

**FORCE MULTIPLIERS: HOW TRANSPORTATION
AND SUPPLY CHAIN STAKEHOLDERS ARE
COMBATting HUMAN TRAFFICKING**

HEARING

BEFORE THE

**COMMITTEE ON COMMERCE,
SCIENCE, AND TRANSPORTATION
UNITED STATES SENATE**

ONE HUNDRED FIFTEENTH CONGRESS

FIRST SESSION

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JULY 12, 2017
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SENATE COMMITTEE ON COMMERCE, SCIENCE, AND TRANSPORTATION

ONE HUNDRED FIFTEENTH CONGRESS

FIRST SESSION

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**FORCE MULTIPLIERS:
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HUMAN TRAFFICKING**

WEDNESDAY, JULY 12, 2017

U.S. SENATE,
COMMITTEE ON COMMERCE, SCIENCE, AND TRANSPORTATION,
Washington, DC.

The Committee met, pursuant to notice, at 10 a.m. in room SR-253, Russell Senate Office Building, Hon. John Thune, Chairman of the Committee, presiding.

Present: Senators Thune [presiding], Nelson, Blunt, Fischer, Sullivan, Capito, Young, Cantwell, Klobuchar, Baldwin, and Cortez Masto.

**OPENING STATEMENT OF HON. JOHN THUNE,
U.S. SENATOR FROM SOUTH DAKOTA**

The CHAIRMAN. Good morning. Thank you all for being here. Today we are going to hear from some remarkable leaders who are working on the ground to combat human trafficking and to help victims.

Human trafficking is a heinous crime that often hides in plain sight. The coercion that traffickers use to manipulate victims is not just happening overseas; it occurs right here in the United States. As the National Human Trafficking Hotline details, cases of human trafficking are annually reported in each of the 50 states and Washington, D.C. It is estimated that human trafficking is a \$150 billion industry globally.

Our hearing today will explore the role of transportation providers, who are fighting the growth of trafficking in the United States, and their ongoing efforts to reduce forced labor in the global economy. Our witnesses have been asked to testify about the challenges and successful strategies in combatting this horrible crime.

Human trafficking takes on many different forms, and the perpetrators use a variety of tools to recruit and control their victims. Victims of human trafficking are often lured with false promises of well-paying jobs, stability, or education. Others are manipulated by people that they trust.

Because the ways in which humans are exploited differ greatly, the responses needed to disrupt and eradicate trafficking also differ. Solutions involve cooperation among industry, the government, and NGOs. No single entity can tackle this problem alone.

In the Senate, my colleagues Senators Cornyn, Grassley, and Klobuchar have been working on legislation, including the Abolish Human Trafficking Act of 2017, which increases the scope of training, targets organized perpetrators, and improves the national strategy to combat human trafficking. As a cosponsor of this legislation, I hope to see it move quickly through the Senate.

Our committee also plays a role in helping solve this problem. The FAA Extension Act, signed into law last year, included a provision requiring enhanced training for flight attendants to recognize and respond to potential human trafficking victims.

This week, Senator Klobuchar and I will introduce complementary bills that would create a lifeline—lifetime ban, I should say, for commercial driver’s license holders convicted of a crime related to human trafficking and improve education and outreach efforts regarding trafficking prevention within the transportation sector.

I anticipate that both of these measures will be on the Committee’s next markup agenda.

As we’ll hear from our witnesses today, greater knowledge, understanding, and awareness are essential for any forward movement in combatting this crime.

Ms. Goetsch, from Truckers Against Trafficking, will discuss her group’s work to educate, equip, and mobilize the trucking industry to combat trafficking as part of their regular jobs.

As consumers, many of us are unaware, I should say, of the potential victims who may come knocking on our door. As Ms. Sorensen, from Polaris, will testify, these victims can often be found in traveling sales crews, domestic work, and commercial cleaning services, just to name a few.

We also may not realize that forced labor might have been used to harness the seafood we regularly enjoy. Mr. Goswami will testify about the Issara Institute’s efforts to assist those who are trapped at sea and oftentimes working without food or pay. He will discuss Issara’s efforts to work with corporate partners who want to ensure their supply chain, not only for seafood, but for all the goods that they sell is free from forced labor.

There is also some significant work being done on the ground in my home state of South Dakota. Organizations such as Call to Freedom and Pathfinder are working to identify gaps in services for human trafficking victims and provide housing and support for victims to regain their lives and independence.

Other organizations in my state, such as Native Hope, are on the ground working to educate and expand awareness during events in South Dakota. They are also working with state and tribal law enforcement to assist vulnerable communities often targeted for trafficking. I commend the efforts of these organizations and their leaders.

I am encouraged by the partnerships and innovative solutions that our witnesses will highlight today. I want to thank you all for being here and for the advocacy and work that you’re engaged in.

So I will turn now to Ranking Member Nelson for any opening statement that he would like to make.

**STATEMENT OF HON. BILL NELSON,
U.S. SENATOR FROM FLORIDA**

Senator NELSON. Thank you, Mr. Chairman.

This is a widespread problem that we need to put all the potential solutions on the table. We're going to look today at how transportation, technology and the supply chain can help prevent the incidence of trafficking. Unfortunately, in my state, we know all too well the consequences.

According to the trafficking hotline, Florida ranks third in the country for the number of cases reported in 2016. The Florida Department of Children and Families also said Florida received more than 1,800 reports alleging the trafficking. That's a 54 percent increase over the year before.

Obviously, this is shocking, but the stories are even worse, especially when we look at the fact that many victims of trafficking are women and children. Minors may be targeted because they've run away from home or have substance abuse problems. The traffickers promise these kids all kinds of things—money, clothes, drugs, housing—and they have no idea the price that they're going to pay.

Since the traffickers prey on desperate and vulnerable people, they seek out places where people won't notice, where it can be difficult to intervene, but then help comes from some unusual places. A Florida truckdriver was traveling through Virginia two years ago at a gas station, and he saw an old RV that stuck out, and he noticed suspicious behavior that made him concerned for a minor female. He called the police. Later he learned that the woman he spotted was a trafficking victim. She had been coerced from Iowa, held against her will, tortured and raped. His quick thinking and attention definitely saved her life.

Groups like the Truckers Against Trafficking train truck drivers to spot signs of trafficking and report the concerns to the hotline. Last Congress, the FAA bill included a provision which Senator Klobuchar championed to require that all flight attendants receive training on how to recognize and respond to trafficking. This Congress, I joined the Chairman and Senator Klobuchar on legislation to improve our response in the transportation sector by increasing awareness, training, and providing a new penalty to discourage trafficking.

I want to thank all of our witnesses for being here. I want to thank Mr. Lares, who came all the way from Florida to speak on the work he does to combat human trafficking in the Orlando area.

Thank you, Mr. Chairman.

[The prepared statement of Senator Nelson follows:]

PREPARED STATEMENT OF HON. BILL NELSON, U.S. SENATOR FROM FLORIDA

Mr. Chairman, thank you for calling this hearing.

Human trafficking is a horrific crime.

It is a widespread problem that requires us to put all solutions on the table.

Today, we will look at how transportation, technology and the supply chain can help prevent and respond to incidents of human trafficking.

In Florida, we unfortunately know the consequences of human trafficking all too well.

According to the human trafficking hotline, Florida ranks third in the country for the number of cases reported in 2016.

The Florida Department of Children and Families also said Florida received more than 1,800 reports alleging human trafficking.

That's a 54 percent increase over the year before.

These statistics are shocking.

But the stories of victims are even worse.

Especially when we look at the fact that many victims of trafficking are women and children.

Minors may be targeted because they have run away from home or have substance abuse problems.

The traffickers promise these kids all kinds of things—money, clothes, drugs, housing—and they have no idea the price they will have to pay.

Since the traffickers prey on the desperate and the vulnerable and they seek out places where people won't notice, it can be very difficult to intervene.

Help can sometimes come from unusual places.

I'll give you an example.

A Florida truck driver was traveling through Virginia two years ago.

At a gas station, he saw an old RV that stuck out and noticed suspicious behavior that made him concerned for a minor female in the RV.

He immediately called the police.

Later he learned that the woman he spotted was a trafficking victim.

She had been coerced from Iowa, held against her will, and subjected to torture and sexual assault.

His quick thinking and attention to suspicious behavior saved her life.

Groups like Truckers Against Trafficking train truck drivers to spot signs of trafficking and report these concerns to the human trafficking hotline.

Last Congress, the FAA bill included a provision, which Senator Klobuchar championed, to require that all flight attendants receive training on how to recognize and respond to potential human trafficking.

This Congress, I joined Chairman Thune and Senator Klobuchar on legislation to improve our response to trafficking in the transportation sector by increasing awareness, expanding training, and providing a new penalty to discourage human trafficking.

I thank all of our witnesses for being here today, especially Mr. Lares, who traveled from Florida to speak on the work he does to combat human trafficking in the Orlando area.

The CHAIRMAN. Thank you, Senator Nelson.

I'm going to turn now to our panel. I want to welcome our witnesses this morning and thank them in advance for their testimony, and ask them to, as much as they can, confine their oral remarks to 5 minutes, and any written statements will obviously be included into the completion in the record, and it will give us an opportunity to ask questions.

But on my left, and your right, we have Ms. Keeli Sorensen, who is Director of Government Relations and Public Policy at Polaris.

Ms. Esther Goetsch, who is Coalition Build Specialist for Truckers Against Trafficking.

Mr. Samir Goswami, who is Technical Consultant, Technology Solutions to Trafficking in Global Supply Chains at the Issara Institute.

And Mr. Tomas Lares, who is Executive Director of Florida Abolitionist and Member of the Greater Orlando Human Trafficking Task Force.

Thank you all so much for being here.

And we will start on my left with Ms. Sorensen, if you will proceed with your remarks. Welcome.

STATEMENT OF KEELI SORENSEN, DIRECTOR, GOVERNMENT RELATIONS AND PUBLIC POLICY, POLARIS

Ms. SORENSEN. Thank you, Mr. Chairman, Ranking Member Nelson, and other distinguished members of the Committee. Thank

you for hosting the hearing on human trafficking, one of the gravest human rights abuses in the United States and globally.

I am grateful for the invitation this morning and to have submitted written testimony to you regarding how human trafficking impacts commercial industries within the United States.

Mr. Chairman, I am the Director of Government Relations and Public Policy at Polaris, which operates the National Human Trafficking Hotline you've already referenced this morning. It's a project of the U.S. Department of Health and Human Services. We also operate the Polaris-owned BeFree Textline. Polaris also builds the capacity of other hotlines globally, creating an environment in which victims of human trafficking can safely signal for help anytime, anywhere.

Mr. Chairman, my written statement outlines an overview of the human trafficking cases Polaris has learned about by operating these U.S. helplines, specifically noting the cases that are occurring in or facilitated by online technology, transportation systems, and the hospitality sector, all critical supply chain stakeholders. I ask that my full statement be made part of the record.

With more than 10 years of experience assisting exploited and trafficked populations in the United States and internationally, I've seen firsthand how this issue impacts vulnerable men, women, and children. Working with the survivors in the United States specifically, I've witnessed the way that the transportation and hospitality industries have facilitated this crime.

Thomas is a survivor I met years ago whose name I've changed to protect his identity. He had long dreamt of leaving his home in South Asia to work in the United States. He was approached by a labor recruiter who asked him for \$5,000 to secure a lucrative job at a hotel resort in the south, but when he arrived in the U.S., he was told that the job no longer existed. Instead, he was put on a bus to the Midwest and traveled for 3 days with no money for food or water.

He arrived in a small town and was told that he had to clean rooms for two different hotels for 15 to 18 hours per day at a significantly lower wage than he was promised. He was constantly monitored and threatened with deportation. He lived with several other men in a dingy single room and was driven from job site to job site with no independence. Thomas worried for his family and was unsure how he would repay his debt to his recruiter.

Thankfully, he learned about human trafficking and his victim status, and he was able to seek help. He successfully sought redress, and eventually was reunited with his family.

Thomas's story shares commonalities with other cases of human trafficking, whether across the hospitality sector or beyond. In many cases, there are multiple opportunities for authorities and other stakeholders to intervene in order to prevent or stop the crime. To do so effectively requires a nuanced understanding of how human trafficking manifests across the country.

Polaris recently published a report called "The Typology of Modern Slavery: Defining Sex Trafficking and Labor Trafficking in the United States." The report analyzed 32,000 cases of human trafficking that we've learned about by operating the U.S. helplines, and identified a framework of 25 unique types, 18 types of labor

trafficking and 7 types of sex trafficking. Through this research, Polaris identified 2,894 human trafficking cases that had some level of involvement with website or Internet locations, 3,012 cases intersecting with hotels and motels, and 909 cases involving transportation systems.

The typology lays the groundwork for tailored prevention and disruption efforts that can be organized by human trafficking type or by issue area that frequently emerge across types. We believe that supply chain transparency is one such cross-type issue area that requires increased investment from policymakers. Within the transportation and hospitality industries, there has been recognition of the problems, and there have been efforts to step up.

We have partnered with Marriott International and Wyndham Hotels, the American Hotel and Lodging Association, and Delta Airlines, to name a few. They work to identify and respond to cases of human trafficking. Our hope is that we will expand the nature of these partnerships in this and in other sectors to increase basic supply chain prevention efforts as well.

A full list of recommendations for your consideration have been submitted in my written testimony, but in conclusion, I'll reflect just one more core thing. Congress has the ability to require mandatory publication of supply chain information across sectors. Federal legislation should build on the California supply chain—sorry—California Transparency and Supply Chains Act, and the more recent U.K. Modern Slavery Act and French law on corporate vigilance.

Furthermore, Executive Order 13627 and the National Defense Authorization Act for Fiscal Year 2013 both require government contractors to create compliance plans to prevent human trafficking in the U.S. Government supply chain. Designating training and enforcement within government agencies, which I've seen in the draft of the bill that the Chairman and Ranking Member Nelson and Senator Klobuchar are proposing soon would be an example of this, designating training and enforcement within government agencies, like the Department of Transportation, would provide an extra layer of needed oversight to ensure that compliance plans are effectively upheld.

Thank you, Mr. Chairman and the members of this Committee, for your attention to this critical issue. Polaris looks forward to working with you and to ensure that the U.S. Government continues to be a global leader in the fight to end human trafficking.

[The prepared statement of Ms. Sorensen follows:]

PREPARED STATEMENT OF KEELI SORENSEN, DIRECTOR, GOVERNMENT RELATIONS
AND PUBLIC POLICY, POLARIS

Mr. Chairman, Ranking Member Nelson, and other distinguished members of the Committee, thank you for hosting this hearing on human trafficking, one of the gravest human rights abuses in the United States and globally.

I want to thank the members of the Committee for the opportunity to submit written testimony regarding human trafficking and how it impacts select commercial industries within the United States.

Mr. Chairman, I am the Director of Government Relations and Public Policy at Polaris, a leading anti-human trafficking organization that works to eradicate all forms of modern slavery. Grounded in data gathered from the lived experiences of survivors, Polaris responds to victims of human trafficking effectively and immediately, equips key stakeholders and communities to address and prevent human

trafficking, and disrupts the business of human trafficking through targeted intervention initiatives grounded in the data Polaris collects and analyzes about the crime.

Polaris operates public channels of communication, including the National Human Trafficking Hotline (The Hotline), a project of the U.S. Department of Health and Human Services, and Polaris's BeFree Textline. We also build the capacity of other hotlines globally, creating an environment in which victims of human trafficking can safely signal for help—anytime, anywhere. In doing so, Polaris contributes to the creation of a safety-net for survivors, connecting them to life-saving services, while also collecting data about the crime of human trafficking that is then analyzed for actionable insights aimed at disruption.

Polaris cultivates and stewards trusted partnerships across a region, mapping the ecosystem and establishing response protocols with relevant stakeholders (*e.g.*, law enforcement, service providers, survivors, etc.), building a safety-net that can effectively serve survivors and pursue tips. Secondary benefits of ecosystem mapping include a detailed understanding of where gaps in services and trained professionals exist, thus informing public policy, influencing the flow of funds to communities, and encouraging multi-stakeholder collaboration.

Having responded to over 155,000 signals (calls, texts, webforms, and e-mails), Polaris now has one of the largest data sets on how and where human trafficking occurs in the United States. Recognizing that this data provides strategic insights for how to disrupt human trafficking networks, for the past three years, Polaris's Data Analysis Program has worked to standardize our data collection, package these standards for other hotlines and organizations around the world, and create global data sharing partnerships. Over time, these data-sharing platforms and analytics will offer Polaris and the broader field a global map and taxonomy of human trafficking operations, informing collaborative and holistic regional response and intervention activities.

Codifying and implementing a data collection process, while an important first step, will not alone flip the low risk/high profit equation. The analysis of the data—and more specifically, identifying, mapping, and naming the unique sub-types of trafficking—is what enables meaningful disruption.

In March of 2017, Polaris published *The Typology of Modern Slavery: Defining Sex and Labor Trafficking in the United States (Typology Report)*. This report identified a framework of 25 unique types of human trafficking, each with the potential for numerous sub-types. This framework creates a new organizing principle that lays the groundwork for tailored prevention and disruption efforts, providing actionable insights to critical stakeholders seeking to inform and spur systemic action, better enabling diverse stakeholders to combat the crime within their spheres of influence.

The Typology Report analyzed more than 32,208 cases of human trafficking documented between December

2007 and December 2016 on the National Human Trafficking Hotline and BeFree Textline. This is the largest data set on human trafficking in the United States ever compiled and publicly analyzed.¹ Data from 55 percent of potential human trafficking cases are classified into distinct types. Case types range from escort services to domestic work, traveling sales crews to construction and landscaping. Some cases involve both commercial sex and forced labor. Some traffickers may use only one business model, while other traffickers may use several. For example, a trafficker sometimes may force a victim to engage in commercial sex in outdoor locations such as truck stops, and other times use an escort service model to force the victim to engage in commercial sex at hotels.

The types tend to be more fluid in sex trafficking cases, and traffickers can be nimble and responsive to disruption efforts by changing their business models. Because many victims of labor trafficking are unaware that they are the victim of a crime or that there is a hotline to call for help, and because public awareness of labor trafficking is limited, the National Human Trafficking Hotline and Polaris's BeFree Textline received fewer calls about labor trafficking than sex trafficking. Only 16 percent of the cases identified on these hotlines involved labor trafficking. However, it is important to note that, globally, the International Labor Organization

¹The data do not represent the full scope of human trafficking—a lack of awareness of the crime or of these hotlines in certain geographic regions, by particular racial or ethnic groups, and by labor trafficking survivors can lead to significant underreporting. Nonetheless, this information allowed us to expose the vulnerabilities in network business models and understand the ways that traffickers leverage and exploit legitimate businesses or institutions—such as social media, hotels, financial institutions, transportation systems, and government visas.

statistics state that labor trafficking is more prevalent than sex trafficking.² Polaris strongly believes that labor trafficking cases in the United States are chronically underreported due to a lack of awareness about the issue and a lack of recognition of the significant vulnerability of workers in many U.S. labor sectors.

Of the data classified into distinct types, a range of sectors, both illicit and legitimate, were represented in the cases of human trafficking. The most reported type of human trafficking was escort services, a broad term used widely in the commercial sex trade, referring to commercial sex acts that primarily occur at temporary indoor locations. We received 4,651 reports of this type of sex trafficking. Following that type was illicit massage, health and beauty with 2,949 cases. This type of trafficking presents a facade of legitimate spa services, concealing that their primary business is the sex and labor trafficking of women. We received 1,643 cases of human trafficking related to outdoor solicitation for commercial sex and 1,290 cases related to forced commercial sex within residential brothels. We also noted 1,190 cases of domestic or homecare workers providing cooking, cleaning, and caretaking services.

Over the course of our research, Polaris noted the trafficker profiles, recruitment methods, victim profiles and methods of control unique to each type of trafficking. This research also enabled us to record the frequency with which human trafficking occurs in, or intersects with a variety of sectors. Some of these venues willingly engage in exploitation, but in most cases they unwittingly facilitate human trafficking due to a lack of oversight or a failure to understand the signs. Three key sectors that traffickers take advantage of include online technology, transportation systems, and the hospitality industry (hotels and motels).

Human Trafficking and the Internet

The Internet plays a significant role in the recruitment of victims and the advertisement of human trafficking. Between December 7, 2007, and April 30, 2017, Polaris learned about 2,894 human trafficking cases that had some level of involvement with website/Internet locations at any point during the exploitation. Examples of human trafficking types include:

- Remote Interactive Sexual Acts
- Illicit Massage, Health, & Beauty Services
- Escort Services
- Arts & Entertainment
- Bar, Strip Clubs, & Cantinas
- Domestic Work
- Illicit Activities
- Personal Sexual Servitude
- Residential Sex Trafficking
- Outdoor Solicitation
- Pornography

During this time, Polaris also received reports of 104 cases of cybersex trafficking—where minors and adults are made to perform sex acts in front of a webcam as it is livestreamed to consumers.

The Internet has become a place where traffickers advertise commercial sexual services with relative anonymity, providing an easy and cost-effective way to reach a wide selection of customers. Polaris regularly hears from survivors that they were advertised for commercial sex on a number of websites. One website which advertises commercial sex services listed nearly 12,000 national ads on a single day in 2014. In escort service sex trafficking alone, Polaris learned about 1,795 cases that involved victims being advertised online. For more than five years, Polaris has raised serious concerns about how sex trafficking victims have been advertised online. We have served victims sold on websites in our programs, and we received nearly 2,000 reports of likely sex trafficking cases involving advertising websites through the National Human Trafficking Hotline. There are numerous online sites operating programs advertising commercial sex and we suspect that many of those advertised are sex trafficking victims.

Polaris also received reports from 693 victims who specifically stated that they were recruited into their situation via the Internet. However, we've also found that victims are using the Internet to reach out for help, as in the case of the National

² http://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_182109/lang-en/index.htm

Human Trafficking Hotline reporting webform. From helpline victim record data, Polaris learned that 679 victims had access to mobile applications and social media during their trafficking situation. This access can and should be leveraged to help victims find assistance.

Organizations assisting at-risk populations have also built online education tools to better protect individuals from severe exploitation. A close partner to Polaris called Centro de los Derechos del Migrante collaborated with internationally recruited migrant worker leaders across Mexico and the United States to build *Contratados.org*, a website that provides migrant workers with a space to share and access previously unavailable information about recruitment and employment under the H-2 visa program. The project makes the recruitment system transparent and gives workers and advocates access to a Yelp-like review that migrant workers write based on their personal recruitment and employment experiences. Creative tools like *Contratados* can help transform the Internet from a place of potential exploitation to a source of education and empowerment.

Furthermore, Polaris encourages law enforcement to bring charges against online platforms that knowingly create content that facilitates the sale of minors or adults being sex trafficked. In 2016, the Senate Permanent Subcommittee on Investigations published a report describing evidence that Backpage had edited or modified ads before they posted them—sometimes in order to conceal that commercial sex acts were being offered for money, and sometimes even to conceal the sale of someone who was a minor. It's been suggested that that's proactive facilitating behavior and negligence by Backpage, including clear knowledge that they knew sex trafficking was happening on their site. These are alarming findings and require immediate additional investigation.

Hospitality Industry (Hotels & Motels) Intersection with Human Trafficking

Between December 7, 2007, and April 30, 2017, Polaris operated hotlines identified 3,012 cases of human trafficking that intersected with hotels and motels (at some point during the course of the crime) including:

- Traveling Sales Crews
- Outdoor Solicitation
- Escort Services
- Hospitality (labor)
- Begging and Peddling Rings
- Arts & Entertainment
- Construction
- Domestic Work
- Commercial Cleaning Services
- Residential Sex Trafficking
- Illicit Massage, Health, & Beauty Services
- Bars, Strip Clubs, & Cantinas
- Personal Sexual Servitude
- Restaurant & Food Service
- Pornography
- Illicit Activities (labor)

Hotels and motels are the most commonly reported venue for sex trafficking situations involving U.S. citizen victims. These sites allow for buyer confidentiality, since buyers can park at and enter these establishments without oversight. These locations also allow for traffickers to function without being responsible for facility maintenance, enabling them to move between locations avoiding detection. Of the 5,199 escort services cases Polaris learned about operating the National Human Trafficking Hotline and the BeFree Textline, 2,225 of these cases were based in hotels and motels. Stopping this type of trafficking is heavily dependent on eliciting the support and intervention of hospitality staff.

As discussed in Polaris's Typology Report, labor trafficking is both present in the hotel industry's workforce and in its product supply chain. Since 2007, Polaris has learned about 124 cases of labor trafficking taking place directly on the grounds of hotels and motels. Traffickers have included hotel management or those who manage labor recruitment agencies that subcontract with hotels to provide cleaning or groundskeeping services. If the trafficker is a contractor, the hotel may not be aware of the abuse. Most commonly, workers were recruited with job offers that misrepres-

mented the working conditions, wages, and the ability to safely leave the job. In other cases, workers were recruited via other fraudulent promises. Most victims are women and men from Jamaica, the Philippines, and India, and typically they are told that they will make lucrative wages to support family back home. Most victims enter the job with an H-2B visa, which restricts visa portability, tying victims to their abusive employer. J-1 visas are also used, though less frequently. U.S. citizen victims have also been reported.

In addition to labor trafficking happening in hotels and motels, one lesser known type of labor trafficking that is extremely reliant on the hospitality sector to maintain operations is traveling sales crews. Polaris operated helplines identified 605 cases of labor trafficking occurring within traveling sales crews, which rely almost exclusively on hotels and motels to house their victims. Sales crews move between cities and states and go door-to-door, often selling fraudulent products such as magazine subscriptions that customers may never receive. The young salespeople (one-third of which have been minors) sell from morning until night and are controlled by traffickers who deny them food and restrict after-hours activity, including their sleep arrangements at hotels and motels. Data shows numerous linkages between sales crews and a larger national business network. It can be challenging to find these links because many organizations, particularly those with a long record of fraud-related complaints, frequently change their names and operating locations while remaining under the same ownership. (Please see *Knocking At Your Door: Labor Trafficking on Traveling Sales Crews* for more information.)

With the input of survivors, industry leaders, and subject matter experts, Polaris has developed a set of recommendations that we believe can help raise awareness and, in turn equip and empower hotel owners and employees to help put a stop to human trafficking. Those recommendations are as follows (from *Hotel Industry Fact Sheet*):

Recommendations for the Hotel Industry

1. **Formally Adopt A Company-Wide Anti-Trafficking Policy:** Adopt a policy that articulates your 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 your 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. Once adopted, the policy should be clearly communicated and implemented at all levels, to ensure there is no human trafficking on-site, within your workforce, or within your company's sourcing/procurement supply chains.
2. **Train Staff On What To Look For And How To Respond:** Training is essential to identify and respond to human trafficking in your business. Education should occur annually, at the point of hire, and include staff at all levels (property owners, general managers, and line staff), to identify when a suspicious situation may be human trafficking. Trainings should incorporate internal processes and protocols for how to respond to and report human trafficking.
3. **Establish A Safe & Secure Reporting Mechanism:** Frontline staff, franchisees and vendors/suppliers need a safe and secure method to report concerns as they arise without fear of retaliation.
4. **Develop A Response Plan For Your Business:** Concerns of human trafficking or severe labor exploitation need to be taken seriously, investigated in a timely fashion, and remediated as quickly as possible. Develop an internal process for responding to and reporting human trafficking when it is suspected on-site, within your workforce, or within your supply chains.
5. **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 and forced labor –two forms of human trafficking that have been found in the hotel industry. If it's not possible to directly hire, know your subcontractors and their recruitment practices well; don't tolerate abusive practices.
6. **Work With Suppliers And Vendors Who Responsibly Source Their Products:** Human trafficking can occur within your hotel's procurement or vendor's supply chains. Whenever possible, strive 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 your next trade show.
7. **Contact The National Human Trafficking Hotline (1-888-373-7888) and BeFree (233733) Texting Helpline:** These national resources are available nationwide, toll-free, 24 hours a day, with tele-interpreting in over 170 languages

for help or to report a situation of trafficking. Our trained call specialists are equipped to assess, provide safety planning, and refer to our network of trafficking experts across the United States for a targeted, victim-centered response.

Polaris partners with leaders in the hospitality sector who have taken strides to tackle this issue, including Wyndham Hotels. Of particular note is our partnership with the American Hotel and Lodging Association (AHLA), Marriott International, and ECPAT-USA to make available a co-created training that addresses the issues of human trafficking as they intersect with the hospitality industry. The program defines human trafficking and commercial sexual exploitation of children, helps employees identify individuals who are most at risk for human trafficking, builds an understanding between labor and sex trafficking specific to the hotel sector, and explains the role of hospitality employees in responding to this issue.

Moving forward, Polaris recommends that—at a minimum—hotels, franchisees, and smaller independent lodging establishments mandate trainings including the identification of victims and establishing and enforcing policies for obtaining goods and services free of forced labor.

Transportation Industry Intersections with Human Trafficking

Almost every type of human trafficking, at some point in the recruitment or exploitation phase of the situation, involves the trafficker or victim using transportation routes. Victims find themselves taking buses, taxis, trains, and planes during the course of their trafficking experience. It is therefore imperative that transportation industry actors—bus operators, train conductors, toll booth operators, highway patrol officers, airline staff, and truckers take every step possible to educate themselves on the signs of human trafficking.

From December 7, 2007, until April 30, 2017, the National Human Trafficking Hotline and the BeFree Textline learned about 909 human trafficking cases involving the following transportation systems (non-cumulative, some cases involve multiple systems):

- Buses: 407 Cases
- Taxi/Commercial Driving Service: 142 Cases
- Train/Rail: 76 Cases
- Train/Metro: 42 Cases
- Airlines: 317 Cases
- Cruise Ships/Cargo Ships: 21 Cases

Of these cases, 24 represent labor trafficking cases directly occurring within the transportation industry (*e.g.*, trucking, shipping, taxi drivers, cruise ships, etc.).

As mentioned above, there are several labor trafficking types that rely heavily on mobile contract labor also known as “crews.” Crews tend to be transported frequently from one worksite to another and are often found in human trafficking cases related to construction, landscaping, forestry, commercial cleaning services, and home health care. While we lack sufficient information on what exact modes of transportation contractors use to transport victims, it’s clear that they rely on the infrastructure of streets, tolls, tunnels, bridges, etc. Carnival crews, while they are not sub-contractors, engage in regional travel as a core component of their business model and are at high-risk of trafficking. Additionally, Polaris has noted 142 cases human trafficking for domestic work that have connections to transportation systems such as airlines, taxis, buses, and trains. These systems were accessed at every phase of the trafficking situation: to facilitate a victim’s entry into the exploitative situation, used during the exploitation (we often see domestic workers take taxis and public buses to grocery shop and run errands), or to escape a trafficking situation.

Traffickers are also dependent on transportation systems and roadways to facilitate sex trafficking. Between December 7, 2007, and April 30, 2017, Polaris identified 1,179 cases of trafficking in the escort delivery model, whereby traffickers deliver victims to a buyer’s hotel room or residence. We also identified 1,079 cases of street-based commercial sex and 667 cases of truck stop sex trafficking. Cases of sex trafficking related to illicit massage businesses recruit many victims from Southeast Asia who often intersect with airline services when coming to the U.S., either at the start of, or immediately prior to being trafficked. However, further research is needed to determine which percentage of these interactions act as entry points to the trafficking situation versus a new location. There is anecdotal evidence of traffickers using interstate bus lines to move women between illicit massage businesses. More

research is required to understand the level of involvement, if any, that these companies and/or drivers have with the traffickers.

Buyers also engage transportation systems to access victims of forced commercial sex services. For organized residential brothels, limited data may suggest that buyers are using taxis and other commercial driving services in their visits to brothels in order to conceal their identity and not expose their license plates to possible detection.

Thankfully, the transportation industry has acknowledged the presence of human trafficking in this sector and is taking steps to address it. Polaris has worked with industry leaders to improve awareness about human trafficking. We consulted as key advisors to the U.S. Department of Transportation's "Putting the Brakes on Human Trafficking" campaign, the U.S. Department of Homeland Security's "Blue Lightning" campaign, partnered with taxi associations to identify trafficking in the City of Houston, and partnered with organizations like Truckers Against Trafficking as they engage truckers across the country, to name a few. Many of these partners encourage victims or those reporting tips to contact the National Human Trafficking Hotline. As a result, the Hotline continues to receive an ever increasing number of reports from victims or those wishing to help intervene in a situation.

In 2017, Polaris launched a partnership with Delta Airlines to highlight and increase general awareness about the 25 types of human trafficking and how the airline industry might be exploited or used illicitly to facilitate it. Delta also established a special SkyMiles program offering its customers the ability to donate SkyMiles to Polaris to provide airline tickets to support survivors of trafficking to travel to their home country, to receive critical services, reunite with children or family, or engage in survivor leadership opportunities.

To date, much of the private and public transportation sector engagement has focused on building awareness about the issue and increasing victim identification. However, it is common on the Polaris operated helplines to engage with victims and survivors who lack transportation to shelters or other critical resources. For example, the National Human Trafficking Hotline managed a case of two male labor trafficking victims in a rural town whose closest access to shelter was a three-hour drive away. The men had no money to reach the shelter. The Hotline had to work with local police to drive the men to the shelter. Where possible, we would encourage the public and private transportation sectors to identify ways to increase cost-effective or free transportation options to connect victims and survivors with critical resources and services.

Conclusion

In 2016, reports of human trafficking cases in the United States to the National Human Trafficking Hotline jumped 37 percent, reaching over 7,500 cases for the year. The Hotline received almost 27,000 calls in 2016, up 22 percent from 2015. In just under a decade, we have seen calls to the National Hotline increase by nearly 650 percent.

As awareness about this issue grows, Polaris expects human trafficking reports to increase. It will be critical for Congress to continue to provide adequate financial assistance to direct service programs to ensure support for the brave individuals seeking help. The Senate has introduced two complimentary bills: S. 1311, the Abolish Human Trafficking Act of 2017 led by Senators John Cornyn and Amy Klobuchar; and S. 1312, the Trafficking Victims Protection Act of 2017 led by Senators Chuck Grassley and Dianne Feinstein, which among other things, reauthorize critical funding for victim service programs through the Department of Justice and the Department of Health and Human Services. Most significantly, both of these bills reauthorize the Trafficking Victims Protection Act of 2000 in a bipartisan, uncontroversial manner. Polaris urges Congress to continue working to ensure this legislation remains bipartisan and focused on consensus-based ideas aimed at combating trafficking and most specifically, assisting victims.

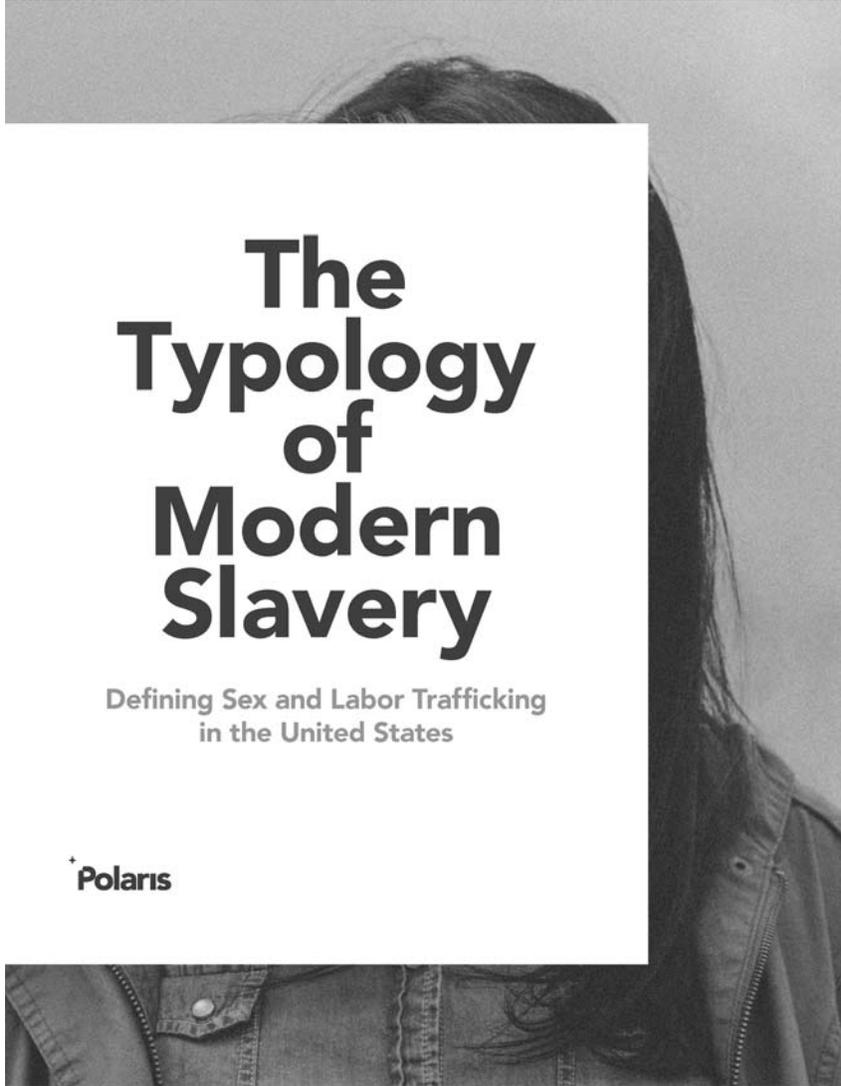
Congress should also make every effort to build a comprehensive understanding of the ways that this crime manifests in the United States. Polaris encourages congress to authorize funding for a holistic national prevalence study to try to determine the true size of the human trafficking issue in the United States. Making this a priority will provide both government, private sector, and advocates with an accurate account of the crime so we can best direct resources to prevent and disrupt it.

In the meantime, Polaris continues to work with other international and national organizations to build out new datasets on human trafficking. One such initiative is the Counter-Trafficking Data Collaborative (CTDC), led by the International Organization for Migration and Polaris. The CTDC, launching later this year, will provide an open source, multi-stakeholder repository of data on human trafficking. Initially, the dataset will comprise information from IOM's global victim assistance

database and Polaris's data. Anonymized datasets will be available for download and will be compatible with analysis software. We encourage Congress to support data efforts like this wherever possible.

Private industry sectors should make every effort to ensure that their supply chains (made up of labor services and procured goods) are free of forced labor. Congress has the ability to require mandatory publication of supplier information. This should build on the California Transparency in Supply Chains Act and the more recent U.K. Modern Slavery Act and French law on corporate vigilance. Furthermore, Executive Order 13627 and the National Defense Authorization Act for Fiscal Year 2013 both require government contractors to create compliance plans to prevent human trafficking in the U.S. Government supply chain. Designating training and enforcement within government agencies, including the Department of Transportation and others would provide an extra layer of oversight to ensure that compliance plans are effectively upheld.

Thank you, Mr. Chairman, and the members of the Committee, for your attention to this critical issue. Polaris looks forward to working with you to ensure that the U.S. Government continues to be a global leader in ending human trafficking.



The Typology of Modern Slavery

Defining Sex and Labor Trafficking
in the United States

⁺ Polaris

**The
25 types
of modern
slavery**



The Typology of Modern Slavery

Defining Sex and Labor Trafficking
in the United States

March 2017

**“These are the tools
that survivors
and advocates need
to revolutionize a
movement and put
an end to modern
slavery.”**

Rebecca Bender,
Survivor Advocate and CEO/Founder
of the Rebecca Bender Initiative

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Introduction

For the last 15 years, people in the modern anti-trafficking field have struggled to identify and disrupt human trafficking networks in the United States. This movement to stop modern slavery has confronted many challenges, and one of the most significant has been the absence of data that shows how human trafficking operates.

To eradicate human trafficking networks and help survivors, we must be able to identify and disrupt the manifestations of trafficking in our communities.

From sex trafficking within escort services to labor trafficking of farmworkers, the ways humans are exploited differ greatly. Each type has unique strategies for recruiting and controlling victims, and concealing the crime.

For years, we have been staring at an incomplete chess game, moving pieces without seeing hidden squares or fully understanding the power relationships between players. Many efforts to combat trafficking have generalized across too many types and created overly generic resources and responses. For example, if an anti-trafficking group is providing a training for hotels, generic "Human Trafficking 101" training is less effective than training that focuses on the types of trafficking that actually use hotels as part of their business model.

With *The Typology of Modern Slavery*, our blurry understanding of the scope of the crime is now coming into sharper focus.

Polaris analyzed more than 32,000 cases of human trafficking documented between December 2007 and December 2016 through its operation of the National Human Trafficking Hotline and BeFree Textline. This is the largest data set on human trafficking in the United States ever compiled and publically analyzed.

Polaris's research team analyzed the data and developed a classification system that identifies 25 types of human trafficking in the United States. Each one has its own business model, trafficker profiles, recruitment strategies, victim profiles, and methods of control that facilitate human trafficking.

Cases of modern slavery are diverse and involve complex situations, and many cases lacked sufficient detail to be easily classified. We invite input from survivors, experts and practitioners in the field to help refine this classification system and make it even more accurate.

From sex trafficking within escort services to labor trafficking of farmworkers, the ways humans are exploited differ greatly. Each type has unique strategies for recruiting and controlling victims, and concealing the crime.

Polaris's data-driven *Typology* segments the market of human trafficking beyond the existing categories of sex trafficking and labor trafficking, revealing the dozens of manifestations of how traffickers control and exploit others for profit. Breaking up modern slavery into types allows us to expose the vulnerabilities in network business models and understand the ways that traffickers leverage and exploit legitimate businesses or institutions - such as social media, hotels, financial institutions, transportation systems, and government visas.

With this greater understanding, we can begin to develop strategic campaigns to spur systematic action, unite disparate efforts, allocate limited resources, and facilitate effective interventions to combat the crime. We can close policy loopholes and adopt safeguards that make it more difficult for bad actors to abuse vulnerable and at-risk populations. Cities and communities that want to take action can better understand which of the 25 types are present in their area and design more targeted campaigns. Recognizing the heterogeneity of the survivor experience also creates more pathways for meaningful engagement of lived experience in each type. Smart, targeted interventions can be coordinated and directed at specific types of trafficking, reducing the chance that human trafficking continues to be a low-risk, high-profit crime.

The Typology of Modern Slavery offers a map for taking the next steps in creating a world without slavery.

**The Typology
of Modern Slavery
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taking the next steps
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without slavery.**

Methodology

The data used to develop the 25 types in *The Typology of Modern Slavery* came from calls, emails, and webforms received by the National Human Trafficking Hotline, operated by Polaris, as well as texts received by Polaris's BeFree Textline.

Between December 7, 2007, and December 31, 2016, Polaris-operated hotlines received 32,208 cases of potential human trafficking and 10,085 potential cases of labor exploitation in the United States.

Expanding on the traditional broad categories of sex trafficking and labor trafficking, Polaris used this new data to identify 25 unique types of trafficking. Our research team studied the systems and tactics that individual trafficking networks use to conduct their business, analyzing six principal factors for each: business model, trafficker profiles, recruitment practices, victim profiles, methods of control, and geographic patterns. Data from 55 percent of potential human trafficking cases and 60 percent of labor exploitation cases is classified into distinct types.

The remaining cases could not be classified for reasons such as caller safety, privacy considerations, or limited data. For example, when Polaris hotline staff receive calls from 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. Individuals are never asked questions specifically for data collection purposes and are asked to share only the information that they are comfortable providing for the purposes of helping them get help and stay safe. Polaris-operated hotlines abide by strict confidentiality policies and will not release identifying information, even to law enforcement or service providers, without the caller's consent, except when we suspect child abuse or if we have reason to believe that the caller or others face imminent harm.

The information contained in this document was obtained through Polaris's interactions with individuals contacting the hotlines, as well as some additional public sources, and is not the result of a proactive, randomized survey of the landscape of human trafficking. Such a survey is not currently possible with the limited data available to the human trafficking field and the hidden nature of the crime.

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Some human trafficking involves both commercial sex and forced labor. Some sex traffickers may use only one business model, while other sex traffickers may use several. For example, a trafficker sometimes may force a victim to engage in commercial sex in outdoor locations such as truck stops, and other times use an escort service model and force the victim to engage in commercial sex at hotels. The types tend to be more fluid in sex trafficking cases, and traffickers can be nimble and responsive to disruption efforts by changing their business models. These statistics are non-cumulative. Cases may reference multiple victim populations, and in some cases demographic information was not provided.

Polaris staff also analyzed cases of potential labor exploitation reported to hotlines. In these cases, workers endure a wide range of abuses that put them at high risk for labor trafficking. These abuses include wage and hour violations, contract violations, sexual harassment, discrimination, child labor violations, and unsafe working conditions. We did not hear of explicit indicators of force, fraud, or coercion in these cases, and thus they were not classified as labor trafficking. Individual callers' work experiences range from fair, compensated labor spattered with isolated or minor violations, to more significant exploitation or wage theft, and finally to systematic or extreme conditions that meet the definitions of labor trafficking and slavery.

Because many victims of labor trafficking are unaware that they are the victim of a crime, or that there is a hotline to call for help, and because public awareness of labor trafficking is limited, the National Human Trafficking Hotline and BeFree Textline received fewer calls about labor trafficking than sex trafficking. Only 16 percent of the cases identified on these hotlines involved labor trafficking. However, it is important to note that, globally, forced labor is believed to be more prevalent than sex trafficking. Polaris strongly believes that labor trafficking cases in the U.S. are chronically underreported due to a lack of awareness about the issue and a lack of recognition of the significant vulnerability of workers in many U.S. labor sectors.

Trafficking cases are diverse and complex. While Polaris recognizes that traffickers use a wide variety of methods to exploit their victims, we have created these 25 classifications based on the data, determining the most common and distinct models that have been reported. We invite input into this classification system and hope it furthers our joint efforts to end human trafficking.

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Type Profiles

01

Escort Services



Description and Business Model

Escort Services is a broad term used widely in the commercial sex trade, referring to commercial sex acts that primarily occur at a temporary indoor location. The operations are often described as “out-call,” where traffickers deliver victims to a buyer’s hotel room or residence for “private parties,” or as “in-call,” where potential buyers cycle in and out of a hotel room where the trafficker has confined the victim for extended stays. These cyclical business operations repeat once the trafficker relocates the survivor to another city where the demand for commercial sex is booming. Over the years, there have been fluctuations in popular online advertising platforms for commercial sex, but the most prevalent online marketplace is Backpage.com. Though Backpage closed its U.S. Adult Services section in January 2017 due to rising pressure from the U.S. Senate, Backpage has accounted for more than 1,300 cases of trafficking within escort services and remains a driving force in global sexual exploitation.



Trafficker Profile

Trafficker profiles range from a single trafficker exploiting their victim (often their intimate partner) to coordinated networks of traffickers affiliated with organized crime. All traffickers employ force, fraud, and coercion.

Recruitment

Victims may be tricked into a situation through fraudulent job offers, such as fake modeling contracts. Traffickers may also recruit victims by pretending to have a romantic interest in the victim or falsely promising that they can provide shelter, financial support, or other benefits.

Victim Profile

The vast majority of the survivors of "escort services" are U.S. citizen women and girls, although men and boys also make up a small percentage. LGBTQ youth are also vulnerable, as shown by the Urban Institute's 2015 report, "Surviving the Streets of New York", in which homeless LGBTQ youth reported trading sex through online ads and social media, at hotels, and at customers' residences.

Methods of Control

Extreme physical and sexual violence, often accompanied by weapons, is common, as is coercion in the form of unmanageable quotas, debts, threats of harm or police involvement, excessive monitoring, gang intimidation, social isolation, and constant surveillance. Traffickers often condition victims to believe they are the only ones who care for them, manipulating an attachment bond that makes the decision to leave the trafficker extremely difficult.

Victims may be tricked into a situation through fraudulent job offers, such as fake modeling contracts.

¹ Meredith Dank et al., *Surviving the Streets of New York: Experiences of LGBTQ Youth, YMSM, and YWSW Engaged in Survival Sex* (Washington: Urban Institute, 2015); www.urban.org/sites/default/files/alfresco/publication-pdfs/2000119-Surviving-the-Streets-of-New-York.pdf



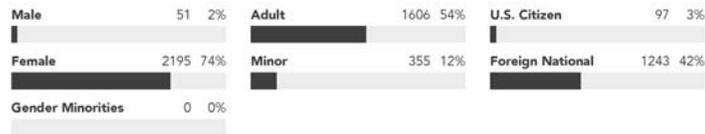
02

Illicit Massage, Health, & Beauty



Description and Business Model

Illicit massage, health, and beauty businesses present a façade of legitimate spa services, concealing that their primary business is the sex and labor trafficking of women trapped in these businesses. Although they appear to be single storefronts, the majority are controlled as part of larger networks – with one to three people owning several businesses at a time. Research suggests there are at least 7,000 storefronts in the U.S., and possibly far more.



Trafficker Profile

On-site managers tend to be women of the same ethnicity and may have been trafficked themselves in these businesses before becoming part of the larger trafficking network. The similarity in age and ethnicity of managers and women who are managers-in-training can make it difficult to distinguish potential victims from potential controllers at a glance. This can add to the level of control and coercion that traffickers have over their victims. Preliminary research suggests that business owners may have a variety of racial and ethnic profiles, as noted, business owners often own several illicit massage businesses as part of a larger network.

Recruitment

These networks are connected to larger operators that assist with recruitment of women in their home country or women who are searching for work in the United States as immigrants with limited English.

Victim Profile

Most victims of illicit massage businesses are women from the mid-thirties to late fifties from China and South Korea. In other illicit health and beauty businesses, labor trafficking survivors are typically younger females (mid-twenties and older) from Southeast Asia.

Methods of Control

Survivors are controlled through coercion, including extreme intimidation, threats of shame, isolation from the outside community, debt bondage, exploitation of communication barriers, and explicit as well as implied threats. Women are typically forced to live at the business or in another location with their movement controlled between work and home. Day-to-day actions tend to be monitored by a manager, who watches the store in person or off-site with a CCTV camera.

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03

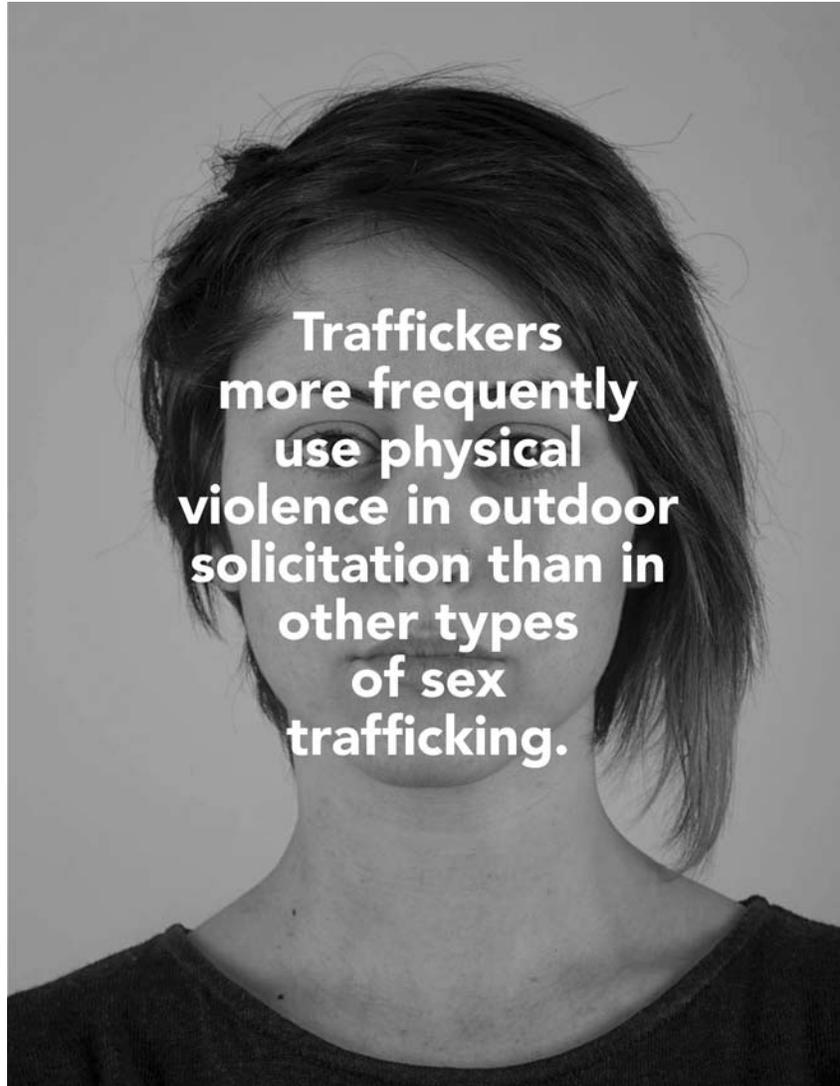
Outdoor Solicitation



Description and Business Model

Outdoor solicitation occurs when traffickers force victims to find buyers in an outdoor, public setting. In many cities, this occurs on a particular block or at cross streets known for commercial sex and often referred to as a “track” or “stroll.” In more rural areas, outdoor solicitation frequently takes place at truck or rest stops along major highways.





Trafficker Profile

These individuals tend to operate more independently rather than in networks with other traffickers, although some domestic gang influences have been documented.

Recruitment

Traffickers frequently recruit victims by posing as a romantic partner or exploiting an existing intimate relationship. Traffickers often recognize specific vulnerabilities and modify their recruitment efforts to exploit those factors by initially offering economic and emotional support.

Victim Profile

According to Polaris-operated hotline data, survivors are overwhelmingly U.S. citizen women and girls. Additionally, 48 percent of LGBTQ youth surveyed in "Surviving the Streets of New York" reported finding customers for commercial sex on the street². Women and girls of color are also disproportionately represented in the data. While victims represent diverse experiences and socioeconomic backgrounds, a review of the data found that certain inequalities and societal factors may make particular individuals especially vulnerable. These factors include histories of trauma and abuse, addiction, chronic mental health issues, and economic hardship such as homelessness or unstable housing. Runaway and homeless youth are particularly vulnerable.

Methods of Control

Hotline data has shown that traffickers more frequently use physical violence in outdoor solicitation than in other types of sex trafficking, but also exploit their intimate relationship, isolating them from support networks, and inducing or exploiting substance abuse issues. Verbal abuse and other types of manipulation are also common. Traffickers often confiscate a victim's entire earnings, set unrealistic nightly quotas, and deny food and shelter as punishment if the quota is not met.

² Meredith Dank et al., *Surviving the Streets of New York: Experiences of LGBTQ Youth, YMSM, and YMSW Engaged in Survival Sex* (Washington: Urban Institute, 2015); www.urban.org/sites/default/files/alfresco/publication-pdfs/2000119-Surviving-the-Streets-of-New-York.pdf

³ www.nationalhomeless.org/factsheets/lgbtq.html

⁴ cahomelesseyouth.library.ca.gov/docs/pdf/StrugglingToSurvive-Final.pdf

LGBTQ Survivors

While sex trafficking affects all demographics, people who lack strong support networks, have fewer economic opportunities, have experienced violence, or who are generally marginalized are particularly vulnerable. LGBTQ homeless youth are 74 times more likely to experience acts of sexual violence than their non-LGBTQ peers³. According to Polaris-operated hotline data, traffickers often exploit an LGBTQ person's housing insecurity and need for family, threaten to "out" them to loved ones, manipulate their self-worth, cause distrust of others, and withhold hormone therapy or other gender-expression necessities in order to control them.

Most often Polaris-operated hotlines obtain information about LGBTQ identity directly from survivors. These survivors often need more urgent assistance such as crisis intervention and direct services, which may take priority over collecting more detailed information about the nuances of their human trafficking experience. Consequently, while some sex trafficking types reveal unique intersections with the LGBTQ community, it's believed they are more than likely underrepresented in this typology. It is difficult for many individuals who have been trafficked to reach out for assistance, but this is especially true for individuals who fear that they will be mistreated or not believed because of their gender identity or sexual orientation. Additionally, when faced with fewer resources, employment opportunities, or social supports, LGBTQ homeless youth are three to seven times more likely to enter the street economy and engage in survival sex to meet basic needs, such as shelter, food, drugs, and toiletries⁴. These individuals may not reach out for assistance because they don't see themselves as victims but are simply doing what they need to in order to survive. For more information on sex trafficking and the LGBTQ community and Polaris's recommendations to strengthen the safety net for this population, please see our other relevant reports.

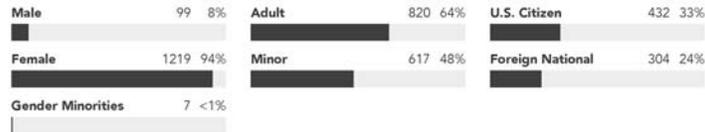
04

Residential



Description and Business Model

Sex trafficking can occur within organized residential brothels run by a network of coordinated traffickers or within private households used more informally for commercial sex. Residential brothels that follow the first, more formalized model tend to cater to commercial sex buyers from similar ethnic and/or language backgrounds, advertising through word of mouth or covert business cards. Advertisement for the second model varies but often includes word of mouth, and Backpage.com is emerging as a frequent source.



Trafficker Profiles

In the first model, traffickers may be part of larger, organized networks, and in some cases may have formal or informal ties to organized crime groups such as gangs or cartels. In the second model, residential brothels may be private homes where inter-familial or intimate partner trafficking is taking place.

Recruitment

The first model tends to involve victims recruited through fake romantic interests, false job offers, or fraudulent immigration promises. In the second model, hotline data indicates that family members and intimate partners usually begin exploiting victims within homes opportunistically due to extreme economic hardship.

Victim Profile

In more formalized brothels, victims tend to be women and to a lesser extent girls, with many victims from Latin America, particularly Mexico, and from Southeast Asia, particularly China. Sex trafficking within residences informally used as brothels typically involves child victims, with boys making up a growing percentage.

Methods of Control

In the first model, networked traffickers often employ physical violence, lethal threats to victims and their families, debt bondage, and extreme confinement and monitoring. As noted, the second model tends to involve a higher percentage of minor victims than other types of sex trafficking. Although force, fraud, and coercion may not be necessary, common methods can include confinement, inducing illicit substances, threats to harm or expose, and exploiting the familial or intimate relationship.

Sex trafficking within residences informally used as brothels typically involves child victims, with boys making up a growing percentage.

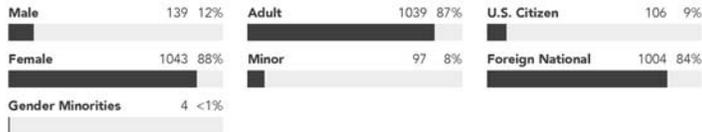


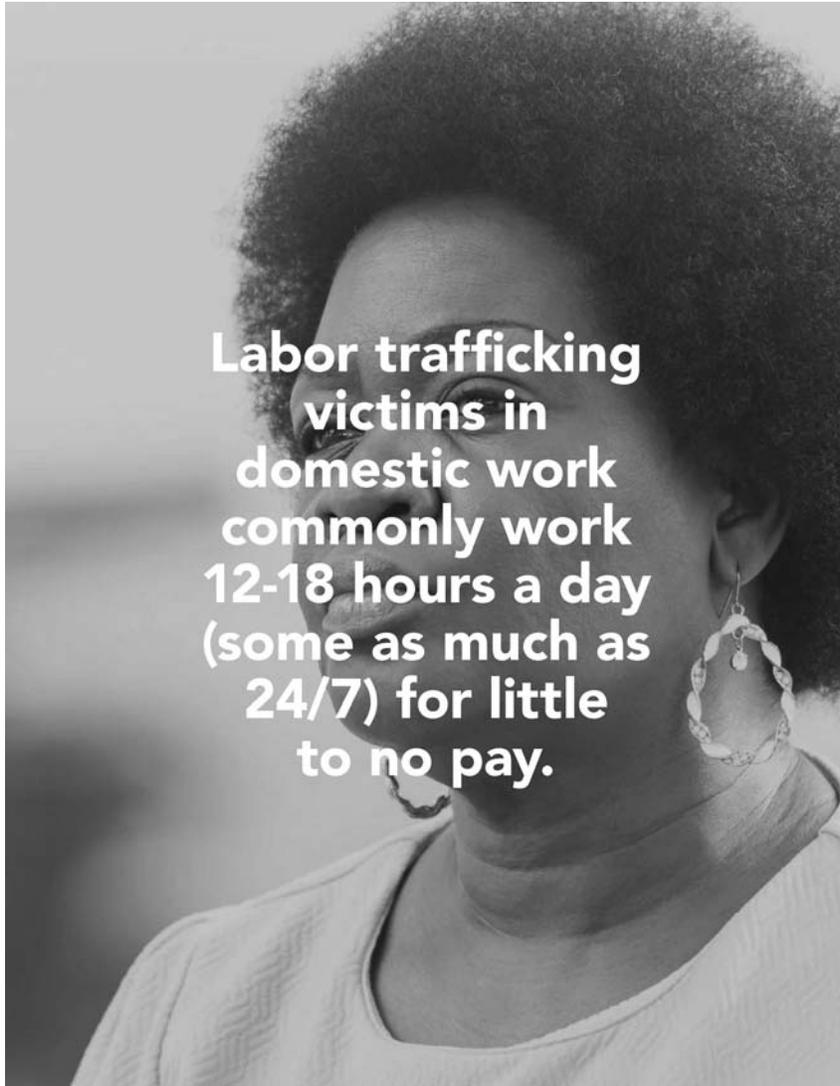
05 Domestic Work



Description and Business Model

Domestic or homecare workers often live within their employers' households and provide services such as cooking, cleaning, and caretaking for children and the elderly or infirm. Labor trafficking for domestic work may also occur within the cycle of intimate partner violence or forced marriage situations as a means of maintaining or exerting power and control.





