



Human Trafficking and Other Labor Risks in the Hospitality Sector

April 2026



Verité

Human Trafficking and Other Labor Risks in the Hospitality Sector

Date of Publication: May 11, 2026

This report was funded by a contract from the U.S. Department of State. The opinions, findings, and conclusions stated herein are those of the author and do not necessarily reflect those of the U.S. Department of State.

Verité® provides the knowledge and tools to eliminate the most serious labor and human rights abuses in global supply chains.

Copyright © Verité 2026

Cover photo: IntelligoArt/Shutterstock

Verité, Inc. | verite.org

To share questions or comments about this report, please email: RST@verite.org.

Table of Contents

1. Introduction	4
1.1 Objective	4
1.2 Scope	5
1.3 Context and Methodology	6
2. Overview of the Hospitality Sector	8
2.1 Background	8
2.2 Labor Supply Chain Characteristics	10
2.3 Jobs and Workforce Characteristics	13
3. Risk Factors and Indicators of Forced Labor Associated with the Hospitality Sector	15
3.1 Involvement of Labor Contractors, Recruiters, Agents, or Other Middlemen in Labor Supply Chains	15
3.2 Poverty, Marginalization, and Absence of Alternative Income Options	18
3.3 Migrant Workers and Immigrants with Precarious Residency Status	21
3.4 State-Imposed Forced Labor	25
3.5 Sex Trafficking Associated with the Hospitality Sector	26
4. Recommendations: Due Diligence Steps to Address Risks	26
4.1 Conclusions	26
4.2 Recommendations	27

1. Introduction

1.1 Objective

This report provides an overview of the risks of human trafficking, including forced labor,¹ in the hospitality sector around the world, including in the United States. In some cases, other serious labor abuses are also noted as indicators of the working environment and increased vulnerability to situations that may lead to forced labor.

The objective of the report is to raise awareness of the forms that forced labor may take in the hospitality sector, the structural causes, and the combination of factors that may bind workers to their jobs. The intended audience for these findings includes government and industry actors seeking to strengthen their human rights due diligence approaches to manage the risks of forced labor, as well as workers and their advocates, civil society, and consumers.

Hospitality sector entities operate within an increasingly stringent regulatory environment that demands proactive measures to prevent human trafficking. Federal legislation such as the Trafficking Victims Protection Act, the Tariff Act of 1930, the Trade Facilitation and Trade Enforcement Act of 2015, the Countering America's Adversaries through Sanctions Act, and the Uyghur Forced Labor Prevention Act, as well as relevant regulations like the Federal Acquisition Regulation and various state-level requirements, establish clear expectations for businesses to monitor and address trafficking risks within their operations and supply chains.

Hospitality sector entities also face compelling business reasons to implement robust due diligence systems. The reputational damage from association with trafficking operations can result in immediate loss of contracts, particularly with government agencies and major corporations that have adopted zero-tolerance policies. Furthermore, the operational disruptions caused by trafficking-related investigations can significantly impact service delivery and customer relationships, while the financial costs of remediation and legal proceedings can be substantial.

¹ **Note:** The United States recognizes two primary forms of trafficking in persons: forced labor and sex trafficking. For the purposes of this report, several terms are used such as "trafficking in persons," "human trafficking," and "forced labor." In this report, these terms refer to a crime whereby traffickers exploit and profit at the expense of adults or children by compelling them to perform labor.

While forced labor risks exist across the hospitality sector's diverse operations and materials supply chains, the focus of this report is on labor supply chains and the work done on site at hospitality venues by outsourced and otherwise vulnerable workers.² Guiding frameworks used to benchmark practices and conditions in this sector, which is subject to increasing scrutiny, include, but are not limited to:

- [ILO Convention 29 – Forced Labour Convention, 1930](#)
- [ILO Convention 172 – Working Conditions \(Hotels and Restaurants\) Convention, 1991](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [ILO Guidelines on Decent Work and Socially Responsible Tourism](#)
- [IOM's Establishing Ethical Recruitment Practices in the Hospitality Industry](#)

1.2 Scope

The hospitality sector generally refers to businesses that offer people food, drink, and/or lodging, such as hotels, motels, and resorts, as well as bars, cafes, and restaurants.³ It also encompasses travel and tourism, including companies that facilitate travel and tours, as well as entertainment and recreation, such as casinos, amusement parks, fairs, and carnivals. This report covers the recruitment, contracting, and management of labor involved in lodging, food service, tourism, and entertainment industries. Industries closely related to hospitality, such as janitorial and laundry services and housekeeping, are mentioned in this report and discussed in greater detail in the [Housekeeping/Facilities Services](#) sector report, found on the [Responsible Sourcing Tool \(RST\) website](#). The production of related goods and materials (e.g. food products, bedding, buildings, vehicles) are not addressed in this report. These are discussed in the [Agriculture](#), [Construction](#), and [Transportation](#) sector reports. Hotels are a key venue that traffickers use to exploit individuals, particularly in sex trafficking.⁴ While sex trafficking in the hospitality sector is beyond the scope of this report, a brief discussion of the intersection between sex trafficking and the sector is included in Section 3.5.

² [Guix, Mireia and Maryam Lotfi. "Doing the Right Thing? The Hotel Industry's Management of, and Reporting On, Modern Slavery." *Tourism Management* Volume 107. April 2025.](#)

³ [Cambridge Dictionary. "Hospitality Industry." 2025.](#)

⁴ ["No Room for Trafficking." AHLA Foundation, 2023.](#)

["2020 Federal Human Trafficking Report." Human Trafficking Institute, 2021.](#)

Workers in focus include front- and back-of-house staff⁵ at restaurants, cafes, and bars; catering staff; front- and back-of-house hotel, resort, cruise, and motel staff; entertainment performers and maintenance staff; and tourism staff, including tour leaders. For the purposes of this report, personal care service providers, such as workers in nail salons and beauty parlors, are included as part of the tourism industry. Forced labor is a risk faced by any worker with one or more of the vulnerabilities discussed in this report and is prevalent in the hospitality sector around the world, including the United States. Attention is given to research indicating acute vulnerabilities of migrant, seasonal, and subcontracted workers, who are often exposed to deceptive recruitment, debt bondage, excessive working hours, retention of identity documents, and unsafe working and living conditions.

1.3 Context and Methodology

1.3.1 Risk Factors, Risk Indicators, and Analytical Framework

The hospitality sector includes many different types of jobs ranging from those that are high-skilled and highly compensated to low-skilled and low-paid. As is the case across most industries, certain workers are more vulnerable to forced labor risks than others. This is based mainly on their ability to decline or leave a job in order to protect their welfare. Verité’s research has found that the greatest risk of forced labor is at the intersection of worker vulnerability and employment practices, including recruitment, that exploit that vulnerability. Often overlapping categories of workers at this intersection include those in low-paid, low-skilled, dirty, dangerous, and demeaning (“Three D”) jobs; contract workers and workers hired by third-party intermediaries; migrant workers;⁶ workers compelled by severe economic drivers; and workers subject to coercion by the state.

This report examines both socio-demographic and employment practice-related *risk factors*, which contribute to worker vulnerability, and *risk indicators* or signs, which help identify cases of forced labor. Risk factors and risk indicators have overlapping elements and causes. To help contextualize the many

⁵ Front of house refers to the customer-facing part of a business, such as the staff working in a dining room or bar. Back of house refers to the behind-the-scenes area of a business, such as the kitchen and food prep areas, storage and washing areas, where there is typically less customer interaction.

