

Modern Day Slavery – Training Aid V1 2025 Version 1 16/03/2025

Slavery sounds like something that belongs in the past - something that most of us assume isn't even around anymore, particularly in the UK, where we pride ourselves on our world leading health and safety practices and protection of human rights.

But assuming that slavery is only part of our history is an illusion. It's actually rife all over the world, including the United Kingdom, and it's a serious crime.

The truth is, there's more victims of slavery today than there ever has been throughout history. Modern slavery is right under our noses. It's hidden in plain sight - on our high streets, in our shops, on building sites, in the restaurants we eat in, car washes, farms, factories, and even behind closed doors within families.

Cases of modern slavery and human trafficking have risen at a frightening rate over the last few years - with over 5000 reported cases in 2018, but then there are at least 136,000 suspected victims and that's just in the UK.

This course has been created to raise awareness of the types of modern slavery that exist today, the key signs to look out for, and how to prevent it, tackle it and report it.

It's a basic human right to be able to live freely, and we - as individuals and businesses - have a duty of care towards each other by helping to eradicate modern slavery.

So what is 'modern slavery'? These words are an umbrella term that covers:

- **Slavery** - where someone is dehumanised and bought, sold and owned as property
- **Servitude** - where someone is obliged to provide a service that's imposed on them, even if they are not technically under 'ownership'
- **Forced labour** - where a person is forced into completing work for little to no money, usually in very poor conditions. And,
- **Human trafficking** - which is when someone is transported from one location to another in order to be exploited or forced into work - this can be transportation between countries, cities, or even just streets

There are many different categories that sit within these types and they often overlap, so a victim of one type of slavery can often be a victim of two or three. The common thread is that the victims' mental wellbeing or physical safety (usually both) are exploited, threatened or abused, whilst their freedom is taken from them. Anyone can be a victim of slavery - man, woman or child, of any age or nationality.

Throughout this course we will be sharing case studies to raise awareness of the most common types and to show you how to spot the signs. The majority of cases fall into these broad categories that we'll start to look at in this section:

- Sexual exploitation
- Labour exploitation
- Domestic servitude, and
- Criminal exploitation

Case Study Number One

A family want to leave their home country to come to the UK but they have no way of gaining legal entry. They arrange to be brought into England by paying a fee to a group that transport migrants illegally. The group have no intention of exploiting the family or taking advantage of them once they arrive in the UK.

Do you think this is a case of human trafficking?

- This is not human trafficking.
- This is known as "smuggling" and it's an immigration offence.
- If the family are not being exploited it is not a case of modern slavery -
- although statistics tell us that they are at an increased risk of being exploited once they arrive in the UK.

Perpetrators and Victims

There are a few key things to bear in mind about the perpetrators and victims with cases of modern slavery - and these apply regardless of the type of slavery:

First of all, the victim is - or is intended to be - used or exploited for someone else's gain, without respect for the victim's human rights. The perpetrator can be operating individually, they may be running a business, or they can be part of a wider crime network. Adult victims often appear to give consent, but in reality they have no, or very few, ways to get out of the situation - they are normally controlled through a mixture of fear, lies, threats, financial restrictions, and physical and mental abuse. Child victims and certain vulnerable adults are not able to give informed consent in the first place, so no kind of manipulation or threat is needed for it to be a case of modern slavery. And victims are usually dependant on the perpetrator for basic needs - like food, shelter and clothing - and this makes it almost impossible for them to see or find a way out.

A perpetrator may...

- Find out personal information about the victim and then use threats against their family in order to manipulate and control the victim
- Use the victim's fears about their immigration status to control them
- Deceive the victim with false promises of legitimate jobs

Informed consent is when permission is granted in full knowledge of the possible consequences.

County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs. Importing areas (areas where the drugs are taken to) are reporting increased levels of violence and weapons-related crimes as a result of this trend. -*National Crime Agency*

If you would like more information, please see The National Crime Agency

The Law

In the UK, there are three pieces of legislation - one for England and Wales, one for Scotland, and one for Northern Ireland - that make modern slavery offences punishable by a maximum sentence of life imprisonment. If a victim of modern slavery has been forced into committing a crime, this legislation gives victims the opportunity to have a defence against being prosecuted themselves.

