

Tackling Modern Slavery Together





Mike Gladwin

Detective Chief Superintendent
Lancashire Constabulary

Tackling Modern Slavery Together





Sion Hall

Chairman

Pan Lancashire Anti-Slavery
Partnership

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Independent Anti-Slavery Commissioner

“Modern slavery is a truly horrific crime that is sadly happening in communities across the country. In the latest annual statistics, we saw a record number of potential victims being referred into the National Referral Mechanism, our framework for identifying and supporting potential victims. These figures show that the exploitation of children and young people is at an all-time high, the number of referrals of women and girls is increasingly, and labour exploitation is continuing to dominate as the most reported form of modern slavery faced by adults.

Modern slavery and exploitation, in all its forms, not only has a devastating impact on its victims but affects the whole of society and its wellbeing. That is why it crucial that we have a whole system approach to tackling it both at national and local levels. This includes raising awareness and having those open and sometimes challenging discussions. As we approach 10 years since the Modern Slavery Act was passed it is right that we reflect on progress made and look to the future about what needs to change now to end harmful practices, better support victims and survivors and bring perpetrators to justice.

I commend the Lancashire Constabulary, Lancashire Partnership Against Crime, Lancashire’s Police and Crime Commissioner, the Pan-Lancashire Anti-Slavery Partnership and Lancashire’s business and community leaders for coming together at the ‘Tackling Modern Slavery’ conference to discuss this important and very urgent issue.

We all have a role to play and when we come together, we can be more powerful than we think and deliver the change we want to see.”

Eleanor Lyons
Independent Anti-Slavery Commissioner

Modern Slavery in the Workplace

Does it affect me?

We are just a local business

Reputational Damage

What can I do?

What can I do?

Training & Awareness Raising across the company – Specific training for key staff, employee induction, agency & subcontractors, suppliers

Review Policies to include modern slavery—procurement, recruitment, HR, Whistleblower

Due Diligence – pre-engagement checks, audits, suppliers MS credentials

What can I do?

Areas of Risk – what do you do/produce? Supplier industry type eg agriculture/food production/construction/agency. Make up of workforce eg size, migrant, seasonal/temp, agency.

Mitigation of Risk – Audits, Supplier visits (frequency, announced?), consequences of non conformance.

Consider Modern Slavery Statement

PLASP, Just Good Work, Slave Free Alliance?

Help to fight Modern Slavery



Tackling Modern Slavery Together





Gangmasters &
Labour Abuse Authority

Spotting the signs of Labour Exploitation

Andrew Brown
National Investigations Manager

Andrew.Brown@gla.gov.uk

Who are the GLAA?

- An arm's length body of the Home Office
- Our role is to protect vulnerable and exploited workers by investigating labour abuse and exploitation across all aspects of the UK labour market
- Enforcement and Licensing Regime
- Partnership work to target, dismantle and disrupt serious and organised crime
- NRM first responder



2017 – GLA to GLAA – new powers

- The creation of ‘**Labour Abuse Prevention Officer**’ (LAPO).
- Investigate Labour market offences.
- PACE powers from Section 114B Police And Criminal Evidence Act 1984. (Only in England & Wales)
- Power to arrest and search in relation to offences contrary to:
 - Employment Agencies Act 1973
 - National Minimum Wage Act 1998
 - Gangmasters (Licensing Act 2004)
 - Part 1, 2 and 4 of the Modern Slavery Act 2015



“Horse Trading”

<https://www.youtube.com/watch?v=k-l5EtcewdM>



Missed Opportunities



- Czech OCG members trafficked and exploited 16 victims, forcing them to work at a McDonalds in Cambridgeshire as well as other locations.
- All victims were vulnerable persons living in the Czech Republic and recruited specifically to exploit.
- On conviction in 2024 they received custodial sentences ranging from 4 years to 13 years.



Signs that were missed

- Workers constantly asking for overtime and on shift for up to 30 hours, routinely working 70 to 100 hours a week
- Spoke little or no English
- ID Documents held by exploiter and not readily available
- Wages being paid into bank accounts registered to other people
- Numerous employees being registered to the same address
- Trafficker was present during the interviews under the guise of offering interpretation
- Appearing to be withdrawn and fearful of discussing personal circumstances with colleagues



Missed Opportunities-Repercussions

- Workers house in unsanitary, overcrowded and unfit accommodation
- Threats made to family in home country of workers
- Working excessive hours with little or no wages
- Mental and physical abuse
- Forced to carry out domestic duties at the exploiter's addresses
- Forced to work at other locations in several various roles
- Benefit Fraud-exploiters created fictitious claims in the workers names
- Reputational damage to the employer and those involved in the supply chain.



Steps you can take...

