

Communication from Public

Name: Coalition to Abolish Slavery and Trafficking
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Council File No: 14-1371-S13
Comments for Public Posting: Please see the attached letter of support.



COALITION TO
ABOLISH SLAVERY
& TRAFFICKING

October 22th, 2024

Re: [Council File: 14-1371-S13](#)

Support for “Los Angeles Living Wage Ordinance (LWO) / Los Angeles Hotel Worker Minimum Wage Ordinance (LA HWMO) / Wage Increase / Health Care Credit / Public Housekeeping Training / Amendments”

Dear Economic, Community Development and Jobs Committee members,

The Coalition to Abolish Slavery and Trafficking (Cast) is writing in strong **support** of the proposed Fair Wage Ordinance and to offer our recommendations for implementation.

Cast is one of the largest comprehensive service providers in the U.S., working to put an end to human trafficking through holistic services for survivors and a platform to advocate for groundbreaking policies and legislation. Established in 1998 in Los Angeles, Cast has supported thousands of survivors through every phase of their journey from counseling to legal resources, housing, educational and leadership training, and mentorship. Through these programs, Cast has helped empower survivors to become leading voices in shaping anti-trafficking policy and public awareness.

Poverty and housing insecurity are key risk factors for human trafficking. Worker’s whose wages do not keep up with inflation and the rising cost of housing are significantly more vulnerable to exploitation. **Increased wages, access to healthcare, and workplace protections are a critical form of anti-trafficking prevention.** This is why Cast supports the motion and its intent to:

- Raise the hourly wage to \$25 in 2023, and by \$1 every year thereafter, to reach \$30 an hour by 2028;
- Adjust the health care credit to meet the average cost of healthcare coverage, add minimum health benefit requirements including family coverage, and require transparency around health care payments;
- Ensure that workers receive all eligible paid time off and sick days under the LWO, LA HWMO, and the Citywide Minimum Wage;

- Add a Public Housekeeping Training requirement to the LA HWMO, similar to the ordinances in Santa Monica and West Hollywood; and • Clarify that enforcement of the LWO and LA HWMO ordinances shall be conducted by the City's Office of Wage Standards.
- Limit subcontracting in hotel housekeeping, except in emergency circumstances

Cast utilizes a public health and human rights approach to anti-trafficking that seeks to address the root causes of exploitation and build the political and economic power of impacted communities. As a learning organization with 25 years of experience in human trafficking services and advocacy, Cast offers the following considerations and recommendations:

Large Event Anti-Trafficking Advocacy:

Cast applauds the City Council for engaging in advocacy around the World Cup and Olympics that centers the rights and protections of vulnerable workers, without perpetuating harmful narratives. There is pervasive myth that large events such as these have a direct correlation to an increase in sex trafficking despite no conclusive supportive research.¹²³⁴ The perpetuation of this myth often leads to tactics that increase the criminalization of survivors via increased contact with law enforcement through stings, raids, and operations. These tactics often result in the arrest of human trafficking survivors and workers which can make community members reluctant to access services and leave survivors with criminal records that create insurmountable barriers to accessing safe housing, employment, benefits, and immigration. These tactics are not aligned with federal recommendations for law enforcement⁵ and evidence shows that they do not prevent human trafficking, rarely result in the prosecution of traffickers, and often re-traumatize survivors⁶.

¹ (2011). WHAT'S THE COST OF A RUMOUR? A guide to sorting out the myths and the facts about sporting events and trafficking. Global Alliance Against Traffic in Women.

² Martin, L., Dr., & A. H., Dr. (2017). "Sex Trafficking and the 2018 Super Bowl in Minneapolis: A Research Brief". University of Minnesota.

³ L Martin and A Hill, 'Debunking the Myth of "Super Bowl Sex Trafficking": Media hype or evidenced-based coverage', *Anti-Trafficking Review*, issue 13, 2019, pp. 13-29, <https://doi.org/10.14197/atr.201219132>.

⁴ Deering, K., & Shannon, K. H. (2012). "Fears of an influx of sex workers to major sporting events are unfounded". British Medical Journal Publishing Group.

