Intelligence is focused around the Eastern, Yorkshire and Humber, East Midlands and West Midlands regions. Large areas of the UK did not have any intelligence attributed, including Scotland and Northern Ireland. Workers are commonly aged between 23 and 32 years old, male, and from Romania or Poland.

**Recruitment**

It is common for a fee to be charged to arrange work, mostly by overseas agencies. Some individuals were trafficked to the UK.

**Payment**

Limited information suggested payment in drugs or cigarettes in lieu of wages.

**Health and Safety**

Poor conditions reported including machines and equipment not being tested, and issues with waste, lighting and fire safety. Reports highlighted charges for PPE, or insufficient PPE being provided. Workplace injuries resulted in hospitalisation in some cases. Work has been described as physically demanding.

**Horizon Scanning**

The manufacturing industry is facing a significant skill shortage, with key issues being availability of workers with technical skills, and an ageing workforce. Brexit is likely to exacerbate such issues by reducing the availability of EU nationals.

**Key Questions to Prevent and Identify Labour Exploitation**

- What measures are you taking to identify and prevent modern slavery and labour exploitation in your supply chain?
- Do recruitment processes include questions to identify whether a person may have been trafficked, paid work finding fees or was otherwise exploited whilst seeking work?
- Do you have a code of conduct for factories/suppliers? Are there regular audits to identify and address any exploitative labour practices?
- 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?
- What mechanisms are in place to understand high risk workers’ recruitment and working conditions? Are these effective?
- Do members of your organisation 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?
- Has your organisation undertaken a modern slavery and labour exploitation risk assessment?
- Do you have a publicised reporting process for complaints by workers?
What to consider when reporting intelligence

**Example:** A manufacturer in London pays workers little money and sometimes nothing at all. The workers get paid cash in hand and are controlled by the manager. Those who are vulnerable are specifically targeted for recruitment.

**What else?** Provide more details about the workers involved – do you know what languages they speak or what nationalities they are? Do any appear to be minors? Male or female? Are there specific vulnerabilities that are targeted? What hours do they work? How are workers arriving, are there vehicle details? How does recruitment occur? Are there any more company details? How much money are workers paid? Are there any reports of threats? Any indicators of physical violence? Who is responsible for coordinating and enforcing the exploitative practices?

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.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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