

# TRUST BY PERFORMANCE

Uniting Business and Philanthropy  
Against Trafficking



U.S. Chamber of Commerce



Center to Combat  
**HUMAN TRAFFICKING**

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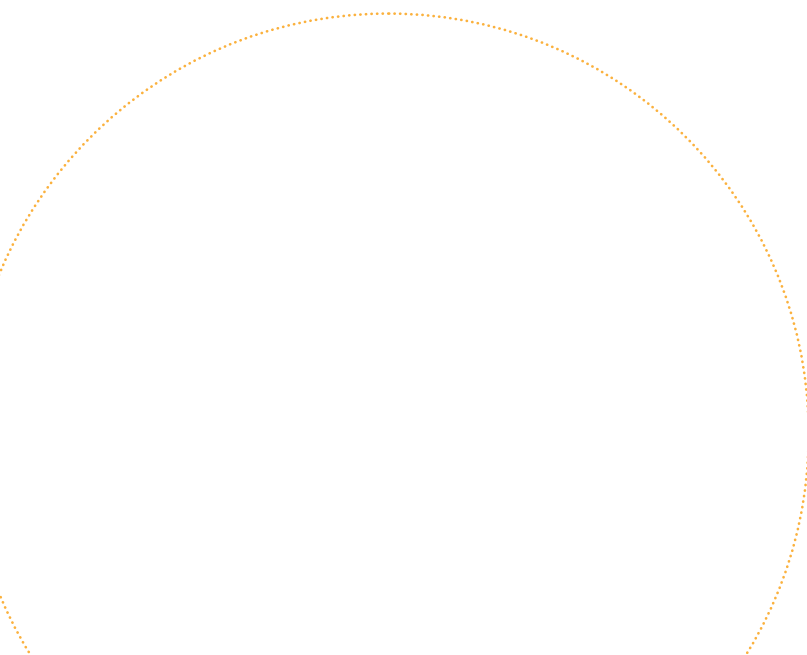
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# DEAR READER:

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Human trafficking is one of the greatest human rights issues of our time. It is a hidden crime with tens of millions of victims, generating massive profits. It targets people who have little social, financial, or political power and robs them of their dignity, labor, and wages. It touches every aspect of our economy, and businesses play a vital role in identifying and halting this heinous crime.

Human trafficking is a complex issue that requires a united and coordinated approach to end it. No single organization, corporation, or government can end this systemic injustice alone—our best hope is an approach that engages all stakeholders.

As such, the U.S. Chamber of Commerce’s Task Force to Eradicate Human Trafficking and the United Way Center to Combat Human Trafficking partnered to produce this special publication to emphasize the important role that the business community and the philanthropic sectors play to thwart this crime.

As the voice of business, the U.S. Chamber’s task force develops toolkits to raise awareness and provide education, hosts programs, and meets with government officials to advocate on behalf of the interests of Chamber members. The task force also offers companies a platform for educating the public about their initiatives to support trafficking victims.

United Way, one of the largest privately funded charities, founded its Center to Combat Human Trafficking to accelerate action, create community-based solutions, galvanize collaboration, and adopt strategies to prevent human trafficking. The organization leverages its global network in 40+ countries and territories to scale the anti-trafficking movement.

This publication presents what business leaders are doing to lead the fight against trafficking. It spotlights anti-trafficking initiatives from worldwide companies such as Deloitte, Delta, Marriott International, Patagonia, and UPS.

In addition, this publication features technological tools—Traffik Analysis Hub, Verité’s CUMULUS Forced Labor Screen™, and Counter Human Trafficking Compliance Solutions Global Risk Assessment Technology™—that businesses use to map data and supply chains to detect and remedy forced labor.

We are pleased to present the various and innovative ways that businesses are leading by example to disrupt human trafficking and forced labor.

We hope this publication will help you envision how your organization can join us in this fight.

Sincerely,



**Mara Vanderslice Kelly**

Executive Director, Center to Combat  
Human Trafficking at United Way Worldwide



**Glenn Spencer**

Senior Vice President, Employment Policy Division,  
U.S. Chamber of Commerce

**A strong relationship exists between the force for good through societal programs, such as ending human trafficking and effective business strategies. Engagement benefits our communities and builds a more positive future that supports the following:**

**Our core values:** Citizenship drives measurable change in communities and inspires actions as societal changemakers.

**Our clients:** Deloitte offers our clients insight and solutions to combat human trafficking.

**Our firm:** Deloitte works with governments to apply innovative solutions to anti-human trafficking policy and legislation.

**Our people:** As a crucial social impact issue, anti-human trafficking is important to our professionals focused on working for companies that promote an ethos of “doing good is good business.”

**Our practice and capabilities:** Deloitte’s Government and Public Services Anti-Human Trafficking team has convened, advised, and delivered services to public- and private-sector entities to end human trafficking and provide dignified support to survivors.

Deloitte’s Global Security and Justice practice helps clients make globally informed and locally relevant choices about border management, law enforcement, aviation, trade, and immigration. We offer a tailored combination of capabilities and experiences across functions and industries. This includes due diligence, data analytics, training and awareness, strategy and innovation, supply chain, change management, information management, and process improvement.

Deloitte’s commitment to being a purpose-driven organization is not just the right thing to do. It’s the smart thing for our business, communities, and people.

