



On-Ramps, Intersections, and Exit Routes:

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

 **Polaris**

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Acknowledgements

Lead Researcher and Author:

Brittany Anthony,

Manager of Strategic Research at Polaris

Contributing Survivor Authors:

A'ishah H. Amatullah	Ronny Marty
Julia Anderson	Tajuan McCarty
Efraín Freddy Pérez Arias	Moninda
N.M.B.	Audrey Morrissey
Jessa Dillow Crisp	Ranela P. Placides
Laurin Crosson	Caroline Pugh-Roberts
Harold D'Souza	Jamie Rosseland
Hazel Fasthorse	Ella Smillie
Jo Hollis	Tanya Street
Danielle John	Victoria Thompson
Nancy Johnson	Sawan Vaden
Tiffany Liles	Courtney Wendell
Fainess Lipenga	Shandra Woworuntu
Megan Lundstrom	

Additional contributing survivor authors who chose to remain anonymous.

Other Key Contributing Researchers & Authors:

Of Polaris: Sara Crowe, Caren Benjamin, Therese Couture, Elaine McCartin, Elizabeth Gerrior, Lillian Agbeyegbe, and Mary Kate Kosciusko.

Of Truckers Against Trafficking: Lyn Leeburg
Of HEAL Trafficking: Dr. Hanni Stoklosa

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Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Typology of Modern Slavery

A Summary

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

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




HT = Human Trafficking | LE = Labor Exploitation¹

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

HT = Human Trafficking | LE = Labor Exploitation¹

Systemic Change Matrix

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

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

Methodology

Hotline Data

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

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

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

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

A Note about Language:

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

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

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

Cases of Potential Human Trafficking

(December 7, 2007 - December 31, 2017)

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

Individual Potential Victim Profiles

(January 1, 2015 - December 31, 2017)

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

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

Polaris Survivor Survey

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

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

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

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

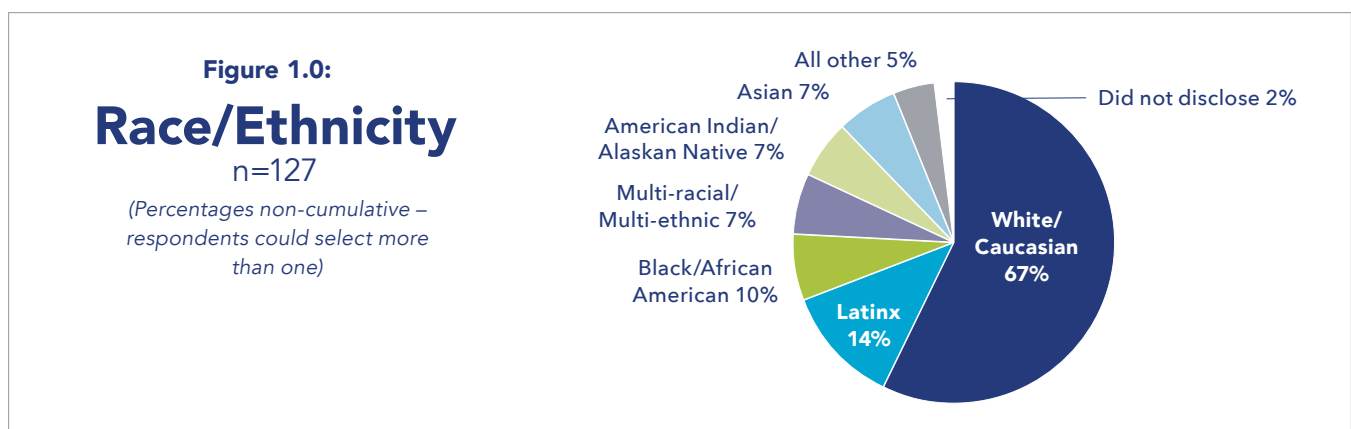


Figure 1.1:
Gender

n=127

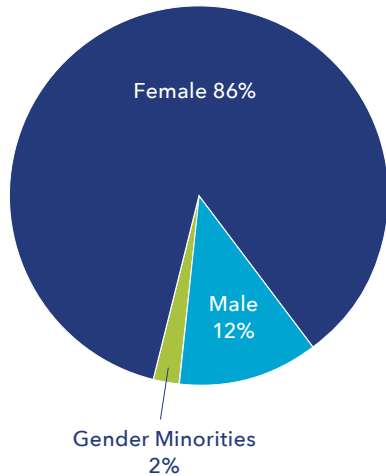


Figure 1.2:
Age at trafficking entry

n=127

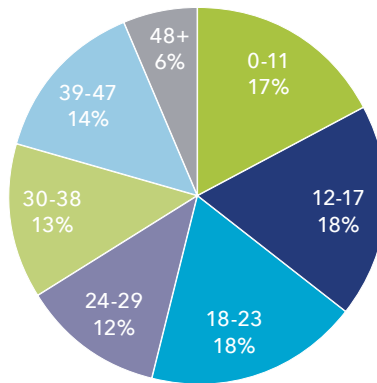


Figure 1.3:
Immigration Status

n=126*

*One respondent did not answer.

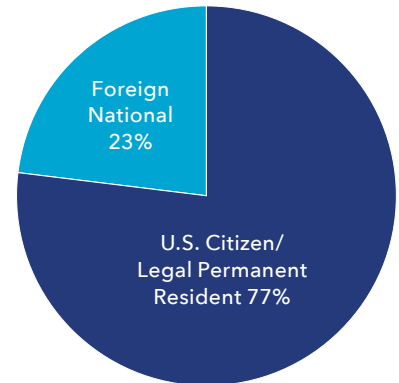
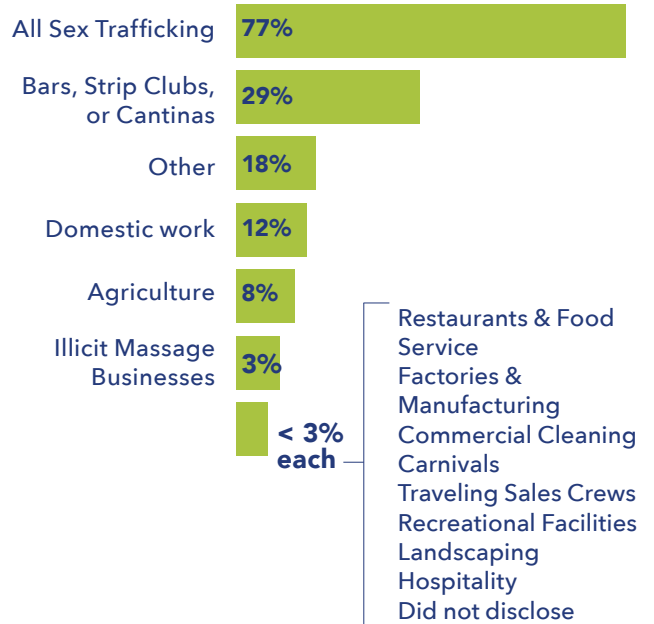


Figure 1.4:
Types of Trafficking
n=127

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

Figure 1.5:
Types of Trafficking
n=127



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

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

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

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

Example Screening Question:

Trafficking Survivor Experiences with Systems & Industries

Hotels & Motels

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

Yes

No

Not sure

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Figure 1.6: Survey Sections

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

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

Survey Limitations

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

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

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

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

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

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

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

Polaris Focus Groups

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

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

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

Sex trafficking Groups:

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

Labor Trafficking Groups:

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

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

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

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

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

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

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

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

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

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



Social Media

Social Media



The following matrix is meant to be an overview of some of the intersections that diverse social media platforms may have with victims and traffickers of various types of trafficking (See [Typology of Modern Slavery: A Summary](#) section of this report). Each dot can represent one or more touch points throughout a trafficking life cycle including during recruitment, to facilitate advertising, abuse, or overall business operations, or to support survivors during or after their trafficking experiences. All intersections were informed by Polaris’s operation of the National Human Trafficking Hotline since 2007, Polaris survivor survey, Polaris focus groups, or additional, but not exhaustive, external research and analysis which may include service provider and stakeholder knowledge sharing, scholarly research, media articles, documented civil and/or criminal cases of human trafficking, or analysis of external data sets and/or public records. This matrix is by no means comprehensive, as potential traffickers and victims have the potential to access many social media platforms. The absence of a dot may mean there is insufficient data or research on the intersection. Polaris omitted the types of trafficking where research and data were lacking.

“Technology is being used [to hurt us]. Why can’t we use technology as a way to get resources to survivors?”

		Types of Social Media Platforms					
		Facebook	Instagram	Snapchat	Chat apps (Kik, KakaoTalk, WeChat, WhatsApp)	Dating Sites & Apps	YouTube
Types of Trafficking	Agriculture & Animal Husbandry	●			●		●
	Arts, Sports, & Entertainment	●	●				
	Bars, Strip Clubs, & Cantinas	●	●				●
	Domestic Work	●			●		
	Escort Services	●	●	●	●	●	
	Illicit Massage Businesses	●	●		●		
	Outdoor Solicitation	●	●	●			
	Personal Sexual Servitude	●	●	●	●	●	
	Pornography	●	●		●		●
	Remote Interactive Sexual Acts			●	●	●	
	Restaurants & Food Service	●			●		
	Traveling Sales Crews	●	●	●			●

Over the last two decades, the internet has dramatically reshaped how we buy and sell literally everything – including each other. With a credit card and a couple of clicks, anyone can shop for virtually anything they want, from the comfort and privacy of their own homes. In the commercial sex realm, this ease of access has created at least the appearance of a massively expanded marketplace. Federal legislation passed in April 2018 cracking down on the online facilitation of prostitution may reshape that marketplace, but is unlikely to end it. And because trafficking is a business, and the laws of supply and demand apply, it would then stand to reason that the explosion of advertising options on the internet have led to more sex trafficking. But we do not know for sure whether someone who buys sex from an escort service via an online classified ad would not have sought out a similar service from the Yellow Pages, a printed circular, or the street.

What we do know is that the internet has forever blurred the once bright lines between the social and the commercial and that traffickers have taken notice and adjusted their business models accordingly. The most obvious example is the creation of a whole new product for human traffickers to sell – remote, interactive sexual acts streamed directly to individual purchasers. But every aspect of the trafficking business has been to some extent adjusted to exploit the opportunities for expansion afforded by social media.

While this section briefly addresses intersections of human trafficking with platforms like classified sites and consumer review sites, which have some “social” aspects, the majority of focus is on what most internet users understand to be “social media” – online platforms whose intended purpose is to foster the connection of people to share ideas, interests, and information. This has some crossover. A site like Craigslist, for example, at one point offered both transactional commercial sex advertisements as well as a forum for people looking to form romantic relationships.

Understanding how both human traffickers, victims and survivors interact with social media as it is commonly understood – Facebook, Twitter, Instagram, etc. – offers a new realm of insights that are potentially more actionable for a wider range of players, from trafficking victims looking for help, to law enforcement seeking to disrupt trafficking networks, to technology companies looking to keep their users safe on their platforms. Human trafficking, like technology, is a dynamic business, endlessly innovative and infinitely adaptable. Only by understanding how these two sectors interact can we get the best out of the one and begin to shut down the other.

How Social Media may be Used in Recruitment

The National Human Trafficking Hotline has recorded recruitment in all types of both sex and labor trafficking on mainstream social media platforms including, but not limited to, Facebook, Instagram, Snapchat, Kik, Meetme.com, WhatsApp, and dating sites/apps like Plenty of Fish, Tinder, and Grindr.

Potential victims who have contacted the National Hotline have also been tricked into trafficking through job advertisements on commercialized websites like Craigslist. Voluntary individuals in the commercial sex industry, who had been operating independently, have been recruited into being under a trafficker's control through Backpage.com.

Online recruitment has existed for as long as there has been widespread access to internet platforms. Sex trafficking survivors who attended Polaris focus groups

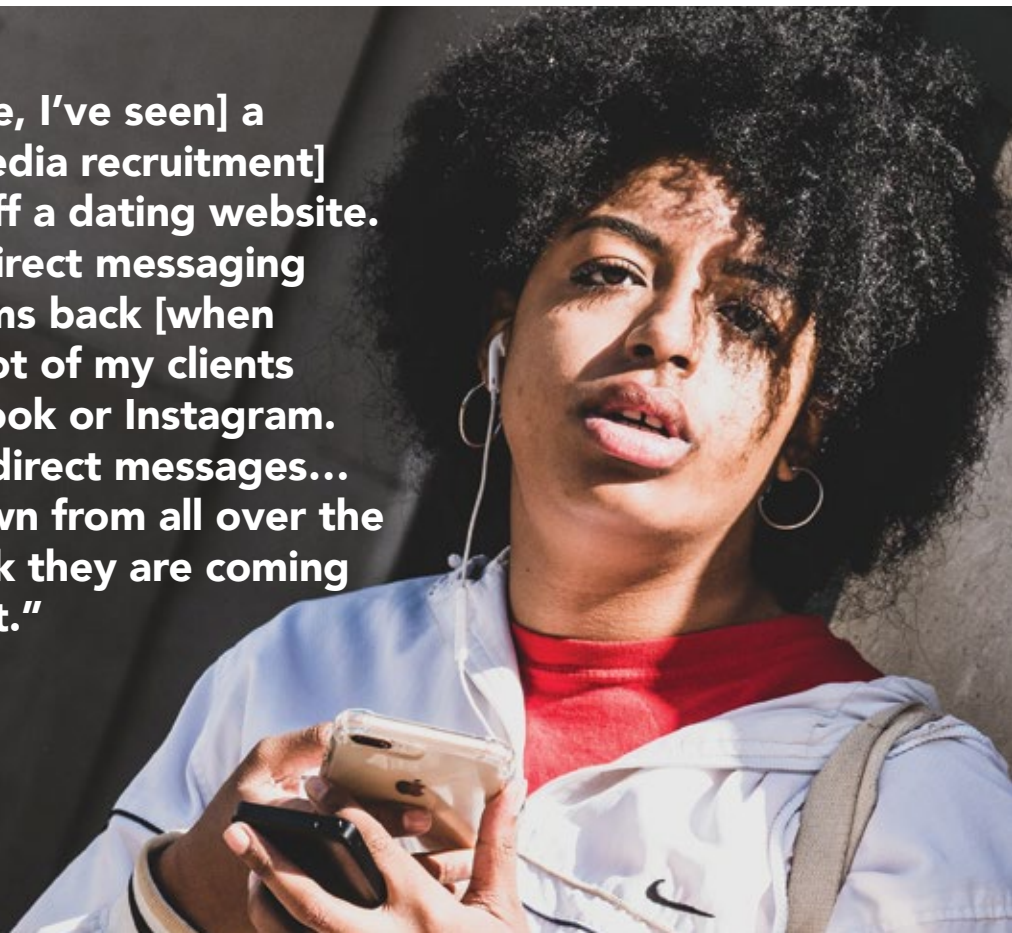
and who were trafficked in types such as escort services, outdoor solicitation, remote interactive sexual acts, pornography, and in strip clubs and bars, even discussed their common experience of being recruited on MySpace in the early-mid 2000's.

Today, the options have expanded.

By way of scope, case data from January 2015 through December 2017 records 845 potential victims recruited on internet platforms. This includes:

- 250 potential victims recruited on Facebook,
- 120 recruited on a dating site,
- 78 recruited on Instagram,
- 489 recruited on another type of Internet platform such as Craigslist, chat rooms, or a website that could not be identified during the hotline call.⁸

"[As a survivor advocate, I've seen] a huge influx [of social media recruitment] now... I was recruited off a dating website. I don't think they had direct messaging on social media platforms back [when I was recruited]. But a lot of my clients are recruited off Facebook or Instagram. [Recruiters] send them direct messages... I have girls who are flown from all over the country... and they think they are coming to see a modeling agent."



Online Relationship Recruitment

Trafficking by an individual – generally a pimp or an intimate partner – often begins with the trafficker and potential victim building a relationship through social media. Contact and ensuing conversations take numerous forms but generally follow patterns. There are few instances where some individual sex traffickers will capitalize on the anonymity of the internet and use fake profiles to conceal their true identity, or impersonate their bottom girl (a term some pimps use to refer to a victim still under their control but who has “earned” a higher ranking among the other potential victims). However, more often than not, cases from the National Hotline show many traffickers have no qualms about using their own personal social media profiles for recruitment communication. Unfortunately, for most victims, that’s where the truth about who their traffickers are ends.

Online recruitment may begin with commenting on potential victims’ photos and sending direct messages, carefully building the rapport and intimacy needed to entice victims into a false sense of trust. The next phase is often “boyfriending” – manipulations such as feigned romantic interests, extreme flattery, promises of gifts or other financial assistance, assurance that they, and they alone can care for the potential victim, or even perceived salvation from domestic violence or child sexual abuse.

In these cases, the online relationship will generally culminate with the trafficker purchasing travel tickets for the potential victim in order to finally unite face-to-face.

In a slightly different and accelerated version of this recruitment model, geography is factored in before the online relationship begins. Traffickers can connect with potential victims using location-based apps such as Meetme.com, Grindr, or Tinder. Victims use these apps for their intended purpose, to seek out a potential romantic partner. But some vulnerable youth, struggling with issues such as homelessness, previous victimization, or alcohol and/or substance use, also use the apps to seek out someone with the means to provide them with what they need to survive. As with any commercial sex situation, survival sex exists on a spectrum. It can be voluntary (with adults 18+), involve

some exploitative conditions, or constitute sex trafficking in the form of personal sexual servitude if the exploiter begins to coerce the victim (often a minor) with money, drugs, transportation, shelter, food, gifts, etc. all while typically employing elements of control over his or her day-to-day life.

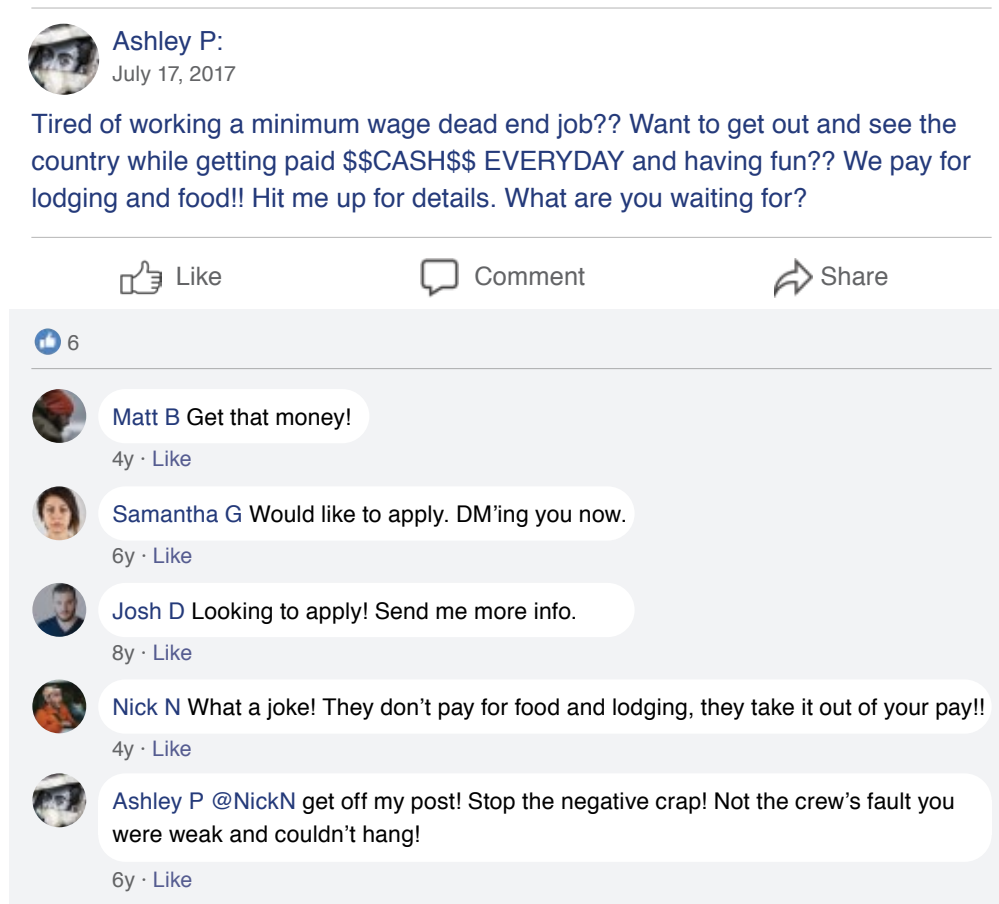
Online Fake or Deceptive Job Recruitment

The ability to tightly target a desirable audience also makes social media an ideal venue for serving deceptive or fraudulent job advertisements to a vulnerable population. Some individual sex traffickers will recruit victims through an illegitimate job offer for modeling or dancing, sometimes facilitated through fake business profiles, event pages on Facebook, or on Craigslist. Traffickers may also contact the potential victim directly, claiming to be a recruiter for a modeling agency or the owner of another kind of legitimate business seeking staff. Often these interactions also include some elements of building trust and a relationship online before the actual job offer is made.

In Polaris’s research into recruitment within the context of illicit massage businesses (IMBs), WeChat and KakaoTalk, immensely popular platforms among Chinese and Korean users respectively, were cited frequently. With KaKaoTalk, recruiters create attractive ads which elicit responses from potential victims eager for worthwhile employment. Employment ads on these platforms and other recruitment websites have demonstrated indicators of fraud such as inflated earning potential, extreme promises regarding immigration benefits, same day pay, no need for experience or training, housing and transportation costs provided, and vague and elusive conditions regarding the job itself. Alternatively, on WeChat, recruiters are able to utilize geographic location data to connect with users in their area, making this particularly convenient for fiendish recruiters in IMB networks.⁹

In labor trafficking through traveling sales crews, in-person recruitment is still most common, but traffickers also rely heavily on Facebook and Craigslist to expand their base of “independent contractors.”¹⁰ Although some crews have established a business page on Facebook, or communicate as a business via Facebook profiles intended for individuals, this practice seems to be on the wane.

Instead, today, it is perhaps more likely for crews to have individual members recruit new members directly from their personal friend or follower lists. In such cases, crew members typically post brazen photos or videos typically involving excessive displays of cash and exaggerated claims about job conditions. When curious potential victims inquire about what they see, the poster will generally follow up with a direct message with further details. There are also public and private “mag crew” (a colloquial term used by crews who primarily sell magazine subscriptions) Facebook groups, where people on various interconnected crews can gather to discuss travel plans, upcoming parties, and to push out recruitment information. Finally, although not a traditional social media platform, Craigslist is frequently referenced in reports to the National Hotline as a potential victim’s first introduction to a fraudulent job.



Ashley P:
July 17, 2017

Tired of working a minimum wage dead end job?? Want to get out and see the country while getting paid \$\$CASH\$\$ EVERYDAY and having fun?? We pay for lodging and food!! Hit me up for details. What are you waiting for?

Like Comment Share

6

Matt B Get that money!
4y · Like

Samantha G Would like to apply. DM'ing you now.
6y · Like

Josh D Looking to apply! Send me more info.
8y · Like

Nick N What a joke! They don't pay for food and lodging, they take it out of your pay!!
4y · Like

Ashley P @NickN get off my post! Stop the negative crap! Not the crew's fault you were weak and couldn't hang!
6y · Like

↑ Typical sales crew recruitment post by an individual user on Facebook. Based on actual public comment threads, but recreated with name changes to protect any potential victims involved.



Hiring alot of new people. Great oppourtunity to make great new friends and see all of the country. Why stay where it's cold, when you can be in California making great money with great people!!!! Call today. ☎️ 916-711-1661



↑ The above image was obtained from a public Facebook post of a potential door-to-door sales company.

In the case of trafficked migrant workers from the Philippines, who are among the top potential victims cited in domestic work, health care, and hotels and hospitality, job postings on Facebook are thought of as highly influential and trustworthy. In fact, according to one qualitative case study, some Filipino survivors have noted that migrant workers are more inclined to trust the validity of a job posting if it appeared on an online job forum or on Facebook, rather than the official ratings from the Philippines Overseas Employment Administration (POEA), a government regulatory agency for job recruiters.¹¹

In trafficking types that target migrant labor from Latin America, online recruitment has traditionally been less prevalent as the victims tend to come from rural and impoverished communities without easy access to technology. However, Polaris’s research into the agricultural industry suggests that may be changing. For example, a recent research project found several large agricultural labor recruitment agencies seeking workers from southern Mexico were utilizing Facebook to advertise recruitment events and then turning to WhatsApp to communicate logistical details about those events to potential workers. This suggests the potential shift in recruitment operations to online platforms and is an important trend for labor rights advocates to watch.

While these two examples highlight the influence that Facebook and WhatsApp may have on migrant job seekers, there is no doubt that more research is needed to understand how social media and online platforms are used or trusted in other regions or industries.

How Social Media may Be Used in Trafficking Operations



In 2017, nearly 8% of active federal online sex trafficking cases prosecuted in the United States involved advertisements for sex on Facebook.

Advertising and Sales via Social Media

As online sex marketplaces such as Backpage.com (see the accompanying box for more information) are facing increasing scrutiny and criminal and civil liability, traffickers have reacted by moving to less controversial – and less obvious – mainstream social media platforms and dating sites. Among those most commonly mentioned in reports to the National Hotline are Facebook, Instagram, Snapchat, Kik, Plenty of Fish, OKCupid, and Tinder. In fact, in 2017, nearly 8 percent of active federal online sex trafficking cases prosecuted in the United States involved advertisements for sex on Facebook.¹² Other mainstream dating sites used in escort services referenced on the National Hotline include Meetme.com, Grindr, Adult Friend Finder, and SeekingArrangement.com.¹³

The sale of sexual services via Facebook and Instagram and other social media is often less blatant than on a traditional advertising site. For example, within the escort services business model, thinly veiled captions are tacked under explicit photos or live-streams of both children and adults. Information about prices, location or contact information for traffickers is threaded into comments sections. Sometimes the advertisements are on the traffickers' personal accounts but often victims are forced to own the actual posting, using an account under their name. **In Polaris's survivor survey, 26 percent of participants stated their trafficker exploited them via their own personal social media accounts.**



Liability for Online Sex Trafficking and a Massive Shift in the Marketplace

In spring 2018, the Allow States and Victims to Fight Online Sex Trafficking Act became the law of the land. The legislation includes two major components. The first component creates a new civil right of action as well as state criminal and civil prosecutorial authority against online marketplaces that knowingly participate in sex trafficking. For example, a 2017 investigation by the U.S. Senate found that the online classified site Backpage.com had actively worked with traffickers to knowingly facilitate sex trafficking by editing their advertisements so that they would draw less law enforcement scrutiny when posted on the site – despite the fact that the original advertisements clearly suggested the person being advertised was a minor.¹⁴

In some of those cases, the families of those minors sued Backpage, only to be told in court that Section 230 of the Communications Decency Act protected the web company – and all web companies – from liability for anything on their sites that is created by others. The bill – which encompassed the provisions of the Senate companion bill, the Stop Enabling Sex Traffickers Act, or SESTA, narrowly amends the Communications Decency Act, the landmark law designed to encourage the growth and development of the internet. The change clarifies that sites can be sued civilly and prosecuted at the state level if they knowingly actively facilitate sex trafficking.

The second major component of the new law amends the Mann Act, a criminal statute related to prostitution and sex trafficking. This 21st century version of the Mann Act prohibits using the internet with the intent to promote or facilitate prostitution of another

person. Its enactment led many websites that include or revolve around advertisements for commercial sexual services to reconsider their business models. Sites that existed solely to advertise commercial sex began to voluntarily shut down en masse. Sites like Craigslist closed down sections that were used by some to advertise commercial sex.

Just a few days before the law was officially signed, federal law enforcement seized Backpage.com and announced the indictment of major Backpage executives. The website, which in 2013 was estimated to have controlled at least 80 percent of the entire online sex market,¹⁵ was immediately taken offline. Backpage hosted ads that resulted in at least 73 percent of all online child sex trafficking reports made to the National Center for Missing & Exploited Children (NCMEC)¹⁶ and 44 percent of all online sex trafficking cases reported to the National Human Trafficking Hotline. Its closure sent a powerful message to exploiters. It also created some very real fears among sex trafficking survivors about the safety of individuals still in the life who would have a harder time meeting sales quotas and therefore may face serious repercussions from violent traffickers.

The timing of the indictment created the impression that the new law made the charges against Backpage possible where they were not before. In reality, the charges were based on a lengthy investigation into allegations of criminal activity including money laundering and conspiracy to facilitate prostitution. At the time of this publication, the case is still pending.

While escort services are the most common business model for sex trafficking using social media, remote interactive sexual acts – more commonly known as webcam or “cam shows” – also market through these platforms. Once a buyer is engaged on a social network or dating site, the actual remote interactive sexual act will typically take place on a more sexually explicit live streaming site where buyers can purchase show credits.

Traffickers in various types of labor trafficking have also learned to use business pages on Facebook and review sites such as Yelp to facilitate their operations. Otherwise legal and legitimate venues such as bars and restaurants, nail salons, landscaping services, cleaning services, etc., can actively use a Facebook or Yelp business page to grow their customer base, but traffic their employees for their labor or services behind the scenes. This is also a common trend in sex and labor trafficking in bars, strip clubs, and cantinas, and more rarely with illicit massage businesses (IMBs). These Facebook pages are just some of many ways commercial front sex trafficking venues enhance the guise of their businesses’ legitimacy online and in their communities. The difference is, on these pages, sex buyers will actually add reviews regarding the sexual services they received at the location. It’s worth noting, however, that Polaris research has indicated buyer reviews on mainstream social media sites are generally less explicit than on websites like Yelp, or even the more sexually graphic reviews on sites such as Rubmaps.com. While most evidence of potential trafficking may not be discoverable in a business’ Facebook footprint, the platform is unfortunately still unknowingly aiding the trafficker’s illicit behavior and fueling the demand for exploited sex and labor.

Online Behavior of Traveling Sales Crews

While some videos and photos are not much different from any other group of boisterous friends, the online content from door-to-door sales crews aims to promote a cash-chasing lifestyle of relentless sales, partying, travel, and drug and alcohol use. Each crew varies in its social media use, but many use distinct slang terms, hand signals, and catch phrases. Some crews even use their own numbered hashtags unique to their “mag fam.”

These sales crews also leave another unique online digital footprint in the form of online customer complaints about products they purchased and never received. Sites like Better Business Bureau, Complaintsboard.com, Reddit, and RipOffReport.com could be valuable open sources of data when attempting to identify and target potential trafficking activities.

How Social Media may be Used as a Means of Control

As social circles have moved online, traffickers have kept pace. Isolating victims from their support networks has long been a go-to method for traffickers seeking to assert or strengthen their control. In Polaris's survivor survey, **34 percent of respondents who had accessed social media noted that their trafficker restricted their social media use in some way.** In some cases, this meant actively keeping victims away from their online networks. In others, the methods are more insidious.

One survivor of sex trafficking in a Polaris focus group explained how although her trafficker allowed her access to social media, it was just another tactic to maintain his all-encompassing control over her.

"Social media really was a piece of reinforcing all that grooming that was happening. Because I felt like I was connected with the outside world, but I was only allowed to follow other girls in the game, so it reinforced all of those social norms."

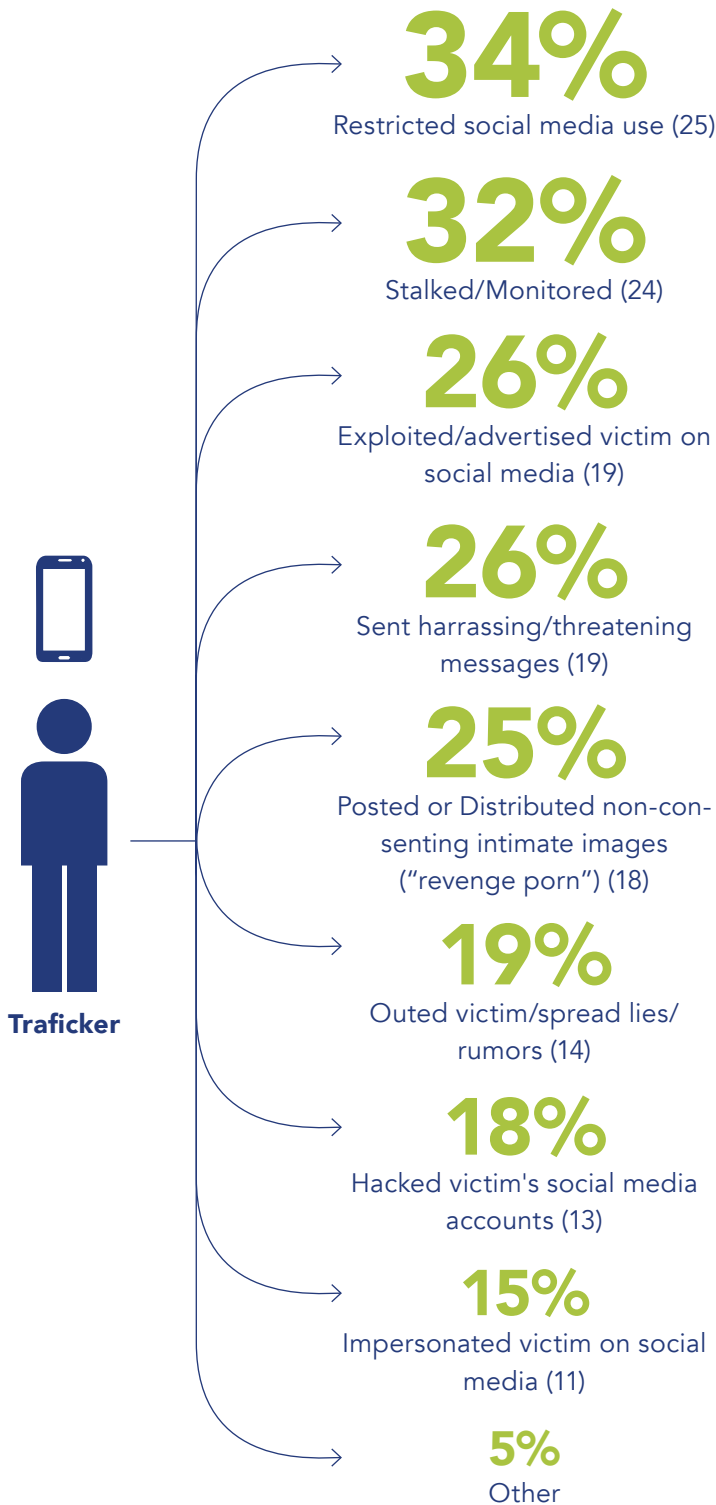
In another model of coercion, **32 percent of survivors in Polaris's survey indicated that their traffickers stalked or monitored their social media accounts,** most commonly checking up on victims' private messages. Other tactics reported include traffickers using social media to post or send threatening messages to victims, "outing" victims or spreading lies or rumors, even hacking accounts, or creating accounts to impersonate victims. Figure 2.0 breaks down responses of trafficker social media abuse from Polaris's survivor survey.

Interestingly, a recent survey of domestic minor sex trafficking victims by the non-profit group Thorn found that victims with traffickers who have entered the life more recently may experience less monitoring of their cell phones and internet use.¹⁷

Threats to distribute non-consensual intimate images, aka "revenge porn," is another method traffickers have reportedly used to control their victims in various types of sex trafficking. Additionally, the National Hotline has recorded numerous cases in which an intimate partner of a potential victim will financially benefit from the victim's sex act by selling the record of it to pornography sites.

Coercion and control do not necessarily end when the victim gets out of the situation. Cases learned about through the National Hotline, mostly in regards to sex trafficking, have highlighted incidences of potential traffickers using social media to stalk and abuse their victims long after they have left the trafficking situation. Potential traffickers will often use a survivor's friend lists, tagged photos, location "check-ins," and meta-data of GPS coordinates embedded in online photos, to check up on their activities and whereabouts.

Figure 2.0: Social Media Abuse
Polaris Survivor Survey (n=73)



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

(including doxxed victims, wrongfully reported accounts, shared sexual abuse online) (3)

The age range and demographics of traveling sales crew members mean that social media sites like Facebook and YouTube are extremely important in controlling victims in this type of trafficking business.

Crew leaders use these platforms as an extension of their extreme bullying and torment of their victims. For example, if a former crew member or survivor dares to leave the situation (or even worse – speak out online), other crew members and leaders will publicly shame, verbally abuse, and even sometimes go as far as threaten the victim via social media. Although there have been some reports on the Hotline of victims’ phones being confiscated by crew leaders, based on external research and the obvious digital footprint crew members leave online, Polaris believes that most victims have social media access during their trafficking situation. This puts investigators, service providers, and social media platforms in an advantageous position to directly reach victims and offer assistance when it counts the most.

How Social Media may be Used by Victims & Survivors

“When I was in the life, I had social media and I was allowed to use it, but it was highly monitored. But when I got out, I kept my accounts open and just started sharing about my process. Now as a service provider, my non-profit organization uses social media to connect with women still in the life. That has really been a unique and special thing for me.”

One need only type #MeToo into a search engine to witness the incredible cascade of possibilities born of survivors of sexual violence finding their voices and finding each other through social media. This very public reckoning makes clear that sexual harassment exists on the same spectrum of violence and gender inequity that culminates with the worst forms of exploitation and abuse - including sexual assault, sex trafficking, and labor trafficking. It also belies the sweeping generalization that social media is a net negative in the fight against sexual exploitation and human trafficking. Indeed survivor experiences paint a much more nuanced picture.

The clearest examples of how social media can be used against bad actors is the creation and use of photo detection tools, such as PhotoDNA by Microsoft. PhotoDNA attempts to identify victims by scanning photos uploaded to the platform and attempts to match them against a set of known child sex abuse images from illicit child pornography websites and online sex marketplaces. After identifying a match, the platform typically then reports the photo and user to organizations such as the National Center for Missing and Exploited Children (NCMEC).¹⁸

Beyond identifying victims, social media has a vital role in keeping survivors connected to loved ones and service providers during their trafficking situation.

Connecting with Support Systems

A victim may not have cell phone service to call or text a hotline, but they might be able to connect to wifi at their hotel or employer’s home to access social media for help. The National Hotline has received countless calls from family members who have had their trafficked loved one’s reach out to them via platforms including but not limited to Facebook Messenger, direct messages on Instagram, or through Kik.

Overall, **more than three quarters of survivors in Polaris’s survey stated they used internet platforms during their exploitation and 27 percent reported that they were on social media “very frequently.”**

Although the respondent pool involved survivors who may have been removed from their trafficking experience as new and emerging platforms gained popularity, **Facebook was still the number one reported social media platform used by 37 percent of victims.** Instagram ranked second most common with 22 percent, and 15 percent of survivors reported using Google Hangouts/GChat/Google Voice and dating sites/apps.

