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Human trafficking and modern slavery in Europe's hotels

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## CHAPTER FOUR

# Human Trafficking and Modern Slavery in Europe's hotels

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Key themes:

Human trafficking and modern slavery

Hotel industry vulnerability

Active campaigning opposition

### **Introduction**

Human trafficking is a form of modern slavery, which involves moving victims from one place to another to supply slave labour or for purposes of sexual or other exploitation. Due to the nature of their operation, hotels are particularly vulnerable to being associated with both human trafficking and modern slavery. They provide accommodation with discretion which is often used by hotel for the hiring of an 'escort' during their stay and for traffickers to respond to this demand with their victims. They also employ several 'low-skilled' staff who are often immigrants or agency staff thus offering the opportunity for traffickers to deploy their slave labour force. Finally, they often host guests who are lucrative targets for criminal gangs and use their trafficked victims in to steal their valuables or obtain personal information that can be used for credit card fraud, identity theft or even blackmail.

Hotel operators may individually claim to work to ethical business practices and openly condemn human trafficking but may be caught up in these activities non-the-less. The potential for negative publicity and damage to a hotel's reputation are enormous, apart from any legal or criminal charges and operational costs that might be involved.

The chapter explores the nature of human trafficking and outlines the macro-, meso- and micro-level vulnerabilities that hotels face. It also explores examples and actions that can and are being taken by individual hotels and campaigns from within the hotel sector aimed at actively opposing all forms of human trafficking and modern slavery.

### **Human trafficking explained**

Human trafficking is a criminal activity which involves the transportation of people by coercion for the purpose of exploitation. It generates profits of an estimated \$150 billion globally from which \$99 billion comes from sex trafficking. Such profits render human trafficking the third most profitable criminal activity after arms and

drugs dealing. As well as sexual exploitation, forced labour, forced crime and forced marriage, human trafficking may also be for the removal of human organs, the sale of children, forced begging, and the recruitment of child soldiers. The 2018 Global Report on Trafficking in Persons produced by the UN Office of Drugs and Crime (UNODC, 2018:13) states that traffickers are using physical violence and coercion, but victims may also be trapped through abuse of vulnerability, power and deception whereas victims often find it difficult to speak out about their experiences because of fear, lack of trust or shame.

There can be some confusion between human trafficking and human smuggling. The European Union (2011) provides a useful definition of human trafficking:

‘The recruitment, transportation, harbouring or reception of persons, including the exchange or transfer of control over those persons, by means of threats or use of force or other forms of coercion, abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or the giving or receiving of payments or benefits to achieve the consent of person having control over another.’ (European Directive 2011/36/EU, Article 2)

Human smuggling is a similar criminal activity, but it involves the movement of people from one place to another of their own volition but without formal legal authority, typically to escape a dangerous or unsustainable location, or to improve their circumstances. They pay a fee to the smugglers to get to their desired location and, at an international level, they are illegal immigrants. So, the first difference between the two terms is the subject’s consent or the lack of it in the case of human trafficking. The second difference is the element of transnational movement, which is not always present in human trafficking, i.e., trafficked victims can be moved within the borders of a country. The final difference is the victim’s exploitation, again not an element of human smuggling. In essence, human smuggling is a violation against a state whereas human trafficking is a violation against a person. It is noteworthy though that smuggled individuals may eventually become trafficking victims.

The first stage in human trafficking is the recruitment phase, where traffickers typically prey on the most vulnerable. According to Europol (2016), the ‘lover boy’ (or Romeo pimp) approach is the most popular recruitment technique for sexual exploitation in Europe. The trafficker assumes the role of the victim’s boyfriend; however, there appears to be a high proportion of women who are traffickers, suggesting a ‘maternal’ or ‘girl-friend’ profile to the perpetrators. The key is that the trafficker presents a trustworthy character to the victim. The most prominent recruitment method for labour exploitation is through job advertisements in online as well as printed media (Guilbert & Cardi, 2018).

