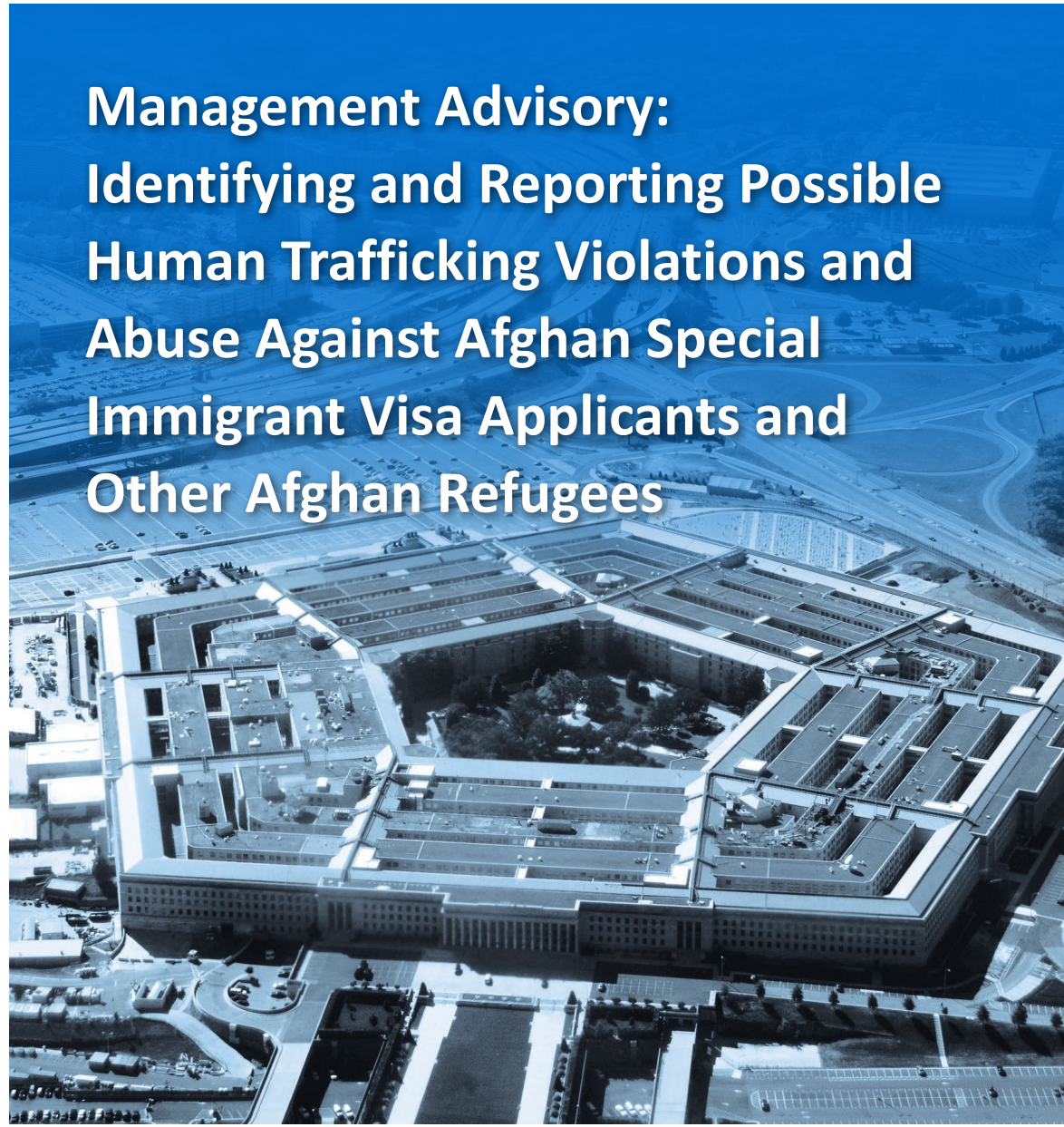




# INSPECTOR GENERAL

*U.S. Department of Defense*

SEPTEMBER 21, 2021



## **Management Advisory: Identifying and Reporting Possible Human Trafficking Violations and Abuse Against Afghan Special Immigrant Visa Applicants and Other Afghan Refugees**

