



Gangmasters  
Licensing Authority

# Labour Exploitation

## Spotting the signs



Working in partnership to protect vulnerable and exploited workers

This guidance has been produced for use within the industry sectors regulated by the GLA. It can also be used as a reference to assist anyone who comes into contact with individuals who may have been trafficked and/or are being exploited by people who wish to control their movements and actions to exploit them for their labour.

Labour exploitation can be an element of criminal offences of forced labour or human trafficking which themselves constitute modern slavery. This guide explains those terms and provides advice on how to spot the signs.

If anyone has any concerns as to the immediate safety of an individual the police should be contacted.

# Modern slavery

Modern slavery is a global problem and international crime, affecting millions of people worldwide, including many victims within the UK. Men, women and children of all ages and backgrounds are victims of human trafficking, forced labour, domestic servitude or debt bondage.

There are many ways that people can be exploited, forced to work for little or no pay. Types of exploitation include:

- Labour exploitation
- Sexual exploitation
- Domestic servitude
- Organ harvesting
- Criminal exploitation

Victims are controlled by force, threats, coercion, abduction, fraud and deception.

Any form of 'consent' given by a victim in these circumstances is irrelevant – no person can have control over another person by these means.

# What is human trafficking?

Human trafficking is the movement of a person from one place to another, within a country or across borders, into conditions of exploitation against their will.

## It consists of three basic parts:

**An action** - the recruitment, transportation, transfer, harbouring or receipt of a person

**A means** - the threat or use of force or other form of coercion, abduction, fraud, deception, abuse of power, a position of vulnerability, the giving or receiving of payments or benefits to control a person for the purpose of exploitation

**Exploitation** - which can include slavery, forced labour or services, servitude, forced criminality, sexual exploitation or the removal of organs

Once initial control is secured victims are usually moved to a place where there is a market for their services. This is often a location where they lack the language skills or other basic knowledge which would allow them to seek help. There may be one person trafficking the victims or a number of different individuals. Victims may also be passed or sold to different traffickers.

# What is forced labour?

“All work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.”

International Labour Organization

Forced labour is sometimes hidden but often people are exploited in plain sight. Victims come from a variety of backgrounds – they may be UK citizens, EU migrants or from outside of the EU.

The forced labour offences in the UK\* apply regardless of the victim’s immigration status or entitlement to work in the UK.

People who are subject to forced labour are typically made to work in sectors such as:

- agriculture\*\*
- food processing and packaging\*\*
- construction
- entertainment
- the service industry and
- manufacturing (in sweatshops)

\* The Coroners and Justice Act 2009, Criminal Justice and Licensing (Scotland) Act 2010

\*\* GLA regulated industry sectors

# What is debt bondage?

Victims of forced labour may also be victims of debt bondage, where they are tricked into working for little or no money to repay a debt.

An employer or a person controlling them (such as an agent) will use different tactics to trap the victim in an endless cycle of debt which can never be repaid and may even be passed on to their families. Poverty, threats, violence, surveillance and imprisonment are used to make sure they cannot leave or get help.

Debt bondage can also be a significant factor in human trafficking. Victims may be offered a job abroad, to include either “free” transportation or borrowing money from the employer/controller for the travel and a job finding fee. Once they have arrived they then find the job either does not exist or is not what was originally offered, and are trapped trying to pay off the debt.

# Spotting the signs

There are a number of indicators of trafficking and forced labour. Not all of the indicators will apply in every case, and some may not be immediately apparent.

Victims may be reluctant to tell their story through fear of reprisal or not being believed, through a feeling of shame about letting themselves be treated in this way, or because they do not know their rights and the treatment they are entitled to receive.

There are no set number of signs that will indicate that a person is a victim of trafficking or subject to forced labour. One or a combination of factors could suggest a person is a potential victim, so each case should be considered on an individual basis.

If during your engagement with a vulnerable and exploited person there is a belief that the indicators referred to within this guidance are being met you should seek assistance for that vulnerable person.