The second stage is the transportation phase which involves the movement of the victims from the one location to another. Albania, Bulgaria, Hungary, Romania, Slovakia, and Lithuania are the states of origin of trafficked victims from Europe. Brazil, China, Nigeria and Vietnam are the source of victims from outside Europe. Austria is the main transit country for victims from within Europe, whilst trafficked

victims from outside of Europe mostly pass through Hungary. Europol's database suggests over 70 per cent of victims in Western Europe were European citizens (IOM, 2016). However, as mentioned earlier, human trafficking does not always involve trafficking across borders. UNODC (2018) reports that since 2010 there has been a significant and steady increase in the share of victims within their own country's borders. This share has more than doubled over the last few years, from 27% to 58% in 2016. Cross-border trafficking demonstrates similar patterns to global migrant flow. Large numbers of people are escaping war-torn areas or escaping extreme weather events such as prolonged droughts, or for economic purposes and seeking to improve their lives by moving from poverty-stricken areas to more prosperous ones and often fall prey to traffickers.

The third stage involves the exploitation of the victims which takes the form of forced prostitution, labour, begging, criminality and marriage, domestic servitude, organ removal and illegal adoption (European Union, 2011). UNODC (2018) reports that in Western and Southern Europe 66% of the trafficking victims are for sexual exploitation, 27% for forced labour and 7% for the other forms of exploitation with most of the victims being females (52%) and one in every four victims being a child. While sexual exploitation is equally prominent in Central and South-Eastern Europe, forced labour cases are lower than the rest of the continent (17%) and other forms of exploitation (such as sale of children, trafficked pregnant women and girls for the purpose of selling their children, forced begging and forced crime) are more prominent (13%), especially in the Western Balkans and the Baltic countries. About 4 in 5 trafficking victims are females with the share of child victims – particularly girls – increasing, whereas the share of men is decreasing. Some countries in the region (Bosnia and Herzegovina, Hungary and Romania) report having more child victims than adults.

A significant number of human trafficking victims are exploited in the wider hospitality sector (hotels, restaurants, conference venues, coffee shops and bars) for both sex and labour exploitation as well as for other forms of exploitation such as forced crime, forced marriages and domestic servitude. This can happen through direct or indirect employment of trafficked victims (e.g., agency cleaning or maintenance staff) and by knowingly or unknowingly allowing trafficked victims to be exploited in their premises. Human trafficking and modern slavery can also be traced further back down the hospitality supply chain – on farms, food processing plants, distribution storage facilities or in linen, mattress and bed manufacturers (BBC, 2016; 2019).

### **Victim Recruitment Patterns**

Traffickers are usually targeting people who are in a vulnerable position and seek to take advantage by making themselves indispensable to them. Smuggled immigrants, for example, depend on smugglers to gain entry to a country and in most cases, they either don't have travel documents or are forced to surrender their documents to their handlers. From that point, the smuggler gains full control of their lives and can exploit them in any way they want. It is not uncommon, especially in South and South-East Asia, for destitute victims to voluntarily make a credit agreement with traffickers to

repay their debt through long-term ‘bonded’ labour and servitude. Many of these end up in more developed countries often offering sexual services in hotels, among other venues, or working in ethnic restaurants (Samonova, 2019).

In most cases of sexual exploitation, victims fall prey to traffickers either because they have an addiction (e.g., drugs) or because they are patiently groomed by their traffickers with which they start a relationship (as a good friend, guardian or lover). This relationship soon turns into an emotionally and psychologically abusive one, where traffickers use blackmail and violence to intimidate their victims into compliance. The dominant view is that traffickers using this recruitment technique, also known as ‘loverboy or Romeo-pimp technique,’ are male (Duncan & DeHart, 2019), but recent studies (McCarthy, 2019; Wijkman & Kleemans, 2019) have shown that female traffickers, often former trafficking victims themselves, are also prevalent.

The most common pattern of victim recruitment for labour exploitation in hotels and restaurants, according to the Gangmasters and Labour Abuse Authority - GLAA (2019) in the UK, are to lure them with online advertisements. Legal and rogue recruitment agency websites promote lucrative and well-paid jobs in the hospitality sector, normally without language requirements, work experience or specific skills. Victims normally must pay the agent a fee of hundreds of pounds to arrange employment and, quite often, the prospective employer to arrange accommodation and better working conditions. On arrival to their destination, they will open a bank account assisted by the trafficker who eventually keeps their bank card as well as their travel documents under the pretence of paperwork that needs to be done for the authorities. At the end of this cycle, the trafficker has full control over the victim.