⁵ Notice Clarifies Law Enforcement Use of Victim Assistance Funding - Freedom Network USA: <https://freedomnetworkusa.org/2018/02/28/notice-clarifies-law-enforcement-use-victim-assistance-funding/>

⁶ (2020). Over-Policing Sex Trafficking. How U.S. Law Enforcement Should Reform Operations. *International Human Rights Clinic USC Gould School of Law*. <https://humanrightsclinic.usc.edu/2021/11/15/over-policing-sex-trafficking-how-u-s-law-enforcement-should-reform-operations/>

Additionally, the Fair Wage Ordinance is aligned with the Los Angeles Board of Supervisors motion “Reimagining a Public Health Approach to Human Trafficking”⁷ passed in October of 2023. Supervisor Hilda Solis’ analysis of human trafficking efforts in Los Angeles specifically addressed the Superbowl myth and **called for allocation of resources year-round:**

*“Also looking forward, with two upcoming large-scale international sporting events in 2026 and 2028 **the persistent belief that large sporting events cause significant increases in sex trafficking will again become a topic of discussion and concern.** Indeed, in the lead up to the last Super Bowl in Los Angeles, law enforcement engaged in the planning and implementation of programs designed to combat the feared increase. Contrary to this belief, however, the evidence appears to show that sex trafficking does not increase around large sporting events. Moreover, human trafficking in the Los Angeles region is already a significant problem that continues notwithstanding any large-scale sporting events. Many antitrafficking advocates have decried the focus on one-time events, rather than viewing **trafficking as an ongoing issue that requires unmitigated focus and resources.** The nature of the issue of human trafficking and these upcoming sporting events requires intentional scrutiny so that resources, if needed, can be allocated based on evidence.”*

The Fair Wage Ordinance is in line with national recommendations to increase the rights, protections, resources, and education of workers who will be most impacted during large events.

Public Housekeeping Training Considerations:

Nationally, Cast is recognized for its comprehensive training and technical assistance (TTA) program, established in 2015 to strengthen the capacity of providers across the U.S. to serve survivors of all forms of trafficking in persons by providing live training (in-person and virtual) and individualized technical assistance. In addition, since 2021, Cast has been the training agency on commercially sexually exploited children (CSEC) and human trafficking for the County’s Department of Children and Family Services and Probation Department. Cast’s training and technical assistance programs are informed by the experiences of survivors served by Cast, as well as the insights of its practitioners.

⁷ Solis, H. (2023). Reimagining Los Angeles County’s Approach to Human Trafficking. Los Angeles County Board of Supervisors.

Mandatory human trafficking training within various labor sectors is both a critical step in anti-trafficking prevention and also has the potential to contribute to the spread of misinformation and the criminalization of survivors. In order to prevent this, Cast offers the following recommendations:

Cast recommends that the Public Housekeeping Training references Cast’s “Human Trafficking Defined for Social Services Providers” course materials. Any mandatory training on human trafficking needs to:

1. Cover the federal definition for “severe forms of trafficking,” as defined by the Trafficking Victims Protection Act (TVPA), which defines both sex and labor trafficking and differentiates sex trafficking from consensual sex work
2. Include discussion on individual, interpersonal, community, and systemic vulnerability and risk factors for trafficking, as evident in models such as the Centers for Disease Control Social-Ecological Model
3. Review the rights and available services for survivors of trafficking

Cast recommends that the Public Housekeeping Training limit the potential for criminalization of survivors and workers and ensure connection to community-based services by:

1. Limiting provisions that require workers and establishments to utilize mandatory, non-consensual law enforcement intervention for potential survivors in line with recommendations from leaders with lived experience⁸.
2. Utilize Cast’s 24/7 hotline number as a reporting resource in line with current state legislation⁹ and other measures to ensure potential survivors are connected to critical social and legal services.

Cast urges you to vote in favor of the Fair Wage Ordinance to build a Los Angeles where workers are well-resourced and engaged in the collective fight against human trafficking. Please do not hesitate to reach out with any questions. Thank you.

⁸ National Survivor Network (2023) <https://nationalsurvivornetwork.org/wp-content/uploads/2023/03/2023-A-victim-centered-hotline.pdf>

⁹ Civil Code Section 52.6 Posting of Public Notices Regarding Slavery & Human Trafficking

Sincerely,

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Coalition to Abolish Slavery and Trafficking

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