



<p>Powered by Bing © GeoNames, HERE, MSFT, Microsoft</p>	<p>Intelligence related predominantly to the London area, with intelligence also concentrated in Greater Manchester and the West Midlands. There was no intelligence linked to Northern Ireland. Potential victims are often South East Asian (mostly Vietnamese), female, and aged between 18 and 25 years old.</p>		
			<p>18 - 25</p>

<p>Most reports concern nail bars, though there is also information held on barber shops, hairdressers, massage shops and spas/saunas.</p>	<p><b>Recruitment</b> Young people are considered particularly vulnerable; 8% of reports mentioned minors. Some potential victims were instead exploited for sexual purposes. There is high staff turnover and many nail bars are believed connected.</p>
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<p><b>Transport to the UK</b> A quarter of reports in the sector concerned irregular migrants. Some potential exploiters are connected to organising people smuggling.</p>	<p><b>Trafficking</b> Many reports suggest that workers are potential victims of trafficking. Some were exploited in other countries prior to their arrival in the UK and there were reports of individuals in debt bondage at a price of up to tens of thousands of pounds. Some workers are being regularly moved between nail bars to avoid law enforcement detection.</p>	
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**Working Conditions**  
Potential victims are often described as being withdrawn, overworked or discontent. Despite potential exploiters appearing aggressive or threatening, reports of physical abuse were low.

	<p><b>Payment</b> Wages are regularly paid in cash. Apprentices or trainees received little to no payment, with trial days being used to obtain free labour.</p>
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**Accommodation**  
Most potential victims were linked to accommodation above or behind their place of employment, sometimes in overcrowded conditions.

	<p><b>Health and Safety</b> Concerns including inadequate ventilation, a lack of PPE and insufficient training were raised.</p>
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## 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?
- Do members of your organisation receive training on spotting the signs of modern slavery?
- Do you have an internal escalation process if you identify an issue of exploitation? Do you know who to contact?
- How do you ensure workers on site know how much they should be paid? How do you advertise how complaints can be reported?
- Are there mechanisms in place to engage with workers? Including access to translation services?
- How do you risk assess potential modern slavery and labour exploitation in your business?

## What to consider when reporting intelligence

**Example:** Nail bar is staffed by workers from South East Asia who speak limited English. The manager speaks to staff rudely and they fear him.

**What else?** Provide the address of the nail and more details about the workers involved - do any appear to be minors? Are they male or female? Is there any evidence of injury or workers being subjected to physical violence? What hours do they work? What hours is the shop open? How are workers arriving, are there vehicle details? Is there information to suggest that workers may be living in or above the nail bar? How much are workers paid? How does recruitment occur?

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

Other 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

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