### **Hotel Sector Vulnerabilities**

The US National Human Trafficking Hotline (NHTH, 2019) identified hotels and motels as the third more likely venue for sex-trafficking after spas and brothels, whereas Eurostat (2015) reported a growing use of forced labour in hotels. Although the data on specific cases of human trafficking in the hotel sector is sparse, an EU-funded research project on human trafficking in the European hotel sector conducted between 2014 and 2016 estimated that in the EU, on an annual basis, 93,480 sex slaves and 4,560 labour slaves are exploited in hotels while 12,540 labour slaves are exploited in restaurants (UWL, 2017).

Paraskevas and Brookes (2018a) research suggests that the hotel sector is vulnerable to being associated with human trafficking on three levels: macro-level, meso-level and micro-level.

#### *Macro-level factors (the wider social and business environment)*

Economic, political, legal and socio-cultural factors increase the opportunities for human trafficking since economic instability, war and political conflict have created the conditions under which more people are trying to escape threatening and difficult situations in their home countries in search of safer and a supposedly less threatening

life in more ‘developed’ countries. In the European Union, the removal of border controls to enable free movement of goods and labour has exacerbated the nations’ vulnerability to trafficking. A compounding political issue for European Union member nations has been a failure to develop a collective response to the growing refugee and migrant crisis. The opportunity to share out the responsibility to host migrants has been lost as a result of narrow self-interest in a political and cultural atmosphere of nationalism and victim-blaming, thus creating ideal conditions for exploitation of any form.

Fundamentally, the uneven economic performance resulting in different levels of average GDP per head and varying levels of employment and unemployment across EU member states creates the conditions for both legal and illegal labour migration. Many living in countries with lower levels of GDP and higher levels of unemployment are likely to want to move to those member states where economic conditions are better, and many of the smuggled migrants end up in falling prey to human traffickers as often the latter have got full control of their livelihoods even before they arrive in Europe.

Border control personnel are potentially in a position detect human trafficking, apprehend traffickers and support victims, yet in most cases their priorities are to act as border guards, policing the right to enter the country or zone (e.g., Schengen). They are not looking for victims of human trafficking. Even when documents suggest there is a case of illegal immigration, the rejected victims are likely to be deported and re-trafficked (Paraskevas and Brookes, 2018a: 2004).

As trafficking victims are normally low-skilled persons, they are used in the sex trade, agriculture, domestic or cleaning services, the sale of counterfeit goods and in begging. Many of them are employed in the ‘shadow economy’ whereby individuals work unregulated employment conditions, zero contracts and sham self-employment will often occur in beneath the ‘formal radar’ involving ‘cash in the hand payment’ as well as tax evasion and non-payment of employee health and insurance payments. All these informal arrangements breed the conditions for migrant labour exploitation by both human traffickers and unscrupulous employers.

Law enforcement in several countries has been proven inadequate in tackling human trafficking. Several interviewees in the Paraskevas and Brookes study (2018a), reported that it is not unusual for corrupt officials in the police force not only to allow human trafficking but to actively facilitate it by illicitly producing authentic travel documents for a fee. In other reported cases, they were collaborating with traffickers because they were part owners of hotels, bars or nightclubs offering sexual services or worked in these as security guards often offering offer ‘protection’ to these businesses by tipping-off their owners about imminent police raids and document checks.

Another dimension of law enforcement inadequacy is the failure of the justice system in convicting human traffickers. According to UNODC (2018), in 2016 in Western and Southern Europe less than half (41%) of the 4,513 investigated or arrested human

traffickers were actually prosecuted and only 7% (310) were convicted. In the same period, in Central and South-Eastern Europe, the conviction rate was almost 17% but the number of investigations or arrests was significantly lower – only 840.