In the National Hotline data set from January 2015 through December 2017, 950 potential victims reported having access to mobile apps or social media during their trafficking situation. However, as always, since this information is not consistently revealed on Hotline communications, the numbers could be even greater.

Eventually, that connection through social media could become a lifeline. In Polaris’s survivor survey, **19 percent of survivors stated that social media played a role in their exit and 20 percent disclosed that they utilized private messages on social media apps to communicate with service providers.** One survey respondent explained her experience:

“A woman approached me one day in a hotel and gave me her contact information on a piece of paper. She told me that if I ever needed help that she would help me. At that time, I didn’t know that she was a service provider with a safe house for human trafficking victims, but several weeks later I called. Talking on the phone was not safe, instead we did a lot of private messaging over Skype and Facebook which felt safer for me (due to the fact that it was easier to hide than phone calls) and eventually months later those private message conversations lead to my first escape/exit.”

This method of communicating with possible outside assistance beyond the National Hotline is particularly common among service providers who specialize in assisting victims of illicit massage businesses through WeChat and KaKao Talk.¹⁹



↑ Example private social media message thread of a potential victim reaching out to family for help. Based on real conversations expressed to the National Hotline, but recreated with name changes to protect any potential victims involved.

“I messaged my mom on Facebook and told her I couldn’t leave.”

Getting and Staying Safe

Social media and particular technologies within those platforms also play a critical role in survivors' safety plans, during their trafficking situation, in their plans to escape or exit the situation, and in efforts to lead a normal life, free of abuse, post-trafficking.

Survivors may use the disappearing messages feature, for example in Snapchat, Instagram, or Facebook Mobile, in order to communicate discreetly with their support system without the fear of their trafficker discovering the message history in their logs. Potential victims from the National Hotline have also sent disappearing pictures or videos of abuse via Snapchat to loved ones, in a creative and fast way to signal for help. This may well be an area social media platforms could expand upon.

The National Hotline has also heard of potential victims who may not know their current location due to their frequent travel and isolation, but have used a social network's location discovery services to figure out what city they are in or publicly "check in" to signal their whereabouts to loved ones. Survivors who have exited their situation are some of the most savvy when it comes to using social media features to keep them safe. Using features such as blocking, audience selectors, friends/follower sub-groups, tagged photo requests, disabling location services, and removing their profile from general search results are integral pieces of a survivor's ongoing safety plan. However, it's important for social media platforms to make these and other privacy features available, intuitive, and easy to navigate, since a victim may have very little time to plan for their safety. The accessibility and ease of safety and privacy features were a recurring theme in Polaris focus groups.



INDUSTRY SPOTLIGHT: Safety Net Project, National Network to End Domestic Violence

The National Network to End Domestic Violence (NNEDV)'s Safety Net project provides expertise and technical assistance at the intersection of technology and abuse. Specific products include trainings, resources, and tools to help survivors of violence, victim service providers, and leading tech companies address how technology impacts survivors and how to create online spaces in which survivors can participate without fear of abuse and harassment.

Representatives from Safety Net currently sit on Facebook's Safety Advisory Board and on Twitter's Safety Council. These committees are specifically designed to gather input and consultation on the websites' policies, protocols, user features, and initiatives around safety. NNEDV is just one of many esteemed organizations on the committees, which aim to ensure the unique needs of survivors are considered in programmatic decisions and new product roll-outs. Two of their many important contributions have been publications created in collaboration with Facebook and Twitter that provide guidance for survivors on the available privacy settings and resources and how survivors can utilize them to stay safe.

Another high-quality resource from the Safety Net Project is the Tech Safety App which compiles tech safety information, safety and privacy tips, and specific resources to report abuse or seek help.

Additional NNEDV Social Media Resources for Survivors and Service Providers:

- [Privacy & Safety on Facebook: A Guide for Survivors of Abuse](#)
- [Safety & Privacy on Twitter: A Guide for Survivors of Harassment & Abuse](#)
- [Tech Safety App](#)
- [NNEDV Resource Highlight: Safety on Social Media \[Blog post\]](#)
- [WomensLaw.org: Abuse Using Technology](#)
- [WomensLaw.org: Safety While Using Social Media](#)

For additional tools and resources created by Safety Net, or to contact them for more information, please visit www.techsafety.org



ONLY



CHI CHI BITES

waystrueco

Healing, speaking out, and helping others

Survivors of labor trafficking have also used internet platforms as a powerful tool to elevate their experiences. For example, despite traffickers on traveling sales crews using social media to try to discredit and publicly humiliate their victims, survivors have taken to sites like Facebook, YouTube, Complaintsboard.com, Reddit, and RipOffReport.com to challenge the public portrayal of adventure, fast money, and glamour.

This includes one anonymous individual who in 2012 used the open complaint forum, RipOffReport.com, to detail their experience working for a potentially abusive traveling sales company. The former employee

took to the website to allege that they were paid \$20 per day for the first three days working 12-15 hours. However, after that, the former employee claimed that they only got paid if sales were made, and that when employees didn't make the expected sales, they were allegedly either abandoned or were physically assaulted by multiple senior members of the crew. The former employee also told of how the 18-year-old young women who would join the crew would often be coerced into having sex with the managers. The former employee even closed the post by thanking the company for making them that much stronger to find the voice needed to rise up and speak out against the abusive practices of magazine crews.²⁰



↑ Screen capture of Contratados.org home page.

Along similar lines, Centro de los Derechos del Migrante (CDM) has created Contratados.org, a powerful online platform that allows migrant workers to post Yelp-like reviews of employers and recruiters, detailing their own experiences. Before committing to

or spending money on recruitment or travel for H-2 and J-1 guestworker programs, which are commonly riddled with fraud, abuse, exploitation, and trafficking, potential workers can log onto Contratados.org and research their recruiter and the job they are interested in accepting to verify their legitimacy.

Summary of reviews



Recruitment conditions

They charged me for the job offer:

YES (2) NO (5)

They charged me money but didn't get me the job:

YES (0) NO (4)

They gave me a loan:

YES (0) NO (5)

*Did they charge interest?**With high interest (0)**With low interest (0)**Without interest (0)***They gave me a work contract:**

YES (5) NO (0)

The work was what I was promised:

YES (5) NO (0)



Recruitment practices

They treated me the same as everyone else:

YES (6) NO (0)

*I think it was because of my:**Race (0)**Nationality (0)**Language (0)**Sex (0)**Age (0)**Sexual Orientation (0)**Other (0)***They punished me for making a complaint or for defending my rights:**

YES (0) NO (5)

*The punishment was:**They didn't hire me again (0)**Now they don't hire my relatives (0)**They retained my personal documents (0)**They threatened me (0)**Other (0)***They retained my personal documents:**

YES (2) NO (5)

They threatened me:

YES (0) NO (5)

They physically assaulted me:

YES (0) NO (5)

They verbally assaulted me:

YES (2) NO (5)

They sexually assaulted me:

YES (0) NO (5)

They kept me somewhere against my will:

YES (0) NO (5)

↑ A sample of a Contratados review where a migrant worker can detail potential recruitment fees, lending practices, the accuracy of the job description, and potential discrimination, retaliation, fraud, and abuse.

The platform also supplies users with interactive tools that equip migrant workers with valuable information about their rights, and even industry- or region-specific resources. CDM created the platform in collaboration with migrant workers themselves, taking into account varying levels of literacy, tech savviness, and existing knowledge-sharing practices in migrant communities. Contratados helps workers have more control in the labor recruitment process, which for so long has placed the power in the hands of unscrupulous recruiters and employers.

Much like the #MeToo movement, these platforms are providing alternative pathways to justice, and creating an online footprint to chronicle the abuse and fraud of traffickers.

Social Media: Recommendations and Opportunities

Websites and social media networks have made laudable efforts and contributions toward combating human trafficking, including, most notably, the creation and distribution of tools to detect child pornography. But there is room to do more. Many of the tools, policies, and procedures originally created to combat child pornography specifically could, with minor adaptations, be adapted to keep human trafficking from thriving on social media platforms. Outlined here, are some recommendations on how to tackle human trafficking from a similar, yet tailored lens.

“I think nowadays the younger generation is not apt to having phone conversations or even in-person conversations. They don’t know how to articulate “I need help,” but they could text or put it in writing... So, I think to reach the populations that are most vulnerable right now, [a social media platform for support] is needed.”

1. Call out Human Trafficking in your Terms of Service

[adapted from Thorn]

Explicitly state in the Terms of Service that any use of the platform to facilitate exploitation, human trafficking (including types of labor trafficking), non-consensual intimate images (NCII), or child pornography is strictly prohibited and enforced to the highest extent.²¹ To ensure the prohibitions are clear, platforms would define the terms and provide examples of what might constitute a violation. Social media platforms are also encouraged to review existing policies on related crimes such as cyber bullying and harassment. These existing policies can often be slightly modified to more intentionally include the cyber abuse occurring in the context of human trafficking, domestic violence, and stalking. Having a written policy is important not only as a contractual obligation to users, but can help establish that the platform is in compliance with the applicable laws. It also acts to inform users of the platform's ethical commitment to ending violence. This builds trust with users which ultimately encourages them to continue their patronage. However, simply writing a blanket policy does nothing unless the policy is backed up with consistent, data-driven response and enforcement protocols like the additional recommendations provided here. Enforcement for violations may include but may not be limited to, removal from the platform as well as law enforcement involvement.

2. Identify High-Risk Users and Business Pages

[adapted from Thorn]

Conduct proactive identity and risk checks against national sex offender registries, banned labor recruiters, media articles, human trafficking convictions, online buyer boards, and business complaint sites.

Platforms are also urged to implement basic identity checks to verify ages, email addresses, and phone numbers. Thorn also suggests creating algorithms “to flag users over a certain age who befriend or follow numerous underage individuals, or send messages to many strangers. Even if the user’s age is not known, individuals whose friend requests are rejected at a high rate can be flagged for review.”²²

3. Invest in PhotoDNA or other Photo Hash Systems [adapted from Thorn]

Conduct pre-screens on all photos at the time of upload (especially for any high-risk users) to prevent the photo from being posted on your platform, as well as screen photos at rest.²³ Run the screens not only against a known database of child exploitation images, but against data sources unique to commercial sex and trafficking such as sex ads, buyer boards, and missing persons. Get creative and explore if a similar hash system or photo-match technology could be used to identify the distribution of NCII, or other previously banned images.

4. Implement Innovative Safety Features for Survivors

Offer features and tools that survivors (and users at large) can access to manage their ongoing safety and privacy needs. Features like disappearing messages, passcode protected folders or photo albums, the ability to customize privacy settings for individual posts, and easy to follow and accessible safety and privacy guides are just some tangible ideas that can equip survivors with the power to remain safe on your platform. Consider defaulting to “opt-in” features instead of requiring users to “opt-out” when rolling out new features that could be used to stalk or harm survivors (such as geo-location services). If your platform doesn’t already have a safety advisory committee, consider implementing one and inviting anti-trafficking organizations and survivors to the conversation.

“My trafficker did not use to monitor my phone unless I was acting kind of funny. Then he’d be like, “give me your phone.” I wouldn’t have a chance to delete anything. At least with [disappearing messages], I know there’s nothing there.”

5. Use High-tech Solutions to Offer Assistance to Survivors

Social networks are in a unique position to leverage their unsurpassed expertise in technological solutions, and push their counter-trafficking scope beyond identification, to create more creative and inclusive methods for supporting and empowering survivors that use their platforms. For example, Facebook has already implemented such creative tech solutions in suicide prevention, where artificial intelligence software can detect language of possible self-harm and suicidal ideation in a user’s posts and offer the National Suicide Prevention Lifeline for assistance.²⁴ Although there are serious privacy considerations that must be explored further, and opt-in user agreements in place, similar algorithms could potentially be used to detect common words, phrases, and behavior patterns used by individuals at-risk for human trafficking and push out messaging for the National Hotline, or a country’s equivalent. Consulting with survivor leaders will result in the strongest criteria and response protocols.

6. Use of Targeted Ads for Anti-Trafficking Organizations

When permitted by user agreements, social networks are already accessing users' search histories, "likes", and other online behaviors to offer tailored ads and suggested content to enhance their experience on the platform. This same technology can be used to intelligently offer sponsored ads or posts from local anti-trafficking organizations or the National Hotline/Polaris. All survivors in Polaris focus groups were vastly supportive of this idea. Most focus group participants even supported an option to explore technology needed to facilitate secure and confidential communications directly with the National Hotline through Facebook or Instagram, or linking an ad directly to the National Hotline's online chat website. Survivors offered further suggestions on how such sponsored or suggested content could effectively reach trafficked individuals on the platform including suggested messaging, images, safety precautions, and criteria used. These innovative ideas further emphasize the fundamental need for survivor inclusion when developing such content.

7. Create Easy and Accessible Reporting Options

Streamlined reporting options, like those already in place for users to flag hate speech or child exploitation, should be put in place for users to report potential trafficking on the platform. Whether it's reporting a potential sex trafficker recruiting girls, a business with a suspicious and potentially dangerous job offer, or a victim posting clues that they are suffering, the reporting option should be easily available to users on all kinds of posts, messages, and pages/profiles. All reports can be triaged by platform professionals who ideally would have strong training and protocols in place and developed with survivor leaders, to guide appropriate responses either to NCMEC, the National Hotline, or simply offering a potential victim support services like mentioned above.

8. Consult and Collaborate with Survivors and NGO Professionals

As mentioned throughout all of these recommendations, it is essential to team up with survivors and other experts in the fields of human trafficking, the sex industry, child pornography, NCII, domestic violence, and stalking to create consulting partnerships or advisory boards. Such partnerships can help develop and improve internal policies, create seamless reporting relationships, create smarter safety and privacy tools for survivors, and ensure traffickers and abusers are less able to misuse the benefits of social media products.

If you work with a social networking site and want to learn more about partnering with Polaris, please contact corporateengagement@polarisproject.org



Financial Services Industry

Financial Services Industry



The following matrix is meant to be an overview of some of the intersections that diverse financial services may have with potential victims and traffickers of various types of trafficking (See [Typology of Modern Slavery: A Summary](#) section of this report). Each dot can represent one or more touch points throughout a trafficking life cycle including during recruitment, by potential traffickers to store, conceal, manage, send, or launder funds, or by potential victims and survivors during and after their trafficking experiences. All intersections were informed by Polaris’s operation of the National Human Trafficking Hotline since 2007, Polaris survivor survey, Polaris focus groups, or additional, but not exhaustive, external research and analysis which may include service provider and stakeholder knowledge sharing, scholarly research, media articles, documented civil and/or criminal cases of human trafficking, or quantitative and qualitative analysis of external data sets and/or public records. This matrix is by no means comprehensive, as potential traffickers and victims have the potential to access many financial services. The absence of a dot may mean there is insufficient data or research on the intersection. Polaris omitted the types of trafficking where research and data were lacking.

		Types of Financial Services					
		Retail Banking (Personal Banking)	Commercial Banking (Business Banking)	Credit/Debit Cards (including pre-paid)	Money Service Businesses (including Money Transfer Services)	Retail Check Cashing	Formal Paychecks/Payroll
Types of Trafficking	Agriculture & Animal Husbandry	●	●	●	●	●	●
	Arts, Sports, & Entertainment	●	●	●			
	Bars, Strip Clubs, & Cantinas	●	●	●	●		●
	Carnivals	●	●		●	●	●
	Commercial Cleaning		●		●	●	●
	Construction		●		●	●	●
	Domestic Work	●			●		●
	Escort Services	●		●	●		
	Factories & Manufacturing		●		●	●	●
	Forestry & Logging		●		●	●	●
	Health & Beauty Services		●		●		●
	Health Care		●		●	●	●
	Hospitality		●		●	●	●
	Illicit Activities	●			●		
	Illicit Massage Businesses	●	●	●	●		
	Landscaping		●		●	●	●
	Outdoor Solicitation			●			
	Pornography	●	●	●			
	Recreational Facilities		●		●	●	●
	Remote Interactive Sexual Acts	●		●			
Residential Sex Trafficking	●			●			
Restaurants & Food Service		●		●	●	●	

The International Labour Organization estimates that human trafficking is a \$150 billion global industry. While there are certainly some completely un-banked traffickers, a significant portion of that overwhelming sum passes through legitimate financial services businesses. This happens through thousands of diffuse, small transactions. These intersection points offer ample - albeit not obvious or easy - opportunity for financial institutions to detect and disrupt human trafficking. In many cases, they are in fact legally required to do so. Federal laws, including the Bank Secrecy Act (BSA) and the USA PATRIOT Act, mandate that financial institutions monitor for and report suspected illegal activity. The handling of funds generated by human trafficking can constitute money laundering.

This legal obligation – unique to the finance industry – has led to the creation of robust systems to detect suspicious activities associated with human trafficking, money laundering, and related financial crime.

These systems have in turn led to actionable information for law enforcement to launch investigations and identify potential perpetrators. Because financial crimes are not as reliant on victim testimony as other offenses, pursuing traffickers from a money laundering angle can be an effective method to obtain justice in situations in which the victims are too scared or traumatized to cooperate. Thanks to the leadership and commitment of many in the financial services industry, traffickers' motivating force – greed – has been turned into a powerful weapon against them.

Scaling and expanding upon the anti-money laundering (AML) work already underway is critical to disrupting human trafficking and holding traffickers accountable. But it is not the only role this industry has to play. The scope and ubiquity of the financial sector creates a range of opportunities - from leveraging lending and investment decisions to assisting survivors in the recovery process by providing them access to financial services.

How the Financial Services Industry may be Used in Recruitment

The Use of Financial Institutions in the Recruitment Process: Labor Trafficking

Before they so much as step on an airplane, many foreign victims of labor trafficking on temporary work visas have already had their dreams turned against them in the form of crippling recruitment fees paid out to unscrupulous labor brokers. Such fees are illegal, but the practice is common and devastating. Participants in the Polaris focus group discussed being charged for attending informational sessions about the job, transportation to the embassy interview, fraudulent “visa processing fees,” “visa extension fees,” “contract fees,” airfare to the United States, and housing deposits. In Polaris’s survivor survey, out of the 17 individuals that reported entering their trafficking situation with a temporary work visa, all but two

(83 percent) reported paying prohibited recruitment fees. In a much more expansive study by Centro de los Derechos del Migrante (CDM), 53 percent of workers surveyed reported paying recruitment fees averaging \$590 before travel expenses.²⁵ In 2017, The National Domestic Workers Alliance reported that victims of labor trafficking in domestic work can pay between \$3,000 - \$9,000 in recruitment fees.²⁶ The result of these fees is that many workers arrive for their first day of work already deeply indebted to their employer or recruiter. This debt is a coercive tactic used to trap the worker until the debt can be repaid. Industries like agriculture, landscaping, and hospitality employ large numbers of workers on temporary visas commonly associated with predatory recruitment practices. This makes these high risk industries for debt bondage and other forms of forced labor.

Temporary Work Visas

One of the government-based systems that has the potential to be the most disruptive to traffickers if reformed is our patchwork of temporary guest worker visa programs. Research shows there are now more than a million people living and working in this country under a variety of such programs. From picking our fruit to caring for our children, these men and women are a vital piece of our nation’s economy. Yet the program that invites them in has a number of structural weaknesses that also puts them in grave danger of being exploited and trafficked.

Between January 2015 and December 2017, the National Human Trafficking Hotline received reports of 814 potential victims of human trafficking and 1,881 potential victims of labor exploitation that had a temporary work visa at the time of their exploitation.

The most significant structural problems with temporary work visas is that virtually all of them are tied to a specific employer. This creates a power imbalance far beyond the normal confines of the employer/worker

relationship; from the moment employment terminates, the migrant worker is immediately out of legal status and eligible for deportation. For many migrant workers, this is a fate that could destroy everything they have dreamed of. Workers leave their homes and loved ones to take these jobs in search of economic opportunity. Many have gambled that the decent salaries that they have been promised in America are worth going into debt to reach. By the time they get to the jobs, many owe thousands of dollars in debt to unscrupulous recruiters who have charged them – illegally – for every step along the way. Leaving a job, no matter how exploitative, would shut off all avenues to pay off those debts. Worse yet, if their employer reports them as out of status and has them deported, they will be cut off from ever returning legally to try again, with a better, fairer job. Traffickers know all of this, of course. They are keenly aware of exactly how to threaten workers, game the system, and extract payments from people who have little or nothing to give.

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There are numerous legislative and regulatory steps that the U.S. Congress could take to make temporary guest worker programs safer for migrant workers. Key among these is decoupling these visas from specific employers or in the case of a few visas types where there is some movement possible, making that process more streamlined and practical. The government should also put real effort behind enforcing regulations that bar recruiters from charging potential workers for everything from the right to show up at a job fair to the actual visa itself. Additionally, adding a layer of transparency to the existing system would go a long way toward protecting workers. The current system makes it extremely difficult for workers to learn about employers and recruiters – even such information as whether they have been fined or sanctioned in the past. Overall data collection and cross-agency cooperation is also severely lacking.

The following matrix is meant to be an overview of which temporary work visas are used by traffickers and recruiters in various types of trafficking and labor exploitation. (See [Typology of Modern Slavery: A Summary](#) section of this report). All intersections were informed by Polaris’s operation of the National Human Trafficking Hotline since 2007, Polaris survivor survey, Polaris focus groups, or additional, but not exhaustive, research and analysis which may include service provider and stakeholder knowledge sharing, evidence based on media articles, documented civil and/or criminal cases of human trafficking, or quantitative and qualitative analysis of external data sets and/or public records. The absence of a dot may mean there is insufficient data or research on the intersection. Polaris omitted the types of trafficking where research and data were lacking or types of trafficking which do not typically rely on temporary work visas.

		Types of Temporary Work Visas						
		A-3/G-5	H-2A	H-2B	B-1	J-1	F-1	H-1B
Types of Trafficking	Agriculture & Animal Husbandry		●					
	Arts, Sports, & Entertainment						●	
	Carnivals			●				
	Commercial Cleaning			●		●		
	Construction			●				
	Domestic Work	●			●	●		
	Factories & Manufacturing			●				
	Forestry & Logging			●				
	Health Care			●	●	●		●
	Hospitality			●		●		
	Illicit Massage Businesses				●		●	
	Landscaping			●				
	Recreational Facilities			●		●		
	Restaurants & Food Service			●		●		
Types Yet to be Defined: (e.g. Education, Professional/Tech)							●	

For more information on how temporary visas are used in recruitment, the trafficking operations using them, and the victims who are impacted, please read Polaris’s report, [Human Trafficking on Temporary Work Visas: A Data Analysis 2015 - 2017](#).

All Polaris focus group participants who reported paying recruitment fees, stated they did so via in-branch deposits directly into their recruiter's bank account while still in their country of origin. Some of these survivors did so in numerous transactional installments, as their recruiter invented more and more fees throughout the recruitment process.

One focus group survivor who made at least four separate deposits totaling over \$5,000 into her recruiter's account in the Philippines, pleaded, *"I wish [someone] would have asked what all that money was for."* Alternatively, some National Hotline callers have disclosed that they were instructed to use money remittance services, or other types of wire transfers to transfer money to their recruitment agencies, either based in their home countries or in the United States. Although these examples are anecdotal, this highlights the importance of training on victim identification for customer-facing bank staff in source countries. Fortunately, many financial institutions have recognized this and have increased trainings for customer-facing staff in recent years.

Some workers may never have such direct contact with a financial institution, but transactional monitoring on the recruiter or recruitment agency accounts may unearth crucial indicators of suspicious recruitment activity linked to debt bondage or other coercive practices. When the recruitment debt is owed to the employer, employers frequently deduct the money from the victims' wages or do not pay victims until they have worked off the debt - coercing victims to continue to work at jobs they would have otherwise quit.

An example of this can be seen in the historic series of civil cases against Signal International, LLC, "which together comprise one of the largest labor trafficking cases in U.S. history."²⁷ In this case, court documents stated that victims were instructed to make out personal checks to the owners of their recruitment agency in three installments.²⁸

In order to comply with their recruiter's financial demands, many workers routinely take out loans, either informally from well-intentioned family and friends, exploitative loan sharks, or through formal lending institutions.²⁹ According to Centro de los Derechos del Migrante (CDM), 47 percent of workers surveyed reported having to take out a loan to cover the cost of recruitment. The interest rates on these loans ranged anywhere from 5 percent to a staggering 79 percent.³⁰

The financial burdens of recruitment fees can be devastating in and of themselves but they are also - ironically - a necessary backdrop for trafficking to occur. A worker who chooses to come to America for a well-paid temporary job is going to be that much more reluctant to speak out about exploitation if that worker fears having no other way to pay back massive debts incurred to get the job in the first place.

Many of the workers in CDM's study and in a Polaris focus group discussed how they were required to either sell family land or post the land as collateral to obtain the necessary loan. One Polaris focus group survivor explained the motivation and the devastating costs:

"When you are promised a good life, you are ready to pay the price ahead of time. There are people from where I come from who have sold their only piece of land just to buy a ticket to come here thinking that they will make money and better their lives. If they have been duped, how and where do they go back to? They need protection."

Another survivor described how she turned to multiple sources to cover this debt and the ripple effect it had on her family members. To compound this impossible circumstance, the job she was told she was hired for didn't exist, and she was forced to take a lower-paying job. She explains:

"It was a huge debt [to my recruiter], [and] from my mother in law, and from a lending institution. Just to be here... My parents sold land just to finance my visa. And when we came here, we ended up in a daycare for only \$10 per hour. How can we pay our debts then?"

The Use of Financial Institutions in the Recruitment Process: Sex Trafficking

Recruitment fees paid through legitimate financial systems are also common within some types of sex trafficking, most notably within illicit massage businesses. Similar to recruiter fees paid for temporary work visas, many victims of this type of trafficking take out large loans to hire visa brokers to handle the expensive, and often fraudulent, visa handling process.³¹ Once in the United States, they are shuttled to various brothels operating under the guise of a legitimate massage business, and coerced into providing massage services with accompanying commercial sex acts in an effort to pay down their ever-increasing debt.

The use of financial institutions in the recruitment stage may be less prevalent in other types of sex trafficking. However, at least one sex trafficker discussed in a Polaris focus group planned ahead by factoring in potential recruits' credit history, as the survivor explained:

"...he would focus strictly on girls that were 17 about to turn 18 just because their credit would be fresh. He could have them get credit cards. Versus someone who's already been in the life, even if they're only in their early 20's... [their credit] would be jacked up already. So he started focusing on girls not only for the profit margin because of their age, but because he could work with their credit. That would be a recruitment question before they come: "How's your credit?" Because he started realizing credit was important for things like getting a house or things like that in the future. He knew he couldn't do that with just cash."



How the Financial Services Industry may be Used in Trafficking Operations

Financial institutions have done significant research and analysis to understand trafficking operations and design systems that can detect potential financial indicators of trafficking. In 2014, the Financial Crimes Enforcement Network (FinCEN) issued an advisory that included a [list of potential indicators of trafficking](#) based on this work.³² Following the release of this advisory, suspicious activity reports (SAR's) related to human trafficking increased by 900 percent.³³ Many major financial institutions have committed significant energy to refining and expanding on these indicators in an attempt to ensure such reports are useful in investigations, particularly those related to sex trafficking. Given the huge variety of how trafficking situations occur and how traffickers adapt their operations over time, developing systems tailored to reflect the nuances of each type of trafficking is extremely challenging. The financial services industry should be applauded for its innovative efforts to meet this challenge.

Suspicious Activity Report		1	
July 2003 Previous editions will not be accepted after December 31, 2003		FRB: FR 2230 FDIC: 671006 OCC: 8010-9-8010-1 OTS: 1601 NCUA: 2362 TREASURY: TD F 90-22-47	OMB No. 7100-0212 OMB No. 3064-0077 OMB No. 1557-0180 OMB No. 1550-0003 OMB No. 3133-0094 OMB No. 1506-0001
ALWAYS COMPLETE ENTIRE REPORT (see instructions)			
1 Check box below only if correcting a prior report. <input type="checkbox"/> Corrects Prior Report (see instruction #3 under "How to Make a Report")			
Part I Reporting Financial Institution Information			
2 Name of Financial Institution		3 EIN	
4 Address of Financial Institution			
5 City		7 State	8 Zip Code
9 Address of Branch Office(s) where activity occurred <input type="checkbox"/> Multiple Branches (include information in narrative, Part V)			
10 City		11 State	12 Zip Code
13 If institution closed, date closed			
14 Account number(s) affected, if any		Closed?	
a _____		<input type="checkbox"/> Yes <input type="checkbox"/> No	
b _____		<input type="checkbox"/> Yes <input type="checkbox"/> No	
c _____		Closed?	
d _____		<input type="checkbox"/> Yes <input type="checkbox"/> No	
e _____		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Part II Suspect Information <input type="checkbox"/> Suspect Information Unavailable			
15 Last Name or Name of Entity		16 First Name	17 Middle
18 Address			
19 City		21 State	22 Zip Code
23 Country			
24 Phone Number - Residence (include area code)		25 Phone Number - Work (include area code)	
26 Occupation/Type of Business		27 Date of Birth	28 Admission/Confession?
a _____		MM / DD / YYYY	a <input type="checkbox"/> Yes b <input type="checkbox"/> No
29 Forms of Identification for Suspect			
a <input type="checkbox"/> Driver's License/State ID		b <input type="checkbox"/> Passport	c <input type="checkbox"/> Alien Registration
d <input type="checkbox"/> Other _____		Issuing Authority _____	
Part III Suspicious Activity Information			
33 Date or date range of suspicious activity		34 Total dollar amount involved in known or suspicious activity	
From MM / DD / YYYY To MM / DD / YYYY		\$ _____ .00	
35 Summary characterization of suspicious activity:			
<input type="checkbox"/> Bank Secrecy Act/Structuring/ Money Laundering <input type="checkbox"/> Bribery/Gratuity <input type="checkbox"/> Check Fraud <input type="checkbox"/> Check Kiting <input type="checkbox"/> Commercial Loan Fraud <input type="checkbox"/> Other _____ (type of activity)		<input type="checkbox"/> Computer Intrusion <input type="checkbox"/> Consumer Loan Fraud <input type="checkbox"/> Counterfeit Check <input type="checkbox"/> Counterfeit Credit/Debit Card <input type="checkbox"/> Counterfeit Instrument (other) <input type="checkbox"/> Credit Card Fraud <input type="checkbox"/> Debit Card Fraud <input type="checkbox"/> Defalcation/Embezzlement <input type="checkbox"/> False Statement <input type="checkbox"/> Misuse of Position or Self Dealing <input type="checkbox"/> Mortgage Loan Fraud <input type="checkbox"/> Mysterious Disappearance <input type="checkbox"/> Wire Transfer Fraud <input type="checkbox"/> Terrorist Financing <input type="checkbox"/> Identity Theft	
36 Amount of loss prior to recovery (if applicable)		37 Dollar amount of recovery (if applicable)	
\$ _____ .00		\$ _____ .00	
38 Has the suspicious activity had a material impact on, or otherwise affected, the financial soundness of the institution?			
a <input type="checkbox"/> Yes b <input type="checkbox"/> No			
39 Has the institution's bonding company been notified?			
a <input type="checkbox"/> Yes b <input type="checkbox"/> No			
40 Has any law enforcement agency already been advised by telephone, written communication, or otherwise?			
a <input type="checkbox"/> DEA		d <input type="checkbox"/> Postal Inspection	g <input type="checkbox"/> Other Federal
b <input type="checkbox"/> FBI		e <input type="checkbox"/> Secret Service	h <input type="checkbox"/> State
c <input type="checkbox"/> IRS		f <input type="checkbox"/> U.S. Customs	i <input type="checkbox"/> Local
j _____ Agency Name (for g, h or i)			
41 Name of person(s) contacted at Law Enforcement Agency		42 Phone Number (include area code)	
_____		()	
43 Name of person(s) contacted at Law Enforcement Agency		44 Phone Number (include area code)	
_____		()	
Part IV Contact for Assistance			
45 Last Name		46 First Name	
_____		_____	
47 Middle		_____	
48 Title/Occupation		49 Phone Number (include area code)	
_____		()	
50 Date Prepared			
MM / DD / YYYY			
51 Agency (if not filed by financial institution)			

Suspicious Activity Report (SAR) form. →

Financial Red Flags: Findings from Survey & Focus Groups

In the Polaris survivor survey, 99 survivors screened into the section that included questions about their own or their traffickers' use of financial systems. For one question, Polaris took the 2014 list of FinCEN indicators for human trafficking activity and reworded them to make them more identifiable to a survivor or non-AML professional. Survivor participants were asked to select the indicators that they believe were present in their trafficking situation. While the following results are based on a limited sample size and lean disproportionately toward sex trafficking survivors, they provide evidence to support the prevalence of these indicators and how they play out in real situations. Polaris supports the replication of this research to include more diversity in the type of trafficking (including labor), and inclusion of survivors who left their trafficking situations more recently.

Figure 3.0: Financial Indicators That Occurred During Exploitation
Polaris Survivor Survey (n=99)

Financial indicators that occurred during exploitation (n=99)	# of Respondents	Percentage
Trafficker used methods to conceal income/source of income	56	57%
Trafficker's lifestyle inconsistent with stated income	45	45%
Victim escorted to banks	28	28%
Trafficker used victim's account	26	26%
Victim transferred money back to trafficker	20	20%
Extremely low or \$0 paychecks	17	17%
Structured deposits to avoid detection	17	17%
Victim worked for registered business but was paid in cash	14	14%
Employer/trafficker was listed on victim's bank accounts	14	14%
Bank account opened for victim, received no deposits	7	7%
Strange deductions on paystubs	4	4%
Victim paid visa recruitment fees	4	4%
Victim transferred money to a labor recruiter	1	1%

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

In a free-form text box in Polaris's survey, as well as in follow-up conversations in Polaris focus groups, survivors provided rich testimony that included examples of how their traffickers moved and stashed money while avoiding detection from financial professionals.

The details provided suggest trafficking survivors are invaluable resources for AML professionals looking to improve their understanding of how trafficking businesses work.

"We had to send quotas through [a money transfer service] and [pre-paid credit cards] using passwords/secret questions and staying under \$1,000 so he didn't have to show his ID to pick up."

"...any bank accounts were used to filter money but never store it. Also rent for storefronts, utilities, etc. was monitored and recorded via bank accounts... Advertisement online was paid through these accounts as well, making sure his name was never associated with the advertisements. The account was always in my name. Or one of my wife-in-laws."

"[He would] deposit a \$1,000 or deposit \$2,000 and then withdraw it and you'll have the cash. But it would show on the statement that this amount was going in, so you could go and get the car and show that I had an income."

"He was never linked [to] or involved with [the bank accounts]. He would just sit at the bank with me... [and] make sure that I was not telling anyone anything, but he would be present."

"We had to [manage money] several different ways because we had so much money. We would deposit into different banks and into different accounts. We might deposit some of the escort fees into one account, or split it if it went over \$9,999 and put it into another one. We would send [a money transfer] with part of it."

Financial Patterns of Illicit Massage Businesses

Masquerading as legitimate massage businesses, illicit massage businesses extensively use legitimate financial institutions to process payments, pay business expenses, control their victims, launder and move money, and obfuscate who is profiting from the operations. For the convenience of commercial sex purchasers paying in cash, many illicit massage businesses have private automated teller machines on site. Many also accept credit card payments. Financial institutions that have monitored patterns in credit card transactions have noted significant differences between typical transaction patterns at legitimate massage businesses and transaction patterns at illicit massage businesses.

名字	金额	时间	房	总时	备注
Katie	400	11:30	3		
Katie	400	12:30	3		
Katie	400	1:30	3		
Katie	400	2:30	3		
Vivian	350	3:30	3	65	
Vivian	400	4:30	3		
Vivian	400	5:30	3		
Nina	400	6:30	3		
Nina	400	7:30	3		
Nina	400	8:30	3		

↑ Photo of an actual ledger taken from a potential illicit massage business, detailing potential victims, appointments, and earnings.

Through an extensive mapping of business records associated with known illicit massage venues, Polaris has found that the average such business connects to at least one other illicit massage business as well as non-massage venues such as nail salons, beauty shops, restaurants, grocery stores, and dry cleaners. Overwhelmingly, these connected businesses are used to launder money earned from the illicit massage business.³⁴ Given the networked nature of this type of trafficking, traffickers use banks and money remittance services to funnel money to connected parties. Frequently, traffickers structure deposits to fall just under thresholds which would trigger investigation by the financial institutions. Massage parlor traffickers

“He ran many different massage parlors, so as far as fees, there was a basic fee paid by buyers at the door and then extras were discussed in the room. For tax purposes, I was instructed to keep track of just the basic fee at the door as well as any supplies needed to run the business. These numbers were to match up to show there was very little profit after deductions.”

often misrepresent their profits in official tax forms and business record filings. They also spread their finances across multiple accounts and institutions, often forcing victims to establish joint accounts to create the false impression that they are being paid. Unfortunately, determining the actual or “beneficial” owners of many of these businesses is challenging as no jurisdiction in the United States requires disclosure of such information as a condition of business registration.³⁵ Some businesses are registered with no named owner at all. Others are listed as being owned by shell companies that have no other actual assets and also do not disclose the owner.

Financial Patterns of Cantinas

Cantinas are bars and/or restaurants that are typically associated with Latino communities. Victims of sex and labor trafficking within these establishments are forced to provide customers with flirtatious companionship to entice them to purchase high-priced alcoholic beverages that often come with explicit or implicit sex acts.³⁶

Cantinas disguise profits from commercial sex operations as legitimate bar charges, typically as high drink prices or as cover charges for entering the bar. Some commercial sex transactions are also managed privately in cash between traffickers and customers (especially VIP customers) either in the bar's "VIP rooms" reserved for commercial sex, or at offsite locations such as hotels or apartments. Obtaining commercial sex at some cantinas involves several financial transactions, including a cover charge, sale of one or more high-priced drinks, and a final charge for the use of a room and the purchase of condoms.

