



Guidance on Human Trafficking

Disclaimer: The purpose of this document is to provide guidance and best practice examples for airlines to address trafficking in persons within their organization.

The guide is not intended to endorse any current regulation, nor to provide any mandatory requirements.

The intended audience for this guide is IATA member airlines. It may also be a useful reference for other aviation stakeholders such as airports, regulatory bodies, and organizations dealing with the prevention of this crime.

The information contained in this publication is subject to constant review in the light of changing requirements and regulations. No reader should act on the basis of any such information without referring to applicable laws and regulations and/or without taking appropriate professional advice.

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Aviation is the business of freedom. Every year airlines safely fly more than four billion passengers over some 20,000 city pairs. Airlines connect businesses to markets, reunite families and friends, and facilitate tourism and cultural exchange.

Unfortunately, the global air transport system can also be exploited by criminals for the illegal trafficking of men, women and children.

The responsibility for detecting, apprehending and prosecuting those perpetrating human trafficking rests with governments and national law enforcement agencies. However, airline and other customer-facing aviation staff can provide an important source of additional intelligence when they are able to recognize signs of potential trafficking situations and report their observations to the authorities.

Some airlines are already involved in human trafficking initiatives, often as part of corporate social responsibility or sustainability initiatives. IATA's role is to ensure that all of our members are aware of the issue and have the tools and resources available so that they too can participate in the fight against trafficking. We have developed a comprehensive range of measures to assist airlines in this regard.

Helping to Prevent Human Trafficking

A key element of our work has been to draw up this comprehensive Guidance. Created with expert input from law enforcement professionals, the Cabin Safety Operations Taskforce and the Security Group, the Guidance provides airlines with the information and tools necessary to develop or enhance policies and procedures. A key aim is to increase awareness concerning the nature, scale and humanitarian consequences of human trafficking and to encourage airlines to train airline staff on how to recognize and report potential trafficking situations. To assist, we are developing training that airlines can integrate easily into existing employee training programs.

While there is no “one-size-fits-all” approach to preventing trafficking, I encourage you to draw inspiration from the operational solutions and industry best practices that are presented in this Guidance. Please provide us with your feedback to help us continue to improve this publication.

A Wide Ranging Effort

IATA, with your help, has also been working on other aspects such as calling on governments and their enforcement agencies to provide clear, practical and discrete mechanisms for airline staff so they can report their observations on potential trafficking situations. IATA is also working with airports and other stakeholders within the air transport sector to raise awareness and share guidance material.

Taken together with these efforts, this Guidance should be an invaluable tool to ensure that airlines are doing everything that they can to help governments and law enforcement to stop those who wish to take away the freedom of others through the crime of human trafficking.

A handwritten signature in black ink, appearing to read 'Alex de Juniac', written in a cursive style.

Alexandre de Juniac,
Director General and CEO

1. Introduction

Globalization of the world economy has increased the movement of people across borders, both legally and illegally and we are witnessing an unprecedented level of human mobility.

At the same time, international organized crime has also become a global enterprise profiting from the smuggling and trafficking of human beings. These and other crimes take advantage of open borders and the increased flow of people, money, goods, and services.

The extent of human trafficking is appalling. It is estimated that every 60 seconds 50 people worldwide, mostly women and children, become victims of trafficking and subject to sexual, labor or other forms of exploitation.

Traffickers use force, fraud, or coercion to lure their victims for the purpose of exploitation. They look for people who are susceptible for a variety of reasons, including psychological or emotional vulnerability, economic hardship, and lack of social security or political instability. The trauma caused by the traffickers can be so great that many may not identify themselves as victims or ask for help, even in highly public settings.

No state is immune from human trafficking being either an origin, transit or destination. The US State Department has stated that human trafficking is the fastest growing criminal enterprise.

Traffickers may use different methods to transport their victims to the destination country, including international civil aviation.

Governments, international organizations and civil society have called for collaboration and coordination by working with airlines to help prevent human trafficking and to deny organized crime the use of aviation as an instrument for exploitation and profit.

This Guidance is intended to provide clarity on the role of airlines in human trafficking. It contains materials and advice to assist *all* airlines, irrespective of size or geography to help them play their part in the fight against human trafficking to the extent possible.

It promotes a comprehensive approach that involves coordination with airports and law enforcement agencies such as border protection and customs agents.

