



University of  
**Nottingham**  
Rights Lab

# **Modern slavery: What can small businesses do? A guide**

2021



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# About this report

Research shows that small businesses are more likely to engage in social responsibility issues when linked to their community. Businesses have an important role in our communities as employers, purchasers, suppliers, and neighbours, and therefore can have a significant part to play in local anti-slavery action.

Small businesses are the lifeblood of our economies. In the UK, they account for 99% of businesses. They are the eyes, ears and heart of our communities and are in a unique and critical position to help raise awareness of, and address, modern slavery at the local level.

This document is the result of work and conversations with small businesses on modern slavery as part of the University of Nottingham’s Small Business Engagement Award. The award is designed to enable University of Nottingham academics to engage in knowledge exchange with small and medium-sized enterprises.

The researchers hosted an event with small local businesses (part-funded by the European Regional Development Fund 2014-2020) to better understand support they wanted to engage in the anti-slavery agenda. While most business leaders expressed a desire to help tackle this issue, concerns were raised around the lack of resources, capacity and knowledge. Consequently, the research team worked with business leaders to develop this document.

This document aims to support small businesses who want to better understand modern slavery and how they can help address it in their business and communities. It is written for small businesses who would like to engage in anti-slavery action but do not know where to start, or who may not have the same level of resources or capacity as larger organizations.

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In the UK, the most common nationality of potential victims referred through the National Referral Mechanism (NRM) – the UK’s system for identifying and supporting victims – are UK nationals, followed by Albanian and Vietnamese nationals.

### How is modern slavery distinct from other forms of poor labour and employment practices?

Modern slavery exists on a spectrum of exploitation. It involves the use of deceit, fraud, coercion and/or abuse of power to enslave an individual. In the case of modern slavery, individuals may be unable to walk away. Control may be physical, but physical constraints will not always be necessary to exert control over a person. Other forms of control include withholding of identity documents, debt bondage, withholding of wages, the threat of denunciation to authorities (where individuals have unlawful status), threat or actual violence, forced criminal activities, and psychological abuse.

### What is the nature and scale of Modern Slavery in the UK?

The Global Slavery Index estimates that there are 136,000 victims of modern slavery in the UK. In 2020, the NRM identified over 10,000 potential victims of modern slavery and human trafficking.

The UK government has identified 17 types of modern slavery offences aggregated into four categories: labour exploitation, domestic servitude, sexual exploitation and criminal exploitation.

Labour exploitation is the most common purpose for which people are exploited and it comes in many forms. For example, victims may work for offenders or they make work for someone other than offenders (such as being employed in legitimate jobs with lawful working and employment conditions).

Women, men and children are exploited in numerous sectors such as nail bars, construction, car washes, hospitality (such as hotels and restaurants), and agriculture, to name a few.



### How do business activities contribute to modern slavery?

Business activities can cause, contribute or be linked to cases of exploitation. Supply chains can be difficult to trace, and goods and services manufactured and/or used by businesses may have been produced using slave labour.

Businesses can also be implicated via their labour supply chains particularly when labour or services are outsourced via third-party labour providers or agencies. Companies may choose to outsource services or employ labour through subcontractors to improve the efficiency of their operations and lower the costs of labour. However, such practices distance companies from the workforce and increase the risk of unlawful and exploitative labour and employment practices. For instance, in the case of outsourced labour, unscrupulous recruitment agencies may exploit workers in a number of ways: by forcing them to pay unlawful recruitment fees; having workers sign a contract they do not understand or agree to misleading working terms and conditions they would not have otherwise agreed to if they were aware of the true nature of the work; withhold a worker’s wages; retain their passports and identity documents to restrict their movement and compel them to work; and/or impose a debt on workers for loans with increasing interest rates. In some sectors, such as hospitality, businesses may find themselves linked to modern slavery where their premises are used as sites to exploit people.

### What is the UK doing to tackle Modern Slavery in supply chains?

The UK has implemented a number of measures to tackle modern slavery. Most notably, in 2015, it introduced the [Modern Slavery Act 2015](#), which was the first legislation of its kind to specifically address this problem. Section 54 of the legislation requires companies with an annual turnover of £36 million or more to publish a modern slavery and human trafficking statement outline the steps they are taking to prevent modern slavery in their activities and supply chains.



