



ICAO



UNITED NATIONS  
**HUMAN RIGHTS**  
OFFICE OF THE HIGH COMMISSIONER

## Circular 362

# Guidelines for Combatting Trafficking in Persons in the Air Operator Supply Chain



Approved by and published under the authority of the Secretary General

INTERNATIONAL CIVIL AVIATION ORGANIZATION





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permission in writing from the International Civil Aviation Organization.

## **FOREWORD**

The International Civil Aviation Organization (ICAO) is fully committed to helping States and air operators ensure that traffickers of persons do not misuse air transport to facilitate their criminal activities. ICAO is equally committed to helping ensure that aviation as an economic sector is not preyed upon by individuals or organizations engaging in human trafficking.

Trafficking in persons has been found in every industry and in every corner of the world, and aviation is no exception. This circular focuses on providing clear steps for preventing trafficking in persons within air operator supply chains, in support of relevant national and international laws. It is also a reflection of ICAO's commitments to eradicate human trafficking and to promote full and productive employment and decent work for all, as described in the UN 2030 Agenda for Sustainable Development. We strongly encourage States and civil aviation authorities to advance progress towards this goal by providing this guidance to air operators and to all other air transport and air transport-related stakeholders.

As the United Nations specialized agency for civil aviation, ICAO is grateful for the expertise shared by the Office of the United Nations High Commissioner for Human Rights in the pursuit of this goal.

**Juan Carlos Salazar**  
**Secretary General**  
**International Civil Aviation Organization**

Trafficking in persons is a serious crime and human rights violation. It is our hope that these guidelines will assist States and air operators to take steps to prevent trafficking in persons within an air operator's supply chain, offering benchmarks to assess respect for human rights obligations that also align with the UN Guiding Principles on Business and Human Rights.

I extend my appreciation to the International Civil Aviation Organization (ICAO) for our longstanding partnership, which has led to the development of these guidelines, alongside previous tools to address trafficking in persons in the aviation industry. I also thank the Ad Hoc Working Group on Combatting Trafficking in Supply Chains for their commitment and dedication.



**Volker Türk**  
**High Commissioner for Human Rights**  
**Office of the United Nations High Commissioner for Human Rights**

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# CONTENTS

	<i>Page</i>
<b>Abbreviations.....</b>	<b>vii</b>
<b>Chapter 1. Introduction .....</b>	<b>1</b>
1.1 Background .....	1
1.2 Purpose .....	1
1.3 Scope .....	2
1.4 The importance of addressing trafficking in persons in the air operator supply chain .....	2
1.5 Definition of key terms and concepts.....	3
<b>Chapter 2. Standards .....</b>	<b>5</b>
2.1 International standards .....	5
2.2 Regional standards.....	6
2.3 Protect, respect and remedy framework.....	6
<b>Chapter 3. Air operator policies and procedures .....</b>	<b>8</b>
3.1 Role of the State civil aviation authority.....	8
3.2 Air operator policies.....	8
3.3 Air operator procedures.....	9
3.4 Grievance mechanisms .....	11
3.5 Supply chain resilience.....	11
<b>Chapter 4. Awareness and training.....</b>	<b>12</b>
4.1 Awareness.....	12
4.2 Training .....	13
4.3 Continuous awareness and training .....	15





## ABBREVIATIONS

CAA	Civil aviation authority
ESG	Environmental, social and governance
ICAO	International Civil Aviation Organization
ILO	International Labour Organization
OHCHR	Office of the United Nations High Commissioner for Human Rights

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# Chapter 1

## INTRODUCTION

### 1.1 BACKGROUND

1.1.1 Trafficking in persons refers to the process through which individuals are placed or maintained in an exploitative situation for economic gain. Trafficking is a lucrative, worldwide criminal activity and can occur within a State or may involve movement across international borders. Women, men and children are trafficked for a range of purposes including slavery-like practices; forced labour in factories, farms and private households; organ removal; sexual exploitation; and forced marriage. The crime impacts every sector and State, regardless of geographical location or a State's level of economic development.

1.1.2 Aviation is one of the modes of transportation used by traffickers. Each State and air operator (in other words, the person, organization or enterprise engaged in or offering to engage in an aircraft operation, such as an airline) should ensure that traffickers do not misuse the aviation sector to deny the freedom of others. The Office of the United Nations High Commissioner for Human Rights (OHCHR) and the International Civil Aviation Organization (ICAO), recognizing the important role aviation plays in combating trafficking in persons, worked in collaboration to develop the *Guidelines for Training Cabin Crew on Identifying and Responding to Trafficking in Persons* (Cir 352) and the *Guidelines for Reporting Trafficking in Persons by Flight and Cabin Crew* (Cir 357). These guidelines focus primarily on the role of air crew in identifying potential cases of trafficking in persons on board aircraft and reporting them to the relevant competent authorities.

