



	<p>Intelligence related overwhelmingly to the London area. The remaining reports were distributed throughout the country, though no reports related to Northern Ireland. Potential victims are often Romanian, equally male or female, and can be of any age.</p>	
		
<p>Recruitment Websites advertise volunteering opportunities; many workers cannot speak English and seek employment in the industry to improve their language skills. Volunteers are being used to meet staffing requirements rather than employing paid workers.</p>		
<p>Fees Some agencies requested hundreds of pounds to arrange employment. Businesses may request money in exchange for better working conditions.</p>	<p>Control There were reports of workers' movements being monitored and restricted, and of threatening behaviour.</p>	<p>Payment Approximately a quarter of reports highlighted non-payment of the National Minimum Wage; other reports detailed withheld wages.</p>
<p>Accommodation Issues were frequently raised about accommodation connected to employment. Acceptance of accommodation can be a requirement of employment and is often onsite. This led to employees being pressured into working longer hours and providing an on-call service for guests at any time. Whilst often provided for free, sometimes high rents were charged.</p>		
<p>Key Questions to Prevent and Identify Labour Exploitation</p>		
<ul style="list-style-type: none"> • Do members of your organisation receive training on spotting the signs of modern slavery and labour exploitation? How do you publicise methods of reporting suspicious activity? • Do you have an internal escalation process if you identify an issue of exploitation? Do you know who to contact? • Has your organisation undertaken a modern slavery / labour exploitation risk assessment? What anti-trafficking measures are in place? • Are there mechanisms in place to engage with workers and ask questions about their recruitment and working conditions? Including access to translation services? • Are there regular audits to identify and address any exploitative labour practices? • What opportunities are there for collaborative working and sharing/adopting best practice within the hospitality industry? Have you considered joining the hospitality protocol? 		



Gangmasters & Labour Abuse Authority

What to consider when reporting intelligence

Example: A chain of hotels is involved in exploiting workers. Students from Pakistan are particularly targeted, they are not paid the National Minimum Wage. There are issues with wages being withheld.

What else? How many potential victims are affected? Are workers of other nationalities also exploited? What hours are worked? How does recruitment occur? Are there any more company details? Is the whole company involved in exploitation or a specific individual/group of individuals? What are the addresses of the hotels involved? Are there any other indicators of modern slavery?

Whilst not all factors may be known, any additional details will assist the GLAA in identifying people and locations involved for operational purposes and to improve our intelligence picture.



Resources

GLAA resources are available at <https://www.gla.gov.uk/publications/resources/> including a useful “Spotting the Signs” leaflet at <https://www.gla.gov.uk/media/4285/spot-the-signs-glaa.pdf>

Who to Contact

Please report to the GLAA:

- Unlicensed trading in the regulated sector (agriculture, horticulture, shellfish gathering and any associated processing and packaging) across the UK.
- Labour market offences (non-payment of the National Minimum Wage, breach of Employment Agency Standards) in the regulated sector in England and Wales
- Individuals, labour users or labour providers who are suspected of modern slavery and human trafficking in any labour industry (excluding sexual exploitation), or individuals who are potential victims of such activity in England and Wales.

Please report to partners:

- Issues of National Minimum Wage only, in sectors that are not GLAA regulated to the HMRC NMW team (<https://www.gov.uk/government/organisations/hm-revenue-customs/contact/national-minimum-wage-enquiries-and-complaints>)
- Health and safety issues only (all sectors) to the Health and Safety Executive (<http://www.hse.gov.uk/contact/concerns.htm>)
- Workplace relations and employment law issues (including contract issues, discrimination and grievances) to the Advisory, Conciliation and Arbitration Service (ACAS) (<https://www.acas.org.uk/index.aspx?articleid=1410>)
- When there is an immediate threat to life contact the police emergency number.
- To report labour exploitation, human trafficking or modern slavery outside of the regulated sectors in Northern Ireland or Scotland, contact the local police service