

Co-funded by the Prevention of and Fight against Crime
Programme of the European Commission



Combat Trafficking in Human Beings
Stage One Research Findings
September 2015

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Stage One: Research Findings

The aim of the research at this stage was to identify the vulnerabilities of hospitality and tourism businesses to the threat of human trafficking and to collect best practices in the identification and response to human trafficking. Qualitative interviews were conducted with key informants in different industry sectors in the UK, Romania and Finland. An overview of the findings from this stage is presented below by country before a cross-country overview is presented.

The UK

At this stage ten (10) interviews were conducted with representatives of the hospitality and tourism industry (4), law enforcement - including private security experts (4), NGOs (9) and supply chain consultants (1).

The findings identify a lack of recognition of the problem, and/or size of the problem of human trafficking within the UK hotel industry. They also identify an apparent confusion between trafficking for sexual exploitation purposes and prostitution within hotels. It would appear that it is the larger hotel groups that recognise the problem of human trafficking for both labour and sexual purposes. However, recent events in the UK have developed localised awareness of the issue – mainly sexual exploitation of underage persons (e.g., South Yorkshire, Oxfordshire). In these areas, where much publicity was given to the problem, local hoteliers (from independent hotels and B&Bs) and law enforcement have undertaken collaborative initiatives involving training and communication networking to combat human trafficking (Hotel Watch case in West Oxfordshire; Institute of Hospitality's partnership with South Yorkshire Police for webinars and guidance). It is noteworthy that larger hotel owners also start taking action in collaboration with anti-trafficking charities (case of Shiva Hotels with Unseen). However, while there is evidence that these organisations are working alongside other professional associations in an effort to address the problem, much of the focus to date has been on the trafficking of children rather than on the full range of human trafficking forms.

The findings also suggest that the UK hotel industry remains vulnerable to human trafficking as a result of the current business models adopted, predominantly when they outsource some of their functions to contractors or agencies (housekeeping, cleaning services, garden maintenance, building works). Lack of control in the case of franchised properties where owners are free to make their own decisions in terms of employment practices, procurement and overall operational practices increase the vulnerability of brands that have franchising as opposed to full ownership or management contracts as their main business model as it creates a gap between corporate policy and unit-level practice, including adequate reporting procedures. It was also reported that the cultural and language diversity in hotel staff combined with low pay and skills levels can exacerbate reporting problems. The high turnover of un-skilled personnel and the lax in employee background checks by HR departments also expose the industry to the risk of human trafficking by criminal rings using employment of trafficked victims for fraudulent activities within the organisation. Online automated reservation systems are another point of the industry's vulnerability as traffickers use the automated reservation confirmations to issue visas for their victims. Finally, the industry remains vulnerable due to the complex and opaque nature of supply chains and the

lack of clear and effective audit procedures to ensure compliance with any policies set to mitigate trafficking.

This stage of the research also yielded 10 clear cases of trafficking which fall outside the 'usual' reports of labour and sexual exploitation and demonstrate a high level of sophistication in the organisation of traffickers and how victims are exploited.

Romania

Nine (9) interviews were conducted with representatives from the hospitality and tourism industry (3), law enforcement (2), recruitment agencies (1) and anti-THB organisations and charities (3).

As in UK, the findings identify a wider lack of awareness of the problem of human trafficking within hospitality and tourism, particularly that of labour exploitation. To date there has been no registered criminal investigation on trafficking within the hospitality industry in Romania. However, there was clear recognition of prostitution (rather than sexual exploitation per se) within the industry using established networks comprised of those working within hotels and complementary industry sectors (such as taxi drivers but also law enforcement). These networks operate according to a defined language 'code' and members share the proceeds. Victims' distrust of the police, who may be complicit in organised activities, serve to enhance the vulnerability of hotels to human trafficking within Romania as reporting effectiveness becomes questionable. Again, like in UK, traffickers are using reservation confirmations to issue visas for victims they bring in the country in order to forward them to other destinations. The situation in some cases seems out of control with hotels reported for hiring 'hostesses' to meet and greet customers but later forcing them to offer services of different kind. There is a ring of hospitality businesses (hotels and restaurants) that work with membership and only accept customers that are referred by their members. This ring is known to use often trafficked victims for sexual exploitation. In general, human trafficking is usually linked with small hotels that offer their rooms 'by the hour'. However noteworthy, and evidence of lack of control between big hotel brands and hotel owners, is the case of an internationally branded hotel working with 'Save the Children' and with anti-trafficking literature (on child sexual exploitation) in its reception and public spaces but with pimps knocking at guestroom doors offering services of minors. Other forms of human trafficking in hotels were not reported with the exception perhaps of labour exploitation in hotel construction sites of Asian personnel working and living in dire conditions.

