



# Manager & Owner Training Toolkit

## MINNESOTA LODGING SEX TRAFFICKING PREVENTION & RESPONSE TRAINING

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VIOLENCE PREVENTION PROGRAMS UNIT, SAFE HARBOR PROGRAM



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Managers & Owners Training Toolkit



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# Minnesota Lodging Sex Trafficking Prevention & Response Training

Human trafficking is a crime, a public health concern, and a violation of human rights that occurs in communities across Minnesota. Sexual exploitation and human trafficking in Minnesota are commonly overlooked, misidentified, and goes underreported. The Minnesota lodging industry is an important partner in preventing sex trafficking.

Minnesota law requires that hotel, motel, and short-term rental owners, managers, and employees receive training on how to detect and report this hidden crime. The Minnesota Department of Health (MDH), in partnership with Hospitality Minnesota, created the Minnesota Lodging Sex Trafficking Prevention and Response Training (The Minnesota Lodging Training Package) for hotels, motels, and short-term rentals to use. The Minnesota Lodging Training Package is approved by MDH and required for the majority of hotels, motels, and short-term rentals in Minnesota to satisfy statutory requirements.

## Why this training is important to you as managers and owners

Everyone has a role to play in preventing sex trafficking. The lodging industry plays a critical role since many traffickers and sex buyers exploit victims in hotels, motels, and short-term rentals. The hospitality industry has a unique opportunity to identify sex trafficking by recognizing signs and knowing how to respond.

Safety of staff and guests is also important. Staff can help keep everyone safe by being able to recognize trafficking within their establishments.

Sex trafficking is also bad for business. Sex trafficking in a hotel, motel or short-term rental can:

- Jeopardize the safety of your guests and employees
- Impact the community's trust in your establishment/brand
- Create potential civil and criminal liability associated with any damage as a result of sex trafficking
- Increase risk of denial of insurance coverage

The lodging industry of Minnesota has proven to be an effective partner in responding to sex trafficking by identifying and reporting cases that have been successfully prosecuted and brought justice for victims. We hope that each and every hotel establishment in Minnesota will join in the fight against sex trafficking.

## Required training for hotel, motel, and short-term rental staff

[Minnesota Statute 157.177 \(https://www.revisor.mn.gov/statutes/2018/cite/157.177?keyword\\_type=all&keyword=157.177\)](https://www.revisor.mn.gov/statutes/2018/cite/157.177?keyword_type=all&keyword=157.177) requires sex trafficking prevention training for all lodging establishments operating in Minnesota with a hotel/motel license designation. Hotels, motels, and short-term rentals should use the Minnesota Lodging Training Package to satisfy this law.

## Special note for short-term rentals

There is some confusion about whether or not short-term rentals such as VRBO, Airbnb, and Hometogo, are required under the statute to meet the requirements of the Sex Trafficking Prevention Training. **If your short-term rental is licensed by the Minnesota Department of Health Food, Pool and Lodging or a local county delegate, then you are required to provide the training.** If you have questions about this, please contact 651-201-5400.

## Hotels, motel, and short-term rentals operators are required to:

- Ensure all owners, managers, and employees who work on site receive training to identify sex trafficking in their establishments and know how to respond
- Post and maintain the approved poster with information on sex trafficking. The poster must be placed in a location visible to all staff
- Conduct an ongoing awareness campaign for employees

## Timing

- New employees must receive this training within 90 days of hire
- The Minnesota Lodging Training Package must be repeated annually
- MDH will update the training materials each year and the most recent version is on the Minnesota Department of Health e-learning platform. You will be notified through your regular licensing communications when the updates are available

## Who is covered

According to the law, every firm, person or corporation operating a hotel, motel or short-term rental in the state of Minnesota must train their onsite employees on sex trafficking prevention and response. Employees include the owner, manager and operator.

Exempt employees include:

- employees under 16 unless they clean rooms
- employees who work exclusively in a restaurant
- employees providing catering services
- employees who do not have direct contact with either guests or guest rooms

There are some exceptions for establishments, including those operating on tribal lands, or other type of lodging options without hotel/motel license designation. However, MDH strongly encourages all lodging establishments, regardless of their licensing designation, to use the Minnesota Lodging Training Package for training. It is the approved training package from MDH to satisfy the new statutory requirement. It provides useful tools as well as accurate and consistent Minnesota-specific information and resources. The Minnesota Lodging Training Package is available for use at no cost to any lodging establishment throughout Minnesota.

## Licensing requirements

This mandatory lodging training is tied to your licensing:

- Operators must keep a log or roster of all employees trained or make a note in employee personnel files. A sample training log is available at the end of this toolkit
- If training is not completed upon inspection the operator will have six months to comply
- Operators must keep the employee training records from inspection to inspection
- Any cost incurred in relation to fulfilling the statutory requirement is the responsibility of the licensee

## Posters

Each hotel, motel, and short-term rental operator must maintain a poster, written or approved by the MDH Commissioner.

