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H1 2026

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THE HUMAN TRAFFICKING THREAT LANDSCAPE IN HOSPITALITY AND AVIATION

— H1 2026 —



ICHARM

International Center for Hotel and
Aviation Resilience Management

Foreword from the Dean



Dr James Edmunds

Dean, London Geller
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This is the first edition in a new series from the International Centre for Hospitality and Aviation Resilience Management. It examines how human trafficking appears in the hospitality, tourism and aviation sectors across the first half of 2026.

The Centre built this series on a simple belief. The people who run hotels, restaurants, venues, tour operations and airports are among the few who can see exploitation as it happens, and they deserve intelligence written for the decisions they actually make. What follows is not an academic survey held at arm's length but a working document for general managers, corporate responsibility officers and risk leaders who carry a duty of care to guests, to workers and to the people moved through their premises against their will.

The Centre offers this report as a contribution to a shared responsibility

Note from the Lead Researcher

A word on what this report is, and what it is not. The report counts documented cases that have been recorded and appear in open datasets. It does not try to count every victim. The true number is almost certainly higher than any report can capture, because many cases go unreported or undocumented.

The reader should keep three things in mind when reading this report:

- The headline numbers come from enforcement activity and show where police and authorities focused their efforts as much as where victims actually were.
- Countries publish different amounts of case detail. ICHARM set up regional desks to balance out the large number of US cases in the data.
- Some countries did not release their data on time. The US system has declined significantly, with the J/TIP office cut by about 70 per cent and the national hotline handed to a new operator in December 2025. The US has not published 2025 statistics yet, and the UNODC global figures come out in November². The overall trend is reliable but the reader should be careful when comparing exact numbers.

A word on how cases are labelled over time. This is the first edition of a regular series, and incidents will be reclassified as events unfold, from alleged cases convicted when a court finds someone guilty, and downgraded if charges are dropped. Each change will be disclosed in the edition that carries it. Dozens of cases in this report are labelled alleged, and this label reflects their status at 30 June 2026, not a final conclusion. The coverage is thinner for Africa, the Middle East and much of Asia, which were analysed mainly through route-level and multilateral sources, and this limitation is stated plainly.

My hope is that the report earns its place on the desks of people who can act on it, wherever they operate.



**Prof. Alexandros
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Executive Summary

The first half of 2026 sent a clear message to senior leaders in hotels, restaurants, events, tourism and aviation. Human trafficking is now reaching these businesses as an operational, financial and legal risk. The standard of care expected of them went up across every major jurisdiction in just six months.

Seven findings stand out from this period.

1. Law enforcement targeted the people running hospitality businesses. Owners, managers and employees were charged or convicted on both sides of the Atlantic, from the Caxton Gibbet McDonald's convictions in the UK to owner and manager cases in US budget hotels. Prosecuting managers used to be rare. Now it is a pattern. The sentences got heavier this period, up to 32 years in one case involving hotels in Houston and Dallas.
2. Forced labour runs through subcontractor chains. The Ibis Styles Arnhem cleaning investigation in the Netherlands³⁰ showed how layers of outsourced cleaning contracts allowed exploitation to reach a branded hotel. The same thing appears in food service, event staffing and airline catering.
3. Forced criminal work inside scam compounds became the main new pattern, and it involves air travel. Victims are recruited online and flown out on genuine tourist visas. This means detection needs to happen at the check-in desk and boarding gate.
4. Large events attract enforcement, not proven numbers of victims. The World Cup and Super Bowl LX drove the biggest operations of the period. The evidence points to treating these as times of extra detection and extra funding, while keeping year-round controls in place.
5. The financial system put the sectors on notice. The FinCEN World Cup notice created a documented record that businesses had been warned, and FINTRAC did the same in Canada. That turned training and escalation records into a legal defence.
6. Regulation went in two directions. Anti-trafficking rules got stricter in the UK, EU, Canada and Australia, and put more responsibility on franchisors, platforms and brand head offices. At the same time, EU corporate due-diligence duties got lighter¹⁷. A new EU ban on goods made with forced labour starts in December 2027¹⁸ and this will affect hotels through their supply chains by making procurement teams share some of the exposure with the compliance teams.
7. Good detection now depends on spotting coercion, not commercial sex. A US court held that signs of commercial sex alone do not prove knowledge of trafficking. The same focus on control, confinement, held documents and fear appears in UK identification data, where labour exploitation is now the largest category of National Referral Mechanism referrals. Anti-trafficking training has to cover all these.

The practical message is the same across all sectors. Safeguarding comes first with a do-not-confront welfare-check protocol and a reporting channel that local management cannot block. Governance follows, and the best operators were those who could show what their staff saw and did through court-admissible records. How the industry is responding to trafficking can now be measured at a large scale. The industry training programme has been completed more than 2.6 million times since 2020. Marriott has trained more than 1.7 million employees over the past ten years³. The No Room for Trafficking Survivor Fund ran a cycle worth up to 800,000 dollars. These numbers give organisations a way to compare their own efforts against industry standards.

Beyond these findings, the report is designed for practical use. It offers sector-by-sector risk profiles, a directory of reporting contacts for the UK, the US and other jurisdictions, a view of what the second half is likely to bring, and a short set of priority actions for each role, from general managers to risk and CSR leads. It closes with a set of reference appendices, including a list of free training resources that managers can give to staff this month.

1. The Operating Picture, H1 2026

The first half of 2026 generated a large number of cases, operations and regulatory changes across hospitality, tourism and aviation, spread across many countries. The timeline below brings together the publicly reported events that are relevant to the sector. It records what was documented and the patterns that emerged, not the total number of victims. A few World Cup figures that were announced in early July for June activity are noted as such.

Date	Development	Sector / note
1 Jan	Rhode Island hotel and short-term-let training law takes effect ²¹	Accommodation, regulatory
9 Jan	SFO and PHL airport training mandates announced	Aviation
15 Jan	Red Carpet Inn owners arrested, Dumfries VA (alleged)	Accommodation, owner complicity
23 Jan	Trafficking Survivors Relief Act signed; Op Laggenend convictions (UK)	Policy; restaurants recruitment
6 Feb	Ibis Styles Arnhem housekeeping case exposed (NL, alleged)	Accommodation, subcontracted labour
8 Feb	Super Bowl LX task force, 29 arrests, 73 survivors	Events
10 Mar	Operation New Girl (Brazil); ICA-MOM F&B raid (Singapore)	Tourism recruitment; restaurants
18 Mar	CSDDD Omnibus I enters into force, due-diligence scope narrowed ¹⁷	Cross-sector, regulatory
31 Mar	Keller v Extended Stay America dismissed (D. Utah)	Accommodation, civil litigation
11 Apr	Mexico Senate resolution on hotel ID checks for minors	Accommodation, policy
20 Apr	Quintana Roo bar raid, 36 women freed (alleged)	Events / nightlife
4-8 May	EMPACT administrative Action Days target restaurants and hotels, 19 countries	Restaurants, accommodation
11 May	FinCEN Notice FIN-2026-NTC1; Georgia SB 570 passed ²⁰	Cross-sector, regulatory
28 May	Omaha AmericInn employee sentenced to 10 years (convicted)	Accommodation, employee complicity
4 Jun	McDonald's Caxton Gibbet forced-labour convictions (UK)	Restaurants
8-12 Jun	Operation Global Chain, 1,024 arrests, 2,070 victims, 59 countries	Aviation nodes, cross-border
11-30 Jun	World Cup group stage, host-city enforcement surges	Events, accommodation, aviation
26 Jun	EU Forced Labour Regulation guidelines adopted; German Bundestag first reading ¹⁸	Cross-sector; demand-side liability
30 Jun	UK Modern Slavery Act amendments introduced; Spain LatAm network dismantled	Policy; tourism recruitment

Two significant results were announced just after the period. Operation Red Card in Atlanta reported 153 arrests and 54 people rescued on 21 July, and Operation Mirani sentencing, for child trafficking by air on false documents, landed on 10 July.

What changed in the first six months of 2026

This period saw enforcement go after the people running hospitality businesses on both sides of the Atlantic. In the UK, Jan Drevenak and Monika Olahova were convicted and jailed on 4 June for trafficking a Czech man into 12-hour shifts at the Caxton Gibbet McDonald's^{6,46}. This was the final trial of the Slavery on the High Street network, which exploited 16 victims. In the Netherlands, the Labour Inspectorate opened a criminal trafficking investigation into the Ibis Styles Arnhem, where around 20 cleaners were allegedly paid 3.50 to 4.50 euros per room through a chain of German subcontractors³⁰. In the US, a

Virginia motel's owners were charged with taking a cut of on-site prostitution⁸, an Omaha employee was convicted for trafficking minors, and a Los Angeles manager was indicted for depositing over 64,000 dollars in known trafficking proceeds¹⁰. Prosecutors used to go after the traffickers or the frontline staff but this first half of 2026 they are going after the management of the businesses. This is becoming a pattern and it is not just a one-off.

