



# Combatting Human Trafficking

A practical guide for airlines (2nd Edition)





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| <b>Purpose</b>           | <p>The purpose of this document is to provide guidance and best practice examples for airlines to address trafficking in persons (which is also known as human trafficking) as part of a multi-stakeholder approach across the aviation value change.</p> <p>The guide is <b>not</b> intended to endorse any current regulation, nor to provide any mandatory requirements.</p> <p>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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <b>Version</b>           | <p>This is the second edition of the guidance and was published in <b>May 2023</b>, replacing the original version first published in 2018.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |



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## Foreword



Aviation is the business of freedom. Every year airlines safely fly almost four billion passengers on 20,000 city pairs around the world. They connect businesses to markets, reunite families and friends and facilitate tourism and cultural exchange. In doing so airlines deliver huge social and economic benefits.

Unfortunately, the connectivity provided by 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 their law enforcement agencies. However, they believe that public-

facing transportation staff can be an important additional resource in the fight against this crime when they are trained to recognize behaviours that are consistent with suspected human trafficking situations and can report their observations to the relevant authorities.

### **An industry-wide approach**

At the 74th IATA Annual General Meeting in 2018, airlines unanimously approved a resolution denouncing human trafficking and committed to several actions including:

- Encouraging airlines to train relevant operational staff to recognize potential trafficking situations and to report these to government authorities in line with company policy
- Calling on governments to establish clear and discreet mechanisms for the reporting of suspected trafficking
- Calling on stakeholders across the aviation value chain to work collaboratively with government authorities on initiatives for the prevention and suppression of human trafficking

### **IATA's role**

IATA's goal is that every member airline, irrespective of size, is aware of the issue and has the tools and resources available to participate in the fight against trafficking. We have developed a comprehensive range of measures to assist airlines in this regard.

A key element of IATA's work has been to draw up this comprehensive guidance document on combatting human trafficking. Created with expert input from law enforcement professionals, international organizations, IATA's Cabin Safety Operations Task Force and the Security Group, this second edition provides airlines with updated information, new examples of global good practice and some of the tools necessary to develop or enhance policies and procedures.

We have also launched the #Eyesopen campaign to increase awareness concerning the nature, scale, and humanitarian consequences of human trafficking and to give airlines the means to train staff on how to recognize and report potential trafficking situations. IATA has developed both a free e-learning course as well as classroom training that carriers 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 good practices that are presented in this guidance. It should be an invaluable tool to ensure that airlines are well positioned 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 blue ink, appearing to read "Willie Walsh".

**Willie Walsh**  
Director General

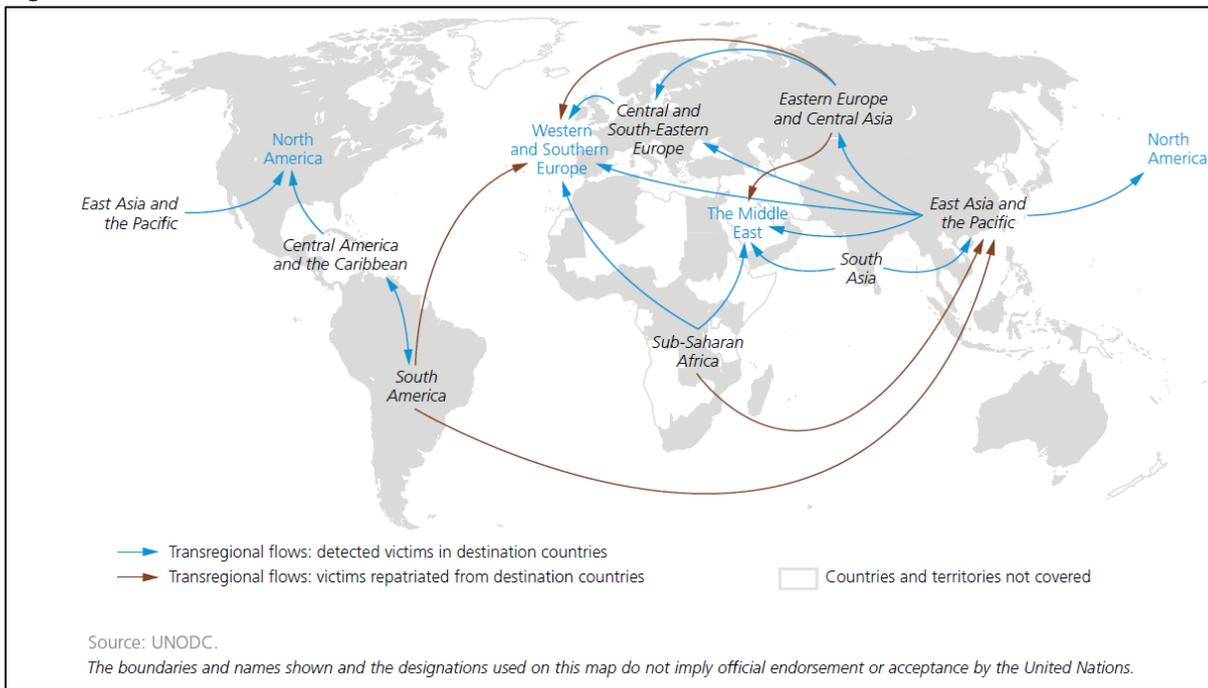
# 1. Introduction

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

At the same time, organized crime has also become a global enterprise profiting from the smuggling and trafficking of human beings. These and other crimes take advantage of more open borders and the increased flow of people, assets, goods, and services. The US State Department identified that human trafficking is the fastest growing criminal enterprise, and no country is immune from human trafficking either as a source, transit, or destination. The main transnational flows and destinations are shown in figure 1 below.