# The indicators

## Restricted freedom - Victims may:

- not be in possession of their passports or other travel or identity documents, as those documents are being held by someone else
- be unable to leave their work environment
- show signs that their movements are being controlled
- be unable to move freely
- be threatened with being handed over to the authorities
- be subject to security measures and controls to keep them on the work premises
- depend on their employer for work, transport and accommodation without any choice
- may only travel with other workers
- be controlled through religion, witchcraft, juju etc
- have limited contact with their families or with people outside of their immediate environment
- be unable to communicate freely with others
- be forced to shop at a place they would not choose
- have no access to medical care
- be in a situation of dependence
- be given only leftovers to eat
- come from a place known to be a source of human trafficking



- be subjected to violence or threats of violence against themselves or against their family members and loved ones
- be found in or connected to a type of location likely to be used for exploiting people
- have false identity documents

### **Behaviour** - Victims may:

- be unfamiliar with the local language
- act as if they were instructed by someone else
- allow others to speak for them when addressed directly
- be distrustful of the authorities
- be afraid of revealing their immigration status
- have limited or no social interaction either in the workplace or at their accommodation
- believe that they must work against their will
- never leave the workplace without their employer
- show fear or anxiety
- feel that they cannot leave
- have to resort to crime in order to get food or money for food
- may need to scavenge for food
- be forced to commit crime if there is no work available for them
- have acted on the basis of false promises

## **Working conditions - Victims may:**

- have no contract
- be unable to negotiate working conditions
- be unable to choose when or where they work
- be forced to work under certain conditions
- work excessively long hours over long periods
- not have any days off
- not be dressed adequately for the work they do: for example, they may lack protective equipment or warm clothing
- not interact with work colleagues
- lack basic training or professional licences
- believe they are obliged to work without pay in return for a favour or provision of accommodation

## **Accommodation - Victims may:**

- not know their home or work address
- not have been able to give their address to friends or relatives
- live in poor or substandard accommodation
- have no choice where they live or who they live with
- live in groups in the same place where they work and leave those places infrequently, if at all
- live in degrading, unsuitable places, such as agricultural or industrial buildings

## Finances - Victims may:

- receive little or no payment
- have no access to their earnings
- be disciplined through punishment or fines
- be under the perception that they are bonded by debt
- have had the fees for their transport to the country of destination paid for by facilitators, whom they must payback by working or providing services in the destination
- be told that they can pay debts for transport or accommodation when they are found work
- be charged for services they don't want or need
- be forced to open bank accounts
- be forced to sign documents to receive social security benefits, credit agreements or loans
- have bank cards/documents held by someone else
- have wages paid into an account used by other people

## Appearance - Victims may:

- suffer injuries that appear to be the result of an assault
- suffer injuries or impairments typical of certain jobs or control measures
- suffer injuries that appear to be the result of the application of control measures
- have injuries that appear old, untreated or that they cannot explain
- wear the same clothes each day

# Assisting victims

## Do:

- always maintain a victim centred approach when dealing with potential victims
- explain to the victim what is happening and what can be done to assist
- respect the needs and wishes of the victims
- take the victim to a place of safety where they feel comfortable to talk freely
- speak to victims individually and keep them separate from potential suspects
- keep multiple victims separate to allow them to give their account
- try to build a rapport and trust, dispelling any fear of law enforcement
- be aware that a victim may be suffering from stress or mental health problems brought on by their circumstances
- assess and arrange for any medical needs to be addressed
- look out for signs of any verbal or non-verbal communication between potential victims and suspects and make a note of them
- take account of cultural or religious views the victim may have
- give the victim as much information as you can and, if they consent to enter the National Referral Mechanism, explain what will happen next

- take steps to prevent further contact between the trafficker and their victim(s) by offering support/assistance through the service providers within the National Referral Mechanism
- be aware of the opportunities to gather information relating to, or evidence of, any offences to include obtaining identity documents, travel documents, financial information and communication devices where practical and possible to do so
- make contact with the police, or the GLA where appropriate, at an early stage, once you have identified the indicators

## Don't:

- expect victims to disclose immediately. Some may not know they have been trafficked or subjected to forced labour, some may have been told to lie and/or still be in fear of reprisals to them or their families
- make judgements if they have been complicit in part of their circumstances or work
- use unofficial interpreters or friends of victims to interpret, they may have their own agenda
- treat victims as suspects or immigration offenders
- expect victims to have access to travel or identity documents and, if any are presented, check they are legitimate
- seek to obtain any formal statement at the initial contact unless exceptional circumstances apply

# What we do

Modern slavery is a serious violation of human rights.