The period also brought the heaviest individual sentences recorded so far against traffickers operating through hospitality premises. Cristian Morris was sentenced in June to 32 years for trafficking teenage girls at hotels along Houston's Bissonnet corridor and Dallas's Harry Hines Boulevard¹¹. The Stadium Inn manager was indicted as part of a 65-count federal case against the Figueroa Corridor operation, which listed 51 victims. In New Jersey, thirteen people were charged in a Route 73 motel-corridor ring that officials linked to the upcoming World Cup¹². Sentences and charges at this level change how every hotel on a known trafficking corridor thinks about legal risk. The cost of getting this wrong is now much higher.

FinCEN, the US financial intelligence agency, issued a notice on 11 May warning that trafficking risks increase during the World Cup. The notice does not impose new legal duties, but it creates a record that hotels, transport operators, staffing firms and booking platforms were told about the risk. If a company later faces legal action, it cannot easily say it did not know. Evidence that had constructive knowledge of foreseeable event-period risk. Training records and escalation logs used to be about good practice but now can also be used as legal defence in a court of justice.

The biggest enforcement operations of the period happened around major events like the World Cup. Commanders and academics agree that these numbers show a surge in enforcement activity, not a proven increase in the actual number of victims. For businesses, the message is that events like this create opportunities for detection and funding, but they do not necessarily mean that victim numbers are going up.

Regulations

Regulation went in two opposite directions. On one side, anti-trafficking rules got stricter. The EU Anti-Trafficking Directive had to be adopted by member states by 15 July, and it introduced a new offence for knowingly using services provided by victims. Germany moved ahead with its own bill, which had its first reading on 26 June and extends criminal liability to all forms of exploitation, not just sexual exploitation. On the other side, corporate due diligence rules loosened. The EU's Corporate Sustainability Due Diligence Directive was watered down by the Omnibus I package in March¹⁷. Its scope was narrowed, its application was delayed to July 2029, and the harmonised civil-liability regime was entirely removed. The EU Forced Labour Regulation also moved forward, with implementation guidelines published on 26 June¹⁸. The product ban starts on 14 December 2027. This affects hospitality and aviation through goods they buy, like linens, uniforms, food and amenities, because services are not covered by the regulation. In the UK, the government proposed the first major amendments to section 54 of the Modern Slavery Act. Fines could go up to the greater of 1 million pounds or 1 per cent of turnover. The Gangmasters and Labour Abuse Authority (GLAA) was abolished and folded into a new body called the Fair Work Agency.

Different states in the US also brought in their own rules. Georgia's SB 570²⁰ came into effect on 1 July and extends training requirements to inns and short-term rentals, sets out how long records must be kept and introduces penalties for non-compliance. Rhode Island's law has been in place since January and requires training records to be kept for the whole duration of employment, plus another year after termination. If the Department of Business Regulation asks for them, companies have ten business days to submit them²¹. Pennsylvania's HB 1286 is a first in the US that requires third-party booking platforms to check that operators have done their training, with fines if they do not. Massachusetts' H.4360 covers signage and approved training and passed the House but is still waiting in the Senate. The rules on how often training needs to be repeated, how long records must be kept and how quickly companies need to submit them now vary from state to state. Multistate operators need a compliance system that tracks each jurisdiction's requirements individually and cannot rely on one national standard.

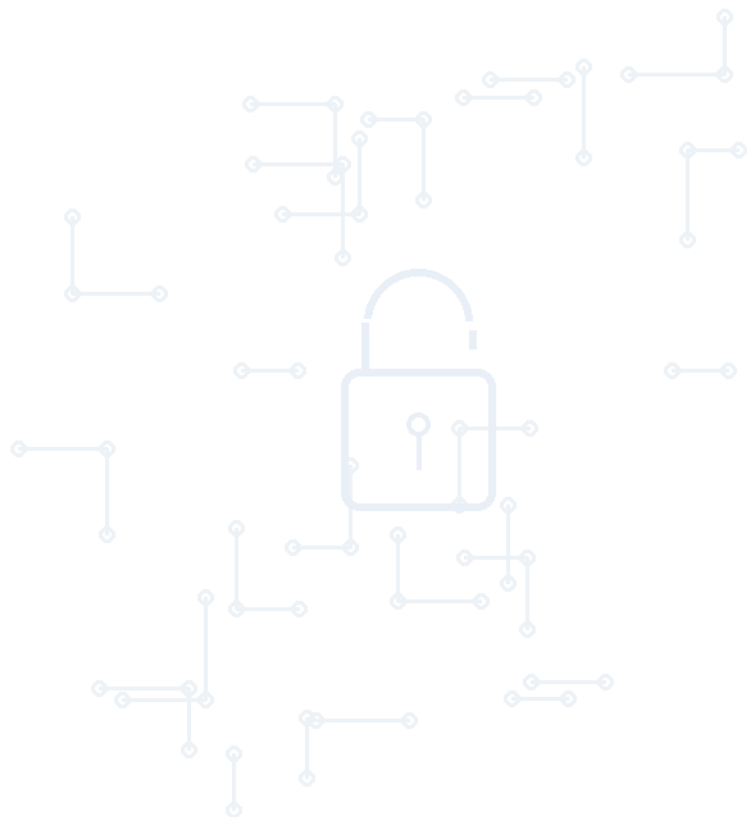
In Asia-Pacific, Australia announced in July that companies with revenue above 100 million Australian dollars will face fines and criminal liability if they fail to prevent modern slavery²³. This announcement came just after the period closed.

Patterns

The main new pattern this period was forced criminal work inside scam compounds, and it involves air travel. Victims are recruited online through fake job adverts on social media and flown out on legitimate tourist visas. That means airlines now have to spot signs at check-in and the boarding gate, just like hotels have to spot signs in rooms.

It is noteworthy though that the 2026 US Trafficking in Persons Report has not been released. The national hotline changed operator, transferring from Polaris to Compass Connections on 8 December 2025, so there are no 2025 statistics published and there have been concerns in the Senate that information on traffickers might not be getting passed on properly. The global UNODC dataset is not due until November², so while the overall trend direction is reliable, any precise comparisons involving US data come with a confidence caveat.

The report leans heavily on US data. That is not because the US has more trafficking but because US agencies publish more detailed case information than most other countries, which only release annual numbers. Appendix C gives a fuller international picture to help put the US figures in context.



2. How Exploitation Manifests Across the Sectors

Exploitation in hospitality, tourism and aviation does not appear as one event that anyone can spot but as a pattern that staff and systems can learn to read. The record for the first half of 2026 shows the same forms, the same entry points, the same indicators, some of which now appear in regulator guidance. This section explains how exploitation happens, so the sector profiles that follow can be seen from a common perspective.

How indicators are read depends on who the victims actually are. In the EU's 2024 registered data, 63% of victims were women and girls, and sexual exploitation accounted for 46%, above forced labour at 37%, although the labour share keeps rising²⁶. A training programme built around the sex-trafficking stereotype will miss more than a third of what the record shows.

Three roles a property or service plays

Three operational roles emerged from the cases in this period, and each one changes what controls will work.

The first role is the property as an exploitation site, where the business is used without the knowledge of head office or brand. Budget and economy accommodation dominated this category. Every publicly identified United States accommodation case in the period involved independent motels, economy chains or midscale extended-stay, with no luxury or upper-upscale case surfacing, almost certainly a detection and litigation artefact rather than evidence of absence²⁷.

The second role is complicity by owners, managers or staff. This was the defining feature of this half of 2026. In Virginia, motel owners allegedly took a cut of on-site prostitution and warned the occupants about police activity⁸, an Omaha employee used till money to buy sex with a minor victim, and a Los Angeles manager was indicted for depositing trafficking proceeds⁹. Australia gave the region's clearest live hospitality case, with two owners of a Manly West restaurant prosecuted over alleged forced labour and debt bondage tied to an AUD 60,000 visa-sponsorship debt placed on a worker²⁸. Property-level controls cannot survive owner or operator involvement, which is why anonymised reporting channels that bypass local management, together with brand quality-assurance audits, are the only layer that holds.

The third role turns the property into a recruitment or assault site, reached through fraud. Fake modelling and hospitality jobs brought victims to hotel rooms, where coercion followed²⁹. The room played a minor part to a deception that began online.

Labour exploitation runs through subcontractor chains

The half's flagship hotel labour case came from Continental Europe. Around twenty cleaners at the Ibis Styles Arnhem were allegedly paid between 3.50 and 4.50 euros per room, funnelled through a three-tier German subcontractor chain, and the Dutch Labour Inspectorate opened a criminal investigation³⁰. In European hotels, layered cleaning subcontracting is the main mechanism that keeps labour trafficking out of sight. The red flags are piece rates per room that fall well below the cleaning collective agreement, workers with no direct contract, and subcontractor chains that cross borders.

