



U.S Chamber of Commerce and Truckers Against Trafficking

Business Engagement

TOOLKIT

For the Transportation
and Energy Industries



U.S. Chamber of Commerce

Introduction

Human trafficking is a transnational crime encompassing forced labor and commercial sexual exploitation. Traffickers use violence, manipulation, and false promises to lure their victims into modern-day slavery while generating billions of dollars per year in illicit profit.¹

Businesses play a critical role in helping mitigate this heinous crime by training their employees on how to recognize and report human trafficking indicators, recovering victims, and disrupting trafficking networks while demonstrating their commitment to community safety.

The U.S. Chamber of Commerce, the world's largest business federation representing the interests of more than 3 million businesses of all sizes, sectors, regions, and 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 highlight best practices and share resources to engage the business community in helping end this crime.



LEADING BY EXAMPLE: PHILLIPS 66

Phillips 66 has helped TAT educate more than 18,500 energy industry employees about human trafficking and how to report it effectively. Phillips 66 has distributed wallet cards and hard hat stickers with information about human trafficking to its employees, raised awareness through the Employee Resource Groups, and hosted educational sessions with TAT at contractor and employee meetings. Phillips 66's Code of Business Ethics and Conduct demonstrates its commitment to combating human trafficking.



Best Practices

EDUCATE EMPLOYEES ABOUT HUMAN TRAFFICKING

Companies should integrate human trafficking awareness into their operations to show how forced labor and sexual exploitation impact industries and society. Employers should train their employees on human trafficking indicators and have reporting protocols in place so that if trafficking is suspected, employees know what steps to take.

ADOPT AN ANTI-HUMAN TRAFFICKING POLICY

Companies should develop and implement a policy to ensure that they are not complicit in any practice that may constitute trafficking. This policy should apply to contractors, subcontractors, suppliers, vendors, and others.

The policy should forbid individuals from using company time, resources, and funds to view sexually explicit content or procure sex acts. It should also state that the company prohibits the use of forced labor, misleading or fraudulent practices in recruiting candidates, and coercive tactics such as confiscating identity documents (e.g., passports and immigration papers).

The policy should be conveyed in writing, outline reporting procedures, and detail consequences for violations (see Appendix A for the model policy).

IDENTIFY SPHERES OF INFLUENCE TO RAISE AWARENESS

Companies should evaluate their assets and leverage their business connections to promote awareness. For example, companies that sell products or provide services are well positioned to educate the public about the signs of trafficking. Companies lead by example by promoting their anti-trafficking work on their website, via social media, in sustainability reporting, and through partnerships with nonprofit organizations that are aligned with their operations and values. Trade associations host events and produce publications to educate their members on best practices.



LEADING BY EXAMPLE: FEDEX

FedEx has delivered human trafficking awareness training to more than 38,000 employees across the U.S. and Canada; made an educational resource available to approximately 80,000 drivers through its Qualified Driving Safety Program; featured human trafficking awareness at multiple FedEx events; hosted TAT's Freedom Drivers Project at a FedEx service provider summit; and implemented a robust anti-trafficking policy. FedEx uses its communications channels to distribute regular anti-trafficking messages, such as red flag indicators, to keep the issue fresh for its employees and networks.

Opportunities

TRUCKING



Members of the trucking industry have opportunities to witness trafficking on the road and in their communities. As traffickers keep their victims on the move, they travel on the same highways and visit the same truck stops and gas stations as drivers, thus creating multiple opportunities for victim identification by over-the-road drivers as well as truck stop and travel plaza employees. Final mile and in-home delivery drivers are uniquely positioned to be the eyes and ears of neighborhoods as their routes take them to homes, apartment complexes, and businesses.

SHIPPING AND MANUFACTURING



Because of complex supply chains, shipping and manufacturing companies are at risk of inadvertently engaging in trafficking. If companies have a transportation and logistics department, in all likelihood they move products through their own fleet of professional truckers, hire outside carriers, or use both. These companies and their employees are well placed to help ensure that the people moving their products are trained to recognize and report trafficking.



LEADING BY EXAMPLE: UPS

More than 150,000 UPS employees in North America have been trained to recognize and report human trafficking. Internal company policies prohibit employees from engaging in trafficking in persons, procuring sex acts, and using forced labor. UPS provides thought leadership on cross-industry initiatives, board service, ambassador training with its employees, and in-kind labor and support for TAT's Freedom Drivers Project. The UPS Foundation invests millions of dollars in organizations to combat human trafficking, support survivors, and educate the community.

MAKING A DIFFERENCE

Ballard Inc. driver Arian Taylor showed compassion and care as he helped a 19-year-old woman access a safe environment and services after escaping her would-be trafficker.