2. What is Human Trafficking?

In 2000, the United Nations (UN) adopted a Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children. This document, known as the Palermo Protocol, supplemented the UN Convention against Transnational Organized Crime (2000). The Palermo Protocol introduced a recognized definition of trafficking in persons (also referred to as “trafficking in human beings” and “human trafficking”) under international law.

Article 3 of the UN Trafficking Protocol states that:

“Trafficking in persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of

payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation”.

The Palermo Protocol sets a series of principles that establish directions and common basis for dialogue between the Nation States when battling against human trafficking. Article 15 of the UN Convention against Transnational Organized Crime outlines that states can make and enforce laws within their physical territory and cascade these laws to the different entities to make sure they are respected.

3. Elements of Human Trafficking

Victims can be trafficked within their own communities or to other regions within their own country, across borders to neighbouring countries, or around the globe to countries where they cannot even speak the native language¹.

Human trafficking is understood to consist of three key elements²:

- 1) **an action** or “what” is done (recruitment, transportation, transfer, harbouring or receipt of persons);
- 2) **the means used** or the “how” is it done (the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person);
- 3) **the purpose** or the “why” is it done (for exploitation).³

All three of these elements must be present (action, means and purpose) when establishing a case of trafficking.

In the case of trafficking of children, the “means” element is not required for the exploitation to be considered trafficking. It is only necessary to show:

- (a) an action and
- (b) a purpose

¹ Recent data from UNODC research shows that a clear majority of victims - 57 per cent - are trafficked transnationally across at least one international border.

² Source: <https://www.unodc.org/unodc/en/human-trafficking/what-is-human-trafficking.html>

³ The purpose of exploitation is not defined in the Trafficking in Persons Protocol; it is only described, allowing States to elaborate on other forms of exploitation when defining “trafficking in persons” in national legislation.

Therefore, *“it does not matter whether illegal means have been used, or if the child has consented; as long as the purpose is exploitation, the child is considered a victim of trafficking”*.⁴

4. Difference between Human Trafficking and Migrant Smuggling

Article 3 of the Palermo Protocol defines Smuggling of Migrants (SOM) as: *“the procurement, in order to obtain, directly or indirectly, a financial or other material benefit, of the illegal entry of a person into a State Party of which the person is not a national or a permanent resident”*.

The terms of SOM and human trafficking are often confused and incorrectly interchanged.

The Palermo Protocol and consequent legislation distinguish between migrants, smuggling and trafficking, considering trafficking not as a single one-off event, but as a process that involves different phases. These include the recruitment, transportation and control of human beings with the scope of exploitation.

Trafficking is the trade in humans most commonly for the purpose of sexual slavery, forced labour, commercial exploitation for the trafficker or others, or for the extraction of organs or tissues. Victims of trafficking may also enter a state or region legally and face subsequent exploitation.

A person being smuggled moves across international borders and is not considered a victim per se. The transaction between the two parties ends once the smuggled person has paid the smuggler to cross the border. A victim of trafficking is a victim of crime and can sometimes pay the trafficker for a better job or life and thus may move across international borders.

Comparing Trafficking in Persons with Smuggling of Migrants

	Smuggling of migrants	Trafficking in persons
Consent	Required	Becomes Irrelevant
Exploitation	Not required	Required
Transnationality	Required	Not Required

(Source: UNODC)

Consent: SOM, while often undertaken in dangerous or degrading conditions, involves migrants who have consented to the smuggling. Victims of human trafficking, on the other hand, have either never consented or, if they initially consented, that consent has been rendered meaningless by the coercive, deceptive or abusive actions of the traffickers.⁵

⁴ The Bali Process RSO, Assisting and Interviewing Child Victims of Trafficking: A Guide for Law Enforcement, Immigration and Border Officials

⁵ UNODC: <https://www.unodc.org/lpo-brazil/en/trafico-de-pessoas/index.html>

Exploitation: SOM ends with the arrival of the migrants at their destination, whereas human trafficking involves the ongoing exploitation of the victims in some manner to generate illicit profits for the traffickers⁶.

Transnationality: SOM is always transnational, whereas human trafficking needs not be. Human Trafficking can occur regardless of whether victims are taken to another country or only moved from one place to another within the same country⁷.

5. Types of Trafficking Activities

Human trafficking is considered as one of the most serious crimes against humanity and the right of individual freedom, and is regarded as undermining the rule of law and the political foundation of states. It is, in most cases, a transnational crime that remains hidden from authorities and by which individuals are treated as mere commodities and traded across the world.

