

## **Modern day Slavery**

### **Work planned or undertaken by Regulatory Services and Partnerships**

#### **Modern day Slavery links to Hand Car Washes in Southwark Project**

Following local intelligence from a member of the public provided to Southwark's Anti-Social Behaviour Unit (SASBU) the Metropolitan Police Service (MPS), along with investigating officers from the Gangmasters & Labour Abuse Authority (GLAA), executed a warrant at a commercial hand car wash premises in Southwark. A person was arrested on suspicion of human trafficking, money laundering and the illegal importation of tobacco products.

A total of 12 adult workers considered to be victims of trafficking for labour exploitation were found on the premises. On searching the arrested person's home the Police found 5 more adults and a 4yr old child.

6 of the adult victims agreed to assist with enquiries and were removed, along with the child, to a temporary reception centre. There they were supported, interviewed and assessed as potential victims of modern slavery and trafficking.

Following this incident Southwark Council's Regulatory Services decided to undertake a project to investigate if similar businesses, with potentially similar concerns, were operating in the borough. A Local Initiative Health & Safety Project was added to the Health & Safety Enforcement Team's work plan for 2018/19.

#### **Project aims**

- Identify all operational hand car washes in Southwark
- Map all identified operational hand car washes
- Provide health & safety advice to all hand car wash operators
- Ensure safe systems of work at all hand car washes
- Scout for potential modern slavery practices in all hand car washes

#### **Project objectives**

- Use colleagues across the service to identify the location of operational hand car washes in the borough
- Consult the external agencies who's remit could be affected by the project
- Provide officers involved in the project with the knowledge and skills required for the site assessments through training , discussion and reporting
- Engage with the business operators and workers on site, to see if they are receptive to health, safety and staff welfare messages
- Inform the business operators of their health, safety and staff welfare duties and provide guidance through the provision of a pack of information and signposting to industry specific information
- Assess workplaces to identify if there are any concerns of note relating to the health, safety and welfare of persons working on site
- Advise the business if there are significant health, safety or welfare concerns
- Scout for signs of modern slavery practices
- Report significant findings to the relevant agency, e.g. the Health & Safety Executive (HSE), the Gangmaster and Labour Abuse Authority (GLAA) and/or the Police

## **Summary of Results**

- Of 28 potential hand car wash locations identified in Southwark, 17 were confirmed as operational
- The co-operation of, and engagement with, local businesses was good at the vast majority (88%) of premises visited
- Compliance with health and safety law was good at the vast majority (88%) of premises, indicating that this business sector is not generally unaware of its legal obligations
- 12% of premises gave cause for concern with regard to health and safety law compliance and were referred to the Health & Safety Executive (HSE)
- The same 12% of premises also gave cause for concern for potential modern slavery and were referred to the Gangmaster & Labour Abuse Authority (GLAA)

## **Conclusions**

The project:-

- Identified 17 locations of operational hand car washes
- Checked and ruled out 11 potential businesses
- Engaged 20 businesses with key health & safety messages
- Informed 20 businesses where they can access further information
- Checked 20 premises for signs of modern slavery

The Team reported 2 hand car washes to the GLAA in relation to concerns of potential modern slavery. In addition the same two premises were reported to the HSE in relation to concerns of health & safety law non-compliance, in particular with regard to electrical safety.

3 Hand car washes were not referred as, following the on-site interventions there was considered to be insufficient justification. 1 hand car wash was not referred as the young workers were engaged in summer holiday work and were not working alongside any identified health and safety risk at the time of inspection.

## **Recommendations from the Project**

It was recommended that:

- The Head of Regulatory Services bring this project report to the attention of the lead member
- That a redacted version of this report is circulated to Southwark managers and team leaders, who may have an interest in the findings of this project
- That the Regulatory Services Safeguarding Co-ordinator be made aware of the two premises identified as being of concern
- That modern slavery awareness training is arranged for Southwark Council's front line staff, and managers and that it include information on the reporting mechanisms for safeguarding adults and children

## **Rogue Landlord Partnership Task Force**

The work of Regulatory Services has shown, particularly since the start of Southwark Council's Private sector Housing Licensing Scheme that rogue landlords are often involved in a number of criminal activities other than flouting Housing and associated Legislation. These activities include tax

evasion, trafficking and modern day slavery, abuse of immigration regulations and money laundering to mention a few.

To help tackle these crimes and in particular trafficking, slavery and immigration abuses Southwark has set up a Multi-Disciplinary Task Force focussed on the worst Landlords who operate in the Borough.

The partnership consists of colleagues from, Private Sector Housing Enforcement and licensing team, Trading Standards, Planning Enforcement, Revenues and Benefits, Temporary Accommodation, Tenancy Relations Service, SASBU, Legal Services, Local Land Property Gazetteer, The Home Office, Fire Brigade, Police, HMRC, Gangmasters and Labour abuse authority (GLAA) and the Immigration Service.

### **Aims & Objectives of the Task force**

- Ensure there are formal referral channels, and that they are working effectively
- Facilitate intelligence sharing between the teams to uncover potential illegal activity for investigation (such offences such as tax evasion, money laundering, trafficking, placing residents' health, safety and welfare at serious risk, modern day slavery)
- Highlight specific cases of concern
- Enable a coordinated response and robust enforcement against any rogue landlord or agent.
- Record multi-disciplinary successes, publicise through press releases and the GLA Watch-list
- Sharing best practice

### **Current Situation**

The Task force meets every other month. There are currently 25 landlords that are known to have committed housing, planning and trading standards offences who are being investigated in "forensic detail" by the partnership. This includes financial investigations, investigations into criminal contacts that link with the various illegal activities mentioned above.

To date over 3,000 housing licenses have been granted which means the landlords managing those properties are complying with the law, are providing safe accommodation and are very unlikely to be committing any of the offences the task force is interested in tackling.

In addition to the above there are a further 24 landlords who are facing legal offences for letting dwellings that place tenants at serious, health, safety and welfare risks.

### **Future Projects**

In 2018/19 Regulatory Services will undertake a similar project to that undertaken with car washes in respect of nail bars. It will employ a similar methodology, however it is likely more partners will be invited to join. There are 119 known nail bars in Southwark, however it is anticipated that there are many more.

Nail bars are known to be difficult premises to deal with as experience demonstrates that when the presence of an official is known, most "employees" pack and immediately leave. Such a reaction raises suspicion that some of these people may be trafficked and/or subject to some kind of servitude.

### **Other matters**

## **Training**

Regulatory Services are delivering a cascade model of in-house training to our front line staff. Designed by Barnardo's the package of training called 'Nightwatch' aims to empower our officers to be a network of eyes and ears alert to recognise signs of exploitation as they may relate to human trafficking and other forms of exploitation.

Initial training will be delivered to our staff who work in the Night Time Economy but will be broadened out to include other front line staff.

This package of training largely focuses on Child Sexual Exploitation but frames it in the context of other vulnerabilities including trafficking and /or other forms of criminal exploitation .