MDH has provided a poster set that establishments may use to comply with this requirement.

There are five posters available for operators to post in their establishments. **The legislation requires that operators post and maintain the “back of house” poster in a place readily accessible to each employee who works on site.** For short-term rentals, the poster can be displayed on the inside of the door to the cleaning supply closet. The other posters are options that would help you satisfy the ongoing awareness campaign. We recommend that owners/managers have the posters printed and laminated at a print shop for aesthetic and durability purposes.

It is recommended that the other four posters are posted in relevant staff work areas. These posters are: Housekeeping; Maintenance; Restaurant/Bar; Front Desk/Concierge/Lobby; Security.

## Ongoing awareness campaign

Hotels, motels, and short-term rentals are required to conduct an ongoing awareness campaign for employees that address the following components:

- what sex trafficking is in order to raise awareness
- how to recognize potential victims of sex trafficking
- how to identify activities commonly associated with sex trafficking
- effective responses to trafficking situations including, but not limited to, how to report suspected sex trafficking to proper law enforcement officials

Hotels, motels, and short-term rentals can comply with the ongoing awareness campaign requirement by:

- posting the non-required posters in relevant staff areas
- connecting with a Safe Harbor Regional Navigator and local law enforcement for additional support
- draft a response protocol that is accessible and that all employees understand

## What training does and does not count toward compliance

The Minnesota Lodging Training Package is the approved training package and is required for the majority of hotels, motels, and short-term rentals in Minnesota to satisfy the training mandate. It provides the Minnesota context and statewide resource information which may be different from national trainings or trainings from other states.

If a hotel is required to use their brand’s sex trafficking prevention training materials, you must submit a request for approval to MDH Safe Harbor Program for review to see if it will satisfy part of Minnesota’s statutory requirements. This approval must be sought prior to the delivery of the training. **In the event that those materials are approved, the hotel is only exempt from one portion of the Minnesota Hotel Training Package. The other requirements still apply.**

To submit your training materials, please send an email to: [health.safeharbor@state.mn.us](mailto:health.safeharbor@state.mn.us)

## Reporting in good faith

### For employees:

Follow your lodging establishment’s protocol and report what you see or hear in good faith. Remember that any one possible indicator of trafficking alone may not indicate sex trafficking, but in combination, they should raise suspicion that trafficking may be occurring in your hotel, motel, or short-term rental. It is not up to you to make that final determination – your role is to inform your management and the authorities about possible activities that require further investigation. Neither you nor your employer will be subject to civil liability when a report is made in good faith. You will not get in trouble for contacting law enforcement if you have reason to believe a trafficking situation is happening.

### For managers and owners:

Make sure you have a protocol for reporting suspected trafficking and that your employees know how to follow it. Encourage employees to report but remember that the presence of possible indicators does not necessarily mean sex trafficking is occurring in your establishment. And likewise, the absence of possible indicators does not mean that trafficking is not happening in your establishment. Reassure employees that if they report in good faith neither the establishment nor the reporting employee will be subject to civil liability. It is important for you to emphasize with your employees that they will not get in trouble for contacting law enforcement if they have reason to believe a trafficking situation is happening.

## The Minnesota Lodging Training Package

The Minnesota Lodging Training Package provides the essential information about recognizing and responding to sex trafficking.

*\*Please note that the training includes information about human trafficking and the experiences of survivors. Some employees may find this material upsetting. Managers on duty should allow employees to have a few minutes to process their feelings after viewing the training.*

The Minnesota Lodging Training Package includes the following required items:

- **Managers & Owners Training Toolkit** – The document you are currently reading
- **Minnesota Training Virtual Presentation** – A three-part video with guided practice
  - Part 1: Introduction

- Part 2: Embedded Sub-Video
- Part 3: Core information
- **Training Companion Guide** This training companion guide for all trainees is to be used as a resource for employees. Managers can download and print a few copies of the Training Companion Guide and have on hand for employees to access while they view the training. Employees will also be able to access the Guide when they sign on to the MDH e-learning Platform. It is not required to print a hard copy of the Training Companion for every employee.
- **Poster Set** This set includes five posters: housekeeping/maintenance/room service; front desk/concierge/lobby; restaurant/bar; security; and for back of house. Managers need to download and print a copy of the Back of House Poster and post it where staff can see it. You are encouraged to print and display the additional posters, which include specific information for different staff positions. The posters are best viewed when printed in color.

## Access to training materials for managers and owners

In 2023, the lodging industry training materials were moved to the MDH e-learning platform. The virtual training presentation will take approximately 45 to 50 minutes for viewing.