Cantina operators maintain records for these transactions in a number of ways, often providing tokens such as poker chips or tickets to the customer at the second financial transaction to indicate that the customer has paid this initial fee. The proceeds from this activity are typically divided between the owners and managers of the bar where this trafficking takes place, and the "padrotes" or direct controllers, who bring victims to the cantina to work. In some situations, this division is a simple split of the profits, while in others, the house will take the room fees and the padrotes will take the intermediary fees disguised as high drink prices. It is currently unknown whether these locations typically accept credit cards or whether the commercial sex aspect of the business is entirely cash-based. Since many cantinas are also operational bars and restaurants accessible to the public, it is highly likely that most of them at least have the technical capacity to accept credit card payment. Given the attempts to disguise the intermediary financial transaction as high drink prices, it is likely that this is the stage most likely to be paid for by credit card. Cantina-based traffickers also make large payments, either in cash or via wire transfer, to recruiters or smugglers to maintain a supply of victims for their businesses.

In cases where this detail is known, cantina owners have been known to pay their employees under the table in cash. The owners of cantinas have been known to consistently deposit profits from their businesses in amounts less than \$10,000 in order to avoid detection. More research is required to determine whether cantina operators are regularly laundering their proceeds from these activities in order to further disguise their origin. As in other types of human trafficking, traffick-

ers use various forms of financial abuse such as debt bondage and restricted access to money to control victims at cantinas.

Financial Patterns of Organized Residential Brothels

Organized or semi-organized groups operating residential brothels use credit cards, bank accounts, and money remittance services. Some of these groups may also be associated with commercial front brothel businesses. Operators of residential brothels often rent multiple apartments and other forms of residential properties across several states. These traffickers also purchase food and supplies such as condoms and lubricants in bulk, make wire transfers or remittances to apparently unrelated individuals in other countries, and use multiple unrelated individuals to deposit profits into a single or a small number of bank accounts. Some networks have been known to pay associates to rent apartments in their names in order to hide the networked structure of the operation. Payments for commercial sex at organized residential brothels are typically made in cash to a house manager, controller, or both. The details of pricing, payment for advertising, structure of the network, and techniques of money laundering vary among trafficking groups of different regional affiliations.

Financial Patterns of Un-Networked Sex Traffickers

Among less organized types of sex trafficking such as escort services and some subtypes of residential brothels, payments for ads on online sites may be made using credit cards or cryptocurrencies like Bitcoin. Since Visa and Mastercard stopped processing payments to Backpage in 2015, the use of cryptocurrencies have become a more significant factor in sex trafficking operations. This has presented a new challenge for AML professionals, though recent advancements in technology to analyze Bitcoin transactions are promising (see the accompanying box for more information).

Buying Sex Ads with Bitcoin

The growing use of virtual currencies like Bitcoin, which allow users to limit their interactions with traditional financial institutions, carries both tremendous potential and equally massive risk. The privacy and profit facilitated by cutting out the financial middleman in legitimate transactions also fosters a conducive environment for laundering money from criminal activity such as human trafficking.

The extent to which this is already happening is not well understood. The best known way that cryptocurrencies are used to facilitate trafficking is through the purchase of online commercial sex advertisements. After Visa, MasterCard, and American Express stopped processing payments to Backpage.com in 2015, posters were limited to paying for ads using Bitcoin or Backpage credits. Since the shutdown of Backpage, many other commercial sex websites continue to operate using Bitcoin or other cryptocurrencies. Some sites have even created their own cryptocurrencies.³⁷ As traditional financial institutions continue to hone their AML strategies to disrupt trafficking, the use of cryptocurrency is likely to grow.

That doesn't mean AML efforts will become obsolete – instead the nature of monitoring techniques and the profile of the players involved may evolve. While the most technically savvy criminals can use cryptocurrencies with little traceable footprint, there is still a relatively high entry barrier to using virtual currencies without any kind of third party involvement. This third party involvement provides an opportunity to monitor the use of cryptocurrencies even when these third parties do not function like traditional banks.

In recent years, a swath of financial technology, or “FinTech” companies have launched to make cryptocurrencies accessible to the average person. In 2013, FinCEN regulators issued guidance clarifying that entities “creating, obtaining, distributing, exchanging, accepting, or transmitting virtual currencies” were subject to AML regulations and must register with FinCEN.³⁸

Key within the FinTech sector of the financial services industry, Virtual Currency Exchanges (VCE's) allow individuals to obtain virtual currency by transferring fiat money from an account held at a traditional financial institution. The major VCE's are registered with FinCEN and have their own AML and compliance teams, although unlicensed exchanges continue to exist. Most VCE's must intersect with traditional banks in the conversion process, and this transaction is visible to traditional financial institution's compliance team.³⁹ But this touchpoint can be circumvented through venues such as LocalBTC.com, a Craigslist-like site that allows both licensed and unlicensed exchanges to post ads to sell Bitcoin. Some of the unlicensed exchanges will provide Bitcoin in exchange for cash or gift cards while the most questionable will meet people in person to make the exchange.

As criminal enterprises look for new ways around AML systems, financial institutions are working to meet the challenge with the help of technology partners. Cryptocurrencies like Bitcoin operate using open ledgers which can be mined to identify patterns indicative of criminal activity. For example, computer scientists have pioneered techniques to link Bitcoin transaction records to Backpage ads.⁴⁰ These techniques can be applied to other commercial sex sites which continue to operate, and the resulting analysis can provide new understanding of trafficking networks. This type of research and innovation is crucial to hitting traffickers where it hurts – in their (virtual) wallets.



“Everything was put in my name with [my trafficker] as a co-signer, since [my trafficker] used a fake name, when I escaped, everything faulted back on me.”

“In my case, everything was open under my name or [an]other girl’s name... And then if there came a point where he wanted to buy a car, that’s when he’d open a [checking] account in my name and then he’d just deposit the money... And so we kind of just did it like that with multiple institutions... We basically defrauded each bank. And so now I owe each bank a bunch of money. I can’t even get a second chance bank account!”

In order to avoid detection, many un-networked traffickers force their victims to use their own bank accounts to fund the necessary expenses associated with their own trafficking. Victims of these situations may have transactional histories indicating unusual domestic travel and spend large amounts on gas and hotels. Twenty-six percent of Polaris survey respondents reported that their trafficker used or controlled an account in the name of a victim. However, almost all focus group participants reported that their trafficker avoided putting their name on paper. Using a victim’s identity, especially in the course of managing illicit funds, is not just a tactic to avoid identification, but to further entangle a victim under a trafficker’s financial control. The use of victim accounts and identities by traffickers can have a long lasting and devastating impact. Many survivors leaving trafficking situations report that their credit has been ruined by their trafficker. Others are left to pay debts their trafficker incurred using their identity.

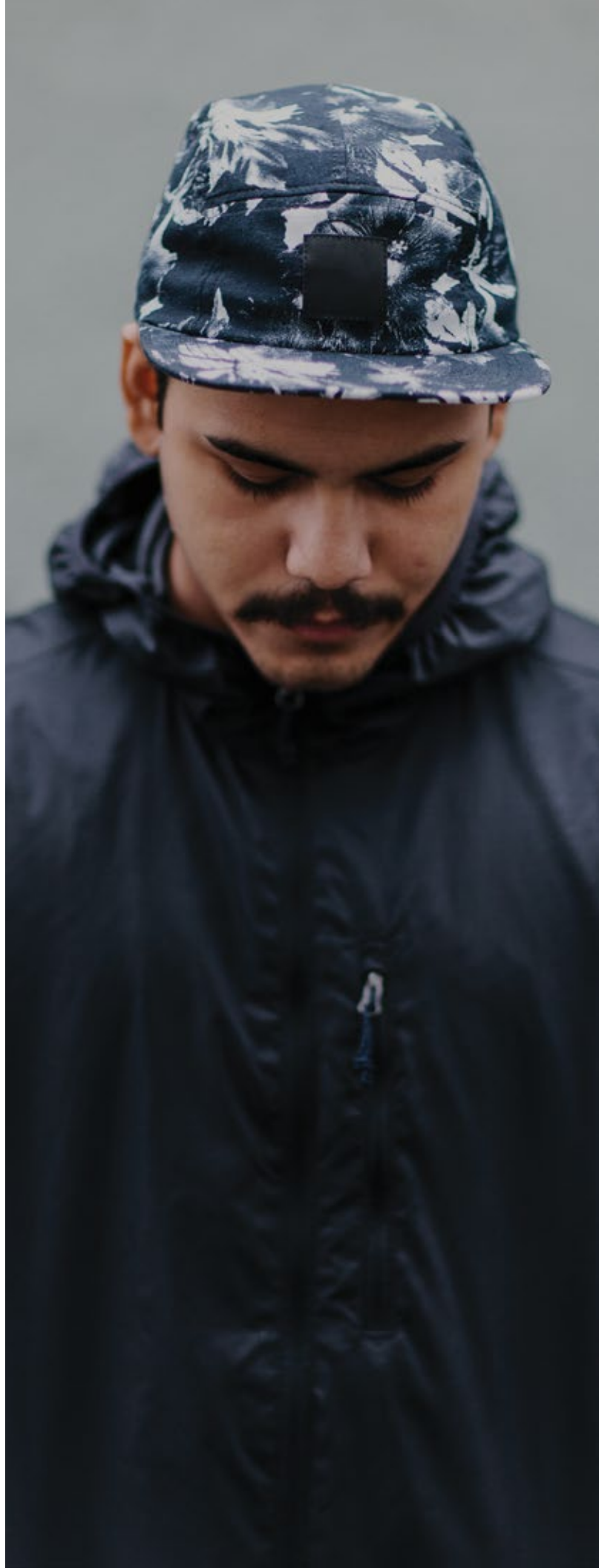
However, above all, according to many conversations with survivors on the Hotline, in the Polaris survey, and in Polaris focus groups, prepaid credit cards seem to be the preferred tender used by un-networked sex traffickers. These cards are difficult to trace using normal transactional monitoring because they enable anonymity. Prepaid cards allow traffickers to use illicit funds to purchase the necessities in order to facilitate their businesses without having their true identity linked to these purchases. Survey respondents and participants in all focus groups reported that pre-paid credit cards were used for almost anything and everything including travel arrangements, living expenses, hotel stays, gas, and online sex ads. Survivors in the focus groups also explained many of their traffickers went a step further to avoid detection and instructed their victims, or even their family members, to purchase and reload these cards.

Financial Patterns of Multi-Victim Labor Trafficking Types

The fact that labor trafficking occurs mostly within legitimate industries (as opposed to sex trafficking which inherently involves an illicit activity), means that labor traffickers use all sectors of the finance industry. From businesses using slave labor applying for loans to expand their operations to paying labor trafficking victims through formal payroll systems, many labor traffickers use legitimate financial systems in ways that are hard to differentiate from other employers. Additionally the fractured nature of the labor supply chain, particularly the use of labor contractors and labor recruiters, makes it difficult to see a comprehensive picture of the finances of all parties associated – especially when each entity in the chain may utilize different financial institutions. Though financial institutions have the power to share information with other financial institutions through Section 314 B of the USA PATRIOT Act, red flag indicators of labor trafficking are so elusive that bank investigations rarely advance far enough to warrant a 314 B request.

As AML professionals pioneer new ways to overcome barriers to detecting labor trafficking through financial activity, it would be wise to focus on industries like agriculture that employ large numbers of foreign national low-wage workers, have non-unionized workforces, and/or utilize labor contractors rather than directly hire workers. All of these factors are associated with structural issues that make workers vulnerable to trafficking.

Notably, industries that employ large numbers of foreign national low-wage workers are likely to hire workers with H-2A, H-2B or other similar visa types. These visas are tied to specific employers. Workers who leave the jobs for which they hold specific visas are vulnerable to deportation. Being deported means that worker cannot come back to work legally in the United States the next year, or indeed ever again. They are either actually or effectively blacklisted. This structural problem within the visa program is a key weapon of human traffickers, who can coerce workers through threats of deportation or blacklisting.



Non-unionized workforces may lack collective bargaining power to address exploitative practices. Industries that do not directly hire their workers but instead obtain them through labor contractors have lower levels of accountability as workers struggle to determine which entity is responsible for their conditions.

Labor contractors are also more likely to have been more directly involved in the recruitment and visa obtainment process where fraudulent promises are often made or debts potentially accrued. Though the fractured nature of the labor supply chain in these industries make AML detection work more challenging, Polaris's data suggests these businesses should be considered high risk for labor exploitation and may exhibit similar financial patterns.

The National Hotline has documented victims of labor trafficking in agriculture being paid by their employers in cash, formal paychecks, or less commonly, through direct deposits into the worker's bank account or in prepaid debit cards. However, more data is needed to determine the prevalence of each method.

In order to effectively detect labor trafficking, financial institutions will likely need to look for bundles of red flags – while each individual may or may not be suspicious on its own, combinations of indicators should be viewed as highly suspicious. For industries at high risk for labor trafficking that use formal payroll structures with paychecks or direct deposits, the most suspicious signs may be the absence of normal business expenses. Potential indicators include:

- Paychecks with negative balances or unreasonably low amounts for an entire pay period (which suggests debt bondage)
- Infrequent payroll processing (suggesting pay may be withheld to prevent employees from quitting)
- Payroll expenditures without worker's compensation insurance outlays (in states required to provide workers' compensation to seasonal/migrant workers)
- Transfers of funds back to employer's account at the end of each pay cycle
- Fines paid to the Department of Labor

A survivor on an H-2B visa from the Polaris focus group clarified how, although he and his co-workers were being paid in formal paychecks, his trafficker still committed multiple counts of tax fraud:

"In my case they paid me with paychecks. But they used another company. Not like a payroll company. It was just another [shell] company they had. Every week the paychecks had all the deductions like state taxes, city taxes, and all that stuff. But I found out when I filed my taxes, that they were not paying those taxes [to the IRS]"

Financial Patterns of Labor Trafficking for Domestic Work

Financial indicators of trafficking in domestic work are quite distinct from other labor trafficking types as the employer is typically a private individual employing one or two individuals. While most domestic workers are covered by the Fair Labor Standards Act (FLSA) and many state laws require domestic workers to be paid at least minimum (if not prevailing wage), potential victim reports to the National Hotline indicate that this is frequently ignored. A review of victims of trafficking in domestic work who were reported to the National Hotline indicates that many of these individuals were not paid. Among those who were and provided detailed information about their hours and wages, many were paid on a monthly basis and often received wages in round number increments in the \$300 - \$1,000 per month range. When hourly wage estimates were calculated, some victims earned less than \$0.50 per hour and nearly all received less than \$9 per hour. These wages were most often paid through direct deposits or wire transfers to bank accounts in the victim's home country that the victim's family may or may not have had access to.

Traffickers of domestic workers may escort the individuals to the bank to make deposits, cash checks, and send wire transfers back into the accounts of the trafficker. Victims of trafficking in domestic work are frequently pressured to list their traffickers on their bank accounts which allows the trafficker to withdraw money at any time, or block the victim's access to the account.

Diplomats employing domestic workers on A-3 and G-5 visas, are required to pay their employees through check or electronic transfers to the domestic workers' bank account located in the United States.⁴¹ Moreover, employers are prohibited from creating conditions that would give them access to this account, such as being listed as a custodian or authorized user.⁴² Despite



these regulations on the diplomatic community, the National Hotline has heard of many cases where traffickers regularly deposit funds, making it appear as if they are paying the victim their salary, only to immediately transfer funds out of the victim's account back to their own. There have also been documented cases where the employers never actually deposit any funds into the victim's account, keeping the active account with a \$0 balance. Victims are often told by their employers that their salaries are held for them until the end of their contracts, or deposited in accounts for them in their home countries, all of which are lies compelling them to keep working. In some instances, traffickers have deposited money in bank accounts overseas or wired money directly to the family members of the victims. However, the amounts deposited or wired were often significantly less than was promised. One survivor who was on an A-3 visa at the time of her trafficking situation, explained at a Polaris focus group:

"My trafficker instructed me to open an account back in my country. She promised to put [a] deposit every month and I put money [in] when the account was open. But she never put any deposits in and turned out, [the account] was closed. At first, I wasn't paid at all. After three months, I was payed cents a day."

Corporate Secrecy Laws In Trafficking Operations

Businesses in the United States are not required to disclose their "beneficial owners" – the people who actually make money from the business.⁴³ As a result, traffickers of both sex and labor are easily able to hide or launder money or simply hide themselves from any legal liability. In some cases, this process is simply a matter of not putting an identifiable name on business registration papers. In others, it is the creation of a complex web of shell companies – businesses without actual assets that exist in name only. In every focus group, survivors provided diverse examples of businesses – some real, some shell – that their traffickers used to conceal their true income such as massage businesses, clothing stores, taxi companies, casinos, restaurants, strip clubs, and even a medical practice. Although focus group survivors were not always privy to the nuances of their trafficker's financial crimes, many of them provided valuable insight:

"We had businesses, we had fake businesses, we had DBA's.⁴⁴ We had businesses that were subsidiaries of other businesses. The businesses would each have bank accounts. The subsidiaries would have bank accounts."

Traffickers also used more inventive ways to manage, move, and conceal their money, like the story of the survivor below:

"We also had virtual offices overseas. So he would have money shipped so he could bank it overseas. So each one of these [offices] took money in. We had storage units where we were stacking money because we couldn't put it all in the bank and we couldn't run it through all the businesses. So we had file boxes full of money in the storage units."

As of May 2018, FinCEN's Customer Due Diligence (CDD) rule went into effect. The rule requires financial institutions to collect information about the beneficial owners of corporate entities applying to open new accounts and to validate the identity of the beneficial owner provided through this process.⁴⁵ However, the resulting system does not provide full transparency into the beneficial owners of companies. The CDD rule's definition of beneficial owner focuses on operational control of the corporation, not on who is entitled to the profits.⁴⁶ Additionally, many shell companies are not tied to accounts at financial institutions, which means they fall through the cracks of this regulation and the identity of the person or persons profiting from that business is never collected.

[For more information on corporate secrecy in human trafficking operations in the context of illicit massage businesses specifically, please see the Polaris report: Hidden in Plain Sight: How Corporate Secrecy Facilitates Human Trafficking in Illicit Massage Parlors.](#)

How Finances may be Used as a Means of Control

Cutting off a victim's access to economic resources can even be more effective than the more overt methods of force, such as physical abuse. Indeed, economic abuse is the most often cited method of control used by traffickers reported to the National Hotline.

"I was trafficked for 13 years, so by the time I was an adult and doing pornography and depositing the checks in the account that he was controlling, I was so terrified of him and so tied to him. The idea of leaving never even occurred to me. I believed the only way it would end would be if he killed me or he died of old age."

"My trafficker never paid me any salary during my first three years of working on the ranch. When he took me to the airport he begged that I come back to work for him. I told him that I wasn't coming back because he did not keep his word from the contract. He gave me \$100, a pat on the back, and kept insisting that I return [the next season]. He had promised that things would change; that I would get a better camper and better food. I then agreed that I would return. Once I arrived [to home country], I had to open a bank account and then he deposited the amount of \$12,920. This is the amount he paid [for 3 years of farm labor] after deducting everything that he had paid for me. Ex: Gloves, Medication, Clothes, Razors, Hygiene Products, Pots, Pans & Kitchen Supplies Sleeping Bag, Batteries, Solar Panel, Electrical Cords, etc. I was charged for absolutely everything he had to buy for my use."

Figure 3.1 breaks down the various forms of economic abuse which the National Hotline tracks, and the types of trafficking which potential victims are reported to be most affected. The absence of sex trafficking in these top results should not be taken as an indicator that survivors of sex trafficking do not suffer frequent or severe economic abuse. These results are likely due to differences in how victims communicate their experiences

when reaching out to the Hotline for assistance. Labor trafficking victims, who frequently do not self-identify as trafficking victims, are more likely to report other legal violations related to their work and pay such as wage theft, debt, or other economic abuse. Alternatively, sex trafficking survivors may prioritize communication about forms of emotional, physical, or other abuse over detailing financial abuse they experienced.

Figure 3.1: Types of Economic Abuse

National Human Trafficking Hotline (January 1, 2015 - December 31, 2017)

Type of Economic Abuse	Top 5 Types of Trafficking (by percent of victims affected)	Percentage of Potential Victims
Creates Debt Bondage or Institutes Quotas	Traveling Sales Crews	37.36%
	Hotels & Hospitality	36.09%
	Restaurants & Food Service	32.48%
	Carnivals	28.57%
	Health Care	24.53%
Withholds Wages	Forestry & Logging	81.48%
	Restaurants & Food Service	73.36%
	Carnivals	71.43%
	Health Care	67.92%
	Recreational Facilities	66.67%
Limits Access to Finances	Arts & Entertainment	30.39%
	Commercial Cleaning Services	18.81%
	Factories & Manufacturing	12.99%
	Health Care	11.32%
	Domestic Work	7.97%
Other Economic Abuse	Forestry & Logging	18.52%
	Agriculture & Animal Husbandry	12.97%
	Construction	12.74%
	Health Care	11.32%
	Domestic Work	10.09%

Data is non-cumulative. Potential victims can experience multiple types of economic abuse.

How the Financial Services Industry may be Used by Victims & Survivors

Restoring Financial Freedom

A victim's access to financial resources is often the single most determining factor when faced with the decision to leave a trafficking situation and start over. Multiple Polaris focus group participants noted the unique role that banking institutions had in their exit safety plans and how critical saving money was. One survivor from a Polaris focus group elaborated on how it was her only safe way to leave:

"[My trafficker] had all the passwords and was a co-signer on [my] account. And pretty much any money that was coming into the account, he knew where it was coming from... I was able to open a separate account without him knowing about it and start[ed] to save away money. It was really dangerous because I was afraid he'd realize I was saving... So that was how I was able to finally get away from him."

A victim's access to a bank account isn't just key in the stage where a victim is planning to leave. Access to a simple checking account can be the first step in rebuilding a survivor's line of credit and therefore his or her road to economic stability. Without this crucial resource, survivors may find it extremely difficult or even impossible to regain even the most basic of necessities such as safe housing, a new job, or even a cell phone. Such economic desperation in turn puts survivors at risk of being re-exploited.

Multiple Polaris focus group participants described how after their traffickers ruined their credit and used accounts registered in their names to conduct fraud and other financial crimes, and because their identities were associated with illicit transactions on websites such as Backpage, financial institutions refused to take them as customers long after they left their trafficking

situations. Two separate survivors in a Polaris focus group discussed how this issue is still affecting them years after their situations:

"I can't even get a [pre-paid card]! I can't get anything. I'm banned! Last year I went to try and get a [pre-paid card] and I put \$300 on there. [The credit card company] took the money, but then they were like, "Oh, there's a problem with the card." So when I called the card [company], they said, "you're basically 86'd from our services because of advertisements on Backpage.com." That's embarrassing!"

"For a long time I couldn't even get [an online money transfer account]!... I had [an online money transfer account] connected to my [commercial sex] website. And so I think they caught onto me and shut me off, banned me for a long time."

"Second chance" bank accounts provide an entry point into mainstream banking systems for individuals with poor credit reports or who may have been previously debanked by a financial institution after being associated with an account identified as having ongoing suspicious activity. Institutions with second chance account programs have different requirements, services, and fees. While such program features typically include low or no fees, they also have more restrictions than traditional accounts, such as limiting daily withdrawals.⁴⁷

Given the prevalence of traffickers conducting criminal activity through accounts linked to their victims, special dispensation for survivors via such second chance account programs is extremely important. Offering second chance accounts is just one way banks are helping survivors rebuild their lives and prevent further exploitation. In many candid conversations during and after Polaris focus groups, survivors of sex trafficking

were heard swapping recommendations of supportive institutions that would “work with them” to rebuild their line of credit. However, there is currently no systematic way for a financial institution to recognize that an individual applying to open an account is a trafficking survivor. NGO’s may be able to play a crucial role in verifying for financial institutions that an individual is a trafficking survivor, and therefore, that bank’s providing a second chance account or alternative accommodations would be appropriate. With this kind of collaboration, financial access can become a reality for more survivors.

Remittance Services

Sending money home through services like Western Union and MoneyGram is a central component of the migrant worker experience in America – including the experience of trafficking and exploitation. The National Hotline frequently hears of trafficked migrant farmworkers who are transported by their employers weekly to a local retailer in order to cash paychecks and hopefully send money home through wire transfers. Sometimes these money transfers are legitimate and used to support family, but sometimes survivors report having to make consistent payments to their labor recruiter in their home country.

In such cases, a transfer agent or a transaction monitoring professional may discover that multiple unrelated individuals are transferring near identical amounts to the same person or recruitment agency on a routine basis. This could be a strong indicator that the worker is paying off a debt, potentially incurred illegally during recruitment.

Tragically for workers who came to the United States because of economic need, many survivors of labor trafficking may find themselves on the reverse end of these transactions – having to receive money from family members abroad in order to survive because they are not being paid by their traffickers. One survivor at a focus group explained:

“I couldn’t make enough money. I was making \$39 - \$40 a week. I didn’t have any money to send back to my family, or even to eat. With all the deductions [for] transportation, visas, extensions, [our] apartment... I just couldn’t. I wish I could. The main reason for me to come to this country was to work for 9 months with an H-2B visa... I took money from my family and friends to pay for the whole program. So ok, if I’m working here, I [should] be able to send money back and pay my debt. [But] my family and friends had to end up sending me money, because I wasn’t making any. So yeah, I was using [a money remittance service]... but to receive money, not to send money.”

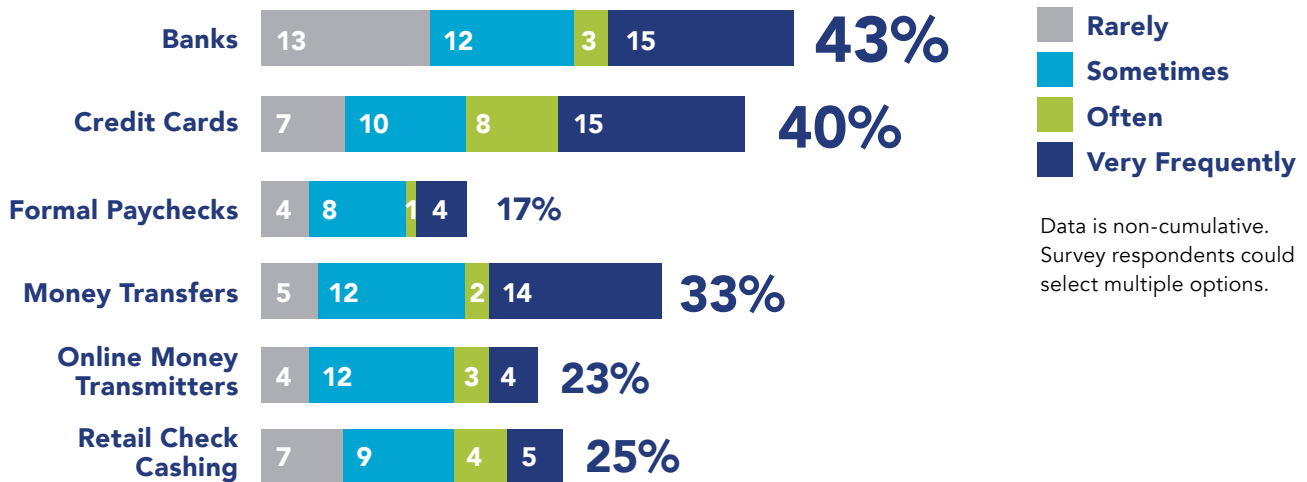
Survivor Contact with Customer-Facing Staff

While AML professionals may be able to detect suspicious activity through patterns in transactional data, customer-facing staff can also be a critical point for identifying victims. Bank tellers and other branch staff may notice, for example, an individual being escorted and monitored while at the bank or an individual’s paycheck or identifying documents being held by this “escort.” Another concerning indicator is if someone is insisting on being listed as a guardian or authorized user on an account. One victim of sex and labor trafficking described how she used bank branches and the red flags that tellers could have detected in her familial labor trafficking situation:

“During one of my labor trafficking experiences... I was often given a [pay]check, yet I was told that I was given a check solely for tax purposes. After receiving the check and cashing it at the bank with my traffickers beside me, I had to then give it back to my them... in cash.”

Many banks already train their customer-facing staff to recognize similar behavioral indicators of abuse and how to document their observations. NGO’s like Polaris can help create training content to educate front-line staff.

Figure 3.2: Victim Access to Financial Institutions During Trafficking
Polaris Survivor Survey (n=99)



Financial Services Industry: Recommendations and Opportunities

For Financial Institutions:

1. Continue efforts to refine anti-money laundering techniques to address variations across trafficking types and evolution in operational patterns

Given the diverse and changing nature of human trafficking operations, developing systems tailored to reflect the nuances of each type of trafficking is extremely challenging. Recent significant changes in trafficking operations include the rise of cryptocurrencies and the seizure of Backpage.com. As traffickers continue to evolve, so too will the models and systems built to detect their activities. The financial services industry should be applauded for its innovative and proactive efforts to meet this challenge and continue its efforts to stay on top of shifting patterns.

In order to detect trafficking situations with diverse operational practices, many financial institutions have partnered with anti-trafficking organizations like Polaris, law enforcement, and survivor leaders to better understand the distinct patterns of various types of trafficking. These collaborations are crucial and should be continued. Survivors of trafficking have integral knowledge about their traffickers' criminal behaviors with finances, and therefore should be thought partners with financial institutions as they work to develop new ways of detecting and hopefully preventing the facilitation of human trafficking.

Many stakeholders active in this area have rightly identified the need for better data sharing systems to facilitate these efforts. While sophisticated data sharing platforms may be a long-term goal, privacy concerns, legal restrictions, and a lack of resources will likely

make this ambition difficult to obtain in the near-term. In the interim, financial institutions, non-government organizations, and government actors – particularly FinCEN, and law enforcement entities – can develop lower-tech collaborative relationships focused on educating financial institutions about trafficking operations and partnering to understand how these activities may manifest in financial records. It is important that federal and state bank supervisors recognize the importance of this innovative work and support financial institutions by allowing them flexibility to adapt their practices to address a rapidly evolving crime.

Resources created specifically for anti-money laundering professionals on human trafficking are available through the [Association of Certified Anti-Money Laundering Specialists \(ACAMS\) Resource Page](#)

2. Leverage investment and lending systems to address slavery

Financial institutions' efforts to date have been essential to disrupting trafficking and holding traffickers accountable. However, the financial services industry also has unparalleled influence to prevent trafficking through investment and lending transactions. Investors and lenders should consider the significant reputational and potential liability risks associated with clients who have slavery in their supply chains. A good practice would be to require clients in high risk sectors to take proactive measures to mitigate risks through their investment terms. While creating slavery-free supply chains requires action from all involved parties, investors can play a critical role in these efforts. In order for this work to scale, more diverse players in the financial services industry need to be engaged -- including private equity firms, mutual funds, and investment banks.

Further work needs to be done to refine due-diligence frameworks for investment and lending. In order for this work to be effective, nonprofits, international government organizations, government agencies, data providers, technology companies, and financial institutions should collaborate to develop more effective business-level risk scores, which must be continually updated and refined.

3. Assist survivors in rebuilding their economic portfolio

Working with survivors, financial institutions can examine and implement ways in which their policies and procedures could be adapted to provide better options for those looking to rebuild credit and otherwise relaunch their financial futures:

- Financial institutions should consider creating account qualification exception programs for identified survivors of trafficking who provide documentation from a credible service provider or law enforcement body attesting to their victim status. Polaris welcomes conversations with institutions interested in collaborating to establish frameworks through which NGO's could assist in the verification process and allow these programs to scale.
- Financial institutions should offer low-to-no fee second chance accounts to survivors, with a pathway to advance to a regular account after a period of successful account maintenance.⁴⁸ While created for a different purpose, New York City's SafeStart program may offer an account model that banks could consider replicating. Through this program, participants can establish accounts with no monthly fees, no overdraft fees, an ATM card, and a low minimum balance requirement of \$25 or less for the first two years.⁴⁹ Second chance accounts include restrictions which minimize the risk to the financial institution while increasing financial inclusion among survivor populations.
- Financial institutions should accept addresses provided through a state's official Address Confidentiality Program (ACP). FinCEN has concluded that such an address is a valid substitute that satisfies Customer Information Program (CIP) requirements.⁵⁰ ACP's are widely used by survivors who need to keep their physical address confidential to ensure their continued safety. By providing participants with substitute addresses to use

for various purposes such as creating a bank account, registering to vote, or obtaining a driver's license, ACP's prevent abusers from locating their victims through searching for them in various registries and databases. Financial institutions accepting these addresses will help keep trafficking survivors safe.

- Financial institutions should establish partnerships with anti-trafficking organizations that assist survivors, following the many financial institutions that have already developed such programs and partnerships. These partnerships could include credit-building microloans or other financial assistance programs to help victims restore their financial resources. The Independence Project through the National Network to End Domestic Violence (NNEDV) is an exemplary model to follow. Additionally, such partnerships could involve providing free financial counseling or financial literacy courses to survivors and advocates. [Allstate Foundation Purple Purse](#) is already a leading initiative carving out long-term financial security for domestic violence survivors. Its financial literacy modules can be found through its online platform.

4. Train customer-facing staff and make the National Human Trafficking Hotline number publicly accessible to potential victims

Many victims of human trafficking, particularly in rural settings far from major population centers, do not have regular contact with anyone in the United States other than their traffickers or others at their job sites, except when visiting check cashing venues or money transmitters. These businesses already post information for their customers about identifying fraud. Similar educational resources about a migrant worker's rights, and about how and why to contact the National Hotline, could provide a lifeline to otherwise isolated victims. Businesses could provide this information on receipts, in their online portals, or separate brochures or palm cards.

It's important that language and visuals be culturally relevant and accessible in a wide variety of languages and to people with limited literacy. Survivor consultants and NGO's such as Polaris can consult on the creation of these materials. Additionally, some financial institu-

tions have led initiatives to train customer-facing staff to identify red flags associated with trafficking, document those observations, and follow established reporting processes. Polaris, other NGO's, and survivor advocates can assist in providing content and material for these trainings. This practice can be adopted by financial institutions with customer-facing staff, big or small.

For the Public Sector:

While this report focuses on the private sector, government collaboration and action is necessary to truly create systemic change. We have identified several areas where public sector work could facilitate and strengthen the financial services industry's efforts.

1. Pass legislation to allow for transparency of beneficial ownership

In order to obfuscate investigative efforts, many traffickers purposely avoid providing information about the individual or individuals who profit from a business. Polaris supports the passage of federal legislation requiring all businesses registering in the United States to disclose the business's actual owner – termed “beneficial owner” in this context.

Financial institutions are required to collect information about the beneficial owner on corporate accounts at the time of an application for a new account. But the current regulation's definition of beneficial owner focuses on the corporate officers in control of the business's operations, not on the individual or individuals profiting.⁵¹ Additionally, because many shell companies do not have bank relationships, information about their beneficial owners is not collected. A government entity should be responsible for collecting such information from all business entities, with the promise that it will be disclosed to law enforcement as needed to assist in investigations. While conceivably, state governments could be responsible for collecting such information, FinCEN or the IRS would be a more efficient party to do so, as well as yield more consistent record keeping. At the time of publication, several bipartisan pieces of legislation before Congress meet these standards, although do not necessarily have the same collection processes. These include the [TITLE Act](#) and the [Corporate Transparency Act](#).⁵²

2. Pass legislation to provide safe harbor to facilitate information sharing between civil society and financial institutions

NGOs that work with survivors and vulnerable populations often have access to critical information about bad actors. Regulations focused on the sharing of information between financial institutions or between financial institutions and government agencies, such as Section 314(a) and (b) of the USA Patriot Act or the regulations for filing Suspicious Activity Reports (SARs), provide appropriate protections for such sharing. No such protections are currently available to NGOs for sharing critical information that may assist in the detection, deterrence or prevention of trafficking.

While NGO's are currently able to report tips directly to law enforcement, the information may be too limited to realistically spur law enforcement action – often because the information is obtained from confidential sources who cannot be contacted by law enforcement. However, if these leads were provided to financial institutions, the financial institutions may be able to assist in providing additional, relevant, and actionable information to law enforcement.

Addressing the liability concerns of NGO's which wish to participate in information exchanges is an important first step in actualizing this process. Legislation is required to provide these protections to NGOs. Once this barrier is removed, law enforcement, NGO's, and financial institutions can work together to develop agreed upon processes and protocols that govern appropriate information sharing.

3. Increase resources to relevant government agencies to expand efforts to collaborate with financial institutions

Government agencies – particularly law enforcement – have access to critical data and insights which can further efforts by financial institutions to identify, disrupt and prevent trafficking. However, resource constraints,

the need to maintain secrecy around investigations and other factors can impede the flow of information.⁵³ Advancements in the fields of data science and technology can help mitigate these barriers. Resources need to be allocated to obtain, create, and use these technical solutions.

FinCEN may be well situated to lead one workstream focused on increasing the amount of information sent to financial institutions about financial patterns associated with trafficking. While FinCEN already works to provide this information through SAR Activity Reviews and other types of guidance, having access to cutting edge technologies would allow FinCEN to provide more timely and specific information. One approach could involve creating a system which automatically records information about which suspicious activity reports (SAR's) were returned in proactive law enforcement queries for bad actors law enforcement became aware of through other channels.

This data, coupled with FinCEN's database of AML/Counter-Financing of Terrorism (CFT) investigations, could be used to create models to predict which SARs are likely to be associated with law enforcement investigations.⁵⁴ Partnership with the Human Smuggling and Trafficking Center (HSTC) which has created an impressive data analysis program and regularly reviews SAR's would further strengthen this analysis. FinCEN could also compare SAR filings to other proxy datasets of entities at high risk for trafficking, such as actors named in civil suits alleging human trafficking and businesses associated with serious labor violations reported by the Department of Labor. The resulting analysis could be shared with financial institutions on a regular basis to help refine their monitoring and investigation efforts.

Beyond identifying trafficking, government information is vital to prevention initiatives and efforts to facilitate increased financial access for survivors. Law enforcement and other government agencies such as the Department of Health and Human Services could be important partners in creating processes to verify applicants for second chance accounts. Implementing technical solutions which seek to mitigate data security and privacy risks associated with sharing sensitive information should be a core component of this workstream.

4. Eliminate institutional barriers to pursuing financial crime investigations in concert with traditional trafficking investigations

Although allowing a survivor to share their story through criminal testimony is an incredibly powerful experience, not all survivors are able or willing to testify against their traffickers or cooperate with a traumatic human trafficking investigation. Money laundering, financial crime, or fraud charges can carry significant penalties and put a trafficker out of business for good. Educational initiatives to train law enforcement, particularly at the local level, on what information is available, how to query and understand that information, and how to utilize that information in investigations are necessary. For example, providing training on financial information provided by financial institutions to FinCEN could be informative. While some law enforcement agents may routinely utilize FinCEN's SAR database, others may not be familiar with this resource.

