

Modern Slavery and Worker Exploitation.

The evolving risks.

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Not just what to do, but more
importantly, how to do it.

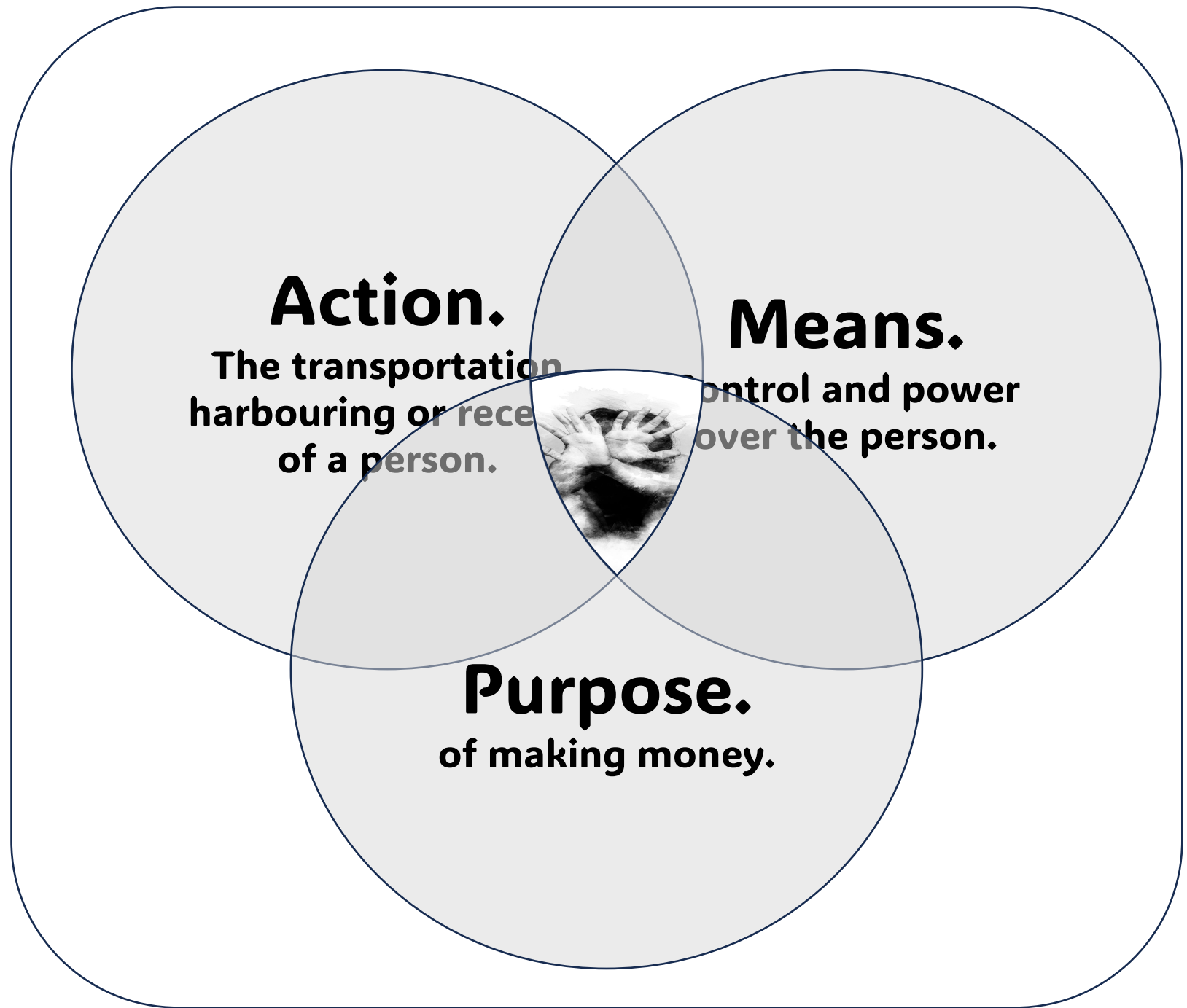


**East Midlands
Councils**

May Conference Short Video

- Help you find it.
- Engage with and best protect all stakeholders
- Understand the growing and evolving risks and threats.

Human Trafficking



Human Trafficking



HUMAN TRAFFICKING

Based on practical experience, success may rely on changing how you perceive Modern Slavery.

