

TACKLING MODERN SLAVERY IN THE HOTEL SECTOR ACROSS THE UK



Modern Slavery

This guidance has been produced for use within the Hotel and Hospitality Sector. It can also be used as a reference to assist anyone who comes into contact with individuals who may have been trafficked and/or are being exploited by people who wish to control their movements and actions to exploit them for sexual services or labour.

Modern slavery is the use of force, fraud, or coercion to compel a person to provide labour, services or commercial sex against his or her will. It is a form of modern slavery.

Minors under the age of 18 years induced into commercial sex are victims of sex trafficking—regardless of whether the trafficker used force, fraud, or coercion.

Slavery is one of the fastest growing criminal enterprises in the world—generating over £21 billion a year in profits. It is occurring internationally and locally, including within the travel and tourism industry.

If anyone has any concerns as to the immediate safety of an individual the police should be contacted.

Modern Slavery

Modern slavery is a global problem and international crime, affecting millions of people worldwide, including many victims within the UK. Men, women and children of all ages and backgrounds are victims of human trafficking, sexual exploitation forced labour, domestic servitude or debt bondage.

There are many ways that people can be exploited, forced to work for little or no pay. Types of exploitation include:

- Labour exploitation
- Sexual exploitation
- Domestic servitude
- Criminal exploitation
- Child Exploitation
- Human tissue/organ harvesting



Victims are controlled by force, threats, coercion, abduction, fraud and deception. Any form of 'consent' given by a victim in these circumstances is irrelevant – no person can have control over another person by these means.

What is Human Trafficking?

Human trafficking is the movement of a person from one place to another, within a country or across borders, into conditions of exploitation against their will.

It consists of three basic parts:

An action - the recruitment, transportation, transfer, harbouring or receipt of a person

A means - the threat or use of force or other form of coercion, abduction, fraud, deception, abuse of power, a position of vulnerability, the giving or receiving of payments or benefits to control a person for the purpose of

Exploitation – which can include slavery, forced labour or services, servitude, forced criminality, sexual exploitation or the removal of organs

Once initial control is secured victims are usually moved to a place where there is a market for their services. This is often a location where they lack the language skills or other basic knowledge which would allow them to seek help. There may be one person trafficking the victims or a number of different individuals. Victims may also be passed or sold to different traffickers.

What is Sexual Exploitation?

Sexual exploitation involves any non-consensual or abusive sexual acts performed without a victim's permission. This includes prostitution, escort work and pornography. Women, men and children of both sexes can be victims. Many will have been deceived with promises of a better life and then controlled through violence and abuse.

- ***National Crime Agency***

What is Forced Labour?

“All work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”.

- ***International Labour Organization***

Sexual and labour exploitation is sometimes hidden but often people are exploited in plain sight. Victims come from a variety of backgrounds – they may be UK citizens, EU migrants or from outside of the EU.

Modern Slavery Act 2015

The Modern Slavery Act 2015, draws together the offences referred to above. Modern Slavery offences in England and Wales (and Human Trafficking and related offences in Scotland and Northern Ireland) apply regardless of the victim's immigration status or entitlement to work in the UK.

People who are subject to modern slavery are typically made to work in sectors such as:

Hospitality and Catering Sectors

The Service Industry

Entertainment

Construction

Manufacturing (in sweatshops)

Agriculture

Food processing and packaging

The supply of labour to the Agricultural and Food processing and packaging sectors is regulated by the Gangmasters and Labour Abuse Licensing Authority.

What is Debt Bondage?

Victims of modern slavery may also be victims of debt bondage, where they are tricked into working for little or no money to repay a debt.

An employer or a person controlling them (such as an agent) will use different tactics to trap the victim in an endless cycle of debt which can never be repaid and may even be passed on to their families. Poverty, threats, violence, surveillance and imprisonment are used to make sure they cannot leave or get help.

Debt bondage can also be a significant factor in human trafficking. Victims may be offered a job abroad, to include either “free” transportation or borrowing money from the employer / controller for the travel and a job finding fee. Once they have arrived they then find the job either does not exist or is not what was originally offered, and are trapped trying to pay off the debt.



Spotting the signs

There are a number of indicators of trafficking and forced labour. Not all of the indicators will apply in every case, and some may not be immediately apparent.

Victims may be reluctant to tell their story through fear of reprisal or not being believed, through a feeling of shame about letting themselves be treated in this way, or because they do not know their rights and the treatment they are entitled to receive.



There are no set number of signs that will indicate that a person is a victim of trafficking or subject to forced labour. One or a combination of factors could suggest a person is a potential victim, so each case should be considered on an individual basis.

If during your engagement with a vulnerable and exploited person there is a belief that the indicators referred to within this guidance are being met you should seek assistance for that vulnerable person.

Hotels and Motels

Human trafficking is a crime in which traffickers seek to exploit others for profit or personal benefit. Traffickers utilize all available resources or venues to help facilitate their crimes, including hotels. Traffickers take advantage of the privacy and anonymity offered by hotels, and they are able to operate with low risk when hotel staff and the community are not aware of the signs of human trafficking.