To access the required training materials go to:

[Minnesota Lodging Sex Trafficking Prevention and Response Training](https://www.health.state.mn.us/communities/humantrafficking/training/hoteltrafficking.html)  
(<https://www.health.state.mn.us/communities/humantrafficking/training/hoteltrafficking.html>)

You will see a link for **Managers/Owners**. *Please note that there are separate links for lodging staff to access the English, Somali, Hmong or Spanish training versions.*

Upon entering e-learning, you will be required to create a login account. You will only need to do this one time. Be sure to save your password somewhere. Once you have logged in you will then complete a brief pre-training survey prior to accessing the virtual training package. The survey will ask you a few questions about your lodging establishment, your role, and your current preparedness level around sex trafficking identification and response. Once you have completed the questions, you will be directed to the Minnesota Lodging Sex Trafficking Prevention and Response Training Package.

You will then have access to the virtual training presentation. **To access this Managers/Owners Toolkit, the posters set, and the Training Companion click on the “Resources” tab on the overview tool bar.**

At the end of the virtual training package you will be directed to complete a training evaluation survey. You will receive a certificate of completion sent to your email.

We recommend that managers and owners download and print a copy of the Managers/Owners Toolkit and keep it somewhere where it will be easily accessible for Managers on Duty. We also recommend that you download the Training Companion and have a couple of copies available for staff as a resource when they access the training.

## Instructions for employees to access training materials

Just like managers and owners, each employee needs to set up their own account on the MDH e-learning platform, this means that they will need their own email, either a personal or a work email to access MDH e-learning.

**The following are the instructions you can provide employees for accessing the training package:**

To access the required training materials go to: [Minnesota Lodging Sex Trafficking Prevention and Response Training](https://www.health.state.mn.us/communities/humantrafficking/training/hoteltrafficking.html)

(<https://www.health.state.mn.us/communities/humantrafficking/training/hoteltrafficking.html>).

Click on the link for **Lodging Employees** and then click on the training language of choice, this will take you to the MDH e-learning platform. There are four different links for this training: English, Somali, Hmong and Spanish. Managers can help employees access the language that the employee is most comfortable viewing. You will need to set up an account on the e-learning platform. You will need your own email address, either a personal or a work email to access the lodging training package.

You will then be able access the virtual training presentation. **To access the Training Companion Guide and the poster set click on the “Resources” tab that is on the overview toolbar.** Once you have completed the training, you will be directed to complete an online training evaluation survey. You will receive an email of completion and certificate of completion is available in the transcript portion of the e-learning platform.

It is advised that owners or management let employees know that you are willing to discuss any questions or concerns employees may have related to the training. Another option is to connect the employee/s with the Regional Navigator in your area to answer any questions or concerns. As mentioned previously, the content of the training may be challenging for some, which means they may need a few moments for emotional regulation after the training.

If you have questions or concerns regarding the training materials, please direct them to MDH Safe Harbor: [health.safeharbor@state.mn.us](mailto:health.safeharbor@state.mn.us).

## Safe Harbor assistance resources

### Safe Harbor

There is a strong statewide network of resources in Minnesota to help hotels, motels, and short-term rentals respond to trafficking. The [Safe Harbor Program](https://www.health.state.mn.us/communities/humantrafficking/safeharbor/index.html) (<https://www.health.state.mn.us/communities/humantrafficking/safeharbor/index.html>) provides a coordinated approach to addressing sexual exploitation and human trafficking. By working across state agencies and with community partners, Safe Harbor provides services, housing, and funding to support sexually exploited youth and adults to prevent sex and labor trafficking.

Safe Harbor’s network of [Regional Navigators](https://www.health.state.mn.us/communities/humantrafficking/safeharbor/navigators.html) (<https://www.health.state.mn.us/communities/humantrafficking/safeharbor/navigators.html>)



provides a main point of contact for sexually exploited youth and adults, system professionals, concerned individuals, and businesses throughout Minnesota.

The lodging industry does not need to address sex trafficking alone. Safe Harbor can help support hotels, motels, and short-term rentals throughout the state. We are encouraging hotel/motel establishments to intentionally connect with the Safe Harbor Regional Navigators in their region.

If you have questions about this training or about Safe Harbor, please send inquiries to [health.safeharbor@state.mn.us](mailto:health.safeharbor@state.mn.us)

## **Minnesota local law enforcement and law enforcement sex trafficking task forces**

We encourage each lodging establishment to develop and maintain a collaborative relationship with their local law enforcement agency prior to a sex trafficking situation arising. Please use your local law enforcement agency as a resource when questions arise.

In addition to local law enforcement, the Minnesota Bureau of Criminal Apprehension (BCA) operates the statewide Human Trafficking Investigators Task Force, if interested in connecting with this task force send an email to the BCA Tipline: [bca.tips@state.mn.us](mailto:bca.tips@state.mn.us).

