






	<p>Intelligence received was predominantly linked to the London area. No intelligence was linked to Northern Ireland.</p> <p><b>Recruitment</b> Businesses are suspected to be employing irregular migrants, and to a lesser extent, minors. There are vulnerable people in the workforce including people with mental health issues or alcohol dependency. Employment does not always require English language skills or experience and erroneous self-employment is a risk in the industry. Workers were most commonly male, Eastern European (Bulgarian and Romanian) or South Asian (Sri Lankan and Indian) and were often under the age of 20.</p> <div style="display: flex; align-items: center;">  <div style="margin-left: 10px;">     </div> </div>
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	<p><b>Transport to the UK</b> Some businesses were allegedly involved in human trafficking or smuggling of people and other commodities. There were particularly small independent convenience stores or minimarkets.</p>
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<p><b>Accommodation</b> Workers are often housed in residential properties or in caravans, sometimes with family members including children. Housing is frequently of poor quality.</p>	
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	<p><b>Financial Exploitation</b> Non-payment of the National Minimum Wage was highlighted in a quarter of reports. This included food/alcohol being received in lieu of wages. Some potential victims were reported to have taken money from their place of employment because they were not paid. When provided, payment is usually cash in hand, enabling some individuals to exploit the benefit system.</p>
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<p><b>Key Questions to Prevent and Identify Labour Exploitation</b></p>	
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- 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 make workers aware of their employment entitlements? Do you have a publicised reporting process for complaints by workers?
- Are there regular audits to identify and address any exploitative labour practices?
- 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?
- Are policies, including whistleblowing, ethical rights and health & safety, fit for purpose in identifying, reporting and handling reports of exploitation and modern slavery?



# Gangmasters & Labour Abuse Authority

## What to consider when reporting intelligence

**Example:** A foreign worker is employed in car sales for less than the National Minimum Wage. They are forced to live in a caravan with their family. There is no contract of employment and their movements are controlled.

**What else?** Are there other potential victims? Are other workers employed legitimately? Are there minors onsite? What hours do they work? In what condition is the caravan? Is there any evidence of physical violence? Is the potential exploiter regularly onsite? Does the potential victim get any days off? Are there any vehicles regularly in attendance?

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