There is more recognition of the vulnerability of people moving outside of Romania to work within the hotel industry to traffickers. The low salaries paid within the industry within Romania encourage this migration, and the low level of education of victims leaves them vulnerable to unscrupulous recruitment agencies. Due to lack of control and lax legislation, human traffickers often trick their victims by posing as legitimate and properly authorised agencies and capturing a wide range of victims promising hospitality jobs in western European countries.

Finland

Ten interviews were conducted in Finland with representatives of the hospitality and tourism industry as well as law enforcement.

The findings reveal that human trafficking within the hotel industry in Finland is considered a rare phenomenon, although there is some recognition amongst informants of victims from specific countries (Nigeria, Eastern European and Asian countries) being exploited for labour within the broader sectors of hospitality and tourism. Many of these victims are reported to have also been victimised prior to their arrival in Finland. There is also recognition of sexual exploitation within the accommodation sector, including hotels, motels and apartment-hotels, however the distinction between trafficking for the purposes of sexual exploitation and prostitution is not always clear.

The vulnerabilities of hospitality and tourism organisations to labour exploitation in Finland appear to relate to a lack of understanding by international victims of the law and their rights. The findings suggest that smaller and independent accommodation properties (apart-hotels) and those reliant on self-service mechanisms for checking guests in and out of accommodation, are more vulnerable to being used for sexual exploitation purposes than larger chains. There is a general consensus though that human trafficking for labour exploitation in Finland takes place more in ethnic restaurants rather than in hotels. An interesting case of labour exploitation in the hotel sector was the use of foreign exchange students as cleaning staff in certain accommodations. The use of predominantly Eastern European 'students' for considerably underpaid positions in hotels in the form of 'industrial placement' procured by agencies of dubious credentials has been reported also in other countries (Germany, France, Italy and Greece). A lack of awareness of human trafficking and a lack of training in the identification and reporting of victims enhance the vulnerability of the sector overall.

Three clear cases of human trafficking were identified through this stage of the research. These cases involve victims who were trafficked to Finland for exploitation and those from outside of Finland exploiting current legislation to enter Finland for the purposes of trafficking. The cases identified demonstrate a high level of planning and sophistication, particularly when operated from outside of the country.

Cross-country Overview

Across the three countries, it would appear that there is a lack of awareness of the problems of human trafficking within the hospitality and tourism sectors. Additionally, there is also confusion between human trafficking for sexual exploitation purposes and prostitution. The latter is recognised as an ongoing practice within hotels, which may be supported by employees within hotels. However, this acceptance of prostitution within hotels may serve to mask whether there may be victims of trafficking involved.

The hospitality and tourism industries also remain vulnerable to trafficking given the current business models adopted which separate hotel ownership from hotel management and the characteristics of certain hotel properties (e.g. use of technology; low staffing levels). In addition the reliance on a culturally-diverse workforce with lower levels of education and/or skills who may be outsourced to employment agencies increases this vulnerability.

This stage of the research has also revealed the high levels of sophistication of traffickers, the complexity of their networks and their ability to work across international borders. While there is some evidence of larger hospitality and tourism organisations working towards combatting human trafficking, the findings identify that there is still much work to be done to

create awareness of human trafficking, to develop effective training tools to identify potential victims and to develop clear reporting and auditing procedures.