[Raus, Stacey. “Front of House vs Back of House: The FOH Meaning Decoded.” Revolution Ordering, 13 Jun 2025.](#)

⁶ In this report, the term migrant worker refers to a person who migrates, or has migrated, from one country to another, with a view to being employed by someone other than him/herself, including any person regularly admitted, as a migrant for employment, and/or to seek temporary or permanent residence in another country. This definition is aligned with [ILO Convention C097 – Migration for Employment Convention \(Revised\), 1949](#) and the [U.S. Department of Homeland Security’s Office of Homeland Security Statistics](#).

indicators highlighted by the research, Section 3 organizes them into the three most common **risk factors** that underlie them:

- The involvement of labor contractors, recruiters, agents or other middlemen in the labor supply chain
- Workers experiencing poverty, marginalization,⁷ and absence of alternative income options
- Migrant workers and immigrants with precarious residency status

Research for this report identified and discusses the following **indicators** of forced labor in the hospitality sector:⁸

- Abuse of isolation (including imposing restrictions on movement or communication)
- Abuse of state authority and abuse of compulsory prison labor
- Abuse of vulnerability (including threats of deportation or dismissal)
- Abuse or manipulation of debt
- Deceptive or fraudulent recruitment (e.g., misrepresentation of wages, working conditions, tasks, or job location)
- Degrading work-related living conditions
- Hazardous or degrading working conditions
- Onerous working hours or work schedule
- Physical or sexual violence (including threats of physical or sexual violence)
- Recruitment linked to debt (e.g., charging recruitment fees or other costs that create a burden of debt)
- Retention of identity documents (which can limit a worker’s freedom of movement)

⁷ The [ILO Global Guidelines on the Prevention of Forced Labour Through Lifelong Learning and Skills Development Approaches](#) notes that people most at risk of forced labor are those that are vulnerable and includes marginalization among the common characteristics of vulnerability, along with suffering discrimination on the grounds of age, ethnicity, disability, gender, migration status, race, religion, or sex, etc., leading to social and economic exclusion or marginalization.

⁸ The ILO Forced Labour Convention, 1930 (No.29), defines forced labor as “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.” To support front line actors in the identification of situations of forced labor, ILO Indicators of Forced Labor - 2025 Revised Addition includes 11 of the most common signs observed in forced labor cases. They comprise situations that qualify as the menace of any penalty (also called coercion) and the absence of voluntary consent, or the ability to withdraw that consent, in other words the workers’ freedom to leave the job. (To meet the threshold of forced labor, a situation must have some a *combination* of these two types of abuse.) The 11 indicators do not map exactly to the ILO’s earlier, more granular 2024 *Hard to See, Harder to Count: Handbook on Forced Labour Surveys*, which describes 22 circumstances commonly giving rise to involuntary work or qualify as forms of coercion. The list of indicators here are drawn from both these ILO documents as well as Verité’ research for this report.

- Withholding of wages

1.3.2 Sources of Information and Criteria for Inclusion

Sources of information used for this report include a broad range of publicly available sources, such as civil society publications, journalistic investigations, academic research, and government reporting. These sources were used to identify documented or credible allegations of labor exploitation across hospitality sector operations. We note that the absence of documentation (e.g., research or investigative reports) pertaining to certain geographic locations or types of hospitality businesses does not signify low or the absence of risk and conversely, more available information on locations does not necessarily mean the risk is higher. Further, allegations were not required to meet a legal or prosecutorial threshold to be included in the analysis, and not all findings presented here meet the legal definition of human trafficking. Labor exploitation occurs along a continuum, from fair, safe, and legal work, in which employment is freely chosen, to situations characterized by a combination of involuntariness and coercion.⁹

2. Overview of the Hospitality Sector

2.1 Background

The hospitality sector is a major driver of economic growth in many parts of the world. However, the International Labour Organization (ILO) has noted that the sector includes “decent work deficits, such as the prevalence of informality, variable and long working hours, low wages, limited access to social protection, gender-based discrimination, poor occupational safety and health practices, and weak regulation, enforcement and organization of labour.”¹⁰ These deficits, as well as the fact that the sector is labor-intensive¹¹ with most of the work being service based, contribute to forced labor vulnerability.

⁹ For operational forced labor indicators of involuntariness and coercion developed by the ILO, please refer to the International Labour Organization’s [Hard to See, Harder to Count: Handbook on Forced Labour Surveys](#) (2024). The presence of an indicator alone does not necessarily confirm a legal finding of forced labor but signals elevated risk, especially when multiple indicators are present simultaneously.

¹⁰ [“Tourism, Hotel, and Food & Beverage Services.” International Labour Organization.](#)

¹¹ [“Asia-Pacific Sectorial Labour Market Profile: Accommodation and Food Service Activities.” International Labour Organization, Nov 2022.](#)

Within the sector, hotels range widely in size and quality. Increasingly, many hotels operate under alternative ownership models, such as franchising, lease arrangements, and management contracts, resulting in the growth of many international corporate groups in the industry.¹² In some cases, hotel chains involve “large-scale, multi-tiered, complex franchising with varied actors and supply-chains involved in operations.”¹³ The result is sometimes a reduction in transparency and accountability for labor rights abuses.

The food service industry is very broad, encompassing both restaurants and contract catering providers. As with hotels, the size, nature, and quality of establishments offering food and beverages varies enormously. This component of the hospitality sector includes internationally renowned dining establishments, fast food and restaurant chains (often owned by large, transnational companies), and privately owned, more intimate restaurants.¹⁴ Contract catering firms provide foodservice to hotels, schools, hospitals, military bases, prisons, industrial worksites, and other institutional settings.¹⁵ The contract catering industry is dominated by three major corporations (Compass Group PLC, Sodexo Group, and Aramark) who together held over 50 percent of global outsourced meal service contracts at the end of 2023.¹⁶ A small number of transnational catering companies also control transportation-related catering, such as catering on airlines and railways. The contract catering industry is growing steadily, reflecting increased global demand for outsourcing of services generally, as well as changing social and workplace cultures.¹⁷

In addition to the hotel and food service sectors, the tourism industry includes temporary leisure activities, travel agencies, tour operators, tour guides, cruise ship companies, theme parks,

¹² ["Mapping Risks to Migrant Workers in Supply Chains in Europe: Case Studies and Best Practices from the Agriculture, Food Processing, Manufacturing, and Hospitality Sectors." IOM and HEUNI, 2022.](#)

¹³ [K. Bullock et al. "Under the Radar? Modern Slavery and Labour Exploitation Risks for the Hotel Industry." *Tourism Management* vol 102, June 2024.](#)

¹⁴ ["Worldskills Occupational Standards: Restaurant Service." Worldskills, 2025.](#)

¹⁵ ["Contract Catering: Understanding It and The Challenges It Faces." The Access Group, 16 Jul 2024.](#)

¹⁶ ["Contract Catering Market Size, Share, Growth, and Industry Analysis, By Type \(Fixed Price, Cost-Plus\), By Application \(B&I, Education, Healthcare, Senior Care\), Regional Insights and Forecast to 2033." HG Market Growth Reports, 29 Sept 2025.](#)

¹⁷ ["Contract Catering Market Size, Share, Growth, and Industry Analysis, By Type \(Fixed Price, Cost-Plus\), By Application \(B&I, Education, Healthcare, Senior Care\), Regional Insights and Forecast to 2033." HG Market Growth Reports, 29 Sept 2025.](#)

medical/wellness retreats, and providers of recreational and leisure activities. The workforce is relatively young and many workers have temporary contracts and low job seniority and security.¹⁸

The entertainment industry within the hospitality sector refers to activities that offer recreation, relaxation, and enjoyment. Specific functions include such venues as spas, casinos, amusement parks, carnivals, movie theaters, zoos, and museums.¹⁹

As of 2023, the hospitality sector employed approximately 169 million people globally.²⁰ It is one of the fastest growing components of the global economy, with growth across all sub-sector industries, but led by particularly robust growth in the global tourism industry. The World Travel & Tourism Council reported that Travel & Tourism alone contributed USD 10.9 trillion to global GDP in 2024.²¹

2.2 Labor Supply Chain Characteristics

Employment in the hospitality sector has been described as increasingly “fissured,” with the brand companies that establish policies on such issues as forced child labor, wages, and working conditions having no direct relationship with most workers. In many cases, certain categories of workers providing goods and services are actually excluded from the scope of these companies’ human rights policies.²² The effect is typically a reduction in oversight and accountability for forced labor risks.