- Screening during interviews to spot any inconsistencies. Questioning could include whether the applicant is aware of their rights and working conditions in the UK
- Checking whether a recruiter has been involved, which could indicate trafficking or debt bondage. Applicants who have been recruited by unlicensed or dubious employment agencies may be at higher risk of exploitation.
- Confirming the applicant has control of their passport and personal documents
- Employers should have clear and confidential reporting channels through which employees and contractors can report concerns about exploitation. Particular attention should be paid to vulnerable workers such as migrant workers and temporary staff who may be at a higher risk of exploitation



Trends-Adult Social Care

Charging of excessive fees
for Visa both abroad and
in UK

Not paid for hours
worked, paid under NMW,
cash payments

Tied into accommodation
and charged excessive
rent for 'overcrowded and
poor' housing

Contracted hours not
available as per Visa
requirement

Contracted hours not
available as per Visa
requirement



Threat of 'sacking' – and
'tactical' sackings to allow
further exploitation of
new victims

'forced' to work excessive hours,
'forced' to sign Op Out or 'signed
on their behalf

Not paid for travelling time
between clients, continuous days
working with no rest days

Tied to exploitative employer, 60
days to find alternative, payment
of excessive fees if they leave

If complain then hours are
reduced or changed with no
notice



Modern Slavery really is hidden in plain sight

If it doesn't look or feel right....

It probably isn't !

Report





Tackling Modern Slavery Together





Helen Gordos & Victoria Wilde
Co - Founder Directors
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Overview

