

**Written testimony submitted to the U.S. Senate Committee on Commerce,  
Science and Transportation**

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**Keeli Sorensen, Director of Government Relations and Public Policy, Polaris**

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

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

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

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

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

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

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

In March of 2017, Polaris published *The Typology of Modern Slavery: Defining Sex and Labor Trafficking in the United States* (Typology Report). This report identified a framework of 25 unique types of human trafficking, each with

the potential for numerous sub-types. This framework creates a new organizing principle that lays the groundwork for tailored prevention and disruption efforts, providing actionable insights to critical stakeholders seeking to inform and spur systemic action, better enabling diverse stakeholders to combat the crime within their spheres of influence.

The Typology Report analyzed more than 32,208 cases of human trafficking documented between December 2007 and December 2016 on the National Human Trafficking Hotline and BeFree Textline. This is the largest data set on human trafficking in the United States ever compiled and publicly analyzed<sup>1</sup>. Data from 55 percent of potential human trafficking cases are classified into distinct types. Case types range from escort services to domestic work, traveling sales crews to construction and landscaping. Some cases involve both commercial sex and forced labor. Some traffickers may use only one business model, while other traffickers may use several. For example, a trafficker sometimes may force a victim to engage in commercial sex in outdoor locations such as truck stops, and other times use an escort service model to force the victim to engage in commercial sex at hotels.

The types tend to be more fluid in sex trafficking cases, and traffickers can be nimble and responsive to disruption efforts by changing their business models. Because many victims of labor trafficking are unaware that they are the victim of a crime or that there is a hotline to call for help, and because public awareness of labor trafficking is limited, the National Human Trafficking Hotline and Polaris's BeFree Textline received fewer calls about labor trafficking than sex trafficking. Only 16 percent of the cases identified on these hotlines involved labor trafficking. However, it is important to note that, globally, the International Labor Organization statistics state that labor trafficking is more prevalent than sex trafficking.<sup>2</sup> Polaris strongly believes that labor trafficking cases in the United States are chronically underreported due to a lack of awareness about the issue and a lack of recognition of the significant vulnerability of workers in many U.S. labor sectors.

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

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

<sup>2</sup> [http://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS\\_182109/lang--en/index.htm](http://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_182109/lang--en/index.htm)

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

### Human Trafficking and the Internet

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

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

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

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

Polaris also received reports from 693 victims who specifically stated that they were recruited into their situation via the Internet. However, we've also found that victims are using the Internet to reach out for help, as in the case of the National Human Trafficking Hotline reporting webform. From helpline victim record data, Polaris learned that 679 victims had access to mobile applications and social media during their trafficking situation. This access can and should be leveraged to help victims find assistance.

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

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

#### Hospitality Industry (Hotels & Motels) Intersection with Human Trafficking

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

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

Hotels and motels are the most commonly reported venue for sex trafficking situations involving U.S. citizen victims. These sites allow for buyer confidentiality, since buyers can park at and enter these establishments without oversight. These locations also allow for traffickers to function without being responsible for facility maintenance, enabling them to move between locations avoiding detection. Of the 5,199 escort services cases

Polaris learned about operating the National Human Trafficking Hotline and the BeFree Textline, 2,225 of these cases were based in hotels and motels. Stopping this type of trafficking is heavily dependent on eliciting the support and intervention of hospitality staff.

As discussed in Polaris's Typology Report, labor trafficking is both present in the hotel industry's work force and in its product supply chain. Since 2007, Polaris has learned about 124 cases of labor trafficking taking place directly on the grounds of hotels and motels. Traffickers have included hotel management or those who manage labor recruitment agencies that subcontract with hotels to provide cleaning or groundskeeping services. If the trafficker is a contractor, the hotel may not be aware of the abuse. Most commonly, workers were recruited with job offers that misrepresented the working conditions, wages, and the ability to safely leave the job. In other cases, workers were recruited via other fraudulent promises. Most victims are women and men from Jamaica, the Philippines, and India, and typically they are told that they will make lucrative wages to support family back home. Most victims enter the job with an H-2B visa, which restricts visa portability, tying victims to their abusive employer. J-1 visas are also used, though less frequently. U.S. citizen victims have also been reported.

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

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

## Recommendations for the Hotel Industry

- 1. Formally Adopt A Company-Wide Anti-Trafficking Policy:** Adopt a policy that articulates your company's commitment to combating all forms of human trafficking (sex and labor, and minor victims, U.S. citizen and foreign national victims) at all levels of your business. Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism and the United Nations Guiding Principles on Business and Human Rights, are places to start. Once adopted, the policy should be clearly communicated and implemented at all levels, to ensure there is no human trafficking on-site, within your workforce, or within your company's sourcing/procurement supply chains.
- 2. Train Staff On What To Look For And How To Respond:** Training is essential to identify and respond to human trafficking in your business. Education should occur annually, at the point of hire, and include staff at all levels (property owners, general managers, and line staff) to identify when a suspicious situation may be human trafficking. Trainings should incorporate internal processes and protocols for how to respond to and report human trafficking.
- 3. Establish A Safe & Secure Reporting Mechanism:** Frontline staff, franchisees and vendors/suppliers need a safe and secure method to report concerns as they arise without fear of retaliation.
- 4. Develop A Response Plan For Your Business:** Concerns of human trafficking or severe labor exploitation need to be taken seriously, investigated in a timely fashion, and remediated quickly as possible. Develop an internal process for responding to and reporting human trafficking when it is suspected on-site, within your workforce, or within your supply chain.
- 5. Directly Hire Employees Whenever Possible:** It is well documented that the more temporary, part-time, or removed or tenuous an employment relationship is, the more vulnerable workers are to abuse, including debt bondage and forced labor –two forms of human trafficking that have been found in the hotel industry. If it's not possible to directly hire, know your subcontractors and their recruitment practices well; don't tolerate abusive practices.
- 6. Work With Suppliers And Vendors Who Responsibly Source Their Products:** Human trafficking can occur within your hotel's procurement or vendor's supply chains. Whenever possible, strive to purchase from businesses using fair trade and responsible sourcing models such as GoodWeave, The Fair Food Program, and Servv. Hotels can start by switching to fair trade certified coffee, or inviting these alternative businesses to attend your next trade show.
- 7. Contact The National Human Trafficking Hotline (1-888-373-7888) and BeFree (233733) Textline:** These national resources are available toll-free, 24 hours a day, with teleinterpreting in over 170 languages for help or to report a situation of trafficking. Our triage call specialists are equipped to assess, provide safety planning, and refer to our network of trafficking experts across the United States for a targeted, victim-centered response.

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

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

### Transportation Industry Intersections with Human Trafficking

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

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

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

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

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



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

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

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

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

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

## Conclusion

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

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

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

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

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

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