MYTH
BUSTING

MODERN SLAVERY MYTHS



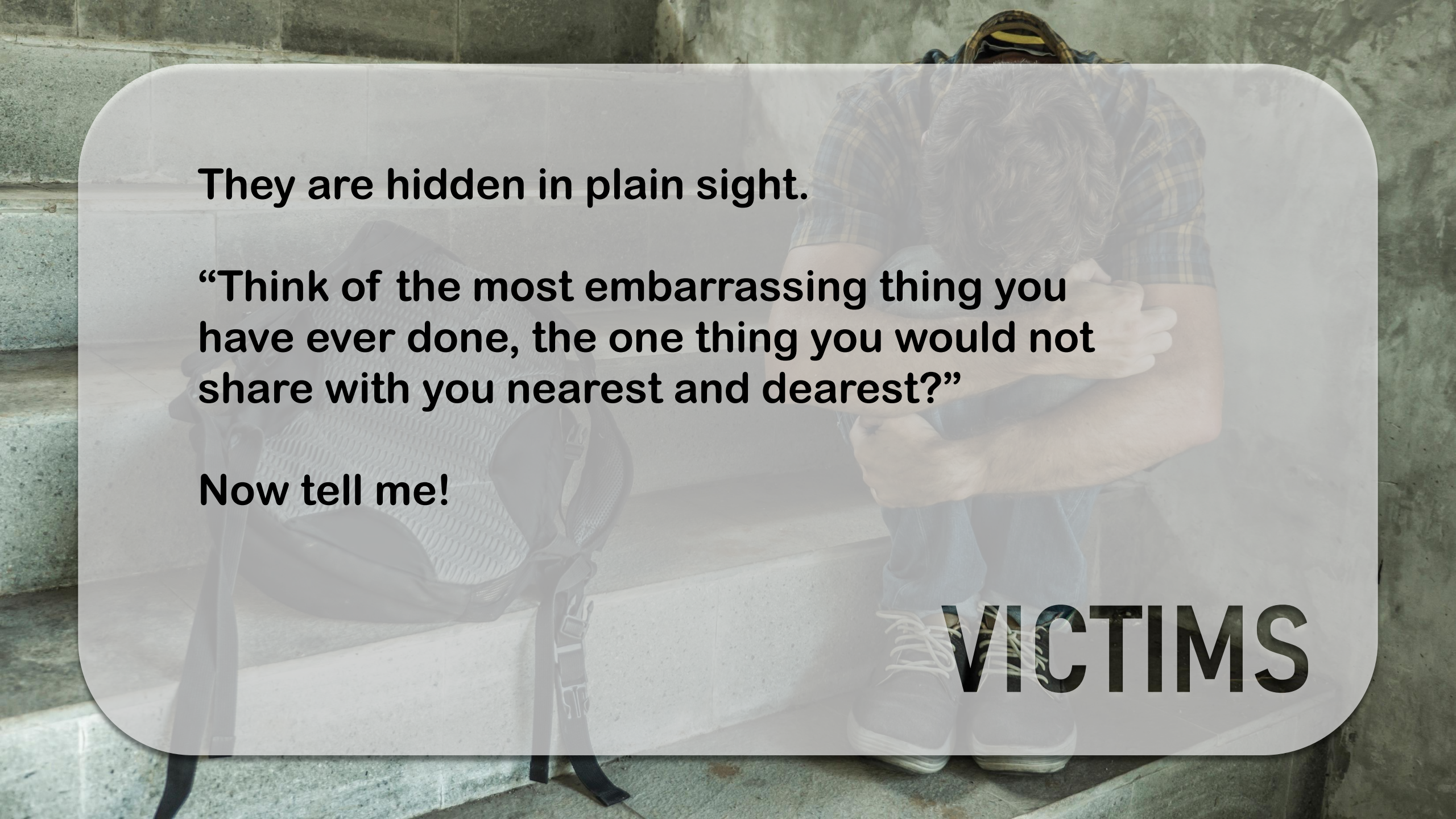
Let's look at the Action / Means / Purpose

This is a business

This is sophisticated, designed to compete, and can easily adapt or change. They are skilled in the identification of your process weaknesses.

**If you want to beat them, you must compete against them.
Treating them as criminals is ineffective.**

EXPLOITERS

A person with long, wavy brown hair is sitting on concrete steps. They are wearing a blue and yellow plaid shirt, blue jeans, and grey sneakers with white laces. Their head is buried in their arms, and they appear to be crying or in deep distress. A black backpack with a white mesh pocket is on the steps next to them. The background is a rough, grey concrete wall.

They are hidden in plain sight.

“Think of the most embarrassing thing you have ever done, the one thing you would not share with you nearest and dearest?”

Now tell me!

VICTIMS

Presence of abnormal – Typical Signs of Modern Slavery

These are important and should be looked for, but remember the exploiters know you are looking, and the victims will naturally hide the signs.

Absence of normal – Look for what is not there that should be?

These cannot be hidden!

SIGNS

Personal Experience



Based on > 23 years of real-life experiences.

Trigger Warning.



Personal Experience



19th June 2000.

> 80% of Agency workforce were illegal.

> 200 Victims.

Cases included sexual and financial exploitation.

I vowed it would never happen again....



Friday, 19 June, 2000, 08:25 GMT 09:25 UK
58 dead in port lorry



Bodies were found in a lorry at Dover Docks

The bodies of 58 people have been found in the back of a lorry at the English port of Dover.

