



<p>Powered by Bing © GeoNames, HERE, MSFT, Microsoft</p>	<p>Intelligence was received predominantly relating to the East Midlands region. Potential victims are often Romanian, male, and aged between 20 and 25 years old.</p>		
<p>Workers are known to have returned to their home country due to irregular work patterns and work not being available for months at a time.</p>			<p>20-25</p>
<p>Recruitment Agencies and individuals (including current and former employees) are known to have arranged accommodation, employment and transportation to the UK, sometimes in exchange for a work finding fee.</p>			
<p>Type of Employment There have been various levels of subcontracting identified, with UK agencies being approached with requests for cooperation. Employment can be casual, with workers on temporary and zero-hour contracts. Workers may be told to arrive for work even if none is available.</p>			
<p>Transport to the UK Where known, more workers entered the UK by airline than coach or minibus. This is particularly true for Bulgarian workers who entered the UK in groups of over 30 in some cases. There are individuals who sent money to an agency to organise their flights and sometimes transport was paid for by an employer.</p>			
	<p>Payment There are concerns about workers being underpaid or having their wages withheld. Some workers reported being owed hundreds of pounds. Deductions from wages have occurred for unjustified fees including mistakes and damages, paperwork, not meeting targets and not turning up for work.</p>		
<p>Accommodation Accommodation and transport to and from work is regularly provided by potential exploiters who also organised employment. Acceptance and payment for these services is sometimes mandatory to receive employment, with payments which are sometimes described as excessive, being deducted directly from wages. Some workers lived with their potential exploiter.</p>			
<p>Working Conditions Conditions can be poor, in some locations unsafe, and consisting of physically demanding work. This led to health concerns or injuries in a small amount of cases. Some workers feared being dismissed due to illness or injury. Information suggested that workers were forced to meet targets by being refused breaks and being forced to do overtime. Security checks can also add an extra fifteen minutes to a worker's shift. One in ten reports identified workers being controlled by another individual or group, with documents and finances being withheld.</p>			



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?
- Do you know and understand each level of your supply chain?
- Do you have a code of conduct for factories/suppliers? Are there regular audits to identify and address any exploitative labour practices and modern slavery?
- Do you have a whistleblowing policy and publicised mechanisms for workers to report concerns?
- Do you have any additional due diligence checks for workers at risk of being exploited? Including access to translation services?
- How do you ensure workers on site know how much they should be paid?
- Do members of your organisation receive training on spotting the signs of modern slavery and labour exploitation?

What to consider when reporting intelligence

Example: Subcontracted warehouse workers are being paid less than the National Minimum Wage. They work shifts of up to 13 hours per day without any breaks. No holiday pay or sick pay is paid. Workers may be fined if they do not show up for work.

What else? How many workers are likely to be affected? Are all worker demographics affected? Where are the warehouses located? Are there any more company details? Are directly employed warehouse workers subject to better working conditions? Are there other arrangements made for accommodation and transport to/from work? How long has this exploitation been occurring?

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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