1.1.3 The issue of trafficking in persons is not, however, limited to the movement of potential victims by air. Forced labour and other labour abuses may occur within air operator supply chains, including the manufacture and fulfilment of products and services. Examples of an air operator's suppliers may include catering services, baggage handling, the production of crew uniforms, construction materials for aircraft, or the cultivation and production of food and beverages served on board. States, and air operators under their purview, should implement measures to prevent trafficking in air operator supply chains by taking clear steps to ensure that trafficking in persons is not taking place in their supply chains.

### 1.2 PURPOSE

1.2.1 ICAO worked in collaboration with OHCHR to develop this circular, which is intended to assist States and air operators in preventing trafficking in persons in air operator supply chains, by providing clear steps to ensure due diligence and transparency in supply chain management.

1.2.2 This circular emphasizes the need for supply chain due diligence and voluntary commitments to fair labour practices, including responsible recruitment and adherence to existing laws by aviation sector organizations, as important measures to prevent trafficking in persons. Trafficking in persons has been found in supply chains in virtually every sector, worldwide. Addressing this issue requires internal government coordination and raising awareness among air operators regarding their responsibilities, the financial and reputational impact of engaging in such practices and legal obligations. To foster supply chain management and prevent trafficking, air operators should implement policies and procedures, as well as awareness campaigns and training programmes, related to this issue. Joint State and air operator efforts facilitate open communication and allow for analysis as well as for other information to emerge periodically.

1.2.3 The effective implementation of these guidelines will be a gradual process, requiring collaboration between States, air operators and their suppliers. Factors that may affect this implementation include the maturity of a State's oversight capabilities and the size and complexity of an air operator.

### **1.3 SCOPE**

1.3.1 The content and approach outlined in this circular are an acceptable, but not sole, means to manage air operator supply chain issues to prevent trafficking in persons. Air operators should consult with their State on specific requirements and comply with national laws and regulations, where applicable.

1.3.2 While this circular is applicable primarily to air operators, trafficking in persons involves multiple stakeholders. The concepts and processes presented in this circular are one part of a comprehensive process to combat trafficking in persons in aviation<sup>1</sup>. Expectations for due diligence in supply chains are expanding, with mandatory existing and imminent due diligence regulations that define supply chains in expansive terms, including down to the commodity level. Therefore, organizations, such as air operators, should also consider their connection to trafficking risk in the manufacturing of aircraft, food served on board, as well as the various equipment and materials they use in all elements of their business activities. Aviation stakeholders, including airport operators, should use the guidelines as a basis upon which to develop their own policies and procedures.

1.3.3 The content of this circular was developed through a process of consensus, with inputs from OHCHR and experts from States, air operators and non-profit organizations dealing with trafficking in persons and supply chain management. It was thereafter submitted for an extensive peer review to collect and consider comments from the aviation expert community. ICAO and OHCHR gratefully acknowledge the contributions received from the ICAO Ad Hoc Working Group on Combatting Trafficking in Supply Chains (AHWG-TSP).

### **1.4 THE IMPORTANCE OF ADDRESSING TRAFFICKING IN PERSONS IN THE AIR OPERATOR SUPPLY CHAIN**

1.4.1 States have an obligation under international human rights law to protect individuals against human rights abuses perpetrated by third parties, including business enterprises, within their territory and/or under their jurisdiction. States should clearly set out the expectation that all business enterprises domiciled in their territory and/or jurisdiction, including air operators, will respect human rights throughout their operations. Businesses should carry out due diligence to identify, prevent, mitigate and account for how they address adverse human rights impacts<sup>2</sup>. Due diligence should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communicating how impacts are addressed. It should also cover both enterprise activities and those linked through business relationships.

1.4.2 States should provide guidance and support to air operators regarding effective measures to identify, prevent, mitigate, and account for addressing the risks of trafficking in persons, including forced or compulsory labour in their operations, or in products, services, operations, and throughout their supply chains, that are necessary to maintain aviation sector operationality. Air operators often rely on suppliers to provide a multitude of products and services related to daily aviation activities. However, air operators may unknowingly contract suppliers that engage in trafficking in persons or recruit workers through fraudulent, unethical or other exploitative practices.