The end purposes of trafficking include:

- a) sexual exploitation, including the exploitation or the prostitution of others;
- b) child soldiery;
- c) trafficking in persons for the explicit purpose of organ removal (which is not donated);
- d) trafficking in persons for forced labour (in mines, fields, factories, fishing vessels, etc.);
- e) selling children for illegal adoption;
- f) exploitation of domestic workers (e.g. private residences);
- g) debt bondage and servitude;
- h) forced marriage;
- i) forced begging;
- j) forced criminality; and
- k) other forms of forced exploitation and slavery-like practices.

6. The Role of the State Regulators

According to the Palermo Protocol and the Recommended Principles on Human Rights and Human Trafficking, “States have a responsibility under international law to act with due diligence to prevent trafficking, to investigate and prosecute traffickers and to assist and protect trafficked persons”.⁸ They should have means to identify traffickers⁹ and develop national guidance that includes

⁶ UNODC: <https://www.unodc.org/lpo-brazil/en/trafico-de-pessoas/index.html>

⁷ Ibid

⁸ Art. 2 of the Recommended Principles and Guidelines, on Human Rights and Human Trafficking (<http://www.ohchr.org/Documents/Publications/Traffickingen.pdf>)

⁹ In the Recommendations, the term “traffickers” is used to refer to: recruiters; transporters; those who exercise control over trafficked persons; those who transfer and/or maintain trafficked persons in exploitative situations; those involved in related crimes; and those who profit either directly or indirectly from trafficking, its component acts and related offences.

appropriate training to aid identification of victims, and training to ensure that migrants and potential migrants receive information about the possible danger of being trafficked.

States have adopted national legislation in accordance with international standards so that the crime of human trafficking is precisely defined in national law and detailed guidance is provided as to its various punishable elements.¹⁰ However, whilst significant progress has been made by some governments in the establishment of national referral legislation, in other countries identification efforts are still limited and only a small portion of victims are identified.

This is where the aviation industry could play a role and assist state authorities in detecting and preventing human trafficking at airports and on aircraft, which may lead to the apprehension and prosecution of traffickers.

7. Data Collection

There are no exact statistics on the extent of human trafficking. However, the International Labour Organization (ILO) estimates that annually 24.9 million people are victims of slavery.¹¹

The International Organization for Migration (IOM) and the United Nations Office on Drugs and Crime (UNODC) maintain databases on transnational and internal cases of trafficking either based on administrative data (victim assistance provided by IOM and others) or open source publications.¹² Additionally, there are various national and regional initiatives to collect trafficking data, but the differing methodologies make it difficult to analyse the data.

Due to its hidden nature, the extent of the problem is difficult to assess and at the same time, it is challenging to extract trafficking data from illegal migration and smuggling. Victims do not report abuse for fear of being prosecuted for criminal offences they are forced to commit.

8. Human Trafficking and Aviation

The vital connectivity that airlines provide delivers tremendous social and economic benefits. However, it can also be misused by traffickers as a means of transporting victims.

Customer-facing employees working in the airport environment and including check-in and gate agents, security screeners and cabin crew, can be an important source of intelligence for governments when they are able to spot the signs of trafficking.

Some airlines are already undertaking anti-trafficking initiatives, however, governments, regulators, NGOs and civil society are increasingly calling for more airlines to get involved.

¹⁰ Guideline 4 of the Recommended Principles and Guidelines, on Human Rights and Human Trafficking (<http://www.ohchr.org/Documents/Publications/Traffickingen.pdf>)

¹¹ International Labour Organization (ILO), Global Estimates of Modern Slavery, 2017 and United Nations Office of Drugs and Crime (UNODC), Global Report on Trafficking in Persons, 2016

¹² International Labour Organization (ILO), Global Estimates of Modern Slavery, 2017 and United Nations Office of Drugs and Crime (UNODC), Global Report on Trafficking in Persons, 2016

Clearly, airlines want to assist in the fight against trafficking because it is the right thing to do.