Hotels are routinely used for sex trafficking where victims are compelled to provide commercial sex to paying customers. Victims may be forced to stay at a hotel where customers come to them (in-call), or they are required to go to rooms rented out by the customers (out-call). Moreover, sex trafficking victims often stay in hotel with their traffickers while moving to locations.

Hotels are also locations where labour trafficking can occur. Victims can be forced to work in hotels by unscrupulous subcontracting companies or can be part of sales crews forced to sell products from city to city and reside in hotel rooms while on the road. There have also been instances of hotel franchise owners directly engaging in human trafficking by fraudulently recruiting workers from overseas and compelling them to work under threats of and actual physical abuse.

With training and awareness about human trafficking, hotels are in a unique and critical position to:

- Identify potential victims of human trafficking
- Report it
- Educate staff and patrons about human trafficking and where to report
- Deter future situations of human trafficking at properties

The indicators outlined within the following pages should be seen as ways for identifying potential victims of human trafficking. These indicators were compiled based on actual cases, calls to the national hotline, and interaction with law enforcement as well as hotel staff.

The Indicators

Victims may:

- Be Under 18 and induced into commercial sex
- Show signs of physical abuse, restraint, or confinement
- Be subject to verbal threats

- Show signs of emotional abuse or dependency on another
- Show signs of malnourishment, poor hygiene, fatigue, sleep deprivation, changes in personality or behaviour
- Show signs of untreated illness, injuries, etc.
- Show signs of dissociation or avoidance of interaction with others, especially about sharing personal situation
- Have restricted, mediated, or controlled communication
- Have no control over or possession of money or personal identification documents
- Be dressed inappropriately for their age or has lower quality clothing compared to others they are accompanied by
- Have few or no personal possessions carried in small or plastic bags
- Appear to be with a significantly older “boyfriend” or in the company of older males
- Have no freedom of movement or be constantly monitored
- Be treated in a demeaning or aggressive manner

- Have no knowledge of current and/or past whereabouts
- Show signs of fear, anxiety, tension, submission, or nervousness
- Be unpaid, paid very little, paid only in tips, required daily/nightly quotas, or pay turned over to 3rd party
- Mention work conditions or wages being different from how advertised or promised
- Be foreign nationals threatened with deportation by those who control them
- Mention large or growing debts to another person
- Have suspicious tattoos or branding on women or girls
- Be within a group of girls travelling with older male or female



Location

Hotel employees are often in the best position to observe potential indicators of modern slavery offences, especially since their duties give them access to different areas of the properties. The following location indicators are divided into types of line employees who are in the best position to identify potential victims. These indicators are also likely to be visible to other employees as well as hotel or motel patrons.

Front Desk, Concierge, Porters, and Staff

Front desk, concierge, porters and staff are in a key position to observe activity that could indicate a potential trafficking situation. Please keep in mind that the presence of just one of these indicators does not immediately mean that human trafficking is occurring. Instead, it is important to be vigilant of situations in which you identify multiple indicators.

Indicators – may include

- Individuals checking into room appear distressed, coerced or injured
- Room paid for with cash or rechargeable credit card
- Few or no personal possessions carried in small or plastic bags

- Booking made for a group of people/minors by one person who controls all documents and exerts control by giving orders/instructions to those he/she is booking for
- Excessive use of hotel computers for adult oriented websites
- Patrons not forthcoming about full names, home address, or vehicle information when registering
- Minor taking on adult roles or behaving older than actual age (paying bills, requesting services)
- Patron appears with a minor that he did not come with originally
- Rentals of pornography when children are staying in the room
- Individuals dropped off at the hotel or visit repeatedly over a period of time
- Minor with patron late night or during school hours (and not on vacation)
- Individuals checking into room have no identification
- Room is rented hourly, less than a day, or for long- term stay that does not appear normal
- Patron request for information or access to adult services or sex industry

- Room rented has fewer beds than patrons
- Individuals selling items to or begging from patrons or staff
- Minor accessing business centre and frequenting social networking or sexually explicit website

Housekeeping and Room Service

Housekeeping and room service staff is in a key position to observe activity that could indicate a potential trafficking situation. Please keep in mind that the presence of just one of these indicators does not immediately mean modern slavery is occurring. Instead, it is important to be vigilant of situations in which you identify multiple indicators.

Indicators – may include

- “Do Not Disturb” sign used constantly
- Refusal of cleaning services for multiple days
- Excessive amounts of cash in room
- Smell of bodily fluids and musk
- Presence of multiple computers, cell phones, pagers, credit card swipes, or other technology
- Individuals leaving room infrequently, not at all, or at odd hours
- Children’s items or clothing but no child registered with the room

- Individuals hanging out in hallways or appearing to monitor the area
- Excessive amounts alcohol or illegal drugs in rooms



- Minors left alone in room for long periods of time
- Excessive number of people staying in a room
- Extended stay with few or no personal possessions
- Provocative clothing and shoes
- Men/women waiting in the lobby or outside of the room
- Constant flow of people to a room at all hours
- Individuals selling items to other patrons or staff
- Excessive amounts of sex paraphernalia in rooms (condoms, lubricant, rubbing alcohol, lotion, etc.)
- Individuals begging for money or food
- Rooms stocked with merchandise, luggage, mail packages, and purses/wallets with different names
- Individuals digging in hotel garbage or taking a lot of toiletries from housekeeping carts

Restaurant and Bar

Restaurant and bar staffs are in a key position to observe activity that could indicate a potential trafficking situation. Please keep in mind that the presence of just one of these indicators does not immediately mean that human trafficking is occurring. Instead, it is important to be vigilant of situations in which you identify multiple indicators.