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<sup>1</sup> Source: [Doc 10171, Manual on a Comprehensive Strategy for Combating Human Trafficking in the Aviation Sector](#).

<sup>2</sup> An "adverse human rights impact" occurs when an action removes or reduces the ability of individuals to enjoy their human rights.

1.4.3 Air operators should exercise supply chain due diligence through direct action and the provision of remedies. Efforts should address the various layers of suppliers, including checking both direct and indirect suppliers (in other words, the suppliers of air operator suppliers). The highest levels of the air operator's management personnel should demonstrate support for initiatives related to this issue.

1.4.4 To prevent trafficking in persons within their supply chains, air operators should take steps to assess and mitigate risks of trafficking in persons relevant to the specific supply chain, provide remedies, monitor the effectiveness of such efforts, raise awareness and provide training to their employees.

1.4.5 Risks of trafficking in persons within an air operator's supply chain are dependent on a multitude of factors, including industry and commodity or service types, supply chain complexity, geographical spread and workforce composition. Air operators should carry out regular risk assessments to identify aspects of the supply chain that require further analysis. At times, risk assessments will vary for each air operator, but analyses should focus on risk factors within the supply chain. Examples of risk factors are presented in Chapter 3.

1.4.6 The process used to select and monitor suppliers can result in several benefits, including respecting labour rights, inclusive economic growth, supply chain resilience, ethical business practices and positive reputation. Ultimately, the process can prevent trafficking in persons and exploitation in the supply chains of air operators.

## **1.5 DEFINITION OF KEY TERMS AND CONCEPTS**

### **1.5.1 Trafficking in persons**

"Trafficking in persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. Although this is the definition of trafficking in persons provided in the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (Palermo Protocol), some States use different terms to refer to trafficking in persons, such as modern slavery, forced labour and slavery-like practices. For this circular, the use of the term trafficking in persons is meant to cover the conduct as defined in the Palermo Protocol regardless of the terms used for that conduct in different countries and regions.

### **1.5.2 Supply chain management**

A supply chain is a system of organizations, people, activities, information and resources involved in moving a good or service from the initial supplier to the final customer. Supply chain management involves planning and managing all activities involved in sourcing and procurement, conversion, as well as all logistics management activities to meet the customer's needs. It encompasses coordination and collaboration with suppliers, intermediaries, third-party service providers and customers.

### **1.5.3 Human rights due diligence (Protect, Respect and Remedy)**

Consistent with the United Nations Guiding Principles on Business and Human Rights, due diligence comprises a continuous management process that a reasonable and prudent organization needs to undertake to meet its responsibility to protect, respect human rights, and remedy the adverse human rights impacts of its own activities, as well as those that may be directly linked to its operations, products, or services through its business relationships.

### **1.5.4 Fair recruitment**

Fair recruitment can mean the recruitment carried out within the law, in line with international labour standards, with respect for human rights and protecting workers from abusive situations without discrimination.

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## Chapter 2

# STANDARDS

### 2.1 INTERNATIONAL STANDARDS

2.1.1 As stated in the United Nations Guiding Principles on Business and Human Rights, States have an obligation under international human rights law to protect against human rights abuses perpetrated by third parties, including business enterprises, within their territory and/or jurisdiction.

2.1.2 The international framework comprises a wide variety of human rights conventions, labour rights conventions and trafficking in persons conventions. The international framework also includes recommended principles. These conventions and principles are directly aimed at businesses, especially the Protect, Respect and Remedy Framework in the United Nations Guiding Principles on Business and Human Rights (refer to 2.3). At the time of publishing, these guidelines, relevant conventions and principles include, but are not limited to, the following:

a) Human rights conventions:

- 1) [International Covenant on Civil and Political Rights](#)
- 2) [Convention on the Rights of the Child](#)
- 3) [Slavery Convention](#)

b) Labour rights conventions:

- 1) [International Labour Organization \(ILO\) Private Employment Agencies Convention](#)
- 2) [ILO Worst Forms of Child Labour Convention](#)
- 3) [ILO Forced Labour Convention](#)
- 4) [ILO Protocol of 2014 to the Forced Labour Convention](#)
- 5) [Abolition of Forced Labour Convention](#)

c) Recommended principles:

- 1) [United Nations Recommended Principles and Guidelines on Human Rights and Human Trafficking](#)
- 2) [United Nations Guiding Principles on Business and Human Rights](#)
- 3) [ILO Declaration on Fundamental Principles and Rights at Work](#)
- 4) [ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs](#)

## 2.2 REGIONAL STANDARDS

2.2.1 Several regional bodies have based their legislation on international Human Rights conventions. Regional treaties reinforce the application of international law in the respective region but also adapt the use of the international instruments to the specificities of a given region. For example, the Council of Europe Convention on Action against Trafficking in Human Beings is closely linked to the European Convention on Human Rights and to the institution of the European Court of Human Rights.

