



NO VACANCY FOR CHILD SEX TRAFFICKERS IMPACT REPORT

The Efficacy of ECPAT-USA's Work to
Prevent and Disrupt the Commercial
Sexual Exploitation of Children in Hotels

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We are extremely grateful to the NYU Wagner Capstone team who conducted the study referenced in this report: Stefano Biguzzi-Velcich, Dana Laventure, Sarah Rosenwasser, and Adam Younger, and also to Professor Meredith Seife who oversaw the study.

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No Vacancy for Child Sex Traffickers Impact Report

Child sex trafficking is a problem across the United States. Children as young as 12 and 13 are integrated into the sex industry and are bought and sold alongside adults.¹ While the hospitality industry is not responsible for the exploitation, it does have an important role to play in helping to stop it. Thirteen years ago ECPAT-USA set out to engage the United States travel and tourism industry in protecting children from sex trafficking. This report shows the results of that effort. An evaluation study conducted by the NYU Wagner Graduate School of Public Service has collected data demonstrating the results of this work. We now know that half of all hotels in the U.S. have training about how to prevent and disrupt child sex trafficking

and at least 35% of those have ECPAT-USA training. Additionally, most hotel properties received training from their parent companies,² which reinforces the efficacy of partnering with hospitality brands to reach properties on the ground level.

This impact report described has four sections. The first is a discussion about why and how ECPAT-USA works with the hospitality industry. The second section is a description of the resources and tools that are now available to the hospitality industry throughout the United States. These have been made possible because of the industry's willingness to invest resources into creating and disseminating them. The third section is a description of the extent and impact of training now available to the hospitality industry in the U.S. The fourth and final section contains recommendations for how to continue and expand the success that has been achieved.



Why Engage with Hotels?

Child sex trafficking is one kind of human trafficking.³ With the use of online classified ads, child sex trafficking is both on the streets and behind the closed doors of local hotel rooms. Pimps rent rooms in hotels, then go online to create advertisements in adult sexual services pages, and finally sell victims in hotels or have victims meet purchasers at nearby hotels. Hotel rooms are a preferred venue for the sale of children because traffickers believe they are anonymous at hotels, giving them a sense that there is little risk in their behavior. They also believe that hotels are risk-free because they believe training on indicators of child sex trafficking is not widespread. In a study by John Jay College of Criminal Justice and the Center for Court Innovation on commercial sexual exploitation in New York City, researchers found that 45% of youth victims surveyed were exploited in hotels.⁴

Contrary to what many people think, child sexual exploitation takes place in hotels of all types. Most people believe that exploitation only happens in budget hotels or hotels close to an airport but luxury or branded hotels are also used by abusers. Former Subway restaurant spokesperson Jared Fogle engaged in commercial sex acts with minors in luxury hotels such as the Plaza Hotel in New York City.⁵

However, the use of hotels in the sexual exploitation of children also means that hotels can play a key role in preventing and disrupting the commercial sexual exploitation of children. Hotel employees are more likely to witness human trafficking than the average person, and they can be trained to recognize and report suspected incidents to the appropriate authorities.

ECPAT-USA is a leader in the U.S. and around the world in working with the hospitality industry to combat child sexual exploitation. In 2004, ECPAT-USA launched the Tourism Child-Protection Code of Conduct (The

Code) in North America at a high profile event hosted by UNICEF and attended by dignitaries such as Queen Silvia of Sweden and Ambassador John Miller. The Code is an internationally accepted set of guidelines with six steps that companies take to protect children from sexual exploitation. One of the six steps of The Code is to train employees. By providing awareness, tools and support to the tourism industry, The Code seeks to prevent the sexual exploitation of children.

As of 2016, more than 35 U.S.-based companies, associations and travel affiliates had signed The Code, including many hotel chains. In addition to signatories like Delta Air Lines, major hotel brands that have signed The Code include Hilton Worldwide, Wyndham Worldwide and Carlson.

Carlson was the first company to sign The Code in the U.S. at the 2004 launch.⁶ ECPAT-USA also partnered with Marriott International to develop an online training module for hotels to understand the issue, the indicators and how to respond to suspicious activity. The training is made available in partnership with the American Hotel and Lodging Association, the primary hospitality industry trade association in the country.