Food service and event staffing show the same layering. Aviation-catering workers gave testimony about wage theft and retaliation, which shows how staffing-agency layers inside supply chains keep the exposure hidden from the brand at the top³¹.

The Asia-Pacific enforcement showed the same pattern from the immigration side. Singapore's ICA and MOM raided food-and-beverage premises on 10 March and arrested 11 overstayers with two employers under investigation. MOM confirmed food service as the country's leading sector for phantom workers³². For operators, this means trafficking due diligence has to reach cleaning, security, catering and banquet subcontractors and cannot stop at direct employees.

Recruitment lures, scam compounds and the aviation link

A job advert promising immediate hire, high pay and paid travel was the standard recruitment lure of the period, spread through social platforms and messaging apps¹³. That same lure led to two different

destinations. One was conventional sexual and labour exploitation. Colombian women were recruited with fake hospitality jobs, given tickets and hotel bookings so they could pose as tourists, and then exploited in Spain³³.

The other destination was forced criminality inside South-East Asian scam compounds, which is the first half's defining new pattern. Recruitment ran through fake job adverts on Telegram, WhatsApp and LinkedIn, and victims were flown out on legitimate tourist visas. One documented route carried 24,922 travellers, with 3,312 unreturned and around 80% travelling on tourist visas³⁴. Brazil showed the same corridor from the origin side. The Federal Police 'Operation New Girl' dismantled a network that recruited Brazilian women through social media for sexual exploitation in Europe, seizing around 4.7 million reais. Separately, Brazilian victim data now record Cambodia as the top destination for forced criminality, with 44 of 84 victims in 2025³⁵. This puts recruitment-side indicators at the check-in desk and boarding gate. One-way tickets on tourist visas, escorted young travellers and inconsistent employment accounts should now matter to airlines the way room-level indicators matter to hotels³⁶.

Several changes reshaped the digital side of these crimes during the period. A temporary EU rule that allowed online platforms to scan voluntarily for child sexual abuse material ended on 3 April. With that rule gone, platforms in Europe can no longer check for this material, leaving a gap that did not exist before³⁷. Reports of financial sextortion passed 50,000 at the National Center for Missing and Exploited Children. The WeProtect Global Alliance logged a 1,325% jump in reports involving AI-generated abuse material and cautioned that technology-facilitated exploitation now moves faster than the safeguards designed to catch it³⁸. Accommodation providers and intermediaries now have a second detection layer to work with. Alongside what staff notice on the floor, advertising, messaging and payment data can also reveal what is happening. How far platforms may lawfully go in detecting this material varies widely from one jurisdiction to the next.

Mega-events concentrate activity, not necessarily incidence

The World Cup and Super Bowl LX created the two largest enforcement surges of the half. Enforcement commanders, academics and NGOs all agree that these figures reflect a surge in enforcement activity, but there is no study that has shown that trafficking itself rises during mega-events¹⁵. Operators should therefore treat these events as periods of system stress and system building, while keeping their usual controls in place all year. The people exploited around these events did not need an event to be exploited³⁹.

Reading indicators, coercion first

One lesson from this period that stands out for training is that signs that suggest commercial sex do not, on their own, prove trafficking. A United States court dismissed civil claims where observations consistent with commercial sex, such as lobby meetings, multiple clients and requests for extra linen, did not by themselves show knowledge of force, fraud or coercion⁴⁰. Training should therefore teach staff to look for signs of coercion instead. These include one person controlling another, confinement, keeping someone's documents and fear. Commercial-sex markers alone are not enough. This matters for detection quality, and it now shapes where defences are being tested in court.

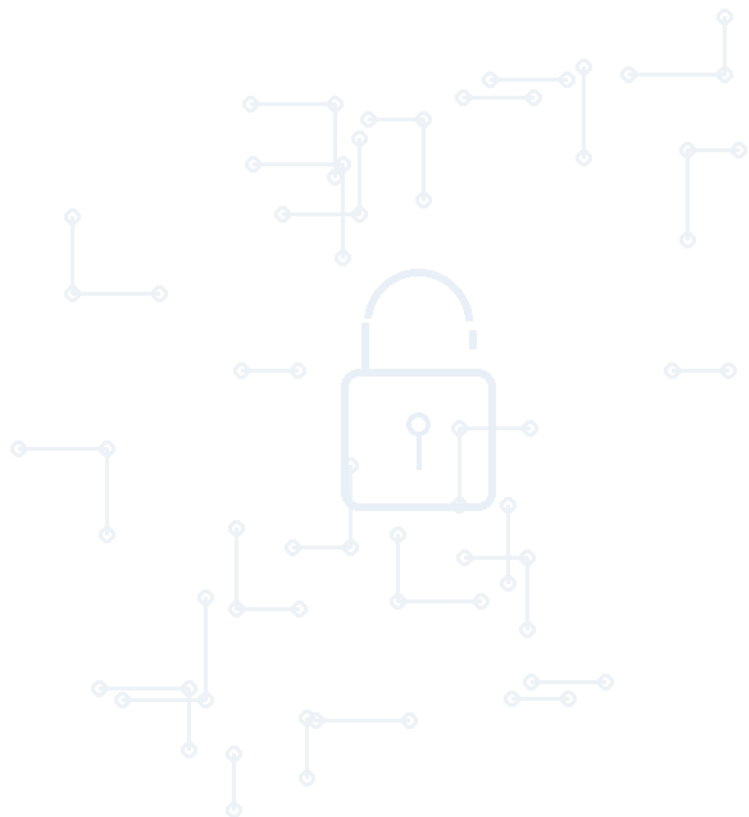
Four families of indicators recurred across the period.

The first covers booking and payment. Examples include cash-only nightly payment, stays renewed one night at a time, and refusal to pay incidental deposits⁴¹. The second covers how rooms are used. Multiple visitors at all hours, very little luggage and guests who are not allowed to leave fall into this group. The third covers behaviour. A controlling companion who holds the documents and speaks for the guest, visible injuries, rehearsed accounts and guests who cannot produce their own identification all belong here. The fourth covers money. The FinCEN notice points to wages paid and then transferred out straight away, bulk prepaid cards and deposit-then-withdrawal patterns across different locations⁴². Document fraud emerged as another marker, this time from African border policing. An inter-agency profiling model helped Kenyan officers in Nairobi stop two attempts involving forged travel documents. Operation Global Chain recorded 80 document-fraud detections across its checks⁴³.

Not all indicators have the same weight, and staff should be trained to know the difference. The strongest are those that appeared in this period's verified prosecutions, and the operations and regulator red-flag

lists. A guest who does not control their own documents is one. A controlling companion who answers for them is another. So is cash-only nightly payment with repeated extensions, workers moved as a group by one handler, and wages paid then transferred straight out. Weaker signs, with minimal luggage the clearest example, have a high risk of false positives and should never trigger action on their own. When coercion markers are weighted above commercial-sex markers, and strong indicators above weak ones, the reporting channel stays credible, and training aligns with what the courts now expect. The Keller case made this clear⁴⁰. A US court dismissed trafficking claims against hotel operators because the evidence showed only signs of commercial sex, such as lobby meetings and requests for fresh linens, without anything to show force, fraud or coercion. The court ruled that commercial-sex observations alone cannot establish that a hotel knew about trafficking. The training therefore needs to focus on coercion markers, because escalation based only on commercial-sex signs will not hold up in court and will undermine the credibility of the reporting channel.

One rule applies to all four families. When staff see a red flag, they do a welfare check and escalate internally. They do not confront the person and they never accuse anyone.



3. Sector Risk Profiles

Each profile explains how the sector showed up in the first half of 2026. It covers the exposure the sector carries, gives that exposure a rating, and closes with a short note on what it means for the reader who runs or governs one of these operations. When this report uses the word exposure, it means the volume and pattern of documented trafficking that touches a sector. It does not mean how many victims there are. Appendix A collects the enforcement operations behind these profiles and Appendix B presents the participation routes for acting on them.

Hotels and Accommodation

Hotels were the most case-dense asset class this period, and they appeared in three different roles as we have already seen in Section 1 of this report: as an exploitation site with management complicity¹⁰, as a labour-exploitation

Budget and economy accommodation, along with midscale extended-stay properties, accounted for all the cases. Nothing was reported at luxury level, which probably says more about detection patterns than about what actually happened. Short-term rentals had no public case during the period, even though plaintiff firms are actively developing platform liability theories. This space is worth watching⁴⁴. The period also turned up a quite interesting negative finding. Twenty-four targeted searches did not identify any story of a hotel employee tip that individually rescued a victim. The industry cannot yet show that its detection outcomes match the scale of its training²⁷. Hotel-based sex-trafficking casework, apart from the U, also appeared in Continental Europe. Operation Global Chain included an Upper Austria case, and Spain's 2025 national balance recorded 1,869 victims freed across 6,775 inspections⁴⁵.

