



Home Office

# Human Trafficking practical guidance



# Practical guidance

## What is human trafficking?

Human trafficking is a global crime which affects individuals and businesses worldwide.

The International Labour Organization estimates that there are almost 21 million people in forced labour, including forced sexual exploitation. Of those 5.5 million are children. Men, women and children are exploited from all over the world and, in the UK alone potential victims have been identified from over 90 different countries. Traffickers will exploit individuals, for profit, in a number of ways: sexual exploitation, labour exploitation, and criminal activities including forced begging or cannabis cultivation.

In many instances traffickers will increase the control they have over individuals by placing them in debt bondage, making them work to pay off the money they owe the trafficker.

Small businesses through to multi-national companies could be implicated in instances of exploitation and human trafficking if they do not make the necessary checks or take appropriate precautions. Thoroughly checking supply chains and recruitment agencies will ensure that the potential for human trafficking to occur is significantly reduced.

## The risk to reputation and profit is real.

As an employer, manager or colleague you have a responsibility to ensure that your employees and fellow workers are safeguarded, treated fairly and with dignity. You must operate effective due diligence – turning a blind eye is not an option.

# What signs might indicate that someone may be a trafficking victim?

Victims are trafficked all over the world for little or no money – including to and within the UK. They can be forced to work in the sex trade, domestic service, forced labour, criminal activity or have their organs removed to be sold.

There is no typical victim and some victims don't understand they have been exploited and are entitled to help and support. Victims are often trafficked to a foreign country where they cannot speak the language, have their travel and identity documents removed and are told that if they try to attempt an escape, they or their families will be harmed.

Key indicators of trafficking include:

- Is the person in possession of their own passport, identification or travel documents? Are these documents in possession of someone else?
- Does the person act as if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
- Was the person recruited for one purpose and forced to engage in some other job? Have transport costs been paid for by facilitators, whom they must pay back through working or providing services?
- Does the person receive little or no payment for their work? Is someone else in control of their earnings?
- Does the victim have freedom of movement? Are they dropped off and collected from work?
- Is the person withdrawn or do they appear frightened?
- Has the person or their family been threatened with harm if they attempt to escape?
- Is the person under the impression they are bonded by debt, or in a situation of dependence?
- Has the person been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities?

- Can the person freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

This list is not exhaustive. Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of trafficking. Often you will build up a picture of the person's circumstances which may indicate that something is not quite right. If you have a suspicion, report it.

## What should I do if I suspect someone is being trafficked?

If you think that someone is in immediate danger call 999. The Metropolitan Police with Stop the Traffik have a **24 hour hotline for victims** to call or to report suspected trafficking. The number is **0800 783 2589**.

For England and Wales, please call The Salvation Army **24-hour confidential Referral Helpline** on **0300 3038151** anytime of the day or night to refer a potential adult victim of trafficking or to receive advice. For potential child victims of trafficking please call your Local Authority Children's Services or the NSPCC Child Trafficking Advice Centre on **0808 800 5000**.

Northern Ireland and Scotland:

Migrant Help - **07766 668781**

Scotland: TARA - **0141 276 7724**

Not all victims may want to be rescued and there may be instances where reporting a suspected trafficking case puts the potential victim at risk.

## As an organisation

1. Put in place clear policies – preventing exploitation and human trafficking, and protecting your workforce, profits and reputation, makes good business sense.
2. Be clear about your recruitment policy, for example, by requiring your recruiting managers to only use specified reputable recruitment agencies.
3. Check your supply chains – the longer your supply chain the more opportunities there are for exploitation and poor practice. Tell the companies you are doing business with that you are not prepared to accept any form of exploitation.
4. Check your supply chains – can you account for each step of the process? Do you know who is providing your goods and services and do you have the right mechanisms and processes in place to check?
5. Lead from the top – make the appropriate checks on all employees, recruitment agencies, suppliers and subsidiaries to make sure that you know who is working for you.
6. Ensure that you have in place an open and transparent grievance process for all staff including agency workers.
7. Be pro-active – raise the awareness of your workforce so that they know what you are doing to promote your business and their welfare.
8. Make a clear statement that you take your responsibilities to your employees and your customers seriously. You could do this by making a statement on your website or as part of your company reporting on how you are protecting your workers, by taking reasonable steps to ensure that you do not employ someone who is being exploited.

