

London Modern Slavery Partnership Board **Thursday 25 July 2019**

Note and actions

Attendees:

- **Chair:** Mayor's Office for Policing and Crime (MOPAC)
- Gangmasters and Labour Abuse Authority (GLAA)
- Office of the Director of Labour Market Enforcement (DLME)
- FLEX
- LB Lewisham
- SIA
- Victim Support
- Home Office
- HESTIA
- Shiva Foundation
- Metropolitan Police Service (MPS)
- Lynette Paul, Metropolitan Police Service
- London Councils
- LAWRS
- ETI
- Office of the Independent Anti-Slavery Commissioner

Apologies:

- Human Trafficking Foundation
- Caritas Bakhita House
- London Borough of Redbridge
- Border Force
- Kalayaan
- ECPAT

Item 1 – Introduction and update on actions

MOPAC stated that the board would be continuing the workshop to draw out key challenges and solutions relating to hospitality. There will be a particular focus on convening and communicating.

MOPAC updated the group on the Domestic Servitude campaign, an agency has now been appointed. The agency will work with this group to design behavioural insights and a campaign. The aim will be to understand what works to feed into future work and the opportunity to bid for additional funding to scale up this project.

Item 2 – hospitality, Shiva Foundation

The Shiva Foundation outline the key risks and challenges related to modern slavery and human trafficking in the hospitality sector:

- Hospitality is a huge sector, 1 in 10 people work in this sector and there is a huge risk of labour exploitation.
- Raising awareness of modern slavery in the hospitality sector could inform others as to what is going on. Data is not strong on this as people have not been reporting issues, study in 2015 found that over 110,000 victims of modern slavery in European hospitality sector annually – this is an underestimate.
- Hotels are getting better at spotting sexual exploitation but not labour exploitation.
- Domestic servitude is an area of risk as hotels offer a private space.
- Supply chains are an issue – this needs to be ethical.
- Labour exploitation – this is a major risk area, low paid migrant workers.
- Structure of how hotels run needs to be analysed – huge percentage of labour in hotels is outsourced, franchise model – brand, hotel, manager – multiple links in supply chain – this is a risk. It is difficult to get all franchises to adopt the same policies.
- Shiva foundation are keen to raise awareness of modern slavery in the hospitality sector:
 - Corporate funded charity, working with anti-slavery commission, group of hotels.
 - Stop Slavery Blueprint – created with the hotel industry.
 - Piloted with Shiva hotel group.
 - Meet every month to meet indicators with Shiva Hotel group - progress in how they can spot indicators of modern slavery.
 - Research to uncover root causes of labour exploitation.
 - Working with GLAA to discuss how this will be moved forward.
 - Participating in steering group – how to work together in different areas of expertise – aim is to create a change in the system, working together collaboratively.

Current Picture

- Structure creates a black hole for activity, 90% industry are not doing enough on this area. More work needs to be done to reach out to individual hotel owners.

- Labour exploitation – No law enforcement to ask hotels to comply, hotel industry use 25% outsourced staff – black hole in recruitment agencies and audits are not required.
- 25% workforce are migrants, limited language skills, mostly from non-EU countries, they do not know legal status or rights and will not report human rights abuses.
- Hotel workers can be paid being paid below minimum wage on an hourly day rate.
- Rota systems can be a risk as workers at risk of being trafficked can be moved around to different locations to clean different premises, no one has control over those workers.
- Disconnection between housekeeping workers and HR. Worker are afraid of losing their job and report abuse. We need to find a way to empower these workers to come forward. Legal framework of enforcement is very tricky, for a worker to claim for unfair dismissal they have to work for two years.
- Lack of knowledge by the industry itself, engagement with outsourced providers is limited. Workers only have contact with supervisors, do not know who to contact.

A discussion on licensing as a solution to ensuring hotels are compliant with relevant codes of conduct:

- FLEX asked a question regarding if we license labour providers, requirement to have union for workers, where have conversations got to with this?
- The GLAA responded by outlining a pilot licensing approach involving car washes and nail bars. If this works, then model is transferrable.
- Shiva agrees that licencing does work, there are consequences, from a government view this is a burden, however this works for workers as this improves standards, businesses want licensing and there are different models.
- GLAA favoured option, collectively this is the right things to do. GLAA said they are lobbying for this.
- DLME awaiting to discussions regarding further licensing.
- ETI said that licensing model has worked in the past because it has been preventative. However, situation has now changed as it is much more reactive.
- If we are calling for licensing then it has to be properly resourced, protocol model is interesting, this is fairly new. Need to be aware that companies are happy to come together, need a much more robust approach, under pinned by prevention and enforcement.
- GLAA responded by saying if we get businesses to sign up, it allows us to focus on those businesses that do not comply and are hesitant to sign up, there can be peer pressure brought in from the industry.
- Shiva voiced concerns regarding voluntary and self-auditing.
- GLAA suggested there needs to be an element of enforcement.
- ETI outlined a consultation they are doing to bring labour enforcement together.
- ISAC said that licensing does work well in the past e.g. agriculture. There needs to be a model to target high risk sectors, voluntary audits, only where there are additional powers allows us to target resource.