UK Legislation

- Modern Slavery Act (England and Wales)
- Human Trafficking and Exploitation (Scotland)

- Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland)

New sentencing guidelines for modern slavery offences

In October 2021 new sentencing guidelines under the Modern Slavery Act 2015 came into effect

Offences under the Act include including slavery, forced labour, human trafficking or an offence committed to facilitate human trafficking. Under the new guidelines, which apply to **England and Wales**, offenders in a leading role who expect substantial financial advantage and who expose victims to an extremely high risk of death will be given penalties of **up to 18 years**.

Case Study Number Two

A woman enters into an arranged marriage. Her husband tells her that she can't work anywhere else or leave the house without him, because she's needed at home to care for him and his ill mother. She works roughly 18 hours a day cooking, cleaning and completing other household chores without pay. Her husband controls her through mental abuse as well as physical violence.

Would you say this is a case of modern slavery?

This is a type of modern slavery called domestic servitude.

- The victim was kept in domestic servitude for two years before she tried to take her own life.
- After an 18 month investigation, her husband was given a two year prison sentence.
- Domestic servitude involves unreasonably long working hours - usually household chores - with little or no pay.
- Victims are usually unable to leave the house without the perpetrator and are often controlled through threats of violence, or actual physical or sexual abuse.
- Both adults and children can be victims of domestic servitude.

Case Study Number Three

Three people are trafficked from their home country to Northern Ireland where they are coerced into working in a nail bar. They are reliant on the owner for their food and accommodation. They are paid very little, at irregular times, and they aren't able to work anywhere else. Most of what they earn goes straight back into the owner's pocket as he claims they are indebted to him for their expenses. He controls the victims by threatening to have them deported.

What type of modern slavery do you think this is?

- This type of slavery is known as 'forced labour' or 'unfree labour'. It involves people working against their will under the threat of punishment.
- This involves working for little to no pay, in poor working conditions, and often with excessive pay reductions.
- When someone is coerced into paying off a debt (real or imaginary) with no control over the amount they have to repay, it's called 'debt bondage' or 'bonded labour' - and this is a common factor with modern slavery.

The Common Signs

You might feel like modern slavery just doesn't exist in the circles you move in - most of us assume this - but victims of modern slavery can be anywhere.

It could be the cleaner, a homeless person you pass on the street, the builder working on your house, or it could even be someone you know who is a victim of domestic servitude or sexual exploitation. Or financial exploitation for example. Someone you know could have a decent job, but they may have been forced into giving a perpetrator's bank details to their employer instead of their own - which means they are under threat of some kind and technically not being paid.

Usually, a victim of modern slavery can behave in ways that seem unusual, or their circumstances may strike you as odd. Even though each person and case is different, so the signs can vary, there are a few red flags that we'll cover now. If you suspect that you're interacting with someone who may be a victim, you may notice that they:

- Do not know their own home or work address
- Be distrustful of the authorities
- Have limited social interaction - they may avoid eye contact, not talk at all, or may only talk when certain colleagues or bosses are not around
- Have limited access to hygiene facilities and clean clothes, so this can show with their personal appearance
- Change the facts or their description of events if they're recounting a story
- Behave as if their movements and choices are controlled by someone else
- Have their passport and identity documents being 'looked after' by someone else
- Have unexplained physical injuries
- Have problems with substance misuse
- Have limited contact with their family
- Display inappropriate sexual behaviour
- Have a lack of access to medical care
- Show signs of ritual abuse and witchcraft (juju)
- Be forced, intimidated or coerced into providing services
- Believe they are being bonded by debt
- Have money deducted from their salary for food or accommodation
- Have experienced threats against themselves or their family
- Be in a dependency situation
- Have an unwanted or underage pregnancy
- Have sexually transmitted diseases
- Miss certain episodes of time
- Have limited/sporadic school attendance (under 18s)
- Or they may show signs of fear, anxiety, or trauma - such as PTSD.

