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**ECPAT-USA Input to the White House National Action Plan on
Responsible Business Conduct
following the national consultation convened by the US Government
on December 15, 2014 at NYU Stern School of Business**

ECPAT-USA congratulates the US Government for undertaking the development of a NAP in the context of implementing the UN Guiding Principles on Business and Human Rights. ECPAT-USA believes it is a crucial first step in mobilizing the business sector to respect and protect human rights globally.

ECPAT-USA (End Child Prostitution, Pornography and Trafficking-USA) founded in 1991, is a 501(c)3 organization incorporated in New York State and a national leader in the movement to combat child sex trafficking and exploitation. ECPAT defines children as people under 18 years old, conforming with the U.N. Convention on the Rights of the Child and is the American affiliate of the international ECPAT network (www.ecpat.net) represented in 78 countries, working to eliminate the commercial sexual exploitation of children.

ECPAT-USA focuses its work in three primary ways: 1. ECPAT-USA advocates for federal and state legislation that prevents exploitation, protects children, and guarantees that any child who is subjected to sexual slavery or sex trafficking will not be prosecuted in the courts for prostitution; 2. ECPAT-USA promotes corporate responsibility with a strong focus on the tourism sector. 3. ECPAT-USA educates first responders and ordinary citizens about this issue so that they can identify victims and join us in the fight to better protect children.

With over twenty years experience advocating for child rights, ECPAT-USA observed the increasing role that the business sector plays, voluntarily or inadvertently, on multiple child rights violations. Children's inherent vulnerability to trafficking for sexual exploitation, labor, exploitation through pornography and sexual violence make them prime targets for abuse. Based on our long standing experience engaging companies in responsible practices, ECPAT-USA believes that businesses are in a critical strategic position to insure that child rights are respected and protected.

Following our participation in the first consultation on the White House National Action Plan (NAP) on Responsible Business Conduct held on December 15, 2014 at the NYU Stern School of Business, ECPAT-USA is pleased to submit for your further consideration our input towards the further development of this initiative.

Our extensive experience working the travel and tourism industry to prevent and protect children from sexual exploitation and trafficking resulted in the development of comprehensive tools in conjunction with our private sector partners.

ECPAT-USA believes private companies work best when provided with a structure for their work to protect children, therefore, ECPAT-USA recommends that travel companies adopt the internationally recognized Tourism Child-Protection Code of Conduct (TheCode.org). The Code is a set of six voluntary broad guidelines companies implement that help them put in place policies, training, and programs to protect children. The steps are as follows: 1. To establish a policy and procedures against sexual exploitation of children. 2. To train employees on children's rights, on the prevention of sexual exploitation and how to report suspected cases. 3. To include a clause in contracts throughout the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children. 4. To provide information to travelers on children's rights, the prevention of sexual exploitation of children and how to report suspected cases. 5. To support, collaborate and engage stakeholders in the prevention of sexual exploitation of children. 6. To report annually on their implementation of Code related activities.

Companies that join The Code must adopt all 5 guidelines and report on their implementation each year. Members develop action plans for implementing The Code based on their corporate structure and culture. Members in the United States work with ECPAT-USA as the Local Code Representative to ensure that their efforts are regionally relevant.

As of the end of 2014, there are 39 US members to The Code, a 30% growth increase from 2013. We found that major US brands are genuinely engaged in fighting child sex trafficking once they receive expert guidance to develop their plans. Current globally operating US members of The Code are Carlson Companies, Delta Air Lines, Sabre, Wyndham Worldwide, Vantage Hospitality Inc., Hilton Worldwide as well as many international business associations such as the International Gay & Lesbian Travel Association and the Association of Corporate Travel Executive. ECPAT-USA anticipates that at least one major global hotel chain and one global airline will join in 2015.

A particularly outstanding member is Carlson Companies, which owns Radisson, Park Plaza, Park Inn by Radisson, Country Inns & Suites by Carlson, and Hotel Missoni. In 2004, Carlson Companies was the first major hotel chain in the United States to join The Code, becoming a major anti-trafficking leader in the hospitality industry. Over the last decade, they continued to advocate for child protection by engaging their peer businesses to discuss the issue and encouraging others to join the cause. Carlson has been highlighted in several U.S State Department Trafficking in Persons reports for their efforts including partnering with ECPAT-USA to develop training for staff and sharing material across the hospitality industry. In 2013, Carlson received the inaugural Award for Extraordinary Efforts to Combat Trafficking in Persons.

Another strong partner is Sabre, a global distributing system for the travel and tourism industry. When Sabre signed The Code, they launched Passport to Freedom, their signature corporate responsibility program to help fight human trafficking and provide support for victims and survivors. Sabre works to raise awareness about the issue to the industry and general public as well as advocates for legislative change. They also facilitate trafficking visa (T-Visa) certification for local victims of international trafficking and launched a scholarship program for survivors of human trafficking who may be interested in working in the travel industry.

Training on human trafficking is a critical need for future generations of business leaders. To support our efforts engaging the hospitality industry in recognizing and responding to instances of child sex trafficking, ECPAT-USA co-launched with the American Hotel and Lodging Association's Educational Institute (AH&LA EI) the first nationally recognized e-learning module for the hospitality industry. The e-learning module has been widely distributed online and through webinars and can be licensed by hotels in the United States and around the world.

ECPAT-USA also found that major corporations that book extensive travel, events, and meetings around the world can influence travel suppliers. Their business is important to hotels and airlines, thus ECPAT-USA recommends that all major companies include language in their travel contracts requesting that suppliers develop policies, training, and join The Code. This has been extremely successful in raising awareness about the issue and current resources available to travel and tourism companies. The language has been administered in the travel contracts of companies such as USG Corporation, Kraft Foods Group, McDonalds, Reed Elsevier, William Blair, Northern Trust, and Wells Fargo. ECPAT-USA believes this will continue to grow in 2015.

ECPAT USA's recommendations to support the further development of the US Government NAP include:

- 1) **Prioritize protection of children in all business operations** – as the most vulnerable population, children should be expressly protected from exploitation and trafficking in all business supply chains; this can be achieved through instruments such as: corporate ethical policies, clauses in contracts with suppliers, staff training, adherence to international codes of conduct and recognized CSR initiatives.
- 2) **Actively solicit input directly from US businesses** – Convene meetings of stakeholders and businesses to gain input on their work to date and perceived limitations particularly from US members of widely recognized CSR initiatives such as the UN Global Compact and the Global Reporting Initiative.
- 3) **Recognition and reward of good practice** -Organize annual events convened by the US Government, recognizing and rewarding good practice, and allowing companies to showcase their work and responsible conduct. Consider presidential awards on responsible business conduct. Develop and maintain under the auspices of the US Government an online database, of 'good practices' that could serve as examples to be followed by interested companies.
- 4) **Evaluation of progress** - Establish and maintain a separate multi-stakeholder advisory body of experts to provide input if needed on the most sensitive issues, and to evaluate annually the progress of the initiative.
- 5) **Accountability and transparency** - Issue an Annual Report on the progress of the US Government NAP initiative highlighting best practices, trends and ongoing challenges.

ECPAT-USA remains available to provide further assistance in the proceedings of the NAP especially with respect to child rights matters notably trafficking and sexual exploitation, as well as the business engagement in child protection.

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