No one knows the full extent of human trafficking globally - it is widely recognized that one of the foremost challenges in developing targeted counter-trafficking responses and measuring their impact is the lack of reliable, high-quality information on the extent of the crime. However, in a recent [study](#)<sup>1</sup>, the UN International Organization for Migration (IOM) estimated that 50million people globally are living in Modern Slavery with 28million of those in forced labor. Most cases of forced labor (86%) are found in the private sector. Almost one in eight of all those in forced labor are children (3.3 million). More than half of these are in commercial sexual exploitation.

**Figure 1 Main transnational flows and destinations**



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.

<sup>1</sup> Global Estimates of Modern Slavery Report 2021, International Organization for Migration



Traffickers use different methods to transport their victims to the destination country, including international civil aviation. Statistics from the [Counter-Trafficking Data Collaborative](#), the first global data hub on human trafficking, shows that 80% of international human trafficking journeys cross through official border points, such as airports and land border control points. About 20% of official border control point crossings involved trafficked persons traveling by air. Therefore, while we do not know exact numbers, we do know that victims of human trafficking are passing through airports and travel on aircraft and are often “hidden in plain sight”.

The toll the COVID-19 pandemic exacted on the global economy has been significant, with the International Monetary Fund (IMF) estimating that median global GDP dropped by 3.9% from 2019 to 2020, making it the worst economic downturn since the Great Depression. Geopolitical tensions such as the conflict in Ukraine have led to the displacement of millions of people and have significantly increased the cost of food and energy for many around the world. These are ideal conditions for even greater exploitation and human trafficking.

In recent years, governments, law enforcement, international organizations and civil society have called for collaboration and coordination by working with the aviation industry 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, examples of good practice 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 civil aviation authorities, airports, ground handling agents 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 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 language.



Human trafficking is understood to consist of three key elements<sup>2</sup>:

- 1) **an action** or “what” is done (i.e., the recruitment, transportation, transfer, harbouring or receipt of persons);
- 2) **the means used** or the “how” is it done (i.e., 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 (i.e., for exploitation).<sup>3</sup>

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

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”*.<sup>4</sup>

## 4. The 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.

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

<sup>3</sup> 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.

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



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<sup>5</sup>

|                  | 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.

*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 traffickers.

*Transnationality:* SOM is always transnational, whereas human trafficking is not. Human Trafficking can occur regardless of whether victims are taken to another country or only moved from one place to another within the same country<sup>6</sup>.

## 5. The role of national governments

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".<sup>7</sup> They should have means to identify traffickers<sup>8</sup> and develop national guidance that includes 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.

A large number of governments 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.<sup>9</sup>

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

<sup>6</sup> Ibid

<sup>7</sup> Art. 2 of the Recommended Principles and Guidelines on Human Rights and Human Trafficking (<http://www.ohchr.org/Documents/Publications/Traffickingen.pdf>)

<sup>8</sup> 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.

<sup>9</sup> Guideline 4 of the Recommended Principles and Guidelines on Human Rights and Human Trafficking (<http://www.ohchr.org/Documents/Publications/Traffickingen.pdf>)



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.

Governments and law enforcement increasingly believe that aviation workers can play a role and assist national authorities in detecting and preventing human trafficking at airports and on aircraft, which may lead to the eventual apprehension and prosecution of traffickers.

An example of good practice in terms of governments mobilizing the aviation sector in the fight against trafficking is in the United States. The [Blue Lightning Initiative \(BLI\)](#) is an element of the Department for Homeland Security (DHS) [Blue Campaign](#), led by the Department of Transportation (DOT) and U.S. Customs and Border Protection (CBP). Details are shown in the text box on page 11.

## 6. Data collection

There are no exact statistics on the extent of human trafficking. However, the IOM estimates that annually 28million people are victims of slavery.

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. 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.



### **Example of government good practice: Blue Lightning Initiative, USA**

The Blue Lightning Initiative (BLI), led by the U.S. Department of Transportation and U.S. Customs and Border Protection, is an element of the U.S. Department of Homeland Security's Blue Campaign.

BLI trains aviation industry personnel to identify potential traffickers and human trafficking victims, and to report their suspicions to federal law enforcement. To date, over 110 aviation industry partners have trained more than 200,000 employees through BLI, and actionable tips continue to be reported to law enforcement.

#### **BLI Training Module**

The FAA Extension, Safety, and Security Act of 2016, requires air carriers to provide initial and annual flight attendant training regarding recognizing and responding to potential human trafficking victims. The FAA Reauthorization Act of 2018 expands the requirement to include "ticket counter agents, gate agents, and other air carrier workers whose jobs require regular interaction with passengers on recognizing and responding to potential human trafficking victims." Becoming a BLI partner and using the virtual training is a simple and responsible way to adhere to these requirements.