<https://www.unseenuk.org/about-modern-slavery/spot-the-signs/>

Case Study Number Four

A married couple living in Wales advertise escort vacancies online. Two women accept the job and are flown from their home country into the UK - their tickets are paid for by the couple. The women are taken to a property in Cardiff where they see four clients a day, seven days a week, after the couple take photos of them and advertise their services online.

Not only are most of the women's earnings deducted by the couple, for rent and expenses, but their online profiles offer sexual services that the women have not agreed to. This type of slavery is known as sexual exploitation.

What other type of exploitation is taking place here?

Because a lot of their earnings are being taken to repay a debt, **debt bondage** is the other type of exploitation taking place. It's a very easy way for perpetrators to exert their control. With sexual exploitation, victims are coerced into sex work or sexually abusive situations. It's common for this to start by people being brought over to the UK with the promise of legitimate work that is unconnected to sex work. It's also common for individuals, regardless of gender or age, to be sold into some kind of sexual exploitation, such as forced marriage or prostitution.

Case Study Number Five

A 13-year-old girl is sold to human traffickers by her family and is transported from her home country and into the UK. The traffickers then sell her. She is kept in squalid conditions, fed very little and isn't clothed properly. She is forced into picking pockets seven days a week and the perpetrators take the money from her each evening.

What type of slavery is this?

This is **criminal exploitation**. This is when someone is forced into criminal activity against their will. More often than not, children and vulnerable adults are the victims. Other common types of criminal exploitation include coercing victims into growing cannabis and committing gang-related crimes. Criminal exploitation also includes perpetrators stealing a victim's identity documents to commit financial fraud. Criminal exploitation in the UK can also involve a UK resident being forced into a marriage so their spouse can gain immigration rights.

You and Your Organisation

Now you have a better understanding of modern slavery, we'll discuss what you and your organisation can do to help eradicate it. In this section we cover:

- How to report any concerns or suspicions
- Compliance with the Modern Slavery Act
- Working practices and policies
- Your organisation's supply chain

And we include a couple of extra case studies from two industries that are high risk for modern slavery.

Case Study Number Six

A construction worker is recruited abroad and travels to South East England after being offered a contract on a building site. He's heavily in debt and the salary he's been promised will help him and his family. When he arrives in the UK his employers take away his passport and force him to sign a contract. He is also forced into working unreasonable hours for minimal pay and the accommodation he's given is cramped and crowded. His employers threaten to harm his family, so he stays silent and continues to work.

What type of modern slavery is this?

This is **labour exploitation**. It's very common in the construction industry, although labour exploitation can exist in any workplace. It almost always starts with the false promise of legitimate work for a reasonable wage, until workers start working and then discover how bad the wage, demands and living situation is - if there is even a wage at all. Lower-skilled workers are particularly vulnerable in the UK, and so are those in financial trouble or people whose first language isn't English. Some may not even realise that the conditions they are working in are actually illegal.

https://www.antislaverycommissioner.co.uk/media/1071/ciob_modern_day_slavery_web.pdf

Compliance with the Modern Slavery Act

There is a provision in the Modern Slavery Act that requires certain businesses to produce a Slavery and Human Trafficking Statement. And once it's written they must put it in a prominent place on their website. This applies to any organisation that operates all, or part, of a goods or services business in the UK, if they have an annual turnover of over 36 million pounds. Any organisation that doesn't meet these requirements, for example, anyone that has an annual turnover below 36 million - can still choose to produce a statement.

In a nutshell, if an organisation is taking steps to ensure there is no modern slavery in their organisation, their UK supply chain, and their international supply chain if they have one, the statement must explain what these steps are. And if an organisation isn't taking any steps to combat modern slavery, they must be honest about this in their statement instead. If your organisation needs or wants to produce one, the aim is to be transparent about the practices and policies in your workplace, as well as those of the organisations you work with - it's about proving to your supply chain, potential new business and the public, that you're part of the fight to tackle modern slavery and human trafficking.

