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HUMAN TRAFFICKING: MODERN SLAVERY & AVIATION



STOWAWAY INCIDENTS: FROM GUAYAQUIL TO NAIROBI







## HUMAN TRAFFICKING:

## THE AIRLINE INDUSTRY RESPONSE

Connecting over four billion passengers on 20,000 city pairs annually, aviation is often referred to as the business of freedom. But the ease and speed of air travel can also be misused by criminals who want to deny freedom to others through the crime of human trafficking. With an estimated 24.9 million people globally being trafficked each year, **Tim Colehan** reveals the measures that the global airline industry is taking to help governments and law enforcement to end the misery of human trafficking.

n 31 August 2017, Denice Miracle, an American Airlines customer service agent became suspicious of two teenage girls, aged 15 and 17, as they checked in for a flight at Sacramento Airport in the United States. Ms Miracle, having been trained in human trafficking awareness, immediately felt there were warning 'indicators' that something was just not right: there was no adult travelling with them; they had no identification; the tickets were one-way; they were booked in first class; and the credit card used to reserve their seats was in neither of their names and was fraudulent. Ms. Miracle contacted the Sacramento County Sheriff's Department Airport Bureau and explained the situation and told the girls they would not be able to fly.

Investigations found that, having met a man they knew as 'Drey' on Instagram, the girls were invited to New York for the weekend to earn US \$2,000 (approx. £1,450) for modelling and appearing in music videos. They went to the airport without their parents' knowledge. They told deputies they believed that Drey had booked return tickets. Attempts by law enforcement to contact Drey failed and his Instagram profile vanished.

These girls avoided becoming victims of human trafficking thanks to the efforts of a trained and concerned airline employee – thousands of others are not so lucky. No precise statistics exist, but a report in 2017 by the International Labour Organisation suggests that 24.9 million people are trafficked annually, the equivalent to the population of Australia. That's 50 people, mainly women and children, who become victims of human trafficking every single minute. It's also a transnational crime affecting almost every country, whether they be source, transit or destination, so it's likely that

many victims are transported by air. And it's getting worse - the US State Department classified trafficking as the fastest growing crime, as traffickers clamour to get a slice of this huge multi-billion dollar a year enterprise.

But what has this got to do with airlines? After all, it is governments and law enforcement that have the responsibility to identify, apprehend and prosecute the perpetrators of human trafficking, just as it is for other crimes. The bottom line is that airlines want to assist in tackling a crime that is hidden in plain sight. Unlike illegal wildlife trafficking, where cargo can be physically searched or scanned, human trafficking can be more difficult to detect. That's why law enforcement agencies are looking for customer-facing transportation staff, including airline personnel, to be trained in specific human trafficking awareness, so they can be an additional set of eyes and ears to help them with vital intelligence. Cabin crew are seen as particularly critical given that they spend more time with passengers than any other group, so are likely to be best placed to witness any suspected trafficking situations. That's why in the United States, the Customs and Border Protection, Department of Transportation and Department of Homeland Security developed the Blue Lightning Initiative (BLI). The BLI trains airline personnel to identify potential traffickers and human trafficking victims, and to report their suspicions to federal law enforcement. Over 70.000 personnel in the aviation industry have been trained through the BLI, and actionable tips continue to be reported to law enforcement.

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But there are many other reasons beyond the moral obligation why airlines have a natural interest in helping governments to prevent human trafficking.

Firstly, there is growing evidence that terrorist groups like ISIS are using human trafficking to fund their activities. A report by the Henry Jackson Foundation in 2017 estimated that ISIS derived between US \$10-30million (£7.3 to £21.8m) from slavery. A lot of these terrorist activities are directed toward civil aviation in the form of unlawful interference.

There are also significant legal and reputational risks related to this issue. More and more countries are implementing legislation aimed at tackling human trafficking that affects companies including airlines. In the United States, the Federal Aviation Authority (FAA) has already introduced airlinespecific regulations that requires carriers to train cabin crew on human trafficking awareness.

In other countries, airlines are affected by more general legislation, which requires companies to take actions to ensure their operations and those of their suppliers are free

from human trafficking. For example, in the United Kingdom, the Modern Slavery Act 2015 requires companies with over £36 million (approx. US \$49.5 million) turnover to provide an annual statement outlining the actions they have taken in this regard. Australia is planning similar legislation, while France has a more onerous law that has significant financial penalties for non-compliance. Other countries will follow suit.