2.2.1 Franchise Employees

Franchised businesses are increasingly common across the hospitality sector, most notably in hotels and restaurants. In the franchise model, the franchisor (often a large, multi-national company) sells rights to use its brand to a franchisee (an individual business owner, or increasingly, an incorporated business or trust). The franchisee agrees to follow the franchisor’s business model, often but not always including labor standards that impact conditions of work for employees, and to pay royalties or fees.²³ Brands that operate through international franchises often have human rights policies, however some include

¹⁸ [“Tourism Industries – Employment.” Eurostat, April 2024.](#)

¹⁹ [“Hospitality sectors: The four sectors in the hospitality business.” Site Miner, 30 June 2025.](#)

²⁰ [“Tourism, Hotel, and Food & Beverage Services.” International Labour Organization.](#)

²¹ [World Travel & Tourism Council \(WTTC\) *Economic Impact Analysis*.](#)

²² Weil, David. *Enforcing Labor Standards in Fissured Workplaces: The US Experience*. The Economic and Labour Relations Review Vol. 22 No. 2. July 2011.

²³ [U.S. Small Business Administration. *Franchise Businesses*.](#)

disclaimer language in these policies asserting that they are not always able to implement these policies at all franchise locations in part because of differing local labor standards. They also include disclaimer language noting that labor and employment conditions may therefore vary at specific locations.²⁴ As a general rule, franchisees are less focused on brand reputation and are known to push back on the financial burdens of implementing the licensor brands' human rights commitments.²⁵ Major chains that operate through franchise models often have higher rates of labor violations than businesses that own and operate their own stores; for example, a 2024 investigation found that food service in the United States, in particular franchised locations of large brands, were responsible for more than three-quarters of all child labor violations in the first nine months of 2023.²⁶

2.2.2 Use of Outsourced Staffing and Labor Recruiters

Workers can also fall outside the scope of many brands' due diligence efforts when they are contracted directly by third-party staffing agencies²⁷ that recruit, hire, and manage workers. These outsourced workers are increasingly replacing directly-employed employees in many hotels,²⁸ with third-party agencies commonly providing workers for housekeeping, janitorial services, security, valet, grounds and landscaping, food and beverage, and laundry.²⁹ Workers hired and managed through agencies are often considered temporary employees by venue management even though they may have worked at the venue for many years, resulting in a lack of job security.³⁰ These employment models can dilute or

²⁴ [Verseman, Lauren. "Corporate Social Responsibility: Are Franchises off the Hook, or Can a Treaty Catch Them?" *Washington University Global Studies Law Review* 16:1, 2017.](#)

²⁵ [Verseman, Lauren. "Corporate Social Responsibility: Are Franchises off the Hook, or Can a Treaty Catch Them?" *Washington University Global Studies Law Review* 16:1, 2017.](#)

²⁶ [Gurley, Lauren Kaori and Emmanuel Martinez. "Fast-Food Giants Overwork Teenagers, Driving America's Child Labor Crisis." *The Washington Post*, 14 Jan 2024.](#)

²⁷ The combination of services provided by third parties to find, place, and/or directly contract labor to work in company-owned or supplier operations are varied, as are the terms used by different sectors and standards organizations to describe the providers. These include: labor agents, recruiters, recruitment agents, sub-agents, labor providers, private employment agencies (PEAs), staffing agents, manpower agents, brokers, contractors, crew leaders, and gangmasters.

²⁸ [K. Bullock et al. "Under the Radar? Modern Slavery and Labour Exploitation Risks for the Hotel Industry." *Tourism Management* vol 102, June 2024.](#)

²⁹ [The Service Companies. *Services*.](#)

[Hospitality Staffing Solutions.](#)

³⁰ [Jamieson, Dave, "As Hotels Outsource Jobs, Workers Lose Hold On Living Wage," *Huffington Post*. August 24, 2011.](#)

["Mapping Risks to Migrant Workers in Supply Chains in Europe: Case Studies and Best Practices from the Agriculture, Food Processing, Manufacturing, and Hospitality Sectors." IOM and HEUNI, 2022.](#)

obscure accountability for compliance with human rights norms and legal standards and have several implications for workers' vulnerability to forced labor. Workers in these cases do not have direct employment relationships with the entity or venue at which they are working and typically have reduced—or no—access to grievance channels to those entities as well as to remedy.³¹

Workers on cruise ships are commonly recruited via third-party recruitment agencies, exposing them to the potential risk of paying up-front recruitment fees (see Section 3.1). While many cruise ship workers are ultimately directly hired by the cruise line company after being recruited by a third party, independent establishments (known as concessionaires) operating on cruise ships (e.g., retail stores, food establishments, and art galleries) recruit, hire, and manage their own employees.³² This creates a situation in which workers on a single albeit large cruise ship are working for numerous employers and in some cases under different labor standards and levels of commitment to human rights.

The staffing industry is highly competitive and the price point on a bid for a contract with an entity in need of services is closely linked to agencies' cost per worker. This can result in lower wages, fewer benefits, and less stable employment environments. The workers most vulnerable to the impacts of labor cost reductions, and in the worst case, exploitation, are those with the lowest level of skill, most easily replaced, and having the fewest alternative sources of income. Further, the likelihood of outsourcing low-skilled work is high, especially in industries where businesses rely on a mix of high- and low-skilled positions.³³

2.2.3 Other Labor Sources

Other forms of worker recruitment and sourcing in the hospitality sector include state-sponsored labor deployments (in which governments send workers abroad for hospitality jobs or in which workers are

Note: Risk is greatest for workers who are recruited, hired, and managed through third parties. Many companies across sectors use labor recruiters to identify employees who are ultimately employed by the company itself; this dynamic creates the risk of workers taking on debt to pay recruitment costs and related fees.

³¹ [“Establishing Ethical Recruitment Practices in the Hospitality Industry.” IOM, 2022.](#)

³² [Cruise Line Jobs. *Working for a Concessionaire vs. a Cruise Line.*](#)

[AWC Cruise Ship Recruitment.](#)

[Motz, Connie. “Working for a Concessionaire vs. a Cruise Line.” *Cruise.jobs*, 29 Nov 2010.](#)

³³ [Weil, David. *Enforcing Labor Standards in Fissured Workplaces: The US Experience.* *The Economic and Labour Relations Review* Vol. 22 No. 2. July 2011.](#)

[“Why Outsourcing Hotel Staff is the Secret to 5-Star Guest Service.” *Standout Staffing*, Apr 2022.](#)

hired through government-affiliated agencies) as well as work release programs for incarcerated individuals.³⁴ These programs have been the subject of scrutiny, as described further in Section 3.4.

2.3 Jobs and Workforce Characteristics

Work in the hospitality sector ranges from specialized and skilled jobs such as tour guiding and senior chef positions, to low-skilled and undesirable jobs such as dishwashing, housekeeping, and sanitation. Hotel industry jobs include front desk, valet, concierge, wait staff, bartender, housekeeping staff, room service staff, spa and recreation staff, security staff, maintenance and engineering staff, information technology staff, and hotel management staff. Food service industry positions include chefs, line cooks, dishwashers, wait staff, bartenders, cashiers, hostesses, drivers, and managers. The tourism and entertainment industries, including tour companies, cruise ships and theme parks, include a wide range of jobs from desk clerks to drivers, cooks and dishwashers, maintenance crews and performers to massage therapists at spas and manicurists at nail salons.