INTEGRITY ★ INDEPENDENCE ★ EXCELLENCE





**INSPECTOR GENERAL  
DEPARTMENT OF DEFENSE  
4800 MARK CENTER DRIVE  
ALEXANDRIA, VIRGINIA 22350-1500**

September 21, 2021

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR POLICY  
COMMANDER, U.S. CENTRAL COMMAND  
COMMANDER, U.S. NORTHERN COMMAND  
COMMANDER, U.S. ARMY CENTRAL COMMAND  
DIRECTOR, JOINT STAFF

SUBJECT: Management Advisory: Identifying and Reporting Possible Human Trafficking Violations and Abuse Against Afghan Special Immigrant Visa Applicants and Other Afghan Refugees (Report No. DODIG-2021-132)

We are providing this report for information and use. This management advisory compiles information about identifying and reporting possible human trafficking violations among the Afghan refugee population being housed by the Department of Defense. The Under Secretary of Defense for Policy; Commander of U.S. Central Command; Commander of U.S. Northern Command; Commander of U.S. Army Central; and Director of the Joint Staff should read this report as a reminder of current policies related to the identification, reporting, and deterring of trafficking in persons and reporting options available to DoD personnel when human trafficking is suspected

This report contains no recommendations for action. We did not issue a draft report and no written response is required. If you have any questions, please contact [REDACTED]

*Bryan Clark*

Bryan T. Clark  
Acting Assistant Inspector General for  
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## Background

The purpose of this management advisory is to assist U.S. military, civilian, and contractor personnel responsible for the care and welfare of Afghan Special Immigrant Visa applicants and other Afghan refugees by explaining the indicators of potential human trafficking, the requirements to report suspected human trafficking, and the methods available for reporting possible human trafficking violations and abuses.

### ***Withdrawal of U.S. Forces from Afghanistan***

Since the Taliban took power in the Afghanistan capital of Kabul on August 15, 2021, the United States has evacuated roughly 117,000 people from Afghanistan, and the United States and its partners have relocated 124,000 refugees.<sup>1</sup> The DoD has authorized the use of facilities inside and outside of the United States to process and temporarily house up to 50,000 Afghan Special Immigration Visa applicants, their families, and other individuals considered to be at risk had they remained in Afghanistan. The expedited nature of the evacuation from Afghanistan, the instability of many of the refugees' circumstances, and the likelihood of overcrowding at the U.S. military installations leaves Afghan refugees particularly vulnerable to human traffickers, who often prey on victims with little or no social safety net.

## Human Trafficking Guidance, Threats, Indicators, and How to Respond

The DoD Combating Trafficking in Persons (CTIP) Program Management Office, DoD Instruction 2200.01, and other resources are available to DoD personnel to assist in identifying human trafficking violations and to provide guidance on how to respond to possible violations.

### ***Human Trafficking Guidance***

Trafficking in persons, also called human trafficking, is a crime and a human rights violation. According to the DoD CTIP Program Management Office, the three most common forms of trafficking in persons (TIP) that DoD personnel may encounter are:

- sex trafficking;
- labor trafficking (also called forced labor); and
- child soldiering.

