



HOUSING & HOMELESSNESS SYSTEMS

On-Ramps, Intersections, and Exit Routes:

A Roadmap for Systems and
Industries to Prevent and Disrupt
Human Trafficking

Polaris

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Introduction

Harold D’Souza hardly seemed like an obvious candidate for a five-figure bank loan. He had only just arrived from India, with a wife, two young boys, and a job offer that turned out to be fraudulent. Yet somehow, with just a few signatures on a few dotted lines, Harold walked out the door of a bank with what would have been a small fortune had he been allowed to access it. Of course, he wasn’t. Every dime of that money went to the man who actually arranged for the loan – the trafficker. This was the same man who brought Harold to the United States with the promise of a high-paying professional job and instead forced him to work in a restaurant and live in a virtual prison of debt and desperation. Exactly how the trafficker managed to secure a loan of tens of thousands of dollars in the name of a newly arrived migrant worker with no verifiable source of income remains a mystery to Harold. Clearly though, it was not dumb luck. The trafficker knew exactly how to work within and around a highly regulated and legitimate industry – banking – to maximize the profit he made on Harold and his family. It was all part of his business plan.

The man whose lies and manipulations robbed Harold of his freedom was not unique to his field. A successful trafficker, like any successful entrepreneur, begins with a business plan built on a platform of established business models and best practices. Over time, that plan is chiseled to perfection as the trafficker learns new skills and tests out innovative new ways to monetize the exploitation of human beings.

As with any enterprise, the business plan of a human trafficking venture is not built in a vacuum but rather exists within an ecosystem or matrix, depending on and intersecting with a range of legitimate industries and systems – cultural, governmental, environmental. Examples are abundant. Traffickers use banks to store their earnings and buses to move their victims around; hotel rooms are integral to the operations of some sex traffickers, social media is a vital recruitment trawling ground for others.

This report takes a magnifying glass to such private-sector intersections. The details matter. The more that is known

about the business plans of human trafficking, the more possible it becomes to prevent and disrupt the crime and help survivors find freedom. The insights here are gleaned from those in a position to understand the nuances of each business intersection point – the survivors who lived the experience. They are not definitive scientific conclusions but rather valuable baseline narratives that can spark further exploration and collaboration from other sectors.

Each set of insights is followed by detailed recommendations for turning them into action, industry by industry. Like the insights and information that precede them, these recommendations are also not intended to be definitive. They are a beginning; an invitation. What we have learned is only as valuable as the partners who join us in making the recommendations a reality – and by offering more of their own.

This report builds upon Polaris’s 2017 report, [The Typology of Modern Slavery](#), which analyzed data, gleaned from nearly 10 years of operating the National Human Trafficking Hotline, to show that human trafficking in the United States consists of 25 distinct business models. For each, the Typology report illuminated the basic operational plan - the demographics of both victims and traffickers, and how victims are recruited and controlled.

This report focuses on the private and public-private sector because fighting human trafficking will require participation by business and industry partners with resources at a comparable scale.

The sectors explored in this report – **the financial services industry, social media, transportation industry, hotels & motels, housing & homelessness systems, and health care** – are not the only private businesses that intersect with human trafficking. Nor are they “to

blame” in some way for human trafficking. Indeed, as you will read, many stakeholders in each of these systems and industries are already doing innovative work or making powerful commitments to becoming part of the solution.

Clearly, engagement from the private sector alone is not enough. Child welfare agencies, schools and teachers, the criminal justice system, and local, state, and federal government actors are the proverbial tip of the spear, essential to the fight against human trafficking.

But human trafficking is a \$150 billion global industry that robs 25 million people around the world of their freedom. This report focuses on the private and public-private sector because fighting human trafficking will require participation by business and industry partners with resources at a comparable scale to the size of the problem. Participation, in this context, is not a euphemism for making donations to groups that fight human trafficking. The fight against human trafficking requires not just passive support but actual, active commitment and effort on the part of businesses that unwittingly, but regularly intersect with traffickers, victims, and survivors.

The information about how each of these systems and industries are exploited by traffickers as part of their business plans comes from extensive surveys of, and focus groups with, survivors of all types of human trafficking, as well as from the National Human Trafficking Hotline. Those who participated in this work, and in the sometimes painful process of sharing their own stories, did so not to point fingers, but rather to point out opportunities. We are grateful beyond measure to those with the strength to voluntarily speak their truth, again and again, in hopes of keeping others from suffering.

They did so because they know it is possible. Tanya Street lived it. As a recent high-school graduate, Tanya was vulnerable to the machinations of a pimp who showered her with love and attention, then turned her out on the street programmed to believe she was worthless, invisible, unlovable, without him. Most of the doctors at her local health care clinic simply reinforced his brainwashing. Repeatedly, she showed up with urinary tract infections that had her literally doubled over in pain. She felt frowned upon, disapproved of. No

one in the emergency room asked her why this kept happening, if maybe she would like some help beyond antibiotics. She wonders what would have happened if just once during those visits, someone had asked her the right question, or offered her information about getting help or getting out. She wonders how much sooner she would have found her voice, started her life. She wonders what pain she might have avoided.

Harold too knows that if someone at that bank, long ago, had done something a little differently, perhaps everything else would have been different and his family could have avoided some of the pain, fear, and trauma they live with to this day.

If human trafficking is a business, requiring intense planning and depending on other businesses and partners to flourish, so too must the fight against trafficking be a collective undertaking.

Today, Harold and Tanya have been honorably appointed to the United States Advisory Council on Human Trafficking. They share their experiences because they believe others truly can learn from them, and systemic change can be achieved. But they cannot be everywhere, talking to everyone, in every hospital emergency room, bus terminal, at every hotel front desk, truck stop parking lot, or monitoring the millions of social media conversations that fly through the ether at any given time. What Harold, Tanya, and all the survivors who contributed to this project have done is recognize the value of mapping the intersections where human trafficking meets legitimate businesses and systems. In doing so, they have staked out new territory, recognizing that if human trafficking is a business, requiring intense planning and depending on other businesses and partners to flourish, so too must the fight against trafficking be a collective undertaking that is painstakingly plotted and thoughtfully implemented, in partnership with the businesses that unwittingly make it possible.

The Typology of Modern Slavery

A Summary

In March 2017, Polaris released the ground-breaking report, [The Typology of Modern Slavery](#), which classified the 25 distinct types of human trafficking business models occurring in the United States. The following information includes a short description or definition of each type of trafficking as well as updated statistics on cases and potential victims learned about from the National Human Trafficking Hotline through December 31, 2017. The cases below are based off of analysis of 40,000+ cases of potential human trafficking and 11,000+ cases of potential labor exploitation. The following cases only represent the cases that occurred in the United States and where the type of trafficking or labor exploitation was known. This is not a comprehensive report on the scale or scope of human trafficking within the United States. These statistics may be subject to change. Please see the Typology report and the methodology section of this report for further context.

Type	Definition	DEC. 2007 - DEC. 2017	JAN. 2015 - DEC. 2017
		Number of Cases	Number of Potential Victims
Agriculture & Animal Husbandry (Type: Labor Trafficking)	A farming business in which potential victims are exploited for their labor in growing/maintaining crops, cultivating soil, or rearing animals.	556 (HT)	609 (HT)
		1,761 (LE)	844 (LE)
Arts, Sports, & Entertainment (Type: Labor Trafficking)	Potential victims are exploited for their labor in amateur, scholastic, or professional athletics, modeling, or performing arts (including adults in exotic dancing).	135 (HT)	102 (HT)
		40 (LE)	10 (LE)
Bars, Strip Clubs, & Cantinas (Type: Sex & Labor Trafficking)	This category comprises establishments that front as legitimate bars and clubs, selling alcohol while exploiting victims for sex and labor behind the scenes.	992 (HT)	601 (HT)
Carnivals (Type: Labor Trafficking)	Potential victims are exploited for their labor in operating rides, games, and food stands.	59 (HT)	28 (HT)
		80 (LE)	27 (LE)
Commercial Cleaning Services (Type: Labor Trafficking)	Potential victims are exploited for their labor in janitorial/cleaning services performed in private households, office buildings, and other commercial/public properties.	128 (HT)	101 (HT)
		362 (LE)	79 (LE)
Construction (Type: Labor Trafficking)	Potential victims are exploited for their labor in carpentry, masonry, painting, roofing, etc.	202 (HT)	157 (HT)
		458 (LE)	183 (LE)
Domestic Work (Type: Labor Trafficking)	An industry where an individual works for one specific household/family providing personal household tasks, cleaning, child care, or adult caretaking, often living on-site with the family.	1,437 (HT)	753 (HT)
		487 (LE)	202 (LE)
Escort Services (Type: Sex Trafficking)	Commercial sex acts that primarily occur at temporary indoor locations. Includes: hotel-based operations, internet ads, and out-calls to buyers.	6,418 (HT)	4,555 (HT)
Factories & Manufacturing (Type: Labor Trafficking)	Potential victims are exploited for their labor in food processing, clothing/shoe manufacturing, factories producing electronic devices, vehicles, and more.	99 (HT)	77 (HT)
		222 (LE)	54 (LE)
Forestry & Logging (Type: Labor Trafficking)	Potential victims are exploited for their labor as tree farm workers, reforestation planters, loggers, and workers maintaining woodland areas.	57 (HT)	27 (HT)
		173 (LE)	77 (LE)