The BLI training was developed based on feedback from aviation industry experts and human trafficking survivors. The training is 25 minutes in length, and is comprised of four lessons that include:

- What is Human Trafficking?
- Indicators of Human Trafficking Activity
- Reporting Suspected Human Trafficking
- Indicator Challenge
- How Does the Blue Lightning Initiative Work?

Participating BLI partners instruct their employees using the BLI virtual training module and associated printed educational materials. The training may be integrated into partners' initial or refresher training for flight attendants, pilots, customer service representatives, and other aviation industry personnel.

The BLI training illustrates common indicators of trafficking that aviation employees may encounter, and how to immediately report suspected trafficking to law enforcement. The BLI's real-time reporting mechanism gives law enforcement the ability to research and analyse information, and to coordinate an appropriate and effective response. To alert authorities about suspected trafficking, as outlined in the BLI training, airline employees can follow their airline's in-flight reporting protocol or call the Immigration and Customs Enforcement Homeland Security Investigations Tip Line.

Further details and resources can be found here: <https://www.dhs.gov/blue-campaign/blue-lightning-initiative>

## 7. Human trafficking and the airline industry

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, including check-in and gate agents, security screeners and cabin crew, can be an important source of tip offs for law enforcement when they are trained to detect behaviours that are often associated with human trafficking situations.

Governments, regulators, NGOs, and civil society are increasingly calling for more airlines to act. 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:

### Airlines are increasingly required to comply with anti-trafficking legislation

- In 2016, the US Congress mandated US airlines to provide initial and recurrent human trafficking awareness training to cabin crew. This has since been expanded to include all public facing aviation staff. More governments are likely to follow suit, especially as ICAO has published Doc 10171 *A Comprehensive Strategy for Combatting Human Trafficking in the Aviation Sector* as a complement to Standards and Recommended Practices of ICAO Annex 9 *Facilitation* to inform the development of counter-trafficking strategies.
- 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 UK and international airlines are affected. Awareness training and other anti-trafficking activities are an important aspect in demonstrating ongoing compliance.
- Australia implemented similar legislation in 2018 with more countries expected to introduce similar legislation especially in response to targets set out in the UN Sustainable Development Goals 2030.

### Recent investigations indicate a clear link between human trafficking and international terrorism where trafficking is used as a means of funding terrorism.<sup>10</sup>

- Terrorism against civil aviation is a constant threat to airlines.
- Preventing trafficking may indirectly deter or reduce the ability of terrorists or criminal groups seeking to take advantage of aviation, thus mitigating risk.

### Consumers and investors are increasingly demanding that commercial organizations demonstrate commitment to sustainability and to being "good corporate citizens".

- Anti-trafficking initiatives can be an integral part of sustainability and Corporate Social Responsibility (CSR) and/or Environmental Social and Governance (ESG) activities.

These elements highlight why it is in the interests of the airline industry to support law enforcement by training staff to be able to identify the behaviours associated with potential trafficking and reporting their suspicions to authorities.

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<sup>10</sup> "Trafficking Terror, How Modern Slavery and Sexual Violence Fund Terrorism", Nikita Malik (2016), Henry Jackson Society



To support member States the International Civil Aviation Organization (ICAO) has developed [Circular 352 Guidelines for Training Cabin Crew on Identifying and Responding to Trafficking in Persons](#). It is recommended that carriers refer to Circular 352 in addition to this guidance when developing, reviewing or benchmarking training relating to anti-trafficking initiatives.

A further critical issue for airline staff, particularly cabin crew who may identify potential trafficking onboard flights, is the lack of a standardized methodology for the timely reporting of suspected cases to national law and enforcement agencies around the world (i.e., to whom and how do they report suspicions). Inconsistencies in the methodology might also compromise the anonymity and de-identification of the procedure, which could in turn result in deterring cabin crew reporting. Similarly, governments have not shared protocols for the handling of suspected victims or traffickers after landing. To assist States in this regard, ICAO and OHCHR developed [Circular 357 Guidelines for Reporting Trafficking in Persons by Flight and Cabin Crew](#).

Airlines are urged to refer to this important guidance that sets out roles and responsibilities, advice on discrete air to ground communications procedures and a template reporting form that airlines may wish to adapt to their own operational procedures.

To meet requirements set by government, airlines, in collaboration with regulators should develop 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,<sup>11</sup> proposes a draft checklist in Annex 3 to this document that could be adapted to each airline's policy.

## 8. Preventing trafficking activities

In the aviation environment, prevention of human trafficking begins on the ground by detecting potential behaviours that are consistent with suspected trafficking 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 to implement and standardize national reporting protocols and related responses. At the same time guidance provided by government agencies will enable a coordinated approach by the aviation industry and result in significant improvements to the prevention of human trafficking.

## 9. Establishing an airline policy on human trafficking

Airlines should develop a specific and detailed company policy for the consistent handling 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

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<sup>11</sup> <https://www.baliprocess.net/>



- Encouraging ground and cabin staff to report suspected human trafficking signs detected at check-in, boarding gate and on board
- Recommending staff pay particular attention to suspected signs 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).