**Pro bono efforts:** Deloitte brings together businesses, governments, academia, and social enterprises to stop human trafficking.

Deloitte’s journey began with a Georgetown University symposium on Transforming the Anti-Trafficking Coalition and has grown to encompass a variety of pro bono projects with non-governmental organizations (NGOs), such as Free the Slaves, the Alliance for Freedom, Restoration, and Justice (AFRJ), Wellspring Living, the Global Fund to End Modern Slavery, Survivor Alliance, and the Polaris Project.

Deloitte Consulting LLP was recognized with the Excellence in Social & Community Investments Award by *Consulting® Magazine* for our pro bono work with the Global Fund to End Modern Slavery.

Deloitte has continued to work closely with other organizations, such as AnnieCannons, Inc., where we helped conduct a four-month geographic assessment of six cities to determine potential expansion sites.

AnnieCannons sought to identify a training location to expand its impact for reskilling survivors with critical data science skills. As AnnieCannons implements a transition to scale up and become an independent entity, it will be better positioned to assist survivors on a broader scale, providing sustainable training and employment opportunities.



In addition, Deloitte supported the World Wildlife Fund (WWF) in addressing labor violations related to the farmed shrimp value chain in Southeast Asia. Deloitte worked with the Shrimp Task Force, a group of multinational retailers, shrimp suppliers, and NGOs focused on addressing human rights violations within the shrimp supply chain.

To assist WWF, Deloitte documented the information flow in the Thai shrimp supply chain, articulated the business requirements for a software system, identified potential buy-and-build software solutions, and outlined key considerations for the task force to evaluate the success of a traceability software implementation. These findings helped WWF innovate and transform the process for automating and digitizing a traceability system across the farmed shrimp supply chain in Thailand.

Other efforts include assisting the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons (TIP Office) in developing a more effective data and information management process. Subsequently, this process empowered the TIP Office to better fulfill its mission and make data-driven policy decisions, give recommendations on leading practices, and support those organizations proven to be successful at fighting modern-day slavery.

The COVID-19 pandemic has had widespread economic impacts, with unprecedented unemployment disproportionately impacting women, racial and ethnic minorities, and other vulnerable populations. It is critical that recovery efforts extend to victims and survivors of human trafficking and modern-day slavery.



**Our firm remains proud to help clients craft strategies to bring sustainable employment to survivors of human trafficking while simultaneously combating these reprehensible activities.**

**Eminence:** Deloitte has contributed to the growing body of knowledge on the dynamics of human trafficking and shared leading practices on how businesses, agencies, nonprofits, and individuals can help.

To ensure that the future is more equitable and inclusive, Deloitte acknowledges, elevates, and amplifies survivor voices.

Notable articles include [\*Inclusive Work: Marginalized Populations in the Workforce of the Future\*](#); [\*The Freedom Ecosystem: How the Power of Partnership Can Help Stop Modern Slavery\*](#); [\*Addressing Human Trafficking Risk in Supply Chains\*](#); and [\*Supply Unchained: Fighting Labor Abuse in Your Supply Chains\*](#)

Delta Air Lines is taking an uncomfortable topic and saying enough is enough. The company utilizes its global reach and 75,000+ employees to fight human trafficking and give hope to the 25 million people who are trafficked each year.

Delta Air Lines continues to harness its global reach and 75,000+ employees to fight human trafficking.

Delta began fighting human trafficking in 2011 by becoming the first and only airline to sign the Code of Conduct supported by End Child Prostitution, Pornography, and Trafficking (ECPAT). The following year it was one of 12 founding companies of the Global Business Coalition against Human Trafficking. In 2013, Delta adopted the Human Rights Abuses policy, establishing zero tolerance for any activities related to trafficking.

### **Delta's people are passionate about this issue, and the drive to end human trafficking reaches every Delta division.**

In 2016, Delta created a cross-divisional human trafficking council to expand support of trafficking prevention and with partner Polaris launched the #GetOnboard anti-human trafficking campaign to focus on five key areas of influence: training, volunteering, legislation, customers, and partnerships.

#### **Training**

Delta implemented the Blue Lightning computer-based training to help frontline employees identify and report potential cases of human

trafficking and guided by Polaris created mandatory anti-human trafficking training for flight attendants. To date, more than 56,000 employees worldwide have been trained to remain alert to possible trafficking situations in airports, on flights, and in their communities. In addition, Delta has held anti-human trafficking events for employees with partners ECPAT, Freedom United, Polaris, and Street Grace.

#### **Volunteering**

Delta offers opportunities in 13 cities for employees to volunteer locally, supporting survivors through Freedom Rings, Freedom United, Street Grace, and Wellspring Living. The airline also collaborated with local officials in Atlanta and Minneapolis to educate and engage individuals when each city hosted the Super Bowl.

#### **Legislation**

Delta rallied approximately 150 employees to attend Lobby Day in 2019 in its home state of Georgia to lobby for GA House Bill 234: the Anti-Human Trafficking Protective Response Act. The company also hosts fly-in events in Washington, D.C., for employees to petition government officials for laws to support survivors.

