Intelligence is focused around the East Midlands region, specifically Leicestershire and Nottinghamshire. Intelligence is also concentrated, though at a lower level, around the West Midlands and Wiltshire. Large areas of the UK did not have any intelligence attributed, including Scotland and Northern Ireland.

### Recruitment

Some workers were encouraged to recruit friends and family, whilst others paid a fee to obtain employment. Many reports highlight the presence of irregular migrants; some potential exploiters are believed to be involved in facilitating illegal entry. Workers are commonly aged between 20 and 40 years old, equally male or female, and from Romania or Bulgaria.

### Working Conditions

Long hours are regularly reported, with reports of compulsory unpaid overtime. Issues including a lack of PPE have resulted in injuries.

### Accommodation

Most workers are housed in residential addresses, shared with other workers. Transport to and from work may be provided as an additional service.

### Payment

Most complaints in the sector relate to non-payment of the National Minimum Wage, with workers reporting payments of less than £4 per hour. Limited information relates to work trials being used as a means of obtaining free labour. Foreign workers are being paid less than UK nationals.

### Key Questions to Prevent and Identify Labour Exploitation

- Do you have a code of conduct for factories/suppliers? Are there regular audits to identify and address any exploitative labour practices?
- Do you have a publicised reporting process for complaints by workers?
- What mechanisms 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?
- 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?
- Have you considered joining the textiles protocol?
What to consider when reporting intelligence

Example: A textiles company in the West Midlands is employing Eastern European workers who are described as unhappy. They have no breaks and work long hours.

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, what time do shifts start and finish? How are workers arriving, are there vehicle details? Are there any more company details? Is there any information about a potential exploiter?

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.

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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