HT = Human Trafficking | LE = Labor Exploitation¹

Type	Definition	Number of Cases	Number of Potential Victims
Health & Beauty Services (Type: Labor Trafficking)	Potential victims are exploited for their labor in businesses such as nail salons, hair salons, acupuncture businesses, etc.	345 (HT)	122 (HT)
		140 (LE)	46 (LE)
Health Care (Type: Labor Trafficking)	Potential victims are primarily exploited for their labor in residential nursing homes, occupational health facilities, or as home health aides.	64 (HT)	53 (HT)
		70 (LE)	29 (LE)
Hospitality (Type: Labor Trafficking)	Potential victims are exploited for their labor as hotel housekeepers, front desk attendants, bell staff, etc.	151 (HT)	133 (HT)
		585 (LE)	349 (LE)
Illicit Activities (Type: Sex & Labor Trafficking)	A potential victim is forced to provide labor or services to contribute to an illegal/illicit business operation such as drug selling, drug smuggling, drug production, financial scams, gang activity, etc. Potential victims are also often forced into commercial sex acts in addition to this labor.	297 (HT)	294 (HT)
Illicit Massage Businesses (Type: Sex & Labor Trafficking)	Primary business of sex and labor trafficking is concealed under the façade of legitimate spa services.	3,736 (HT)	1,253 (HT)
Landscaping (Type: Labor Trafficking)	Potential victims are exploited for their labor in gardening, maintaining public or private grounds, or within nurseries.	147 (HT)	112 (HT)
		749 (LE)	250 (LE)
Outdoor Solicitation (Type: Sex Trafficking)	Potential victims are forced to find commercial sex buyers in outdoor locations such as on "tracks"/"strolls," or at truck stops.	1,983 (HT)	1,150 (HT)
Peddling & Begging (Type: Labor Trafficking)	Potential victims are expected to beg for "donations," or sell small items such as candy, at a stationary, often outdoor locations.	602 (HT)	327 (HT)
		61 (LE)	28 (LE)
Personal Sexual Servitude (Type: Sex Trafficking)	A potential victim is forced to provide sex acts to one/specific person(s) (oftentimes in a chronic and ongoing situation) in exchange for something of value. The controller and the "buyer" are usually the same person. (See also: Survival Sex , in the Glossary)	587 (HT)	362 (HT)
Pornography (Type: Sex Trafficking)	Pre-recorded sexually explicit videos & images, including child pornography. This can include informally distributed pornographic material, or commercial sex through a formal pornography company. •Note: This type should not be confused with interactive webcam shows. (See Remote Interactive Sexual Acts)	1,107 (HT)	516 (HT)
Recreational Facilities (Type: Labor Trafficking)	Potential victims are exploited for their labor in amusement/theme parks, summer camps, golf courses, and community swimming pools.	44 (HT)	33 (HT)
		265 (LE)	92 (LE)
Remote Interactive Sexual Acts (Type: Sex Trafficking)	Live-streamed, interactive, simulated sex acts/shows. •Note: This type should not be confused with pre-recorded sexually explicit videos & images. (See Pornography)	146 (HT)	119 (HT)
Residential Sex Trafficking (Type: Sex Trafficking)	In-call commercial sex occurring at a non-commercial residential location.	1,800 (HT)	1,665 (HT)
Restaurants & Food Services (Type: Labor Trafficking)	Potential victims are exploited for their labor as servers, bussers, dishwashers, cooks, etc.	595 (HT)	274 (HT)
		1,340 (LE)	392 (LE)
Traveling Sales Crews (Type: Labor Trafficking)	Potential victims travel in groups to various cities/states selling items such as magazines door-to-door.	686 (HT)	356 (HT)
		96 (LE)	40 (LE)

HT = Human Trafficking | LE = Labor Exploitation¹

Systemic Change Matrix

A strategic approach to ending human trafficking includes understanding the ways each of these systems enables or intersects with potential traffickers or victims. This matrix depicts the 25 types of human trafficking in the United States, cross-referenced with eight highlighted systems and industries, six of which are discussed in-depth in this report. Each system and industry can be activated to help disrupt and prevent the crime in unique and impactful ways.

	 Financial Services Industry	 Hotels & Motels	 Housing & Homelessness Systems	 Social Media	 Temporary Work Visas	 Transportation	 Business Regulatory Systems	 Health Care
Escort Services	●	●	●	●		●		●
Illicit Massage Businesses	●		●	●	●	●	●	
Outdoor Solicitation		●	●	●		●		●
Residential Sex Trafficking	●		●			●		●
Domestic Work	●		●	●	●	●		●
Bars, Strip Clubs, & Cantinas	●	●	●	●		●	●	●
Pornography	●			●		●	●	●
Traveling Sales Crews	●	●	●	●		●	●	●
Restaurants & Food Service	●		●	●	●	●	●	●
Peddling & Begging			●					
Agriculture & Animal Husbandry	●			●	●	●	●	●
Personal Sexual Servitude			●	●				●
Health & Beauty Services	●		●		●	●	●	●
Construction	●		●		●		●	●
Hospitality	●	●			●		●	
Landscaping	●				●	●	●	●
Illicit Activities	●		●			●		●
Arts, Sports & Entertainment	●			●	●	●	●	●
Commercial Cleaning Services	●	●	●		●		●	
Factories & Manufacturing	●		●		●		●	●
Remote Interactive Sexual Acts	●		●	●				
Carnivals	●				●	●	●	●
Forestry & Logging	●				●	●	●	●
Health Care	●		●		●		●	●
Recreational Facilities	●	●			●		●	

Methodology

Hotline Data

This report includes data from the U.S. National Human Trafficking Hotline. The National Hotline is not a research-oriented program. Instead, the Polaris staff who operate the hotline are focused on helping potential victims of trafficking access critical support and services to get help and stay safe. While advocates use detailed protocols to assess for indicators of human trafficking, they adapt their phrasing and scope of questions in response to each individual's answers and the circumstances of the call, text message, or chat signal. Beyond this trafficking assessment, potential victims and third parties reporting these situations are not asked a set of standardized questions and only provide information that they feel comfortable sharing with Polaris's staff to get the help they need. Additionally, asking certain questions during some signals may not be appropriate or possible due to the context of the call. For example, when Hotline staff receive calls from potential victims in crisis situations with limited time to reach out for help, staff focus on the caller's safety and assisting with urgent needs such as emergency shelter or law enforcement assistance, and not on detailed information about the victim's trafficking experience.

As such, the data points in this report represent only what those contacting the National Hotline chose to disclose. The number of survivors or potential human trafficking cases with a particular attribute would likely have been significantly higher if Polaris staff had systematically asked a standardized set of questions to each individual contacting the Hotline.

Since awareness of both human trafficking and the existence of a national victim service hotline is still limited, this data set should be interpreted as a limited sample of actual victim or trafficking case data, rather than a representation of all existent victims or cases of human trafficking. The information reported by the National Hotline is only able to represent who has access to and knowledge of the Hotline, who has the means to reach out, and who is more likely to self-identify as a potential victim or some-

one in need of assistance. The data reported by Polaris should not be compared to the findings of more rigorous academic studies or prevalence estimates.

A Note about Language:

Polaris recognizes that survivors of human trafficking identify in many ways which can be deeply personal to the individual. Throughout this report, we tend to use the terms 'victim' and 'survivor' fairly interchangeably.

Polaris staff operating the National Human Trafficking Hotline do not investigate reports made by individuals contacting the Hotline and cannot verify the accuracy of the information reported. Therefore, this report uses the term "potential victim" when referring to those individuals learned about on the Hotline, who, through a Hotline trafficking assessment, meet the definition of an individual who has experienced sex or labor trafficking.

This report references data from the National Hotline using two distinct timeframes. The data referencing **cases** is for the timeframe of December 7, 2007 - December 31, 2017. The data referencing **unique potential victim profiles** is for the timeframe of January 1, 2015 - December 31, 2017. Polaris did not begin logging victim profiles until January 1, 2015. Therefore, historic data from before January 1, 2015, is not yet available.

Cases of Potential Human Trafficking

(December 7, 2007 - December 31, 2017)

Polaris began operating and collecting data on potential cases of human trafficking and labor exploitation from the National Human Trafficking Hotline as of December 7, 2007. Polaris defines a “case” of human trafficking² as an individual situation of trafficking which could include one or multiple potential victims. Data on the case level includes, but is not limited to, form of trafficking (e.g. sex vs. labor), the type of trafficking (as defined in the Typology of Modern Slavery³), venue location, or geographic location of trafficking, etc. These are the data points that will have the timeframe of December 7, 2007 - December 31, 2017.

Individual Potential Victim Profiles

(January 1, 2015 - December 31, 2017)

On January 1, 2015, Polaris began logging individual potential victim profiles, for each unique potential victim learned about through trafficking and labor exploitation related-signals to the National Hotline. Data on an individual potential victim profile can include, but is not limited to, demographic information such as current age, adult/minor status, gender, type of work visa (if applicable), and country of origin. These records can also include detailed information on the potential victim’s experience during the potential trafficking or exploitation such as age at entry, methods of abuse endured, recruitment tactics used, recruitment location, relationship of victim to controller(s) and recruiter(s), risk factors/vulnerabilities present before the trafficking situation, and more. Polaris did not have direct contact with all victims represented in this data set. Third parties reporting information about a victim often did not have information about some details of the situation they were reporting. Each case of human trafficking or labor exploitation could identify multiple unique poten-

tial victims, or the signalers may not have had enough information to identify any individual potential victims in the situation.⁴ These are the data points that will have the timeframe of January 1, 2015 - December 31, 2017.

Polaris Survivor Survey

During the time period of **August 22, 2017 - September 18, 2017**, Polaris sought human trafficking survivor participants for a paid online survey entitled “*Trafficking Survivor Experiences with Systems & Industries*.” The survey, available in both English and Spanish, was nationally distributed to over two dozen non-governmental organizations (NGOs) which either directly serve victims and survivors of human trafficking, or organize survivor leadership. Although some of the individual NGOs which Polaris worked with to distribute the survey may specialize or exclusively interface with survivors of specific demographics or types of trafficking (e.g. some organizations only serve sex trafficking survivors, some organizations mainly serve foreign nationals, etc.), the survey was sent to a diverse range of NGOs representing many geographies, survivor demographics, and types of trafficking.

The survey was open to any adult who self-identified as a victim or survivor of sex or labor trafficking. Survey participants were not asked for any kind of confirmation of victim status. The completion of the survey was also completely voluntary, and survivors were compensated for their time. Therefore, the survey was not anonymous. Polaris collected personal contact information in order to send payment.

The survey resulted in **127 individual survivor respondents**.