Trends and Patterns

Victims – Signs and Indicators

Victim Engagement

Exploitation Types

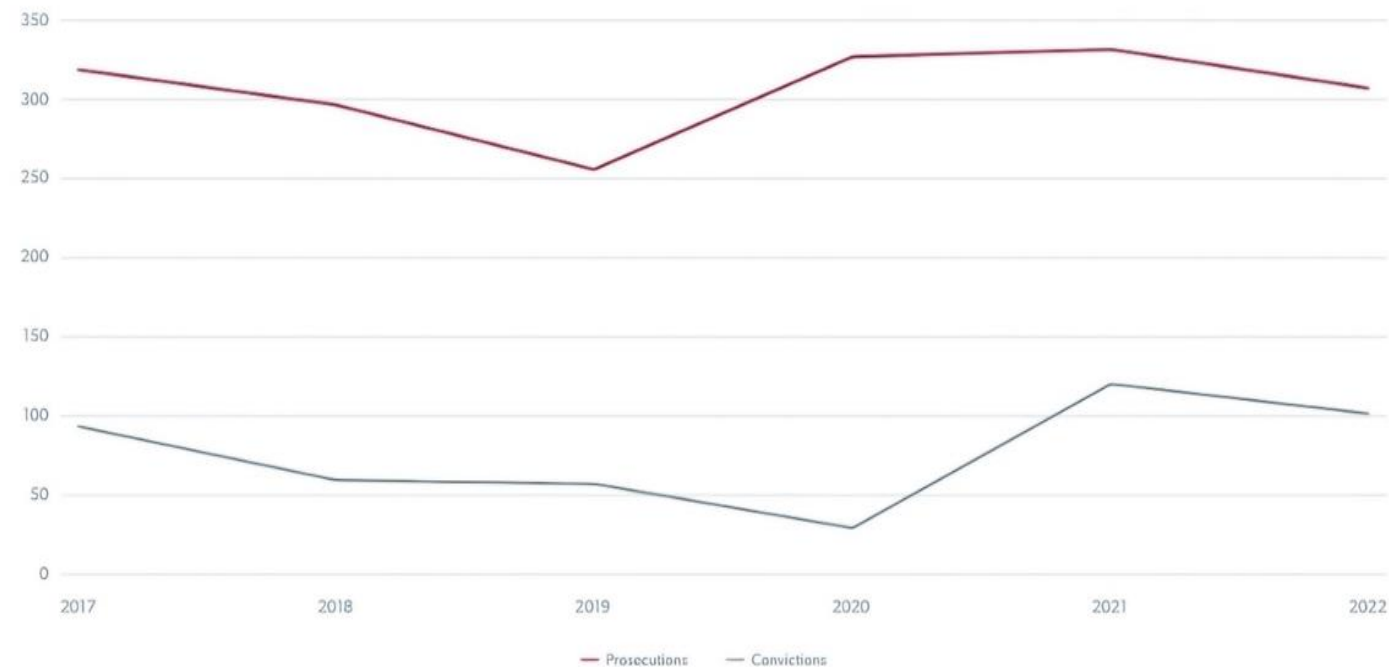
Case study – Operation Redroot



Prosecutions & Convictions

2022 - 307 prosecutions 101 convictions

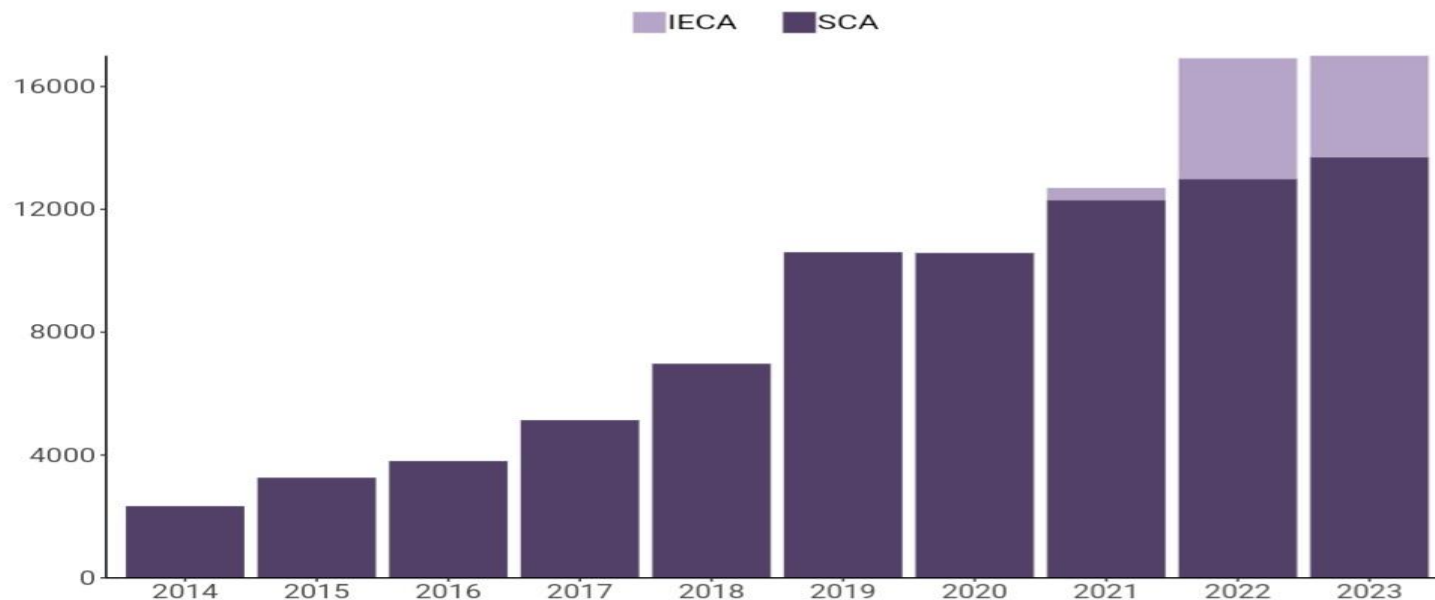
Figure 2. Number of prosecutions and convictions for modern slavery on all-offence basis 2017-2022





Victim Numbers

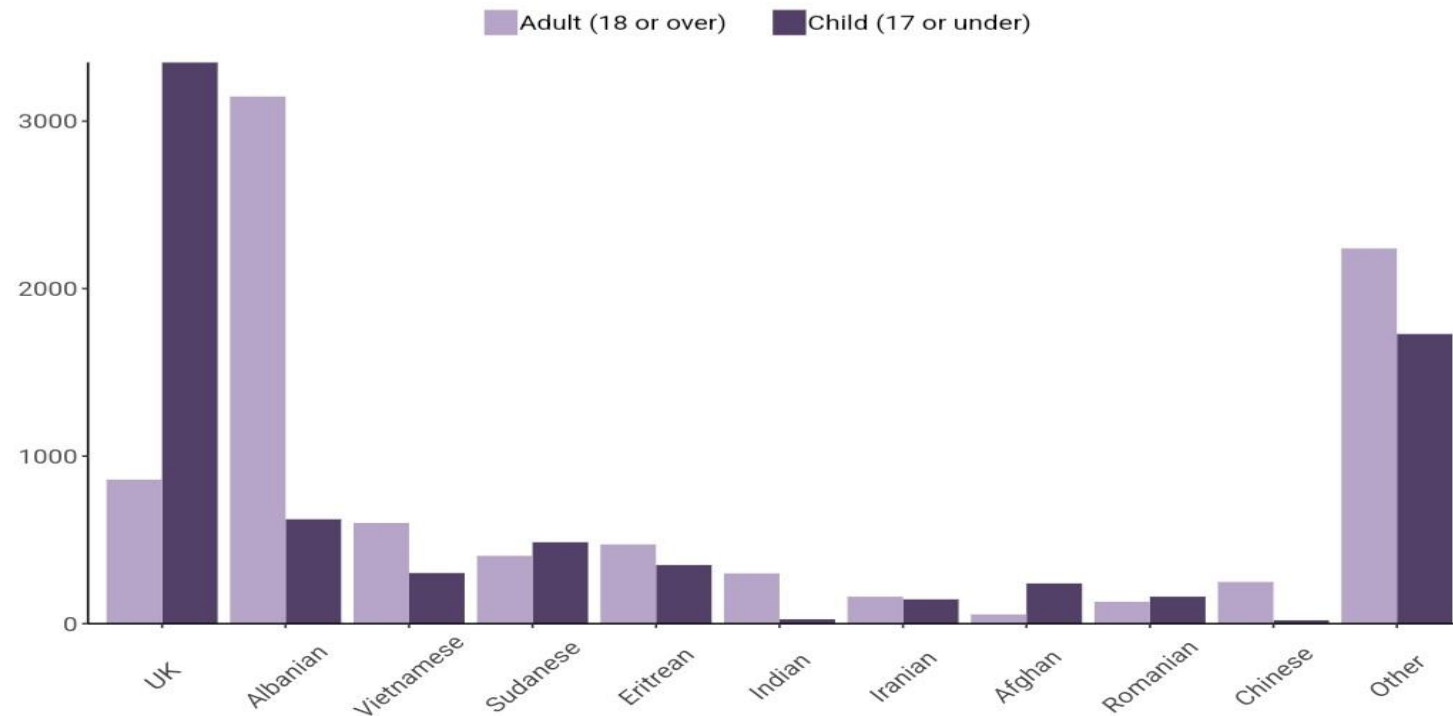
Figure 1: Number of annual NRM referrals by competent authority





Victim Nationalities

Figure 7: Number of NRM referrals for the most common nationalities of potential victims, by age group at exploitation





Victims Signs, Indicators, Engagement & Support





Forms of Slavery & Exploitation

Exploitation CAN BE ANYTHING, but common types include:

- Labour Exploitation.
- Sexual Exploitation.
- Criminal Exploitation.
- Domestic servitude.
- Child sexual exploitation.
- Financial exploitation.
- Organ harvesting.
- Sham/forced marriages.