RISK: HIGH

Across every sector in this report, hotels generate the richest and most commercially valuable data, and what matters most now happens away from the property itself. The sector is at the top of the table because complicity by owners and managers leads at the top, along with civil litigation that is already active and a FinCEN on-notice environment that adds further pressure. The front desk, meanwhile, has become a target in its own right.

What this means for you

Property-level controls fail when owners or operators are complicit, so a reporting channel that bypasses local management and keeps the reporter anonymous and brand quality-assurance audits work much better. On known corridors, night-audit and revenue data can reveal the economics of trafficking. Staff training should focus on coercion markers such as control, confinement, document retention and fear as commercial-sex markers on their own are not enough evidence. Training completion should be documented for each employee, because training records now serve as a defence in litigation.

Audits only become actionable when they have specific targets. For example, audits in the US should target the many corridors that stood out this period such as the Houston's Bissonnet and FM 1960 corridor, Los Angeles' Figueroa Corridor, Dallas' Harry Hines Boulevard, and New Jersey's Route 73 motel corridor¹². A portfolio should map its own properties against documented local corridors in the same way. Record-retention rules differ from jurisdiction to jurisdiction (and country to country), as explained in Section 2 therefore training records should be kept to the longest standard that applies.

Restaurants and Food Service

Outside the United States, the first half's most consequential criminal restaurant conviction came from food service. As already discussed in Section 2 On 4 June, Jan Drevenak and Monika Olahova were jailed for forcing a Czech man into 12-hour shifts at the Caxton Gibbet McDonald's^{6,46}. That case closed the Slavery on the High Street network, which had exploited 16 victims. Asia-Pacific supplied the immigration-side picture. Singapore's ICA and MOM raided food-and-beverage premises on 10 March, and MOM

confirmed food service as the country's leading sector for phantom workers⁴⁷. In Australia, the Manly West restaurant debt-bondage prosecution continued through the period²⁸.

In the United States, the activity was more administrative than criminal. There were no new federal forced-labour restaurant cases. Food service still held its place as the most wage-violated industry, and one action recovered US\$77,523 for kitchen workers who had been paid flat salaries in Austin⁴⁸. Payroll and subcontracting have all the exposure here.

Across 19 countries, EMPACT Action Days targeted criminal infiltration of restaurants and hotels⁴⁹. The same period brought record UK sponsor-licence revocations and illegal-working raids on takeaways, with GRETA naming hospitality as high-risk⁵⁰.

Italy gave the clearest labour-side warning in Europe. The ADIR-FLAI report placed restaurants and tourism accommodation among the 'hidden' exploitation sectors (ADIR stands for Altro Diritto, an inter-university research centre, and FLAI is the Italian Federation of Agroindustrial Workers, a trade union). It recorded 34 detected cases, none of which faced charges under the 'Caporalato' article. This article, Article 603-bis of the Italian Criminal Code, covers illicit intermediation and labour exploitation, and it applies when workers are recruited or employed under exploitative conditions while taking advantage of their state of need. Since no cases were charged under this provision despite detected exploitation, it is evident that in Italy there is a systematic under-prosecution. A national labour-inspection campaign ran from June through September across seasonal work that overlaps tourism⁵¹.

RISK: ELEVATED Courts abroad have delivered strong labour-side convictions, and wage enforcement in this sector is heavy. Civil litigation here is less intense than in accommodation. Payroll and subcontracting carry the exposure. Joint-employer liability is the most serious risk on the record, particularly for outsourced kitchen and cleaning labour and for banquet staff.

What this means for you

Operators already hold the labour-trafficking indicator they use least, and it is wage-compliance data. Quarterly exception reports should cover several patterns. Flat-salaried kitchen staff whose hours do not add up are one. Tip-pool composition is another, along with workers who share bank accounts or addresses. A fourth pattern is wages paid and then transferred straight out. Supplier vetting should reach dishwashing, cleaning and banquet subcontractors. Joint-employer liability stays with the operator, because staffing agencies do not take it on.

Training should run on two tracks, one for managers and one for line staff. Managers need due diligence on recruitment channels and an understanding that retaining workers' documents is prohibited. They also need the skill of receiving a disclosure, which means listening to someone who says they are being exploited without challenging their account, promising what cannot be delivered, or compromising a future police investigation. Behaviour recognition is what line staff need. One generic course for everyone will not teach disclosure reception, and the evidence shows that this skill is different from the rest and very important to have.

Events, Conferences and Large-Scale Gatherings

As discussed in Section 2, the period was dominated by two mega-events. The World Cup drew the largest coordinated anti-trafficking effort ever tied to a sporting event, and it also sparked a serious debate about what the numbers actually mean. At Super Bowl LX, 73 survivors were recovered and 29 alleged traffickers arrested, though the task force commander admitted he could not tell whether trafficking itself had risen or enforcement had simply intensified⁵².

Preparation across host cities varied widely. At kickoff, four of the eleven United States host cities still did not have final human rights plan, and the rest published theirs only days before⁵⁴. Some models are worth mentioning because they show how event contracting can work elsewhere. Houston, Kansas City and Dallas built Responsible Contracting Policies with worker-support hubs into their tournament human-rights plans. Toronto ran its plan through the Canadian Human Trafficking Hotline, whereas Vancouver committed around 200,000 dollars to community outreach and patrols⁵⁵. Mexico ran a campaign called

'Mundial Sin Trata' which directed hotel and airport staff, along with tourism workers, to a national reporting line. The campaign pointed out that Germany 2006 saw no spike in trafficking, which supports the prevention based on evidence rather than alarm⁵⁶. The UK Independent Anti-Slavery Commissioner was the analytic frame for how demand shifts during event-period staffing⁵⁷. Operators who want a direct way to take part can join the largest-ever *It's a Penalty* campaign, whose partner list appears in Appendix B⁵⁸.

RISK: ELEVATED Enforcement visibility is high in this sector, and policy activity is heavy, with recruitment-fraud exposure concentrated around the event-period staffing. The evidence supports treating mega-events as windows for detection and for building systems, and not as proven surges in victim numbers.

What this means for you

Treat a mega-event as a stress test and a chance to build systems and keep your ordinary controls running through it. The idea that a mega-event rises victim numbers is not supported, so there is no reason to plan around it. The real change is the staffing with temporary workers coming in fast and in large numbers, and this surge is where the risk is. Run the same recruitment checks on them that you would run on anyone you hire permanently.

Tourism Operators and Travel Intermediaries

The main finding for intermediaries is the overlap between recruitment infrastructure and trafficking infrastructure. This period there were no prosecutions for tour operators, but documented booking, visa and group-logistics tools were systematically abused. Scam-centre trafficking relies on fake job ads that promise free visas and paid travel, and the tourist destination in the ad often hides the real journey, which ends at a remote compound⁵⁹. The Colombia-to-Spain corridor is the clearest example where victims were recruited through fake hospitality offers, then given tickets and hotel bookings so they could pass as tourists³³.

Pilgrimage travel shows the same fraud in a different setting. Fake Hajj and Umrah packages were advertised on Instagram, WhatsApp and counterfeit websites by unregistered agents, with elderly and first-time pilgrims as the target. Prosecutors charged these cases as fraud, not as trafficking, even if the infrastructure behind them is identical. Unregistered agents, document control, debt and stranding abroad all appear, which means pilgrimage fraud can easily turn into trafficking⁶⁰.

Hard numbers came from enforcement at the destination. Over 60 foreigners were denied entry by Migración Colombia in early 2026 on suspicion of exploitation, which is more than half the previous full-year total. Medellín's airport accounted for most of them⁶¹. Ahead of the Hajj, Nigeria's NAHCON checked private tour operators across the country⁶². Booking platforms have carried out prevention work on a voluntary basis, and Airbnb, Vrbo, [Booking.com](#) and Expedia did not face any enforcement during the period. The one most important legal change for intermediaries is Pennsylvania's HB 1286, which shifts the baseline by making operator-training verification a statutory duty for third-party booking platforms²². Booking records, in-app messages and smart-lock access logs are the raw material plaintiff firms now use to build liability theories. The same material serves both sides of a case. Plaintiffs use it to show what an operator knew or should have known, whereas operators use it to demonstrate that proper steps were taken. Access logs and booking records should be kept under litigation-ready retention for exactly this reason, not reduced to the minimum⁴⁴.