Given that anti-migration rhetoric has been used by right-of-centre political parties to distract people from economic instability endemic to private capitalism (Wolff, 2012), there are substantial numbers of people in the receiving countries who lack empathy for refugees and asylum seekers. Chapter 5 in this volume points to a tendency for people suffering under the stresses caused by austerity and poverty to seek easy answers and someone to blame. Cultural obligations to be hospitable and to offer protection to the victims of circumstances beyond their control are swept aside as they ‘have bought upon themselves’ or are somehow unworthy of compassion (Paraskevas and Brookes, 2018b). In many cases, there has been a shift towards what is termed as ‘social normalisation of deviance’ that de-victimises those in exploited positions. In the UK for example, right-wing politicians and newspapers use words like ‘swarm’ and ‘invasion’ to describe people escaping dangerous places back home, looking for shelter and safety in the West. Surprisingly, even people in countries considered as ‘sources’ for human traffickers, e.g., Romania, display similar behaviours over ‘third world’ migrants (Euronews, 2020).

#### *Meso-level factors*

If macro-level factors create a general environment of economic, political and cultural factors that increase the flow of people who can be exploited by human traffickers, at meso-level, several hotel industry conditions enhance the vulnerability to trafficking for purposes of sexual and/or labour exploitation, primarily due to sector-specific structural and managerial priorities.

As a US hotelier once famously observed that the three essentials for a successful hotel business are ‘location, location, location’. This leads the industry to be characterised by multiple properties in a wide variety of locations. To co-ordinate an anti-trafficking strategy across the industry would involve potentially hundreds of companies of varying sizes, different types of ownership in a multitude of regions, countries, territories and continents. This lack of centralisation and the property diversity make hotels more attractive for traffickers and perhaps easier for rogue hoteliers to profit from any form of exploitation with their premises. Even within major groups, there are challenges in coordinating efforts across all properties.

Managerial practices and policies within the hotel sector also create problems for the fight against trafficking. The increase in ‘pro-consumption’ practices (Ritzer, 2017), whereby customers are increasingly required to provide elements of the services that they consume as, for example, self-check-in and check-out which limits contact between reception staff and guests, makes it more difficult to ‘police’ the profile of incoming residents. Sex-trafficking victims can be easily exploited in almost any regular hotel accommodation.

The hotel industry's labour-intensive nature also makes the sector vulnerable to trafficking, because the hotel sector requires a lot of labour in operational activities providing accommodation, food and drink. Whilst there are core skilled operative roles in kitchens, restaurants and bars, a large part of roles in a hotel require low-skilled labour, thus lowering the barriers for employment for both domestic and immigrant trafficking victims. Furthermore, since labour cost represents one of the most significant strands of total operating costs, several hoteliers seek ways of enhancing their margins by reducing the costs of labour. The uneven demand for hotel sector labour across the time of day, days of the week, months in the year, together with a culture of minimal labour employment terms and conditions, high labour turnover, low levels of training and limited trade union membership, all conspire to create labour demand patterns that can be met by agency staff or sub-contractors. Paraskevas and Brookes (2018a) suggest that the use of these alternative labour supply sources "have allowed certain hoteliers to interpret employment standards more flexibly, thus opening the door to all sorts of agents, who may very well be traffickers" (2018a: 2006).

#### *Micro-level factors*

In some ways, the need to be hospitable and meet guest needs has to be set within clear ethical and moral boundaries that are closely defined, monitored, and managed. As suggested above, this can become challenging when multiple properties are involved. Hotel businesses, as organisations might have fine ethical and moral codes of business practice but do these always result in ethical business practices? This is nowhere more starkly highlighted than in the provision of so-called 'escort services' for guests.

'Escorts' are normally professional sex-workers offering company and sexual services to customers and during their service journey, they use bars, restaurants and hotels. The culture of what happens behind closed guestroom doors is prevalent in the hotel industry where we often say that "the customer is king and service is his queen" (Mack, 2019). There are even some hotels that deliberately offer in-house escort services as a way of protecting guests. One hotel mentioned by Paraskevas and Brookes (2018b) said they adopted the escort recruitment approach after several 'cold departures', i.e., guests who died in their rooms as a result of excessive use of alcohol and drugs with prostitutes they brought to the hotel from the streets or after being mugged by them. However, there is a fine line between services willingly rendered by persons taking part in the sale of sex and sexual services offered by trafficked slaves through threat, abduction or other means of coercion (Flanigan & Watson, 2019). and hoteliers are not in the position to distinguish between the two. They, therefore, at risk of being accused as complicit with traffickers and of legal action by trafficking victims for "deriving profit and benefiting financially by providing a marketplace for sex trafficking" (Hodal, 2019).