The driver of the Dutch-registered lorry, which arrived from Zeebrugge, Belgium, just before midnight, has been arrested.

The 54 men and four women are thought to have been illegal immigrants and reports suggest they are of Chinese origin. Two survivors, both men, have been taken to hospital.

Home Secretary Jack Straw said he was appalled by the loss of human life caused by what he called "the evil trade in trafficking". He will make a statement to the House of Commons this afternoon.



The lorry had travelled to Dover from Zeebrugge

Amnesty International described the deaths as "a tragedy waiting to happen", and said it highlighted the desperate lengths some people were willing to go to enter the UK.

A Customs and Excise spokeswoman said the bodies were discovered by a single officer during a routine search of the lorry.

She said the officer was traumatised and had already undergone counselling to cope with the shock.

Personal Experience

2000 to 2005 – over 180 incidents of Migrant worker issues (Illegal or Exploited Workers)

19 Illegal workers were detained, and a forgery ring was broken through our work. As a direct result we received commendations from the courts.

Judge criticises illegal migrant workers

A JUDGE has criticised illegal migrant workers for taking jobs from local people as he jailed two Brazilians after they were caught with forged ID cards.

Paulo Sotini and Tiago Dos Reis were arrested while working at DGM Growers, of Pote Hole, after staff tipped off the Immigration Service because they were suspicious of the men's documents.

Lincoln Crown Court heard that both produced Portuguese ID cards to obtain their jobs but the documents were forgeries.

Investigations showed both men entered the UK as visitors but then illegally looked for work and stayed longer than allowed.

Recorder Sam Mainds told them: "The English public are getting increasingly anxious about people coming illegally into this country or coming legally and staying on illegally like you."

"By working here you are putting English people and people from the EEC out of work and that's not fair."

"On occasions you acquire the benefits of Social Security and the like."

Mr Sotini paid £200 and Mr Dos Reis £170 to a woman in Spalding who provided the forged documents which enabled them to legally work anywhere in the European Union.

Both had previously had forged Portuguese ID cards confiscated.

Jenny Carter-Manning, defending, said Mr Sotini was educated to university level and his ambition was to become an English teacher although he still needed an interpreter to make himself understood.

She said he was keen to return to his home country as his girlfriend is expecting a baby in the next few weeks.

Miss Carter-Manning said that the situation of Mr Dos Reis was in many ways similar to Mr Sotini but he had suffered depression while being remanded in custody, partly because of his lack of English.

In the case of Mr Dos Reis Mr Mainds said: "The employers in this case are to be commended for their good sense in bringing this matter to the attention of the authorities."

After the case a DGM Growers spokesman said: "DGM Growers Ltd has zero tolerance with regard to illegal working and thoroughly checks all forms of official paperwork."

"We are pleased with the support we receive from the Immigration Service and Lincolnshire Police and will continue to work with them to ensure we surpass current best practice."

Immigration officials raided a home in Saracen's Head on Thursday and arrested a Brazilian man working on forged documents.

The man, in his 30s, had been illegally working through an agency and is now awaiting removal from the country.

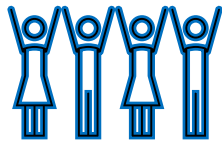
Personal Experience

2005

'THREAT'



Personal Experience



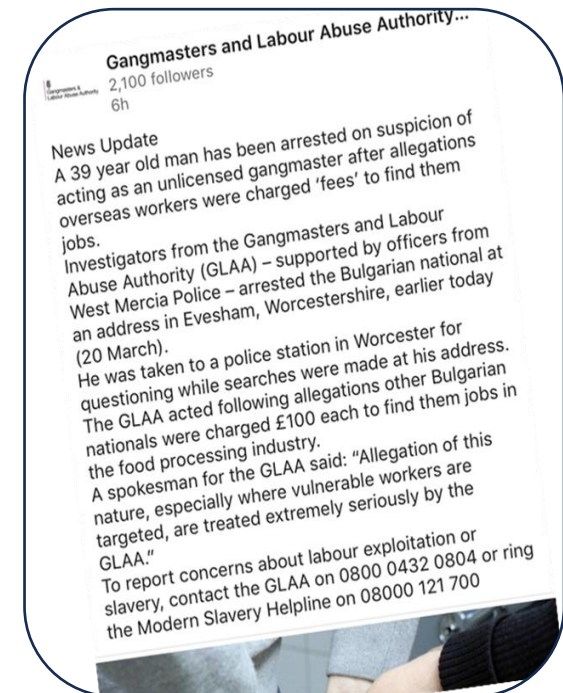
2019 - 45 Slaves in 3 addresses in Birmingham

2020 - Kenyan Supplier

2021 - >400 paying for work Ukraine – OCG

2022 - Nepal

2023 - Bognor Regis



Supplier Exposure

Ethics 101 – NEVER WALK AWAY



The Sunday Times February 14, 2021
NEWS

UK firm pays £4.6m to settle claims of 'rape and murder' at avocado farm

Deal follows Sunday Times inquiry into alleged abuse by guards at Kenyan estate supplying British supermarkets

Emily Dugan
Social Affairs Correspondent

The British owners of a Kenyan avocado farm that supplied British supermarkets have paid substantial compensation to 85 alleged victims of human rights abuses.