Tools and Resources for the Hospitality Industry

Since ECPAT-USA introduced the Tourism Child-Protection Code of Conduct in North America in 2004, there has been tremendous progress in the development of tools and resources for the hospitality industry. The implementation of these tools and resources have led to widespread knowledge on the part of the hotel industry throughout the United States and across the globe. This section describes these tools and resources and how they have led to increased protections for children.

American Hotel & Lodging Association (AHLA)

The American Hotel & Lodging Association is the primary hospitality trade association in the United States. Its extensive membership and reach makes it a key resource for training and communicating with hotel brands. In 2016, ECPAT-USA partnered with Marriott International to develop an online training to help hotel employees prevent all forms of human trafficking, including the commercial sexual exploitation of children. This training received input from Polaris and the American Hotel and Lodging Association.⁷ AHLA also released Hotel Industry Principles to raise awareness and equip hotel employees to fight child sexual exploitation.⁸

The Code

The Tourism Child-Protection Code of Conduct (“The Code”) is an initiative to provide support to the travel and tourism industry in preventing the sexual exploitation of children. The Code has six criteria, which companies agree to implement when they join:

1. Establish corporate policy and procedures against sexual exploitation of children.
2. Train employees in children's rights, the prevention of sexual exploitation and how to report suspected cases.
3. Include a clause in further partner contracts stating a common repudiation and zero tolerance policy of sexual exploitation of children.
4. Provide information to travelers on children's rights, the prevention of sexual exploitation of children and how to report suspected cases.
5. Support, collaborate and engage stakeholders in the prevention of sexual exploitation of children.
6. Report annually on the company's implementation of Code-related activities.

Training Through Brands

With ECPAT-USA’s help, hotel brands develop and implement training that they make available to the properties in their portfolios. For example, Hilton has training that is available online to all of their brands including Hilton Hotels & Resorts, Waldorf Astoria Hotels and Resorts, Canopy by Hilton, Conrad Hotels & Resorts, Curio, Tapestry Collection by Hilton Doubletree by Hilton, Embassy Suites, Hilton Garden Inn, Hampton, Tru, Homewood Suites by Hilton, Home2 Suites by Hilton and Hilton Grand Vacations. ECPAT-USA partners are not limited to members of The Code. Companies that do not sign The Code often use its steps as a model to develop internal training, policies and programmatic efforts to protect children. ECPAT-USA acts as a strategic advisor on such efforts. A key to the success of this approach is to use best practices that will create consistency across properties within a brand’s portfolio as well as across brands in the hospitality industry.



Hotel managers who have undergone training are more aware of child sex trafficking when it happens, or more willing to report it, than those who have not been trained.

Extent and Impact

ECPAT-USA PARTNERSHIPS

Through ECPAT-USA's Code of Conduct initiative as well as partnerships and collaborations with industry associations, stakeholders and non-Code members, research shows there is widespread impact.

Six out of the 10 largest hotel chains in the world partner with ECPAT-USA and have access to training

By partnering with major hotel chains, ECPAT-USA has wide reach in the industry. Six of the largest 10 hotel chains in the world partner with ECPAT-USA: Accor Hotels, Carlson Rezidor Hotel Group, Choice Hotels, Hilton Worldwide, Marriott International and Wyndham Hotel Group.⁹ Employees and franchisees of these hotel brands have access to training. In 2016, Marriott International partnered with ECPAT-USA to develop online human trafficking training for their employees. The training was made available through a partnership with the American Hotel and Lodging Association and is used by hotel brands across the industry.¹⁰ In January 2017, Marriott International made it a requirement for all associates globally to complete human rights training that specifically focused on preventing all forms of human trafficking. This training requirement creates consistency across the brand. Similarly, as a brand standard, Hyatt International mandates that all hotels take human trafficking training but does not specify which training franchised hotels participate in.¹¹

40% of all hotel properties in the United States have access to training from ECPAT-USA

The hotel brands ECPAT-USA partners with, which include the six brands mentioned above and a number of other companies, represent 21,869 hotel properties in the United States. These properties make up 40% of the total hotel properties in the United States according to totals from the American Hotel and Lodging Association.¹² This means that ECPAT-USA training is accessible to employees in 40% of U.S. hotels, enabling hundreds of thousands of employees to recognize and

report child sexual exploitation. Hotel brands must work with their properties to ensure training is offered and utilized often.