#### **Customers**

Serving more than 200 million people a year, Delta raises passenger awareness of human trafficking



through onboard public service announcements (PSAs) and shares a trafficking awareness video onboard so that customers can join the fight. The video explains signs to look for and steps to take when encountering potential trafficking situations. All Delta seatback monitors are equipped with the video “25 Million: Help the Unseen.”

Delta SkyMiles members can donate miles to Polaris through the SkyWish program. Polaris uses those miles to pay for the airfare that survivors need to return home, receive critical services, reunite with their families, or engage in survivor leadership opportunities. Delta employees and customers have donated over 10 million miles to provide more than 170 flights to survivors.

## Partnerships

In 2018, Delta partnered with Wellspring Living’s Women’s Academy to create an apprenticeship program to help survivors overcome barriers to future employment. These apprenticeships offer survivors career skills, mentorship, and critical work experience.

To celebrate the 20th anniversary of Wellspring Living’s anti-human trafficking awareness campaign, Delta supported Wellspring Living in creating murals painted around the Metro Atlanta area depicting communities coming together to support survivors’ healing. One such mural is prominently displayed at Delta’s In-Flight Training Center in Atlanta.

Between 2016 and 2019, Delta committed approximately \$3 million to combat human trafficking. The company supports 15 organizations and has donated \$2.5 million to Polaris to fund the National Human Trafficking Hotline.



## Tips to Engage Others

- **Leverage your online presence.** Reach people through your social media networks about the facts and realities of sex and labor trafficking. We know that human trafficking is a difficult topic, but only through awareness do we create hope and find solutions.
- **Provide Education.** To counter misinformation about how human trafficking takes place, learn more about how trafficking really happens. Direct your energy and advocacy toward solutions that debunk myths and rumors that divert attention and resources away from reputable work to prevent trafficking and support survivors.
- **Support organizations that do the work.** Become active in organizations that create and fight for policies and programs that support healthy families and strong, equitable communities. Advocate for improvements to housing systems, worker protections, foster care and child welfare systems, and protections for incarcerated people.

# MARRIOTT INTERNATIONAL

As a company that cares deeply about human rights, Marriott International is committed to training all on-property associates to recognize and respond to potential trafficking situations and combating human trafficking in the hospitality industry.

Marriott International became one of the first hospitality companies to address human trafficking, publicly recognizing that hotels can be unwilling venues for this horrific crime.

**In 2017, Marriott's human trafficking awareness training was made mandatory for all hotel workers, becoming the first nonservice-oriented training to be required for all on-property associates.**

More than 930,000 associates at more than 8,000 hotels have completed the training, creating a global workforce that stands ready to recognize and respond to human trafficking and live up to our core company values.

## Training for All Hotel Workers

In 2020, Marriott donated its original human trafficking awareness training to ECPAT-USA, with support from the American Hotel and Lodging Association, to make it available to all members of the hospitality industry at no cost. In just over one year, more than 670,000 hotel workers outside of Marriott have completed the training. We are proud that this training is having an impact well beyond our workforce, equipping the industry with effective tools to combat trafficking.

## New Training for a Changed World

The world has changed significantly in the years since we launched the initial training. COVID-19 has ushered in more contactless and mobile hotel experiences, which can make it more difficult to spot potential indicators of trafficking. Further, we have identified increasingly effective approaches to educate associates about these nuanced behaviors.

In July 2021, [Marriott launched a new training](#) that builds upon the original training by featuring interactive scenarios, separate learning paths for associates and managers, a mobile-friendly design, and increased guidance on responding to potential trafficking situations. These critical enhancements, based on hotel-level feedback, will help associates turn awareness into action and continue to fight human trafficking.

The updated training was developed in collaboration with Polaris, which operates the National Human Trafficking Hotline, and with input from survivor consultants and members of ECPAT-USA's Survivors' Council, to ensure that our response is victim centered and our resources are survivor informed. As we did with the first training version, Marriott will donate the updated training to give all hotel industry employees access to these new resources.





*Image courtesy of  
Marriott International*

## Beyond Training

In addition to training hotel associates, Marriott became the first hotel company to collaborate with Polaris to design public-facing posters and signage to build awareness of the potential indicators of human trafficking and the resources that are available if hotel guests see those signs. We recognize that guests may be in a position to identify potential trafficking situations or may be trafficking victims or survivors themselves.

Marriott also recognizes that access to quality educational and employment opportunities is often limited for trafficking survivors. Therefore, we partnered with the Global Fund to End Modern Slavery (GFEMS) to develop the Future in Training (FiT) Hospitality Survivor Employability Curriculum to provide training and resources for survivors seeking careers in the hospitality sector. In 2020, Marriott and GFEMS began piloting the curriculum with the University of Maryland's SAFE Center to test the program and inform further enhancements. We look forward to making the curriculum available following the pilot.

Marriott raises awareness of human trafficking at various local events and encourages hotels to partner with nonprofit organizations in their communities. From reinforcing training with guest speakers to recognizing World Day Against Trafficking in Persons to preparing for large events that may increase human trafficking in a market, our 2020 Modern Slavery Statement highlights some of these innovative efforts.

Our purpose and global reach give us real opportunities to make a difference in communities around the world. Whether the actions of a single associate or property or the collective efforts of our global workforce, we are proud to contribute to a more hopeful and compassionate world where everyone is free from trafficking and exploitation.