### Case study 1: Wales

In 2014, a man was jailed for forcing a vulnerable man to work unpaid on a farm near Newport, Wales. The victim, a Welsh man with learning disabilities, was forced to work up to 16 hours a day without pay for 13 years. Throughout 13 years, he only had two days off. He was forced to live in a rat-infested caravan without adequate facilities.

Image from the series The Dark Figure\* by Amy Romer. amyromer.com

## Why should small businesses engage in the anti-slavery agenda?

Businesses of all shapes and sizes can be implicated by modern slavery due to the goods and services that are produced and procured. **No industry or business can be immune to modern slavery practices.**

As larger organisations now have a legal responsibility to report on actions taken to address modern slavery, this responsibility is being cascaded down to their suppliers and contractors to also demonstrate their own approach to tackling modern slavery. In fact, government and the public sector increasingly expect suppliers to demonstrate awareness and knowledge of the issues around modern slavery and be appropriate and proportionate in their response.

**Consumers are also becoming more ethically and socially conscious in their purchasing decisions and are seeking out companies whose values align with their own.**

Separately, due to their prevalence in the economy, small businesses have an important role in our communities as employers, suppliers, purchasers, and neighbours, and therefore can help with identifying exploitation, supporting survivors and making their communities sustainably slavery free. While small businesses are likely to face barriers, such as lack of resources and knowledge, to engage in the anti-slavery agenda, their contribution no matter how small, is important for tackling this issue. Small businesses can make great strides in tackling modern slavery.

## Case study 2: London

In 2015, a couple – a doctor and nurse – in London, were convicted for enslaving a Nigerian man for 24 years. In 1989, they brought him to the UK without his parents’ consent. He was promised the chance to help look after their house in exchange for payment and access to education. For 24 years, they made him work over 15 hours a day with no payment and he was not allowed to go to school. They controlled every aspect of his life such as when he could leave the house and used surveillance to monitor his every move when they were away on holiday. While the victim stayed in their house, he did not have access to certain rooms and was forced to sleep on the floor, despite them having a spare room.



Image from the series The Dark Figure\* by Amy Romer. amyromer.com

## Case study: Chariot Office Supplies Ltd

As a supplier to the University of Manchester and several other corporate organisations, we were invited to join the Greater Manchester modern slavery a human trafficking networking meeting, to start our journey in understanding how our business, our suppliers, and our staff, can make an impact on tackling these terrible crimes.

The first step was to share the information and knowledge we had gained with our staff, so we created a file for the staff room with information and examples of modern slavery. This has also become part of our ongoing training by sharing any new pieces of information we gain with the team. We also created our own modern slavery statement based on that of our corporate customers, to ensure we were making the relevant steps to back up their efforts. We then created a questionnaire to send to our suppliers to investigate the steps they are taking to ensure modern slavery is not happening within their business or supply chain. We made it very clear from the outset that if any cases were found, we would work together to ensure the right support was on hand to deal with the situation.

When we engaged with this issue as a business, it brought us closer to our community and we have now built a strong relationship with a local charity who directly support people who are affected by modern slavery and other difficult challenges. By supplying our goods at cost it has enabled the charity to help more people as their budget has now stretched further.

Chariot are seeing commercial benefits through our efforts to tackle modern slavery. It has always been a challenge for corporate organisations to link up with these issues and by choosing Chariot as a supplier, the money they are spending is reaching the heart of the local community which has helped to strengthen our customer relationships. We have seen a boost in staff morale and pride as we see our work making a difference locally.

We have continued to engage with the University of Manchester who have helped us to take real ownership of this issue and make tackling modern slavery part of our business. We have since encouraged more businesses to start talking about modern slavery with their staff. We have also engaged with local charities and have given direct support to victims of modern slavery.

“ We made it very clear from the outset that if any cases were found, we would work together to ensure the right support was on hand to deal with the situation.”

# Signs of modern slavery

There is no one sign that can indicate a case of modern slavery. Signs may also vary depending on the type of exploitation that individuals are subjected to. However, general indicators that someone might be a victim include:

## Physical signs.

Potential victims may look neglected, malnourished, or have visible signs of injuries that may have been caused by abuse. They may have very few personal belongings and/or wear the same clothes every day.

## Behavioural signs.

Their body language may suggest that they are fearful and anxious. They may avoid contact and reluctant to speak to authorities or other people. They may be unable to communicate freely, someone may always speak for them, or victims may act as if they are instructed by another.