However, there are some other compelling reasons as to why airlines have a natural interest in supporting governments and law enforcement to tackle human trafficking:

1. Airlines are increasingly required to comply with anti-trafficking legislation.
 - a) In 2016, the US Congress mandated US airlines to provide human trafficking awareness training to cabin crew.
 - b) In the UK, the Modern Slavery Act 2015 requires organizations with a turnover of more than GBP36million to publish an annual statement detailing the steps they are taking to ensure their operations and those of their supply chain are trafficking free. Over 80 airlines are affected. Training and other anti-trafficking activities are an important aspect in demonstrating ongoing compliance.
 - c) More countries including Australia are expected to introduce similar legislation.
2. Recent investigations indicate a clear link between human trafficking and international terrorism where trafficking is used as a means of funding terrorism.¹³
 - a) Terrorism is a constant threat to airlines and it could cause a major loss to their business.
 - b) Preventing trafficking may deter terrorist or criminal groups seeking to take advantage of aviation, thus mitigating risks.
3. Consumers and investors want to buy from and invest in companies that demonstrate commitment to sustainability and being good corporate citizens. Anti-trafficking initiatives can be an integral part of sustainability and Corporate Social Responsibility (CSR) activities.

The above-mentioned elements highlight the need to support law enforcement by being able to identify the signs of potential trafficking and reporting their suspicions to authorities.

Chapter 6 highlighted that states have adopted national legislation in accordance with international standards so that the crime of trafficking can be precisely defined in national law; however, the guidance provided by states is often insufficient.

A critical issue for airline staff, particularly cabin crew, is the lack of a standardized methodology to report suspected cases to the national law and enforcement agencies around the world (i.e. to whom and how do they report suspicions). Similarly, governments have not shared protocols for the handling of suspected victims or traffickers after landing.

To meet requirements set by states, airlines, in collaboration with state authorities, could consider the development of a reference guide or a checklist that staff could use when reporting cases of human trafficking to relevant agencies.

To this end, IATA, in coordination with the Bali Process,¹⁴ proposes a draft checklist in Annex 4 to this document that could be adapted to each airline's policy.

¹³ "Trafficking Terror, How Modern Slavery and Sexual Violence Fund Terrorism", Nikita Malik (2016), Henry Jackson Society

¹⁴ <https://www.baliprocess.net/>

9. Preventing Trafficking Activities

In the aviation environment, prevention of human trafficking begins on the ground by detecting potential signals at the airport and before boarding the aircraft. As such this Guidance would be most effective with an approach that starts on the ground and is complemented in the passenger cabin.

Any collective solution should include the participation of governments and their law enforcement agencies in order to standardize reporting protocols and related responses. At the same time, a coordinated approach by the aviation industry based on guidance provided by government agencies would result in significant improvements to the prevention of human trafficking.

10. Establishing an Airline Policy on Trafficking in Persons

Airlines should develop a specific and detailed company policy for the consistent handling (where possible) of suspected human trafficking across their network. This policy should be robust and fully endorsed by senior management.

It is recommended that this anti-trafficking policy is properly communicated to all airline employees. It needs to be workable and translatable into practical operational procedures.

The policy may include a positive statement of support to minimize and/or prevent human trafficking. It could consist of the following provisions:

- Providing appropriate training to employees (e.g. cabin crew and ground staff) to detect and deal with suspected cases and victims;
- Encouraging ground and cabin staff to report human trafficking signs detected at check-in, boarding gate and on board;
- Recommending staff pay particular attention to possible signals of human trafficking;
- Reporting to local authorities when cases occur and/or are suspected with the provision of further support when necessary.

The policy could also address issues of:

- Training and, if needed, periodic re-training;
- Handling of possible victims and perpetrators on the ground;
- Handling of possible victims and perpetrators on board;
- Responsibilities of crew members and pilot-in-command;
- Communication with authorities (who does what, how and when).

11. Communication of the Policy

It is recommended that the company policy related to anti-trafficking activities be communicated throughout the organization and especially to frontline ground employees and crew members that might be the first point of contact with victims and perpetrators.

The organization's internal communication on human trafficking prevention and the airline's response will reassure employees that they are supported by the management and encourage them to report suspected cases.

A communications campaign could be created and implemented to inform employees about the existence of an anti-trafficking company policy, as well as a specific communication program to inform all ground staff, cabin crew and flight crew of:

- Why the company has created the policy to detect and report suspected cases;
- What the company policy consists of;
- What the organization expects of ground and cabin staff (e.g. inform employees of what actions they should and should not perform and ensure that ground staff identify potential problems and communicate them as requested by local legislation);
- The company's full support to employees acting lawfully and in good faith to ensure safe and secure flight operation.