## What we do to fight it

Our role is to protect vulnerable and exploited workers. We work with partner organisations such as the police, the National Crime Agency and other government law enforcement agencies to target, dismantle and disrupt serious and organised crime.

The GLA licensing scheme regulates businesses who supply labour to the agriculture, shellfish gathering and food processing and packaging sectors.

Our licensing standards cover health and safety, pay, transport and accommodation. We check that tax, National Insurance and VAT regulations are met.

Through the intelligence we receive from our inspections, the public, industry and other government departments, we investigate reports of worker exploitation and illegal activity.

# What you can do

## Report it

If you have any suspicions of human trafficking, forced labour or worker exploitation you should report it immediately.

You can contact:

**The Police** - 101, or in the case of an emergency 999

**Crimestoppers** - 0800 555 111

**The GLA** - 0800 432 0804 or 0115 959 7032 (outside office hours)

**UK Slavery Helpline** - 0800 012 1700

**UK Human Trafficking Centre** - 0844 778 2406

# Information checklist

The following checklist details the information that law enforcement agencies may find useful to record during an investigation. It will also assist partner organisations to provide the victim with appropriate care and assistance.

- detailed descriptions of those involved
- where the victims are working and/or living
- other relevant locations
- methods used to control/manipulate the victim
- the length of time this has been happening for
- details of any transport used
- travel routes/methods
- financial information
- documents used
- method of recruitment
- national ties
- relations with the exploiter



# Further advice and guidance

## Gangmasters Licensing Authority

[www.gla.gov.uk](http://www.gla.gov.uk)

PO Box 10272, Nottingham, NG2 9PB

Telephone: 0115 959 7052 (Intelligence team)

Email: [intelligence@gla.gsi.gov.uk](mailto:intelligence@gla.gsi.gov.uk)

## UK Human Trafficking Centre

[www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre](http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre)

Telephone: 0844 778 2406 (24 hour advice and support)

**Salvation Army** - UK charity providing support and advice. Key contact for victims in England and Wales

[www.salvationarmy.org.uk](http://www.salvationarmy.org.uk)

Telephone: 0300 303 8151(24 hour referral line)

**Migrant Help** - UK charity providing support and guidance. Key contact for victims in Scotland and male victims in Northern Ireland

[www.migranthehelp.org](http://www.migranthehelp.org)

Telephone: 07766 668781 (24 hour hotline)

**Trafficking Awareness Raising Alliance (TARA)** -  
for female victims of sexual exploitation in Scotland

[www.saferglasgow.com/.../support-to-victims-of-human-trafficking.aspx](http://www.saferglasgow.com/.../support-to-victims-of-human-trafficking.aspx)

Telephone: 0141 276 7724

**Women's Aid Federation Northern Ireland** - for  
female victims

[www.womensaidni.org/](http://www.womensaidni.org/)

Telephone: 02890 249041

**BAWSO** - Support for victims in Wales

[www.bawso.org.uk](http://www.bawso.org.uk)

Telephone: 0800 731 8147 (24 hour helpline)

**NSPCC Child Trafficking Advice Centre** - specialist  
service providing information and advice

[www.nspcc.org.uk/Inform/research/ctail/ctail\\_wda84866.html#how](http://www.nspcc.org.uk/Inform/research/ctail/ctail_wda84866.html#how)

Telephone: 0808 800 5000

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)



**Gangmasters Licensing Authority**  
PO Box 10272 ■ Nottingham ■ NG2 9PB  
[www.gla.gov.uk](http://www.gla.gov.uk)

e: [enquiries@gla.gsi.gov.uk](mailto:enquiries@gla.gsi.gov.uk)  
t: 0345 602 5020