## Working conditions.

Victims may be working against their will. Victims may be working without a contract, not be paid the national minimum wages, may not be paid at all or may not have access to their money or bank account. They may disclose that they are working to pay off a debt. They may work excessively long hours, not allowed breaks at work or experience restrictive terms and conditions of work. They may lack adequate personal protective equipment and gear to carry out their role safely. They may share the same address as other workers and may depend on their employer for transport to and from work.

## Living conditions.

Victims may live in cramped and squalid accommodation. Accommodation may be provided by their employer and may also be located on or off-site.

## Restricted freedom.

Victims may not have identification and/or travel documents such as passports and this may be withheld. Victims may also not know their home or work address. They may have limited contact with others outside of their immediate working environments such as family and friends.

For further information on spotting the signs of modern slavery, please visit [Unseen](#), [GLAA](#) and [Justice and Care](#).

## Case study 3: Lincolnshire

In 2017, a family in Lincolnshire was jailed for exploiting and enslaving 18 men aged between 18 and 63. The family targeted people facing learning disabilities, mental health issues, homelessness and addictions. The men were forced to work for the family's tarmacking company. The victims were housed in dirty caravans without adequate facilities such as running water, heating or toilets. They were abused and were compelled to work long hours, usually without a break and in some cases were not given food or drink. Payment was often not monetary and in some cases, the victims were given cheap alcohol as payment which further increased addictions and susceptibility to control.

Image from the series The Dark Figure\* by Amy Romer. amyromer.com



# Top tips for small businesses wanting to help tackle modern slavery

## Education and awareness

- ✓ Actively seek opportunities to increase your knowledge and awareness of modern slavery. See our list of resources on page 17.
- ✓ See what other businesses, particularly, small businesses are doing to engage in the anti-slavery agenda to help inform your own action.

## Knowledge-sharing and collaboration

- ✓ Share knowledge and raise awareness of modern slavery to your business networks, employees (if any) and wider personal networks.
- ✓ See what your community is already doing to help address modern slavery to identify available resources and support and how you could engage. For example, many communities have anti-slavery partnerships where businesses can become involved in local action, events and networks.

## Taking action

- ✓ Make a public commitment or pledge to tackle modern slavery in your business and community.
- ✓ Think about whether there are places or circumstances where you may come into contact with people who are vulnerable to exploitation in your daily business. Ensure you are up to date on how to recognize signs of exploitation.
- ✓ Keep abreast of campaigns on modern slavery and consider how your business can help engage (for instance, through your customers, social media presence, contacting your local member of parliament).
- ✓ Ensure that the employment of the workforce and recruitment practices, including those, directly and indirectly, employed, comply with relevant labour and employment regulations such as national minimum wage, health and safety, and working time. Additionally, seek opportunities to engage with workers to understand their experience of work.
- ✓ Think about whether there are opportunities for your business to help support survivors of modern slavery such as supporting them in developing the confidence and skills to secure a sustainable income. Look at the Bright Future programme for inspiration.
- ✓ Ensure that you adopt an ethical approach to your purchasing practices. Goods and services that are abnormally low in price may indicate that suppliers are undercutting labour and employment standards.

- ✓ Establish key performance indicators relating to modern slavery. These are quantifiable measurements used to measure the effectiveness of an organisations anti-slavery action and can help you keep track of any actions taken. This could include for example, the number of modern slavery training given to employees, the number of suppliers engaged (for instance, by signing your companies' supplier code of conduct), anti-slavery campaigns undertaken, contributions made to community initiatives, and any other activities undertaken.
- ✓ Document and publicly report on the steps that you are taking to address modern slavery in your business and communities.

# Top tips for anti-slavery actors wanting to engage small businesses in community-based anti-slavery initiatives

## Education

Anti-slavery agencies should aim to educate small businesses on the problem of modern slavery. Educational activities should cover the nature and scale of modern slavery internationally, nationally and locally within communities. Activities should be aimed at educating businesses on the spectrum of abusive practices that exist within the supply chain and communities. This includes lower-level forms of labour and employment abuses to more extreme forms of exploitation such as modern slavery.

## Practical measures

Guidance, tools and frameworks developed to tackle modern slavery should be tailored to smaller businesses and take into consideration their unique diversity and capabilities. This would increase opportunities for smaller businesses wanting to help prevent modern slavery. Measures should include examples of good business practices by businesses of all shapes and sizes. Doing so will demonstrate what good practice looks like and practical measures that can be implemented by small businesses.

