In 2010, ICCR first asked Delta to consider signing the ECPAT tourism code of conduct, which seeks to protect children from sexual exploitation. Within a year, it had agreed to do so - can you tell us what factors led to this swift decision, and how signing has impacted Delta’s day-to-day operations?

LETTY: After being asked to support ECPAT, Delta Air Lines CEO Richard Anderson quickly concluded that as a global carrier, using Delta's people, infrastructure, and other resources to help combat human and child trafficking, was “the morally right thing to do”. As part of this commitment, Mr. Anderson signed the ECPAT Code of Conduct, Delta adopted a policy against human rights abuses that condemns all forms of human rights abuses, and the company began taking steps to raise awareness among employees and business partners about the harms of human and child trafficking.

As the first major airline to sign the code, Delta had to develop a human trafficking awareness training program which would teach its employees how to identify and report trafficking activities. Can you talk a bit about how you designed and manage it - where you looked for models, who conducts it, how often the program is updated, and the metrics you use to measure success?

LETTY: Shortly after Delta began working on creating its own corporate Human Trafficking Awareness Training, the Department of Homeland Security (DHS) and the Customs and Border Patrol (CBP) announced the creation of the Blue Lighting Initiative, through which CBP would make training available to commercial airlines, to help airline employees identify and report potential trafficking activity. Earlier
this year, Delta became a Blue Lightning member, and has worked with CBP to finalize computer based Blue Lightning Training that is customized for Delta’s customer-facing airport employees.

How difficult is it to manage trafficking and other human rights risks throughout your supply chain and what are your plans for addressing them?

**LETTY:** Delta Air Lines currently has in place a Supplier Code of Conduct. This Code of Conduct has been updated to include specific language condemning the sexual exploitation of children. Certain of Delta’s supplier contracts now also include provisions requiring the common repudiation of child and human trafficking abuses. Delta will continue to its efforts to include similar provisions in new contracts, or contracts that are being renewed, with appropriate suppliers.

What awareness raising programs does Delta have in place to educate its employees and its customers about the risks of human trafficking? Are there any obstacles?

**LETTY:** As part of Delta’s ongoing commitment to educate its employees about the need to combat child and human trafficking, Delta has widely communicated its role as the first major airline to sign the ECPAT tourism code of conduct and as one of the first airlines to join the Blue Lightning Initiative. As part of the company’s Speaker Series for employees, Delta hosted a writer and human rights activist who shared her experience as a victim and survivor of human trafficking. Delta has also included information about ECPAT on delta.com, to raise awareness among employees and customers. Delta also plans to create a dedicated portal on the company’s intranet, to update employees about these efforts.

How do you see the leadership role you’ve taken influencing how other companies in your industry manage human rights risks?

**LETTY:** Delta continues to participate in community and business outreach and networking events to develop and share best practices for raising awareness and combating child and human trafficking.

What advice might you offer other companies in the travel industry that are considering - or have been asked - to sign the ECPAT code?

**LETTY:** Companies who are considering signing on the ECPAT should consider the important impact their company and employees can have in helping to raise awareness about the harms of child and human trafficking.

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**ECPAT’S CODE OF CONDUCT FOR THE PROTECTION OF CHILDREN FROM SEXUAL EXPLOITATION IN TRAVEL AND TOURISM**

Child sex tourism is the practice of foreigners sexually exploiting children in another country. Each year more than two million children are exploited in the global commercial sex trade, some as young as five years old. The ECPAT Tourism Child-Protection Code of Conduct is a voluntary set of business principles that travel and tourism companies can implement to prevent the trafficking of children and child sex tourism.

This tool consists of the following six criteria, which members of the tourism industry must adhere to once they join The Code:

1. Establish a policy and procedures against sexual exploitation of children;
2. Train employees in children’s rights, the prevention of sexual exploitation and how to report suspected cases;
3. Include a clause in contracts through the value chain stating a common repudiation and zero tolerance policy of sexual exploitation of children;
4. Provide information to travelers on children’s rights, the prevention of sexual exploitation of children and how to report suspected cases;
5. Support, collaborate and engage stakeholders in the prevention of sexual exploitation of children; and
6. Report annually on their implementation of Code-related activities.