**Labor trafficking
victims in
domestic work
commonly work
12-18 hours a day
(some as much as
24/7) for little
to no pay.**

Trafficker Profile

Traffickers in this type have diverse profiles. Many are wealthy individuals, sometimes from the victim's home country. Domestic workers with A-3 and G-5 visas are especially vulnerable to the imbalanced power dynamic inherent in temporary work visas due to the trafficker's elevated status as a diplomat, royal, or high-ranking member of an influential international organization. This status makes the fear of speaking out even greater and can allow traffickers to continue exploiting victims under the protection of diplomatic immunity. Family members and intimate partners may also be traffickers, though less commonly.

Recruitment

In cases reported to Polaris-operated hotlines, most survivors enter their situation on a B-1, A-3, or G-5 temporary work visa. Fraud with J-1 Au Pair visas and, increasingly, with B-2 (tourist) visas also occurs. Additionally, U.S. citizens and foreign national women on K-1 (fiancé) visas may experience labor trafficking for domestic work.

Victim Profile

Hotline data reflects that survivors are predominantly middle-aged to older-aged women from the Philippines, while many are U.S. citizens or survivors from Latin America, India, and numerous countries spanning Sub-Saharan Africa. Survivors in this data came from more than 105 countries. Male victims were reported in 12 percent of the cases and child victims in 8 percent.

Methods of Control

Labor trafficking victims in domestic work commonly work 12-18 hours a day (some as much as 24/7) for little to no pay. They may experience extreme isolation and confinement from the outside world, sexual harassment, high levels of monitoring, debt bondage, extreme wage theft, confiscation of critical documents such as passports, and restricted access to food and medical care. Traffickers often intentionally allow the victim's visa to expire and use the newly undocumented status to create fear and distrust, which leads to even greater submission. Because of this, labor trafficking of domestic workers can often last for years or even decades.

5 U.S. Citizenship and Immigration Services. (2016). H-2A Temporary Agricultural Workers. Retrieved from: www.uscis.gov/working-united-states/temporary-workers/h-2a-temporary-agricultural-workers

Temporary Work Visas

Visa Category	Visa Description	Visa Portability
A-3 and G-5	Domestic worker for foreign diplomats, royalty, or staff of international organizations	No
B-1	Temporary business/ domestic worker	Yes
H-1B	Specialty occupations	No
H-2A	Agricultural worker	No
H-2B	Non-agricultural worker	No
J-1	Cultural exchange	Yes*

* In most cases, sponsors must approve a change of employer.

Misuse or exploitation of temporary work visas occurs in most labor trafficking types. The U.S. government makes visas available for foreign workers to temporarily work in the United States to perform critical jobs in a wide variety of industries when employers have found U.S. citizens are unable, unwilling, or unqualified to perform them⁵. Most visas referenced in this report tie workers to a single employer, making the system ripe for exploitation. Workers without visa portability who want to leave even the most abusive jobs lose their legal status to work in the United States and are at risk of deportation proceedings. This can significantly limit their ability to re-enter the U.S. in the future. For many temporary workers, this is an impossible choice, as leaving these jobs may cause the long-term economic ruin of the worker and his or her family. Exploitative employers will take advantage of this lack of visa portability by using it as a constant threat to intimidate, maintain control, or remind victims of this unbalanced power dynamic. To learn more about temporary work visas and our recommendations to protect these workers, see Polaris's report *Labor Trafficking in the U.S.: A Closer Look at Temporary Work Visas*.

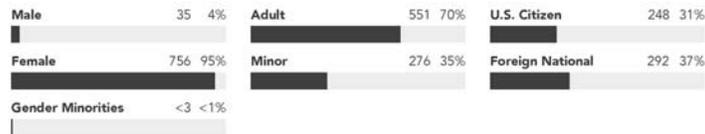
06

Bars, Strip Clubs, & Cantinas



Description and Business Model

Human trafficking in this type fronts as legitimate bars, restaurants, or clubs selling food and alcohol while exploiting victims for both sex and labor behind the scenes. Victims are forced to provide customers of the cantina with flirtatious companionship to entice them to purchase high-priced alcoholic beverages that often come with an explicit or implicit agreement for commercial sex acts as well. Polaris has identified several distinct business models within this industry. These include bars and cantinas that are entirely run by organized human trafficking networks. However, at other locations traffickers have agreements with the business owners that allow them to operate prostitution rings out of the bar or cantina in exchange for a portion of the criminal profits. In addition to the cantina-like businesses, many strip clubs and go-go clubs are associated with this type of sex and labor trafficking.



Trafficker Profile

In some of the cantinas, organized human trafficking networks run the operations. Male and female traffickers based in Mexico or Central America operate or cooperate with criminal networks to sustain complicated, multi-year supply lines of new victims and to ensure that victims comply. U.S. citizens may also be traffickers in this network. In some cases, traffickers directly cooperate with, or are members of, cartels or U.S.-based street gangs. Traffickers may also be intimate partners or family members of their victims. Owners of the cantinas or bars may be directly involved in the trafficking and exploitation, or they may not be aware of this activity. Traffickers who use strip clubs are typically less networked than the cantina-like businesses and can often be intimate partners of the victims. Some links with Eastern European organized crime have emerged and merit more research.

Recruitment

Victims are deceived and enticed with promises of better job opportunities, romantic relationships, and safe migration to the U.S.

Victim Profile

Bars and cantinas frequently victimize women and girls from Mexico and Central America aged 14 to 29, and the clientele is normally limited to men from local Latino communities. Most trafficking in go-go clubs and strip clubs involves U.S. citizen women and girls, as well as some from Eastern Europe. Male victims have also been reported.

Methods of Control

A significant degree of violence is often reported in these cases, with women and girls severely beaten into submission, sexually assaulted, and threatened with weapons and death to their families if they do not comply. They frequently are trapped due to insurmountable debts to their traffickers. In addition, victims can be exploited for labor when they are forced to waitress, sometimes for excessive hours with no breaks or pay.

Sex Trafficking from Mexico and Central America

Thousands of women and girls from Mexico, Central America, and U.S. Latino communities are prisoners of a violent underground sex economy in the United States. Criminal networks or independent traffickers target vulnerable women and girls, often struggling with poverty, an abusive past, or a lack of opportunity, and exploit them for profit. These victims are deceived and enticed with false promises of love, good jobs, or safe passage to the United States, and are forced to engage in commercial sex. Often without legal status, money, or English fluency, they become trapped – controlled by their traffickers through brutal threats and other forms of abuse.

Traffickers who exploit these women and girls use a variety of business models and network structures. Traffickers may pose as intimate partners, employers, or recruiters, or claim that they can help with safe migration. Traffickers may be operating alone, as part of loose and informal networks, or as part of larger, organized criminal activity. Residential brothels, cantinas and bars, and escort services are the types of sex trafficking most commonly associated with these victim populations.

Polaris's Strategic Initiative to end Sex Trafficking from Mexico (STFM) focuses on analyzing and dismantling these networks while bolstering the cross-border safety net for survivors.

07 Pornography



Description and Business Model

The National Hotline has documented cases of family members, intimate partners, and individual sex traffickers earning profit from distributing a victim's non-consenting appearance in pornographic material. The related issue of "revenge porn" is also a concern within relationship violence and can be considered high risk for sex trafficking. For cases involving webcams, please refer to Remote Interactive Sexual Acts. This type also includes the production and distribution of child pornography. The National Hotline frequently receives tips via our online reporting tool linking to suspicious websites that may contain child pornography. While the hotline records data from these reports, the hotline is unable to investigate such links to verify the legitimacy and therefore forwards all potential child pornography tips to The National Center of Missing and Exploited Children. Please visit the center for more information.



Trafficker Profile

Due to limited data, little is known about typical trafficker profiles, except that in many cases traffickers may be intimate partners or family members of their victims. Traffickers within formal pornography production companies have also been recorded in Polaris-operated hotline cases, but data is thin.

Recruitment

Due to limited data, little is known, except that traffickers may exploit existing romantic or familial relationships.

Victim Profile

While some tips of sex trafficking in pornography supply limited data due to the caller's distance from the situation, in hotline cases where enough information was provided to establish high indicators of sex trafficking, data has revealed that survivors tend to be U.S. citizens. While most survivors in these cases are female, the rate of male victimization is four times the rate in other sex trafficking types.

Methods of Control

An existing intimate partner may use manipulation, "gaslighting," threats of harm, and substance abuse to coerce or defraud adult victims into pornography and subsequently sell the explicit content to websites or individual buyers. In some cases, traffickers may force a victim to engage in commercial sex, film the sex act, and then sell or threaten to sell the content. Due to limited data, little is known about methods of control in cases that may involve more formal pornography businesses.

The rate of male victimization is four times the rate in other sex trafficking types.



08

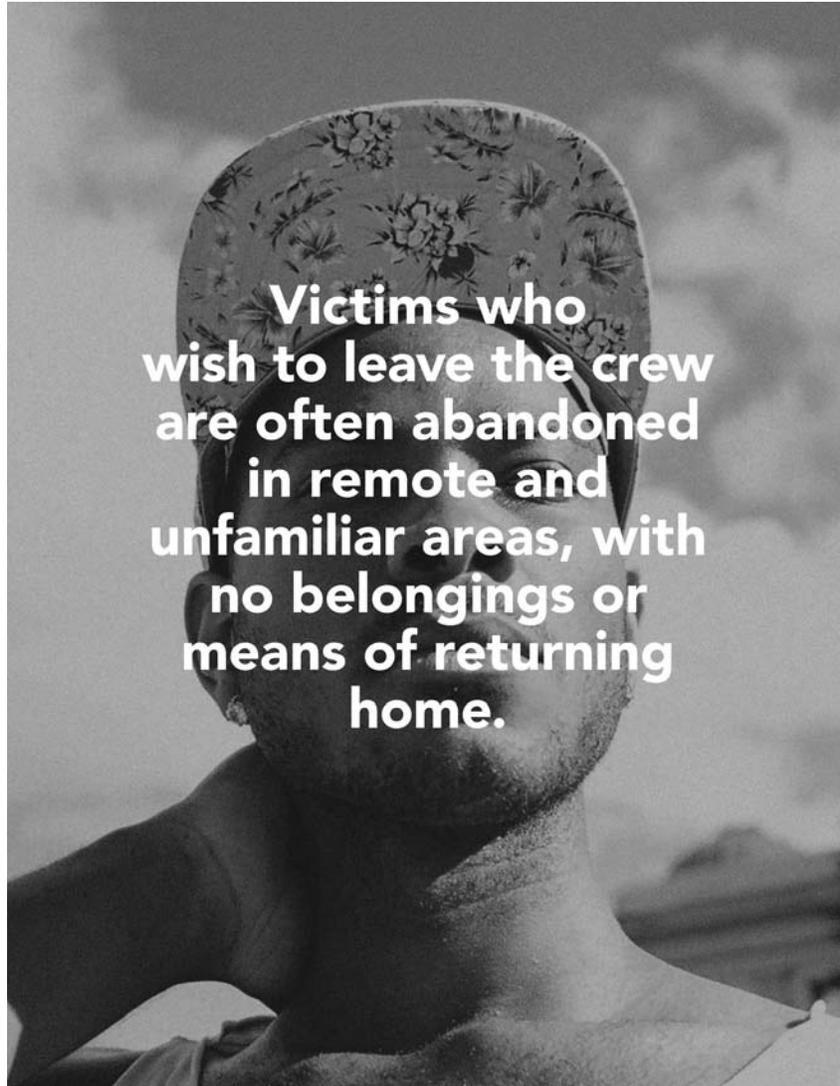
Traveling Sales Crews



Description and Business Model

Traveling sales crews move between cities and states and go door-to-door, often selling fraudulent products such as magazine subscriptions that customers may never receive. Young salespeople are rarely fully compensated, they sell from morning until night, and are unable to leave due to fraud, manipulation, and coercion. As a result, sales crews find this business model of labor trafficking financially rewarding and low-risk. Data shows numerous linkages between sales crews and a larger national business network. It can be challenging to find these links because many organizations, particularly those with a long record of fraud-related complaints, frequently change their names and operating locations while remaining under the same ownership.





Victims who wish to leave the crew are often abandoned in remote and unfamiliar areas, with no belongings or means of returning home.

Trafficker Profile

Traffickers may be crew managers or business owners. These crews and businesses are highly networked, with numerous connections among different business owners.

Recruitment

Recruitment occurs through social media, online classifieds, posters at schools, and person-to-person contact (most common). Fraud is rampant in the hiring process, and crew members routinely note that working conditions and sales commissions are significantly misrepresented in advertisements or during recruitment.

**The victims in
Traveling Sales
Crews are
overwhelmingly
U.S. citizens.**

Victim Profile

Traffickers in traveling sales crews will specifically target teens and young adults from marginalized and economically disadvantaged communities. Although most crews claim to hire those who are at least 18, minors as young as 15 can be involved. Unlike other types of labor trafficking, the victims in this category are overwhelmingly U.S. citizens.

Methods of Control

Managers control nearly all aspects of the lives of crew members and drivers while they are on the road, and isolate them from wider society by imposing long work hours, moving frequently between regions, employing intense peer pressure and public shaming of workers, and controlling after-hours activity. Managers may deny crew members food, confiscate their driver's licenses, or threaten them if they do not meet their daily sales quotas. Victims are typically paid a stipend of \$5 to \$20, the rest allegedly covering "debts" for lodging and transportation. Victims who wish to leave the crew are often abandoned in remote and unfamiliar areas, with no belongings or means of returning home as an "example" to other crew members to keep them from complaining or seeking help. In nearly a quarter of cases reported to the Polaris-operated hotlines, callers indicated that managers or fellow crew members physically assaulted salespeople who wished to leave. Sexual assault was reported in numerous cases.



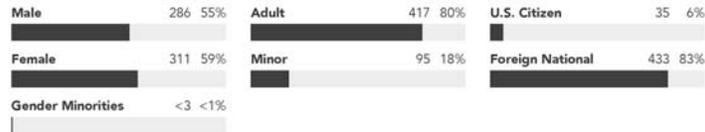
09

Restaurants & Food Service



Description and Business Model

Labor trafficking within the restaurant and food industry has been documented in nearly all kinds of food service and may involve bars, clubs, buffets, taquerias, or food and ice cream trucks. People working as cooks, bus staff, and wait staff may be exploited, with traffickers often taking advantage of language barriers between exploited workers and patrons—and in some cases other workers at the same restaurant who are not being abused—to help avoid detection.



Trafficker Profile

With this type it can be difficult for even survivors to decipher who their primary trafficker is since the links between the smugglers, recruiters, and restaurant management are sometimes unclear and may be deliberately obfuscated by the trafficker to help avoid detection. Information suggests that in some cases a single actor is primarily responsible, while in other cases multiple actors with different roles may be working in collaboration to exploit the workers.

Recruitment

In many cases, victims are recruited using false promises and charged extremely high fees by smugglers to ensure safety while migrating to the U.S. and a better-paying job, only to end up trapped in a restaurant and trafficked for their labor.

Victim Profile

Data has indicated that foreign national men and women from East and Southeast Asia, Mexico, and Central America tend to be equally victimized. However, victims from almost every region of the world have been trafficked in the U.S. While a significant majority of victims are adults, nearly 20 percent of cases of potential labor trafficking in restaurants reported to the Polaris-hotlines involved minors. Of the individual victims identified in hotline cases, nearly a third were undocumented immigrants. Hotline data also shows many cases of labor trafficking in restaurants involving the same primary victim populations, but on J-1 and H-2B work visas.

Methods of Control

Victims can be confined at the restaurant around the clock or be isolated in a nearby home provided by the traffickers. Situations become more exploitative when the employer controls employee housing where victims are charged well-above-market rates for crowded, substandard living conditions, food, and transportation, which can increase their debt and further prevent them from leaving. Victims who do attempt to leave or report abuse may face lethal threats to their families back home or be threatened with deportation. Victims on H-2B and J-1 visas face similar immigration and "blacklisting" threats due to the lack of visa portability and are subjected to poor housing conditions, wage theft, excessive hours, and discrimination.

Victims can be confined at the restaurant around the clock or be isolated in a nearby home provided by the traffickers.



10 Peddling & Begging



Description and Business Model

Forced peddling and begging is a well-known type of labor trafficking globally, but Polaris-operated hotlines tend to receive fewer direct reports from victims of this type in the U.S. due to a limited number of victims willing to speak out. One peddling scheme revealed by hotline data involves traffickers who pose under the guise of a seemingly legitimate charitable or religious organization claiming to provide trips and enrichment services to “at-risk youth.” In fact, these rings exploit young U.S. children by forcing them to sell candy or baked goods, or solicit “donations” on streets or in shopping centers.



Trafficker Profile

Due to limited data, little is known. Some case data has shown familial links with traffickers forcing their more vulnerable family members into begging.

Recruitment

Due to limited data, little is known.

Victim Profile

These victim demographics lead to the potential for increased vulnerabilities and populations ranging from foreign national men, women, and children with an unstable immigration status (such as an undocumented immigrant whose trafficker is the temporary U.S. sponsor) to foreign and U.S. citizens who have physical or intellectual disabilities and/or behavioral health concerns.

Methods of Control

Although data is limited around elements of force, fraud, and coercion, information suggests that traffickers monitor and intimidate victims from a distance, compel excessive working hours, take most of the earnings, instill daily quotas, and deny victims access to education, food, or transportation.

Some case data has shown familial links with traffickers forcing their more vulnerable family members into begging.



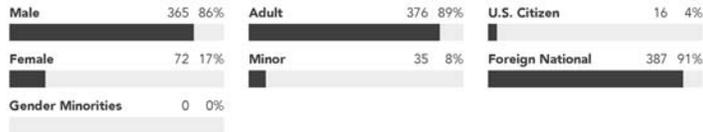
11

Agriculture & Animal Husbandry



Description and Business Model

Traffickers exploit workers in the agriculture and animal husbandry industry, from corn fields to orange orchards to dairy farms. Some crops such as tobacco require much more intensive labor to harvest, making them more susceptible to forced labor or exploitation. Tobacco is the crop cited most often on Polaris-operated hotlines, accounting for 10 percent of all agricultural labor trafficking cases. Others frequently mentioned are cattle/dairy, oranges, tomatoes, and strawberries. Often an agricultural contract will promise an hourly rate but then pay on a piece-rate basis, which severely limits earning potential and further entraps the victims. Abuse and exploitation of agricultural workers can happen at multiple levels due to the complex labor supply chain of recruiters, managers, contractors, subcontractors, growers, and buyers.





Traffickers have been known to subject victims to squalid living conditions, often denying them even basic necessities such as beds and indoor toilets.

Trafficker Profile

Workers can find it difficult to determine exactly who is responsible for the origin of the exploitation, due to this complex supply chain. In some cases, there may be a single or main trafficker who has one of these roles, while in other cases exploitation may involve multiple actors.

Recruitment

Recruitment usually features a more formal approach than in other industries, with recruiters charging victims recruitment and travel fees that create insurmountable debt, even though these costs are the responsibility of the employer under U.S. visa regulations⁶ for H-2A holders. Less is known about recruitment of undocumented workers or holders of other visa types, though anecdotal hotline cases suggest that recruiters and recruitment fees may be present in some cases.

Victim Profile

According to cases reported to Polaris-operated hotlines, survivors of this type of labor trafficking are disproportionately Latino male migrant workers, mostly from Mexico and Central America, on seasonal H-2A visas. South African men on H-2A visas rank a distant second. Latinas and unaccompanied foreign minors are also victimized. However, this data appears to differ from the findings of farmworker advocacy groups, which have reported serving mostly workers on other visa types and undocumented victims.

Methods of Control

If a victim leaves an abusive work situation, they may lose their status, and some traffickers exploit this lack of visa portability to instill fears about deportation or immigration status. Traffickers in agriculture also isolate victims in rural parts of the country with little to no means of accessing community support. Despite the H-2A program requirement that employers supply workers with suitable housing⁷, traffickers have also been known to subject victims to squalid living conditions, often denying them even basic necessities such as beds and indoor toilets. Victims are also frequently denied the protective gear to do their jobs safely. This is most evident in tobacco fields, where despite the risk of contracting green tobacco sickness (GTS)⁸, tobacco workers on Polaris-operated hotlines frequently reported that their employers did not provide them with equipment that is necessary when directly handling tobacco leaves and pesticides. Oftentimes medical care is deliberately delayed or not offered for even the most severe workplace injuries or illnesses. By far the most common method of control in agriculture, as in many other types, is economic abuse, including wage theft, improper deductions, and payment at piece rates rather than hourly rates.

⁶ Labor Certification Process for Temporary Agricultural Employment in the United States (H-2A Workers). (2010). Retrieved from: www.acfr.gov/cgi-bin/text-idx?SID=D1928c2b081515d27508dd0c18321f8&node=pt20.3.655&rgn=div5#p20.3.655.b

⁷ Department of Labor, Wage and Hour Division (WHD). (2015). H-2A: Temporary Agricultural Employment of Foreign Workers. Retrieved from: www.dol.gov/whd/eg/eg_h-2a.htm.

⁸ Center for Disease Control and Prevention. (2015). Green Tobacco Sickness. Retrieved from: www.cdc.gov/niosh/topics/greentobaccosickness/



12

Personal Sexual Servitude

405
Cases

Description and Business Model

With cases of personal sexual servitude, the lines between trafficker, recruiter, and buyer are blurred and largely depend on how the victim views each perpetrator. Personal sexual servitude takes various forms, and the payment is not always cash. In addition, the line between ongoing sexual abuse and personal sexual servitude is complex, and different survivors may define their experiences differently. Personal sexual servitude can occur when a woman or girl is permanently sold, often by her family to settle a drug debt, to an individual buyer for the explicit purpose of engaging in periodic sex acts over a long period of time. It can also occur within a commercial non-consenting marriage situation, primarily involving adult foreign national women and their families or U.S. spouses. In some of these forced marriages, the survivors can possess K-1 (fiancé) visas. Some victims are forced to do domestic work. Runaway homeless youth and LGBTQ minors without a third-party facilitator may also be victims of personal sexual servitude when they are coerced to engage in sex on an ongoing basis in order to receive basic needs such as shelter, food, and medications.

Male	62	15%	Adult	299	74%	U.S. Citizen	158	39%
Female	351	87%	Minor	123	30%	Foreign National	147	36%
Gender Minorities	4	<1%						

Trafficker Profile

Trafficker profiles vary widely and may include members of organized crime syndicates, smugglers, intimate partners, family members, and landlords.

Recruitment

As noted, this form is heterogeneous, and recruitment varies. In some cases, victims may be "sold" by a family member to a trafficker. In other cases, recruitment involves the exploiter posing as a benefactor for the victim or misrepresenting the living arrangement or relationship. Additional cases include exploitation by intimate partners.

Victim Profile

Victim profiles vary significantly. In most cases reported to Polaris-operated hotlines, victims are U.S. citizens. Runaway homeless youth and LGBTQ minors are particularly vulnerable. Adults facing economic hardship and unstable housing are also at risk. Foreign national victims are predominantly women and girls from Mexico and Central America, though victims from Southeast Asia have also been reported.

Methods of Control

Exploiters use ongoing sexual assaults, physical abuse, confinement and isolation, threats, substance abuse, and/or withholding food, shelter, or drugs as forms of abuse or punishment.

In some cases, victims may be "sold" by a family member to a trafficker. In other cases, recruitment involves the exploiter posing as a benefactor for the victim or misrepresenting the living arrangement or relationship.

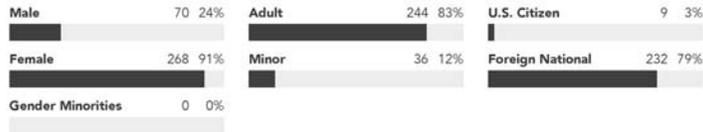


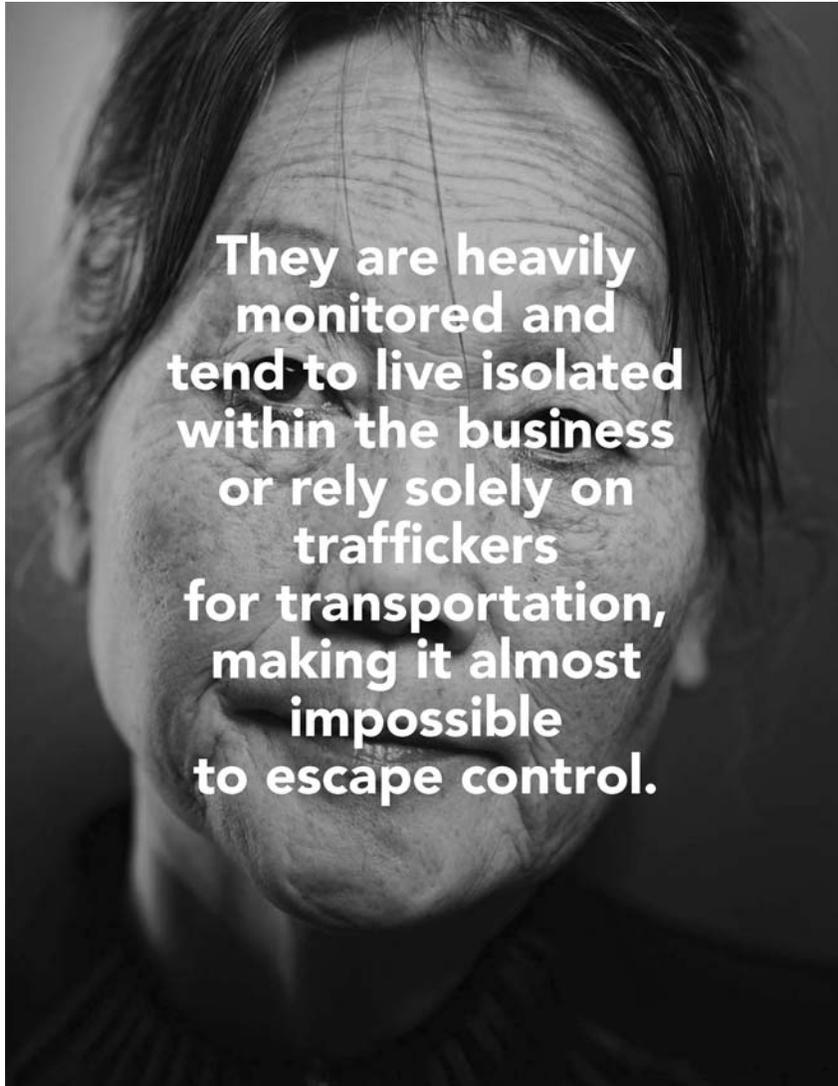
13 Health & Beauty Services



Description and Business Model

Labor trafficking and exploitation has been known to occur in businesses such as nail salons, hair salons, and health spas. Though workers interact regularly with customers, providing services such as manicures and facials, due to language barriers and intensive monitoring, it can be difficult for workers to reach out for help.





Trafficker Profile

Due to limited data, little is known, but traffickers predominantly have an employer relationship with victims, and many are from Vietnam or China. In a smaller subset of cases, the trafficker was a victim's intimate partner or spouse.

Recruitment

Little is known due to limited data, though preliminary information from hotline cases suggests that recruitment can involve high levels of fraud and deceit such as misrepresenting wages, working conditions, and immigration and educational benefits. This recruitment fraud is also a form of control.

Victim Profile

Hotline data indicates that most survivors are from Vietnam or China, with a smaller portion possibly being naturalized U.S. citizens. It's worth noting, however, that many of these hotline cases are reported by community members who may not have direct knowledge of victim or trafficker demographics. For example, external research has shown a substantial subset of South Korean workers within the industry, and they are not prominently reflected in hotline data. Polaris data indicates that most victims are adult women, while men are victims in nearly 25 percent of cases. Minor victims have been referenced in fewer than five percent of cases.

Methods of Control

Victims are often not aware of the possible "intern" periods, when they work extensive hours for no wage and are lucky if they get to keep tips in cash. Exposure to harsh chemicals without proper masks and gloves is another concern, as is frequent movement between salons to further hinder victims from establishing support or accessing help. Victims never remain in the same city for a stable period of time, and they are heavily monitored and tend to live isolated within the business or rely solely on traffickers for transportation, making it almost impossible to escape control. Additionally, many victims remain in their abusive situation hoping for promised immigration and educational benefits that never materialize.

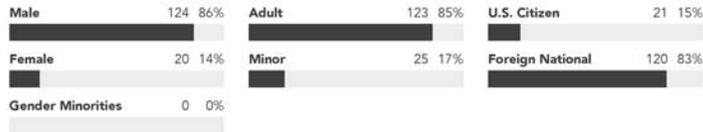


14 Construction



Description and Business Model

Victims of labor trafficking may be forced to work in the construction industry, usually within small contracting businesses completing tasks such as roofing, carpentry, welding, electrical work, and masonry on both large commercial construction sites as well as in private homes. Employers may misclassify workers as independent contractors, thus limiting their access to worker protections and benefits.



Trafficker Profile

Because of the complicated nature of the labor supply chain and the roles of direct employers, recruiters, contractors, and smugglers, in many cases victims are unable to identify who is responsible for their exploitation. Some traffickers deliberately obfuscate the labor supply chain to avoid detection.

Recruitment

Workers can enter their exploitative situations through formal job offers and misrepresented visa contracts. In some cases, workers may be charged illegal and exorbitant recruitment fees, which may be a method of control to keep workers in abusive situations. Recruitment may also begin through an abusive migration journey or through word-of-mouth referrals.

Victim Profile

The majority of labor trafficking survivors in construction are men from Mexico and the Northern Triangle (El Salvador, Honduras, and Guatemala), most of whom have H-2B visas or are undocumented. U.S. citizen survivors have also been forced to perform construction jobs under the control of fraudulent religious organizations, unscrupulous residential and drug recovery programs, and individuals posing as landlords exploiting a victim's homelessness.

Methods of Control

Victim wages are drastically deducted, and many experience withholding of all payment as a means of control by their traffickers. Hotline data also shows that victims are kept in their trafficking situation through threats of deportation and threats to blacklist the worker from future U.S. jobs if he leaves or reports his situation. Survivors have also reported experiencing verbal abuse, harassment, and denial of necessities such as water and safety equipment.

Employers may misclassify workers as independent contractors, thus limiting their access to worker protections and benefits.

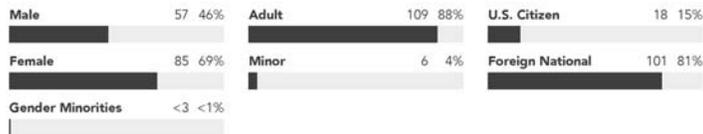


15 Hotels & Hospitality



Description and Business Model

Victims of labor trafficking have been found in hospitality businesses such as hotels, motels, resorts, or casinos working as front desk attendants, bell staff, and, most frequently, in housekeeping.





**Most are women
and men from Jamaica,
the Philippines, and
India, and typically
they are told that they
will make lucrative
wages to support
family back home.**

Trafficker Profile

Traffickers may be in hotel management or with a labor recruiter/labor broker that subcontracts with the hotel to provide labor. If the trafficker is a contractor, the hotel may not be aware of the abuse.

Recruitment

Most commonly, workers were recruited with job offers that misrepresented the working conditions, wages, and the ability to safely leave the job. In other cases, workers were recruited via other fraudulent promises.

Victim Profile

Most are women and men from Jamaica, the Philippines, and India, and typically they are told that they will make lucrative wages to support family back home. Most victims enter the job with an H-2B visa, which restricts visa portability, tying victims to their abusive employer. J-1 visas are also used, though less frequently. U.S. citizen victims have also been reported to the hotline. Adults made up the vast majority of victims reported to Polaris-operated hotlines.

Methods of Control

Debt bondage and other forms of economic abuse, such as withholding or confiscating payment, were the most common types of control reported in hotline cases. Other problems included confinement to the hotel property and constant monitoring, altered or fake contracts, physical abuse, and sexual harassment. Due to the lack of visa portability, threats of deportation and police involvement often keep workers from seeking help.



16

Landscaping

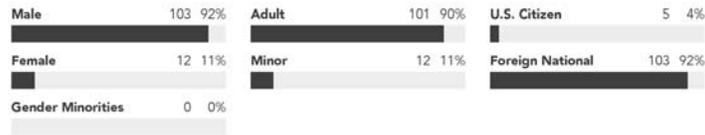
112
Human Trafficking
Cases

664
Labor Exploitation
Cases

Description and Business Model

Victims of labor trafficking in landscaping are responsible for maintaining public or private grounds, gardens, and nurseries. Landscaping is the most commonly referenced type of labor trafficking and exploitation involving H-2B visa holders in cases reported to Polaris-operated hotlines. H-2B visa holders are not eligible for federally funded legal services, making it extremely difficult to secure services for victims in landscaping.





Trafficker Profile

Supervisors and owners of landscaping companies and subcontractors are often the exploiters, though due to limited hotline data, little is known about trafficker demographics.

Recruitment

Most victims were recruited through job offers that turned out to be fraudulent or through other false promises or misrepresented work contracts. Some recruiters may also be responsible for the abuse and trafficking, though in cases reported to Polaris-operated hotlines, this was significantly less common than fraud by employers.

Victim Profile

Sixty-three percent of hotline cases involved men from Mexico. Some of the workers were from Guatemala or were U.S. citizens. Cases involving women and children are rare, according to Polaris-operated hotlines.

Methods of Control

Exploitation in landscaping sheds light on what is most problematic about the H-2B system, which allows employers and recruiters to exploit victims with little regard for standard worker protection laws. Workers may be forced to pay rent to their employers at rates much higher than market, despite sometimes not getting paid for their work. Threats to blacklist victims to prevent them from attaining employment in the U.S. in the future are not uncommon due to the lack of visa portability. Additionally, in many cases reported to the hotlines, victims' wages were confiscated or withheld to keep them from leaving. Victims also experienced various threats to themselves and/or their families if they sought help.

Workers may be forced to pay rent to their employers at rates much higher than market, despite sometimes not getting paid for their work.

17

Illicit Activities



Description and Business Model

Criminal syndicates in illegal industries can exploit people for profit with the same levels of force, fraud, and coercion as in any legitimate labor industry. Polaris has seen this type of trafficking most frequently with street-level drug distribution businesses and cross-border drug smuggling, along with general domestic gang activity. Based on hotline data, traffickers have also exploited victims in the hazardous business of illicit drug production and in the isolated marijuana cultivation industry in Northern California and the Pacific Northwest, though limited data is available. Labor trafficking within illicit activities can occur in tandem with sex trafficking business models, as evidenced by the additional 76 cases reported to Polaris-operated hotlines that involved both sex trafficking and labor trafficking for illicit activity. The accompanying sex trafficking usually occurs when a drug distributor not only forces an intimate partner to sell drugs but to trade sex in exchange for a supply. These activities often intersect with a sub-type of residential sex trafficking that occurs in private residences used informally as commercial drug distribution homes.

Male	68	61%	Adult	82	74%	U.S. Citizen	24	22%
Female	47	42%	Minor	30	27%	Foreign National	62	56%
Gender Minorities	<3	<1%						

Trafficker Profile

According to hotline data, traffickers in this type include victims' intimate partners, fellow members of domestic street gangs, independent drug dealers and producers, and highly coordinated Latino cartels.

Recruitment

Drug distributors often recruit their intimate partners to sell drugs. Domestic gangs tend to target vulnerable boys and young men who are looking for protection and a surrogate "family unit" and convince them to act as look-outs and commit burglary and sometimes more violent crimes for profit. Latino cartels and other criminal entities are known to abduct people or fraudulently promise their victims protection in their migration to the United States only to force them to carry drugs across the border.

Victim Profile

Adult and minor female intimate partners of drug dealers, both U.S. citizen and foreign national, are routinely forced to sell drugs. In addition, domestic gangs target young U.S. citizen boys. Finally, men and vulnerable, unaccompanied boys from Mexico and Central America are chronically trafficked in cartel-controlled drug smuggling schemes.

Methods of Control

Traffickers use extreme threats of violence against the victim and family members, intimidation in the form of gang/cartel connections, manipulation, and intense monitoring to coerce and control victims. Physical violence, often involving weapons, is also very likely in drug distribution and smuggling.

Latino cartels and other criminal entities are known to abduct people or fraudulently promise their victims protection in their migration to the United States only to force them to carry drugs across the border.

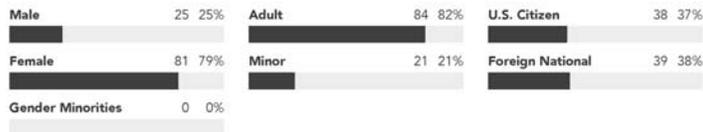


18 Arts & Entertainment



Description and Business Model

Cases of labor trafficking have been reported to Polaris-operated hotlines in a variety of sectors of the arts and entertainment industry, including modeling, athletics and, less commonly, in performing arts such as acting, choirs, and dance troupes. The hotlines also have received reports of labor trafficking in exotic dancing. While the lines between sex and labor trafficking in strip clubs is often complex, if the adult victim is forced into exotic dancing with no accompanying sex act, this would be classified as labor trafficking.





In the modeling industry, foreign and U.S. citizen women can be fraudulently recruited through social media and online classifieds with exaggerated job offers and fake immigration benefits.

Trafficker Profile

Traffickers include recruiters and executives in model management companies ranging from small independent agencies to large corporate entities, as well as individual "coaches" in athletics. Strip club and exotic dancing club owners are often culpable actors in trafficking, though a significant number of cases reported to the hotlines involve a victim being trafficked in a strip club by an intimate partner not affiliated with the club.

Recruitment

In the modeling industry, foreign and U.S. citizen women can be fraudulently recruited through social media and online classifieds with exaggerated job offers and fake immigration benefits. Young boys in athletics are recruited through an individual "coach" who convinces their families to pay outlandish recruitment fees with promises of a flourishing sports career and better educational opportunities. Recruitment in strip clubs can begin with a legitimate job offer or fake romantic pursuits.

Victim Profile

Young women (both U.S. and foreign nationals) are often victimized in the modeling industry. Although more data is needed on typical visas used by traffickers, fraud involving H-1B and B-2 tourist visas have been documented. Labor trafficking in athletics often involves boys and young men from Latin America and West Africa, and U.S. citizen women are the majority trafficked for labor in strip clubs.

Methods of Control

Victims in the modeling industry may be sexually abused and harassed, not paid, or charged exorbitant fees for crowded housing. When victims involved in athletics arrive in the U.S., they are enrolled in competitive school teams or traveling leagues and sometimes forced to practice and exercise from morning to night, causing exhaustion. Food and hygiene are limited, and victims never see any of the prize money from competitions. The most common types of control used to coerce victims in strip clubs are economic abuse (primarily wage confiscation and sometimes high fees) and emotional abuse and psychological manipulation, which can be particularly coercive when the trafficker is an intimate partner of the victim.

Young boys in athletics are recruited through an individual "coach" who convinces their families to pay outlandish recruitment fees.



19 Commercial Cleaning Services

93
Human Trafficking
Cases

344
Labor Exploitation
Cases

Description and Business Model

The National Hotline has encountered trafficking and labor exploitation within commercial cleaning businesses that provide janitorial and housekeeping services to multiple private households, office buildings, and other commercial businesses.

We have not included additional data in Types #19-25 due to an insufficient number of cases.



Trafficker Profile

Trafficker networks are largely unknown, but some data has shown traffickers can be either business owners or family members of survivors.

Recruitment

Fraudulent job offers or other false promises are the most common methods of recruitment, according to limited hotline data. Family pressure and manipulation can also be present.

Victim Profile

Though limited data is available, there is sufficient evidence that foreign national men, women, and unaccompanied children from Latin America are most susceptible to labor trafficking within these businesses. Others are from the Philippines and the Caribbean or are U.S. citizens.

Methods of Control

Common methods of exploitation include withholding or confiscating wages, verbal abuse, exhausting hours, and exposure to hazardous cleaning chemicals without proper protective equipment. The situation may become trafficking when victims are told they must work off a debt, their passports are withheld, or they're coerced with threats of homelessness or deportation if they refuse to continue working.

Foreign national men, women, and unaccompanied children from Latin America are most susceptible to labor trafficking within these businesses.

20

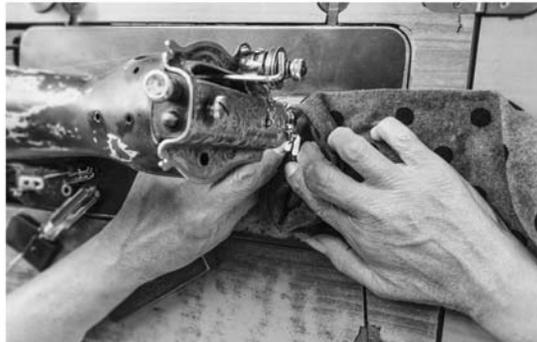
Factories & Manufacturing

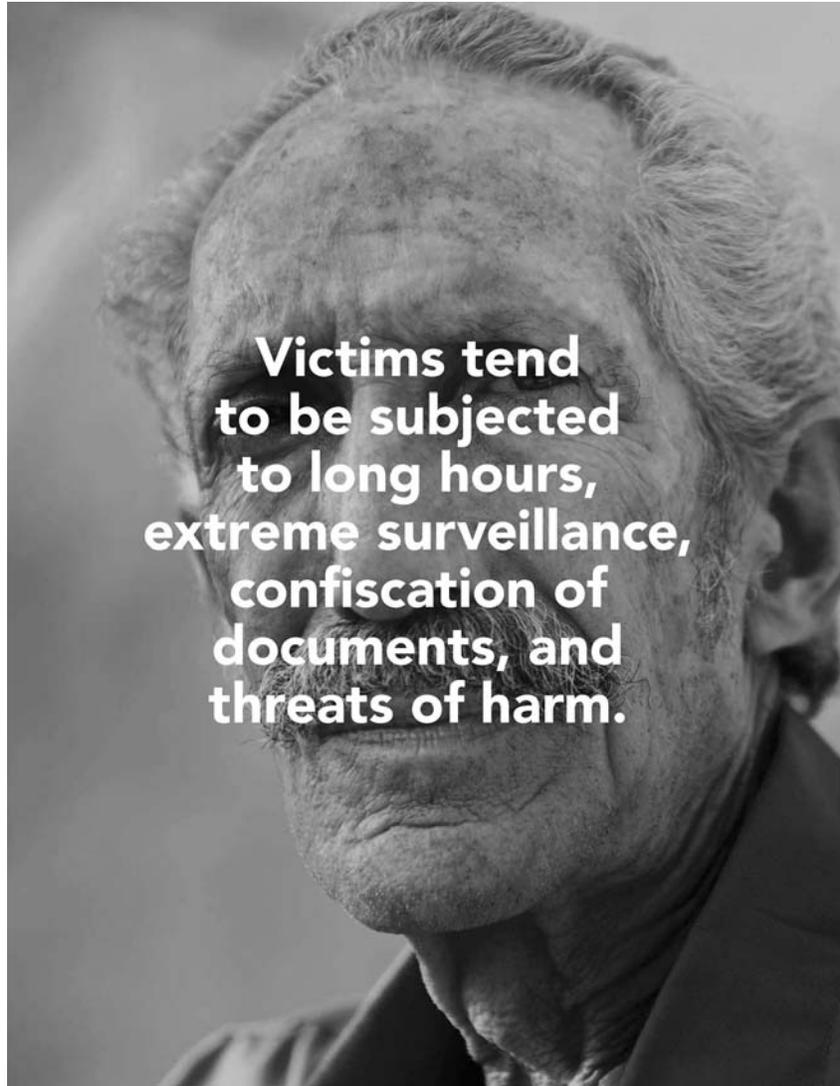
78
Human Trafficking
Cases

200
Labor Exploitation
Cases

Description and Business Model

Workers in food processing, clothing, and shoe manufacturing factories are especially vulnerable to labor abuse and trafficking. Polaris-operated hotlines have also documented labor trafficking and exploitation cases in a wide range of other manufacturing facilities, including factories producing electronic devices and vehicles.





Trafficker Profile

More information on trafficker demographics is needed, but as with most labor trafficking types, direct supervisors and middle managers tend to facilitate abuse. The National Hotline has also documented family connections between traffickers and survivors.

Recruitment

While data is limited, preliminary hotline data suggests that fraudulent job offers are common. Some victims have reported being recruited by family members.

Victim Profile

H-2B visa holders are often victims, but minors also have been referenced in National Hotline cases. Nationalities are much more diverse than in most other labor trafficking types, but the highest concentrations are from Southeast Asia, Latin America, and India.

Methods of Control

Victims tend to be subjected to long hours, extreme surveillance, confiscation of documents, and threats of harm. Victims have reported being denied bathroom breaks to increase assembly line productivity and being locked inside the factory. In addition to being a form of coercion used to control victims, this confinement is a significant safety concern. According to hotline data, workers also frequently experience verbal abuse and degradation as a means of control, as well as economic abuse such as the withholding of wages or creation of debts to keep workers in abusive situations. Victims may also experience threats to blacklist them from future employment opportunities or to report them to immigration authorities.

Victims may also experience threats to blacklist them from future employment opportunities or to report them to immigration authorities.

21

Remote Interactive Sexual Acts

78
Cases

Description and Business Model

Remote interactive sexual acts are live commercial sex acts simulated through remote contact between the buyer and victim through technologies such as webcams, text-based chats, and phone sex lines. Because of the lack of physical contact between the victim and buyer, traffickers can frame this business during victim recruitment as a “low-risk” endeavor. However, as with all commercial sex, this business model becomes sex trafficking if the victims are compelled to participate under force, fraud, or coercion, or if the victim is under the age of 18.

Trafficker Profile

Little is known about trafficker profiles and network structure for this type of sex trafficking, although limited hotline data suggests that a trafficker's relationship to the victim can range from a significant other to someone a victim considers nothing more than an exploiter.

Recruitment

Recruitment tends to involve posing as a benefactor, promising lucrative earnings, professional modeling opportunities, or false romantic interests. Hotline data also include cases where webcam websites and phone lines are used as recruitment grounds for sex traffickers.

Victim Profile

In the limited number of cases reported to Polaris-operated hotlines, U.S. citizen females are the most frequent victims; minors are victimized in just under half of all cases. The same data has also revealed a surprising 12 percent of cases involve the LGBTQ community, most commonly in regard to the identity of the victim(s). Causes for such a high incidence of LGBTQ victims merit more research because that rate is much higher than the common 2 to 5 percent of LGBTQ cases in other types of human trafficking.

Methods of Control

In some cases victims have reported manipulation, threats of violence, isolation, and/or debt to traffickers or recruiters, though due to limited data, little is known about exact details.

U.S. citizen females are the most frequent victims; minors are victimized in just under half of all cases.



22

Carnivals

52
Human Trafficking
Cases

79
Labor Exploitation
Cases

Description and Business Model

Labor exploitation and human trafficking cases involving carnival workers have been reported to the National Hotline. Workers are responsible for operating rides, games, and food stands, as well as for assembling and disassembling carnival equipment for movement between cities. Carnival companies may contract with state and county fairs to provide rides and games, and a small number of companies and recruiters dominate the U.S. carnival industry.

Trafficker Profile

Formal labor recruiters and carnival owners and supervisors tend to be responsible for abuse and exploitation. Data indicates that these are typically U.S. citizen men.

Recruitment

Formal H-2B labor agents dominate the recruitment, falsely promising safe and fair working conditions throughout the season. Instead, some victims have attested that they were made to pay illegal recruitment fees for the job, visa, and/or transportation and had to sleep in crowded, dilapidated trailers.

Sometimes workers are told that their wages are being held for them until the end of their contracts, so if they try to leave abusive situations before then, they will have no money.

Victim Profile

Most cases involve men and women from Mexico or South Africa on H-2B visas. While some U.S. citizens have been documented to work at carnivals, the extent of their potential exploitation is relatively unknown.

Methods of Control

Victims have been known to stay awake around the clock to set up, operate, and dismantle equipment before traveling to the next city to repeat the exhausting process. This lack of sleep can cause serious workplace accidents due to extreme fatigue, for which victims are typically denied medical services. Isolation from any supportive services is also common due to the travel and lack of adequate legal protections for H-2B workers. Workers have also reported threats of blacklisting or deportation and document confiscation to keep them from leaving or reporting abuse. Workers may also experience wage theft, exorbitant fees for housing, and fraudulent payment deductions. Sometimes workers are told that their wages are being held for them until the end of their contracts, so if they try to leave abusive situations before then, they will have no money.



23

Forestry & Logging

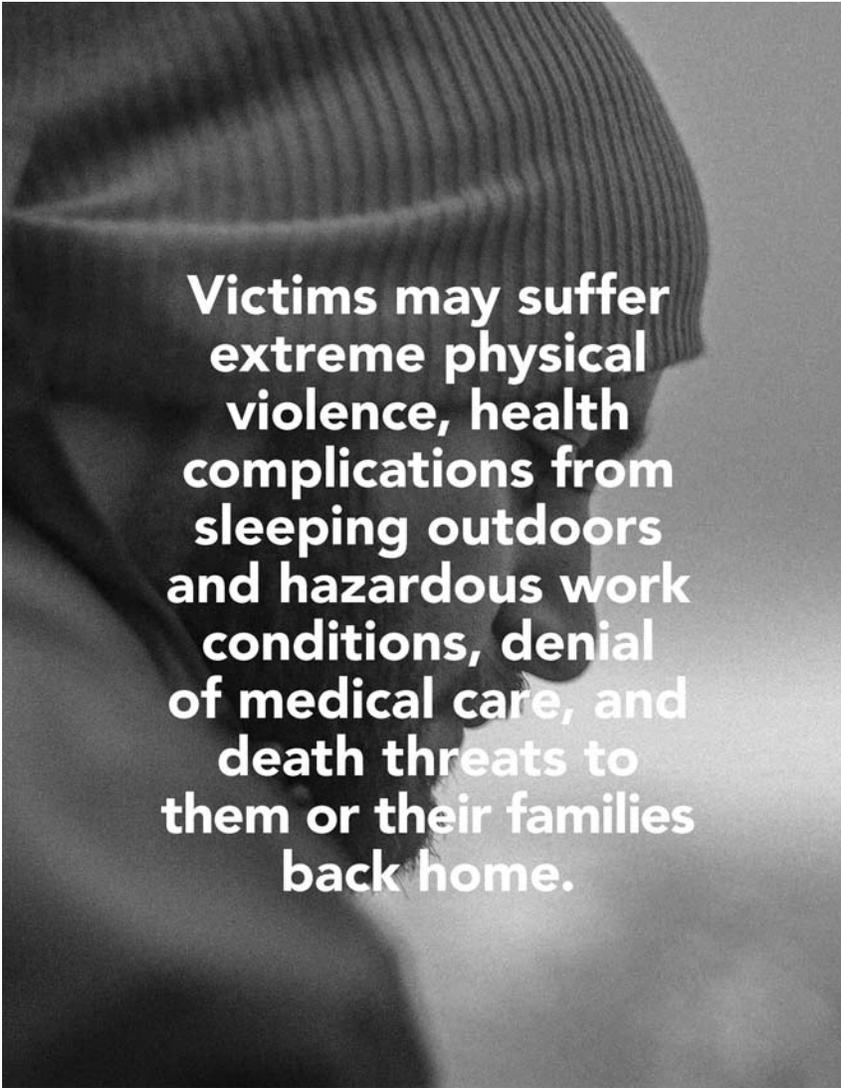
50
Human Trafficking
Cases

163
Labor Exploitation
Cases

Description and Business Model

According to data from Polaris-operated hotlines, trafficking in the forestry industry has included pine tree farm workers, reforestation planters, loggers, and workers maintaining woodland areas.





Victims may suffer extreme physical violence, health complications from sleeping outdoors and hazardous work conditions, denial of medical care, and death threats to them or their families back home.

Trafficker Profile

Traffickers are typically management or crew leaders within the forestry business, although as in other complicated labor supply chains, victims sometimes have a difficult time understanding who is responsible for their exploitation.

Recruitment

Unfair recruitment practices are not uncommon and, as in other H-2B recruitment schemes, can include the victim being charged exorbitant and illegal fees.

Victim Profile

Survivors in forestry are almost exclusively men from Mexico and Guatemala on H-2B visas, according to cases reported to the National Hotline.

Methods of Control

Case data shows that victims are not paid by the hour as required by law, but are paid per acre or tree they plant, drastically decreasing earning potential. Traffickers may withhold or confiscate payment to keep workers from leaving. In some hotline cases, workers experienced debt bondage as another form of economic control. Document confiscation by traffickers is also frequently reported, along with threats to blacklist workers from future jobs or threats to have workers deported. Even though H-2B workers in forestry are entitled to government-funded legal services, victims are often kept in isolation and are unaware what city or state they are in, making it difficult or impossible to access help or report abuse. All the while, victims may suffer extreme physical violence, health complications from sleeping outdoors and hazardous work conditions, denial of medical care, and death threats to them or their families back home.

Survivors in forestry are almost exclusively men from Mexico and Guatemala on H-2B visas, according to cases reported to the National Hotline.

24

Health Care

46
Human Trafficking
Cases

59
Labor Exploitation
Cases

Description and Business Model

Labor trafficking victims in the healthcare industry are primarily found in nursing homes and as home health aides, according to hotline data. The lines between domestic work and in-home health care can be difficult to ascertain, since some domestic caregivers are expected to provide medical services without proper certification. Because of the intersections with home healthcare and domestic work, it is important to consider both industries when crafting intervention and disruption efforts.



Trafficker Profile

With this type it can be difficult for even survivors to decipher who their primary trafficker is due to the complicated relationships among recruiters, staffing agencies, and employers. In some cases, the trafficker may obfuscate these relationships to avoid detection. The trafficker may even be part of the victim's family.

Recruitment

The most frequent recruitment tactics are not known due to limited data, though preliminary hotline data suggests that misrepresented job offers and other false promises are used, and that in some cases the trafficker may use a family relationship with the victim as a recruitment strategy.

Victim Profile

Migrant women from the Philippines are most prevalent in hotline data, followed by West African immigrant women and U.S. citizens. Victims may possess H-1B, H-2B, J-1, or H-1C (registered nurse) visas. Male survivors are involved in 23 percent of labor trafficking within the healthcare industry, according to Polaris-operated hotline cases.

Methods of Control

As in domestic work, the overlapping methods of control include extreme isolation, monitoring, verbal degradation, threats of deportation or blacklisting, and document confiscation. High levels of fraud and misrepresentation of job conditions were also reported among victims on the hotlines. Economic abuse is the most frequent method of coercion and includes nonpayment or underpayment of wages, debt bondage, and limiting access to a victim's own funds or bank accounts.

Migrant women from the Philippines are most prevalent in hotline data, followed by West African immigrant women and U.S. citizens.

25

Recreational Facilities

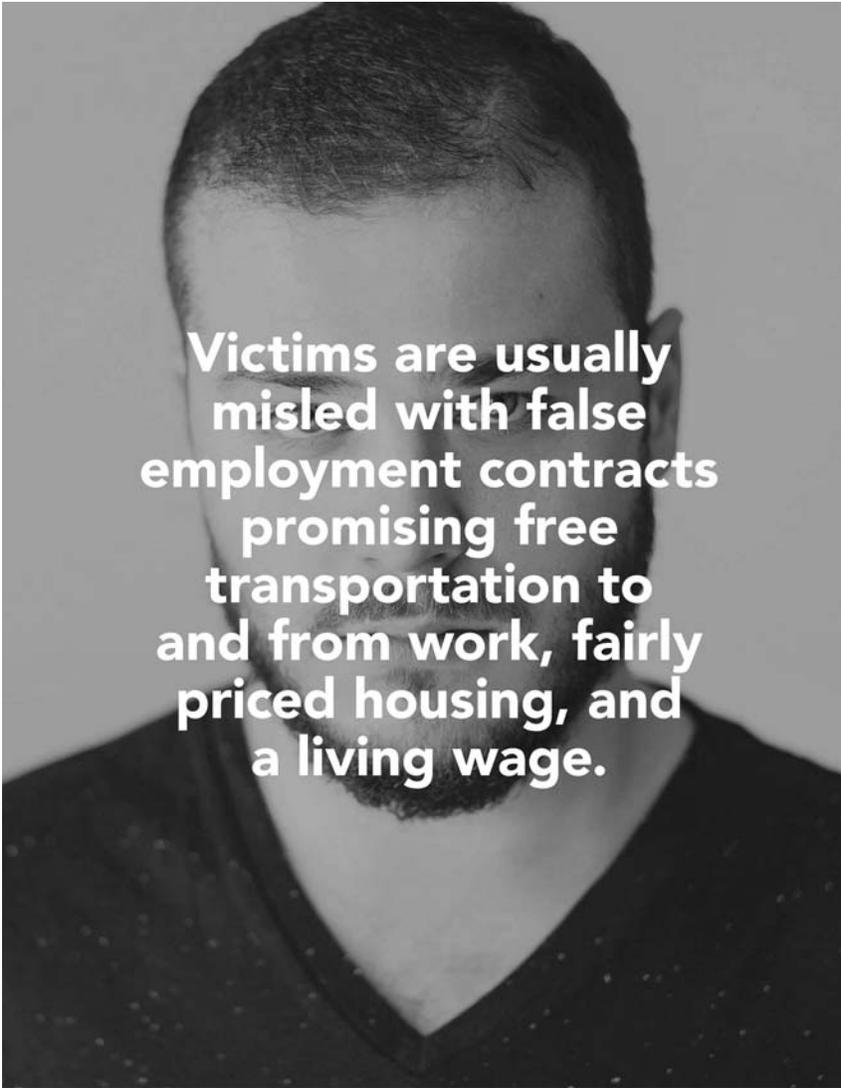
37
Human Trafficking
Cases

220
Labor Exploitation
Cases

Description and Business Model

Labor trafficking for work in recreational facilities has been reported to the National Hotline in amusement parks, summer camps, golf courses, and community swimming pools, though it may also occur in other sectors of this industry. Positions at these facilities include lifeguards, camp counselors, ride attendants, and food vendors.





Victims are usually misled with false employment contracts promising free transportation to and from work, fairly priced housing, and a living wage.

Trafficker Profile

Limited data provides evidence that traffickers are typically part of the facility's management. However, some cases have involved complicit visa sponsors and recruiters.

Recruitment

Victims are usually misled with false employment contracts promising free transportation to and from work, fairly priced housing, and a living wage.

Victim Profile

While victims of labor exploitation tend to be young adults on J-1 visas as part of the work and travel program, nationalities run the gamut from countries across Eastern Europe, Latin America, the Caribbean, East and Southeast Asia, the Middle East, and even the U.S. (about one-third of trafficking cases), according to hotline data.

Methods of Control

Economic abuse, such as withholding wages, was the most common method used to control workers, along with intense monitoring and threats to deport or blacklist workers. Verbal abuse and document confiscation are also not uncommon methods used to keep workers in abusive situations. Although the J-1 is one of the only work visas that allows portability, the process for switching employers can be cumbersome and confusing for victims seeking to leave abusive employers.

Types Yet To Be Defined**1671 TRAFFICKING CASES**

Through data collected from Polaris-operated hotlines we have also documented 10 other types of human trafficking. These may become distinct types in the future as we accrue more data.

Trafficking is occurring in legal brothels and in non-spa or bar-like commercial businesses. Labor trafficking is also known to have occurred in retail, mining, education, professional, and scientific specialty occupations and the fishing industry. Cases involving various types of forced labor and sexual exploitation have also been documented among fraudulent religious organizations, which have been reported to employ manipulation and coercion. Additionally, certain instances of sanctioned prison labor may meet the definition of forced labor and human trafficking, depending on the circumstances. While hotline data on these industries is lacking, it is possible that such data could emerge in the future with increased awareness and outreach. Polaris's research team welcomes insight from the community on additional types of trafficking that should be highlighted or explored.

Next Steps

The Typology of Modern Slavery in the U.S. lays the groundwork for igniting a new type of discussion on how to efficiently and effectively disrupt and eliminate human trafficking networks by type on a national scale.

It allows stakeholders to begin to look more precisely at each category in order to take steps to prevent and eliminate distinct forms of exploitation. Providing youth with education about human trafficking in school, for example, can help minors identify when they or their peers are at risk of recruitment.