For all 127 survey participants, basic demographics and information on what type of human trafficking they experienced was collected. See Figures 1.0 - 1.5

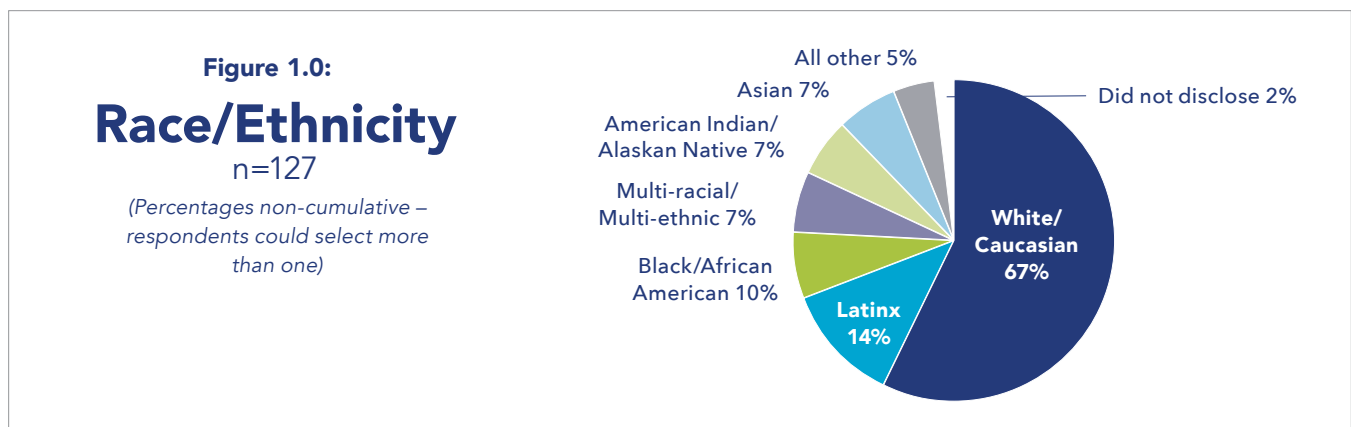


Figure 1.1:
Gender
n=127

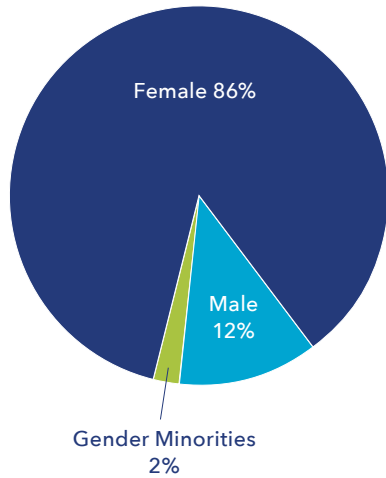


Figure 1.2:
Age at trafficking entry
n=127

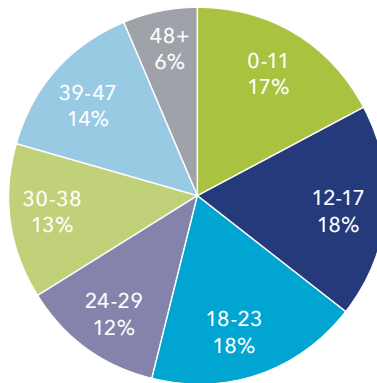


Figure 1.3:
Immigration Status
n=126*
**One respondent did not answer.*

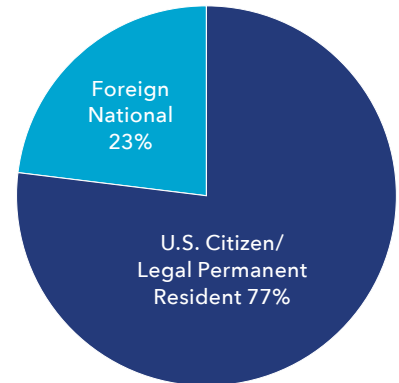
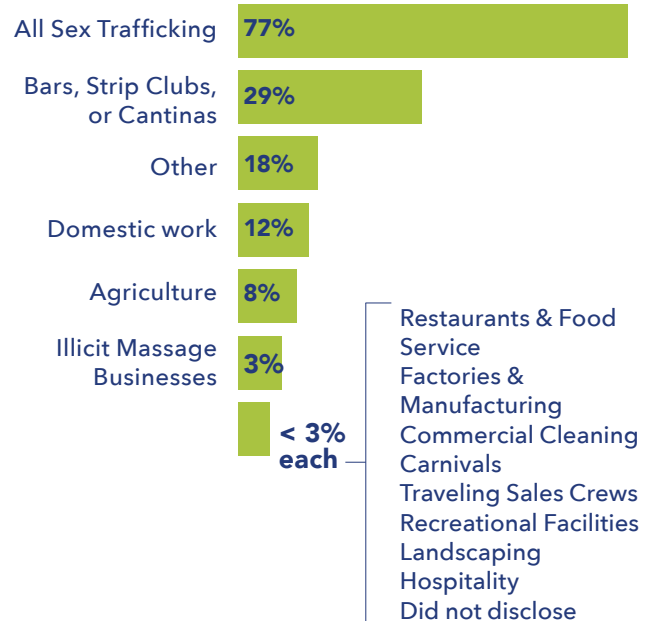


Figure 1.4:
Types of Trafficking
n=127

All Sex Trafficking	77% (98)
Bars, Strip Clubs, & Cantinas	29% (37)
Other	18% (23)
Domestic Work	12% (15)
Agriculture & Animal Husbandry	8% (10)
Illicit Massage Businesses	3% (4)
Restaurants & Food Service	< 3% ⁵
Commercial Cleaning	< 3%
Factories & Manufacturing	< 3%
Carnivals	< 3%
Hospitality	< 3%
Landscaping	< 3%
Traveling Sales Crews	< 3%
Recreational Facilities	< 3%
Not Specified	< 3%

Figure 1.5:
Types of Trafficking
n=127



Data is non-cumulative. Survey participants could select multiple options.

After the demographic questions, the survey walked respondents through separate sections dedicated to the systems and industries addressed in this report: the financial services industry, social media, transportation, hotels & motels, housing & homelessness systems, and health care.⁶

Each of these sections began with a “screening question” asked of all respondents to assess whether or not they, (or their traffickers in some cases) had any inter-

action or access to the system/industry pertaining to that section. Each screening question also provided some necessary definitions, common examples, and/or framing context to clarify the intent of each section. If respondents answered “Yes” or “Not Sure,” the survey advanced them to that section’s set of survey questions. If respondents answered “No,” the survey skipped that section altogether and navigated them to the next system/industry’s screening question. An example screening question is below:

Example Screening Question:

Trafficking Survivor Experiences with Systems & Industries

Hotels & Motels

Did you ever come into contact with any hotels or motels during your exploitation? This includes but is not limited to staying nights, living there, working/being trafficked as a hotel employee or contractor, contracting with a hotel, being forced to engage in commercial sex at hotels/motels, etc. *

Yes

No

Not sure

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Figure 1.6: Survey Sections

Therefore, each individual section pertaining to each system/industry has a different total responding sample, depending on how many of the 127 total survey respondents answered “Yes” or “Not Sure” to that section’s screening question. Figure 1.6 breaks down the total number of respondents that “screened in” to each system/industry section along with the percentage of total survey respondents:

Survey section	Total # of survivors that “screened in” to section	% of total survey respondents
Financial Services Industry	99	78%
Transportation	104	82%
Social Media	73	57%
Hotels & Motels	100	79%
Health Care	88	69%
Housing & Homelessness Systems	50	39%

Survey Limitations

The survey and focus groups were not required to, nor did they undergo, a formal institutional review board (IRB) approval process. Despite the project not formally going through this process, Polaris conducted appropriate due-diligence measures to ensure that every step of the research project, including the development of the survey questions, analysis of the participants' benefits and risks, informed consent/voluntary participation procedures, data collection and security standards, compensation norms, and other participant safeguards, were survivor informed, trauma-sensitive, and thoughtfully approached to protect the research participants.

This survey was not the result of a random sample. A central limitation to diverse sampling was the finite network to which Polaris was able to distribute the survey. Although Polaris works with a wide variety of anti-trafficking NGOs throughout the United States, and every effort was made to diversify the types of NGOs to whom the survey was distributed, distribution was limited to Polaris's partners and contacts. Moreover, the distribution of the survey was at the discretion of the NGOs, and therefore, the final sample population was entirely dependent on each NGO's willingness and ability to distribute the survey to the populations it had contact with.

The survey was facilitated through accredited organizations whose networks are also finite and limited to their scope. This naturally caused a response bias leaning toward survivors of human trafficking who were already removed from their trafficking situation and receiving services or engaging in survivor leadership. As the survey did not ask about the years during which the respondent was trafficked, it is impossible to determine how long respondents were removed from their trafficking situation. Therefore, social, cultural, or environmental changes may impact the current significance of some of these results. For example, some survivor respondents may have experienced trafficking during a time which pre-dates the general availability or pervasive use of social media.

Results of the survey also lean disproportionately to sex trafficking survivors (77 percent). This indicates that NGOs with a focus on sex trafficking were either more willing or able to widely distribute the survey to the populations they serve, or the anti-sex traf-

ficking NGOs had a much more expansive network of interested survivors. Relatedly, some NGOs which serve large populations of labor trafficking survivors indicated that unforeseen environmental and political events, which coincided with the open period for survey submissions, impeded their ability to distribute the survey to their networks. The need for these providers and their networks to focus on more urgent matters likely impacted the number of labor trafficking survivors who had access to the survey.

There were other design limitations which likely impacted the response rate and response content of the survey results. First, the limited languages in which the survey was distributed likely prevented survivors of certain types of trafficking from participating in the survey. Due to resource limitations, Polaris was unable to distribute the survey in other languages but would ideally have expanded the language services if possible. Second, the online platform of the survey likely excluded some individuals who did not have the resources available to access the internet or to do so in private locations. Third, the survey's lack of anonymity may have deterred people who would have otherwise chosen to take the survey but remain anonymous.

Finally, neither the Polaris survivor survey, nor the follow up Polaris focus groups should be compared to the findings of more rigorous academic studies or prevalence estimates.

Polaris Focus Groups

For Phase II of the research project, researchers sought to dive deeper into select areas of the survivor survey to gather personal narratives and survivor recommendations for systems and industries to enhance the report. To do this, five focus groups were assembled from the pool of survey respondents. Due to the extensive number of respondents who were sex trafficking survivors, four groups consisted of sex trafficking survivors and one group consisted of labor trafficking survivors.

