just got beat up... I mean, I've had some really bad experiences in hotel rooms, and if I had seen something like that I would have called it."

9. Advocate for Appropriate Hotel-Related Legislation

Polaris supports legislation requiring all hotel staff be trained on identifying and responding to potential human trafficking. [Public Act No. 16-71](#), passed in 2016 by the The Connecticut General Assembly, is an exemplary model for the entire nation. Although cities and municipalities, like Baltimore City, have enacted similar legislation, the Connecticut law was the first of its kind on a state level. As of October 2016, all hotel and motel staff in the state of Connecticut must receive mandatory training on how to recognize victims and activities commonly associated with human trafficking. It also gives those owners and staff who observe human trafficking concrete action steps they can take to deter traffickers and connect victims to services. The law also requires hotels and motels to keep track of all guest transactions and receipts, severely impeding the practice of hourly room rentals to no-name traffickers and sex buyers. The law goes one step further in an attempt to bring awareness to the public and possible victims of human trafficking by requiring all hotels and motels to post a notice about what human trafficking is and how to obtain help by contacting the National Human Trafficking Hotline. Although some states like Louisiana have laws mandating that the National Hotline be posted in every hotel, the type of legislation in Connecticut incorporates the hotline posting law as part of a hotel certification process, making it more difficult for owners and operators to claim ignorance.

If you are a hospitality or travel industry professional and want to learn more about working with Polaris, please contact corporateengagement@polarisproject.org

Glossary

Systems and Industries	
Financial Services Industry	Encompasses anything within the purview of the formal financial services industry including institutions and initiatives such as retail banks, commercial banks, financial crimes monitoring, money transfers, formal paychecks/payroll, credit/debit cards, investments, virtual currency exchanges, etc.
Health Care	Includes but is not limited to, preventative care, emergency health, reproductive health, other medical specialties, mental health, dental, vision, and substance use disorder treatment. This report also includes the services and benefits afforded to individuals with disabilities.
Hotels/Motels	Business establishments whose primary purpose is to provide short-term lodging and accommodations for travelers.
Housing & Homelessness Systems	Encompasses either: <ol style="list-style-type: none"> a. Any institution or agency whose primary purpose is providing safe and operational housing for a community. This includes governmental agencies like HUD and local housing authorities, and private entities such as apartment management companies, landlords, etc. OR; b. Any system or agency which provides safe shelter services to individuals experiencing homelessness or unstable housing. This includes, but is not limited to emergency shelter, transitional shelter, domestic violence shelters, and long-term supportive housing.
Social Media	Encompasses online websites or platforms whose intended purpose is to foster the connection of people to share ideas, interests, and information. Examples include: Facebook, Instagram, chat services, dating sites, etc. <ul style="list-style-type: none"> • NOTE: This DOES NOT include online platforms whose primary intended purpose is to connect people to commercial goods or services (e.g. Backpage, Craigslist, john boards, Yelp, Groupon, etc.)
Transportation Industry	Encompasses any type of publicly or privately owned and operated mass transportation systems including buses, subways, trains, airlines, taxis, and ridesharing services, as well as private transportation like a personal vehicle or rental car.

Miscellaneous Terms

"Bottom"/"Bottom girl"	A slang term used by some American pimps to refer to a victim still under their control but who has "earned" more "privileges" and a higher ranking among the other potential victims. Bottoms are typically manipulated into sharing some the recruitment and enforcement responsibilities with the actual trafficker, but are often still victims themselves. For more information on the plight of a bottom girl, Polaris recommends reading the four-part blog series, Unavoidable Destiny, by survivor leader Shamere McKenzie on the Shared Hope International blog. ¹⁷⁰
Case	A data record from the National Human Trafficking Hotline which refers to an individual situation of potential human trafficking. Polaris and the National Hotline use the U.S. federal definition of human trafficking when assessing cases. (Data timeframe of December 7, 2007 - December 31, 2017)
In-calls	Occurs when buyers go to the victim's location for commercial sex acts.
Individual potential victim profile	A data record from the National Human Trafficking Hotline which refers to a potential victim uniquely identified in potential human trafficking and labor exploitation cases. (Data timeframe of January 1, 2015 - December 31, 2017)
Labor exploitation	A labor situation involving workplace abuse and/or related labor violations, which does not contain at least moderate elements of force, fraud, or coercion compelling the person to remain in the situation.
"The Life"/"The Game"	The commercial sex industry.
National Hotline	National Human Trafficking Hotline: 1-888-373-7888 or Text BeFree (233733)
Out-calls	Occurs when a victim goes to or is delivered to a buyer's location for commercial sex acts.
Survival sex	The exploiter is supplying the victim with basic living necessities (shelter, food, clothing, drugs, medication, etc.) in exchange for sex. This arrangement could be voluntary (with adults 18+), exploitative, or rise to the level of sex trafficking (See: Personal Sexual Servitude), depending on the conditions. However, unless otherwise stated, when referenced in this document, it is solely regarding instances of sex trafficking.
Track/Stroll/Blade	An outdoor section of a street block used to solicit sex.

Miscellaneous Terms

<p>Trauma-informed care</p>	<p>“A program, organization, or system that is trauma-informed:</p> <ul style="list-style-type: none"> • Realizes the widespread impact of trauma and understands potential paths for recovery; • Recognizes the signs and symptoms of trauma in clients, families, staff, and others involved with the system; • Responds by fully integrating knowledge about trauma into policies, procedures, and practices; and • Seeks to actively resist re-traumatization.”¹⁷¹
<p>“Trick”/“John”/Buyer</p>	<p>A buyer of commercial sex acts.</p>
<p>Type (e.g. Type of Human Trafficking)</p>	<p>Polaris has defined a particular type of human trafficking as a unique industry or business model used to exploit people for commercial sex or labor/services. Each type becomes distinct when aspects regarding business operations, trafficker and victim profiles, recruitment, and institutional systems and industries used are sufficiently different from another. Please see our preceding report, The Typology of Modern Slavery for more information.</p>
<p>Voluntary services model</p>	<p>“Voluntary services, as opposed to mandatory services, means that clients do not need to complete a program or take part in other services as a condition of receiving housing. Services are offered based on each person’s specific needs.”¹⁷²</p>

References

Methodology

1 Labor exploitation statistics are non-cumulative. A single labor exploitation case may involve multiple types.

2 Polaris uses the United States federal definition of human trafficking as defined by the Trafficking Victims Protection Action (TVPA) to determine if a situation described through the Hotline has indications of human trafficking. Cases which fully meet the TVPA's standard are labeled as having "high-level indicators of trafficking." Cases which partially meet the TVPA's standard but are missing pieces of information needed to make an assessment are labeled as having "moderate-level indicators of trafficking."

3 Please see the methodology for *The Typology of Modern Slavery*, which can be found at: <https://polarisproject.org/sites/default/files/Polaris-Typology-of-Modern-Slavery.pdf> (pg. 7).

4 In these cases, the signaler could have been reporting a situation that had at least moderate indicators of human trafficking, but the signaler's proximity to the situation prevented him or her from being able to identify individual victims. For example, a signaler could report a known potential trafficker, but not have any details about the trafficker's potential victims.

5 In order to protect the identity of survey respondents, Polaris chose not to disclose information about types of trafficking associated with fewer than three survivors.

6 The survey also had sections dedicated to the child welfare system, business regulatory systems, and temporary work visas to help inform other/future Polaris initiatives. This data is omitted from this report.

7 Labor trafficking focus group also covered discussion on temporary work visas in order to inform other Polaris initiatives.

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