This report should also encourage distinct stakeholders to connect across disciplines to develop action plans that address policies and practices that fuel human trafficking across types. This kind of collaboration will enable diverse experts and community actors to take collective action on the most significant factors driving human trafficking. For example, federal reform and oversight of non-immigrant work visas to better protect foreign national temporary workers would help loosen the grip of control and coercion that many traffickers leverage across multiple human trafficking types.

This report and the discussion it inspires should help the field make smarter investments that can have both deeper and wider effect on public health and safety.

We encourage stakeholders to identify ways their unique expertise can leverage this material in order to combat human trafficking, and we look forward to actively participating in the development of strategies to address all 25 types in the months and years to come.

This report should also encourage distinct stakeholders to connect across disciplines to develop action plans that address policies and practices that fuel human trafficking across types.

Acknowledgements

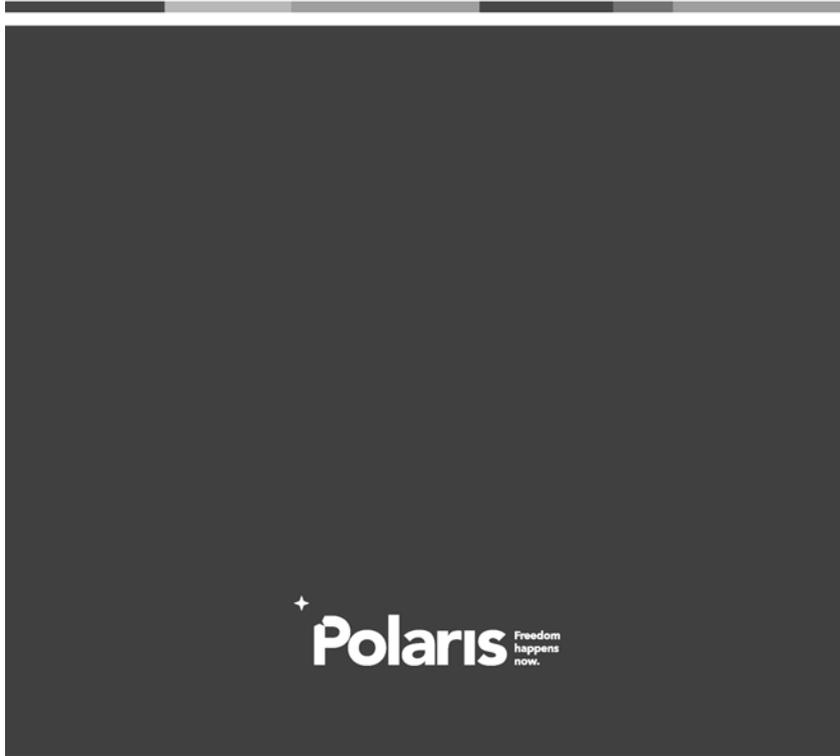
This report was researched and written by Brittany Anthony, data researcher for Polaris's data analysis program; Jennifer Kimball Penrose, director of Polaris's data analysis program; and Sarah Jakiel, chief program officer of Polaris. Other Polaris staff, including Tessa Couture, Sara Crowe, Megan Fowler, Rochelle Keyhan, Keeli Sorensen, Bradley Myles, and Mary Ann Badavi contributed to the text.

Additionally, we are grateful to the Carlson Family Foundation, Google, and other donors for their generous financial support. Most importantly, we would like to extend our gratitude to community members and survivors of trafficking who have found the courage to share their experiences with the National Human Trafficking Hotline and Polaris's BeFree Textline, without whose testimony this report would not exist.



KNOCKING AT YOUR DOOR

LABOR TRAFFICKING ON TRAVELING SALES CREWS



 **Polaris** Freedom
happens
now.

ABOUT POLARIS

Polaris is a leader in the global fight to eradicate modern slavery. Named after the North Star that guided slaves to freedom in the U.S., Polaris acts as a catalyst to systemically disrupt the human trafficking networks that rob human beings of their lives and their freedom. By working with government leaders, the world's leading technology corporations, and local partners, Polaris equips communities to identify, report, and prevent human trafficking. Our comprehensive model puts victims at the center of what we do—helping survivors restore their freedom, preventing more victims, and leveraging data and technology to pursue traffickers wherever they operate.



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TO GET HELP, REPORT A TIP, OR REQUEST INFORMATION OR TRAINING, CALL THE NATIONAL HUMAN TRAFFICKING RESOURCE CENTER AT 1-888-373-7888 OR SEND A TEXT TO BEFREE (233733).

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EXECUTIVE SUMMARY

Labor trafficking is a form of modern slavery in which individuals are compelled to perform labor or services against their will by means of force, fraud, or coercion. The National Human Trafficking Resource Center (NHTRC) hotline and the Polaris BeFree Textline received 419 reports of likely labor trafficking cases involving traveling sales crews between January 2008 and February 2015, more than any other industry except domestic work. This report analyzes data collected from these hotlines, as well as open source data from legal records, government documents, industry experts, news media, and social media.

Sales crews travel frequently across state lines, most commonly selling magazines. Employment by a traveling sales crew becomes trafficking when the employer uses force, fraud, or coercion to maintain control over the salesperson, causing that worker to believe that he or she has no choice but to stay and continue to work. Instead of the promised commission on sales, crew members typically receive a daily stipend of \$10 to \$20 to cover personal costs and meals. Earnings beyond this stipend may quickly disappear to cover “debts” to the crew for housing and transportation. Crew managers may manipulate, threaten, or abuse their employees to pressure them into working harder or to intimidate those who wish to leave their situation. If a crew member insists on leaving, the manager may abandon him or her in an unfamiliar location – often without money or belongings.

The traveling sales business already has a poor reputation due to customer complaints and civil lawsuits attesting to the presence of consumer fraud in many sales crews’ operations. Yet the direct salespeople, often treated as complicit in this fraud, are in many cases victims of a dangerous and highly abusive industry.

MAJOR FINDINGS

Recruitment is a crucial aspect of operations for traveling sales crews due to the high rate of turnover among crew members. Traffickers in sales crews make a high profit with little risk to themselves by targeting low-income, young people within the United States. Person-to-person recruitment, newspaper ads, fliers posted on college campuses, or online

job postings promising fun, travel, and high earnings are all methods crews use to attract new members. While advertisements may specify that new crew members must be at least 18, reports indicate operators do little to verify ages. Thirty-four percent of cases reported to the NHTRC and BeFree Textline involve potential minors. Thirty-nine reported cases feature workers brought into the U.S. through the J-1 visa program, who risk deportation if they leave an abusive crew.

Force, fraud, or coercion is often used in the traveling sales industry to prevent sales crew members from leaving their jobs. Fraud is rampant in the hiring process, and crew members routinely note that working conditions and sales commissions are significantly misrepresented in advertisements or during recruitment. Managers control nearly all aspects of the lives of crew members and drivers while they are on the road, and isolate them from wider society by imposing long work hours, moving frequently between regions, employing “cult-like” peer pressure, and controlling after-hours activity. Managers may deny crew members food, confiscate their driver’s licenses, or threaten them if they do not meet their sales quotas. Abandonment is a key threat from operators, with 25 percent of reports to the NHTRC and BeFree involving workers left behind in unfamiliar areas without means to return home. In nearly 24 percent of cases reported to the NHTRC and BeFree, callers indicated that managers or fellow crew members physically assaulted salespeople who wished to leave. Sexual assault was also reported in dozens of cases.



The relationships between sales crews indicate numerous linkages within the business network. It can be challenging to find these links because many organizations, particularly those with a long record of fraud-related complaints, frequently change their names and operating locations while remaining under the same ownership. Even when operating under a new name, their receipts and advertising material may still be labeled with previous business names. Over the past 24 years, some larger networks have at least nominally broken up, only to be replaced by smaller, more flexible crews. Yet NHTRC and BeFree data - and other sources - continue to show significant connections between the newer and older businesses based upon the identities of business owners and crew managers, as well as on linked business records.

Despite long-standing recognition of the abuses rife within the traveling sales industry, numerous attempts to address abuse have failed. Whether classified as independent contractors or outside sales workers, traveling sales crew members are exempt from most of the federal labor protections afforded to direct employees. One of the few notable successes in regulating traveling sales crews occurred at the state level in Wisconsin. "Malinda's Law," passed in 2009, is named after one of the victims of a van accident which killed seven teenage members of a magazine sales crew near Janesville, WI in 1999.

RECOMMENDATIONS

There are a number of steps that could reduce labor trafficking and severe exploitation among sales crews and increase support for trafficking victims within this industry. Please see the full list of recommendations on pp. 23-26.

Federal Government entities should:

- Amend the Fair Labor Standards Act (FLSA) in order to cover door-to-door sales workers.
- Ensure adequate funding for services designed to assist victims of human trafficking, including victims of labor trafficking on sales crews.
- Hold sales crew employers responsible for providing the required Form 1099-MISC to document expenditures (Internal Revenue Service).
- Investigate abuses of the J-1 visa program (Department of State).

State Governments should adopt stronger laws to regulate employment conditions on traveling sales crews, potentially modeling them after Wisconsin's successful regulation. They should consider defining a private right of action for individuals who have experienced trafficking situations, employment misclassification, wage violations, or other abuses on traveling sales crews, and highlight the dangers of traveling sales as an occupation.

Law enforcement agents must look for signs of trafficking when stopping crew members for traffic violations or for door-to-door solicitation and pursue action against those at the top of the network rather than on crew members. They can also initiate fraud cases against known abusive businesses.

Service organizations should recognize that sales crew members can be victims of labor trafficking requiring services like other human trafficking victims do, and be prepared to address survivors' immediate needs for short-term shelter and transportation home. They must also be aware that some survivors, both male and female, have had extremely traumatic experiences of psychological control, physical abuse, and sexual assault.

The publishing industry should make efforts to ensure a transparent business supply chain in their magazine sales in order to protect their brand reputations. Since it is unlikely that publishers have the resources to oversee sales agents, however, they should additionally be prepared to cooperate with government entities in the case of investigations of bad actors within the door-to-door sales industry.

The hotel and transportation industry should train staff to recognize the indicators of traveling sales crew victims, and share available resources like the National Human Trafficking Resource Center hotline, the National Runaway Safeline, and more. Both industries should also partner with service providers to provide hotel or transportation vouchers to victims.

Consumers should be cautious when buying magazines or other items from sales crews that are not clearly affiliated with a local organization such as a school, and be alert to suspicious job advertisements. They can also give the NHTRC or BeFree hotline numbers to sales crew members who display signs of being at risk for trafficking. Consumers should not attempt to follow the crew member or intervene directly.



FORMER CREW MEMBERS SPEAK OUT

“ At the time I felt like I didn’t have a choice.
They do a good job of convincing you that you
have to keep up your sales and stay with the crew.”

- from Polaris interview with S. Hunt



INTRODUCTION AND METHODOLOGY

Since Polaris began operating the National Human Trafficking Resource Center (NHTRC) hotline in December 2007, and the BeFree Textline in March 2013, these hotlines have received more reports of labor trafficking on traveling sales crews within the United States than in any other industry except domestic work. Employment by a traveling sales crew becomes trafficking when the employer uses force, fraud, or coercion to maintain control over the salesperson, causing that salesperson to believe that he or she has no choice but to stay and continue to work.

Traveling sales workers are particularly vulnerable to these abuses because they are exempt from most federal and state minimum wage requirements, overtime limitations, and other employment protections. State-level regulation is hampered by the fact that traveling sales crews move frequently from state to state.

Polaris recognizes that legitimate door-to-door sales businesses operate throughout the United States, but due to the lack of labor protections and other vulnerabilities, many traveling sales crews operations are at high risk for labor trafficking.¹ The NHTRC and the BeFree Textline received 419 reports of likely labor trafficking cases involving traveling sales crews between January 2008 and February 2015. The Better Business Bureau files over one thousand complaints about the traveling sales industry each year, including complaints about abusive labor practices engaged in by these businesses. Hundreds more complaints are available on forums such as ComplaintsBoard.com and RipOffReport.com, and on Facebook, where former crew members have testified to having been subjected to force, fraud, or coercion while working on traveling sales crews.² The National Consumers League, the National Runaway Safeline, Georgia Office of Consumer Protection, Parent Watch, and other organizations have similarly identified traveling sales as an industry rife with worker abuse.

Sources and Methodology

This report analyzes data collected from the NHTRC hotline and the Polaris BeFree Textline, as well as data from open

source research. Open sources consulted include legal records, government documents, industry experts, news media, and social media. These sources were of varying credibility individually; accordingly, information included in this report is limited to that which could be confirmed by multiple sources, including NHTRC and BeFree data. With this information, this report aims to identify emerging trends, major challenges, promising practices, and areas of need in the response to labor trafficking in traveling sales crews across the United States.

Confidentiality

Individuals accessing the NHTRC hotline and BeFree Textline may choose to provide as much or as little detail as they wish. There are no requirements to provide identifying details and many individuals opt to remain anonymous. Contact with the hotline is confidential and this report excludes all identifying information. All statistics are reported in aggregate with the utmost care taken to protect the privacy and safety of the individuals who access our services, of our law enforcement and service provider partners, and of our staff. Additional data used to supplement this report was from open sources including business records, legal records, the Better Business Bureau, consumer complaint forums, news media, and social media. All quotes from survivors were made available to the general public by survivors.

LABOR TRAFFICKING IN SALES CREWS

Labor trafficking is a form of modern slavery in which traffickers use violence, threats, manipulation, debt bondage, and other forms of force, fraud, or coercion to force people to work against their will.³ Labor trafficking has been found in numerous industries in the United States, including the agriculture, hospitality, restaurant, homecare professionals, and traveling sales industries. Between January 2008 and February 2015, the National Human Trafficking Resource Center (NHTRC) and the Polaris BeFree Textline received reports of 419 instances of potential labor trafficking in sales crews.⁴

While in many labor trafficking situations the majority of victims are foreign nationals, traffickers who run traveling sales crews target economically disadvantaged young people within the United States. Traveling sales businesses almost exclusively recruit unemployed or under-employed young adults, promising a fun job, travel, and high profits. Instead, recruits frequently find themselves in situations at high risk for labor trafficking. Managers for abusive crews confiscate the majority of victims' earnings, making victims dependent on them for transportation and housing. Abusive managers also use psychological manipulation, violence, sexual harassment or assault, and abandonment in unfamiliar cities to pressure victims into working harder and to intimidate those who wish to leave their situation.

As with other forms of labor trafficking, trafficking in sales crews is a relatively low-risk, high-profit crime for the trafficker. With crew members receiving either a small fraction of the profit from their sales or none at all, the bulk of the profit goes to crew managers and business owners. Few managers or business owners are ever held accountable for their criminal activities. Traffickers exploit the vulnerability of young crew members, who are afforded few legal employment rights, to prevent victims from seeking assistance.

Crew members are further deterred from seeking assistance by the fact that they are typically not provided with solicitation permits, meaning that they, instead of their managers or the business owners, are likely to get into legal trouble if workers report their situation to law enforcement. Avoiding detection is relatively easy for traffickers, who take advantage of the mobility of sales crews, which rarely stay in the same jurisdiction for more than a few days. Additionally, since this is an unfamiliar model of labor trafficking, force, fraud, or coercion factors are often not obvious to law enforcement or the general public. (Read more about force, fraud, and coercion on traveling sales crews on p. 11.)



FORCE, FRAUD, AND COERCION ON SALES CREWS

FORCE

- Physical and/or sexual abuse

FRAUD

- Misrepresentation of working conditions
- Denial of wages
- False promises

COERCION

- High sales quotas and punishments for failure to meet them
- Verbal abuse
- Psychological manipulation
- Threats of abandonment
- Isolation and/or removal from familiar surroundings
- Claims that crew members are indebted to the organization
- Denial of food and/or adequate sleeping conditions

CUSTOMERS: NOT THE ONLY VICTIMS

The traveling sales business already has a poor reputation: customer complaints and civil lawsuits show that consumer fraud is common in many traveling sales companies. Yet low-level crew members, often treated as complicit in this fraud, are in many cases victims of a dangerous and highly abusive industry. According to former Better Business Bureau president Tom Bartholomy, "Customers aren't the only victims..." The young salespeople are also potentially being taken advantage of by their employers and forced to work long hours, endure substandard living conditions and have their wages withheld from them.⁶⁵

ROB'S STORY

Recently, a crew member named Rob reached out for assistance after being physically assaulted by his manager. After speaking with an operator at another hotline, Rob, a young adult male, was conferenced into the National Human Trafficking Resource Center (NHTRC) hotline. The young man explained that he joined a traveling sales crew after seeing an online advertisement for a lucrative job.

But the reality of the job was different than advertised. The crew he joined sold magazine subscriptions and walked door to door from early morning until very late

in the evening every day. When the crew members complained or did not meet their daily quotas, their manager prohibited them from eating or made them sleep on the street instead of in the hotel. Rob wanted to leave, but was unable to since he was far from home and had no money of his own.

The NHTRC Call Specialist referred the situation to a nearby service provider who helped Rob find a place to sleep that night and transportation home. In addition, the service provider offered to perform outreach for the remaining crew members. The service provider helped several other young men

leave the sales crew and reached out to law enforcement agents who ultimately arrested the manager. In less than a week, all of the victims had received bus tickets and safely returned to their hometowns.

This story is representative of the types of calls received by the National Human Trafficking Resource Center (NHTRC), operated by Polaris. Names have been changed and personally identifying information has been omitted to preserve the confidentiality of the people served.

CREW OPERATIONAL MODELS

Reports of abuses within the traveling sales industry date back to at least the 1970s, and Congressional hearings in 1987 highlighted problems within the industry, many of which uncannily mirror those in traveling sales crews today.⁶ Products involved, recruitment methods, means of controlling crew members, and the basic sales tactics of crews have remained almost constant for at least three decades, testifying to the fact that crew operators find the business model both financially rewarding and low-risk.

The basic operational model of traveling sales crews has not changed significantly since the 1970s. According to the 43 cases in which crew size was specified, crews vary in size, with approximately 10 to 40 people on most crews, but as many as 100 in some cases [Fig. 1]. Crew members are supervised by direct managers, who are in charge of acquiring housing for the night, making disciplinary decisions for the crew, and moving members from city to city every few weeks. Managers are also responsible for running morning and/or nightly crew meetings, which may stretch the work day to 10-12 hours. Long days on the road are another serious danger for crew

members. Drivers often operate crew vehicles for extended periods of time, leading to inattention and exhaustion; others may drive with expired or revoked licenses. Vehicles are often in poor shape. These risks have led to serious crashes in previous years, which is one of the few ways for a sales crew to come to local media attention. Wisconsin is the only state that regulates traveling sales crews, and it did so after the crash of a van that killed seven crew members and injured five more in 1999.⁷ The Wisconsin law, commonly called "Malinda's Law" after one of the crash victims, limits crew members' working hours and obliges crews to have vehicles regularly inspected.⁸

JOHN'S STORY

The story of John Ellison, as reported by the Associated Press in 1978, could with very few alterations be the story of many on sales crews today.⁹ Responding to an ad, Ellison met with a recruiter in Texas who promised travel, parties, comfortable housing, and the opportunity to make money with all expenses covered. In practice, Ellison had to work eight hours of selling per day followed by a three-hour sales meeting at which he

and others who failed to make their quota would be ridiculed. He saw little to none of the promised commission on sales. He and other members who wanted to leave were abandoned in Louisiana with no money in an unfamiliar place. A former crew manager also interviewed in the article indicated the elements of force and psychological coercion present on the crews, commenting that "the crew chief becomes mother, father, minister,

guidance counselor and boss... [He] makes his kids into absolute slaves... and he keeps them hundreds of miles away from home so that they have to keep working." Elements of fraud and coercion present throughout Ellison's story strongly suggest that had the Trafficking Victims Protection Act existed in the 1970s, his situation might have been classified as human trafficking.



ABANDONMENT OF SALES CREW WORKERS

“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.”

- from Polaris interview with S. Hunt

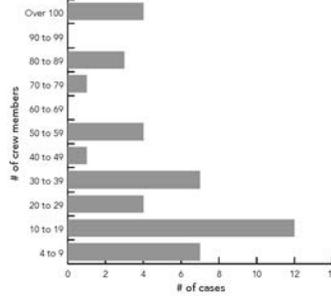
Instead of the commission on sales promised during the application process, all but the highest-performing salespeople receive a daily stipend of \$5-\$20, which must cover the cost of meals and personal items. Earnings beyond this stipend are generally kept “on the books,” and may quickly disappear to cover “debts” to the crew for housing and transportation. Members who wish to leave the crew will often be put under significant pressure to stay through the use of psychological manipulation, threats, or physical violence. If a member still insists on leaving, the crew will often abandon him or her in an unfamiliar location without money or belongings.

ITEMS SOLD

Certain industries that employ traveling sales crews stand out as particularly prone to labor abuses and potential human trafficking situations. According to Parent Watch, an organization dedicated to assisting survivors of abusive situations within traveling sales crews, the most exploitative traveling sales businesses deal in magazine sales, followed distantly by those dealing in cleaning products.¹⁸ This estimate is confirmed by data from the National Human Trafficking Resource Center hotline, which shows that 64 percent of the 357 cases which specified items sold reference magazine sales. [See Fig. 2 on page 9.] The NHTRC hotline and the BeFree Textline have received significantly less evidence of abusive activity in traveling cleaning products crews, with only 9 percent of these cases directly referencing this industry. The remaining 27 percent of reports

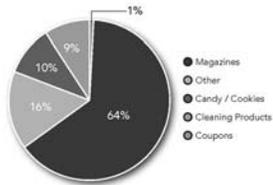
FIGURE 1: SIZE OF CREWS

Total: 43 cases reported to NHTRC and BeFree Textline



referenced the sale of any other type of product, including textbooks, cookbooks, or coupons. Based on the dates of reports of hotline data and on open source research, it is clear that some magazine sales businesses have begun to diversify their products in recent years, selling coupons for local businesses, textbooks, or devotional pamphlets either in addition to or instead of magazines. This may be explained in part by the fact that the direct magazine sales industry has built up a negative reputation which is now accessible to consumers who

FIGURE 2: ITEMS SOLD BY CREWS
Total: 357 cases reported to NHTRC and BeFree Textline



can easily look up a sales organization online. However, for the time being, magazine crews still account for the majority of NHTRC hotline and BeFree Textline cases related to trafficking in sales crews.

Door-to-door crews selling jewelry and other miscellaneous items, as well as peddling crews selling cookies and candy, appear to operate separately from those that sell magazine and cleaning products. While the NHTRC has received sporadic reports of abuse on such sales crews, these businesses employ few of the tactics which make the magazine and cleaning products industries rife with trafficking situations. Jewelry salespeople tend to be older, receive higher commissions on sales, and often provide their own transportation from town to town – meaning that while this may be a difficult and low-profit job with potential for labor exploitation, salespeople are relatively independent and elements of force, fraud, or coercion are less often present. The risk of trafficking is also lower in crews peddling candy or cookies, due to the fact that the minors on the crews typically return home every night. It should also be noted that traveling sales crews and peddling rings are both separate from groups affiliated with local schools selling magazines and other items for fundraisers. Legitimate fundraising for local schools will clearly identify the school, and provide contact information for the fundraising drive.

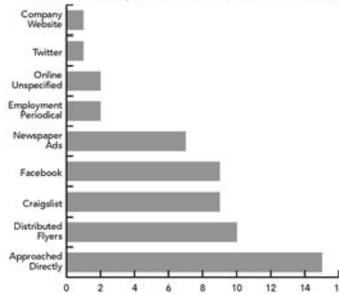
RECRUITMENT

Frequent recruitment is crucial for traveling sales crews due to the high rate of turnover among crew members. Crews use person-to-person recruitment, newspaper ads, fliers posted on college campuses, and online job postings promising fun,

travel, and high earnings to attract new members.¹¹ Fifty-six cases reported to the NHTRC hotline or the BeFree Textline describe recruitment methods, and the majority of these note that the crews had approached potential victims directly [Fig. 3]. Accounts on online forums confirm that this is a common recruitment method. Many crews attempted to recruit young individuals who were unable to afford subscriptions. Others approached strangers in retail parking lots or fast food restaurants. Online recruitment was also common, with an equal number of hotline cases referring to recruitment occurring on either Craigslist or Facebook. A minority of hotline cases referenced recruiting attempts on Twitter or other online sources.

Recruiters tend to target younger, lower-income individuals. Advertisements specify that new crew members must be at least 18, since in most states a minor cannot legally work in traveling sales due to the dangers of the job. Nonetheless, accounts from former members indicate that most crews do little to ascertain whether applicants are old enough to be legally employed, and 34 percent of hotline cases reference potential minor members. Former crew members and community members contacting a hotline or recounting their experiences online suggest that some crews deliberately recruit minors as young as 15. According to these accounts, some managers even direct minors to lie about their age and claim to be adults.

FIGURE 3: RECRUITMENT METHODS REPORTED*
Total: 56 cases reported to NHTRC and BeFree Textline



*These statistics are non-cumulative. Survivors may reference multiple methods of recruitment or may not provide this type of information.

JOHNATHAN'S STORY

A recent *Al Jazeera America* investigative article highlights the story of Johnathan, a 25-year-old Waffle House server.¹² Johnathan was working at a Waffle House in Ohio when he was recruited by some customers who kept telling him stories about the fun they were

having and money they were making traveling around the country on a magazine sales crew. The crew members were so persuasive that Johnathan quit his employment and left to join the crew without even informing his family. Weeks later, Johnathan's body was

discovered in a motel in Maryland. He had overdosed on heroin while staying with the crew in the motel. Instead of calling 911 or taking him to a hospital, his crew abandoned him in the hotel room and took his wallet, cell phone, and other belongings with them.

Recruits are typically from lower-income households, but socioeconomic backgrounds vary: recruitment ads promise high earnings, and college students from middle-income homes occasionally join the crews in order to earn money for tuition or other expenses. One former crew member interviewed by Polaris described the conundrum that faced him when he first contacted a crew after reading about the job in a newspaper ad. His mother warned him not to join, based on the negative stories she had heard about traveling sales jobs, but when he called the number listed in the ad, the recruiter "almost begged [him] to join," promising that he could earn up to \$150 per day while having a great time traveling the country, but giving him no other information about his working conditions. He explained, "I was desperate. I didn't have a job, didn't have a car. This sounded like something I could do." It came as a shock to him when the crew arrived to pick up their new

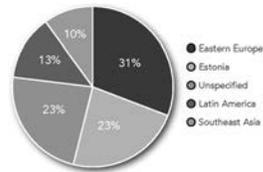
recruit: the driver and manager were drunk, 12 people were crammed into a single SUV, and at night six people were expected to fit into one hotel room.¹³

While most sales crews recruit American citizens exclusively, 39 cases reported to the NHTRC and the BeFree Textline feature workers from overseas brought into the U.S. on the J-1 visa program [Fig. 4]. One company employing workers on J-1 visas recruits from the Baltic States. Another large company recruits from South America and the Philippines. NHTRC and BeFree reports indicate that if these workers express dissatisfaction with working conditions, they may be terminated and evicted from the provided housing, which may also lead to their sponsorship being dropped. For young adults on J-1 visas, cessation of their association with their sponsor renders their visa invalid. These employees have reported to the NHTRC that their employers threatened them with deportation when they expressed a wish to quit. This threat constitutes use of coercion, since it places significant pressure on the

PEDDLING RINGS

In addition to 357 calls referencing traveling sales crews, the NHTRC has received 271 reports regarding local peddling rings. These rings differ from most sales crews in that they employ much younger minors and typically do not travel. While they often operate in violation of child labor laws and local solicitation ordinances, there is a much lower risk for trafficking in these situations, as minors generally return home after work and crew leaders have much less control over their daily activities.

FIGURE 4: INTERNATIONAL RECRUITMENT
Total: 39 cases reported to NHTRC and BeFree Textline



J-1 VISA PROGRAM

Many foreign workers' experiences on traveling sales crews reflect crews' disregard for restrictions placed on J-1 visa work programs. The U.S. Department of State explicitly prohibits J-1 visitors from working in positions that "are substantially commission-based and thus do not guarantee that participants will be paid at minimum, the federal prevailing wage."¹⁴

individual to comply with employment conditions that he or she would otherwise refuse to accept.

Because the recruitment process for these crews is so cursory, traveling sales companies rarely perform background checks on members. Accordingly, former members report that among the many salespeople with no criminal records, there are members with records that include violent crimes.¹⁵ While this is a safety concern for consumers who may interact with these individuals, it poses a much more serious risk to other crew members, particularly younger recruits. Many former members calling a hotline or writing online describe severe physical or sexual assault by managers or fellow crew members with criminal records for violent crimes. Where managers are not directly responsible for these crimes, the lack of repercussions on most crews for such activity creates a culture of acceptance for violent behavior against "weak" crew members.

FORCE, FRAUD, OR COERCION

Force, fraud, or coercion in the traveling sales industry may be initially difficult to identify, since individuals traveling with crews appear to have the freedom to leave their situation. In many situations, however, this freedom to leave is illusory or partial. Hotline cases, corroborated by open source data, indicate that workers are compelled to remain in the crews by means of isolation, denial of wages, threats, physical assault, or abandonment [Fig. 5].

Force

Former crew members describe harsh working conditions on the crews, including long days spent walking miles through neighborhoods with limited or no opportunity for breaks, early morning and late night training sessions in addition to a minimum eight hours of selling time, and fines for misconduct. However,

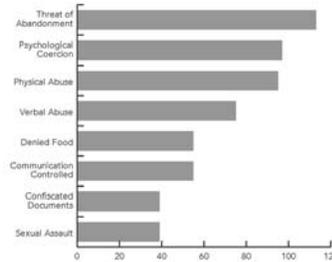
if crew members complain about these conditions or are not sufficiently successful in their sales, they may face physical or sexual violence. In nearly 24 percent of cases reported to the NHTRC and BeFree hotlines, callers indicated that managers or fellow crew members had physically assaulted salespeople who were perceived as underperformers or who wished to leave. A former crew member interviewed by Polaris recalled seeing one man from the crew followed by four other members into a hotel room where he was beaten unconscious. The interviewee also noted that crews tended to harbor hostility towards crew members who were not as well-liked, due to being quiet or being poor salespeople. While never threatened with violence directly, this member reported that one of his friends on the crew was frequently bullied and threatened with violence because he was not making enough sales.¹⁶

Fraud

Fraud is frequently employed in both the hiring process and in the remuneration of crew members. The hiring process is typically rapid; parents of crew members have reported that their sons or daughters left with the crew almost immediately after being recruited, without informing the family until they were already on the road. Many callers and crew members

FIGURE 5: MOST COMMON METHODS OF CONTROL*

Total: 419 cases reported to NHTRC and BeFree Textline



* These statistics are non-cumulative. Survivors may reference multiple methods of control or may not provide this type of information.



writing online express their dismay upon discovering that working conditions on the sales crews had been misrepresented in advertisements and throughout the cursory application process. A former crew member noted in an interview with Polaris that he first realized that he had to get off the crew when he realized how dangerous the job was. Crew members were crammed into a vehicle and new recruits or those who had not made enough sales were expected to sit in the hatch without seatbelts. This crew also made a habit of dropping members off in areas of cities with high crime rates, regardless of safety concerns, justifying the practice by explaining that it was easier to sell magazines in poor neighborhoods.¹⁷

New recruits are rarely informed that advertised sales commissions only reflect the amount that they could eventually earn by remaining on the crew long enough to move into a junior or senior management position, where commissions are much higher. In the meantime, members see little to none of even the small commissions they could earn, since these routinely evaporate once crews charge members for housing and transportation costs – expenses which members are not warned of before joining. Advertised financial bonuses likewise prove largely unattainable due to the high number of subscriptions that would have to be sold in order to earn them. In the end, most members are left with only a \$5-20 daily stipend to live

on. The former member interviewed by Polaris had received a stipend of \$20 per day for the first few days, but received nothing after that, with the result that he went without food for days.¹⁸

In addition to misleading recruitment and financial fraud, many callers report that they were not informed of the level of illegal activity – including drug use, alcohol abuse, and sexual harassment – regularly occurring on crews. A number of former members were disconcerted by the misleading or openly fraudulent sales tactics of the crews. As one salesperson recounted in a public blog post about magazine sales crews, “I was trained to lie my way into a sale... The job wasn’t by any means honest. Had I made a dime doing this, I would’ve felt terrible taking it.”¹⁹ One former member commented in an interview with Polaris that his crew was sent into economically depressed areas of larger cities and told that it would be “easier to sell subscriptions to people who don’t know any better” – reflecting a disdain for buyers of overpriced magazine subscriptions and implying that crew members were expected to trick customers into purchasing these.²⁰ In addition, members often report having been sent into towns to sell without legal permits, often without being told by the manager that they needed such a permit.

KEVIN'S STORY

Kevin was recruited by a crew member who came to his door selling magazines. When Kevin revealed that he was experiencing financial difficulties, the worker offered Kevin a job and a signing bonus. The crew that Kevin joined was under the control of several managers, all of whom openly boasted about their arrest warrants. These managers would frequently compel the crew members to work from eight in the morning until after midnight, would require them to reimburse the business for lodging and gas costs, and would only pay members if they met their daily quotas. Members who performed particularly well were typically paid in drugs instead of

cash, and Kevin never saw the signing bonus he had been promised.

Kevin reported to the NHTRC that all the workers he interacted with while on the crew said that they wanted to leave. However, they were afraid to do so because of their managers' reputations. Workers who did try to leave were often beaten severely and in some cases were sexually assaulted by either the manager or the senior salespeople. When Kevin himself tried to leave, one of the managers threatened to kill him and confiscated his identification documents.

Eventually the managers decided that Kevin was not making enough sales, so

they abandoned him without returning his identification. Kevin was able to contact the NHTRC for assistance, and NHTRC specialists were able to put Kevin in contact with an emergency service provider. The provider was able to arrange temporary housing and a local job for him.

This story is representative of the types of calls received by the National Human Trafficking Resource Center (NHTRC), operated by Polaris. Names have been changed and personally identifying information has been omitted to preserve the confidentiality of the people served.

Coercion

Managers control nearly all aspects of the lives of crew members and drivers while they are on the road, isolating them from family and the communities in which they are selling by imposing long work hours, moving frequently, and controlling after-hours activity.⁷³ On abusive crews, coercion is also frequently used to incentivize higher sales. Typical crews have a sales quota of three to seven sales per day, according to both hotline and open source data. Failing to meet the day's quota often results in at least verbal abuse, if not physical assault (see "Force," p. 11). People contacting the NHTRC hotline or the BeFree Textline commonly report that managers will force crew members who do not make their quotas to sleep on the floor or will refuse to give them an allowance for food.

Frequent travel has the effect of removing youth who sign up for these sales crews from familiar surroundings. Crews move to new cities every few weeks, with the result that members have no chance to familiarize themselves with any local resources that might be available to them if they want to leave

the crew. This also means that members rarely have the time or space to communicate with family or friends at home. In 55 cases, individuals contacting the NHTRC have reported that their communications were closely monitored; in three cases, potential victims could only contact the NHTRC from public library computers. In a number of other cases, managers had confiscated or destroyed cell phones belonging to crew members. In 40 cases, managers had confiscated drivers licenses or other documents, without which members were unable to board a bus or rent a car to leave. Even in situations where crew members have relatively more freedom to communicate and have control of their documents, they are frequently unable to leave for financial reasons. Few crew members see more than a small stipend at the end of a week of sales, due to high quotas and charges for housing and transportation. In addition, in 40 cases, callers were told that they could not leave the crew due to being in debt for housing and transportation.

Beyond communication and identification control, crews exert significant psychological pressure to prevent some members

SAMANTHA'S STORY

Samantha, a young magazine crew worker, called the National Human Trafficking Resource Center hotline (NHTRC) to request help finding shelter. Samantha had responded to a newspaper ad promising a fun, well-paying job and a \$450 signing bonus. Not only did Samantha never see this bonus, but once on the crew, she discovered that the crew members were not paid either an hourly or a commission-based wage. Instead, they were only provided a small daily stipend for food and were charged for accommodation and gasoline. Salespeople who could not sell a daily quota of six subscriptions became more and more indebted to the crew for food and lodging every day they could not make their quotas.

Because this crew did not provide its members with proper sales permits, Samantha was soon cited for solicitation. Her crew leader held all the paperwork related to these citations and refused to allow her to return to respond to the citations. As a result, Samantha began to fear that she might have arrest warrants and became reluctant to leave the crew because it seemed to be the only thing protecting her from being arrested. At last, however, she had no choice but to leave. Eventually she was injured while on her sales rounds. In response, her manager fired her and abandoned her.

In this case, local service providers, call specialists at the NHTRC, and local law enforcement were able to work together to

help Samantha get the shelter she needed and to mitigate any legal problems resulting from the citations. However, many other crew members remain unable to leave their crews or are left with no resources when they are abandoned. Better awareness of the problems associated with traveling sales crews among service providers, law enforcement, and the general public can help connect young people like Samantha with the services they need.

This story is representative of the types of calls received by the National Human Trafficking Resource Center (NHTRC), operated by Polaris. Names have been changed and personally identifying information has been omitted to preserve the confidentiality of the people served.

from leaving. Former members and those who have worked extensively with victims repeatedly use the phrase “cult-like” to describe the level of pressure crews exert on their members. Compulsory morning or night meetings involve lectures, songs, and chants about “positive attitude,” “toughness,” or “good work ethic” – messages echoed on crews’ social media accounts – while unsuccessful members are called out and shamed by the group. Crew leaders promote the message that if crew members only put more work in, they will begin to make big money.²² They lecture about the “exciting, challenging” life on the crew, contrasting it with the supposedly humdrum, stodgy life of “the Joneses” or the “9 to 5 schmucks” – terms used across the traveling sales industry that create a sense of separation between crew members and non-members.²³ In many cases, crews further build group cohesiveness by throwing parties for successful salespeople after hours. Former members have described these parties as involving excessive drinking and drug use, with 30 callers noting that alcohol and drugs were provided by managers to reward crew members who met or surpassed their quotas. These parties also linked to sexual harassment for female members, with 40 callers (10 percent) referencing sexual harassment or abuse related to after-hours activities. Some former members even describe a practice of “putting people over” – or paying veteran crew members to sleep with new recruits at these parties and potentially form relationships in order to manipulate them into staying.²⁴

Former members indicate that any form of dissent – such as questioning fraudulent sales practices, expressing exhaustion, being unwilling to participate in crew parties, or wanting to leave the crew – is termed “negativity” by crew operators. “Negative” members are stigmatized by both managers and other crew members. Detective George Dahl of Louisville, Kentucky describes the psychological pressure exerted by crews as some of the most extreme he has encountered in years of police work.²⁵ If members express intentions to leave the crew, coercion often becomes even more evident. Abusive crews have reputations among members for assaulting or abandoning salespeople who wish to leave. These implicit, or often explicit, threats prevent many members from attempting to leave. The threat of abandonment is particularly powerful, since members

FORMER CREW MEMBERS SPEAK OUT

“Stay away from all these crews they are nothing but modern day slave shops and bad news...I would like to see these crews be banned and outlawed before other young adults or teens falls victim.”

- Posted on Facebook group, Abolition Movement against Human Trafficking on Mag Crews

frequently have no money left once their extensive debts to the crew are covered, and when abandoned, members will frequently find themselves stranded at a bus station or alongside the road without a ticket or any resources to buy one. Over 25 percent of all cases reported to the NHTRC and BeFree involved potential victims who had been abandoned in an unfamiliar location by their crews.

In some instances, members have also been arrested for violating local sales permit laws, making it even more challenging for them to leave the crew safely. Some crews leave arrested members behind. Others bail them out of jail. However, former crew members on five major online forums that host survivor accounts have noted that it was not uncommon for members who had been arrested to be compelled to continue to another city with the crew before their court dates, leaving behind an outstanding warrant and a criminal record.

CULT-LIKE TACTICS ON SALES CREWS

“It was a freaking cult! We lived with our co-workers who took every opportunity to end your contact with the outside world beyond your door-to-door ventures...

We started every morning with JUICE [Join Us In Creating Excitement] chants, and were not allowed to drive our own cars to the work sites. When we came back after a LONG 8 hours of walking in dress shoes, we were not allowed to lean against the wall. I was once pulled to the side and told not to lean because it was a sign of weakness and it would bring the rest of the group down. The group was taught to ignore people who leaned or showed any 'negative' gestures.”

- Posted on Experience Project, <http://www.experienceproject.com/stories/Was-Recently-On-A-Mag-Crew/4601>



BUSINESS NETWORK CHARACTERISTICS

Traveling sales businesses vary in size and structural complexity. Some operate as solo crews and others act as a central node in a network of dozens – in some cases as many as a hundred – separate selling crews. Business owners and managers rake in the bulk of the profits from sales made, while salespeople are often charged for transportation and housing, and then barely receive enough money to pay for their meals.

SHIFTING LOCATIONS

Traveling crews move frequently from location to location, sometimes remaining within a single area for several weeks, but rarely lingering for longer. Individual crews within an organization usually travel alone because it is more profitable to have a monopoly on sales activity within a town. It is common for crews to sell in smaller cities and towns with moderately-sized residential neighborhoods. Military bases and truck stops are also occasionally targeted by crews.²⁶

Crews typically travel in one or a fleet of full-sized vans, depending on the size of the crew. Some crews have been known to travel in full-sized SUVs or smaller vehicles as well. Most crews avoid operating in the north during the winter, but recent analyses do not indicate any additional geographic patterns in the movement of crews. Distance between operating locations appears to be limited only by the distance a crew can feasibly travel in a day, and it is common for a crew to move several states away in a single day.



Figure 6: Location of human trafficking cases referencing traveling sales crews reported to NHTRC and BeFree (2007-2015). This map only reflects cases where the location of the potential trafficking was known. Some cases may involve more than one location.

While on the road, crews typically stay at low- to middle-cost hotels or motels, often cramming far more people in each room than the hotels allow. In a few notable exceptions, crew members have reported that if they did not make enough money during the day, they would sleep in the vans. Det. Dahl observes that crews often avoid law enforcement entanglements by selecting hotels well outside the jurisdiction of the police department working in the area in which the crews are operating.²⁷ 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 legally.

RELATIONSHIPS BETWEEN INDUSTRY ACTORS

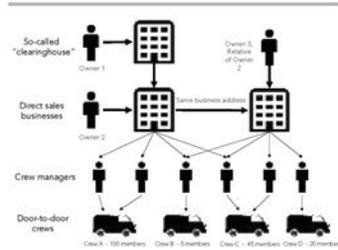
Relationships between potentially linked entities within the business network can be a challenge to untangle. Many traveling sales companies, particularly those with a long record of fraud-related complaints, change their names and operating locations while remaining under the same ownership and management. In some cases, businesses will re-register in another state under another name; in others, they informally use another advertising name while remaining in the same city at the same address. The map in Fig. 7 shows a high concentra-

tion of business locations in Nevada, Arizona, Colorado, and Indiana. These concentrations are present in part because each is the home state of at least one traveling sales company under many different names – one case prosecuted by the Colorado Attorney General in November 2012 against the Great Lakes Circulation magazine sales network for consumer fraud involved 10 distinct company names, all of which were engaged in the same line of business and run by the same two individuals.²⁸ Many former salespeople from these networks report that even they are unsure of the exact name of the company for which they had worked.

Order forms and receipts handed out for many of these companies list a “clearinghouse” as the entity responsible for ensuring that customers’ orders are fulfilled. Business records indicate that these so-called clearinghouses are often closely affiliated with the sales companies, often owned by traveling sales company owners or their relatives, and frequently using the same addresses or phone numbers as the sales company. Experts on the traveling sales industry suggest that the layering of business entities is intended to provide a buffer that protects those at the highest levels of the network by providing them plausible deniability in case of accusations of fraud or worker abuse.



Figure 7: Public business records and hotline data indicate the locations of registered traveling sales businesses in the United States with high concentrations in Nevada, Arizona, Colorado and Indiana.



Traveling sales networks frequently feature a number of direct sales businesses connected through their addresses and/or by associations between owners. Many times, one or several direct sales businesses claim to be selling on behalf of another organization, often called a "clearinghouse" by crews. Crew managers typically travel one or two to a crew, depending on the size of the crew.

The question of which crew is affiliated with which business may be further complicated by the fact that businesses have been known to cooperate in several areas. Notably, three or four large networks may simultaneously have their salespeople claim to be competing for the same cash prize sponsored by a vague, innocuous-sounding organization such as "American Awards" or "National Sales Awards." A number of reports also indicate that different traveling sales businesses occasionally cooperate when canvassing different areas, then resume competing with one another when selling in the same neighborhoods. In at least three cases, crew members have reported that salespeople have been "sold" against their will to another crew.

The legitimate publishing industry has a complicated relationship with clearinghouses and traveling sales companies. Due to the layering of the sales industry, the periodical industry has limited insight into and control over how magazines are sold. Since 1999, the Federal Trade Commission (FTC) has required that publishers exercise some level of oversight over who sells their magazines. However, as Bridget Wells of Periodical Watchguard noted in recent interviews with Polaris and in *The Atlantic*, a number of publishers only store the selling company's name and Employer Identification Number (EIN) in order to satisfy the most basic FTC requirements.²⁹ Wells also noted that most publishers do not have resources

readily available to monitor all of their selling agents, particularly when sales businesses flagged as abusive will simply change their name and re-register in another state.³⁰ Publishers also have mixed sentiments regarding the utility of the crews. Some publishers go so far as to call mag crews "unauthorized agents"³¹ who harm the reputation of the magazine. Michael Pashby, former executive VP and President of the Magazine Publishers Association PA, similarly claims that "a lot of publishers have no clue that their magazines are being sold this way, and they would be shocked."³² By contrast, Wells notes in her *Atlantic* interview that some publishers "don't care, so long as it's not fraud."³³ Finally, publishers have no control over totally fraudulent situations in which unregistered traveling crews carry fake order forms for magazines which they cannot in fact provide to the customers.

**AN ALTERNATIVE OPERATING MODEL:
STATIONARY SALES CREWS**

The bulk of this report has focused on traveling sales crews, the chief hallmark of which is their frequent long-distance movement across regions of the United States. However, more geographically stationary variations on this model have begun to operate in Florida, Kentucky, New York, and elsewhere in recent years, according to interviews with Earlene Williams of Parent Watch and Det. Dahl. Both Williams and Dahl indicate that this may be part of a shifting operating model by door-to-door sales businesses. Crews appear to be attempting to operate at a lower profile than in previous years, due in part to increased awareness of the dangers with sales crews, and also to a growing number of civil fraud cases brought against businesses by state governments. While in previous years the movement of crews from town to town proved a convenient protection against local prosecution, the traveling sales industry has acquired a highly negative reputation for consumer fraud, which is reflected at the Better Business Bureau and in many other online sources. With this greater level of information available to the consumer, it is plausible that crews have found that being non-local only raises questions which are now easily answered by a few minutes of research.

These stationary crews still operate in a manner that puts members at risk for labor trafficking, and operate similarly to traveling magazine crews except for the fact that they tend to stay in one location for several months at a time, frequent-

FORMER CREW MEMBERS SPEAK OUT

“Mag Crews are not ALL bad, but I will never allow my babies to join one. The bad ones are great at brainwashing and making you feel like nothing, making you feel like you NEED them to survive.”

- Posted on Facebook group,
Abolition Movement against Human Trafficking on Mag Crews

ly cooperate with local sales ordinances, and currently tend to sell coupons for local businesses instead of magazines or other products. Crew managers still maintain close control over potential victims. Williams, Dahl, and former members describe situations in which crews are based out of network owners' houses or long-term hotels, often in a remote location or on the outskirts of town so it is difficult for members to orient themselves or get to a transportation hub. Williams and Dahl also both noted that these relatively stationary crews still tend to rely on young workers who are not originally from the area so that crew members are usually not aware of resources available to them.

Recent business model shifts

Another challenge in sorting out the bad actors in the traveling sales industry is that over the past two to four years, some larger networks have been replaced by smaller crews. These crews are more flexible in terms of movement, identity, and management structure than the larger, more well-established traveling sales businesses, which tended to dominate the industry between the 1990s and approximately 2012 based on hotline data and business records. According to Earlene Williams, many sales company owners who were formerly associated with potential trafficking situations have gone into other lines of work. Increasingly, crews are being handed over to a younger generation of managers who do not have a history of lawsuits or criminal records. Better Business Bureau reports and online complaint forums appear to corroborate this, showing a

slight reduction in complaints about larger traveling sales networks. Yet, Williams also describes the industry as being nearly impossible to break into without pre-existing connections to the older generation of door-to-door sales businesses. Hotline data and business records likewise continue to show connections between new and old companies, including use of the same business addresses, social connections between former and current owners, and continued use of old business names on receipts. This informal continuity suggests that the change in ownership does not indicate a fundamental shift in operating philosophy, but is simply an attempt to build up a new, cleaner-looking network in response to increasing media and law enforcement scrutiny of the door-to-door sales industry.



ATTEMPTS TO REGULATE THE TRAVELING SALES INDUSTRY

Despite long-standing recognition of abuses within the traveling sales industry, attempts to regulate the industry have proven difficult to advance. One challenge is that business owners are able to classify sales crew members as independent contractors or outdoor salespeople – segments of the labor population in the United States that are afforded almost none of the federal labor protections which direct employees receive. Both independent contractors and outdoor salespeople are exempt from the Fair Labor Standards Act (FLSA), which means that businesses are not required to pay them a minimum wage or compensate them for overtime.

The amended Title VII of the Civil Rights Act of 1964 provides protection to employees from discrimination on the basis of pregnancy and related conditions, but does not provide these protections for employees with FLSA-exempt status.³⁴ Similarly, most states have laws that prevent employers from firing employees who are injured on the job due to their injuries; again, independent contractors do not receive this protection.³⁵ Ten hotline reports describe crew members being abandoned without pay by their crew after injuring themselves, becoming ill, or becoming pregnant. In several more cases, crews charged members who were pregnant or injured hundreds of dollars in “housing fees” for each missed day of work.

In the 1980s, efforts began to address abuses on sales crews either directly or under the umbrella of child labor abuses. A bill proposed by Rep. Ron Wyden of Oregon in 1985 would have established a “National Clearinghouse on Fraudulent Youth Employment Practices” to oversee door-to-door selling groups, among other entities, but the bill died in congress due to inadequate support from the Department of Justice, which argued that any action would be premature given that the extent of the abuses in the industry were not sufficiently well-known.³⁶ During the 106th Congress in 1999, Sen. Herb Kohl

of Wisconsin proposed the “Traveling Sales Crew Protection Act” inspired by proposed state-level regulation in Wisconsin. No action was taken on the bill during this congressional session, and though modified versions of the bill were proposed at the 107th and 108th Congresses, the legislation did not move forward.³⁷ In 2003, Rep. Tom Lantos of California introduced the “Youth Worker Protection Act,” which specified that minors could not be legally employed in traveling sales.³⁸ No action was taken on this bill at the time, but current federal youth employment regulations do restrict 14 to 15-year-olds from occupation in “youth peddling,” which covers activities associated with traveling sales.³⁹

One of the few notable successes in regulating traveling sales crews occurred at the state level. Wisconsin’s “Malinda’s Law,” passed in 2009, is named after one of the victims of a van accident that killed seven teenage members of a magazine sales crew near Janesville, Wisconsin in 1999. The law provides clear employment protections for traveling sales crew workers, limiting them to working between 9:00 am and 9:00 pm, requiring that they be paid semi-monthly, and obligating managers to ensure that transport vehicles are regularly inspected and drivers are insured.⁴⁰ In addition, the law requires any

traveling sales crew operating in Wisconsin to register with the state, providing proof of identification and criminal records for each member and clearly identifying the crew manager and the terms of employment.⁴¹ Crews must also comply with local rules for obtaining sales permits under this law. The law has been used in one major case against a traveling sales company to date. In 2013, a Utah-based company was operating in Wisconsin in violation of requirements established by Malinda's Law: members were transported in a van by drivers without proof of insurance, and were required to sell without registering with the state or obtaining sales permits.⁴² When the 12 college-age crew members discovered that they were operating illegally and protested, the company attempted to

fire them. Malinda's Law afforded the crew members legal protection from such retribution, and the Wisconsin Department of Justice was able to pursue the case, which ended in a \$15,000 settlement.⁴³ The success of this law in pursuing abuses committed by traveling sales companies has reportedly led crews to avoid Wisconsin altogether, according to hotline data, accounts on social media, complaints forums, and an investigative report by Al Jazeera America.⁴⁴ This suggests that adoption of similar laws in other states would allow for better protection of potentially vulnerable employees and reduce the risk of labor trafficking in the industry.

PROSECUTING TRAFFICKING ON SALES CREWS

Charging sales crew operators with trafficking is extremely uncommon to date, but in 2014, two crew leaders in the magazine sales business working for Midwest Circulation were arrested in Wilmington, NC and charged with kidnapping and trafficking for holding two minors against their will and compelling them to work on the crews.⁴⁵ Police said that the men persuaded two 15 and 16-year-old sisters from North Dakota to join their crew. Once on the crew, the sisters were compelled to work for only \$20 dollars a day, denied communication, and forced to stay when they asked to leave the crew. Felony charges against the two managers were eventually dropped in exchange for cooperation in the investigation, which as of May 2015 is ongoing. Each manager pled guilty to two misdemeanor counts for contributing to the delinquency of a juvenile. However, police indicated that trafficking charges may still be brought against other individuals associated with the Midwest Circulation network. This case was significant in that it dealt with abusive traveling sales networks from a human trafficking angle instead of a fraud angle.



THE CONSEQUENCES OF ILLEGAL SOLICITATION

“ We went into a new town with no permit for that town and that day police were not having it. You are required to have a permit for each town you sell in the cop said and this guy did not and never even tried to get one except that one time because it was a new state and because it was Wisconsin and all the locals were against door to door sales because of them kids dying in that Janesville crash. If we were stopped and warned by cops we were then blamed for it and drove to a new neighboring town to knock on doors without permits just as we was told not to. I got a 200.00 fine in Sun Prairie Wisconsin for it and the manager lied and said he had paid the ticket and did not. I almost had a warrant but I was sent home just in time because I was starting to see the bullshit this job is really about.”

- Posted on Facebook group,
Abolition Movement against Human Trafficking on Mag Crews

CONCLUSION AND RECOMMENDATIONS

Traveling sales is an industry rife with abuses that in many cases constitute labor trafficking. While some door-to-door sales businesses, particularly those outside the highly problematic magazine sales field, are harmless, the structural problems highlighted in this report – most notably the exemption of outdoor salespeople from FLSA protections and the lack of background checks in hiring – prime the industry for abuse. Well-intentioned business owners should have no trouble agreeing that workers deserve fair treatment, while worker advocates can agree that one of the best ways to prevent abuses is to ensure that legitimate companies are able to flourish in the current market environment.

Despite this fact, the door-to-door sales industry has historically attempted to shed responsibility for these abuses by categorizing salespeople as independent contractors and denying knowledge of abusive activity on the crews. Bad actors within the industry are practiced at evading detection by changing business names and locations frequently. They have created a layered business network model that provides a buffer between criminal activity that occurs on crews and company owners. While industry efforts may help clean up the traveling sales industry, enforcement of higher standards will require the support of state departments of labor and other regulatory entities. Adoption of standards analogous to those in Wisconsin's Malinda's Law would assist other states in prosecuting those responsible for exploiting young workers, rather than leaving the workers themselves vulnerable to prosecution.

Government entities, law enforcement, service providers, businesses, and consumers can and should take action in order to protect workers from abuse and exploitation, and reduce trafficking in this industry. Select government and law enforcement entities have already met with some success pursuing traveling sales crews. Most notably:

- In 2012, the Colorado Attorney General's Office shut down most of the Great Lakes Circulation magazine sales network by issuing a permanent injunction against Great Lakes Circulation, its owners, and nine associated or alias businesses for fraud-related charges.⁴⁶ While this did not result in trafficking charges for the owners, reports of activity by this network dropped to almost zero after 2012.
- In August 2013, the Wisconsin Department of Justice used Malinda's Law to achieve a \$15,000 settlement for 12 college-age crew members against a Utah-based company operating in Wisconsin in violation of regulations instituted by this law.⁴⁷
- In October 2013, Palm Bay, FL police rescued 24 children from a potential trafficking situation. The two crew operators were charged with 24 counts each of human trafficking, 24 counts of child abuse, and eight counts each of employing a minor.⁴⁸ Due to the small size of this crew, the arrest of the two managers appears to have effectively shut it down.

As these examples illustrate, it is possible to shut down or penalize abusive networks through application of existing laws relating to fraud, labor abuses, and human trafficking. The crucial stipulation is that any action should address the abuses

SURVIVOR TO LEGISLATORS:

“There’s no regulation. These managers can do whatever they want. It made my heart sink when I started hearing about conditions on other crews – I was lucky to get out. Something needs to be done to regulate mag crews because these managers are doing whatever they want to 19-year-old kids who don’t know what they’re getting into.”

- from Polaris interview with S. Hunt

in a manner that holds accountable the businesses concerned, the owners, and any highly associated businesses in the same industry. Otherwise, it will be “business as usual” for the most abusive crews, as seen in the many cases where suspicious businesses have been fined for tax evasion or minor fraud in various states.

GOVERNMENT RECOMMENDATIONS

Federal

- The Fair Labor Standards Act (FLSA) should be amended to cover outdoor sales workers, which would in turn enable the Department of Labor to address abuses occurring in traveling sales crews, including but not limited to:
 - Underpayment of wages;
 - Misclassification of employees as independent contractors, and;
 - Misrepresentation of working conditions.

- Sales crew members are not exempt from FLSA Child Labor regulations, and the Department of Labor should ensure that these regulations are fully enforced on traveling sales crews. Currently, federal regulations prohibit the employment of minors younger than 16 in “youth peddling” occupations.⁴⁹ They also prohibit minors between 16 and 17 from operating motor vehicles for their jobs, which means that sales crews should be prevented from using minors as van drivers.
- Congress should introduce and pass legislation similar to the 2003 Youth Worker Protection Act, which would classify traveling sales as a hazardous occupation closed to all minors.⁵⁰
- The IRS should hold sales crew employers responsible for providing the required Form 1099-MISC to document expenditures of more than \$600 on independent contractor fees instead of placing penalties on sales crew workers classified as independent contractors.
- The Department of State should investigate abuses of the J-1 visa program and work to limit recruitment for non-qualifying jobs under this category.
- The Department of Justice’s Human Trafficking Prosecution Unit should prioritize labor trafficking on traveling sales crews, and should provide assistance to U.S. Attorney’s offices as well as federal and state agencies in prosecuting these cases.
- The federal government should ensure adequate funding for services designed to assist victims of human trafficking, including victims of labor trafficking on sales crews.

State

- State legislatures should consider labor protection laws similar to Wisconsin’s Malinda’s Law (Wis. Stats. § 103.34)⁵¹ that provide concrete ways to hold businesses accountable for their dangerous operating methods. These include:
 - Limiting salespeople’s working hours;
 - Requiring semi-monthly payment for employees or contractors, and;
 - Ensuring that transportation vehicles are inspected.

In addition, states may partially remedy the gap that exists in federal labor laws which makes traveling salespeople exempt from FLSA coverage by ensuring that their own labor laws do provide protection for door-to-door sales workers. State depart-

ments of labor can assist in scrutinizing whether or not salespeople have been properly classified as “outside salesmen” and/or “independent contractors” based on state labor regulations.

- State governments that have not already done so should enhance civil remedies for individuals who have experienced trafficking situations, employment misclassification, wage violations, or other abuses on traveling sales crews. For example, as of January 2015, Michigan law provides a private right of action for human trafficking victims, in addition to stiff criminal penalties.³⁷
- Where appropriate, state Attorneys General should consider initiating fraud cases against known abusive sales crew networks. These cases should encompass as many entities within the network as are associated with criminal activity, in order to prevent one prosecuted business from reemerging under one of its aliases. Common forms of fraud include:
 - Failure to deliver ordered items;
 - Misleading consumers to believe that they would be able to obtain a refund for orders placed with sales crews, and;
 - Misrepresentation of affiliation with charities or other entities including hospitals, schools, or veterans associations.
- State and local offices of consumer protection and departments of labor should publish informational materials to highlight to potential consumers and jobseekers the known hazards of traveling sales crews.

LAW ENFORCEMENT RECOMMENDATIONS

- Look for signs of human trafficking [See Appendix I] when stopping crew members for traffic violations or for door-to-door solicitation. Warning signs include:
 - Young drivers transporting large groups of other young people in vans or other large vehicles;
 - Drivers of such crews who appear excessively tired, and;
 - Drivers of such crews who have no license or who have a history of traffic violations.
- Prioritize pursuit of bad actors towards the top of the sales network rather than focusing on crew members violating local anti-solicitation laws.