Throughout the United States, the leisure and hospitality sector is the lowest-paid sector, although recent wage increases have resulted in a decrease of wage inequality experienced in the sector by 30 percent on average.³⁵ In 2023, in the United States, the leisure and hospitality sector was the sector with the highest percentage of workers earning hourly wages at or below the federal minimum wage (6 percent).³⁶ In 2023 and 2024, the U.S. food service sector topped the U.S. Department of Labor's Low Wage, High Violation Industries list with 3,827 compliance actions in 2024 and 4,095 in 2023.³⁷ The vast majority of positions in the sector are relatively low-skilled and poorly paid. As of August 2025, the Leisure and Hospitality sector, as referred to by the U.S. Bureau of Labor Statistics, employed around 17 million people. Of these, almost 15 million worked in production and nonsupervisory roles.³⁸

³⁴ [U.S. Department of State. 2025 Trafficking in Persons Report.](#)

[Badcock, J. "World's Largest Cruise Liner Accused of Knowingly Hiring 'Slave Labour' Cubans." *The Telegraph*, 26 Jan 2022.](#)

[Alvi, Julia et al. "Exports & Exploitation: U.S. Prison Labour Hidden in Canadian Supply Chains." *International Human Rights Program \(IHRP\) at the Henry N.R. Jackman Faculty of Law, University of Toronto*, 2025.](#)

[Hidden prison labor web linked to foods from Target, Walmart | AP News](#)

³⁵ [Henderson, Tim. "Hospitality workers' wages are rising faster than high earners' in most states." *Stateline*, 9 Jan 2024.](#)

³⁶ [United States Department of Labor, Bureau of Labor Statistics. "Characteristics of minimum wage workers, 2023." May 2024.](#)

³⁷ [United States Department of Labor, Wage and Hour Division. "Low Wage, High Violation Industries." 1 Oct 2025.](#)

³⁸ [United States Department of Labor, Bureau of Labor Statistics. *Industries at a Glance: Leisure and Hospitality*.](#)

Union participation in the sector is very low, with only 3 percent of the workforce reporting union membership.³⁹ There have been allegations of union-busting by major hotel chains, and the trend toward outsourcing is accelerating.⁴⁰

There is high staff turnover in the hotel, restaurant, and tourism industries, attributed to the lack of job stability (the sector is very vulnerable to market and seasonal fluctuations, and workers are commonly laid off on short notice), irregular hours, lack of opportunities for upward mobility, and low pay.⁴¹

According to the ILO, the tourism industry employs a large number of part-time, temporary, and seasonal workers, many of whom are subcontracted or outsourced.⁴² Many jobs in the hospitality sector have low skill and no language requirements (e.g., needing to speak a particular language, particularly for back of house positions), making the sector an entry point for many migrant workers, young people, and women seeking more secure or desirable jobs eventually.⁴³ In 2023, 57.6 percent of the tourism industry's employees in the European Union were women.⁴⁴

³⁹ [United States Department of Labor, Bureau of Labor Statistics. *Industries at a Glance: Leisure and Hospitality*.](#)

⁴⁰ [Russo, Jeff. "Workers at Hyatt Regency Buffalo Accuse Hotel of Union-Busting." WKBW News, 9 Oct 2024.](#)

[Joly, Aidan and Kayleigh Huner-Gasperini. "Union Workers Ask for Boycott of One of Buffalo's Largest Hotels." WIVB News, 20 Oct 2025.](#)

⁴¹ [International Labor Organization \(ILO\). *Sectoral Brief: Hotels, catering and tourism. Social protection*.](#)

["Mapping Risks to Migrant Workers in Supply Chains in Europe: Case Studies and Best Practices from the Agriculture, Food Processing, Manufacturing, and Hospitality Sectors." IOM and HEUNI, 2022.](#)

⁴² [International Labor Organization \(ILO\). *Sectoral Brief: Hotels, catering and tourism. Employment*.](#)

⁴³ [Halvorsen, Beni et al. "Migrant Workers in Hospitality." *The Routledge Handbook of Diversity, Equity, and Inclusion Management in the Hospitality Industry*. Routledge, 2023.](#)

["Mapping Risks to Migrant Workers in Supply Chains in Europe: Case Studies and Best Practices from the Agriculture, Food Processing, Manufacturing, and Hospitality Sectors." IOM and HEUNI, 2022.](#)

[International Labour Organization. "Asia-Pacific Sectoral Labour Market Profile: Accommodation and food service activities." ILO Brief, Nov 2022.](#)

[World Bank Group. "Tourism and Competitiveness." 14 May 2025.](#)

⁴⁴ ["EU tourism industries employed 11.3 million people." Eurostat, 29 May 2024.](#)

3. Risk Factors and Indicators of Forced Labor Associated with the Hospitality Sector

Forced labor has been documented extensively around the world. For example, the U.S. Department of State's 2025 *Trafficking in Persons Report* noted either evidence of or the risk⁴⁵ of human trafficking (including forced labor), in the hospitality sector in the following 43 countries: Australia, Bahrain, Bangladesh, Brazil, Bulgaria, Canada, Chile, Equatorial Guinea, Fiji (risk), Germany, Honduras, Hungary, Indonesia (risk), Iraq, Ireland, Italy, Kazakhstan (risk), Kuwait, Laos, Latvia (risk), Lesotho, Lithuania (risk), Luxembourg, Malta (risk), Marshall Islands, Moldova, Montenegro, Netherlands, New Zealand, Norway (risk), Palau, Romania (risk), Saudi Arabia, Slovakia, South Africa, Suriname, Switzerland, Thailand (risk), Uganda, Ukraine (risk), United Kingdom, United States, and Vanuatu.⁴⁶

Across the many countries where forced labor and forced labor risk in the hospitality sector have been identified are common drivers and employment practices that can result in a variety of types of abuse, ranging from, at best, work hour violations and the absence of permanent contracts that can increase the risk of exploitation to, at worst, situations of forced labor.⁴⁷ The following sections discuss factors and practices common to many of the above countries that increase vulnerability to forced labor in the hospitality sector, as well as actual indicators of forced labor that have been documented.

3.1 *Involvement of Labor Contractors, Recruiters, Agents, or Other Middlemen in Labor Supply Chains*

International labor brokers, recruitment agents, and other middlemen often play a role in the supply of labor to the hospitality sector as it is a preferred and money saving business model; it is also essential for facilitating the hiring and, in some cases, movement, of the many migrant workers employed in the sector. The presence of such middlemen in labor supply chains represents an inherent risk factor for trafficking, due to the likelihood of workers becoming indebted or otherwise dependent on them in the course of their recruitment and job placement through such practices as charging fees and expenses, withholding identity documentation, and facilitating establishment of and access to bank accounts. In

⁴⁵ Risk of, or, vulnerability to, forced labor in the hospitality sector, as opposed to documented evidence of forced labor, is indicated by the inclusion of "(risk)" following the country in which the risk or vulnerability was reported.

⁴⁶ [U.S. Department of State. 2025 Trafficking in Persons Report.](#)

⁴⁷ ["Exploitation on the Menu: Labor Trafficking in the Restaurant Industry." Stop Modern Day Slavery, July 2021.](#)

some cases, workers are recruited via relatives or through word-of-mouth rather than through employment service companies, which “can make it easier for the exploiters to remain under the radar, as no official recruitment methods are used.”⁴⁸ Underlying these practices, and compounding the associated vulnerability, the workers recruited and hired through middlemen are often international migrant workers who may be unfamiliar with the local language and separated from social networks, as well as experiencing marginalization, poverty, and the absence of alternative employment options; these factors, which can make it harder for workers to walk away from a job should they want to, are discussed further in sections 3.2 and 3.3 below.

