



# ADMINISTRATION AND REGULATORY AFFAIRS DEPARTMENT

## Regulatory Permitting Policy

Subject: **Human Trafficking Hotel Employee Training**

Policy No.  
**HT-002**

Effective Date:  
**Upon Approval**

### 1. AUTHORITY

1.1. Chapter 28, Houston Code of Ordinances

### 2. PURPOSE

2.1. The purpose of the policy is to establish and build upon the requirement in Sec. 28-212 regarding hotel employee training and certification requirements.

### 3. POLICY STATEMENT

3.1. Under the provisions of Article VI, Division 2 of Chapter 28 of the City of Houston Code of Ordinances, hotels must train their employees and contractors how to identify the signs of Human Trafficking. All training must meet the requirements listed in Sec. 28-212 of the Code in addition to those listed in this policy.

### 4. PROCEDURES

4.1. The policy will be effective from the date of signature.

4.2. This policy is to further expand on the requirements as outlined in Sec. 28-212 of the Code.

4.3. All training must be a minimum of 20 minutes in length and teach employees how to identify sex and labor trafficking indicators, how to identify victims, and how to report human trafficking. For those that take the ECPAT training, there is an additional slide on the following website that details the City of Houston reporting protocol: <https://www.houstonpermittingcenter.org/human-trafficking-prevention>.

4.4. All training must be provided from a vendor on the pre-approved list that is Attachment A to this policy. If you are interested in seeing a training program added to the pre-approved list, please submit a request for review to [info@humantraffickinghouston.org](mailto:info@humantraffickinghouston.org).

4.5. Training must be provided to the employee in a language that they feel most comfortable using.

4.6. The city has partnered with United Against Human Trafficking to offer live training in English and in Spanish.

4.7. The hotel may work directly with United Against Human Trafficking to schedule live trainings. You may visit <https://uaht.org> or call 713-874-0290 to check for dates, times and locations for this live training.

Approved:

DocuSigned by:

Tina Paiz

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Date Approved: 6/1/2020

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4.8. All training shall include (but is not limited to) the following:

4.8.1. An overview of human trafficking, including the experience of its victims, and how and why human trafficking takes place in the hospitality industry;

4.8.2. Guidance on how to identify individuals who are most at risk for human trafficking;

4.8.3. The difference between labor and sex trafficking specific to the hotel sector;

4.8.4. The contact information of appropriate agencies, including, but not limited to, the National Human Trafficking Hotline toll-free telephone number and text line, and the telephone numbers of the appropriate local law enforcement agencies;

4.8.5. The training shall provide each trainee a certificate upon completion of the course; and

4.8.6. If online, the training shall contain a pacing mechanism that requires the trainee to complete all the material.

4.9. All new employees shall be trained within 30 days of hire.

4.10. Records for all employee training shall be maintained in an electronic or paper form. Proof of training shall be made available to the Director as detailed in Sec. 28-212(g).