

Institution: University of West London		
Unit of Assessment: UoA 24 - Sport and Exercise Sciences, Leisure and Tourism		
Title of case study: The COMBAT Toolkit; Tackling Trafficking in Human Beings within the Hotel Sector		
Period when the underpinning research was undertaken: 2014-2016		
Details of staff conducting the underpinning research from the submitting unit:		
Name(s): Alexandros Paraskevas, PhD	Role(s) (e.g., job title): Professor in Strategic Risk Management	Period(s) employed by submitting HEI: From January 2014 to date
Period when the claimed impact occurred: 2016-2020		
Is this case study continued from a case study submitted in 2014? No		
1. Summary of the impact (indicative maximum 100 words)		
<p>The COMBAT research programme demonstrated for the first time the hotel sector's specific vulnerabilities to trafficking in human beings (THB). The research team proposed risk assessment techniques and mitigating strategies for the full range of THB risks in hotels and their supply chains, translating this into a Toolkit widely taken up in the sector and helping address this serious crime. The Toolkit was endorsed by the Institute of Hospitality (worldwide membership, 15,000) and underpinned the Shiva Foundation's Stop Slavery Blueprint (the only comprehensive hospitality anti-THB standard in UK). With the introduction of the UK Modern Slavery Act in 2015, the Toolkit has proven a valuable resource for hotel businesses training their staff and meeting their legal obligations. The Toolkit has enabled the Welsh Government to promote a consistent national approach to THB and has also been a foundation for the hospitality sector work of the Civil Service-led UK Modern Slavery Training Delivery Group.</p>		
2. Underpinning research (indicative maximum 500 words)		
<p>A consortium consisting of researchers from three universities (University of West London, Oxford Brookes University and Lapland University of Applied Sciences in Finland) and a charity (Ratiu Foundation for Democracy in Romania) was funded in 2013 by the EC's Directorate of Home Affairs to research the European hotel business environment and develop a training toolkit. While there have been numerous, commendable anti-THB initiatives in the hotel sector such as the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism, most of them focused on awareness and detection of signs for a limited range of THB types. None proposed specific action to combat THB at corporate, management, and operational level in hotels. This project - COMBAT THB - was the first ever academic research project on THB in the hotel sector that went beyond simple awareness-raising and proposed specific action and measures to combat THB. [Reference 1]</p> <p>During the two-year programme starting in October 2014 the research team led by UWL's Prof Alexandros Paraskevas as principal investigator (and main applicant at Oxford Brookes University before moving to UWL in 2014), conducted a research study which made several distinct contributions:</p>		
<ul style="list-style-type: none"> • An assessment of the EU THB landscape was produced in 2014 by bringing together reports from the Council of Europe's Group of Experts on Action against Trafficking in Human Beings (GRETA) and other sources (Interpol, Europol, Frontex, UNDOC). This resulted in a Google Earth map of the routes that traffickers typically use throughout Europe, which allowed hotel businesses to identify their proximity and potential vulnerability. [Reference 2 pp. 33-36] • Based on the Group of Experts GRETA's statistics and numerous secondary sources, the researchers found in 2014 that in the EU, on an annual basis, over 93,000 sex slaves and 4,500 labour slaves are exploited in hotels while 12,500 labour slaves are exploited in restaurants and bars. [Reference 3 pp. 33-37] 		

- Following primary research with a mix of in-depth interviews and surveys of over 140 hotel executives and managers in more than eight European countries, the research identified for the first time (research published in 2018) a list of 28 hotel sector vulnerabilities to THB. [Reference 4]
- The research showed that the sector is not only susceptible to THB for sexual and labour exploitation as commonly believed. With seven sector-specific case studies, it demonstrated other, often more complex forms of THB taking place within their operations and supply chains including maintenance and construction. Signs/red flags of such forms of THB were identified to be recognised by hotel professionals. Risk assessment techniques and mitigating strategies were proposed. [Reference 5; Reference 3 pp. 28-47]
- The researchers developed a 'Barriers Model' for the 'journeys' of trafficked victims through the front- and back-of-the-house hotel operations. Critical intervention points (nodes) in these 'journeys' were identified where the hotel professionals (guardians) could spot the THB signs/red flags. Anti-THB policies and standards were proposed by the researchers for hotels to deter the 'journey' and possibly rescue the victim. [Reference 5; Reference 6]