Victims are often exploited in many different ways

Signs and Indicators – General

General Indicators			
Restricted movement	Lack of access to medical care	Limited social or family contact	Doesn't know addresses
Bonded by debt	Deductions from wage for food or accommodation	Dependant on others	Limited or no access to hygiene facilities
In location likely to be used for exploitation	Distrustful of authorities	Acts as if instructed by another	No access to Passport or IDs
Control over movement, as individual or group		Injuries from assault or controlling measures	

If it doesn't feel right, it probably isn't – take positive action.

Signs and Indicators – Forced Labour

Indicators of Forced Labour		
Poor or non-existent health and safety	Labour laws being breached	No labour contract
Employer or manager unable to produce documents for employing migrant labour	Employer or manager unable to provide record of wages paid to workers	
Employer or manager provides number of services e.g. transport, food and accommodation		
Workers required to pay for tools, food or accommodation via deductions from their pay	No or limited access to earnings or excessive wage reductions	

If it doesn't feel right, it probably isn't – take positive action.

Barriers to Engagement

Barriers to victim disclosing to authorities

Fear of, or lack of trust in authorities	Threats against the individual or family	Fear, anxiety, psychological trauma	Unaware they are a victim
Unaware help is available	Language barriers	Controlled movement	Always accompanied by exploiter
Isolation	Feel they have better life than previously	Immigration status	Involvement in criminal activity
Juju (witchcraft)	Worthlessness	Stockholm syndrome, trauma bonding, & learned helplessness	



Safeguarding Visits

The Issues

- Visits often by inexperienced officers/staff
- No preplanning
- Little or no Evidence or Intelligence Capture when obvious signs
- Lack of positive action
- Speak to victim in place of exploitation
- Not identifying as a victim
- Lack of proper screening/questioning

Non-disclosure Reasons

- Too Broken, too damaged, too much of their life stolen
- Fear
- No alternative
- Addiction
- Promoted to part of the criminality
- Financial
- Perceive their treatment as the norm



- Caroline Haughey OBE QC – One of the leading Barristers and experts in Human Trafficking and Modern Slavery in the UK.
- Quoted, “Growing Risk. People moved around easier than drugs and guns. More utilisable – Victims are like the Swiss Army knife of Criminality - Multi Purpose”.
- Stated that all we are doing by not being pro active during safeguarding visits is enforcing the message that the exploiters have paid off the police, “ *See nothing happened to us, we paid the police off and no one can help you*”.





The National Referral Mechanism

- The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery for support.
- Also provides data to count the number of victims in the UK
- Single Competent Authority - Decision Making Process
- They apply the international definition of Human Trafficking.
- Reasonable grounds – within 5 days – I suspect but cannot prove
- Conclusive grounds – after at least 45 days – balance of probabilities
- NRM = crime Report & Investigation