The Slavery and Human Trafficking Statement is a declaration of what steps an organisation is taking to combat modern slavery, including the steps they have taken over the previous financial year. These steps should be proportionate to an organisation's sector, size and operational reach.

Organisations that are already taking steps should state what work is already underway and what work is planned - and this should be built upon each year. There is no set rule on what the statement should cover and organisations aren't expected to guarantee that their supply chain is slavery-free. But in relation to slavery and human trafficking, it can include details about:

- an organisation's structure and nature of business
- an organisation's supply chain and the companies in it
- appropriate awareness training that is given to staff
- an anti-slavery and human trafficking policy
- due diligence processes
- risk assessments and how the risks are managed

And evidence of an organisation's effectiveness at ensuring human trafficking and slavery is not taking place in the business or anywhere in their supply chain. This can be measured against appropriate performance indicators.

The statement must be signed by the organisation's director and approved by the company's board if they have one.

Best Practice

Even though larger organisations are obliged to produce a statement as a minimum requirement, it makes good business sense for small and medium sized organisations to do the same. First and foremost, if due diligence is carried out within your own organisation as well as the companies you work with - they can shed light on any unethical practices they may come across, which quite simply, is the right thing to do. But it also has other benefits. Your workplace will not only avoid potential fines and prosecution, but if you choose to lead the way with a transparent supply chain, you'll be a company of choice. This will help to:

- Protect and attract valuable investors and partnerships
- Protect and enhance your reputation and brand
- Inspire loyalty and strengthen staff retention within your team
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And it will protect and grow your client base. More and more people are looking to do business with organisations that have high ethical standards - larger businesses especially - who have to legally prove they are committed to working with slavery-free organisations. That's why it's best practice to not only produce the statement and have it available on your website, but it's also best practice to make sure that this ethical approach extends to your policies, procedures, recruitment practices and general company culture. There's many things to consider. For example... who produces the coffee beans you buy? Who farms the food you eat? Who makes the uniforms you wear? Who employs the plumber, or the cleaners?

To get started you can:

1. Get a list of all your contractors, clients and suppliers
2. Review which parts of the supply chain are most at risk
3. Ensure appropriate protective measures are put in place, which can include:
 - Staff training to increase awareness
 - Anti-slavery clauses in agreements
 - Confirmation requests from suppliers to ensure their business and supply chains are free from slavery
 - Contingency plans for when a supplier is found to fall below the required standard

Employers: BEWARE

If your organisation is a small to medium sized business and you're acting as a supplier, be wary of signing an agreement with a larger company that has an anti-slavery clause - you need to ensure you have the resources and procedures to comply with its requirements. Blindly signing up to a large company's 'standard terms' could have a catastrophic impact on your finances and reputation.

Case Study Number Seven

A hotel owner travels abroad to his home country and promises people decent work and a better life in the UK. They arrive in Scotland and are taken to a remote area where they live and work in awful conditions. They are threatened and physically abused by the hotel owner and are forced into working at least 18 hours a day, seven days a week, to repay him for the 'sponsorship' he's granted them to live in the UK. This is, once again, a case of forced labour and debt bondage.

How many workers do you think come from overseas to make up the UK's hospitality workforce?

Overseas workers make up just under 25% of the UK hospitality industry. Some of these people are lured here with the promise of decent work but end up becoming victims of modern slavery. Hotels in particular can be used as halfway houses for traffickers moving their victims from one location to the next, and hotel rooms are commonly used for sexual exploitation.

Recruitment in hospitality

Recruitment processes pose a significant threat in the hospitality industry concerning workers from overseas. The processes are often multi-tiered. Hotels regularly subcontract recruitment to agencies, who then use other recruiters. With hotel management, their due diligence processes will often only go as far as the first tier of the recruitment process, which appears reputable, so they are ignorant of what's happened in the lower tiers of the process.