SERVICE ORGANIZATION RECOMMENDATIONS

- Most survivors’ immediate needs when leaving a traveling sales crew are short-term shelter and transportation home. Ensuring that there are resources available to help survivors with no money to purchase a bus ticket and find a place to stay in an unfamiliar town should be a priority for service organizations. The National Human Trafficking Resource Center may be able to provide additional referrals.
- Encourage and assist former crew members who show signs of having been in a trafficking situation to access federal funds available for trafficking survivors through the Department of Justice and the Department of Health and Human Services. (See Appendix I – “ATEST Guide to Anti-Slavery Funding” for more information on resources available for survivors of human trafficking.)
- Be aware that some survivors, both male and female, have had extremely traumatic experiences of psychological control, physical abuse, and sexual assault, and design responses to be sensitive to these possible experiences.

BUSINESS RECOMMENDATIONS

Door-to-door sales industry

- Door-to-door sales businesses looking to rebuild the industry’s reputation should:
 - Take a stand against businesses which make evasive responses to complaints;
 - Exercise more oversight over hiring and operating practices, and;
 - Denounce business practices which allow vulnerable young people to be exploited.

Publishing industry

- Increasing attention to abuses within these crews should incentivize publishing companies to dedicate resources to this fight in order to protect their brand reputation. Making efforts to ensure a transparent business supply chain will result in better business practices, as well as traceability of copyrighted materials, which will help to protect workers and prevent bad actors from associating themselves with publishers’ brands. However, it is likely that publishers will not be able to fully oversee sales agents using only their

SURVIVOR TO CONSUMERS:

“Don’t buy magazines from these crews, don’t support them.
If the kid at your door seems desperate to make a sale,
try to help him or her get home instead.”

- from Polaris interview with S. Hunt

own resources, and they should be prepared to cooperate with government entities in the case of investigations of bad actors within the door-to-door sales industry.

Hotel industry

- Crews often house large numbers of people in one or two hotel rooms in violation of fire codes. Members also frequently engage in drug use while housed in hotels. Both trends put the reputation of low- to middle-cost hotel chains at risk, and may even lead to liability issues for the hotel.
- Training hotel staff to recognize indicators of traveling sales crews could help them to enforce policies on illegal behavior in hotels. Better enforcement of these policies could in turn help reduce opportunities for abuse, since currently crew managers will force unsuccessful salespeople to sleep on the floor or crowd into one bed, and many reports of sexual abuse are linked to drug and alcohol abuse by crew members in hotel rooms.
- The hotel industry should partner with service providers to provide hotel vouchers to victims who are newly homeless as a result of being abandoned by a sales crew. The hotel industry is uniquely positioned to address the growing need for safe, temporary shelter for this population.

Bus companies

- Bus stations are another major point of contact between potential victims and the public. Crew members abandoned at bus stations frequently have no money for a ticket home, and may not even clearly understand that they have been involved in a job fraught with labor rights violations. Ticket agents and bus drivers should be trained to recognize signs that a would-be passenger has been abandoned by a sales

crew. Employees should be equipped with a list of resources such as the NHTRC hotline or BeFree Textline numbers for potential trafficking victims. Additional resources available to abandoned crew members are Travelers’ Aid or the National Runaway Safeline, which can provide critical transportation assistance, though they do not directly deal with trafficking. In addition, transportation companies should partner with service providers and/or the NHTRC to provide transportation vouchers to victims.

CONSUMERS

- Consumers should use caution when buying magazines or other items from sales crews which are not clearly affiliated with a local organization, such as a school. Subscription prices available when buying directly from the publisher are much lower, and despite sales pitches which claim that profits from door-to-door sales will be donated, this is almost never true. It is safer to donate money directly to a legitimate charity, and buying from abusive sales crews will only continue to make door-to-door sales a high-profit industry for would-be traffickers.
- Be alert to suspicious job advertisements in newspapers and on job websites, Craigslist, or social media pages. Where these ads seem particularly suspicious, it may be helpful to flag them as potential fraud or abuse.
- Give the NHTRC (1-888-373-7888) and BeFree (233733) hotline numbers to sales crew members who display signs of being at risk for trafficking. [See Appendix I.] Do not attempt to follow the crew member or intervene directly.

APPENDIX I: RESOURCES

To report potential labor trafficking:

Polaris – www.polarisproject.org

Polaris BeFree Textline: Send a text to:
BeFree (233733)

The National Human Trafficking Resource Center –
traffickingresourcecenter.org
1-888-373-7888

To report labor abuses or fraud:
U.S. Department of Labor (DOL) – www.dol.gov

DOL Wage and Hour Division (WHD) – www.dol.gov/whd
WHD helpline: 1-866-4USWAGE (1-866-487-9243)

DOL Occupational Safety and Health Administration (OSHA) –
www.osha.gov
OSHA hotline: 800-321-OSHA (800-321-6742)

Better Business Bureau – www.bbb.org

Other resources for survivors:
National Consumers League – www.nclnet.org
Child Labor Coalition – stopchildlabor.org

National Runaway Safeline – www.1800runaway.org
1-800-786-2929

Travelers Aid International – www.travelersaid.org

Parent Watch – www.parentwatch.org 917-579-4641

More Information:

NHTRC Traveling Sales Crew Training Materials:

- <http://traffickingresourcecenter.org/resources/human-trafficking-and-sales-crews>

- www.traffickingresourcecenter.org/labor-trafficking-venues/industries/sales-crews-peddling-begging-rings

Louisville Metro Police Guide:

- http://graphics8.nytimes.com/packages/pdf/national/Louisville_Police_Guide.pdf

Georgia Office of Consumer Protection:

- <http://ocp.ga.gov/consumer-topics/traveling-sales-crew>

Alliance to End Slavery and Trafficking (ATEST) Guide to

Anti-Slavery Funding:

- <http://www.endslaveryandtrafficking.org/anti-slavery-and-human-trafficking-appropriations/>

Wisconsin Department of Workforce Development –
Regulation of Traveling Sales Crews

- Explanation of Malinda's Law (Wisc. Stats. § 103.34):
https://dwd.wisconsin.gov/dwd/publications/erd/pdf/erd_17300_p.pdf

- Full text of Malinda's Law: <http://docs.legis.wisconsin.gov/statutes/statutes/103/34>

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The CHAIRMAN. Thank you, Ms. Sorensen.
Ms. Goetsch.

**STATEMENT OF ESTHER GOETSCH, COALITION BUILD
SPECIALIST, TRUCKERS AGAINST TRAFFICKING**

Ms. GOETSCH. On behalf of Truckers Against Trafficking, I would like to thank Chairman Thune, Ranking Member Nelson, and the other distinguished members of this Committee for inviting us into this important hearing.

We want to applaud the Committee's efforts to bring attention to the horrific crime of human trafficking, and recognize that it's going to take all of us—legislators, survivor-leaders, nonprofits, law enforcement officers, industry members, state agencies, and the general public—all doing our part to truly assist victims as well as prevent future ones.

On January 6, 2015, an RV pulled into a truck stop in Virginia. Police were soon called to the scene. When they arrived, and after interviewing the occupants of the vehicle, the horrific story made headlines. A young woman, 20 years old, had been kidnapped 2 weeks prior out of Iowa. She had been beaten, raped, her whole body burned by instruments heated on the RV stove, branded, and starved.

She was being sold by her traffickers, Laura Sorenson and Aldair Hodza, through sex ads on Craigslist, where men were purchasing her and then arriving to the RV to rape her. She was dying from malnutrition and the torture she was subjected to.

Had the call not been made that brought law enforcement out to that truck stop, doctors said she would have died within the next few days. That call was made by professional truckdriver Kevin Kimmel, who recognized that something was off, something was wrong, and instead of turning a blind eye, he picked up the phone. She calls him her guardian angel. He calls himself a Trucker Against Trafficking.

People ask us, why truckers? And there are actually quite a number of reasons why. At any given time, there are more truck drivers out on the roads than there are law enforcement officers. There are over 3 million CDL holders in America, making them truly the eyes and ears of our nation's roadways. Moreover, they are trained to be vigilant, and along with truck stop employees, can often find themselves intersecting with victims in a myriad of places. That's why we created TAT, to educate, equip, empower, and mobilize the United States trucking industry to combat human trafficking as part of their regular jobs.

We have three main goals. The first is to saturate the trucking and related industries with our training materials, which are free of charge, readily available, and industry-specific. To date, over 424,400 trucking industry members have been registered on our website as TAT trained. All 50 state trucking associations have now partnered with us, as well as the vast majority of the national associations.

Our second goal is to partner with law enforcement and government agencies to facilitate the investigation of human trafficking. We work continuously to bring together trucking industry members with their local law enforcement and state agencies in an effort to

close loopholes to traffickers. One of the ways we do this is through our coalition builds program, which are designed to establish an effective and sustainable working relationship between trucking and law enforcement statewide.

We have held 29 coalition builds in 20 states across the Nation, partnering with 11 Attorneys General offices, as well as Homeland Security investigations, FBI, state police, and local law enforcement agencies. As a result, thousands in the trucking industry and hundreds of law enforcement officers have been trained on human trafficking.

Thirty-one states have now adopted TAT's Iowa Motor Vehicle Enforcement model, in part or in whole. This model allows TAT to utilize the pre-existing overlap between commercial vehicle enforcement units and the trucking industry through weigh stations, ports of entry, interdiction stops, and mandatory safety compliance meetings within trucking companies.

And our third goal is to marshal the resources of our partners to combat this crime. This is why in 2014, we created our Freedom Drivers Project, which is a 48-foot-long custom show trailer outfitted with actual artifacts from human trafficking cases as well as the stories of the real Truckers Against Trafficking and the many companies behind them that are out there on the frontlines every day across our Nation.

In addition, TAT will be launching a demand campaign centered around the connection between purchasing commercial sex and sex trafficking, as it is imperative that buyers of commercial sex understand that they are driving this market. It is our hope that the professional drivers at the forefront of this campaign will create inspiration for more of these conversations to occur.

And the great news is these programs have been working. According to the National Hotline, truckers have now made over 1,836 calls identifying 525 likely human trafficking cases involving 972 victims, 315 of which are minors. And that's just one slice of the data pie, as we know that many drivers still contact 911 or their local sheriff's office.

It is my great honor to appear in this important hearing. And TAT hopes to be a continued advocate and partner with all of those in attendance. It truly is going to take all of us. We must continue to turn critical populations who were once passive about this crime into a disruptive force. That is why TAT has taken steps to replicate its model across borders, across industry sectors, and across modes of transportation.

We applaud the members of this Committee for the good work they are doing to strengthen laws that protect the vulnerable and exploited and see to it that their traffickers and those who purchase them are prosecuted to the full extent of the law.

We also want to applaud the United States trucking industry, who serves as a model for what is possible when people know and care what is really going on, people who are willing to take that second look and be change-makers right where they're at.

In closing, I would like to use the words of professional truck-driver and everyday hero Kevin Kimmel, who said, "We need to get back to a place where if somebody is in need, we step up to help.

There are a lot of things in life that aren't obvious, but this isn't one of them."

Thank you.

[The prepared statement of Ms. Goetsch follows:]

PREPARED STATEMENT OF ESTHER GOETSCH, COALITION BUILD SPECIALIST,
TRUCKERS AGAINST TRAFFICKING

On behalf of Truckers Against Trafficking (TAT), I'd like to thank Chairman Thune, Ranking Senator Nelson, and the distinguished members of the committee for inviting us to take part in this informational hearing. We applaud the committee's efforts to bring attention to the horrific crime of human trafficking, and recognize that it is going to take all of us . . . legislators, survivor-leaders, non-profits, law enforcement officers, industry members, state agencies, and the general public . . . doing our part to truly assist victims, as well as prevent future ones.

On January 6, 2015, an RV pulled into a truck stop in Virginia. Police were soon called to the scene. When they arrived, and after interviewing the occupants of the vehicle, the horrific story made headlines. A young woman, 20 years old, had been kidnapped two weeks prior out of Iowa. She had been beaten, raped, her whole body burned by instruments heated on the RV stove, branded and starved. She was being sold by her traffickers, Laura Sorenson and Aldair Hodza, through sex ads on Craigslist, where men were purchasing her and then arriving at the RV to rape her. She was dying from malnutrition and the torture she was subjected to . . . had the call not been made that brought law enforcement out to that truck stop, doctors said she would have died within the next few days. That call was made by Florida-based, professional truck driver Kevin Kimmel, who recognized that something was off—something was wrong—and instead of turning a blind eye, he picked up the phone. She calls him her guardian angel. He calls himself a Trucker Against Trafficking.

People ask us, why truckers? And there are actually quite a number of reasons why. At any given time, there are more truck drivers out on the road than there are law enforcement officers. There are over 3 million CDL holders in America and they truly are the eyes and ears of our Nation's highways. Moreover, they are trained to be vigilant, and along with truck stop employees, can find themselves intersecting with victims of human trafficking in a myriad of places. That's why we began TAT . . . to educate, equip, empower and mobilize the United States trucking industry to combat human trafficking as part of their regular jobs.

We have three main goals. The first is to saturate trucking and related industries with training materials which are free-of-charge, readily available and industry-specific. To date, over 329,800 trucking industry members have been registered as TAT Trained on our website. All 50 state trucking associations have now partnered with TAT, as well as the vast majority of national trucking associations.

Some of our partners include the American Trucking Associations, the Truckload Carriers Association, the Owner Operator Independent Drivers Association and the National Association of Truck Stop Operators.

Our second goal is to partner with law enforcement and government agencies to facilitate the investigation of human trafficking. We work continuously to bring together trucking industry members with their local law enforcement and state agencies in an effort to close loopholes to traffickers. One of the ways we do this is through our coalition build program which is designed to establish an effective and sustainable working relationship between the trucking industry and law enforcement statewide, in order to combat the crime of human trafficking. TAT has held 29 coalition builds in 20 states across the nation, partnering with 11 Attorney's General offices, as well as Homeland Security Investigations, FBI, state police and local law enforcement agencies. As a result of these meetings, thousands in the trucking industry and hundreds of law enforcement officers have been trained on human trafficking.

Thirty-one states have now adopted TAT's Iowa Motor Vehicle Enforcement model, in part or in whole. This model allows TAT to utilize the pre-existing overlap between commercial vehicle enforcement units and the trucking industry through ports of entry, weigh stations, interdiction stops and mandatory safety compliance meetings within trucking companies.

This model also allows TAT to activate often overlooked state agencies in combating human trafficking, insofar as the Department of Transportation, Department of Motor Vehicles, Department of Revenue, Department of Licensing and Department of Public Safety now have specific pathways to help equip and educate an industry on the front lines of combating human trafficking.

Our third goal is to marshal the resources of our partners to combat this crime. This is why in 2014, we created the Freedom Drivers Project, a 48'-long custom show trailer outfitted with actual artifacts from human trafficking cases, as well as the stories of the real Truckers Against Trafficking, and the many companies who are on the front lines everyday combating this crime across our Nation.

The FDP has already completed 88 events in 28 states, traveling over 89,900 miles, with 20,700 people walking through its doors, making it a very innovative and effective tool in educating critical stakeholders, and rallying members of the media and the general public to this cause.

Moreover, with the help of the American Trucking Associations Road Team Captains, as well as Walmart, CFI Industries, and additional trucking companies, industry ambassadors have begun to train rotary members, their local churches and schools, as well as each other on the realities of human trafficking and how to report it effectively. In addition, TAT will be launching a demand campaign centered around the connection between purchasing commercial sex and sex trafficking, as it is imperative that buyers of commercial sex understand that they are driving this market. It is our hope that the professional drivers at the forefront of this campaign will create inspiration for more of these conversations to occur.

And the great news is, these programs are working. According to the National Human Trafficking Hotline, truckers have now made 1,836 calls, reporting 525 cases of potential human trafficking identifying 972 victims, with 315 of those being minors.

And that's only one slice of the data pie, as we know that many drivers still contact 911 or their local sheriff's office to report this crime. To that end, TAT conducted its own survey in 2016 and found that out of the 1,500 truck drivers and truck stop employees who responded, that an additional 521 victims of sex trafficking were identified, with the vast majority of these cases being reported via 911 or to their local sheriff.

If every driver and truck stop employee had this life-saving information and training, imagine how many more calls will be made, imagine how many victims will be recovered out of this horrible reality, how many perpetrators—both the traffickers AND the buyers of commercial sex—will be arrested.

It is my great honor to appear in this important hearing, and TAT hopes to be a continued advocate and partner with all of those in attendance today to combat human trafficking. It truly is going to take all of us. We must continue to turn critical populations who were once passive about this crime into a disruptive force. This is why TAT has taken steps to replicate its model across borders, across industry sectors, and across modes of transportation. We applaud the members of this committee for the good work they are doing to strengthen laws that protect the vulnerable and exploited, and see to it that their traffickers, and those who purchase them, are prosecuted to the fullest extent of the law. We also applaud the United States trucking industry who serves as a model for what is possible when people know and care about what is really going on out there. People who are willing to take a second look and become change-makers right where they're at. In the words of professional driver and everyday hero Kevin Kimmel, "We need to get back to a place where if there's somebody in need, we step up to help. There are a lot of things in life that aren't obvious, but this isn't one of them."

The CHAIRMAN. Thank you, Ms. Goetsch.
Mr. Goswami.

**STATEMENT OF SAMIR GOSWAMI, TECHNICAL CONSULTANT,
TECHNOLOGY SOLUTIONS TO TRAFFICKING IN GLOBAL
SUPPLY CHAINS, ISSARA INSTITUTE**

Mr. GOSWAMI. Chairman Thune, Ranking Member Nelson, and members of the Committee, thank you for inviting the Issara Institute to discuss human trafficking and working conditions in the seafood industry in Southeast Asia. We are grateful that this body is exploring ways that it can assist the hundreds of thousands of victims of forced labor and human trafficking who are exploited every day in the process of satiating a global appetite for seafood.

I'm an advisor to the Issara Institute, an independent U.S. non-profit based in Southeast Asia tackling the issues of human trafficking and slavery through technology, partnerships, and innova-

tion. Today, I will highlight some of the pervasive challenges faced in Thailand's seafood industry and the solutions that we deploy in partnership with the private sector, including many U.S. retailers.

The great majority of the estimated 4 million migrant workers in Thailand, many of whom are working in factories or farms making products that are exported to the United States, are from the poor neighboring countries of Myanmar, Cambodia, and Laos. Among these workers are an estimated 500,000 victims of trafficking and forced labor that remain unidentified and unassisted, especially in high-risk fishing and the seafood industry. We have found that debt bondage, illegally low pay, and excessive working hours are experienced by over 75 percent of the migrant workforce.

The Thailand seafood industry has an annual worth of approximately \$7.3 billion, exporting roughly 500,000 tons of shrimp alone, an estimated 40 percent of which comes to the United States. Additionally, "trash fish," about a third of all fish caught in sea, is processed into feed for shrimp, fish, and poultry, farmed for export to American supermarkets. A huge challenge to concerned U.S. retailers and brands has been knowing exactly which of the thousands of farms and plants and fishing boats across Asia are in their supply chain.

The first-tier processing plants selling the products that end up in our grocery shelves are well known, however, the deep supply chains behind them generally are not, even though the California Transparency in Supply Chains Act encourages businesses to disclose efforts to eradicate human trafficking from across their supply chain, and even the U.S. Tariff Act prohibits the importation of goods made by forced and child labor. This puts U.S. supply chains and consumers at great risk.

To quote Detective Chief Phil Brewer, the head of Scotland Yard's anti-slavery police unit, "Everyone realizes now we're never going to police our way out of this." This is our conclusion in Asia as well. The hundreds of thousands of victims and exploitative brokers, agents, and employers cannot possibly all end up in shelters or behind bars. It simply might not be possible to help all the victims and prosecute all the criminals solely with a criminal justice-based approach.

There are other ways to tackle trafficking supply chains. Exploitative labor conditions can and should be transformed into decent working conditions through supply chain leverage. We are developing new models of collaboration between other U.S. NGO and leading American brands and retailers with the support of key donors, including the U.S. Agency for International Development and the U.S. State Department's Office to Monitor and Combat Human Trafficking. Together, we are using partnerships with business, data and technology, and on-the-ground solutions to identify labor risks and root out illicit practices in the production of products that reach the U.S.

For example, since most migrant workers in Thailand own and use smartphones, we run a 24-hour helpline in four languages, and social media and chat applications that leverage smartphone-based communication channels that workers already use. With the support from USAID and the Walmart Foundation, we have developed a Yelp-like app in Burmese that allows workers to rate, review,

and comment on their employers and recruitment agencies. These multiple technology-enabled channels generate data, providing Issara with a constant pulse on labor situations across many multi-tiered supply chains.

Issara is currently partnering with about 14 leading global brands, retailers, supermarkets, and restaurant chains to identify and eliminate risks of trafficking and forced labor in their Thai supply chains. These business partners share their supplier data confidentially with us, and we work directly with those suppliers to identify labor risks and provide solutions.

We find forced labor and human trafficking where most audits and government inspections do not because their systems are not designed to collect information directly from workers. They mostly rely on what employers tell them, which can be a rosier story than what the truth is. Our data channels enable government—multi-national businesses to get a direct view of labor conditions across their supply chains no matter how complex.

However, it takes more than just data and technology. Staff have to be on the ground to constantly validate incoming data and to help push suppliers to respond to it. In Southeast Asia, suppliers receive free technical advice from Issara to address urgent labor issues. If they fail to respond to validated findings, they risk being cut out from our partner companies' supply chain. Together, we make sure all workers have their passports in hand, are not debt-bonded, have legal contracts, are paid legally, and pay back remediation if needed. We also promote decent living conditions and safe access to grievance mechanisms without fear of reprisal.

Responsive suppliers get to stay linked with U.S. key supply chains and distinguish themselves by having greater transparency and superior ethical sourcing through independent worker voice and worker data-centered systems.

In conclusion, in the past year, the Issara model has directly and positively impacted the lives and working conditions of over 600,000 migrant workers. Over 5,000 were once in forced labor conditions and are now in decent work being paid fairly.

Most American brands should fully incorporate credible, effective due diligence and remediation systems into core sourcing functions. It's a better and more efficient way to do business, and it's a more American way to do business, given our longstanding moral commitments to ending human trafficking and slavery.

Thank you very much.

[The prepared statement of Mr. Goswami follows:]

PREPARED STATEMENT OF SAMIR GOSWAMI, TECHNICAL CONSULTANT, TECHNOLOGY SOLUTIONS TO TRAFFICKING IN GLOBAL SUPPLY CHAINS, ISSARA INSTITUTE

Introduction

Chairman Thune, Ranking Member Nelson, and Members of the Committee, thank you for inviting the Issara Institute to be here today to discuss human trafficking and working conditions in the seafood industry in Southeast Asia, and exciting emerging models for identifying and eliminating forced labor and human trafficking in global supply chains.

The International Labor Organization reports there are more than 20 million people in forced labor today—about double the number in bondage during the transatlantic slave trade. Human trafficking is as much a moral issue as an economic one—pervasive in Thailand's seafood sector, an issue that I will speak to today. We are grateful that this body, with its oversight of shipping, transportation security,

merchant marine, the Coast Guard, oceans and fisheries, is exploring ways that it can assist the hundreds of thousands of victims of forced labor and human trafficking who are exploited daily in the process of satiating a global appetite for seafood.

I am an advisor to the Issara Institute, an independent U.S. 501(c)(3) not-for-profit corporation based in Southeast Asia tackling issues of human trafficking and forced labor through technology, partnerships, and innovation. The Institute was established in 2014 by a team of anti-trafficking experts coming out of the United Nations who created an alliance of private sector, civil society, and government partners to address labor issues in global supply chains. Today, I will highlight some of the pervasive challenges that we observe in Thailand's fishing industry, and the solutions that we deploy, often in close partnership with the private sector, including leading U.S. retailers.

Traffickers often exploit the economic and social vulnerability of those migrating within Southeast Asia, looking for better economic opportunity. For example, the great majority of the estimated 4 million migrant workers in Thailand—many of whom are working in factories or farms making products that are sent to the United States and Europe—are from the poorer neighboring countries of Myanmar, Cambodia, and Laos. Our experience and research strongly suggests that the scale of the forced labor issue has proven to be simply too large for government and criminal justice-oriented approaches alone to drive down. Hundreds of thousands of victims of trafficking and forced labor remain unidentified and unassisted annually, and extremely high rates of labor abuse plague high-risk industries such as fishing—3 out of 4 fishermen on Thai vessels are debt-bonded, for example.

Certainly, more can be done by the destination-side governments in Asia to vigorously enforce local laws and international protocols to punish traffickers and protect the rights of exploited and trafficked migrant workers. However, I am here today to discuss some of the most promising and exciting emerging models to eliminate forced labor and human trafficking in global supply chains, including multi-tiered and complex supply chains such as shrimp. These new emerging models center on partnership with American and European brands and retailers to fix the broken business systems—that is, primarily, migrant labor recruitment and management—within global supply chains that have allowed such high rates of forced labor and debt bondage to persist. These models have developed on the other side of the world, through collaboration between our American NGO and leading American (and now also European) brands and retailers, and with the support of key donors including the U.S. Agency for International Development and the U.S. State Department Office to Monitor and Combat Human Trafficking. Together, we are using *partnerships with business, data and technology, and on-the-ground solutions* to empower worker voices, identify risks and root out illicit practices in supply chains leading to the U.S. We also encourage local suppliers to reform their systems, and create fair and just worker recruitment and workplace experiences for hundreds of thousands.

The Scale and Severity of the Trafficking Problem in the Fishing Industry

According to the *World Wildlife Fund*, more than 85 percent of the world's fish stocks are at risk of illegal, unreported and unregulated fishing. While much attention is paid to over fishing, traceability, depleted fish stocks, and unhealthy toxins that contaminate the seafood we consume, there is increased awareness of the labor exploitation that is also endemic in the industry.

Thailand's seafood industry has an annual worth of approximately *\$7.3 billion* exporting roughly 500,000 tons of shrimp alone, an estimated *40 percent* of which are to the United States. The Thai government estimates that up to *300,000 people work* in its fishing industry, the great majority of whom are foreign migrant workers. The United Nations estimates that the industry faces a shortage of about 50,000 workers every year, which is often filled by illicit recruiters who use deceptive practices to enlist desperate migrant job seekers from Myanmar, Cambodia, or Laos, or even employ force and coercion to traffic migrants to work in the industry. Migrant workers' vulnerability at the fisheries level is exacerbated by informal bans imposed by the Myanmar and Cambodian governments, which prohibit recruitment of their citizens on to Thai fishing vessels through formal channels. This means that, with the labor recruitment systems currently set up by the source and destination governments, there is currently no formal, regulated channel through which migrants can be recruited and placed into the Thai fisheries.

About 90 percent of the seafood consumed in American households is imported; and, "forage fish" or "trash fish", about a third of all fish caught at sea, ends up being made into feed for shrimp, aquaculture, poultry, and other animals farmed and raised for export into American supermarkets. This puts us at risk of inadvertently supporting illegal and often unconscionable practices. The shortage of workers

and the high prevalence of debt-bonded fishermen (76 percent, according to the Institute's latest prevalence estimates), along with a high demand from the U.S. and Europe for inexpensive seafood products, drives the need for cheap labor that is met by exploitative and often unregulated and illicit labor practices. Thus, the exploitation of those employed in Thailand's seafood industry, both on-shore and on Thai fishing vessels fishing in Thai waters and beyond, to the coasts of Indonesia, Australia, and Africa, has global implications.

Issara Institute's research and ongoing fieldwork in the factories, ports, and piers of Thailand's seafood industry clearly demonstrates that labor abuses on Thai fishing vessels is systemic. Rates of debt bondage, illegally low pay, and illegally excessive working hours are found in over 75 percent of the commercial fishing migrant workforce. This includes vessels going out to sea for just days or a couple weeks, in addition to those more famously known for being out at sea for months or years at a time. Working conditions are intense and hazardous and tightly controlled by boat captains and net supervisors, both when vessels are at sea and when they are at port, where the men often have very little freedom of movement and are made to mend nets and perform other tasks. Labor risks are highest by far on trawlers as compared with purse seiners, squid boats, or long-liners. Trawlers catch the low-value "trash fish" that is made into animal feed, as well as anything and everything else that gets trapped in the trawling nets that are dragged along the ocean's surface for hours at a time.

Conditions on-shore are far from perfect but generally better than at sea. Obviously, factories and farms are easier to inspect and regulate than fishing vessels—not only by government inspectors, but also by auditors and representatives of concerned retailers, restaurants, supermarkets and the food service industry. The main challenge to concerned retailers and brands has been knowing exactly which of the thousands of farms, feed mills, and fishmeal plants across Thailand and Southeast Asia are in their supply chain. The first-tier processing plants from which they purchase the products that end up on our grocery shelves are well known, but the deep supply chains behind them generally are not—even though the California Transparency in Supply Chains Act mandates that businesses make efforts to eradicate human trafficking from across entire supply chains and not just the first tier.

Take for example the case of Maung Nge, a young, orphaned Burmese boy who, after losing both his parents, migrated to Thailand at the encouragement of a family friend. At age eleven, Maung Nge started work on a Thai long-haul fishing vessel that travelled into Indonesian and Malaysian waters, spending over a year out at sea, only returning to shore when the boat broke down. He spent the next six years working on different fishing vessels, all as a child. One day he was arrested by Thai police who exploited his lack of documentation and demanded a bribe of 4,000 Thai Baht (\$114) in order to be released. When he could not pay, he was beaten and 'sold' by the police to a broker, who demanded he work on a fishing boat to pay off his debts. This broker took all of Maung Nge's earnings, and for the next 15 years, he was forced to work 16–20 hour days on a fishing boat to pay back his debts. Maung Nge was beaten frequently, witnessed the torture and murder of his fellow fishermen, was threatened at gun point, and was forced to take illicit amphetamines to stay awake and work harder.

Sadly, Maung Nge's experience is not uncommon, as demonstrated not only by Institute research but also verified by a recent *New York Times* investigation. They found that fishermen on Thai boats worked 18 to 20 hours in over 100 degrees in the summer. Their Thai fishing boat captains had paid a "fee per head" to smugglers and traffickers which trapped migrants in a system of debt bondage, working years to pay off an artificial and often illegal debt, enduring much suffering along the way.

The experiences of Maung Nge are illustrative of the exploitation that recruiters, traffickers, boat captains and corrupt police officials perpetrate, establishing a system of collusion that leaves workers, especially migrants, with very few options and access to remedy. From Issara's extensive fieldwork, casework, and research, it is clear that illegal overwork, underpay, and debt bondage—key elements of human trafficking—are widespread in Thailand. Make no mistake, this is a system of indentured servitude being practiced today with local victims and global ramifications. Yet, according to the recently released Trafficking in Persons Report by the U.S. State Department, despite the prevalence of forced labor in Thailand, the government reported that it only conducted a woefully small 83 investigations and 62 prosecutions involving suspected cases of forced labor. A seemingly minuscule number compared to the scale of exploitation that has been documented.

Impact on American Consumers

While exploited, debt-bonded, and trafficked migrant workers toil in Thai fishing vessels and processing facilities, the product reaches American restaurants, kitchen tables and the cafeterias of military and civilian facilities. Americans consume *1.3 billion pounds of shrimp* per year, about 4 pounds per person—much of which is impacted by forced labor or other forms of exploitation in its harvesting or processing. Undoubtedly we all agree that this defies our values, however, an *Associated Press investigation* revealed that supermarkets in all 50 states sold shrimp products from supply chains tainted with forced labor. Such shrimp was found by the AP in the products of 40 U.S. brands, in more than 150 grocery stores across urban and rural America—exposing millions of American consumers.

Groundbreaking Solutions Through Partnership, Data and Technology, and Innovation

Last Saturday, on July 8 2017, the head of Scotland Yard’s anti-slavery police unit, Detective Chief Inspector Phil Brewer, stated to media about forced labor and human trafficking that “Everyone realizes now we’re never going to police our way out of this.” This is certainly the conclusion we have come to in Asia as well. With millions of victims and thousands if not millions of exploitative brokers, agents, employers, and other criminal elements, what is the vision—that the millions of victims are identified and put in shelters, and the perpetrators are all put in prisons? If all victims cannot be assisted, what fraction do we aspire to help, and who gets prioritized and deprioritized—if we can even imagine having to make such decisions, which are actually being made every day? How many dedicated law enforcement officers, social workers, and prison and shelter beds would be required for this kind of justice?

When we can see how the slavery in Asian supply chains touches us in America, it is fair and high time for us to be involved in creating the vision for the solution. This, at least, was the attitude of Walmart and nine UK retailers and seafood importers in 2014, when the newly established Issara Institute formed the first pilot partnerships to end slavery in seafood supply chains. Issara’s system is basically one where we incentivize and enable multinational businesses to get a direct view of labor conditions across their supply chain, no matter how complex; pressure local suppliers to either eliminate their labor risks and abuses or get cut from the supply chain; and, offer technical assistance to progressive suppliers to fix broken labor recruitment and management systems. That is, make sure all workers have their passports in hand, are not debt-bonded, have legal contracts, are paid legally, have decent living conditions, safe access to grievance mechanisms without fear of reprisal, and so on—from the biggest processing plants to the smallest piers. Just in the past year our model has directly and positively impacted the lives and working conditions of over 60,000 migrant workers, over 5,000 of whom were in forced labor conditions and who are now in decent work—being paid fairly and with freedom of movement, with no shelters, no separation from families or other ethical dilemmas, and no protracted and corrupted court cases. And we did it all on a budget of approximately \$1 million, coming from a combination of development donors and corporate partners. No other anti-trafficking NGO response has been able to achieve this level of effectiveness or efficiency in eliminating forced labor, perhaps because we have been able to get to the root of the broken business systems that create and perpetuate forced labor, and force change through supply chain leverage. The three key elements of the model are *partnership with business, data and technology, and on-the-ground solutions*: Taking a collaborative and science-driven approach but also an on-the-ground, within-supply chains-based methodology that draws upon the leverage that multinational brands have to drive improvements in their supply chains.

Technology Innovation for Human Rights and Business Due Diligence: Worker Voice

In Southeast Asia, the majority of migrant workers own and use smartphones. Over 90 percent of the estimated nearly 4 million Burmese migrant workers in Thailand own smartphones with data packages. Mobile phone usage is similarly saturated in Cambodian and Lao populations in Thailand. This mobile penetration has greatly enhanced Issara’s ability to reach out to and listen to workers to ensure that their actual experiences inform the solutions that we deploy with our brand partners.

Issara Institute runs a 24-hour helpline in four languages, and utilizes social media and chat applications like Line, Viber and Facebook that leverage smartphone-based communication and social media channels that workers already use. Through these multiple technology-enabled channels, in 2016 over 60,000 work-

ers were linked to Issara, communicating with our staff in their own language and enabling us to have a constant pulse on the voice of thousands of workers across multi-tiered supply chains. These multiple channels enable us to successfully access remote and hard-to-reach populations, including migrant workers at sea. We aggregate the data collected from these various sources to uncover risks in complex supply chain operations—pinpointing specific exploitative actors.

With support from USAID and Walmart Foundation, Issara has also recently launched the *Golden Dreams* Burmese-language smartphone app, a Yelp-like platform for Burmese current and prospective migrants to learn and exchange information, reviews, ratings, comments, and advice about employers, recruiters, and service providers, in both home and destination countries.

While technology provides unprecedented insight, it complements and does not replace on the ground action. Thus, Issara field teams establish rapport with workers and communities to ensure that we are addressing their stated needs and priorities. Online and offline, continuous communication with workers builds relationships and trust, enabling better data collection. The information and feedback is then turned into action: It directly shapes the interventions and improvements made by the hundreds of suppliers of the 14 brands we partner with and support.

Partnership with Business & Solutions through Inclusive Labor Monitoring

Issara is currently partnering with 14 leading brands, retailers, and importers, including Nestle, Walmart, Mars, Red Lobster, Tesco, Marks and Spencer, Sainsbury's and Waitrose, to identify and address risks of trafficking and forced labor in their Thailand export-oriented supply chains. We do this through a new approach we call Inclusive Labor Monitoring, whereby business partners share their confidential supply chain data, and our team on the ground works directly with their suppliers (all tiers) to identify labor risks and support solutions that are “owned” by the supplier. The approach is inclusive because all workers have the opportunity to individually share information in-confidence at their own time and location of choosing, and receive assistance and support via Issara’s multiple worker voice channels.

Issara builds trust with workers by engaging with them at the factory, in the community, and sometimes pre-departure in their home countries before migrating, and provides meaningful and timely information to help them navigate their journey. Trust is key because it underpins successful worker voice systems, and provides the concrete details for business and suppliers to understand what is happening in their factory and to take action. This is particularly important when it is a foreign migrant workforce that does not speak the same language as the supplier’s human resources and management staff, as in the case of Thailand. Lack of trust is why social audits, where an auditor visits a factory for a few hours or days, or internal supplier grievance mechanisms or government-run hotlines are not always successful at exposing many of the complex and hidden issues related to forced labor, debt bondage, and trafficking in persons.

Once worker voice information comes to Issara, we validate the data and then provide the supplier with the anonymized feedback for action. Corrective and preventive actions are developed in collaboration with Thai suppliers when labor issues are found. Suppliers have been supportive of this approach because Issara Inclusive Labor Monitoring is of no cost to them; they receive reliable business intelligence about what is happening in their workplace and workforce; there is free technical advice from Issara to help address issues; and, findings are kept confidential. But the suppliers are also held accountable to implement reforms since the brands and retail partners receive reports of issues in their supply chain, as well as the actions and progress suppliers are taking to address them.

The end result is an integrated model where both workers and business see benefits, and there is impact to address trafficking in persons at scale. Having started out as a pilot in 2014, the Issara Inclusive Labor Monitoring approach has already made fundamental changes to exploitative working conditions for over 60,000 workers last year, with over 5,000 of those directly helped out of situations of trafficking or forced labor.

Conclusion: Scaling Solutions and Driving Change through Global Supply Chains

Technology has greatly increased our ability to uncover once-hidden exploitation and hear directly from victims by the thousands. Importantly, it is their experiences that can now inform interventions and solutions. Too often we gravitate to the most horrendous stories of exploitation and violence and develop extreme responses such as raid, rescue, and forced shelter that often do harm and impinge on the fundamental rights and dignities of workers. It is time to simply change the system—to

transform workplaces—and transform exploitative labor conditions into decent working conditions through supply chain leverage and technical assistance.

Most labor exploitation occurs in places like Southeast Asia not because of thousands of “bad guys,” but because of decades’ absent industry regulation or enforcement of basic labor standards such as giving workers contracts, pay slips, discrimination-free environments, and the right to voluntarily accept or decline overtime. Issara has extensive experience working with Thai suppliers of seafood and agricultural products to the United States. When suppliers are offered model contracts, pay slips, and other tools that are multi-lingual and designed in compliance with relevant laws and buyer standards, and trained on how to manage workers, their documents, and so on, these businesses often readily adopt these tools and new approaches, and change their systems to be more compliant with the law and buyer codes of conduct. These businesses are not running highly informal, substandard systems for the purpose of being horrible greedy people, but rather because it’s the way business has been done for decades absent effective government regulation. And if they were audited, especially beyond the first tier, it was not likely on social issues or with independent feedback mechanisms, like a worker helpline, in place where these issues would come to light. The good news is that in our experience once these businesses adopt new systems, policies, and approaches to recruiting and managing workers, and build their institutional capacity, they are extremely unlikely to backpedal back into not using contracts and pay slips, or not using systems they themselves created (with our assistance). There is no incentive to actively break down what has been built up, and in fact there is incentive from their global customers to maintain their higher standards.

So, how to foster this positive behavior from global customers—such as American retailers and supermarkets—to incentivize their suppliers in global supply chains to adopt less exploitative systems? How do they open themselves up to collaboration with NGOs that can help them build and reform their systems to drive trafficking risk out of these supply chains that touch American customers? Government can play, and has played, a key role in incentivizing and stimulating such adoption. The California Supply Chain Transparency Act and UK Modern Slavery Act have compelled many companies to investigate and disclose their own diligence processes and procedures. USAID’s Supply Unchained Initiative and U.S. State Department funding to organizations with boots on the ground and science and technology capacity such as Issara Institute has enabled the development of the tools and innovation needed to actually root out and crowd out exploitative labor practices.

What else needs to be done to capitalize on these recent advancements and successes? Only a few multinational companies who face these supply chain risks have adopted such solutions at an enterprise level. Despite increasing regulatory frameworks and fears of reputational risks, conducting systematic due diligence for human trafficking does not appear to have become part of standard operating procedure for many brands and is often relegated to separate, limited corporate responsibility or ethical sourcing departments. Brands and retailers need to fully incorporate credible and effective diligence for human trafficking and forced labor into core sourcing functions, and invest in the optimal products and partnerships for their business needs. Knowing and mapping your supply chain, and conducting due diligence—preferably utilizing worker voice mechanisms as a more effective means to generate primary data and business intelligence—will help identify the solution areas that need to be focused. New technology tools and migrant worker access to smart phones is unlocking opportunities to identify trafficking and forced labor risks, and to interact with workers, in ways that were simply were not possible just a few years ago. American business investment in supply chain improvement, and seeking (and rewarding) suppliers that are open to change and workplace transparency, will spur further innovations, drive down costs, enable expanded data collection and sharing, and fuel scaling. Most importantly, U.S. brand investments and commitments can ensure that workers’ rights are protected and violations prevented, and that long term responsible sourcing practices are advancing to drive solutions and change through global supply chains.

Further support is also needed to the refinement and expansion of technology to connect and empower vulnerable workers, giving voice to their experiences and providing data-informed insights to corporations and suppliers about labor conditions across complex, multi-tiered supply chains. Boots on the ground with multilingual and multi-cultural labor expertise are also vital to verify and validate labor risks and abuses. This local expertise can help supplier businesses transform their contracts, labor recruitment systems, and labor conditions, and report to global buyers where risks are and are not being eliminated, to bring on the supply chain leverage that so strongly motivates positive change. While Issara has scaled rapidly, and continues to experiment and learn, we have benefited greatly from the assistance of the

U.S. Agency for International Development and the State Department's Trafficking in Persons Office, which has enabled us to innovate and expand the reach of our technology and our partnerships to support American retailers and supermarkets. We hope the U.S. Government will continue to use all of the tools at its disposal to foster commercial environments that safeguard worker's rights and prevent their exploitation.

Thank you.

The CHAIRMAN. Thank you, Mr. Goswami.
Mr. Lares.

**STATEMENT OF TOMAS J. LARES, EXECUTIVE DIRECTOR,
FLORIDA ABOLITIONIST; AND CHAIRMAN, GREATER
ORLANDO HUMAN TRAFFICKING TASK FORCE**

Mr. LARES. Good morning. My name is Tomas Lares. I am the Executive Director of Florida Abolitionist and also the Chairman of the Greater Orlando Human Trafficking Task Force.

I would like just to highlight in my brief comments today the power of collaboration at the grassroots, including some of the board members that are a part of my nonprofit, including Dr. Richard Lapchick, who is a civil rights pioneer and champion in our country; Commissioner Pete Clarke, from Orange County Government; Commissioner Tony Ortiz, from the City of Orlando; Judge Wilfredo Martinez, from our Orange County courts; Dick Batchelor, a Florida welfare—another champion and advocate in our state and former legislature; and most of all I want to highlight the importance of having survivor advocates at the table of every conversation. Amy Smith is one of those on our board.

On behalf of Florida Abolitionist, I want to give a special thanks to Chairman John Thune, Ranking Senator Bill Nelson, from my state, and all the members of the Committee for the invitation to this informational hearing.

Unfortunately, the horrific crime of human trafficking, also known as modern-day slavery, is evident in each of our communities. Only through the partnership and collaboration of governmental and non-governmental organizations, faith communities, and the private sector can we adequately and efficiently address this issue.

It was 13 years ago this week that former U.S. Senator Sam Brownback of Kansas introduced me to the issue of human trafficking while presenting to his staff the "Trafficking In Persons" report of 2004. Upon my return to Central Florida, I began to research what was occurring in my state pertaining to awareness, advocacy, prevention, prosecution, and who were the stakeholders in my backyard. You can imagine the level of awareness in 2004 was not too high.

What I discovered was that Florida had one of the first successful prosecutions, "The United States vs. Tecum". This was a historic case, and the survivor was the first recipient of the T-visa. Since then, dozens of cases of both sex, labor, and domestic servitude have been successfully prosecuted in our state.

Upon moving to Orlando, I was living in Central Florida. I was on the coast, and I moved to Orlando in 2006. I began to see the need for more collaboration, especially around the hospitality-tourism industry. As many of you know, Orlando is now the number one tourist place, destination, in the world.

As a victim advocate, I began to partner with our Orlando Metropolitan Bureau of Investigation, which is a very unique vice unit really in our country since 1978. Both Federal, state, and local law enforcement work together in narcotics, street crimes, and now human trafficking. We began to go out on stings and recoveries as the victims were identified. This was the beginning and creating of a 24/7 human trafficking hotline in our region that we now staff in key partnership with the National Human Trafficking Hotline and through the Polaris Project.

In 2009, we began aggressive awareness in our region. And I mention this because this is going to be key to why most of our hospitality and tourism industries have been educated in the greater Orlando. In the last 10 years, tens of thousands of citizens, businesses, and other groups have been educated. We have a monthly hotel outreach where we go to the hotels, a chain of hotels, and we train or present before their management and/or staff, depending on what the hotel is needing at the time. We have partnered with the Hotel and Lodging Association. And our mayor of Orange County, Mayor Teresa Jacobs, has committed to really addressing the issue of trafficking within our businesses in the county.

What has happened in Florida is evident by what Senator Nelson has mentioned with Florida being number three in the number of calls. Many of them are coming from Central Florida. And also for the new maltreatment code through our child welfare system, the Florida Department of Children and Families, where over 1,800 calls were made just last year.

In 2014, as a result of our collaboration, we relaunched our coalition as the Greater Orlando Human Trafficking Task Force. This Task Force has grown to dozens of members, subcommittees, working groups, and a multitude of community volunteers. This is the power of collaboration that makes our communities stronger, advocates for the most vulnerable, and works alongside our law enforcement and first responders.

At Florida Abolitionist, our mission is to end modern-day slavery. We accomplish our mission through networking and facilitating preventative and restorative solutions. We believe that awareness and education is vital to inform and equip students, parents, administrators, and teachers. We have partnered with our Orange County School Board, Superintendent Barbara Jenkins, and she has allowed us to come in the beginning of this year to train guidance counselors, psychologists, resource officers, social workers, and other frontline staff.

Our Seminole County, Osceola County, and other counties have now followed that same training, and this fall we'll be launching a major awareness campaign in our schools. And we have partnered with the schools already on what they have done with anti-bullying. It's called SpeakOut. And we've created a whole campaign for the students.

We believe that reaching this young generation is vital. And so we'll be launching later this year an app for our state to identify trafficking that will be user-friendly for the students. We know the Millennials are not calling the hotlines; they're not wanting to call anyone, as a matter of fact. So we believe this app is going to be very critical in reporting.

We are also committed to the restoration of victims and survivors, whether they are male, female, foreign-born, domestic, sex, or labor trafficking victims.

Throughout all these years of advocacy, I believe more than ever in the African proverb, "It takes a village to raise a child." This is also true if we're going to be abolitionists in the 21st century and stand together to fight this horrific crime.

Thank you.

[The prepared statement of Mr. Lares follows:]

PREPARED STATEMENT OF TOMAS J. LARES, EXECUTIVE DIRECTOR, FLORIDA ABOLITIONIST AND CHAIRMAN, GREATER ORLANDO HUMAN TRAFFICKING TASK FORCE

On behalf of Florida Abolitionist, Inc. (FA), a special thanks to Chairman John Thune, Ranking Senator Bill Nelson, and all the members of the committee for the invitation to this informational hearing. Unfortunately, the horrific crime of human trafficking also known as modern-day slavery is evident in each of our communities. Only through the partnerships and collaboration of governmental, non-governmental organizations, faith communities and the private sector can we adequately and efficiently address this issue.

It was 13 years ago this week that former U.S. Senator Sam Brownback of Kansas introduced me to the issue of human trafficking while presenting the Trafficking In Persons 2004 report to his staff. Upon my return to Central Florida I began to research what was occurring in my state pertaining to awareness, advocacy, prevention, prosecution and who were the stakeholders in my own backyard. What I discovered was that Florida had one of the first successful prosecutions, "The United States vs. Tecum". This was a historic case and the survivor was the first recipient of the T-visa in the United States. Since then dozens of cases of both sex, labor and domestic servitude have been successfully prosecuted in our state.

In 2005, I facilitated the first human trafficking seminar in Brevard County, FL. where over 100+ individuals and organizations attended. An outcome of this seminar was the formation of the Space Coast Human Trafficking Task Force. (Formerly the Space Coast Rescue & Restore Coalition).

Upon moving to Orlando in 2006 there was a need to begin organizing key stakeholders in the fight against human trafficking. As a victim advocate I partnered with the Orlando Metropolitan Bureau of Investigation and began specialized advocacy upon the recovery and/or identification of victims. This was the beginnings of creating a 24/7 human trafficking hotline that my agency staffs and the key partnership with the National Human Trafficking hotline through the Polaris Project.

In 2007, I cofounded the Orlando Rescue and Restore Coalition to network law enforcement, civic groups, service providers, educational entities and community/faith based agencies to work together to create a safety net and make preparations as victims are identified, rescued and restored in Greater Orlando region.

In January of 2009 a small group of abolitionists facilitated the first Human Trafficking Awareness march in downtown Orlando at the famous Lake Eola park. Preparations are being made to celebrate the 10th Annual Human Trafficking Awareness Day on January 27, 2018. Since that first march tens of thousands of Central Floridian's have been educated and made aware of the issue. This is evident by the number of calls documented by the National Human Trafficking hotline and the calls made to the Florida Department of Children and Families abuse hotline as well.

In 2014, as a result of our collaboration the Orlando Rescue and Restore Coalition was relaunched as the Greater Orlando Human Trafficking Task Force, Inc. whose mission is to provide human rights based, victim centered community forum and mechanism to combat all aspects of human trafficking in the Greater Orlando area through collaboration and partnerships with key stakeholders. The task force has grown to include dozens of members, subcommittees, working groups and a multitude of community volunteers. This is the power of collaboration that makes our community stronger, advocates for the most vulnerable and works along side our law enforcement and first responders.

At Florida Abolitionist, Inc. our mission is to end modern-day human slavery. We accomplish our mission by networking and facilitating preventative and restorative solutions. We believe that awareness and education is vital to inform and equip students, parents, administrators and teachers in our communities. We are also com-

mitted to the restoration of victims and/or survivors whether they are male, female, foreign born, domestic, sex or labor trafficking victims.

Throughout all these years of advocacy I believe more than ever the African proverb, "It takes a village to raise a child." This is also true if we are going to be true abolitionists in the 21st Century as we stand together declaring, "Not On Our Watch".

The CHAIRMAN. Thank you, Mr. Lares.

Ms. Goetsch, truckers are the eyes and ears of our nation's roadways and are well positioned to spot and help prevent human trafficking, as you noted. Can you tell us more about how truckers hear about your education program and how your relationship with industry contributes to the success of that program?

Ms. GOETSCH. Yes. So our program has been successful because of the industry's incredible response to the information. There were some leaders early on that really helped open doors to other stakeholders. So one of the largest travel and truck stops in America, Travel Centers of America, in 2011, came on as a partner.

We've also had other TAT champions that have really pushed our work forward in the industry. UPS just finished training 90,000 drivers and registering them as TAT trained. They, along with Walmart, have also donated to haul our Freedom Drivers Project all across the Nation, getting in front of more audiences within the industry. Ryder, one of the largest trucking companies, was an early partner of ours, and they serve on our board of directors as well, as well as Bridgestone, the tire manufacturer, who has opened doors in the industry that have been hugely helpful as well as financially supporting us.

The CHAIRMAN. As I understand it, and again hearkening back to some of your testimony, Truckers Against Trafficking has been successful in conducting outreach and education at the state level with more than half of the states adopting the group's proven model, including my home state of South Dakota.

Ms. GOETSCH. Mm-hmm.

The CHAIRMAN. So could you kind of describe how your group works with departments of transportation in states like mine?

Ms. GOETSCH. Yes. So it definitely is at the state level. So every state is different, and our inroads in each state have been different. So our IOWA MVE model is a model that any state can adopt primarily looking at those key locations, rest areas, weigh stations, and then working with highway patrol or state police within that state.

So we do work with Department of Transportation heavily. We train officers who run weigh stations and ports of entry on human trafficking so that they are also aware of the multiple indicators and the signs. We have worked Department of Licensing, Department of Public Safety. So whatever agency in the state can really have the right connections both with law enforcement and have that overlap with the trucking industry, that's where we come in and we present the program and then just continue with our partners to get the materials out on the ground level.

The CHAIRMAN. And the number of states participating today is how many?

Ms. GOETSCH. Thirty-one states.

The CHAIRMAN. Thirty-one states. OK. Good. And I assume you're trying to get all the others out there.

Ms. GOETSCH. Yes, that would be our goal.

The CHAIRMAN. All right. Well, hopefully, they'll follow through on that.

Mr. Goswami, the challenges that you've identified seem daunting. How has the development of technology made it easier for businesses to track the supply chains to reduce the risk of forced labor? And how can we better leverage technology moving forward to ensure that more businesses are better able to monitor their supply chains?

Mr. GOSWAMI. Yes, the challenges are quite daunting, and the victims and survivors are probably in the tens of thousands, if not hundreds of thousands, but technology has enabled us to get better insight and deeper insight into victims and survivors who often go unhidden.

For example, most of the migrant workers who are caught up in trafficking situations or other illegal situations in the Thai seafood industry, they happen to have smartphones or they happen to have Nokia feature phones, and there are many providers, including Issara, who have launched apps and other applications to survey such workers on their phones and ask them directly what their conditions are and provide that data directly to businesses who want to get that deeper insight into their workforces across their supply chains.

And what we find is that it's difficult to send people down everywhere to do audits announced or unannounced to go into every facility and check on a piece of paper what is happening and speak the local language. However, you can bypass that infrastructure by going directly to using mobile phones or other technologies to get directly to the workers. I should add, though, that even though we are sourcing good credible data from such tools, mobile tools, nothing replaces the on-the-ground work to take that data and turn it into positive solutions and work with suppliers to listen to the voices of the workers as they're telling us what changes they would like and what grievance mechanisms they need in implementing those measures.

The CHAIRMAN. Thank you. My time is up.

Senator Nelson.

Senator NELSON. Ms. Goetsch, how did an advertisement in Craigslist soliciting for sex not catch the eye of law enforcement?

Ms. GOETSCH. That's a good question. I'm not law enforcement, so I don't know that I can speak to that precisely, that individual case. I think law enforcement is working on tracking those kinds of sites more closely in order to identify. But the reality is—and both my colleagues here could speak to this as far as the sheer volume of ads that are typically out there and the high percentage of those that are trafficking situations.

I would just add that as I work with law enforcement across the United States, there does still need to be more training to help law enforcement identify what is a human trafficking case so that they can respond quickly and appropriately.

Senator NELSON. Well, when you train truckers, give me an example of what your training is like. What do you teach them?

Ms. GOETSCH. Yes. So we have a training video which has a survivor who was trafficked at a truck stop. She shares her story. We have a wallet card. That's the primary tool we use to educate and equip the trucking industry. So it has red flag indicators specific to the trucking industry and the truck stop and travel plaza industry. So looking for things that are abnormal. Truckers are already observant. They know the layout of their surroundings.

And so in that particular case, the RV was parked in an unusual spot. He watched. He noticed men coming back and forth from the RV. He noticed the curtains were blacked out. All of those things were indicators because he had been trained that this was not a normal family situation.

You know, if there are minors traveling with someone that they don't look related to. Maybe they're not answering for themselves or in control of their own documents. So there are a lot of indicators that we train truckers to be on the lookout for.

Senator NELSON. Right.

Mr. Lares, you were telling how you all have very successfully reached out to the school system in Orange County. What degree of success have you had reaching out to the business community in Florida to get them willing to participate?

Mr. LARES. Well, Senator, particularly in Central Florida, it has been a little challenging because we are the tourist destination that a lot of businesses do not want the image of being—having trafficking associated. And so we have had to really be just very strategic in how we approach the businesses. And that's where I was mentioning Mayor Teresa Jacobs, Orange County Mayor, has really helped us along with the other commissioners and introducing us to the businesses in our region, that we want to be proactive, especially the Hotel and Lodging Association, that we want to help them identify any of these—this activity so that we can keep our community a family friendly tourist attraction. And so reaching out to those—

Senator NELSON. Have they been a willing participant?

Mr. LARES. The Hotel and Lodging Association, yes; yes, sir. We're reaching out to the other sectors now and we've asked Mr. Rosen to facilitate hospitality training for all the other sectors we're trying to reach.

Senator NELSON. What other businesses in the Central Florida area do you see the most traffic?

Mr. LARES. One of the key, I think, trainings is going to be some of the taxi companies, particularly the Mears. I have a story of a Mears driver who came into—

Senator NELSON. That is to spot.

Mr. LARES. Yes.

Senator NELSON. Train the taxi drivers to spot trafficking.

Mr. LARES. Yes, sir.

Senator NELSON. What businesses in the Central Florida area would be susceptible? Mr. Goswami talked about the seafood industry over in Asia. What in Central Florida? What businesses?

Mr. LARES. I think—okay, so particular businesses, I think particularly would be, besides the hotels and any of those related tourism industries, I think that some of the restaurants. We have gone to those already. The other industries would be particularly with

the supply chain, that has been something that we—I want to speak with him to see what we could be—who we should reach out to. Because we’ve been focused on, sir, more the tourism and the hospitality industry, to be honest.

Senator NELSON. So you’re not talking about a specific restaurant, you’re talking about the supply chain that supplies the restaurants; in the case of Mr. Goswami, with the shrimp that they provide.

Mr. LARES. Yes, sir.

Senator NELSON. Thanks.

The CHAIRMAN. Thank you, Senator Nelson.

I want to, before I forget, enter into the record some letters from stakeholders, including a letter from Call to Freedom, an organization combatting human trafficking in South Dakota; a testimony from Chelsea, a victim of human trafficking and saved by Call to Freedom; written testimony from NATSO, which represents travel plazas and truck stops around the country on their efforts to prevent human trafficking; and written testimony from Airline Ambassadors International, which works with the airline industry on human trafficking awareness. So those will be entered without objection.

[The information referred to follows:]

PREPARED STATEMENT OF CALL TO FREEDOM

Dear Chairman Thune and Members of the Committee,

Defined as the recruitment, harboring, transportation, provision, or obtaining of a commercial sex act that is induced by *force, fraud, or coercion*, sex trafficking is the second largest and fastest growing criminal industry in the world. Although it is the second largest in the world, it often goes unnoticed.

Within the state of South Dakota, the number of sex trafficking related calls, arrests, and sentencing of traffickers has increased significantly over the last decade. Through prevention education programs, the news media, and victims sharing their stories, this injustice is being recognized; more victims are surfacing and seeking help. The U.S. Attorney’s Office has worked to prosecute those who have sex trafficked juveniles and women and arrests continue to be made during the Sturgis rally and around the state. Some shocking statistics include:

- 2nd to drug dealing, sex trafficking has surpassed the gun trade as the largest and fastest growing criminal industry in the world.
- An estimated 14,500—17,500 victims are trafficked into the U.S. every year.
- South Dakota has the 2nd highest trafficking-related calls in the U.S.
- 50 Federal cases have been reported in South Dakota.
- Interstates 29 & 90 (in South Dakota) make up “The Midwest Pipeline.”
- 1 out of 3 youth are susceptible to being sex trafficked within forty-eight hours of being homeless.
- More important are the faces and lives impacted.

One of the most vulnerable populations to sex trafficking are Native American women and children. Native American women experience domestic and sexual violence two and a half times more than their non-Native counterparts, which makes them more susceptible to sex trafficking. Additionally, because Native American women often face obstacles like a lower rate of education and generational poverty and trauma, this heightens the likelihood that they will be sexually exploited. Native American women often come from broken families and are surrounded by alcoholism and substance abuse within their communities. Within the Native American communities in South Dakota, victims are more likely to experience homegrown trafficking. Within the Native populations in South Dakota, the victims more than likely know who their traffickers are, whether it be a uncle, father, boyfriend, or sibling.

Another population that is vulnerable to sex trafficking are impoverished and foster youth, runaways, or youth who have been a part of the juvenile justice system. Within these populations, there is a lack of programs that provided trauma-informed care and mental health counseling to youth who have experienced sex trafficking. Without programs like these, youth are likely to be revictimized. As vulnerable youth often go without basic needs, like food and shelter, they accept help from traffickers who perpetuate a “nice” and “caring” persona. However, once these youth are dependent on traffickers for basic needs, they are either threatened or coerced into sex trafficking. Furthermore, the Department of Justice reported that annually, one hundred and fifty thousand youth will be approached by a trafficker within forty-eight hours of being homeless.

