



Gangmasters &
Labour Abuse Authority

Slavery and Trafficking Risk Orders STROs

Working in partnership to protect vulnerable and exploited workers

Modern Slavery Act 2015

Part 2 – Prevention Orders S23 – STROs

- Satisfy court that the respondent has acted in a way which mean that
 - There is a **risk they will commit** a slavery or human trafficking offence, and
 - The order is **necessary to protect persons** from the physical or psychological harm which would be likely to occur if the respondent committed such an offence
- Application in Magistrates court – civil hearing so can use hearsay and CPIA doesn't apply
- Police, Immigration, NCA and GLAA
- Effective for at least two years



Modern Slavery Act 2015

- Conditions must “prohibit” respondent from doing a certain act except for the requirement to supply name and address changes
- Prohibitions placed on the respondent must be deemed necessary to protect persons from harm
- There are no borders on orders, so the prohibitions apply internationally
- Consideration as to the aims of the prohibitions and how they can be monitored and managed
- Details of the STRO, including prohibitions can be released into the public domain
- Up to five years for failing to comply



Catalin Gergely – Bridgwater STRO

“I thought he was a good man”

Romanian male survivor

- Advertised jobs in the UK on Romanian websites
- Arranged travel to UK if required
- Supplied accommodation
- Assisted with finding employment
- Provided transport to and from work
- Provided loans for food on arrival whilst waiting for first wages
- Told survivors the cost for his services was £150 each, rent was £70/week and transport to and from work was £30/week



Catalin Gergely – Bridgwater STRO

*“F**k it, just go to work. You have debts”*

Comment to Romanian female survivor

- Given a different address for application form
- £150 fee increased to £1500 once started work
- Escorted to the ATM and made to withdraw and hand over majority of wages each week (£300-£400)
- Loaned money for food
- Accommodation overcrowded, in poor condition, informally tied to work
- No tenancy agreement
- Vehicles in poor condition and with no insurance
- One couple paid an estimated £5000 due to interest over 4 months



Catalin Gergely – Bridgwater STRO

“I can’t refrain from crying when I remember. I work at that slaughterhouse and I ended up having nothing”

Romanian female survivor

- GERGELY had not worked for 4 years – evidenced by HMRC statement
- GERGELY paid his rent, drove a Range Rover, had gym membership, a Netflix subscription, frequented Costa daily, spent £100s on trainers, clothes and takeaways
- After paying four landlords rent he made on average over £4000 per month
- Hearsay – details from local authority housing officers
- Hearsay – details from four landlords
- ABE interview details - redacted
- Redacted intelligence indicating workers had been accompanied to hospital by GERGELY and had made disclosures about him being their employer
- Didn’t include telephone and ANPR evidence



Catalin Gergely – Bridgwater STRO

- Prevented from arranging or paying for anyone's travel into or out of the UK, other than for immediately family members.
- Prevented from arranging either travel or transport of anyone to work other than for his own immediate family.
- Must not arrange or assist anyone's work or assist them in finding employment.
- Prevented him procuring, coercing or instructing anyone to rent or sub-let any property or rooms controlled by them or any other accommodation which is owned, controlled or rented by them.
- 5 years

- On PNC
- Shared with BF, HOIE, UKVI (EUSS), local authority, A&S, Romanian authorities, GLAA LU/LP network, LGA
- Media – BBC radio Somerset interview
- Information shared with landlords
- Work with OnePay regarding direct debits for rent



STROs as a preventative tool

“The goal of prevention is to stop modern slavery from happening. If we are too late and exploitation happens, then we must intervene to stop further harm.”

Such L. Hayes K. Woodward J. Campos-Matos I. McCoig A. (2021) A public health approach to modern slavery: A guide for policy, strategy and local partnerships.

- Only need to show risk – not prove that slavery and trafficking has occurred
- Can be used to address conditions that enable exploitation
- Reduce likelihood of risk or harm
- Early intervention tool
- 1^o, 2^o or 3^o prevention
- Disruption
- Deterrence