ENERGY

Employment in the oil and gas sector is cyclical where workers are often brought in from other states and localities for project-specific work. They are relocated temporarily, and once the project is completed a new traveling and contracted workforce is brought in. These workers have an opportunity to identify and report potential victims of human trafficking.



PASSENGER TRANSPORTATION

Bus operators, transit workers, and taxi and rideshare drivers may encounter trafficking victims during the recruitment, exploitation, exit, or recovery stages. Survivors in the U.S. reported that public buses, subways, long-distance buses, taxis, and rideshares were used in facilitating their exploitation and that buses and public transit provided a means of escape.



BRIDGESTONE

LEADING BY EXAMPLE: BRIDGESTONE AMERICAS

Bridgestone Americas has trained over 21,000 employees on how to recognize and report human trafficking, adopted an internal anti-trafficking in persons policy, and leveraged its extensive networks to raise awareness in the transportation industry about human trafficking throughout North America. TAT co-hosted an event with the company at Bridgestone Americas corporate headquarters in Nashville to strengthen local public-private partnerships to prevent and disrupt human trafficking. Bridgestone Americas partnership with TAT aligns with the Bridgestone E8 Commitment, showcasing eight abiding Bridgestone Americas values that drive the company's personal commitment toward advancing a sustainable society.

MAKING A DIFFERENCE

Quick action by Debo Adepiti and Alan Bailey, two TravelCenters of America employees, resulted in the arrest of three perpetrators and the recovery of 20 women being abused by a sex trafficking ring.

Get Involved

- ▶ Train all employees and managers to recognize human trafficking indicators.
- ▶ Adopt and communicate policies that stand against forced labor and sex trafficking, including purchasing sex.
- ▶ Extend policies and practices to supply chains.
- ▶ Evaluate spheres of influence (e.g., partnerships, contracts, associations, and networks) to spread awareness.
- ▶ Partner with law enforcement and government agencies to investigate human trafficking.
- ▶ Educate business travelers on how to detect signs of human trafficking while they are on the road, at rest areas, and at hotels, among other places.
- ▶ Post signage to highlight the National Human Trafficking Hotline to raise awareness and reach victims.
- ▶ Provide job training and employment opportunities for survivors.
- ▶ Partner with TAT to access free industry-specific resources and devise an effective anti-trafficking strategy.

MAKING A DIFFERENCE

After seeing a woman covered only in a towel standing along a remote stretch of mountainous highway, WinCo Foods driver Joe Aguayo called law enforcement personnel who recovered a trafficking victim who had been left in that area.

MAKING A DIFFERENCE

Under the guise of asking questions for a loyalty rewards program, Sapp Bros. cashier Jessica Chapman collected critical information on behalf of a woman being sexually exploited, which resulted in the arrest of the perpetrator.

Resources

- ▶ The U.S. Chamber of Commerce’s **Task Force to Eradicate Human Trafficking** 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. The task force raises awareness on how to prevent this heinous crime, engages in lobbying and advocacy efforts, and highlights the role of the private sector in providing employment opportunities to trafficking survivors that are sustainable in the long term.
<https://www.uschamber.com/major-initiative/task-force-to-eradicate-human-trafficking>
- ▶ TAT has a library of **free industry-specific training resources** for the transportation and energy industries.
<https://truckersagainstrafficking.org/get-our-materials>
TAT’s resources include documentary-style training videos, each between 15 and 30 minutes, intended for the trucking industry (e.g., over-the-road trucking, local delivery, movers and in-home delivery, and truck stops); the energy industry; and passenger transportation (e.g., motorcoach and transit, school bus, and rideshare). For these industries, TAT has an app, wallet cards, window decals, hard hat stickers, employee-focused posters, and victim-centered awareness materials.
- ▶ TAT’s free **Addressing Demand: Man-to-Man** resources delve into the attitudes, myths, and perspectives that contribute to the demand for commercial sex and fuel the crime of sex trafficking.
<https://truckersagainstrafficking.org/man-to-man-campaign>
By taking preventive action, companies can demonstrate high standards of business conduct and values while mitigating risk.
- ▶ TAT staff members provide **free consultation to transportation and energy companies** on how to launch or augment an anti-trafficking initiative. Contact info@truckersagainstrafficking.org to learn more.



Rental | Leasing | Logistics

LEADING BY EXAMPLE: PENSKE

As a diamond-level sponsor of TAT since 2020, Penske has trained over 11,000 drivers on how to recognize and report human trafficking, added TAT training to its onboarding for new drivers, and hosted TAT’s Freedom Drivers Project for multiple customers and employees at awareness events across the country. The company’s Human Trafficking and Modern Day Slavery statement outlines its zero-tolerance approach to human trafficking and its commitment to preventing human trafficking in its operations and supply chains.

Appendix A

MODEL POLICYⁱⁱ

Human trafficking is a crime involving the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for labor, services, or commercial sex through the use of force, fraud, or coercion or in which the person induced to perform a commercial sex act has not attained 18 years of age (22 U.S.C. § 7102(11)).