## The Problem

The apparel supply chain is made up of several tiers of production, and it's difficult for retailers to have visibility into all of them. While some might imagine the sewing factory as where clothes are made, there's an extensive network of fabric mills, processors, and finishers upstream from these factories without which there would be nothing to sew.

In 2011, Patagonia began to fully map its supply chain beyond sewing factories to learn who is involved in making the fabrics that are essential to our products. We conducted social responsibility audits on key suppliers, which led to an uncomfortable truth. We found that many of our supplier partners were employing foreign migrant workers who paid thousands of dollars to a third-party recruiter for the right to work.

The exorbitant fees put workers at high risk for bonded and forced labor, which is further exacerbated by living in a foreign country where these workers lack the support to get out of such situations. The practice of charging recruitment fees is legal in countries around the world, but it is against Patagonia's workplace values

and principles. Rather than walking away from these suppliers and leaving workers helpless, we committed to remediation and deployed a multipronged approach to improve such conditions.

## The Journey Toward Remediation

We view the protection of migrant worker rights as everyone's responsibility.

Patagonia's approach centers around strategic collaboration with key stakeholders that drive changes from within a company and those that help drive systemwide change across the apparel-manufacturing sector.

### This involves the following:

**Internal alignment:** We ensure that Patagonia's cross-functional supply chain teams understand the issues, so that we can convey the importance of remediation and incentivize suppliers to make improvements.

**Supplier partnership:** Change cannot happen without action from suppliers. Therefore, it is critical for us to gain our suppliers' commitment to address migrant worker issues and show them our commitment to working together.

## Program Implementation Strategy

Internal Alignment	Supplier Partnership	Brand & Industry Collaboration	External Engagement
<ul style="list-style-type: none"> <li>• Leadership support</li> <li>• Sourcing team support</li> <li>• Joint departmental messaging</li> <li>• Resources for staff to manage program</li> </ul>	<ul style="list-style-type: none"> <li>• Supplier education on migrant worker issues</li> <li>• Tailored approach and conversations</li> <li>• Contributions to costs</li> </ul>	<ul style="list-style-type: none"> <li>• Seeking collaborations with like-minded brands</li> <li>• Gaining support through industry coalitions</li> </ul>	<ul style="list-style-type: none"> <li>• Learning from experts</li> <li>• Working with NGOs</li> <li>• Working with government</li> <li>• Raising consumer awareness</li> </ul>



**Brand and industry collaboration:** We work with leading apparel brands to communicate and implement similar responsible recruitment requirements to give manufacturers a greater business incentive to address the issues.

**External engagement:** We encourage governments, non-governmental organizations, industry associations, and consumers to play a role in strengthening businesses' commitment to support migrant worker rights.

Actions taken within each of these areas have led to significant benefits and protections for workers.

## Positive Changes

**Meaningful changes take time and effort of many committed parties. We thank our suppliers for the extensive work they have done to rebuild their recruitment systems and invest in their workforces to ensure that no workers ever pay for their jobs.**

Here is one [example](#) that brought together several partners over a five-month period and resulted in 171 workers at a factory in Thailand receiving more than \$100,000 back in previously paid recruitment fees and an end to the practice.

This example and others like it in our supply chain have shown us the power of collaboration. Working with our suppliers, industry peers, and civil society, we will continue to protect the most vulnerable in our communities.



The multibillion-dollar criminal enterprise of human trafficking impacts hundreds of thousands of people in the U.S. and 40 million+ globally. Making a difference requires a coordinated approach from many stakeholders in various industries. As a global leader, UPS knows that the transportation industry is uniquely positioned to help stop this heinous crime.

UPS has stepped up its efforts to put the brakes on human trafficking through stronger policies, employee awareness initiatives, and collaborative, philanthropic partnerships to achieve a collective community impact.

### **Policies**

UPS strengthened its Anti-Trafficking in Persons Policy and published it on the company's Compliance & Ethics website. This policy, which strictly prohibits the use of any UPS assets or resources for any purpose that would enable the trafficking of persons, governs the UPS enterprise as a whole—its employees, suppliers, consultants, third-party representatives, and subcontractors.

### **Awareness**

UPS joined forces with Truckers Against Trafficking (TAT), a Colorado-based nonprofit whose mission is to saturate trucking and related industries with educational materials and equip drivers to recognize the signs of sex trafficking—teaching them whom to call, what to do, and, importantly, what not to do.

UPS drivers deliver in every community and can see something and say something that could save lives. As COVID-19 continues to impact vulnerable communities, UPS has expanded its partnership with TAT to provide training for all drivers in the U.S.

As a part of this expansion, UPS supports TAT's Freedom Drivers Project (FDP), which uses a semi-tractor trailer equipped with resources to serve as a mobile exhibit on human trafficking. As of 2021, the exhibit reached more than 20,000 people. UPS provides in-kind transportation of the FDP, and select UPS drivers are trained to facilitate exhibit tours. The UPS Foundation provided funding for TAT's podcast, Driving Freedom, which educates listeners on human trafficking and provides lifesaving information for trained truckers who can help shut down the illicit industry.