3. References to the research (indicative maximum of six references)

1. COMBAT Toolkit, available online for free download: <https://bit.ly/3eksUW9>; <https://bit.ly/2Ab8PTi>; <https://bit.ly/33Kh3hh>; <https://bit.ly/39G2peD>; <https://bit.ly/33Hbtwg>
2. Reference Guide Hotel Managers - <https://bit.ly/2TDPyAZ> .
3. Reference Guide Hotel staff - <https://bit.ly/2A5s7tw>
4. Paraskevas, A. and Brookes, M. (2018) "Human Trafficking in Hotels: An 'Invisible' Threat for a Vulnerable Industry". *International Journal of Contemporary Hospitality Management*, 30(3), 1996-2014. <https://doi.org/10.1108/IJCHM-04-2017-0213>
5. Paraskevas, A. and Brookes, M. (2018) "Nodes, Guardians and Signs: Raising Barriers to Human Trafficking in the Tourism Industry". *Tourism Management*, 67(2), 147–156. <https://doi.org/10.1016/j.tourman.2018.01.017>
6. Paraskevas, A. (2020) Human trafficking and modern slavery in Europe's hotels. In: C. Lashley (Ed) *Slavery and Liberation in hotels, restaurants and bars*. Oxford, UK: Routledge. ISBN 9780367424664

Grant Award: Oxford Brookes University (PI: Prof A Paraskevas); Combat measures against human trafficking in the tourist industry – COMBAT (HOME/2013/ISEC/AG/THB/4000005873); European Commission Directorate of Home Affairs; 294, 619 EUR; 1/09/14 to 31/08/16.

Quality statement: R4 and R5 were both published in peer-reviewed journals and have been submitted as outputs for assessment in REF 2021 in the University's UOA 24 submission.

4. Details of the impact (indicative maximum 750 words)

Trafficking in human beings (THB) is a term used interchangeably with modern slavery although, from a legal perspective, THB is one form of modern slavery. Despite the abolition of slavery in the 19th century, people continue to be enslaved today in large numbers. They are exploited in various ways in many different economic sectors, including hotels and restaurants. The most recent International Labour Organisation estimate of modern slavery victims globally is 40 million men, women, and children generating US\$150 billion in profits for their slave traders per year.

The lack of specific research and disjointed national legal frameworks and reporting systems on human trafficking across the world led the European Commission to fund sectoral studies to gain a clearer picture of this crime in Europe. The COMBAT study was funded with the aim to explore THB in the European hotel sector and to propose specific anti-THB strategies and policies for the businesses within the sector. When the project started in 2014, most national hoteliers' associations and their European body, HOTREC, did not accept that THB was a criminal activity taking place in the hotel sector. One of the striking findings of COMBAT was that annually across Europe, of the more than 1.1 million victims of human trafficking (2014 estimate), over 93,000 sex

slaves and 4,500 labour slaves were exploited in hotels and 12,500 labour slaves in restaurants and bars. [Reference 1]

The few hotel sector anti-THB initiatives which existed at the time of the study focused only on specific forms of THB, predominantly child sexual exploitation, and were limited to raising awareness and recognising signs of that type of THB. The COMBAT research identified not only the extent but also the sources of the sector's vulnerability to multiple types of THB. The study proposed risk assessment techniques for the full range of THB risks in hotels and action and reporting strategies to effectively safeguard both front- and back-of-house operations and supply chains. [Reference 2] The research findings were translated into hotel-specific actionable knowledge through the "COMBAT Toolkit" which covered a range of interventions, from THB awareness training and the development of anti-THB policies and procedures at hotel-level through to anti-THB strategy, governance, monitoring and reporting (internal and external) at corporate board level. With the introduction of the UK Modern Slavery Act in 2015, the toolkit proved to be a valuable resource for hotel businesses to meet their legal obligations. It was made freely available online through several websites [Reference 1] in June 2016 and by June 2020 its various components had been collectively downloaded 8,542 times.