In August 2015, Call to Freedom’s executive director, Becky Rasmussen, went out on an outreach in Sturgis, South Dakota, that changed the direction of Call to Freedom. The outreach team would go and connect with those that seemed vulnerable. Becky felt that she should approach a young woman; she said “Hi, my name is Becky” and the young girl replied “Hi, my name is Marissa.” She began to connect with this young lady and towards the end of the conversation, Marissa was crying and kept saying “you have no idea what kind of day I’ve have, you have no idea what kind of day I’ve had” and then Marissa was gone.

Becky learned the next day from an international search and rescue group that Marissa was suspected of being sex trafficked and missing out of the Sturgis area. Marissa was in a situation where she was pulled into sex trafficking a few years ago, got out for a few months, but unfortunately was pulled back in. The group that Becky met with said it’s common for victims like Marissa to be pulled back in due to gaps in services and resources. If these women are unable to find assistance, they remain vulnerable and an easy target to be pulled back into sex trafficking.

In order to close the service gaps, Call to Freedom was founded as a nonprofit in 2016. Call to Freedom is an organization that provides supportive services for victims of sex trafficking by creating a strong network of frontline providers who offer safe housing, mental health counseling, medical assistance, addiction treatment, transportation, and other services. Within the past year and a half, Call to Freedom has provided intensive case management and supportive services to woman and children of diverse ages and ethnicities.

- *In 2016, Call to Freedom served:*
 - 30 victims of sex trafficking.
 - 30 families who were affected by sex trafficking, or had a family member that was affected by sex trafficking.
 - 60 percent were Native American,
 - 30 percent were Caucasian,
 - And 10 percent were of other ethnicities.
- *From January 2017 to June 2017, Call to Freedom served:*
 - 51 victims and family members of sex trafficking.

This population has diverse and complex needs. In order to provide services to meet client needs, Call to Freedom has reached out to the community and built effective collaborations in areas of mental health and addiction counseling, occupational therapy, employability, medical and dental care, and emergency shelter. Upon discovering a significant and permanent gap in safe and affordable housing, Call to Freedom rented an apartment building with eight efficiency apartments and from then on, Marissa’s Project House became a safe haven for sex trafficking and sexual exploitation victims. Marissa’s Project is safe environment that offers support and stability, which are necessary for successful long-term transitions out of sex trafficking and sexual exploitation situations. Not only are the women offered shelter, but they are also provided access to support services like occupational therapy, intensive case management, employment search and training support, and transportation. With the help of community donors, Call to Freedom has furnished the apartments and transitioned key case manager time to house/client case management. Since October 2016, Native American, Caucasian, Latino women, and two children have called Marissa’s Project home. Only a few of the women came in with employment, but all are now employed (at least part-time), sober, receiving mental health counseling, and transitioning out of the controlling abusive situations they have endured.

In order to successfully transition victims of sex trafficking out of dangerous situations, Call to Freedom partners with local and Federal law enforcement, the U.S. Attorney’s Office, community partners, and organizations that work to prevent sex

trafficking and educate vulnerable populations. As a result of identifying the gaps in services when navigating next steps for victims of sex trafficking, we plan to implement more trauma-informed resources through facilitation and training of the East River Human Trafficking Task Force. We have also identified gaps when it comes to providing minors and victims with specialized treatment. We need to make sure that these youth are not revictimized and are able to successfully transition out of sex trafficking. In order to address this gap, Call to Freedom wants to develop a specialized program for youth with an emergency crisis shelter that is fully staffed with trauma and addiction counselors, mental health assessment, and other vital services to successfully assess and treat victims.

We truly appreciate your attention to strengthen services to victims of sex trafficking. We are grateful for the opportunity to provide insight on this epidemic within the state of South Dakota.

Sincerely,

BECKY RASMUSSEN,
Executive Director,
Call to Freedom.

CHELSEA'S TESTIMONIAL

I grew up in a home of childhood sexual abuse. My dad raised me when my parents divorced, I was four. The first memory that I have of life was my dad molesting me; that continued as I got older. Soon after that happened he began to sell me to his friends and other people who were around the house. There were a lot of drugs and parties and people were everywhere, all the time.

Whenever he [dad] would sell my body and I would see a guy pay for me, I would like that the guy liked me and wanted to invest in me; it's where my worth came from. That continued until I was fourteen. By that time, the worth I had felt worthless. When I turned fourteen, I left home and tried to get away from it. Though I tried to get away from that life, it kept drawing me [back] in and I started to crave that worthiness.

When I first came to Call to Freedom, I knew that I wanted to help but I was also afraid to take it. When I walked into Call to Freedom's doors, I connected with a certain staff member and said "that girl looks like an angel." Since that day, that angel has stuck by my side.

When I came to Call to Freedom, I thought my life was ending. I couldn't see how I got out or how I would get out, but Call to Freedom has taught me that my life is only beginning. I have entire life ahead of me. Since coming to Call to Freedom, I've been sober for the first time since I was fourteen and can have dreams and shoot for bigger things.

PREPARED STATEMENT OF NATSO

Introduction

NATSO, the national association representing America's travel plazas and truckstops, submits this statement for the record with respect to the Senate Committee on Commerce, Science and Transportation's ("Committee's") June 12, 2017, hearing titled "Force Multipliers: How Transportation and Supply Chain Stakeholders are Combatting Human Trafficking."

As discussed further below, the truckstop and travel plaza industry takes seriously the fight against human trafficking, and has invested significant resources to help travel plaza owners and operators identify and report such unlawful activity.

Background

NATSO is a national trade association representing travel plaza and truckstop owners and operators. NATSO's mission is to advance the success of truckstop and travel plaza members. Since 1960, NATSO has dedicated itself to this mission and the needs of truckstops, travel plazas, and their suppliers by serving as America's official source of information on the diverse industry. NATSO also acts as the voice of the industry on Capitol Hill and before regulatory agencies.

NATSO currently represents more than 1,500 travel plazas and truckstops nationwide, comprised of approximately 1,000 chain locations and several hundred independent locations, owned by more than 200 corporate entities.

NATSO also operates the NATSO Foundation, which is the research, education and public outreach subsidiary of NATSO, Inc. The NATSO Foundation provides education and research for the truckstop and travel plaza industry as well as pro-

grams and products aimed at strengthening travel plazas' ability to meet the needs of the traveling public through improved operational performance and business planning.

Travel Plaza Industry Efforts to Combat Human Trafficking

For nearly six years, the NATSO Foundation has been helping members of the truckstop and travel plaza community engage in the fight against human trafficking. Because human trafficking has been reported across all modes of transportation, it is critical that the Committee conducts this hearing, and we applaud the Committee's participation in this effort.

Human trafficking perpetrators utilize many legitimate businesses—unbeknownst to the business owners and employees—in connection with their crimes. The truckstop and travel plaza industry is united along with other transportation providers to stop the flow of human trafficking using America's transportation system.

Human trafficking victims are frequently transported via the Interstate Highway System. As an industry that caters to millions of highway travelers every year, truckstops and travel plazas and their employees are in a key position to help identify and report suspected incidents of human trafficking along America's highway system. The industry is taking meaningful action to ensure that it is prepared to respond.

At the NATSO Foundation, one of our goals is to provide our members with the tools they need to train their staff so that those individuals are equipped to help if they encounter a victim of this horrible crime. Travel plaza and truckstop owners and operators have a vested interest in their businesses and are highly focused on crime prevention. The safer the environment a truckstop creates for its customers, the more customers a truckstop will have. Operators keep a trained eye on everything that happens at their locations.

The NATSO Foundation has taken a lead role within the transportation sector, creating public awareness and educational materials that help truckstop owners, operators and their employees:

- understand what human trafficking is;
- recognize signs of human trafficking; and
- appropriately respond to and report suspected incidents of human trafficking.

More specifically, the NATSO Foundation has developed an online education tool called "The Role of Truckstops in Combating Human Trafficking." The program is designed to strengthen the Nation's truckstop and travel plaza industry by delivering comprehensive online educational and safety training materials to truckstop owners, operators and employees. The course, which is *free* to any member of the truckstop and travel plaza community, teaches truckstop owners, operators and employees how to identify and respond to suspected incidents of human trafficking. Since its launch, several hundred truckstops and travel center locations throughout the country have incorporated this training into their new employee training programs.

In addition to this education tool, the NATSO Foundation since 2012 has:

- Co-sponsored regional coalition meetings with Truckers Against Trafficking, state trucking associations and law enforcement that provide an opportunity to educate members of the business community, transportation and law enforcement about human trafficking. These meetings serve as an open forum to discuss human trafficking trends in regional areas and to explore ways to combat this crime. To date, the NATSO Foundation has co-sponsored nearly 25 regional coalition meetings across the United States.
- Worked closely with the Department of Transportation, Polaris Project, the National Center for Missing and Exploited Children and other national and local organizations to gain insight into best practices on how to educate members of the travel plaza industry about human trafficking.
- Partnered with the Department of Homeland Security's Blue Campaign, which is that Agency's comprehensive effort to end human trafficking. Through this alliance, the NATSO Foundation provides the DHS Blue Campaign's training and awareness materials—such as posters and handouts and other education materials—to the Nation's truckstops and travel plazas to enhance the NATSO Foundation's educational resources.
- Worked in support of the U.S. Department of Justice's AMBER Alert program and the National Center for Missing & Exploited Children® (NCMEC) as a secondary AMBER Alert distributor so that Amber Alerts containing information

about abducted children can be displayed at truckstops and travel plazas across the country.

- Similarly, the NATSO Foundation encourages its member companies to participate in the National Center for Missing & Exploited Children's High-Risk Child Poster Listserv so that truckstop owners and operators can share posters with their customers that help increase the visibility of missing children at high risk for sex trafficking.

Conclusion

Private enterprises can make a meaningful difference in the fight against human trafficking if they take the time to learn about and invest resources toward combating it.

The NATSO Foundation is committed to investing the time and resources necessary to help the truckstop and travel plaza industry do all it can to combat human trafficking.

NATSO and the NATSO Foundation commend the Committee for focusing on this important issue and for allowing the truckstop and travel plaza industry an opportunity to share information about the many ways in which this industry is taking a lead role to stop the flow of human trafficking using America's transportation system.

Please feel free to reach out to me directly if I can answer any questions or provide any additional assistance.

TIFFANY WLAZLOWSKI NEUMAN,
Vice President, Public Affairs,
NATSO.

PREPARED STATEMENT OF NANCY L RIVARD, PRESIDENT, AIRLINE AMBASSADORS

The critical infrastructure of our transportation system can no longer be used as a tool to implement human trafficking, or modern day slavery. This is also the fastest growing crime in the world. It is linked to drug trafficking, human smuggling, arms trafficking and terrorism, also; human trafficking aboard aircraft is a cabin safety issue.

Traffickers often use the speed, convenience and comparative safety from detection of commercial air travel. The International Air Transport Association (IATA) shows 3.6 billion global passengers in 2016 and U.S. serving airlines carried 928.9 million domestic and international passengers.

Airline personnel can be "eyes in the skies" providing vital intelligence to law enforcement. They can be a force multiplier in the fight against human trafficking. One flight attendant interacts with a minimum of over 500 passengers per week. This translates to 24,000 passengers per year.

Airline Ambassadors International (AAI) was established in 1996 as a non-profit organization made up of members in the airline industry. AAI has led advocacy on human trafficking awareness since correctly identifying trafficking on four flights in 2009. Working with Congressional members and government agencies they developed an "industry specific" training, which has been provided to 5,000 frontline personnel at 57 U.S. airports and international locations. This training is provided by volunteer flight personnel and survivors of human trafficking and is consistent with the "Blue Lightning" protocol of the Department of Homeland Security.

The story of an Alaska Airlines flight attendant, Shelia Fedrick who saved a little girl with a note in the bathroom, went viral in February 2017 with over 2,000 media citations. Shelia is an AAI trainer and this is only one of dozens of stories of victims who have been saved as a result of these prevention efforts.

Airline Ambassadors International commends the leadership of Senator Thune for the FAA Reauthorization Act of 2016 (S. 2658) which includes the requirement that flight attendants be trained to identify and report potential trafficking aboard flights. Since the new legislation, most airlines have now adopted a human trafficking policy and have implemented a minimum level of training for flight attendants. However, there is still more work to do to strengthen this momentum.

Problems Still Needing Solutions Airline Industry

Oversight

There is not adequate oversight evaluating effectiveness of training on human trafficking awareness in the airline industry. There is not motivation for companies to ensure maximum effectiveness of such training of flight attendants, or to train

other critical employee groups at major human trafficking transit hubs, including airports.

Flight Attendants

Positive momentum has begun with several airlines adopting the DHS Blue Lightning computer based training, or a few slides in the on line portion of recurrent training. However many airline professionals have said they do not pay close attention to on line trainings and the typical flight attendant glosses through on line trainings as fast as they can, and very little of the information is retained. The issue of human trafficking awareness is not even mentioned by the training staff of most U.S. based airlines during annual training. Emphasis by trainers is needed in recurrent training.

Pilots

When flight attendants report suspected trafficking situation on board they are to inform the pilots, who are to radio the upcoming airport, to contact law enforcement for evaluation. However, in two recent cases the pilots refused to report despite the fact that flight attendants were concerned and the procedure was in their "In Flight Manual". The pilots stated that they were reluctant to cause a problem for the passenger and the suspected trafficker and victim deplaned unhindered. . This issue needs to be addressed in pilot recurrent annual training so pilots will feel comfortable following the procedure.

Operations personnel

Operations personnel are also not trained. Their responsibility is to monitor hundreds of flights arriving at each major airport location. When questioned recently on what action would be taken if a pilot radioed in a potential human trafficking on the flight, one supervisor replied that he would take no action, as this issue was not related to aircraft security.

Passenger Service Agents

Agents also see trafficking indicators when interacting with customers checking in for flights and are not trained how to respond. Some have shared that they have seen many potential cases but did not know who to report to and were even concerned about risking their jobs. Many have said they would like training so that they know what is expected of them, and most are quite willing to act.

Lack of Corporate Commitment

Although the private sector is critical in this fight, most airlines truly do not understand the importance of human trafficking awareness and hesitant to integrate new actions into their corporate cultures. They are nervous that vigilante flight attendants will make false accusations and cause a lawsuit. They have no motivation to ensure proper training for employees, eliminate trafficking in the supply chain or adopt policies on this issue that include providing of training and job opportunities for victims. When AAI sent a letter on April, 2017 to the CEO's of 24 airlines and hospitality companies to support human trafficking policies and being open to hiring survivors—there was no response.

Data Sharing—Law Enforcement

The Department of Homeland Security was created under the Patriot Act to coordinate information among agencies and partners to secure our critical infrastructure, but this information is not shared. Despite formal FOIA requests for how many tips came from airports where trainings were given, no information was shared and thus, evaluation of training programs cannot be measured. Although details of law enforcement cases should remain confidential, the sharing of information on how many tips were received, and if they led to arrests or prosecutions would provide valuable data for NGOs, airlines, academia and the American public.

Reporting Mechanisms

The current public reporting systems for receiving human trafficking "tips", cannot receive data rich information from the partners that is seeks to empower. For example, AAI employs a smartphone application that can transmit encrypted trafficking data in critical real time, but law enforcement and NGO partners cannot receive such data, including video, recordings, text and pictures.

Department of Homeland Security has spent millions of dollars on an excellent advertising campaign on human trafficking awareness with posters highlighting sex, domestic servitude and labor trafficking, but

1. The reporting phone number is different from the National Human Trafficking Hotline (NHTH) # which is confusing for the general public.

2. The DHS Hotline is not a direct number
3. Although the National Human Trafficking Hotline can receive texts there is no mechanism to receive data rich information by either Hotline, which many AAI trained professionals are equipped to provide.

Recommendations

Oversight

1. The relevant critical infrastructure oversight agency (FAA or DOT) should be established to provide minimum results based educational standards to oversee compliance to human trafficking training for airline transport industry.

Enhanced Training for Airline Personnel

2. Minimal, on line training should be supplemented with classroom mention and training should be required for all frontline or relevant employee groups—flight attendants, pilots, operations personnel and passenger agents.

3. Legislation to require airlines to train staff could provide resources for live Train the Trainer programs on human trafficking to training staff of major U.S. based airlines. Such training should include live participation of survivors of human trafficking to make the issue come alive for trainees, so training staff of each airline will understand the issue and emphasize it during annual recurrent trainings.

Corporate Commitment

4. Legal protection offered to airline and employees who report potential trafficking be established along with a reporting protocol to FAA or the Department of Transportation.

5. Tax incentives be considered for companies for providing minimum standards in compliance to combat human trafficking, (*including training of employees, elimination of trafficking in the supply chain and willingness to provide jobs to victims of trafficking.*)

6. Federal Government consider providing incentive to airline companies by deciding to book government travel only on those air carriers meeting minimum standards for corporate social responsibility in this area.

Data Sharing

7. A system be established to measure the number of trafficking tips received from airports, airlines and airport employees and number of “tips” which lead to actual cases and prosecutions.

- a. That data be shared with relevant partners or academic institutions for evaluation.

Strengthen Reporting Mechanism

- b. Establishment of an e-mail address to be monitored 24/7 as a system for reporting potential human trafficking “tips” for quick response and the ability to receive data rich information—phone, text, e-mail, pictures, video and geo-location to ensure prompt action and the ability to receive rich data—rather than just a phone call or text

In the words of the Association of Professional Flight Attendants, APFA:
largest flight attendant union in the United States:

“We are committed not only to preparing our membership to recognize and report suspected instances of human trafficking, but also to raise public awareness of the problem. Flight attendants have thwarted these criminals in the past, but putting an end to human trafficking will require a coordinated and sustained effort as well the commitment of the entire transportation industry.”

The CHAIRMAN. Senator Blunt.

STATEMENT OF HON. ROY BLUNT, U.S. SENATOR FROM MISSOURI

Senator BLUNT. Thank you, Chairman. Thank you and Senator Nelson for holding this hearing.

We’ve been increasing funding the last couple of years for this topic. Hopefully, that’s beginning to have an impact. I think the Health and Human Services Victims of Trafficking program went

from \$15.8 million to \$18.8 million in the last 2 years. The hotline, the human trafficking hotline, got a 50 percent increase.

And, Ms. Sorensen, I think Polaris operates that hotline for HHS. Would you give us a little sense of how you're using—how the hotline is being used and how important that funding may be?

Ms. SORENSEN. Sure. Thank you. So we've had a 24 percent increase in calls, texts, and other signals on the hotline in the last year. Since Polaris got the program, so that was December 7, 2007, we've had a 650 percent increase in contacts. So that money was vastly important and continues to be vastly important for the basic functioning of that hotline.

The kinds of signals that we receive from people tend to be multilayered. So we will hear from someone who is experiencing the sense that something is wrong, and that might be the first of six or seven calls before they're ready to leave a situation.

Our calls from victims directly have gone up exponentially over the last few years from something like 5 percent to around 20, but I could get you the exact figures. So those calls just take a lot more time because they often involve a very delicate situation.

But we do hear also just as often from community members reporting a tip. And reporting tips is complicated. You want to make sure that those tips are actionable by law enforcement, and so seeking out the correct level of information, the correct details, is of paramount importance to us as well. Our calls from victims directly have gone up by 241.4 percent between calendar year 2012 and calendar year 2016. In 2016, calls from potential victims made up 16.7 percent of all substantive calls that year.

Senator BLUNT. So 80 percent of the calls you get are from people who think they've seen something happen that shouldn't be happening? You said 20 percent are from—

Ms. SORENSEN. I can get you the exact number. I actually have that percentage broken out by state.

Senator BLUNT. OK.

Ms. SORENSEN. I don't have it nationally right now.

Senator BLUNT. OK. I don't know that I need that.

Ms. SORENSEN. Yes.

Senator BLUNT. But most of the calls are from people who think they've seen something. But you've got an increasing number of calls from people who are victims?

Ms. SORENSEN. That's correct.

Senator BLUNT. How do they know to call? Where do they find that information?

Ms. SORENSEN. Yes.

Senator BLUNT. Where do they find that number?

Ms. SORENSEN. So, gratefully, we've worked with the Federal Government and with Congress specifically to ensure that we have additional places for educating people about the risks to trafficking, posts in Federal buildings, posts in airline centers or in transportation hubs. We actually worked for years to pass State laws so that we could specifically proliferate the hotline number in important locations where we saw the most calls from those centers, whether they were rest stops, whether they were maybe strip clubs, other areas where we thought someone was vulnerable or at risk.

There's a lot more to be done on public awareness. We know that we're still not reaching some of the most at-risk populations, particularly those who are working as subcontractors on agricultural crews or other kinds of labor settings. So there is still a lot to do.

Senator BLUNT. Let me get another couple of questions in here.

Ms. Goetsch, in your testimony, you said that 31 states have adopted the Iowa model for Truckers Against Trafficking. Would you submit those states for the record? If we have those, I don't know that we have them, and it wouldn't hurt us to have them twice if we don't.

Mr. Goswami, you noted that a number of companies were trying to proactively look at their supply chain, and I think I've heard this mentioned a couple of times already, where the supply chain for major companies are much more likely to be a problem than the stores themselves. And what are they doing at the—stores, like you mentioned, Walmart, what would a store like that be doing to verify that their supply chain has the integrity for workers that they would like it to have?

Mr. GOSWAMI. Thank you for that question. So obviously, as you can imagine, Walmart has a very large and complex supply chain with tens of hundreds of suppliers that also provide goods in their retail outlets. And I can speak to what Walmart has done with the Issara Institute in Thailand in our Asia—in our region.

We face a hurdle where there are multiple smaller operations that are providing fielding services, fishing services, et cetera, to suppliers that may eventually end up in seafood products that are in U.S. stores and Walmart, and it's hard for Walmart to get visibility into the very bottom rungs of that supply chain.

So they have been partnering with us to develop technology tools, including this app that I mentioned called Golden Dreams. It's a Burmese language app. And with their funds, we've been able to outreach this app out to various populations in their own language. About 3,000 folks, workers, have signed up to it, and they're giving us data every day on what their experiences are, which we can then take back to Walmart and match that with their suppliers who may be impacted by that data, and then drive improvements.

And Walmart, at least in our region, has been very good about using their supply chain leverage to ensure that their suppliers, if they want to continue to do business with Walmart, are acting upon the data that we provide.

Senator BLUNT. Thank you.

Thank you for the time, Mr. Chairman.

The CHAIRMAN. Thank you, Senator Blunt.

Senator Schatz.

**STATEMENT OF HON. BRIAN SCHATZ,
U.S. SENATOR FROM HAWAII**

Senator SCHATZ. Thank you, Mr. Chairman.

I just want to thank all of you for the work you do. It's not often that we have unanimity on this Committee, but you certainly have it here in terms of our commitment to solve this problem.

I would like to just go down the line and get some data, and if you're not able to give it to me in the moment, I'll take it for the record. But I just want a sense for the scope of the problem, the

size of the problem. In your testimony, you didn't give numbers, and it may be that those data don't exist. But if we could just talk about the extent of the problem by sector in the United States, that would be great, starting with Ms. Sorensen.

Ms. SORENSEN. Yes. Give me a moment because I did prepare some stats for you. So in terms of—so there are a lot of calls—I should be clear. There are calls we get where someone does not give us information about the sector, does not give us information about the trafficker, doesn't give us information about themselves. So when I tell you that there are over 32,000 calls where we've pulled data, I want to be clear that out of all of those, we've been able to run venue and sector information on 18,786 of those. OK? Because there just wasn't that information for everyone.

Senator SCHATZ. That's in one year. That's in one year?

Ms. SORENSEN. No. This is all-time human trafficking cases. So December 7, 2007 to April 30, 2017.

Senator SCHATZ. OK.

Ms. SORENSEN. That's my timeframe for you. So we've got related to the labor trafficking sectors, which I mentioned were 18, we've got domestic work is the leading sector where we see the most human trafficking. After that, I'm looking at traveling sales crews, followed by restaurants and food service—

Senator SCHATZ. Sorry. What is a traveling sales crew?

Ms. SORENSEN. Sure. A traveling sales crew is typically someone who comes door-to-door to sell cleaning products, magazines, candy, et cetera. It's typically a network of illegitimate businesses, and it's usually runaway kids.

Senator SCHATZ. Yes. Yes.

Ms. SORENSEN. OK. After that, we have records from the health and beauty services, so that's labor trafficking within those, not just sex trafficking, which we also see. And then it's agriculture and animal husbandry.

Senator SCHATZ. Before we go down the line, it seems to me you're getting data coming in—

Ms. SORENSEN. Yes.

Senator SCHATZ.—and those are the calls that come in. They may or may not be proportionate—

Ms. SORENSEN. That's absolutely right.

Senator SCHATZ.—to sort of the problem by sector. So maybe instead of going down the line, it seems to me that there's a data problem. We don't—

Ms. SORENSEN. Oh, there's an enormous data—

Senator SCHATZ. We actually don't know the scope of this problem. We don't know in terms of raw numbers or by sector necessarily in which sectors this is the biggest problem. We don't know if it's hundreds of thousands of people or tens of thousands of people. You may have a sense of it at the line level, but we just don't know, do we?

Ms. SORENSEN. Senator, that's totally correct, and that's a huge problem that Polaris and others in the field have been highlighting for years. We actually have a proposal for a prevalence study that we would love Congress to consider because we think that this data is absolutely insufficient to form our policies around. It is incoming data only.

Senator SCHATZ. OK. So rather than go down the line, I want to get to one other question. In Hawaii, we had an instance of trafficking in the construction context. And the way that the bad guys were nailed was with a partnership with a carpenters union.

And so I'm wondering if any of you can comment on the partnerships actually with labor or with the chamber, because it seems to me that they have, both at the management and at the labor level, that that's the most logical approach. And I'm wondering, there was not a mention of organized labor or unions, and it seems to me that that would be a smart place to start because they have both an ideological alignment with what's happening and an imperative in terms of their organizing that aligns with this. So do you have any thoughts? And I'll start over here.

Mr. LARES. In Florida, the Farm Workers Association, the Coalition of Immokalee Workers, those are some of the more of the agricultural—what we have, I would say, the more organized groups in Florida because of how our state—the various laws, and the limited or lack of unions. But those would be the ones that have organized our state. For example, right now with the tomatoes, they are asking for some of our stores—one of the biggest grocery stores in Florida is Publix, to give a penny more toward the workers.

So they're organizing our communities and the agricultural industry. That's the extent that I've seen.

Senator SCHATZ. And very quickly, Mr. Goswami and Ms. Goetsch.

Mr. GOSWAMI. Thank you, Senator. I'm going to actually try to answer the first question you had about data and numbers.

Senator SCHATZ. Sure.

Mr. GOSWAMI. Yes, there definitely is a need for better numbers, but I would also argue that we do have enough numbers that we need to act upon and act more rigorously on with more resources.

I can tell you that in the Thai seafood sector, there are about 4 million or so migrant workers in Thailand, that the government estimates that about 300,000 of which work in the seafood industry. And there were a couple studies that have been done recently both by Issara and by Johns Hopkins that show that roughly a third or so are victims of exploitation that could be forced labor and trafficking. I know for Issara itself, through our hotlines, we get about 6,000 calls a year, and many of whom are, if not victims of forced labor, other egregious forms of illegal labor conditions that they're in. So we know enough and we have better tools to collect that data, but we do have to respond to the information that we get.

Senator SCHATZ. Excuse me. My time has expired. I appreciate it. Thank you.

The CHAIRMAN. Thank you, Senator Schatz.
Senator Fischer.

**STATEMENT OF HON. DEB FISCHER,
U.S. SENATOR FROM NEBRASKA**

Senator FISCHER. Thank you, Mr. Chairman.

Ms. Sorensen, as you noted in your testimony, the Polaris Project has identified and defined 25 different types of trafficking. And can you talk about why it is important that we understand the dif-

ferent forms of trafficking and how identifying the forms can help us to understand and then combat the traffickers?

Ms. SORENSEN. Yes. Thank you, Senator, for the question. I think there are two ways that we see it. The first is the importance of understanding the types. Each type has its own network of traffickers, recruiters, smugglers maybe, and individuals who make up an at-risk vulnerable population. Each type tends to take advantage of certain kinds of vulnerable classes, whether they're foreign national or U.S. citizen.

When we understand the types in their most comprehensive forms, we have the ability to direct policy to actually dismantle them most effectively, whether that's targeting prevention education toward a particular class that might be migrating, or whether that's figuring out how to create better AMLs, so that financial institutions can look for certain signs that would only be present in particular types of trafficking. So I think in building out that understanding, we can be very targeted in our response.

The other thing I would highlight is that there are cross-type issues we can leverage, whether it is the supply chain transparency provisions, whether it's child protection provisions, whether it's gender equity provisions. There are things we can do that would actually help us to dismantle types through this unique grouping strategy. And so the strategy from our perspective is doing both, being able to tackle these things holistically in any way we can.

Senator FISCHER. And you briefly mentioned the Department of Transportation's Transportation Leaders Against Human Trafficking Initiative, and specifically the campaign that's put the brakes on human trafficking. Can you elaborate on the work that the Polaris Project is doing with the Department of Transportation? And is it effective? Is that program effective?

Ms. SORENSEN. So Polaris's work with the Department of Transportation was a few years ago. I can absolutely get you notes on what we did, but it isn't current, so I wouldn't be able to comment on that.

[The information referred to follows:]

Polaris was involved as an advisor to the U.S. Department of Transportation in 2013 and 2014 when they were working on a human trafficking public awareness raising initiative. They had launched a group called Transportation Leaders Against Human Trafficking, and we were part of that group, and attended the group meetings hosted at DOT as an NGO representative. We also advised the public awareness campaign that came out of this group as a recommendation called Putting the Brakes on Human Trafficking. What was unique about this effort is the number of new stakeholders it brought to the table. Through TLAHT, we were able to meet new government agencies and new major players in the transportation industry whom we had never met or engaged with before. We were pleased to see the DOT public awareness campaign promote the U.S. National Human Trafficking Hotline number at 1-888-373-7888 at unique new locations and with new stakeholders across the country. A number of new corporate relationships emerged from this initiative, and the effort helped to connect the dots to inform different government agencies of the role they can play in combating human trafficking.

Senator FISCHER. OK. And for the panel, we have several Federal agencies that are tasked with different grants and objectives to train and equip state and local governments to better address human trafficking. And do these agencies coordinate among themselves? Do they do so adequately? Do they work with state and local law enforcement? If we can begin down here, please.

Mr. LARES. Sure. We, in the greater Orlando area, we have a very unique vice unit that both the Federal, the state, and the local law enforcement are comprised of. It's called the Metropolitan Bureau of Investigation. And so we have amazing collaboration because of that unique vice unit that we have in the City of Orlando. And that way if it's across state lines or whatever jurisdiction, that it can address that potential victim or get that trafficker without—you know, it's more seamless.

So from that level, I know that the funding sources don't necessarily mix, but because of our unique vice unit, we are working together. So I couldn't really address the funding source or who's getting what.

Senator FISCHER. Have you seen an increase in arrests? And is that due to more activity by the vice unit and working with others, or is it an uptick in activity with human trafficking?

Mr. LARES. I think it has been really key with the awareness more and more as the awareness gets out there, especially with the Polaris hotline, that we've been able to really post just every stakeholder. So the dozens of stakeholders that comprise our task forces a lot of times put on their websites.

So I think, Senator, it's more of a—I don't think the problem is getting worse, I think that people are reporting, and as she stated earlier, we've seen more victims self-identify in the last year than I've seen in the last 13 years. So they're getting the information where it's on the street that there's help.

Senator FISCHER. Thank you.

Sir.

Mr. GOSWAMI. Thank you, Senator. I can only speak to again Southeast Asia, where we operate. And unequivocally, the funding and assistance and partnership we receive from USAID, specifically their supply chain initiative, and the U.S. State Department has really helped us both innovate in the technology arena so we can capture more stories of workers through technology, but also do on-the-ground programming working with suppliers and taking an act upon those stories and make the necessary changes.

Senator FISCHER. Thank you.

Ms. GOETSCH. Yes. So we do work with the Federal agencies across the Nation, but I would say it varies state by state as far as our public-private partnership with them and how that's fleshed out on the ground level. So we do really look to activate local law enforcement because typically they're going to be the first responders when you're talking about travel plazas or truckers making calls.

And, you know, with the hotline, all of our material that's going out to the trucking industry has a hotline because we want to continue to seamlessly work with law enforcement who are trained on human trafficking and who are going to respond appropriately and arrest the trafficker and the buyer and hopefully recover the victim.

Senator FISCHER. Thank you.

Ms. Sorensen.

Ms. SORENSEN. Sure. So I just wanted to speak to the integration of law enforcement with the National Hotline specifically. And so one of the responsibilities in operating the hotline is not just to as-

sist the victim with their real-time concerns, but also to make reports where appropriate. And so while we have confidentiality policies and reporting policies, unless—most of the time victims do choose to report, and so we have protocols, hundreds of protocols, throughout the country that are locally based, but national in scope, that cross Department of Homeland Security, Federal Bureau of Investigation, local police.

And it's really up to the state and locations how they want to integrate their policy so that they work on the ground, whether it's a call at 3 a.m. about a domestic minor sex trafficking victim or maybe it's about a foreign worker who's in agriculture. Right? We need to make sure that they can appropriately respond and that that victim is safe.

Senator FISCHER. Thank you.

Thank you, Mr. Chairman.

The CHAIRMAN. Thank you, Senator Fischer.

Senator Cortez Masto.

**STATEMENT OF HON. CATHERINE CORTEZ MASTO,
U.S. SENATOR FROM NEVADA**

Senator CORTEZ MASTO. Thank you, Mr. Chairman and Ranking Member. This is a great conversation. Let me just first of all say this. I'm from Nevada. I was a former Attorney General there for 8 years. Thank you to the Polaris Project. You are instrumental in my state in helping us address this issue, which I look at as human trafficking, really breaking it down to labor trafficking and then sex trafficking, and then further, different types underneath. And in Nevada, we really focused on the domestic side of human trafficking. So thank you for what you do.

Thank you to the Trucking Association. Because of your help and support, our Nevada Trucking Association has an incredible program to educate our truckers. And I went through every single truck stop in Nevada with our Trucking Association to educate and talk about how we address this issue in human trafficking.

But before I forget, let me ask a couple of questions. The hotline is instrumental. And I agree, we do not have enough data collected nationally. There is data locally. The vice units. I know in southern Nevada, our vice unit collects data and has been over 10 years, so that has helped us, but we don't have enough of it nationally.

The hotline is a great help. And you're absolutely right. One of your partners that I think is key are the Attorneys General because of the work through the Attorneys General and the data that we've collected, you give that back to the states, and we do something with it.

The hotline calls that you get, though, are not necessarily victims, though. They could be from anyone. And they don't necessarily always pan out as a human trafficking incident, but we want to make sure people know about it. Is that correct?

Ms. GOETSCH. That's absolutely correct.

Senator CORTEZ MASTO. Right. And in the state of Nevada, not only did we work to pass State law to make sure that the hotline is located in many of our buildings, many of our task forces, many of our groups are working under the same premise that the hotline

is key. So we should use that at a national level and promote it everywhere we go, so thank you for that.

So it's a space that I've worked in for a number of years, and we still have work to be done. One is on the demand side, which we really need to focus on. And so I appreciate the Chairman. And I heard that you're looking at addressing this potentially. I would love to work with you on that.

But the other is the training, and this is sort of my pet peeve. Training is absolutely necessary. And there are different types of training, however. I know working with victims, not every victim, particularly of sex trafficking, realizes they're a victim. And then there is a level of trust. And the training we provide to a first responder versus a training we provide to somebody in the trucking association or in our airports is going to be different. And there is always this talk about we need to fund training, we need to promote it, but we don't talk about what the training should be, what it should look like. And because of it, there are so many people that want to help, but I don't know if we're doing the right by those victims and the responders in identifying this.

So what I would like to see, and I'm curious about your thoughts on this, is to have some sort of national standardized training model or a center of excellence where we can actually bring people together to figure out the type of training that is necessary for the type of human trafficking we see, and then send them back to their states or wherever where they're providing that type of training that is specific. I'm curious your thoughts on whether that is needed or not?

Ms. SORENSEN. Sure. Thank you for the question. And I would love to hear Esther's response to this as well, given her very particular lens.

So we have—yes, we have encountered a problem about quality in training for years. And one of the responses that the Federal Government set up was in instituting the Office of Victims of Crime Training and Technical Assistance Center that specifically focused on human trafficking training for task forces and local communities. It has been very successful in its efforts to create a level of quality for those audiences and associated audiences.

Health and Human Services recently also built a pilot training for health care providers, and their method of going about this was to bring survivors to the table, bring medical professionals to the table, dental professionals, psychiatric professionals, and NGO advocates, and take about a year and a half to actually build and test something that they're now feeling fairly confident about. That was the first time that I saw something really thoughtfully integrated into the community for specific audiences, but to do so in all of the—I would say, going back to Senator Heller's question, the idea of these cross-purposed types, like when we're looking at vulnerable populations, how do we address for that? How do we address for the sectors that are most influenced or impacted by human trafficking? I love the idea.

I think a group that I would love for you to float that idea by is the U.S. Advisory Council on Human Trafficking. I think they're going to have a lot of thoughts on this. And since they are already giving feedback to Federal agencies specifically on training, I think

they're going to be able to reflect for you the challenges that are currently facing the agencies and how you might be able to address those from a policy lens.

Senator CORTEZ MASTO. I appreciate that. I'm really curious, though, in bridging that gap between what's happening at the Federal level and the State level. So let me address this as somebody who came from the law enforcement side. In the state of Nevada, we had no sex trafficking crime. Most of the sex trafficking was prosecuted at the Federal level because there is sex trafficking crime at the Federal level. So we passed a state crime of sex trafficking, which then gave our DAs, the Attorney General's Office, the ability to now investigate and prosecute and go after it at the State level as well because unfortunately there's enough work to go around.

I think—I can't speak for every state. I know that's what was different in Nevada, and that's why now we have the ability to do it at the State level and the Federal level. I want to make sure, though, the Federal training that is still needed out there, whether it's for law enforcement or whoever, that the state—the folks, the nonprofits, that are also providing the training, are doing the same thing. They should be collaborating. There should be this networking and connection, and that's why this kind of idea of a center of excellence or the standardized training is important. So I appreciate that.

Any other comments other than I appreciate the conversation today?

[No audible response.]

Senator CORTEZ MASTO. Thank you very much.

Thank you.

The CHAIRMAN. Thank you, Senator Cortez Masto.

Mr. LARES. Could I ask the Senator a question? Yes. That—did you—was it mandatory in Nevada for law enforcement to report the data?

Senator CORTEZ MASTO. It was not mandatory, but because we came together as the Task Force, and this was a focus of everyone in the state, we shared the data. So law enforcement in southern Nevada automatically was collecting, the vice unit was already collecting that data for over 10 years—both on the child side and the adult side. Northern Nevada, they started collecting some of the data. The challenge we had, though, is not apples and oranges, right? So somebody might be collecting data in northern Nevada that is different than southern Nevada, so you couldn't put the two together. So there still needs to be that standardization, and that's what the task forces should be working to do.

Mr. LARES. Yes, ma'am.

Senator CORTEZ MASTO. Yes.

Mr. LARES. Thank you.

Senator CORTEZ MASTO. Thank you.

The CHAIRMAN. We're just discussing, though, that's a first whether someone on the panel asks a Senator a question, so—

[Laughter.]

The CHAIRMAN. We may be creating a new precedent here, who knows.

[Laughter.]

The CHAIRMAN. Senator Cantwell is up next, but I understand you're yielding some time to—

**STATEMENT OF HON. AMY KLOBUCHAR,
U.S. SENATOR FROM MINNESOTA**

Senator KLOBUCHAR. Yes. I'm just going to thank all of you. We have the FBI hearing. I'm not just leaving because I don't want you to ask me a question.

[Laughter.]

Senator KLOBUCHAR. And I'm actually going to ask Christopher Wray about human trafficking. But I just want to thank you for your work. As you know, we've been long involved in this, and it's always been bipartisan. Senator Cornyn and I passed the major bill, and I want to thank Senator Thune and Nelson for their work, Ms. Cortez Masto and many people here. And I really believe this work we're doing now training people in the private sector is going to be very important as well. Two reasons, one, more eyes, ears, on the ground; but, two, it makes more people aware of this problem, which is still a huge problem in our country when you talk to police officers that are in undercover operations. It's unbelievable numbers. So thank you so much for your work.

Thanks.

**STATEMENT OF HON. MARIA CANTWELL,
U.S. SENATOR FROM WASHINGTON**

Senator CANTWELL. Thank you, Mr. Chairman. And again I also want to thank you and the Ranking Member for holding this hearing and for our panel and the discussion. It is so, so important, and so I thank you for the work that you're doing.

Mr. Goswami, I wanted to ask about obviously the victims of trafficking. You've talked about how oftentimes they are brought here illegally from various countries or put into slavery-type conditions. And obviously this is one of the things we have to crack down, and obviously lots of things that we need to be doing.

What about the actual victims once they are brought out of the situation, what do we need to be doing to make sure that they get the medical services they need? Because I'm worried that some of them being the victims of this are afraid to come out of the—we were involved several years ago with our colleague Senator Brownback on some legislation on the male order bride industry, and we found out that people, women, were being recruited to come to the United States and be married to somebody, but they would very rarely feel comfortable in coming out of the dark when abusive treatment and all sorts of things happened because they thought, well, I'm going to be deported. And so they would not come out of the shadows. And we were able to successfully put some new regulations into that area of the law so that, first of all, women knew who these individuals were so that they weren't just, "Oh, yes, come to America and get married to somebody." We wanted to make sure it was disclosed if they had any kind of criminal backgrounds, all this. But, anyway, it exposed this coming out of the shadows effort. So what are we doing to help these victims when they can come out of the shadows and get the kind of medical and social services treatments that they need?

Mr. GOSWAMI. Thank you, Senator. That's a very interesting question and probably requires more than 5 minutes. I'll talk briefly about the experiences we've had working with primarily Burmese, Cambodian, and Lao migrants in Thailand who do come to Thailand because there are better economic opportunities for them there. Sometimes they migrate willingly on their own because they are pursuing a job, or sometimes they are trafficked into Thailand as well.

One thing that we've done, many surveys of workers and migrants in our areas, to determine what their needs are so that we are adequately meeting those needs, or referring them to organizations I can. And we find that time and time again most of them want compensation for the labor that they did, that they were not paid to do or that they were forced to do in slavery-like conditions, even unpaid overtime, et cetera. So they do want—they want their just due. They also want access to jobs.

And that's why our methodology of working with global plans and U.S. companies to put pressure on their suppliers to improve working conditions so that those workers can continue to work but in decent, fair, and legal conditions so they can provide for themselves and their families.

We do find, by and large, that after those first two needs of getting decent employment and fair wages, their needs are a whole host of social as well, which I think the Polaris Project can probably talk more to in the U.S., but it could be family reunification, it could be medical issues, it could be other issues as well. However, I think one thing that I would like to leave with is I think it's very important to not assume what their needs are. They may have PTSD, they may have other trafficking-related issues that they deal with, but it's important to listen to them and say, "What are the top three things that you want immediately and then we can work on the other stuff later?" and not impose what we may think the solutions are.

Senator CANTWELL. Is there a supply chain of medical help that's available to these individuals?

Mr. GOSWAMI. Issara does rely on the network of local nonprofits and some government-backed institutions in the Thailand area to provide medical assistance. And Thai law also requires that if a migrant is, quote/unquote, escaped from a situation of slavery or trafficking, they are entitled to certain medical benefits as well. They, as you can imagine, including in this country, they are far and few in between and not enough to meet all the needs of—

Senator CANTWELL. So is that something that we should, I don't know what the right word is, try to make sure that there is an awareness of the availability of services?

Mr. GOSWAMI. I think definitely an awareness, but also more resources for services in general.

Senator CANTWELL. OK. All right. Thank you so much.

Thank you, Mr. Chairman.

The CHAIRMAN. Thank you, Senator Cantwell.

Senator Capito.

**STATEMENT OF HON. SHELLEY MOORE CAPITO,
U.S. SENATOR FROM WEST VIRGINIA**

Senator CAPITO. Thank you, Mr. Chairman. And thank the ranking member as well. And thank all of you for your dedication to a really tough issue.

You know, I've been in Congress now for a fairly long time, and we've done quite a bit, I think, to raise awareness, to focus more resources, but we couldn't do it without help that we're receiving from folks like you.

I'm from a rural state, and I thought, well, I'm going to have a community meeting on human trafficking, thinking I'll probably get 10 people to come. But it's an interesting topic, we were doing something on the floor of the House at the time. I was amazed at the number of people and the different and divergent folks who waited from law enforcement and social agencies, and youth. A woman came and testified about her daughter who had been sexually trafficked for years and the ups-and-downs of her life.

So my first question is, you know, you assume this is happening in big cities, but it's happening in rural America. And I'm wondering, Ms. Sorensen, what is your perspective in terms of what you're seeing in the data and anecdotally in terms of rural America versus more urban areas?

Ms. SORENSEN. It's going to be dependent on what part of the country we're talking about rurally.

Senator CAPITO. Yes.

Ms. SORENSEN. Obviously, different kinds of agriculture institutions, different kinds of labor historically or otherwise, being present in certain rural locations, but I would say that generally speaking the awareness is much lower. And so when we are looking at rural communities, we are just not getting the kinds of responses that we are from urban communities. That's a major concern to us, that we don't have that level of engagement—I mean, it sounds like perhaps the meeting you held was very different, which is wonderful, but that's not consistently true.

We certainly don't have the resources available—

Senator CAPITO. Right.

Ms. SORENSEN.—for victims in rural locations in the same way that we do in urban locations. That's most concerning particularly when we talk about males being trafficked, and we can't rely on maybe domestic violence shelters the way we would for women or for girls. It's also going to be concerning when there hasn't been some level of intimate abuse because then there is also just a dearth of housing services in particular.

We also are concerned about the lack of transportation generally. One of the things that I noted in the written testimony is that while we have a lot of awareness with transportation partners and with the Department of Transportation itself, in rural communities even when we do identify a shelter we are unable to get someone to the location. So we end up relying on local police or on donations to get someone to that critical resource.

Senator CAPITO. Right.

Ms. SORENSEN. So it's a different issue. We actually have a staff member whose role right now is focused on building awareness and integrating the understanding of what the hotline can provide with

rural communities in particular. And we have another staff member focusing on the American Indian/Alaska Native communities. And in combination, we're hoping to address some of the issues that we see across those two vulnerable populations.

Senator CAPITO. Well, I mean, I would love to work with you on that issue. I think what was mentioned earlier about training is absolutely critical, and it is more difficult. A lot of these smaller areas cycle through their law enforcement folks rather quickly, and they've got a lot of different issues.

One of the things that—I have two kind of other questions, and anybody can jump in here—the relationship between trafficking and drugs and the drug trade and drugs being used to further enslave people or to be used as mules or whatever, because we have a huge opioid crisis going across this country, and heroin. So that's my first question.

The other, which is probably—so let's start with drugs because I don't think I'm going to have a chance to get the other. The other one I was going to ask about was language barriers. Obviously, that's got to be a big issue as well.

So on the drug issue, Mr. Lares.

Mr. LARES. Yes. Nine out of ten of our survivors and/or victims are addicted to some kind of drug. And in Florida we're seeing just a skyrocket in heroin and meth, some of the two drugs. So they all have to—we have partnered with detox centers to get them in detox.

Senator CAPITO. But nine out of ten.

Mr. LARES. Nine out of ten.

Senator CAPITO. That's a pretty stunning number, I think.

Mr. LARES. Very close relationship to the traffickers, whether they're already addicted or getting them addicted.

Senator CAPITO. And then further grabbing hold of them that way.

Mr. LARES. Yes, ma'am. We have a case in Orlando where a 14-year-old girl was given drugs, her and her sister, and she ended up dying after being in the ring for 8 days, unfortunately 14 years old.

Senator CAPITO. Oh.

Mr. LARES. And so they are definitely using the drugs and the epidemic that's occurring across our Nation as a part of the entrapment.

Senator CAPITO. Does anybody else have a comment?

Yes.

Ms. SORENSEN. I want to send you data that we ran that I do not have with me today that was looking specifically at the last 2 years and the involvement of opioids, and it is significant. And so it is worth further attention, and I will make that available for the record and follow up with you.

[The information referred to follows:]

Here is some National Human Trafficking Hotline data that we ran for 2015 and 2016 that highlights the cases of human trafficking that involves substance abuse. Almost 20 percent of all potential victims reported to the National Human Trafficking Hotline in 2015 and 2016 were said to have some relationship to substance abuse. Of the potential victims who had a connection to substance abuse 109 (5 percent) had a caretaker with a substance abuse issue, 664 (33 percent) had a substance abuse issue prior to the potential trafficking and twenty of these individuals were recruited into their trafficking situation directly from drug rehabilitation cen-

ters. Additionally, 1,594 (79 percent) had drug abuse either induced or exploited as a means of force, fraud, and coercion in their situation. Please also note that the numbers I've just shared are non-cumulative as individuals could have experienced more than one of the above situations.

Finally, a connection to substance abuse is seen most frequently in sex trafficking and sex and labor trafficking cases. 527 (28 percent) of the potential victims about whom Polaris had information on age and who had a connection to substance abuse were minors. At least 66 additional potential victims were minors at the time their trafficking started.

Senator CAPITO. Thank you. All right. Thank you.

Yes.

Mr. GOSWAMI. Thank you, Senator. Just to say that as you can imagine, working on a fishing boat off the Thai coast, it's hard work, it's arduous work, and oftentimes we have had quite a few cases where the workers are fed, knowingly or unknowingly, amphetamines to keep them awake so they can work for 18- to 20-hour shifts.

Senator CAPITO. Yes. I'm thinking about that movie I saw, Captain—what was that movie? The Somalis were taking some kind of drug. Remember? Well, never mind, but they were on a boat as well. I guess that's the similarities.

Anyway, thank you.

The CHAIRMAN. This Senator from West Virginia is going to move to other places or something else.

[Laughter.]

Senator CAPITO. Tom Hanks was in it.

The CHAIRMAN. Oh, yes. OK. That one. I know that one.

[Laughter.]

The CHAIRMAN. Thank you, Senator Capito.

Senator Sullivan is up next.

**STATEMENT OF HON. DAN SULLIVAN,
U.S. SENATOR FROM ALASKA**

Senator SULLIVAN. Thank you, Mr. Chairman. And thank you for holding this hearing. And I appreciate the witnesses' focus on this really important issue, but it's a very difficult issue. I know I'm not going to ask Senator Cortez Masto another question, but her line of questioning I think was actually really important with regard to state-Federal cooperation. And 2 years ago, in the Victims of Trafficking Act, we were able to include an amendment that really forced the Federal Government to be more forthcoming on cooperating with state AGs and local district attorneys in prosecuting Mann Act violations. And I'm sure you're all familiar with the Mann Act. That's the Federal law that prevents essentially trafficking of, you know, young people across state lines. But it's hard to bring an action as a state AG.

Even though you have all talked about the lack of resources, so this was a part of this bill, and we'd like to work with all of you to get the word out more that state AGs, district attorneys, actually have a lot more authority under the new law that we passed 2 years ago to prosecute Mann Act cases even though it's a Federal crime. And this is something that I think a lot of us could do a better job of highlighting to make sure our state AGs and district attorneys know that we have those resources now. And we'd love to work with you on getting the word out because I think it's a great

way to go after some of these crimes and spread the resources when, as you've testified, we're all kind of hurting on the resources. So I would look forward to working with all of you on that.

Let me ask another question. It's really a follow-on from Senator Capito's question when you talk about vulnerable populations. She mentioned rural victims, and I'm very interested in that, being from Alaska, but also homeless victims and homeless youth.

My wife works at Covenant House in Anchorage, and you may be familiar, and I would like to submit them for the record, Mr. Chairman, a study, a ten-city study, by Loyola University and Covenant House on labor and sex trafficking among homeless youth.

The CHAIRMAN. Without objection.

[The information referred to follows:]

Labor and Sex Trafficking Among Homeless Youth

A Ten-City Study
Executive Summary

Laura T. Murphy



This study provides a detailed account of labor and sexual exploitation experienced by homeless youth in Covenant House's care in ten cities.



Mission Statements



Loyola University New Orleans

Loyola University New Orleans, a Jesuit and Catholic institution of higher education, welcomes students of diverse backgrounds and prepares them to lead meaningful lives with and for others; to pursue truth, wisdom, and virtue; and to work for a more just world. Inspired by Ignatius of Loyola's vision of finding God in all things, the university is grounded in the liberal arts and sciences, while also offering opportunities for professional studies in undergraduate and selected graduate programs. Through teaching, research, creative activities, and service, the faculty, in cooperation with the staff, strives to educate the whole student and to benefit the larger community.



Modern Slavery Research Project

Loyola University's Modern Slavery Research Project works to make escape possible for victims of human trafficking in Louisiana, the U.S., and internationally through survivor-centered, data-driven, community-based research that better serves survivors and supports advocates who are on the front lines of identifying and assisting those held in modern slavery.

Executive Summary

Covenant House International is the largest, primarily privately-funded charity in the Americas offering housing, outreach, and support services to homeless youth. Each year, the organization helps nearly 47,000 youth in 30 cities in six countries.

Human trafficking — the exploitation of a person's labor through force, fraud, or coercion — is a crime whose victims tend to be society's most vulnerable. People who are homeless, lack a support system, or are desperate for work are susceptible to the promises of people who would exploit them for labor and for sex. Recently, homeless youth providers in the United States and Canada have become aware that their clients are particularly at risk of trafficking, and research has begun to uncover the extent and contours of the problem within that community.

Between February 2014 and June 2016, researchers from Loyola University New Orleans's Modern Slavery Research Project (MSRP) were invited by Covenant House International and ten of their individual sites in the United States and Canada to serve as external experts to study the prevalence and nature of human trafficking among homeless youth aged 17 to 25. MSRP researchers interviewed 641 homeless and runaway youth who access services through Covenant House's network of shelters, transitional living and apartment programs, and drop-in centers. Youth were invited to participate, on a voluntary basis, in a point-in-time study about work experience. Semi-structured interviews were conducted using the Human Trafficking Interview and Assessment Measure (HTIAM-14) to assess whether youth had been trafficked for sex or labor in their lifetimes.

Youth were interviewed in the following cities:

Anchorage, Alaska
Atlanta, Georgia
Detroit, Michigan
Fort Lauderdale, Florida
Los Angeles, California
New Orleans, Louisiana
Oakland, California
St. Louis, Missouri
Toronto, Ontario
Vancouver, British Columbia

Key Findings

Human Trafficking

- Of the 641 youth we interviewed at Covenant House sites around the United States and Canada, nearly one in five (19% or 124) were identified as victims of some form of human trafficking, following the legal definition outlined by the U.S. Victims of Trafficking and Violence Protection Act (later renamed the Trafficking Victims Protection Act (TVPA)).
- More than 14% (92) of the total population had been trafficked for sex, while 8% (52) had been trafficked for other forced labor. 3% (22) were trafficked for both sex and labor.
- Ninety-one percent (91%) of the respondents reported being approached by someone who was offering an opportunity for income that was too good to be true. This included situations that turned into trafficking as well as other offers for commercial sexual exchanges, fraudulent commission-based sales, credit card scams, stolen phone sales, and check fraud.

Sex Trafficking and Commercial Sex

- 14% (92) were victims of sex trafficking, applying the U.S. federal definition of trafficking.
- Of the 92 youth who were identified as sex trafficking victims within the study, nearly 58% (53) were in situations of force, fraud, or coercion characteristic of human trafficking under the U.S. federal definition.
- 42% of youth who were identified as sex trafficking victims were minors involved in the sale of commercial sex and survival sex but were not forced by a third party to do so.
- 20% (49) of cisgender women interviewed reported experiences consistent with the definition of sex trafficking, as did 11% (40) of cisgender men.
- 24% (30) of LGBTQ youth were trafficked for sex, compared to 12% of non-LGBTQ youth.
- 19% (121) of the youth we interviewed turned to survival sex at some difficult point in their lives.
- 30% (193) of all youth interviewed had engaged in some way in the sex trade at some point in their lifetimes; 24% (93) of the young men, 38% (93) of the young women, whether that was through situations of force, survival sex, or commercial sexual work as adults. (7 transgender youth were engaged in the sex trade, but the sample size was not large enough to produce significant findings.)
- The median age of entry into trading sex was 18, while the median age for those who were considered trafficked was 16.



Labor Trafficking

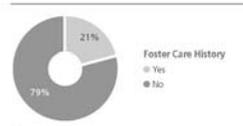
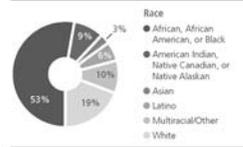
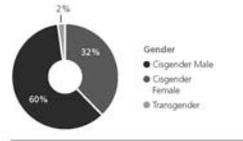
- 8% of respondents were found to have been trafficked for labor.
- Situations of forced labor included youth who were forced to work in factories, domestic labor situations, agriculture, international drug smuggling, sex-trade-related labor, and commission-based sales.
- The vast majority (81%) of labor trafficking cases reported in this study were instances of forced drug dealing. Nearly 7% (42) of all youth interviewed had been forced into working in the drug trade.
- Forced drug dealing occurred through familial and cultural coercion as well as through the violence of suppliers and gangs.

How are homeless youth affected?

Homeless youth are vulnerable to both sex and labor trafficking because they tend to experience a higher rate of the primary risk factors to trafficking: poverty, unemployment, a history of sexual abuse, and a history of mental health issues. If they have families who are involved in the commercial sex trade or gangs, their risk is even higher. Homeless youth indicated that they struggled to find paid work, affordable housing, and support systems that would help them access basic necessities. They had experienced discrimination in their jobs and in housing. A confluence of factors made the homeless youth we interviewed vulnerable to both sex and labor traffickers who preyed on their need. It also made them more likely to turn to the sex trade for survival.

Participant Characteristics and Prevalence

Participant Characteristics Total Participants: 641



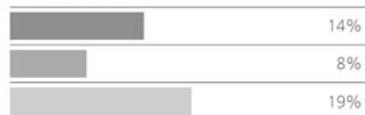
Age

17 year olds	1
18 year olds	79
19 year olds	134
20 year olds	125
21 year olds	117
22 year olds	85
23 year olds	58
24 year olds	25
25 year olds	3

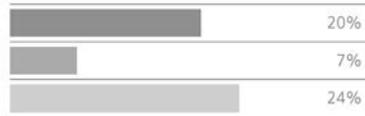
Human Trafficking Prevalence Rates

Sex Trafficking Labor Trafficking Any Trafficking

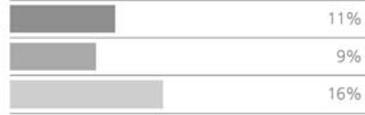
All Participants (641)



Young Women (243)



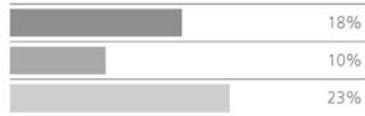
Young Men (383)



LGBTQ Youth (123)



Youth with Foster Care History (137)



Economics: For the vast majority of youth, economic factors made them most vulnerable to traffickers and unwanted engagement in the sex trade. They reported that they often found themselves desperate for work and that people took advantage of their need. Ninety-one percent (91%) of respondents reported being approached by strangers or acquaintances who offered lucrative work opportunities that turned out to be fraudulent work situations, scams, pandering, or sex trafficking. While some were resilient and walked away from these offers, many of the youth who were trafficked for sex and labor were recruited in this way. Others felt forced to turn to trading sex because they could not find legitimate work. Eighty-four percent (84%) of youth who reported engaging in the sex trade without a third-party controller did so because of economic need.

Housing: Youth reported that their fear of sleeping on the streets left them vulnerable to sex and labor traffickers and to survival sex. Securing housing was a primary concern for the vast majority of the youth we interviewed. Sixty-eight percent (68%) of the youth who had either been trafficked or engaged in survival sex or commercial sex had done so while homeless. Nineteen percent (19%) of all youth interviewed had engaged in survival sex solely so that they could access housing or food. This problem is even starker among those who are not sheltered. The incidence of trafficking among drop-in youth—sometimes called “street youth”—was high relative to the sheltered cohort: 24% were trafficked for sex, 13% for labor. Forty-one percent (41%) of interviewed drop-in youth had engaged in the sex trade in some way at some point in their lives. One-third (33%) of them had engaged in survival sex as either adults or minors. Many of the trafficked youth who were accessing Covenant House’s shelter programs said they saw the shelters as safe havens from their traffickers.