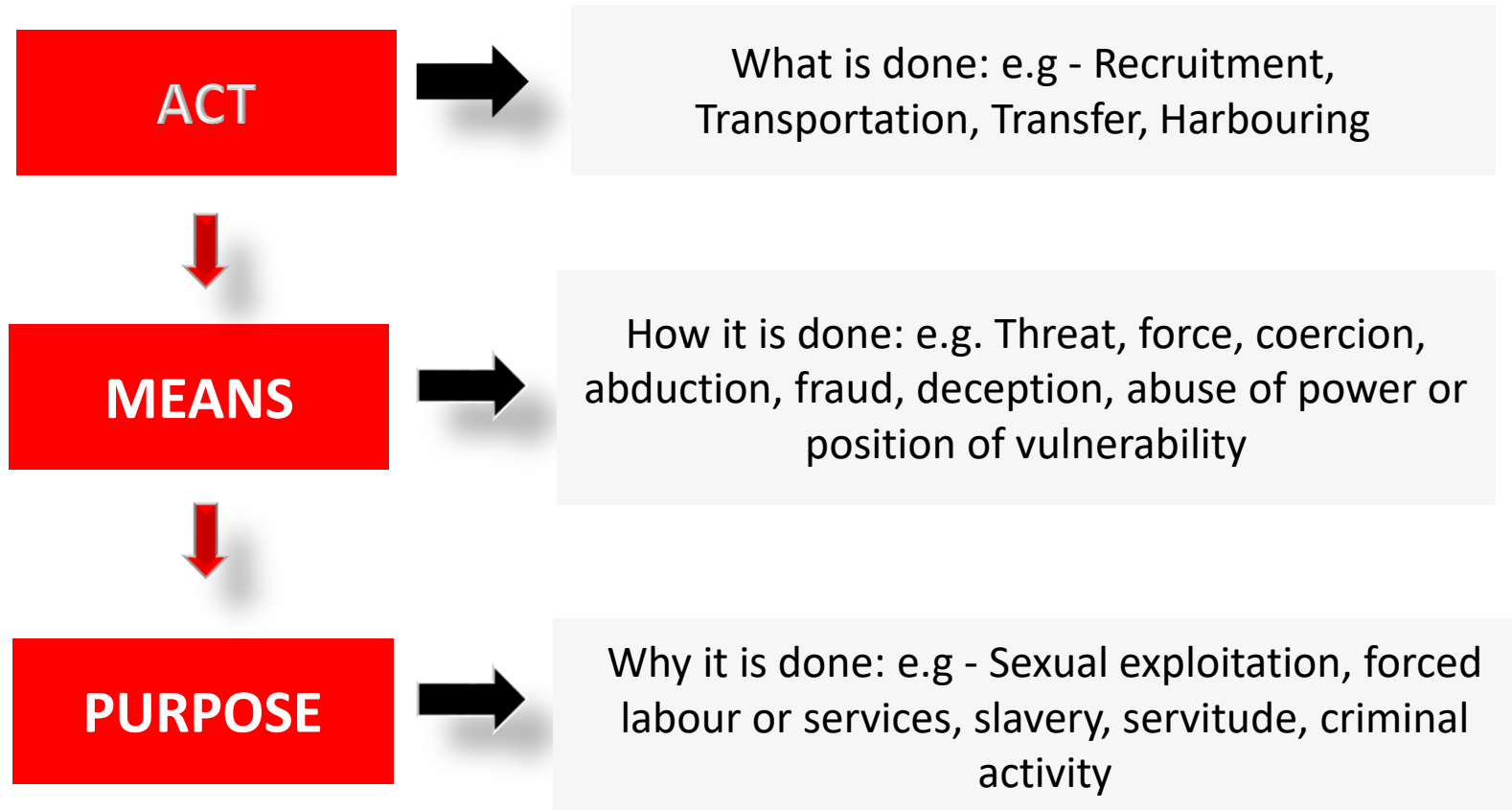


The Palermo Trafficking Protocol

- United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons
- Signed 12th December 2000
- Came into effect on 25 December 2003
- UK signed up 2009
- As of September 2016, ratified by 170 different countries
- Defines trafficking; focus on children; not criminalising victims when not in control of their actions.



Definition – Used by NRM



SCA Timescales;

RG decision – 5 working days.

CG decision – after 45 days...up to 12 months



First Responder Organisations

First Responders	
The Home Office	Kalayaan
Local authorities	Medaille Trust
Health & Social Care Trusts (N Ireland only)	Salvation Army
Police & National Crime Agency (NCA)	Barnardo's
Trafficking Awareness Raising Alliance (TARA)	Refugee Council
Migrant Helpline	Unseen UK
Gangmasters Labour Abuse Authority (GLAA)	BAWSO
NSPCC	New Pathways