<https://www.shivafoundation.org.uk/tackling-human-trafficking-in-the-hotel-industry/>

Your Responsibility

Whether you are the person responsible for producing your company's statement or not, and whether you help conduct due diligence or not - you are still responsible for staying vigilant and reporting suspicious activity - whether you're at work or not.

Earlier on we looked at how a victim of modern slavery may behave and how they may appear, but it's crucial to remember that they may not even recognise themselves as a victim or realise that help is available, and even if they do, they may not want to talk to the authorities or get help. Which is where you come in. If you suspect modern slavery is taking place within your workplace, within your supply chain, or you see something suspicious outside of work - you need to pass this information on.

Victims may not realise they are victims

Victims can be traumatised and there are a number of reasons why it may be difficult for them to come forward or co-operate with the authorities. They may:

- Be unaware they are a victim
- Be unaware help is available
- Be restricted by a language barriers and/or mistrust their interpreter
- Have their movements controlled
- Fear the repercussions (for themselves or their families)
- Always be accompanied by a perpetrator
- Live in isolation
- Feel they are still better off than in their home country or home situation
- Fear deportation
- Have forced involvement in criminal activity and fear prosecution
- Feel controlled by witchcraft or 'juju'
- Have been manipulated into distrusting the authorities
- Blame themselves
- Feel ashamed

Or they may be experiencing Stockholm Syndrome, whereby they sympathise with and feel connected to the perpetrator in some way.

Reporting Your Concerns

If you know, or even just suspect, that modern slavery is taking place, you should call 999 if there is an immediate risk to someone's safety. Or you should call the police on 101 or the Modern Slavery Helpline if a risk is present, but it's not an emergency. You can also fill out a form, which can help the police if there's an investigation.

Some organisations require their employees to do this, but any employee in any organisation can fill one out if they want to.

Once it's completed it'll be passed onto the Home Office. This process allows the potential victim to remain anonymous unless action needs to be taken. However, any public sector workers need to follow their organisation's own safeguarding procedures, which will include filling out either a Duty to Notify form, or using the National Referral Mechanism framework (known as NRM) - this system is used to help identify and support victims.

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>
<https://www.modernslaveryhelpline.org/report>

Duty to Notify - Reporting Forms

To report a victim of slavery you can fill out a National Referral Mechanism (NRM) form if the victim is under 18, or if they are over 18 and agree to be identified. Alternatively, if the victim is over 18 and wishes to remain anonymous, you can complete a Duty to Notify MS1 (Notification of a Potential Victim of Modern Slavery) form.

Thank you for completing the training on Modern Slavery. We hope to have highlighted just how real and prevalent this inhumane practice is and why it's so important that we put an end to it.

We hope that you now have a curiosity about the products you buy and where they came from - about the contractors you employ, the hotels you stay in and the restaurants you eat in.

And we hope you feel confident at identifying the red flags, reporting suspicious activity and encouraging your workplace to produce a Human Slavery and Trafficking Statement - this will bring us much closer to removing modern slavery and human trafficking from workplace supply chains.

Never forget, your vigilance and your decision to take action are so important. Every human has the right to live freely, and so all of us - individuals, businesses and communities - have a responsibility to do what we can to look after each other and eradicate modern slavery.

Here's a few organisations, groups, charities and resources that are part of the fight against modern slavery:

<https://www.gla.gov.uk/who-we-are/what-we-do/>

<https://nationalcrimeagency.gov.uk/>

<https://www.antislavery.org/slavery-today/forced-labour/>

<https://www.ilo.org/global/about-the-ilo/lang--en/index.htm>

<https://www.redcommunity.co.uk/criminal-exploitation/>

<http://www.modernslaverypartnership.org.uk/stop-modern-slavery/>

<https://onefamily.org.uk/campaign/TACKLING%20HUMAN%20TRAFFICKING>

<https://www.unseenuk.org/news/55>

[Pan-Lancashire Anti Slavery Partnership \(PLASP\) Toolkit – Adults Safeguarding Blackburn with Darwen Borough Council](#)