Items 3 – Exercise: brainstorm, discuss and pitch a solution

The board split into two groups to each focus on labour exploitation and structure of the industry.

- Clarifying two or three questions trying to solve (largely connected to convene and communicate).
 - How do we access the brand – top of the supply chain.
 - Useful to map the structure, communication streams to tap into.
 - They aren't hidden – mechanisms in place of how to target.

Two groups will focus on the following topics:

- Labour exploitation – how might we better inform workers to step up.
- Structure – how do we engage with hotel owners, shame owners, marry up inform workers, come from different angles.

Group 1: Structure of the industry

Convene:

- How do we get hotel owners to step up?
- Develop and coordinate multi agency approach aimed at raising standards
- Trip advisor
- Publicise enforcement activity
- Publicise victims' stories
- Set protocols that companies agree too.
- Engage key international stakeholders to raise awareness
- Improve reporting mechanisms

Communicate:

- Engage Crown Hotels
- Public engagement – raising awareness of the issue.
- Inform owners on what brands are doing to tackle modern slavery and human trafficking.
- Use stakeholders that are already going into hotels (i.e. licensing, police)
- Ensure guests are aware of risks
- Information intelligence picture
- Positive message to those who do engage
- Why does it not damage hotels profits to be known for exploitation? What personal and professional responsibility is there?
- Map intelligence on all hotels, then use this information to engage with individual hotels
- How do we map the structure of supply chains?
- Use the reputation of the brand to create impact
- Bring Local Authorities on board. Can possibly enforce licensing conditions.
- Work with agencies who are already aware – influence the sector.

- Encourage brands to communicate with franchises.

Deliver:

- Local neighbourhood officers to go into hotels.
- 5 days of actions: range of partners to raise awareness during anti-slavery week.
- Host a UK Hospitality conference – training package takeaway.
- Distribute leaflets and information to workers giving them information about immigration worker rights, taking into account language barriers and illiteracy.
- Organised campaign – all partners have the same messages and get the public involved.

Group 2: Labour exploitation

Communicate:

- Provide rights info on entry to UK as part of immigration process
- Require labour providers to have recognised independent trade unions
- Make information about rights available to workers in own language and appropriate means
- Provide staff with accurate handbook informing them of their rights in their own language – specific with forms of exploitation
- Getting access to workers: regulators, unions, stakeholders
- Pay for translation services of existing useful documents
- What role do banks play? Could they give out leaflets/info when migrant workers open bank accounts?
- Implement systematic policies around legal aid, access to advice regarding immigration and employment tribunals.
- Create a policy framework regarding immigration tribunals and enforcement/policing.
- Information on what is the remit of statutory organisations
- Social media campaigns targeted at high risk communities in appropriate language on a platform they use.
- How might we better inform workers of their rights?
- How might we get individual hotels to take responsibility for their workers?
- Have community based, community lead information and networking centres, especially in high risk communities.

Convene:

- Accessible legal advice in workshops/drop in sessions
- Mayor, Local Authorities campaign with Unite union to sign up workers
- Assume that workers use public transport – comms campaign with TfL?
- Government needs to name and shame brands
- Research – businesses/human rights case regarding productivity where workers rights are respected.
- Data sharing changes needed with HMRCFRS in new Inspectorate

Deliver:

- Good Work Plan has introduced statement of work terms – add in statement of UK labour rights.
- Establish a helpline which provides both labour and immigration advice with a firewall between the Home Office.
- Brands only use recruitment agencies who provide workers with information and transparency on workers' rights.
- Government bodies (DLMEA/GLAA/ESI etc) to overtly communicate willingness to enforce their legal obligations under forced labour protocols.
- Trial tech tools for workers to communicate with one another regarding their safety.
- Get companies, buyers, franchises, labour providers to sign up to access remedy principles that enable workers to access their rights.

Item 4 – Any other business

- ETI have suggested to raise awareness of commitments to public procurements. If the Mayor and others are making public statements, then this message should be amplified. There is a need to join up regarding procurements and invite in all main suppliers on what modern slavery looks like. ETI also have a modern slavery evaluation tool, framework on things to include in modern slavery statements.
- LAWRS outlined the need to cover all forms of modern slavery – need to include exploitation rather than modern slavery.
- MOPAC said there is a need to pool resources and knowledge with new government.
- London Councils shared details of a summit they are organising on County Lines, this is due to take place in September. Primarily targeted to lead borough officers and Council CEOs. They have also commissioned research looking into attitudes to county lines, drugs and exploitation of young people. This is currently in development.
- London Councils to update on this at next meeting.