2.2.2 This section presents existing regional standards to protect against human rights violations and abuses, including trafficking in persons. Some regions are not presented in this section, since at the time of publishing these guidelines, no such standards exist for those regions.

2.2.3 Many regional organizations, such as the Council of Europe, the European Union, the Organization of American States, the African Union, the Association of Southeast Asian Nations, and the Organization for Security and Co-operation in Europe (OSCE) Office for Democratic Institutions and Human Rights, all have already expressed support for the due diligence frameworks on business and human rights, and have adopted strategies on corporate social responsibility, based on the United Nations Guiding Principles on Business and Human Rights. At the time of publishing these guidelines, regional mechanisms include, but are not limited to:

- a) [the African Charter on Human and Peoples' Rights](#)
- b) [the European Union Charter of Fundamental Rights](#)
- c) [the Inter-American System for Human Rights](#)
- d) [the Association of Southeast Asian Nations](#)
- e) [OSCE Office for Democratic Institutions and Human Rights](#)
- f) [Organisation for Economic Co-operation and Development \(OECD\) Due Diligence Guidance for Responsible Business Conduct](#)

## 2.3 PROTECT, RESPECT AND REMEDY FRAMEWORK

2.3.1 States and businesses have complementary roles in implementing the “Protect, Respect and Remedy Framework”, through developing rules and processes, based on the United Nations Guiding Principles on Business and Human Rights.

2.3.2 The Protect, Respect and Remedy Framework lays duties on States (regulators) and responsibilities on businesses (air operators). States have a duty to protect human rights in the context of business operations, by setting the standards and rules for businesses to operate within, aimed at preventing, investigating, punishing, and providing access to remedy for adverse human rights impacts.



**Table 2-1. The Protect, Respect and Remedy Framework**

<i>Framework aspect</i>	<i>Specifics</i>
Protect	States have a duty to protect human rights which could include defining clear parameters for businesses (including air operators) on how to set up policies.
Respect	Businesses have a responsibility to respect human rights through identifying the negative human rights impact of their operations by adopting policies and procedures to address this impact. They should also undertake continuous due diligence to identify and prevent as well as mitigate adverse human rights impacts.
Remedy	Remedies should be provided to those affected by adverse human rights impact. States are expected to take all necessary steps to ensure that those affected by business-related adverse human rights impacts have access to effective remedies. Such remedies could include judicial and non-judicial mechanisms. Businesses should establish or participate in effective grievance mechanisms.

2.3.3 To implement the Protect, Respect and Remedy Framework, several steps can be taken, such as adopting policies related to preventing trafficking in persons and other forms of exploitation; adopting a code of conduct specific to the aviation industry; and adopting auditing protocols to undertake meaningful evaluations. More implementation practices may be drawn from other industries that have been successful, such as developing a common label for the industry and making voluntary commitments, including evaluation, auditing and reporting.

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## Chapter 3

### AIR OPERATOR POLICIES AND PROCEDURES

#### 3.1 ROLE OF THE STATE CIVIL AVIATION AUTHORITY

The State Civil Aviation Authority (CAA) should require that each air operator develop policies, procedures, training, and guidance for its employees to raise awareness on trafficking in persons issues in the supply and value chains. Appropriate responses to such events should also be developed. The CAA should use the content of this circular as the basis for training programmes for management and procurement teams, operational areas and other aviation personnel. The CAA is a State entity that should comply with all national laws and regulations, including criminal and transparency legislations that address the trafficking in persons.

#### 3.2 AIR OPERATOR POLICIES

3.2.1 Each air operator should develop a set of dedicated policies, procedures and reporting protocols to address obligations and risks in relation to their supply and value chains. Policies should recognize the key role that an air operator plays in this area. These policies should ensure that the air operator communicates its commitment to ethical standards as set out in this guidance, and elsewhere, and that there is clear guidance on the actions required to ensure compliance, including how complaints and issues can be raised and what steps the air operator will take in that event to remedy the situation. The policies should be publicly accessible and should be brought to the attention of suppliers and via suppliers, to their own supply chains. Suppliers should be required to adhere to such policies and to ensure that these policies are mirrored within their own supply chains. These policies should be brought into practice within the air operator's organization and its supply chain through information sharing and dissemination to the relevant departments, regular communication and training. The air operator should periodically review risks and mitigations and update the relevant policies accordingly.