Work: The youth we interviewed indicated that they encountered people who took advantage of them when they were searching for work. A lack of job opportunities converged with a lack of computer literacy and job skills to lead to vulnerability. Many youth pursued job advertisements that turned out to be fraudulent. They sought training on how to identify a safe job and additional job skills training programs to help them avoid labor traffickers, sex traffickers, and other exploitative labor situations.

Gender: One in five of all cisgender women and one in ten of all cisgender men had experienced a situation that was considered sex trafficking. While cisgender women were more likely to be trafficked and to engage in the sex trade, cisgender men were more likely to

68% of the youth who had either been trafficked or engaged in survival sex or commercial sex had done so while homeless.

be trafficked than many people might expect. Eleven percent (11%) of cisgender men had been trafficked, and a total of 24% of them had engaged in at least one commercial sexual exchange at some point in their lives. Nearly one in ten men who identified as heterosexual had been trafficked, while more than one in five (21%) LGBTQ men had been trafficked. Despite this, heterosexual cisgender male youth reported that they typically had not been asked about engaging in the sex trade when interacting with social service providers and were not typically offered services for trafficking or sexual exploitation.

Sexuality: LGBTQ youth were disproportionately affected by sex trafficking and significantly more reported engaging in the sex trade. Though LGBTQ youth accounted for 19% of the respondents interviewed, they accounted for 36% of the sex trafficking victims and 36% of those who engaged in the sex trade. Half of the LGBTQ youth had engaged in the sex trade in some way during their lifetimes. LGBTQ youth were significantly more likely to be sex-trafficked than their straight counterparts.

Aging Out: Aging out of the foster care system made youth vulnerable to traffickers and to engagement in the sex trade. The median age of entry into trading sex for the youth we interviewed was 18 years old, and for those who were sex trafficked it was 16. Youth reported becoming homeless as a result of leaving foster care, and they indicated that homelessness resulted in vulnerability to the sex trade and sex trafficking. Though they constituted 21% (137) of the sample, youth who had a history of involvement in the foster system accounted for 29% (25) of all sex trafficking victims, 27% (49) of all youth engaged in the sex trade, and 26% (13) of all youth who were labor trafficked. Youth between the ages of 17 and 19 need special attention because of their unique vulnerabilities.

Recommendations

For Practice

Runaway and homeless youth shelters and programs should be equipped to meet the needs of trafficked youth because they are able to address the root economic and societal problems that make youth vulnerable to exploitation. With programs directly responsive to the heightened needs of trafficking victims, runaway and homeless youth shelters can effectively help trafficking survivors and prevent other homeless youth from being exploited. We recommend a four-pronged approach that includes prevention, outreach, confidential and inclusive identification, and specialized interventions.

Prevention efforts that focus on job search and job skills programs, housing opportunities, and healthy sexuality/relationships will increase youth resilience to traffickers and exploitation.

Outreach programs and advertising for services should target locations where youth are being approached by those who would exploit them: on social media and online job sites, at bus stops and transportation stations, and at government assistance offices.

Confidential and inclusive identification strategies should be employed by all youth-serving organizations to increase the likelihood that youth will disclose a situation of trafficking and, therefore, provide greater access to specialized services and care. Including men, LGBTQ, and foster care-related vulnerabilities in screening protocols should be standard practice.

Specialized Interventions might include anti-trafficking orientation and drop-in programs, trauma-informed counseling, harm reduction training, and victim relocation networks.

91%

of youth reported being offered lucrative work opportunities that turned out to be fraudulent, scams, or sex trafficking.

For Policy

Social service providers cannot protect young people from labor trafficking and commercial sexual exploitation or effectively help them overcome related traumas without significant support. Legislators must play a role in ensuring that our youth are protected from trafficking. The following legislative changes could assist us in identifying and helping more trafficking survivors.

- U.S. Congress should pass the Runaway and Homeless Youth and Trafficking Prevention Act, which provides much-needed funding for services to prevent and address trafficking among homeless and runaway youth populations.
- Dedicated funding should be allocated for additional shelters and shelter beds equipped with wraparound and specialized services to serve survivors of trafficking and exploitation in both the United States and Canada.
- All U.S. states should pass comprehensive "Safe Harbor" laws that allow young trafficking survivors to be treated as victims of a crime rather than as criminals.
- Criminal justice reform in the United States and Canada should take into account the context in which youth engage in the drug trade and exclude victims of forced labor from prosecution.
- Specialized human trafficking training for law enforcement should be required and funded in every state and province and should include training on appropriate interview techniques as well as the variety of forms trafficking takes.
- Legislators need to address the housing and security crisis experienced by youth aging out of foster care.
- Every U.S. state should raise the age for aging out of foster care to 21.

For questions about the content of this report, please contact **Dr. Laura Murphy**, Modern Slavery Research Project, Loyola University New Orleans, at lmurphy@loyno.edu

For questions about Covenant House International's work, please contact **David Howard** at dhoward@covenanthouse.org

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Senator SULLIVAN. And this is just a recent *New York Times* article. Also I would like to submit for the record “Homeless Youth at High Risk of Human Trafficking.” And in Anchorage, 28 percent of homeless youth were victims of human trafficking, which was a shocking number for our community. A lot of people weren’t aware of that.

[The article referred to follows:]

New York Times—April 17, 2017 6:21 pm

HOMELESS YOUTH AT HIGH RISK OF HUMAN TRAFFICKING

By Tariro Mzezewa

For decades, one set of activists and legislators have fought to end human trafficking, while a different set have worked tirelessly to try to end homelessness. Activists and legislators have rarely teamed up to fight the two issues simultaneously.

Now a new study suggests that the key to ending trafficking of young people is to eradicate youth homelessness first.

“The vulnerability children experience when they are alone, hungry and without shelter on the streets makes them particularly susceptible to trafficking,” said Kevin Ryan, president and chief executive of Covenant House, a shelter for homeless teenagers and young adults across the country.

The study was released on Monday by *Covenant House*, as well as the Field Center for Children’s Policy, Practice & Research at the University of Pennsylvania and Loyola University Modern Slavery Research Project in New Orleans.

After interviewing 911 homeless young people across 13 cities in the United States and Canada, researchers concluded that 56 percent of homeless transgender youth had been involved in the sex trade in some way, while 40 percent of homeless young women and 25 percent of young men were. About 27 percent of L.G.B.T youth reported experiences consistent with the U.S. Federal definition of sex trafficking.

Sex trafficking is the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act is a minor.

“The vulnerability children experience when they are alone, hungry and without shelter on the streets makes them particularly susceptible to trafficking,” said Ryan.

The researchers found that of those interviewed, nearly one-fifth of homeless youth in the United States and Canada are victims of human trafficking, including those trafficked for sex, labor, or both. Some 20 percent were victims of human trafficking.

For Naomi, who was trafficked as a teenager, learning that so many young homeless people are often exploited is no surprise.

In 2008, at the age of 16, Naomi, whose real name has been changed, left Haverford, Pa., to spend a week with a friend in New York City. Upon arriving in the city, she was trafficked. Over the next four years, she was bought by one pimp from another, sold for sex in New York and New Jersey, forced to have sex with strangers several times a week and eventually arrested for prostitution.

While trapped in a Brooklyn apartment, owned by a pimp who locked her in a closet when he left the house, Naomi tried to plan several escapes, but always ended up choosing to stay with the man who abused her because she was scared of ending up homeless and alone.

“The fear of having nowhere to go, of being homeless was very real,” she said. “He would say my family wasn’t looking for me, that they didn’t care where I was and no one would help me if I left.”

Naomi was mandated by the court to attend therapy sessions at Girls Educational and Mentoring Services, an organization that helps girls and young women who have been involved in prostitution. The organization connected her with Covenant House.

In March, a month after *vowing to end* human trafficking, President Donald Trump proposed, through his budget, eliminating the Interagency Council on Homelessness. His move was *widely criticized* by anti-poverty advocates, who believe that ending poverty is central to fighting trafficking.

“One of the ways we will end criminal exploitation of children and youth is to make sure there is a robust safety net for homeless issues,” said Ryan. “To end human trafficking, we must end youth homelessness.”

Senator SULLIVAN. What are the things—and I'll just open this up to everybody—what are the things that we can do and we can focus on working with groups like yours to help address these populations, whether they're from rural states like West Virginia and Alaska or whether it's the homeless youth problem that seem particularly vulnerable to human trafficking? What are the things that we should be trying to do here working with you or working with states, like we've been talking about earlier? Yes, I'll open that up to all of you.

Ms. SORENSEN. Thank you for the question. Your wife works at Covenant House, what a wonderful institution with great research, so hats off to her work.

Senator SULLIVAN. Yes, they're great, very passionate.

Ms. SORENSEN. Homelessness is indeed one of the greatest drivers that we see. I'd love to run stats for you specifically looking at minors and then looking at young adults so that we have some sort of data differentiation there, but I would like to give that to you. I don't have that with me now.

[The information referred to follows:]

From January 1, 2015 to June 30, 2017 there were over 1,200 potential victims of human trafficking reported to the hotline who were runaway or homeless youth or others who experienced unstable housing prior to the start of their trafficking situation. The age breakdown of these individuals when Polaris first learned of their situation is as follows: 614 minors; 262 Young adults (18–26); 156 older adults; and 226 individuals of unknown age.

Ms. SORENSEN. But it is certainly something that we see all of the time. It's either something that—whether a parent is insecure and that makes the minor at risk, or if it's the minor themselves.

We also see tremendous intersection with the community that identifies as Lesbian, Gay, Bisexual, or Transgender, and when these risk factors are combined, we have cause for deep concern.

One of the policy areas that we think needs immediate attention is the reauthorization of the Runaway and Homeless Youth and Trafficking Prevention Act. That has been lingering for some time in front of the Senate and the House. But it does provide the majority of resources for youth either at risk to homelessness or who are already homeless, including resources for counselors and other school staff who can provide guidance and assistance to the youth who are still attending school as well as street outreach and other kinds of services.

So I think we're looking ideally at, how do we prevent that homelessness in the first place?

Senator SULLIVAN. Yes.

Ms. SORENSEN. We need to look at revamping the way that we deal with families. How do we keep them together? How do we provide resources to them so that they're not at risk of homelessness in the first place? But then once that's happened and that minor is still engaging with community resources, how do we keep them safe?

So I think there are a couple of things, but RHYTPA, I would deeply advocate for its reauthorization.

Senator SULLIVAN. Great. Anyone else on that topic?

Mr. LARES. In Orlando, we're also partnered with the Covenant House there. They've been a great partner in taking victims of

human trafficking. The majority, Senator, of our victims are homeless, and so as she had also stated, the LGBT community is super at risk. Also——

Senator SULLIVAN. Why is that? I mean, I know that was in some of the studies. But what makes them more at risk than other populations?

Mr. LARES. I believe part of it is there is no housing or shelter for boys who are transgender, and so they repeatedly end up in forced pornography, these different sex rings. It starts a lot of times as survival sex because maybe they came out and were rejected by family or the community. And so this is definitely a problem, is the housing and shelter, as she had indicated, for these young people.

Senator SULLIVAN. All right. Thank you.

The CHAIRMAN. Thank you, Senator Sullivan.

Senator Young.

**STATEMENT OF HON. TODD YOUNG,
U.S. SENATOR FROM INDIANA**

Senator YOUNG. Thank you, Chairman.

Ms. Goetsch, I first want to commend you and your organization, Truckers Against Trafficking, for shining a light on this issue, doing what you can to help staunch it. I represented one of the counties in our Nation that's been worst hit by the opioid epidemic in recent years, Scott County, Indiana. There were massive HIV outbreaks. And Scott County sits along a major interstate corridor, and we fear that the transit hubs located along that corridor and other corridors can become incubators for addiction and disease and further social pathologies. And so I just wanted to publicly commend you for your work.

Ms. Sorensen, you've spoken to, in your testimony and elsewhere, the importance of a data-driven approach. In fact, that's what Polaris offers, those who are trying to make a difference here, identifying trends, working to stem the flow of these appalling crimes through identification of those trends. There's clearly an importance of collecting the relevant data, of standardizing that data, of disseminating it to decisionmakers and analysts and scholars who are doing their best to try and staunch this human trafficking industry.

Given that Polaris is on the forefront of combatting this crime and this challenge, how can Congress best assist groups like Polaris in this data-driven approach through improved data collection or perhaps other measures?

Ms. SORENSEN. Thank you for your question.

Senator YOUNG. Yes.

Ms. SORENSEN. I think this is a real area of conversation. So the Presidential—sorry—the President's Interagency Task Force has a subgroup that specifically focuses on data collection and standardization. And it has been a struggle. I think they wouldn't mind my reflecting it that way, but across Federal law enforcement agencies in the first instance is difficult. Incorporating state law enforcement agencies after that, more difficult. But also even across HHS and DOJ for the Office of Victims of Crime has been challenging.

So we hear Federal agencies pushing the mantra of standardization, but I think the more we can bring perhaps academics into that debate to help with that conversation so that it happens more quickly, so that it happens as efficiently as possible, it would always be welcomed.

We are trying to do work slightly outside of the Federal agencies as well, so we have recently embarked on a partnership with the International Organization of Migration to create something called the Counter Trafficking Data Collective, which would gather all of the data from anonymized cases from hotlines around the world to make available to scholars and academics and others who can access it privately so that we can learn more but without endangering any sort of victim through sharing too much information. I think—

Senator YOUNG. Have we gotten to the point where we're able to analyze sort of leading indicators so that we can get out in front of this problem in particular geographies or among particular identified sets of our population?

Ms. SORENSEN. I think if we collate that information, we can.

There's another idea I might put forward to you, and it's something that Senator Blumenthal introduced last Congress. It was called the Visa Transparency Anti-Trafficking Act. And it would require an annual publication of particularly the temporary work visas that are granted every year. And we know from operating the hotline, we analyzed 2015 data, and in one year, we saw that 40 percent of our labor exploitation and trafficking references were from people on temporary work visas. So we see this massive correlation.

Now, if we had the information about where those populations were coming from, what industries they were being authorized to work in, what regions of the country were they going to, we might be able to better direct Department of Labor or other kinds of investigators to target their oversight in particular ways. We could also drive prevention education efforts to populations that we know are consistently migrating for certain kinds of at-risk work.

So I think there are a few ideas. One is obviously that data standardization, but it's also we have a lot of this data, we're just not necessarily using it to the best of our ability yet.

Senator YOUNG. Well, this area of data science and data analytics and so forth is something that we're increasingly becoming sophisticated at. So I would love to work with you and your organization on any improvements at the Federal level we can make, statutory, regulatory, whatever.

I just want to sort of conclude here by shining a light on the state of Indiana. As some of you are aware, our state has done some incredible path-breaking work with respect to addressing this issue, really regarded, I think, by many states as a national model. The Indiana Protection for Abused and Trafficked Human Task Force, or IPATH, has been an ongoing initiative to study the problem to come up with a way to address it across jurisdictions of government, with various other stakeholders around the state of Indiana. And it was informed in no small part by Polaris and the work you do. So thank you for that.

Mr. Chairman.

The CHAIRMAN. Thank you, Senator Young.

Well, let me ask one last question maybe for the panel, and then we'll wrap up and let you all go. But your testimony I think really highlights the significant impacts that awareness can have and make when it comes to combatting human trafficking. So in your view, how can the average person be more vigilant to identify human trafficking? And what can they do or what can we all do to help? It's kind of an open question for whoever would like to respond to that.

Ms. GOETSCH. That's a great question. You know, at the heart of our work is turning those once passive populations, which are made up of individuals, into a disruptive force. And so I would encourage people to do those small acts of resistance against, you know, the bad and the evil around us, whether that's becoming more informed and aware about human trafficking, and then recognizing places in your everyday life that you can activate that information, whether you're a taxicab driver, a bus driver, a truck-driver, a hotel worker.

All of us, you know, as you said in your opening remarks, it's a crime that often happens in the open if we have eyes to see what these victims are going through and what some of those indicators are.

Mr. LARES. One of the things that we're doing is encouraging not just my agency, Florida Abolitionist, but all the task forces in Florida, to wherever they present, we have everyone put in right on their smartphone, it's part of the presentation, the Polaris hotline. And so literally thousands of people have the hotline, and we say you can call, you can be anonymous, but please make the call. If you see something, say something, and I believe many in Florida are responding to that. It's very practical.

The CHAIRMAN. Anyone else?

Mr. GOSWAMI. A couple of years ago when we had a lot of new reports around slavery in the seafood sector in Southeast Asia, we realized that a lot of this seafood, this tainted seafood, is coming into both consumption for Americans but also their pets. The first thing I did when we saw those news reports is I called the pet company that we buy our pet food from, and they immediately responded with some proactive steps. They told me about the proactive steps that they take.

In that vein, although we do have these data challenges, we do know enough about where slavery or human trafficking is impacting the clothes that we buy and the food that we eat, and I think the more that the public can both encourage companies that they buy from to implement ethical sourcing measures and hold them accountable to that, the better it is for the rest of us who are working with them on the ground to make these changes.

The CHAIRMAN. All right. Thank you.

Ms. Sorensen.

Ms. SORENSEN. I would just echo my colleagues, who are providing excellent suggestions. I think there are also tools that in particular in the private sector and the Federal Government have already produced. I want to draw attention to the International Labor Affairs Bureau's Sweat and Toil tool, which people can download, to identify at-risk products and materials that they

might think twice about buying. And it's a phone app. So when people go to the grocery store and they know that their such-and-such produce is from such-and-such country, they might reconsider because we know that that actually might be made with forced labor. So there are easy tools like that.

The people who run companies, people who are employees of companies, can check Responsiblesourcingtool.org and figure out where common supply chain problems might be happening within their companies and take action. That can certainly be true of investors as well. So as investors, if we have retirement accounts, we all have some level of agency to demand change there.

So I think the more we start to vision ourselves as actors in this—I think this crime unfortunately is one that happens not just because there are bad actors, but because we are ourselves exist in such complex supply chains and we are so interdependent on each other's global markets. So once we can start to change that view, we have a chance of changing this crime.

The CHAIRMAN. Well, thank you all very much. Like I said earlier, I think that this is an issue which, at least in this country, our goal ought to be to completely eradicate it. And I know there are other areas of the world where it happens, and we need to be combatting those in every way that we can, too, but we want to use every tool at our disposal.

And this Committee's jurisdiction, of course, is the transportation sector, which plays into this, as we heard today. We have technology under our Committee's jurisdiction. And so there are other committees also that share that jurisdiction within the Senate, but I certainly want to give the focus that's necessary, the attention that's necessary from our Committee as well to ensure that we're taking all steps possible. And as I mentioned, there will be a couple of bills that hopefully on our next markup we'll include that will address this issue more specifically.

But your testimony has been outstanding. Thank you so much, not only for that, but for the great work that you and your organizations are already doing. These are heinous crimes, and it's hard to imagine sometimes what—that this is a blight on humanity, and we need to do everything we can to stop it in its tracks.

So thank you for what you're doing. Keep up the good fight. We will keep the hearing record open for a couple of weeks in case Members have questions, and if they submit questions for the record, we would ask that you respond to those as quickly as you can.

Thank you. And this hearing is adjourned.

[Whereupon, at 11:46 a.m., the hearing was adjourned.]

A P P E N D I X

RESPONSE TO WRITTEN QUESTIONS SUBMITTED BY HON. DAN SULLIVAN TO KEELI SORENSON

Question 1. I understand you grade each state based on the legal framework each state has created to punish traffickers and support survivors. The last report appears to be from 2014, in which Alaska ranked in Tier 1, illustrating that the State has passed significant laws to combat human trafficking. Will you be doing an updated report, and if so, do you have any information as to what Alaska's grade be? What would the Nation's grade be looking at our Federal framework of laws regarding trafficking? Do you have suggestions for improving the Nation's grade?

Answer. Polaris completed our final State Ratings Report series in 2014. At that time, Alaska had received a Tier 2 rating, indicating concrete areas where the state could improve anti-trafficking laws. The 2014 state report pointed to the following recommendations:

- Renew appropriations for law enforcement training.
- Enact the creation of a state-wide human trafficking task force
- Require the posting of a human trafficking hotline
- Enact laws enabling victims to vacate convictions for crimes they were forced to commit as a result of their trafficking experience
- Provide support for victim assistance
- Pass legislation that requires law enforcement to treat minors engaged in commercial sex as victims instead of criminalizing them

While Polaris does not engage in rating the whole of the United States on its anti-trafficking commitment, we would recommend that the U.S. Congress take steps to address critical gaps in the law. We would recommend that the U.S. enact laws that enable victims to vacate convictions for crimes they were forced to commit as a result of their trafficking experience, and take steps to protect children who have been engaged in commercial sex, and ensure robust funding for victim services. Additionally, we believe the government should take steps to develop a prevalence methodology to understand the number of victims of human trafficking in the United States at any given time.

The United States also lacks sufficient laws regulating foreign labor recruiters. Every year, hundreds of thousands of people coming to work in the U.S. on visas are put at risk of labor trafficking by labor recruiters who prey on the hopes of workers by charging them brokerage exorbitant fees and deceive workers about the conditions and terms of their work. The U.S. lacks robust legal safeguards to ensure that recruiters cannot abuse structural failures in U.S. visa programs and exploit already vulnerable workers. Greater legislative action is required to hold exploitative recruiters responsible for their actions. Congress should pass legislation which includes provisions requiring foreign labor contractors to disclose honest information about the terms and conditions of work in the United States to workers; prevents foreign labor recruiters from charging workers fees related to recruitment activities; requires employers to use recruiters who have registered (for a fee) with the Federal Government (thereby indicating compliance with the aforementioned conditions); and ensures that foreign labor recruiters are subject to criminal, civil and administrative penalties if they violate the aforementioned provisions.

Question 2. How many hotline calls, on average, do you receive from Alaska on a monthly or annual basis?

Answer. Our call volume increases at a relatively rapid pace every month. In calendar year 2016, the National Human Trafficking Hotline received 91 substantive calls, which is almost double what it received in calendar year 2015. While the call volume by month varies quite significantly, the highest call volume months for Alaska in 2016 were (in order) December, August & October (tied), and March.

RESPONSE TO WRITTEN QUESTION SUBMITTED BY HON. BILL NELSON TO
KEELI SORENSEN

Trafficking in Commercial Aviation. Ms. Sorensen, another area where we see a substantial amount of human trafficking is in the commercial aviation area. In last year's FAA extension bill, there was a provision that sought additional training for flight attendants to recognize and report suspected incidents of human trafficking.

Question. Do you think this additional training is helpful and is there anything else we should be doing in this area?

Answer. Training for commercial flight attendants and other airline personnel is critical. We know that victims, whether foreign national or U.S. citizen, use commercial flights while in their trafficking situations and that training efforts can help staff to identify and assist victims safely. The National Human Trafficking Hotline has received calls from airline staff who have successfully assisted victims. Increasing access to this kind of training is important. I'd recommend seeking additional advice on ways to improve training efforts from Airline Ambassadors International, an organization made up of airline industry professionals who have led advocacy on human trafficking awareness since first identifying human trafficking on flights in 2009.

RESPONSE TO WRITTEN QUESTION SUBMITTED BY HON. RICHARD BLUMENTHAL TO
KEELI SORENSEN

The State Department Trafficking in Persons report from June 2017 showed that labor trafficking prosecutions dropped to just 5 percent and labor trafficking convictions dropped to 3 percent of overall human trafficking cases in the United States.

Question. Mr. Goswami and Ms. Sorensen, with the Trafficking Victims Protection Act up for reauthorization in September, what can the U.S. Government do to incentivize more accountability in labor trafficking cases?

Answer. Polaris has become increasingly concerned about the steady decline of labor trafficking prosecutions by the Department of Justice (DOJ), which has been happening since 2009. In order to improve these efforts, we believe that the U.S. congress needs to direct additional funds to the DOJ's Civil Rights Division, Human Trafficking Prosecution Unit with specific instruction to designate staff time and attention to the pursuit of labor trafficking cases. It is well known that labor trafficking cases can require more intensive resources than sex trafficking cases, often necessitating unique coordination among law enforcement partners. Additional funding should help HTPU better undertake these lengthy investigations.

RESPONSE TO WRITTEN QUESTIONS SUBMITTED BY HON. CATHERINE CORTEZ MASTO
TO KEELI SORENSEN

Question 1. The most recent State Department Trafficking in Persons report showed that labor trafficking prosecutions dropped to just 7 percent and labor trafficking convictions dropped to 2 percent of overall human trafficking cases in the United States. With the TVPA up for reauthorization in September, what can the U.S. Government do to incentivize more accountability in labor trafficking cases? Are there tools that would help identify labor trafficking cases?

Answer. Please see answer to the question above.

Question 2. A 2014 GAO report identified the failure to define recruitment fees as a primary challenge to the implementation and enforcement of the anti-trafficking procurement rules. I understand the Office of Federal Procurement policy is expected to come out with a revised rule that defines recruitment soon. Can you explain how recruitment fees are used and how they lead to various abuses related to trafficking? Why is it important we define recruitment in our procurement rules?

Answer. Many foreign national guestworkers are subjected to unregulated and abusive recruitment processes before they enter the United States. In many cases, these workers are charged exorbitant recruitment fees or incur substantial travel-based debts. Applicable fees vary significantly by industry but can range anywhere from \$100 to \$20,000 depending on the country of origin, method of transportation, and site of employment in the United States, before accrued interest.

A report from the International Labor Recruitment Working Group¹ speaks to the arbitrary and capricious nature of recruitment fees:

- Migrant workers from Mexico in the Maryland crab industry pay recruiters roughly \$750 per season for all fees and expenses necessary to participate in the program, without an explanation of what these costs cover.
- Guatemalan H-2B workers pay an average of \$2,000 in travel, visa and recruitment fees to obtain employment in the forestry industry in the United States.
- Teachers recruited for employment in H-1B or J-1 visa programs pay fees ranging from \$3,000 to \$13,000 to recruiters who schedule interviews, secure visas and arrange transportation and housing.
- The J-1 students who participated in the highly publicized strike at the Hershey processing plant in Hershey, Pa., paid between \$2,000 and \$6,000 in pre-employment expenses, depending on their country of origin and recruitment agency.

Believing that they will be able to easily repay these fees once they have secured high wages and gainful employment abroad, guestworkers often borrow money from friends and family members. In many other situations, guestworkers must mortgage their homes, sell valuables, or take out loans from predatory lenders to cover their debts. It can take several months, even years, for these guestworkers to repay what they owe, especially when they are shortchanged by their employers.

Data reported through the National Human Trafficking Hotline and the BeFree Texting Helpline indicates that guestworkers charged excessive recruitment fees are especially vulnerable to debt bondage, where they are forced to work for free until their debts are repaid. Unscrupulous employers are eager to keep these workers in a state of debt servitude and in many situations, will continue to garnish their wages for unspecified debts. It is very difficult, especially for workers who are paid in cash or under the table without written documentation, to keep track of their earnings and by extension, their progress on repayment.

Economic necessity, including dependent family members back home, as well as fears of retaliation or blacklisting from employers, make many indebted guestworkers reluctant to report exploitative recruitment or employment conditions.

For many guestworker visas, recruitment processes are not regulated at all. Even for those visas that are, recruitment processes are poorly monitored and existing laws are poorly enforced. Exploitative recruiters are rarely held accountable for fraudulent behaviors, further incentivizing abuse.

Developing a comprehensive definition of recruitment fees is extremely important so that the U.S. Government can prohibit these predatory practices. Furthermore, the U.S. Government should take necessary steps to ensure that the products and services it purchases are provided by workers who have not been exploited or abused as a result of having paid recruitment fees.

Civil society has already taken steps to provide the Department of State with a comprehensive definition of recruitment fees (which can be provided upon request), the next step is implementing this definition.

RESPONSE TO WRITTEN QUESTIONS SUBMITTED BY HON. DAN SULLIVAN TO
ESTHER GOETSCH

Question 1. Due to the uniqueness of Alaska, in our supply chains we likely do not have as much interstate trucking as other states, but rather have a higher level of air freight and sea cargo. When thinking about force multiplying, is the advocacy and education work you are doing being applied or shared with other industries, such as the airlines, hotels and motels, or sea cargo shipping companies?

Answer. Currently, TAT's model is being replicated within the convenience store industry with the introduction of CSAT (Convenience Stores Against Trafficking) begun by In Our Backyard. TAT has already begun partnering with Mexico's Consejo Ciudadano in order to replicate portions of our model to the majority of transportation modes in their country. TAT also just launched BOTL (Busing on the Lookout), in order to engage the thousands of school and commercial bus drivers and bus terminal employees in our Nation around this crime. Our model is highly replicable, and we are willing to consult with other agencies and organizations inter-

¹*The American Dream Up For Sale: A Blueprint for Ending International Labor Recruitment Abuse.* The International Labor Recruitment Working Group. February, 2013 <https://fairlaborrecruitment.files.wordpress.com/2013/01/final-e-version-ilrug-report.pdf>

ested in replicating it via multiple industries. We also know that Polaris has developed training materials currently available for the hotel and motel industries.

Question 2. Are there any specific areas where there is Federal jurisdiction—such as ports, border crossings, consular officers issuing visas—that you believe need further oversight or training to identify and protect victims of trafficking?

Answer. Absolutely. All port authority agents, border patrol officers, and anyone issuing official U.S. Government documents, should be well aware of the signs of human trafficking and how *specifically* their office intersects with potential traffickers and victims. Generic training will not do here . . . what is needed is niche-specific training for each agency that takes into consideration the uniqueness of their line of employment and also provides the stakeholders with the necessary resources to assist victims they might recover. TAT highly recommends the convening of effective anti-trafficking NGOs and agency experts, from the offices mentioned, who could bring their expertise to bear in developing a focused and well-studied training curriculum, as well as a highly pragmatic and effective response protocol.

RESPONSE TO WRITTEN QUESTIONS SUBMITTED BY HON. BILL NELSON TO
ESTHER GOETSCH

Ms. Goetsch, about 30 states have implemented all or part of the Iowa motor vehicle model that works with the trucking industry and law enforcement to combat trafficking.

Question 1. What is the impact in states that have adopted the Iowa model? Why is it important that states adopt this program?

Answer. Based on the groundbreaking work with TAT materials done by the Iowa Motor Vehicle Enforcement (Iowa MVE) agency, the Iowa MVE Model organizes the state patrol and other law enforcement entities to utilize entry points into the trucking industry to spread the TAT anti-trafficking message. The components of the model are as follows:

Train MVE/CVE/and/or law enforcement personnel with TAT materials.

Stock weigh stations, ports of entry and rest areas with TAT materials.

Ensure that every CDL issued (or renewed) is accompanied with a TAT wallet card.

Join the National Hotline law enforcement network by calling 1-888-373-7888.

Visit truck stops with TAT materials, urging them to train employees and distribute.

Implement TAT training as part of mandatory safety meetings for trucking companies.

In addition, states may also:

Use asset forfeiture funds to pay for TAT materials.

Begin collecting data of interdiction stops that lead to human trafficking investigations.

Mandate TAT training for entry-level CDL holders statewide.

The impact of the Iowa model has been 3-fold:

- (1) *State agencies that are often overlooked in the fight against human trafficking are becoming activated.* As there are over 3 million CDL holders in the US, and over 400,000 trucking companies, it is imperative that we engage as many entry points into the industry as possible in order to reach them all. Whether it be handing out one of our wallet cards with every CDL issuance or renewal, playing a TAT PSA in a waiting room monitor, allowing us to train specialized law enforcement units with this information, equipping rest areas with posters that contain the national hotline or assisting survivors in obtaining a driver's license, TAT is currently working with the Department of Transportation, Department of Motor Vehicles, Department of Public Safety, Department of Licensing and Department of Revenue in multiple states to accomplish those goals.
- (2) *Law enforcement officers are receiving anti-trafficking training and becoming empowered to reach the industry with this message.* What good is it if a trucker makes a call and law enforcement arrive, only to have the officer arrest the 15-year-old as a child prostitute? This is why the main starting point of the IA MVE model is ensuring all law enforcement become trained on the issue of human trafficking. Not only has TAT created a free and easily accessible

law enforcement training DVD: <https://vimeo.com/206215538>, but with our two field trainers (survivor-leaders), TAT does in-depth law enforcement trainings around the Nation in order to equip officers to detect human trafficking cases (specifically sex trafficking), while administering a victim-centered approach. In fact, after training all of the DOT officers in the state of MS in January of this year, two of the officers credited their TAT training when they were able to successfully separate a victim from her suspected trafficker during a routine inspection (see attached case study). TAT specifically targets Commercial/Motor Vehicle Enforcement, as these units (typically of the state patrol) come into the most contact with members of the trucking and bus industry. Whether it be ports of entry, weigh stations, interdiction stops or mandatory safety compliance meetings within trucking companies, we are asking all law enforcement units to spread TAT's anti-trafficking message whenever they come into contact with members of the industry (for an example, see attached report from the Michigan State Police). As a result, we have seen multiple state patrols partner together in outreach campaigns to the industry: http://www.in.gov/activecalendar/EventList.aspx?fromdate=2/1/2017&todate=2/28/2017&display=Month&type=public&eventidn=256841&view=EventDetails&information_id=255348&print=print

In addition, the Ohio State Patrol credited their work with TAT in seeing a 32 percent increase in calls, generating 125 cases. TAT has also provided resources to multiple state patrol units when conducting undercover investigations of truck stops. The model has also opened doors for TAT to host many of its coalition build meetings between industry stakeholders and their federal, state and local law enforcement officers. The details of these meetings and impact reports can be found here: <http://www.truckersagainstrafficking.org/coalition-builds/>

- (3) *More professional drivers are becoming TAT trained and making calls that ultimately save lives.* At any given time there are more professional truck drivers out on the road than law enforcement officers. By equipping and activating state agencies and law enforcement personnel to help us reach all 3 million CDL holders, we firmly believe a transient army of eyes and ears is being created to aid in the detection of traffickers and assist in victim recovery. While the National Human Trafficking Hotline only documents the location where the driver is calling from, not his or her home state, since the inception of these programs we have seen a continued increase of calls into the hotline from drivers . . . who have now made well over 1800 calls into the hotline, identifying over 500 cases, involving close to 1,000 victims . . . and this is only one slice of the data pie as no one is tracking 911 calls or calls made to the local sheriff around this crime. The following story was related to TAT from the hotline.

A male trucker was sitting in his truck when he was approached by a female no older than 14 years old, who was offering sexual services. Earlier, the caller had observed the minor walking from truck to truck with a male in his 20s. The minor spoke to the caller alone and told him that she was from another state and wanted to return home. The caller offered to help her but her male counterpart arrived at the truck and she became silent. The caller observed the male take the female to the shower area and reported the incident to truck stop management. The caller was directed by the management to call the NHTRC. The NHTRC took down the reporting details and advised the caller to call 911 for immediate assistance and to call the NHTRC back to help coordinate additional services and a report to our specialized law enforcement for investigation. Shortly after the call, 5 police cars were dispatched to the location and several males were arrested. The police notified the trucker that the minor was a runaway from another state and that the male had outstanding warrants and was arrested for kidnapping and other charges.

Question 2. How can we encourage more states to adopt this program?

Answer. The National Governor's Association would be a great place to start. If the governor of each state could share with his/her cabinet the effective pathways their agencies could adopt to become more aware themselves of this crime (because let us remember that this message is also taken back to the families of each employee), as well as engage industry (and this model can be replicated across modes and industries), we believe states would be able to fast-track engagement. We also recently presented at the National Association of Attorney General's conference, and have worked with numerous AGs across the nation, who we find to be ideal co-hosts for our coalition builds. We would love to see NAAG adopt this program as a best practice and use their extensive reach to ensure all law enforcement agencies in

their state become trained on human trafficking and empowered to reach industry members (specifically trucking and busing). Moreover, we believe the USDOT would be an ideal convener and conduit of information if they created a National Advisory Committee comprised of industry and NGO stakeholders who could inform states (governors and DOTs) of the existing best practices in combating human trafficking via transportation modes . . . the IA MVE model being among them . . . as well as report back on state implementation of the committee's recommendations.

RESPONSE TO WRITTEN QUESTION SUBMITTED BY HON. RICHARD BLUMENTHAL TO
ESTHER GOETSCH

Increasing awareness and improving training programs for key actors—such as truck drivers—to identify instances of trafficking is an initial step to ensuring survivors receive justice. Training is especially needed to identify labor trafficking, as there is less understanding about how to recognize, investigate, and prosecute this crime.

Question. Ms. Goetsch, are there additional tools and resources needed that would help the trucking community identify trafficking cases—particularly labor trafficking cases which are often underreported?

Answer. Labor trafficking cases are indeed underreported, and we believe in order to change that local agencies (government or NGO) should compile reports detailing which types of labor trafficking occur in their state. For some, the construction industry is rife with it, for others it's occurring on farms, for others it's shepherding (CO), for still others sweatshops are a major culprit. Before we can begin to instruct industry, particularly truck drivers, on what to be looking for in the course of their everyday jobs (which is why sex trafficking is so easily identifiable as it literally comes knocking on their doors), the intelligence must exist to determine where industry intersects with potential victims, and what credible pathways exist to safely assist the victims. TAT does not have the capacity to compile such uniform reports for each state, but would like to see either a state agency or a top-notch anti-trafficking NGO compile the information. TAT could then be a conduit of that information during our in-person trainings (tailored to each state) and on our website. Moreover, all law enforcement personnel should receive training on human trafficking . . . both labor and sex. It is extremely disheartening to have a professional driver make a call and have law enforcement arrest the victim, rather than the trafficker (or buyer), if they show up at all. In addition, more accurate and up-to-date data needs to be kept on what each city/county/state is seeing in regards to these cases, and that data needs to be easily accessible to other law enforcement personnel, state agencies and pertinent NGOs working to address this crime. Such data would assist in the aforementioned report creation, allow law enforcement to understand trafficking routes and hotspots in order to target investigations, and enable anti-trafficking NGOs to strategically focus their awareness/training efforts.

RESPONSE TO WRITTEN QUESTION SUBMITTED BY HON. CATHERINE CORTEZ MASTO
TO ESTHER GOETSCH

Question. The Department of Transportation has taken a number of steps to work with other government agencies and transportation stakeholders to address the issue of human trafficking. As an outside stakeholder, how do you think the DOT's efforts in this area are progressing? In your opinion, what more can or should the DOT be doing to combat human trafficking?

Answer. As TAT was an original member of the DOT's Transportation Leaders Against Human Trafficking group, we can speak to their initial efforts. While the intent was good, the resources were lacking. To my knowledge (Kendis Paris, executive director and co-founder of TAT, and the one who represented TAT on TLAHT), all that came of the group was a set of awareness posters and a website they hoped transportation stakeholders would utilize to exchange best practices. However, after the initial push, a 3-month rotating intern was appointed as coordinator of the program and as soon as that person got up to speed on the program, he or she left and a new intern was put in their place. (Please note, my knowledge on their efforts is limited . . . I am providing firsthand testimony of my own experience, their efforts may certainly extend beyond what I observed).

If the USDOT is going to engage transportation stakeholders on this issue, then they either need to create a new position to coordinate efforts, or add this responsibility into an existing full-time position. However, I believe the best way the USDOT could utilize its position to combat human trafficking is by being a convener of

transportation stakeholders and a conduit of information. By creating a National Advisory Committee comprised of industry and NGO stakeholders who could inform states (governors and DOTs) of the existing best practices in combating human trafficking via transportation modes . . . TAT's Iowa Motor Vehicle Enforcement model among them . . . as well as report back on state implementation of the committee's recommendations, they could play a pivotal role in fast-tracking states' engagement on the issue.

On June 7, 2017 around 3pm CST in Mississippi, MDOT officers were doing a special detail that week for the 72-hour check . . . check all trucks. One of the trucks hadn't come through the area, so Ofc. Havard flagged him in. He had a passenger, so when she started to do the inspection, she questioned him and asked if he had any passengers. He said, yes, but gripped the wheel, turned his back to the passenger and tried to maneuver his body towards the officer, which was odd, and so she kept questioning him. His body language, how he was acting, his flirtation with her were all red flags that something was off. It seemed he was trying to distract me from paying attention to his passenger.

Another strange thing was that he stayed in the cab of the truck and hadn't taken off his seatbelt. Normally drivers want to get out of their vehicle, they take their seatbelt off . . . he was resistant. He was also resistant to answering questions about his passenger. When Ofc. Havard tried to make contact with the passenger, she wouldn't maintain eye contact with her and she hid a little.

Ofc. Havard asked the driver how long he had known his passenger, and he answered that he only knew the passenger for one day. She asked if the company knew he had a passenger. He said, "I am the company." At this point, she knew she wanted to have a conversation with the passenger, so she asked the driver to come with her to the office to check his paperwork. The driver went with her, and Ofc. Havard asked a male officer to take over with him, so she could go back to the truck and speak with the female passenger.

She was dressed in flip-flops, very short shorts, and you could see her bra line under her shirt. She had very bad hygiene. Ofc. Havard asked her if she was in trouble. She kept pointing to her throat. The officer didn't know what that meant, but she first asked her if she spoke English. She nodded yes, but continued pointing to her throat. The officers asked her if she could write and gave her a pad and pen. Ofc. Havard asked her questions, and the woman would write the answers.

She didn't know her last name or DOB. She didn't have ID or possessions . . . didn't have or remember anything. She said her things were back in Florida. Ofc. Havard asked her if she was in any kind of trouble . . . the lady asked her to clarify . . . and she wrote on the paper, "how can I connect with you if I need help?" I asked her if she needed food or water. She wouldn't respond. The officer knew something was terribly wrong, and she told her that she couldn't let her, the driver or the truck go until she felt she was safe. The passenger wrote, "Don't do it." She seemed very fearful about the driver or truck being detained. Both the driver and passenger were being questioned. Passenger and Driver stories didn't match . . . who bought what, where they were headed, etc.

At that point, Ofc. Havard Called for another female officer and Captain Edins came to the scene. A 4-hour interview ensued, and they learned that someone had damaged her throat. The victim hadn't seen her family in a very long time, didn't know her age, and then guessed that she was 47. She was Romanian. She was watching for the driver constantly . . . she was reluctant to talk with LEOs. She wouldn't speak with male officers at all. When Captain Edins kneeled down next to her in an attempt to be at eye level and not intimidating, the lady went ballistic, and seemed both angry and scared by that. The FBI were called, but they couldn't get much more information than MDOT officers. Ofc. Havard and Captain Edins called the HT taskforce, and they got her help. She didn't go with the driver, and the driver kept refusing to leave without her. But he was told he had to leave the premises without the woman. That night, she was taken to a safe house in Jackson. She wouldn't eat during the interview, and she wouldn't eat when the lights were on. She would only eat in the darkness when no one could see her, and workers say she ate like she hadn't eaten in days.

The next day, Captain Edins called her at the safe home and spoke with her as she had promised. Unfortunately, later on she walked away from safe home.

Officer Havard and Captain Edins did everything correctly in this situation. They took extra time to ask questions of the driver because he had a passenger. They paid attention to non-verbal cues that indicated something was off, they separated the driver and passenger, and they used a victim-centered approach with the passenger. They took their time with her, figured out a way to communicate and got

her to a safe place that night. This lady had obviously been traumatized for a long time, and there was a lot happening internally due to the apparent long-term exploitation. It is the hope that a seed was planted in this woman's life that will give her the strength to seek the help she needed. In the short term, the officers were able to get the woman away from a man she was very afraid of and get her into a safe environment with food.

STATE OF MICHIGAN DEPARTMENT OF STATE POLICE

DATE: January 28, 2016

TO: Capt. Michael Krumm, Commander, Commercial Vehicle Enforcement Division

FROM: Lt. Susan Fries, Commanding Officer, Special Programs Section

SUBJECT: Truckers Against Trafficking Initiative 2015 Year-end Report

Background Information

The Michigan State Police (MSP), Commercial Vehicle Enforcement Division (CVED), has began an initiative to support the nationwide program Truckers Against Trafficking (TAT). Founded in 2009, the mission of TAT is to educate, equip, empower and mobilize members of the trucking and travel plaza industry to combat domestic sex trafficking. Currently, all but four states are supporting the TAT program through their state's trucking association, state law enforcement agency, or both. The TAT program has partnered with the National Human Trafficking Resource Center (NHTRC) in establishing a nationwide phone number to report suspected sex trafficking. MSP and the Michigan Trucking Association (MTA) were approached to promote TAT in the past but a program was never developed other than having pamphlets available at weigh stations for a short period of time with no follow-up.

Purpose

To establish a targeted approach in engaging the commercial vehicle industry to include truck stops, trucking companies, rest areas and the MTA in educating them on the TAT program. Through increased awareness, the MSP's goal is to build strategic partnerships in addressing the problem of human trafficking in the commercial vehicle industry.

Problem

It is estimated that anywhere from 100,000 to 300,000 minor children are being trafficked in this country at any given time. Truck stops are a preferred area for traffickers since there are many potential clients in one area and the girls can go from truck to truck quickly and easily. Motor carrier officers are the first line of defense for identifying criminal activity associated with the use of commercial vehicles. However, our officers had not been trained to identify, enforce or engage situations that may involve human trafficking. Furthermore, truck stop personnel, commercial motor vehicle drivers, and others are not aware of the TAT program and the resources available should suspected trafficking be encountered.

CVED Initiative

The CVED identified and trained two personnel to develop this initiative. These individuals met with TAT staff, attended a national conference, and developed a rollout plan for this initiative. The official kick off date of the program was January 15, 2015. The rollout plan consists of the following:

- Provide a 45 minute awareness level training session to all CVED members at their next district meeting scheduled in December and January.
- Provide talking points to enable officers to open a dialogue with drivers and provide TAT wallet cards for distribution to drivers.
- Train two or more members from each district as the CVED human trafficking coordinator who will initiate contacts with each truck stop in their district and serve as a resource for other presentations to industry and community groups.
- Track and maintain a database on the contacts made by CVED members.
- Develop and send out media releases to increase awareness of the program.
- Identify partnerships through the Michigan Secretary of State (SOS) to assist in disseminating the TAT materials and work with the Michigan Department of Transportation (MDOT) to have TAT posters hung at rest areas.
- Present CVED's initiative to MTA board of directors in February and follow-up with training in TAT at their annual conference in August.

Program Leaders

Lt. Susan Fries, Special Programs Section, 517-241-0583

District Coordinators

District 1	District 2	District 3	District 5	District 6	District 7	District 8
Investigator Recollet	Investigator Lopez- Patterson	Officer Jurkowski	Sergeant Leonard	Officer Parling	Sergeant Richardson	Officer Kennedy
Officer Russo	Officer Brendel	Officer Bartin	Sergeant Morrison	Officer Priebe	Investigator Archer	Officer Cameron
	Officer Streichert					

Presentations and Contacts

FY 2015 4th Quarter Oct. 1–Dec. 31, 2015

	Truck Stops		Carriers		Industry Assn.		Rest Areas		CVED		*Other		Media Contacts	
	Q4	YTD	Q4	YTD	Q4	YTD	Q4	YTD	Q4	YTD	Q4	YTD	Q4	YTD
Presentations	1	110	9	16	8	10	0	24	0	9	6	11	1	3
Persons	1	165	161	205	415	554	0	24	0	170	470	630	NA	

*Includes hotels, fast food establishments, churches, schools, etc.

Materials and Cost

This program is not eligible for funding under and CVED outside grants or funding sources. General fund monies were used for associated costs for implementing this program. Total materials costs to program thus far are \$1,923.30. The distribution of wallet cards has decreased significantly and there have been no additional purchases made in the 3rd quarter.

December 2014 Material Order

Posters	Wallet Cards	Brochures	Window Clings	DVDs	Total Cost
300	17,000	1,400	3,000	160	\$1,459.30

March 2015 Material Order

Posters	Wallet Cards	Brochures	Window Clings	DVDs	Total Cost
100	20,000	1,400			\$464.00

December 2015 Material Order

Posters	Wallet Cards	Brochures	Window Clings	DVDs	Total Cost
400	5,000	2,000	1,000	0	\$552.21

2015 Calls into the NHTRC Hotline from Michigan (last update 1/28/2016)

- Total calls—717 up 35% from 2014 where 529 calls were received.
- Human trafficking cases reported—152
- Calls from victims or survivors—124
- Michigan calls are up 16% compared to 2014 when 131 cases were reported

Significant Presentations to Date

- West Michigan Safety Council, (12/15/2015)
- MTA Summer Conference, (08/20/2015)
- MTA Truck Board meeting, (2/20/2015)
- Newago County Farmer's Forum, (12/08/2015)

- U.P. Traffic Safety Conference, (10/28/2015)
- Kent County Road Commission Driver's Challenge, (10/13/2015)
- International Brotherhood of Electrical Workers (IBEW) Local 17, (10/7/2015 and 10/14/2015)
- Michigan Dept. of State, (12/10/2015, 12/15/2015, and 12/17/2015)
- Northwest High School, Jackson (12/18/2015)
- Michigan CJIC Crime and Security Conference (09/01/2015)
- Prosecuting Attorneys Association of Michigan (10/16/2015)
- MTA Truck Driving Championship (6/5/2015)
- Dept. of Natural Resources, (04/21/2015)
- Alcona County Road Commission, (05/19/2015)
- MTA Safety Expo (4/14/2015)
- Chelsea High School sociology class awareness (3/5/2015 and 11/20/2015)
- Lunch and Learn MSP Headquarters (3/11/2015)

Program Highlights

- CVED was responsible for conducting 162 presentations on human trafficking awareness reaching 1,744 people in addition to countless roadside contacts with CMV drivers in 2015.
- Increased media coverage beginning February 5, 2015.
- Successfully trained all 170 CVED personnel.
- Trained 16 district coordinators.
- Partnered with MDOT placing TAT posters in all 78 rest area locations.
- Training of CVED investigators and auditors to offer TAT presentations during compliance reviews and safety audits.
- Presented human trafficking presentation to a record number of participants for a MSP Lunch and Learn.
- Positive feedback from field officers and drivers.
- CVED programs have been subsequently shared with Indiana, Nebraska, and Ohio.
- Presented to 125 drivers of the Michigan Trucking Association Truck Driving Championship.
- Presented to 105 teens at the Kiwanis (51) & American Legion (54) Youth Academies.
- CVED represented on Department working group to address human trafficking issues.
- Michigan Dept. of State (SOS) to include human trafficking awareness in next revision of the Commercial Driver's License Manual.
- Tips have been reported by CVED officers. Tips were reported to the NHTRC hotline and to D/Sgt. Ed Price. D/Sgt Price advised that though the tip regarding a young female traveling cross-country with an older male driver was unfounded at the time, he felt the she was possibly in danger of being recruited and/or had not yet been forced into the business.
- As proof that creating an awareness and changing perceptions is effective, a truck driver in VA reported seeing a female victim looking out the window of a motorhome where she was being held captive and forced into prostitution. The driver was aware of the program because Con-Way Trucking discusses this information. His call resulted in two federal court convictions of human trafficking.
- Female CVED TAT coordinators joined several other women of MSP to spend a day with teen girls at Vista Maria, a residential treatment facility for teen girls suffering the effects of severe abuse, neglect and other traumas such as human trafficking. The goal was to develop mentoring relationships with the girls.

Upcoming Opportunities

- CVED is working toward a partnership with Michigan Dept. of State to display a short TAT looping video in SOS Super Centers, and distribute TAT materials to CDL holders at the counter of all SOS branch offices.

Next Steps

- Continue providing human trafficking/TAT awareness training opportunities to the trucking industry and the community.
- Encourage CVED members to continue to talk about human trafficking awareness with truck drivers, use provided facts and talking points, and distribute wallet card on every stop.
- Begin conducting enforcement operations in cooperation with troopers and local law enforcement agencies using motor carrier officers and CVED commercial vehicles at truck stops.
- Work toward a department-wide plan to stop human trafficking in Michigan.
- Follow up with truck stops and rest areas in Feb. 2016 as a part of a tri-state initiative with the Indiana State Police and the Ohio Highway Patrol.

RESPONSE TO WRITTEN QUESTIONS SUBMITTED BY HON. RICHARD BLUMENTHAL TO
SAMIR GOSWAMI

Question 1. As consumers demand ethically sourced products, more companies are establishing policies that promote human rights in their supply chains. Unfortunately, connecting these policies to everyday practices often fall short of expectations and are proven to be easier said than done.

Mr. Goswami, how can we ensure the private sector goes beyond their corporate responsibility policies and takes full, credible action to clear their supply chains of forced labor? What tools and resources do businesses need in order to effectively vet all tiers of their supply chains?

Answer. There are many tools available to businesses to vet all tiers of their supply chain for risk of forced labor. Some are in initial pilot stages while others have proven effectiveness. The more promising models employ worker voice-centered approaches, engaging workers to confidentially share and exchange information through phone text message, smartphone apps, hotlines, and other channels. These tend to be more effective—and cost-effective—at finding labor abuses and risks throughout multi-tiered supply chains as compared with social audits, which are traditionally more reliant on feedback, documents, and reporting from the employer regarding labour conditions, rather than from the workers themselves. For example, in the case of Issara Institute’s Inclusive Labor Monitoring and worker voice systems, virtually every factory or farm that we found to have forced labour had been social audited in the past year.

On a related note, Issara has also found that running a worker voice-centered approach alone is significantly more effective when it is directly linked with the relationship and ability to immediately catalyze and drive solutions with risky suppliers. The action that follows the discovery of serious labor abuses in a global supply chain can lead to a host of unintended negative consequences if not well planned and executed with partners who can provide ongoing technical support to transforming business systems and carrying out remediation, while also looking out for the best interests of vulnerable workers.

Either way, businesses need to increase their spend, which stems from executive commitment, and go beyond the first tier of suppliers—a task which is considerably more affordable and possible now with the advent of a range of worker voice-centered tools and solutions.

Question 2. Some claim the global demand for inexpensive seafood has increased the pressure on companies to minimize labor costs and maximize profits. For countries such as Thailand, which suffer from labor shortages, the pressure for suppliers to meet the global seafood demand can lead to a reliance on human trafficking.

Mr. Goswami, drawing from your work experience in Southeast Asia, what prevention efforts do you believe are necessary to ensure large fishing companies are not contracting with traffickers who are exploiting migrant labor?

Answer. We need safe, ethical labor recruitment channels between source and destination countries in Southeast Asia whereby employers pay the costs of recruitment and not fishermen. Government legislation prohibiting the charging of recruitment fees to jobseekers and workers is helpful, as exists in Thailand, for example. However, if similar legislation does not exist in the source country as well, then there is a high risk that unscrupulous brokers and cost-cutting employers will find a way to extort fees and costs from workers in the source country, prior to migration. Business codes of conduct such as those promoted by the Leadership Group on Responsible Recruitment (which includes several of Issara’s Strategic Partners, such as Walmart, Tesco, Mars, and Marks and Spencer), can be especially helpful in these situations, particularly if local employers and recruitment agencies are

incentivized to collaborate with technical partners such as Issara Institute to be transparent about and make commitments to ethical recruitment in their contract and fee structures, as well as their provisions for protection of workers, ensuring that all workers—in this case, fishermen—are not in debt bondage, have control of their identity documents at all times, are not being charged fees that should be paid by employers, are placed into safe and non-exploitative workplaces, and are treated with dignity throughout.

Question 3. The State Department Trafficking in Persons report from June 2017 showed that labor trafficking prosecutions dropped to just 5 percent and labor trafficking convictions dropped to 3 percent of overall human trafficking cases in the United States.

Mr. Goswami and Ms. Sorensen, with the Trafficking Victims Protection Act up for reauthorization in September, what can the U.S. Government do to incentivize more accountability in labor trafficking cases?

Answer. Often, local law enforcement jurisdictions lack the expertise to investigate and prosecute what could be complicated human trafficking cases. The Department of Justice's ACT Teams have proven to be an impactful resource to local jurisdictions within the United States that have increased prosecutions. It should be recognized as well that most victims of labor trafficking, whether in the United States or abroad, are often not incentivized or made to feel adequately protected and prioritized by the criminal justice system, thus leading to low statistics such as the ones quoted from the TIP report, given the importance of victim testimony in human trafficking criminal cases. A May 2017 Issara research study entitled "Towards Demand-Driven, Empowering Assistance for Trafficked Persons: Making the Case for Freedom of Choice over Protection at the Expense of Empowerment" analyzed 117 human trafficking victim cases from our 2015–2016 caseload and found that the top two needs prioritized among trafficked persons were the need to find secure employment, and the need for support in legal proceedings to obtain compensation for lost wages. Remarkably, only 1 out of the 117 (less than 1 percent) had any interest in participating in the criminal justice process. The data strongly suggest that efforts to empower victims of labour trafficking, address swift repayment of lost wages, provide options for placement into safe jobs, and support reunification with family often go far in helping victims of labor trafficking stabilize to the point where they may be interested in reporting cases and cooperating with investigators and prosecutors.

Question 4. Illegal Unreported and Unregulated (IUU) fishing is a significant global problem that distorts competition, compounds global overfishing, and is frequently associated with a host of illicit activities—particularly human trafficking.

Mr. Goswami, how can the United States Government leverage current technology to establish traceability and ensure seafood products entering the United States are not the result of IUU fishing?

Answer. The U.S. Department of State and Department of Labor conduct research and publish reports about human trafficking around the world. These reports are very useful to multiple stakeholders, particularly businesses who wish to understand the related risks they face. U.S. Government entities can also increase their usage of new technologies that capture the experiences of workers directly to inform reports. That is, U.S. Government backed researchers should also collect primary source data from workers directly and publish those findings that will further inform supply chain decision makers. Importantly, U.S. Government entities can use these tools to monitor their own suppliers and contractors to ensure that they are complying with related procurement laws and regulations. Such leverage will then compel those suppliers to work with on the ground actors, like Issara, to implement improvements in supplier practices.

RESPONSE TO WRITTEN QUESTIONS SUBMITTED BY HON. CATHERINE CORTEZ MASTO
TO SAMIR GOSWAMI

Question 1. The procurement rules for U.S. Government contractors and sub-contractors requiring disclosure and certification that companies do not engage in any trafficking-related activities are a great first step to rooting out bad actors in our supply chains. However, I am concerned that these rules lack enforcement. I understand that since their implementation, there have been zero suspensions or debarments of contractors. To what extent are these rules being enforced and what are the barriers to enforcement?

Answer. Issara's experience in SE Asia demonstrates that business leverage works. That is, when businesses proactively work with their suppliers to share information and compel good action—the suppliers generally do so. The UK Modern

Slavery Act, the CA Supply Chain Transparency Act as well as increased media attention to labor exploitation in Thailand's seafood industry have all motivated businesses to use this leverage with their suppliers. However, it is not sufficient to simply compel suppliers to make improvements—often they need the technical assistance to create good systems and processes. While the U.S. Government can do more to enforce its own laws, especially pertaining to its own procurement, contractors and supply chains, it is equally important to resource the training and education required that promote on the ground solutions, including any victim rehabilitation. For example, Issara Institute has benefitted from such resources and has successfully worked with the local suppliers of multi-national businesses to implement data informed systems that have measurably improved working conditions for tens of thousands in just two years.

Question 2. In addition to ensuring justice for victims and prosecuting traffickers, we must eradicate the goods and services made by forced labor from our marketplaces. What can Congress do to incentivize companies to evaluate the risk of human trafficking in their supply chains? To what extent should businesses be responsible for informing consumers about the presence of forced labor in their supply chain and how can the average consumer access this information?

Answer. Government can play, and has played, a key role in incentivizing and stimulating companies to evaluate the risk of human trafficking in their supply chains. The California Supply Chain Transparency Act and UK Modern Slavery Act have compelled many companies to investigate and disclose their own diligence processes and procedures. USAID's Supply Unchained Initiative and U.S. State Department funding to organizations with boots on the ground and science and technology capacity such as Issara Institute have enabled the development of the tools and innovation needed to actually root out and crowd out exploitative labor practices. However, it is important for companies to provide outcome based metrics on successes they have had in transforming supply chains. That is, not just disclosing what processes they have employed, but what impacts they have achieved and in what percentage of their entire supply chain.

Question 3. You mentioned your work with retailers and importers to identify and address risks of trafficking and forced labor in their Thailand export supply chains and the use of the "Inclusive Labor Monitoring" approach. How do you work with suppliers and businesses to rectify the problem when you find labor abuses in a supply chain? How can Congress help foster and encourage such public-private partnerships that monitor supply chains and root out abuses?

Answer. Issara's system is basically one where we incentivize and enable multinational businesses to get a direct view of labor conditions across their supply chain, no matter how complex; support local suppliers to eliminate their labor risks and abuses, or risk being cut from the supply chain; and, offer technical assistance to progressive suppliers to fix broken labor recruitment and management systems. The three key elements of the model are *partnership with business, data and technology, and on-the-ground solutions*: taking a collaborative and science-driven approach but also an on-the-ground, within-supply chains-based methodology that draws upon the leverage that multinational brands have to drive improvements in their supply chains.