## 10. Communication of the policy

It is recommended that the company policy related to anti-trafficking activities be communicated throughout the organization and especially to public-facing 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 legal support and protection of anonymity of employees acting lawfully and in good faith to ensure safe and secure flight operation.

## 11. 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 to encourage possible victims to ask staff for help, such as codeword schemes
- Procedures for the management of possible victims of trafficking
- Communication and coordination with responding agencies
- Prevention strategies
- Reporting of suspected victims.

Note should be taken to the importance of awareness and training of flight crew on human trafficking. This is essential to ensure the timely communication of any cases of suspected cases to law enforcement via the



carriers' network operations, local station representative and/or air traffic control. Pilots are positioned behind locked cockpit doors, so knowledge of human trafficking and effective communication with cabin crew is essential.

Airlines should also determine a process to liaise with local authorities through assigned responsibilities on board, at the main base and the outstations.<sup>12</sup> 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. The procedure should be as streamlined as possible to avoid burdening operational staff while encouraging the reporting of possible cases.

## 12. Identifying suspected trafficking activities: key indicators

Recognizing behaviours typically associated with suspected human trafficking is the first step in identifying suspected victims and may potentially lead to interventions that ensure a person avoids slavery and may lead to the prosecution of perpetrators. IATA has developed [comprehensive training](#) on human trafficking 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 person appear to have suffered injuries as result of an assault or aggression?
5. Does the person 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 person (especially children) accompanied by someone claiming to be a parent or guardian who is in fact not related to the child?
7. Is the person in control of their own travel documents?
8. Does the person appear to be coached on what to say? Does the potential trafficker appear to have rehearsed what to say in relation to the victim?
9. Does the person have freedom of movement?
10. Does the person avoid eye contact? Or on the contrary, do they try to establish eyes contact?
11. Does the person have few or no personal possessions?
12. Are the answers provided by this person consistent?
13. Is the person branded with tattoos indicating adherence to somebody else?

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<sup>12</sup> This could also be a departmental function whether the airline prefers to avoid key person dependency.



14. Does the person provide inconsistent responses from the person(s) travelling with him/her when asked questions?
15. Is the person 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. Is this person speaking of living in the same household of employer, being in debt to employer, living under inhumane conditions (cramped spaces, etc.)?
18. 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 to establish a case of potential trafficking.

## 13. Concept of “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.

Under no circumstances should the safety of the suspected victim, ground staff and crew be compromised. If a ground staff or cabin crew member identify behaviours which are consistent with suspected 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).

## 14. Cabin crew: detection and reporting procedures

Airline staff need to be cautious and ensure they do not act on behalf of law enforcement agents. This is a safety and security issue that must be managed carefully.

The handling of suspected trafficking is unlike other cabin safety procedures such as those relating to the handling of unruly and disruptive passengers. In unruly passenger incidents, an offense may have been committed and thus the passenger can be delivered or disembarked to local law enforcement under the authority of the aircraft captain. However, all that is being reporting in cases of suspected trafficking is observed behaviours - no offense is committed onboard the aircraft, but the observed behaviours may help to stop a case of trafficking and/or prosecute criminal activity relating to trafficking in the origin or destination country. For this reason, it is essential that law enforcement is informed to determine their response. Airlines should not request law enforcement to attend the aircraft upon landing.

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

- Check without being noticed whether there are any trafficking signals
- Solicit other staff members to check these signals to validate these concerns
- Assess whether the person tries to establish eye contact or on the contrary avoids looking at you
- Try to initiate informal conversation asking questions such as:
  - Where are you flying from?
  - Why are you travelling?



- Are you visiting relatives?
- Where are you staying?
- Who will be meeting you?
- What are your plans?
- Note seat number and passenger name record (PNR) information, if available
- If the victim is accompanied, note if the companion is nervous, prevents the child/person from answering questions, is rude or evasive
- Assess the situation with other cabin crew members and your supervisor
- Contact the pilot in-command and inform them of suspicions
- Be cautious and do not act on behalf of law enforcement
- Assess the level of threat and apply airline procedures
- Continue assessing the situation and report additional details to the pilot-in-command.

The above are the steps recommended when a suspected case is detected. The response by law enforcement after landing may vary. Cabin crew should not expect law enforcement to act immediately or to intervene directly, as sometimes a route may already be in the process of being monitored at a higher level and immediate action may jeopardize a larger initiative. However, airlines may need to adapt internal guidance based on their own needs and expectations.

## 15. Communication protocols

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

Once the suspected victim is identified, the cabin crew should 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 suspected 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.

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.

## 16. 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. 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 are employed.



## 17. Examples of airline good practice

### Delta Air Lines, United States

Delta condemns all forms of human rights abuses, including human trafficking and sexual exploitation of children and is committed to fighting these abuses. These principles flow directly from Delta's Code of Ethics and other core guiding documents. As a transportation company, Delta works to be sure that our supply chain is free of products made with forced labor but focuses efforts on preventing Human Trafficking.