Destination-side child-protection enforcement gave the hardest numbers. Migración Colombia denied entry to more than 60 foreigners in early 2026 for suspected exploitation, over half the prior full-year total, concentrated at Medellín's airport⁶¹. Mexican authorities rescued 36 women from a Quintana Roo bar after recruitment through fake waitress jobs that escalated into coerced sex work, and Africa saw preventive action ahead of the Hajj, with Nigeria's NAHCON verifying private tour operators nationwide⁶². Booking platforms ran visible prevention activity, yet none was found in the period against Airbnb, Vrbo, Booking.com or Expedia. Pennsylvania's HB 1286 changed the baseline, imposing the first statutory duty

on third-party booking platforms to verify operator training, the single most consequential legal development of the half for intermediaries²². Plaintiff firms are separately building liability theories using the digital evidence trail, booking records, in-app messages and smart-lock access logs. As both sides will rely on this evidence, hotels and platforms should keep these records complete and easy to produce if a case goes to court. Deleting them under a data-minimisation policy would remove evidence that either side might need⁴⁴.

RISK: ELEVATED Recruitment-channel exposure runs deep in this sector, and platform-liability risk is rising. No operator faced prosecution during the period. Pennsylvania's HB 1286 places the first statutory duty on booking platforms.

What this means for you

Hold destination partners to the same labour standards you apply to staffing agencies. That means no recruitment fees, no document retention and wages the worker controls. Watch for your brand being impersonated in job adverts on Telegram, WhatsApp and LinkedIn. Use booking confirmations to warn customers about job-offer scams that promise paid travel. Keep booking records and access logs in litigation-ready form, because they can work in your favour as much as against you.

Aviation

Aviation's part in this period came down to nothing more than just screening and prevention at borders and along routes. There were no prosecutions against airlines or airport employees, but there was also no crew member to be publicly credited with a rescue⁶³. The documented evidence so far in 2026 shows what border and route work looks like in practice. Manila, for example, where the Philippine Bureau of Immigration stopped two men before a Hong Kong flight. Pakistan's FIA quantified the aviation side of scam-compound trafficking, recording 24,922 travellers to Cambodia across 2024 to 2026. Of those, 3,312 did not return, and around 80 per cent had entered on tourist visas, most of them by air³⁴. Operation Global Chain checked 6,133 flights and vessels across 59 countries, with officers embedded at origin and transit airports⁶⁴.

Aviation's role was screening and prevention, not crew detection or prosecution. No airline or airport-employee trafficking prosecution, and no crew-attributed rescue, was publicly reported in the period⁶³. Documented touchpoints ran through borders and routes instead. The Philippine Bureau of Immigration intercepted two men at Manila before a Hong Kong flight, and Pakistan's FIA quantified the aviation dimension of scam-compound trafficking, 24,922 travellers to Cambodia across 2024 to 2026 with 3,312 unreturned, around 80 per cent on tourist visas mostly by air³⁴. Operation Global Chain checked 6,133 flights and vessels across 59 countries, and embedded officers at origin and transit airports⁶⁴. In Ireland alone embedded officers screened 109 flights and 17,452 passengers⁶⁷.

Two further global dimensions matter for carriers. The first is that getting victims home has itself become an air operation. The Philippines has assisted 3,723 people freed from scam operations, and it has raised its repatriation fund to 1.286 billion pesos to cover the cost of flying them back⁶⁵. The second is that aviation insiders can also be part of the problem and not only the solution. Brazil gave a rare case, where a child-exploitation network was reportedly led by an airline pilot⁶⁶.

Screening only helps if a carrier knows which departures to watch. Five route profiles appear as evidenced risk in this period.

- The first runs from South and South-East Asia toward Cambodia, through Bangkok and Kuala Lumpur. Passengers on these routes travel on tourist visas, and the work waiting for them is in scam compounds.
- The second runs from Latin America to Spain and the Netherlands, where tourist cover hides sexual exploitation.
- The third is Indonesia to Australia, the Operation Mirani pattern, where children are moved on false documents.

- The fourth covers Philippine departures that continue through transit hubs.
- The fifth sits inside the United States, on domestic corridors tied to the tournament. Acting on profiles like these takes more than a watchlist.

Few countries in Asia-Pacific joined the joint enforcement effort. Thailand and Vietnam took part whereas Australia, Singapore and Hong Kong did not, and nothing was reported at Sydney, Melbourne, Changi or Hong Kong⁶⁸. The pattern across the period suggests that interceptions do not come from training alone but from partnership between carriers and border agencies. This makes the training figures harder to ignore, particularly when mandatory training reaches just 41% of aviation staff, while 84% of them say they want it⁶³. The first Asia-Pacific carrier-led programme, the JAL and ANA joint frontline training was announced in late July and gives the region a template to adopt instead of building one from scratch⁸².

RISK: ELEVATED Most of the exposure lies away from the carrier itself, at borders, along routes and inside ground-handling supply chains. A strong prevention infrastructure is in place, but it is applied unevenly across the sector. Profiling partnerships are what produce interceptions, and training volume on its own is not enough.

What this means for you

Measure your own capability and the interceptions your partner agencies make that you can actually see on your routes. Do not try to count trafficking cases linked to your own routes, because the evidence says those numbers are not there to be counted. You should add scripted probes at check-on high-risk departures, that cover purpose of travel, who paid for the ticket and who holds the documents. When something does not add up, the response is a referral to the border authority, not a confrontation.

Labour due diligence should reach catering, cleaning and concession vendors, since DOT guidance now suggests ground handling is an exposure.

The intervention itself belongs at arrival, not in the air. ICAO Circular 357 gives carriers a standardised crew-report form and a report-before-landing protocol, so that cabin crew can raise a concern and ground authorities can meet the flight which is the safe alternative to confrontation the do-not-confront rule requires.

4. Duty of Care and Liability

An organisation owes more to the person who might be harmed on its premises than to the court that might judge it afterwards. The section keeps this order, safeguarding practice first, the financial and legal exposure attached to failure second.

Safeguarding comes first

Every indicator in this report is grounds for escalation and nothing more⁴⁰. Proof belongs to investigators. The task of the staff member is narrower, to notice and to pass the concern upward. Trauma-informed, do-no-harm practice governs how that passing is done, so the response itself adds nothing to the harm. One rule stands above the rest at the frontline, and this is 'do-not-confront'⁶³. Suspicion of exploitation sets off a welfare check and an escalation that travels from security or the designated liaison inside the business to the relevant authority or hotline outside it, and at no point does anyone challenge the person suspected of trafficking. The Omaha case is the lesson on why the reporting route counts as much as the indicator itself. Investigators there began with a theft and only later understood what they were looking at, so any channel that receives anomalous incident reports has to be able to reclassify them⁹.

A working system has a recognisable shape. At the front it gives staff a gentle way in, and the two-question welfare check used at events and airports does that work, 'are you free to leave' and 'who holds your identification', two questions that accuse no one⁸³. Behind that, it gives reports a path around local management, because the manager is sometimes the problem. At the Red Carpet Inn an owner-operator ran an exploitation operation over several years while ordinary employees, by their own account, saw nothing, and the property-level controls failed completely⁷⁰. A reporting channel that keeps the reporter anonymous and bypasses the property still works when local management is the problem. It can be tested with one question. Can a disclosure reach a trained responder through a route the local manager cannot block?

Training is where safeguarding quality is made. The sector's current benchmark is the free curriculum that Hilton, Hyatt and IHG released in January, survivor-informed and available in English and Spanish. Its teaching focuses on the markers of coercion ahead of the markers of commercial sex⁴. Line staff need awareness. Managers need something harder, the ability to hear a disclosure without damaging the investigation that may follow, and that competence has to be trained on its own.

There is a duty is inherent to any training programme. People taught to recognise exploitation will learn to see it, but some of what they see will stay with them. A programme that leaves witnesses and reporters without debriefing or counselling teaches them, in effect, to stop seeing. Reports stop, and the safeguarding-first logic this section is built on stops with them. Staff support belongs in the budget next to awareness training, as a line item in its own right⁸⁴.

Escalation achieves its purpose only when staff know where to take a concern. The table below lists publicly available reporting channels by jurisdiction, and the listings should be read with care, since inclusion guarantees neither round-the-clock availability, nor language coverage, nor any particular practice in forwarding tips. A corporate protocol should pair every national line with a named local law-enforcement liaison. One detail needs immediate attention. The United States national hotline changed operator in December 2025, so any procedure, placard or training deck that still shows the old number has to be checked before it is used again^{1,27}.