Kakuzi, a vast farm north of Nairobi, sold the fruit to supermarkets until last October, when a Sunday Times investigation revealed claims of abuses by its security guards. The allegations included that farm guards beat to death a 28-year-old man accused of stealing avocados, raped 10 women and committed dozens of other attacks on villagers.

Kakuzi's parent company, Camella, will spend up to £4.6 million on the settlement, including compensation, legal

costs and funding schemes for the community. Camella, whose headquarters are in Kenya, owns a majority share in the Kakuzi farm and is valued at £180 million.

The original claim, lodged in London's High Court by the law firm Leigh Day, was for 79 alleged victims of human rights abuses between 2009 and 2020. However, Camella was persuaded to expand the payout to include those who came forward after the initial lawsuit. One is understood to be a man named by guards, whose case we revealed.

When first approached about the allegations, Camella said they were a matter for the Kenyan farm to investigate. But after supermarkets including Tesco, Sainsbury's and Lidl stopped selling

Kakuzi's avocados, it opened talks with Leigh Day.

Further compensation has been paid to alleged victims who had been persuaded to accept smaller sums of about £1,000, sources in Kenya say.

Swaleah Githinji, who runs Ndulu Resource Centre, a human rights organisation based near the farm, said: "For the victims of human rights abuses this is a big win. We are eternally grateful for the role The Sunday Times played."

But he added: "The lack of a public apology shows that Camella and Kakuzi are not committed to the long-term resolution of these issues. There can be no new beginning without saying sorry."

Camella pointed to a statement made by Kakuzi last year where it said it was



'Rape, beatings and death' at farm that helps feed UK avocado habit

How we reported the controversy

apologising "to all the stakeholders about the current circumstances".

Daniel Leader, a partner at Leigh Day, said: "The settlement the parties have reached provides individual compensation for the claimants, who have claimed damages as victims of human rights abuses, but also guarantees a substantial package of additional measures which will help the numerous communities which surround the Kakuzi farm."

The settlement includes the guarantee that Kakuzi will build three new roads to help people access local services.

The farm has also set up a mechanism to allow future allegations of human rights abuses to be resolved fairly and quickly without needing to go to court.

Camella said: "The settlement is intended not only to resolve the claims themselves but also to help Kakuzi to strengthen its relations with the local communities."

The company argues that security is a challenge in Kenya and guards need to be armed. Following a recruitment drive, more than 40 per cent of Kakuzi's 350 guards are women.

Camella has also settled a parallel case brought by Leigh Day in Malawi. It has compensated 36 women who allegedly suffered sexual violence, including rape, while employed on tea plantations run by its indirect subsidiary, Eastern Produce Malawi. It will pay more than £2.5 million over three years in compensation, legal fees and on support projects.

Camella said: "The settlement is

Date: 25/04/2022 13:48

Kenya: Kakuzi avocado farmers earnings fall by 45%

Investor Exposure

Exposure can come from any stakeholder and be catastrophic to an organisation.



Ceased Trading.

Employee Exposure

Employee Exposure can be damaging for prolonged periods of time and become engrained into your business.

Britain's biggest trafficking gang used slaves to supply top supermarkets

As the gangsters are jailed, we reveal how their crimes impinged on all our lives



Members of the human trafficking gang, from top, left to right: Jan Sadowski, Julianna Chodakiewicz, Marek Chowaniec, Marek Sadowski, Justyna Parczewska, Natalia Zmuda, Ignacy Brzezinski and Wojciech Nowakowski



Employee Exposure

Criminal Exposure can happen at any point – successful organisations are able to apply appropriate due-diligence.

Seasonal workers from Nepal have been illegally charged fees to pick fruit and vegetables in the UK, an investigation has found.

Between January and October every year, Cobrey Farms, a large horticulture business in Herefordshire in the middle of the UK, offers jobs to hundreds of seasonal workers to pick asparagus, blueberries, beans, and rhubarb. It promises work that is "challenging, fun and rewarding," cheap on-site accommodation and a minimum of £10.10 per hour.

In 2021, farms like Cobrey were mostly hiring people from Ukraine, followed by much smaller numbers from Russia, Eastern Europe and Central Asia. 520 seasonal worker visas were also issued last year to Nepali nationals, and some went to Cobrey Farms.

This week, a joint investigation by *The Guardian* and the *Bureau of Investigative Journalism (TBIJ)*, a non-profit organization in the UK, revealed that many of them paid a very high price to get there.