#### Fast Facts – Anti-Human Trafficking efforts

- Training – More than 56,000 Delta employees have received training to detect and report human trafficking. Delta reports suspected instances of human trafficking to the DHS through their Blue Lightning Program.
- Volunteering – Delta encourages employees to volunteer at local nonprofits for victims of human trafficking by providing one paid day of volunteerism each year.
- Lobbying – Delta has lobbied in the past on legislation to support anti-human trafficking efforts and the victims of human trafficking since 2017.
- In 2022, Delta supported S.2991 the Countering Human trafficking Act of 2021 and H.R.7181 the Human Trafficking Prevention Act of 2022.
- Educating Customers – Each January during Anti-Human Trafficking month, Delta shows a video highlighting to the issue to all customers. This video will be updated for January 2023's Anti-Human Trafficking month.
- Creating Partnerships – Delta has partnered with Polaris to fund their National Human Trafficking hotline and with Wellspring Living in Atlanta which supports the victims of human trafficking.

#### [Online Statements:](#)

##### Anti-Slavery and Anti-Human Trafficking Statement

Delta condemns all forms of human rights abuses, including human trafficking and sexual exploitation of children. Delta fully supports and respects the principles set forth in various modern slavery and anti-human trafficking laws, which are consistent with our core values and commitment to corporate citizenship. We take the responsibility as a global citizen seriously and are proud to continue taking action to be the leading force against human trafficking in the airline industry.

##### Our Supply Chain and Supplier Due Diligence

Delta is firmly committed to social responsibility in all our operations, including where we depend on people outside of our organization. Delta's Supply Chain Management professionals operate at a level befitting a global airline leader, following rigorous internal material standards for sourcing, procurement and selection of our suppliers and business partners. Our strategic sourcing process defines how we work with suppliers to ensure that they are operating to our standards. This includes a due diligence policy to screen all key suppliers for potential environmental, social and governance (ESG) risk factors. We follow this process to eliminate any



potential negative impacts of our global supply chain. Through our Supplier Code of Conduct and Supplier Sustainability Guidelines, we hold our suppliers to the same high standards that we apply to ourselves, requiring adherence to operational ESG requirements and use of mechanisms for monitoring, reporting and correcting ESG issues.

### Commitment to Combat Modern Slavery

Delta gives life to its commitment to combat modern slavery through policies, the direct and strategic support of leadership, support of anti-trafficking legislation, employee training, customer engagement, strategic partnerships, and opportunities for employees to volunteer.

Delta requires that its employees refuse to take part in activities that cause or further human trafficking violations or sexual exploitation of children. Delta prohibits the use of company facilities, resources, equipment or travel privileges for activities that support human trafficking or the sexual exploitation of children. This includes any use of company computers, networks, phones or other equipment for the viewing, storage, distribution, promotion or other use that sexually exploits children. Employees who participate in human trafficking activities or the sexual exploitation of children will be subject to termination from employment. Delta requires that employees report to managers, supervisors or local authorities, as appropriate, any passenger or employee believed to be engaged in human trafficking activities or the sexual exploitation of children. Delta has provided specific training to all flight crew members and gate agents on the procedures to be followed if witnessing suspected indicators of trafficking either in flight, in the airport, or at home.

Delta has established a cross-divisional human trafficking advisory council, comprised of senior leaders from Airport Customer Service, Corporate Communications, Flight Operations, Global Distribution, Human Resources, In-Flight Services, Legal, Marketing and Technical Operations. The advisory council conducts extensive reviews of opportunities to leverage resources and play a large role in the fight against trafficking around the globe. Delta's #GetOnBoard campaign is a global initiative to encourage employees and customers to join the fight. Delta also partners with anti-trafficking experts at Polaris, a nonprofit dedicated to combatting human trafficking, to raise awareness and shed light on how the airline industry can be exploited to facilitate such activity. Delta worked with Polaris to develop anti-trafficking training specifically for airline employees. The training equips Delta's employees to identify signs of potential trafficking cases through data-based examples of trafficking in transportation scenarios.

Delta encourages its employees to sign up for volunteer opportunities in cities across the U.S. to support survivors. In addition, customers are engaged to support the fight by donating miles to Polaris through the Delta SkyWish Program. Donations from the extended Delta family provide critical care to victims and survivors, return them to a place of safety and reunite them with families. Delta also hosts an apprenticeship for survivors through the anti-trafficking group Wellspring Living in support of rehabilitation and to create career opportunities in the workforce.

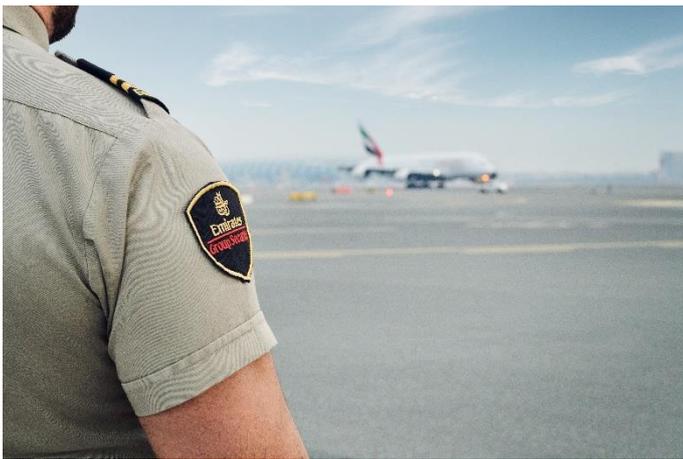
As part of Delta's commitment to raise awareness among employees, suppliers and customers, Delta has signed the International Code of Conduct outlined by End Child Prostitution, Child Pornography, and Trafficking of Children for Sexual Purposes (ECPAT). We are committed to fully complying with all applicable criminal laws and regulations regarding the prevention and reporting of violations related to human trafficking and sexual exploitation of children, including child prostitution and child pornography. As the first airline in the world to sign the Code, Delta is proud to pioneer the way for other US airlines and businesses to join the fight against sexual exploitation of children and adults.