### **Community Impact**

UPS and United Way have joined forces to combat human trafficking. UPSers continue to fuel the movement to end human trafficking by partnering with and supporting the work of the United Way Center to Combat Human Trafficking. Through



this partnership, the center has built pathways to leadership for survivors, educated millions about the issue, developed community-based programs, and conducted global research that lays the foundation for increased impact in the movement to combat human trafficking.

**The United Way Center to Combat Human Trafficking focuses on four key impact areas:**

- Diversity, Equity, and Survivor Leadership: Placing Lived Experience at the Center of Our Work
- Public Engagement: Educating Communities and Raising Awareness
- Collective Impact: Building Better Communities for All
- Catalyzation for Action: Strengthening the Anti-Trafficking Movement

Among the center’s many UPS-funded programs is the Community Impact Program, which addresses systemic issues identified by local United Ways, including providing housing in Atlanta, Georgia; connecting stakeholders in poverty-stricken

communities in Brownsville, Texas; understanding the intersection of social services and survivor needs in Louisville, Kentucky; and tackling trafficking in a community with a prevalent commercial sex market in Las Vegas, Nevada.

Each of these critical United Way programs is made possible by the generosity of UPS employees who have contributed over \$5 million to United Way in the fight against human trafficking. You can learn more in the report [United Against Human Trafficking: Impact Report.](#)

**Partnerships**

The business community faces risks and challenges associated with human trafficking on a daily basis. UPS is proud to harness the power of public-private partnerships to address this important issue in a meaningful way.

# COUNTER HUMAN TRAFFICKING COMPLIANCE SOLUTIONS

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Counter Human Trafficking Compliance Solutions (CHTCS) believes that companies have the power to change the world one supply chain at a time. CHTCS is a firm founded with a unique mission to counter forced labor in supply chains using cutting-edge technology-based solutions.

## Our Company

CHTCS is a woman- and disabled veteran-owned advisory firm founded on the belief that businesses can be agents of change to improve the lives of all their stakeholders. Our team brings decades of combined experience in intelligence, supply chain, and technology to the battle against forced labor.

## Our Mission

CHTCS empowers organizations to make smarter, faster, and socially responsible supply chain decisions that help ensure compliance with internal and external standards. The firm promotes good corporate citizenship and sustainable business operations by leveraging technology, intelligence, and operational expertise. It also identifies, analyzes, and mitigates potential risks throughout the entire supply chain through increased transparency.

## Our Efforts

CHTCS issues a quarterly journal—a comprehensive analytical report on human trafficking, forced labor, and modern slavery news and developments.

In addition, its groundbreaking technology platform tool, GRAT (Global Risk Assessment Technology), leads the way in helping companies identify and respond to potential risks of forced labor in their supply chains.

## Functions of GRAT

GRAT is designed as an AI-powered, data-driven tool to manage all aspects of supply chain risk. Cloud-based storage ensures the security of data, and a user-friendly interface makes the collection and reporting of data simple for executives and their staffs and suppliers. GRAT fits on a single visual dashboard putting relevant data and actionable information at your fingertips.



## The GRAT platform performs the following functions:

- Automatically scores supplier surveys using our proprietary Risk Scoring System.
- Provides complete supply chain mapping.
- Automatically generates standard and custom reports.
- Automatically generates a prioritized list of areas of potential risks, along with recommended actions to address them.
- Updates the scoring and risk profile as conditions on the ground change.

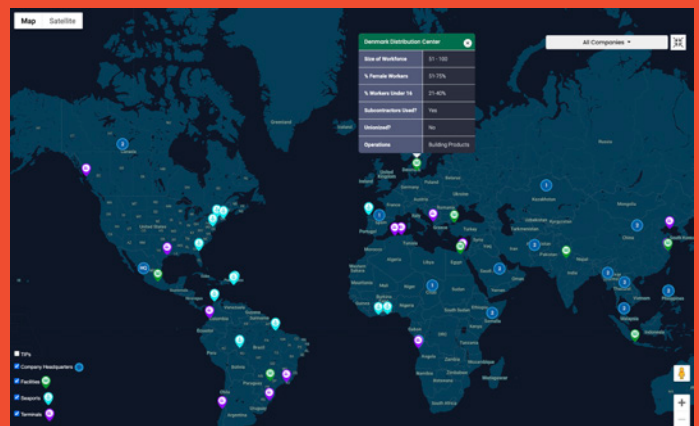
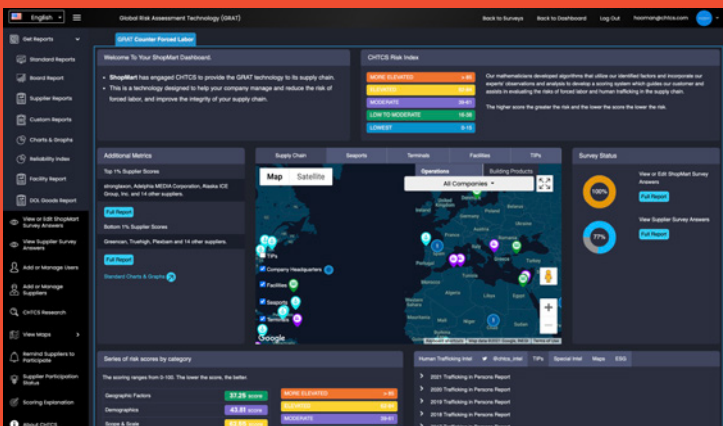
## Our Client's Success With GRAT

Our GRAT technology was deployed at a major call center in the Philippines. Our client, the owner of the call center, was bidding on several large contracts with U.S.-based retailers.