The focus groups primarily sought to supplement the data Polaris already had access to from the National Human Trafficking Hotline. Therefore, the selection of focus group participants was strategic to ensure researchers were able to collect the specific type of information needed to gain necessary insights for each system/industry.

First, researchers identified the specific systems/industries where deeper information was needed:

Sex trafficking Groups:

- 1) Financial Services Industry
- 2) Social Media
- 3) Transportation
- 4) Hotels & Motels
- 5) Health Care

Labor Trafficking Groups:

- 1) Financial Services Industry
- 2) Transportation
- 3) Health Care⁷

Second, researchers then identified individual respondents whose survey answers indicated that they had significant interactions with or knowledge of these specific industries during their exploitation. Every survey response was reviewed individually, and each section of the survey (finance, transportation, etc.) was ranked on a scale of 0-2 in terms of how significant the respondent's interaction with that system/industry was:

- 0= Very little/no interaction or knowledge
- 1= Moderate interaction or knowledge
- 2= Significant interaction or knowledge

To determine this significance, researchers weighed some questions in the survey stronger than others, based on the specific research needs. For example, researchers prioritized a survivor's understanding of

how the finances were managed in his or her situation, as this information is not often revealed during regular Hotline interactions.

Based on their answers, 26 survey respondents were invited to attend one of five focus groups hosted in various cities across the country.

- Los Angeles, CA - 5 participants
- Denver, CO - 5 participants
- Dallas, TX - 4 participants
- Atlanta, GA - 5 participants
- Washington, DC - 5 participants

Due to unforeseen and extenuating circumstances, two participants intended for the focus groups could not attend, and therefore provided their input through remote one-on-one interviews with researchers.

Each focus group was two hours long and covered as many prioritized systems/industries as time would allow. Of course, due to the natural flow of discussion of focus groups, not every group addressed every question or every system or industry.

Each focus group or interview was transcribed and analyzed using basic content analysis to identify common themes across groups. These themes, in combination with the quantitative survey data, and findings from the National Hotline, informed the general structure and content of this report.



Housing & Homelessness Systems

Strengthening a victim's access to safe and affordable housing would dramatically eliminate a tremendous swath of vulnerable people from the pool that traffickers have to choose from. Ensuring someone has a safe place to call home allows them the physical and emotional space to thrive. Yet to date, the majority of discussions around housing and human trafficking centers on the lack of safe, short-term shelter beds. This is a real and ongoing problem. There are not enough shelter beds for a diverse range of people to meet the need either for survivors who are trying to rebuild their lives, or for vulnerable people who are at risk for being trafficked in the first place. But emergency shelter is only part of the picture. Stakeholders across the housing system – landlords, property managers, rental management companies, vacation rentals, developers, government agencies – all have a role to play in preventing and disrupting trafficking.

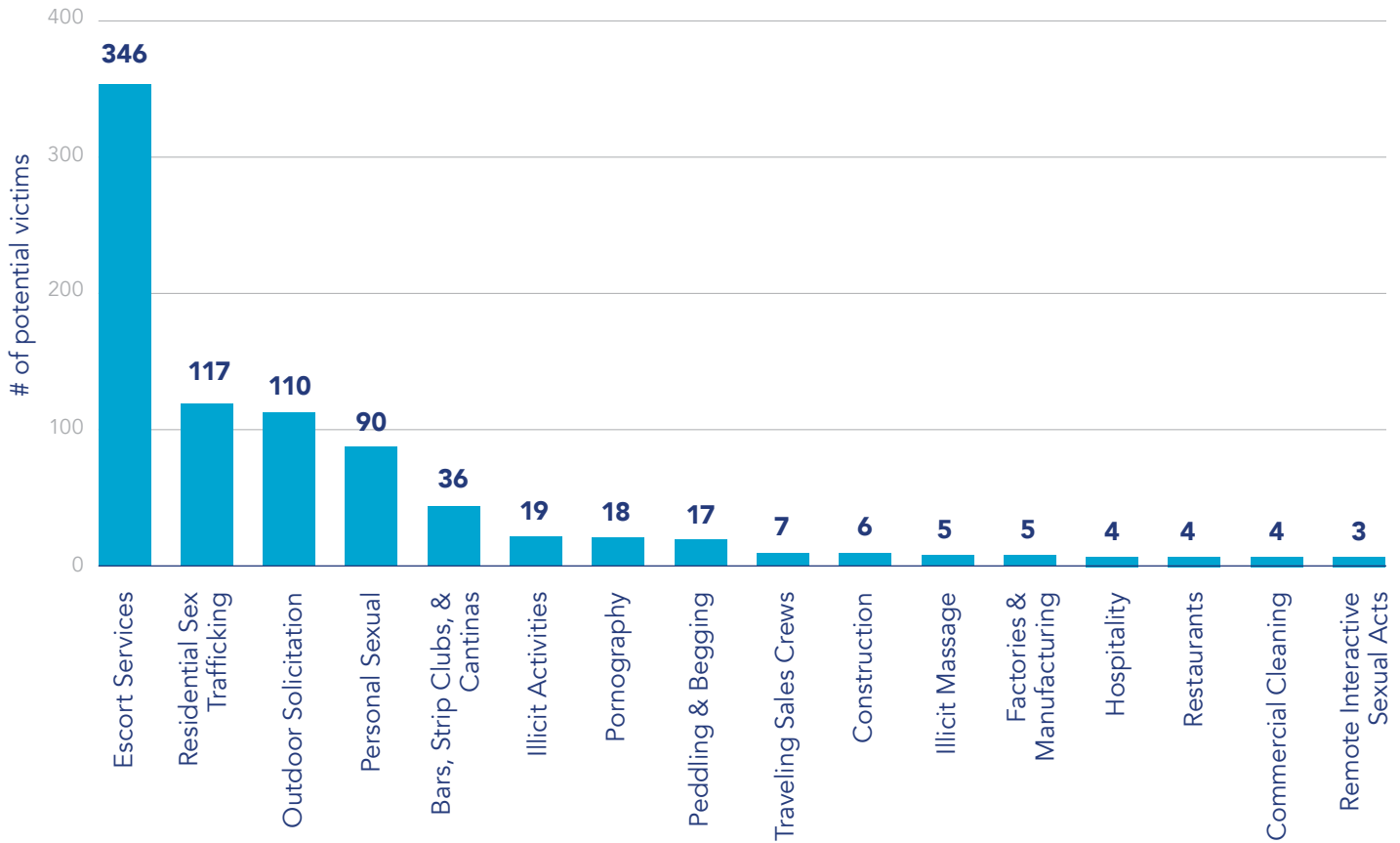
How Housing & Homelessness Systems may be Used in Recruitment

In Polaris's survivor survey, 64 percent of survivor respondents reported being homeless or experiencing unstable housing when they were recruited into their situation. Similarly, from January 2015 - December 2017, **the National Human Trafficking Hotline learned of 1,548 potential victims of human trafficking who were reported to be experiencing the same unstable housing circumstances at the start of their trafficking situation.** Potential victims experiencing homelessness have been forced into many different types of trafficking, including but not limited to, escort services, residence-based commercial sex, illicit activities, begging and peddling, and outdoor solicitation. Figure 7.0 breaks down the data.

Traffickers exploit potential victims' fear of sleeping on the street, first by offering safe shelter as a coercive recruitment tactic then, as the situation progresses, by threatening to make them homeless as a means of control.

64% of survivor respondents to Polaris's survey reported being homeless or experiencing unstable housing at the time they were recruited into their trafficking situation.

Figure 7.0:
Types of Trafficking Affecting Potential Victims Experiencing Homelessness
 National Human Trafficking Hotline: January 1, 2015 - December 31, 2017 (n=1,548)



Human trafficking in runaway and homeless youth (RHY) populations has been widely documented across the anti-trafficking and related fields. The 2017 study, *Labor and Sex Trafficking Among Homeless Youth* by Laura T. Murphy, interviewed 641 RHYs being served by Covenant House in the United States and Canada, and found that nearly 1 in 5 youth (or 19 percent) had been a victim of human trafficking. They had been victims of sex trafficking (14 percent), labor trafficking (8 percent), and of both sex and labor (3 percent).¹⁴⁸ However, this study was not limited to individuals who were homeless before their trafficking situation, as some survivors in the study reported being trafficked by their parents during their early childhood that pre-dated their homelessness.

Homelessness, Sex Trafficking, and Survival Sex

In the Murphy study, of the youth who reported being trafficked for sex, engaging in survival sex, or generally trading sex for money, 68 percent reported doing so while they were homeless.¹⁴⁹ This trend can also be seen in the National Hotline data set since escort services, residence-based commercial sex, and outdoor solicitation are the top three types of trafficking affecting all individuals experiencing homelessness.

Survival sex is when an individual engages in sexual activity in exchange for basic living necessities such as food and housing. This arrangement could be voluntary (with adults 18+), exploitative, or rise to the level of sex trafficking, depending on the conditions. In the Murphy study, 19 percent of all youth interviewed reported engaging in survival sex.¹⁵⁰ When the exploiter implements elements of force and coercion in survival sex situations, such as coercing the victim with drugs or threatening to make them homeless if they don't comply, the National Hotline considers this experience part of the personal sexual servitude trafficking business model. Recruitment of homeless individuals in this type of trafficking also tends to involve the exploiter misrepresenting a living arrangement or intimate relationship with the potential victim.

Despite only about 6 percent of potential victims with unstable housing being forced into survival sex situations since January 2015, according to National Hotline data, Polaris believes this is likely an extremely underreported type of trafficking in this data set. Self-identification is a barrier in any trafficking case but likely even more so with individuals who are trading sex for basic needs. Most often, these individuals don't see themselves as victims, or even what they are doing as commercial sex, but simply as doing what they need to in order to survive. This can even be the case if elements of trafficking are present.