## As a recruiting manager

1. Make sure that you follow company policy and only use agreed reputable recruitment agencies, specified by your HR department.
2. Make sure that you undertake background checks on agencies used to recruit or supply staff: do they have a good reputation? Have you used them before? Do the staff they provide have the appropriate paperwork?
3. Check that all staff, including agency workers, have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
4. Make sure staff are legally able to work in the UK. Does the recruitment agency provide assurance that the appropriate checks have been made on the person they are supplying?
5. Check the names and addresses of those working for you. If you have a number of people listing the same address it may indicate high shared occupancy, often a factor for those being exploited.
6. Make sure your workers know their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
7. If you suspect that someone is being exploited seek advice. A list of numbers is provided on page 5.

## As a manager

1. Ask questions of your employees – they may tell you something that might indicate they are in an exploitative situation.
2. Has a worker described a situation which appears odd? Do they pay for accommodation, food, transport or other services to a third party or agency?
3. Does the worker get picked up and dropped off at work each day. Do they appear to be under the control of someone else?
4. Often victims are physically abused. Does the worker have any injuries which appear consistent with abuse or maltreatment? Does the person appear scared or frightened? Can they speak English?
5. A worker may indicate the withholding of wages or excessive wage reductions, which violate previously made agreements.
6. Keep an eye on workers who are seeking to work excessively long hours or want to work on rest days. Make sure that the hours actually worked match the hours recorded.
7. Raise the awareness of your workers, by discussing issues and providing training, so that they can spot the signs of trafficking and exploitation and know what to do.
8. Use your experience and professional judgement to gauge situations.

## As a front-line worker

1. Keep your eyes and ears open. If you suspect that someone is being controlled or forced by someone else to work or provide services, tell someone.
2. If an unknown person appears to be monitoring the movements of a worker or appears to be controlling them in some way, tell someone. This may include the worker being collected and dropped off at work each day.
3. If a colleague tells you something you think might indicate that they are being exploited or ill-treated speak to your manager, or seek further advice. Talking to someone about your concerns may stop someone else from being exploited or abused.
4. Often victims are physically abused. Does the person you are concerned about have any injuries which appear consistent with abuse or maltreatment? Do they appear scared or frightened?
5. People may try to use business premises to traffick people. Be alert and report any suspicious activity.
6. Seek advice from your manager, and challenge corporate behaviour if you think that your employer is not doing enough to prevent people from being exploited.
7. If you think that a situation is not right, ask questions and report any concerns or suspicions you have.

## As an inspector

1. When entering the property, is the owner evasive or appearing to buy time so that illegal or trafficked workers can exit the property?
2. Is the property in poor condition? Wiring may be exposed; private areas may be dirty and unhygienic; sanitation may not be suitable.
3. You may be prevented from accessing some parts of premises. Is there evidence of someone living at the property, either in unsuitable accommodation or in overcrowded conditions?
4. Is the correct equipment provided to undertake the job in hand? Do workers have the correct clothing or protection equipment?
5. Workers will often be threatened with violence towards themselves or their families. Do workers appear frightened? Is there any evidence of threats or actual physical harm to the worker?
6. Do workers have access to suitable bathroom or hygiene facilities? Are they confined to a small part of the building?
7. You may visit an address where there is multiple occupancy. This could be an indicator of trafficking. Do the living conditions of the occupants raise any concerns?
8. You may make a number of observations which suggest something is not quite right. Don't assume that it is nothing. If you have concerns report them.

Don't Panic, take a balanced view, if something doesn't seem right report your concerns using the telephone numbers provided on page 5.