12. Airline Procedures and Practices

To effectively manage cases of human trafficking at the airport and on the flight, airlines should develop standard procedures to include:

- Definition of human trafficking (in line with the Palermo Protocol);
- Related procedures for cabin crew, flight crew and ground staff duties;
- Procedures for the management of possible victims of trafficking;
- Communication and coordination with responding agencies;
- Prevention strategies;
- Reporting of suspected victims.

The airline may want to also determine a process to liaise with local authorities through assigned responsibilities on board, at the main base and the outstations.¹⁵

In particular, each station should:

- Engage with local authorities;
- Establish a straightforward mechanism to ensure that suspected cases are documented and reported.

Airlines involvement is limited to reporting incidents; they should not be expected to maintain a record or receive outcomes from this reporting.

13. Identifying Trafficking Activities: Key Indicators of Trafficking in Persons

Recognizing signs of human trafficking is the first step in identifying suspected victims and can help save a person from slavery. IATA has developed comprehensive training on human trafficking

¹⁵ This could also be a departmental function whether the airline prefers to avoid key person dependency.

awareness and reporting, so please refer to this for detailed information. However, the following list of indicators could help ground staff and cabin crew members with their assessment:

- 1) Is the person disoriented or confused, or showing signs of mental or physical abuse?
- 2) Is the person fearful, timid, or submissive?
- 3) Does the person show signs of having been denied food, water, sleep, or medical care?
- 4) Does the passenger appear to have suffered injuries as result of an assault or aggression?
- 5) Does the passenger defer to another person to speak for him or her or someone who seems to be in control of the situation, e.g., where they go or who they talk to?
- 6) Is the passenger (especially children) accompanied by someone claiming to be a parent or guardian who is in fact not related to the child?
- 7) Is the passenger in control of their own travel documents?
- 8) Does the person appear to be coached on what to say?
- 9) Does the person have freedom of movement?
- 10) Does the person avoid eye contact? Or on the contrary, does she/he try to establish eyes contact?
- 11) Does the person have few or no personal possessions?
- 12) Are the answers provided by this person consistent at all times?
- 13) Is the person branded with tattoos indicating adherence to somebody else?¹⁶
- 14) Does the passenger provide inconsistent responses from the person(s) travelling with him/her when asked questions?
- 15) Is the passenger wearing appropriate clothing? Does his/her appearance fit the route of travel or weather?
- 16) Is this person speaking of modelling, dancing, singing, hospitality job or something similar in a location (without knowing who will be meeting him/her upon arrival, and with few details about the job); or
- 17) Are there any unusual circumstances that just do not feel right to you?

The above indicators can assist in identification, however a single indicator is not necessarily proof of human trafficking. At the same time, not all indicators listed above need to be present in order to establish a case of trafficking.¹⁷

14. Do not Harm

When dealing with suspected cases of Human Trafficking, IATA recommends that the staff act with care and makes every effort to avoid causing harm to themselves or to the possible victim.

Human trafficking is a crime and under no circumstances should the safety of the suspected victim, ground staff and crew be compromised. If a ground staff or cabin crew member suspect a case of

¹⁶ Experience shows that victims especially girls may have large initials tattooed on their face; or a bar code tattooed across a girl's wrist, like an item in a grocery store.

¹⁷ UNODC has compiled a list of general indicators of human trafficking:
https://www.unodc.org/documents/human-trafficking/HT_indicators_E_LOWRES.pdf

human trafficking, a proper and detailed assessment of the situation is necessary before any response can be initiated.

Words spoken or actions taken may have a harmful impact on a trafficked person and his/her trafficker. Initial response and actions must be carefully considered as they might negatively impact the trafficked person's safety, trust, or emotional state and can make the trafficker suspicious (if they are travelling with the victim).

15. Cabin Crew: Detection and Reporting Procedures

Staff need to be cautious and not try to act on behalf of law enforcement agents, this is a safety and security issue that has to be managed carefully.

