# Creating Protocols for Casino Staff to Respond to Human Trafficking

**Tribal Victim Services Training and Technical Assistance Program (T-VSTTA)**January 2024

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### Agenda

- 1 | Creating Awareness & Responsibility
- 2 | Implementation Milestones
- 3 | Reporting
- 4 | Protocol Development
- 5 | Sample Protocol Content
- 6 | Q&A



#### **Our Team**





#### **About T-VSTTA**

Tribal Victim Services Training and Technical Assistance (T-VSTTA) is a resource for American Indian and Alaska Native (Al/AN) communities serving victims and survivors of crime. T-VSTTA's no-cost support helps grantees and potential grantees increase their capacity to walk alongside victims and survivors of crime in their healing journey.



## Getting Started: Taking the Initial Steps

Recognize the need for building awareness of human trafficking and responding to it.

Determine responsibilities for creating and overseeing response protocols.

- Security, training and senior management

Ensure protocols are victim-centered and trauma-informed.

Partner with and consult survivor leaders in developing response protocols.

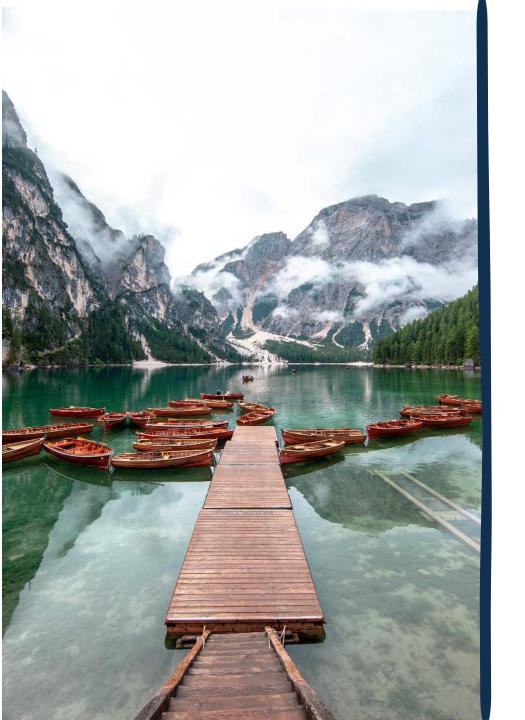
Total
commitment from
senior
management is
essential when
implementing
human trafficking
response
protocols.





# Everyone has a Role to Play

All casino staff from security to front desk to housekeeping to floor staff have a role to play in recognizing the potential signs and making a report.



# Response Protocol

Protocols or standard operating procedures document what to do, who to contact, and how to transfer information to the appropriate person or position.

#### **Education and Training is Key for Casino Staff**

#### **DESIGNATED STAFF**

Consider selecting a staff member to oversee the human trafficking response. This individual receives additional training on offering victim-centered, trauma-informed support when responding to suspicions of human trafficking within the casino.

#### **CREATE AWARENESS OF—**

- Human trafficking educational materials.
- Protocol launch date and timeline.
- Point of contact to receive all reports of suspected human trafficking.



#### What to include in the Response Protocol?

- Potential signs, or indicators, of human trafficking (i.e., what to look for).
- Casino contact to report a potential human trafficking situation.
- Criteria for notifying law enforcement and/or victim services, and how to handle the call.
- Safety precautions for victim and staff.
- Confidentiality agreement/protocol with local victim service providers, local law enforcement and the Tribal gaming commission.



#### What to include in the Response Protocol?

- Guidance on debriefing after a closed incident to gain insights and further refine the protocols.
- Partnerships with local victim services, law enforcement, and Tribal gaming commissions.
- Information on public awareness campaigns to build human trafficking knowledge.
- Opportunities to work with partners (e.g., victim service providers, law enforcement) on community awareness campaigns.



The designated individual trained on victim-centered, trauma-informed support responds to suspicions of human trafficking within the casino. This individual—

- Prioritizes the victim's safety, choice, and well-being in all interactions.
- Respects and supports the suspected victim's rights, dignity, self-determination, and choice regardless of whether they choose to report or receive support.
- Avoids activities that can potentially cause further harm, by limiting or not offering a victim choices in the recovery process.
- Offers to connect the victim with specialized service skills, resources, cultural competence, and trauma-informed responses.
- Contacts surveillance to ensure coverage and record keeping of victim interactions.



Depending on the situation and guided by their skills obtained in training, the designated individual will take one of the steps listed below.

A. If it is safe to do so, approach the suspected victim and begin a trust-building conversation/offer help.

#### Considerations for Adult/Child Victims

- If the suspected victim is a minor, follow mandated reporting guidelines which may require a separate set of protocols.
- If the suspected victim is an adult, follow best practices for a victim-centered approach in supporting victim's rights, dignity, autonomy and self-determination regardless of their decision to receive support or report to authorities.
- B. Wait for security to report additional information derived from surveillance activities. For example, surveilling a hotel room to determine if multiple persons are entering and leaving the room.
- **C.** Track additional indicators (e.g., individuals approaching customers at tables, in bars).



