

Human trafficking in the hotel industry in the Netherlands: the fine line between service, responsibility and liability

Erwin van der Graaf

Accor Hotels, The Netherlands

Email: erwin.vandergraaf@accor.com

Human trafficking is the fastest growing form of organised crime and the biggest source of income for criminals in Europe. Within the prostitution sector, there is a shift towards less visible forms such as hotel prostitution. About half of all prostitutes working in the Netherlands are victims of human trafficking and sexual exploitation. The hotel industry runs the risk of liability and reputational damage, and has a moral responsibility to prevent and combat human trafficking in hotels. This paper examines the risks of human trafficking for the hotel industry from three different perspectives. The first is the marketing perspective: what commercial risks exist for hotels in relation to human trafficking? The second is the legal perspective: when does a hotel bear criminal liability in relation to human trafficking? The third is the ethical perspective: where does the moral responsibility of a hotel in relation to human trafficking begin and end? In conclusion, the paper describes risk mitigation measures already taken by the hotel industry, as well as the public/private collaboration between the Netherlands Public Prosecution Service (Openbaar Ministerie), the Dutch Criminal Investigation Department (Nationale Recherche), and the hotel industry to prevent and combat human trafficking in the Dutch hotel industry.

Keywords: forced prostitution, hotel industry, human trafficking, moral responsibility, public/private collaboration, sexual exploitation

Introduction

In 2013, it had been 150 years since the Netherlands banned slavery. Yet slavery still exists in the Netherlands – modern slavery, better known as human trafficking. Beijer (2010, p. 1) defines human trafficking as follows: “Human trafficking is a complex and multifaceted phenomenon. What is characteristic of human trafficking is that it focuses on exploitation, which may involve sexual or non-sexual exploitation”. A recent report presented by the Committee for Migration, Refugees and Displaced Persons of the Parliamentary Assembly of the Council of Europe states that human trafficking is still on the rise, can be considered the fastest growing form of organised crime, and is the biggest source of income for (transnationally operating) criminals in Europe (National Rapporteur on Trafficking of Human Beings and Sexual Violence against Children [NRM], 2013).

There are no good data on the scope of human trafficking in the Netherlands. It is only known how many cases come to the attention of the police and social and welfare organisations. In 2012, there were 1 711 registered victims of human trafficking in the Netherlands, of which 1 455 involved cases of sexual exploitation and 256 cases of non-sexual exploitation. It is assumed that at any given time in the Netherlands, some 30 000 persons are in a position involving criminal exploitation – 21 000 cases of non-sexual exploitation and 9 000 cases of sexual exploitation. Neither are there precise data about the number of prostitutes working in the Netherlands. It is estimated that there are approximately 20 000 prostitutes. Combining these assumptions, we can

state that out of approximately 20 000 prostitutes in the Netherlands, 9 000 are exploited – in other words, nearly half of all prostitutes working in the Netherlands. “The prostitution industry seems to be shifting from more visible forms, such as window prostitution and brothels, to less visible forms like escort, hotel and home prostitution” (NRM, 2013, p. 56).

So a situation is emerging in which organised crime-driven human trafficking is growing rapidly, on the one hand, and prostitution is exploited from hotels more frequently, on the other, and nearly half of all prostitutes are being exploited and are victims of human trafficking. That brings us to the role, responsibility and importance of the hotel industry in relation to human trafficking.

The NRM’s ninth report talks of stimulating awareness of aware and unaware facilitators of human trafficking. The Netherlands Public Prosecution Service (PPS) believes that hotels were insufficiently involved in combating human trafficking. The Netherlands Criminal Investigation Department (CID) initiated a campaign in which actresses were deployed as prostitutes at three hotels in Amsterdam, testing the alertness of hotel personnel in responding to signals of human trafficking. The observations of the PPS and CID based on this campaign confirmed the idea that hotel personnel are insufficiently aware of the signals of human trafficking in hotels and therefore do not respond adequately. The results of the campaign were filmed and broadcast on the television show *Nieuwsuur* in 2012. It led to significant (negative) media attention for the hotels in question and the hotel industry in general.