IATA recommends that, when a possible victim is identified, the following steps may be considered:

1. Check without being noticed whether there are any trafficking signals;
2. Solicit other staff members to check these signals too;
3. Assess whether the person tries to establish eye contact or on the contrary avoids looking at you;
4. Try to initiate informal conversation asking questions such as:
 - a. Where are you flying from?
 - b. Why are you travelling?
 - c. Are you visiting relatives?
 - d. Where are you staying?
 - e. Who will be meeting you?
 - f. What are your plans?
5. Note seat number and passenger name record (PNR) information, if available;
6. If the victim is accompanied, note if the companion is nervous, prevents the child/person from answering questions, is rude or evasive;
7. Assess the situation with other cabin crew members and your supervisor;
8. Contact the captain-in-command and inform him/her of suspicions;
9. Be cautious and do not try to act on behalf of law enforcement, this is a safety and security issue that has to be managed by professionals;
10. Assess the level of threat and apply airline procedures; and
11. Continue assessing the situation and report additional details to the captain-in-command.

The above are the steps recommended in case a suspected case is detected. However air carriers may need to adapt internal guidance based on their own needs and expectations.

16. Communication Protocols

Victim identification may provide the basis for investigation and prosecution of perpetrators, as well as important data to inform preventive activities and policy development. That's why IATA recommends that the investigation and reporting has to be done anonymously without putting in danger the safety of the airline staff.

Once the suspected victim is identified, the cabin crew will consult with the Cabin Manager to decide the best course of action. An important preventive measure is clear communication. It is vital for all

employees to be aware to never simply “pass” the victim onwards without identifying to colleagues that the passenger is showing signs of potential human trafficking.

It will be the final decision of the captain-in-command to determine whether the information has to be relayed to the origin and destination law enforcement agencies on the suspected case. This process needs to be clarified in the company policy. The captain will have authority to exceed policy but not override it.

As previously mentioned combatting human trafficking is a state responsibility. As such the role of the airline ends once the reporting of suspected cases to law enforcement has occurred.

17. Staff Training

It is key that airline staff employed on the ground and in the cabin have specific guidance to identify and handle these cases.

In order to cope effectively when confronted with cases of human trafficking, it is suggested that staff:

- Have clearly-defined procedures in the company policy that apply to them;
- Know that they have the management support both on the ground and in the air;
- Know that they have the company’s support and guidance for the reporting of cases.

It is therefore suggested that all training/awareness requirements and procedures be linked to the overall company policy at different levels (e.g. aviation security, cabin safety, external affairs and legal). It is also suggested that airlines determine specific training and awareness needs independently of the routes, origin and destination airport where the staff is employed.

18. Content of the Training

The training program should comply with relevant national and international guidelines. It should provide knowledge on how to detect and manage cases of trafficking in persons on the ground and on board of the aircraft. Training could be designed to answer the level of knowledge required by the staff according to their duties (e.g. ground staff may receive awareness while cabin crew may need an in-depth knowledge on how to manage victims and prosecutors).

Some suggested topics that airlines might consider in their training could include:

- What is human trafficking?
- Why it happens and what are the trends?
 1. Key trafficking routes and trends
 2. Statistics (UNODC, US)
- Why are you here? (E.g. to prevent human trafficking, counter legal and reputational risks, etc.)
- What is your role? And how can you help?
- Scenarios of trafficking
 - at check in;
 - on board;

- on arrival.
- What to do and what not to do?
- Trafficking and smuggling
 1. Difference
 2. Key study examples
- Legislation and its relevance to aviation
 1. International Law
 2. Example of supply chain legislation (e.g. UK MSA)
- How to spot the signs of trafficking?
 1. Ground staff
 2. Cabin crew
- Reporting mechanisms
 1. Flight crew and ops
 2. Ground Ops

19. Awareness

As previously mentioned, detecting human trafficking requires the cooperation of all employees involved with the facilitation of passengers through the airport terminals, onto the aircraft and in flight. That is why airlines need to ensure that employees are aware of the organization's policy toward cases of human trafficking. Employees have to be reassured they have the full support of the company when dealing with suspected victims. It is important that the policy is properly documented. The airline may consider having it readily available for reference (e.g. on the company's intranet site).

International organizations and NGOs have developed global awareness-raising initiatives and campaigns. In particular the United Nations Office on Drugs and Crime (UNODC) has developed a Blue Heart Campaign to fight human trafficking and its impact on society. It seeks to encourage involvement from governments, civil society, the corporate sector and individuals alike, to inspire action and help prevent this shocking crime¹⁸.

With the scope to engage the aviation community, IATA initiated the #Eyesopen campaign supported by a short film. The film should not be seen as a training aid. It is primarily aimed at airlines to make them more aware of the issue and to encourage them to get involved. The film is part of a toolkit of awareness raising, guidance and training materials that are available for use by airlines. The call to action is to encourage airlines to get involved by going to IATA's website and to access these resources should they wish.