National Security Presidential Directive (NSPD) 22 establishes the U.S. Government's "zero tolerance" policy for trafficking in persons and states, "departments and agencies shall

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<sup>1</sup> The White House, "Statement by President Joe Biden on the Evacuation Mission in Kabul," August 28, 2021. Department of State, "The United States Conducts Unprecedented Relocation Effort," September 6, 2021.

ensure that all of the appropriate offices within their jurisdiction are fully trained to carry out their responsibilities to combat trafficking.”<sup>2</sup> The DoD CTIP Program Management Office is responsible for overseeing, developing, and providing the tools necessary for implementing NSPD 22 within the DoD. DoD Instruction 2200.01, “Combating Trafficking in Persons,” which was updated in 2019, establishes CTIP policy, assigns responsibilities, and prescribes training requirements for DoD personnel.<sup>3</sup>

## ***Human Trafficking Threats***

In the U.S. State Department’s 2021 Trafficking in Persons Report, Afghanistan was classified as Tier 3, meaning it did not fully meet the minimum standards for the elimination of trafficking and was not making significant efforts to do so.<sup>4</sup> Refugees from Afghanistan may be more susceptible to trafficking because of the social norms in Afghanistan and the instability resulting from the hasty departure of refugees from Afghanistan. On September 7, 2021, UNICEF released a statement stating that they have registered approximately 300 unaccompanied children from Afghanistan. Unaccompanied children can be particularly vulnerable to trafficking. Additionally, the U.S. State Department’s 2021 Trafficking in Persons Report also found that some Afghan families force girls and women into marriage in return for payment. Girls and women who are sold into marriage are vulnerable to exploitation in sex trafficking and domestic servitude.<sup>5</sup> News outlets have reported, as recently as September 7, 2021, possible instances of child marriages and sexual abuse at multiple U.S. military installations housing Afghan refugees.

## ***Identifying Human Trafficking***

CTIP materials instruct all DoD personnel to be aware of the following signs that may indicate that human trafficking or abuse is occurring. These signs apply whether refugees are inside or outside of the United States.

- Physical/environmental indicators: Victims may have signs of physical abuse (for example, bruises, cuts, burns, or broken bones), not possess identification papers, live at or be confined to their worksite, be escorted or closely monitored at all times, be in debt bondage to their employer, suffer medical conditions such as serious communicable diseases, have injuries from violence or hazardous work conditions, be malnourished, or suffer from dehydration.
- Psychological and behavioral indicators of human trafficking include potential victims being fearful, submissive, anxious, nervous, depressed, dependent on others, emotionally abused, or lacking the ability to move freely.

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<sup>2</sup> The White House, National Security Presidential Directive/NSPD-22, “Combating Trafficking in Persons,” December 16, 2002.

<sup>3</sup> Department of Defense Instruction 2200.01, “Combating Trafficking in Persons (CTIP),” June 21, 2019.

<sup>4</sup> U.S. Department of State, “Afghanistan, 2021 Trafficking in Persons Report, Office to Monitor and Combat Trafficking in Persons,” 2021.

<sup>5</sup> U.S. Department of State, “Afghanistan, 2021 Trafficking in Persons Report, Office to Monitor and Combat Trafficking in Persons,” 2021.

Further information as to who is at risk, other TIP indicators, and how to respond to a TIP if suspected can be found in Figure 1.

Figure 1. Risk Factors, Indicators, and Reporting Methods for Suspected Trafficking in Persons