In principle, a hotel is a company that focuses on service to guests and customers against payment. It is considered

inappropriate to ask guests questions that may be too critical or personal, since hotels aim to respect the privacy of their guests to the greatest possible extent. This serviceable and discrete basic attitude means that hotels may be misused, without their knowledge and without wanting to, as a location for human trafficking.

As such, the question arises, what are the risks for hotels when they become involved in human trafficking? This paper aims to reveal the risks of human trafficking for hotels from three different perspectives. The first is the marketing perspective: what commercial risks exist for hotels in relation to human trafficking? The second is the legal perspective: when does a hotel bear criminal liability in relation to human trafficking? The third is the ethical perspective: where does the moral responsibility of a hotel in relation to human trafficking begin and end? The paper also aims to explain measures that help limit the risks of human trafficking – what risk mitigation measures has the hotel industry already taken to prevent human trafficking? The scope of this paper is limited to sexual exploitation of human trafficking victims in the Dutch hotel industry. Labour exploitation of human trafficking victims in the hotel industry is not covered in this study, nor is sexual exploitation of human trafficking victims in locations other than hotels. Subsequent to the 2012 PPS and CID campaign that deployed actresses in hotels as so-called prostitutes, a public/private collaboration emerged between all of the chain partners. The Dutch PPS, the CID, and the Koninklijke Horeca Nederland (KHN) hotel industry association joined forces to prevent and combat human trafficking in the hotel industry.

Human trafficking

The literature and media expressions relating to human trafficking use a range of terms that may seem confusing, overlapping or contradictory. I have defined these key terms below so their meaning in this paper is unambiguous. The definition of these key terms is given in the Dutch context. The term “human trafficking” is described comprehensively in Article 273f of the Dutch Criminal Code. This Article defines a range of activities as criminal offences when they aim to exploit, sexually or otherwise, other persons, and profit from the exploited situation of the other person. The description of human trafficking as a criminal offence is derived from the definition of *trafficking in persons* in the Palermo Protocol from 2000. It consists of three parts, i.e. an action (recruitment, transportation, etc.), the means used to achieve this (forms of coercion), and the intention of exploitation (or removal of a person’s organs). In all cases, exploitation covers sexual and labour exploitation, including coerced or required service (Rijken et al., 2013).

Exploitation

Exploitation is one of the characteristics of human trafficking and may be sexual or non-sexual.

Legal prostitution

The ban on brothels was repealed in the Netherlands on 1 October 2000. Prostitution is legal unless it is forbidden or requires a permit on the basis of an *Algemeen Plaatselijke Verordening* (APV or Code of Ordinances), the local municipal regulations. Prostitution for which no rules exist at the legal

level, i.e. for which no permit is required, cannot constitute a violation of the regulations and as such cannot be illegal. Prostitutes must be at least 18 years of age. As a result, the possibility remains that exploitation and human trafficking occur in legal prostitution.

Illegal prostitution

Illegal prostitution is prostitution that does not comply with the local regulations. As such, illegal prostitution does not necessarily equal exploitation or human trafficking.

Conditional intent

Conditional intent (Latin: *dolus eventualis*), also called *kansopzet* in Dutch, is intent with an awareness of the possibilities. The term comes from the Dutch Criminal Code and is a somewhat misleading term. In fact, there is nothing conditional about the intent. The perpetrator knows that their action *may* have certain consequences (awareness of the possibilities), but is willing to accept them. They are able to reduce the chances to zero, but refrain from doing so because they want to engage in the behaviour. Conditional intent is the lower limit of intent. Other forms of intent are awareness of necessity (*noodzakelijkheidbewustzijn*) and pure intent (*zuivere opzet*). (Wikipedia, n.d.).

Hotel risks

Jeurissen (2009, p. 117) says the following about reputation:

A company that misbehaves must be prepared for a consumer boycott and decreasing turnover due to loss of reputation. Many companies have experienced that there can be a public outcry if they do not, in the eyes of the public, honour their social responsibilities. And when that outcry results in a consumer boycott, it hits the company where it hurts: its sales. This is definitely the case for companies who use their name as their brand name.

This quote highlights three major risks for the hotel industry in relation to human trafficking. In the first place, when a hotel facilitates human trafficking, the public may see it as condemnable behaviour, and interpret it as failing to comply with its social responsibility. In the second place, this may lead to a consumer boycott that has a direct impact on the hotel’s turnover. And in the third place, there is an additional risk for hotels: many hotels are part of a hotel group and use the group’s name as their brand name. Loss of reputation suffered by a hotel that is part of a group can therefore cause loss of reputation for the entire chain.