## Building trustful and sustainable relationships

To improve engagement with small businesses, anti-slavery agencies should work on building trustful and sustainable relationships with business professionals and facilitate opportunities for them to engage in collective action. This includes opportunities to co-create approaches to addressing modern slavery. Tapping into business networks to raise awareness of modern slavery and encouraging businesses to share local concerns and improving standards could help fill critical regulatory gaps. Anti-slavery agencies should encourage a culture of transparency where businesses can openly communicate their issues and concerns on modern slavery.

## Partnership

Strategies for engaging businesses should be championed through community networks, trade associations, unions and local partnership groups. Enforcement agencies and NGOs frequently work in partnership with communities to develop anti-slavery partnerships show that although many are keen to involve more businesses, examples of effective engagement remain rare. Anti-slavery agencies should therefore facilitate opportunities for businesses to collaborate with relevant organisations.

## Incentivising engagement

Actors should also support small businesses by providing educative resources that are accessible and work with business professionals to determine appropriate incentives that can encourage engagement. Anti-slavery agencies should be conscious of the type of businesses they are trying to engage, taking into consideration their size, capabilities and sector. It is important for agencies to develop an understanding of potential barriers and limitations, demonstrate sensitivity to these issues, and tailor incentives and approaches to engaging businesses accordingly.

“Anti-slavery agencies should be conscious of the type of businesses they are trying to engage, taking into consideration their size, capabilities and sector.”

## Case study 4: Nottingham and Derby

In 2018, a family was jailed for forcing Hungarian women into sex work in pop up brothels across Nottingham and Derby. The family rented flats near shops, and rooms in a Hotel in Nottingham City Centre. The family falsely promised victims the opportunity to work in other jobs. However, on arrival to the UK, they were forced into prostitution with services being advertised online via adult websites.



Image from the series The Dark Figure\* by Amy Romer. amyromer.com

# What to do if you suspect modern slavery

If you suspect that someone is a victim of modern slavery, please contact one of the following for advice and to report suspicions.

**Do not intervene or confront them as this may risk putting them or yourself in danger.**

- Emergency or threat to life situation, call 999
- **Non-emergency concerns:** call the **Modern Slavery Helpline – 0800 121 700** or visit [www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org) to report suspicions; call your **local police on 101** and ask for their modern slavery team.
- To report concerns about how workers are treated or to seek advice on labour exploitation or other labour abuses contact the **Gangmasters and Labour Abuse Authority (GLAA) on 0800 432 0804**. GLAA is the UK’s investigative agency working to protect vulnerable and exploited workers.
- Contact the **Salvation Army on 0800 808 3733**. The Salvation Army provides specialist support for all adult victims of modern slavery in England and Wales.

### What happens to potential victims?

Potential victims may be referred to the NRM. The NRM is the UK’s framework for identifying and supporting potential victims of modern slavery.

# Example of a pledge

## Local commitment

As leaders in **Local Area**, we, the undersigned, commit to doing everything in our power to make our City and County free of modern slavery. We will work proactively with national and local government, law enforcement agencies, businesses, the voluntary and community sector, faith bodies and our local communities to:

- ✓ Demonstrate strong local leadership for anti-slavery initiatives
- ✓ Raise awareness amongst our staff, associates and the people we serve on a daily basis
- ✓ Train our staff to recognise and respond appropriately to potential signs of slavery
- ✓ Share intelligence and information to help detect slavery and ensure it cannot take root
- ✓ Support victims and survivors in our communities
- ✓ Remove slave-based labour from our supply chains
- ✓ Contribute to building a prosperous and slavery-free local economy

## Business commitment

As an employer in **Local Area**, we commit to doing what is in our power to make our City and County free of modern slavery. The aim is to eradicate forced labour, modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour.

## Case study 5: Yorkshire

In 2016, a bed factory owner was jailed for forcing over 40 people to work excessive hours at Kozee Beds – a company supplying high street brands such as John Lewis and Next. The victims were mainly vulnerable Hungarian’s who were promised decent work and accommodation. The men were housed in a cramped and squalid two-bedroom house in Bradford. They were only paid £10 a week for their work.