[Company] strictly prohibits and will not tolerate trafficking in persons and any other form of slavery, including sex and labor trafficking. This encompasses the following activities:

- ▶ Using forced labor in the performance of any work.
- ▶ Using or allowing the use of any of the [company's] facilities, resources, or equipment to support human trafficking.
- ▶ Using any [company] resources, including credit cards and expense accounts, to purchase sex.
- ▶ Creating, downloading, viewing, storing, copying, or transmitting content that is sexually explicit or sexually oriented during work hours, while traveling on business, while engaged in any work-related activities, or using [company] resources.
- ▶ Viewing and searching websites where adult entertainment is offered for sale or viewing and searching online advertisements for commercial sex during work hours, while working on company business, while engaged in any work-related activities, or using [company] resources.
- ▶ Destroying, concealing, confiscating, or otherwise denying access by an individual employee or contractor to the individual's identity or immigration documents.
- ▶ Using misleading or fraudulent practices during the recruitment of candidates or offering employment or contract positions.
- ▶ Entering into on behalf of the [company] or otherwise any business relationships or other arrangements with an organization that the employee has reason to believe participates in any way in human trafficking or the exploitation of humans.

REPORTING REQUIREMENTS

All employees have a responsibility to ensure that this policy is followed. Employees must be vigilant and immediately report, as appropriate, all situations that come to their attention on the [company's] premises or in its operations where human trafficking is suspected or appears to be intended. Concerns and potential violations should be reported to the [company point of contact].

The [company] strictly prohibits retaliation against any employee for making a good faith report of any potential or suspected violation of this policy or cooperating in any investigation of such violation.

VIOLATIONS OF THIS POLICY

Employees who violate this policy may be subject to disciplinary action up to and including termination.

Appendix B

COMPANY-WIDE APPROACH

Employees and managers should receive human trafficking awareness training. The following chart provides examples of where different components of a comprehensive anti-human trafficking strategy reside.

| HUMAN RESOURCES | SAFETY AND SECURITY |
|---|---|
| <ul style="list-style-type: none"> ▶ Incorporating human trafficking training into orientation. ▶ Adopting and implementing anti-human trafficking policies. ▶ Creating opportunities for employee donations to nonprofit organizations. ▶ Providing job training and employment for trafficking survivors. ▶ Sharing information and resources with networks. | <ul style="list-style-type: none"> ▶ Providing human trafficking education in safety meetings and other training. ▶ Adopting and implementing response protocols. ▶ Posting decals on vehicles and signage at worksites. ▶ Partnering with law enforcement. ▶ Preserving surveillance footage when trafficking is suspected. ▶ Sharing information and resources with networks. |
| LEGAL AND COMPLIANCE | IT AND CYBERSECURITY |
| <ul style="list-style-type: none"> ▶ Adopting and implementing anti-human trafficking policies. ▶ Conducting human rights compliance and due diligence audits with contractors, vendors, third parties, and others. ▶ Keeping current on all applicable regulatory changes and ensuring compliance with state, federal, and international laws and treaties. | <ul style="list-style-type: none"> ▶ Enforcing internal anti-human trafficking policies. ▶ Identifying indicators of trafficking that may present themselves on company IT and video surveillance equipment. ▶ Preserving surveillance footage in accordance with forensic best practices. |
| CORPORATE SOCIAL RESPONSIBILITY | EMPLOYEE RESOURCE GROUPS |
| <ul style="list-style-type: none"> ▶ Making internal recommendations based on global standards of social sustainability and human rights. ▶ Reporting on sustainability impact. ▶ Contributing to industry thought leadership. ▶ Sharing best practices internally and through external networks. ▶ Partnering with nonprofit organizations on anti-trafficking initiatives. | <ul style="list-style-type: none"> ▶ Enhancing human trafficking knowledge in the company, including through hosting webinars and panel discussions on human trafficking. ▶ Promoting efforts to provide job training and employment for trafficking survivors. |