In addition to more generalized educational efforts, the organizational structure of some law enforcement initiatives may create structural barriers to pursuing financial crime-investigations in concert with traditional trafficking investigations. Human trafficking and financial crime investigations are frequently handled by distinct departments within law enforcement agencies. This bifurcation may prevent collaborative efforts to pursue trafficking and financial charges in tandem. Law enforcement handling human trafficking cases can make a practice of considering whether a finance-focused investigation is possible whenever trafficking-related cases are opened, particularly when the case involves networks or are connected to formal business entities. In areas with human trafficking specific task forces, inclusion of law enforcement specializing in financial crimes can yield better collaboration and more successful outcomes.

If you're an anti-money laundering or banking professional and want to learn more about working with Polaris, please contact corporateengagement@polarisproject.org



Hotels & Motels

Hotels & Motels



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

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

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

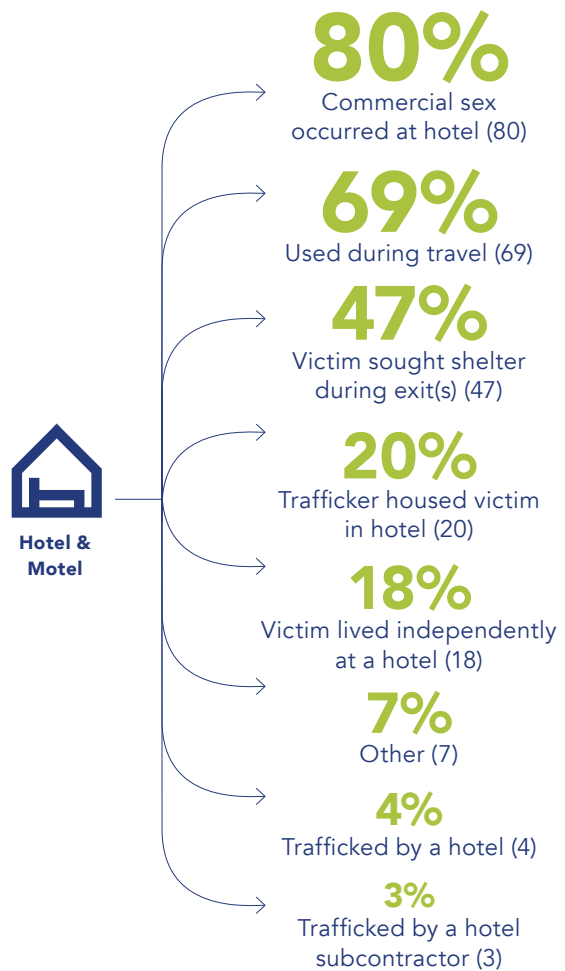
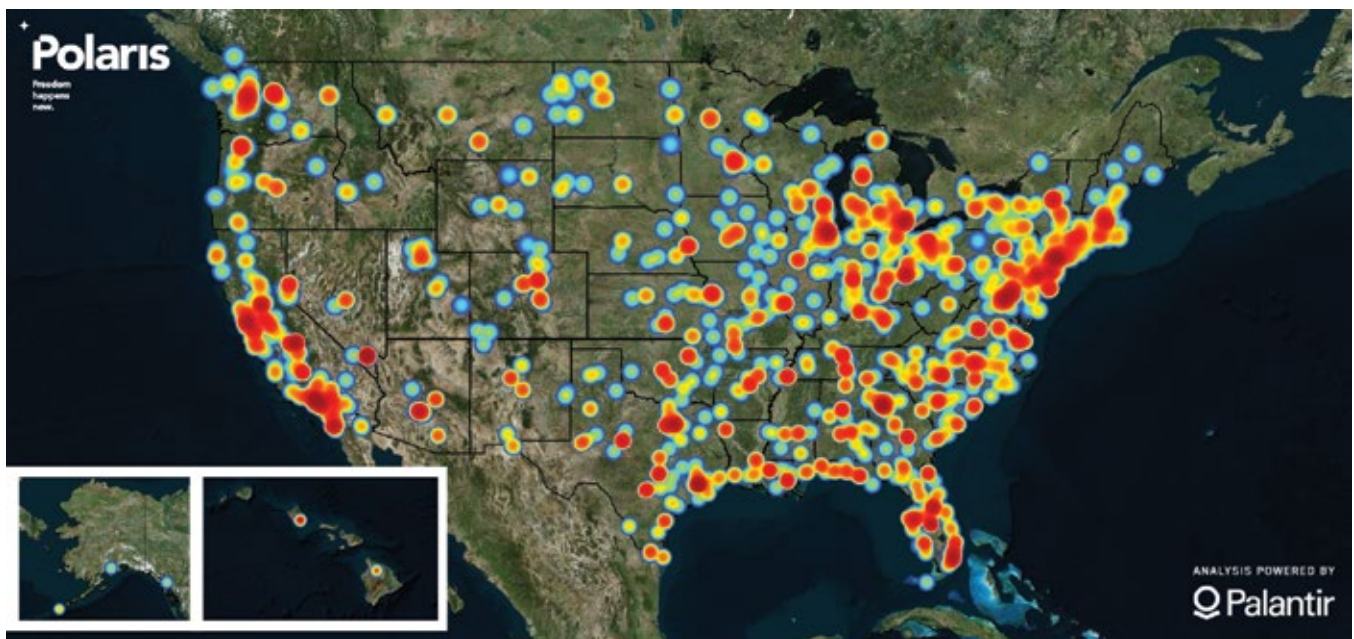


Figure 4.1: Locations of Potential Trafficking Cases Occurring at a Hotel/Motel

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



How Hotels & Motels may be used in Recruitment

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

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



How Hotels & Motels may be used in Trafficking Operations

Hotels used in Escort Services

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

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

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

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

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

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

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

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

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

Figure 4.2: Hotel & Motel Reservations

Polaris Survivor Survey (n=100)

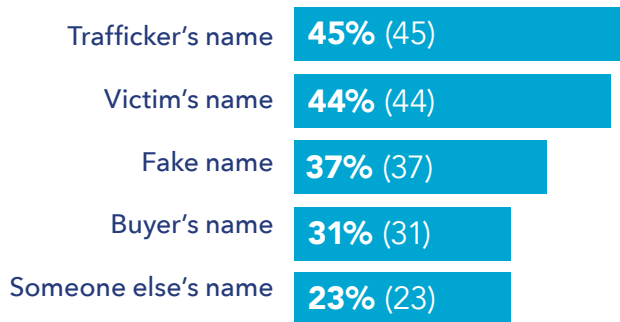
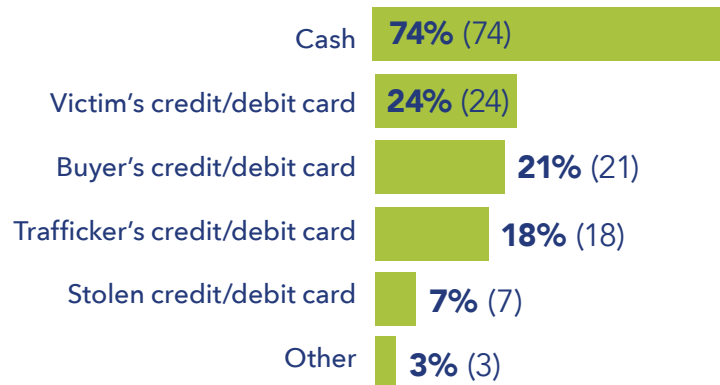


Figure 4.3: Hotel & Motel Payment

Polaris Survivor Survey (n=100)



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

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

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

Hotels used in Other Types of Sex Trafficking

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

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

Trafficking Indicators in Hotels & Motels

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

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

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

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

Hotels used in Traveling Sales Crews

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

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

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

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

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

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

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

Labor Trafficking within the Hotel Supply Chain

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

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

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

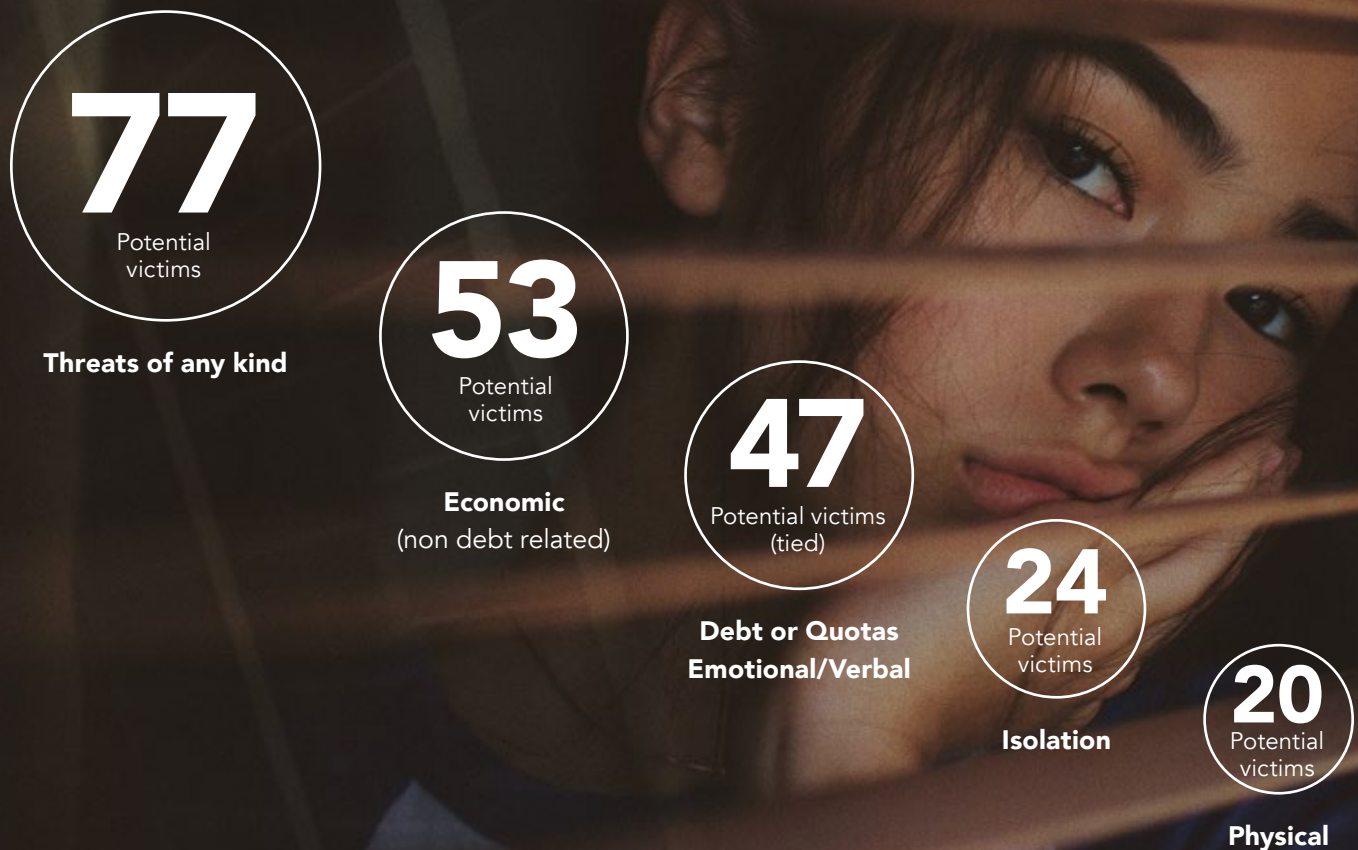
ing conditions, ranging from inhumane living conditions, to low or no pay, to verbal, physical, and sexual abuse. Yet leaving is not a real option for most. In the case of the H-2B visa holders, their legal status in this country is tied to their specific employer. J-1 visas provide the option for visa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

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

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

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

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



How Hotels & Motels may be used by Victims & Survivors

Victim Interactions with Hotel Staff

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

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

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

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

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

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

Survivors Utilizing Hotels for Shelter

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

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

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

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





INDUSTRY SPOTLIGHT: Wyndham Hotel Points Program

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

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

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

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

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

Victim Identification in Hotels

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

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

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

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

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

↓ Photo courtesy of The SOAP Project.



Hotel & Motel Industry: Recommendations & Opportunities

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

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

2. Hotel Points Donations and Local Shelter Support

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

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

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

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

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

4. Establish a Response Plan Involving a Safe Reporting Mechanism

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

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

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

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

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

6. Directly Hire Employees Whenever Possible

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

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

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

8. Post the National Human Trafficking Hotline for Victim Access

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

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

9. Advocate for Appropriate Hotel-Related Legislation

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

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



Transportation Industry

Transportation Industry



The following matrix is meant to be an overview of some of the intersections that diverse types of private, public, and mass transit systems may have with potential victims and traffickers of various types of trafficking (See [Typology of Modern Slavery: A Summary](#) section of this report). Each dot can represent one or more touch points throughout a trafficking life cycle including during recruitment, during trafficking business operations to move potential victims, traffickers, and/or buyers, or by potential victims and survivors during and after their trafficking experiences. All intersections were informed by Polaris’s operation of the National Human Trafficking Hotline since 2007, Polaris survivor survey, Polaris focus groups, or additional, but not exhaustive, external research and analysis which may include service provider and stakeholder knowledge sharing, scholarly research, media articles, documented civil and/or criminal cases of human trafficking, or quantitative and qualitative analysis of external data sets and/or public records. This matrix is by no means comprehensive, as potential traffickers and victims have the potential to access many types of transit systems or vehicles. The absence of a dot may mean there is insufficient data or research on the intersection. Polaris omitted the types of trafficking where research and data were lacking.

		Types of Transportation				
		Private vehicles (incl. rentals & business)	Airlines	Trains	Buses	Ridesharing & Taxis
Types of Trafficking	Agriculture & Animal Husbandry	●	●		●	
	Arts, Sports, & Entertainment	●	●			●
	Bars, Strip Clubs, & Cantinas	●	●		●	●
	Carnivals	●	●			
	Commercial Cleaning	●	●			
	Domestic Work		●		●	
	Escort Services	●	●	●	●	●
	Forestry & Logging	●	●		●	
	Health & Beauty Services	●	●			
	Illicit Activities	●				
	Illicit Massage Businesses	●	●		●	●
	Landscaping	●	●			
	Peddling & Begging			●	●	
	Pornography		●			
	Residential Sex Trafficking	●	●		●	●
	Restaurants & Food Service	●	●		●	
Traveling Sales Crews	●			●		

While the term trafficking triggers associations with transportation, in reality, in the United States, the crime of human trafficking does not require movement or travel of any kind. However, almost every type of human trafficking does wind up intersecting with transportation systems at some point, depending on the business model.

Thankfully, many in the transportation industry have acknowledged the presence of human trafficking in this sector and are actively taking steps to address it. The U.S. Department of Transportation (DOT) has committed to various cooperative activities with Amtrak and the Department of Homeland Security's (DHS) Blue Campaign to train staff in identifying potential victims, link victims with assistance, and to build awareness amongst large captive audiences waiting to board their bus or train.⁶³ In 2012, DOT also launched Transportation Leaders Against Human Trafficking (TLAHT), an initiative which has brought together over 200 organizations from across the transportation industry to focus on industry leadership, industry training and education, policy development, public awareness, and information sharing and analysis.⁶⁴

Polaris has also consulted as key advisors to the DOT'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.

The growing importance of technology in the transportation sector likely offers many more additional opportunities to identify survivors and disrupt trafficking situations through analysis of data that may show patterns of use associated with certain types of trafficking.





INDUSTRY SPOTLIGHT: Truckers Against Trafficking

Truckers Against Trafficking (TAT) is a grassroots organization that works with the trucking industry to educate, equip, empower, and mobilize its members to fight human trafficking as part of their everyday jobs. TAT's goal is to create a mobile army to aid law enforcement in the recognition and reporting of this crime in order to assist victims and have perpetrators (buyers and traffickers) arrested. TAT recognized that, by virtue of their training to be observant, the fact that they regularly outnumber law enforcement on the road, and in their sheer numbers, trucking professionals were in a position to become a disruptive force along trafficking routes. As bystanders to this crime, trucking professionals simply needed to understand what they were seeing in their travels and what actions to take. Through the training and tools it provides, the relationships it builds, and the industry experts it partners with and listens to, TAT works to drive systems and paradigm change through network leadership.

To maximize its reach across the industry, TAT continually looks for and takes advantage of every identifiable entry point into trucking, from law enforcement and legislators to schools, carriers, state and national organizations, truck stops, shippers, manufacturers, and state agencies. In intersecting with each of these, TAT has provided educational tools as part of the process for creating effective pathways into the industry. It has been one of the most fervent champions of the National Human Trafficking Hotline, heavily promoting the numbers to its vast network since 2009. As a result, the National Hotline has received 734 cases of potential sex trafficking occurring at truck stops since

TAT's founding.⁶⁵ Nearly 58 percent of these cases were directly reported by trucking professionals. However, Polaris believes a large part of the remaining 42 percent of reported truck stop cases can also be attributed to TAT's training and advocacy efforts.

The work of Truckers Against Trafficking constitutes a highly replicable model across modes, industries and borders. When traffickers count on ignorance or apathy – whether within the general population or a market sector -- to exploit a human being, an opportunity exists for a bystander to intervene, for a trained and vigilant individual or army to recognize what is actually happening and take action. Every person, working within their sphere of influence, can play a critical role in fighting this crime by effecting social change – whether in reporting the crime, introducing the concept and training to others, being the catalyst for company policy change, or becoming a "TAT champion" and working to raise either personal, corporate or industry involvement to the next level. This, in turn, often elevates TAT's standing both within and outside of the industry, allowing rapid expansion of the model into other industries. A perfect example of this can be seen with Busing on the Lookout (BOTL), where trucking professionals have used their overlap influence in the bus industry to create entry points for TAT to successfully launch BOTL and begin successful integration into that industry.

For more information on Truckers Against Trafficking or Busing on the Lookout, please visit their website: www.truckersagainsttrafficking.org

How the Transportation Industry may be used in Recruitment

Although most victims of human trafficking will indeed utilize some form of transportation in the course of their recruitment, the reality is, at this stage of the trafficking life-cycle, individuals likely do not suspect anything to be suspicious about their destination. Victims may believe they are simply traveling to meet a new boyfriend, enter an exciting job opportunity, or simply going on vacation to meet new friends and see new sights. This makes identification and victim outreach extremely difficult (though not impossible) during this stage. Despite this fact, it's still important to recognize the myriad of ways traffickers are relying on these systems for a steady supply of vulnerable individuals, and the types of transportation systems involved.

“If we didn’t rent a car, which usually we didn’t, then when the girls were out to work, him and his friends would go in an Uber to the strip clubs to try and get new girls. Or I know he had a taxi that he was cool with in a couple different cities, where the guy would give him a \$50 nightly rate and he would just drive him up and down the [track].”

Informal Bus Systems

In Polaris’s work with service providers and law enforcement specializing in illicit massage businesses (IMB’s), the use of informal buses, often colloquially referred to as “Chinatown buses,” came up across many cases as a significant site for recruitment. “Chinatown buses” are privately owned bus lines that typically connect Chinatown neighborhoods in major metropolitan cities. Originally intended to shuttle Chinese restaurant workers between jobs,⁶⁶ these buses provide more affordable transit compared to mainstream bus companies such as Greyhound. They also provide fertile ground for IMB trafficking recruiters, who hand out business cards to young Chinese women, many of whom are working or heading to work in grueling restaurant jobs for meager pay. This semi-captive audience is the perfect target audience of promises of lucrative work in the “massage” industry.⁶⁷

It’s worth noting that although IMB traffickers have learned to use Chinatown buses to their advantage, the foundational use of these buses by the unregulated recruitment agencies catering to the 40,000+ Chinese restaurants in the country are also likely to end in severe forms of labor abuse, if not labor trafficking. After charging potential victims a recruitment fee and matching them to a restaurant job, these underground recruitment agencies will give the potential victim a slip of paper with minimal Chinatown bus route information, but no destination address, pay information, or conditions about the job itself. After they are dropped off to their new bosses, they find themselves stuck bus-ing tables or cooking in kitchens for meager tips, little to no base salary, for upwards of 12 hours a day and no days off.⁶⁸ This type of abuse is common in many of the 595 cases of potential labor trafficking and additional 1,340 cases of potential labor exploitation in the restaurant industry that have been reported to the National Hotline since 2007.

Bus & Train Stations as Recruitment Grounds

While individual sex traffickers - pimps - look for opportunities to recruit wherever and whenever opportunity presents itself,⁶⁹ bus stops and train stations present particularly good trawling grounds, stocked with vulnerable people who have time on their hands.

Of particular interest to traffickers is the proliferation of runaway or homeless youth who tend to congregate in these venues, either because they are seeking ways to leave their current living situation or because they have nowhere else to go and transit hubs often serve as a shelter of last resort.

Traffickers or “bottoms” (a term some pimps use to refer to a victim still under their control but who has “earned” a higher ranking among the other victims and may share recruitment responsibilities at the behest of the trafficker) tend to approach potential targets and strike up what seems to be an innocuous and friendly conversation about their travel plans. According to Hotline calls, potential recruiters can sometimes take the bus or trains with potential victims to further build rapport, offer to “hang out” and kill time while they wait, or simply offer to give them a ride instead of the long bus/train trips potential victims have planned.

To a runaway youth, any offer that does not involve returning to the place they are trying to get away from is likely to be at least marginally attractive.

This was the case for 11-year-old S.H. who, according to court records, was sleeping at a bus stop in the early morning hours, when Shelby Lewis pulled up and invited her into his vehicle, noting that he’d seen her the previous day. Evidence was presented that Mr. Lewis went on to recruit 13-year-old T.S. in a similar way when he woke her up while sleeping at a bus station to offer her a safer place to sleep. Court documents stated Shelby Lewis went on to force the children into commercial sex for more than 2-3 years each⁷⁰ and was eventually sentenced to 20 years in prison.⁷¹



Buses Used to Transport Victims to their Trafficker

Even if the initial contact or relationship building has happened elsewhere - like online - long-distance buses seem to be a highly utilized method for initially transporting potential victims of sex trafficking to their traffickers. According to Hotline accounts, potential traffickers typically buy the tickets up front, often holding the gesture over the potential victims' heads as a form of manipulation and/or debt. While payment types and methods (online vs. phone vs. in person) and the types of bus tickets used (physical vs. e-tickets) need more research, anecdotal evidence from the Hotline have suggested that traffickers will commonly purchase and reserve tickets under the potential victim's name ahead of time. The potential victim is either emailed the ticket

or picks it up at a physical station. If the potential victim is lacking identification (perhaps because of their minor status or other socio-economic reasons), a pass-code can get them access to the pre-purchased ticket for most companies.

In traveling sales crews, it is routine for potential traffickers to use the promise of transportation as an enticing "perk" of joining the crews. According to the Hotline, crew managers falsely promise that whenever a worker wants to leave, they will foot the bill for a bus ticket home. Furthermore, much like in sex trafficking, potential traffickers tend to purchase bus tickets for victims joining their crews. The recreated Facebook screen grabs below follows a recruitment and Greyhound bus travel coordination in real time.



Chris B @JoeyD I'm tryin to get in touch w/ @DaveF. I'm ready to go meet up with the crew. Stuff is packed, for real! Hit me up. I'm tryin to be there today.

4y · Like



Joey D Hey man, trying to get a hold of him now. He'll confirm with @MeganC. Head to the Greyhound. What's your location? We'll order your ticket.

4y · Like



Chris B I'm in Sante Fe, NM. My stuff is in trash bags ready 2 go.

4y · Like



Joey D I'll call Greyhound to order your ticket to meet us in St. Louis. You got your ID? No problem if not, we can send you a password to get the ticket.

4y · Like



Chris B Cool. Found my ID. I have a ride droppin me off at the Greyhound at 12:30

4y · Like



Joey D Booked it! Your bus is at 1:30pm. I'll DM you the confirmation number. Get ready to make that money and have a blast!

4y · Like

← Sales crew comment thread on Facebook which shows a recruitment coordination with bus involvement in real time. Based on actual public comment threads, but recreated with name and other detail changes to protect any potential victims involved.

Airlines used in Recruitment

Airlines are used in transporting hundreds of thousands of migrant workers from all over the world to the United States every year. For instance, a 2014 Urban Institute report indicates that 71 percent of their surveyed sample of labor trafficking victims arrived in this country via airplane before they were trafficked. Select layover cities include Miami, San Francisco, Atlanta, and New York City before flying to their final destination.⁷² While many airlines train in-flight personnel on recognizing the signs of

trafficking, in these cases, where the exploitation has not actually begun, there are likely to be few or no observable signs. Knowing the flight patterns offers other potential avenues for outreach. For example, strategic outreach campaigns educating travelers on warning signs of suspicious jobs, in their own languages, might be beneficial in these layover states to reach potential victims of labor trafficking, including women who have or may be recruited into illicit massage businesses.



How the Transportation Industry may be used in Trafficking Operations

There are very few businesses that don't at least occasionally require travel or transport. The business of human trafficking is no different. The types of transportation or travel services used depends on the specifics of the business - how secretive or clandestine transactions are likely to be, for example, or whether there are large numbers of people or commodities that have to be moved at once. In Polaris's survivor survey, **63 percent of respondents utilized some combination of mass transit such as public buses, subways, and publicly accessible transportation services including long-distance buses, taxis, and rideshares.** Furthermore, 16 percent of survivors qualified their contact with such systems as "very frequent." Not surprisingly, travel and transport in automobiles was by far the most common mode of movement in business operations.

"In my situation, traffickers... purchased 4 mini vans to be used to transport us (group of workers) from our apartment to our job and vice-versa. Money that they took from us, (\$500.00 from each) that we gave them in advance, as a deposit, which we were supposed to get back at the end of the program. On top [of this], they charged us the cost of the [daily] transportation and it was deducted from our paychecks."

Personal, Business, and Rental Vehicles

According to Polaris's survivor survey, a personal vehicle owned by the trafficker (or someone else other than a victim, but not including a rental, taxi, or rideshare) was the most commonly used type of transportation (81 percent) during trafficking. Seventy-three percent of survivors stated they or their trafficker owned or leased their own car during their exploitation.

In sex trafficking in escort services, transportation is essential for traveling long distances between cities and states, as well as locally between individual "dates" with buyers. Personal and rental vehicles are also used to drop off victims at hosting strip clubs and bars, and outdoor areas such as "tracks" and truck stops. One survivor of escort services at a Polaris focus group tells why a car was her trafficker's preferred method of transportation between the cities they worked:

"For me it was mostly the car, because we can stop in different cities, stop in different truck stops. Everything was you know, game and sell. So it was mostly the car. They [traffickers] would drive [us]... to Fresno, Bakersfield, Los Angeles, [Las] Vegas, Phoenix, Texas..."

In Polaris focus groups, most survivors explained they would often travel alone to dates.

"...Most of the transportation was all through vehicle. I would get a call for a date [and]... mostly I drove myself, because to have [my trafficker] there would be like an endangerment to him... Sometimes he [drove], but mostly I would drive myself there."

Although, some survivors' experiences differed and they noted they would be driven by a bottom or by their trafficker.

“When I would post as a dancer and [doing] escort service[s] he was always taking us, he was always in the car. I don’t know if he didn’t trust us or if he didn’t like to be alone? But he was always with us when we would go on dates. He would put his chair all the way back or he would be laying down in the back seat. If you took too long, he would text.”

Traffickers tend to be much more likely to allow more senior victims and bottoms to travel to dates and new cities alone due to the deeply ingrained psychological control and manipulation held over them. The longer the trafficker has invested in indoctrinating a victim to their control, the harder it may be to think of straying. Another survivor explained how her travel autonomy would depend on the trafficker’s trust level:

“It just depended on the situation and what we needed, if he was feeling like I was gonna try leave, then he would try and come with me to every out-call and he would go out of town with me. And if he was in a trusting state, he would send me out of town by myself or he would make sure that there was another girl that he trusted to watch me and make sure that I didn’t leave. It was just situational.”

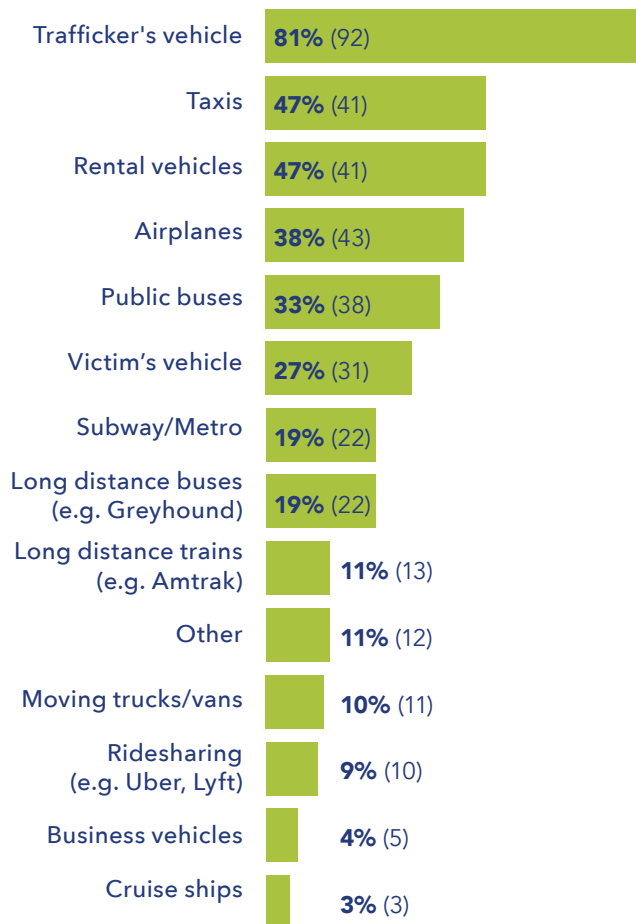
Survivors in Polaris’s survey noted that rental cars were used in 47 percent of their trafficking situations. Focus group participants elaborated that their traffickers would often force victims to rent cars in their own names while working new cities in order to keep the trafficker’s name off paper. One sex trafficking survivor explained how her trafficker took it one step further and used the race of victims to avoid possible detection from police:

“[Traveling between dates was done] either by taxicab or he would take me sometimes. If we were in the city where we lived in... then it would be his own car. But if we were in a different city, it would be a rental car... For the most part he would use the rental cars in the girls’ names... Usually it was the white girls [driving] because they were the least suspected and they wouldn’t get pulled over as much as the black girls.”

While traffickers in illicit massage businesses may use commercial transportation systems such as airlines and informal bus systems to transport victims to their initial IMB, traffickers tend to rely on personal vehicles when shuttling victims between business locations. This kind of travel is frequent as most IMBs are networked, meaning owners have more than one business and also team up with other IMB owners to keep the supply new and “exciting” for buyers in a single location. IMB traffickers are also more likely to utilize private drivers who are more fully integrated into the trafficking network. This is in contrast to the more informal business relationships traffickers maintain in less-organized types of sex trafficking. The use of private drivers allows IMB traffickers to maintain more control and isolation over their victims who must rely on their traffickers for transportation. It also allows traffickers to maintain their own transportation schedules without having to rely on standard bus routes or make purchases that create a paper trail.⁷³ These private drivers can sometimes be a relative of a trafficker. This was the situation in a recent Ohio trial, where two sisters ran the trafficking operation and one of their husbands served as the driver.⁷⁴

Figure 5.0: Methods of Transportation Used by Victims or Traffickers During Exploitation

Polaris Survivor Survey (n=104)



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

According to Hotline cases and additional Polaris research, sales crews typically travel in one or a fleet of multi-passenger vans, depending on the size of the crew. Some crews have been known to travel in full-sized SUVs or smaller vehicles as well. More research is needed on the typical ownership and registration of the vans, but it is likely that they are owned and registered under the official business name of the sales crew. However, since many crews have a long history of fraud-related complaints from customers, it is common for crews to change their business names and ownership to avoid liability. Therefore, the vehicles' ownership and registrations are believed to also be in flux. 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, passing through tolls and often utilizing rest stops.

Sales crews are also notorious for violating motor vehicle insurance regulations, maximum vehicle occupancy laws, and vehicle safety regulations. Sales crew vehicles can often be ridden with hazardous conditions like a lack of seats and seatbelts, and may have unlicensed drivers behind the wheel, which have been the cause of numerous and sometimes fatal accidents. This was the case for 18-year-old Malinda Turvey, and six other victims who, according to media reports, were killed in a fatal collision on March 25, 1999 in Janesville, Wisconsin when they were working for Youth Employment Services, a traveling sales crew. Media reports stated, as a police officer attempted to follow their van, the unlicensed driver attempted to switch seats with a licensed passenger as they were barreling down the highway at 81 miles per hour.⁷⁵ Five others were seriously injured and the driver and crew manager served prison time.⁷⁶ In 2009, Wisconsin passed "Malinda's Law," which among other things, began to mandate that all sales crews operating in the state of Wisconsin ensure that their vehicles are regularly inspected and drivers are insured and licensed.⁷⁷ According to many accounts on the National Hotline, it is routine for crew leaders to have unlicensed potential victims drive the vans which often results in fines, warrants, and arrests for victims which further ties them to their employers. All this makes these vans particularly susceptible to routine traffic stops, causing a prime opportunity for identification.

There are several other 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 may be found in potential human trafficking cases related to construction, landscaping, forestry, commercial cleaning services, and home health care. Agriculture can use these mobile crews to a lesser extent. While more research and data is needed, Hotline evidence suggests that crews are

often transported in personal vehicles, either belonging to the trafficker, the business, or a potential victim. It's also clear that they rely on the infrastructure of streets, tolls, tunnels, bridges, etc. Carnival crews, while they are not subcontractors, engage in regional travel as a core component of their business model and are at high risk for potential labor trafficking and exploitation.

Taxis & Ridesharing Services

Tied with rental cars as the second most reported transportation method among Polaris survey respondents, **47 percent reported that taxis were used in their trafficking situation** - mostly to transport survivors locally between dates.

Only 9 percent of survey respondents reported using a ridesharing service such as Uber or Lyft during their trafficking. This is more than likely due to survey and focus group participants being trafficked during a time that predated the general availability of these services. This should not be considered representative of how prevalent ridesharing services are in the course of sex trafficking in escort services or human trafficking operations generally. In fact, all survivor participants in sex trafficking focus groups who now work as service providers for current victims and survivors all attested that their clients frequently (if not exclusively) use services such as Uber and Lyft when traveling to out-call appointments.

"I would like to say that now, working with women that are absolutely active or have just gotten out of the life, yes, they all use Uber and Lyft."

Survivors in Polaris focus groups largely viewed a taxi driver's role in responding to individual sex trafficking cases negatively. In every sex trafficking focus group there were multiple survivors who disclosed that their trafficker often made use of illicit local taxi drivers when transporting victims to commercial sex sites. These relationships ranged from an informal friendship to more of a formal business partnership with the driver being on the trafficker's payroll. One survivor explained:

"I had a cab driver that was on payroll. He came and got me and the other girls... around 9:30[pm] so that I got to the track by 10 every night and coming back he would meet me at the store around 2am. Every night."

The use of unscrupulous taxi companies or individual taxi drivers is similarly found in the transport of victims in IMBs, especially in large cities like Las Vegas.⁷⁸ More complicit and involved taxi drivers may work directly with traffickers and knowingly transport victims to other IMBs, or even directly to buyers. One focus group survivor who was sex trafficked in a similarly organized criminal network, shared her story with the taxi drivers involved with her traffickers:

"My trafficker's association had a transportation business and they had a small motel business. [And they] all were connected... So whenever [there was] cash, there was a taxi driver that [would] pick me up and I would hand the money to the manager of the motel... I believe they laundered the money through those businesses... They used their own people in the transportation company... the taxi driver is on the payroll but they would be going and picking up the customer. When my trafficker needed something, it [was] fast. It was always available."

Buyers also make use of taxi companies to access victims of forced commercial sex services. Some taxi drivers, although not formally part of a trafficking network, act as accomplices and receive commissions from IMB traffickers for recommending and transporting buyers to their IMBs.⁷⁹ More limited data suggests similar arrangements for organized residential brothels. Additionally, it's worth noting the possibility of buyers intentionally using taxis or ridesharing services in their visits to brothels and IMBs in order to conceal their identity and not expose their license plates to possible detection.

Even when taxi drivers were not direct accomplices to a trafficker's business operations, survivors in focus groups consistently shared their negative experiences involving taxi drivers as buyers, drivers coercing sex from victims in exchange for rides or not turning them into police, drivers robbing victims, and even drivers attempting to traffic them as one survivor described:

"I remember one night I took a cab from [hotel redacted] back to my house and the driver picked up on the fact that I was leaving [hotel redacted] at 2 o'clock in the morning... Next thing I knew he was telling me he had access to other buyers who he could connect me with and he would just take a cut of them. So, I'm sitting in the backseat like "are you really trying to pimp me right now?"

Another survivor told Polaris the horrifying story of how her trafficker would frequently pay a taxi driver an enhanced fee to drive them around aimlessly, just so he could have a confidential and somewhat anonymous place to physically assault her.

"Taxi drivers take payment all the time [from traffickers]. When I lived in [Midwest City redacted] [my trafficker] paid a taxi driver all the time [to] pick me up so he could beat me up in the back of this taxi cab. [One time] I had fell asleep in a room with a [buyer]... [My trafficker] paid the taxi driver to bring him up there and paid the cab driver an extra \$100 so the cab driver would not call the police on him after he beat me up in the back of the cab... Same thing happened a few times in [another city]."

As a result there was an almost unanimous consensus in the focus groups that taxi drivers, and by extension, ridesharing drivers, are not individuals that survivors would necessarily trust, even if support or intervention was directly offered. Although most survivor participants explained that they do believe taxi and ride-sharing companies have an obligation to be trained on identifying potential trafficking, they were vehemently opposed to drivers extending direct assistance or attempting to assess the situation further. Instead, many survivors supported such companies implementing a reporting protocol to the National Hotline



(or police if it was an imminent situation or involving a child). Other more innovative technology solutions for ridesharing companies were suggested such as flagging suspicious rides in the driver's app, data sharing and analysis initiatives, and making the Hotline number available to users in creative ways not involving direct communication with the driver.

Buses and Trains

Of the 104 survivors who responded to survey questions regarding transportation systems, a total of **42 percent stated that they or their traffickers utilized local or long distance buses in the facilitation of their exploitation** (33 percent said public buses were used and 19 percent said long distances buses were used). In regards to trains, **27 percent stated that trains were used during their exploitation.** This includes 11 percent of respondents who used long-distance trains as one of many forms of transit and 19 percent who noted subways were used. Although personal vehicles, rentals, and taxis were used most often, within trafficking in escort services, some survivors in focus groups said that long-distance bus and train companies such as Greyhound and Amtrak were used when personal vehicles were not available to travel to and from cities. The use of buses and trains may be a preferred method of transportation for traffickers because of the low cost and limited interaction with bureaucratic systems. This allows them more anonymity in the ticket buying process and less attention from officials.

