

# **Santa Clara Pueblo Gaming Commission**



## **Human Trafficking**

Revised 7/21/2022

## **CHAPTER IV – GENERAL PROVISIONS**

### SECTION 30: HUMAN TRAFFICKING

30.1	Purpose .....	30-1
30.2	Authority .....	30-1
30.3	Human Trafficking Awareness .....	30-1
30.4	Employee Training.....	30-2
30.5	Role of the Commissions .....	30-2

## **CHAPTER V – GENERAL PROVISIONS**

### **SECTION 30: HUMAN TRAFFICKING**

**30.1 Purpose.** The purpose of these regulations is to require for the Commission to adopt and enforce procedures, to ensure the safety and protection of patrons, visitors and employees from suspected human trafficking occurring on the gaming premises and for the conduct of Class III Gaming that are in compliance with the Tribal/State Compact approved on October 23, 2015.

**30.2 Authority.** The Commission has authority to regulate and to promulgate and enact regulations pursuant to delegated authority from the Santa Clara Pueblo Tribal Council and the Santa Clara Pueblo Gaming Code. The Commission has the responsibility under the Gaming Code to enforce all policies and procedures for suspected human trafficking applicable to the gaming operation occurring at the gaming facility. The Commission also has the authority to issue regulations, not inconsistent with the Gaming Code, the Compact, and IGRA, to govern the operation and management of each gaming operation and gaming facility. The Commission shall work with each gaming enterprise or management contractor to establish policies and procedures for human trafficking awareness applicable to the gaming operation and/or occurring on the gaming premises.

#### **30.3 Human Trafficking Awareness.**

- (1) All employees shall receive guidance from their managers and supervisors in the recognition of behavioral indications of possible human trafficking victims and the actions necessary to report these situations. Guidance shall be included in department policies, new hire orientation, and information distributed by the Public Safety Department.
- (2) The gaming operation shall submit a copy of its procedures established pursuant to the requirements of this Section to the Commission. Any amendments to said procedures shall be submitted to the Commission prior to their implementation.
- (3) When human trafficking is suspected on the gaming premises, employees will report it to the Public Safety Department immediately.
- (4) The gaming operation shall post in all restrooms of each gaming facility, signs in both English and Spanish, stating that help is available if a person is a victim of human trafficking, provide an appropriate telephone number and information on how to alert the Public Safety Department.
- (5) As approved by the Commission, the gaming operation shall establish a human trafficking awareness training program and identify a person to be responsible for training, or coordination of training to ensure that regulatory requirements of this section are implemented, administered, and monitored to maintain compliance.
- (6) The human trafficking awareness training program established by the gaming operation shall include training manuals and other materials necessary to educate employees about recognizing human

trafficking victims. The program shall include, but not be limited to, instruction in the psychology abuse of the human trafficking victims, methods of recognizing behavior of victims of human trafficking, intervention techniques and other relevant subjects.

- (a) The program should include specific, detailed procedures to determine appropriate intervention techniques and policy concerning carrying out the intervention techniques in a given circumstance where a human trafficking victim is identified or suspected;
  - (i) Assistance and referral programs, including specific resources and training on how to recognize behavior of victims of human trafficking and intervention techniques; and
  - (ii) Printed materials to educate patrons about human trafficking shall be conspicuously displayed and available to the public. The materials may include signs and posters located inside the gaming operation premises, brochures discussing human trafficking recognition and sources for seeking help.
- (b) The following persons shall be required to complete human trafficking awareness training:
  - (i) All gaming employees whose primary responsibilities require that they be present on the gaming floor;
  - (ii) All gaming employees whose primary duties require that they perform their job functions on the gaming floor;
  - (iii) Gaming employees working in player services, surveillance; and
  - (iv) Any other person(s) that the gaming operation may designate shall attend training sessions.
- (c) A record of all persons having successfully completed the required human trafficking awareness training shall be maintained by the person designated by the gaming operation as the trainer or coordinator of training and a copy of that record shall be supplied to the Human Resources Department, and to the Commission, upon request.
- (d) Human trafficking awareness training shall be completed:
  - (i) Within ninety (90) days of date of hire or promotion; and
  - (ii) Not less than annually thereafter for refresher training.

**30.4 Employee Training.** Each gaming enterprise shall see that all of its applicable employees are fully trained in the requirements of these regulations pertaining to human trafficking applicable to the gaming operation and/or occurring on the gaming premises. Such training shall be updated regularly by the gaming enterprise.

**30.5 Role of the Commission.** The Commission shall ensure the gaming enterprise has procedures established to administer, monitor and ensure compliance with this regulation.