3.2.2 It is likely that specific policies on the management of supply and value chains will overlap with the air operator's policies on environmental, social and governance (ESG) issues more widely, including codes of conduct (and supplier codes of conduct), human rights, safeguarding, and ESG policies. Where such policies exist, the air operator should review the content and ensure that it is consistent with their obligations to ensure ethical supply and value chains.

3.2.3 The aviation industry can be used for unethical practices in relation to the supply and value chains of other organizations. The aviation industry is one of the primary modes of transportation used by traffickers, making it likely for airline personnel to encounter victims or perpetrators. The air operator's policies should contain appropriate safeguards and mitigations to address these risks, as recommended in the *Guidelines for Training Cabin Crew on Identifying and Responding to Trafficking in Persons* (Cir 352) and the *Guidelines for Reporting Trafficking in Persons by Flight and Cabin Crew* (Cir 357). The air operator should also incorporate these aspects into its training programmes (refer to Chapter 4).

3.2.4 Policies should recognize the need for transparency in this area, to ensure that the principles on which the air operator addresses trafficking in persons issues are accessible, and that, where risks are identified that may affect other parts of the industry, these can be addressed in an appropriate manner. The successful implementation of such policies will inevitably include examples where action had to be taken to address and mitigate risks, which in turn could drive higher levels of transparency, compliance and standards in this area.

3.2.5 Where appropriate, policies should recognize the need for cooperation and collaboration with public authorities, including law enforcement agencies.

### 3.2.6 Supplier code of conduct

The air operator should develop a supplier code of conduct to document the standards for providers in its supply chain. This code of conduct enables the air operator to ensure that its suppliers, as well as its suppliers' suppliers, share the same values regarding business ethics and commitment to human rights protection, labour standards, health and safety, environmental protection and supply chain resilience. The air operator should include, among other topics in its supplier code of conduct, the issue of combatting trafficking in persons. The code of conduct should be shared on a regular basis with suppliers, to ensure they have the most recent version. There should be a contractual requirement for the supplier to comply with that code of conduct, as well as mechanisms to monitor compliance. The air operator should also make this code of conduct publicly available (for example, by posting it on its website).

## 3.3 AIR OPERATOR PROCEDURES

3.3.1 The air operator should understand and map out the full extent of its supply chain, including reference to industry type and geographic scope. This will extend beyond the first-tier supply chain and should, where possible, extend to the supply and value chains of those entities providing services indirectly to the air operator. The air operator should have systems in place to ensure that this information is updated periodically.

3.3.2 The air operator should ensure that suppliers are aware of its anti-trafficking in persons policies and principles, as well as the processes that it will apply to monitor and address compliance. The air operator should require that suppliers adhere to a supplier code of conduct, as a condition of the service contract. The air operator should not solely rely on contractual provisions to ensure compliance. Any contractual commitments should be supplemented with further monitoring (such as audits) and updated periodically. A full understanding of the supply chain allows the air operator to carry out a full risk assessment of the supply chain and to consider where best to allocate its resources for further supply chain monitoring to prevent trafficking in persons.

3.3.3 Supply chain monitoring can take different forms. In some cases, a desk-based assessment that involves collating information about a supplier and reviewing open-source data (whether carried out by the air operator or a third party agency) will give the air operator an indication of risk factors related to trafficking in persons. Where this assessment is conducted by a third party, it is important to check that the information that assessments are based on is up-to-date and that the third party provider is reputable. In some cases, a further audit may be more appropriate than a desk-based assessment or a site visit (announced or unannounced).