One of the Nepali workers was Ditya, a single mother who, according to the investigation, paid £3,000 to recruitment agents to secure a job. Some of that money went to pay for her flight to the UK and for the visa, which cost about £250. "The rest appears to include illegal fees."

Ditya was not alone. The investigation discovered that other Nepali workers at Cobrey Farms had paid as much as £4,940 to agents, asking for a recruitment company in Nepal.

Indonesians wait for UK farm jobs after paying deposits of up to £2,500

Exclusive: Workers say they have been charged to guarantee a job - which may be illegal - and have not yet had an interview

27 March 2023
AG Recruitment & Management Ltd had their licence revoked due to failing to meet the sponsor duties as per the sponsor guidance which can be found at [Workers and Temporary Workers: guidance for sponsors part 3: sponsor duties and compliance - GOV.UK \(www.gov.uk\)](#).

Honoured to have accepted The Best Employer award on behalf of Pro-Force. This is also recognition of the amazing growers we work with across the UK.
[#legal](#) [#employment](#) [#farming](#) [#horticulture](#)



Ethical Importance

Modern slavery arrests in West Sussex

4th April 2023

Two men have been arrested on suspicion of exploiting Bulgarian farm workers in the south of England.



Overview of Live Modern Slavery Investigations in UK Policing July 2023

Published: August 2023



Data & Confidence:

This update provides a monthly overview of live police investigations being undertaken by police/ ROCUs across the UK, including PSNI and Police Scotland. Other than for the grand total of investigations marked with an *, which includes investigations by GMP and the MET, the Insight Team have been made aware of separately, only investigations recorded through the PND DDE process have been taken into consideration for the visuals in this report. This report is based on data correct as of the 8th August 2023. ***Please note that we have now removed those investigations from our reporting, which have not been updated since PND DDE 'go live in Nov 2020. For this reason, there has been an overall drop in investigations. ***

Police Operational Information Summary:

- Policing across the UK is currently dealing with at least 4840* live Modern Slavery Investigations and open crimes (3625 investigation reported via PND DDE, 1215 crimes and investigations reported by GMP and the MET separately). For PND DDE investigations, this is a decrease of 52 since last month.
- In spite of some divergence, there remains a strong correlation between suspect and potential victim nationalities,

Suspect Profile Police Investigations

The most frequently identified perpetrator nationalities are:

British
Romanian
Albanian
Chinese
Hungarian
Ghanaian
Pakistani
Polish
Slovak or Slovakian
Vietnamese/Bangladeshi
Iranian

Potential Victim Profile Police Investigations

The most frequently identified victim nationalities are:

British
Albanian
Romanian
Vietnamese
Chinese
Polish
Lithuanian
Portuguese
Ghanaian
Slovak/Slovakian/
Pakistani/Indian/Iraqi

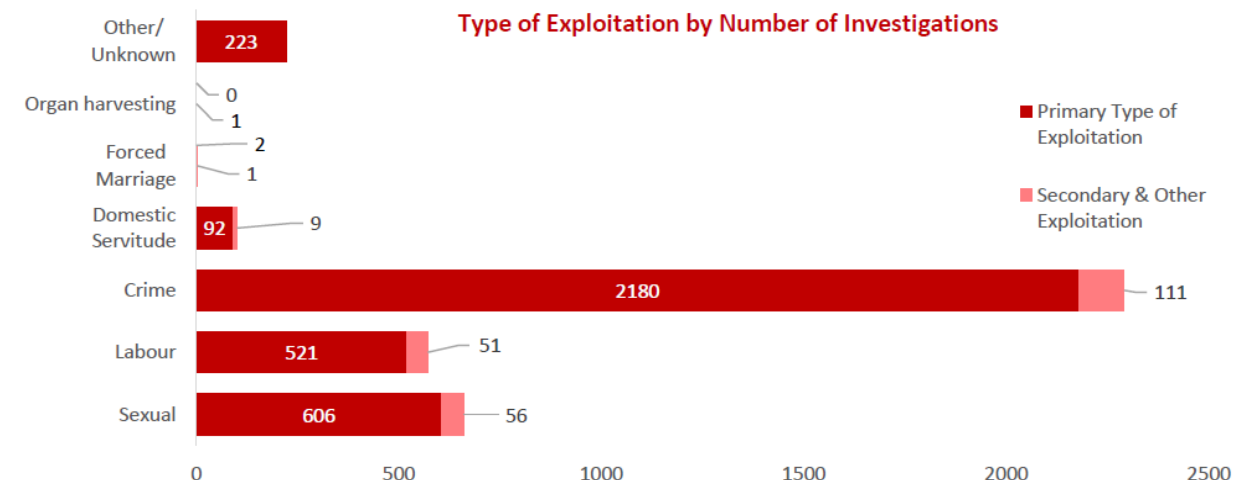
Sexual Exploitation: 606 (17%) investigations primarily tackle sexual exploitation. 662 investigations identify sexual exploitation at a primary level or otherwise.

