



Intelligence received predominantly concerned London and the South East regions. No intelligence was received in Wales. Identified potential victims were commonly of Romanian or British nationality, under the age of 25, and equally male or female.



Recruitment

Work has been advertised as a volunteering opportunity in exchange for free accommodation and food. Irregular migrants are knowingly recruited into the workforce directly or through agencies, with limited reports of Tier 2 sponsor abuse, particularly in the hospitality industry.

Industry Trends

Turnover of staff is assessed to be high. One employer avoided paying workers by replacing them after a short duration of work. Another suggested that 50% of their staff would return to their home country at the end of their contract. Limited information also suggests that British and other European workers are being replaced with foreign nationals who have less understanding about their rights at work.

Working Conditions

Employees have been forced to work longer than agreed hours. Unsafe working practices including insufficient provision of PPE and training have led to injuries.



Payment

The most common complaint relates to wages being paid incorrectly, including non-payment of the National Minimum Wage. Those who are directly employed are likely to be paid more than those employed by an agency or self-employed. Some workers are paid at piece rate, equating to an hourly wage of as low as £0.56p per hour.

Key Questions to Prevent and Identify Labour Exploitation



- Do you know and understand each level of your supply chain, including contractors?
- How do you raise awareness of modern slavery and labour exploitation in the industry with customers, workers and organisations you supply/source workers to/from? Do you have a whistle-blowing policy?
- Do you have a publicised reporting process for complaints by workers?
- 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?
- Do your cleaners know how to spot the signs of modern slavery?
- Has your organisation undertaken a modern slavery / labour exploitation risk assessment?
- Do you have an internal escalation process if you identify an issue of exploitation? Do you know who to contact?



Gangmasters & Labour Abuse Authority

What to consider when reporting intelligence

Example: A cleaning company is paying workers below the National Minimum Wage; the workers are not provided with PPE.

What else? Provide more details about the workers involved – do you know what language they speak or what nationality they are? Do any appear to be minors? Male or female? What hours do they work? How are workers arriving, are there vehicle details? How does recruitment occur? Are there any more company details? What is the geographical impact?

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.glaa.gov.uk/publications/resources/> including a useful “Spotting the Signs” leaflet at <https://www.glaa.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