3.3.4 The air operator should ensure that it has adequate resources to carry out risk assessments and that teams who engage in this activity have sufficient support, autonomy, information, and training to carry out their roles. An assessment should consider relevant risk factors, and the basis on which risk assessments are carried out should be clearly documented. This could take the form of a heat map (a means to present data using colours to depict values in a dataset, which is useful to identify hotspots, risk areas or trends) and targeted audits in areas where more of the risk factors are evident. Examples of factors to take into consideration in determining risk include:

- a) State risk factors (for example, does it abide by international standards? Is there effective rule of law and adequate redress and access to labour enforcement measures? Is there political or security instability? Are suppliers legally required to take action and report on issues related to trafficking in persons?);

- b) International Labour Organization (ILO) country profiles that include indicators of child and forced labour;
- c) risk factors involving the social and political landscape within a State or region, including the role of trade unions and worker representation in collective bargaining and representation of employees;
- d) the length, stability, transparency and complexity of supply chains, including services provided through outsourced arrangements;
- e) a supply chain that includes high risk industries such as travel, cleaning, security, uniforms, catering and onboard products, and regions that have a preponderance of such industries;
- f) information on trends, risks and hot spots from other companies, agencies and authorities, including indicators of conflict, corruption and organized crime;
- g) working conditions risk factors, including indicators of temporary, casual, seasonal or agency labour and recruitment processes that lack transparency;
- h) working conditions that highlight health and safety issues and concerns, including excessive working hours and inadequate rest breaks;
- i) migration and other vulnerable worker risk factors (for example, the presence of a large number of migrant workers, asylum seekers or those with refugee status, legal status irregularities, and social or personal circumstances that restrict their ability to change employers, move within the host State, or leave the host State without the permission of their employer); and
- j) significant recruitment and debt risk factors, including but not limited to:
  - 1) Are workers paid without delay?
  - 2) Are workers paid below local minimum wage rates?
  - 3) Are wages being withheld to pay debts the worker has incurred?
  - 4) Is there clear evidence that the employer pays the cost of recruitment?
  - 5) Have workers been recruited with deception or other abusive or fraudulent means, including being subject to recruitment fees and associated costs?
  - 6) Have the identity and/or residency documents of the worker been withheld during the recruitment process or during employment?
  - 7) Does a supplier withhold information or lack transparency about its workforce?

3.3.5 It is helpful for the air operator to set out clear plans to remedy any issues that arise, where it is appropriate to do so. This could include guidance and recommendations for suppliers, or more direct improvement plans tailored to the specific circumstances. In more serious cases, it may involve suspending or withdrawing from a supplier or reporting the matter to law enforcement authorities.

### 3.4 GRIEVANCE MECHANISMS

3.4.1 Grievance mechanisms are a way for workers and communities to raise issues, complaints and concerns. Robust, transparent and gender-sensitive grievance mechanisms are a vital tool to tackle trafficking in persons, discrimination, and inequality for workers in global supply chains. If trafficking in persons is found, a specific team (within the appropriate department, typically the compliance department, or other centralized entity designated by the air operator) should investigate the issue, consider what appropriate steps should be taken, and verify that steps are taken to ensure the victim has the support and information required. This team should have full independence to address the issue. Any investigation and follow-up action should involve a consideration of cultural and local factors, risks and sensitivities and any relevant government and/or civil society-backed support mechanisms that victims of trafficking in persons can access.

3.4.2 First, the team responsible carries out an assessment of the allegations or concerns to ensure that there is sufficient information to understand the exploitation, if discovered, and remedy it. At this stage, any evidence supporting the allegations must be captured, preferably using an independent third party. If the assessment establishes concerns of unlawful behaviour or if the urgency of the situation requires, the relevant authorities should be informed from the outset. The air operator should take immediate steps to correct the situation for the worker, which should be tailored to their individual circumstances. This could include working with local authorities and competent local organizations to provide assistance. The air operator should decide and document how the outcomes of any investigation will be communicated, bearing in mind the need to protect victims. It should ensure that the remediation procedure complies with any laws and regulations that apply, including those regarding international labour and human rights, and is communicated with all workers on site.

3.4.3 If the investigation finds concerns regarding trafficking in the air operator's supply chain, it should consider the best course of action to address the issue with the specific supplier. The causes and severity of the issue(s) as well as any remediation policies that the air operator has established should be considered. The supplier should be committed to correcting violations and preventing them from recurring. Corrective actions should also consider what is best for affected workers. The air operator should keep all processes and policies, whether to identify, prevent and address trafficking in persons or the remediation process, under regular evaluation and review.

3.4.4 The air operator should keep records of the code of conduct that suppliers have agreed to and the training programme content for suppliers and other stakeholders. For every incident of trafficking in persons related to the supply chain, the air operator should maintain a record of all measures and steps taken to remedy the situation. In addition, the air operator should consider sharing information within industry (including with other air operators), to identify common issues and monitor trends.