Indicators – may include:

- Patron entertaining a minor at the bar or restaurant that he did not come in with originally
- Individuals loitering and soliciting male or female customers
- Patron requesting information about or access to adult services or to local sex industry
- Individuals waiting at a table or bar and picked up by a male (trafficker or customer)
- Individuals asking staff or patrons for food or money
- Individuals taking cash or receipts left on tables
- Individuals exhibiting anxious or nervous behaviour and avoiding contact with staff and other patrons
- Individuals do not have identification, cell phones, or money of their own

What you can do

Report it

If you have any suspicions of modern slavery, sexual exploitation, human trafficking, forced labour or worker exploitation you should report it immediately.

You can contact:

The Police - 101, or in the case of an emergency
999

Crimestoppers – +44 (0)800 555 111

**UK Modern Slavery Helpline – +44(0) 800 012
1700**

**Modern Slavery and Human Trafficking Unit
- +44 (0) 844 778 2406**

**The Gangmasters and Labour Abuse Licensing
Authority (for forced labour and labour
exploitation) – +44 (0)800 4320 804**

Information checklist

The following checklist details the information that law enforcement agencies may find useful to record during an investigation. It will also assist partner organisations to provide the victim with appropriate care and assistance.

- Detailed descriptions of those involved
- Where the victims are working and/or living
- Other relevant locations
- Methods used to control or manipulate the victim
- The length of time this has been happening for
- Details of any transport used
- Travel routes/methods
- Financial information
- Documents used
- Method of recruitment
- National ties
- Relations with the exploiter



Procurement and Contract Management

- Procurement and contract management staff have a key role in helping to combat modern slavery both within the UK and in supply chains overseas:
- If you are contracting with organisations that provide temporary workers make sure that they are operating legally and with the correct registrations. You should include clauses in your contracts that give you the right to spot check payslips and talk to workers.
- For these types of contracts you should also carry out regular checks with your finance department, to spot any warning signs that workers are being controlled, for example of multiple workers being registered at the same address, or to the same bank account. Make sure your HR department is carrying out similar checks on staff recruited directly.
- Find out where your suppliers are sourcing their materials. Modern slavery, child labour and human rights abuses are major problems across the world especially in some sectors, such as food, clothing and technology. As part of the preparation before letting any big contract make sure you are familiar with the issues and relevant standards in the market you are dealing with.

- For global supply you can use the following useful index and list published by the Walk Free Foundation and the US Department of Labor.

www.globalslaveryindex.org

www.dol.gov/ilab/reports/child-labor/list-of-goods/

- The Welsh Government has published a Code of Practice on Ethical Employment in Supply Chains, which includes commitments designed to combat modern slavery. It is accompanied by a Guide to Tackling Modern Slavery. If your organisation has a turnover over £36m you will already be required to produce an annual statement on the steps you are taking to combat slavery. Signing up to the Code commits you to asking your suppliers to do so as well. The Welsh Government has also published a set of example questions and contract conditions that you can use during tendering and contract management to make sure that you are only working with suppliers that take these issues seriously.

See www.wales.gov.uk/code-of-practice

- Ensure that staff involved in letting and managing contracts, particularly those that involve temporary workers, receive appropriate training. Make sure that this training is built into the induction process for new staff. The Guide available on the link above has examples of training providers.

Further advice and guidance

Modern Slavery and Human Trafficking Unit

Telephone: **(0)844 778 2406** (24 hour advice and support)

www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre

UK Modern Slavery Helpline

Telephone: **+44 (0)8000 121 700**

The Salvation Army - UK charity providing support and advice

Telephone: **+44 (0)300 303 8151** (24 hour referral line)

www.salvationarmy.org.uk

NSPCC Child Trafficking Advice Centre

Telephone: **+44 (0)808 800 5000**

www.nspcc.org.uk/Inform/research/ctail/ctail_wda84866.html#how

Email: help@nspcc.org.uk

Gangmasters and Labour Abuse Licensing

Authority PO Box 10272, Nottingham, NG2 9PB

Telephone: **+44 (0)115 959 7052** (Intelligence team)

Email: intelligence@gla.gsi.gov.uk www.gla.gov.uk

For Further information please contact

Kim Ann Williamson: KimAnn.Williamson@cps.gov.uk

Notes

**IF YOU THINK SOMEONE MAY BE A VICTIM OF MODERN SLAVERY
CALL THE 24/7 MODERN SLAVERY HELPLINE ON**

08000 121 700

**WORKING TOWARDS
A WORLD WITHOUT SLAVERY**