| PROCUREMENT | LOGISTICS |
|--|--|
| <ul style="list-style-type: none"> ▶ Encouraging or requiring contractors, vendors, third parties, and others to train their workforces. ▶ Encouraging or requiring contractors, vendors, third parties, and others to adopt anti-human trafficking policies. ▶ Ensuring compliance with regulations. ▶ Sharing information and resources with networks. | <ul style="list-style-type: none"> ▶ Managing forced labor risks in supply chains. ▶ Activating supply chains for prevention and education. ▶ Introducing TAT to carriers (e.g., via bid meetings, carrier conferences, webinars, calls, and emails). ▶ Sharing information and resources with networks. |
| MARKETING AND COMMUNICATIONS | SALES |
| <ul style="list-style-type: none"> ▶ Promoting the company's commitment to combat human trafficking via social media and other public communications channels. ▶ Raising awareness through trade associations and at conferences. ▶ Using public-facing platforms to share victim-centered information. | <ul style="list-style-type: none"> ▶ Becoming educated about human trafficking as business travelers. ▶ Fostering client and customer relationships through shared social impact commitments. ▶ Understanding the incentives and requirements that clients and customers have in place for contractors, vendors, and third parties. |
| COMMUNITY ENGAGEMENT | GOVERNMENT RELATIONS |
| <ul style="list-style-type: none"> ▶ Providing philanthropic support to nonprofits. ▶ Partnering with nonprofits on events and initiatives. ▶ Organizing employee volunteer opportunities with nonprofits. | <ul style="list-style-type: none"> ▶ Developing and maintaining partnerships with law enforcement and government agencies. ▶ Supporting legislation and policies to advance efforts to prevent and disrupt human trafficking and provide opportunities for survivors. |

Appendix C

EMPLOYEE REPORTING PROTOCOL¹¹¹

All employees should make every effort to avoid causing harm to themselves and others when dealing with suspected cases of human trafficking. Many victims of human trafficking are unlikely to use the term **“human trafficking.”**

When any type of human trafficking situation is suspected, employees should note the following:

- ▶ Date, time, and location of the suspected incident.
- ▶ Description of the people involved (e.g., tattoos, physical identifiers, hair color and/or style, approximate age, and any overheard nicknames).
- ▶ A summary of the situation that prompted the report.
- ▶ Vehicle information if applicable (e.g., color, make, model, and license plate number).

Employees should assess the situation if they suspect any of the following scenarios, use a victim-centered approach that considers safety, and take the following steps to report and/or respond to the situation:

A HUMAN TRAFFICKING **VICTIM IS ALONE AND NOT ASKING FOR HELP**

- ▶ Report to dispatch, security, supervisor, and management at location as soon as it's safe to do so.
 - ▶ If an apparent minor, call 911 to report to law enforcement.
 - ▶ If an apparent adult, engage the person in a conversation asking simple questions. Are you OK? Do you want me to call someone for you?
 - ▶ Share the National Human Trafficking Hotline number: **888-373-7888**.
-

A HUMAN TRAFFICKING **VICTIM IS WITH A POTENTIAL TRAFFICKER AND NOT ASKING FOR HELP**

- ▶ Report to dispatch, security, supervisor, and management at location as soon as it's safe to do so.
- ▶ Call 911 to report to law enforcement if immediate danger is suspected.
- ▶ Do not approach suspected traffickers or attempt to intervene physically when a suspected victim is not seeking assistance.

A HUMAN TRAFFICKING **VICTIM** WHO IS **ALONE** AND **ASKING FOR HELP**

- ▶ To assess whether the individual wants assistance, ask simple questions. Are you OK? Do you want me to call someone for you?
 - ▶ Report to dispatch, security, supervisor, and management at location as soon as it's safe to do so.
 - ▶ Contact the National Human Trafficking Hotline number to arrange victim services: **888-373-7888**.
-

A HUMAN TRAFFICKING **VICTIM** WHO IS **WITH A POTENTIAL TRAFFICKER** AND DISCRETELY **ASKING FOR HELP**

- ▶ Report to dispatch, security, supervisor, and management at location as soon as it's safe to do so.
 - ▶ Call 911 to report to law enforcement when imminent danger is suspected.
 - Employees should never attempt to intervene physically in a human trafficking situation.
 - Employees should never indicate to a potential trafficker that authorities are being notified.
-

A HUMAN TRAFFICKING **RECRUITER** IS LOITERING AND APPROACHING PEOPLE OR POSTING SUSPICIOUS ADVERTISEMENTS

- ▶ Report to dispatch, security, supervisor, and management at location immediately as soon as it's safe to do so.
- ▶ Contact the National Human Trafficking Hotline number: **888-373-7888**.

ENDNOTES

- i. U.S. Department of Homeland Security, *What is Human Trafficking?*
<https://www.dhs.gov/blue-campaign/what-human-trafficking>
- ii. Policy template based on the sample policy developed by the U.S. Department of Transportation Advisory Committee on Human Trafficking and included in its final report, *Combating Human Trafficking in the Transportation Sector*.
<https://www.transportation.gov/stophumantrafficking/acht>
- iii. Sample protocol based on the employee section of the Human Trafficking Response Procedure Template developed by the Florida Department of Transportation's Statewide Transit Training and Technical Assistance (STTAT) Program and Truckers Against Trafficking. The full protocol template, which provides additional background information and outlines procedures for dispatch and supervisors, is available at this resource, "Human Trafficking Response Procedure Template."
<https://ftson.org/human-trafficking-response-procedure-template>

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