Criminal Exploitation: 2180 (60%) investigations primarily tackle criminal exploitation (county lines/cannabis cultivation/fraud/theft). 2291 investigations identify criminal as an exploitation type, at a primary level or otherwise.

Labour Exploitation: 521 (14%) investigations primarily tackle labour exploitation within a range of sectors; the most frequently occurring are construction, car washes, the food industry (preparation, service manual labour, factories and health & beauty. 572 investigations identify labour exploitation at a primary level or otherwise.

Domestic Servitude: 92 (3%) investigations primarily tackle domestic servitude. 101 investigations identify exploitation through domestic servitude at a primary level or otherwise.

Forced/Sham Marriage: 3 (<1%) investigations involve tackling forced or sham marriages at a primary level or otherwise.

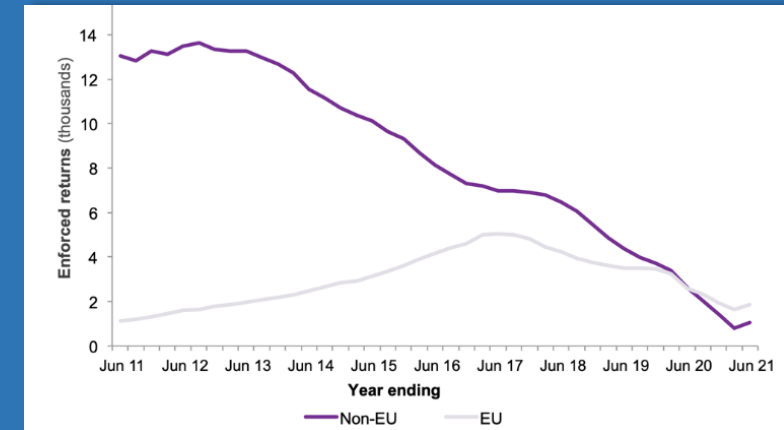
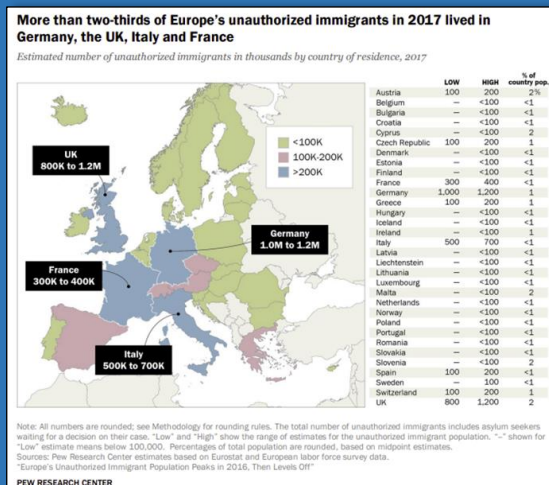
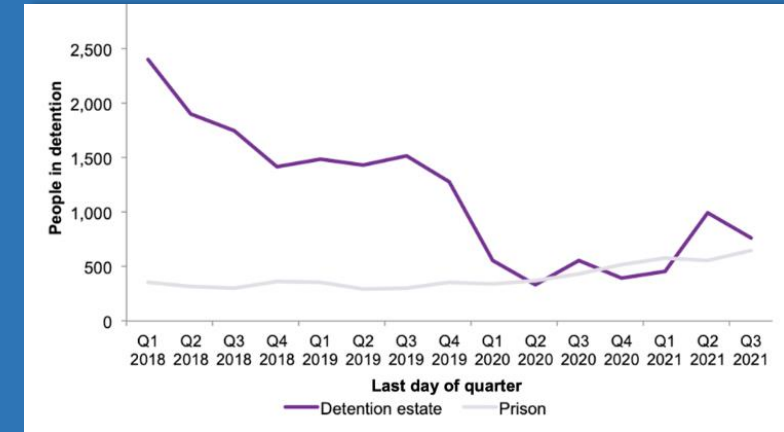
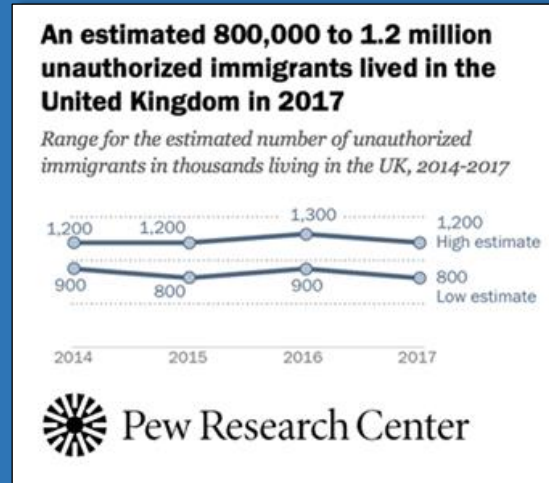


How Common is it?