Technology also adds to the sector vulnerability to human trafficking. Reservations made and then cancelled can be used to obtain tourist visas for trafficked victims. Smartphone use for remote check-in and checkout or even replacing guestroom keys

and key-cards limit the opportunities to spot the tell-tale signs of possible sexual exploitation taking place on the premises.

Despite the fine words and ethical business objectives, many organisations prioritise sales, cost management, profits and capital growth and managers, no matter what their personal views quickly learn the reality behind the words. Whilst the direct use of slave labour in European hotels might be a rare occurrence, the search for flexible labour, employed on minimal pay rates and zero-hours contracts, together with the use of sub-contractors to supply laundry, housekeeping, garden or building maintenance or other services create conditions for ‘neo-slave labour’ that human traffickers can exploit.

Business competitive models that fail to see labour as an essential asset in building a genuine competitive advantage over others also adds to the vulnerability to trafficking and exploitation. A business strategy that prioritised the qualities of hospitableness through the relationships built up with guests would treat employees as assets helping build customer loyalty. This would shift human resource management away from the low-cost labour markets drawn from poorer countries or domestic vulnerable population, towards a better trained, more highly rewarded and stable workforce.

### **Fighting human trafficking and modern slavery in the Hotel Sector**

The fight of the hotel sector against sex-trafficking and, more specifically, child sex-trafficking dates back to the early 2000s. Marilyn Carlson-Nelson, CEO of Carlson Companies (which include Radisson Blu, Radisson Red, Park Plaza, Park Inn, Country Inns & Suites and Carlson Wagonlit Travel) spearheaded the first sector initiative by signing the Tourism Child-Protection Code of Conduct (a.k.a. the Code), developed by ECPAT (End Childhood Prostitution and Trafficking), a non-profit organisation focused on ending the sexual exploitation of children. By becoming a signatory and a strong advocate of the Code, Carlson bound all businesses within the company to follow these guidelines, by which the company wrote a policy which made clear that they stand against exploitative tourism, all employees were given training with regards to perpetrators of child sex tourism, and customers were made aware of the penalties of such conduct. Marilyn Carlson-Nelson won a Trafficking in Persons Hero Award in 2004 -the first of many- for her ‘trailblazing’ work in combatting human trafficking (OMCTP, 2004). Since 2004, the Wyndham Worldwide Corporation, the Real Hospitality Group, and Hilton Worldwide have gone on to sign the same Code. In 2005, Carlson Companies also introduced a curriculum for more intensive employee training against sex-trafficking.

Following their commitment against child sexual exploitation, Hilton has brought sex-trafficking awareness also to the communities where it operates. By partnering in 2012 with Vital Voices, a non-profit organisation non-profit that works with women leaders in the areas of economic empowerment, political participation, and human rights, they co-founded the Global Freedom Exchange (GFE) programme to create anti-trafficking advocates in all Hilton hotel locations and to support them in

preventing and responding to human trafficking. Since its launch, Hilton has helped empower 127 anti-trafficking women advocates from 50 countries. Some of the GFE Fellows went on to be recognized as Trafficking in Persons Heroes by the US State Department, like Boom Mosby in 2017 and Francisca Awah Mbuli in 2018 (Hilton Worldwide, 2019).

As awareness on the issue of the multiple forms of human trafficking and modern slavery grew beyond sex-trafficking, major hotel industry players started to take a more comprehensive and proactive stance against this crime with both individual and cross-industry strategies. Marriott International, for example, in collaboration with ECPAT and Polaris, a leading non-profit that works to fight trafficking, developed a comprehensive training programme for hotel employees to learn and recognise the many indicators of trafficking and forced labour and how to respond if they come across a suspicious activity. The first wave of training aimed at 500,000 employees across all Marriott properties worldwide and was followed-up by the first-ever company's public service announcement on human trafficking labelled "A Million Eyes" (Tolentino, 2019).

