Intelligence received was predominantly linked to the Eastern region specifically Kent and Cambridgeshire, though there is also a significant concentration of intelligence in the Lincolnshire area.

### Recruitment
Regularly involves UK or overseas agencies, activity requiring a GLAA licence. Individuals have operated as intermediaries, inviting workers to the UK for employment and introducing them to UK agencies and labour providers through informal routes. Unlicensed gangmasters are actively operating in the industry, though licensed companies are not insusceptible to exploitative practices. Potential victims were commonly of Romanian, Bulgarian or Lithuanian nationality, male, and of all ages.

### Financial Exploitation
Many workers paid work-finding fees to secure employment; this is believed to counter low charge rates. Anecdotally, those who pay more receive more work, and optional charges are not always so if work is to be provided. Once received, employment is often below the National Minimum Wage and cash in hand. It is suspected that some workers brought to the UK for agricultural work end up being primarily exploited financially through the charging of rent.

### Transport
Transport to work is often provided at additional daily cost. There have been complaints concerning chicken catchers not being paid for travel time, resulting in significant financial losses due to the long journeys often completed.

### Accommodation
Commonly provided in a caravan, followed by residential properties. There are sometimes health and safety issues around suitability of accommodation.

### Working Conditions
There are concerns about available facilities for workers and rest times between shifts. Some workers reported receiving insufficient working hours leading to financial difficulties. Discriminatory practices, specifically against Bulgarian nationals, were highlighted, particularly around the number of hours offered and quality of accommodation. Limited reports indicated that workers were being controlled through the withholding of identity documents and wages, with some reports of threats to workers, their families or their properties.

### Labour Shortages
Agriculture has been identified as being particularly vulnerable to labour supply shortages. There is a high turnover of seasonal staff, with individuals only being employed for a few weeks or months. Many of those who are exploited travel solely to the UK for this employment and for many it is their first time travelling to the UK.
### Key Questions to Prevent and Identify Labour Exploitation

- Do recruitment processes include questions to identify whether a person may have been trafficked, paid work finding fees, or was otherwise exploited whilst seeking employment?
- Do you have any additional due diligence checks for workers at risk of being exploited? Including access to translation services?
- Are there regular audits to identify and address any exploitative labour practices?
- Do you actively use risk analysis to identify key areas at risk of modern slavery and exploitation in your business?
- Are business policies, including whistleblowing, ethical rights and health and safety, all fit for purpose in identifying, reporting and handling reports of labour exploitation and modern slavery?
- Do members of your organisation and your supply chain receive training on spotting the signs of modern slavery and labour exploitation?
- Do you have an internal escalation process if you identify an issue of exploitation? Do you know who to contact?

### What to consider when reporting intelligence

**Example:** Migrants are working on a farm for very little money.

**What else?** Provide the address of the farm and more details about the workers involved – what is their known or suspected nationality? Do any appear to be minors? Male or female? What hours do they work? Are shift start/end times known? How are workers arriving, are there vehicle details? How much are workers paid? How does recruitment occur? Who is the farm owned or run by?

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.

More information about agricultural work is available at [https://www.gla.gov.uk/i-am-a/i-supply-workers/do-i-need-a-glaa-licence/which-activities-need-a-licence/agriculture/](https://www.gla.gov.uk/i-am-a/i-supply-workers/do-i-need-a-glaa-licence/which-activities-need-a-licence/agriculture/)

Other GLAA resources are available at [https://www.gla.gov.uk/publications/resources/](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](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.

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