Jurisdiction	Channel	Detail
United States	National Human Trafficking Hotline	1-888-373-7888; text 233733. Transferred from Polaris to Compass Connections, completed 8 December 2025; tip-forwarding concerns raised in the Senate. Verify current operator before printing
United States	Federal law enforcement	HSI tip line 1-866-347-2423; FBI tips.fbi.gov; 911 for emergencies
United States	Child exploitation	NCMEC CyberTipline 1-800-843-5678
United Kingdom	Modern Slavery and Exploitation Helpline	08000 121 700; 999 emergency, 101 non-emergency
Canada	Canadian Human Trafficking Hotline	1-833-900-1010

Jurisdiction	Channel	Detail
Mexico	Consejo Ciudadano line	800 5533 000; channel of the Mundial Sin Trata campaign
Colombia	Migracion Colombia	airport checkpoints and portal; inadmission programme extended to hotels
Australia	AFP and Border Watch	afp.gov.au report channels; a Border Watch tip initiated Operation Mirani
Singapore	Ministry of Manpower	mom.gov.sg report channels; work-pass enforcement stepped up
EU and international	Europol and INTERPOL	Europol report-a-crime webform; INTERPOL national central bureaus

The do-not-confront rule is only the first step. The duty of care covers the whole escalation chain, and the chain is different in each sector. In hotels it splits by urgency. An urgent concern goes to security or the duty manager and then to law enforcement, and a labour concern that can wait goes to human resources. Restaurants send labour concerns to human resources and legal, and the suspected controller is never part of the chain. In aviation, cabin crew report to the captain, and operations control then prepares a response on the ground for arrival. At events, concerns go to the command post where the trafficking liaison is based. In every case the chain should be formally documented, not improvised when the incident is under way.

The financial and regulatory exposure

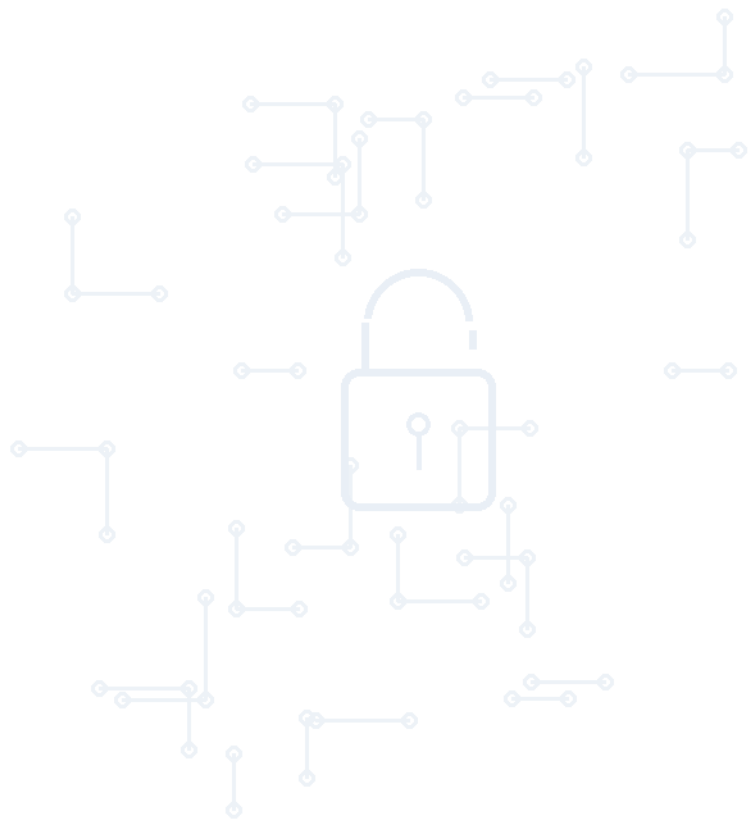
On 11 May FinCEN issued a notice ahead of the World Cup, and it put the sector on notice in a way that can now be documented. The notice lists ten red flags across accommodation spend, payroll anomalies and peer-to-peer payments, and it includes a key term for suspicious activity reports⁴². The notice itself does not create any liability, but the risk comes from how others will use it. Counsel warn that plaintiff firms will point to the notice as proof that accommodation providers, transport operators, staffing firms and booking platforms knew, or should have known, about foreseeable risk during the event period¹⁴. That makes documented training and escalation records a litigation defence. Canada's FINTRAC issued a parallel bulletin on forced labour in hospitality, cleaning and security⁷¹.

Civil cases have strengthened the standard. In *Keller v Extended Stay America*, the District of Utah found that observations consistent with commercial sex, such as lobby meetings, multiple clients and repeated linen requests, do not by themselves prove knowledge of force, fraud or coercion⁴⁰. The case rewards precise records made at the time, covering what staff saw and what they did. A vague claim that training existed is not enough anymore. New filings in Texas and Washington have extended exposure to brands and franchisees, and one of them treats failure to follow a municipal training ordinance as a liability theory on its own⁴¹.

The standard for a court-acceptable record is easy to state. The record should be factual, written at the time, sealed and dated, kept under the applicable retention rule and limited to what was observed and done, with no conclusions. Two further limits apply. Staff must never photograph a suspected victim, because a photograph endangers that person and can damage an investigation, and data-protection rules limit what can be recorded. A dated log of a specific welfare check counts as evidence whereas a vague later claim that training existed does not.

Regulatory exposure has widened in several jurisdictions at once, and it is moving towards labour-side civil and administrative risk and away from criminal risk. The official statistics put forced labour at the same level with or above sexual exploitation among identified victims, even if prosecutions still focus on sex trafficking, so accommodation and food-service employers should expect wage audits, stop-work orders and civil suits before criminal charges⁷². The new instruments build on each other. The EU Anti-Trafficking Directive reached transposition on 15 July and added an offence of knowingly using the services of victims, and Germany has extended demand-side criminal liability to all forms of exploitation^{16,78}. The United Kingdom has proposed amendments to section 54 of the Modern Slavery Act with fines up to the greater of 1 million pounds or 1% of turnover, and the GLAA has been folded into the new Fair Work Agency¹⁹. GRETA flagged this change for the enforcement-continuity gap it creates⁷⁴. Canada now requires a third annual Supply Chains Act report with hardened expectations, and Australia is moving towards fines and criminal liability for large companies.

For governance, the thread that connects these developments is that liability is moving upward, from the individual property towards franchisors, booking platforms and brand quality-assurance functions¹⁴. The modern-slavery statements from Marriott and Four Seasons show where the standard of care is settling, and Four Seasons has committed to labour-provider due diligence by September 2026⁵. From this perspective, the recognised collaborations and participation routes in Appendix B are the documented evidence set that separates a defensible operator from one already on notice.



5. Outlook and Recommendations

The next half

The second half of the year has fixed dates, and managers should plan controls around them. July is the busiest stretch. The World Cup ends with the final on 19 July, enforcement agencies are expected to name venues in announcements through the month, and the first labour-trafficking prosecutions linked to the tournament are likely to follow. America250 brings large crowds to Philadelphia, Boston and Washington on 4 July, and the MLB All-Star Game puts the same cities under pressure again in mid-July⁷⁶. In the autumn the risk moves to college-football weekends and festivals, where much of the work is done by temporary concession and cleaning staff. In November the Las Vegas Grand Prix returns to a city where law enforcement has run stings during past events. The year ends with the holiday peak in November and December, when hotels and restaurants take on seasonal staff in food service and housekeeping at the same time as demand rises. Every seasonal hire should complete the trafficking training module as part of onboarding, and a payroll audit should run alongside it⁷⁷.

Three scenarios are worth planning for in the second half of 2026. The likelihood grades are not based on any outside forecasts but developed based on the Centre's own judgement of what the period showed.

Scenario 1. The World Cup labour-trafficking pipeline surfaces. High likelihood. The warning signs are already visible. The first half brought fake tournament job offers on social media, including one account posing as a FIFA recruiter on LinkedIn, while host cities took on thousands of short-term workers at speed. Both FinCEN and FINTRAC named hospitality, cleaning, security and temporary staffing as the sectors where demand for exploited labour concentrates²⁴. Sex-trafficking cases surfaced first because labour cases take longer to build. The second half is likely to bring indictments, wage-and-hour actions and civil suits against staffing subcontractors, and the hotels and venues that hired those subcontractors can face joint-employer liability. Managers should audit every staffing vendor used during the event period now, before litigation discovery does the same job¹⁴.

Scenario 2. Scam-centre recruitment moves frontline detection to airports and online intermediaries. High likelihood. UNODC has made the issue its 2026 theme, the CCPCJ passed a resolution on forced criminality, the OSCE finds that around 40 per cent of participating states are now affected, and recruits fly the Pakistan-to-Cambodia route on tourist visas⁷⁸. Interceptions at departure airports, on the model used in Manila and Nairobi, should become more common, and recruitment continues through Telegram, WhatsApp and LinkedIn. Check-in and gate staff should learn the outbound profile, a one-way ticket, a story about work that comes with a tourist visa, a young traveller with an escort. Travel intermediaries should watch job adverts for anyone impersonating their brand³⁶.

Scenario 3. Digital-facilitated exploitation escalates through generative AI and crypto off-ramps. Medium-high likelihood. Reports of child exploitation involving generative AI rose sharply, and reports of child sex trafficking rose 323 per cent in 2025. Financial regulators now list peer-to-peer and virtual-currency transfers as trafficking red flags⁷⁹. Detection can no longer stop at what staff see on the floor, because advertising and payment data tell their own story. Plaintiff lawyers are likely to go further and argue that platforms benefited from exploitation, using booking and smart-lock records as evidence. Finance, security and floor teams should work in one escalation chain and booking and access records should be kept to a standard that would stand up in litigation⁸⁰.