"We used a lot of train transportation, Greyhound, Amtrak... and planes. We tried to stay away from planes as much as possible."

The survivors in focus groups that mentioned the use of long distance bus services specifically, said that they were typically used when they were sent to work in a new city alone (i.e. not traveling with their trafficker). Although this finding is largely anecdotal at this time, and more research is needed, it exposes an interesting access point that these companies may have at reaching victims when traffickers cannot directly monitor them. In these scenarios, victims may feel safer to notice an outreach poster, jot down a helpful number, or have a casual conversation with a concerned transportation professional.

Little is known about the precise ways these transportation systems are used in the operations of labor trafficking scenarios (if at all). However, based on National Hotline interactions, these systems are much more likely to encounter potential victims in the course of an exit attempt (see How the Transportation Industry may be Used by Victims & Survivors section of this chapter).

Airlines

While focus group participants noted that traffickers tended to prefer the flexibility and comparative anonymity of ground transportation to air travel when conducting their business, **38 percent of survey respondents said they did travel by plane at some point during their exploitation.** Flight patterns and behaviors will largely vary from one trafficking operation to another. Some survivors in focus groups stated they traveled by plane every few weeks and some stated their air travel was extremely rare. One survivor whose trafficker made her and upwards of seven other victims at one time travel together, often using elaborate cover stories to avoid suspicion, explained:

"We traveled probably every season. We would travel to different state[s]. Sometimes we never stayed in a state for any longer than a month at a time. We would go in a big old circle, to Miami, New York, Jersey, then come to the west coast, Vegas, Hawaii in the winter time. It was like a circle. It was mainly the same cities... and it would be for like a month at a time that we would go to each city."

While airlines are rarely used in the course of most labor trafficking operations, there are some instances where domestic workers who have been trafficked in other countries then accompany their traffickers to the United States. In these scenarios, the airline industry is indeed in a pivotal position to possibly observe indicators related to abuse or control on flights and during check-in or security check procedures.

“I traveled all over the United States, and attempted once into Canada. But yeah, I flew at least once a month, either by myself or with... my wifies, and the bottom was usually with us.”

The survivors in focus groups who utilized airlines explained that their travel was rarely booked in advance since their traffickers typically responded to the day-to-day market demand of each city. Since airline fares are typically very costly on the day of travel, this may be another reason traffickers prefer vehicles or bus and train systems. Whenever possible, traffickers paid for tickets in cash when booking flights. One survivor elaborated on her trafficker’s system:

“Yea for the most part, when I lived out [west], the bottom would call Southwest and make arrangements because you could reserve tickets then go pay in cash at check-in, so we did that quite a bit. That way we didn’t have to put anything on cards.”

Another described:

“Usually pimps carry a lot of cash on them and they’re paying for the ticket in cash that same day. There were a lot of times when our traveling was spontaneous. It would be like, “Okay, pack up we’re going to Hawaii today”... Spontaneous bookings and using websites like Hotwire, Expedia...”

When traveling to a new city to post new online ads and solicit multiple dates, traffickers typically accompanied their victims. However, more focus group survivors stated that their buyers were mostly responsible for reserving and paying for their flights, presumably when they would book multi-night dates with one buyer. On these trips where they were being delivered directly to a buyer, focus group survivors explained they would typically travel alone. One sex trafficking survivor explained that her traffickers “toured” her, which means they advertised her ahead of time and pre-booked her for dates in various cities across the country for about a week at a time. She explained that after a week or so providing commercial sex every hour, on the hour, sometimes for 15 hours a day, with very few breaks for food or sleep, the physical and behavioral signs she exhibited on a flight home were pretty hard to miss - if anyone had been looking, and if anyone had cared enough to ask.

Potential Indicators of Human Trafficking Using Airlines

Airline professionals at all levels of operations may be able to detect possible red flags that may indicate potential human trafficking in both traffickers and victims. Below are just some observable signs for which to be vigilant. However, not all of these indicators are indicative of human trafficking on their own. As an example, and as airline professionals know best, many individuals who are not being trafficked show observable signs of anxiety and fear when flying. It is important to note that you should not rely on physical appearance alone when identifying potential trafficking situations -- traffickers and victims can be different genders and ages, wear different styles of clothing, and may or may not have tattoos or piercings. Furthermore, it should go without saying that an individual's race/ethnicity, or how their race may or may not differ from their co-traveler's (interracial/adopted families, significant others, etc.) are not indicators of human trafficking. One of the reasons why it is so important to train airline personnel how to identify and respond to trafficking is so they do not find themselves relying on superficial indicators (which can lead to higher instances of misidentification), but instead are able to consider all of the relevant information before them, evaluate the indicators in the context of the situation at hand, and use tools at their disposal to determine appropriate next steps in accordance with internal airline protocols. Under no circumstances should potential victims be detained or rigorously questioned without their consent.

- ✈ Adult not in possession of their own passport and travel documents
- ✈ Potential victims not being able to speak for themselves (e.g. potential traffickers answering questions and making decisions for victim)
- ✈ Little to no knowledge of destination or who is meeting them
- ✈ Scripted or inconsistent stories
- ✈ Traveling with few personal items
- ✈ Clothing inappropriate for climate, or used to conceal signs of abuse
- ✈ Overly fearful or anxious behavior
- ✈ Verbal abuse
- ✈ Controlling behavior (e.g. potential victim not being able to freely move about the cabin or interact with other passengers)
- ✈ Physically aggressive behavior (e.g. potential trafficker shoving a victim or violently grabbing their arm)
- ✈ A denial of food or beverages on flights
- ✈ Signs of malnourishment, physical abuse, and/or exhaustion
- ✈ Little to no eye contact
- ✈ Flight booked same day and paid in cash or with pre-paid credit card
- ✈ Use of pre-paid credit card, or potential trafficker in possession of large amounts of cash
- ✈ Individuals in possession of multiple cell phones

Trucking, Shipping and Freight

Just like the hospitality industry, the transportation industry is not void of trafficking happening on their properties or within their own supply chain. According to the National Hotline, sex trafficking can be present at commercially-operated truck stops as well as state-operated rest areas and welcome centers due to their remote locations and the male-dominant customer base that use the facilities. These locations are often insulated from local rural communities, making it a convenient place for traveling customers to purchase sex with minimal concerns of detection. Potential sex trafficking victims are coerced by their traffickers to solicit customers by means of advertising over CB radio, knocking on truck cab doors, walking up and down the tarmac, or directly approaching and offering services to potential buyers. Since December 2007, potential sex trafficking at truck stops have comprised 734 cases (or 37 percent) of the 1,983 cases of the outdoor solicitation business model. Since January 2015, 327 individual potential victims have been recorded on truck stop cases reported to the Hotline, 147 of

which (45 percent) were children under 18 years old. According to hundreds of potential victim accounts from the Hotline, survey, and focus groups, traffickers are likely to utilize truck stops and street blocks in combination with other business models like escort services and strip clubs. It is relatively rare for a trafficking operation to rely exclusively on outdoors as their primary market place, although this does occur with some potential victims.

While still a type of trafficking yet to be fully defined within the Hotline's dataset, labor trafficking in the transportation industry warrants more attention and research. The National Hotline has managed a total of 30 cases of potential labor trafficking within transportation industry, including individuals being forced to remain in exploitative jobs in trucking and shipping industries, moving companies, and taxi services. Potential victims are often recruited with fraudulent contracts on legitimate visas, and may be held in debt, not paid, and threatened with deportation and harm if they attempt to leave or speak out.



How the Transportation Industry may be used by Victims & Survivors

Survivors fighting for their freedom face complex psychological barriers and equally complicated concerns about safety, about shelter, and about their futures. Tragically, it is a far more prosaic concern - transportation - that keeps far too many people in situations of exploitation for far too long. In Polaris's survivor survey, 54 percent of survivors noted that access to transportation was a barrier to their leaving their situation.

Many transportation industry leaders have stepped up to try to reduce this figure. For example, both Delta Air Lines and Southwest Airlines provide flight vouchers and point donations to the National Hotline to assist survivors in their efforts to relocate. But there are still likely too many situations in which a survivor does not know help is available and turns around or gives up for want of something as simple as a ride or a bus ticket.

"I still don't own a car. I ran away on foot and ended up needing to take a bus to get away. Limited income can prevent girls from leaving."

Survivors Using Buses During Exits

Overall, 26 percent of Polaris survivor survey respondents stated that public and mass transportation played a role in at least one of their exit attempts.

Buses were the most frequently used method of transportation survivors in the Polaris survey and focus groups used as a means of exiting their situations. Buses may be good options for a number of reasons, including relative low cost and high levels of safety, since these public terminals often come equipped with the appropriate security and/or dedicated police.

Annie Sovcik, Director of Busing on the Lookout, an initiative operated by Truckers Against Trafficking (TAT), says: *"When victims are able to get out, a bus or bus terminal may be the first place they'll go to find safety or escape. In those precious moments when they are so vulnerable to getting lured back, boarding a bus may be the only way they can afford to get away."*⁸⁰

Following are just a handful of the testimonies provided by survey and focus group participants on how pertinent bus systems were to them during this stage:

"I took buses every time I ran away."

“I don’t drive so I relied on public transportation when I left my trafficker and having access to it where I lived helped economically with me leaving the situation.”

“Every time I got on Amtrak or a bus, I was running away. My family was my ticket.”

Even at relatively low price points, however, bus transportation may still be out of reach to victims who leave their situations with no funds at all, only to find themselves turning around and heading back to the abusive situation because they have no other options.

This is a situation the National Hotline hears all too regularly from potential victims and service providers. In one example, two male potential labor trafficking victims were working in agriculture in a rural town whose closest access to shelter was a three-hour drive. Even if buses, trains, taxis, or ridesharing were available, the men had

no money to reach the shelter. The Hotline had to work with local police to pick the men up and drive them to a safe place to stay. While important, this is hardly an ideal use of scarce law enforcement resources for that area. Access to travel points or vouchers could have made a tremendous difference in this situation.

Although funding is often the most pressing issue preventing survivors from utilizing transit systems when leaving, certain systems’ policies can also create barriers. One survivor at a Polaris focus group told a story of how a regular customer purchased her a bus ticket home. When she arrived at the bus terminal, she was unable to obtain the ticket because her trafficker had confiscated her ID. Her trafficker found her at the bus station hours later and she was returned to her trafficking situation. This is the kind of situation that could be addressed through bus and train companies creating discretionary protocols and alternative options for survivors of abuse or other at-risk populations who need access to tickets purchased for them, but have no identification.

Survivors Using Rideshares During Exits

Ridesharing companies like Uber and Lyft are also integral in the process of leaving abuse as they often fill geographic gaps where public transit does not reach. As mentioned before, many survivors that attended Polaris focus groups now provide services to victims of trafficking, which sometimes include coordinating a victim’s safe exit and transition into their services. Such situations are generally carefully planned and coordinated with service providers to ensure the safety of all involved. Survivors are typically extremely aware of their own safety. They know better than anyone when to leave without their trafficker’s knowledge and how to ensure they are not followed. One survivor advocate elaborated on how her organization has come to rely on these companies at such a pivotal time:

“We’ve used [Uber] to help women in other states escape...In the situations when we have used an Uber for that specifically, it has been a thing where the victim has reached out and said “I need a ride, I have a window of opportunity, here’s the address I’m going to go to that’s safe. Can you please send a ride for me?” And that’s generally how that’s played out.”



Ideally, such escapes would be facilitated in concert with the National Hotline or a local service provider to add another layer of protection for the victim and the driver. The Hotline and service providers work collaboratively with survivors to develop a unique safety plan that considers all potential factors.

Buses in Victim Identification in Domestic Work

Since December 2007, the National Hotline has noted 73 cases of potential human trafficking for domestic work that have connections to ground transportation systems such as taxis, buses, and trains. Although domestic workers are notoriously isolated, oftentimes spending many hours working within the household, transportation systems can sometimes be used when the victim must grocery shop and run errands for her employers. Public bus drivers are an especially interesting access point for potential victim identification since they tend to be assigned the same route and could have consistent interaction with a potential victim. Unfortunately, many domestic workers still live in isolated suburbs without public transit systems altogether, so this transportation access point may be still limited.

Along the same lines, and potentially even more frequently accessed, are school bus drivers since nannies experiencing trafficking and exploitation often must pick up children from school bus stops every day. In one notable case from the National Hotline, it was another parent at the school bus stop who picked up on and reported red flags concerning a neighbor's nanny. It turned out that this daily 15 minutes at the school bus stop was the potential victim's only time she was ever allowed outside of the home. Over the next few days, with the assistance of this neighbor, Hotline Advocates were able to gather more information on the situation, speak to the potential victim safely and discreetly to determine her wishes to leave, and coordinate her exit.

Trucking, Shipping, & Freight in Victim Identification

Since truck drivers for shipping, freight, and parcel delivery services typically have consistent route assignments, they may also have a consistent window into exploitation happening along those routes inside warehouses, restaurants, and other businesses where few others see the “back of the house.” The same goes for the U.S. Postal Service mail carriers, and UPS drivers in commercial businesses and residential areas. USPS, UPS, and

other parcel delivery personnel are similarly in direct and often personal contact with potential victims and potential traffickers in domestic work, making them a critical resource in identification, as well as access and support. As outstanding trailblazers in this initiative, both FedEx and UPS have partnered with Truckers Against Trafficking to receive training for their team members on how to identify and respond to trafficking while on our nation’s highways.^{81,82}



INDUSTRY SPOTLIGHT: Delta SkyWish Program

While training staff on trafficking victim identification is an important step, transportation businesses looking to make a significant impact in the fight against human trafficking can do as much good by providing resources to support survivors, both as they leave their trafficking situations and as they journey down the often long road of recovery. The needs of survivors are as diverse as their trafficking experiences, but they almost always include access to some form of transportation. Removing the obstacle of paying for transportation -- whether it’s to exit a trafficking situation or travel to a facility for long-term care -- can make the difference between a survivor obtaining the help they need to restore their freedom and falling back into the arms of their trafficker.

Delta Air Lines’ SkyWish program is a prime example of a company using its resources to help break cycles of abuse and ensure survivors have the support they need in order to access critical services. Through this program, Delta SkyMiles members with unused miles in their accounts can visit the SkyWish website and donate those miles to Polaris. Polaris then uses the miles donated through the SkyWish program on the National Human Trafficking Hotline to cover the airfare survivors need to return home or relocate after

leaving their trafficking situations, receive critical services, reunite with their children or families, travel to testify against their traffickers in court, or engage in survivor leadership opportunities. Delta also generously matched the first three million miles donated by their customers. The SkyWish program goes beyond standard corporate social responsibility models. Not only is Delta offering its support as a company, but it is affording its customers and employees the opportunity to personally get involved and make a tangible difference in the lives of trafficking survivors.

Just in 2017 alone, donated SkyMiles have funded approximately 70 flights for survivors. In one success story, an adult female potential victim of gang-controlled sex trafficking was extracted from the situation with the help of law enforcement and a local service provider. The service provider reached out to the National Hotline requesting transportation assistance in getting the victim back to her home state. The National Hotline was able to use donated SkyMiles to purchase a Delta flight for the victim to get back home to her support system which included her family, a law enforcement victim’s advocate, and a longer term service provider.

Transportation Industry: Recommendations & Opportunities

1. Travel Vouchers or Points Donation

There is a glaring lack of transportation options available to survivors, even once they make the brave decision to leave their trafficking situations. Often unable to purchase their own cars, and lacking funds to purchase their own bus, train, or plane tickets, survivors are left to figure out other means to get to shelter, other social services, and/or job interviews. Where possible, we would encourage public and private transportation companies to implement a philanthropic model to donate credits, points, or vouchers to organizations that directly serve survivors of trafficking. Companies could take such a program a step further and allow customers to donate their credits directly to select anti-trafficking organizations as well. This invaluable resource would allow survivors to access life-saving services during the moments when they need them the most and send a clear message to a company's customer base that the company is on the right side of the counter-trafficking fight. Partnering with Polaris would allow these transportation credits to be distributed to service providers and survivors on a national scale through operation of the National Human Trafficking Hotline, much like the Sky Wish Program in partnership with Delta Air Lines.

2. Post Prevention-based Materials at Transit Stations & Airports

Polaris recognizes the pioneering efforts of government and NGO initiatives aimed at increasing general awareness about human trafficking at transit terminals. However, because the majority of victims will often start their journey into trafficking through one of these transit hubs, prevention materials targeted directly to at-risk

populations is a direction that deserves more resources and traction. Strategically messaged outreach materials such as posters and PSAs have the potential to reach potential victims before they even reach the person who will go on to exploit them. Messages on such materials should focus more on preventative language and highlight indicators that would be present before a trafficking situation actually starts. Some examples may include potentially suspicious behaviors such as promises, “too good to be true” job offers, or unhealthy relationship red flags. While not all future victims will identify their situation with these red flags at the early stages of exploitation, some may connect the dots and have second thoughts. Even if the outreach materials do not necessarily prevent the victim from continuing on their travel, planting the seed that certain behaviors are suspicious and indicative of something more insidious makes it more likely that the potential victim will reach out for help if the situation escalates.

3. Develop an Employee Anti-Trafficking & Demand Reduction Policy

(adapted from *Truckers Against Trafficking and Businesses Ending Slavery and Trafficking*)

Adopt a formal employee policy that prohibits employees from using the company's services, work time, or vehicles to facilitate or aide in human trafficking or to procure commercial sex. Such a policy should be implemented at all levels of the company's hierarchy, and should involve immediate termination and possibly law enforcement action if an employee is found to be in violation. Having this formalized policy is not only a smart move for a company's risk management and reputational concerns, but sends a clear message that the company will not stand idly by while bad ambassadors of their brands are contributing to modern slavery.

This type of policy might be particularly relevant for taxi and rideshare companies for whom it may be necessary to rebuild trust with sex trafficking survivors or individuals in the sex industry. The Seattle-based non-profit, [Businesses Ending Slavery and Trafficking \(BEST\)](#) is a resource for interested businesses to learn more about internal policies they can adopt in their commitment to stopping human trafficking.

4. Train Staff on What to Look for and How to Respond

All employees should be aware of the specific types of trafficking that are most likely to utilize a form of transportation or company. Transportation businesses are encouraged to work with anti-trafficking organizations and survivor leaders to develop data-driven, survivor-centered, and tailored training modules for staff across all levels of the business. Designated training and enforcement from government regulatory agencies, including the Department of Transportation (DOT) or the Federal Aviation Administration (FAA) and others, would provide an extra layer of oversight to ensure that compliance plans are effectively upheld.

5. Develop Survivor-Centered and Trauma-Informed Response Protocols

For awareness and victim identification training to be truly valuable, it must be accompanied by strong protocols to support staff in their response. These protocols should give staff very clear directions about what to do upon, for example, potential identification, and should be designed collaboratively with survivors to ensure these protocols are survivor-centered and don't cause further harm or trauma. For example, if a potential human trafficking situation is identified, advise employees to not attempt to intervene directly or detain potential victims. Additionally, if a survivor is an adult and does not wish to involve police, respect their wishes and connect them with the National Human Trafficking Hotline instead. Finally, companies are encouraged to seek research and data to inform ongoing efforts, with an emphasis on monitoring and evaluation to assess the effectiveness of specific interventions and policy/pro-

cedural changes. For example, one idea is to institute a cross-departmental anti-human trafficking task force which meets semi-annually to evaluate the execution of protocols in response to recent cases.

6. Display and Promote the National Human Trafficking Hotline Number

Even if a business is under obligation to use another type of law enforcement tipline, it's always a good idea to additionally include the National Hotline number on all awareness and prevention materials. Utilizing the Hotline as a resource and lifeline can be a good alternative when a survivor needs to be connected with an advocate or service provider, rather than law enforcement. The Hotline number should be prominently displayed, both in company offices/headquarters, user apps, and in vehicles/planes for both employees and customers to see.

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



Health Care

Health Care



The following matrix is meant to be an overview of some documented intersections that survivors or potential victims of various types of trafficking (See [Typology of Modern Slavery: A Summary](#) section of this report) have had with health care. Unless otherwise cited, all intersections were informed by Polaris’s operation of the National Human Trafficking Hotline since 2007, Polaris survivor survey, Polaris focus groups, or anecdotal information received through communication with clinicians. This matrix is by no means comprehensive, as trafficking survivors have the potential to access health care in any medical specialty. Each dot may represent one or more touch points throughout a trafficking life cycle including while the victim is being recruited, exploited, or after being trafficked. The absence of a dot may mean there is insufficient data or research on the intersection. Please note: in particular, the noted intersections with labor trafficking are very limited due to the lack of research on health care accessed by labor trafficking survivors. Polaris omitted the types of trafficking where research and data were lacking.

Please see [Methodology](#) section of this report, as Hotline data, the Polaris survivor survey, nor the Polaris focus groups should be compared to the findings of more rigorous academic studies or prevalence estimates. If you are a professional interested in this type of medical literature, please visit: [HEAL Trafficking’s Health Literature Library](#)

		Types of Health Care Services					
		Emergency Medicine	Pediatrics	Mental Health	Substance Use Disorder Treatment	Reproductive Health	Residential Care Facilities
Types of Trafficking	Agriculture & Animal Husbandry	●	●			●	●
	Bars, Strip Clubs, & Cantinas	●	●	●	●	●	
	Carnivals	●					
	Construction	●	●				●
	Domestic Work	●	●	● ⁸³		●	●
	Escort Services	●	●	●	●	●	
	Factories & Manufacturing	●	●		● ⁸⁴	●	●
	Forestry	●					
	Health Care			●			●
	Illicit Activities		●	● ⁸⁵	●	●	
	Landscaping	●	●				
	Outdoor Solicitation	●	●	●	●	●	
	Personal Sexual Servitude	● ⁸⁶	●	● ⁸⁷	●	● ⁸⁸	●
	Pornography		●			●	
	Residential Sex Trafficking	●	●	●	●	●	
	Restaurants & Food Service	●	●			●	

There is growing evidence on the range of health consequences faced by individuals who have experienced human trafficking. This includes, but is not limited to sexual and reproductive health issues, mental health concerns, on-the-job injuries caused by unsafe working conditions, and issues related to substance use.^{89,90} Getting care for these and other health needs while in a trafficking situation may be difficult for a myriad of reasons that this section will outline.

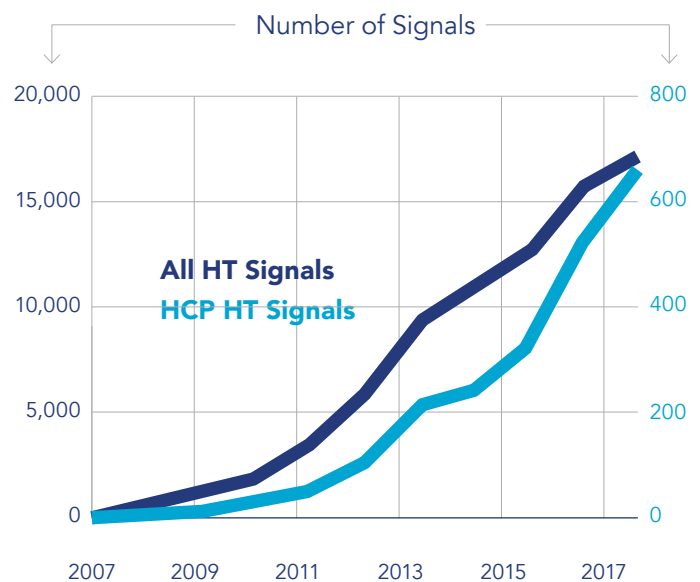
However, despite barriers to accessing care, in Polaris’s survivor survey, **69 percent of respondents reported having had access to health services at some time during their exploitation** and **85 percent of those said they had received treatment for an illness or injury directly related to their work or exploitation.** Indeed, other recent studies have found that anywhere between 50-88 percent,^{91,92,93} of human trafficking victims have accessed health care services during their trafficking situations. Clearly then, the health care system is rife with opportunities for alert and well-trained professionals and team members to identify and offer support to trafficking victims. Despite these numbers, one 2012 study found that only 6 percent of health care professionals reported treating a human trafficking survivor during their career⁹⁴ and **57 percent of survivors on Polaris’s survey reported never being asked trafficking or abuse assessment questions during any health care visit.**

Clearly there is work to be done, but there are also extremely encouraging signs of progress in the form of a massive uptick in signals from health care professionals to the National Human Trafficking Hotline.

In the 2017 article Training US Health Care Professionals on Human Trafficking: Where do we go from here?, researchers analyzed health care professional (HCP) call data from the National Hotline through 2015 and found that between 2012-2014, calls from health care professionals had significantly increased by 71.29 percent, which was higher than the general increase in calls and indicated greater awareness and behavior change in this field.⁹⁵ Polaris similarly replicated the statistical analysis with updated data through 2017 and found even more exciting trends. From December 7, 2007 - December 31, 2017, health care professionals con-

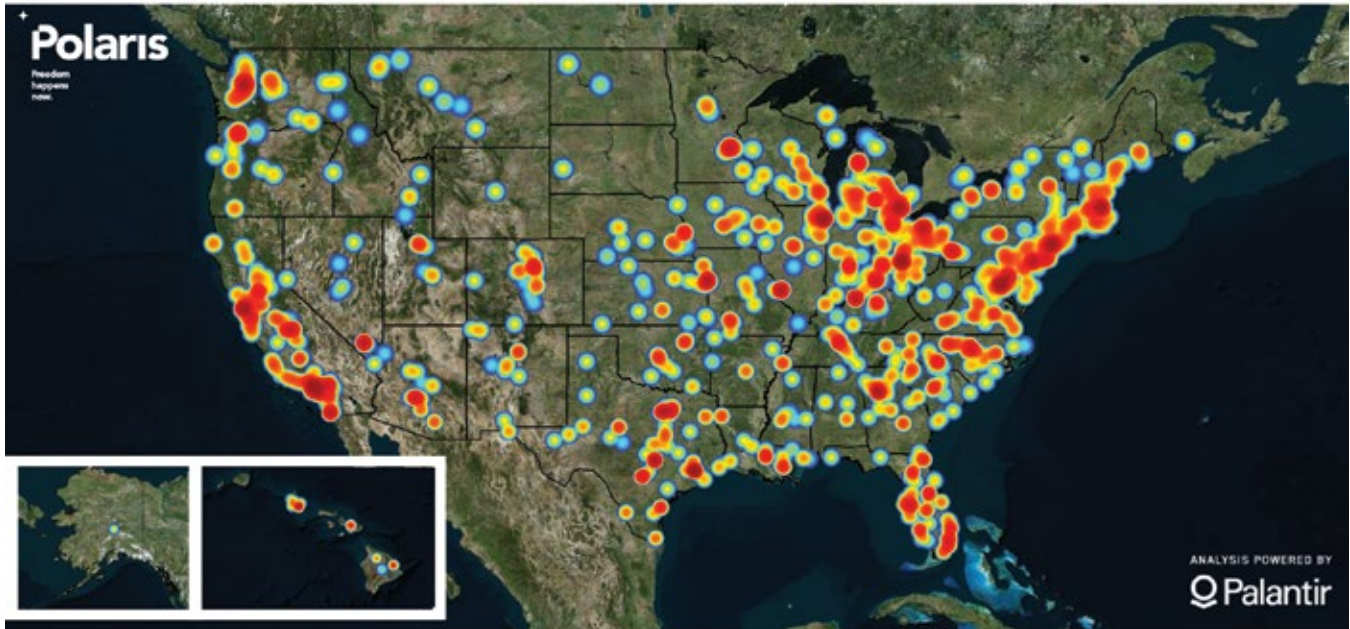
tacted the National Hotline about a potential human trafficking situation 2,109 times, ranking them as the 7th most frequent signaler type among the National Hotline’s list of 30 possible signaler types.⁹⁶ While the total number of human trafficking related signals to the National Hotline increased by 54 percent from 2014-2017, **the percentage increase of trafficking related signals from health care professionals during that time was a staggering 171 percent** (See Figure 6.0).

Figure 6.0:
Human Trafficking Related Signals on National Human Trafficking Hotline: Total vs. HCPs
December 7, 2007 - December 31, 2017



This documented increase in health care professional signals is by no means limited to one region of the U.S. as Figure 6.1 shows.

Figure 6.1: Locations of Health Care Professionals who've Contacted the National Human Trafficking Hotline December 7, 2007 - December 31, 2017



Health care professionals aren't just calling the Hotline at significantly increased rates, they're also proactively seeking education and resources to become better equipped in identifying and responding to potential trafficking victims in their care. In 2014, the National Hotline's online training resource, [Recognizing and Responding to Human Trafficking in a Healthcare Context](#), was viewed 340 times. In 2017, the same training resource was viewed an overwhelming 15,838 times. While some of this online traffic can be attributed to an upgrade to the Hotline's website and a general increase in visitors, there is a disproportionate increase in accessing this particular resource. In 2014, it was the 12th most-viewed resource on the Hotline's website, and in 2017, it was the 2nd most viewed.

Increased calls to the Hotline during that timeframe may also correlate with the expansion of targeted training for health care professionals from the U.S. Department of Health and Human Services (HHS). In 2014, HHS piloted the SOAR to Health and Wellness training for health care professionals. The training program has expanded in each subsequent year and is currently available online and in-person from the HHS Office on Trafficking in Persons (OTIP) through the National Human Trafficking Training and Technical Assistance Center (NHTTAC) with accreditation from the Postgraduate Institute of Medicine. The training equips practitioners, organizations, and communities to identify trafficking victims, offer trauma-informed and culturally appropriate care, and implement proper protocols and procedures for referring victims and survivors to appropriate services, including contacting the national Hotline.⁹⁷ Now health care and social service professionals of all disciplines can log on and complete the [SOAR Online](#) training modules and become an anti-trafficking change-maker in their office or health system.

Over 14 medical societies have created policies on trafficking⁹⁸ and a number of states have mandated education and training for health professionals on human trafficking.⁹⁹ For example, New York State requires all hospitals to have protocols on trafficking victim identification, assessment, and treatment in place.¹⁰⁰ With these dedicated professionals leading the way, along with the arsenal of knowledge that specialized trainings like the SOAR to Health & Wellness training can offer, there is confidence that the tides are indeed shifting in the health care industry, making the future more hopeful for trafficking survivors.



INDUSTRY SPOTLIGHT: HEAL Trafficking

HEAL Trafficking (HEAL) is a group of over 2000 multidisciplinary professionals, many in the health care industry, who are trailblazers when it comes to working to end human trafficking and supporting survivors using a public health, prevention-based perspective.

HEAL is a leading resource for anyone in the health care industry or related professions who want to connect and learn from other experts and stay updated on current trends, action items, latest research, trainings, and best practices. HEAL, through the leadership of their Executive Director and co-founder, Dr. Hanni Stoklosa, tirelessly focus on policy advocacy, enhancing clinical care by connecting practitioners, ensuring education and training resources are accessible to all, using media and technology, and elevating best practices in protocol development and cutting edge research, with committees dedicated to each.

Dr. Stoklosa and HEAL have been instrumental in shifting, not only the health care industry's perspectives on treating and preventing trafficking, but have also lent their expertise to policy makers, government initiatives, and the anti-trafficking field at large. HEAL's experts have been integral in the HHS SOAR National Technical Working Group, the Institute of Medicine's consensus report on Commercial Sexual Exploitation and Sex Trafficking of Children in the United States, and the United Nation's Alliance 8.7 Knowledge Platform. HEAL's Protocol Toolkit, a manual for health systems in developing plans for human trafficking response, has been downloaded over 1300 times in over 24 countries.

If you're a professional interested in learning more about fighting human trafficking from a public health perspective, please visit HEAL's website, www.healtrafficking.org and join the network, or email info@healtrafficking.org.

How Health Care, Health Conditions, and Disabilities may be used in Recruitment

A farm worker accepts a fraudulent job far from home because he is desperate to save money for a child's surgery. A woman stays with her abusive husband who sells her for sex because she relies on his health insurance to cover treatment for chronic pain. While the health care service and the disability service systems rarely serve as direct pipelines for recruitment into a human trafficking situation, stories like these reported to the National Hotline show how clearly health and disability-related needs can serve as an indirect recruitment tool for human traffickers.

Health Conditions and Disabilities as Vulnerabilities to Trafficking

Traffickers prey on people with chronic health concerns, exploiting the sense of isolation, the fears, the insecurities, and a perceived lack of options that are too often a part of growing up with and living with disabilities.

On the National Hotline, between January 2015 - December 2017, a total of 2,116 potential victims were recorded as having a pre-existing health concern including a possible physical disability, mental health diagnosis, substance use concern, or intellectual/developmental disability, either prior to or at the start of their recruitment into trafficking. Figure 6.2-6.4 breaks down the non-cumulative Hotline data within each form of human trafficking.

Figure 6.2: Pre-existing Health Concerns of Sex Trafficking Victims

National Hotline: January 1, 2015 - December 31, 2017

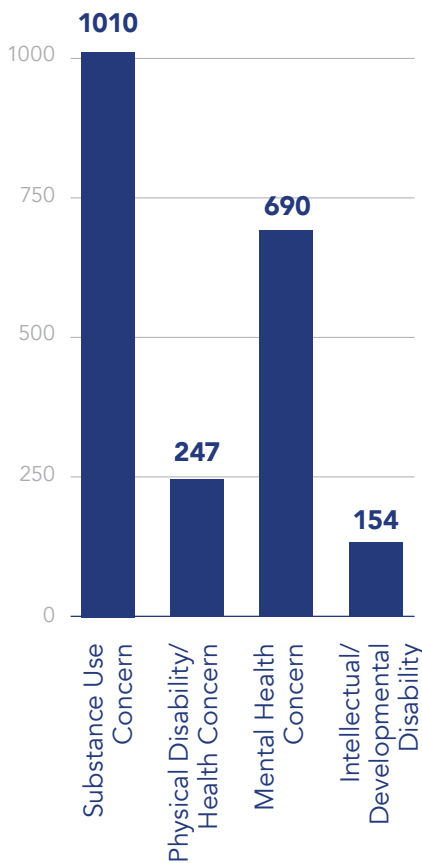


Figure 6.3: Pre-existing Health Concerns of Labor Trafficking Victims

National Hotline: January 1, 2015 - December 31, 2017

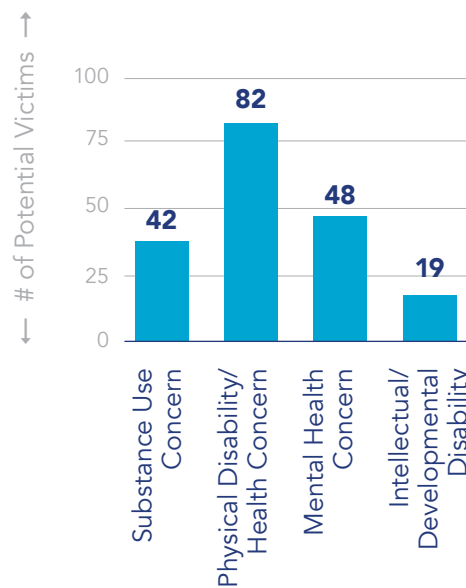


Figure 6.4: Pre-existing Health Concerns of Sex & Labor Trafficking Victims

National Hotline: January 1, 2015 - December 31, 2017



Data is non-cumulative. Individuals can have multiple health concerns. Please note the differing axis scales on each graph. These statistics do not include potential victims on cases where the form of trafficking was not identified to the hotline. Data from January 1, 2015 - December 31, 2017.

One sex trafficking survivor from a Polaris focus group explained how her trafficker leveraged her disability against her:

"I was born disabled and that is what led me to be vulnerable to being trafficked.... [My trafficker] played on that fear that my parents [instilled in me] that I couldn't hold down a real job or support myself. Like this is the only thing I'll ever amount to."

Similarly, the National Hotline managed one case of potential sex trafficking where an adult potential victim with a developmental disability was recruited at a local recreation and vocational training center. The potential trafficker, who eventually posed as a prospective boyfriend, made her believe that her counselors, caregivers, and parents didn't care about her and wanted to keep treating her as a child. He used her fear of being infantilized against her by claiming he was the only one who wanted to see her live independently and make money as an adult. She believed him and, according to the call, he further coerced her into commercial sex out of their shared home.

Individuals with disabilities also face prejudice and social discrimination, which can make it harder for them to leave an unsafe situation. Traffickers use these negative social attitudes to their advantage when they target potential victims with disabilities, knowing that authorities are less likely to believe such victims - particularly if the disability impacts intellectual, cognitive, or communication functions, or involves mental health diagnoses. The National Hotline has unfortunately heard of this first hand when potential victims have attempted to report to law enforcement, child protective services, or even their trusted friends and family, only to be met with disbelief or skepticism based solely on their mental capacity or a functional impairment. It is only when the National Hotline or another accredited service provider adds to their voice that the potential victim's circumstances are finally taken more seriously.

Traffickers will also specifically target individuals with a disability in order to gain access to their government benefits. In fact, according to the Human Trafficking Legal Center and National Hotline cases, some traffickers have been known to scout out local government social service buildings looking for people who receive disability income to target.¹⁰¹

One recent example of Social Security benefit theft involved S.E., the victim in the 2014 federal criminal case of U.S. v. Callahan. S.E. was vulnerable due to her cognitive disability caused by a traumatic brain injury when she was a teenager, and the fact that she was homeless and desperate for help to care for herself and her small child. Prosecutors presented evidence that the traffickers forced her to care for their home and their many pets from morning until night, locked her and her child in an unfinished basement, and subjected her and the child to unimaginable physical, sexual, and emotional torture.¹⁰²

Traffickers Offering Therapeutic or Residential Care

The National Hotline has documented cases of labor trafficking situations which begin with potential victims entering what they are led to believe are legitimate therapeutic group homes, but in fact the residents who live there are allegedly used for their unpaid and exploited labor. On the Hotline it has been revealed that some facilities may get local courts or health systems to unwittingly appoint vulnerable individuals to their care as an alternative to state institutionalization. Once housed, these potentially unscrupulous facilities then put the residents to work - in agriculture, retail, landscaping, peddling and begging, and/or extremely laborious domestic work according to a few cases from the Hotline.