Domestic hospitality workers are often recruited, hired, and managed by third-party staffing agencies. These third-party agencies allow companies to avoid direct employment relationships with workers (that entail extra costs) and maintain a highly flexible workforce. Third-party agencies commonly provide staff to hotels and other hospitality venues such as event venues for functions including housekeeping, janitorial services, security, valet, grounds and landscaping, food and beverage, and laundry.⁴⁹

3.1.1 Illustrative Cases

Deceptive recruitment is an indicator of forced labor in which labor recruiters and employers purposely deceive prospective workers, usually migrant workers, about the nature and terms of the jobs they are being recruited for. In many cases, the specific job function, hours of work, rate of pay, and even the industry itself, differ significantly from what was advertised or promised. Examples include women from Jamaica being “charged recruitment fees, being misled about their terms of employment, and [being] compelled through threats to continue working in the U.S. hospitality industry.”⁵⁰ Traffickers in Southeast Asia have been found to use fraudulent job postings with false promises of high-paying jobs in a variety of sectors, including hospitality, in order to recruit Kenyan workers to Thailand, where they are transported by traffickers to neighboring countries (primarily Burma, Malaysia, and Laos) and exploited in labor trafficking, including in online scam operations.⁵¹ Traffickers similarly exploit workers from

⁴⁸ [“Exploitation on the Menu: Labor Trafficking in the Restaurant Industry.” Stop Modern Day Slavery, July 2021.](#)

⁴⁹ [The Service Companies. Services.](#)

⁵⁰ [U.S. Department of State. 2025 Trafficking in Persons Report.](#)

⁵¹ [U.S. Department of State. 2025 Trafficking in Persons Report.](#)

Lesotho in forced labor and sex trafficking by luring them to South Africa and the Middle East under the false pretense of lucrative jobs in the hospitality sector.⁵²

Contract substitution is a specific type of deceptive recruitment. A study of labor trafficking in Chinese restaurants in the Netherlands found that workers were routinely provided with two different contracts during their recruitment: one in Dutch that aligned with Dutch labor law and collective agreements for restaurants, including a 38 hour work week and nearly 1,600 euros a month, and one in Chinese that promised half as much money; indicated that the first 1-3 months would be a training period with work taking place six days a week; noted undefined hours of work per day ending only “when the last guest leaves;” and stipulated the worker would receive no overtime or holidays. The study also found that workers had taken on significant recruitment-related debt to secure the jobs.⁵³

The carnival industry in the United States is considered high risk for forced labor and other forms of labor exploitation, in part because of the presence of labor intermediaries who secure H-2B visas and job placements for carnival workers from Mexico. In May 2024, the owner of a traveling carnival business was charged with crimes related to a scheme to exploit foreign workers involving visa fraud and fraud in foreign labor contracting. The owner allegedly recruited foreign seasonal workers after having submitted falsified temporary employment applications to obtain H-2B visas; upon arrival in the United States, the owner charged workers illegal fees, paid substandard wages, and threatened them with deportation and employment termination.⁵⁴

A Reuters investigation found that one former circus performer’s recruitment company, JKJ Workforce, facilitated the employment of nearly 4,000 Mexican workers in 2015, working in coordination with a recruiter based in Mexico. Workers recruited under their efforts were paid USD 316.22 weekly, working up to 20 hours a day under unsafe conditions and living in sub-standard employer-provided housing arrangements. A 2014 lawsuit against JKJ alleged that the company had created a pseudo union that ‘agreed’ to weekly pay that is below minimum wage, which is one of the few ways to circumvent the visa program’s requirement that employers pay workers minimum wages; ultimately, the collective-

⁵² [U.S. Department of State. 2025 Trafficking in Persons Report.](#)

⁵³ [Van Meeteren, Masja and Ellen Wiering. “Labour Trafficking in Chinese Restaurants in the Netherlands and the Role of Dutch Immigration Policies. A Qualitative Analysis of Investigative Case Files.” *Crime, Law, and Social Change* 72: 107 – 124. 2019.](#)

⁵⁴ [“Traveling Carnival Owner Charged With Multiple Crimes Tied to Alleged Labor Exploitation.” U.S. Immigration and Customs Enforcement, 9 May 2024.](#)

bargaining agreements were dissolved and workers were awarded backpay. Workers further reported being threatened with losing their jobs if they complained about wages or working conditions.⁵⁵

3.2 Poverty, Marginalization, and Absence of Alternative Income Options

The nature of the entry-level jobs in the hospitality sector (requiring little training, skill, language fluency, or formal education) makes them accessible to poor women, children, less-educated individuals, and illegal migrants—groups who tend to be more vulnerable to trafficking in persons than other workers.

People living in poverty often lack social networks and relationships that would support their access to economic, employment, and educational opportunities. Jobs that are undesirable, dangerous, or otherwise difficult—and low-paying—are generally avoided by workers who have access to other options. The work is thus commonly done by individuals in extreme poverty, socially marginalized groups, migrant workers, immigrants who may not have local language fluency or transferable skills, and other minority groups.⁵⁶ Because they have little choice, these workers are more likely to accept terms that ultimately compel them to continue working, despite exploitive, abusive, or unsafe practices.

As described in Section 2.3, hospitality sector work tends to be low-paid, precarious, and sometimes hazardous, and performed by individuals experiencing poverty, some type of social or economic marginalization (e.g., not being fluent in the local language, from a community that is discriminated against, not having access to educational or training opportunities due to geographic or financial barriers), and/or who do not have access to alternative income options. The restaurant industry is known for tight margins, which puts pressures on business owners to keep labor costs low; this can lead,

⁵⁵ [Rosenberg, Mica and Megan Twohey. "The Long Ride: Former Circus Owner Emerges as Powerful Figure in Pipeline of Workers From Mexico." *Reuters*, 23 Dec 2015.](#)

["\\$500 Million Carnival Industry Depends on Mexican Laborers Paid Below Minimum Wage." *Human Rights First*, 20 Jan 2016.](#)

⁵⁶ [Lenko, Mariya et al. "Migrant Work Conditions and Health Status – A Longitudinal Study on 'Dirty Work' Among Undocumented and Newly Regularized Workers." *Journal of International Migration and Integration* 10 \(26\), Aug 2024.](#)

[Maison Law. "The Unsafe 3-D Jobs of Migrant Workers." 28 Dec 2018.](#)

["Immigrants in the Low-Wage Workforce." *Work Rise Network*, 25 Aug 2025.](#)

[Farhana, M.H. et al. "Dirty, Dangerous, and Difficult Sectors: Challenges, Opportunities and Way Forward." *Malaysian Journal of Industrial Technology* 8\(3\), Sept 2024.](#)

in some situations, to hiring vulnerable populations informally, or “under-the-table.”⁵⁷ These characteristics can become risk factors for forced labor in certain situations.

3.2.1 Hazardous Work and the Workers Who Perform It

Work in the hospitality sector can be very demanding and hazardous. Jobs often require employees to endure long periods of standing and/or walking and may also include lifting and carrying heavy loads. Specific jobs, like dishwashing, hotel cleaning, and cruise ship maintenance, involve frequent exposure to harsh cleaning products and other chemicals. Kitchen employees working in restaurants, catering, cruise kitchens, or hotels are exposed to a variety of dangerous equipment that can result in cuts and burns. Back-of-the-house food service staff also typically work long and late hours,⁵⁸ sometimes with no breaks or days off.⁵⁹

Many housekeepers working in the hospitality sector have strict quotas to complete on each shift.⁶⁰ Hotel housekeepers, for example, are often required to clean up to 20 rooms per day.⁶¹ Hotel housekeepers report injuries from tasks such as lifting heavy mattresses, particularly under tight time constraints. The average hotel laundry worker handles over two tons of laundry per day⁶² which can lead to severe skeletal muscular injury and pain.