One more risk exists under these the three scenarios. When enforcement pressure rises in one place, the networks move, and groups that operated under World Cup cover are likely to shift into nearby corridors such as San Diego-Tijuana and the Quintana Roo tourism zone⁸¹. The regulatory calendar runs alongside everything else, so the dates are worth noting. Member-State penalty notifications under the Forced Labour Regulation are due on 14 December¹⁸, the UK Public Bill Committee is expected to report by 3 November, and the EU AI Act ban on nudification systems (the use of artificial intelligence to digitally remove clothing from a person in a photograph or video) applies from 2 December. Three data releases may reset the baselines used in this report, the first hotline dataset under the new United States operator, the 2026 Trafficking in Persons Report and the UNODC global figures due in November.

Recommendations by role

Corporate risk, CSR and legal officers should act on four fronts.

- Map the exposure your organisation took on during first-half events, and keep training, escalation and vendor due-diligence records in a form that would stand up in court. Plaintiff firms are already citing the FinCEN notice as evidence of constructive knowledge.
- Commission an audit of the labour supply chain across housekeeping, kitchen, security and event-staffing vendors, built on wage and payroll data. That data was the most underused indicator of the period.
- Close compliance gaps against the new instruments in every jurisdiction where you operate, the EU knowing-use offence, the UK section 54 overhaul and the Canadian and Australian reforms.
- Take part in the recognised initiatives in Appendix B and document that participation, because it is the evidence set that separates a defensible operator from an on-notice defendant.

Hotel and accommodation general managers have four tasks.

- Set property-management alerts for the indicator cluster, cash payment with nightly renewal beyond three nights, a single registered guest, no incidental card on file and heavy visitor traffic. Tune the alerts so they prompt a welfare check and never an accusation.
- Put enhanced quality-assurance audits and anonymised reporting channels in place at economy properties on known commercial-sex corridors.
- Refresh training on coercion markers before the holiday staffing peak.
- By 30 September, verify that training content, refresher cycles and record retention comply in every state where you operate, again ahead of the holiday staffing peak.

Restaurant and food-service operators should do two things.

- Run payroll exception reports every quarter and treat them as a trafficking control.
- Extend supplier vetting to cleaning, dishwashing and banquet subcontractors. Joint-employer liability follows the labour, whatever the contract says.

Event organisers have three tasks.

- Audit every event-period staffing vendor before litigation discovery does it.
- Write responsible-contracting clauses into vendor agreements, on the Houston and Kansas City model.
- Set up worker grievance channels for every event in the second half.

Airlines, airports and ground services should adjust on three fronts.

- Add the scam-route indicators to check-in and gate procedures on South and South-East Asia departures, one-way tickets, tourist-visa labour narratives and escorted young travellers, and refer concerns to the border authority instead of confronting anyone.
- Extend labour due diligence to catering and concession vendors.
- Measure capability and partner-agency interceptions across the network as the outcome indicator, and watch the Japan carrier initiative as a template worth adopting.

Tourism operators and intermediaries should act on three points.

- Screen destination partners against staffing-agency labour standards.
- Monitor online job adverts for anyone impersonating your brand.
- Warn customers about paid-travel job-offer scams through booking confirmations.

A closing word on posture

The strongest performers in the first half were the operators who could show what their staff saw and did, in records a court would accept. Detection capability and documented governance are now the same investment. Both need to be in place before the second-half event and holiday peaks, not after.

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Appendix A. Enforcement Operations Matrix, H1 2026

Each entry carries its own source in the References and Endnotes. Status labels, alleged or convicted, are as at 30 June 2026. Items announced shortly after period close are marked.

Operation	Date	Arrests / outcome	Victims	Sector node
Super Bowl LX task force, Bay Area	Feb	29 alleged traffickers	73 survivors, 10 minors	Hotels across 9 counties
Operation Global Chain, 59 countries	8-12 Jun	1,024 arrests, 334 for trafficking	2,070 potential victims	6,133 flights and vessels; Madrid, Barcelona, Frankfurt, Dublin nodes
Operation Red Card, metro Atlanta	Jun (ann. 21 Jul)	153 arrests	54 rescued	Hotel-based control documented
Operation Yellow Card, Massachusetts	Apr-Jun	n/a	35 missing children recovered	World Cup-linked
EMPACT Action Days, 19 countries	4-8 May	Prevention-focused	n/a	First EU operation targeting infiltration of restaurants and hotels; 8,000+ inspections
Quintana Roo bar raid, Mexico	Apr	1 arrest	36 women	Fake waitress jobs escalated to coerced sex work
Operation New Girl, Brazil	10 Mar	1 preventive, 2 searches	Brazilian women recruited to Europe	~R\$4.7m assets seized
ICA-MOM F&B operation, Singapore	10 Mar	11 immigration offenders	n/a	Food and beverage sector, work-pass offences
Eurojust JIT, Austria-Romania (Vienna club)	5 May	4 detained, 11 searches	20+ Romanian women	~1.5m euro proceeds (alleged)
Spain Bilbao and Malaga network	30 Jun	5 arrested, recruiter held in Pereira	Colombian women, one freed before transfer	Fake hospitality job offers with tourist cover
Operation Eclipse, INTERPOL Americas	announced 5 Mar	60 arrests	65 child victims	9 countries, foreign tourists among offenders
Operation Mirani, Australia and Indonesia	concluded (sentenced 10 Jul)	2 convicted	7 removed from harm	Victim flown Jakarta to Sydney on false documents, aviation vector

Appendix B. Sector Collaborations and Participation Routes

Documented participation in recognised initiatives is now part of the evidence set that separates a defensible operator from one on notice. The table lists the collaborations active in the period and the participation route for each.

Initiative	Development in the period	Participation route
AHLA Foundation, No Room for Trafficking	Joint Hilton, Hyatt and IHG training released 28 January; Survivor Fund cycle; expansion to Canada via Hotels Canada	Adopt the free training, donate to the Survivor Fund, attend the summit
DHS Blue Lightning Initiative	150-plus partners; Burlington and Palm Springs airports joined; DOT aviation toolkit published	Airlines and airports join and adopt toolkit reporting protocols
It's a Penalty	Largest-ever World Cup campaign with American Airlines, British Airways, Emirates, Booking.com, Uber, Airbnb, IHG and Hard Rock	Carry campaign materials in-flight, in-app and in-property
ECPAT and The Code	300-plus travel and tourism members; Hard Rock first gaming-sector top member; RIU expanded alliances	Sign The Code, report annually, adopt child-protection protocols
WTTC Unlock Futures	First global private-sector survey on child exploitation prevention; 100-plus CEOs engaged	Contribute to the survey, align with the Action Paper when issued
Unseen (UK)	Service Not Servitude hospitality findings, around 550 potential victims; support for a model Forced Labour bill	Adopt hospitality-specific indicators, engage Fair Work Agency transition guidance
Mundial Sin Trata (Mexico)	Cross-sector World Cup campaign converting hotel, airport and tourism staff into reporting points	Align host-city property procedures with the campaign reporting channel
MPT Campaign against Slave Labour (Brazil)	National labour-prosecutor campaign, joint task forces with inspectors and Federal Police	Prepare for joint inspections, document supplier labour compliance
Tech Against Trafficking	Seattle convening on AI against trafficking, hosted by Amazon, 24 June	Join the coalition, pilot detection tools

Appendix C. Official Headline Statistics, H1 2026

Figures below carry their reference year, since several report on 2024 or 2025 data current during the period. They set the international backdrop against which the case-level developments in this report should be read.