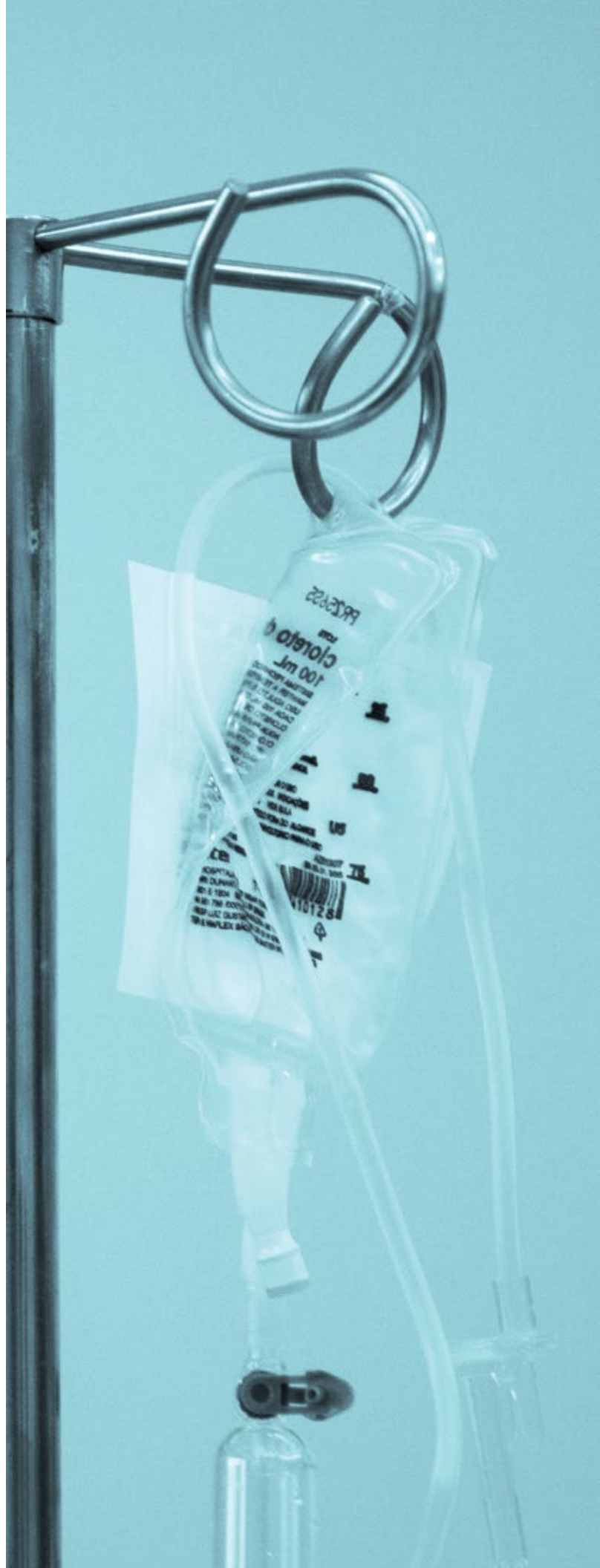
Similar circumstances were present in the 2013 landmark disability discrimination case filed by the Equal Employment Opportunity Commission (EEOC) against Henry's Turkey Service. According to at least one investigative article, the potential victims were transported decades earlier from Texas to Iowa, allegedly to provide them with employment opportunities.¹⁰³ In this case, the EEOC presented evidence that dozens of adult men with intellectual disabilities lived in deplorable and sub-human conditions in Atalissa, Iowa. According to the EEOC, potential victims were exploited for their labor in a turkey evisceration plant, all while being subjected to unfathomable abuse such as verbal degradation, physical abuse and punishment, restricted movement, sickening and unsanitary working conditions, and neglect such as a lack of health care and severe malnourishment. Moreover, the EEOC noted that the men were paid about \$65 a month, regardless of how many excessive

hours they worked, after deductions for their dilapidated dormitory housing and limited food. This exploitation went unchecked for decades and many of the men spent most of their adult lives in the worst forms of servitude. The case ended with a jury awarding the largest monetary verdict in the EEOC's history.¹⁰⁴ Because of their intellectual disabilities and lack of social connections with family, these men were unaware of their rights as workers and human beings. Like many exploiters, the company preyed and profited off the men's conditions and lack of options, all under the guise of providing the individuals with a community and services.

Another example along these lines is the 2009 federal criminal case of *U.S. v. Kaufman*, in which the Kaufmans, a social worker and a registered nurse, ran an unlicensed residential care facility for individuals living with mental illness and developmental delays for almost 20 years, according to court documents. The prosecution presented evidence that victims were forced to perform farmwork in the nude and film pornographic films for the personal use of the traffickers. Worse still, the defendants actually claimed the abuse constituted legitimate psychotherapy for which the Kaufmans billed Medicare and the victim's families.¹⁰⁵

For more information on human trafficking recruitment involving individuals with disabilities, please visit the following outstanding resources:

- [The National Human Trafficking & Disabilities Working Group](#) (A multi-organizational effort managed by the International Organization of Adolescents)
- [Trafficking of Persons with Disabilities in the United States Factsheet](#). (Human Trafficking Legal Center).
- [How to Identify and Communicate with Human Trafficking Victims with an Intellectual and/or Developmental Disability Webinar](#). (Office for Victims of Crime and Technical Assistance Center).
- [Human Trafficking and Health Care Providers: Lessons Learned from Federal Criminal Indictments and Civil Cases](#) (HEAL Trafficking and Human Trafficking Legal Center)
- [Human Trafficking of People with Disabilities Online Resources](#). (Disability Justice).
- [Victims with Physical, Cognitive, or Emotional Disabilities](#) (Office for Victims of Crime and Technical Assistance Center).



Substance Use & Recruitment

As opioid addiction tears through this country, destroying individual families and cutting swaths of destruction through entire communities, Americans are slowly beginning to see substance use disorder for what it truly is - a disease - not a crime. While this is a shift in thinking for officials making public policy, human traffickers have long recognized that because of the brain changes of addiction, substance use can potentially make someone more vulnerable to exploitation.

Since January 2015, the National Hotline has learned of 1,133 individual potential victims who have engaged in substance use prior to their trafficking situation and which may have played a role in their entry into trafficking. However, because this information is not always revealed during National Hotline calls, the numbers are likely even greater.

While the link between sex trafficking and substance use is the more widely understood, National Hotline data shows that substance use has been identified as a risk factor in types of labor trafficking such as domestic work, traveling sales crews, begging and peddling, illicit activities in drug selling, smuggling, or production, and small scale construction jobs.

What ties these together is vulnerability -- individuals are desperate for income and sometimes have a criminal record associated with their substance use that makes it difficult for them to land and keep a mainstream, legitimate job. Traffickers often leverage these barriers and potential victims' desperation by offering fraudulent job opportunities.

Besides a job offer, traffickers of victims with substance use issues are also known to pose as benefactors offering to help these individuals by offering free/low-cost housing, a supply of drugs, settling a previous drug debt, or offering recovery from substances.

In many cases reported to the National Hotline, the trafficker starts out as the drug dealer. The shift comes when the dealer potentially coerces the victim into commercial sex or various forms of labor to satisfy a drug debt - or to earn further substances. Potential vic-

tims on the National Hotline have described how they can feel at the mercy of these dealers because they are terrified of possible consequences, including physical assault, painful withdrawal, or facing past trauma without the dulling effect of drugs.

In other scenarios, an intimate partner with a substance use disorder of their own becomes the trafficker in order to support his or her addiction.

The National Hotline has also received numerous cases of well-intentioned drug courts, drug diversion programs, and drug rehabs unknowingly facilitating some victim's recruitment into less-than-legitimate recovery homes. Much like the so-called therapeutic residential group homes described previously, individuals struggling with addiction that find themselves in the criminal justice system may be appointed to drug recovery programs or transitional recovery housing as an alternative to jail time. Struggling residents that have reached the National Hotline, think they are being given a redeeming chance at a healthy life coupled with supportive housing. Instead, these individuals report being forced to spend their days, not searching for legitimate jobs, repairing their familial relationships, or pursuing mental health counseling, but potentially in grueling labor.

Potential victims in these unscrupulous programs often report not being paid in addition to working excessive hours, being verbally abused and humiliated, threatened with jail time or homelessness, and even induced with the very substances they are attempting to recover from in order to force their compliance. Because these victims are typically not thought of as anything more than "addicts" or "manipulators," they are often not believed if they choose to speak up. Subsequently, the referring court systems or drug rehabs that helped appoint them to these potentially exploitative facilities often have no idea this conduct is occurring on site.

Similar circumstances were allegedly present in recent lawsuits in Arkansas and Oklahoma. According to court documents, two drug rehabilitation programs may have forced their clients, many of whom were appointed to their care by local drug courts, to work in a chicken processing plant and at a plastics manufacturing facility. The plants were allegedly owned and operated by

the same individuals who operated the rehab. Potential victims have stated that instead of being provided with substance use disorder treatment, they were required to work in the plants for no pay and under constant threat of imprisonment if they refused. The cases are still pending, as potential victims are seeking unpaid wages.^{106,107}

Another trend present on the National Hotline is in the context of familial-based sex trafficking. In these cases, caregivers or parents struggling with substance use will begin trafficking their young children for sex in order to fund their addiction. The National Hotline typically hears of these potential cases occurring within the family's private residence. In addition to data from the Hotline, in a 2015 study of 142 anti-trafficking service providers in Kentucky, parental substance use was a vulnerability factor in 29.4 percent of sex trafficking cases across all areas of the state. In about 63 percent of these cases, the trafficker was a family member.¹⁰⁸

Recruitment at Health Care Facilities

The National Hotline has also learned of recruitment happening on site or within drug rehabilitation centers and behavioral and mental health centers, although more research and data is needed. Since January 2015, the National Hotline has learned of 105 potential victims of human trafficking that were recruited at such facilities, mostly leading to potential sex trafficking situations. Potential traffickers may monitor the immediate surroundings of these facilities looking for potential targets, but more often National Hotline cases have indicated the recruiter may be a fellow patient. Some callers on Hotline have explained that individual sex traffickers will sometimes send other potential victims into these clinics with the express purpose of luring new victims who may be questioning their decision to continue treatment.



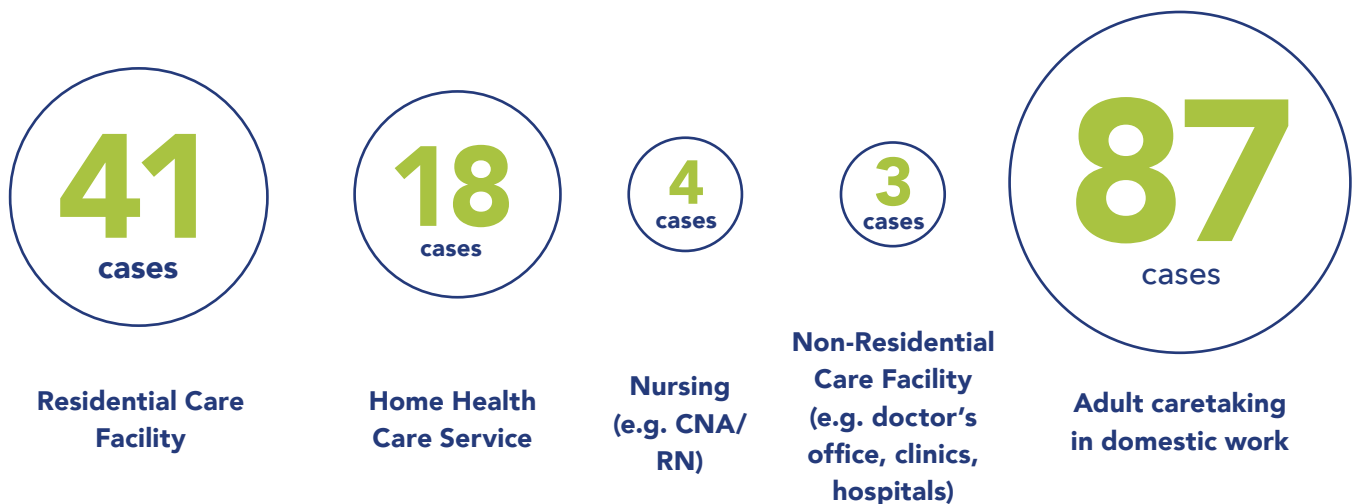
How Health Care and Substances may be used in Trafficking Operations

Labor Trafficking in Health Care Industry

Labor trafficking victims are found not only among health care clients and patients but also among workers in the health care industry. Since the 2007 inception of the National Hotline, a total of 64 potential labor trafficking cases have been documented, with 53 additional cases of potential labor exploitation involving health care workers. According to this Hotline data, potential labor trafficking victims in the health care industry are primarily found in nursing homes and as home health aides and are typically employed by health care staffing agencies. Nearly a third of the potential trafficking and labor exploitation victims reported in health care industry Hotline cases since January 2015 were women from the Philippines.

According to Hotline data, potential victims are typically recruited into this type of work under guest worker visa programs such as the H-1B, and more rarely H-2B, B-1, and J-1 visas. Like many other industries that rely on migrant labor supported by guest worker visas, workers are promised lucrative wages and career opportunities. Instead, often after paying substantial portions of their income in recruitment fees, potential victims from the Hotline are met with little or no pay, extreme isolation and restricted movements, document confiscation, debt-bondage, excessive working hours, and threats of deportation and blacklisting. However, much like the labor trafficking occurring in the hospitality sector, the obtuse labor supply chains drastically obfuscate who along the recruiter to supervisor spectrum is responsible for a potential victim's abuse.

Figure 6.5: Health Care Roles in Health Care Labor Trafficking



Data is non-cumulative. Cases can involve multiple facilities and services.

The lines between domestic work and in-home health care can be difficult to draw as live-in domestic caregivers can be often expected to provide medical services in their adult caregiving duties without proper training or certification. In addition to the data described above for health care workers, the National Hotline has also recorded an additional 87 potential cases of labor trafficking involving domestic work in the context of adult caretaking in a private residence. Because of the intersections with home health care and domestic work, it is important to consider both industries. As the Baby Boomer Generation ages and becomes in need of long-term services and supports, an estimated 1,208,800 personal health aides will be needed by 2026.¹⁰⁹ In an industry already fraught with low wages, poor working conditions, gender disparities, and a lack of benefits, this creates a possibility that more exploitation will flourish in this industry in the coming years if serious structural changes are not explored.¹¹⁰ For more information on proposed industry changes for home health care workers, please see [Preparing for the Elder Boom: A Framework for State Solutions](#), a report by Caring Across Generations.

One 2013 example of a federal civil case of potential labor trafficking in the health care industry is *Access Therapies v. Mendoza*, which involved a staffing agency for physical therapists in nursing homes. In this case, college students were allegedly recruited in the Philippines under H-1B visa contracts, either by

Access Therapies' employees or foreign labor recruiters contracted by the company. According to the court documents, upon the potential victim's arrival, they were made to sign new contracts that contradicted and superseded the original contract they were given when applying for their H-1B visa. These new contracts were allegedly in a language potential victims could not understand, drastically reduced their hourly wage, threatened them with a laundry list of possible charges they would be responsible for if they chose to leave, and informed them of a \$20,000 debt for recruitment, visa fees, and training costs. Potential victims in the suit attested that any worker who would contest these "bait and switch" tactics, was threatened with deportation. Potential victims also stated they saw deductions, allegedly counting toward their debt, come out of every paycheck. Court documents claim that these payments were in addition to the payments Access Therapies were allegedly charging the nursing homes for placing each worker, thereby creating a "double profit." This case ended in an undisclosed settlement.¹¹¹

Sex & Labor Trafficking in the Illicit Drug Economy

Although not as direct a link with the health care industry, the business of human trafficking and the illicit drug economy fueling the public health issue of substance use can often go hand-in-hand, according to the data from the National Hotline.

Figure 6.6: Drug-related Illicit Activities: Sex & Labor Trafficking
National Human Trafficking Hotline

Illicit Activities Sub-Type	# of Cases since December 2007	# of Potential Victims identified since January 2015
Drug Selling or Drug Smuggling	181 (61%)	180
Drug Production/Cultivation	21 (7%)	23

*NON-CUMULATIVE

*NON-CUMULATIVE

*Data is non-cumulative. Cases can involve multiple types of illicit activities. In some cases the type of illicit activity is not drug related or is not disclosed or known.

As mentioned before, illicit activities is an entire type of sex and labor trafficking present in the Typology of Modern Slavery that is most commonly centered around potential victims being forced into the labor of drug dealing, drug smuggling, and/or drug production/cultivation. National Hotline data shows that many potential victims are also forced into commercial sex in conjunction with this labor. Since December 2007, the National Hotline has received 194 cases of sex and labor trafficking for the purpose of drug-related illicit activities, which is 65 percent of the total number of trafficking cases involving illicit activities.

This trend has recently been documented among runaway and homeless youth (RHY), specifically in a 2017 study which found that the vast majority (81 percent) of labor trafficked RHYs were forced to sell drugs. The same study found that nearly 7 percent of all RHYs interviewed were forced into the drug trade at some point.¹¹² A young male survivor in the same study, told his story of joining a local gang for personal protection, but soon found himself forced to deal drugs for the gang's profit:

"[It was] fully forced. Because at first, I just wanted to have friends to back me up, you know. A little bit of money in my pocket. But then it got serious to where you do what he says or you'll be hurt."¹¹³

National Hotline data also shows that the illicit activities business model includes unaccompanied foreign minors who have trusted individuals (typically known as "coyotes") who have promised to facilitate their safe passage into the United States across the southern border. Instead, these children, many of whom are often fleeing immense violence from drug cartels in their home countries in Central America, have reported being threatened with death or abandonment unless they agree to carry drugs. Potential victims forced to cultivate illegal marijuana or concoct methamphetamines are also reported to the Hotline. The National Hotline has also learned of potential victims who are intimate partners of drug dealers who are forced to sell drugs as well as provide commercial sex to supplement the trafficker's profits.

Another sub-type of trafficking with a nexus to substance use learned of through the Hotline is residential sex trafficking occurring in private or abandoned residences used informally for drug dealing purposes (a.k.a. "trap houses"). According to potential victims on the Hotline, these makeshift drug distribution homes primarily operate as a central hub for neighborhood drug dealers to manage their businesses, but can potentially involve women and runaway and homeless youth being forced or coerced into commercial sex by their drug dealer affiliates or intimate partners.



How Elements of Health Care and Substances may be Used as a Means of Control

“When I did go [to receive medical treatment] [my trafficker] was always right there... He wouldn’t let me talk to the medical people. He answered every question.”

A handful of focus group participants experienced sex trafficking perpetrated by a parent. While a parent accompanying a child during a health care visit may have appeared more normal to health care professionals, at least one focus group participant notes there were still pretty clear signs that something was wrong:

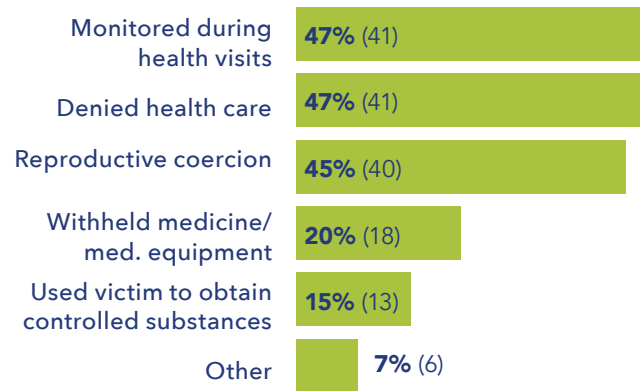
“My bio [father] would often go with me [to the doctor]. He was standing right beside me when they were doing my pelvic exam as a teenager... making sure no conversation would take place. I was fully exposed. That’s a definite red flag.”

Monitoring During Health Care Visits

While many of the survivors who took part in the survey indicated they had access to health care, nearly half of them - **47 percent** - said that they were monitored in some way during their health care visits. In focus groups, survivors recalled their trafficker being present in the exam rooms, sometimes even answering questions or otherwise speaking for the patient. If the trafficker wasn’t monitoring, a “bottom” (a term some pimps use to refer to a victim still under their control but has “earned” a higher ranking among the other victims), was sent to keep watch and report back. One focus group participant explained how her trafficker didn’t need to be directly with her. His intimidation from the parking lot served the same purpose:

“He or one of the girls sat in the parking lot and watched me go in and I better as hell be coming out. I went in alone and went out [alone]. There were cameras in the hospital [that he could access] is what I was told.”

Figure 6.7: Health Care Used as a Means of Control
Polaris Survivor Survey (n=88)



While clearly there are far too many cases where this monitoring is not recognized, many of the 2,109 trafficking-related signals the National Hotline has received from health care professionals since December 2007 resulted from medical facility staff noticing disquieting monitoring behavior from potential controllers. Some commonly reported behaviors from potential controllers are insisting on being present at all times during the health care visit, holding the patient’s ID or documents, filling out paperwork without consulting the patient, or claiming they are related to the patient, but

not knowing critical details about their medical history or identity. Potential victims may also defer to their controllers when asked even the most basic questions.

Limiting or Denying Health Care

While many survivors in the survey reported having access to health care some of the time, **47 percent also indicated that their access to health care was extremely limited or fully denied in other cases**, sometimes despite severe injuries and illnesses. When they were finally allowed to seek medical services, it was often only because the situation was dire enough that it would have prevented them from continuing to work or provide commercial sex. One survivor of labor trafficking explained how the physical and mental exhaustion led to him finally being permitted to access emergency medical care:

"Sometimes I had physical [symptoms] when I was mentally tortured. I didn't know [if] it was from the stress or something [else]... I wanted to go to the hospital, but my trafficker would not allow me to go... When I fainted, I [had] worked continuously for 14 or 15 days... Then one of my colleagues made sure I got to the hospital... [It was a] panic attack. I knew this word later on."

The experience of survey respondents and focus group participants mirrors that of potential victims documented on the National Hotline. Since January 2015, the Hotline has learned of 351 potential victims who were restricted from adequate medical care as an intentional method of control designed to keep them complicit. However, it is believed this number could be even greater, since this information is not consistently disclosed during all Hotline interactions.

This restricted medical care isn't always limited to health care visits, but often includes withholding medications until the victim complies with their traffickers' orders. This includes transgender potential victims who may have their gender affirming hormone therapy medications withheld by their traffickers. This serves as an additional layer of abuse since removal of these medications often affects their physical gender expression which can have serious implications on their safety if their gender expression does not match their stated gender identity.

Substances Used as a Means of Control

Substances may be used as an effective means of control in both sex and labor trafficking situations, according to Hotline interactions. Traffickers may escalate a potential victim's existing substance use by constantly supplying them with an ever increasing supply of drugs, thereby increasing their dependence on their trafficker. Hotline callers have also revealed that potential traffickers may instigate a new addiction, either by forcefully inducing illicit substances to incapacitate a potential victim into compliance, or more commonly, subtly manipulating a potential victim into an addiction.

"He introduced me to heroin and he used me. Once I became addicted to heroin, that was his form of controlling me and intimidating me and making me believe that there was no way out, and in a sense that I was responsible for my own addiction and that I was responsible for his."

Audrey Morrissey, Survivor & Associate Director of My Life My Choice, Boston, MA¹⁴

The tactic of addiction facilitation is used in the context of intimate partner-based sex trafficking, and can be coupled with intense trauma bonding, similar to “Stockholm Syndrome,” which unite the couple under the guise of shared adversity, danger, and/or fear. A trafficker often manipulates the victim’s devotion and facilitates an addiction by framing it as a way to grow closer, have fun, or escape reality together. This mutual dependency only strengthens a victim’s attachment to a significant other, making it harder to leave or discontinue the commercial sex.

Since January 2015, the National Hotline has learned of **2,853 potential victims (or 12 percent of all potential victims identified during this time) who had drugs or alcohol used against them during their potential trafficking situation.** The vast majority (88 percent) were potential sex trafficking victims. Research on the role of substances in human trafficking situations notes similar patterns. For example, in the same 2015 Kentucky study referenced previously, nearly 24 percent of victims were controlled with illicit substances.¹¹⁵

The federal criminal case of U.S. v. Fields portrays this tactic the most clearly. According to a Department of Justice press release, Andrew Blane Fields targeted women and girls with existing substance use issues, and calibrated the victims’ supply of addictive prescription opioids like Oxycontin and Dilaudid in such a way as to intensify their addiction. The press release explained that Fields would methodically control their supply of these addictive drugs so that when they were at the breaking point of withdrawal symptoms, he would only give them relief if they continued providing commercial sex out of strip clubs for his financial benefit. According to the Department of Justice, “One of the victims testified that Fields, while watching her suffer through the onset of the excruciating physical and psychological withdrawal symptoms, would compel her to serve another prostitution client by saying, “I’ll give you one pill. I’m not going to give you another until you get up and go to work. And you know you need another.”¹¹⁶

In a labor trafficking example, this time in a prosecuted agricultural case in Florida, court documents show that Ronald Evans recruited homeless men at soup kitchens and shelters and provided them with crack cocaine to not only control them and make them dependent, but to accrue an increasing drug debt the victims would have to continue working to pay off.¹¹⁷

Reproductive Coercion

Reproductive coercion is a form of abuse that typically involve an abusive intimate partner attempting to control or interfere with their partner’s reproductive health and pregnancy outcomes.¹¹⁸ Specifics might include barring victims from using condoms or denying access or mandating birth control despite the victim’s preferences. Reproductive coercion is a common thread in the experience of sex trafficking victims and domestic violence victims. Forty-five percent of those who answered the Polaris survey asserted that their trafficker used behaviors to control or interfere with their reproductive health.

In one qualitative study of sex trafficking survivors in the U.S., conducted by Dr. Anita Ravi, one female survivor explained:

“...that’s my first STD – I caught an STD from a pimp... that was his choice not to use a condom. He told me that I couldn’t use a condom with him, but I had to use it with the johns.”¹¹⁹

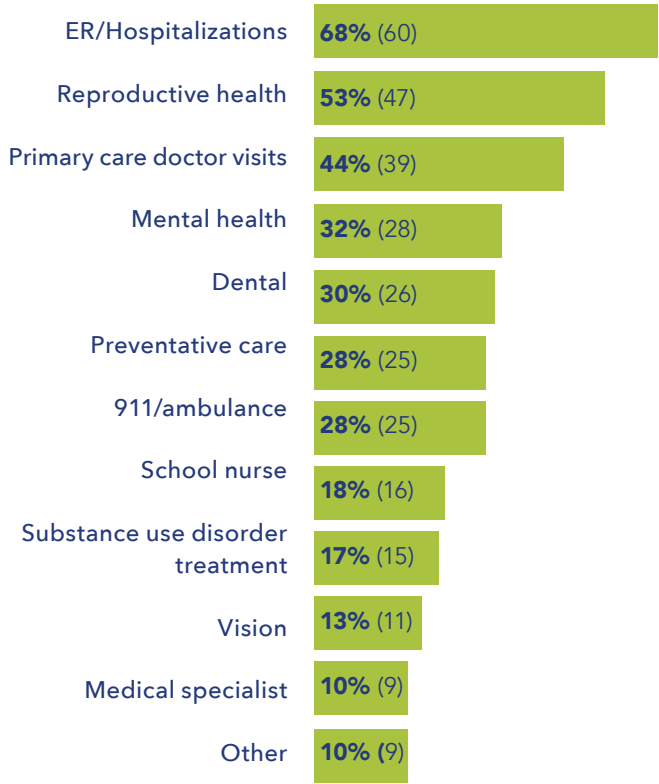
The 2013 federally prosecuted case of U.S. v. Weston is a profound example of reproductive coercion in an attempt to facilitate pregnancy in victims. In this case, prosecutors presented evidence that defendants targeted at least six individuals with developmental disabilities. Defendants not only stole victims’ Social Security benefits, but forced some victims into commercial sex and personal sexual servitude with each other for the express purpose of conceiving children in order to obtain additional government benefits. Court documents show that one victim gave birth three times.¹²⁰

How Victims & Survivors may Use & Experience Health Care

The comparative frequency with which individuals who are actively being trafficked have access to the health care system suggests that this is where increased education and meaningful interventions can be made. Testimonies from our Polaris focus groups attest to these opportunities - albeit most of them opportunities that were tragically lost. As noted in previous sections, the majority of focus group participants experienced their trafficking situations at a time in the not too distant past when health care professionals were less educated about the complexities of interpersonal violence. Those

negative experiences are reflected here. They are real but they may not necessarily mirror the experience of victims engaging with health care systems today. Respondents also acutely felt the effects of the social stigma attached to their involvement in the sex industry. But there is hope that can improve with changing cultural attitudes. By sharing their painful experiences, in this report and in other contexts, these survivors are helping to move change forward and continue to address the difficulties that remain in accessing health care in America for many who live in the margins of society - and indeed for many who simply can't afford care, or don't know how to access the help that is available to them.

Figure 6.8: Types of Health Services Accessed by Victims During their Trafficking
Polaris Survivor Survey (n=88)



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

The solution then is multifaceted. Health care professionals can make an enormous difference by understanding and remaining alert for indicators of trafficking in their patients, but systems must be put in place to ensure that survivors are not just recognized and well-treated, but treated with dignity and provided with the continuum of health services and support they need to find and maintain freedom.

“I was only able to see [health care providers] on [a] dire emergency basis. [Even] when I had broken bones, and I’ve had 85 broken bones that were documented, many more that were never documented because I couldn't go.”

Survivor Use of Emergency Medicine

Emergency Departments (EDs) were the most common venue for medical care reported by survivors who responded to Polaris's survey. Although a surprising number of survey respondents (44 percent) reported also interacting with primary care or other infrequent doctor visits, a prevailing 68 percent of survivors stated they interacted with EDs and hospitals during their trafficking.

The National Hotline has heard of potential victims of sex and labor trafficking presenting at EDs with any number of pressing medical issues directly related to their potential trafficking experience such as serious injuries from physical assault, trauma-related mental health issues, symptoms of malnourishment, advanced infections from a lack of medical care and/or poor hygiene, severe workplace injuries (see Injuries & Illnesses in Labor Trafficking and Labor Exploitation), or drug overdoses (see Substances Used as Coping Mechanisms). The Polaris focus groups also revealed that sex trafficking survivors sought forensic exams at EDs for instances of sexual assaults.

Additionally, there are many Hotline cases that have involved potential victims seeking emergency medical care for an injury or illness potentially unrelated to the trafficking such as appendicitis, flu, heart concerns, or complications with pre-existing health issues.

"The only time I was ever admitted to the hospital, I had a UTI that got so bad that I had some type of E-Coli strain. So I was actually like two days away from kidney failure by the time I went in."

"After I escaped I... went with law enforcement to... the ER. The treatment at the ER wasn't what I expected. It's not respecting us as human being[s]. The judgement. That you are a 'street girl.'"

Restriction and control of medical access, coupled with a potential lack of access to regular preventative care, means minor infections or illnesses are often left untreated until they become an acute or emergency situation. Therefore, this delay of care or unusual advancement of injury or illness, is a red flag that may indicate human trafficking. One survivor from a Polaris focus group offers a case-in-point experience.

"[After a cesarean section delivery] They put in staples... Those staples are supposed to stay in for 4-5 days and then you take them out and the sutures heal. I got pregnant right again afterwards. I was locked in an apartment for the entire time. When I went into labor I went to the hospital and I still had staples in me and I was toxic from it... I just feel like somebody should have noticed at that point and taken me aside [and asked] 'what is really going on?'"

Potential victims may also present at hospitals with one ailment or illness, but discover a whole host of unrelated, yet untreated and undiagnosed conditions. Another labor trafficking survivor explained how she was denied medical care and subsequently learned of other untreated illnesses:

“When I was with my previous employer, I was [doing a repair] and I fell down... and got a broken tailbone. When I told her not to [make me] work, she told me to work for three days more. And then, when I told her, “Ma’am, I cannot really do it,” she told me “no, you need to work.” Then I filed [for] work[er’s] compensation... Then, luckily there was work[er’s] comp for us employees. And I went to the hospital and they treated me. That’s where I found out that I was having high blood pressure [and] had diabetes.”

A female survivor of domestic work in a Polaris focus group offered a similarly disturbing story. She had grown extremely ill and experienced dramatic weight loss that she attributed to overwork, lack of food, and emotional distress. For several weeks, her symptoms grew worse as her trafficker refused her medical care. When the survivor was finally permitted to see a doctor friend of the trafficker, she disclosed her daily conditions out of desperation. Despite the doctor initially offering to help the victim leave her situation, he had an unexplained change of heart and instead betrayed the victim’s confidence by telling the trafficker what the victim had disclosed. Then he simply prescribed medication to help her gain weight and sent her right back to the harmful conditions. Upon escape from her trafficker’s home, she was hospitalized and eventually diagnosed with life-altering diseases, malnourishment, and depression, all of which went undiagnosed and untreated during her time working for her trafficker, and which required subsequent hospitalizations.

Another indicator of human trafficking that may be evident in emergency medicine is if the potential victim unexpectedly leaves, refuses care, or is removed from the hospital against medical advice.¹²¹ One survivor at a Polaris focus group elaborated on two separate instances:

“[The doctor] said “yeah, well you’ve got double pneumonia and you’ve coughed so hard you’ve torn the cartilage from your breast bone. And we need to admit you”. I said “no, just give me an antibiotic I’ve got to go back to work.” So, that’s what they did.”

“I was in the hospital for a female surgery... I had the surgery and one of my regulars called. And I actually had to take out the IVs and leave the hospital go visit my regular, collect that money, and my pimp was waiting for the money in the room when I got back. They had to hook me back up to everything and I ended up staying for another 3-4 days. Nobody ever asked, “Where did you go? [and] Why?” I went and had sex and I had just had female surgery.”

It is crucial for health care professionals to assess why a patient may feel compelled to leave or intentionally not follow the course of recommended care. A potential trafficker could be behind the scenes, using debt, threats, manipulation, and coercion to pressure the victim to return to work quickly. In some cases revealed in the Polaris focus groups, sex traffickers may not allow victims to use prescribed pain medication because it may impede their ability to remain conscious for buyers.

Human Trafficking Indicators in Health Care Settings

Because of the intimate and confidential nature of health care visits, there are certain indicators that might be apparent to health care professionals that would not be present in other situations. Moreover, indicators can be witnessed by professionals at all levels of the health care facility such as receptionists or administrative professionals, nurses, medical technicians, social workers, mid-level providers, or physicians. The following lists of indicators, compiled in combination from SOAR

Online and Polaris, are meant as a guide to identify patients potentially at-risk for human trafficking. Each individual indicator should be taken in context, not be considered in isolation, nor should be taken as “proof” that human trafficking is occurring. Additionally, cultural differences should also be considered. Of course, proper assessments and screening tools should always be used to supplement these indicators (See Industry Recommendations & Opportunities for screening tools).

Physical Indicators	Behavioral Indicators	Environmental Indicators
<ul style="list-style-type: none"> • Delayed care or an unexplained progression of an illness or injury • Physical impacts of long-term trauma • Workplace injuries, especially from a high-risk industry identified in the Typology of Modern Slavery • Bruising or burns in various stages of healing • Unprotected exposure to toxic chemicals • Physical and sexual abuse • Respiratory issues • Communicable and non-communicable diseases (e.g. TB, hepatitis) • Malnourishment • Poor hygiene • Substance use • Significant dental issues • Suspicious tattoos or evidence of branding that may indicate ownership • High number of sexual partners • Multiple pregnancies/abortions • Frequent testing or treatment for STIs 	<ul style="list-style-type: none"> • Leaving against medical advice or refusing care • Shares scripted, confusing or inconsistent stories • Is unwilling or hesitant to answer questions about the injury or illness • Protects the person who hurt them or minimizes abuse • Overly fearful or nervous behavior, lacks eye contact • Is resistant to assistance or demonstrates hostile behavior • Inability to focus or concentrate • Unaware of location, date/time • Symptoms associated with Post-Traumatic Stress Disorder • Depression and anxiety symptoms • Patient defers to their accompanying person before answering questions • Suicidal ideation or suicide attempts 	<ul style="list-style-type: none"> • Patient accompanied by another individual who may monitor them, speak for them, and/or insist on being present at all times during health visit • Accompanying person has possession of patient’s documents and/or money • Accompanying person attempts to fill out paperwork without consulting the patient • Accompanying person claims to be related to the patient but does not know critical details about their medical history or identity • Accompanying person exhibits physically aggressive or controlling behavior toward patient • Patient lives at work or in overcrowded conditions • Patient lacks a fixed address • Fragmented, missing, or inconsistent health records



Above all, in every single focus group, survivors told story after story depicting their overwhelmingly negative, demoralizing, and often traumatic experiences with emergency health professionals. The concerning treatment often went beyond health care professionals simply not recognizing signs, or being uninformed or lacking context about the nuances of trafficking or complex trauma. In the vast majority of instances, survivors at Polaris focus groups attributed these poor interactions to the unconscious stigma or implicit bias held against individuals engaged in the sex industry. One survivor detailed her experiences:

"I had frequent contact with health care workers, just through different incidents from becoming injured. I was beat up in a hotel room so I went to a hospital. My cheekbone was fractured and the nurse was just awful to me, treated me less than human. It was because of the [commercial sex] lifestyle, that was the thing. So instead of receiving compassionate care, they didn't even give me pain medication. It was just about getting me out of their hospital."

Survivors consistently reported disheartening interactions ranging from a dismissal of their pain or symptoms, snide or insensitive comments or questions, to more overt harassing behavior such as victim blaming, or even abuse by emergency health professionals.

"I did [go to the hospital] one time because I was pretty beat up....I sat there for 6 hours and the nurses... they were talking back there and looking at me, and [saying] "You know, well she looks like she deserved it."

Although these experiences may very well be indicative of a time period before victim blaming behavior was more widely challenged and brought into collective consciousness, this reveals the importance of equipping emergency health professionals with proper training to recognize and address implicit bias when working with patients from certain communities or demographics.¹²²

Reproductive Health & Sex Trafficking Victims

Beyond emergency health care, the other arena in which potential victims may regularly appear and seek services is in reproductive care. Indeed, **53 percent of Polaris survey respondents and the majority of focus group participants stated that they utilized reproductive health services during their trafficking**, including but not limited to preventative OB/GYN care, prenatal care, childbirth, and other visits to reproductive health clinics. This type of health care was the second most reported in the survey - which is consistent with the fact that 77 percent of the survey sample identified as sex trafficking survivors.

