Intelligence was focused in the North East (particularly Tyne and Wear) and the West Midlands, with intelligence also concentrated in the London area. No intelligence was received for Wales or Northern Ireland. Potential victims are often Romanian, male, and in their thirties.

### Recruitment
Generally, occurs through word of mouth. Many workers are supplied by UK-based agencies; a small number of businesses paid agents to source cheap labour. Work may be advertised as requiring no experience or English language skills. Vulnerable people are targeted including those with disabilities and mental health issues.

### Payment
Individuals have been charging workers a fee to guarantee shifts. Workers are regularly underpaid or have their wages withheld. Some wages reported were less than £1 per hour, or with food and cigarettes being provided in lieu of wages. Temporary workers received lower wages than permanent employees.

### Health and Safety
Issues include insufficient training and excessive hours. Workers were described as exhausted and liable to accidents.

### Accommodation
Regularly substandard and makeshift, lacking basic amenities including water and heating. Workers reported travelling to fast food outlets and leisure centres to wash. Caravans and shipping containers were often provided onsite or at an employer’s home address. Threats and physical assaults were used to ensure compliance from potential victims. Food could consist of leftovers, sometimes collected from rubbish.

### 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 work?
- How do you ensure workers on site know how much they should be paid?
- Do you have any additional due diligence checks for workers at risk of being exploited? Including access to translation services?
- Do members of your organisation receive training on spotting the signs of modern slavery and labour exploitation? Are the auditors you use (if applicable) also trained?
- Do you have an internal escalation process if you identify an issue of exploitation? Do you know who to contact?
- Do you have a publicised reporting process for complaints by workers?
What to consider when reporting intelligence

**Example:** A Romanian supervisor is aggressive and threatens workers. Some workers are subjected to physical violence. Wages are sometimes withheld but workers are afraid to complain.

**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? Are there other indicators of control, for example provision of accommodation and transport to work? Do workers appear in good health?

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.