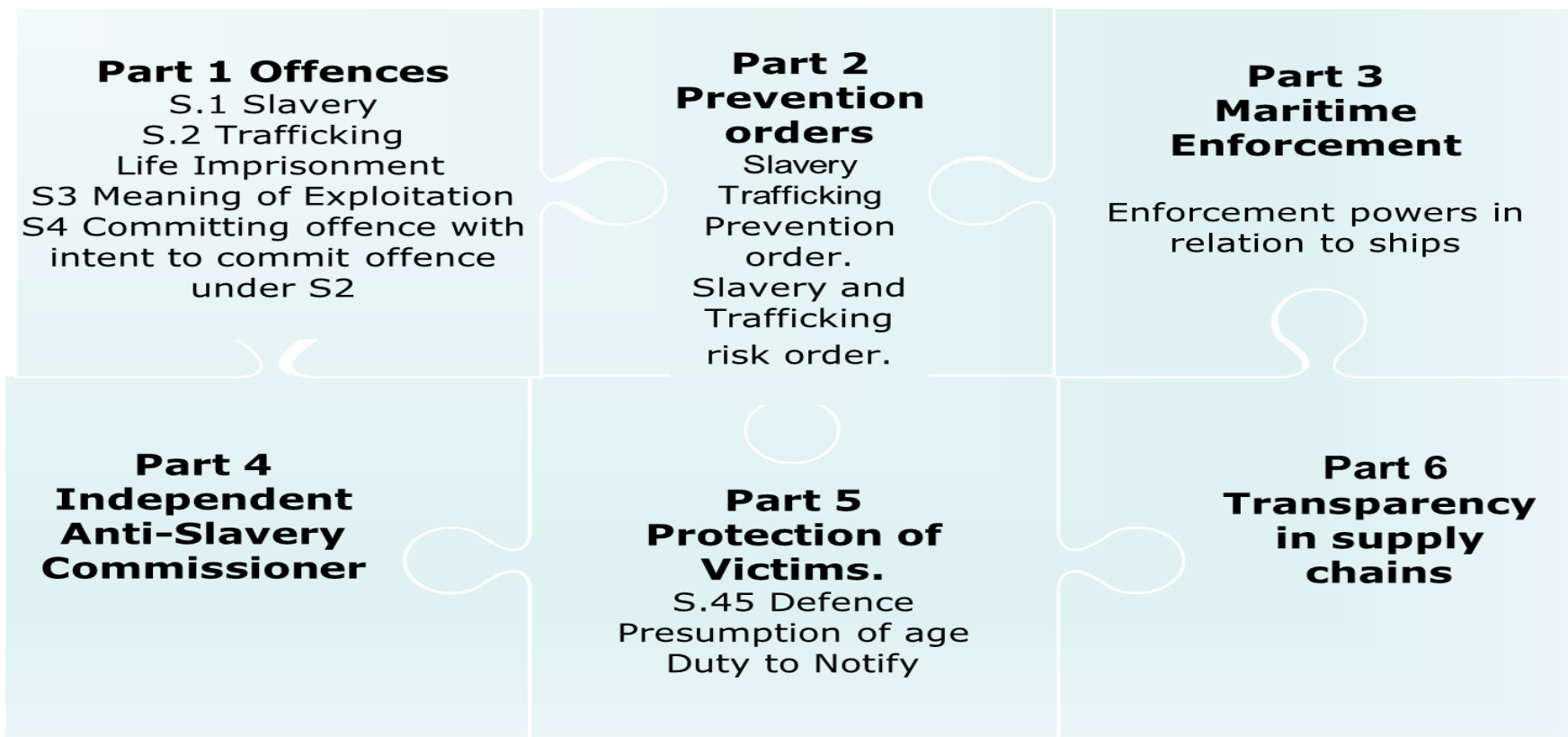
Duty to Notify

From 1st November 2015 certain Public Authorities have a Duty to Notify the Home Office about any potential victims of Modern Slavery they encounter in England and Wales.

Online system allows referrals to be made. If adults do not consent the NRM a Duty to Notify should be submitted via the gov website.



Overview Modern Slavery Act 2015





Modern Slavery Act 2015

Section 2 (6) EXTRA TERRITORIAL JURISDICTION

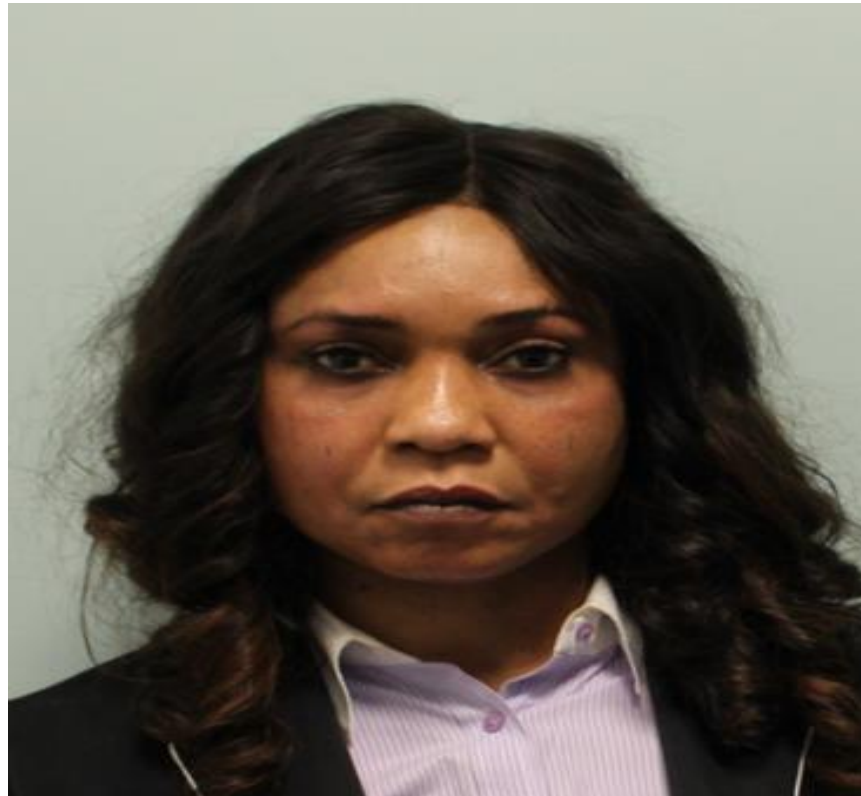
A person who is a UK national commits an offence under this section regardless of;

- (a) where the arranging or facilitating takes place, or
- (b) where the travel takes place.



Operation Redroot

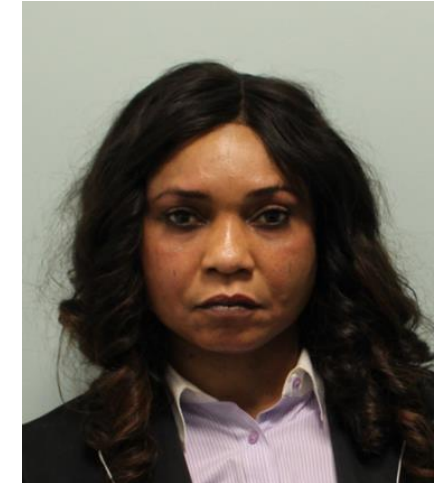
Extra Territorial Jurisdiction
Case Study - Trafficking for Sexual Exploitation





Josephine IYAMU

- AKA: Madame Sandra
- Date of Birth: 12/09/1966
- Place of Birth: Liberia
- British Citizen: 2009(extra territorial jurisdiction)
- Employment: Registered NHS agency nurse
- Address: London(Property worth £300,000)





Property in Nigeria





What is Ju Ju ?