20. Conclusions

Detecting and managing cases of trafficking in persons is not easy. However, simple and practical steps can be implemented to detect suspected victims and to report cases. Ground staff and

¹⁸ <https://www.unodc.org/blueheart/>

customer-facing operators are an important source of knowledge and first assessment. However, cabin crew are in a unique position as they travel with passengers sometimes for many hours and are able to spot even the smallest signals and behaviours.

It is worth underlining once again that the overall responsibility for identifying, apprehending and prosecuting human trafficking is solely the responsibility of state regulators and enforcement agencies. However, airlines and the wider aviation industry can play an important support role as an additional set of eyes and ears.

IATA suggests to the extent possible a harmonized and standardized approach to the aviation industry that will result in significant improvement in the detection and management of suspected cases.

States and law enforcement agencies are responsible for preventing human trafficking. Airlines may be required to implement anti-trafficking activities by government regulation. However, airlines should always advocate that they cannot challenge cases of human trafficking on their own. It is important that regulators coordinate with all actors in the aviation value chain including airports and other relevant stakeholders. Regulators need to consider various mechanisms to identify potential victims and traffickers. General awareness, education, clear assessment and reporting methodologies need to be in place and should include anonymously reporting suspicions of criminal activity to law enforcement authorities. This approach is summarized in the 2016 US Trafficking in Persons Report which states that: *“Should the day ever come when human trafficking ceases to exist, it will not be because traffickers have stopped trying to take advantage of vulnerable individual’s. Instead, it will be the culmination of efforts from a global community that refuses to allow it to continue¹⁹”*.

¹⁹ US Trafficking in persons report, June 2016 (<https://www.state.gov/j/tip/rls/tiprpt/2016/258686.htm>)

Annex 1: Relevant Law and policy instruments

United Nations Conventions and Protocols

- Convention against Transnational Organized Crime, opened for signature 12 December 2000, entered into force 29 September 2003. <https://www.unodc.org/unodc/treaties/CTOC/>
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime opened for signature 12 December 2000, entered into force 25 December 2003
https://www.unodc.org/documents/treaties/Special/2000_Protocol_to_Prevent_2C_Suppress_and_Punish_Trafficking_in_Persons.pdf

Council of Europe

- Convention on Action against Trafficking in Human Beings. European Treaty Series No 197. Warsaw, 16 May 2005. <http://conventions.coe.int/Treaty/EN/Treaties/Html/197.htm>
- Convention for the Protection of Human Rights and Fundamental Freedoms. European Treaty Series No 5. Rome, 4 November 1950, as amended by Protocols No 11 and 14, 1 June 2010.
<http://conventions.coe.int/treaty/en/Treaties/Html/005.htm>

European Union directives

- Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims; <http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1438160209126&uri=CELEX:32011L0036>

US legislation

- Trafficking Victims Protection Act (TVPA), 2000 supported by the annual human trafficking report <https://www.state.gov/j/tip/rls/tiprpt/2016/index.htm>
- U.S. Department of Transportation Federal Aviation Administration, Information for Operators InFO 16019, 10/25/16,
https://www.faa.gov/other_visit/aviation_industry/airline_operators/airline_safety/info/all_infos/media/2016/InFO16019.pdf

UK

- Modern Slavery Act, 2015 -<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

UN Resolutions

- UN Human Right Council Resolution 11/3 on Trafficking in persons, especially women and children http://www.un.org/womenwatch/daw/vaw/humanrights/A_HRC_RES_11_3.pdf
- General Assembly Resolution 63/156 Trafficking in women and girls January 2009
https://www.iom.int/jahia/webdav/shared/shared/mainsite/policy_and_research/un/63/A_RES_63_156_EN.pdf
- Resolution 64/293 United Nations Global Plan of Action to Combat Trafficking in Persons, August 2010 <http://www.refworld.org/docid/4caadf8a2.html>
- New York Declaration for refugees and migrants, September 2016 <http://www.unhcr.org/57e39d987>
- UN Security Council Resolution 2331 (2016)
[http://www.un.org/ga/search/view_doc.asp?symbol=S/RES/2331\(2016\)](http://www.un.org/ga/search/view_doc.asp?symbol=S/RES/2331(2016))
- UN Security Council Resolution 2388 (2017) [http://undocs.org/S/RES/2388\(2017\)](http://undocs.org/S/RES/2388(2017))

Annex 2: Main Destinations and Transregional Flows

■ Main destinations of transregional flows and their significant origins, 2012-2014



Source: UNODC.