The BCA has 24 hour/7 days a week tipline to report by phone possible trafficking situations: 877-996-6222.

There are also three regional sex trafficking investigations law enforcement task forces:

- Tribes **United against Sex Trafficking (TRUST)**, Fond du Lac Band of Lake Superior Chippewa, Police Department
- Central MN Human Trafficking Task Force, Stearns County Attorney's Office
- East Metro Sex Trafficking Task Force, Washington County Sheriff's Department

## **Lodging preparedness and response protocol**

We are providing the lodging industry with the following resource information to aid managers and owners to develop their establishment's response policies and protocols.

### **Preparedness checklist**

- Develop a protocol for response, to include an after hours call list for notification
- Train all new employees per Minnesota legislation
- Require vehicle information and photo ID at check-in
- Do not rent by the hour
- Strategically place security cameras throughout your establishment, particularly in the parking lot and front desk areas
- Establish contacts with local law enforcement trained on human trafficking
- Change Wi-Fi passwords in rooms, bars, and restaurants regularly

- Limit lodging entrance to one staffed area at night. Require that employees actively greet and speak with all guests and visitors
- Require that all visitors' names, guest names (all guests staying in a room), and arrival times are documented
- Consider a policy requiring that guests meet and escort their visitors at night
- Consider implementing a no cash policy
- Be particularly wary of cash payments during sporting events or conventions since they may attract criminal activity
- Require that employees run a report of all rooms paid in cash. File the report daily

#### **Train employees:**

- Be wary of requests for rooms close to exits
- Actively greet and speak with all visitors arriving at night. Log the guest's name, visitor's name, room number, arrival time and departure time. Watch for a trend of visitors to the same room. Report unusual activity to the manager on duty
- Be aware of guests who check-in then go back to their car or the street to bring in children/youth
- Be aware of children/youth/adults dressed in ways that don't fit with their age, the weather conditions or the setting – but keep in mind trafficking victims can dress in unremarkable clothing as well such as sweatshirts and sweatpants
- Take the time to verify that the photo IDs at check-in are actually the guests
- Document unusual activities and communicate your concerns to the manager on duty

(Adapted from the ECPAT-USA Anti-Trafficking Hotel Checklist)

### **Lodging sex trafficking prevention and response protocol**

Each establishment will have unique components in its response protocols. You may already have protocols for responding to security incidents. Consider how best to integrate response to sex trafficking into existing protocols. Remember, sex trafficking can happen in any Minnesota lodging establishment, so it is important to be prepared ahead of time with an effective response that all employees can follow.

Below are suggestions for developing sex-trafficking-specific protocol for your property.

- Connecting with local law enforcement and your Safe Harbor Regional Navigator is the best place to start for understanding what your community response to sex trafficking looks like.
- An effective protocol response does not need to be complicated – it should be easy to follow for all employees.
- Ensure that all employees, including managers, understand who the first priority will be to contact, and any back-up contacts if needed, including who will contact 911 and under what circumstances.
- Specify what actions can or cannot be taken, such as avoiding intervention for the safety of the employee and others.
- For managers, in particular, outline how to provide helpful information to law enforcement such as name(s) of guest(s) if available, type of incident prompting the call, descriptive information of the person(s) involved, license plate numbers, name(s) of staff who witnessed suspicious activity, existence of video surveillance recordings on your property, etc.

- Ensure that employees understand that if they are witnesses, they may need to speak with law enforcement. Remind employees that a report made in good faith will not subject the employee to any legal risk or employment consequence.
- The protocol should include post-incident support for any employees, including managers, who were involved. If an incident was upsetting, an employee may need someone to talk to about what happened and how they feel about it. Regional Navigators can be helpful in identifying local resources and services.

A good time to review your protocol response with employees is when you have employees take the online annual sex trafficking prevention and response training. In addition, ensure that protocols are posted in visible places and that they are updated regularly with contact information for local law enforcement and the regional navigator. If an incident occurs, make time for debriefing the incident with your staff as well as law enforcement and other sources to determine how well the protocol worked, and what didn't work, revise as necessary.

## **Thank you for your participation and for your leadership**

Thank you for taking part in the Minnesota Lodging Sex Trafficking Prevention Training.

As an owner/manager, you are a key player in addressing sex trafficking in Minnesota, not only in your establishment but also in your community. Together, we can work to prevent sex trafficking and make Minnesota safer for all.

If you have questions, please send inquiries to [health.safeharbor@state.mn.us](mailto:health.safeharbor@state.mn.us).

**Sources for the development of this toolkit:** ECPAT-USA, American Hotel & Lodging Educational Institute (AHLEI), BEST Alliance (Businesses Ending Slavery & Trafficking), Blue Campaign, Polaris Project, and the Minnesota Department of Health Safe Harbor Program.