- Juju is a spiritual belief system.
- Juju charms and spells can be used to inflict either bad or good luck.
- A Juju priest is highly respected across West Africa and can be used to take control of the victim's spirit.
- Juju can be used to exert a level of insidious control many experts describe as more powerful than chains.
- Victims fear madness, infertility and death if they break the oath



Ju Ju Ceremony?

- Introduced to Juju (voodoo) priest
- Subjected to Juju rituals and oath taking ceremony.
- They were given blood containing worms to drink.
- A chicken used to hit them on their naked backs and chests.
- They ate the heart of the chicken which had been killed.





What is Ju Ju ?

- Knives and razor blades used
- Juju will impregnate them
- Water would flow from their vaginas and men would run away from them.
- Told they could not send money home until they had repaid the money to Madame Sandra





Victims Journey.....

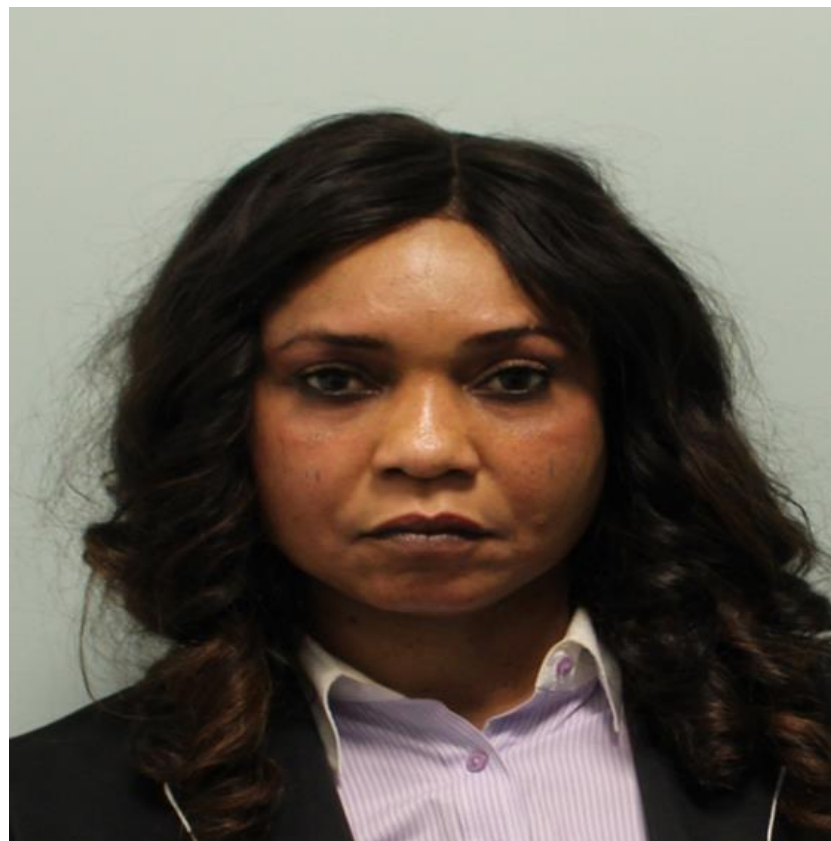


Shot at
Limited Food
Raped
Assaulted





18 YEARS IMPRISONMENT





Successes

- Use of the extra territorial jurisdiction within the legislation.
- Joint working between all countries – Nigeria, UK and Germany (victim care).
- Early consultation and allocation of prosecutors in all countries
- Use of covert tactics to corroborate victims – could have prosecuted victimless if needed to
- Confiscation Order - £183,806



	Course Name	Description	Duration
1	An Introduction to Modern Slavery and Human Trafficking – Awareness	Modern Slavery awareness	1 day
2	Modern Slavery and Human Trafficking - Advanced Practitioner	Follow on course from course one Advanced understanding of modern slavery	1 day
3	Modern Slavery Investigator and Practitioner	Specialist law enforcement and key partner investigator training	4 days
4	Victim Engagement and Interview	Specialist training to address the complexities of victim engagement and basic interview skills	1 day
5	Victim Liaison Officer (VLO)	Training for practitioners responsible for victim care and engagement	2 days
6	Specialist Sexual Exploitation, Risk Management & Intervention	Investigation, risk management and intervention in off street sex work settings	1 day
7	Labour Exploitation	Investigation of labour exploitation in all sector and markets including the adult care sector	1 day
8	Child Sexual Exploitation and Abuse (CSEA)	Specific to child exploitation and abuse	1 day
9	Child Criminal Exploitation (CCE)	Specific to child criminal exploitation such as county lines	1 day
10	Exploitation of Vietnamese national's	Exploitation into labour markets and for criminal activities	1 day
11	Criminal Exploitation & the Section 45 Defence	Specific to adult criminal exploitation	1 day