THE STUDY

ECPAT-USA worked with the NYU Wagner School to develop and carry out a survey to better understand the reach and success of hotel engagement. The project was overseen by NYU Wagner School Adjunct Assistant Professor of Public Service Meridith Seife and conducted by a team of four students pursuing master's degrees. The NYU Wagner team generated a randomized list of 600 hotels in the United States, selected from a random list of zip codes. They then developed and conducted a telephone survey to hotel managers.

Conducted from January to April 2017, the survey consisted of 13 to 19 multiple-choice questions, depending on responses, and one open-ended question.

Half of Hotels Had Training, Many from ECPAT-USA

The study found that half (52%) of U.S. hotels from a nationally representative, randomly selected sample reported receiving training to help prevent child sex trafficking. As mentioned earlier, hotel associates are uniquely positioned to combat the commercial sexual exploitation of children. With half of the hotel managers reporting that their hotels have received training to address child trafficking, there has been significant progress in training hotels to prevent and disrupt child sexual exploitation. Many hotels are taking steps to be proactive by reaching out for training. There is still work to be done, as half of respondents reported not receiving training to help prevent and respond to child sex trafficking; these hotels need to be reached.

Hotel brands must ramp up communications with their properties and ensure training happens regularly. While many are utilizing ECPAT-USA training, there are more hotels to reach.

More than one third of the hotels that reported receiving training (35%) received ECPAT-USA training. That percentage may even be higher since 22% of hotels reported that they did not know where their training came from.

This study confirmed that ECPAT-USA's work to train private partners through the Tourism Child-Protection Code of Conduct, the American Hotel and Lodging Association partnership and other avenues has significant industry-wide reach, though there is still room to grow.

Importantly, hotel brands must ramp up communications with their properties and ensure training happens regularly. With ECPAT-USA training having a potential reach of about 40% of the hotel properties in the US, the findings of the NYU Wagner study suggest that some properties who have access to trainings through ECPAT-USA partnerships are not taking full advantage of training opportunities. While many are utilizing ECPAT-USA training, there are more hotels to reach.

Hotels with Training Reported More Knowledge of Child Sexual Exploitation

The NYU evaluation also showed progress in the knowledge hotel associates have about child sex trafficking. Hotels who received training reported that their associates had an increased knowledge of child sex trafficking. Of hotel managers whose hotels received training, 84% said their associates' awareness of child trafficking increased within the last three years. In comparison, only 16% of managers whose hotels did not receive training said their associates' awareness increased during that time.

Most managers who worked in hotels that received training also reported that they were aware of their state laws on child trafficking—82% of respondents reported that they were aware, compared to just 19% of managers in hotels that had not received training. Together these findings suggest that training increases hotel associates' knowledge of what child sex trafficking is and what relevant state laws say about the issue. In fact, the managers agreed—93% of managers

with training who said they had increased knowledge said the increase was a result of their training.

The findings may also suggest that hotel managers who have received training are more aware of child sex trafficking that is occurring in the area around their hotels. While only 13% of respondents reported that they knew of child trafficking or suspicious activity in the area around their hotels in the past 3 years, more than two-thirds of those who did know of such activity engaged in training on child sex trafficking. It is not surprising that few managers reported that they knew of child trafficking or suspicious activity since child sex trafficking is hidden and rarely reported. Yet it is clear that the sexual exploitation of children does take place in hotels, as shown in past research¹³ and court cases. Therefore the NYU Wagner study suggests that hotel managers who have undergone training are more aware of child sex trafficking when it happens, or more willing to report it, than those who have not been trained.

Most Hotels Get Training Through Their Brands

The findings of the NYU Wagner study suggest ECPAT-USA's strategy of reaching out to hospitality brands to train hotel associates is effective. Of hotel managers who indicated that they had undergone anti-trafficking training, most (63%) reported they had training through their brand. Additionally, if they had not had training, 32% of managers said it was because training was not offered by their brand. This was the second most common response, only after "don't know why"/"other." This shows that reaching out to hospitality brands can have a large impact on efforts to combat child sex trafficking. ECPAT-USA can increase the prevalence of training nationwide by continuing to expand outreach with brands.