Once trafficking indicators are identified, it is safe, and the suspected adult victim agrees to receiving support, the designated individual—

- Escorts suspected adult victim to a designated secure.
- Documents/records the interaction between the designated individual and the suspected victim in a confidential manner that protects survivor privacy and safety.
- Contacts local victim services, law enforcement (consider jurisdiction) and the Tribal gaming commission and documents all suspicions, interventions and observations, and recommendations.
- Identified individual(s) finalize all reporting and make recommendations for casino to exclude traffickers from facilities, if the trafficker is a known individual.



Once trafficking incident is resolved, the designated individual—

- Archives any surveillance footage for future use, ensuring records are held confidentially prioritizing victim safety and privacy.
- Tracks the incident into a database and archives all documentation.
- Meets monthly with all internal stakeholders to capture best demonstrated practices and consider protocol refinements.
- Holds documents and records of survivor interactions in the strictest confidence; disclosure must be based on the survivor's informed-consent and follow relevant mandatory reporting laws for minors.



#### **Creating Partnerships to Meet Survivor Needs**

# A COLLABORATIVE RESPONSE

Human trafficking requires a coordinated and integrated response to support survivors. Casino staff can assist with identifying human trafficking and reporting it. Partnerships with local victim service providers can support survivors in accessing services during their healing journey.

## Survivors may seek services in these areas—

- Safety
- Medical
- Food
- Housing (i.e., immediate, short- and long-term)
- Clothing
- Transportation





Legal

Helping Crime Survivors Find Their Justice

Education



# We cannot do this work without survivors leading. They are the experts of their own lives.

OVC Human Trafficking Capacity Building Center



#### Help for Victims – National Native Helpline



#### **StrongHearts Native Helpline**

A safe, confidential and anonymous domestic, dating and sexual violence helpline for Native Americans and Alaska Natives offering culturally-appropriate support and advocacy.

Safe | Confidential | Anonymous | 24/7 Call or text 1-844-7NATIVE (762-8483) Chat online at strongheartshelpline.org



#### **Help for Victims – National Hotline**





24/7 • Toll free • Confidential • 200+ languages



#### **Toolkit and Education Resources**

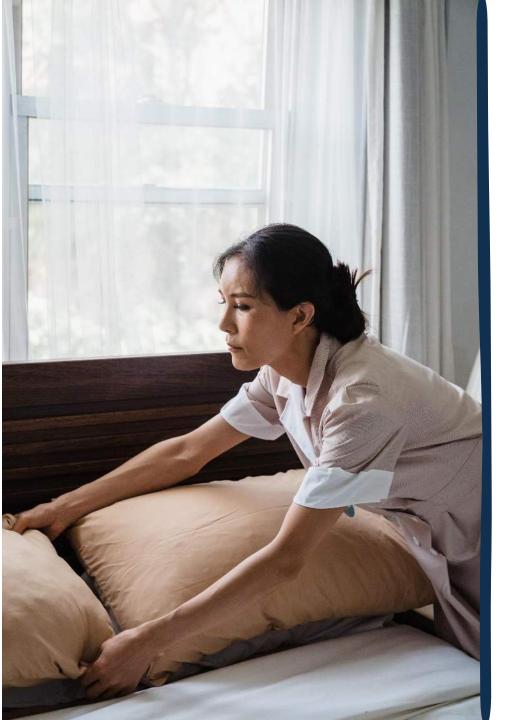
Title	Author	Description
Casinos Combatting Human Trafficking Toolkit	American Gaming Association	Toolkit created by a survivor-leader to educate and equip casino and bus industry employees on recognizing and reporting human trafficking.
Human Trafficking Response Guide for the Hospitality Industry	U.S. Department of Homeland Security	This guide educates hospitality industry professionals about human trafficking and its indicators to increase victim identification.
Human Trafficking Question and Answers	National Indian Gaming Commission	National Indian Gaming Commissions answers five questions on human trafficking about their efforts including authority, response, monitoring, coordination, and awareness.
On-Ramps, Intersections, and Exit Routes	Polaris Project	This report focuses on private companies' role in fighting human trafficking.



#### **Protocol and Policy Resources**

Title	Author	Description
Human Trafficking Protocol	Reclaim 611	Sample flow chart for identifying and responding to human trafficking.
Human Trafficking Response Protocols	HEAL Trafficking	This report focused on a health system response offers sample human trafficking response protocols on pages 34 to 43.
Sample Human Rights Policy Statement	Marriott International	Sample one-page policy statement about ethical business conduct, workplace policies, responsible sourcing, and commitment to human rights.
Sample Human Trafficking Prevention Policy	American Hotel and Lodging Association	Sample one-page human trafficking prevention policy with content on company and employee responsibilities and expectations.





# Activity

The purpose of this activity is to discuss each of the steps in the sample protocol. As you go through this activity, apply these steps to your experience thinking about how the people and departments in your casino can work together to identify and respond to human trafficking. All casino staff, in all levels, and in every department, have a role to play in combating human trafficking.

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