Please note that the one-day specialist courses are intended as additions as part of the advanced practitioner and investigator course to enhance learning. As part of their consultancy services MAGE can provide bespoke learning that is unique to your own learning needs. Please email us to discuss at: info@mageconsultancy.co.uk

Tackling Modern Slavery Together





On A MISSION

Modern Slavery

Working towards a slave-free supply chain



Sarah Jayne-Jenkins

HR Manager – Supply Chain Operations

10 Years Service

PLASP Member since 2021

Sarah.Jenkins@Boohoo.com

Karen Cross

People Business Partner – Supply Chain Operations

03 Years Service

PLASP Member since 2022



Introductions

Boohoo Group PLC

Working towards a slave-free supply chain

2 MILLION sq ft site, set within the heart of Burnley, Lancashire.

Biggest Employer within the local area

Expanded in 2017, the building was kitted out with **5,818 Solar Panels**.
The largest installation project in the UK



Headcount population of 1300 permanent colleagues

39 Different Nationalities across site.

Top 5 Nationalities:
Pakistani, British, Bulgarian, Romanian and Polish.

AGE:
Highest population of colleagues are aged between 26 – 35

Service:
The average length of service within UK1 Operations is 4.6 years.

Boohoo Group PLC Supply Chain Operations

£120m invested in Automation

6 Modules capable of processing 6k units per hour!

Despatch 200k Units every single day
(73M Units every Year)

Reaching volumes of up to 440k Units every day across Peak Trading Period

Next day Cut off is 23.00 daily

24 Loading bays and 11 Carrier Service Providers



Key Operational Statistics

Supply chains can be **high-risk** areas for modern slavery.

As people leaders, we have the ability to take proactive steps within our influence to mitigate the risks of Modern Slavery.

This is achieved through Effective Processes,
Increased Awareness
and
Business Education.

Creating a **Safe** and **Inclusive** workplace for all.



PURPOSE & VISION

Working towards a slave-free supply chain



Duplicate Bank Details

Multi-Occupancy Address

Next of Kin Data

Emergency Contact Data

Mobile Contact Numbers

Colleague Welfare Conversations

Statements of Intent

Online Right-Checks

In Person Imposter Checks

Implementing Thorough Audits

STATEMENT OF DECLARATION OF INTENT

By Name

DATE _____

I **NAME PAYROLL NUMBER** employed in the job role of ***** and currently a member of ***** TEAM

Hereby declare that

In my own decision & my own free will, I am residing at the residence of ADDRESS and I reside with

NAME	RELATIONSHIP
NAME	RELATIONSHIP
NAME	RELATIONSHIP
NAME	RELATIONSHIP

I also declare that I understand this STATEMENT OF DECLARATION OF INTENT is to be and is going to be considered a binding request and it will be acted upon, until or unless I personally ask to change that

In the form of a new, updated STATEMENT OF DECLARATION OF INTENT

Furthermore, I also declare the above information is true and accurate to all intents, constructions, and purpose.

Full Name	
Address	
Contact Number	
Email Address	
Account Number	
Sort Code	
Date	
Signed	

Enforcing Strong Processes



PLASP Pan-Lancashire Anti-Slavery Pledge

Pledge at PLASP



BUREAU
VERITAS



Slave Free Alliance Modern Slavery Audit

Unannounced 2-Day Full-Site Audit

Colleagues: Agency: Sub-Contractors

Induction

Training

Cultural

Management

Welfare

Career Progression

Pay

MS Escalation Process

Slave Free Alliance Modern Slavery Findings

No Modern Slavery on-site

Colleagues have noticed a positive change within the management team

Colleagues feel heard

Monthly right-to-work audit checks are really good

Mental health first aiders across all shifts are fantastic, consider extending to wider sub-contractors

The T2P model is great! We should make more noise and raise awareness of this

Re-branded your voice is good

Colleague integrity line "Speak up" is great

Building Strong Partnerships

SPOT THE SIGNS OF MODERN SLAVERY



WORK

- False job promises
- Very long shifts
- No equipment provided
- No contract/payslip

MONEY

- Little or no pay
- Money controlled by someone else
- Money owed to someone else

TRAVEL

- Transported to and from work
- Travel to UK paid and organised by someone else

WELLBEING

- Threats to the person or their family
- In fear of someone
- Isolated from others
- Signs of abuse/mistreatment

HOUSE

- Too many people
- Bad conditions
- Unknown address

ID AND DOCUMENTS

- No ID
- ID taken by someone else
- Fake ID given

TO REPORT A CONCERN,
CALL MONDAY - FRIDAY (9AM - 5:30PM)

0300 008 8000

Alternatively call the Modern Slavery Helpline (24/7):
08000 121 700

Scan me for
more information



Modern Slavery Questionnaire



BOOHOO – MODERN SLAVERY PROJECT

2nd November 2023

Providing Continuous Education



Thank you

Influence what you can control and be the best at it



Tackling Modern Slavery Together



Tackling Modern Slavery Together Marek Krolik

Marek's contact details can be obtained through Sion Hall.



Tackling Modern Slavery Together



Tackling Modern Slavery Together Question and Answer Session



Tackling Modern Slavery Together



Tackling Modern Slavery Together Event Closing Remarks



Tackling Modern Slavery Together