These retailers implemented stricter new compliance protocols regarding labor practices in their supply chains, and our client wanted to ensure that its policies would comply with the specific requirements needed to win the business.

In real time, GRAT was able to uncover several compliance and labor practices that left the call center exposed to potential forced labor in its workforce. This would have prevented it from working with companies based in the U.S.

CHTCS was able to provide a detailed report to our client that took immediate action to mitigate the risk and ensure it was conducting business in a lawful and ethical manner.



CHTCS' Global Risk Assessment Technology provides a fully customized dashboard interface to manage supply chain risk.

# TRAFKIK ANALYSIS HUB

## Mission and Overview

Traffik Analysis Hub's (TA Hub's) mission is to develop the world's most comprehensive and sophisticated anti-trafficking digital platform to facilitate and accelerate the ability of organizations to disrupt and prevent the root causes of modern-day slavery and exploitation.

TA Hub provides a community of over 100 organizations globally—including businesses, financial institutions, law enforcement, academia, and non-governmental organizations (NGOs)—with a trusted technological solution. The platform works to significantly increase resilience, build knowledge, and ensure that businesses are guided by the best intelligence.

TA Hub analyzes incidents of trafficking and discerns how they are linked to the global trade of forced labor and sex trafficking. TA Hub, employing advanced cognitive technologies

developed by IBM, combines multiple data sets in one secure system and facilitates the sharing of information quickly in a user-friendly format.

## Origin

TA Hub was conceived as a concept in India in late 2010 by founder Neil Giles, a senior U.K. law enforcement officer with 35 years of experience. Giles saw the extraordinary scale of trafficking and exploitation, spent time with survivors, and recognized that the justice process was fundamentally incapable of handling the magnitude of this crime. A smarter approach was demanded to make the scale and nature of human trafficking transparent.

The unique blend of open-source scraped data, survivor narratives, and an assortment of complementary source material that TA Hub provides took seven years to gain traction with the anti-trafficking community. In 2017, the concept of TA Hub became reality when Clifford Chance LLP offered legal advice to get the gears running and IBM built the architecture for the platform.

## The Detail

TA Hub is an online platform containing the detail of over a million human trafficking incidents, the richest dataset worldwide.

These incidents comprise NGO data case files, police and law enforcement data, and media reports. They use and incorporate open-source datasets, such as the Open Apparel Register and groundbreaking collaborations with organizations like the Anti-Human Trafficking Intelligence Initiative (FollowMoneyFightSlavery).





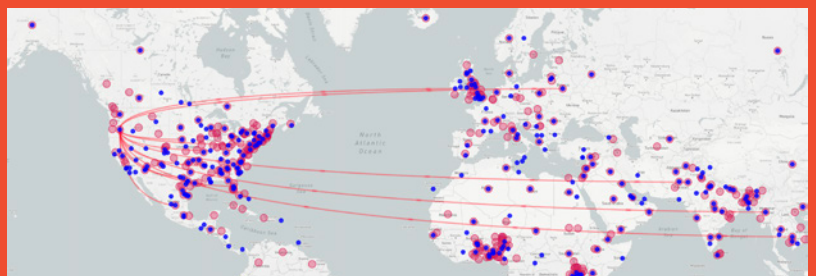
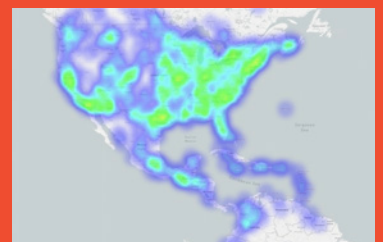
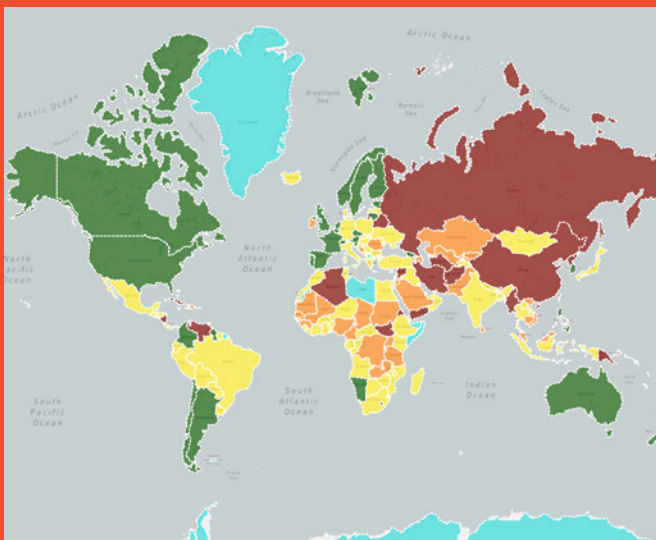
**This data is brought together in visualizations to enable users to access the following information in a highly consumable manner:**

- Cleansing of corporate supply chains.
- Rescuing and rehabilitating those who are being trafficked.
- Preventing trafficking activity.
- Arresting and prosecuting those who are trafficking.