<p style="text-align: center;"><b>Who is at risk?</b></p> <p><b>Victims can be of any:</b></p> <ul style="list-style-type: none"> <li>• Race</li> <li>• Gender</li> <li>• Nationality</li> <li>• Social status</li> <li>• Economic status</li> <li>• Immigration status</li> </ul> <p><b>Vulnerable populations:</b></p> <ul style="list-style-type: none"> <li>• Undocumented migrants</li> <li>• Runaway and homeless youth</li> <li>• Women and children with limited resources</li> <li>• Oppressed social or cultural groups</li> <li>• People displaced by natural disaster or civil conflict</li> <li>• Victims of prior sexual or physical abuse</li> </ul>	<p style="text-align: center;"><b>What are some indicators of TIP?*</b></p> <p><b>Physical/Environmental indicators. Victims may:</b></p> <ul style="list-style-type: none"> <li>• Have signs of physical abuse (bruises, cuts, burns, broken bones)</li> <li>• Not possess identification papers</li> <li>• Live at or be confined to their worksite</li> <li>• Be escorted or closely monitored at all times</li> <li>• Be in debt bondage to employer</li> <li>• Suffer medical conditions such as serious communicable diseases, injuries from violence or hazardous work conditions, malnutrition, dehydration</li> </ul> <p><b>Psychological/Behavioral indicators. Victims may be:</b></p> <ul style="list-style-type: none"> <li>• Fearful</li> <li>• Submissive</li> <li>• Anxious</li> <li>• Nervous</li> <li>• Depressed</li> <li>• Dependent on others</li> <li>• Emotionally abused</li> <li>• Lacking ability to move freely</li> </ul> <p><small>*Indicators listed are not absolute signs of TIP, but when presenting with several are a sign of TIP.</small></p>	<p style="text-align: center;"><b>How to respond if TIP is suspected:</b></p> <p>If you suspect a TIP situation, do not get directly involved. <b>Report the situation to the appropriate authority immediately:</b></p> <p>Chain of Command DoD Inspector General Hotline <b>1-800-424-9098, or visit</b> <b><a href="http://www.dodig.mil/hotline/">http://www.dodig.mil/hotline/</a></b></p> <p>National Human Trafficking Resource Center <b>1-888-373-7888</b></p> <p>Local Law Enforcement</p> <p><b>Report and avoid</b> any establishments or persons that you believe may be involved in TIP.</p> <p><b>Never act alone</b>, you may want to help, but trafficking situations are dangerous.</p> <p style="text-align: center;"><b><a href="http://www.ctip.defense.gov">www.ctip.defense.gov</a></b></p>
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Source: CTIP.Defense.gov.

The DoD CTIP Program Management Office develops awareness materials that are distributed throughout the DoD and are available in multiple languages.

Figure 2. Examples of CTIP Awareness Posters

The figure displays three awareness posters. The first poster, 'STOP Human Trafficking', features the text 'There's no One face' and lists signs of abuse, including physical and psychological indicators. It provides reporting information for the Chain of Command, Local Law Enforcement, DoD Inspector General Hotline (1-800-424-9098), and National Human Trafficking Hotline (1-888-373-7888). The second poster, 'You Could Mean Freedom', shows a woman covering her mouth and lists indicators of TIP, such as physical abuse, lack of identification, and confinement to worksites. It also includes reporting instructions and the CTIP website. The third poster, 'Women, Peace and Security Act', highlights that 72% of detected trafficking victims are female and lists prevalent forms of trafficking in armed conflict, such as commercial sexual exploitation and forced labor. It includes a 'REPORT IT' section with contact information for the DoD Inspector General and the National Human Trafficking Hotline.

Source: CTIP.Defense.gov.

Of note, posters about CTIP, such as those illustrated in Figure 2, are available in Pashto and Dari, the languages predominantly spoken in Afghanistan, and should be posted in refugee centers. We encourage those responsible for housing refugees to post these materials in the appropriate language and in areas where they will be seen by the most individuals, both DoD and refugee. Additional DoD CTIP resources can be found at [ctip.defense.gov](https://ctip.defense.gov).

### ***Responding to Human Trafficking Suspicions***

Anyone, including Service members, civilian employees, indirect hires, contract personnel, and command sponsored dependents, who suspects that human trafficking is occurring or is a victim of human trafficking may report trafficking anonymously to the Department of Defense Office of Inspector General without fear of reprisal by calling the DoD Hotline at 800-424-9098 or visiting <http://www.dodig.mil/hotline>. Individuals may also call the National Human Trafficking Hotline at 888-373-7888 to report human trafficking or seek help if they are a victim.

In addition, any military or civilian member of the DoD who receives information or a report of human trafficking or abuse from refugees may report such information through their chain of command or directly to the DoD Hotline. DoD personnel may also report suspected trafficking to local law enforcement. Regardless of the reporting method, the DoD CTIP Program Management Office recommends that reports be made immediately. Personnel should not intervene if they suspect human trafficking or abuse, even if the goal is to help or protect victims, as such situations may be dangerous.