Can you live in the UK without working?

How do you access Medical services?

How do they get into the workplaces?





2015 Immigration Review.

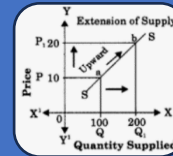
2016 Brexit



Labour shortages



Increases in boat crossings.



Instability in labour market.

EUSS / PSS / CoA

- Changes in the qualification period.
- Introduction of CoA
- Ending of CoA
- **Vulnerability**

SWS Tier 5

- Inexperienced supply
- Fee payments
- Desperation
- **Vulnerability**

Skilled Worker Tier 2

- Simply unregulated
- Over 65,000 sponsors
- SWS on a massive scale
- **Vulnerability**

UK Workers / ILR's

- Cost of living
- Benefits
- Desperation
- False ID / Illegal working / substitution
- £20k to £60k
- **Vulnerability**

fake proof of address



Images

Template

PDF

Online

Generator free

Is it illegal to

Utility bill

Maker

About 191,000,000 results (0.42 seconds)



replaceyourdocuments.com

<https://www.replaceyourdocuments.com> › proof-of-ad...

Novelty Proof of Address Documents

Our high quality **fake proof of address** letters, proof of residence in the UK and proof of address documents are perfect for unique birthday or graduation ...



Replace Your Docs

<https://www.replaceyourdoc.com> › proof-of-address

Fake Proof of Address Letters & Documents

Provide a **proof of address** without sacrificing the original with a quality replica **proof of address** letter such as utility bill, bank statement or tax ...



International Compliance Association

<https://www.int-comp.org> › insight › fake-documents-...

Fake documents: For all your 'novelty' proof of address needs

21 Mar 2017 — Over the years we have seen the emergence of websites offering creation of **fake** documents – you send the name and **address** you want shown on a ...



Online Novelty Docs

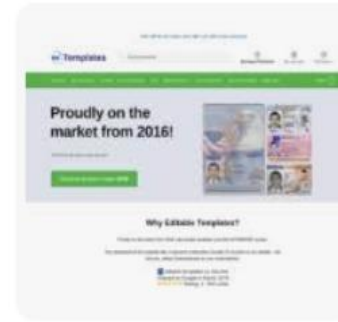
<https://onlinenoveltydoc.com> › proof-of-address

Proof of Address

Our company specializes in making **fake** replacement documents. If you want your **proof of address** documents to be made, we can aid you in providing all the ...



Replace Your Docs
Fake Utility Bills | Buy &...



Trustpilot
Editable Templates Reviews | ...



iStock
Utility Bill Template Stock Photo...



Fill io
Southern California Ed...



Pinterest
Fake Utility Bill Templ...



Scribd
British Gas Example B...



signNow
Xfinity Bill Template ...



Facebook
USA Nevada NV Ene...



Course Hero
Utility Bill Template....

They look real to me!

The Modern Slavery Act 2015 is government legislation brought into law to combat the growing crime of Slavery in the UK.

Section 54 requires that commercial companies produce a supply chain transparency statement annually, if their total turnover amounts to £36 million.





The
Supply
Chain is
Global.

EU: European Parliament's vote for new corporate due diligence legislation should strengthen human rights

Reacting to a vote in the European Parliament today in favour of a draft bill governing the responsibilities of corporations towards human rights and the environment, known as the Corporate Sustainability Due Diligence Directive, Hannah Storey, Amnesty International Policy Advisor on Business and Human Rights, said:

"The European Parliament has sent a clear signal that it intends to support access to justice for victims of corporate-related human rights abuses. The Corporate Sustainability Due Diligence Directive is a crucial piece of legislation that will help ensure larger companies are held to higher human rights and environmental standards. The European Parliament's support for this law is a welcome development.

“

The European Parliament has sent a clear signal that it intends to support access to justice for victims of corporate-related human rights abuses.

Hannah Storey, Amnesty International Policy Advisor on Business and Human Rights

	2023	2024	2025	2026
COMING INTO FORCE	<p>German Supply Chain Act in force for companies with over 3000 employees as of 1 January</p> <p>Norwegian Transparency Act companies will report on due diligence for the first time by 30 June</p> <p>EU Corporate sustainability reporting directive (CSRD) cross sectoral European sustainability reporting standards will be adopted as delegated acts in June</p>	<p>The German Supply Chain Act in force for companies with over 1000 employees</p> <p>Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act*</p>	<p>EU Corporate sustainability reporting directive (CSRD) companies already subject to the Non-financial Reporting Directive will report for the first time</p> <p>EU Corporate sustainability due diligence directive (CSDG)*</p> <p>EU Forced labour ban regulation*</p> <p>EU Deforestation-free products regulation*</p> <p>EU Directive empowering consumers in the green transition*</p> <p>Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act*</p>	<p>EU Corporate sustainability reporting directive (CSRD) large companies not already subject to the Non-financial Reporting Directive will report for the first time</p>
EXPECTED TO BE PASSED	<p>EU Corporate sustainability reporting directive (CSRD) sector specific European sustainability reporting standards specifying are expected to be published in 2023</p> <p>EU Forced labour ban regulation</p> <p>EU Deforestation-free products regulation</p> <p>EU Ecodesign for sustainable products regulation</p> <p>EU Corporate sustainability due diligence directive (CSDG)</p> <p>EU Directive empowering consumers in the green transition</p> <p>Canadian fighting against forced labour and child labour in supply chains act</p>	<p>EU Ecodesign for sustainable products regulation delegated acts are expected</p>		