Runaway and homeless youth can also enter into "sugar baby" relationships with much older partners (a.k.a. "Sugar daddies" or "sugar mamas") in exchange for gifts, funds, or necessities. The 2017 Murphy study found that 20 percent of the youth who had engaged in the sex trade had been involved with an older "sugar daddy" or

LGBTQ+ Homeless Youth

Already struggling with fewer resources, employment opportunities, or social supports, as well as increased rates of discrimination at the hands of their families and peers, LGBTQ+ homeless youth are 3-7 times more likely to enter the street economy and engage in survival sex to meet basic needs over their non-LGBTQ+ homeless peers.¹⁵¹ According to a study released in 2015 by the Urban Institute, 46 percent of LGBTQ+ youth trading sex for survival in New York City, first became introduced to the idea of the sex trade by friends who were already in the life.¹⁵²

Despite some misconceptions that LGBTQ+ individuals are more likely to perpetrate sexual violence rather than be victims of it, LGBTQ+ homeless youth are 7.4 times more likely to experience acts of sexual violence than their non-LGBTQ+ peers.¹⁵³ The National Hotline often hears of potential traffickers exploiting an LGBTQ+ person's housing insecurity and need for family, threatening to "out" them to loved ones, manipulating their self-worth, causing distrust of others, and withholding hormone therapy or other gender-affirming necessities in order to control them. However, it's crucial to acknowledge that, despite the presence of additional barriers and vulnerabilities that traffickers can exploit, this population possesses a sense of agency and strength that enables individuals to face adversity and stay safe. In order to successfully support this population, service providers, law enforcement, and other stakeholders must harness that resiliency by equipping LGBTQ+ communities with the tools to protect themselves and their peers from those who seek to exploit them, while also ensuring that comprehensive and inclusive resources are available when needed.

For more information on how LGBTQ+ youth can prevent human trafficking from occurring within their communities, please see Polaris's 2016 report [Staying Safe: Tips for LGBTQ Youth](#).

“sugar mama” for at least one of their reported sex trade experiences.¹⁵⁴ While not all of these relationships are exploitative, the National Hotline has seen cases where the exploiter begins controlling the victim’s movements or social relationships, becomes physically or sexually violent, and can withhold the promised financial assistance or shelter until sex is exchanged.

Homelessness and Labor Trafficking

The vast majority of studies involving RHYs focuses on their high rates of sex trafficking, survival sex, or general involvement in the commercial sex industry. What is unique about the Murphy study is that it illuminated the experience of labor trafficking among this population, finding that 8 percent of the 641 interviewed youth were trafficked for labor at some point in their lives. The vast majority (81 percent) of these youth were forced to sell drugs. Many participants in the Murphy study explained that the drug trade was normalized early in life while their families were desperate to make ends meet. While some RHYs reported being coerced as children to run drugs for their family’s drug trade businesses, others described having been threatened by drug dealers, or violent gang-related traffickers.¹⁵⁵ The National Hotline sees this trend as well, mostly with homeless young women who are forced to sell drugs in combination with selling commercial sex.

Sex Trafficking Recruitment at Shelters

Sex trafficking recruitment has been documented by the National Hotline at homeless shelters, domestic violence shelters, RHY shelters, group homes, and through other shelter programs. From January 1, 2015 - December 31, 2017, the National Hotline identified 1,233 potential victims of sex trafficking where the type of location of their recruitment was known.

Nearly 15 percent of these victims were recruited directly from shelter programs or group homes.

This is possible in part because many such shelters do not have confidential addresses in order to ensure that the homeless community can know where to receive services in any given city. However, this also means traffickers know exactly where these shelters and their vulnerable residents are and can monitor the premises and approach prospective victims as they come and

go. Offers of more comfortable or private living conditions, free food or illicit substances, and intimate relationships are often used to coerce potential victims to initially engage with traffickers.

According to National Hotline data, potential traffickers typically avoid directly recruiting from shelters and instead opt to send other potential victims into these spaces to recruit on their behalf. In fact, the most frequently reported type of recruiter for National Hotline victims lured from shelters or group homes was another potential victim. At the behest of their traffickers, these potential victims befriend others in the shelter and utilize tactics like manipulation of the friendship, assurances of a happier life once out of the shelter, or false promises of financial gain. In some cases recruiters will promise the potential victim that their boyfriend or “pimp” will financially provide for them, in other cases the potential victim is unaware that a third-party trafficker exists at all.

Potential victims may also attempt to leave their trafficker multiple times and seek shelter while doing so. However, because of the intensive manipulation, trauma-bonding, and lack of gainful economic opportunities available to them, they may end up leaving the shelter to return to their trafficker. Occasionally, these victims may bring other women from the shelter back with them, sometimes hoping to regain the approval and forgiveness of their potential trafficker.

Case Study: Jasmine's Story

A runaway homeless youth shelter seemed like the safest option for Jasmine* when she needed to get away from her abusive step-mom. Jasmine entered the shelter when she was 18 and immediately befriended Tasha*, who was only slightly older, and claimed to have a similar background. Tasha invited Jasmine to church, defended her in arguments, and bonded with her over their shared adversity. After about a month, Tasha moved out of the shelter and asked Jasmine to come with her. Tasha told Jasmine that she could make some money by going on dates with older men and would eventually be able to support herself. Jasmine did not anticipate providing commercial sex on these "dates" and was excited by the possibility of being independent.

Jasmine moved out of the shelter with Tasha a few short weeks later. After only three nights at Tasha's apartment, Tasha told Jasmine that she needed to start making money if they were going to live together, otherwise she would end up hungry and homeless all over again. Tasha brought Jasmine to a hotel that night and told her that she was going to have sex with men who would be arriving throughout the evening. Tasha took all of the money made and also began forcing Jasmine to dance and have commercial sex at a nearby strip club. Jasmine was made to sleep on the floor of their apartment and turn over all of her food stamps to Tasha. This situation went on for months until Jasmine texted the National Human Trafficking Hotline for help.

*Names and other details have been changed or omitted to protect the confidentiality of potential victims.



How Housing & Homelessness Systems may be Used in Trafficking Operations

The threat of being without a place to live, or a place to go, hangs over many trafficking victims at some point in their situation, whether it is a threat from their trafficker or implicitly tied up in the economic hardship they may be facing. Indeed, **64 percent of respondents to the Polaris survey reported that the lack of affordable housing was a barrier in their ability to leave their trafficking situation.** Some traffickers make use of this fear by constantly threatening their victims with homelessness as a method of coercion. In addition, some traffickers heavily monitor victims at their residences to ensure that when they are not working, they are also not out seeking help from others.

Formal Residential Brothels

According to a review of the 1,800 Hotline cases of potential residential sex trafficking, in addition to external research into publicly known cases, Polaris has come to understand nuanced information about the variations within this business model. While instances of commercial sex involving individual private/family households exist, typical hallmarks of formal/organized residential brothels are the use of multiple residences and the frequent rotation of victims between residences.

Large residential brothel operations often require complex networks of traffickers to rent multiple housing units, supervise victims and buyers at these units, transport victims between units, advertise to buyers, and facilitate money movement. In some situations, residential brothel operators “contract out” the recruitment, rotation, and control of victims to individual traffickers, while personally managing leases, supplying the brothels, and coordinating with buyers.

According to data from the Hotline, in some cases potential victims of formal residential brothels may be

housed onsite, while in others, they live offsite and are given assignments by their potential traffickers listing the residences they are instructed to work at in a given week.

Housing types used for these operations varies by geography. Examples may include: large apartment complexes in Houston, rowhomes in Philadelphia, upper story or basement apartments in New York City, and single family homes in suburban or rural areas. The main commonality in housing types is that these are typically rentals. In most known cases, traffickers put their own names on the leases, although multiple traffickers in a network typically hold the leases for different rentals, presumably to avoid coming to the attention of landlords or raising red flags with financial institutions. Less frequently, some networks pay others who are only loosely affiliated with the group to take out leases in their names. In rare cases, brothels are reported to be operating out of abandoned or condemned properties rather than rentals, or out of sheds or garages adjacent to single family homes. These situations often occur in conjunction with drug distribution operations, or “trap houses”.

Different trafficker business models gravitate towards differently-priced rentals. Many of the large apartment buildings used by potential residence-based sex traffickers have poor resident reviews and are in parts of town where housing is more affordable. This is particularly true of residential brothels run by traffickers targeting potential victims from Mexico and Central America, who typically use a business model reliant on short, low cost transactions and high customer volume.

By contrast, potential traffickers targeting women from East and Southeast Asia often operate illicit residential massage businesses out of higher-priced apartments

and use a business model that involves longer appointments with customers for significantly more money. This latter type of residential brothel is often harder for casual observers or property owners or managers to detect, since the low volume of transactions translates to much lower observable customer traffic.

Based on findings from the Polaris survivor survey, some traffickers also occasionally take advantage of public housing benefits to facilitate their crimes. Twenty percent of respondents to the relevant survey question indicated that their trafficker used public housing benefits to facilitate their crimes. However, it remains unclear whether traffickers operating formal residential brothels make use of public housing, or whether public housing benefits are primarily used by individual sex traffickers to house victims whom they are exploiting at other venues such as hotels, strip clubs, or escort services. It is also possible that some traffickers operating residential brothels take advantage of public housing to house victims offsite.

Residential Brothel Case Study: U.S. v. Aboulafia^{156, 157, 158}

In early 2013 in Washington state, six individuals were indicted for conspiracy to transport women for prostitution, conspiracy to use a communications facility to promote prostitution, and conspiracy to engage in money laundering. According to case evidence, the conspirators advertised women from Southeast Asia for 'massage services' on Backpage.com and had compelled the women into working for them by keeping them in massive debt and causing them to overstay their visas. Unlike most illicit massage businesses, however, this network ran their commercial sex operation out of apartments in Bellevue and Kirkland, Washington. They also operated apartments in Scottsdale, Arizona; Chicago, Illinois; and Falls Church/Tysons Corner, Virginia, according to court documents.

This operation was typical of many formal residential brothels. The leader of the scheme, Unruean Aboulafia, managed most of the strategic business plans of the network. This included working with recruiters in Thailand to maintain a supply of victims, advertising her business on websites such as Backpage.com, and managing the rotation of women between apartments. In order to maintain so many leases at the same time without raising suspicions, she recruited other individuals - paying family members and friends to take out leases in their own names. Some of these individuals were initially unaware that the apartments were being used for commercial sex, but most eventually became directly complicit in scheduling appointments with buyers and in laundering the proceeds from each location. As is typical for the residential illicit massage business model, the apartment complexes used by this network were mid- to high-cost complexes, which the group was able to pay for by charging high prices for appointments.