Hotel Anti-THB Policies and Standards in the UK and the EU

The COMBAT research findings and toolkit were used by the Shiva Foundation, a UK-based charity with the aim of preventing human exploitation, to develop their Stop Slavery Blueprint. The Blueprint was launched in September 2018 and is the only hospitality industry-specific national standard for the UK endorsed by the British Hospitality Association (BHA), now UK Hospitality.

The Managing Director of the Shiva Foundation wrote to underline the importance of the COMBAT Toolkit, saying:

This research and set of tools have supported everything we have produced to aid the hotel industry in addressing modern slavery. The training we developed and rolled out within 89 hotels includes research findings and case studies from the toolkit; the online module we co-created with a training provider which has been completed nearly 17,000 times includes COMBAT tools; and we feature the toolkit as best practice on the resource hub for the Stop Slavery Hotel Industry Network. This is one of the most important pieces of anti-slavery related work for the hospitality industry. [Source 1]

The Shiva Foundation was recognised by the UK Director of Labour Market Enforcement as a "key stakeholder" in his strategy (United Kingdom Labour Market Enforcement Strategy 2018/19, p.32) and he identified the Blueprint as a positive example of how compliance can be better promoted across the hospitality sector (United Kingdom Labour Market Enforcement Strategy 2019/20, pp 137-8).

The Institute of Hospitality (IoH) examined and unconditionally endorsed the COMBAT Toolkit as a "learning product", reporting that the initiative was to be particularly commended as being timely and important in both creating awareness of the scale of the issue and providing hotels with a well-designed and well-considered toolkit for use across all staffing levels. Both the quality of the reference guide and the supporting learning materials were commended. The IoH said it was important for users to recognise the value and quality of the toolkit and its immediate application. The inclusion of a 'train the trainer' manual and the opportunity to modify and develop materials for specific use in-house provided flexibility was also to be commended. [Source 2]

The IoH used the COMBAT research for the development of their industry-wide Management Guide, *Combating Human Trafficking: Spotting Signals and Raising Barriers*. The Guide was authored by Paraskevas and the other members of the COMBAT research team and issued by the IoH to its 15,000 members worldwide. [Source 2]

The COMBAT research has enabled the Welsh Government's Anti-Slavery Leadership Group to shape their policy and strategy at local and national level across Wales. The Welsh Government

anti-slavery co-ordinator said the COMBAT Toolkit was used alongside their local initiatives to raise THB awareness in hotels and in other hospitality settings. These actions have contributed to ensuring a consistent anti-THB approach across Wales. [Source 3]

At a European level, COMBAT was used by the European Federation of Food Agricultural and Tourism Trade Unions (EFFAT) and the European Trade Association of Hotels, Restaurants and Cafes (HOTREC) to inform both organisations' anti-THB policies and it was disseminated to all their respective national hospitality association and trade union members in 30 countries across Europe as guidance for their national anti-THB strategies. [Source 4] It was also used as a basis for a Motion for a European Parliament resolution on training for hospitality workers on signs of human trafficking and sex slavery in November 2017. [Source 5]

Corporate Risk Management beyond the Hotel Sector

The COMBAT research has also prompted a leading risk management body, the Association of Insurance and Risk Managers in Commerce (AIRMIC), to highlight the importance of modern slavery as a business issue for senior corporate managers in all sectors.

The AIRMIC CEO, speaking alongside Paraskevas, told a FERMA (Federation of European Risk Management Associations) seminar in November 2018 that nearly 50 per cent of all UK firms that are required to comply with the Modern Slavery Act failed to do so and that too few firms had paid much attention to the Act.

AIRMIC used the COMBAT research findings and several elements from the toolkit to develop a guidance paper and workshops which were offered to 1,300 members in the UK and several thousands more across continental Europe via FERMA. [Source 6]

Hotel Anti-THB Training

The COMBAT research informed the development of anti-THB training delivered to staff at a wide range of national and international hotel groups. It was also used to develop hospitality-sector focused training by the UK government.