**Initial success can be separated into four main areas:**

- Driving collaboration through a unique intelligence community and enabling academics, law enforcement, NGOs, businesses, and financial institutions to work together with the hub as a focal point.

- Identifying and exposing trafficking routes widely used by traffickers to move their victims across continents from recruitment into exploitation.
- Providing an opportunity for businesses to measure their progress in achieving Sustainable Development Goals (SDGs) and Environmental, Social, and Governance (ESG) objectives by providing an economic analysis and an ability to inform supply chain integrity.
- Identifying and exposing trafficking incidents through the development of the richest compendium of red flag typologies of trafficking transaction patterns for the financial industry in partnership with Red Compass, a financial crime consultancy.



Hotspot data indicates sectors and locations that are disproportionately vulnerable to trafficking due to investigative work and aided by survivor voice.

## **Ethical Recruitment Remains Elusive in Global Supply Chains: Learnings From Verité's CUMULUS Forced Labor Screen™ Platform**

Despite the growing awareness of and commitments to ethical recruitment, an analysis of CUMULUS Forced Labor Screen™ data from 2019 to the present reveals that fewer than 5% of employers fully absorb the cost of cross-border recruitment, including all fees and related costs. Instead, those costs continue to be passed on to foreign migrant workers. This data is based on a review of more than 600 employers and their recruitment agents, with employers operating in Southeast Asia, the Middle East, the Gulf Cooperation Council region, North Africa, and Europe and in industries as diverse as electronics, apparel, consumer goods, food, logistics, construction, extractives, and hospitality.

Two years since the platform's launch, some employers have completed a second annual risk screening. Among this small subset, due to the pandemic, the data indicates there may be cause for optimism. Employers that have recruited new cohorts of foreign workers have begun to establish agency relationships, systems, and processes that are foundational to fully absorbing the cost of ethical recruitment—and, significantly, to holding their recruitment agents and other intermediaries accountable for ensuring that workers are not charged for their jobs. The recruitment agents helped client employers recruit and deploy more than 125,000 foreign migrant workers from approximately 40 countries. It's an important first step toward sustained compliance and safer, fairer labor migration.

Others have reimbursed workers for recruitment fees and related costs they should not have been charged.

## **The CUMULUS Screening Process**

The CUMULUS Forced Labor Screen™ is a remote, technology-driven approach to labor supply mapping and predictive forced labor screening in supply chains. CUMULUS gathers information and documents about recruitment practices and recruitment agents from employers (e.g., suppliers, contractors, service providers, franchisees, and other supply chain business partners) via a secure online platform. Verité then analyzes the data using a detailed and targeted Due Diligence Assessment (DDA). DDA focuses on contractual and financial relationships, as well as recruitment, deployment, and management systems specific to migrant worker populations.

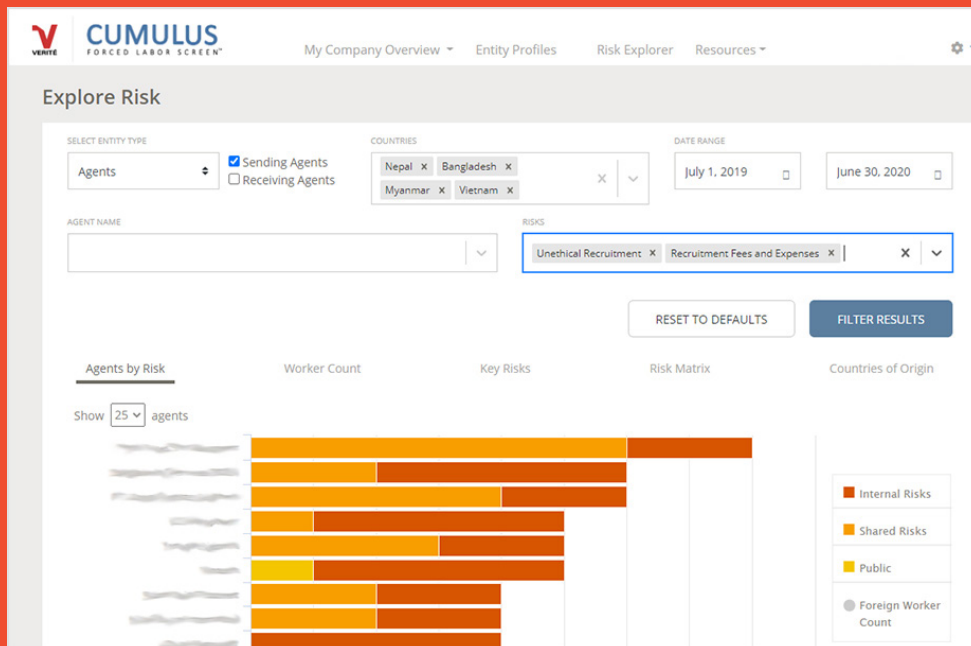
Reflective of the international definition of forced labor (Convention 29 of the International Labour Organization), Verité employs a comprehensive framework to flag risks related to the practices of employers and their recruitment agents. Issues that trigger risks include deceptive recruitment, nonexistent or inadequate financial and contractual relationships between employers and agents, ineffective due diligence and controls, induced indebtedness, restrictions on freedom of movement, worksite practices, and lack of transparency. Risks related to recruitment agents, including publicly available information, are confidentially shared on member company dashboards on a limited and source-redacted basis.