Violence and harassment from management and customers have been reported in association with the hospitality sector as well.⁶³ Sexual harassment and abuse are particular dangers for women, especially young women, working in the hospitality sector. Many positions in the sector place a premium on satisfaction of all customer expectations. Many female workers are therefore expected to appear socially friendly and attractive to customers, which have led to instances of sexual abuse, harassment, and assault from both customers and employers. Further, the power imbalances that young female

⁵⁷ [Tseng, Esther. “Undocumented Restaurant Workers Have Held the Industry Together. Now They Stand to Lose the Most.” *Civil Eats*, 28 May 2020.](#)

[McKim, Jenifer. “‘Working Like a Slave’: Why Human Trafficking in Restaurants is Underreported.” WGBH, 17 Jan 2023.](#)

⁵⁸ [Burkey, Stefan. “The Under-Reported Risk of Labor Trafficking in the Restaurant Business.” *Today's Restaurant*, 1 Feb 2025.](#)

⁵⁹ [Trafficking, Inc., Part 3: ‘Working like a slave’: Why human trafficking in restaurants is underreported | GBH](#)

⁶⁰ [“Housekeeping Can Be Dangerous Work.” *Unite Here*, Sept 2020.](#)

⁶¹ [Applied Logistics. *Housekeeping*.](#)

⁶² [Applied Logistics. *Laundry*.](#)

⁶³ [Baum, Tom. International Migration Branch and Sectoral Activities Department, International Labor Organization. *Migrant workers in the international hotel industry. International migration Paper No. 112. April 1, 2012.*](#)

workers experience in an industry where most leadership positions are filled by men result in a low level of reporting of abuse and negative consequences (such as a reduction in work hours) when reports are made.⁶⁴

3.2.2 Illustrative Cases

Cases of human trafficking have been documented in the nail salon industry worldwide.⁶⁵ Numerous instances have been documented in the United States in recent years. For example, in 2021, the owner of a nail salon in North Carolina was found guilty of compelling the labor of one of her nail technicians. The owner was found to have physically assaulted the worker on numerous occasions, mentally abused her, humiliated her, threatened her reputation, fabricated a debt of USD 180,000, and claimed that the worker caused her to lose money. She also threatened the worker with sending her to jail if she did not pay off all the “debt.” According to the case, the owner’s coercive scheme and abuse caused the worker such fear that she continued to work at the nail salon until a particularly violent assault led her to report the situation to the local authorities.⁶⁶

In 2024, a former dancer for Shen Yun Performing Arts (a music and dance company associated with the Falun Gong religious movement) filed a lawsuit accusing the group of trafficking vulnerable children and making them work for little to no pay.⁶⁷ According to the lawsuit, vulnerable children are recruited from around the world to join the group and enroll in training academies at the Shen Yun’s isolated and guarded headquarters. Once there, they are isolated from their families, have no network in the United States, and are forced into “a system of coercion and control that extends to nearly every aspect of the dancers’ lives.”⁶⁸

⁶⁴ [Taylor, Charlotte. “Addressing Sexual Harassment in the Hospitality Industry.” *Culture Shift*, 27 Dec 2024.](#)

⁶⁵ [“Modern slavery: Nail salons 'using trafficked individuals'.” *BBC*, 18 Jan 2018.](#)

[“The Typology of Modern Slavery: Defining Sex and Labor Trafficking in the United States.” *Polaris*, Mar 2017.](#)

[“Increasing Reports of Exploitation of Workers in Nail Salons.” *European Migration Network*, 17 Aug 2024.](#)

⁶⁶ [“North Carolina Nail Salon Owner Convicted of Forced Labor.” U.S. Department of Justice, 8 Jan 2021.](#)

⁶⁷ [Hong, Nicole and Michael Rothfeld. “Ex-Dancer Accuses Shen Yun of Forced Labor and Trafficking in Lawsuit.” *New York Times*, 25 Nov 2024.](#)

⁶⁸ [Hong, Nicole and Michael Rothfeld. “Ex-Dancer Accuses Shen Yun of Forced Labor and Trafficking in Lawsuit.” *New York Times*, 25 Nov 2024.](#)

In India, children are forced to perform circus acts on the street.⁶⁹ While the Indian Supreme Court banned circuses from including child performers in 2011, resulting in the release of many child performers, many of whom were from Nepal, children can still be found among communities of street performers in urban centers, where they perform acts like walking on tight ropes.⁷⁰

3.3 *Migrant Workers and Immigrants with Precarious Residency Status*

Migrant workers make up a large part of the hospitality sector workforce around the world. The decent work deficits in the sector, including common informality, long working hours, low wages, poor occupational safety and health practices, and frequent outsourcing arrangements, create vulnerabilities for these workers. Their vulnerability to exploitation by middlemen, as described in 3.1 above, is increased by such circumstances as being unfamiliar with local cultural norms and often the language, and being cut off from support networks and other social resources. Migrant hospitality workers often end up dependent on labor intermediaries or employers not only for their job placements, but also for their visas, work permits, housing, and other essentials, leaving them vulnerable to manipulation and accrual of debt.

Many of the migrant workers in the U.S. hospitality sector are of Latin American origin, where push factors in the sending country such as poverty and political instability have driven migrants to seek low-skilled hotel and restaurant jobs.⁷¹ Organized criminal networks are sometimes involved in their recruitment and travel to the United States.⁷² For migrants who seek official channels of migration, vulnerability still exists. Once in the United States, immigration and visa policies often make it virtually impossible for workers to change jobs legally if the workers find themselves in untenable or illegal

⁶⁹ [Ahmed, Aijaz. "Risking Innocence: The Harsh Reality of Children Forced into Performing Life-Threatening Act \(Circus\)." *Counter Currents*, 5 Feb 2025.](#)

⁷⁰ [Ahmed, Aijaz. "Risking Innocence: The Harsh Reality of Children Forced into Performing Life-Threatening Act \(Circus\)." *Counter Currents*, 5 Feb 2025.](#)

[Rees, Gwyneth. "India to Wales: The Trafficked Children Rescued from the Circus." *BBC*, 20 Jun 2019.](#)

[Jha, Bagish. "'Trafficking Gang Sold Infants to Raj Street Performers.'" *The Times of India*, 18 Jan 2022.](#)

⁷¹ [Baum, Tom. International Migration Branch and Sectoral Activities Department, International Labor Organization. *Migrant workers in the international hotel industry*. International migration Paper No. 112. April 1, 2012.](#)

["Restaurant Employee Demographics." National Restaurant Association, April 2025.](#)

⁷² ["Human Smuggling." U.S. Immigration and Customs Enforcement, 20 Aug 2025.](#)

working situations.⁷³ Immigrants from Mexico, Central America, and East and Southeast Asia have experienced human trafficking in the U.S. restaurant industry as cooks, wait staff, and bussers in restaurants, food trucks, buffets, and taquerias. A 2025 study on labor trafficking in the construction and hospitality sectors in the United States found that employers exploit both regular (legal) migrant workers and irregular (illegal) migrant workers⁷⁴ “and prevent them from seeking help for their exploitation. Immigrant workers also experience barriers to accessing legal help and other community-based assistance for their exploitation.”⁷⁵ They are commonly lured by promises of well-paying jobs and valid immigration status, only to be forced to work long hours, provided sub-standard housing, and to have their pay withheld on top of being charged large fees and taking on significant debt.⁷⁶

The hospitality sector in the United States is also heavily dependent on young, university-age foreign guests participating in the “Summer Work Travel Program,” which is one of several types of exchange visitor programs (J-1 visas). The program is sponsored by the U.S. Department of State to promote cultural exchange, though media reporting indicates that abuse of some participants by unscrupulous hosts has occurred. This has included young foreign guests who may face high, illegal fees to secure their J-1 visas, and who may encounter work conditions and pay starkly different from what was promised, substandard living conditions, harassment, and other issues that can potentially amount to human trafficking.⁷⁷ These instances underscore how the program also serves as a source of low-cost labor for hotels, camps, restaurants, shops, and other businesses that rely heavily on short term summer labor.