All members of the network ultimately pled guilty to money laundering charges, and Aboulafia additionally pled guilty to conspiracy to transport individuals for the purpose of prostitution.

Vacation Rentals

Vacation rentals are an interesting hybrid between the hospitality industry and private housing systems. As sites like Airbnb grow in popularity, research into the intersections of vacation rentals and trafficking will become increasingly valuable. However, based on conversations with survivors, some traffickers may sometimes choose to turn to vacation rentals instead of hotels since these properties are not monitored by police for trafficking or prostitution to the extent that hotels and motels are. One survivor of escort services whose trafficker preferred to utilize vacation rentals explained in a Polaris interview:

"[My trafficker] liked condominiums where you could rent out the condominium for a month or something like that. You just pay \$4,000 for a whole month for a three bedroom condo. With the vacation rentals we never had a time where we got caught by the owners [or police]. Just at the hotels."

Traveling sales crews are another type of trafficking business model that could utilize vacation rentals in place of hotels, as these options can often house far more people at a time for less than it would cost to rent multiple hotels rooms. Here too, vacation rentals are likely to receive less intense scrutiny by on-site owners or law enforcement.

Please see pg. 71 to see a list of possible indicators for hotels & motels that are also relevant to vacation rentals.

Sex & Labor Trafficking Occurring in Shelters & Residential Group Homes

As mentioned in the Health Care section of this report, the National Hotline has received reports regarding residents of shelters and transitional housing being forced into labor by the shelter/housing operators as a condition of their stay. This labor goes far beyond the typical communal chores expected by many shelter programs, and can involve agricultural work, landscaping, retail work, begging and peddling, construction, or other menial labor for upwards of 10-15 hours per day in some cases. Residents are typically not paid for this work. If potential victims refuse, they are reportedly threatened with homelessness. For residents who are there as a

mandate from the criminal justice or parole systems, or those escaping violence, these threats could have very real consequences to their freedom and safety. In less frequent cases from the Hotline, potential victims have been expected to provide commercial sex to buyers or engage in personal sexual servitude with the housing staff in order to continuing their stay.

Worker Housing in Labor Trafficking

While some employers engaged in potential labor trafficking of seasonal visa holders own the properties they use to house workers, others employers may rent short term leases on apartments or townhomes instead. According to many accounts from the National Hotline, it is all too common for seasonal workers to be housed in a single, overcrowded dwelling. Many workers who have reached out to the Hotline have reported not having their own bed, a lack of food storage space, broken plumbing or appliances caused by overuse, and not being able to shower due to the sheer number of occupants living in the space. Not only is this a violation of the workers' health and safety (and likely their visa contract), but it could be a serious fire code violation. It is also likely an infraction of the occupancy expectations outlined in most standard rental agreements.

Potential victims on the Hotline have also reported not being permitted to leave their residence - even on their off hours. They have reported being monitored inside and outside their homes by closed-circuit security cameras installed by their employers, and have to rely solely on their employers for any transportation. Therefore, neighbors and landlords may not witness potential victims coming and going normally from the home, and instead, they are always picked up and dropped off by their employer as a group.

How Housing & Homelessness Systems may be Used by Victims & Survivors

Shelter Needed in Survivor Aftercare

Just about daily, an advocate on the National Hotline can be overheard on the phone feverishly searching for a shelter that's not at capacity, pleading for a domestic violence safehouse to consider accepting a trafficking survivor into their program, or in the worst scenarios, safety planning with a survivor who must sleep outdoors that night because all other options have failed them. Housing and shelter requests are by far the most needed service for potential trafficking victims on the Hotline, but in many cases are the most difficult to fulfill.

Emergency shelter makes up an overwhelming 47 percent of all crisis requests to the National Human Trafficking Hotline.

Since December 2007, housing needs have made up 37 percent of all referral and crisis assistance requests to the National Hotline. Specifically, in crisis situations, emergency shelter makes up an overwhelming 47 percent of all crisis needs. Furthermore, **40 percent of survivors in Polaris's survey reported seeking shelter at some point during their trafficking.**

Just in the last five years, there have been noticeable improvements including runaway homeless youth shelters expanding their education on the trafficking risks of their residents. There has also been some progress in making space for underserved populations, like LGBTQ+ individuals, male survivors of sex trafficking, and individuals with disabilities who historically have

had even more difficulty accessing one of the scarce beds across the country. But there have also been major setbacks - shelters forced to cut services, roll back intakes, or close altogether due to funding constraints. These constantly evolving factors make it extremely difficult to even estimate the approximate number of shelter beds available to human trafficking survivors in the United States.

However, the most significant improvements in availability have come about as a result of the increased understanding of the overlap between domestic violence (DV) and human trafficking, which has resulted in DV shelters increasingly opening their doors to trafficking survivors. For example, every year since 2011, the National Network to End Domestic Violence (NNEDV) has included "Support/Advocacy to Victims of Trafficking" on the list of services they survey for during their annual National Census of Domestic

The inherent infrastructure and approach of domestic violence shelters simply put them in the best position to meet a trafficking survivor's needs in the many places where trafficking-specific shelters are either full, or more often, simply don't exist.

Violence Services. In 2016, the census indicated that out of 1,762 DV service providers (92 percent of all DV service providers in the country), 11 percent provided services to human trafficking survivors on the census day, while 72 percent reported to have served this population throughout 2016.¹⁵⁹ This is up from 2011 where only 7 percent of DV programs reported providing trafficking services on the census day and 58 percent throughout the year.¹⁶⁰

The inherent infrastructure and approach of DV shelters simply put them in the best position to meet a trafficking survivor's needs in the many places where trafficking-specific shelters are either full, or more often, simply don't exist. Beyond having the obvious education of the nuances of interpersonal violence, DV shelters also already have a unique understanding of safety concerns, confidential locations, and often provide the holistic services like therapy and case management needed by survivors of trafficking. The DV field has also been the trailblazer in developing the approach of trauma-informed residential services that have come to be essential for any individual escaping abuse.

However, some shelters who have not yet fully adopted voluntary services, or trauma-informed and culturally sensitive approaches may need to consider if their shelter framework, intended for DV survivors, may have adverse effects on any trafficking survivors in their care. For example, one sex trafficking survivor from a Polaris focus group explained her struggle in a DV shelter:

"When I got out of the trafficking I was put immediately by state patrol into a domestic violence shelter. It was the only shelter where I was from. I was their very first trafficking victim. So of course you put me with all these women who [were abused] by their husbands. [I was] a very different variety. Like, I couldn't sleep with the lights off. Of course I got myself kicked out because I couldn't function."

Additionally, while domestic violence shelters are much more likely to understand the nexus between sex trafficking and domestic violence, they are often unaware of the housing needs of labor trafficking survivors and their ability to serve this population effectively. Securing shelter for potential victims of labor trafficking, even if

their potential trafficker was an intimate partner, family member, or living within the same household, is still one of the greatest challenges that come through the National Hotline daily. Labor trafficking survivors often need the same trauma-informed services, confidential locations, and therapeutic approaches that DV shelters provide, but are unfortunately all too-often excluded in a DV shelter's scope of services. The National Hotline must then refer labor trafficking survivors to general population homeless shelters in the many areas where trafficking-specific services do not exist. One survivor of domestic work from a Polaris focus group explained how staying at a non-confidential homeless shelter eventually put her at risk:

"When I was in the homeless shelter my trafficker [found me] and called [the facility]. I have no idea how she found the number... So I believed her when she said "when you run, I'm going to find you and deport you."

Landlords and Residential Management Companies as Agents of Identification

The fact that potential traffickers often rent the residential properties needed for their businesses means that property owners, landlords, and management companies are often in a key position to help both identify potential victims and disrupt operations. Indeed, the Polaris survivor survey found that 56 percent of survivors had contact with a landlord or rental office during their trafficking, though it is unclear whether the actual commercial sex or labor was occurring at the residence where survivors had contact with rental agents.











The greatest potential of residential management companies and landlord identification lies within formal residential brothels. In some cases, they are actually on site and can see what is going on within these properties. In others, they are in a position to compare and draw conclusions from complaints by neighbors who likely have noticed suspicious activity. However, reports to the National Hotline from rental managers are relatively infrequent, and neighbors describing potential residential brothels often note that they have reported these indicators to their landlord or property management company, but have received no response to their report.

Private landlords are well-poised to recognize signs of potential trafficking at residential brothels, due to their proximity to the situation and ability to compare multiple complaints from neighbors.

These callers typically indicate that landlords or property managers were apparently uninterested in the report or claimed to be unable to do anything about the situation. The National Hotline has also received multiple reports of suspicious residential brothel activity from the same apartment complex, indicating that there may be a general pattern of landlords tolerating potential trafficking from these properties. However, in a minority of cases, landlords and property managers have called the National Hotline looking for resources and advice concerning specific units where these patterns of activity have been observed.