Hotels Are Open to Training

Of hotels who had not received training, only 10% of respondents said it was "not necessary." This suggests that hotel associates who have not been trained would be open to training, if it were available to them. Brands can work with ECPAT-USA to bring training to their properties, and this study suggests it will be well received by hotel associates.

Recommendations

Considering the findings communicated in this report, there are key steps the private sector, governments and the public can take to combat child sex trafficking, specifically in relation to hotels.

PRIVATE SECTOR

1. Adopt policies and procedures related to the sexual exploitation of children and have resources available to employees.

Hospitality brands must develop policies that state a clear repudiation and zero tolerance policy of sexual exploitation of children, and develop procedures for associates to respond to suspected instances of such exploitation. Official policies send a message to associates that putting an end to the commercial sexual exploitation of children and human trafficking is important to the company. Policies also alert associates that engagement in exploitative behaviors is not tolerated and empowers them to become knowledgeable on indicators of trafficking so they can report their suspicions. Policies will also build a sense of pride in employees for their responsible employers. In addition to a corporate policy, companies must provide their employees with a protocol (procedure) for responding to any suspicions of exploitation. Employees must know what to look for and what to do should they suspect trafficking is occurring. Brands must develop or share existing resources to train their associates to recognize and respond to instances of child sexual exploitation, and have these resources easily accessible to all associates.

2. Mandate that all associates working in all hotel properties within their portfolio have training.

Hotel brands who offer training for their employees have taken an important step to combat child sexual exploitation, but brands must mandate that all associates in all properties take this training. Employee training is the mechanism for sensitizing employees to the issue of commercial sexual exploitation of children and human trafficking. Employees who are well-trained on the issue will comfortably execute their company's

protocol for responding to the issue. This prevents employees from frantically reacting to situations, which could lead to violence from an exploiter or an unnecessary scene. We strongly recommend that this issue become part of on-the-job training. While the NYU Wagner study did show that ECPAT-USA trainings have far reach, it also found that training does not always reach the front-line of hotels. Some hotel properties whose parent companies have policies and commitments to protect children are not training on the issue. This is an ongoing challenge with hotels that do not mandate but only suggest training to properties in their portfolio. With 52% of hotel properties in the U.S. being franchised, rather than owned and operated by hotel brands themselves, training must be required at franchised properties as well.^{14 15} To date, a number of brands have moved towards requiring instead of suggesting training to properties and other brands must follow. In addition, hotels must obtain information on training numbers and survey their properties to ensure that training is effective. This will ensure that all associates are adequately trained if an instance of trafficking does occur, and able to represent the brand well.

3. Increase transparency about training and implementation of policies in hotels.

In order for training and policies to be successful, minimum standards need to be met across all hotels. Transparency about training and implementation of policies in hotels is essential so that knowledge can be shared and improvements can be made when necessary. Transparency also lets the public know what is being done to combat these issues and makes

With ECPAT-USA training having a potential reach of about 40% of the hotel properties in the US, the findings of the NYU Wagner study suggest that some properties who have access to trainings through ECPAT-USA partnerships are not taking full advantage of training opportunities. While many are utilizing ECPAT-USA training, there are more hotels to reach.



hotels safer for everyone. Policies regarding child sex trafficking must be clearly stated and easily accessible on brand websites, and training data must be collected and disseminated.

4. Encourage reporting, so that associates feel comfortable reaching out to management.

It is important for brands to encourage reporting from the top, and to create an environment where all associates feel comfortable reaching out if they suspect an instance of trafficking. Brands and hotel managers must make it clear that reporting suspected incidents of trafficking to supervisors is encouraged, and not something that will reflect badly on properties and associates.

5. Develop and sustain relationships with trained law enforcement to respond to cases, and nonprofit organizations working in the field.

No one group can fight human trafficking alone. By coordinating with law enforcement and local nonprofit organizations who have experience responding to child sexual exploitation, hotel brands can utilize

information and resources that already exist, and form partnerships to better address this issue. When multiple sectors coordinate to combat the commercial sexual exploitation of children, they avoid duplicating work that someone has already done and all sectors are more successful.