Moving beyond training, Marriott recognised that job training that offers trafficking survivors (rescued victims) an opportunity for self-sufficiency and economic independence is vital to mitigating the risk of becoming re-trafficked and partnered with the Global Fund to End Modern Slavery (GFEMS) to design a job-readiness training curriculum aiming at developing hospitality industry for survivors (AHLA, 2019). Also, at the start of 2019, Marriott became the first hotel company in collaboration with Polaris to design and scale public-facing posters and signs that will build awareness on the indicators of trafficking - and how to contact the US National Human Trafficking Hotline (NHTH), if someone should recognise those signs (Polaris, 2019).

Hilton Worldwide developed a similar employee training programme in its online Hilton University, which is mandatory for all its properties regardless of whether they are owned, managed or franchised by the group. All operating and 'pipeline' Hilton hotels are mapped against human trafficking and other human rights risks and this information is embedded in all their operations and development processes. Putting also an emphasis in the group's interaction with suppliers, all Hilton Supply Management (HSM) team members are trained to identify, assess and mitigate risks of human trafficking and modern slavery in the supply chain. The company's Responsible Sourcing Policy, which includes anti-trafficking commitments on behalf of the suppliers, is distributed to all its suppliers and embedded in any new 1<sup>st</sup>-tier supplier contract. Procurement leads are being trained in risks of human trafficking and modern slavery in labour sourcing and a labour outsourcing agency audit programme is established to vet casual staff suppliers (Hilton Worldwide, 2019).

Hotel groups participate in several cross-industry initiatives against human trafficking and modern slavery. In 2018, for example, thirteen hotel groups came together in the International Tourism Partnership (ITP), a membership organisation providing a

platform for international hotel groups to discuss and address critical social and environmental issues through collaboration, to launch the ‘ITP Principles on Forced Labour’ (Manzoori-Stamford, 2018). These are three principles that reflect the hotel industry’s commitment for responsible recruitment and employment: every worker should have freedom of movement; no worker should pay for a job; and, no worker should be indebted or coerced to work. In 2019, Marriott and Hilton became part of a wider travel and tourism initiative, the World Travel & Tourism Council (WTTC) global taskforce aiming to assert the tourism industry’s zero-tolerance and share best practice against human trafficking (Jainchill, 2019). Alongside other founding members such as Airbnb, Amex GBT, Ctrip.com International, Carlson Wagonlit Travel, Emirates, Expedia Group, Thomas Cook and TUI, these hotel groups pledged to co-ordinated strategies in four areas: prevention (increase industry and consumer awareness); protection (train employees and travellers on how to identify and report suspected cases); action (encourage governments to enact legislation which recognises human trafficking as a crime throughout the entire chain and develop resources and support needed such as national hotline) and support (provide assistance, employability training and employment opportunities to survivors).

Although at a global level large hotel chains seem to be taking the lead in the battle, in the UK it is a smaller privately owned hotel group that sets the industry standard against human trafficking. Shiva Hotels Group, founded by former Lehman Brothers derivatives trader Rishi Sachdev, owns six hotels in London and is a prime example of a hotel group committed to abolishing modern slavery in the hotel sector and beyond. In 2012 the group founded Shiva Foundation, a non-profit organisation which works closely in partnership with individuals, businesses and communities to educate people across the UK hotel and hospitality industry on the context of human trafficking and develops practical solutions to prevent it.

Shiva Hotels Group does, in terms of Chapter One what is both good and legal. Their public statement - ‘Shiva Hotels - Our Commitment to Tackle Human Trafficking’ (Fig. 4.1) - appears on their website at [www.shiva.co.uk/modernslavery](http://www.shiva.co.uk/modernslavery) (as is required by the UK Modern Slavery Act) but it is also actively shared more broadly with business partners, corporate clients and interested parties. It is also displayed on a plaque in the lobbies and other areas, such as elevators and on guest room TV screens, in each of their hotels.

