

Child Sex Trafficking – ECCR Report and collaborative CCLA-led engagement raises standards amongst hotel groups

In 2011 [ECCR](#) released the report '[Hotels, Sex Trafficking, and London 2012](#)'. Commissioned by [CCLA](#), the specialist Church, Charity and Local Authority investment manager, this report highlighted the extent of human, and specifically child, sex trafficking within the UK. The Report built upon longstanding activities conducted by members of the US based Interfaith Center for Corporate Responsibility (ICCR) that encouraged hotel groups to take steps to mitigate the risk of their facilities being used for these purposes during major sporting events.

The release of the report also marked the beginning of CCLA's successful engagement with the two FTSE 100 constituent hotel groups - Whitbread, the largest hotel provider in London, and InterContinental Hotels Group (IHG), whose brand Holiday Inn was an Olympic sponsor. CCLA led this process on behalf of their Church and charity clients, the wider [Church Investors Group](#), ECCR, and an international consortium of concerned investors incorporating many ICCR members. The focus of this engagement was not just to encourage the companies to take steps to mitigate the risk of their facilities being used for child sex trafficking during the London Olympic and Paralympic Games, but to put in place suitable policies across all of their activities. The intensive process took place over two years and had seven key asks of the companies:

- To either adopt 'The Code', as created by the NGO End Child Prostitution and Trafficking (ECPAT), or to make significant contributions to other anti-trafficking initiatives.
- Sign the UN Global Compact.
- Have a company specific human rights policy and, subsequently, to ensure this policy referred to sex trafficking.
- Conduct training with their staff, and raise awareness amongst guests, to better enable them to identify activities and know escalation processes.
- Have anti-trafficking clauses in supplier and franchisee contracts.
- Engage with local stakeholders.
- Report on the steps they have taken to mitigate the sex trafficking risk.

Although the two hotel groups are yet to sign up to the ECPAT Code, both now actively participate in the International Tourism Partnership's collaborative [human trafficking program](#) and have responded to the engagement by taking significant positive steps to mitigate sex trafficking risk in their own hotels. An overview of each group's progress against the engagement's key asks are listed in the table below. Although it is not possible to go into detail on all of the actions taken within this short article, two of the wider steps taken are of particular note.

- Following the initial engagement both Whitbread and IHG consulted expert groups, including the Metropolitan Police's specialist trafficking unit and the Institute for Business and Human Rights, in assessing and implementing the

practical steps that they should also take to mitigate wider trafficking risk in their other business areas.

- Building upon training sessions for all UK IHG branded hotels, organised ahead of the Olympic Games on how to identify the signs of human trafficking issues and respond to incidences appropriately, IHG updated its [corporate responsibility framework](#) to explicitly identify and further prioritise both sex, and wider human, trafficking as important issues for their work. This had been a key factor identified within the initial ECCR report.

Following the completion of the intensive phase of this engagement both companies still have significant steps to take. Amongst other activities both are investigating how their awareness raising activities can be conducted across the entirety of their hotel operations and it is heartening to see them reach out to expert groups and their peers within the sector on how best to do so. Both CCLA and ECCR are pleased to note the practical steps that have been initiated as a result of the report and subsequent engagement. We are hopeful that the steps taken by both companies will impact positively upon the lives of the victims of child sex trafficking and look forward to seeing these being further embedded and built upon across both groups.

For further information on the engagement please contact james.corah@ccla.co.uk.

20 February 2013

FTSE 100 Listed Hotel Group's Response to Engagement

Action	Report*		November 2011**		May 2012**		January 2013**	
	IHG	Whitbread	IHG	Whitbread	IHG	Whitbread	IHG	Whitbread
Adopted the ECPAT Code	No	No	No	No	No	No	No	No
Participates in other trafficking initiative	n/a	n/a	Yes	Yes	Yes	Yes	Yes	Yes
Signatory to the Global Compact	Yes	No	Yes	No	Yes	No	Yes	No
Company Specific Human Rights Policy	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Company Policy Explicitly Refers to sex Trafficking	No	No	Not Yet	Not Yet	Not Yet	Not Yet	Not Yet	Not Yet
Conducts Staff Training on Trafficking Issues	Some Evidence	No Evidence	Some Evidence	No Evidence	Yes	Yes	Yes	Yes
Clause in Supplier/Franchise contracts	No Evidence	No Evidence	No Evidence	No Evidence	Yes	Yes	Yes	Yes
Guest Awareness Raising	No Evidence	No Evidence	No Evidence	No Evidence	No Evidence	In Progress	No Evidence	In Progress
Engages with local stakeholders	No Evidence	No Evidence	No Evidence	No Evidence	No Evidence	Yes	Yes	Yes
Reports on anti-trafficking activities	No	No	No	No	No	No	No	No

* Based solely upon publically available information

** Based upon publically available information and information derived through engagement