Metric	Value	Reference year
EU registered trafficking victims	9,678, down 8 per cent year on year; 63 per cent female; 46 per cent sexual exploitation, 37 per cent forced labour	2024
OSCE region identified victims	around 102,000; labour exploitation 32 per cent above sexual 21 per cent; forced criminality 17 per cent	2021-24
US Hotline signals, cases, victims	32,309 signals, 11,999 cases, 21,865 victims (latest published)	2024
US Hotline venue markers	hotel or motel 601 sex-trafficking cases, third venue; restaurant and food service 219 labour cases	2024
UK National Referral Mechanism	17,390 referrals January to September; record volumes; labour exploitation the leading type	2025
Spain, CITCO annual balance	1,869 victims freed; 413 operations; 1,056 arrests; 6,775 inspections	2025
France labour-exploitation identifications	459 victims in 65 cases; hospitality among top sectors; 36 per cent of victims labour-exploitation	2024
UK hospitality potential victims	around 550; Skilled Worker visa-linked hospitality cases up sharply; average 18,000 pound fee debt	2024-25
Australia migrant-worker underpayment	65 per cent of migrant workers underpaid; hospitality high-risk	2026 release
Brazil trafficking victims	84 victims; Cambodia top destination with 44; sexual exploitation leading purpose	2025
Colombia SECTT inadmissions	more than 60 foreigners denied entry by April against 110 for full-year 2025	2026 to date
Philippines scam-compound repatriation	3,723 victims assisted; emergency fund raised to 1.286 billion pesos	2026
NCMEC CyberTipline	21.3 million reports; child sex-trafficking reports up 323 per cent; online enticement up 158 per cent	2025

Appendix D. Free Training Resources for Managers and Staff

Programme	Provider	Access	Brief description	Additional notes
COMBAT Toolkit (ICHARM)	ICHARM, University of West London	uwl.ac.uk	EU-funded toolkit developed by UWL (led by Prof. Alexandros Paraskevas), Oxford Brookes University, Lapland UAS and the Ratiu Foundation to help hotels identify and act on trafficking signs, going beyond basic awareness into concrete countermeasures.	Includes 3 reference guides (board/owners, senior managers, staff) with PowerPoints, 7 victim-narrative case studies with 30-minute trainer slides, 7 department-specific 10-minute shift-start trainers, aide-memoire pocket cards and awareness posters. Piloted at Shiva Hotels as part of the Stop Slavery Blueprint. Downloadable via EuroCHRIE (103MB zip); contact alexandros.paraskevas@uwl.ac.uk for access.
Stop Slavery Blueprint & Toolkit	Shiva Foundation (established by Shiva Hotels)	stopslaverytoolkit.org	Free UK toolkit of guidance, templates and training built on the same academic research base as ICHARM's COMBAT toolkit, forming the UK hotel industry's first sector-wide anti-slavery Blueprint; first piloted across Shiva Hotels' own properties before wider rollout.	Implemented across 89 UK hotels with nearly 17,000 trainees completed to date. Includes role-specific workshops (front desk, housekeeping, etc.), an indicator checklist, an Anti-Slavery Champion appointment process (typically the General Manager) and reporting protocols tied to the UK Modern Slavery Helpline (08000 121 700). Convenes the Stop Slavery Hotel Industry Network for member hotels and co-launched a separate free SME-focused toolkit with Stop the Traffik in 2021.
Modern Slavery & Human Trafficking Training	Themis / UK Modern Slavery Training Delivery Group & Independent Anti-Slavery Commissioner	wearethemis.com	Free UK digital training tool developed with the UK Independent Anti-Slavery Commissioner and civil-society partners, originally for financial institutions but applicable across sectors including hospitality supply chains.	Delivered via LMS or downloadable SCORM package; certified version accredited by the London Institute of Banking & Finance.
Business Training & Modern Slavery Helpline	Unseen UK	unseenuk.org	UK charity offering free awareness materials and gap-analysis support, plus bespoke (often paid) CPD-accredited training for hospitality businesses on identifying, preventing and responding to modern slavery risk.	Operates the free UK Modern Slavery & Exploitation Helpline (08000 121 700) referenced across multiple hospitality training materials as the reporting channel; published a 2025 report specifically on hospitality-sector exploitation.
Recognize and Respond	Marriott International / AHLA Foundation / PACT	ahlafoundation.org	Free 60-minute (80-minute for managers) training donated by Marriott to the entire hotel industry, aiming to train every hotel employee to spot and respond to trafficking situations, with distinct learning paths for associates and managers.	Launched July 2022 to mark World Day Against Trafficking in Persons; developed with survivor experts and NGOs; available in 5 languages at no cost.
AHLA Foundation 30-Minute Training	AHLA Foundation / Marriott	wearepact.org	Shorter, foundational free 30-minute online module discussing the intersections between	Free access; complements Recognize and Respond as an entry-level option for smaller properties or quick onboarding.

Programme	Provider	Access	Brief description	Additional notes
	International / PACT		human trafficking and the hotel industry, distinct from the longer Recognize and Respond course.	
Preventing Human Trafficking (Hilton/Hyatt/IHG)	PACT	wearepact.org	Free, survivor-informed 30-minute e-training for hotel owners and operators, developed with input from trafficking survivors in collaboration with Hilton, Hyatt and IHG Hotels & Resorts.	Available in English with Spanish subtitles; includes technical support and a completion certificate; teaches warning-sign recognition and internal reporting procedures.
Hotel Training Course	PACT (formerly Polaris)	courses.wearepact.org	Free 30-minute course for hotel owners, operators and associates, built with input from survivors and partners Hilton, Hyatt and IHG.	Available in 34 languages and English/Spanish subtitles; issues a completion certificate; approved as an alternative course under several US state mandates (e.g. Virginia).
Inhospitable to Human Trafficking	BEST (Businesses Ending Slavery & Trafficking)	bestalliance.org	Free online training using video interviews with hospitality professionals, legal experts and survivors to teach staff how to recognise and report trafficking.	Free for individuals; group/employer options include customisation and completion reporting; adopted by the California Hotel & Lodging Association as its state-compliant course.
DCJS Human Trafficking Training for Hotels	Virginia Department of Criminal Justice Services	vdh.virginia.gov	State-developed free online course for hotel proprietors and employees to recognise and report suspected trafficking, mandated under Virginia law.	Available in English, Spanish, Bengali, Gujarati and Hindi; must be completed individually, not in group settings; useful UK/international benchmark for regulatory-style compliance training.
Bespoke Awareness Courses	Stop the Traffik	stopthetraffik.org	London-based NGO delivering consultation-built awareness training (not a fixed e-learning module) covering what trafficking is, how it is being combated, how to identify and report it, and how to take community action.	Courses are tailored per requesting organisation rather than off-the-shelf; suited to businesses wanting a customised in-person or virtual session.
Industry Training for Frontline Staff	It's a Penalty	itsapenalty.org	Travel and tourism-focused NGO providing free industry training for frontline hospitality and transportation staff, alongside survivor-centred educational videos and public awareness materials.	Scaled campaigns around major sporting events; a 2026 campaign spans the US, Mexico and Canada, targeting hospitality, sports and transportation sectors together.
The Code / ECPAT Training Resource Kit	ECPAT International & The Code Organisation	thecode.org	Free, self-regulatory tourism-sector programme (Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism) created in 1998 by ECPAT Sweden, with an accompanying downloadable ECPAT Training Resource Kit.	Requires company sign-up to the Code commitment; over 130,000 tourism personnel trained globally in a recent year through local ECPAT partners running workshops (e.g. ECPAT Cambodia, ECPAT Germany).

Programme	Provider	Access	Brief description	Additional notes
Human Trafficking (HT) Resources	International Air Transport Association (IATA)	iata.org	Free online tutorial for airline staff plus a cheat sheet and full guidance document on identifying and reporting suspected trafficking, aimed particularly at cabin crew.	Underpins ICAO Circulars 352 and 357 and contributed to ICAO Doc. 10171, a comprehensive strategy for combating trafficking in aviation; includes campaign videos in multiple languages (Spanish, Portuguese).
Combatting Human Trafficking Course	Airports Council International (ACI), delivered via Ceventas	caoc.aero	Free global course for airport employees and stakeholders explaining the key issues, challenges and tools airports need to raise awareness and combat trafficking.	Offered free of charge to the entire global civil aviation community as part of ACI's anti-trafficking commitment.
Flights to Freedom	BEST (Businesses Ending Slavery & Trafficking)	bestalliance.org	Free 25-minute online training helping airport and airline employees identify trafficking indicators and take appropriate action.	Free for individuals; employer add-ons include customisation, completion reporting, live sessions and train-the-trainer services.
Anti-Trafficking Training for Airports	Twentyfour-Seven	twentyfour-seven.org	Training platform for airport authorities, airlines, ground handlers and vendors, covering awareness, safe reporting pathways and alignment with aviation operations.	Deployment includes terminal risk assessment, QR-code reporting placement by zone, and role-based training rollout with ongoing compliance monitoring.
Blue Lightning Initiative (Blue Campaign)	US Department of Homeland Security / CBP / Department of Transportation	dhs.gov	Free 17-minute, four-lesson virtual training mandated for US flight attendants under the 2016 FAA Extension, Safety and Security Act, teaching recognition and reporting of trafficking indicators.	Over 70,000 aviation personnel trained to date; open to any US airline and DHS/DOT are considering expansion to foreign-flagged carriers; includes printed materials, posters and pre-flight video content.



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The International Centre for Hospitality and Aviation Resilience Management (ICHARM) at the University of West London focuses on risk, resilience, and performance in hotels, restaurants, and tourism organisations. The team brings together hospitality, cyber security, and legal expertise to support boards and senior managers in service-based businesses.

The ICHARM Cyber Threat Intelligence team tracks attack patterns, threat actors, and legal outcomes that affect hotels, restaurant and food service operators, tourism brands, and their technology providers. It uses regulatory filings, incident reports, dark web and open source monitoring, and sector specific threat feeds to build an evidence base for decision making in hospitality and tourism.

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