Figure 4.1: *Shiva Hotel’s anti-trafficking statement*

<p><b>SHIVA HOTELS - OUR COMMITMENT TO TACKLE HUMAN TRAFFICKING</b></p> <p>Shiva Hotels LLP is a hotel company with a collection of hotels around the UK. As a growing business, we strive towards running our business in a socially responsible way. This is core to our mission. We continually engage in dialogue with stakeholders across the industry and in government and civil society in order to reach collaborative solutions to some of the common critical social issues of our time.</p> <p>Our current commitment is to bring about an end to modern slavery and human trafficking within our organisation and across the industry.</p> <p><b>OUR INDUSTRY:</b> The hotel and hospitality sector employs 4.4 million people and contributes £143 billion to the UK economy. The UK National Crime Agency states that traffickers look for ways to</p>
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exploit this. Shiva Hotels believes businesses need to take a stand and play a leading role in addressing some of the key risk areas, including hotel usage and supply chains.

**OUR RESPONSIBILITY:** We accept that we have a responsibility to play a critical role in increasing awareness and taking what positive action we can to prevent this horrific crime.

*Source: Shiva Foundation*

The group has developed in collaboration with academics, expert anti-trafficking organisations and law enforcement the ‘Stop Slavery Blueprint’ (<http://www.shivafoundation.org.uk/blueprint/>). The Blueprint sets out a hotel anti-trafficking strategy with policies and standards to fight and prevent human trafficking and modern slavery within their operations and supply chains. These policies and standards help promote transparency and accountability but also cover areas such as risk assessment, business partner engagement, incident reporting, investigation and remediation and performance measurement to ensure that as much as possible is done to safeguard a hotel against human trafficking and modern slavery. Individual properties within Shiva’s portfolio have incorporated these into their internal policies and practices in a way that best integrates with their existing processes; however, they are mandated to adhere to the overall aim of the Blueprint.

Shiva identifies four major areas of risks to be addressed by their Blueprint: hotel usage; employment practice; supply chain; and, executive decision making. Hotel usage risks concern mainly the movement of trafficked victims through the hotel or the usage of guestrooms for sexual exploitation. Employment practice risks stem from the increasing hotel reliance on labour providers to employ outsourced housekeeping and cleaning staff, recognising that the layered structure of hotels combined with multi-tier recruitment systems may expose them to unscrupulous and difficult to detect practices. With regards to supply chain, Shiva acknowledges that certain goods and services combined with the complex network of producers, distributors and vendors can represent hidden risks in terms of worker welfare. Finally, there is the risk that without senior-level buy-in, policies will not be effectively implemented. The Blueprint provides guidance on effective prevention and mitigation of these risks.

In the heart of the Blueprint is employee training in recognising signs (‘indicators’) of human trafficking both in the hotel front and the back of the house. Shiva employees are asked to report to their head of department or manager on duty any indicators that lead them to suspect an instance of human trafficking and modern slavery in terms of guests using the premises for sexual exploitation or in terms of a fellow staff member being exploited. When these indicators are coupled with other reported indicators, the situation is becoming an ‘incident’ and the managers who are trained on how to handle such cases will take action as per the Blueprint guidelines. An important aspect of Shiva’s reporting protocol is that it is designed to be victim-centred with victims’ safety and wellbeing being paramount through any internal procedure.

With regards to the supply chain, all suppliers must comply with ‘Shiva Hotels Supplier Code of Conduct’ which defines both Shiva Hotels’ minimum standards and the basic principles of cooperation that are expected. The group has also been sharing their policies regarding human trafficking and modern slavery with all tier-one suppliers who have also been asked to complete a questionnaire for Shiva Hotels to understand their own position on the issue. For new suppliers, their response to the

questionnaire is considered before signing any contract. The group is also working proactively with suppliers to help them establish their own anti-trafficking initiatives and through the Shiva Foundation even offers awareness training and workshops. In relation to recruitment agencies, the group developed 'Guidelines for Establishing Terms and Conditions with Recruitment Agencies' by which prospective labour suppliers have to provide evidence of internal measures to combat human trafficking and safeguard labour rights.

The governance of Shiva's anti-trafficking strategy is undertaken by a cross-functional Anti-Trafficking Committee, consisting of the Anti-Trafficking Champions from each hotel (normally the general managers) and director-level representatives of human resources and operations, as well as executives. Shiva Foundation also participates and brings in its expertise on human trafficking and modern slavery and knowledge about new initiatives or changes in national policy. The committee meets bimonthly to track progress and report any ongoing challenges, patterns or concerns and is responsible for reviewing the annual self-assessment reports and industry benchmarks to recommend improvements and changes. Indicators and incidents are analysed with the help of the Metropolitan police and trends or areas where further intervention might be necessary are identified. The committee also assesses the hotels' reporting rates, and whether they are consistent or there is a drastic dip that might signify the need for further training.