The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.

Annex 3: Be Aware of the Signs - UNODC Campaign



Safety on board

Please do not remove this card from the aircraft

#BeAwareOfTheSigns

Pay attention to these **human trafficking** indicators

If you are a passenger, flight attendant, cabin crew, baggage handler, check-in staff, duty free sales person, migration/custom official, cargo crew, or anyone working in an airline or airport, this information is important for you.

If you see a person showing any of the following signs, please contact the authorities.

			Show fear or anxiety. Feel that they cannot leave. Show signs that their movements are being controlled.
Have limited or no social interaction. Be unable to communicate freely with others. Suffer injuries as a result of an assault or aggression.			
			Be afraid of revealing their immigration status. Not know the address of their home or workplace. Not be in possession of their travel documents as they're being held by someone else. Have false identity or travel documents. Not be familiar with the local language. Allow others to speak for them when addressed directly.

<http://www.unodc.org/endht>

Annex 4: Airlines Assessment Form (example)

  REGIONAL SUPPORT OFFICE THE BALI PROCESS Identifying and Reporting TIP Activities An Assessment Form for Airline Staff Definition Indicators Reporting Referral	<i>Definition</i> What is a TIP activity? Trafficking in persons (TIP) is a criminal offence under US legislation and international law, comprising of: Action – recruitment, <i>transportation, transfer, harbouring or receipt of persons</i> Means – threat, use of force, coercion, abduction, fraud, Purpose – for exploitation, e.g. commercial prostitution, forced labour, illegal adoption, fraudulent marriage, and organ trade <i>Please keep these elements in mind when assessing the situation. You may witness part or the entire process of TIP and it is valuable to have your account of the case.</i> Be cautious and do not try to act on behalf of law enforcement, leave it to the professionals when it comes to safety and security aspect of criminal matters. Potential victims of TIP must be rescued before they board the aircraft or leave the airport and traffickers apprehended. Careful assessment and timely reporting is key to a successful operation.	<i>Protocols</i> Date: Operator: Flight: PNR: Seat: - Look for TIP signals on passenger: ☐ Disoriented, confused, or showing signs of mental/physical abuse ☐ Fearful, timid, or submissive ☐ Shows signs of having been denied food, water, sleep, or medical care ☐ suffers injuries as a result of an assault or aggression ☐ Is accompanied by someone to whom they defers or someone who seems to be in control of the situation ☐ Is accompanied by someone claiming to be a parent or guardian who is in fact not related to the passenger ☐ Is not in control of their own travel document ☐ Appears to be coached on what to say ☐ Freedom of movement is strangely restricted or limited while on board ☐ Avoids eye contact ☐ Tries to establish eyes contact ☐ Is branded with unusual tattoos
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Protocols ☐ Initials near their crotch ☐ Names across their thighs ☐ A bar code across their wrist ☐ Provides answers inconsistently ☐ about themselves ☐ about passenger(s) travelling with them ☐ Does not wear appropriate clothes for the route of travel or weather ☐ Speaks of modelling, dancing, singing, hospitality job or something similar in a foreign country ☐ Travels to work at their destination but knows a few details about the job ☐ Does not know who will be meeting them upon arrival ☐ There are other unusual circumstances that does not feel right to you (please list): 2. Initiate informal conversation asking questions such as: a. Where are you flying from? b. Why are you travelling? c. Are you visiting relatives?	Protocols d. Where are you staying? e. Who will be meeting you? f. What are your plans? 3. If the passenger is accompanied, please check if the companion: ☐ is nervous ☐ prevents the passenger from answering questions ☐ is rude or evasive 4. Cross-check with other staff members to confirm the above signals 5. Report to and discuss with your supervisor, proceed if supervisor agrees to the above signals 6. Contact the captain-in-command and inform them of results from assessment 7. Assess the level of threat and apply airline's procedures 8. Continue to assess the situation and report additional details to the captain-in-command	Referral Contacting authorities Prior to boarding/landing: Here details what airline staff should do. Steps to be determined between airlines and law enforcement authorities. After boarding/landing: Ditto. How to contact local authorities: Ditto. After reporting: Ditto.
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