Potential Indicators of Sex Trafficking in Formal Residential Brothels

According to calls to the National Hotline, neighbors are significantly more likely to notice and report suspicious activity at a potential residential brothel, describing indicators such as:

-  Excessively high traffic of males in and out of the property
-  Apparent lack of freedom of movement for potential victims residing at the property
-  Evident monitoring of potential victims (e.g. security cameras installed)
-  Periodic rotation of potential victims
-  Signs of domestic violence or child abuse
-  Unusual amount of trash for the stated occupancy of the residence
-  Unusual entrance procedures by guests
-  Many taxis or rideshare drop offs and pickups by different guests
-  Many guests only visit for short increments at all hours
-  Residents rarely surfacing outside the home

One case that was discovered by a landlord, is the 2013 federally convicted case of U.S. v. Weston. In this case, prosecutors presented evidence that Linda Weston and members of her family, targeted victims with developmental disabilities and not only stole their Social Security benefits, but forced the victims into domestic work, commercial sex, and personal sexual servitude with each other. Up to six victims were starved, drugged, locked in an unfinished sub-basement, and subjected to abuse and neglect. Two died due to illnesses related to the abuse. According to court documents, several properties were leased by Weston in Philadelphia, PA, Norfolk, VA, and West Palm Beach, FL between 2001 - 2011.¹⁶¹ After one victim died in their Norfolk rental

which caused Weston to flee, that landlord filed a suit for alleged unpaid rent.¹⁶² According to one media article which interviewed the West Palm Beach homeowner, it wasn't until after the group moved out of the West Palm Beach home and the property owner reported \$50,000 in stolen property that he learned police frequently visited the home and discovered the squalid living conditions and lack of running water inside.¹⁶³ But ultimately, it was the Philadelphia landlord who was compelled to inspect the Weston basement after neighbors complained of frequent traffic, and after he noticed signs of unauthorized pets and needed repairs. It was there where he found four victims, one chained to the boiler, before calling police.¹⁶⁴



Housing & Homelessness Systems: Recommendations & Opportunities

For Federal and Local Governments, Private Foundations, and Individual Funders:

1. Increase Public and Private Investments into Housing and Shelter Programs

Polaris urges Congress and local governments to consider passing new legislation and expanding funding streams in existing policies that will subsidize and promote the creation of available housing, both for government housing, and in grants for private shelters. However, this responsibility does not fall squarely to government actors. Private foundations and individual donors should consider funneling their donations directly to programs which provide housing to survivors of all types of trafficking. This is an investment in the overall community. Furthermore, those responsible for writing grant requirements are encouraged to implement mandatory implementation of trauma-informed, voluntary services, and culturally sensitive modalities, as well as require awardees to accept survivors of all types of trafficking. With more available and affordable housing, especially for vulnerable populations who may be susceptible to being trafficked, traffickers will be less successful in luring people into human trafficking situations with the offer of housing.

2. Study and Replicate Innovative Local Housing Initiatives

Many cities and states have begun developing creative and resourceful housing initiatives to remove the housing barriers human trafficking survivors have faced. One example of an especially innovative approach is the housing pilot program for survivors of human

trafficking implemented by the Chicago Housing Authority, the Housing Authority of Cook County, and regional HUD and HHS offices. In 2016, several partners joined together, becoming the first in the nation to design a program to intentionally address housing issues for individuals experiencing homelessness and human trafficking. The program would offer 60 housing choice vouchers to eligible human trafficking victims over a period of three years.¹⁶⁵ Another strategic program is out of the North Dakota anti-trafficking NGO Youthworks. Using federal funds awarded in 2016, Youthworks began designating individual “host homes” for youth survivors up to age 22. Operating much like typical foster families, these host homes would undergo training, necessary background investigations, and be provided a monthly stipend to open their homes to temporarily host young trafficking survivors while more longer-term housing arrangements can be found.¹⁶⁶ These program models, and others like them, with proper evaluation, necessary funds, and refined lessons learned, could be useful for other communities to replicate across the country.

For Private Shelter Systems:

1. Publicize Housing Services for Immigrant Survivors of Human Trafficking

In 2016, three federal agencies, HUD, HHS, and the U.S. Department of Justice (DOJ), clarified to service providers who receive federal funding that providing services essential to protecting life or safety was paramount to the immigration status of the beneficiary. The detailed letter, which listed services that included housing, clearly stated that individuals must not be excluded on the basis of their immigration status.¹⁶⁷ Whereas service providers may have updated their

eligibility criteria to reflect this change, many callers to the National Hotline still indicate a lack of awareness of housing services available to human trafficking victims.

2. Domestic Violence Shelters Should Include Victims of Human Trafficking in their Target Population

When a trafficking-specific shelter is not available, domestic violence shelters, are the best suited out of any other institution to fill the gaps. Indeed, they provide the necessary trauma-informed services, confidential location, and safety considerations that trafficking and domestic violence survivors alike, desperately need. Although human trafficking victims may also fit into other populations, they are currently not included in the primary target population for many shelters whose focus falls under the general umbrella of domestic violence. While building up the housing capacity of trafficking-specific organizations is of course a great need, a more immediate response can be domestic violence shelters including sex and labor trafficking survivors in their target service population and accepting them more routinely. In fact, they are often already serving domestic violence survivors who have also experienced forced labor or commercial sex, without even knowing it.

In limited cases, funder requirements may limit a DV shelter's ability to accept human trafficking survivors. However, in most cases, it's simply due to discretionary policies, or an outdated institutional definition of domestic violence. Proper staff training on the nuances of human trafficking, coupled with the trauma-informed modalities that many DV coalitions already encourage, are generally all that is needed to adapt the shelter for the needs of a trafficking survivor. In shelters where these approaches have not yet been adopted, programs are encouraged to examine the benefits that they can have on both DV and trafficking survivors alike.

Adapting Domestic Violence Shelters to Integrate Human Trafficking Survivors

Below are just some considerations when attempting to adapt a shelter program designed for domestic violence survivors, to also provide service to human trafficking survivors. This is by no means a comprehensive list. In many cases, the foundational elements of fully voluntary services and trauma-informed and culturally sensitive approaches can be more than suitable and would also apply to the domestic violence survivors already served by the shelter.

1. Examine your agency's definition of domestic violence and if it could potentially be expanded. Many organizations limit their definition of "domestic violence" to violence perpetrated by intimate partners only. While this is certainly the case for many survivors of trafficking, it excludes most who may have been victimized by someone they identify as their pimp, a family member, or an employer. If funder requirements allow, whenever possible, consider expanding your agency's definition to a more expansive one that would include all forms of interpersonal violence.

2. Required employment. Many victims of trafficking do not have traditional employment histories or they may have criminal histories, which may prevent them from landing a job in the mainstream economy. Foreign national survivors can be without work permits and some labor trafficking survivors may find immediately returning to work extremely traumatizing due to their past experience. Consider alternative policies like encouraging school enrollment, ESL classes, or providing job readiness training.

3. Mandatory group counseling. Some DV programs require residents to participate in mandatory group counseling sessions. Some survivors of trafficking who have received services from DV shelters have reported feeling isolated and stigmatized by fellow residents since their entire experience is not shared and is often misunderstood among the DV survivors.¹⁶⁸ Being required

to openly share the details of their experience in a group setting can not only be triggering, but further alienate the survivor from the household and can make them question their choice to seek assistance. However, simply reverting to a voluntary services model, which is already a well-documented best practice in the DV field, could generally improve this issue.

4. Rejecting survivors with substance use histories. Although these policies are often well-intended and put in place for the safety of other residents, and to encourage healthy living, it is frankly unrealistic to expect some survivors to not struggle with the realities of substance use, especially when exiting a sex trafficking situation where an addiction may have been instigated and heavily managed by their trafficker. Even if the substance use was not a main part of their control, it has been well-documented that survivors of trauma typically use drugs and alcohol to self-medicate and disassociate from painful traumatic responses. Instead of disqualifying shelter applicants who have histories of substance use, consider partnering with local substance use disorder treatment programs to equip these residents with the treatment and support they need during their stay.

5. Required chores. Survivors of domestic work may find performing some household chores extremely triggering and re-traumatizing since they can often mirror the experiences of their servitude. While all residents of course should still do their part to maintain the cleanliness of their individual and communal areas, consider working with the survivor to identify chores that they feel most comfortable and able to perform. This is no different from the regular accommodations shelters often provide for individuals with physical disabilities.

6. “Locked down” facilities. Instituting “lock down” rules where residents are unable to leave the premises can feel like prison and can often mirror the isolation and confinement trafficking survivors were subjected to in their situations. This is of course applicable to many survivors of domestic violence as well.

7. Legal issues. Trafficking survivors, especially those with a precarious immigration status, can have complex and nuanced legal needs associated with their trafficking experience. If your agency does not have legal representation that specializes in these trafficking-related issues, consider collaborating with a nearby legal service provider who does. The online [National Human Trafficking Referral Directory](#) or the [Human Trafficking Legal Center](#) can help identify appropriate services local to your area.

Some other resources for domestic violence organizations looking to improve their services for trafficking and domestic violence survivors are below:

- [Serving Human Trafficking Victims: An Introduction for Domestic Violence Organizations](#) [National Human Trafficking Hotline]
- [Human Trafficking and Domestic Violence Fact Sheet](#) [Human Trafficking Legal Center]
- [Toolkit for Building Survivor-Informed Organizations](#) [National Human Trafficking Training & Technical Assistance Center (NHTTAC)]
- [SOAR to Health and Wellness Training](#) [NHTTAC]
- [How the Earth Didn't Fly into the Sun: Missouri's Project to Reduce Rules in Domestic Violence Shelters](#) [Missouri Coalition Against Domestic & Sexual Violence]
- [Creating Trauma-Informed Services Tipsheet Series](#) [National Center on Domestic Violence, Trauma & Mental Health]

1. Obtain Training on How to Identify and Respond to Human Trafficking on Properties

Rental management companies, apartment and townhome complexes, and individual landlords should commit to receiving comprehensive training to help them understand and detect possible human trafficking. Furthermore, real estate owners should require management companies they contract with to undergo training as a condition of their business. Rental management companies could be on the front lines to detect trafficking in residential brothels, domestic work, pornography, remote interactive sexual acts (a.k.a. “webcam houses”), personal sexual servitude, and a whole host of labor trafficking types where multiple victims may be housed together such as in agriculture, nail salons, factories, and restaurants. Trafficking isn’t just contained within residences, as rental management companies should also do their due diligence to make sure their vendors, especially those providing landscaping and commercial cleaning services, are adhering to ethical workplace practices.

64% of responding survivors to the Polaris survey reported losing their housing due to their trafficking or related abuse.