### 3.5 SUPPLY CHAIN RESILIENCE

Import bans from some States, natural disasters, armed conflicts or other disruptions can affect supply chain resilience. When reacting to such a disruption and exploring alternative supply chains, the air operator should not lose sight of the risk of trafficking in persons in its selection process. Even in cases where the air operator chooses to continue using the same supplier in the short term (to avoid business disruption), the air operator should still fully assess the risks of relying on a supplier that does not take adequate measures to protect against trafficking in persons. The air operator should also develop a longer-term plan to either rectify the supply chain issue or locate alternative sources.

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## Chapter 4

### AWARENESS AND TRAINING

#### 4.1 AWARENESS

4.1.1 Most people routinely go about their jobs focused on their scopes of work and are usually not encouraged or trained to go outside those boundaries to call out practices that they find suspicious, such as those associated with trafficking in persons. This is why it is important to raise awareness of trafficking in persons among the wide variety of personnel in the aviation sector.

4.1.2 Trafficking in persons thrives when multiple people do not recognize it or do not take proactive steps to call out suspicions, often because they do not know where and how to report, or assume they are not qualified to do so. For instance, a person in a cleaning crew at an airport might assume a security official will notice and approach someone who seems suspicious, so they keep their concerns to themselves. Someone tasked with purchasing supplies may be expected to hold down costs and not raise concerns about the labour conditions or hiring practices of the supplier. Passengers are usually focused on getting to their destination and may be concerned that raising suspicions might put themselves in jeopardy or delay their journey. Awareness raising efforts need to focus on helping people see where and how they may encounter trafficking in persons, while also helping them overcome any reservations they might have about acting upon a suspicion.

4.1.3 In aviation, awareness needs to be raised among different groups, such as cabin crew members, ticket-counter agents, gate agents, and other airport personnel, procurement agents, facilities managers, civil aviation authority (CAA) inspectors, ground transportation operators, catering services, fuel providers, concessionaires, and passengers. Furthermore, organizations (including air operators, and others such as airport operators) should implement routine, continual awareness campaigns and public awareness programmes to ensure that new employees are knowledgeable and that awareness campaigns, policies and procedures evolve as needed for maximum effectiveness. These efforts address broader trafficking in persons compliance issues but also complement any specific activities that air operators are taking in relation to their supply chains.

4.1.4 The nature of awareness raising efforts will differ significantly depending on the group targeted. For instance, passengers moving through an airport or on an aircraft should be made aware of who might be vulnerable to trafficking, as well as the ways that both victims and perpetrators may behave. The same way a passenger is taught to spot and act upon security suspicions, they should be made aware of situations at risk for trafficking in persons and where and how they should report any concerns. For those who work at the airport, such as the ground crew of an air operator, awareness raising efforts should go deeper than those for a passenger, as the employee will be more likely to encounter trafficking by virtue of encountering thousands of travellers. Employees need more clarity about their specific responsibilities in relation to their job to act on and report suspicions, because their employment at the airport obliges them to be more proactive compared to a transient passenger rushing through the airport. For those who are connected through their job in one way or another with vendors or suppliers (for example, food industry, cleaning services) who may be directly or indirectly associated with trafficking in persons, the awareness raising efforts will need to be focused on forms of trafficking in persons linked to labour exploitation as manifested in a wide variety of employment settings, including those seemingly far away in terms of layers of value chains and physical distance. Awareness of how certain common business practices, such as outsourcing labour recruitment and hiring, exacerbate trafficking risk should be presented to employees in a way that captures their attention and shows a link to their place in the value chain. Furthermore, awareness should focus on how their specific role and responsibilities include understanding, spotting, and taking appropriate action if they observe suspicious activity. Overcoming the sense that it is not part of an employee's job to take appropriate action, consistent with all applicable laws, when suspicious activity is observed, is a key goal in awareness raising and training efforts.

## **4.2 TRAINING**

### **4.2.1 General**

Once awareness is raised, training efforts should focus on helping employees determine the appropriate response to their suspicions and concerns. This should go beyond simply reporting suspicions to include what actions are appropriate to their role or position, including steps to investigate possible links to trafficking in persons, how to mitigate risk, how to remedy harm and how to prevent reoccurrence. These efforts should be tailored to the specific role and responsibilities of the employee and where they fit in the hierarchy of their organization. Employees should be required to undertake continuing and regular training to learn how to act more effectively and sustainably on issues that are complex and challenging to change.

### **4.2.2 Training content**

4.2.2.1 Training content should set a strong foundation in what forms of trafficking exist and how they tend to manifest variously in different sectors, regions, population groups, etc. Training should help employees understand what constitutes trafficking and how to respond appropriately to suspected cases of trafficking in persons.