## Ethical Recruitment: the Exception, Not the Norm

Almost 80% of risks across all sectors and regions reported on the platform indicate that ethical recruitment is still very much the exception, while the norm remains that most workers end up paying for the recruitment fees and costs associated with their jobs. While many of the employers claimed they—not workers—paid the recruitment fees and costs, documentary evidence provides clear and convincing proof that the overwhelming majority did not pay all identifiable and quantifiable costs, particularly those incurred in sending countries. A sizeable minority of employers acknowledged that they do not pay all these costs. In other cases, CUMULUS analysts were able to determine that employers

had knowledge of collusive and even illegal arrangements between recruitment agents in receiving and sending countries to charge foreign workers up to \$5,000 in recruitment fees and costs prior to departure.

CUMULUS data reveals there is very little understanding of the contractual and financial relationship between employers and their agents, the true costs needed to underpin ethical recruitment, let alone the effort needed to change the underlying dynamics. Verification of recruitment fees and related cost payments between employers and recruitment agents has proven to be an objective and scalable technique in assessing the effectiveness of ethical recruitment implementation.



This graphic, which depicts the CUMULUS user dashboard, screens priority operations, supply chains, and investment portfolios for the presence of the International Labour Organization forced labor indicators.

# ABOUT US



## About the United Way Worldwide's Center to Combat Human Trafficking

United Way fights for the health, education, and financial stability of every person in every community. With global reach and local impact, we're making life better for 48 million people annually. United Way is the world's largest privately funded nonprofit, working in 95% of U.S. communities and 40 countries and territories.

Human trafficking is a complex issue that requires a united and coordinated approach on behalf of those working to end it. No single organization, corporation, or government can end this systemic injustice alone—our best hope is an approach that unites all stakeholders.

The United Way Center to Combat Human Trafficking was founded in 2015 as a global center to accelerate action. We are working to create effective community-based solutions, galvanize collaboration across sectors, and build public and political will to scale strategies across the world that find, stop, and prevent human trafficking.

**We are innovating where needed, uplifting good work already being done, elevating survivor leadership, and utilizing the United Way network to catalyze the anti-trafficking movement.**

## About the U.S. Chamber of Commerce's Task Force to Eradicate Human Trafficking

The U.S. Chamber of Commerce, the world's largest business organization representing companies of all sizes across every sector of the economy, established the Task Force to Eradicate Human Trafficking. The task force is an advisory group made up of members who work with the federal government and the private sector to develop commonsense solutions and speak with one voice.

Human trafficking is a global problem affecting millions of people each year who are illegally lured into forced labor and sexual exploitation through force, fraud, or coercion.

The U.S. Department of Homeland Security (DHS) estimates that human trafficking is second only to drug trafficking as the most profitable form of transnational crime, generating billions of dollars per year in illicit profit. All victims of trafficking share one experience: the loss of freedom.

Businesses face an economic, legal, and reputational risk if they engage in human trafficking. As such, they have an important role to play, and they cannot do this work alone. The business community needs to partner with governments and non-governmental organizations (NGOs), social service organizations, skills-based training organizations, and others to address the scope of this problem.

# RESOURCES

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## **U.S. Chamber of Commerce and A21 joint toolkit, *Human Trafficking***

In conjunction with The A21 Campaign, whose mission is “to abolish slavery everywhere, forever,” the Stop Trafficking Now toolkit educates businesses on how to detect and stop labor trafficking in supply chains.

## **U.S. Chamber of Commerce and Truckers Against Trafficking *Business Engagement Toolkit***

The U.S. Chamber, in collaboration with Truckers Against Trafficking (TAT), a nonprofit organization that educates, equips, empowers, and mobilizes members of the trucking, bus, and energy industries to combat human trafficking, produced this toolkit to train employees on the dangers posed by sex trafficking and provide best practices.

## **U.S. Chamber of Commerce *Leading by Example***

This publication focuses on how businesses are taking the initiative to recognize the warning signs of human trafficking and how to stop it. It features company profiles of Deloitte, Freedom a la Cart, Marriott International, Polished Pearl, Selah Freedom/Selah Way Foundation, and Walmart and presents strategies that businesses of all sizes can use to thwart this heinous crime.

## **U.S. Chamber of Commerce and Counter Human Trafficking Compliance Solutions (CHTCS), *CHTCS Journal Special Edition***

This joint publication by the U.S. Chamber of Commerce and Counter Human Trafficking Compliance Solutions provides an overview of the U.S. Department of Homeland Security’s Blue Campaign; contributes a case study of the health care provider PatientPoint; and highlights the U.S. Chamber’s role as the voice of industry.

## **U.S. Chamber of Commerce and Alliance for Freedom, Restoration, and Justice (AFRJ) Freedom Council and Randstad, *Business Solutions Empowering Human Trafficking Survivors***

This publication by the U.S. Chamber of Commerce; the Alliance for Freedom, Restoration, and Justice (AFRJ); and the staffing firm Randstad depicts how the business community is taking the initiative to uplift individuals who have been marginalized and how these entities partner with non-governmental organizations to assist trafficking survivors reintegrate into society.





Center to Combat  
**HUMAN TRAFFICKING**



U.S. Chamber of Commerce