Delta is a founding member of the Global Business Coalition against Human Trafficking (gBAT), a group that mobilizes the expertise, resources, and voices of coalition members to fight against all forms of human trafficking. Delta is also a member of the Transportation Leaders against Human Trafficking (TLAHT), a U.S. Department of Transportation initiative designed to maximize the transportation industry's collective impact on human trafficking.

## Emirates, United Arab Emirates

Since 2016, Emirates has actively engaged with staff and industry stakeholders to develop effective mechanisms to tackle human trafficking in aviation. Internally, a zero-tolerance approach to modern slavery has been adopted and formulated into a specific company policy. The policy contains general principles, scope, guidelines, communication and awareness-building expectations and implications for breaches of the policy.

Along with the policy and awareness-building materials, channels for reporting about modern slavery have been promoted and staff are encouraged to report suspicions via several channels including an internal whistleblowing programme.



Concerning training, Emirates developed awareness-building courses with practical examples and specific indicators to help front-line staff — such as cabin crew, ground staff, and flight deck crew — recognize the signs of human trafficking. By December 2022, over 32,000 staff have completed the training. The subject of human trafficking has also been included in the annual licensing training for aircrew.

Consequently, after releasing the training, the airline has seen an increase in staff reporting suspicions of trafficking from the line. In addition, the airline conducts periodic webinars for aircrew and airport

customer-facing staff, aimed at sharing best practices and case studies, and building on existing awareness.

Emirates also has a dedicated Airport Security Unit with a large team of trained aviation security personnel. The unit is tasked with spotting travel irregularities, including potential human trafficking activity.

To spread awareness among the travelling public, Emirates supported the It's a Penalty campaign by showing the film "What is Human Trafficking?" on their inflight entertainment system. The short film features Liam Neeson and is designed to educate the world about misconceptions and the reality that human trafficking and exploitation happens globally.

The airline also organizes and participates in many industry events to share knowledge, experience, and best practices in the domain of modern slavery. Some of the more recent events include:

- A National Workshop on the Detection of Potential Trafficking in Persons at Air Borders in Algeria in February 2023
- The Interregional Meeting on Combatting Trafficking in Persons by Air at Expo 2020 Dubai
- A workshop on human trafficking at AVSEC Global Symposium 2021 and 2019 with the participation of UNODC and ICAO
- Specialized training on trafficking in persons for airport officers in Kenya organized by the UNODC
- Participation in a workshop organized by the UK Modern Slavery Training Delivery Group and IATA in Cardiff in 2018, which led to the development of a guide for the aviation industry on human trafficking.

## Malaysia Airlines

### Introduction and Policies

Malaysia Aviation Group's (MAG) which is the parent company of Malaysia Airlines has a zero-tolerance policy prohibiting human trafficking and smuggling in any form and manner within its business operations. This policy applies to all MAG personnel, business partners, vendors and any persons working for MAG or on its behalf in any capacity ('third parties'). This is clearly embedded in the Code of Business Conduct and Supplier Code of Conduct.



These policies are reviewed consistently and systematically, to ensure that the relevant clauses and updates related to modern-day slavery are included in our policies. We undertake to review policies, examine supply chains, and increase the levels of awareness amongst staff. Group Business Integrity is at the forefront leading the organization in strategizing and implementing the necessary action plans in combating human trafficking.

### Our Efforts

MAG works very closely with airport authorities and various governmental bodies to ensure strict compliance to its modern-day slavery policy in all aspects of the business.



*Collaboration with Malaysian enforcement agencies in combating human trafficking issue.*

### Our People

MAG promotes the value of respect amongst staff. It is embedded in the Code of Business Conduct and staff are expected to treat their colleagues with professionalism, free of harassment and discrimination. The Group prioritise the health and safety of employees and has a dedicated Corporate Safety Oversight team to implement robust policies supporting this.

MAG also has a very strong and dedicated Works Council to provide employees with a platform to raise their concerns and addressed professionally. Further to this, it also has an avenue for employees to whistleblow or report matters in a private and confidential manner. Group Business Integrity reporting directly to the Board of Directors is tasked to handle every issue raised through this channel, with confidentiality and integrity.

### Employee Awareness and Engagement

On 15 November 2017, MAG organised an Anti-Human and Anti-Wildlife Trafficking Roadshow at the Kuala Lumpur International Airport (KLIA) to launch and declare its zero-tolerance policy against human and wildlife trafficking. This event was attended by Her Excellency Madam Kamala Shirin Lakdhir, the United States Ambassador to Malaysia. Aside from MAG employees, NGO's and agencies such as the Anti-Smuggling of Migrants Council of the Ministry of Home Affairs, Immigration Malaysia, Malaysia Royal Police Force, Malaysia Royal Customs were also invited to this event.