In its report *De opmars van hotelketens: Nederlands ketenhotelaanbod in kaart gebracht* (“The rise of hotel groups: mapping the Dutch hotel group offering”), Horwath HTL (2013) states that the group percentage of Dutch hotels grew from 61 to 65% between 2011 and 2013. It is expected that hotel groups will continue to strengthen their grip on the Dutch market in the coming years. It can therefore be said that loss of reputation can lead to commercial damage for a hotel. However, an interesting question is whether condemnable behaviour on a company’s part does automatically lead to loss of reputation. A recent study (Reuber & Fischer, 2010) developed a model that demonstrates what factors cause condemnable behaviour to be translated to loss of reputation.

The study defines reputation as the general attractiveness of a company to its external stakeholders.

It mentions three determining factors in any loss of reputation. In the first place, these are “action-related factors”:

- Presumed control of the situation (the more control a company has over a situation, the greater the reputational damage)
- Presumed certainty (the more certain that a situation actually occurred, the greater the reputational damage)
- Presumed deviation from the common standards in the industry (the more the company deviates from what is considered normal in the industry, the greater the reputational damage)
- Presumed risk for stakeholders (the greater the risk to stakeholders, the greater the reputational damage)

The second is “stakeholder motivation”. The closer the relationship or dependency between company and stakeholder, the more it will reduce any loss of reputation in the eyes of the stakeholder. The third is “media attention”. Media attention must be primarily negative, and then even be repeated frequently, before it has a negative impact on the perception of external stakeholders.

When a hotel suffers loss of reputation, there is a commercial risk of losing revenue. And reputational damage is an even bigger risk for hotel groups. In view of the rising group percentage in the Netherlands, loss of reputation is a risk that is gaining weight. However, the Reuber and Fischer study (2010) shows that condemnable behaviour on the part of a company does not automatically lead to loss of reputation. If consciously or unconsciously facilitating human trafficking is seen as condemnable behaviour on the part of a hotel, it does not necessarily follow that this will lead to reputational damage. It seems that the conditions under which the behaviour occurred are determining, as well as the interests of the stakeholders in the hotel and the frequency and tone of voice in terms of media attention.

The legal perspective

Virtually all relevant Dutch literature refers to Article 273f of the Criminal Code as the basis for criminalisation of human trafficking. However, human trafficking is a broad term and the text of this Article seems rather general and can be interpreted in different ways. Beijer (2010, p. 8) describes this as “the complexity of the phenomenon of human trafficking is reflected in the long criminalisation of Article 273f Sr. This article criminalises different forms of human trafficking but is less than clear on some points”.

In order to find a clearer answer to the possible criminal liability of hotels in relation to human trafficking, I consulted with three experts from a public/private collaboration to prevent and combat human trafficking in the hotel industry. The first, at the PPS, was a senior public prosecutor formerly responsible for human trafficking at the National Public Prosecutor’s Office. The second, at the CID, was a criminal investigation expert in the field of human trafficking within the department. The third was a lawyer who frequently works on human trafficking-related cases. They answered the following questions to obtain a clear picture of the criminal liability of hotels in relation to human trafficking.

Criminal liability?

PPS: Criminal liability resides in providing accommodation for a woman you know to be exploited. It also resides in intentionally benefiting from the exploitation of another human being (receiving rent for the hotel room while one could have suspected that exploitation was involved). The difficulty lies in proving the intentionality of benefiting from the situation.

CID: Criminal liability resides in intentionally benefiting from the exploitation of another human being. However, the condition for criminal liability is that the person who benefits knows, or should reasonably suspect, that sexual exploitation is involved.

Criminal lawyer: Before talking about intentionality, it should first be rendered plausible that the observed prostitution was coerced. Clear signals of coercion cannot always be demonstrated in actual practice.

The PPS relies on the broadest definition of the offence in Article 273f. The CID considers a more limited cause for criminal liability. Both see difficulties in proving intentionality. The criminal lawyer’s precondition is that it must first be proven that the prostitution was coerced before intentionality can come into play. In summary, the experts are not unanimous in their interpretation of this part of Article 273f.