### **Resources Available for DoD Personnel**

The DoD CTIP Program Management Office has many resources available at <https://ctip.defense.gov/> to educate DoD personnel about trafficking issues and how to report suspected trafficking situations. In addition to the questions and indicators identified in Figure 1, DoD personnel can get more information about identifying possible trafficking in persons violations or abuse at [https://ctip.defense.gov/Portals/12/Trafficking\\_in\\_Persons\\_101\\_Fact\\_Sheet\\_2020.pdf](https://ctip.defense.gov/Portals/12/Trafficking_in_Persons_101_Fact_Sheet_2020.pdf) and <https://www.state.gov/policy-issues/human-trafficking/>. Additionally, the DoD CTIP Program Management Office has provided commanders with a “Commander’s Human Trafficking Checklist” to serve as a guideline for responding to a credible report of human trafficking. The checklist can be found at <https://ctip.defense.gov/Training/Leadership-Resource/Leadership-Toolkit/>.



# Appendix

## Scope and Methodology

The scope of our work included reviewing all relevant DoD criteria and information regarding CTIP from the DoD CTIP Program Management Office and other DoD and Federal resources, with a focus on identifying potential signs of human trafficking and the methods for reporting such possible activity. We spoke with DoD personnel who are responsible for receiving and investigating CTIP-related incidents received through the DoD Hotline, the Military Departments, and the combatant commands. We also consulted with the CTIP Program Management Office to identify past experience with the common CTIP violations and risk factors. We drafted this management advisory for all DoD personnel involved with assisting Afghan Special Immigrant Visa applicants and other Afghan refugees. This management advisory is intended to assist DoD personnel in identifying signs or indicators of possible trafficking in persons and types of trafficking or potential abuses, and provide guidance on how DoD personnel should report potential incidents if witnessed.

In addition, we analyzed the following three reports issued by the DoD OIG and the Government Accountability Office (GAO) between 2014 and 2021 that reviewed trafficking in persons issues.

### ***DoD OIG***

DoD OIG Report No. DODIG-2019-088, “Evaluation of DoD Efforts to Combat Trafficking in Persons in Kuwait,” June 11, 2019

This report evaluated whether DoD contracts in Kuwait complied with CTIP requirements and U.S. Federal Defense Supplement Acquisition Regulations related to human trafficking and whether DoD officials provided oversight of CTIP requirements in accordance with command responsibilities. The OIG found deficiencies in the implementation of these requirements.

DoD OIG Report No. DODIG-2014-079, “Evaluation of the Department of Defense Combating Trafficking in Persons Program,” June 16, 2014

This report reviewed a sample of DoD contracts for compliance with the “Trafficking Victims Protection Act of 2000,” (Title 22, U.S. Code, Chapter 78) as amended, summarized DoD CTIP investigative efforts, and reviewed DoD compliance with DoD Instruction 2200.01, “Combating Trafficking in Persons,” September 15, 2010,” and CTIP program performance. The report made four recommendations directing DoD components to assess their CTIP training as part of routine operations and providing clarification on reporting TIP incidents.

## **GAO**

GAO Report No. GAO-21-546, "Human Trafficking: DoD Should Address Weaknesses in Oversight of Contractors and Reporting of Investigations Related to Contracts," August 4, 2021

This report reviewed DoD regulations, instructions, and service contracts from 2015 to 2020 to determine whether the proper rules and procedures were in place to protect against possible human trafficking violations against foreign workers supporting DoD contracts. The report recommended DoD-wide corrections in training and changes in the processes used to monitor, report, and manage possible human trafficking violations occurring under DoD and service contracts.

# **Whistleblower Protection**

## **U.S. DEPARTMENT OF DEFENSE**

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### **For more information about DoD OIG reports or activities, please contact us:**

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