*The launch of MAG Anti-Human and Wildlife Trafficking Roadshow in Kuala Lumpur International Airport (KLIA) organized by MAG in collaboration with Malaysia Airports.*

On 3 August 2022, MAG organized its first Aviation Against Trafficking in Persons Conference in conjunction with World Day Against Trafficking in Persons 2022. This conference was organized in collaboration with Stop Human Trafficking Association (SHUT), a non-profit organization combatting human trafficking. This event was held in Malaysia Airlines training academy, attended by 500 attendees comprising of Malaysia Airlines staff, Firefly, MASWings, Aerodarat Services (MH ground staff), law enforcement agencies, Civil Aviation Authority Malaysia, Malaysia Airports representatives, representatives from International Organisation of Migration (IOM), and other non-government organisations combating human trafficking. This conference was officiated by the Malaysia Minister of Home Affairs and graced by the Malaysia Deputy Minister of Transports.



*Description: The Aviation Against Trafficking in Persons Conference in conjunction with World Day Against Trafficking in Persons 2022.*

MAG recently signed a Memorandum of Understanding (MOU) with SHUT to develop role-specific training modules on anti-human trafficking and conduct trainings on victim identification in the airport, onboard and within supply chains.



*Description: MOU signing ceremony between Malaysia Airlines and SHUT*

MAG is also committed to organizing awareness programmes and providing training to frontline teams, especially ground services staff, flight, and cabin crew members, on victim identification. The process of reporting possible victim and guidance on the matter is clearly outlined and made available to all staff. Trainings on victim identification crew and ground staff are conducted on an annual basis.



*Description: Training sessions on victim identification for crew and ground staff*

### **Supply chains**

Goods or services sourced by MAG come from various parts of the world. The Group Procurement team is responsible to engage with various vendors, suppliers, and other business partners to fulfil the requirements of business operations. The Group Procurement team has a responsibility to screen and conduct background research of potential vendors, suppliers, and business partners before entering into contractual agreements with these parties. Some of the major factors taken into consideration in screening and background research include the origins of vendors or suppliers and whether they are from high-risk areas, any involvement in human trafficking or wildlife trafficking and any involvement in modern day slavery or child labour. MAG also subscribes to a database which provides a list of goods and service providers that compliant with modern day slavery regulations.

Further to this, Group Procurement requires vendors or suppliers to mandatorily sign a Supplier Code of Business Conduct upon signing any service agreements to adhere to MAG business regulations which includes a zero-tolerance to modern day slavery.

### **Next Steps**

MAG remains steadfast in its zero-tolerance policy against modern day slavery. Future initiatives on the matter include:

- Continuous awareness and training sessions to all staff at all levels, within the Group
- Distribution of modern-day slavery awareness materials to staff who work at identified high risk areas
- Building partnerships with relevant organisations and enforcement agencies on modern day slavery and to stay abreast on latest developments on the matter
- To ensure all current and future suppliers and business partners sign the Supplier Code of Conduct
- To consistently review and update crew manuals on procedures for identifying potential cases of human trafficking on flights
- To commit building a sustainable mechanism in auditing supply chains to disrupt modern slavery supplies within their business operations
- Leveraging the **oneworld** alliance to drive for SEDEX (a platform widely used within the **oneworld** alliance) to provide a risk identification function and for the creation of integrated supplier risk ranking methodology



## 18. Conclusions

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

Airlines may be required to implement anti-trafficking activities by government laws and/or regulations. While the airline industry is committed to support anti-human trafficking efforts, carriers 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 individuals. Instead, it will be the culmination of efforts from a global community that refuses to allow it to continue”.*

## 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](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>

### International Civil Aviation Organization (ICAO)

- Circular 352 - Guidelines for Training Cabin Crew on Identifying and Responding to Trafficking in Persons [https://www.icao.int/Meetings/FALP/Documents/FALP11-2020/Cir352/Cir352\\_en.pdf](https://www.icao.int/Meetings/FALP/Documents/FALP11-2020/Cir352/Cir352_en.pdf)
- Circular 357 - Guidelines for Reporting Trafficking in Persons by Flight and Cabin Crew <https://www.icao.int/safety/airnavigation/OPS/CabinSafety/Documents/Circ.357.EN.pdf>
- Document 10171 - A Comprehensive Strategy for Combating Human Trafficking in the Aviation Sector [https://www.icao.int/Meetings/FALP/Documents/FALP12-2021/WP/WP4/WP4\\_WG%20Human%20Trafficking\\_clean%20copy.pdf](https://www.icao.int/Meetings/FALP/Documents/FALP12-2021/WP/WP4/WP4_WG%20Human%20Trafficking_clean%20copy.pdf)

### 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](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](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](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: Be Aware of the Signs – UNODC Campaign



**UNODC**  
United Nations Office on Drugs and Crime



**Safety on board**  
Please do not remove this card from the aircraft  
**B747-8**

**#BeAwareOfTheSigns**  
Pay attention to these human trafficking indicators

Blue Heart campaign against human trafficking  
Mexico - 2.0 version  
Coming soon!



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.