Criminal intent?

PPS: From a legal perspective, there is no dividing line between conscious or unconscious facilitation. The question is whether intentionality is involved in benefiting from exploitation of another human being.¹ There are different levels of intentionality. If intentionality cannot be demonstrated, the accused is acquitted. The gravity of the situation does not have any consequences for criminal liability, but it does have an impact on the judgement.²

CID: The line between conscious and unconscious facilitation relates to the legal interpretation of the concept of intentionality. Conditional intent must be proven, and the court will impose a higher sentence to the extent that more serious forms of intent can be demonstrated.

Criminal lawyer: There must be a part of consciousness in relation to the non-voluntary nature of the prostitution.³ The PPS and CID are univocal in their conclusion that at the very least, conditional intentionality must be proven. The sentence will increase to the extent that more serious forms of intentionality can be proven. The criminal lawyer refers to a precondition that it must first be established that the prostitution was involuntary. Only then can it be demonstrated that hotel personnel were aware of the fact.

Sexual exploitation?

PPS: No, although human trafficking is often associated with other offences. Prostitution is an industry that requires permits. Operating prostitution is allowed in a hotel only if the hotel has the relevant permit. Hotels do not have a permit. However, this is covered by administrative law, not criminal law.⁴

CID: Based on the APV (Code of Ordinances), illegal hotel prostitution can be an offence. It is not covered by the Criminal Code, however.

Criminal lawyer: Only if the prostitute is a minor, in which case criminal liability is automatic.⁵

The experts are partially unanimous on this question. Except Article 273f, the Criminal Code does not contain other

grounds on which a hotel can be held liable for facilitating human trafficking unless the prostitute is a minor. Operating prostitution in a hotel is an offence because there is no prostitution permit, however, this is covered by administrative law and not the Criminal Code.

Exploiting human trafficking?

PPS: A fine, and in the most serious of cases suspension of the company's operations. A prison or suspended prison sentence for a hotel manager, only in exceptional cases when the hotel collaborates actively with human traffickers. Under Article 51, legal entities can commit criminal offences as much as natural persons. As senior executives, board members can also be indicted.

CID: A fine or cessation or suspended cessation of operations.

Criminal lawyer: A fine or prison sentence in combination with deprivation if the manager is indicted on account of their own actions. If the manager is indicted as a senior executive, any combination of measures can be demanded.

The experts all agree that a hotel will, at the very least, be fined if found guilty of facilitating human trafficking. It also seems possible that a cessation or suspended cessation of operations may be ordered if the facts are considered serious enough. Whether the manager is indicted depends entirely on their role in the process. A prison or suspended prison sentence may even be demanded if their role was condemnable.

In conclusion, we can state that a hotel is criminally liable in relation to human trafficking if conditional intent to benefit from exploitation of another human being can be proven. The experts agree that demonstrating such minimal intentionality is difficult. The criminal lawyer also states that it must first be demonstrated that the prostitution was coerced. However, there are some aspects in relation to Article 273f with regard to which the experts use different interpretations. This confirms Beijer's (2010) statement that Article 273f is rather unclear on some points.

The ethical perspective

"Human trafficking is considered a grave violation of a person's physical integrity and a gross offence against his or her human rights" (Rijken et al., 2013, p. 5). Human trafficking is generally associated with a range of related criminal offences, such as illegal transportation of people, rape, sex with minors, child pornography, abuse, illegal labour, forgery, fraud, forced abortion, threats, obstruction of the freedom of expression, stalking, illegal deprivation of freedom, participation in a criminal organisation, money laundering and tax evasion (Ten Kate, 2013).

When taking Donaldson's (1989) ten basic moral rights as a starting point, it is easy to conclude that most victims of human trafficking are deprived of at least half of these basic moral rights. The clearest examples are the right to physical safety, the right to freedom of movement, the right not to be tortured, and the right to property. This creates an ethical duty for the hotel industry to participate actively in combating human trafficking and preventing facilitation of human trafficking.