Update on Canada's introduction of world-leading modern slavery act

Earlier this week, the Canadian House of Commons introduced leading legislation in the disruption of human trafficking. Bill S-211, *the Fighting Against Forced Labour and Child Labour in Supply Chains Act*, passed the Senate and will receive Royal Assent to become law.

The new legislation requires businesses and government institutions to report annually on the risk of forced labour and exploitative child labour in their supply chains.

Those reports will be made publicly available and non-compliant businesses could face fines of up to \$250,000 and potential criminal liability.

OTHER THREATS



Employee Claims

Health, Safety and WELFARE



Supply Issues

Insurance / Finance

- The victims are hidden in plain sight
- The exploiters are changing and adapting
- The signs are constantly hidden from us

- 1 Identify the hazards
- 2 Who can be harmed and how?
- 3 Assess the risk
- 4 Decide on what controls are needed. Reassess the risks
- 5 Record significant findings, communicate them and review assessment as necessary

We must proactively target - why?

- Limited resources
- It only affects people that are in some way vulnerable
- Only happens where money can be gained.

Think about processes.

Where are the hazards in a process and what is the risk of them happening?

- Collaborate



PROCESSES

PURSU

4P's

PR

- **75% of our activity should be spent on Prevention.**
- **If you are successful you will never know.**
- **Effective due –diligence is key and again should be focussed on processes.**



PREVENT

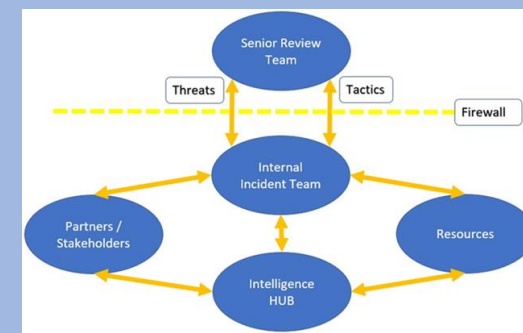
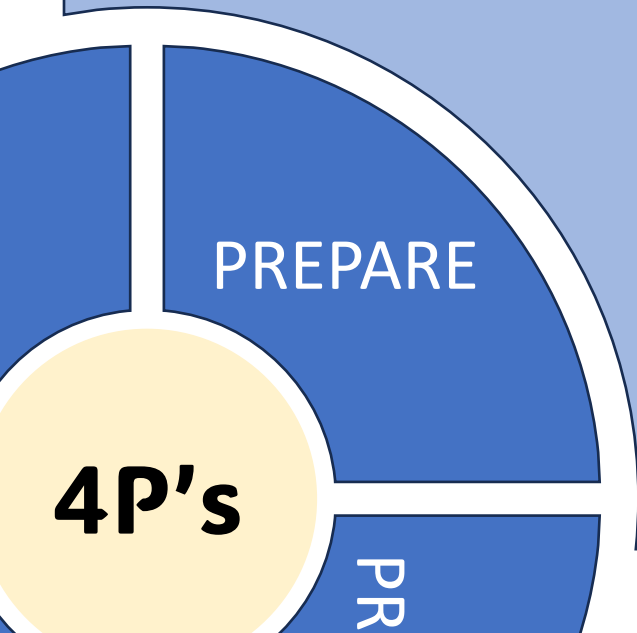
4P's

PR

- It is impossible to prevent everything so every organisation **MUST** prepare.

Development of a response plan.

- How to handle an Investigation and when to escalate and de-escalate
- Understanding boundaries and consequences of actions
- Effective structures aligned to existing resources
- External engagement



Stakeholder protection

- **Victims**
- **Business / organisation**
- **Customers**
- **Colleagues**
- **Suppliers**

Mapped stakeholders
Capacity and capability
Safeguarding
Scenario planning



PROTECT

4P's

P

Presence of
abnormal.

Most effective in my
experience is the
Absence of Normal.



Five Serian men.

Farmer was aware.

Supply was revoked.



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Not just what to do, but more
importantly, how to do it.

“You may choose to look the other way, but you can never say again that you did not know.”

— William Wilberforce