## Annex 3: Airlines Assessment Form (example)

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| <div style="text-align: center;">  <br/>  <br/> <small>REGIONAL SUPPORT OFFICE<br/>THE BALI PROCESS</small> </div> <p style="text-align: center;"><b>Identifying and Reporting TIP Activities</b><br/><b>An Assessment Form for Airline Staff</b></p> <p style="text-align: center;">Definition</p> <p style="text-align: center;">Indicators</p> <p style="text-align: center;">Reporting</p> <p style="text-align: center;">Referral</p> | <p><i>Definition</i></p> <p><b>What is a TIP activity?</b></p> <p>Trafficking in persons (TIP) is a criminal offence under US legislation and international law, comprising of:</p> <ol style="list-style-type: none"> <li>1. <b>Action</b> – recruitment, <i>transportation, transfer, harbouring or receipt of persons</i></li> <li>2. <b>Means</b> – threat, use of force, coercion, abduction, fraud,</li> <li>3. <b>Purpose</b> – for exploitation, e.g. commercial prostitution, forced labour, illegal adoption, fraudulent marriage, and organ trade</li> </ol> <p>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.</p> <p>Be cautious and <b>do not</b> try to act on behalf of law enforcement, leave it to the professionals when it comes to safety and security aspect of criminal matters.</p> <p>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.</p> | <p><i>Protocols</i></p> <p><b>Date:</b></p> <p><b>Operator:</b></p> <p><b>Flight:</b></p> <p><b>PNR:</b></p> <p><b>Seat:</b></p> <p><b>1. Look for TIP signals:</b></p> <p><input type="checkbox"/> Passenger is disoriented, confused, or showing signs of mental/physical abuse</p> <p><input type="checkbox"/> Passenger is fearful, timid, or submissive</p> <p><input type="checkbox"/> Passenger shows signs of having been denied food, water, sleep, or medical care</p> <p><input type="checkbox"/> Passenger suffers injuries as a result of an assault or aggression</p> <p><input type="checkbox"/> Passenger is accompanied by someone to whom they defers or someone who seems to be in control of the situation</p> <p><input type="checkbox"/> Passenger is accompanied by someone claiming to be a parent or guardian who is in fact not related to the passenger</p> <p><input type="checkbox"/> Passenger is not in control of their own travel document</p> <p><input type="checkbox"/> Passenger appears to be coached on what to say</p> <p><input type="checkbox"/> Passenger's freedom of movement is strangely restricted or limited while on board</p> <p><input type="checkbox"/> Passenger avoids eye contact</p> <p><input type="checkbox"/> Passenger tries to establish eyes contact</p> <p><input type="checkbox"/> Passenger is branded with unusual tattoos:</p> <p style="padding-left: 20px;"><input type="checkbox"/> Large initials on their face</p> |
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| <p><b>Protocols</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Initials near their crotch</li> <li><input type="checkbox"/> Names across their thighs</li> <li><input type="checkbox"/> A bar code across their wrist</li> <li><input type="checkbox"/> Passenger provides answers inconsistently             <ul style="list-style-type: none"> <li><input type="checkbox"/> about themselves</li> <li><input type="checkbox"/> about passenger(s) travelling with them</li> </ul> </li> <li><input type="checkbox"/> Passenger does not wear appropriate clothes for the route of travel or weather</li> <li><input type="checkbox"/> Passenger speaks of modelling, dancing, singing, hospitality job or something similar in a foreign country</li> <li><input type="checkbox"/> Passenger travels to work at their destination but knows a few details about the job</li> <li><input type="checkbox"/> Passenger does not know who will be meeting them upon arrival</li> <li><input type="checkbox"/> There are other unusual circumstances that does not feel right to you (please list):</li> </ul> <hr/> <hr/> <hr/> <hr/> <hr/> <p><b>2. Initiate informal conversation asking questions such as:</b></p> <ol style="list-style-type: none"> <li>a. Where are you flying from?</li> <li>b. Why are you travelling?</li> <li>c. Are you visiting relatives?</li> </ol> | <p><b>Protocols</b></p> <ol style="list-style-type: none"> <li>d. Where are you staying?</li> <li>e. Who will be meeting you?</li> <li>f. What are your plans?</li> </ol> <p><b>3. If the passenger is accompanied, please check if the companion:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> is nervous</li> <li><input type="checkbox"/> prevents the passenger from answering questions</li> <li><input type="checkbox"/> is rude or evasive</li> </ul> <p><b>4. Cross-check with other staff members to confirm the above signals</b></p> <p><b>5. Report to and discuss with your supervisor, proceed if supervisor agrees to the above signals</b></p> <p><b>6. Contact the captain-in-command and inform them of results from assessment</b></p> <p><b>7. Assess the level of threat and apply airline's procedures</b></p> <p><b>8. Continue to assess the situation and report additional details to the captain-in-command</b></p> | <p><b>Referral</b></p> <p><b>Contacting authorities at the destination</b></p> <p>Prior to boarding/landing:</p> <p>Here details what airline staff should do. Steps to be determined between airlines and law enforcement authorities.</p> <p>After boarding/landing:</p> <p>Ditto.</p> <p>How to contact local authorities:</p> <p>Ditto.</p> <p>After reporting:</p> <p>Ditto.</p> |
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