⁷³ According to the [IOM Migration Glossary](#), irregular migration refers to the movement of persons that takes place outside the laws, regulations, or international agreements governing the entry into the destination or exit from the State of origin, transit or destination. The U.S. government designates such irregular migrants as “illegal migrants.”

[Yu, Lilly et al. “Labor Trafficking in Construction and Hospitality Topical Brief: Immigrant Workers.” RTI International, 7 Apr 2025.](#)

⁷⁴ According to the [IOM Migration Glossary](#), irregular migration refers to the movement of persons that takes place outside the laws, regulations, or international agreements governing the entry into the destination or exit from the State of origin, transit or destination. The U.S. government designates such irregular migrants as “illegal migrants.”

⁷⁵ [Yu, Lilly et al. “Labor Trafficking in Construction and Hospitality Topical Brief: Immigrant Workers.” RTI International, 7 Apr 2025.](#)

⁷⁶ [Godoy, Maria. “In U.S. Restaurants, Bars and Food Trucks, ‘Modern Slavery’ Persists.” NPR, 29 Mar 2017.](#)

⁷⁷ [Sainato, Michael. “‘Used as Cheap Labor’: Luxury Aspen Resort Abused Visa Program, Lawsuit Says.” *The Guardian*, 13 Nov 2023.](#)

[Harris, Amy Julia. “They Were Promised a Taste of America.” They Got Abuse and Exploitation.” *The New York Times*, 20 Sept 2025.](#)

3.3.1 Illustrative Cases

Significant numbers of migrants from Asia also seek work in the hospitality sector abroad. One particularly large out-flow of Asian workers is to the United Arab Emirates (UAE), which has a booming hotel and tourism industry.⁷⁸ The UAE is reliant on migrant labor in order to sustain its rapid rate of economic growth and high standard of living: eighty-eight percent of the UAE’s population of 10 million constitutes migrants.⁷⁹ The temporary guest worker program in UAE, the Kafala sponsorship system—which is also used across a number of Gulf Cooperation Council (GCC) Countries (also referred to as Gulf States)—ties migrants’ immigration status to their employment by a particular employer, an arrangement that renders workers highly dependent on their employers and increases opportunities for migrant labor abuses. While the UAE and other countries have made reforms to the Kafala system in response to concerns voiced about such abuses, civil society organizations note that widespread abusive labor practices continue, primarily as a result of inadequate enforcement efforts.⁸⁰ Because the Kafala sponsorship system requires workers to obtain their employers’ permission to transfer jobs, end their job, or leave the host country, many experts have noted that the system “facilitate[s] modern slavery.”⁸¹

Migrant workers from Africa and Asia working in hotels in Qatar for the 2022 FIFA World Cup were subjected to serious labor abuses and human rights violations, according to investigations conducted by Equidem and GLJ-ILRF between February 2020 and July 2022. The investigations found evidence of significant violations, including sexual harassment, nationality- and sex-based discrimination, wage theft, health and safety risks, sudden loss of employment, deceptive recruitment, and illegal recruitment charges, at 13 out of 17 FIFA partner hotel groups in Qatar.⁸²

⁷⁸ [Baus, Sreeradha and Anumeha Chaturvedi. “Indian Hospitality Staff Get a Warm Welcome Abroad.” The Economic Times, 17 May 2025.](#)

⁷⁹ [Wachira, Mercy et al. “Financial Inclusion of Blue-Collar Migrants in the UAE: The Case of RAKBANK and Edenred.” UN Capital Development Fund.](#)

⁸⁰ [De Bel-Air, Françoise. “As the Gulf Region Seeks a Pivot, Reforms to Its Oft-Criticized Immigration Policies Remain a Work in Progress.” Migration Policy Institute, 5 Dec 2024.](#)

⁸¹ [Robinson, Kali. “What is the Kafala System?” Council on Foreign Relations, 18 Nov 2022.](#)

⁸² [“We work like robots.” Discrimination and Exploitation of Migrant Workers in FIFA World Cup Qatar 2022 Hotels. Equidem and GLJ-ILRF, 2022.](#)

Qatar has since abolished the Kafala system (as has Saudi Arabia) and other Gulf States have made reforms allowing migrant workers greater freedom of movement in changing employers, although migrant workers in the GCC region remain vulnerable to exploitation.⁸³

Migrants may also be exploited in the hospitality sector as a result of their ethnic difference or minority status. A report by the Joseph Rowntree Foundation looked at human trafficking in the British food industry, including agriculture, food processing, and catering. In the report, interviewed migrant workers reported paying upfront fees and debt bondage, threats and bullying, disciplining through dismissal and threats of denunciation, productivity targets and workplace surveillance, overwork, no breaks or holidays, non- and underpayment of wages, underwork and indebtedness, deductions and charges, and passport retention. The report highlighted particularly long hours for Chinese workers in what it termed “minority ethnic catering.”⁸⁴

In many cases, migrant workers are dependent on employers for essential items such as housing and food in addition to employment. Employers can use these dependencies to exploit workers and coerce them into working for very little pay and under abusive conditions, knowing that they have nowhere else to go. An investigation conducted in Massachusetts that interviewed six restaurant workers found that restaurant workers without official work authorization, particularly those in back-of-house positions such as dishwashing, cleaning, and food prep, were provided sub-standard housing by their employers, ended up working with little pay, and were threatened with deportation, keeping them trapped in the work.⁸⁵ A study of labor trafficking in Chinese restaurants in the Netherlands also found that workers experienced multiple dependencies on their employer for housing, setting up and accessing bank accounts, and communication with the public and other services, resulting in an exploitative situation.⁸⁶

⁸³ [“Dismantling the kafala system and introducing a minimum wage mark new era for Qatar labour market.” ILO, 30 Aug 2020.](#)

[El-Dekmak, Nadine. “Reforming the Kafala System: Persistent Violations of the Rights of Migrant Domestic Workers and the Role of Private Recruitment Agencies.” Georgetown Journal of International Affairs, 21 Mar 2025.](#)

⁸⁴ [Scott, Sam; Craig, Gary; and Geddes, Alistair. *Experiences of Forced Labor in the UK Food Industry*. Joseph Rowntree Foundation. May 2012.](#)

⁸⁵ [McKim, Jenifer. “‘Working like a slave’: Why Human Trafficking in Restaurants is Underreported.” GBH, 17 Jan 2023.](#)

⁸⁶ [Van Meeteren, Masja and Ellen Wiering. “Labour Trafficking in Chinese Restaurants in the Netherlands and the Role of Dutch Immigration Policies. A Qualitative Analysis of Investigative Case Files.” *Crime, Law, and Social Change* 72: 107 – 124. 2019.](#)

3.4 State-Imposed Forced Labor

According to the ILO, “state-imposed forced labor refers to forms of forced labor imposed by state authorities, agents acting on behalf of state authorities, and organizations with authority similar to the state.”⁸⁷ It can include the abuse of compulsory prison labor, the abuse of military conscription, the exaction of work that is beyond normal civic responsibilities, and forced labor for the purpose of economic development.⁸⁸ Different types of state-imposed forced labor have been documented in the hospitality sector.