6. Use travel suppliers that have policies and training on child sexual exploitation (non-travel corporations).

All companies must use travel suppliers who have policies and training on the commercial sexual exploitation of children when planning travel and partnerships. This protects companies from the risk of being associated with hotels and other tourism brands that may not handle instances of child sex trafficking properly. Companies must look for travel suppliers who have clear policies against child sexual exploitation and regularly train their associates to respond properly to suspected instances. ECPAT-USA developed a Request for Proposal (RFP) and contract language for corporate travel managers, the meetings industry and travel management companies available at www.ecpatusa.org/gbta.

GOVERNMENTS

1. Pass laws that require hotels to train their associates on child sexual exploitation, with consultation and resources from groups already working on the issue.

Many hotels are proactively training their associates. Those who exploit children seek out venues where they feel anonymous and will go unnoticed or unreported to the authorities, so it is important that there are no gaps in training. Unfortunately, this means that if one hotel trains and a trafficker leaves a property, they may go right to the hotel next door to exploit their victims. State governments must pass laws requiring *all* hotels to train their associates to recognize and appropriately respond to suspected instances of child sexual exploitation, as Connecticut did in 2016. Crucially, these laws must consider the work already being done by nonprofits, AHLA and the hotel industry to address this issue. They must include existing, vetted resources in the training requirements rather than duplicating existing efforts.

2. Pass transparency legislation that explicitly includes child sexual exploitation language.

Governments outside the United States, most notably in the UK with the Modern Slavery Act, have passed transparency legislation that requires companies to report on their efforts to combat human trafficking, including child labor.¹⁶ The United States introduced similar legislation called the Business Supply Chain Transparency on Trafficking and Slavery Act. This legislation, introduced in the U.S. House of Representatives in 2015, would require certain businesses to report annually on steps they had taken to address modern slavery and trafficking.¹⁷ ECPAT-USA works to ensure legislation includes explicit requirements for reporting on child sex trafficking, which is often overlooked. Additionally, transparency legislation cannot stop at targeting companies that provide goods (products) but must also require certain companies that provide services, such as hotels, to report.

3. Reach out to local hotels in their jurisdictions.

Governments can play a key role in stopping child sexual exploitation in their jurisdictions by directly engaging with local hotels. By reaching out to local hotels, governments can get a clear picture of what actions hotels in the area are already taking to combat child sexual exploitation, as well as what work still needs to be done and how governments can contribute. Florida's congressional delegation brought industry leaders to Washington D.C. in 2017 for a hearing to discuss how to best address trafficking in their state;¹⁸ governments must engage with industry leaders like this more widely.

4. Allocate funds for nonprofit organizations that are engaging in training.

Nonprofit organizations are leading the way in combating child sex trafficking by working with the private sector. By creating training materials and giving guidance about how to recognize and respond to a crime, nonprofits are fulfilling an important role that governments should be supporting. Governments must allocate funds to the organizations working in this area, who have expertise on and commitment to the issue.

5. Require that hotels contracted for events have policies and training on child sexual exploitation.

It is crucial that governments and hotel contractors alike state a common repudiation and zero tolerance policy of sexual exploitation of children. When governments contract hotels for events or other purposes, they must seek out hotels that have zero tolerance policies and training related to the sexual exploitation of children. If this is not already in place, the contract must require that hotels implement policies and training before the government function takes place.

6. Direct employees to use hotels that have policies and trainings on child sexual exploitation for official travel.

Hotels that are approved for government employees while on official travel must have clear policies against child sexual exploitation in place, and regular training for hospitality associates.

THE PUBLIC

1. Travel responsibly.

By staying at hotels that are trained to address the commercial sexual exploitation of children, travelers can feel good knowing that they are supporting businesses taking a stand against child sex trafficking. Additionally, the commercial sexual exploitation of children in hotels can put uninvolved guests at risk of violence, so choosing hotels that address the issue is not only the right thing to do, it is also safer. Travelers can find an updated list of hotels who have signed The Code and other steps to become a responsible traveler at www.ecpatusa.org/responsible-traveler and in Appendix A.

2. Encourage unbranded hotels to train using available resources.

ECPAT-USA's work focuses on large branded hotels and management companies. When ECPAT-USA engages with a major hotel chain, one brand partnership can lead to thousands of trained employees. Community groups are uniquely positioned to reach out to local, independent hotels and let them know about the sexual exploitation of children in hotels, and share quality, vetted resources for training. Resources can be found at <https://www.ahla.com/issues/human-trafficking>. There is also a small portion of hotels that are knowingly enabling sex trafficking, which must be dealt with by law enforcement organizations who can explore potentially closing these hotels with nuisance abatement laws.

