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Modern Day Slavery and Human Trafficking

This special additional newsletter is designed to brief businesses on the importance of being aware of Modern -day slavery and human trafficking, not only in your own workplace, but being aware of the signs within businesses you work in partnership with.

Modern Slavery and Human Trafficking (MSHT)

Safeguarding vulnerable victims and potential victims who may be exploited for forced labour and bringing their perpetrators to justice is a top priority for the Serious Crime Directorate of Essex and Kent Police. Slavery and Forced Labour is a current concern and is unfortunately occurring all over the UK right now.

Forced labour is found across the UK in sectors characterised by low-skilled, low-paid labour and among flexible, temporary (commonly agency) workers. Forced labour is principally an issue of exploitation, supply chain management and business operations – intersecting with the vulnerability of individual workers.

OPERATION FORT

In June 2020, a Review into Operation Fort was published by the Independent Anti-Slavery Commissioner. Operation Fort was the UK's largest anti-slavery prosecution to date – up to 400 victims of modern slavery were identified in West Midlands.

Tactics used by the controllers:

Given the fluidity of labour supply to farms and factories, suppliers not involved with the police investigation have admitted that victims could have passed unnoticed through their operations via temporary labour, especially if they were being swapped in and out of the business for very short time periods.

Tactics used might include conspirators blending into daily operations, for example as a line manager. Members of the organised crime group (OCG) accompanying victims to banks to open one or more accounts, using the same personal contact details for numerous victims and then diverting money from victims into other bank accounts. OCG members accompanied victims to job centres, applying for National Insurance numbers on their behalf, victims not understanding the significance of the numbers, nor the need to keep them private and then using the number in the infiltration of genuine recruitment agencies

Lessons learnt:

Employers and businesses did not have enough safeguards in place for temporary workers and they could have better educated their workforce on spotting the signs of slavery and exploitation. They did not have clear protocols for reporting concerns around labour abuse and employers should have been more proactive in looking for cases of exploitation

There is a strong belief that there are many organised crime groups operating these low risk, high reward criminal schemes across the UK.

An investigation by the National Crime Agency has been launched into Leicester's textile factories last week after a report has emerged of people working in slave-like conditions. Leicester's deputy mayor says this has been 'an open secret' for a number of years and as many as 10,000 individuals are subjected to such conditions of modern day slavery in Leicester alone.

A Kent prosecution in 2019 saw a family of traffickers put behind bars after using a small, legitimate local business to exploit vulnerable people. They made at least £900,000 throughout the conspiracy. Meanwhile, some vulnerable people worked 24 hours straight at the Lydd factory, being paid no more than £50 per week. A fake recruitment firm was set up as a veneer to the complex operation.

The victims were seriously malnourished, suffered long-term injuries and still struggle to come to terms with the way they were treated in modern day society.

Small to Medium sized Enterprises

Even though Section 54 of the Transparency in Supply Chain Provision of the Modern Slavery Act 2015 does not affect Small to Medium sized Enterprises (SMEs) there has been a significant increase in SMEs and smaller organisations incorporating parts of the Act into contracts with partners in order to comply with the law. This way ensuring not only that they have knowledge of Modern day Slavery and Human Trafficking but that it shows the company to be a responsible employer. The Act is regularly under review, and the expectation on individual businesses and organisations increases year on year.

It is common practice and a general point of excellence from an employer to produce Modern Slavery Statements which are formal public statements that are then published maybe on a company website, containing information about the structure and supply chain of their company plus the following points:

- The due diligence processes their business carries out on its supply chains.
- Details of any part of their business or supply chain where there might be a risk of human trafficking or slavery.
- Companies in high-risk areas such as farming, and manufacturing might want to start paying closer attention to exactly how their suppliers manage to provide such competitive rates. Much like the Bribery Act 2010, the Modern Slavery Act 2015 requires us all to take responsibility not just for what we do, but for what is done in our name.

'Whilst your business may not be required by law [at this current time] to submit an annual anti-slavery and trafficking report, being in a position to do so will boost your credibility and improve relations with any large company that requests one of you. You can minimise the risk of regulatory non-compliance and reputational damage by ensuring you understand the ownership and structure of a business before you enter any agreements with another business' - Callum Sommerton, Devant.co.uk

Sectors at risk include:

CONSTRUCTION - HOSPITALITY - AGRICULTURE - FISHERIES - FACTORIES - FAST FOOD OUTLETS AND FOOD DELIVERY COMPANIES
LIVESTOCK - CLEANING SERVICES - NAIL BARS - HAND CAR WASHES

Good Employer Practice includes:

Having an excellent awareness of MSHT

Assess your supply chain for ethical and high standards of employment.

Checks that each employee has their own identity documents and check these documents thoroughly until you are satisfied

Training and updates in MSHT available to employees in their preferred languages

Not relying on one person to be responsible for having the knowledge and passing that on to every employee

Ensuring that each employee has their own bank account to which they receive their wages to

Each employee receives their payslip

Close working relationship with the GLAA (Gangmasters Labour Abuse Authority)

Partnership with 'Stronger Together' - a multi-stakeholder business-led initiative aiming to reduce modern slavery particularly forced labour, labour trafficking and other hidden third party exploitation of workers.

Signs and indicators of victims include:

- They may not be in possession of their passports or identity documents
- Signs that their movements are being controlled; being driven to and from work
- Subject to security measures and controls to keep them on the work premises
 - Not taking breaks or not leaving the premises of their own free will
- Depend on their 'friend' for work, transport and accommodation without any choice
- They may be dressed unsuitably for the time of day, weather conditions, type of work they are doing and may lack basic protective equipment
 - Have no access to medical care, i.e. untreated injuries, signs of physical neglect
 - Show signs of trauma, i.e. keeping their head down, withdrawn, not talking
- Be given only scraps of food, or not being seen as eating anything during break time
 - Be unable to choose when or where they work
- Work excessively long hours over long periods/no days off and in numerous industries/sectors
 - Not know their home or work address or much about the area in general
- Live in groups in the same place where they work and leave those places infrequently, if at all
 - Live in degrading, unsuitable places, such as agricultural or industrial buildings

There are potential weaknesses in every supply chain, regardless of the size of the business. It is important not to become complacent - in order to eradicate modern slavery and human trafficking within supply chains to help to prevent and protect workers from exploitation or abuse, we must take necessary steps to ensure that exploitation and abuse of workers is recognised and addressed with appropriate safeguards put in place to ensure that exploitative practice is not repeated. Only when we are honest about our strengths and weaknesses, we can then improve our processes. Working openly and proactively with your suppliers to resolve issues and change working practices, regular training of staff and asking our workers to understand their rights would go a long way.

If you have concerns that someone is a victim of labour exploitation, call the GLAA's intelligence team on **0800 4320804** or email - **intelligence@gla.gov.uk**. Alternatively, call the police on **101**, the Modern Slavery Helpline on **08000 121 700**, or Crimestoppers anonymously on **0800 555111**.

The Business Crime Unit will continue to work closely with our colleagues both internally and externally to ensure we can support the business communities of Essex.

If we can offer any advice or reassurance, please contact us at

business.crime.unit@essex.police.uk