3.4.1 Illustrative Cases

It has been documented that workers from the Democratic People’s Republic of Korea who are sent by the government to work abroad—in numerous sectors, including the hospitality sector—face conditions amounting to forced labor and experience “excessive working hours, sometimes in hazardous conditions, with restricted pay for up to three years at a time, and without access to their passports.”⁸⁹

State-sponsored labor deployments can also present a forced labor risk. Cruise lines employing Cuban nationals through government-affiliated agencies have been the subject of scrutiny.⁹⁰ Reports suggest that these workers retained only a fraction of their wages, with the remainder remitted to the Cuban government. These arrangements reportedly limited workers’ ability to change employers or terminate contracts without incurring penalties, such as travel restrictions or future employment bans.¹⁰ There are also allegations of document withholding.⁹¹ Testimonies from former crew members describe long hours, exploitation, bullying, and feeling trapped, with those who do not return to Cuba facing potential eight-year prison sentences for “desertion” and being banned from entering Cuba, leading to separation from family.⁹²

⁸⁷ [“Hard to See Harder to Count: Handbook on Forced Labour Surveys.” ILO, 2024.](#)

⁸⁸ [“Hard to See Harder to Count: Handbook on Forced Labour Surveys.” ILO, 2024.](#)

⁸⁹ [U.S. Department of State. 2025 Trafficking in Persons Report.](#)

⁹⁰ [Badcock, J. “World’s Largest Cruise Liner Accused of Knowingly Hiring ‘Slave Labour’ Cubans.” *The Telegraph*, 26 Jan 2022.](#)

⁹¹ [Badcock, J. “World’s Largest Cruise Liner Accused of Knowingly Hiring ‘Slave Labour’ Cubans.” *The Telegraph*, 26 Jan 2022.](#)

⁹² [Badcock, J. “World’s Largest Cruise Liner Accused of Knowingly Hiring ‘Slave Labour’ Cubans.” *The Telegraph*, 26 Jan 2022.](#)

3.5 Sex Trafficking Associated with the Hospitality Sector

According to 2022 estimates from the ILO, there are 6.3 million people in sex trafficking around the world; the vast majority of these individuals—nearly four out of five—is female.⁹³ There is a strong link between the hospitality sector and sex trafficking. According to the organization Polaris, 80 percent of trafficking survivor survey respondents reported that commercial sex occurred at a hotel, and hotels and motels are often used as a business site to facilitate human trafficking in escort services.⁹⁴ Vulnerable individuals staying in hotels, such as families experiencing a financial crisis, individuals with substance dependencies, or migrants in financial need, experiencing language barriers, and/or with irregular (illegal) status, may also be taken advantage of by traffickers who frequent hotel locations with financial offers.⁹⁵ This phenomenon has been documented around the world; for example, according to the 2025 *Trafficking in Persons Report*, Bhutanese and Indian women work in commercial sex establishments that are part of the Bhutan-India border region’s growing hospitality and entertainment districts. These individuals are vulnerable to trafficking.⁹⁶

4. Recommendations: Due Diligence Steps to Address Risks

4.1 Conclusions

This report examined the forced labor risks in the operations and supply chains of companies supplying services, materials, and products across the hospitality sector.

The risks of exploitation of workers trace, in most cases, back to the inadequate due diligence processes of third-party services providers, labor agencies, and suppliers; and deceptive and exploitive recruitment processes that result in worker debt and compound other risk factors for migrant workers.

⁹³ [“Global Estimates of Modern Slavery: Forced Labour and Forced Marriage.” International Labour Organization. Sept 2022.](#)

⁹⁴ [Anthony, Brittany. “On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking – Hotels & Motels.” Polaris, July 2018.](#)

⁹⁵ [S., Emma. “Human Trafficking and U.S. Hotels.” The Exodus Road, 14 Mar 2024.](#)

⁹⁶ [U.S. Department of State. 2025 Trafficking in Persons Report.](#)

Companies should view the contents of this report as a starting point and seek to further develop their understanding of the specific weaknesses and risks in their supply chains at all tiers in order to implement dynamic/ongoing risk assessments and mitigation strategies.

The findings of this report largely point to potential gaps in companies' due diligence systems or approaches to managing risk. The following recommendations for addressing these potential process gaps offer hospitality entities practical guidance for implementing comprehensive measures to control forced labor risks and protect their operations and individuals who may be vulnerable to exploitation within their supply chains. Effective due diligence requires a systematic approach that integrates risk assessment, prevention and mitigation, capacity building, and monitoring. This involves developing comprehensive frameworks that can identify and address potential forced labor indicators across diverse operational contexts. The goal is not merely to achieve compliance but to create sustainable systems that protect vulnerable populations and prevent forced labor while maintaining operational efficiency and competitive advantage.

The [Responsible Sourcing Tool website](#) overall and the [Due Diligence Toolset](#) specifically provide technical tools to support the implementation of the following recommendations. The recommendations that follow and the toolset referenced align with the [UN Guiding Principles on Business and Human Rights](#) and the [OECD Due Diligence Guidance for Responsible Business Conduct](#). Tool 1 of the Base Due Diligence Toolset provides a model due diligence program for identifying potential risks of human trafficking within a supply chain, evaluating and prioritizing identified risks, implementing solutions, and monitoring and improving supplier performance over time.

4.2 Recommendations

4.2.1 Policy and Embedding Forced Labor Prevention Standards and Practices in Business Functions

- 4.2.1.1 Companies should include a clear prohibition against forced labor in their Codes of Conduct and supplier performance standards. (See Base Tool 2.) This should include the “employer pays” principle, which requires that all fees and expenses relating to the recruitment and placement of a worker are paid by the employer.
- 4.2.1.2 The policy should be clearly communicated to all business entities, including third-party service providers and labor agents, and included in business contracts. (See Base

Tool 5.) The contracts should also require that the policy be cascaded to the suppliers' suppliers.

4.2.1.3 Procurement staff should be formally assigned, trained, and supported to screen prospective suppliers, including third-party service providers and labor agents, for their commitment and capacity to meet the policy standards on avoiding forced labor. (See Base Tools 3, 7, and 8.) There should be clear consequences established for supplier performance on achieving the standards.

4.2.1.4 Review of a supplier's management of forced labor risks should be incorporated in regular supplier engagements, such as quarterly business reviews, quality audits, and other existing supplier management processes.

4.2.2 Risk Assessment and Prioritization

4.2.2.1 Conduct a combined supply chain mapping and forced labor risk assessment as a key first step in creating a targeted strategy for segmenting and prioritizing risks to address. (See Base Tool 6.) High-level risk factors to consider include characteristics of country of operation, product or production processes involved, and workforce demographics (e.g., prevalence of migrant workers). Other factors to consider include a company's ability to influence suppliers based on volume/spend and the degree of harm to people that practices may cause.

4.2.3 Needs Assessment and Capacity Building

4.2.3.1 Based on the results of a risk assessment, companies should conduct deep dives (e.g., targeted research, risk assessments, rapid appraisals, supplier assessments) to develop and implement action plans to address the underlying causes of identified risk or issues. The activities, which should be informed by clear objectives and measurable success indicators, may range widely from supplier training to engagement in multistakeholder initiatives where companies individually lack the leverage to drive positive changes in an operating environment (e.g., where economic or political factors are immovable in the immediate term).

4.2.4 Monitoring

- 4.2.4.1 Companies need to routinely evaluate whether they are implementing their due diligence processes as planned (e.g., new suppliers screened for forced labor risks, review of corrective action plans during regular supplier business reviews).
- 4.2.4.2 The effectiveness of due diligence activities should be tracked to ensure the desired impacts are on target and sustainable (e.g., worker-paid recruitment fees are avoided, foreign migrant workers are in full control of their identification documents, workers have access to remedy).