Issara is currently partnering with 15 leading brands, retailers, and importers, including Nestle, Walmart, Mars, Red Lobster, Tesco, Marks and Spencer, Sainsbury's and Waitrose, to identify and address risks of trafficking and forced labor in their Thailand export-oriented supply chains. We do this through our Inclusive Labor Monitoring program, whereby business partners share their confidential supply chain data, and our team on the ground works directly with their suppliers (all tiers) to identify labor risks and support solutions that are "owned" by the supplier. The approach is inclusive because all workers have the opportunity to individually share information in confidence at their own time and location of choosing, and receive assistance and support via Issara's multiple worker voice channels.

Issara builds trust with workers by engaging with them at the factory, in the community, and sometimes pre-departure in their home countries before migrating, and provides meaningful and timely information to help them navigate their journey. Trust is key because it underpins successful worker voice systems, and provides the concrete details for business and suppliers to understand what is happening in their factory and to take action. The end result is an integrated model where both workers and business see benefits, and there is impact to address trafficking in persons at scale. Having started out as a pilot in 2014, the Issara Inclusive Labor Monitoring approach has already made fundamental changes to exploitative working conditions for over 60,000 workers last year, with over 5,000 of those directly helped out of situations of trafficking or forced labor.

Support from USAID and the U.S. State Department have been critical for these efforts, for example, in providing the resources to Issara Institute to help develop its worker voice technologies. In addition to such funding, these government agencies also have the convening authority to incentivize businesses to work with on the ground civil society experts who can assist with supply chain remediation in a credible and independent manner.

ISSUES BRIEF

September 2016

Slavery Free Recruitment Systems

A Landscape Analysis of Fee-Free Recruitment Initiatives

Initial efforts to address exploitation of workers in product supply chains focused on the immediate working conditions at the factory or worksite. It is now widely recognized, however, that much of the exploitative practice in supply chains occurs in the process of recruitment for migrant workers, a process whereby migrants, unaware of other options, frequently pay high recruitment fees, and begin a journey of mounting debts. In the absence of other options for repayment, this debt effectively binds them to the workplace and leaves them open to further abuse, something that can take place without the knowledge of end employers.

In this context, there is a growing interest in the fee-free or "Employer Pays" model of recruitment, whereby migrant workers are not charged a recruitment fee and all costs are met by the employer. This paper summarizes the current discussion around fee-free recruitment, including: (1) definitions of fee-free recruitment; (2) linkages between migration fees and exploitative practice; (3) government initiatives on fee-free recruitment; (4) industry initiatives on fee-free recruitment; and (5) discussion of the key issues surrounding free-free recruitment.



AUTHOR

This brief has been prepared by Phil Marshall, Technical Consultant to the Issara Institute.

METHODOLOGY

This paper was informed by a literature review and discussions with key informants working on improving labour recruitment practices. Respondents represented private companies addressing issues within their supply chains; non-profit organizations and coalitions working with industry on establishing and monitoring recruitment standards; and, recruitment agencies with a "no fees for migrants" policy.

DEFINITIONS

Fee Free Recruitment

Fee-free recruitment refers to a situation where migrant workers are not charged any fees for recruitment or placement. There is an ongoing discussion about which of the costs paid by workers should be considered a recruitment or placement fee, which is covered further below.

Contract Substitution

This is where workers have signed one contract but are asked to sign a revised contract immediately prior to departure from their home countries or on arrival in the country of destination. The new contract generally has less favorable employment conditions. Often workers have already incurred a level of debt through fees to recruiters and sub-brokers, which means they have little option but to sign the inferior contract.

The Employer Pays Principle

The Employer Pays Principle is a logical extension of fee-free recruitment. Under this principle, the employer should bear the full costs of recruitment and placement for migrant workers.

Recruitment Agencies

Also known as labour brokers or migrant recruiters, recruitment agencies are intermediaries that supply migrant workers for the use of other business enterprises, usually on the basis of agreements with these user enterprises as well as agreements with the migrant workers concerned. They perform various functions, which can include matching migrant workers to jobs in other parts of the country or abroad, arranging for visas, making travel arrangements, and providing pre-departure orientation or training. Some recruitment agencies contract and pay the workers directly on behalf of the employer.

Direct Employment

Direct employment refers to a situation where all workers are contracted directly by the employer rather than indirectly by the recruitment agency. The employer may still use recruitment agencies to recruit the workers.

Direct Recruitment

Direct recruitment is where companies take responsibility for the recruiting and hiring of all workers.

What constitutes a recruitment fee?

There is a consensus around what constitutes fee-free recruitment in general terms but not yet on all the details. All 'no-fees' initiatives agree that fee-free recruitment specifically prohibits: (1) the charging to migrant workers of recruitment fees and placement fees, irrespective of where or how they are recruited and (2) a requirement for workers to pay a deposit or bond to secure work.

The costs on where there is no consensus include: passports and other travel documents; pre-departure training (which some governments make mandatory for all departing migrant workers); and transport from home to the first point of departure. With regard to passports, for example, one view is that a passport is the personal property of the worker and is a legitimate cost to any worker taking a job abroad. A contrasting view is that most workers employed are relatively poor and unskilled and would be unlikely to need a passport for any other reason.

A working definition, proposed by Fair Hiring Inc. and endorsed by several people consulted in this paper, is to consider any costs incurred prior to a job offer as the responsibility of the worker. This is a useful starting point, but does not in itself necessarily resolve questions such as passport costs. It is important to note that, with the possible exception of

pre-training departure costs, the costs on which there is disagreement are generally comparatively small and not those that might place an undue burden on migrant workers.

The Leadership Group for Responsible Recruitment

The Leadership Group for Responsible Recruitment states that "the costs and fees associated with recruitment, travel and processing of migrant workers shall be covered by the employer from their home community to the workplace, and return when the relocation is not permanent."

Fees included are outlined in the diagram below. The Group also states that "... where the migrant worker is legally required to pay a fee or cost directly, the migrant worker shall be reimbursed by the employer as soon as practicable upon discovery."

The Electronic Industry Citizenship Coalition (EICC) and the clothing company, Patagonia, have developed more detailed lists of fees that should be paid by suppliers, as represented in the infographic on the following page. As can be seen, Patagonia differs from EICC in that it considers transport costs from the worker's community to the first point of departure as a legitimate cost for migrants.



EXPLORING TWO PROGRESSIVE MODELS FOR FEE-FREE RECRUITMENT: ELECTRONIC INDUSTRY CITIZENSHIP COALITION (EICC) & PATAGONIA

PRE-DEPARTURE & DOCUMENTATION FEES

	EICC	Patagonia	The Debate
Applications, recommendations & recruitment fees	●	●	Fee-free groups agree that: -> migrant workers should not be charged recruitment or placement fees and -> workers should not be required to pay a deposit or bond to secure their work.
Labor broker and sub-agent fees	●	●	
Pre-departure training or orientation	●	●	There is continued debate on whether employers should cover: -> the costs of passports & other travel documents -> pre-departure training -> transport from home to the first point of departure.
New hire training and skills tests on arrival	●	●	
Pre-employment medical examinations & vaccinations in the sending country	●	●	
Visa & work permits	●	●	
New passport	●	●	
Work permit renewal	●	●	

TRANSPORTATION & LODGING COSTS

The diagram illustrates the migration process through four stages: Worker's home, Port of departure, Port of entry, and Job location & housing. It compares the cost responsibilities of EICC and Patagonia models.

- Worker's home:**
 - EICC:** Transportation & relocation costs paid by EMPLOYER.
 - Patagonia:** Transportation, meals, & accommodation to be paid by MIGRANT WORKERS.
- Port of departure:**
 - EICC:** Airfare & international travel costs to be paid by EMPLOYER.
 - Patagonia:** Airfare & international travel costs to be paid by EMPLOYER.
- Port of entry:**
 - EICC:** Border crossing & police clearance fees to be paid by EMPLOYER.
 - Patagonia:** Transportation & lodging costs to be paid by EMPLOYER.
- Job location & housing:**
 - EICC:** Transportation & lodging costs to be paid by EMPLOYER.
 - Patagonia:** Medical exams to be paid by EMPLOYER.

*The above information provides a summary of EICC and Patagonia's policies. Please refer to www.patagonia.com & www.eicc coalition.org for further details.

The link between migration fees and exploitative practice²

Initial efforts to address exploitation of workers in product supply chains focused on the immediate working conditions at the factory or worksite. It is now widely recognized, however, that much of the exploitative practice in supply chains occurs in the process of recruitment for migrant workers, something that may or may not take place with the knowledge of end employers.

Migrant labour recruitment is dominated by private for-profit recruitment agencies that link employers in countries of destination with potential migrant recruits in countries of origin. These agencies generally charge a fee for their services. Although generally billed as a fee-for-service payment, there are a number of mutually-reinforcing factors that contribute to the charging of significant and unauthorized fees to workers. These include:

- 1** Pressure on recruitment agencies to present the lowest bid to employers, which encourages passing recruitment costs to the worker to keep their fees to employers low. Employers or employment agencies may also demand a commission from recruitment agencies, the cost of which gets passed to workers.
- 2** The involvement of recruiting sub-agents, who often extract unauthorized fees from migrants.
- 3** Opportunities for recruitment agencies to require workers to attend pre-departure training and charge (potentially excessive) additional fees.
- 4** Requirement to pay a "behavioral" bond, which is forfeited for migrants not seeing out their contracts, often irrespective of the reasons behind this.
- 5** "Warehousing" – where recruiters stockpile migrant workers until jobs become available, charging them for food and accommodation in the meantime.
- 6** Opportunities for further exploitation of the worker through contract substitution, non-transparent salary deductions and mandatory and inflated charges for expenses such as accommodation and food.



Risks of Debt Bondage. The requirement to pay excessive fees as a condition of obtaining employment means that many workers go into debt. Often the debt is to be recovered from the future earnings of the work. In other cases, workers may borrow from money-lenders, often linked to sub-agents who recruit them. Interest rates on these debts tend to be usurious. As a consequence it can take migrant workers anywhere from five months to two years to repay their loans.

In the meantime, the existence of the debt – and the worker's urgent need to repay it – mean that the worker can more easily be manipulated by the employer to accept lower wages than that originally promised, poor working conditions, excessive work hours, or similar abusive practices. Debt-burdened workers are also much more vulnerable to threats of deportation – and consequent loss of their earning potential – than workers with no debt obligations.

Failure to repay debt can have severe personal and social consequences, particularly if the money is owed to those with connections to criminal elements, or if family assets have been leveraged as collateral. Even in the best case scenario, many workers return home having earned much less than anticipated or promised. Further, employers or recruiters often use the presence of a debt to justify withholding the passports of workers.

²This section draws heavily on text from (1) Open Working Group on Labour Migration & Recruitment, *Recruitment Fees and Migrants' Rights Violations*, Policy Brief #1, available at <http://www.responsiblerecruitment.org/issues>; and (2) <http://madenetwork.org/sites/default/files/Policy-Brief-Recruitment-Fees-Migrants-Rights-Violations.pdf>

Why does this situation persist?

Regulation of global migrant labour recruitment is extremely weak and "heavily influenced by vested interests and rent-seeking behavior among officials involved in providing the necessary authorizations for recruitment." A recent report by Verité highlighted a range of additional payments paid by recruiters including: direct kick-backs to employers for providing them with contracts; costs of travel, accommodation, and entertainment expenses for employer representatives; and bribes to government officials for approvals ranging from the issuing of work quotas to visa clearance. All of these costs are passed on to migrants.

Underpinning this situation is a large excess in supply of potential migrant workers compared to the demand for migrant labour, as a result of which the workers themselves have extremely limited bargaining power. Lower skilled migrants will often tolerate significant levels of exploitation, knowing that they can be easily replaced. In this environment, migrants are highly susceptible to illegal and large deductions. Verité indicates that recruitment costs can make up as much as 62% of a worker's anticipated wages⁴.

Current Initiatives

There are no universally agreed standards with respect to the payment of fees by migrants. To the extent that fees have been regulated in the past, there are a number of examples of these being set at a maximum of one month's wages. Early versions of the Electronic Industry Citizenship Coalition's Code Of Conduct, for example, stated that "Workers shall not be required to pay employers or agents recruitment fees or other aggregate fees in excess of one month's salary." At government level, Germany and Switzerland are examples of countries that regulate the charging of fees (in Germany this is €2000, while in Switzerland this is set as five percent of the first annual gross wage).

More recently, there has been a growing interest in fee-free or employer pays recruitment. This in part represents recognition that the cost of recruiting workers is a fair and legitimate cost of doing business. The main impetus, however, is the widespread abuses in the existing system.

1 ILO's Private Employment Agencies Convention

ILO's Private Employment Agencies Convention (known as ILO 181) was established in 1997 and states that "Private employment agencies shall not charge directly or indirectly, in whole or in part, any fees or costs to workers", although there is an exception for fees "(i)n the interest of the workers concerned, and after consulting the most representative organizations of employers and workers...". The Convention has been ratified by just 32 countries, however.

³ Even where the worker is not in debt to a money lender, they may have a "moral" debt to, for example, their families who have sold assets to fund the migration.

⁴ Marie Apostol, Fair Hiring Initiative / Presentation, "Ethical Recruitment," Regional Conference on Recruitment Reform, 17 December 2014, Amman, Jordan.

⁵ http://www.eiccoalition.org/media/docs/EICCCodeofConduct5_English.pdf

⁶ OSCE Survey of Responses to Trafficking in Persons, forthcoming

2 The Dhaka Principles for Migration with Dignity.

More recently, fee-free recruitment was highlighted in the Dhaka Principles for Migration with Dignity. Developed over two years of international multi-stakeholder consultation led by the Institute for Human Rights and Business (IHRB), the Dhaka Principles for Migration With Dignity were officially launched in December 2012 with the endorsement of the International Trade Union Confederation and the International Confederation of Private Employment Agencies (CIETT).

The Dhaka Principles are a set of ten principles for the responsible recruitment and employment of migrant workers. The first principle is that "No fees are charged to migrant workers." This is further elaborated as "The employer should bear the full costs of recruitment and placement. Migrant workers are not charged any fees for recruitment or placement."

Although not in any way binding, the Dhaka Principles arose out of the UN Guiding Principles on Business and Human Rights, established as a global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity. These are thus seen as an important initiative in normative terms.

Legislative/ Government led Initiatives

Since the Dhaka Principles were launched, there have been a number of other initiatives to support fee-free recruitment at both government and private sector level. As noted, ILO 181 bans the charging of recruitment fees but has only been ratified by 32 countries. Even where countries have banned recruitment fees for their own companies, this would

not necessarily apply to the supply chains of these companies. The Convention does not specifically define what is to be included and excluded in the definition of migrant fees. This is the focus of a tripartite meeting with employers and trade unions in Geneva in early September 2016.

1 United Kingdom

The **United Kingdom Modern Slavery Act** requires companies with a global turnover of £36 million or more (including turnover from subsidiaries) and carry on business in the UK, to produce an "annual slavery and human trafficking statement." It recommends including in this statement information on "the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to assess and manage that risk." Commentators have pointed out that the parts of supply chains where there is a risk of slavery/trafficking must include the labour migration process, but a standard has yet to be established on fee-free migration.

Internally in the UK, however, the **Gangmasters Licensing Authority (GLA)** requires that the "labour user requires its labour providers, agents and sub-agents to have a clear public policy against charging directly or indirectly, in whole or in part, any fees or costs to workers for work-finding services." This suggests that the recruiting agency must have a general policy on fee-free recruitment, not just for the contracts directly under the auspices of the GLA.

2 United States

The most far-reaching steps have been taken by the United States, through amendments to its **Federal Acquisition Regulations**, which "prohibits contractors, contractor employees, subcontractors, subcontractor employees, and their agents from charging employees recruitment fees." In place since 2013, this prohibition is still being clarified. In the current proposal on which comments were sought earlier this year, fees are seen to cover all costs associated with the recruiting process including: transferring, training, providing new-hire orientation, obtaining labor certification, visas, border crossing fees, photographs and identity documentation, and medical examinations and immunizations. Significantly, the Regulations cover subcontractors at all tier levels.

3 Denmark

The **Danish Government Anti-Trafficking Centre** has prepared guidelines which serve as a quick guide for companies and employers with risks of hidden forced labour and severe labour exploitation in their supply chains. The guide was prepared in consultation with a number of different stakeholders including business representatives and is intended as an awareness, business risk management and practical prevention tool. The guide is designed including checklists, to reduce risk and show responsible corporate behaviour with focus on precautions during direct recruitment and employment and use of contractors. Companies can apply the tool to conduct risk assessment, risk management and prevention. The guide encourages self-regulation and action and provides measures which companies can apply in order to avoid unintentionally being associated with cases of hidden forced labour, which may result in serious reputational damage and police investigations.

4 Multi-lateral Initiatives

At multi-lateral level, the **Organization of Security and Cooperation in Europe**, comprising 57 member states including all EU members, the US and Canada, currently has an initiative aimed at strengthening both government procurement practices and government regulation of labour practices in business supply chains. This initiative is expected to produce recommendations for governments by the end of 2017. As well as tightening up of government procurement processes to reduce the risk of procuring goods and services produced with the involvement of forced labour, the recommendations are likely to address government contracting criteria that are based solely on lowest cost.

The EU has already included a "**social conditionality clause**" in its procurement regulations to enabling purchasers to take into account factors not relating to price.

Industry Coalitions

1 The Leadership Group for Responsible Recruitment

The **Leadership Group for Responsible Recruitment** was launched in May 2016 with the stated intention of eradicating the charging of recruitment fees to workers within a decade. The Leadership Group's five founding companies are Coca-Cola, HP Inc., Hewlett Packard Enterprise, IKEA and Unilever. It is convened by the Institute for Human Rights and Business (IHRB) and also involves the Interfaith Center for Corporate Responsibility, the International Organization for Migration (IOM) and Verité.

The **stated aims of the Leadership Group include:** raising awareness and engaging industry leaders; providing a roadmap of concrete actions to move beyond commitment to the 'Employer Pays Principle' to implementation of policy and practice; collaborating with and reinforcing other complementary business initiatives such as The Consumer Goods Forum on Fighting Forced Labour and the Electronics Industry Citizenship Coalition Working Group on Protecting Vulnerable Workers; and supporting the development and implementation of systems to identify ethical recruitment agencies, such as the International Recruitment Integrity System (see below).

The Leadership Group also **encourages direct employment**. Direct employment provides employers with control over worker contracts, ensuring that recruitment agencies are not making ongoing deductions from workers, and that workers are not subject to contract substitution by these agencies. It does require an increase in internal resources to manage the contracting and payment process, but not to the same degree as direct recruitment.

2 International Confederation of Private Employment Services (CIETT)

The **International Confederation of Private Employment Services (CIETT)** was founded in 1967 and consists of 49 national federations of private employment agencies and eight of the largest staffing companies worldwide: Adecco, Gi Group, Kelly Services, Manpower, Randstad, Recruit Co., LTD., Trenkwalder and USG People. Its Code of Conduct states that "Private employment services shall not charge directly or indirectly, in whole or in part, any fees or costs to jobseekers and workers, for the services directly related to temporary assignment or permanent placement."

3 The Electronic Industry Citizenship Coalition (EICC)

The **Electronic Industry Citizenship Coalition (EICC)** is comprised of more than 100 electronics companies with combined annual revenue of over \$4.5 trillion. EICC requires members to adhere to a Code of Conduct on social, environmental and ethical issues. In March 2015, EICC had a special membership vote to change the Code position on migrant fees, stating that "Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker." Prior to that time, there was a one-month cap on fees. The Code of Conduct also applies to Tier 1 suppliers, many of which are major companies in their own right. Tier 1 suppliers are also expected to require compliance from their suppliers and so on down the supply chain.

4 Stronger Together

Launched in October 2013 **Stronger Together** is a business led, multi-stakeholder collaborative initiative whose purpose is to support organisations to tackle modern slavery within their businesses and supply chains. Stronger Together provides guidance, resources and training to support employers and labour providers in at risk sectors to deter, detect and address exploitative labour practices.

Stronger Together is currently developing its Supplier Policy for the Responsible Use of Labour Providers, which endorses fee-free recruitment and also recognizes the importance of addressing possible workarounds by recruitment agencies. To this end, the draft policy states that labour providers must not: (1) Charge workers for purportedly optional services which are in fact integral to the work-finding process; and (2) Make providing work-finding services conditional on the worker using other services or hiring or purchasing goods provided by the labour provider or any person connected to them.

5 Interfaith Center on Corporate Responsibility

The **ICCR** is a coalition of faith and values-driven organizations. ICCR is working with 51 companies in the food and agriculture sectors, asking them to establish procedures that ensure suppliers are abiding by the company policy to recruit responsibly and implement a supply chain traceability program to track the commodity to the producer. The program focuses on three areas: (1) eliminating migrant fees; (2) ensuring that employers or recruiters do not withhold

the passports and other travel documents of workers; and (3) ensuring workers have contracts in a language they understand that are respected and not subject to substitution. ICCR has not yet defined the specifics of fee-free migration and indicates it will be guided by the forthcoming ILO work in this regard.

6 Global Labour Provider Certification Scheme & International Recruitment Integrity System

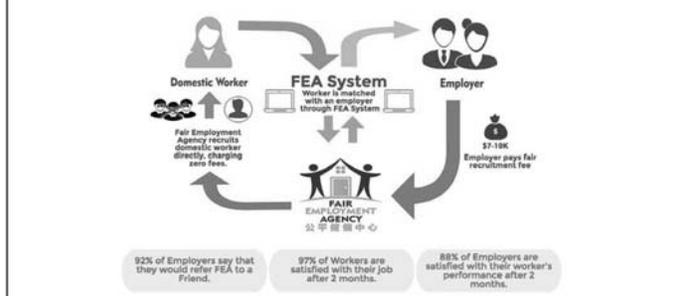
Two initiatives focusing on recruiter accreditation also include the principle of no fees to job seekers. These are the Global Labour Provider Certification Scheme which is being developed by the Association of Labour Providers and the IOM-led International Recruitment Integrity System (IRIS), which includes a voluntary accreditation framework, based on adherence to common principles for ethical recruitment.

Crowding out exploitative practice: The Fair Employment Agency, Hong Kong

The Fair Employment Agency (FEA) arose from recognition that recruitment practices for Filipino domestic workers in Hong Kong were more focused on serving the interests of recruitment agencies than either the employers or domestic workers. Not only did the charging of fees for domestic workers place many of them in debt, it encouraged recruitment agencies to focus on placement quantity rather than quality, with unsuitable placements actually benefiting the sector through increased turnover. This contributed to a proliferation of placement agencies in Hong Kong, estimated at around 1,300 for 340,000 workers.

FEA was set up in recognition of the need for an alternative for both workers and employers. It works with one local agent, which identifies potential workers and is paid sufficiently well to discourage "double-dipping", that is, claiming additional fees from migrants. FEA's business model relies solely on payments from employers and is thus based on employer and employee satisfaction. Bad placements mean both a loss of income and a loss of reputation. Fair Employment thus places strong emphasis on matching the right worker to the right household, taking into account not just what workers are able to do, but want they want to do. Technology plays an important role in the matching process as well as in communicating with both employers and employees.

FEA does not currently cover fees for the mandatory worker training but, in de-linking the training requirement from an individual agent, allows each worker to shop around for the best deal. Although initially funded by donations, FEA believes it is close to a sustainable business model and reports a 92% satisfaction rate among employers. Further, they consider they have developed an agency standard which will eventually require other agencies to adapt or become uncompetitive, thus crowding out inefficient and exploitative businesses. Although this model focuses on domestic workers, FEA considers that the core principles would apply much more widely.



Individual Companies

1 Hewlett Packard Enterprise (HPE)

In keeping with its role as founding member of the Leadership Group on Responsible Recruitment and its involvement in the EICC, Hewlett Packard Enterprise (HPE) has been working within its own supply chains to eliminate recruitment fees, and to require that "all foreign migrant workers must be employed and paid directly by the supplier, not by agents, sub-agents, or third parties." HPE recognizes that improvements in the recruitment process require time and planning noting, for example, that many suppliers rely on recruitment agents to handle on-site management of foreign migrant workers. Also, suppliers are obliged not to hold the passports of migrant workers, which means that the workers need access to adequate and secure storage, to understand the importance of safekeeping their documents and to have access to solutions if they do so.

To assist suppliers to meet its Foreign Migrant Worker Standards, Hewlett Packard Company produced a Supply Chain Foreign Migrant Worker Standard Guidance Document (available at <http://www8.hp.com/h20195/v2/GetPDF.aspx/c05116077.pdf>). The document covers: (1) transitioning to direct employment; (2) transitioning to a 'Supplier Pays' recruitment fees model; (3) transitioning to workers holding their own identification documents; and (4) identifying, screening, selecting and managing recruitment agents.

2 FSI Worldwide

FSI Worldwide is a recruitment company that only recruits on a no-fees-for-migrants basis. FSI predominantly recruits from South Asia for construction in the Middle East. FSI manages the entire recruitment process and does not use brokers or sub-brokers. Thus, while FSI requires its own infrastructure and is not necessarily a low-cost option, the organisation is able to guarantee fair recruitment practices. Many of FSI's clients are those bound by the US FAR to ensure that no fees are paid by migrants, meaning this certainty is important. Another example of a recruitment company founded specifically to address exploitative recruitment practices is the Fair Recruitment Agency (see page 8).

3 Vinci

An alternative model is that pursued by the French construction company Vinci. Vinci also recruits for construction in the Middle East but its model established in Bangladesh involves working with a select group of recruitment companies and assisting them to develop more professional operations. This process has reportedly involved a sizeable investment but led to improvements in all areas although doubts remain about sub-brokering.

Case Study: Thai Union Group



Thai Union Group Public Company Limited (TU) is the world's largest shelf-stable tuna processor and owner of a portfolio of leading global seafood brands. In April 2016, it announced that it would aim to eliminate recruitment fees for all workers in its factories and processing plants, effective immediately for all future recruitment of workers both from within Thailand and also from overseas.

Thai Union's workforce in Thailand is composed of workers primarily from Myanmar, Cambodia, and Thailand, recruited locally or through formal channels engaging licensed recruitment agents in Cambodia and Myanmar. The move follows Thai Union's continued development of an ethical migrant worker recruitment policy. In recent months, Thai Union has focused on reducing the potential for abuse and extortion by agents and brokers in recruitment of migrant workers. This work includes social condition mapping of all Thai Union's factories and processing plants to be carried out in 2016, to identify challenges in recruitment requiring an urgent response. In Thailand, the use of local recruitment agents (brokers) is being phased out, with Thai Union aiming to employ workers directly. Work with the Issara Institute and feedback from workers through Issara's helpline has also helped identify areas for improvement in the recruitment of workers, and awareness raising materials to educate potential workers on safe and legal recruitment are being developed in multiple languages.

By committing significant resources and time to dealing directly and building stronger relationships with recruitment agents in Cambodia and Myanmar, Thai Union has been able to map out recruitment processes more effectively, and positively impact the lives of people coming to work in Thailand in the seafood sector.

Discussion

A requirement for workers to pay reasonable recruitment fees does not, in itself, appear problematic so long as these are fixed at a reasonable level (e.g. one month's salary) rather than defined in vague terms such as 'not excessive'. Available data suggests that most migrants are willing to pay significantly higher amounts. The lack of negotiating power that unskilled and lower skilled migrants have, however, combines with vested interest to lead to a gross distortion of such fees. The EICC is an example of an organization that had initially capped fees at one month but eventually moved to an Employer Pays system, partly for ethical reasons and partly due to the growing international trend in this direction, particularly with respect to the US Foreign Acquisition Regulations.

Advantages of the Employer Pays model

1 Reduction in exploitative labour practice, including debt bondage and a better deal for all affected migrants.

For a large proportion of the world's population, migration is the single greatest route out of poverty. Fee-free migration and the associated reduction in exploitative practice offers a better deal for migrants, which is likely to increase remittances and thus have flow-on effects to the families and communities of migrants.

2 Incentives to minimize worker turnover.

In some sectors, the migrant pays system creates incentives for recruitment companies with regard to high worker turnover – the more migrants that pay fees, the more the recruiters earn. This is generally not in the interests of the employer. When the employer agrees a set fee with the recruiter for a specified number of workers, this creates an incentive for the recruiter to minimize turnover.

3 Lower recruitment costs.

An immediate advantage of the employer pays system is that it is likely to reduce the level of recruitment fees. Fees charged to employers are unlikely to be as high as those to migrants. Employers have considerably more bargaining power than migrant workers, and can "shop around" different recruitment agencies in a way that individual migrant workers cannot. This, and greater power to negotiate and enforce contractual agreements, lessens the potential for recruitment to inflate charges. Kickbacks

from recruitment agencies to employers for example would become an employer cost. Further, employers would not need to take on high levels of debt to cover recruitment costs, a major contributor to migrant vulnerability.

4 More professionalized recruitment services.

At present, the ability of recruitment companies to pass almost all costs onto migrants means there is limited incentive to become more efficient and professional. An employer pays system would likely encourage recruiters to focus on providing better value for money.

5 Early adoption of an emerging global standard.

The EICC's decision to move from a capping recruitment fees at one month to an Employer Pays system came about partly due to ethical concerns and partly due to recognition of the growing international trend in this direction. While the US Foreign Acquisition Regulations are particularly important in this regard because they will make the Employer Pays Principle an issue of compliance, and thus obligatory – the principle is also being driven by industry-led groups and other inter-governmental fora. Over time, it is likely to be the focus also of consumer attention. Thus, there appears an advantage to companies in taking steps at an early stage to build fee-free migration into their supply chains.

The Role of Government Policy & Practice.

Governments retain control over both labour migration regulation and the regulation of recruiting agencies meaning there are a number of actions they can take to influence the labour recruitment market, both positive and negative. These include: (1) the imposition of additional fees, such as Malaysia's migrant worker levy; (2) regulations such as requiring workers to pay a security bond; (3) policies and processes regulating foreign worker quotas; and (4) policies and practices relating to the employment of workers with irregular migrant status (that is, without valid visas and or work permits). These practices range from: very strict, such as in Malaysia where employers are held strongly and directly accountable for the immigration status of workers in their employ; to Thailand, where the government's systematic lack of action against employers engaging irregular migrants serves to undermine the legal migration system.

The role that governments can play in facilitating or impeding fair recruitment, including no or limited fees, suggests a potential advocacy role for businesses, particularly collectively such as through industry or cross-industry coalitions.

Challenges and decision-making factors

1 Increased costs for employers.

As noted, many employers are enjoying the benefits of cheap migrant labour without paying the full costs. Requiring employers to pay recruiters and monitor their practices will add to production costs, although there are potential off-setting gains in productivity from a more stable and ideally better selected workforce.

None of the companies consulted directly compensated suppliers for any additional costs incurred as a result of adopting a fee-free migration model, or knew of other companies who had done so. The general view seemed to be that this was just one of many issues that suppliers needed to consider in bidding for contracts and that, in setting clear standards for the employers of migrant workers, the buying company was acting to level the playing field. One company noted that prior to the adoption of this policy, suppliers with more ethical recruitment policies were effectively being placed at a disadvantage. Another informant considered that companies with multiple suppliers were likely running a dual system, with 'fee-free' workers working alongside fee-paying migrant workers.

2 Compliance and double-dipping.

The payment of fees by the employer does not act as a guarantee that recruiting agents are not also charging migrants. The Dhaka Principles state that "Employers should check with migrant workers on arrival that migrant recruiters have not charged any fees for recruitment or placement, and should take remedial action if fees have been levied." While there are examples of companies such as Apple who have required overcharged fees to be repaid, there may be reasons why migrants are unwilling to disclose that they have already paid a fee – the recruiter might have warned them, for example, that they would lose their job, their community would be ineligible for other contracts, etc. To address this, some companies promoting fee-free recruitment have sought to embed their own staff in migration process. Most initiatives to date involve employment in "closed" factory environments where it is much easier to monitor compliance. Several informants have highlighted the difficulties in working on, for example, large construction sites, where there are often a large number of different companies and recruiters involved.

3 Company obligations.

The Employer Pays Principle places a number of extra obligations on companies in addition to costs. At the very least, it requires companies to engage and negotiate with recruitment companies on recruitment costs and to put measures in place to ensure compliance with fee-free recruitment. A move to direct employment can assist to ensure compliance but places an additional HR burden on companies.

4 Sub-brokers.

As noted, the common principle for fee-free migration is that the employer meets cost from the point of recruitment. However, by this time, many migrants have already paid fees to sub-brokers. These fees may be significant as sub-brokers are generally unregulated. Organizations involved in recruitment have highlighted sub-brokers as particularly difficult to eliminate from the migrant supply chain. Many sub-brokers are based in communities and often seen as providing an important service. Recruiters without a presence in rural and remote areas are often heavily reliant on these sub-brokers.

5 Vested interest.

There is a huge amount of vested interest in the current recruitment set-up, with many different agents benefiting at the expenses of the migrants. Initiatives to date are not at a level to significantly disturb the status quo and it is unclear what would happen if this should occur. There are already reports of recruiters already adapting by over-charging migrants for administrative functions (in the words of one recruiter, "photocopying is expensive") and also setting up fake advertisements claiming to represent the HR companies set up by employers. As discussed below, there are also a number of actions Governments can take to influence the market if influential figures are adversely affected by industry changes.

<p>Worker retention.</p> <p>A common argument against fee-free migration is that migrants will not respect their jobs and be more likely to leave if they have not paid a fee. The limited literature available at this point, and feedback from those involved, suggests there is little evidence of this in practice. It is certainly true that some migrants are not prepared for the work they take and some wish to leave. However, there are also reports that some migrants leave to try and find other jobs (illegally) to be able to pay off their debt. Further, as noted above, recruiters currently have little motivation to mitigate turnover as more migrants mean more fees. Fee-free migration advocates argue that the fee-free system increases incentives for recruiters to ensure workers are well-briefed and for employers to ensure migrants are treated fairly, thus lessening the likelihood that migrants would want to leave.</p>	<p>Supply Chain Coverage.</p> <p>Employer pays initiatives to date generally focus on Tier I suppliers, while including a requirement that these suppliers require their own suppliers to adopt similar policies and so on. The issue thus becomes one more of monitoring adherence to these requirements. At present, monitoring at levels beyond the first tier appears limited. One industry informant acknowledged the difficulties in moving beyond the first tier. While some buyers were able to “jump” tiers, that is, work directly with second and third tier suppliers, most relied on a cascading approach, which would take time.</p>
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END GAME

There is a growing impetus for companies to adopt and enforce a fee-free or employer pays model for the recruitment of migrant workers. This model recognizes that current fee-paying models are resulting in huge exploitation of vulnerable migrant workers by recruitment agencies and other vested interests. The model also recognizes that recruitment of workers is a legitimate business cost.

Work in implementing the fee-free model is at a nascent level and generally only at the top tier of company supply chains. Generally, it is part of a wider range of measures that includes requiring companies: not to withhold passports and other documents; to ensure that contracts are respected; and often to employ migrant workers directly. At present, most companies appear to be focusing primarily on three areas: (1) ensuring that their Tier 1 suppliers understand the requirement to move to an employer pays model of migrant worker recruitment; (2) providing training to suppliers on how to implement this model; and (3) monitoring of compliance.

In order to facilitate implementation of these measures, there is growing interest in developing a more professionalized worker recruitment sector, with initiatives ranging from accreditation and certification to companies investing in selected

recruitment agencies to companies taking on recruitment themselves. With the exception of Vinci as noted above, there is currently less emphasis on this at an individual company level.

If, ultimately, the issue is about compliance to agreed standards, an approach in which companies work directly with selected recruitment agencies – and has robust measures in place to ensure compliance – does not preclude the charging of fees to migrants. As such, where supplier resistance is seen as a barrier to “Employer Pays”, companies may consider an interim policy of allowing recruiters to charge, say, one month’s salary to migrants, so long as the employer pays this cost up front and claims back from workers through agreed, transparent and interest-free deductions. Up-front payment by employers would remove the need for workers to go into debt and the potential for over-charging, while providing migrants with certainty in the migration process.

Companies considering this approach would, however, need to take into account the growing impetus toward fee-free migration as a global labour recruitment standard, which is being driven by both industry and government initiatives, and grounded in recognition of migrant labour recruitment costs as a legitimate business expense.

Technology to Address Human Trafficking & Forced Labour in Supply Chains

A Landscape Analysis and Recommendations for Brands, Developers and Investors

This paper examines how supply chain due diligence solutions that aim to uncover human trafficking activity can contribute to systemic solutions that transform supply chains. The overall vision is to not only rid production networks of modern day slavery, but become engines of opportunity for workers. As Issara continues to use technology to drive long-term, sustainable solutions and impact across whole supply chains, this paper provides recommendations to brands, investors and developers for an industry-level analysis of the viability and reach of such products, and prioritizes the need for primary sourced, worker-informed data collection.



AUTHOR

This brief has been prepared by Samir Goswami, Technology Consultant to the Issara Institute. Findings represent the views of the Issara Institute.

METHODOLOGY

This paper draws from Issara's experiences with workers, suppliers, brands and factories, desk research, and interviews and conversations with many of the featured technology solution developers. It explores many but not all of such solutions on the market today, providing a sense of the overall industry. This paper does not evaluate nor is it meant to critique individual existing solutions. It is intended as a guide to the industry to further connect the innovation in technology with transformative change on the ground.

The market for technology-enabled human trafficking due diligence solutions

Global brands and retailers have been using various established third party or in-house due diligence tools at their disposal to monitor suppliers for a variety of risks including financial, political, environmental and reputational. Due to heightened awareness and increasing regulatory frameworks about human trafficking, child and forced labour connected to the production of goods, some global brands have also demonstrated a need to source information about related risks in their supply chains. Subsequently, established and new companies have emerged to provide this information to them, utilizing various methodologies, technologies and data capabilities. The presumption has been that providing this information to supply chain managers in an easy-to-use format will inspire action, generally in the form of pressure on dubious sub-contractors to improve on-site working

conditions. Though there are some good examples of this occurring, further action is needed to convert the information gleaned from technology-enabled products to near-term interventions on the ground and long-term transformational impacts.

Some companies have increased spend on procuring such technology-enabled due diligence solutions specifically to ascertain human trafficking related risks. However, it is largely public and private donor entities and investors (for example, Humanity United, the C&A Foundation, the U.S. Agency for International Development and others) that are currently driving the market for product creation, utilization and innovation. Some small to medium enterprises, as well as larger global brands, are also incorporating such solutions, though at a limited scale in parts of their supply chain monitoring activities.



The goal: transforming industries. The practice of continuously monitoring and responding to labour risks throughout production chains can and should become standard operating procedure for global brands in the coming years, particularly given how technology has made such efforts significantly more effective and cost-effective than in the past. The technology-based product developers outlined in this paper each employ remarkable innovations and demonstrate that it is possible to glean insights from workers at the farthest rungs of a complicated supply chain. It is this innovation that needs to be rewarded with investments that can bring the technology to scale so that entire industries can be transformed for best practices to become the norm. In order to fulfil this vision, Issara Institute believes that at this juncture in technology-enabled human trafficking due diligence product and market development, it is beneficial to gauge the advantages of existing and emerging tools from an industry perspective, and establish recommendations for developers, brands and investors on an informed way forward.

Supply chain due diligence at-a-glance, and slavery due diligence v1.0

A corporation faces many risks when entering into a financial and operational relationship with another entity. To manage risks and prevent disruptions, they conduct due diligence to better understand and predict what issues may arise. Technology, typically computer-aided research capabilities that assist in sourcing, aggregating and managing information, has facilitated due diligence of multiple entities across geographies. The variety of data sources has increased significantly, however so have concerns about accuracy and validity. Generally, such due diligence was limited to environmental, political or governance factor that could cause a disruption in a supplier's ability to deliver on its contract, activity that could cause reputational risk, and in some cases harm to a worker or community. Only until recently have these methodologies been applied to specifically uncover labour abuses and human trafficking activity in supply chains as well.

Made in a Free World's Slavery Footprint app and Labor Voices have been some of the original pioneers in harnessing technology for human trafficking due diligence. They were among the first generation of product developers who showcased how technology can be used as an operational tool to inform a manager about the working conditions that site level workers experience, or a consumer about labour risks in products they buy.

In the past five years, technical capability has improved significantly, as have political will and regulatory frameworks that compel and incentivize supply chain managers to source such information. Thus, established due diligence and supplier management companies have entered the market with products and services, as have nonprofit and for-profit social entrepreneurs who have developed data enabled technology solutions primarily to uncover human trafficking, forced and child labour in supply chains.



The pioneers. Labor Voices was one of the first product developers to use SMS technology to poll workers regarding working conditions, while Slavery Footprint was one of the first apps to connect consumers and their consumption behavior with possible slavery.

Human trafficking due diligence: general methodologies employed

The general objective of human trafficking due diligence products is to inform and enable the reduction of risk in global supply chains. Some may have the more ambitious goal of enabling systematic improvement of working conditions by providing intelligence about human trafficking risks at the supplier or production level.

A number of solution providers collect and aggregate open source data (e.g. news reports, court filings, public records, NGO reports) about factories, suppliers or geographies of operation. Others utilize mobile-phone based channels such as SMS, IVR-Interactive Voice Response, telephone hotlines, or

smartphone apps to collect information from workers directly in the communities and production facilities being investigated or monitored. Some conduct additional data analyses by combining this primary data with other data streams, both primary and secondary, to gain added context and insight.

Generally, depending on the product, these data are then aggregated, analyzed and provided to an end user (e.g. a supply chain manager at a brand/retailer) through a customizable dashboard, report, or data feed. Thus, product developers aim to operationalize the input of worker voice and/or other sources of data as factors in supply chain decision making.



The challenge of proxy measures for human trafficking. Human trafficking and slavery are widely recognized as hidden, underground crimes requiring proxy indicators to measure risk. For example, in the sustainable seafood sector, indicators of illegal fishing practices are often assumed to be reliable indicators of illegal trafficking activity as well, with the assumption that fishing operators willing to break some laws would be likely to break others. The danger comes when positive data checks on those proxies are assumed to provide positive data checks on trafficking and slavery, when in reality they should not. For example, fishing vessels with relatively strong traceability systems for their product and legal registration and equipment have been found to use forced labour. The challenges of these misleading assumptions and proxies can all be addressed through applications that source information directly from workers, which can generate large data streams of verifiable information directly concerning working conditions.



Tools collecting primary data. GeoPoll, Ulula, and Labor Link all collect primary data of different forms, through different technological interfaces.



Turning worker voice into solutions. Issara Institute's locally-based team of labour experts are of the same nationality as foreign migrant workers in destination countries, allowing them to verify and validate incoming data through a variety of data streams, and work with local businesses to understand and eliminate the labour risks and abuses identified.

DEFINITIONS

Primary Data: Original content ideally sourced directly from workers (generally through an on the ground presence in their communities and/or through technology enabled channels like SMS, IVR, Mobile APP, worker social media feeds) and directly relevant to labour, provided in summary, aggregate, visualized and/or as individual response form to the user. Sometimes proxies are used, with varying relevance to labour issues. Primary data should be collected in line with ethical standards and principles, which include building communications channels with workers that enable developers to interact with workers they are sourcing data from and, at minimum, ensure their informed consent in the data collection and usage.

Secondary Data: Summaries of information generally from open source materials such as news reports, public records, legal filings, and NGO and government reports. Also referred to as "second-hand information."

Tertiary Data: Synthesizing information gathered from online and digital sources such as data obtained through scraping internet sites (e.g. blogs, social media sites). The verification and validity of this data is often challenging and problematic. While this data may be removed from the worker voice and subject to the publisher's interpretation, such (big) data can also reveal unique behavioral insights.

Primary Data Verification & Validation: Verification of data sourced varies by product developer. Those who utilize mobile technology to source information from workers directly are able to use the same channels to verify the results for accuracy. They can also use other means facilitated by their own on-the-ground presence in worker communities, through trusted local partners, or technologically via incidence checking, continued surveying or by comparing worker surveys with other primary or secondary data sources. Product developers relying only on secondary or tertiary data sources may find it difficult to verify the accuracy of the data they source directly, however, many only use reports from sources they trust such as local NGOs, INGOs or government agencies and tripartite entities. However, often assumptions about proxy indicators of labour risk may not be tested.

Data Aggregation & Presentation: Whether the developer utilizes a process to gather and disseminate data in summary form for the purposes of statistical or other analysis.

Data Analytics: Whether the developer examines and provides analysis of raw, primary source data for the purposes of drawing conclusions specific to those data sets.

Research & Analysis: Whether the developer engages in a transparent (while protecting proprietary and privacy concerns) process to glean insights and meaning from the data gathered and applies it to human trafficking prevalence in supply chains; and, if the individual sets of data are reviewed and analyzed to establish a finding.

Solutions On the Ground: This category indicates the extent to which the developer is directly linked to programs and mechanisms that create measurable impact for workers on the ground. In some methodologies employed, on the ground activity (such as brand pressure on suppliers as a result of disclosures) may be confidential and thus not publicly disclosed.

In Focus: On-the-ground solutions with measurable impact

Issara Institut has been partnering since 2014 with a range of US, UK, and European global brands and retailers to use worker voice technology to identify labour risks in Southeast Asian supply chains, and address them through preventive and corrective actions that are implemented by the suppliers in partnership with Issara's on-the-ground team of labour experts. Issara's worker voice technology started as a multi-lingual hotline, and has now expanded to smartphone technology, taking advantage of the fact that the great majority of migrant workers in the region have smartphones. A key aspect of the model includes having an on-the-ground technical team to cross-check and verify incoming data, respond to worker needs, and support suppliers in the implementation of improvements to eliminate labour risks from their labour recruitment and management practices. Just in the first year of Issara's pilot, improvements were made in factories impacting 40,000 workers, nearly 5,000 of them in forced labour. Issara Institute is a not-for-profit so the hotline and migrant worker smartphone apps are public goods developed first and foremost to empower and assist migrant workers, with the information being analyzed to also inform suppliers, global buyers, anti-trafficking actors, and others engaged in responsible sourcing and decent work for migrant workers. Business partners at present include brands/retailers Mars, Nestlé, Red Lobster, Sainsbury's, Tesco, Waitrose and Walmart; importers include Lyons Seafoods, Seafresh Group, and World Wise Foods.

LaborVoices is a supply chain analytics company that leverages a data-driven, technology approach to advance transparency in global supply chains. It crowdsources data from workers about workplace conditions via their mobile phones and communicates this intelligence in real-time to brands. LaborVoices has operated in 15 languages in 10 countries across 4 continents, reaching over 100,000 workers. In 2016, LaborVoices launched Symphony, a mobile technology platform that engages workers outside of factories, independent of brand and employer involvement, to anonymously rate their employers on various social compliance metrics. By publishing Symphony factory data every six months, LaborVoices aims to encourage a race-to-the-top among employers who, with increased transparency and accountability, will improve their workplace conditions to attract brand customers and employees. Simultaneously, Symphony helps workers learn about the best employers in their area, enabling them to vote with their feet to find the best jobs throughout their working lives. Since its launch in early 2016, the Symphony platform has rapidly scaled to include data on 160+ apparel factories from 10,000+ workers in Bangladesh and Turkey.

TECHNOLOGY TO ADDRESS HUMAN TRAFFICKING IN SUPPLY CHAINS: SELECTED PROVIDER CAPABILITIES

Products are all operational in different geographies and may focus on varying issues and sectors. As the below matrix indicates, developers specialize in various aspects of data collection and analysis, each with their own value to users. The matrix below is not a checklist, and only indicates publicly disclosed methodologies directly addressing trafficking and labour risks in global supply chains.

	EcoVadis	GeoPoll	Issara Institute	Kroll	Labor Link	Labor Voices	Lexis Nexis	Made in a Free World	RepRisk	Sustainability Incubator	Ulula
DATA SOURCE											
Primary	●	●	●	●	●	●	●	●	●	●	●
Secondary	●	●	●	●	●	●	●	●	●	●	●
Tertiary	●	●	●	●	●	●	●	●	●	●	●
PRIMARY DATA VERIFICATION & VALIDATION											
●	●	●	●	●	●	●	●	●	●	●	●
DATA CURATION & MANAGEMENT											
Data Aggregation & Presentation	●	●	●	●	●	●	●	●	●	●	●
Data Analytics	●	●	●	●	●	●	●	●	●	●	●
Research & Analysis	●	●	●	●	●	●	●	●	●	●	●
SOLUTIONS ON THE GROUND											
●	●	●	●	●	●	●	●	●	●	●	●

DESCRIPTIONS OF A SAMPLE OF PRODUCTS & TOOLS

EcoVadis

A global, multi-lingual, turn-key solution providing supplier CSR ratings, actionable scorecards, corrective action guidance, and CSRSustainability risk monitoring.

GeoPoll (Mobile Accord Inc.)

Supply chain monitoring solution directly reaches workers (over 300 million mobile users in database) and gathers information about conditions and experiences, while feeding the information back to relevant stakeholders via a dashboard to drive improvements.

Issara Institute

Worker voice-focused intelligence from a migrant worker helpline and smartphone App, paired with on-the-ground technical assistance, to drive systemic improvements by the suppliers in the supply chains of luxury global brand and retailer partners.

Kroll

Investigatory and compliance services to organizations facing financial, cyber, human and other risks through a global team of trained investigators and analysts.

Labor Link (Good World Solutions)

Utilizes mobile phone surveys to collect information and opinions from workers and farmers around the world. Responses are collected in real-time, aggregated and analyzed and returned to partners. Can also broadcast content to survey participants on any topic.

Labor Voices

SMS system that polls workers' mobile phones on safety and working conditions, to identify and solve problems in their supply chains before they become critical.

Lexis Diligence

Dashboard providing access to millions of public and private company profiles, in-depth country risk analysis reports, and biographical sources plus other open sources such as global, national and regional newspapers to blogs.

Made in a Free World

Private and secure software that identifies hot spots of risk in a supply chain and builds a customized action plan by providing a customized dashboard based on a company's purchase data.

RepRisk

ESG Risk Platform is a due diligence, research and monitoring tool that allows the user to dynamically identify and assess the ESG risks related to companies, projects, sectors, countries and other entities that may present compliance, reputation and financial risks.

Sustainability Incubator

Analyses information found in the public domain about various social issues in factories around the world to generate scores in low, medium and high categories of risk.

Ulula

Multi-language supply chain management, stakeholder engagement and M&E software that allows for seamless global auditing and engagement and supports almost any communication channel with workers.

RECOMMENDATIONS > Driving improvements for workers through data and technology

Though due diligence of suppliers and production chains is not a new concept, the past five years has seen a rapid growth in the proliferation of technology tools that provide insight into human trafficking and forced labour specifically. SMS, IVR and mobile Apps can now be deployed relatively quickly and at a lower price point. At the same time, mobile phone penetration of migrant worker populations is in areas as high as >90%, for example among Burmese migrant workers in Thailand. Coupled with advances in capabilities to analyze large, multiple and disparate data sets, supply chain decision makers are poised to benefit from the unprecedented ability to use technology to drive transformations in production networks.

That said, a due diligence product is only as good as the accuracy and breadth of data that it is built on. It is critically important to understand the scale and shortcomings of any product offering to be able to conduct a comprehensive verification process. Aside from technological challenges, all solutions are limited to the geographic locations that they are deployed in, their ability to scale, myriad local governance issues and resources to contribute to systemic changes. Regional geopolitical challenges can also hinder a product developer to deploy a mobile based tool in certain areas, or access partners who can verify primary source data without compromising a worker's or surveyor's safety.

While much value is derived from secondary data sources, transparency in representation of data types and analytical methodologies is paramount. If the data is not derived from trusted or verified site level gathering channels and with direct relevance to labour issues, then characterizing otherwise can result in a false positive which will only continue to mask the criminal conduct of an unscrupulous supplier, and negate the valid due diligence efforts of a supply chain manager. However, since there are many challenges to primary source data collection—transparency in any data sourcing methodology utilized can enable a user to deploy other tools to add to and complement these efforts.

Issara thus makes the following recommendations for various stakeholders and supply chain decision makers:

Brands

The majority of these solutions are developed to assist brands, however, multinational companies who face many such risks have not adopted such solutions at an

enterprise level. This landscape analysis shows the variety and breadth of products on the market today—yet brands are slow to adopt them. Despite increasing regulatory frameworks and fears of reputational risks, conducting systematic due diligence for trafficking does not appear to have become part of standard operating procedure for many brands and is often relegated to separate, limited corporate responsibility or ethical sourcing departments.

- **Make the investment:** It is recommended that brands fully incorporate diligence for human trafficking and forced labour into core sourcing functions and invest in the optimal product/s for your business needs. Brand investment will spur further innovations, drive down costs, enable expanded data collection and sharing, and fuel scaling. Most importantly brand investments and commitments can ensure that workers' rights are protected and violations prevented, and that long term responsible sourcing practices are advanced.
- **Know what you are buying:** When subscribing to a due diligence product, investigate the source and accuracy of information being provided and be cognizant of the tool's limitations. While analyzing a product, the following questions (among others) should be asked and reviewed:

- What are the data collection and verification processes of primary data collectors?
- Does the data capture realities on the ground through worker voices?
- Is secondary and tertiary data verified by the provider? What are the sources of this data and methods of verification?
- Can the inferences and analyses be generalized locally, regionally and/or sector wide?
- How much of the data is actionable?
- What are the protocols already established for remedial action if the data gathering is uncovering human trafficking and forced labour? What are the gaps in those remedial actions?
- Does the developer adhere to a strict data privacy policy that protects workers who participate, and ensures informed consent?

- **Be aware of limitations:** It is important to note that product developers may not offer a comprehensive set of services (from diligence to worker-level interventions and remediation), nor should they be expected to do so. Brands are encouraged to invest in a multi-stakeholder approach to institute needed, systemic reforms. Due diligence providers and product developers are integral parts of such partnerships that drive long term solutions. Furthermore, the implementation of any remedial initiatives deployed can also be verified by product developers that have the ability to collect and verify primary data.

Brands may also be concerned about public disclosure of such information and the legal and reputational risk such broader dissemination of data might pose. Companies can work with due diligence product developers and agree to disclosure procedures to proactively manage issues and address situations before they become risks, however, such protocols must be guided by the stated best interests of workers.

Investors

Investors are currently the primary drivers of the nascent market for human trafficking due diligence tools. They should also continue to ask critical questions of products that they are supporting and sustaining.

- **Incentivize brand adoption:** Investors also play a unique role in their ability to incentivize brands for enterprise-wide adoption of such due diligence tools to uncover human trafficking activity. For example, by partnering with brands to drive usage, investors can contribute to a path for sustainability and can alleviate some of the initial costs associated with product adoption, or use their convening power to forge partnerships between companies and product developers. Ultimately it is the financial and operational responsibility of brands to ensure that their production networks are free of human trafficking and thus any cost sharing by investors should not come at the expense of less resources for worker support initiatives.
- **Support multi-stakeholder initiatives:** Investors can increase their support of effective multi-stakeholder initiatives that bring brands, developers and social sector NGOs together to deploy a continuum of services to uncover and act upon abuses.
- **Conduct due diligence:** When evaluating a product to support, investors should also pose

the same questions to investment-seekers listed above in our recommendations to brands.

- **Continue to drive innovation:** Investors should continue to support the ingenuity and creativity of product developers and provide resources to apply latest developments in technology to supply chain diligence. Investors who are often guided by social change metrics are also in better positions than brands to invest in emerging technologies that can be experimented with to reach underserved communities of workers.

Government, private and foundation donors and investors have largely driven product innovation, development, and incentivized the market for such due diligence solutions. While continuing to invest in technology developments and innovations, we encourage investors to remain grounded in the end goal of ensuring that the tools do indeed impact workers' lives on the ground.

That is, the technology application is not in itself the solution—resulting improvements for workers at the production level are.

Product Developers

Product developers often face the dual challenge of continued innovation and revenue generation. Spending on products by brands (customers) is limited, especially in relation to the sheer volume of workers impacted by human trafficking, child and forced labour. Many rely upon investors, donors and partnerships to sustain their efforts and survive in a nascent market. Developers have done an admirable job of harnessing technology with social impact and producing operational solutions that can and do have an impact.

- **Authentic:** Brands rely upon the information received to make supplier decisions that impact workers lives and livelihoods. Full disclosure of data sources and data types (primary, secondary and tertiary) as well as the methodology of collection (while protecting proprietary business practices) will further assist customers to accurately assess their risks and deploy tools and comprehensive solutions.
- **Transparent:** Be transparent about information gathering resources and limitations, as well as the methodology employed to verify data sources and proxies. Incorporate privacy policies and responsible data practices that protect vulnerable populations.

- Realistic:** Product developers have technology expertise, but not necessarily the subject matter expertise to impact change on the ground. While technology developers should continue to focus on their core competencies, they should not make representations that their data, analytics, or dashboards are indeed a "solution." They are in fact important tools that indicate risk and uncover problems that need to be solved. Developers should also work with brands (customers) and investors to ensure that they are part of a continuum of supply chain visibility measures that are tied to programs that implement changes on the ground.

<p>Responsible data policies and practices.</p> <p>Are developers and key users of data engaging with privacy concerns and proactively managing potential risks and harms when collecting and analyzing data on vulnerable populations?</p> <p>A responsible data approach is sensitive to data that are ultimately comprised of personal information on real people, many of whom may be vulnerable. Businesses, investors, and developers are strongly encouraged to develop and deploy technology that treats their personal data responsibly—including concerns over privacy, personally identifiable information, informed consent, and (cyber) security, as well as policy questions such as: who has access to the data, and who is it shared with? Is the data shared in aggregate? Will the data be sufficiently anonymized? How is data shared directly with workers to empower them and inform their own choices?</p>	<p>Ensuring workers are protected¹.</p> <p>Before asking workers to participate, the organisation collecting the data should always:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Conduct a risk assessment, especially in cases where there is risk of employers accessing the data, resulting in negative consequences for workers. <input checked="" type="checkbox"/> Respect workers' time: data workers are being asked to source should be data that cannot be easily sourced through secondary or tertiary sources, so as not to burden workers where this isn't necessary. <p>During any data collection process, it is critical that:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Workers have provided informed voluntary consent, with no coercion, and have been provided with information on the possible risks and benefits of their participation. <input checked="" type="checkbox"/> Anonymity and confidentiality is ensured to the greatest extent possible and workers are aware of what they can expect. <input checked="" type="checkbox"/> No harm is done to workers, and personal safety and security is prioritized. <input checked="" type="checkbox"/> Interpreters and field teams have been adequately selected and prepared.
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END GAME

This paper is intended as a guide to developers, investors and brands to provide key considerations as we collectively drive the market towards universal adoption of technology-based human trafficking due diligence products that inform long-term solutions. The paper is not intended as a critique or evaluation of existing tools, but as an objective analysis of strengths, capabilities and value propositions of such types of products towards an industry-level analysis. We aim to advance the discussion around the critical role of technology in this field and re-prioritize the goal of providing business intelligence that amplifies the voices and respects the lived experiences of workers.¹

Workers themselves are (or should be) the primary trusted source of information about the working and

living conditions they face. Technology is now playing a powerful and effective role in collecting their perspectives and providing it in aggregate to supply chain decision makers. The working hypothesis has been that once supply chain managers can easily access such information, they and their company will act upon it. However, the technology and the information it allows easy access to is just a tool, and not a substitute for the political will necessary to act upon credible information about human trafficking activity.

The technology tools and their capabilities presented in this paper help us accomplish this end goal. The tools themselves, however are not replacements for the site-level execution of strategies required to improve conditions for and with workers.

¹ For more information see: United Nations Inter-Agency Project on Human Trafficking (2008). *Guide to Ethics and Human Rights in Counter-Trafficking*.



Issara Institute is an independent U.S. not-for-profit corporation based in Thailand, Myanmar, and the United States tackling issues of trafficking and forced labour through data, technology, partnership, and innovation. People—including worker voice and feedback—are at the center of Issara's data and intelligence work, and at Issara Labs we conduct a wide range of research, analytics, and technology development related to human trafficking in global supply chains—the people, the policies, the impact, and how to eliminate it.



FOCUS ON LABOUR ISSUES IN THE FISHING INDUSTRY



FROM TRAFFICKING TO POST-RESCUE

**INSIGHTS FROM BURMESE FISHERS ON
COERCION AND DECEPTION IN (ANTI)
TRAFFICKING PROCESSES**

SERIES PAPER 3

ISSARA INSTITUTE

JULY 2017

Prepared by Olivia Tran and Dr. Melissa Marschke in collaboration with the Issara Institute

OVERVIEW

This paper focuses on the experiences of Burmese men who, having been trafficked into Thailand's offshore fishing industry, are in the process of reintegrating into Burmese society. Discussions with 15 of these men highlight how they were coerced or deceived throughout all phases of their experience, from recruitment to post-rescue. While the men corroborated accounts of deception and abuse on Thai fishing vessels that have been widely reported by the media and non-governmental organizations (NGOs), in-depth interviews reveal other forms of deception and coercion by anti-trafficking actors. This raises serious questions for assistance providers about the protection and reintegration of trafficked persons and highlights why it is imperative that the international community, including businesses, NGOs, and governments, pay more attention to reintegration efforts and supporting these men to rebuild their lives. Recommendations to support these men include: rethinking appropriate and more empowering assistance; providing financial compensation; and strengthening engagement of the private sector in reintegration activities.