4.2.2.2 Training should progress to include specific best practices on supply chain accountability and anti-trafficking efforts, tailored to the type of employee and what sort of authority they can exercise within the organization. For instance, for the air operator, a cabin crew member will have a different role than the person responsible for hiring catering suppliers and cleaning services. Those who work to procure other services and products for the air operator outside the airport environment will need training appropriate to the States and sectors from which they procure.

4.2.2.3 Training programmes should be designed with the employment lifecycle of employees in mind. Employees taking on new positions will have different training needs to those of someone in a position for a long period, who may need a refresher course or training that builds skills to be more effective and ambitious in anti-trafficking efforts. Similarly, course content should include both general and more role-specific information in alignment with principles of adult learning theory.

4.2.2.4 Typical courses for management personnel include, but are not limited to:

- a) how to assess risk of both labour and sex trafficking;
- b) how to prioritize risk;
- c) how to determine approaches to change management within the organization and within supplier companies;
- d) how to gather relevant data and intelligence on risk;
- e) how to evaluate and correct the organization anti-trafficking efforts
- f) how to publicly report risks of trafficking in persons relevant to the specific supply chain;
- g) how to meaningfully engage with subject matter experts;
- h) how to approach cooperation and collaboration with industry peers to affect change; and
- i) how to approach remedial activities when harm has been uncovered.

Employees should be encouraged from the start of the process to articulate their own training needs on top of those cited as examples.

4.2.2.5 Multiple forms of training should be considered to meet various learning styles and to encourage greater coverage. For instance, training for all employees could be delivered virtually in an asynchronized fashion for employees to take courses as convenient and with less cost. For personnel with specific roles, capacity-building workshops are more suitable. For example, when training procurement managers on how to engage with suppliers, an in-person session with hands-on exercises facilitated by change management and subject matter experts would be best.

4.2.2.6 There are several considerations and best practices for the air operator when developing effective training programmes. These include, but are not limited to:

- a) ensuring adherence to established international, national and sub-national (as appropriate) definitions of trafficking in persons;
- b) incorporating trauma-informed and victim-centred language and imagery that supports potential victim's rights, dignity, autonomy and self-determination;
- c) emphasizing downstream risk factors that increase vulnerability to trafficking in persons; avoid common misconceptions and sensationalism; and provide behaviour-based indicators within the context of sex and labour trafficking situations for personnel to be vigilant;
- d) providing role-specific case scenarios (or illustrative examples), for learners to apply the knowledge, skills and attitudes imparted by the training; and
- e) consider pairing with other training programmes on anti-discrimination, sensitivity and customer experience; consider the local context when developing training content, partnerships, establishing policies and procedures for reporting (as outlined in Annex 9 – *Facilitation*) and tailor messaging to people in positions of assistance.

#### **4.2.3 Training for suppliers**

As the air operator determines how to identify, mitigate and prevent trafficking in persons in its operations and supply and value chains, it should communicate its expectations to suppliers. The air operator should establish clear, consistent and robust expectations to incentivize its suppliers to prevent and respond to trafficking in persons.

#### **4.2.4 Training for other stakeholders**

4.2.4.1 CAAs have several interactions with, and leverage over, how air operators and other organizations within the aviation sector perceive their roles and responsibilities on various issues. CAA personnel of various roles (including inspectors) should receive both awareness and capability-building training so that they can use their unique positions to drive change among all stakeholders.

4.2.4.2 In a public space like an airport, awareness campaigns targeting transient passengers can also reinforce messages for those employees who will see them daily.

4.2.4.3 Aviation is multicultural. Therefore, training programmes should be made available in multiple languages and formats to facilitate implementation. Organizations should also seek out and collaborate with other sectoral bodies, private sector associations, civil society, union groups and survivor-led organizations to learn from and build on their training and capacity-building efforts. All stakeholders around the world and from all business sectors are facing the challenge of fighting trafficking in persons and can learn from each other.



### **4.3 CONTINUOUS AWARENESS AND TRAINING**

Building dynamic training programmes is essential to keeping up with changes in how trafficking in persons takes place and also in how it is combatted. Refresher training can help employees remember how and why they should focus on trafficking from their perspective. Virtual training sessions can be especially useful in reaching more people and enabling employees to develop additional skills and knowledge at their own pace. Employees should be encouraged to explore and deepen their expertise and to take up potential leadership positions on this issue within their institution or on a wider scope.

**— END —**





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