Consumers and investors are also increasingly demanding that the businesses they purchase from and invest in demonstrate that they are good corporate citizens. Brands take years to build, but can be destroyed in minutes, so airlines need to ensure that they are mitigating the reputational risks associated with trafficking. Indeed, Future of the Airline Industry 2035, an analysis conducted by IATA and the School of International Futures (SOIF) in 2017 pointed to the fact that moving forward governments and consumers will look to airlines to have a positive influence in the world.

Many individual airlines have already anti-human launched trafficking initiatives, often as part of corporate social responsibility (CSR) or other activities. Indeed, in the US many carriers



had launched initiatives way before federal requirements for awareness training for cabin crew were in place. But until recently, there had been no industry-level campaign.

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Aware of the growing extent of the issue, IATA invited two speakers from the United Nations Office on Drugs and Crime (UNODC) and US broadcaster CNN to give a keynote address at its 73rd Annual General Meeting in They highlighted Cancun. respective Blue Heart and Freedom Project initiatives and recognised that some airlines were already involved in the fight against human trafficking. They urged others to join and noted that IATA was well placed to assist at the industry level. IATA's Director General and CEO, Alexandre de Juniac, promised that IATA would work through its governance process to determine a response at the industry level.



A lot has happened since then. More individual airlines have launched initiatives. For example, in February 2018 Aeromexico joined the UNODC Blue Heart campaign, while Malaysia Airlines unveiled a major anti-wildlife and human trafficking programme to its employees last November.

At the industry level, IATA received governance approval for the launch of a global initiative to ensure that all airlines, irrespective of size, are aware of the issue and have the tools and materials they need to get involved in anti-human trafficking initiatives.

There are three parts to IATA's work. Firstly, it has launched a general awareness campaign titled #Eyesopen aimed at airlines, their employees and the travelling public. This includes a video and posters, leaflets and other resources that can be used to raise the profile of the issues.

Once airlines are aware of the extent and humanitarian consequences of human trafficking they then need to know what specific actions they



take can make a difference. IATA is in the process of developing comprehensive quidance materials on policy development, training and best practice. This will supplement guidance being developed by the International Civil Aviation Organization (ICAO) which will be launched mid-2018.

Recognising potential cases of human trafficking is not a simple task, so it is essential that staff are trained to spot the signs, together with their professional experience. This will help avoid cases of misidentification of innocent passengers. Comprehensive training materials are being created by IATA with input from experts. This ranges complimentary e-learning training that airlines can implement quickly in to their existing security or cabin crew training, as well as more in-depth modules and classroombased training.

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There is also an advocacy element to IATA's work. It is no good for governments and law enforcement to ask for the help of airline staff that are trained in human trafficking awareness, if they do know to whom or where to report suspicions. Therefore, working through its worldwide country offices, IATA is researching the reporting protocols should air crew have suspicions of trafficking during a flight or if ground-based crew become concerned at a given airport. Whatever the protocol, IATA is clear that the anonymity of the person reporting the suspicions must be maintained both to encourage reporting and to protect them from dangerous transnational gangs that may be involved.

Of course, IATA recognises that while airlines are a critical part of the aviation supply chain there are

many opportunities to amplify the impact of the campaign with partners such as Airports Council International, and the Air Transport Action Group. Similarly, when it comes to technical expertise, IATA is also working with a wide range of organisations, including UNODC, Bali Process, and the UK Modern Slavery Leadership Training Group. In respect of the latter, we are jointly hosting an event on 18 April in Cardiff, Wales, focusing on aviation and hospitality's response to modern slavery, bringing together government, law enforcement, prosecutors, airlines, airports and other stakeholders.

IATA's campaign will be brought together by a proposed industry resolution that it intends to present at its 74th AGM in Sydney in June. The resolution denounces human trafficking and commits the airline industry to join the fight. This includes urging airlines to implement a policy on human trafficking and to train relevant staff in awareness and reporting.

IATA recognises that there is only so much that the aviation industry can do to help prevent trafficking. However, it is committed to mobilising the industry to join the fight. After all, as the case in Sacramento shows, the vigilance and professionalism of airline and aviation staff can save more people from becoming victims of this horrendous crime. In doing so, the aviation industry reinforces its message that it is indeed the business of freedom.



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and development as well as working with airline members, regional airline associations and others to articulate and advocate the industry positions to governments and regulators. He leads IATA's work on dealing with the issue of unruly passengers and on combatting human trafficking.