Shiva's victim-centred approach does not stop with policies and procedures on spotting and reporting indicators and handling incidents. In 2018, they partnered with the Sophie Hayes Foundation, a charity supporting the re-integration of human trafficking survivors, to offer placements in their hotels. The partnership started with a pilot in one property and has now expanded to other hotels within Shiva's portfolio offering survivors placement experiences in departments such as kitchen, food and beverage, housekeeping and front office.

Shiva Hotels Group is an outward-looking company and, in collaboration with the Shiva Foundation, seeks to share knowledge, information and best practice in fighting human trafficking and modern slavery with the entire UK hotel and hospitality sector. In 2017 the group has founded the 'Stop Slavery Hotel Industry Network' (<https://www.stopslaverynetwork.org>) which brings together all industry stakeholders from individual hotels to hotel brands, hotel management companies, employment agencies and even construction membership bodies. Apart from being a platform of communication and practice sharing, the Network runs a resource hub with guidance that can help industry stakeholders develop their own anti-trafficking strategies. A prime example of the Network's outcomes is the first of its kind 'Framework for Working with Suppliers' which was developed based on members' experience and good practice (Shiva Foundation, 2018). Shiva Foundation has also been a catalyst in bringing the UK hospitality industry together with the Gangmasters' Labour Abuse Authority (GLAA) and develop an industry-wide communication and information sharing protocol aiming to protect hospitality employees from exploitation (Home Office, 2019).

## Conclusion

Human trafficking across European countries has increased over recent decades, in part driven by the wide gap between the more and the less developed economies. Changes from agricultural to industrial and the emergence of service economies lead to a combination of pull and push factors that have created mass population movements escaping bad conditions in their birth countries seeking a better life in the more advanced service economies. Increased flows of people into, and across, Europe have created opportunities for those willing to exploit the weak and vulnerable in the form of human trafficking and modern slavery.

The hotel industry is labour intensive and employs a significant number of routine unskilled labour thus creating opportunities for people to be exploited by human traffickers. Hotels are also used as the venue for sexual exploitation and few hotel companies are properly organised to identify sexploitation when it occurs. An additional dimension is the complex nature of hotel supply chains that include food production and manufacturing, textile and construction – all sectors highly vulnerable to human trafficking and modern slavery.

Clearly, Shiva Hotels Group has deservedly taken the title of ‘trailblazer’ from Marilyn Carlson-Nelson’s in the hotel industry’s fight against human trafficking showing that not only large players can affect the hotel industry as a whole. The hotel industry has taken significant steps forward since 2004 and there are many more initiatives by groups like Accor, Wyndham and InterContinental as well as smaller privately-owned companies that are not reported in this Chapter. However, many cynics would argue that these are just ‘baby steps’ lacking coordination and ‘tick box’ exercises’ taken only to safeguard the image and reputation of the companies involved. There is a need to understand and recognise very clearly the issue of human trafficking and the hotel sector’s vulnerability to it. One of the many challenges the industry is facing is understanding the depth of the issue. In the US, for example, the press tends to equate human trafficking with prostitution in general, ignoring the ‘slave’ parameter of the matter as well as all the other forms of exploitation involved in the term. In the UK, on the other hand, although there is a clearer picture of what human trafficking and modern slavery involve, there is a danger that any form of labour abuse (e.g., payment below national minimum wage) will be equated with modern slavery, thus diluting the real issue. There is still significant reluctance in taking decisive collective action, especially from broader professional bodies such as HOTREC, the voice of the hospitality industry in Europe that brings together associations from 30 European countries but also at a national level. The American Hotel and Lodging Association (AHLA) is perhaps a notable exception but US hotels have still a long way to go as they have to move their focus awareness training to comprehensive anti-trafficking strategies. The hope is that the combination of civil society pressures, changing legislative frameworks, corporate responsibility and common sense will continue pushing the industry in the right direction.

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