2. Support Survivors by Including Housing Protections in Lease Agreements (adapted from VAWA Reauthorization of 2013)

According to the Polaris survey, 64 percent of responding survivors reported losing their housing due to their trafficking or related abuse. Currently, all HUD housing programs require compliance with the housing protections for domestic violence, dating violence, sexual assault, and stalking, outlined in the 2013 reauthorization of the Violence Against Women Act (VAWA)¹⁶⁹, and many states have laws requiring private landlords to offer similar housing protections. Even if you are not affiliated with HUD and/or your state is not one of the leaders in housing protections for victims of crime, implementing some basic rights and protections into your standard lease agreements shows your tenants (and your community at large) that you stand up for survivors of violence. To ensure that all victims are protected, go one step further and explicitly mention survivors of human trafficking in all relevant clauses. If local laws allow, residential management companies and landlords can ensure that all leasing agreements include clauses such as:

- Protecting survivors from housing discrimination, eviction, or other punishment based on their status or history as a victim of crime
- Protect survivors’ right to call the police for emergency assistance
- Allowing a victim to break a lease without penalty with adequate documentation of their victim status
- Affording victims the right to have their locks changed, or other reasonable security enhancements
- Commitment to upholding any and all protection orders in place
- Ensuring complete confidentiality of all housing records and documented victim status

If you’re from a residential management company and want to learn more about working with Polaris, please contact corporateengagement@polarisproject.org

Glossary

Systems and Industries	
Financial Services Industry	Encompasses anything within the purview of the formal financial services industry including institutions and initiatives such as retail banks, commercial banks, financial crimes monitoring, money transfers, formal paychecks/payroll, credit/debit cards, investments, virtual currency exchanges, etc.
Health Care	Includes but is not limited to, preventative care, emergency health, reproductive health, other medical specialties, mental health, dental, vision, and substance use disorder treatment. This report also includes the services and benefits afforded to individuals with disabilities.
Hotels/Motels	Business establishments whose primary purpose is to provide short-term lodging and accommodations for travelers.
Housing & Homelessness Systems	Encompasses either: <ol style="list-style-type: none"> a. Any institution or agency whose primary purpose is providing safe and operational housing for a community. This includes governmental agencies like HUD and local housing authorities, and private entities such as apartment management companies, landlords, etc. OR; b. Any system or agency which provides safe shelter services to individuals experiencing homelessness or unstable housing. This includes, but is not limited to emergency shelter, transitional shelter, domestic violence shelters, and long-term supportive housing.
Social Media	Encompasses online websites or platforms whose intended purpose is to foster the connection of people to share ideas, interests, and information. Examples include: Facebook, Instagram, chat services, dating sites, etc. <ul style="list-style-type: none"> • NOTE: This DOES NOT include online platforms whose primary intended purpose is to connect people to commercial goods or services (e.g. Backpage, Craigslist, john boards, Yelp, Groupon, etc.)
Transportation Industry	Encompasses any type of publicly or privately owned and operated mass transportation systems including buses, subways, trains, airlines, taxis, and ridesharing services, as well as private transportation like a personal vehicle or rental car.

Miscellaneous Terms

"Bottom"/"Bottom girl"	A slang term used by some American pimps to refer to a victim still under their control but who has "earned" more "privileges" and a higher ranking among the other potential victims. Bottoms are typically manipulated into sharing some the recruitment and enforcement responsibilities with the actual trafficker, but are often still victims themselves. For more information on the plight of a bottom girl, Polaris recommends reading the four-part blog series, Unavoidable Destiny, by survivor leader Shamere McKenzie on the Shared Hope International blog. ¹⁷⁰
Case	A data record from the National Human Trafficking Hotline which refers to an individual situation of potential human trafficking. Polaris and the National Hotline use the U.S. federal definition of human trafficking when assessing cases. (Data timeframe of December 7, 2007 - December 31, 2017)
In-calls	Occurs when buyers go to the victim's location for commercial sex acts.
Individual potential victim profile	A data record from the National Human Trafficking Hotline which refers to a potential victim uniquely identified in potential human trafficking and labor exploitation cases. (Data timeframe of January 1, 2015 - December 31, 2017)
Labor exploitation	A labor situation involving workplace abuse and/or related labor violations, which does not contain at least moderate elements of force, fraud, or coercion compelling the person to remain in the situation.
"The Life"/"The Game"	The commercial sex industry.
National Hotline	National Human Trafficking Hotline: 1-888-373-7888 or Text BeFree (233733)
Out-calls	Occurs when a victim goes to or is delivered to a buyer's location for commercial sex acts.
Survival sex	The exploiter is supplying the victim with basic living necessities (shelter, food, clothing, drugs, medication, etc.) in exchange for sex. This arrangement could be voluntary (with adults 18+), exploitative, or rise to the level of sex trafficking (See: Personal Sexual Servitude), depending on the conditions. However, unless otherwise stated, when referenced in this document, it is solely regarding instances of sex trafficking.
Track/Stroll/Blade	An outdoor section of a street block used to solicit sex.

Miscellaneous Terms

<p>Trauma-informed care</p>	<p>“A program, organization, or system that is trauma-informed:</p> <ul style="list-style-type: none"> • Realizes the widespread impact of trauma and understands potential paths for recovery; • Recognizes the signs and symptoms of trauma in clients, families, staff, and others involved with the system; • Responds by fully integrating knowledge about trauma into policies, procedures, and practices; and • Seeks to actively resist re-traumatization.”¹⁷¹
<p>“Trick”/“John”/Buyer</p>	<p>A buyer of commercial sex acts.</p>
<p>Type (e.g. Type of Human Trafficking)</p>	<p>Polaris has defined a particular type of human trafficking as a unique industry or business model used to exploit people for commercial sex or labor/services. Each type becomes distinct when aspects regarding business operations, trafficker and victim profiles, recruitment, and institutional systems and industries used are sufficiently different from another. Please see our preceding report, The Typology of Modern Slavery for more information.</p>
<p>Voluntary services model</p>	<p>“Voluntary services, as opposed to mandatory services, means that clients do not need to complete a program or take part in other services as a condition of receiving housing. Services are offered based on each person’s specific needs.”¹⁷²</p>

References

Methodology

1 Labor exploitation statistics are non-cumulative. A single labor exploitation case may involve multiple types.

2 Polaris uses the United States federal definition of human trafficking as defined by the Trafficking Victims Protection Action (TVPA) to determine if a situation described through the Hotline has indications of human trafficking. Cases which fully meet the TVPA's standard are labeled as having "high-level indicators of trafficking." Cases which partially meet the TVPA's standard but are missing pieces of information needed to make an assessment are labeled as having "moderate-level indicators of trafficking."

3 Please see the methodology for *The Typology of Modern Slavery*, which can be found at: <https://polarisproject.org/sites/default/files/Polaris-Typology-of-Modern-Slavery.pdf> (pg. 7).

4 In these cases, the signaler could have been reporting a situation that had at least moderate indicators of human trafficking, but the signaler's proximity to the situation prevented him or her from being able to identify individual victims. For example, a signaler could report a known potential trafficker, but not have any details about the trafficker's potential victims.

5 In order to protect the identity of survey respondents, Polaris chose not to disclose information about types of trafficking associated with fewer than three survivors.

6 The survey also had sections dedicated to the child welfare system, business regulatory systems, and temporary work visas to help inform other/future Polaris initiatives. This data is omitted from this report.

7 Labor trafficking focus group also covered discussion on temporary work visas in order to inform other Polaris initiatives.

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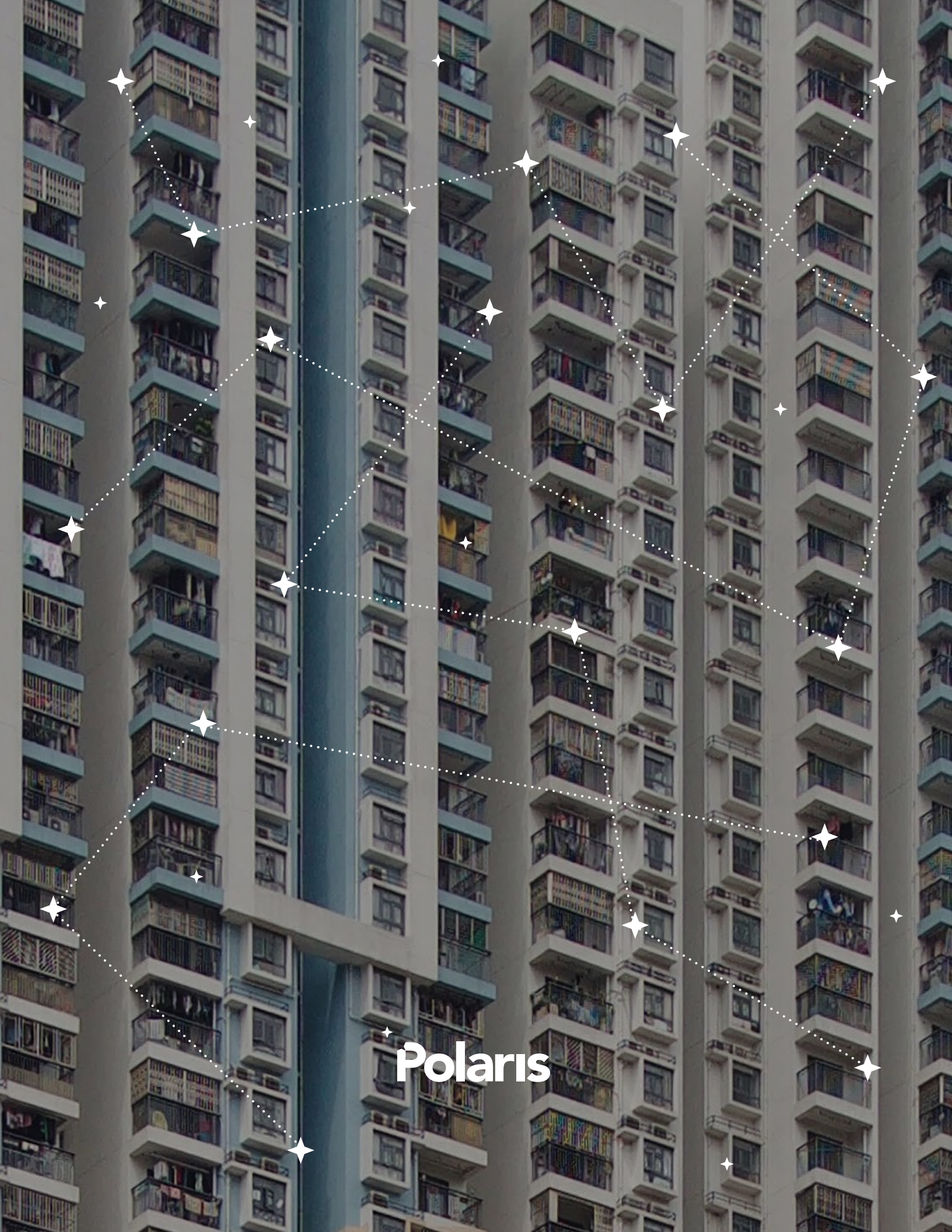
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