METHODOLOGY

In-depth interviews were conducted by the authors in November 2016 with 15 Burmese men formerly trafficked onto Thai fishing vessels who now live in Yangon and Myeik, Myanmar. Further informal port surveys were also conducted across Cambodia, Thailand, and Myanmar to help situate this analysis. The Issara Institute conducted follow-up interviews with nine of the fishers in June 2017. Some respondents were initially trafficked onto Thai commercial fishing vessels in Kantang, Thailand; others were trafficked onto Thai vessels fishing in Indonesian waters, eventually stranded in Benjina, Indonesia. The focus of the interviews was to understand their lives post-rescue and to think about how to better support these men as they re-integrate into Burmese society.

INTRODUCTION: STORIES OF DECEPTION IN TRAFFICKING AND DECEPTION IN ANTI-TRAFFICKING

This research brief focuses on the stories of 15 Burmese men who became victims of human trafficking on Thai commercial fishing vessels. It examines how they were recruited, the conditions they faced at sea and at port, how the men were rescued, and what happened in terms of assistance provision and their daily livelihoods once they returned to Myanmar. The men's experiences with exploitation varied greatly. For example, some men faced violent abuse, while others were tricked into fisheries but experienced decent working conditions and treatment.

Noteworthy were the forms of deception and coercion that the men experienced, not only from their traffickers (a mix of brokers and boat owners), but also from the authorities and other actors tasked with helping them. While many organizations have good intentions, and some support has likely been helpful, the feedback from these men highlights how an anti-trafficking assistance framework can harm and

disempower the trafficked persons that it is designed to help, specifically through repeated deception and coercion throughout the assistance process.

The respondents were rescued in 2015 from Thai fishing vessels either in Kantang, Thailand or Benjina, Indonesia, at a time when labour abuses at sea and fisheries reform were receiving increased attention by the Royal Thai Government and seafood importing nations. English-language media covered the brutal cases of 'sea slavery' in these two locations, which prompted rescue efforts and spotlighted labour exploitation in Thailand's seafood industry. Once the men were rescued and repatriated, however, little follow up by the media, national governments, the United Nations, or NGOs was conducted, even as the men continued to struggle emotionally, psychologically, and financially with the after-shocks of their trafficking experience.

"I went to a restaurant owned by a lady ... she opened a big restaurant. She was a broker. Her waitresses made us pay more [for food] than it actually costs and we couldn't pay. So she made us stay at her place and pay for it by working on the boats again."

For the Kantang respondents, their brokers were particularly brutal. In one case, a broker and her husband used violence and the threat of murder to force the men onto ships and scare them from escaping. A respondent described one such horrific incident:

"The woman [broker] took money directly from the owner of the fishing boats and when I asked for the money, the woman's husband showed me a gun and said, 'Do you want the money or a bullet?!' Just as I was about to run away, two guys ran away ahead of me and were shot dead. If they hadn't killed them, they would have cuffed them, and just tortured them, beating them behind the house to make a good example as I had seen them do before."

Another man recalled his own broker, known for murdering migrants:

"He was a drug addict, and would kill anyone for 3,000– 4,000 Baht (USD \$ 91– 121)."⁴

RECRUITMENT: POINTS OF DECEPTION

- Deception on industry and location of work.
- Deception related to length of employment or ability to leave or change employers.
- Deception on legality of work and migration documents.

RECRUITMENT: POINTS OF COERCION

- Violence, threats, and being held against their will.
- Use of debt bondage to force migrants to work on boats.

LABOUR CONDITIONS AT SEA AND AT PORT

Labour abuse on the fishing vessels occurred in various forms. Verbal and physical abuse were common, particularly if men were seen as working too slowly or as misbehaving. All men reported long working hours – sometimes up to 20 hours at a time – with few rest periods, certainly less than the current Thai legal requirement of 10 hours per 24 hours or 77 hours in a seven-day period.⁵ A Benjina respondent discussed the use of physical violence to enforce long working hours without breaks:

"We had three meals a day but we got to eat only if we were done working. If we ate before finishing our work, the captain would beat us. He would beat not only me but also the other workers every day. There were 22 Burmese and only two Thai workers on board, but they had guns so we could not do anything."

Some men also suffered permanent, physical workplace injuries. Two men from Kantang were left disfigured; one severed his finger with a net and continued working without medical treatment, while another lost an eye and injured the other eye in a shoot-out with the Indonesian Navy when the captain ordered them to fish illegally in foreign waters. The legacy of this abuse continues; doctors have told him that he will eventually become blind in his remaining eye.

Captains also employed other tactics like debt to

keep the men in forced labour conditions. One participant described how his captain charged interest rates of 50 percent, which workers could never pay off in practice. Captains and brokers also coordinated the exploitation of workers. As one respondent from Kantang recalled:

"I worked there for three or four years ... I didn't understand a word they were saying to each other because they were speaking in Thai. They told us that we were indebted to them so instead of a salary, they kept taking our money- saying it was money we owed them."

Both on and off shore, all respondents experienced working conditions in contradiction to Thai law, including long working hours, withholding of payment, no sick leave, and reports of cramped and unsanitary working conditions.⁶ Many spoke of limited water, and only eating a meal of rice and fish. At least two men were hired under the age of 18 (one as young as 10 years old).⁷

Not all of the men recognized the severity of the abuse. For example, hitting and yelling were common and some workers considered this 'deserved' if a worker was lazy or disobedient. Many Benjina respondents hoped to get paid after five years of work, even though five years without pay is an outrageously unreasonable contract agreement.

One respondent commented that he liked the adventure of being out at sea, although he was angry that he had been tricked into believing he would, at some point, be paid. Even the few men who liked 'fishing life' because they had 'good' captains did not like that they were not paid for their work.

As one Benjina respondent described:

"Our captains were nice and if we stayed put, stayed with each other and followed the rules, they would not do anything [harm us]."

For those men that ended up in Indonesia, they had little choice; once they were on fishing boats, the boats were diverted to fish into Indonesian waters. Local police were not seen as an option in terms of helping them. In Kantang and Benjina, the police were known to resell escaped fishers back to their traffickers, from whom they were likely to face severe punishment, including death. Coercion at this phase is particularly problematic, as it trapped the men for years in situations of exploitation and abuse.

Some workers contemplated escaping while they were at port, however their mobility was limited since they lacked the appropriate paperwork to enable them to move beyond the boat or pier. In Kantang, a particularly violent locale, workers were fearful to move around and often stayed in the docked boats; one man was reportedly caged when his vessel docked ashore. In Benjina, Indonesia, escape was impossible given the island's isolation from the mainland. Captains allegedly possessed satellite phones, but fishers would have had to purchase their own phones and SIM cards and hike a few hours

to the top of a mountain, which was the only location where they could receive service. While a few men did call home, many did not. The men described an island of "no rules," where if a Thai captain disfavored a crew member, which they claimed happened most often with Burmese crew,

"The [Indonesian] police would capture those people and beat them. Sometimes, they did it too much and they would just die."

AT SEA AND AT PORT: POINTS OF DECEPTION

- Deception regarding payment of wages.
- Deception of location of work and level of communication they could have with their families.

AT SEA AND AT PORT: POINTS OF COERCION

- Debt bondage, sometimes coordinated and exacerbated by both the broker and the captain.
- Resold to traffickers by corrupt police.
- Violence, threats, and intimidation.
- Restricted movement or confinement on shore.

DECEPTION AND COERCION IN THE RESCUE PROCESS

The men from Kantang described harrowing tales of rescue and escape. After years of abuse, they came across the Issara migrant worker hotline. One participant described trying to convince others to run away with him but they did not for fear of getting caught, or simply because they could not get away at the time of escape. For the Benjina men, the long-term journalistic investigation by an Associated Press team unleashed a mass rescue operation with various international and local NGOs and governments coordinating the removal of over 1,000 men from Indonesia back to four different origin countries.⁸

While the majority of the fishers interviewed were happy to finally leave Benjina, many were reluctant because they were waiting for their salaries, which were due in just a few months, after five years of work. Men also recounted how some Burmese fishers had hidden in the jungle to escape deportation because they did not

want to leave the families they had formed with Indonesian women on the island, after being stranded for years. The reluctance of some fishers to leave Benjina, in addition to accounts of authorities coercing them with threats of arrest if they did not leave with the rescue operation, raises the issue of forced assistance, and what more could have been done to assuage the legitimate concerns of migrant workers without risking re-victimization and reinforcing trauma.

A Benjina respondent described his hesitation:

"Calling us back here [Myanmar] is what made it difficult. For me, it was easy because I speak Thai and I was okay with the boss, so the longer I was there [Thailand], the more [money] I would have made. Here, it would be okay if the government compensated us like they said they would. Now I have to struggle a lot and I have spent way too much time with nothing."

Once rescued, the men were placed in government-run camps or trafficking shelters. For some of the Benjina workers, they stayed in camps run by the Indonesian government for up to two months before flying to Myanmar.

The camp conditions seemed fine, with Benjina respondents describing them as 'good,' except for one who noted that the flimsy shelters did not protect them from the elements. Meanwhile, the respondents rescued from Kantang were placed in a Thai government-run shelter while an investigation and court process unfurled. The men in this shelter stayed there for approximately seven to eight months and experienced restrictions on freedom of movement, communication and access to healthcare; discrimination by government authorities; and sub-par living conditions, as outlined in the table below. One respondent described efforts by police to get the men re-trafficked onto boats, and how he was ultimately deported informally back to Myanmar and, as a result, considered ineligible for any of the assistance offered by the government to other human trafficking survivors.

DECEPTION IS NOT ALWAYS OBVIOUS.

Two respondents described a work situation different than those of their colleagues: these two men knew that they would be working in Indonesia in offshore fishing and were willing to do so. They also described fair working conditions, and did not experience physical or verbal abuse. What they were unaware of, however, is that their salary would be withheld. These men truly believed that they would have been paid after five years, even though being unpaid for such a length of time is a form of forced labour. All of the respondents felt like they had been deceived by their rescuers – the government officials who had promised their wages within six months of return to Myanmar. None of the men interviewed – over a year later – had received their owed salaries.

COMPARISON OF POST-RESCUE CAMP/SHELTER CONDITIONS

BENJINA (INDONESIAN GOVERNMENT AD HOC CAMP)	KANTANG (THAI GOVERNMENT SHELTER)
PROS	CONS
<ul style="list-style-type: none"> No phone restrictions Only two months wait until returning home No feeling of discrimination 	<ul style="list-style-type: none"> Feeling of insecurity and discrimination Not enough food to eat Inadequate health care or attention to health needs
CONS	
<ul style="list-style-type: none"> Flimsy shelters Unable to leave the compound 	<ul style="list-style-type: none"> Incidents of re-trafficking by police Risk of informal deportation Recurring incidents like being insulted and called names; small amounts of money taken by officers Phone restrictions Unable to leave the compound Seven to eight months wait until returning home

POINTS OF DECEPTION AND COERCION OF KANTANG RESPONDENTS DURING RESCUE	POINTS OF DECEPTION AND COERCION OF BENJINA RESPONDENTS DURING RESCUE
<p>DECEPTION</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Told by authorities that they would receive their owed salaries. 	<p>DECEPTION</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Told by authorities that they would be paid six months after returning to Myanmar. <input checked="" type="checkbox"/> Told by authorities that jobs are plentiful in Myanmar.
<p>COERCION</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Some victims deported illegally back to Myanmar against their will. 	<p>COERCION</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Threats of arrest if they did not leave Indonesia.

DECEPTION AND COERCION POST-RETURN TO MYANMAR

Upon return to Myanmar, the men faced a difficult reintegration process. Reuniting with family was a joyous moment for many, but that too was not without challenges. From long lost wives and children, to returning to no family, or not being able to locate their families, not all men returned to a supportive network. Assisting the families of survivors is an overlooked aspect of reintegration considering that family support plays a crucial role in either undermining or facilitating the successful reintegration of the trafficking survivor. Family members, particularly wives and children struggling to survive after the trafficking of their husband/father, may also be considered 'secondary victims of trafficking.'⁹ Moreover, several men returned to ailing relatives.

Orphaned respondents in this research recounted especially poignant struggles in adjusting and surviving in Myanmar, and were much more dependent on NGOs for livelihood and emotional support. There was no formalized reintegration program dedicated to male trafficking survivors without family, but the men called one locally-based NGO for informal assistance because they had no one else to turn to. While this is an example of a positive experience with an NGO, it highlights a major gap in assistance, including the lack of a systematic and sustainable network of support services.

Soon after arrival to Myanmar, the men faced the return of economic pressures. This pressure was magnified since the men had worked for years with nothing to show for it. One Benjina respondent could not repay the debt he owed to community members who had financed his migration to Thailand; this debt had since grown, and he now had to borrow additional funds to pay for food and rent. Another former fisher, now working in fish processing in Myeik,

noted that he had big dreams before he left home, but now had returned with nothing. Men described feeling shame and embarrassment that it had not worked out as they had hoped. All the men described having a difficult time providing for their families or affording shelter and food, and most were extremely poor by Myanmar standards. The cases of returned Burmese fishers demonstrate that, for the most part, assistance ends once the person is rescued and they often end up in a worse financial/employment situation than when they left Myanmar.

The men interviewed self-identified as poor, and the majority were in an unstable employment situation. A common theme across the interviews was the daily struggle these men encountered to buy food, to pay rent, and to find more than casual work. One third of the men had picked up some form of construction work, often casual, which generally does not pay well. For example, men were being paid 1,000 Myanmar Kyat (USD \$0.96)¹⁰ per hour if there was work available, which is well below Myanmar's required minimum wage introduced in 2015 of 3,600 Kyat (USD \$3.48).¹¹ Another respondent in Myeik reported earning 50,000 Kyat (USD \$48) per month for construction work, often working a few days a week. This wage amounts to about USD \$1 per day.

The assistance provided to the participants was mostly material in nature, and generally bound by donor constraints. For example, the largest form of assistance was 500,000-600,000 Kyat (USD \$484- 581), which could not be distributed in cash but in items only (i.e. trishaws, rice and oil, tools, motorbike). Not only did this diminish the agency of the survivors to use the cash as they saw best, but there were also major flaws in how it was distributed.

The men were strongly encouraged to pick items that they could use to invest in a business, but were not given any short-term or long-term business or livelihood counseling. The men were not yet on their feet when they had to pick an item, and most men were at a loss regarding what to ask for. They accepted the common suggestions of the assistance officers and received a trishaw or rice to start a business. Two participants were more creative with what they asked for: one requested five months' worth of rent and another asked that a water well be built in his village. The latter said that it was the best use of the assistance because he recognized that using it for a business would likely not be successful. The former said that the funds provided for rent were fine, but that if he had combined the assistance amount with that of his son's, who also worked with him in Benjina, they could have built a house in their village, eliminating the need to pay rent. With the benefit of hindsight, all of the men noted that they would have spent the funds differently if they had been able to receive cash instead, such as invest in a new business, reinvest in a former business, buy a house, and repay debts.

All of the men would have preferred to receive cash assistance.¹² The men did receive some small cash assistance to help them in their initial readjustment period. They found this helpful in terms of initial emergency funds, but said that more money would have been needed if they were going to start a business, as other organizations had urged them to do. A criticism consistently emerged across the interviews: men were promised greater assistance than what was provided. Fishers felt that false promises had been made, which only increased their sense of disempowerment and frustration. For example, local and international NGOs asked a lot of questions, and some respondents found the manner in which they were questioned to be

inappropriate and intrusive. One Kantang respondent explained:

"The questions they [the assistance officers] asked me were, 'What do you want to do? What are you going to do? Are you going to herd pigs?' We [the returned workers] don't even have a place to stay; where are we going to herd pigs?"

Meanwhile, other organizations followed up initially and then dropped off. As one Benjina respondent recalled:

"For the first month they just called us and told us 'if you need any help, just tell us'. They did that for the first two months; then after that, nothing."

As another Benjina respondent noted,

"It is just words."

Respondents did not appear to have specific expectations about assistance they should have received, however, once services were offered and not provided, they felt misled and abandoned by assistance providers.

POINTS OF DECEPTION DURING REINTEGRATION

At this stage, while the trafficking survivors were not necessarily or intentionally deceived, they were made to believe that they would be receiving additional assistance that failed to be fulfilled, and can be considered a form of deception.

- Ad hoc meetings with organizations, with no follow up (i.e. creating false promises).
- No updates or further action on their case, despite providing statements to government officials and police.



The rice shop of one respondent (left) failed after a few months, due to insufficient support and training. He is now unemployed and hoping to return to Thailand safely. The respondent on the right made his iron cart with welding materials donated by an international NGO. Photo Credit: Myo Thiha.

VIEWS ON THE MEDIA AND GOVERNMENT AUTHORITIES

The fishers interviewed for this study were largely unaware that their story—so-called “seafood slavery”—had received extensive coverage in the international (and mainly English) media. Few articles, including those of the famous Associated Press investigations that won the Pulitzer Prize for Public Service in 2016, had been translated into Burmese.¹³ Even though the Burmese media—in English and Burmese—did pick up on the Benjina story, the men we interviewed were unaware of this coverage. This speaks to the reach of the media, and highlights how stories in and of themselves do not necessarily translate into empowerment or giving voice to survivors. Perhaps, in the context of Myanmar, the media reported as best they could given restrictions on freedom of the press, and censorship.¹⁴

While in Thailand, Indonesia, or back in Myanmar, the men also experienced discrimination at the hands of authorities, and there were plenty of examples that the men

could cite about unfair, unjust experiences even while having the special status of being a trafficked person. The men felt especially unheard and disempowered when some Thai police officers did not believe their testimonies. When they returned to Myanmar, officers there did not even bother writing down their witness statements. This also presents a problem for the delivery of justice and compensation for the survivors, and reflects the limitations of the justice systems in Thailand and Myanmar. One respondent noted that there was not much they could do on their own, since he felt that, if they were to organize and protest, this would be met with arrest. Multiple respondents from both Kantang and Benjina underlined the importance of spreading ‘the truth’ and making the public aware of the injustice they had endured. Participants also felt that greater public awareness would help speed up the trial of their traffickers and therefore expedite the payment of their lost wages and other compensation.

DISCUSSION: CONTINUED DECEPTION AND COERCION

Lies and abuse mark the trafficking experiences of the fishers, which in some cases lasted decades. Once the men were rescued, this was often considered the end of the story for the public and the authorities. However, deception and coercion continued in other forms, this time from figures of authority and organizations that the men were supposed to trust. Authorities promised that job prospects in Myanmar had improved and that they would receive their salaries within six months, only to receive very little or nothing of what was promised to them. The men were repeatedly given false hopes of assistance, payment of lost wages and other forms of compensation.

International and local NGOs have approached the human trafficking survivors offering assistance. They have taken the men’s time to interview them on their condition and needs, which often involves them traveling long distances and taking time off of work; however, in many instances the men have not heard back from them. For example, one Benjina respondent left Yangon to work in another

province in Myanmar while awaiting news of compensation. While he was away, an organization handed out assistance in the form of items worth 600,000 Kyat (USD \$581). Once the man heard about this, he rushed back to Yangon to receive his compensation, but was told he had missed the deadline. He had left his job and paid for the long journey back to Yangon only to receive nothing. While donor assistance is often attached to conditions and there were likely a host of logistical reasons why the man could not be given assistance, his experience is another example of how service providers, in their goodwill, can also instill false hopes in men who have already been misled and traumatized.

In Myanmar, the men were frustrated at still not having been paid as promised, yet there was nothing they could do. What makes the situation worse is that the men were unaware of the intense media coverage on slave labour at sea or the millions of dollars committed to addressing the issue—and yet these men still have not received compensation or justice.

STATUS UPDATE: WHERE ARE THEY NOW?

In June 2017, Issara spoke with nine respondents interviewed for this study (six Benjina and three Kantang respondents) to get an update on their lives since having returned to Myanmar. This update highlights the struggles faced by people after trafficking experiences and the resilience of these persons in their plight to build successful and meaningful lives.

A common theme among respondents was the need to take on informal work. One Kantang respondent found that the construction industry had changed significantly during his years away, but with the help of friends, he found work as a carpenter in his village. Another Kantang respondent first worked in a car repair shop and then as an informal fishing worker. Another Kantang respondent took a job working as a ticket collector on public buses, which he found with the help of his uncle.

Many of the respondents attempted to start their own businesses when they first arrived home. One Benjina respondent opened a shop selling rice, but when the business proved unviable after three months, he took a job as a construction worker and began doing odd jobs. He is now mostly unemployed. Another Benjina respondent opened a betel nut shop and at first expanded to selling coffee, but when the business failed, he began working as a trishaw driver and as a daily wage labourer doing odd jobs.

For some respondents, their trafficking experience took a toll on their physical and mental health, severely impeding their ability to continue living their lives as they might have hoped. One Benjina respondent had lost his vision during an accident on the fishing boat. Despite enrolling in a massage course for the blind, his traumatic experience proved too much; he struggled to get along with fellow students and returned to his village where he is now homeless. Illness in the family presents additional challenges. One Benjina respondent is currently working as a handy man and selling lottery tickets, but is limited in pursuing other options as he taking care of his sick father.

Despite hardships, many respondents persevered and employed a range of agency strategies in pursuit of financial security, such as living with family and friends to save money, taking on multiple jobs, regularly changing jobs, and migrating internally and internationally. One Benjina respondent worked for his family business at first, installing and repairing air conditioners, but as the income was insufficient he supplemented this work renting out his own trishaw. Another Benjina respondent, whose rice shop business failed, hopes to re-migrate to Thailand with help from Issara to find a reliable recruitment agency and employer. Another Benjina respondent employed an agency strategy he knew well—migration:

"I was unable to find work when I returned home. I first migrated to Yangon and worked in construction sites and as a handy man in a brick making factory. After working for ten months without overtime pay, I quit and began working at a car wash. Unable to save enough money, I returned to my home village and took another job, but eventually moved back to Yangon with my wife to take factory jobs."

Some respondents developed broader aspirations in the post-trafficking space, including a desire to provide others with information to prevent situations of human trafficking. One Kantang respondent has been collecting information about labour conditions in the fishing industry in southern Myanmar, and wants to re-migrate to Thailand in hopes of finding better employment as well as to provide information to migrants. Another Kantang respondent has been sharing safe migration information in central Myanmar and plans to re-migrate to Thailand:

"Adjusting in Myanmar has been a big challenge. As a person who lost contact with family and has no home, life is very tough. However, I have not given up and keep a strong hope and desire to return to Thailand legally and do something to help many other people."

STATUS UPDATE: KANTANG SURVIVORS



"I thank the government officials and organizations for rescuing us, but I am still angry at the fact that we were rescued by the government and identified as witnesses but we did not have a chance to provide our statement to the court. Then we were deported back to Myanmar through illegal checkpoints together with other undocumented migrants. Because of not being repatriated through official channels, I and four of my friends in the same group were not identified as victims of trafficking by the Myanmar authorities, and did not receive assistance like our friends. For instance, I had difficulty applying for my NRC [Myanmar Nationality Registration Card] and, still, I do not have one. I was asked for different supporting documents, while one of my friends who came back and had no documents received his NRC within a month after returning. If I were officially handed back to the Myanmar government through the formal channel, I would not have this problem now. Moreover, I have no hope to claim my unpaid wages while other friends who were identified as victims have hope that they will get their compensation. We do not know why we were not identified as victims of trafficking. What can we do now? Any chance that I can provide my statement to an official now?"



"Integrating and adjusting myself in Myanmar have been big challenges because, as a former net supervisor, I am not liked nor trusted by others who were rescued from the same employer. And as a person who has lost contact with my family and who has no home, life is very tough. However, I do not give up. I am keeping strong hope and desire to return to Thailand legally, and to do something to help many other people by working with Issara."



"I want to share my story with everyone so that people like me will not be cheated. It is good that I received support from different organizations after we returned to Myanmar, but I still hope that we all will receive our wages and compensation so that we can start a good life back home."

STATUS UPDATE: BENJINA SURVIVORS

"We were told not to worry about our lost wages because the government would ensure that we would get it. Before leaving Benjina and Ambon, we had to sign many papers which gave us hope that we would get our money back. But still we have not received our money except support money from organizations like Issara and IOM [International Organization for Migration]. Some of my friends working in the same vessel group, who were not rescued, returned by themselves as their boat returned to Thailand, and they came back home with 20-30 million Kyat (USD \$19,381-29,042). As a trishaw driver, I get 8,264-10,330 Kyat (USD \$8-10) per day, so I am struggling to survive and send my two children to school."

"My other friends who made their way back from Thailand by themselves from the same vessel group received their wages and are running their own businesses now. But for me, I still do not have a proper job and am still in debt, as my father is not well. The Myanmar Department of Social Welfare and Anti-Trafficking Police assisted me and my friends to get NRC cards, however the township immigration office has given us a hard time since I did not have all the required supporting documents. Finally, I gave up since I did not have the money to go there again and again, and I also lost my daily income every time I went there."

"It is very difficult to find a job and to run a small business, so I am considering going back to Thailand with some of my friends ... although I do not want to go and work there again. Do we have any hope to get the unpaid wages that we were promised before we left Benjina?"

"We were told that we would get our unpaid wages from the fishing boat owner or the captain one month after our return from Indonesia, but nothing happened. The Myanmar Embassy staff told us that we would get our unpaid wages within two months. We had to fill out different forms until our hands got tired. After we came back, we were interviewed again and again and had to fill out different documents again. I gave information on the vessel owner, number of years on the vessel, and all the information that I had. Before I left Benjina, I even met with the vessel owner who promised me that he would give me the money. My friend who went on the same journey but ended up on a different vessel owned by the same person came back from Thailand with money ... For us who returned with the assistance of the government, we have waited for more than two years and are losing hope. The help that we have received from different organizations has been very helpful, yet we all want our unpaid wages, so that our lives will be better off."



Forms of deception and coercion experienced by fishers in this study

	Recruitment	Work at Sea	Rescue	Reintegration
Deception	Industry and location of work Length of employment or flexibility to leave/ change employers Employment documents	Payment of wages Location of work and level of communication with family	For Kantang respondents: Receipt of their owed salaries For Benjina respondents: Receipt of their owed salaries within six months Availability of jobs in Myanmar	Provision of services by organizations Lack of follow up on their cases, despite providing statements to government officials and police
Coercion	Violence, threats, and being held against one's will Debt bondage	Debt bondage Resold to traffickers by corrupt police Violence, threats, and intimidation Restricted movement or confinement on shore	For Kantang respondents: Deported illegally, against their will For Benjina respondents: Threats of arrest if they did not return to Myanmar	



Katang respondents reunite in Yangon and read Issara's Annual Report, which includes their stories and voices.
 Photo Credit: Myo Thiha.



Working with the respondents to capture their perspectives and collect their inputs for the completion of this paper.
 Photo Credit: Myo Thiha.

RECOMMENDATIONS

The following are recommendations for assistance providers on how to support the dignity and livelihoods of trafficked fishers.

1 Placement in shelters should only be voluntary, and only into shelters with adequate staffing and resources.

Very few trafficked persons want to be placed in shelters. Trafficked persons should not be placed in shelters involuntarily, for indefinite periods of time, or for unexplained purposes. In cases where trafficked persons need to reside in shelters, their freedom of movement and communication should be maintained to the greatest extent possible, particularly given that restrictions on freedom of movement may have been a main component of their trafficking experience. Government and NGO shelters should only be operational if they are able to offer their residents adequate food and health care services. The structure of buildings should be sound and able to withstand local weather conditions. Shelters should be staffed with qualified and compassionate counselors and other individuals, particularly those who do not possess discriminatory or hateful attitudes towards the population they are tasked with serving. Police or other authorities should not be allowed to enter the premises without authorization and good reason, such as to prevent the types of abuse faced by the Kantang respondents in shelter.

2 Trafficked persons should have a voice regarding their situation and abuse in international media coverage.

As was found through this research, trafficked persons may be completely unaware of international media coverage of their specific cases of abuse, and at the same time they may feel completely unheard and disempowered. Service providers can play a role in connecting trafficked persons to international media in simple cost-effective ways, for example, by conducting media awareness workshops, translating key journalistic pieces into local languages, or by encouraging local media to

feature summaries of international articles. Those interested in using the media as an empowerment tool could facilitate interviews for trafficked persons with international journalists or host activities to make their voices heard. On the media side, journalists whose stories are heavily reliant on or focused on the abuse and suffering of others should allow those victims some voice in shaping the story – for example, sharing their views on what outcomes should be gained from telling their personal stories to audiences of thousands or millions.

3 Recognize the legitimate reasons why trafficked persons may not want to return home.

In the context of human trafficking and labour exploitation that lasts years or decades, migrant workers may have developed any number of coping mechanisms in order to live in the destination country. Despite enduring abuse and exploitation, they may have integrated with local communities, learned local languages, and formed supportive relationships: some have even married people locally. Trafficked persons may have no one to return to and no support system in their home countries. They may not want to return home due to difficult family issues, which might be even more challenging to deal with after having been trafficked. Some Benjina respondents even hid in the jungle to avoid repatriation, which shows the extent to which some migrants wanted to remain in Indonesia. Service providers, including government and NGO bodies, should work with trafficked persons to identify what they want to do next, and where they can go to gain access to a strong emotional support system. Forcing a trafficked person to leave a destination country under threats of arrest poses a high risk of re-victimization and reinforcing trauma. Service providers should consider all available options to consider a trafficked person's desire to remain in the destination country, and, if needed, provide avenues with legal support for recruitment into new, decent jobs.

4 Provide adequate psychosocial assistance for trafficked persons and their families.

There is a general lack of psychosocial assistance for trafficked persons and their families, as was reflected in this study. Reunification with family after long periods apart can be very difficult emotionally both for the trafficked person and for the family members. Trafficked persons may learn that their family members are sick or have died or may struggle with being reunited after failing to provide for them financially. One respondent was unable to find his family at all after 11 years in forced labour.

Meanwhile, family members may have thought their trafficked relative was dead or have moved on with their lives significantly. They may, themselves, face trauma from seeing their family member suddenly after a long period of time, in particular if they have been struggling to survive financially. Service providers can provide important counseling services to trafficked persons and their families, with specialized programs for family members, for trafficked persons who have been orphaned or whose spouses have passed away while they were gone. In particular, service providers could develop a formal reintegration program dedicated especially for male trafficking survivors without family; in most places, they only rely on informal assistance, with specialized trafficking programs focusing mainly on women and children.

5 Transition to more empowering and individualized victim assistance.

Assistance provided to trafficked persons should be empowering and driven by the affected person. For example, all of the respondents for this study would have preferred cash to alleviate economic pressures to provide for their families when they return home, so unconditional cash transfers would have been more empowering and more appropriate than in-kind assistance. Cash transfers serve as an empowerment tool, as the survivors are able to use the cash as they see fit and spend it on their most urgent needs and priorities. Where in-kind material assistance is provided, it should take the form of resources to invest in a business or other livelihoods and should be driven by clients' preferences, supported by market-based livelihood

counseling. Service providers should take all precautions not to promise greater assistance than what will be ultimately provided, as this can lead to additional feelings of disempowerment and frustration. Trafficked persons would benefit significantly from much greater efforts from providers to engage them in open discussions about what services are available and how they could be utilized to give them back control of their lives.

Assistance providers could also be more creative in supporting effective post-trafficking options. For example, not all men wanted to return home from Benjina: some would have preferred negotiating better terms for fisheries work, or receiving assistance in obtaining legal papers so they could work elsewhere. Innovative victim assistance programs that are flexible and "smart" enough to support individualized reintegration assistance would be most empowering to victims.

6 Prioritize financial compensation to victims.

Receiving their owed salaries was of the utmost importance to the men, even more so than seeing their traffickers punished under the law. The simple message here is that civil remedies to acknowledge and pay back lost wages to trafficked persons within a reasonable timeframe should be prioritized. Restitution of lost wages would be a significant help in allowing the men to move on with their lives.

7 Work with the private sector to employ these skilled workers.

Former fishers have extensive knowledge about fishing, skills that can translate into successful fishing and fish farming jobs elsewhere. The private sector could play an important role in connecting men that have been trafficked with other fishing-related jobs, which also supports fishing businesses in countries like Thailand since there is a severe labour shortage in the fishing sector. Getting seasoned fishers into safe jobs on fishing boats could be a big win-win for both exploited workers and responsible businesses.

8 Recognize migration as a livelihood strategy; sometimes it is the only viable option.

Many men continue to struggle to find decent employment and are unable to save the money required to rebuild their lives. When first interviewed, not long after they had returned to Myanmar, the men were reluctant to return to Thailand for work. However, as the status update in this paper highlights, over half a year later, some of the men are once again considering migration as the challenges of everyday life in Myanmar proved insurmountable to achieving their life goals. Migration to Thailand may offer more hope than remaining for work in Myanmar. Formal migration channels should be made more accessible, simple, and affordable for migrants workers.

ENDNOTES

1. These men were drawn to the economic livelihood opportunities that Thailand offered. Two respondents were trafficked as children (10 and 14 years old). While several of the men had fished in Myanmar, in and around the Thai border, only one interviewee had been involved in offshore fishing work. For an overview on the worker-broker relationship, see Marshall, P. (2016, September). Slavery Free Recruitment Systems: A Landscape Analysis of Fee-Free Recruitment Systems. Retrieved June 22, 2017, from the Issara Institute website: http://media.wix.com/ugd/5bf36e_47b2c5880148494c88101734aba21d45.pdf.
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3. Anti-Slavery International. Debt bondage: What is debt bondage? Retrieved June 22, 2017, from <https://www.antislavery.org/slavery-today/debt-bondage/>.
4. The exchange rate for THB to USD was 33 to 1 on January 1, 2015, as the respondents were rescued throughout 2015. Retrieved June 22, 2017, from <http://www.xe.com/currencytables/?from=USD&date=2015-01-01>.
5. See Thailand Ministerial Regulation concerning Labour Protection in Sea Fishery Work (2014) B.E. 2557.
6. See the Ministerial Regulations on Labour Protection in Sea Fishery Work (2014) and the Labour Protection Act B.E. 2551 (2008).
7. Prior to December 2014, workers under the age of 18 could be found working legally on fishing boats due to a provision in Thailand's main piece of labour legislation that prohibits the employment of a child under 15 years of age, but allows those under 18 to engage in certain types of work (see The Labour Protection Act B.E. 2551 (2008) Sections 44-52). However, since December 2014, Thai law specifically prohibits the recruitment or employment of all workers under 18 years of age on fishing boats (see the Ministerial Regulation on Labour Protection in Sea Fishery Work (2014), Clause 4).
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11. Trading Economics. Myanmar Minimum Wages 2015-2017. Retrieved June 22, 2017, from <https://tradingeconomics.com/myanmar/minimum-wages>.
12. For additional reading on the benefits of cash transfers to trafficked persons, Lisborg, A. & Issara Institute (2017, May 31). *Towards Demand-driven, empowering assistance for trafficked persons: Making the case for Freedom of Choice over protection at the expense of empowerment*. Retrieved June 22, 2017, from Issara Institute website: https://docs.wixstatic.com/ugd/5bf36e_f6df297d6734cd1a35e74167adf182a.pdf.
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Issara Institute is an independent U.S. not-for-profit corporation based in Thailand, Myanmar, and the United States tackling issues of trafficking and forced labour through data, technology, partnership, and innovation. People—including worker voice and feedback—are at the center of Issara's data and intelligence work, and at Issara Labs we conduct a wide range of research, analytics, and technology development related to human trafficking in global supply chains—the people, the policies, the impact, and how to eliminate it.



RESPONSE TO WRITTEN QUESTIONS SUBMITTED BY HON. BILL NELSON TO
TOMAS J. LARES

Building Partnerships. Florida had the third-highest number of reported cases to the national trafficking hotline in 2016. To strengthen the response to human trafficking, it takes a team approach across many disciplines.

Question 1. How do partnerships like the Greater Orlando Human Trafficking Task Force, Inc. help address the rise in trafficking?

Answer. A collaborative approach is critical to fully address the issue from prevention to identification to restorative care. No single agency can adequately do everything necessary to eliminate human trafficking. For example, the Greater Orlando Human Trafficking Task Force is comprised of many organizations both governmental and non-governmental each tackling a piece of the continuum of care partnering together to make sure nothing or no one slips through the cracks.

We have non-governmental agencies that help increase awareness of the issue. Awareness leads to the prevention of the crime by young people becoming less vulnerable to the lures of traffickers. As educated community members call the National Human Trafficking Hotline, Law Enforcement and care providers receive credible tips that aid investigations that recover victims and arrest traffickers. Once this occurs, the victims are connected with experienced case managers, therapists, and residential programs to receive the care they need. Many agencies are involved in making sure each victim heals and moves from merely surviving to thriving. Meanwhile, Law Enforcement works with Prosecutors to ensure the traffickers receive justice. As we work together seamlessly, each victim receives the care he or she needs to stay safe and we effectively prevent the crime from ever taking place.

Florida Abolitionist, Inc. is a cofounder of the Greater Orlando Human Trafficking Task Force, Inc. who facilitates the quarterly Central Florida Human Trafficking Task Force Leadership Conference Calls, Annual Central Florida Joint Anti-Human Trafficking Forum at Valencia College Public Safety Institute and hosts the Annual Human Trafficking Awareness Day in January.

Question 2. What additional actions can be taken to prevent trafficking from happening in the first place?

Answer. While there are many actions that need to be taken to prevent trafficking from happening in the first place, three come to mind as the most important. First of all, addressing the root cause of economics. Sex trafficking is a problem because there is a demand for purchasing sex. This is a demand that traffickers are happy to supply with victims. However, many times when law enforcement intervenes, the victims are arrested and the purchasers walk free. By significantly increasing the penalties for the commercial sex customer, buying sex will come at a greater risk and we will see the demand decrease. Labor Trafficking is fuel by the demand for cheaper products thus this fuels the supply chain to use compromising sources including domestic and foreign based slave labor.

The second way to decrease demand is to address the public health crisis of pornography. While many in our culture believe it is harmless, men and women are becoming addicted. Neuroscientists have proven that it is as addictive as illegal drugs releasing the same chemicals in the brain. Many commercial sex customers want to live out fantasies they see in pornography, so they pay for it with victims of human trafficking. As the pornography industry gets more and more violent and child pornography increases, the demand for violent fetishes/fantasies and sex with children increases. This demand fuels the fire of human trafficking. By stricter regulations on Internet providers and pornography producers, we can greatly curb the demand for human trafficking.

Third, we need to mandate human trafficking education to children between the ages of 11–17 in the public school system. In the same way “Just Say No” has decreased drug use in America significantly, this education would help young, vulnerable children learn how traffickers manipulate their victims and would prevent many from falling prey to these false promises. Such education would also empower youth to watch out for their friends and help keep them from growing up to exploit others. The Greater Orlando Human Trafficking Task Force, Inc. has created a poster campaign in Central Florida to “Speak Out” at the middle and high school grade levels. Florida Abolitionist, Inc. has established a 30-minute assembly addressing online safety, recruiting tactics of the traffickers and the value of having self-worth and a healthy self-esteem. This assembly is called, “Set Free”. *See poster attachments.

Question 3. How can the Federal Government help states and regions to meet their needs?

Answer. The Federal Government can help address all of the three actions I recommended above with Federal legislation or by strongly encouraging them at the state level for sex, labor and domestic servitude including domestic and foreign-born victims, minors and adult victims and the LGBTQ+ communities who are vulnerable. In addition, for many, if not most, agencies involved in the fight against human trafficking, funds are very limited. Non-governmental agencies operate on shoestring budgets to raise awareness and care for victims. The majority of care providers/stakeholders in Florida are from faith based communities. In addition, funds limit law enforcement agencies. In most cases there are very few investigators of trafficking cases at the local, state, and Federal level. Increased funding across the board would greatly improve efforts to curb this horrible crime. It would provide the tools necessary to prevent and identify human trafficking while providing all the necessary assistance to victims to experience full healing. Orlando and Miami Florida have some of the highest calls in the Nation reporting trafficking, potential trafficking and/or related issues according to the National Human Trafficking Hotline. *See Attachment.



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IS SOMEONE SELLING YOUR SERVICES?

**DID YOU KNOW? HUMAN TRAFFICKING IS USING ANOTHER
PERSON UNFAIRLY FOR SEX OR LABOR TO ANOTHER'S BENEFIT.**

You may already know someone who is involved in human trafficking. If a classmate, peer or friend has been recently branded or tattooed, has unexplained bruises, black eyes, cuts or marks, or if you suspect they are in a controlling relationship, they may be a victim of human trafficking.

speakout
800.423.TIPS
www.speakouthotline.org



Human Trafficking is Modern-Day Slavery – Speakout!

CALL THE SPEAKOUT TIP LINE: 800.423.8477

You will be kept anonymous and could be eligible for a cash reward.

FUNDED WHOLLY OR PARTIALLY BY THE ATTORNEY GENERAL'S CRIME STOPPERS TRUST FUND.



DON'T BE CONTROLLED BY OTHERS

DID YOU KNOW? HUMAN TRAFFICKING IS USING ANOTHER PERSON UNFAIRLY FOR SEX OR LABOR TO ANOTHER'S BENEFIT.

You may already know someone who is involved in human trafficking. If you have a friend who is frequently absent, disengaged, often changing their circle of friends or who runs away, they may be a victim of human trafficking. Modern-day slavery is a serious issue that affects thousands of teens each year without you even knowing.

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SHE ISN'T JUST SKIPPING

REACH OUT AND DO SOMETHING ABOUT IT

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**RANKING OF THE 100 MOST POPULOUS U.S. CITIES
12/7/2007 – 12/31/2016**

OVERVIEW OF THE DATA

The following information is based on incoming communication to the National Human Trafficking Hotline via phone, email, and online tip report from December 7, 2007 – December 31, 2016 about human trafficking cases and issues related to human trafficking in the United States and U.S. territories. The statistics below are representative of calls and cases reported to the National Hotline and should not be taken as a comprehensive report on the scale or scope of human trafficking within each city.

RANKING BY NUMBER OF CALLS

The following statistics are based solely on substantive calls about human trafficking and issues related to human trafficking made to the National Human Trafficking Hotline between December 7, 2007 and December 31, 2016. Substantive calls do not include hang-ups, missed calls, wrong numbers, and calls in which the caller's reason for calling is unknown. Any communication with the hotline regarding topics unrelated to human trafficking is not included in this report.

RANKING BY TOTAL NUMBER OF CALLS			RANKING BY NUMBER OF CALLS PER CAPITA		
RANK	LOCATION	TOTAL # OF CALLS	RANK	LOCATION	# OF CALLS PER 100,000 PEOPLE ¹
1	Houston, Texas	3,634	1	Washington, District of Columbia	401
2	New York, New York	3,074	2	Atlanta, Georgia	317
3	Los Angeles, California	2,803	3	Orlando, Florida	285
4	Washington, District of Columbia	2,730	4	Miami, Florida	271
5	Chicago, Illinois	2,098	5	Las Vegas, Nevada	237
6	Las Vegas, Nevada	1,498	6	Sacramento, California	222
7	Atlanta, Georgia	1,497	7	St. Louis, Missouri	198
8	Columbus, Ohio	1,466	8	Baton Rouge, Louisiana	176
9	Dallas, Texas	1,380	9 ²	Columbus, Ohio	170
10	San Diego, California	1,333	9 ²	Richmond, Virginia	170
11	Miami, Florida	1,228	11	Houston, Texas	158
12	San Francisco, California	1,102	12	Tampa, Florida	155
13	Sacramento, California	1,100	13	Cleveland, Ohio	135
14	Austin, Texas	969	14 ²	Toledo, Ohio	131
15	San Antonio, Texas	866	14 ²	Baltimore, Maryland	131
16	Philadelphia, Pennsylvania	853	16	San Francisco, California	127
17	Seattle, Washington	838	17	Seattle, Washington	119
18	Phoenix, Arizona	823	18	Portland, Oregon	115
19	Baltimore, Maryland	803	19 ²	Pittsburgh, Pennsylvania	112
20	Orlando, Florida	790	19 ²	Fresno, California	112
21	Portland, Oregon	734	21 ²	San Bernardino, California	111
22	Detroit, Michigan	666	21 ²	Cincinnati, Ohio	111
23	Charlotte, North Carolina	655	23	New Orleans, Louisiana	110



RANKING OF THE 100 MOST POPULOUS U.S. CITIES
12/7/2007 – 12/31/2016

24	San Jose, California	653	24	Oakland, California	107
25	Boston, Massachusetts	647	25	Dallas, Texas	105
26	St. Louis, Missouri	617	26	Austin, Texas	102
27	Tampa, Florida	586	27	Lubbock, Texas	101
28	Fresno, California	583	28	Detroit, Michigan	99
29	Denver, Colorado	564	29	Riverside, California	98
30	Cleveland, Ohio	520	30	Boston, Massachusetts	96
31	Louisville, Kentucky	468	31	San Diego, California	95
32	Nashville, Tennessee	467	32	Newark, New Jersey	92
33	Oakland, California	450	33	Stockton, California	91
34	Milwaukee, Wisconsin	432	34	Raleigh, North Carolina	90
35	New Orleans, Louisiana	429	35	Minneapolis, Minnesota	87
36	Raleigh, North Carolina	415	36	Santa Ana, California	85
37	Indianapolis, Indiana	405	37 ²	St. Petersburg, Florida	83
38 ²	Kansas City, Missouri	400	37 ²	Kansas City, Missouri	83
38 ²	Baton Rouge, Louisiana	400	39	Denver, Colorado	81
40	Richmond, Virginia	379	40	Tulsa, Oklahoma	80
41	Fort Worth, Texas	378	41 ²	Charlotte, North Carolina	78
42	Oklahoma City, Oklahoma	377	41 ²	Chicago, Illinois	78
43	Toledo, Ohio	365	43	Louisville, Kentucky	76
44	Minneapolis, Minnesota	360	44 ²	St. Paul, Minnesota	73
45	Pittsburgh, Pennsylvania	340	44 ²	Milwaukee, Wisconsin	73
46	Cincinnati, Ohio	331	46	Nashville, Tennessee	71
47	Tulsa, Oklahoma	324	47	Los Angeles, California	70
48	Jacksonville, Florida	320	48	Lexington, Kentucky	68
49	Riverside, California	319	49 ²	Bakersfield, California	64
50	Albuquerque, New Mexico	291	49 ²	San Jose, California	64
51	Santa Ana, California	283	51	Wichita, Kansas	61
52	Stockton, California	280	52 ²	Oklahoma City, Oklahoma	59
53	Tucson, Arizona	265	52 ²	Aurora, Colorado	59
54	Newark, New Jersey	260	54 ²	San Antonio, Texas	58
55	Colorado Springs, Colorado	257	54 ²	Anaheim, California	58
56	Lubbock, Texas	256	56	Omaha, Nebraska	57
57	Omaha, Nebraska	255	57	Durham, North Carolina	56
58	Memphis, Tennessee	247	58 ²	Colorado Springs, Colorado	55
59	Bakersfield, California	242	58 ²	Honolulu, Hawaii	55
60	San Bernardino, California	241	60	Philadelphia, Pennsylvania	54
61	El Paso, Texas	240	61	Albuquerque, New Mexico	52
62	Wichita, Kansas	237	62 ²	Phoenix, Arizona	51
63	St. Paul, Minnesota	220	62 ²	Reno, Nevada	51



RANKING OF THE 100 MOST POPULOUS U.S. CITIES
12/7/2007 – 12/31/2016

64 ²	Lexington, Kentucky	217	64	Tucson, Arizona	50
64 ²	St. Petersburg, Florida	217	65	Buffalo, New York	49
66	Aurora, Colorado	213	66	Boise City, Idaho	48
67	Anaheim, California	203	67 ²	Indianapolis, Indiana	47
68	Honolulu, Hawaii	194	67 ²	Greensboro, North Carolina	47
69	Long Beach, California	193	69	Jersey City, New Jersey	45
70	Virginia Beach, Virginia	192	70	Fort Worth, Texas	44
71	Arlington, Texas	155	71	Virginia Beach, Virginia	42
72	Durham, North Carolina	148	72 ²	Long Beach, California	41
73	Greensboro, North Carolina	135	72 ²	Corpus Christi, Texas	41
74	Corpus Christi, Texas	133	74	Laredo, Texas	40
75	Buffalo, New York	126	75 ²	Arlington, Texas	39
76	Reno, Nevada	124	75 ²	Irvine, California	39
77	Jersey City, New Jersey	118	77 ²	Norfolk, Virginia	38
78	Anchorage, Alaska	113	77 ²	Anchorage, Alaska	38
79 ²	Boise City, Idaho	107	77 ²	Memphis, Tennessee	38
79 ²	Irvine, California	107	80 ²	Jacksonville, Florida	36
81 ²	Mesa, Arizona	103	80 ²	Madison, Wisconsin	36
81 ²	Laredo, Texas	103	80 ²	New York, New York	36
83	Lincoln, Nebraska	95	83	El Paso, Texas	35
84	Norfolk, Virginia	94	84	Lincoln, Nebraska	34
85	Madison, Wisconsin	91	85	Winston-Salem, North Carolina	29
86 ²	Plano, Texas	71	86	Garland, Texas	26
86 ²	Winston-Salem, North Carolina	71	87 ²	Fremont, California	25
88	Garland, Texas	61	87 ²	Plano, Texas	25
89	Glendale, Arizona	59	89 ²	Glendale, Arizona	24
90	Fremont, California	58	89 ²	Irving, Texas	24
91	Irving, Texas	56	91	Mesa, Arizona	21
92	Fort Wayne, Indiana	51	92	Fort Wayne, Indiana	19
93 ²	Henderson, Nevada	36	93	Scottsdale, Arizona	15
93 ²	Scottsdale, Arizona	36	94	Chesapeake, Virginia	13
95	Chesapeake, Virginia	32	95	Henderson, Nevada	12
96	Chula Vista, California	19	96	Gilbert, Arizona	8
97	Gilbert, Arizona	18	97 ²	Hialeah, Florida	7
98 ²	Chandler, Arizona	17	97 ²	Chula Vista, California	7
98 ²	Hialeah, Florida	17	97 ²	Chandler, Arizona	7
100	North Las Vegas, Nevada	7	100	North Las Vegas, Nevada	3

¹Calculations of Calls per Capita were conducted using the July 1, 2016 Population estimates from the U.S. Census Bureau. These estimates are available at <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>.
²In cases of a tie in either total calls or calls per capita, rankings were duplicated.



RANKING OF THE 100 MOST POPULOUS U.S. CITIES
12/7/2007 – 12/31/2016

RANKING BY NUMBER OF CASES

The following statistics include cases created by the National Human Trafficking Hotline. A case is a unique report, situation, or request for resources that originated as a signal to the National Human Trafficking Hotline. Each case has at least one signal (call, online tip report, or email) associated with it. Cases may have multiple signals and/or multiple signalers based on the details of the case. Each case included in this report was evaluated for evidence of potential human trafficking and was determined to have either high or moderate indicators of human trafficking.

RANKING BY TOTAL NUMBER OF CASES			RANKING BY NUMBER OF CASES PER CAPITA		
RANK	LOCATION	TOTAL # OF CASES	RANK	LOCATION	# OF CASES PER 100,000 PEOPLE ¹
1	Houston, Texas	1,021	1	Washington, District of Columbia	87
2	Los Angeles, California	884	2	Atlanta, Georgia	84
3	New York, New York	759	3	Orlando, Florida	83
4	Washington, District of Columbia	596	4	Miami, Florida	80
5	Chicago, Illinois	507	5	Las Vegas, Nevada	79
6	Las Vegas, Nevada	499	6	Sacramento, California	59
7	Atlanta, Georgia	399	7 ^a	Houston, Texas	44
8	Dallas, Texas	370	7 ^a	Tampa, Florida	44
9	Miami, Florida	364	9 ^a	Columbus, Ohio	41
10	Columbus, Ohio	356	9 ^a	Baton Rouge, Louisiana	41
11	San Diego, California	335	11	Oakland, California	40
12	San Francisco, California	302	12 ^a	Baltimore, Maryland	39
13	Sacramento, California	294	12 ^a	New Orleans, Louisiana	39
14	Baltimore, Maryland	240	14 ^a	St. Louis, Missouri	35
15	Orlando, Florida	230	14 ^a	San Francisco, California	35
16	Phoenix, Arizona	229	16	Detroit, Michigan	33
17	Detroit, Michigan	223	17	Cincinnati, Ohio	31
18	Philadelphia, Pennsylvania	202	18 ^a	Toledo, Ohio	30
19	Portland, Oregon	188	18 ^a	Fresno, California	30
20	San Jose, California	184	18 ^a	San Bernardino, California	30
21	Austin, Texas	183	21 ^a	Portland, Oregon	29
22	Seattle, Washington	181	21 ^a	Cleveland, Ohio	29
23	San Antonio, Texas	174	23	Dallas, Texas	28
24	Oakland, California	170	24	Richmond, Virginia	27
25	Tampa, Florida	165	25	Seattle, Washington	26
26	Fresno, California	155	26	San Diego, California	24
27	Boston, Massachusetts	154	27 ^a	Kansas City, Missouri	23
28	New Orleans, Louisiana	151	27 ^a	Newark, New Jersey	23
29	Charlotte, North Carolina	141	27 ^a	Boston, Massachusetts	23
30	Denver, Colorado	133	30 ^a	Los Angeles, California	22



RANKING OF THE 100 MOST POPULOUS U.S. CITIES
12/7/2007 – 12/31/2016

31	Oklahoma City, Oklahoma	130	30 ^d	Riverside, California	22
32	Indianapolis, Indiana	122	32 ^d	Pittsburgh, Pennsylvania	21
33	Kansas City, Missouri	113	32 ^d	Minneapolis, Minnesota	21
34	Milwaukee, Wisconsin	112	32 ^d	Reno, Nevada	21
35 ^d	Cleveland, Ohio	110	35 ^d	Honolulu, Hawaii	20
35 ^d	St. Louis, Missouri	110	35 ^d	Oklahoma City, Oklahoma	20
37	Louisville, Kentucky	98	35 ^d	Stockton, California	20
38 ^d	Memphis, Tennessee	94	35 ^d	Bakersfield, California	20
38 ^d	Cincinnati, Ohio	94	35 ^d	Santa Ana, California	20
38 ^d	Baton Rouge, Louisiana	94	40 ^d	Austin, Texas	19
41	Fort Worth, Texas	90	40 ^d	Denver, Colorado	19
42	Jacksonville, Florida	89	40 ^d	Milwaukee, Wisconsin	19
43	Minneapolis, Minnesota	87	40 ^d	Chicago, Illinois	19
44	Nashville, Tennessee	83	44 ^d	Anaheim, California	18
45	Toledo, Ohio	83	44 ^d	San Jose, California	18
46	Albuquerque, New Mexico	79	44 ^d	Tulsa, Oklahoma	18
47 ^d	Colorado Springs, Colorado	75	47	Charlotte, North Carolina	17
47 ^d	Bakersfield, California	75	48 ^d	Colorado Springs, Colorado	16
49 ^d	Tulsa, Oklahoma	72	48 ^d	Louisville, Kentucky	16
49 ^d	Honolulu, Hawaii	72	50 ^d	Raleigh, North Carolina	15
49 ^d	Riverside, California	72	50 ^d	Greensboro, North Carolina	15
52	Raleigh, North Carolina	71	50 ^d	Wichita, Kansas	15
53	Santa Ana, California	66	53 ^d	Lexington, Kentucky	14
54	Newark, New Jersey	65	53 ^d	Memphis, Tennessee	14
55 ^d	Pittsburgh, Pennsylvania	64	53 ^d	Indianapolis, Indiana	14
55 ^d	San Bernardino, California	64	53 ^d	Phoenix, Arizona	14
57	Anaheim, California	63	53 ^d	St. Petersburg, Florida	14
58	Stockton, California	62	53 ^d	Albuquerque, New Mexico	14
59	Richmond, Virginia	61	53 ^d	Durham, North Carolina	14
60 ^d	Long Beach, California	58	60 ^d	Buffalo, New York	13
60 ^d	Omaha, Nebraska	58	60 ^d	Omaha, Nebraska	13
62	Wichita, Kansas	57	60 ^d	St. Paul, Minnesota	13
63	Virginia Beach, Virginia	52	60 ^d	Philadelphia, Pennsylvania	13
64	Reno, Nevada	51	60 ^d	Jersey City, New Jersey	13
65	Tucson, Arizona	48	60 ^d	Norfolk, Virginia	13
66	Lexington, Kentucky	46	60 ^d	Nashville, Tennessee	13
67	El Paso, Texas	45	67 ^d	Long Beach, California	12
68	Greensboro, North Carolina	42	67 ^d	San Antonio, Texas	12
69	St. Paul, Minnesota	39	69 ^d	Virginia Beach, Virginia	11
70 ^d	Corpus Christi, Texas	37	69 ^d	Corpus Christi, Texas	11



RANKING OF THE 100 MOST POPULOUS U.S. CITIES
12/7/2007 – 12/31/2016

70 ^a	St. Petersburg, Florida	37	69 ^d	Irvine, California	11
72	Durham, North Carolina	36	69 ^d	Fort Worth, Texas	11
73 ^a	Jersey City, New Jersey	34	73 ^d	Jacksonville, Florida	10
73 ^a	Buffalo, New York	34	73 ^d	Madison, Wisconsin	10
75 ^d	Mesa, Arizona	31	75 ^d	Tucson, Arizona	9
75 ^d	Arlington, Texas	31	75 ^d	Laredo, Texas	9
75 ^d	Norfolk, Virginia	31	75 ^d	New York, New York	9
78	Irvine, California	29	78 ^d	Garland, Texas	8
79 ^a	Aurora, Colorado	24	78 ^d	Arlington, Texas	8
79 ^a	Madison, Wisconsin	24	78 ^d	Glendale, Arizona	8
81	Laredo, Texas	23	78 ^d	Lubbock, Texas	8
82	Lincoln, Nebraska	21	82 ^d	Lincoln, Nebraska	7
83 ^a	Anchorage, Alaska	19	82 ^d	Aurora, Colorado	7
83 ^a	Lubbock, Texas	19	82 ^d	El Paso, Texas	7
83 ^a	Glendale, Arizona	19	85 ^d	Fremont, California	6
83 ^a	Garland, Texas	19	85 ^d	Fort Wayne, Indiana	6
87	Fort Wayne, Indiana	17	85 ^d	Mesa, Arizona	6
88 ^a	Scottsdale, Arizona	15	85 ^d	Anchorage, Alaska	6
88 ^a	Fremont, California	15	85 ^d	Boise City, Idaho	6
90 ^a	Winston-Salem, North Carolina	14	85 ^d	Scottsdale, Arizona	6
90 ^a	Irving, Texas	14	85 ^d	Chesapeake, Virginia	6
90 ^a	Chesapeake, Virginia	14	85 ^d	Irving, Texas	6
90 ^a	Boise City, Idaho	14	85 ^d	Winston-Salem, North Carolina	6
94 ^a	Plano, Texas	9	94 ^d	Chula Vista, California	3
94 ^a	Chula Vista, California	9	94 ^d	Chandler, Arizona	3
96	Chandler, Arizona	8	94 ^d	Plano, Texas	3
97 ^a	Gilbert, Arizona	6	94 ^d	Hialeah, Florida	3
97 ^a	Hialeah, Florida	6	94 ^d	Gilbert, Arizona	3
99 ^a	Henderson, Nevada	Redacted ^b	99 ^a	Henderson, Nevada	Redacted ^b
99 ^a	North Las Vegas, Nevada	Redacted ^b	99 ^a	North Las Vegas, Nevada	Redacted ^b

^aCalculations of Cases per Capita were conducted using the July 1, 2016 Population estimates from the U.S. Census Bureau. These estimates are available at <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>.

^bIn cases of a tie in either total cases or cases per capita, rankings were duplicated.

^cTo protect the identity of the people we serve, the National Human Trafficking Hotline does not disclose exact statistics related to cities referenced fewer than three times.



**RANKING OF THE 100 MOST POPULOUS U.S. CITIES
12/7/2007 – 12/31/2016**

Important Notes:

¹Each situation of trafficking reported to the National Human Trafficking Hotline was assessed for indicators of human trafficking and was found to have at least moderate- or high-level indicators. Assessments are made based on the information reported to the hotline. The National Hotline is not able to verify the accuracy of reported information.

²These statistics are accurate as of June 6, 2017. They may be subject to change as new information emerges.

³The rankings above are based only on a comparison of the top 100 most populous U.S. cities. Numbers of calls and cases from less populous cities were not taken into consideration. The 100 most populous U.S. cities were determined using the July 1, 2016 population estimates from the U.S. Census Bureau. These estimates were obtained from <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk> on May 31, 2017.