When placing the hierarchical scale of ethical duty (Jeurissen, 2009) next to the hotel industry's ethical duty to prevent human trafficking, there are interfaces at each of the four levels. The first level is to "cause no harm". It does not seem likely that a

hotel would autonomously cause harm in relation to human trafficking unless it intentionally facilitates and participates in human trafficking. The second level is to "prevent or at least refrain from encouraging others to cause harm". Hotels should not rent rooms to victims of human trafficking and their exploiters if they suspect human trafficking is involved. The third level is to "combat existing harm". If a hotel suspects that a guest in one of its rooms is a victim of human trafficking, it has the duty to report this to the police so that they can intervene at that moment. The fourth level of the scale of ethical duty is to "encourage goodness". Hotels must provide frequent and adequate staff training in recognising signals of human trafficking.

However, things are often more grim in actual practice than simply following the aforementioned steps in the hierarchy of moral duties. In the first place, the basic attitude of hotel employees is hospitable and serviceable by nature. This may cause hotel employees to be insufficiently alert to professional human traffickers that misuse the hospitality and exploit their victims, using the hotel as a base. In the second place, victims of human trafficking are not always recognisable as such. "In many cases, particularly where sexual exploitation is involved, a complex relationship exists that may emerge from a romantic relationship or a romantic relationship feigned by the offender, dependency, having children together, and fear" (Rijken et al., 2013, p. 26). In the third place, the collaboration between police, justice and the hotel industry in combating human trafficking is recent. And finally, not all hotels provide adequate training for their employees and not all police control rooms respond equally adequately to hotel reports concerning suspected human trafficking.

Apart from these obstacles, the hotel industry has a clear moral duty to prevent human trafficking. In order to provide some kind of framework for a hotel's responsibility in relation to human trafficking, it can answer the following four questions. If a hotel does facilitate human trafficking, is it conscious or unconscious? Does a hotel provide adequate training for its personnel to identify signals of human trafficking? Is the situation so obvious that a hotel employee should reasonably suspect human trafficking? In case of a suspicion of human trafficking, does the hotel report it to the police immediately?

In conclusion, where the responsibility of hotels in relation to human trafficking begins is clear. This is the first level in the hierarchy of moral duty to refrain from causing harm. It is less obvious where that responsibility ends. The four questions discussed above could be answered to determine this. If a hotel does not consciously facilitate human trafficking, if it provides adequate training for its employees, if a situation of suspected human trafficking is clearly recognisable and the hotel immediately reports it to the police, one could say that this is where the hotel's responsibility reasonably ends. It has fulfilled its moral duty to prevent human trafficking.

How to prevent human trafficking?

In recent years, the hotel industry has developed a greater awareness of the damage caused by human trafficking and the industry's responsibility in this respect. The NRM (2013, p. 13) puts it as follows: "I am thinking of the collaboration between the police and hotel industry, and training provided

to hotel employees in identifying signals of illegal prostitution and possible signals of human trafficking”.

In the public/private collaboration between the CID, PPS and hotel industry as represented by the industry organisation KHN, many steps and actions have been taken in recent years. On 23 November 2009, the KHN presented a *Handreiking aanpak mensenhandel en illegale prostitutie in hotels* (“Guide to tackling human trafficking and illegal prostitution in hotels”) to the Dutch House of Representatives in response to the mainly legal uncertainties regarding human trafficking in hotels. Because this guide proved impractical in actual practice, the first collaboration between the CID and KHN emerged. They developed a practical signal chart for hotel employees to recognise signals of human trafficking more easily. In 2011, the CID offered workshops to some 300 hotel employees in Amsterdam aimed at facilitating use of the signal chart.

However, the PPS still believed that hotels were not sufficiently committed to tackling human trafficking. This resulted in the campaign with actresses posing as prostitutes as described earlier. The campaign led to an active discussion between the CID and PPS on the one hand, and the KHN and relevant hotels on the other. It became clear that there was mutual incomprehension with regard to the interpretation of the signals of human trafficking. This led to key figures in the CID and PPR doing a “traineeship” in hotels so that they could experience, from the hotel employee’s perspective, how complex it can be to recognise signals of human trafficking. For all parties these new experiences led to an update of the human trafficking signal chart based on the traineeship experiences. Another conclusion was that in addition to the signal chart, a more tangible tool was needed to inform hotel employees about their role in combating human trafficking in hotels. This evolved into an information movie created on the joint initiative and with joint funding from the aforementioned parties. In May 2013, the movie called *Please disturb* was presented to all chain partners in combating human trafficking, including political figures, the NRM, PPR, CID and KHN, individual hotel companies, hotel cleaning agencies, and hotel schools, at a symposium organised for the occasion.