While pregnancy was not a standard question asked in Polaris's survey or focus groups, many females in the sex trafficking focus groups disclosed that they sought at least some prenatal care for pregnancies during their exploitation. This makes obstetrics and gynecology care a particular arena for identification and support as this may be one of the only times a victim could be in regular contact with the same physician, as one survivor in a Polaris interview explained:

"When I was pregnant with my babies that's when I finally went to a regular doctor. But it was just for the babies."

In every focus group where health care was even remotely addressed, sex trafficking survivors explained that they would visit outpatient reproductive health clinics, sometimes monthly, to receive preventative screenings for STIs, HIV, and pregnancy. One focus group survivor explained:

"I went to [outpatient reproductive health clinic] every month to get tested and [to get] birth control. That was really it other than emergency services."

Although this access to health care may have been frequent in nature, the visits may not always be in the same location with the same medical team or health system, which, for a health professional may result in a fragmented view of the patient's health record and more importantly prevent ongoing rapport building.

Survivors in focus groups also revealed that STIs did sometimes occur which led them to outpatient reproductive health clinics to seek treatment.

"I used to go every month to [outpatient reproductive health clinics] [for testing]... They would say, "No, you can't get an HIV test every 30 days." I would just tell them that I have to. I wouldn't necessarily say that I was a sex worker, but that I had multiple partners. But somebody that's getting tested so frequently, that should be a huge red flag."

Because of the social stigma that individuals in the sex industry and sex trafficking survivors can often face in health care settings, many patients may not feel comfortable disclosing to their health care provider that they engage in commercial sex. According to intake statistics by St. James Infirmary, a medical clinic dedicated to providing health care to individuals engaged in the sex industry, 70 percent of their patients never disclosed their sex trade involvement to their other medical providers "for fear of discrimination or diminished health care."¹²³ As mentioned, these fears were a reality expressed by many survivors in Polaris focus groups, including one survivor who did choose to disclose at least once.

"After I was assaulted by [a] trick, I went to [a reproductive health clinic] because I ended up getting gonorrhea from this trick. So in that visit... I found out I was pregnant, and I found out I had all these STDs... I told them "I need help, I'm in a situation I don't want to be in." ...When they hear that I went back [to my trafficker], they're like "you chose that [life]." Really I didn't! I was still... brainwashed. It took many years to deprogram myself."

"I think that posters about sex work or trafficking might serve as an indicator to show that they at least know what that is. But I think the main thing is empathy and just asking the right questions."

One survivor at a Polaris focus group discussed her non-disclosure experience with her regular gynecologist due to a perceived lack of training and understanding:

"I had private insurance when I was trafficked. So I was seeing my gynecologist. I had been seeing him since I was 18 and I wasn't trafficked until I was 21. So he knew me... I was seeing him just about every other week because I had an infection or an STD or something. It got to the point when he would ask me "oh, what do you do for work?" [and I would answer] "I'm a student." [I] could tell he knew but he didn't know how to approach it."

These stories and many like them, not only highlight the ever pressing need for health professionals to be trained in trafficking assessment, but also emphasizes the critical need for implicit bias training, rapport building, trauma-informed care, and the general creation of safe spaces for honesty and voluntary disclosure.

Sex Trafficking as Child Abuse

One issue that the anti-trafficking field is still battling today is the recognition of child sex trafficking as a form of child sex abuse. In 2015, the Justice for Victims of Trafficking Act (JVTA) changed the national definition of child abuse under the Child Abuse Prevention Act of 1990, to include child sex trafficking, and compelled states to change their state/local definitions as well. Despite the progress made with the JVTA and other initiatives bringing domestic minor sex trafficking into consciousness, some health care professionals may still be unaware or reluctant to recognize that anyone under the age of 18 engaged in the commercial sex industry, with or without a controller or "pimp", is indeed a victim of sexual exploitation. They are entitled to the same response and trauma-informed treatment as any other suspected victim of child sexual abuse.

Although perceptions may be shifting, one adult survivor of child sex trafficking in a Polaris focus group revealed the alarming reproductive health concerns her pediatricians failed to identify as something more and the disturbing blame placed on her:

"I had PID [Pelvic Inflammatory Disease] five times as a teenager. I was hospitalized three times. Hospitalized! It was so bad! The first time I was 13. Not once, not once [were any questions asked]. They ambulanced me from the school....I was [viewed as] a sexually promiscuous child. It was [viewed as] my fault."

While it's assumed that this negligence is hopefully less likely to occur in today's culture with recognition of child sex abuse as a mainstream health care priority, this historic lack of training and awareness has unfortunately set the stage for a lifetime of fragile and distrustful relationships between survivors and health care professionals (See Health Care Experiences Post-Trafficking).

Injuries and Illnesses in Labor Trafficking and Labor Exploitation

While serious workplace injuries can of course occur by accident, these risks are often increased due to many factors within the control of exploiters. According to many potential victim accounts from the National Hotline, employers in potential labor trafficking and labor exploitation cases have been documented to have a flagrant disregard for their workers' health and safety, often denying workers appropriate safety equipment, requiring strenuous and excessive working hours, withholding food, water, and sleep, or otherwise exposing workers to preventable hazards. As discussed previously, health concerns may be compounded when victims are prohibited or delayed from accessing appropriate medical care if an illness or injury does occur.

This was the case of Roberto*, a potential victim of labor trafficking in a restaurant reported to the National Hotline. He presented to a local Emergency Department with third-degree oil burns after his employer reportedly forced him to work with his injury for multiple days, causing serious infections to the already severe wounds. When his potential traffickers, the owners of the restaurant, finally took him to the ED they insisted on being present at all times. After vigilant hospital staff successfully separated Roberto from his employers and assessed his situation, Roberto disclosed that he typically works up to 16 hours a day, seven days a week, does not have access to what he earns, and was threatened with deportation if he spoke out. A nurse reported non-identifying details to the National Hotline, who was able to connect the nurse with the local human trafficking task force to develop a safety and service plan for Roberto.

While there are now a wide range of educational resources available for health care professionals to spot red flags of potential sex trafficking, similar resources related to potential labor trafficking are either not available or extremely limited in scope.

Part of the difficulty may be the wide range of potential signs and symptoms, since each industry where potential trafficking and exploitation could occur carry its own unique health and injury risks. Furthermore, funders are less likely to fund initiatives related to labor trafficking.

There are some comparatively common conditions related to agriculture work, for example, such as Green Tobacco Sickness. GTS, as it is referred to in health care settings, is a form of nicotine poisoning that results from handling tobacco leaves without the proper gloves or protective clothing. The nicotine in the tobacco leaves mix with the moisture of water or sweat, allowing the nicotine to pass into the bloodstream more easily.¹²⁴ Symptoms can include intense nausea, vomiting, dizziness, and headaches,¹²⁵ which may bring workers to the ED, or to reach out to the National Hotline for help. Because of this danger, tobacco is the single most reported crop in potential agricultural trafficking cases reported to the National Hotline. Potential victims of labor trafficking and labor exploitation on tobacco fields are particularly at risk for GTS since their exploiters often do not provide workers with proper protective gear such as gloves, masks, or proper safety training, according to Hotline accounts. Although the symptoms are said to pass within 24 hours after handling the leaves, because agricultural workers are handling these plants all day every day, and are sometimes not educated on the cause and risks of GTS, the symptoms can persist. One study found that about one quarter of tobacco workers in North Carolina suffered from GTS during a single season.¹²⁶

But this is just one set of symptoms that might occur in an agriculture setting when a person is forced to work in unsafe conditions. The National Hotline tends to hear of associated injuries and illnesses in agriculture such as heat exhaustion or heat stroke, pesticide poisonings, respiratory issues caused by pesticide inhalation, and severe dehydration. Potential victims in the related industries of forestry and landscaping can also report similar health concerns to the Hotline.

*Names and other details changed or omitted to protect the confidentiality of potential victims.

Employer-controlled victim living quarters may also contribute to health concerns, specifically for agriculture workers under the H-2A visa program which requires employers to provide suitable housing. Countless cases from the National Hotline report potential victims who are not given access to running water, proper ventilation, or food refrigeration. One such case involved potential victims who reported living outdoors in the barn, sleeping amongst the farm animals' feces and various pests and rodents.

In construction cases involving potential labor trafficking and exploitation, the National Hotline has heard from potential victims who have suffered severed fingers, serious head, neck, and back injuries from falls, and electrical burns. In cases of potential trafficking and exploitation in domestic work, potential victims reaching the Hotline often report suffering from malnourishment, back problems, skin and respiratory issues from unprotected exposure to harsh cleaning chemicals, and exhaustion resulting from a lack of sleep due to their constant 24/7 working hours.

Some potential victims in carnivals are also deprived of sleep due to long working hours, which put them at serious risk of injury since they must operate, construct, and dismantle heavy machinery and ride equipment.

While reports directly from potential victims in nail salons are scarce on the National Hotline, health studies on nail technicians have shown that chronic exposure to unregulated chemicals in unventilated salons may be linked to cancer, respiratory issues, asthma, skin ailments, congenital malformations, miscarriages, and infertility.^{127,128}

It's also important to note that labor trafficking survivors can be exposed to similar psychological trauma as sex trafficking survivors due to the often frequent nature of verbal abuse, threats, heavy monitoring, and isolation. While potential victims of labor trafficking often do not freely disclose these issues in the context of the National Hotline, one 2015 study conducted by the International Organization for Migration (IOM) and the London School of Hygiene and Tropical Medicine found common symptoms of psychological stress in migrant workers and labor trafficking survivors in the studied populations in Argentina, Peru, and Kazakhstan.¹²⁹

Since all of these health concerns could result in the potential victim seeking medical intervention, it underscores the importance for all health care professionals to be vigilant in identifying similar work-related injuries and illnesses for potential indicators of labor trafficking and labor exploitation.



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Substances Used as Coping Mechanisms

While the Polaris survey nor the focus groups specifically asked about substance use during trafficking, **17 percent of survey respondents reported seeking substance use disorder treatment at some point during their exploitation.** Additionally, 430 potential human trafficking cases reported to the National Hotline involved a drug recovery center coming into contact with the victim in some way. Furthermore, in all focus groups concerning sex trafficking, drug and alcohol use was brought up voluntarily by survivors, as something many struggled with or occasionally partook in.

This is in line with the general understanding among substance use and addiction research that individuals experiencing chronic trauma, including survivors of trafficking, will often use substances to assist in numbing or dissociating from the painful reality of their current circumstances and/or early trauma. Survivors of all forms of trafficking may also use substances long after their exploitation to cope with the uncomfortable and exhausting post-traumatic responses that their bodies have developed and maintained due to the trafficking, such as intrusive thoughts, re-experiencing symptoms (i.e. “flashbacks”), and hypervigilance.

In one 2016 study of 250 treatment-seeking youth, those who were involved in sex trafficking were found to have a higher prevalence of substance use compared to youth who were sexually assaulted but not trafficked.¹³⁰

Audrey Morrissey, Survivor & Associate Director of My Life, My Choice in Boston, MA, explained why she relied on substances during her exploitation:

“As I continued in the life... whether I was on a street corner or on a stage, I began to drink alcohol. And alcohol was a way for me to feel [numb]. Like I’m here, but I’m not here. What I can tell you is that substances were a form of numbing that felt okay, particularly when I had to perform sex with a bunch of strangers, I found that opioids kind of helped me to kind of leave the building.”¹³¹

Other Survivor Mental Health Issues

Beyond substance use, potential victims reaching out to the National Hotline and survivors in Polaris focus groups have shared their experiences dealing with the mental health consequences of trafficking. From the literature, it is understood that labor and sex trafficking survivors experience high rates of PTSD, depression, suicidal ideation and suicide attempts.¹³² Some survivors in Polaris focus groups discussed visits to hospital psychiatric units both during and after their exploitation, like the story from one sex trafficking survivor below:

“After several weeks of literal torture, both physically and mentally, and not being allowed to sleep sometimes as long as 5 days [as I] worked around the clock... at one point I tried to kill myself. I had gone into the hospital to try to have them admit me one late afternoon. And they said “no, I think you’re fine” and just set [an] appointment. So I left, and I don’t even remember taking pills, but ended up having convulsions and stuff. My trafficker drove me to the same hospital that night and they kept me for several days. Psychiatric people talked to me. Then, they called [the trafficker] to come pick me up, with my daughter. They were saying what a terrible person I was and that I was trying to kill myself. My trafficker was in the room. What was I going to say? My daughter was in the room. [I replied] ‘No, it was a mistake, I was just in a hurry and thought I took one pill and must have forgotten and kept taking more. You know, it’s close to my daughter’s birthday, I just want to get home for the holidays to have my daughter’s birthday.’...And they said that I was just trying to get attention.”

Despite the great need for comprehensive, trauma-informed, services, the mental health discipline is another field where the potential lack of knowledge seem to be noticeable by survivors in Polaris focus groups and potential victims on the National Hotline. At any given time on the National Hotline, a potential victim is likely calling to request a referral to a psychologist that specializes in treating survivors of human trafficking. Potential victims on the Hotline and survivors in Polaris focus groups often discussed their inability to feel understood or accepted at traditional mental health

clinics, and even in centers specializing in related issues such as intimate partner violence. One survivor of sex trafficking talked about her ongoing struggle with mental health professionals:

"I will say the lack of empathy has been a really big problem for me as well. And the lack of knowledge about trafficking. Even the therapist I am seeing now doesn't know anything about trafficking. I have a couple of good health care professionals I trust now that are reasonably empathetic and knowledgeable and can actually treat some of the stuff that's going on."

Health Care Experiences Post-Trafficking

The trauma of being trafficked does not disappear when the survivor leaves a trafficking situation. Nor does the need for regular health care.

One survivor of sex trafficking at a Polaris focus group reported that because of her frequent visits to the ED during her sex trafficking situation, she was deemed by hospital staff as a habitual "resource seeker" or "frequent flyer," potentially thought to be intentionally draining the hospital's time and resources. As a result of this label, health care professionals were more resistant or reluctant to give thorough care. This history still inhibits her ability to get care at these facilities today, long after she's left her situation. How she received this label is still puzzling to her, as all her interactions with medical facilities were a direct result of injuries inflicted on her during her trafficking. She explains:

"I was labeled as a frequent flyer in the hospitals there. To me it was a little shocking because I was never coming in looking for painkillers. I was never coming in high or anything like that. I was always coming in with broken bones and broken fingers, and broken toes, and I had my back broken twice. I guess it was just because my trafficker was a female that no one really questioned it."

This sort of reaction is all too common. Many survivors in focus groups also elaborated on how their poor experiences during their trafficking situation have made seeking care for themselves or their family a disruptive trigger in their post-trafficking life. One survivor of sex trafficking explained:

"I can't go to the hospital. I can't bring my kid to a doctor because there is no bigger trigger for me. One of the things that has been on my heart since I got free was that trauma-informed care piece, because the doctor at Juvenile Hall told me that they don't do rape kits on prostitutes. They [allegedly] "don't have the funding.""

Other reactions from health care professionals were less overtly dismissive, but still made survivors feel as though they felt unprepared or ill-equipped to care for a survivor of trafficking. One survivor of sex trafficking from a Polaris focus group discussed her new gynecologist's seemingly startled stare and lack of verbal response when she told the doctor of her sexual trauma history due to sex trafficking. Other participants even disclosed invasive and inappropriate questions from health care professionals upon their disclosure.

"I have told male professionals that I was trafficked and they would say really creepy [statements] or inappropriate questions."

Case Study: Kate's Story

Kate*, a survivor of outdoor solicitation sex trafficking from a Polaris focus group, discussed a troubling situation she experienced during a recent emergency department visit due to a severe panic attack, brought on by her intrusive night terrors and general anxiety. She presented to the ED and proudly explained during the focus group:

"There is no shame in my game. I self-disclose [my trafficking history]. It's my story and it empowers me. I'm honest with my health care [providers] today."

She explained her story of being sexually exploited from age 17-19 and how it's was seriously affecting her overall mental health and sleep patterns. She admitted she had been self-medicating with marijuana but no longer had access, therefore the traumatic symptoms were becoming debilitating. She then discussed how her doctor became combative, as if to question her traumatic history, and dismissive of her story. When he did try to engage her on her history, it became clear he required education on what sex trafficking even was. She disclosed to the focus group how she felt and how she questioned her choice to self-disclose:

"[They treated me like] I was drug seeking because I smoke pot. [Like] I'm this huge drug addict. And that's not even the case! But [the doctor] just treated me like I was a piece of shit and I was just this dirty person. Even though I had been out of the life for so long... Even the nurses were just brash and abrasive... Maybe if I had said I'm having a panic attack because [someone] died they would have been more empathetic towards me?"

She eventually called her advocate from her local anti-trafficking service provider who arrived to the hospital and advocated for her needs and helped educate the medical team. It wasn't until this advocacy that the treatment and understanding from the health care workers improved.

This survivor's experience highlights the vital importance for trafficking and trauma-informed care training, but also shows the immense benefit building partnerships with anti-trafficking service providers can have on both ends of the patient-provider relationship.

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

This is not to say that all survivor interactions with health care professionals were overtly negative. A handful of survivors in both the sex trafficking and labor trafficking focus groups reported positive or neutral experiences with health care professionals in their post-trafficking life. One survivor who works with health care professionals as a survivor leader in her community, explained the essential and trail-blazing role of hospital social workers:

"I think the clinical social workers... in [state redacted], have really been that point of contact in the hospitals. They've been huge advocates for awareness [among their colleagues]!"

Another survivor of sex and labor trafficking provided her story:

"I've had some amazing experiences with health care providers in the last couple years. So, I think it's double-sided where both education on how to identify potential victims needs to take place, as well as training health care providers on trauma and ways to provide trauma informed care. For example, I had an anesthesiologist who called me the night before a major surgery and spent a whole hour talking to me so I could get used to her voice. She said, "I know you have complex trauma background, this is my protocol for complex trauma..." The next day when I came in for surgery, she spent a whole hour with me, prepping me and helping me feel safe... It was a very complex surgery and coming out of it was going to be very difficult. When I came out of that surgery though, it was amazing, I felt comfortable and protected. Her sensitive, trauma-informed care made a difference."

Health Care Industry: Recommendations and Opportunities

1. Require Completion of Human Trafficking Training for all Staff at Health Care Facilities

Health care facilities should require staff at all levels, from receptionists and registration staff and security, to physicians and nursing staff, to complete substantive training on human trafficking. One of the most comprehensive options available is [SOAR Online](#), a new, free-of-charge series of self-paced online training modules that individual health care professionals can complete to receive Continuing Education Units (CEUs) or Continuing Medical Education (CMEs). SOAR online is designed to reach professionals in health care, behavioral health, public health, and social service roles to ensure all personnel in these systems are on the front lines to support trafficking survivors. The training includes an introductory module on the SOAR framework, educates practitioners on what human trafficking looks like in the United States, the possible indicators and barriers apparent in health care and social service settings, and how to screen patients and assess their needs. Additional modules are dedicated to providing trauma-informed interventions, culturally and linguistically appropriate services, and real world case studies that apply the training content in practice.

Coupled with a foundational human trafficking training like SOAR, health care facilities should also ensure that health professionals are aware of their local and national resources and mechanisms to access them.

Although a number of human trafficking trainings for health care professionals exist, the quality of these trainings is highly variable. For example, some trainings for health care professionals completely omit labor trafficking considerations, and some have sensationalized

images and language that does not line up to the reality of how human trafficking may present in health care settings. Other trainings have misinformation or incomplete information about reporting to law enforcement or create a sense of fear among health providers to get overly involved in a potential trafficking situation. There are vetted government and non-government resources that provide technical assistance for health care professionals, including resources available through HHS NHTTAC, in addition to HEAL Trafficking's "[Essential Components for a Health Professional Trafficking Training](#)," which sets standards for any trafficking training for health professionals, including common pitfalls to avoid.

While some health systems and/or state associations may already provide human trafficking training tailored for a more local context or specific need, health care facilities are strongly encouraged to add the SOAR modules focused on providing trauma-informed care and culturally and linguistically appropriate services into a facility's training requirement. HHS NHTTAC also offers an option for health systems to deliver the online SOAR trainings directly through their respective learning management systems.

2. Urge Congress to Pass the SOAR to Health and Wellness Act

The Stop, Observe, Ask, and Respond (S.O.A.R.) to Health and Wellness Act of 2018 (H.R. 767), sponsored by Congressman Steve Cohen (D-TN), would extend the important work of the SOAR to Health and Wellness program already underway at the Department of Health and Human Services (HHS). The bill would re-authorize and expand funding to ensure that health care and related professionals have access to comprehensive training and technical assistance to help trafficking victims. Additionally, the bill would authorize grants to health

care sites and organizations and would centralize data collection on the program's reach. There are over 12 million people employed in health care occupations, which is over 9 percent of the national workforce.¹³³ Imagine the possibilities if all of these professionals had access to quality, data-driven training on human trafficking. In February, the bill successfully passed the House and was referred to the Senate Committee on Health, Education, Labor and Pensions later that month. As of this publication, no hearings have been scheduled. Polaris encourages the national health care workforce to join in urging the Senate to pass the SOAR to Health and Wellness Act of 2018, to ensure this industry remains equipped to provide survivors the care they deserve.

3. Seek Out Resources to Address Implicit Bias

Implicit bias, or preconceived notions about particular groups of people that may unconsciously affect interpersonal interactions or treatment, has been well documented across many social systems, and health care is no exception. As evident in the many disheartening reactions shared by sex trafficking survivors at Polaris focus groups, some health care professionals may unconsciously hold such bias against individuals engaged in the commercial sex industry, or even those who may be victims of interpersonal violence. Microaggressions and victim-blaming are just two symptoms of implicit bias that can be felt by patients. Research shows that people tend to victim-blame in order to make sense of unjust circumstances and to emotionally distance themselves from the harsh reality that devastating things can happen to innocent people like us.¹³⁴ Recognizing symptoms of implicit biases, like victim-blaming, and where they may be coming from is the first step to dismantle barriers and power dynamics and improve trusting interactions between practitioners and patients. The second step may be to use this information to re-think individuals previously deemed as "difficult patients."¹³⁵ Currently, it does not appear that there are any available trainings or resources specifically geared toward implicit bias against individuals in the sex industry. While development of such materials may be an interesting area for researchers to pursue, it may be important to start with some foundational resources designed to help health professionals understand, address, and overcome

implicit bias more generally. Some beginner resources to consider are below:

- [Project Implicit](#)
- [What Is Bias, and What Can Medical Professionals Do to Address It?, Institute for Healthcare Improvement](#) [YouTube Video]
- [Implicit Bias -- how it affects us and how we push through](#), Melanie Funchess [TEDx Talk]
- [The New Science of Unconscious Bias: Workforce and Patient Care Implications, Critical Measures](#) [PowerPoint Presentation]

4. Create Human Trafficking Identification & Response Protocols or Adapt Existing Protocols

Awareness is not enough. Health care professionals should be equipped with strong protocols, including knowledge of how to approach a potential victim, and connect them to the services they need. This may not require an entirely new process, but may instead, in some cases, be adapted from and integrated within existing strong protocols on intimate partner violence, sexual abuse, or child abuse.

According to HEAL Trafficking, an effective protocol should aim to create "safe procedures and spaces where professionals can provide exploited adults and minors education about their options and empowerment to seek assistance."¹³⁶ Survivors in Polaris focus groups, strongly supported this approach, stressing that protocols and assessments should not be exclusively focused on prompting a victim's disclosure or immediately removing the individual from the trafficking situation. Rather, they'd like to see health care professionals engage them in safety planning, assess their needs and desires, offer resources for support, and ultimately work collaboratively with them as partners in determining the best course of action for their unique situation going forward.

There are numerous resources available to help in the creation of strong protocols. HEAL Trafficking and Hope for Justice's [Protocol Toolkit](#) is an example that walks through, in detail, every component of a successful pro-

protocol including, interview strategies, safety considerations, strategies for working with minors, procedures for documentation, multidisciplinary treatment and referral plans, the steps to successfully implement the protocol at your facility, and much more. Additionally, while SOAR Online also offers general guidance on how to apply the SOAR framework to workplaces, NHTTAC also offers technical assistance for health care institutions looking to further channel this knowledge into creating organizational protocols. Please visit NHTTAC's website or email info@nhttac.org to learn more about NHTTAC's training and technical assistance.

“Since I was often taken to different doctors and to the ER to treat trafficking related injuries, I wish that someone would have taken me aside and asked those [screening questions] or even asked me if I was okay. Had they simply separated me from my mother, my father, or the people that they would send with me, and just ask me if I was okay... You know what, I might have been too scared to disclose the first time, but maybe if they would have done this several times in a row, I think I would have found that to be a place of safety and perhaps even divulged what was happening.”



Human Trafficking Assessment Resources

Human trafficking specific assessments are a fundamental part of any good health care protocol. However, 57 percent of Polaris survey respondents reported they were never asked any trafficking or abuse screening questions by health care professionals during their exploitation. We have learned from other fields, such as intimate partner violence, that creating an environment which is safe for disclosure is vital before asking sensitive questions about abuse and exploitation. While there is not currently a screening tool validated for health care settings,¹³⁷ below are some examples of screening tools health care facilities could consider adapting and incorporating into their protocols.

- [Adult Human Trafficking Screening Toolkit and Guide](#) (NHTTAC)
- [Trauma-Informed Human Trafficking Screenings](#) (National Human Trafficking Hotline)
- [Human Trafficking: A Guidebook on Identification, Assessment, and Response in the Health Care Setting](#) (Massachusetts General and Massachusetts Medical Society)
- [A Short Screening Tool to Identify Victims of Child Sex Trafficking](#)¹³⁸
- [Out of the Shadows: A Tool for the Identification of Victims of Human Trafficking](#) (VERA Institute of Justice)

Above all, survivors at Polaris focus groups strongly emphasized the need for the patient to be alone during any screening questions, no matter the relationship of the accompanying party, and offered some suggestions on separating the potential victim, as one survivor mentioned:

“If [a health care professional] thinks something is going on, order an X-ray whether or not she needs one or not. Split her up from [the potential controller]!”

HEAL Trafficking and Hope for Justice’s [Protocol Toolkit](#) offers additional strategies for implementing a separation protocol in order to interview patients alone.

According to survivors from focus groups and SOAR Online, trafficking assessments in a health care setting should focus on the patient’s emergency, medium, and long-term needs and should not be invasive or require in-depth details of their exploitation. Survivors also discussed the importance of asking assessment questions in a warm, trauma-informed manner that facilitates comfort in disclosure, as one survivor explained:

“I think that the health care workers being able to be trained in the way that they ask those questions [is important]. Because if you ask somebody questions off a monitor [it will affect] the way that they respond. But if they ask them in a more compassionate way... I think it would just be a huge difference in the way that care is given.”

5. Post the National Human Trafficking Hotline Numbers for Patients to Access

“Yeah, it’s very important to put [the Hotline number] in the ER bathrooms... If you can purchase a short clip or video that the hospitals can put on their TVs. And not only sex, labor [too]! Just a short clip how the hospital could help.”

Survivors in all Polaris focus groups largely supported posting information about the National Human Trafficking Hotline numbers in areas where potential victims and at-risk patients could access. Some states such as Texas¹³⁹ and California¹⁴⁰ already have this built into their mandatory Hotline posting legislation. Generally though, survivors warned that handing the patient information directly - through a card or a pamphlet for example, may cause harm since the trafficker may find it and throw it out or target more violence to the victim. Instead, survivors offered a number of ideas including scrolling video clips on waiting room televisions, stickers inside bathroom stalls, and window clings in private patient bathrooms (typically where urine tests are administered, since patients are alone at this time). Survivors frequently explained that even if they are not ready to call for help or initiate leaving that day, seeing that help was available could “plant the seed” for when they start to reconsider reaching out.

Materials should use language most relatable to potential victims, such as experiences or red-flags of unsafe or abusive behavior commonly present in trafficking situations. They should also address

experiences of both sex and labor trafficking victims. Exceptional materials should remind patients that the facility is a safe and confidential space and explain what supportive services the facility can provide if a patient is in need. Any images should be diverse in ethnicities, genders, and ages, and not be sensationalized, which will cause survivors to disconnect their experience from the message. As always, consulting with survivor leaders throughout the outreach material design is crucial.

“[Post the hotline number] where they do the urine tests in the back, not just the public bathrooms in the [waiting room]. Because if you go back for a urine test, they’re not going to have your trafficker or anyone go with you.”

Federal government resources on public awareness materials include the HHS [“Look Beneath the Surface”](#) campaign and the Department of Justice Office for Victims of Crime [“Faces of Human Trafficking”](#) video series, among others. For example, the HHS public awareness campaign provides specific posters, brochures, and PSAs tailored for health care settings. Additional materials including a videos, stickers, and web graphics are available for general audiences.

6. Integrate Trauma-Informed Care as a “Universal Precaution”

One of the biggest takeaways from Polaris focus groups was the strong emphasis that health care professionals should approach care from a trauma-informed perspective. Unfortunately many of the survivors in Polaris focus groups shared that they were traumatized by their experience with health care. Not only did these negative experiences with health care possibly prevent them from disclosing their exploitation, but in some cases it caused survivors to avoid seeking future health care. We know that trauma in its many forms is a pervasive human experience. Applying a trauma-informed care approach to all patient interactions, therefore, allows health professionals to provide an environment that is safer for all survivors of abuse, including trafficking victims. A trauma-informed approach requires a fundamental shift in perspective from “what is wrong with you?” to “what happened to you?”^{141,142} The principles of trauma-informed care, as outlined by SAMHSA include safety; trustworthiness and transparency; peer support and mutual self-help; collaboration and mutuality; empowerment, voice, and choice; and cultural, historical and gender issues.¹⁴³ By transforming our health systems and health professional approaches to embrace trauma-informed principles, we will allow for all patients who have experienced trauma to be healed, rather than additionally traumatized by their health care interactions.

7. Develop Interdisciplinary Partnerships with Anti-Trafficking Service Providers

While the impactful role of health care professionals is apparent, they cannot entirely fulfill all the needs of a trafficking survivor. Therefore, it’s essential to establish local partnerships with anti-trafficking programs who can provide or coordinate services such as ongoing case management, housing, independent life skill training, substance use disorder treatment, legal advocacy, and other psychosocial services. A model already widely adopted in domestic violence and sexual assault (DV/SA) cases, is a hospital advocacy model where an advocate is sent for every consenting DV/SA patient that presents to the hospital. YWCA of Metro St. Louis Crisis

Intervention is just one example of an anti-sex trafficking agency who has a partnership with 17 of its area hospitals and clinics. These advocates can provide emotional support for potentially trafficked patients, explain the services available to them, and be a liaison between the patient and medical staff. Many anti-trafficking NGOs also provide training and systems change for staff. If you are not aware of the anti-trafficking service providers in your area, please visit the [National Human Trafficking Referral Directory](#) or call the Hotline for a local referral.

8. Develop Interdisciplinary Partnerships within Health Care¹⁴⁴

When trafficking survivors access health care, they have a myriad of physical and mental health conditions that require treatment. Unfortunately, as U.S. health care delivery is fragmented, accessing necessary health practitioners can prove difficult, confusing, traumatizing, and expensive. While this system may be frustrating for many health care consumers, this can further discourage patients experiencing trafficking to build trust and seek the proper care to address their unique needs. Thankfully, there are a couple models of health care delivery which address this fragmentation of care.

First, community health centers, which are integrated into their local communities, are uniquely poised to care for trafficking victims. Dr. Kimberly Chang explains,¹⁴⁵ “We [community health centers] are a little bit different because we’re based on the ground in the community, in underserved communities,” she says. “We also have community health workers that are internal that help the patients navigate our system, and sometimes external, going out into the community...As a system, I believe we’re much more integrated into the community and into the populations that we see.” Moreover, many health centers already focus on the integration between primary care and behavioral health, as well as integration of oral health care and primary care.

Another model of care to consider is human trafficking clinics, which specifically serve to provide holistic health care services to trafficking survivors. The design allows for the patient to see all of their health providers in one physical location. Such clinics currently exist in Florida, Massachusetts, New York, California, Illinois, Hawaii,

and Texas. In some cases these specialized clinics provide care exclusively for trafficking survivors, and others serve victims of other forms of violence as well, such as asylum seekers and victims of sexual assault. Many of these clinics rely on community health workers, or patient navigators, who serve as a communication point for, and support in and outside of the health care setting for the survivor.

Regardless of the health care delivery model to achieve it, trafficking survivors require whole-person care which integrates services across medical specialties to address their medical and non-medical needs.

9. Engage in Prevention with Patients at Risk¹⁴⁶

Health professionals are not only on the front lines of identifying and caring for victims currently being trafficked, but also preventing trafficking before harm occurs in the first place. Prevention is an essential component of the public health response to trafficking. Populations that are vulnerable to trafficking, such as homeless youth, immigrants, those within the commercial sex industry, those with substance use disorders, or those with disabilities may come into contact with a health professional prior to being recruited by a trafficker, or even during the recruitment process. By working with multidisciplinary teams to address social determinants of health while also building on a patient resilience, some of the factors that make someone vulnerable to trafficking may be mitigated. While populations who are at risk for trafficking may present to a diverse range of health specialties, notably emergency departments and community health centers are seen within the health care system as caring for the most vulnerable and underserved patients. These venues may be ideal locations for innovative pilot programs and funding streams targeted for human trafficking prevention, intervention, and evaluation efforts.

10. Advocate for a Comprehensive Labor Trafficking Health Study¹⁴⁷

Much of the research on the health needs of trafficking victims in the United States has focused on sex trafficking victims. It is past time for us to have a comprehensive understanding of the unique health concerns of the thousands of individuals trapped in forced labor in the United States. Additional research and data can inform health care professionals to develop data driven treatments and response protocols for all survivors of human trafficking. Such a study should:

- Address a full scope of the physical, psychological, and environmental health concerns and symptoms of labor trafficking victims both during and after their trafficking experience.
- Include labor trafficking survivors representing all types of labor trafficking business models or industries.
- Include diverse genders, ethnicities, ages, sexual orientations, education backgrounds, and not be limited in scope to one state or region of the United States.
- Collect data on health care access during exploitation such as types of health care facilities used, presenting health issues, health care coverage, workers compensation access, and experiences with health care professionals.
- Provide survivor-informed recommendations for health care professionals when assessing and treating labor trafficking survivors.

If you're a health care professional interested in learning more about fighting human trafficking from a public health perspective, please visit HEAL's website, www.healtrafficking.org and join the network, or email info@healtrafficking.org.



Housing & Homelessness Systems

A photograph of a multi-story apartment building with a grid of windows. The building has a textured, light-colored facade. The windows are arranged in a regular pattern, and some have curtains or blinds. The sky is overcast and grey. The text "Housing & Homelessness Systems" is overlaid on the left side of the image.

Housing & Homelessness Systems

Strengthening a victim's access to safe and affordable housing would dramatically eliminate a tremendous swath of vulnerable people from the pool that traffickers have to choose from. Ensuring someone has a safe place to call home allows them the physical and emotional space to thrive. Yet to date, the majority of discussions around housing and human trafficking centers on the lack of safe, short-term shelter beds. This is a real and ongoing problem. There are not enough shelter beds for a diverse range of people to meet the need either for survivors who are trying to rebuild their lives, or for vulnerable people who are at risk for being trafficked in the first place. But emergency shelter is only part of the picture. Stakeholders across the housing system -- landlords, property managers, rental management companies, vacation rentals, developers, government agencies -- all have a role to play in preventing and disrupting trafficking.

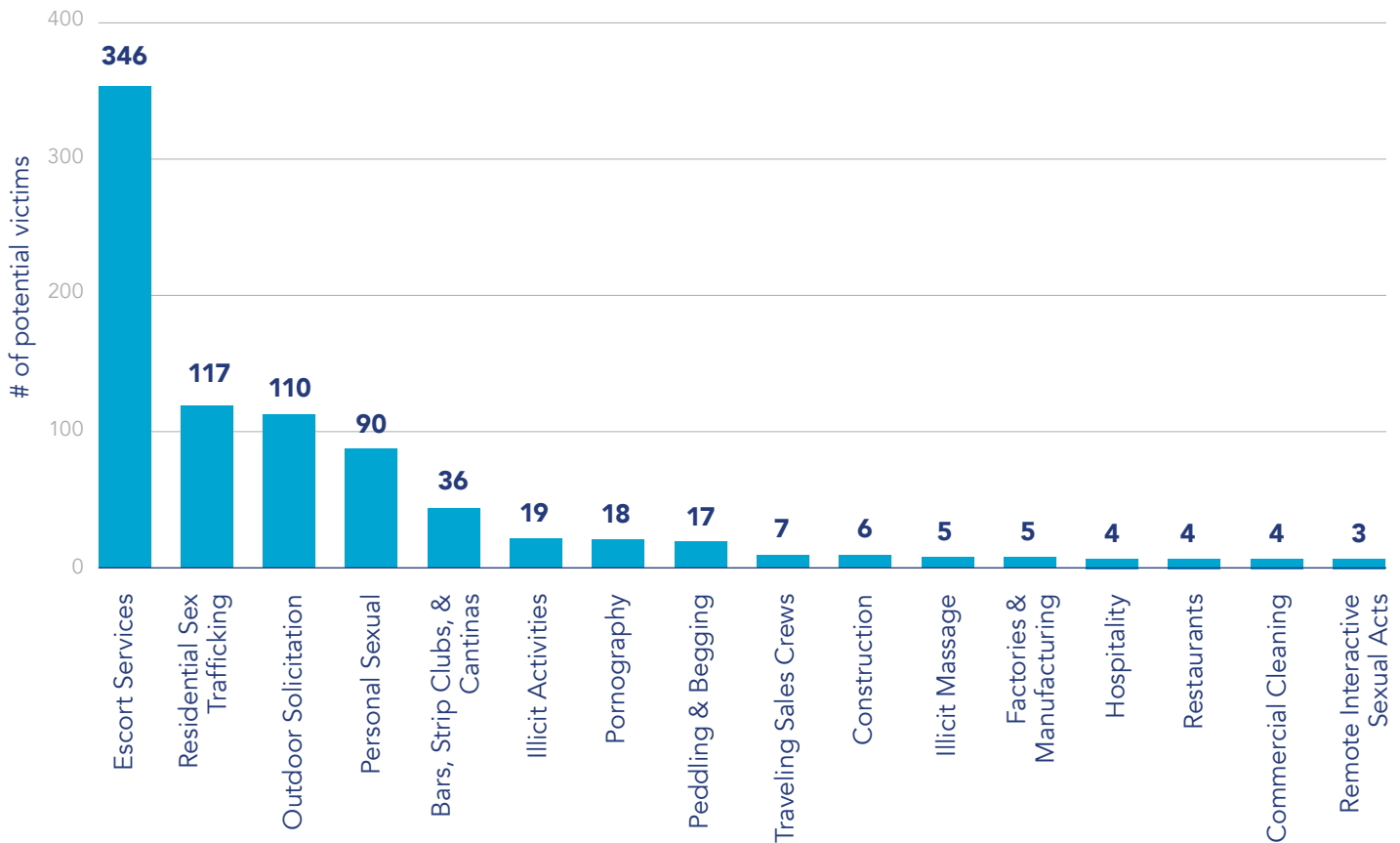
How Housing & Homelessness Systems may be Used in Recruitment

In Polaris's survivor survey, 64 percent of survivor respondents reported being homeless or experiencing unstable housing when they were recruited into their situation. Similarly, from January 2015 - December 2017, **the National Human Trafficking Hotline learned of 1,548 potential victims of human trafficking who were reported to be experiencing the same unstable housing circumstances at the start of their trafficking situation.** Potential victims experiencing homelessness have been forced into many different types of trafficking, including but not limited to, escort services, residence-based commercial sex, illicit activities, begging and peddling, and outdoor solicitation. Figure 7.0 breaks down the data.