Image from the series The Dark Figure\* by Amy Romer. amyromer.com

# Additional resources

To learn more about modern slavery and actions you could take, please visit the following resources:

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>■ Global Slavery Index: <a href="https://globalslaveryindex.org">globalslaveryindex.org</a></li> </ul>   | <ul style="list-style-type: none"> <li>■ Shiva foundation: <a href="https://shivafoundation.org.uk">shivafoundation.org.uk</a></li> </ul>  |
| <ul style="list-style-type: none"> <li>■ Rights Lab, University of Nottingham: <a href="https://nottingham.ac.uk/rights-lab">nottingham.ac.uk/rights-lab</a></li> </ul>   | <ul style="list-style-type: none"> <li>■ Shiva Foundation and Stop the Traffik SME toolkit: Available <a href="#">online</a>.</li> </ul>   |
| <ul style="list-style-type: none"> <li>■ Gangmasters and Labour Abuse Authority: <a href="https://gla.gov.uk">gla.gov.uk</a></li> </ul>   | <ul style="list-style-type: none"> <li>■ Modern Slavery Act 2015: Available <a href="#">online</a>.</li> </ul>   |
| <ul style="list-style-type: none"> <li>■ Anti-slavery partnership toolkit: <a href="https://iasctoolkit.nottingham.ac.uk">iasctoolkit.nottingham.ac.uk</a></li> </ul>   | <ul style="list-style-type: none"> <li>■ Human Trafficking and Exploitation (Scotland) Act 2015: Available <a href="#">online</a>.</li> </ul>  |
| <ul style="list-style-type: none"> <li>■ UK’s Independent Anti-Slavery Commissioner: <a href="https://antislaverycommissioner.co.uk">antislaverycommissioner.co.uk</a></li> </ul>   | <ul style="list-style-type: none"> <li>■ UK government transparency in supply chains guidance: Available <a href="#">online</a>.</li> </ul>  |
| <ul style="list-style-type: none"> <li>■ UK government modern slavery resources: Available <a href="https://gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page">gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page</a></li> </ul> | <ul style="list-style-type: none"> <li>■ Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. Available <a href="#">online</a>.</li> </ul> |
| <ul style="list-style-type: none"> <li>■ Stop the Traffik: <a href="https://stopthetraffik.org">stopthetraffik.org</a></li> </ul>   | <ul style="list-style-type: none"> <li>■ Anti-slavery International: <a href="https://antislavery.org">antislavery.org</a></li> </ul>  |

■ Ethical trading initiative: [ethicaltrade.org](http://ethicaltrade.org)

■ Unseen: [unseenuk.org](http://unseenuk.org)

■ Supply Chain Sustainability School People Matter Charter: Available [online](#).

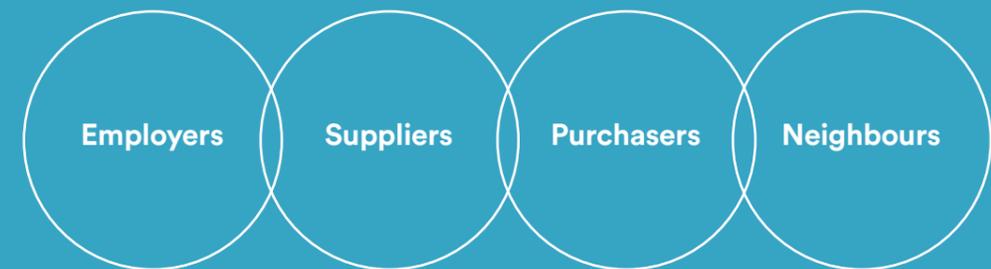
■ UK government Modern Slavery awareness and victim identification guidance. Available [online](#).

■ Campaigning for change: The Co-op's approach to tackling modern slavery and supporting victims. Available [online](#).

■ Bright Future. Available [online](#).

“

Small businesses have an important role in our communities as employers, suppliers, purchasers, and neighbours, and therefore can help with identifying exploitation, supporting survivors and making their communities sustainably slavery free.”



## Case study 6: Nottingham

In 2019, a couple faced modern slavery charges for bringing people from Poland to Nottingham to work at Sports Direct – the UK’s largest retailer of sporting goods. Despite the victims receiving £265 a week from Sports Direct, their exploiters controlled their bank accounts, took their money and only paid them between £20-45 a week (depending on travel expenses). Some of the victims reported that they were forced to sleep on the floor and often faced abuse and threats from their exploiters.



Image from the series The Dark Figure\* by Amy Romer. amyromer.com



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