Some 1 500 copies of the movie have since been distributed to hotels, recreational parks, hotel cleaning agencies, and hotel schools in the Netherlands. The movie was translated into four foreign languages because many hotel employees who clean rooms do not speak Dutch. The movie was presented at a European human trafficking platform in 2014 and is now being used in information sessions on human trafficking at Dutch hotel schools.

The risk mitigation measures of the hotel industry in the Netherlands have therefore been taken primarily in the past few years, and there seems to be growing attention to this issue in the hotel industry. The structure of a public/private collaboration selected for the purpose seems successful in this respect. The initiatives described were taken at the industry level, and the KHN industry organisation stimulates them at the hotel level. To be effective, it is important to know the extent to which these initiatives are used in actual practice at the micro level. Are hotel groups, owners, managers and schools aware of the signal chart and information movie, and do hotel employees, employees of hotel cleaning agencies, and hotel school students receive regular training or education on the topic? Much of the success of these risk mitigation measures

seems dependent on the quality of management of individual hotels and the time and energy invested in the training and awareness of the employees.

Conclusion

Recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world. All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood. Everyone has the right to life, liberty and security of person.

This text comes from the preamble and Articles 1 and 3 of the Universal Declaration of Human Rights. It is obvious that human trafficking is a gross violation of human rights and causes a lot of harm in the world, permanently damaging the lives of the victims of human trafficking.

Human trafficking is a growing problem for the hotel industry in the Netherlands, partly because human trafficking as a form of organised crime is still growing on a large scale and in practice leads to sexual exploitation of the victims in the form of forced prostitution. Meanwhile, prostitution in the Netherlands is shifting from visible to less visible forms, such as prostitution based in hotels. Looking at the combined impact of these developments, it seems likely that the quantity of sexual exploitation cases of human trafficking victims in hotels will increase in years to come.

This development leads to serious risks for the hotel industry. The first risk is loss of revenue due to reputational damage when a hotel becomes embroiled in human trafficking. However, research has shown that condemnable behaviour of a company, such as ignoring signals of human trafficking, does not necessarily lead to reputational damage and therefore loss of revenue. It depends heavily on the circumstances. Hotel groups run an additional risk of reputational damage. The second risk is a fine, cessation or suspended cessation of operations of the company, and in extreme cases a prison sentence for the hotel manager if the hotel is found guilty of facilitating human trafficking. However, in this last case, conditional intent to benefit from exploitation of another human being must be proven, and this is not easy in actual practice. Being found guilty of facilitating human trafficking, however, may lead to further reputational damage.

In addition to the aforementioned risks for individual hotels and the industry’s reputation in general, it is obvious that the hotel industry has a moral duty to prevent human trafficking. To this end, a number of good risk mitigation measures have been implemented in recent years, such as the introduction of the signal chart, the *Please Disturb* information movie, and the information sessions for hotel employees and hotel school students. Clearly the success of these tools developed at the macro level to prevent and combat human trafficking in the hotel industry will remain dependent on the introduction, implementation and anchoring of the tools at the micro level within hotels, hotel cleaning agencies, and hotel schools. After the information movie was introduced and the signal chart was updated in 2013, follow-up research in the near future into the actual implementation of these tools and their effectiveness would be an important next step in preventing and combating the harm caused by human trafficking in the hotel industry. In

this way, the industry will be able not only to honour its moral duty, but also to mitigate the potential risks of loss of revenue and of legal consequences.

Notes

1. This can be interpreted in such a way that “conscious” suggests “intentional” and “unconscious” suggests a lack of intentionality.
2. This can be interpreted as meaning that conscious facilitation is worse than unconscious facilitation and may therefore lead to a higher sentence.
3. This can be interpreted as meaning that it must be demonstrated that the presumed victim of human trafficking involuntarily worked as a prostitute.
4. The permit referred to is a prostitution permit.
5. In the Netherlands, anyone under the age of 18 is a minor.

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