Traffickers exploit potential victims' fear of sleeping on the street, first by offering safe shelter as a coercive recruitment tactic then, as the situation progresses, by threatening to make them homeless as a means of control.

64% of survivor respondents to Polaris's survey reported being homeless or experiencing unstable housing at the time they were recruited into their trafficking situation.

Figure 7.0:
Types of Trafficking Affecting Potential Victims Experiencing Homelessness
 National Human Trafficking Hotline: January 1, 2015 - December 31, 2017 (n=1,548)



Human trafficking in runaway and homeless youth (RHY) populations has been widely documented across the anti-trafficking and related fields. The 2017 study, *Labor and Sex Trafficking Among Homeless Youth* by Laura T. Murphy, interviewed 641 RHYs being served by Covenant House in the United States and Canada, and found that nearly 1 in 5 youth (or 19 percent) had been a victim of human trafficking. They had been victims of sex trafficking (14 percent), labor trafficking (8 percent), and of both sex and labor (3 percent).¹⁴⁸ However, this study was not limited to individuals who were homeless before their trafficking situation, as some survivors in the study reported being trafficked by their parents during their early childhood that pre-dated their homelessness.

Homelessness, Sex Trafficking, and Survival Sex

In the Murphy study, of the youth who reported being trafficked for sex, engaging in survival sex, or generally trading sex for money, 68 percent reported doing so while they were homeless.¹⁴⁹ This trend can also be seen in the National Hotline data set since escort services, residence-based commercial sex, and outdoor solicitation are the top three types of trafficking affecting all individuals experiencing homelessness.

Survival sex is when an individual engages in sexual activity in exchange for basic living necessities such as food and housing. This arrangement could be voluntary (with adults 18+), exploitative, or rise to the level of sex trafficking, depending on the conditions. In the Murphy study, 19 percent of all youth interviewed reported engaging in survival sex.¹⁵⁰ When the exploiter implements elements of force and coercion in survival sex situations, such as coercing the victim with drugs or threatening to make them homeless if they don't comply, the National Hotline considers this experience part of the personal sexual servitude trafficking business model. Recruitment of homeless individuals in this type of trafficking also tends to involve the exploiter misrepresenting a living arrangement or intimate relationship with the potential victim.

Despite only about 6 percent of potential victims with unstable housing being forced into survival sex situations since January 2015, according to National Hotline data, Polaris believes this is likely an extremely underreported type of trafficking in this data set. Self-identification is a barrier in any trafficking case but likely even more so with individuals who are trading sex for basic needs. Most often, these individuals don't see themselves as victims, or even what they are doing as commercial sex, but simply as doing what they need to in order to survive. This can even be the case if elements of trafficking are present.

Runaway and homeless youth can also enter into "sugar baby" relationships with much older partners (a.k.a. "Sugar daddies" or "sugar mamas") in exchange for gifts, funds, or necessities. The 2017 Murphy study found that 20 percent of the youth who had engaged in the sex trade had been involved with an older "sugar daddy" or

LGBTQ+ Homeless Youth

Already struggling with fewer resources, employment opportunities, or social supports, as well as increased rates of discrimination at the hands of their families and peers, LGBTQ+ homeless youth are 3-7 times more likely to enter the street economy and engage in survival sex to meet basic needs over their non-LGBTQ+ homeless peers.¹⁵¹ According to a study released in 2015 by the Urban Institute, 46 percent of LGBTQ+ youth trading sex for survival in New York City, first became introduced to the idea of the sex trade by friends who were already in the life.¹⁵²

Despite some misconceptions that LGBTQ+ individuals are more likely to perpetrate sexual violence rather than be victims of it, LGBTQ+ homeless youth are 7.4 times more likely to experience acts of sexual violence than their non-LGBTQ+ peers.¹⁵³ The National Hotline often hears of potential traffickers exploiting an LGBTQ+ person's housing insecurity and need for family, threatening to "out" them to loved ones, manipulating their self-worth, causing distrust of others, and withholding hormone therapy or other gender-affirming necessities in order to control them. However, it's crucial to acknowledge that, despite the presence of additional barriers and vulnerabilities that traffickers can exploit, this population possesses a sense of agency and strength that enables individuals to face adversity and stay safe. In order to successfully support this population, service providers, law enforcement, and other stakeholders must harness that resiliency by equipping LGBTQ+ communities with the tools to protect themselves and their peers from those who seek to exploit them, while also ensuring that comprehensive and inclusive resources are available when needed.

For more information on how LGBTQ+ youth can prevent human trafficking from occurring within their communities, please see Polaris's 2016 report [Staying Safe: Tips for LGBTQ Youth](#).

“sugar mama” for at least one of their reported sex trade experiences.¹⁵⁴ While not all of these relationships are exploitative, the National Hotline has seen cases where the exploiter begins controlling the victim’s movements or social relationships, becomes physically or sexually violent, and can withhold the promised financial assistance or shelter until sex is exchanged.

Homelessness and Labor Trafficking

The vast majority of studies involving RHYs focuses on their high rates of sex trafficking, survival sex, or general involvement in the commercial sex industry. What is unique about the Murphy study is that it illuminated the experience of labor trafficking among this population, finding that 8 percent of the 641 interviewed youth were trafficked for labor at some point in their lives. The vast majority (81 percent) of these youth were forced to sell drugs. Many participants in the Murphy study explained that the drug trade was normalized early in life while their families were desperate to make ends meet. While some RHYs reported being coerced as children to run drugs for their family’s drug trade businesses, others described having been threatened by drug dealers, or violent gang-related traffickers.¹⁵⁵ The National Hotline sees this trend as well, mostly with homeless young women who are forced to sell drugs in combination with selling commercial sex.

Sex Trafficking Recruitment at Shelters

Sex trafficking recruitment has been documented by the National Hotline at homeless shelters, domestic violence shelters, RHY shelters, group homes, and through other shelter programs. From January 1, 2015 - December 31, 2017, the National Hotline identified 1,233 potential victims of sex trafficking where the type of location of their recruitment was known.

Nearly 15 percent of these victims were recruited directly from shelter programs or group homes.

This is possible in part because many such shelters do not have confidential addresses in order to ensure that the homeless community can know where to receive services in any given city. However, this also means traffickers know exactly where these shelters and their vulnerable residents are and can monitor the premises and approach prospective victims as they come and

go. Offers of more comfortable or private living conditions, free food or illicit substances, and intimate relationships are often used to coerce potential victims to initially engage with traffickers.

According to National Hotline data, potential traffickers typically avoid directly recruiting from shelters and instead opt to send other potential victims into these spaces to recruit on their behalf. In fact, the most frequently reported type of recruiter for National Hotline victims lured from shelters or group homes was another potential victim. At the behest of their traffickers, these potential victims befriend others in the shelter and utilize tactics like manipulation of the friendship, assurances of a happier life once out of the shelter, or false promises of financial gain. In some cases recruiters will promise the potential victim that their boyfriend or “pimp” will financially provide for them, in other cases the potential victim is unaware that a third-party trafficker exists at all.

Potential victims may also attempt to leave their trafficker multiple times and seek shelter while doing so. However, because of the intensive manipulation, trauma-bonding, and lack of gainful economic opportunities available to them, they may end up leaving the shelter to return to their trafficker. Occasionally, these victims may bring other women from the shelter back with them, sometimes hoping to regain the approval and forgiveness of their potential trafficker.

Case Study: Jasmine's Story

A runaway homeless youth shelter seemed like the safest option for Jasmine* when she needed to get away from her abusive step-mom. Jasmine entered the shelter when she was 18 and immediately befriended Tasha*, who was only slightly older, and claimed to have a similar background. Tasha invited Jasmine to church, defended her in arguments, and bonded with her over their shared adversity. After about a month, Tasha moved out of the shelter and asked Jasmine to come with her. Tasha told Jasmine that she could make some money by going on dates with older men and would eventually be able to support herself. Jasmine did not anticipate providing commercial sex on these "dates" and was excited by the possibility of being independent.

Jasmine moved out of the shelter with Tasha a few short weeks later. After only three nights at Tasha's apartment, Tasha told Jasmine that she needed to start making money if they were going to live together, otherwise she would end up hungry and homeless all over again. Tasha brought Jasmine to a hotel that night and told her that she was going to have sex with men who would be arriving throughout the evening. Tasha took all of the money made and also began forcing Jasmine to dance and have commercial sex at a nearby strip club. Jasmine was made to sleep on the floor of their apartment and turn over all of her food stamps to Tasha. This situation went on for months until Jasmine texted the National Human Trafficking Hotline for help.

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



How Housing & Homelessness Systems may be Used in Trafficking Operations

The threat of being without a place to live, or a place to go, hangs over many trafficking victims at some point in their situation, whether it is a threat from their trafficker or implicitly tied up in the economic hardship they may be facing. Indeed, **64 percent of respondents to the Polaris survey reported that the lack of affordable housing was a barrier in their ability to leave their trafficking situation.** Some traffickers make use of this fear by constantly threatening their victims with homelessness as a method of coercion. In addition, some traffickers heavily monitor victims at their residences to ensure that when they are not working, they are also not out seeking help from others.

Formal Residential Brothels

According to a review of the 1,800 Hotline cases of potential residential sex trafficking, in addition to external research into publicly known cases, Polaris has come to understand nuanced information about the variations within this business model. While instances of commercial sex involving individual private/family households exist, typical hallmarks of formal/organized residential brothels are the use of multiple residences and the frequent rotation of victims between residences.

Large residential brothel operations often require complex networks of traffickers to rent multiple housing units, supervise victims and buyers at these units, transport victims between units, advertise to buyers, and facilitate money movement. In some situations, residential brothel operators “contract out” the recruitment, rotation, and control of victims to individual traffickers, while personally managing leases, supplying the brothels, and coordinating with buyers.

According to data from the Hotline, in some cases potential victims of formal residential brothels may be

housed onsite, while in others, they live offsite and are given assignments by their potential traffickers listing the residences they are instructed to work at in a given week.

Housing types used for these operations varies by geography. Examples may include: large apartment complexes in Houston, rowhomes in Philadelphia, upper story or basement apartments in New York City, and single family homes in suburban or rural areas. The main commonality in housing types is that these are typically rentals. In most known cases, traffickers put their own names on the leases, although multiple traffickers in a network typically hold the leases for different rentals, presumably to avoid coming to the attention of landlords or raising red flags with financial institutions. Less frequently, some networks pay others who are only loosely affiliated with the group to take out leases in their names. In rare cases, brothels are reported to be operating out of abandoned or condemned properties rather than rentals, or out of sheds or garages adjacent to single family homes. These situations often occur in conjunction with drug distribution operations, or “trap houses”.

Different trafficker business models gravitate towards differently-priced rentals. Many of the large apartment buildings used by potential residence-based sex traffickers have poor resident reviews and are in parts of town where housing is more affordable. This is particularly true of residential brothels run by traffickers targeting potential victims from Mexico and Central America, who typically use a business model reliant on short, low cost transactions and high customer volume.

By contrast, potential traffickers targeting women from East and Southeast Asia often operate illicit residential massage businesses out of higher-priced apartments

and use a business model that involves longer appointments with customers for significantly more money. This latter type of residential brothel is often harder for casual observers or property owners or managers to detect, since the low volume of transactions translates to much lower observable customer traffic.

Based on findings from the Polaris survivor survey, some traffickers also occasionally take advantage of public housing benefits to facilitate their crimes. Twenty percent of respondents to the relevant survey question indicated that their trafficker used public housing benefits to facilitate their crimes. However, it remains unclear whether traffickers operating formal residential brothels make use of public housing, or whether public housing benefits are primarily used by individual sex traffickers to house victims whom they are exploiting at other venues such as hotels, strip clubs, or escort services. It is also possible that some traffickers operating residential brothels take advantage of public housing to house victims offsite.

Residential Brothel Case Study: U.S. v. Aboulafia^{156, 157, 158}

In early 2013 in Washington state, six individuals were indicted for conspiracy to transport women for prostitution, conspiracy to use a communications facility to promote prostitution, and conspiracy to engage in money laundering. According to case evidence, the conspirators advertised women from Southeast Asia for 'massage services' on Backpage.com and had compelled the women into working for them by keeping them in massive debt and causing them to overstay their visas. Unlike most illicit massage businesses, however, this network ran their commercial sex operation out of apartments in Bellevue and Kirkland, Washington. They also operated apartments in Scottsdale, Arizona; Chicago, Illinois; and Falls Church/Tysons Corner, Virginia, according to court documents.

This operation was typical of many formal residential brothels. The leader of the scheme, Unruean Aboulafia, managed most of the strategic business plans of the network. This included working with recruiters in Thailand to maintain a supply of victims, advertising her business on websites such as Backpage.com, and managing the rotation of women between apartments. In order to maintain so many leases at the same time without raising suspicions, she recruited other individuals - paying family members and friends to take out leases in their own names. Some of these individuals were initially unaware that the apartments were being used for commercial sex, but most eventually became directly complicit in scheduling appointments with buyers and in laundering the proceeds from each location. As is typical for the residential illicit massage business model, the apartment complexes used by this network were mid- to high-cost complexes, which the group was able to pay for by charging high prices for appointments.

All members of the network ultimately pled guilty to money laundering charges, and Aboulafia additionally pled guilty to conspiracy to transport individuals for the purpose of prostitution.

Vacation Rentals

Vacation rentals are an interesting hybrid between the hospitality industry and private housing systems. As sites like Airbnb grow in popularity, research into the intersections of vacation rentals and trafficking will become increasingly valuable. However, based on conversations with survivors, some traffickers may sometimes choose to turn to vacation rentals instead of hotels since these properties are not monitored by police for trafficking or prostitution to the extent that hotels and motels are. One survivor of escort services whose trafficker preferred to utilize vacation rentals explained in a Polaris interview:

"[My trafficker] liked condominiums where you could rent out the condominium for a month or something like that. You just pay \$4,000 for a whole month for a three bedroom condo. With the vacation rentals we never had a time where we got caught by the owners [or police]. Just at the hotels."

Traveling sales crews are another type of trafficking business model that could utilize vacation rentals in place of hotels, as these options can often house far more people at a time for less than it would cost to rent multiple hotels rooms. Here too, vacation rentals are likely to receive less intense scrutiny by on-site owners or law enforcement.

Please see pg. 71 to see a list of possible indicators for hotels & motels that are also relevant to vacation rentals.

Sex & Labor Trafficking Occurring in Shelters & Residential Group Homes

As mentioned in the Health Care section of this report, the National Hotline has received reports regarding residents of shelters and transitional housing being forced into labor by the shelter/housing operators as a condition of their stay. This labor goes far beyond the typical communal chores expected by many shelter programs, and can involve agricultural work, landscaping, retail work, begging and peddling, construction, or other menial labor for upwards of 10-15 hours per day in some cases. Residents are typically not paid for this work. If potential victims refuse, they are reportedly threatened with homelessness. For residents who are there as a

mandate from the criminal justice or parole systems, or those escaping violence, these threats could have very real consequences to their freedom and safety. In less frequent cases from the Hotline, potential victims have been expected to provide commercial sex to buyers or engage in personal sexual servitude with the housing staff in order to continuing their stay.

Worker Housing in Labor Trafficking

While some employers engaged in potential labor trafficking of seasonal visa holders own the properties they use to house workers, others employers may rent short term leases on apartments or townhomes instead. According to many accounts from the National Hotline, it is all too common for seasonal workers to be housed in a single, overcrowded dwelling. Many workers who have reached out to the Hotline have reported not having their own bed, a lack of food storage space, broken plumbing or appliances caused by overuse, and not being able to shower due to the sheer number of occupants living in the space. Not only is this a violation of the workers' health and safety (and likely their visa contract), but it could be a serious fire code violation. It is also likely an infraction of the occupancy expectations outlined in most standard rental agreements.

Potential victims on the Hotline have also reported not being permitted to leave their residence - even on their off hours. They have reported being monitored inside and outside their homes by closed-circuit security cameras installed by their employers, and have to rely solely on their employers for any transportation. Therefore, neighbors and landlords may not witness potential victims coming and going normally from the home, and instead, they are always picked up and dropped off by their employer as a group.

How Housing & Homelessness Systems may be Used by Victims & Survivors

Shelter Needed in Survivor Aftercare

Just about daily, an advocate on the National Hotline can be overheard on the phone feverishly searching for a shelter that's not at capacity, pleading for a domestic violence safehouse to consider accepting a trafficking survivor into their program, or in the worst scenarios, safety planning with a survivor who must sleep outdoors that night because all other options have failed them. Housing and shelter requests are by far the most needed service for potential trafficking victims on the Hotline, but in many cases are the most difficult to fulfill.

Emergency shelter makes up an overwhelming 47 percent of all crisis requests to the National Human Trafficking Hotline.

Since December 2007, housing needs have made up 37 percent of all referral and crisis assistance requests to the National Hotline. Specifically, in crisis situations, emergency shelter makes up an overwhelming 47 percent of all crisis needs. Furthermore, **40 percent of survivors in Polaris's survey reported seeking shelter at some point during their trafficking.**

Just in the last five years, there have been noticeable improvements including runaway homeless youth shelters expanding their education on the trafficking risks of their residents. There has also been some progress in making space for underserved populations, like LGBTQ+ individuals, male survivors of sex trafficking, and individuals with disabilities who historically have

had even more difficulty accessing one of the scarce beds across the country. But there have also been major setbacks - shelters forced to cut services, roll back intakes, or close altogether due to funding constraints. These constantly evolving factors make it extremely difficult to even estimate the approximate number of shelter beds available to human trafficking survivors in the United States.

However, the most significant improvements in availability have come about as a result of the increased understanding of the overlap between domestic violence (DV) and human trafficking, which has resulted in DV shelters increasingly opening their doors to trafficking survivors. For example, every year since 2011, the National Network to End Domestic Violence (NNEDV) has included "Support/Advocacy to Victims of Trafficking" on the list of services they survey for during their annual National Census of Domestic

The inherent infrastructure and approach of domestic violence shelters simply put them in the best position to meet a trafficking survivor's needs in the many places where trafficking-specific shelters are either full, or more often, simply don't exist.

Violence Services. In 2016, the census indicated that out of 1,762 DV service providers (92 percent of all DV service providers in the country), 11 percent provided services to human trafficking survivors on the census day, while 72 percent reported to have served this population throughout 2016.¹⁵⁹ This is up from 2011 where only 7 percent of DV programs reported providing trafficking services on the census day and 58 percent throughout the year.¹⁶⁰

The inherent infrastructure and approach of DV shelters simply put them in the best position to meet a trafficking survivor's needs in the many places where trafficking-specific shelters are either full, or more often, simply don't exist. Beyond having the obvious education of the nuances of interpersonal violence, DV shelters also already have a unique understanding of safety concerns, confidential locations, and often provide the holistic services like therapy and case management needed by survivors of trafficking. The DV field has also been the trailblazer in developing the approach of trauma-informed residential services that have come to be essential for any individual escaping abuse.

However, some shelters who have not yet fully adopted voluntary services, or trauma-informed and culturally sensitive approaches may need to consider if their shelter framework, intended for DV survivors, may have adverse effects on any trafficking survivors in their care. For example, one sex trafficking survivor from a Polaris focus group explained her struggle in a DV shelter:

"When I got out of the trafficking I was put immediately by state patrol into a domestic violence shelter. It was the only shelter where I was from. I was their very first trafficking victim. So of course you put me with all these women who [were abused] by their husbands. [I was] a very different variety. Like, I couldn't sleep with the lights off. Of course I got myself kicked out because I couldn't function."

Additionally, while domestic violence shelters are much more likely to understand the nexus between sex trafficking and domestic violence, they are often unaware of the housing needs of labor trafficking survivors and their ability to serve this population effectively. Securing shelter for potential victims of labor trafficking, even if

their potential trafficker was an intimate partner, family member, or living within the same household, is still one of the greatest challenges that come through the National Hotline daily. Labor trafficking survivors often need the same trauma-informed services, confidential locations, and therapeutic approaches that DV shelters provide, but are unfortunately all too-often excluded in a DV shelter's scope of services. The National Hotline must then refer labor trafficking survivors to general population homeless shelters in the many areas where trafficking-specific services do not exist. One survivor of domestic work from a Polaris focus group explained how staying at a non-confidential homeless shelter eventually put her at risk:

"When I was in the homeless shelter my trafficker [found me] and called [the facility]. I have no idea how she found the number... So I believed her when she said "when you run, I'm going to find you and deport you."

Landlords and Residential Management Companies as Agents of Identification

The fact that potential traffickers often rent the residential properties needed for their businesses means that property owners, landlords, and management companies are often in a key position to help both identify potential victims and disrupt operations. Indeed, the Polaris survivor survey found that 56 percent of survivors had contact with a landlord or rental office during their trafficking, though it is unclear whether the actual commercial sex or labor was occurring at the residence where survivors had contact with rental agents.











The greatest potential of residential management companies and landlord identification lies within formal residential brothels. In some cases, they are actually on site and can see what is going on within these properties. In others, they are in a position to compare and draw conclusions from complaints by neighbors who likely have noticed suspicious activity. However, reports to the National Hotline from rental managers are relatively infrequent, and neighbors describing potential residential brothels often note that they have reported these indicators to their landlord or property management company, but have received no response to their report.

Private landlords are well-poised to recognize signs of potential trafficking at residential brothels, due to their proximity to the situation and ability to compare multiple complaints from neighbors.

These callers typically indicate that landlords or property managers were apparently uninterested in the report or claimed to be unable to do anything about the situation. The National Hotline has also received multiple reports of suspicious residential brothel activity from the same apartment complex, indicating that there may be a general pattern of landlords tolerating potential trafficking from these properties. However, in a minority of cases, landlords and property managers have called the National Hotline looking for resources and advice concerning specific units where these patterns of activity have been observed.

Potential Indicators of Sex Trafficking in Formal Residential Brothels

According to calls to the National Hotline, neighbors are significantly more likely to notice and report suspicious activity at a potential residential brothel, describing indicators such as:

-  Excessively high traffic of males in and out of the property
-  Apparent lack of freedom of movement for potential victims residing at the property
-  Evident monitoring of potential victims (e.g. security cameras installed)
-  Periodic rotation of potential victims
-  Signs of domestic violence or child abuse
-  Unusual amount of trash for the stated occupancy of the residence
-  Unusual entrance procedures by guests
-  Many taxis or rideshare drop offs and pickups by different guests
-  Many guests only visit for short increments at all hours
-  Residents rarely surfacing outside the home

One case that was discovered by a landlord, is the 2013 federally convicted case of U.S. v. Weston. In this case, prosecutors presented evidence that Linda Weston and members of her family, targeted victims with developmental disabilities and not only stole their Social Security benefits, but forced the victims into domestic work, commercial sex, and personal sexual servitude with each other. Up to six victims were starved, drugged, locked in an unfinished sub-basement, and subjected to abuse and neglect. Two died due to illnesses related to the abuse. According to court documents, several properties were leased by Weston in Philadelphia, PA, Norfolk, VA, and West Palm Beach, FL between 2001 - 2011.¹⁶¹ After one victim died in their Norfolk rental

which caused Weston to flee, that landlord filed a suit for alleged unpaid rent.¹⁶² According to one media article which interviewed the West Palm Beach homeowner, it wasn't until after the group moved out of the West Palm Beach home and the property owner reported \$50,000 in stolen property that he learned police frequently visited the home and discovered the squalid living conditions and lack of running water inside.¹⁶³ But ultimately, it was the Philadelphia landlord who was compelled to inspect the Weston basement after neighbors complained of frequent traffic, and after he noticed signs of unauthorized pets and needed repairs. It was there where he found four victims, one chained to the boiler, before calling police.¹⁶⁴



Housing & Homelessness Systems: Recommendations & Opportunities

For Federal and Local Governments, Private Foundations, and Individual Funders:

1. Increase Public and Private Investments into Housing and Shelter Programs

Polaris urges Congress and local governments to consider passing new legislation and expanding funding streams in existing policies that will subsidize and promote the creation of available housing, both for government housing, and in grants for private shelters. However, this responsibility does not fall squarely to government actors. Private foundations and individual donors should consider funneling their donations directly to programs which provide housing to survivors of all types of trafficking. This is an investment in the overall community. Furthermore, those responsible for writing grant requirements are encouraged to implement mandatory implementation of trauma-informed, voluntary services, and culturally sensitive modalities, as well as require awardees to accept survivors of all types of trafficking. With more available and affordable housing, especially for vulnerable populations who may be susceptible to being trafficked, traffickers will be less successful in luring people into human trafficking situations with the offer of housing.

2. Study and Replicate Innovative Local Housing Initiatives

Many cities and states have begun developing creative and resourceful housing initiatives to remove the housing barriers human trafficking survivors have faced. One example of an especially innovative approach is the housing pilot program for survivors of human

trafficking implemented by the Chicago Housing Authority, the Housing Authority of Cook County, and regional HUD and HHS offices. In 2016, several partners joined together, becoming the first in the nation to design a program to intentionally address housing issues for individuals experiencing homelessness and human trafficking. The program would offer 60 housing choice vouchers to eligible human trafficking victims over a period of three years.¹⁶⁵ Another strategic program is out of the North Dakota anti-trafficking NGO Youthworks. Using federal funds awarded in 2016, Youthworks began designating individual “host homes” for youth survivors up to age 22. Operating much like typical foster families, these host homes would undergo training, necessary background investigations, and be provided a monthly stipend to open their homes to temporarily host young trafficking survivors while more longer-term housing arrangements can be found.¹⁶⁶ These program models, and others like them, with proper evaluation, necessary funds, and refined lessons learned, could be useful for other communities to replicate across the country.

For Private Shelter Systems:

1. Publicize Housing Services for Immigrant Survivors of Human Trafficking

In 2016, three federal agencies, HUD, HHS, and the U.S. Department of Justice (DOJ), clarified to service providers who receive federal funding that providing services essential to protecting life or safety was paramount to the immigration status of the beneficiary. The detailed letter, which listed services that included housing, clearly stated that individuals must not be excluded on the basis of their immigration status.¹⁶⁷ Whereas service providers may have updated their

eligibility criteria to reflect this change, many callers to the National Hotline still indicate a lack of awareness of housing services available to human trafficking victims.

2. Domestic Violence Shelters Should Include Victims of Human Trafficking in their Target Population

When a trafficking-specific shelter is not available, domestic violence shelters, are the best suited out of any other institution to fill the gaps. Indeed, they provide the necessary trauma-informed services, confidential location, and safety considerations that trafficking and domestic violence survivors alike, desperately need. Although human trafficking victims may also fit into other populations, they are currently not included in the primary target population for many shelters whose focus falls under the general umbrella of domestic violence. While building up the housing capacity of trafficking-specific organizations is of course a great need, a more immediate response can be domestic violence shelters including sex and labor trafficking survivors in their target service population and accepting them more routinely. In fact, they are often already serving domestic violence survivors who have also experienced forced labor or commercial sex, without even knowing it.

In limited cases, funder requirements may limit a DV shelter's ability to accept human trafficking survivors. However, in most cases, it's simply due to discretionary policies, or an outdated institutional definition of domestic violence. Proper staff training on the nuances of human trafficking, coupled with the trauma-informed modalities that many DV coalitions already encourage, are generally all that is needed to adapt the shelter for the needs of a trafficking survivor. In shelters where these approaches have not yet been adopted, programs are encouraged to examine the benefits that they can have on both DV and trafficking survivors alike.

Adapting Domestic Violence Shelters to Integrate Human Trafficking Survivors

Below are just some considerations when attempting to adapt a shelter program designed for domestic violence survivors, to also provide service to human trafficking survivors. This is by no means a comprehensive list. In many cases, the foundational elements of fully voluntary services and trauma-informed and culturally sensitive approaches can be more than suitable and would also apply to the domestic violence survivors already served by the shelter.

1. Examine your agency's definition of domestic violence and if it could potentially be expanded. Many organizations limit their definition of "domestic violence" to violence perpetrated by intimate partners only. While this is certainly the case for many survivors of trafficking, it excludes most who may have been victimized by someone they identify as their pimp, a family member, or an employer. If funder requirements allow, whenever possible, consider expanding your agency's definition to a more expansive one that would include all forms of interpersonal violence.

2. Required employment. Many victims of trafficking do not have traditional employment histories or they may have criminal histories, which may prevent them from landing a job in the mainstream economy. Foreign national survivors can be without work permits and some labor trafficking survivors may find immediately returning to work extremely traumatizing due to their past experience. Consider alternative policies like encouraging school enrollment, ESL classes, or providing job readiness training.

3. Mandatory group counseling. Some DV programs require residents to participate in mandatory group counseling sessions. Some survivors of trafficking who have received services from DV shelters have reported feeling isolated and stigmatized by fellow residents since their entire experience is not shared and is often misunderstood among the DV survivors.¹⁶⁸ Being required

to openly share the details of their experience in a group setting can not only be triggering, but further alienate the survivor from the household and can make them question their choice to seek assistance. However, simply reverting to a voluntary services model, which is already a well-documented best practice in the DV field, could generally improve this issue.

4. Rejecting survivors with substance use histories. Although these policies are often well-intended and put in place for the safety of other residents, and to encourage healthy living, it is frankly unrealistic to expect some survivors to not struggle with the realities of substance use, especially when exiting a sex trafficking situation where an addiction may have been instigated and heavily managed by their trafficker. Even if the substance use was not a main part of their control, it has been well-documented that survivors of trauma typically use drugs and alcohol to self-medicate and disassociate from painful traumatic responses. Instead of disqualifying shelter applicants who have histories of substance use, consider partnering with local substance use disorder treatment programs to equip these residents with the treatment and support they need during their stay.

5. Required chores. Survivors of domestic work may find performing some household chores extremely triggering and re-traumatizing since they can often mirror the experiences of their servitude. While all residents of course should still do their part to maintain the cleanliness of their individual and communal areas, consider working with the survivor to identify chores that they feel most comfortable and able to perform. This is no different from the regular accommodations shelters often provide for individuals with physical disabilities.

6. “Locked down” facilities. Instituting “lock down” rules where residents are unable to leave the premises can feel like prison and can often mirror the isolation and confinement trafficking survivors were subjected to in their situations. This is of course applicable to many survivors of domestic violence as well.

7. Legal issues. Trafficking survivors, especially those with a precarious immigration status, can have complex and nuanced legal needs associated with their trafficking experience. If your agency does not have legal representation that specializes in these trafficking-related issues, consider collaborating with a nearby legal service provider who does. The online [National Human Trafficking Referral Directory](#) or the [Human Trafficking Legal Center](#) can help identify appropriate services local to your area.

Some other resources for domestic violence organizations looking to improve their services for trafficking and domestic violence survivors are below:

- [Serving Human Trafficking Victims: An Introduction for Domestic Violence Organizations](#) [National Human Trafficking Hotline]
- [Human Trafficking and Domestic Violence Fact Sheet](#) [Human Trafficking Legal Center]
- [Toolkit for Building Survivor-Informed Organizations](#) [National Human Trafficking Training & Technical Assistance Center (NHTTAC)]
- [SOAR to Health and Wellness Training](#) [NHTTAC]
- [How the Earth Didn't Fly into the Sun: Missouri's Project to Reduce Rules in Domestic Violence Shelters](#) [Missouri Coalition Against Domestic & Sexual Violence]
- [Creating Trauma-Informed Services Tipsheet Series](#) [National Center on Domestic Violence, Trauma & Mental Health]

1. Obtain Training on How to Identify and Respond to Human Trafficking on Properties

Rental management companies, apartment and town-home complexes, and individual landlords should commit to receiving comprehensive training to help them understand and detect possible human trafficking. Furthermore, real estate owners should require management companies they contract with to undergo training as a condition of their business. Rental management companies could be on the front lines to detect trafficking in residential brothels, domestic work, pornography, remote interactive sexual acts (a.k.a. “webcam houses”), personal sexual servitude, and a whole host of labor trafficking types where multiple victims may be housed together such as in agriculture, nail salons, factories, and restaurants. Trafficking isn’t just contained within residences, as rental management companies should also do their due diligence to make sure their vendors, especially those providing landscaping and commercial cleaning services, are adhering to ethical workplace practices.

64% of responding survivors to the Polaris survey reported losing their housing due to their trafficking or related abuse.

2. Support Survivors by Including Housing Protections in Lease Agreements (adapted from VAWA Reauthorization of 2013)

According to the Polaris survey, 64 percent of responding survivors reported losing their housing due to their trafficking or related abuse. Currently, all HUD housing programs require compliance with the housing protections for domestic violence, dating violence, sexual assault, and stalking, outlined in the 2013 reauthorization of the Violence Against Women Act (VAWA)¹⁶⁹, and many states have laws requiring private landlords to offer similar housing protections. Even if you are not affiliated with HUD and/or your state is not one of the leaders in housing protections for victims of crime, implementing some basic rights and protections into your standard lease agreements shows your tenants (and your community at large) that you stand up for survivors of violence. To ensure that all victims are protected, go one step further and explicitly mention survivors of human trafficking in all relevant clauses. If local laws allow, residential management companies and landlords can ensure that all leasing agreements include clauses such as:

- Protecting survivors from housing discrimination, eviction, or other punishment based on their status or history as a victim of crime
- Protect survivors’ right to call the police for emergency assistance
- Allowing a victim to break a lease without penalty with adequate documentation of their victim status
- Affording victims the right to have their locks changed, or other reasonable security enhancements
- Commitment to upholding any and all protection orders in place
- Ensuring complete confidentiality of all housing records and documented victim status

If you’re from a residential management company and want to learn more about working with Polaris, please contact corporateengagement@polarisproject.org

Glossary

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

Miscellaneous Terms

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

Miscellaneous Terms

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

References

Methodology

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

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

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

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

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

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

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

Social Media

8 Statistics are non-cumulative. Each potential victim can be recruited on multiple internet platforms.

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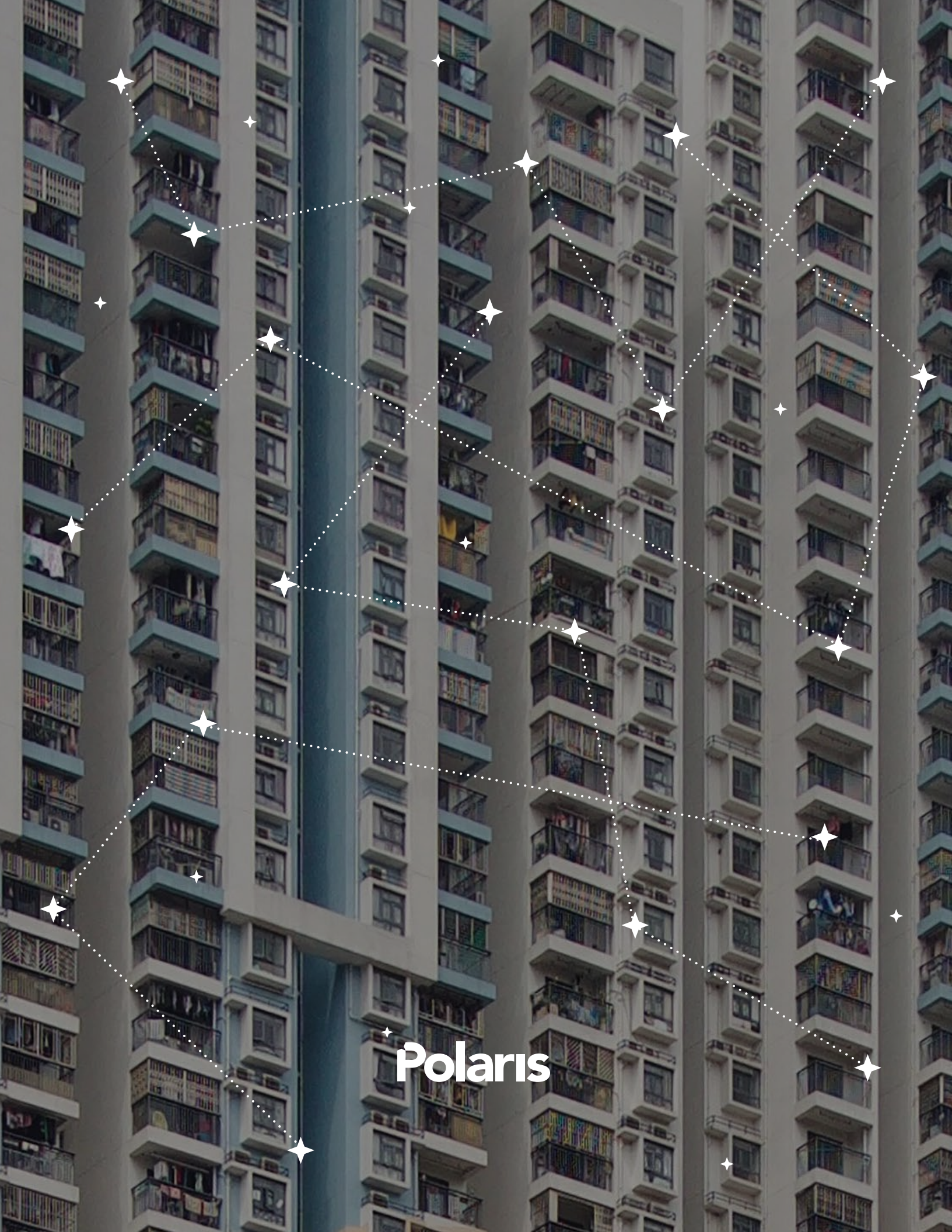
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