APPENDIX A

Tourism Child-Protection Code of Conduct Hotel Brands and Hotel Management Company Members in the United States

Caribe Royale Orlando
Carlson Rezidor Hotel Group
Choice Hotels International
Hilton Worldwide
Hyatt Hotels Corporation
Inn at St. Mary's
Morris Inn
Real Hospitality Group
Sonesta
Vantage Hospitality Group, Inc.
Vision Hospitality Group, Inc.
Wyndham Worldwide Corporation

ENDNOTES

¹ Institute of Medicine; National Research Council, *Confronting Commercial Sexual Exploitation and Sex Trafficking of Minors in the United States*, The National Academies Press (2013), <https://www.nap.edu/catalog/18358/confronting-commercial-sexual-exploitation-and-sex-trafficking-of-minors-in-the-united-states>

² Hotel parent companies such as Hilton or Marriott operate multiple hotel chains under their brand. Hotel properties may be owned and operated by these parent companies, or they may be independently owned and operated franchises that exist under the parent company's brand name.

³ Under 18 U.S.C. § 1591, the United States government defines human trafficking as the recruitment, enticement, harboring, transportation, provision, obtaining, maintaining, advertising, patronizing, or soliciting of a person, through the use of force, fraud, or coercion with the goal of prostitution, pornography, violence/sexual exploitation, forced labor, involuntary servitude, debt bondage (with unfair wages), slavery/similar practices. If the exploited person is under the age of 18, force, fraud, or coercion does not need to be proven.

⁴ Ric Curtis, Karen Terry, Meredith Dank, Kirk Dombrowski, and Bilal Khan. *The Commercial Sexual Exploitation of Children in New York City, Volume One: The CSEC Population in New York City: Size, Characteristics, and Needs*, THE CENTER FOR COURT INNOVATION (Sept. 2008), <https://www.ncjrs.gov/pdffiles1/nij/grants/225083.pdf>

⁵ Jonathan Dienst, *Ex-Subway Spokesman Jared Fogle Paid for Sex With Minor at High-End NYC Hotels: Feds*, NBC New York, Aug. 19, 2015, <http://www.nbcnewyork.com/news/local/Jared-Fogle-Former-Subway-Spokesman-Sex-Minors-New-York-City-Hotel-Plead-Guilty-Child-Pornography-322282162.html>

⁶ In December 2016, Carlson was acquired by HNA Group and the company must recommit to remain a member of The Code.

⁷ Hotel Industry Responds to Human Trafficking Crisis with New Online Training Program, American Hotel and Lodging Educational Institute (2016), <https://www.ahlei.org/About/News-Room/Newsletters/>

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- ¹³ Ric Curtis, Karen Terry, Meredith Dank, Kirk Dombrowski, and Bilal Khan. *The Commercial Sexual Exploitation of Children in New York City, Volume One: The CSEC Population in New York City: Size, Characteristics, and Needs*, THE CENTER FOR COURT INNOVATION (Sept. 2008), <https://www.ncjrs.gov/pdffiles1/nij/grants/225083.pdf>
- ¹⁴ IHS Markit Economics, *Franchise Business Economic Outlook for 2017*. INTERNATIONAL FRANCHISE ASSOCIATION, http://franchise.org/sites/default/files/Franchise_Business_Outlook_Jan_2017.pdf
- ¹⁵ *Dreams Happen Here*, AMERICAN HOTEL AND LODGING ASSOCIATION, <https://www.ahla.com/dreams>
- ¹⁶ Modern Slavery Act 2015, s 54.
- ¹⁷ Business Supply Chain Transparency on Trafficking and Slavery Act of 2015, H.R.3226, 114th Cong. (2015-2016).
- ¹⁸ Cb3m3raldc0astmichelle, *Florida's congressional delegation holds hearing on human trafficking*, CB EMERALD COAST (June 28, 2017), <http://cbemeraldcoast.com/blog/2017/06/28/floridas-congressional-delegation-holds-hearing-on-human-trafficking/>

Protecting every child's basic
human right to grow up free
from the threat of sexual
exploitation and trafficking.



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