The former Senior Vice President of Global Risk Management for InterContinental Hotels Group (IHG) said that the COMBAT research findings "informed and inspired to a great extent the Group's move to develop a global antislavery policy and practice covering training in both hotel operations and the procurement services". He estimated that up to 4,000-5,000 managers and many thousands of employees at IHG received this training globally. The work "informed several campaigns of management action to reform and limit hotels owner ancillary business activities in the Middle East and China to stop harmful practices impinging on the hotels". [Source 6] The IHG 2019 Modern Slavery Statement (p.12) reported that by the end of 2019 "over 44,000 colleagues had completed our anti-human trafficking e-learning".

Shiva Hotels have been running modern slavery awareness training on an annual basis for all their c.350 staff members since 2016. Their Director of HR confirmed that the training was informed by the COMBAT research and toolkit and was supplemented by the COMBAT case studies and that "these case studies have been integral in bringing in real life examples which resonate with staff" [Source 7]. The Shiva Hotels 2019/20 Modern Slavery Statement notes their continued work with Paraskevas across their hotel portfolio to identify the systems which would increase the effectiveness of their anti-THB policies and procedures. [Source 8]

Hilton included COMBAT Toolkit material in their anti-THB training. In their 2019 Modern Slavery Statement, Hilton report to have trained 53,700 team members at 5,070 hotels on "Signs of Human Trafficking" and 2,800 team members on "Modern Slavery in Labour Sourcing". [Source 9]

The Civil Service-led UK Modern Slavery Training Delivery Group, comprising representatives from a range of government agencies and NGOs, produced a suite of materials aimed at all public sector workers to raise awareness of modern slavery. The Chair of the Group said the COMBAT Toolkit became "the foundation of the work strand within its Hospitality Subgroup". [Source 10]

The Vienna-based International Centre for Migration Policy Development (ICMPD) adopted the COMBAT Toolkit in a European Commission DG DEVCO funded 6-country project (Albania,

Azerbaijan, Bosnia-Herzegovina, Moldova, Pakistan, and Turkey) aimed at combating THB and organized crime. In its first stage, more than 50 hoteliers in Albania were trained by a team which included members of the COMBAT research project. The toolkit was initially translated by ICMPD into Albanian and then into the other languages. [Source 10]

Impact Recognition

Shiva Foundation's COMBAT-informed training has been referred to as best practice by the Independent Anti-Slavery Commissioner and the Local Government Association (LGA) [Source 1]. The COMBAT research also received the ABTA (Association of British Travel Agents) "Award For Excellence in Tourism and Globalisation Research" at the 2016 ATHE (Association for Tourism in Higher Education) Conference; and the STR (Smith Travel Research) Global/SHARE "Award for Industry Impact Research" in the 2017 CHME (Council for Hospitality Management Education) Conference.

5. Sources to corroborate the impact (indicative maximum of 10 references)

1. Managing Director, Shiva Foundation, letter 1/12/20. The Blueprint is available at: <https://www.shivafoundation.org.uk/our-work/stop-slavery-blueprint/> .
2. Institute of Hospitality: Management Guide; Endorsement 2017 and 2019.
3. Anti-Slavery Co-ordinator, Welsh Government Education & Public Services Group, letter 24/11/20.
4. European Federation of Food, Agriculture and Tourism Trade Unions, Social Dialogue in the European Hotel and Restaurant Sector, EFFAT-HOTREC Work Programme 2017-2018, point 6 of the agenda.
5. European Parliament: B8-0663/2017 Motion for a European Parliament resolution on training for hospitality workers on signs of human trafficking and sex slavery, 29/11/17.
6. See <https://www.airmic.com/news/guest-stories/why-risk-managers-need-pay-attention-modern-slavery-act> and letter from Chief Executive Officer, AIRMIC (and former Senior Vice President Global Risk Management at Intercontinental Hotels Group), 2/12/20.
7. Director of Human Resources, Shiva Hotels, letter 1/12/20.
8. Shiva Hotels Group LLP, *Modern Slavery Statement 2019/20*, p.4.
9. Hilton Hotels Worldwide Senior Manager Corporate Responsibility & Human Rights, email 23/11/17 and <https://cr.hilton.com/wp-content/uploads/2019/03/2019-Hilton-MSA-Statement.pdf> .
10. Chair of Civil Service-led UK Modern Slavery Training Delivery Group, letter 20/11/20.