

# IDENTIFYING AND RESPONDING TO ADULT EXPLOITATION

Guidance for practitioners working  
within Bedfordshire when responding  
to all forms of Adult Exploitation

BEDFORDSHIRE  
**AGAINST**  
VIOLENCE & EXPLOITATION

Bedfordshire

# Contents

<b>1. Introduction</b>	<b>3</b>
<b>2. Spot the Signs of Exploitation</b>	<b>5</b>
2.1 Modern Slavery	5
2.2 Cuckooing	6
2.3 Criminal Exploitation	7
2.4 Domestic Servitude	9
2.5 Forced Marriage	10
2.6 Human Trafficking	11
2.7 Labour Exploitation	13
2.8 Sexual Exploitation	15
<b>3. Working Together to Prevent Adult Exploitation</b>	<b>17</b>
3.1 Reporting Exploitation	17
3.2 National Referral Mechanism (NRM), forms and guidance	18
3.3 Intelligence Working with Bedfordshire Police	18
<b>4. Appendix</b>	<b>21</b>
<b>Useful Electronic Links - Legislation, Policy, Reference Sites</b>	<b>22</b>
4.1 Modern Slavery	22
4.2 Criminal Exploitation	23
4.3 Domestic Servitude	23
4.4 Forced Marriage	23
4.5 Human Trafficking	23
4.6 Labour Exploitation	24
4.7 Sexual Exploitation	24

# 1. Introduction

Exploitation is defined as the action or act of treating someone unfairly in order to benefit from them/their work<sup>1</sup>. Adult exploitation is taking place across the UK in both urban and rural areas, which includes Bedfordshire.

Adult exploitation has many different forms including modern slavery, which encompasses all of the different types of exploitation. This includes sexual exploitation, servitude, forced or compulsory labour, human trafficking and financial exploitation. However, it is important to note that whilst every victim of modern slavery is also a victim of exploitation, not every victim of exploitation will be a victim of modern slavery.

**Example:** Mr A, a 78 year old vulnerable adult, who finds his finances controlled by a family member without his consent or legal rights to do so, may present as a victim of financial exploitation whilst not being a victim of modern slavery. Whereas the trafficked labourer who sees very little of his earnings would be a victim of both exploitation and modern slavery.

The aim of this guidance tool is to provide a shared means of reference across Bedfordshire regarding adult exploitation as well as some guidance for spotting the signs of exploitation. This includes: 1) case studies of people's experiences of exploitation; 2) information regarding how to report exploitation; 3) links to legislation and 4) an appendix of organisations in Bedfordshire, which can support a person experiencing exploitation, including third sector.

It is hoped that this tool will enable practitioners to:

**Work together** with partners locally and across Bedfordshire, to protect vulnerable adults and prevent exploitation in an informed and unified way,

**Gather evidence** about victims, perpetrators or locations where adult exploitation is taking place across the county which will support police investigations and prosecutions, and

**Recognise** the various forms of adult exploitation and identify victims and vulnerable adults who may be at risk of exploitation.

This guidance should be read in conjunction with the same guidance for child exploitation, as well as the Bedfordshire Violence and Exploitation Reduction Strategic Response.

**Note:** This guide **must** be used in conjunction with your local Safeguarding Guidance and not as a standalone document. The indicators provided are not exhaustive and as such, professional curiosity and observation as standard practice cannot be emphasised enough.

## Victims of Exploitation

Trying to identify a potential victim of exploitation is challenging, as **victims are normally reluctant to open up during initial discussions or assessments**. Reasons for this may include distrust of authority e.g. they may fear deportation to a country where they might be at risk of harm, fear for their personal safety or the safety of a loved one. This can unfortunately lead to **false and negative impressions of the victim**. Their ability to participate in any future proceedings, for example as a witness, will depend largely on

<sup>1</sup> Oxford dictionaries



their psychological, emotional and physical health<sup>2</sup>. With this in mind, it is important that practitioners are familiar with the indicators common across all types of exploitation, which will help with identifying possible victims and may help to bring perpetrators to justice.

**Note:** Victims of exploitation are often hidden and therefore not known to adult or child services. Referrals for adult safeguarding will only meet the safeguarding criteria when they have care and support needs such as a disability, which many people in situations of exploitation do not have. In these cases please contact the Modern Slavery Helpline on 08000 121 700 or 999.

## 2. Spot the Signs of Exploitation

Many of the main types of exploitation have specific signs unique to them, However, there are seven signs which are common across all forms of exploitation. If you see any of these signs (see page 6 which can be printed and used separately as a poster), you should either refer to the relevant organisation or **if you believe a person is in immediate risk of harm contact the police on 999 or Modern Slavery Helpline on 08000 121 700.**

### 2.1 Modern Slavery



#### Definition/ Description

The following definitions are encompassed within the term 'modern slavery' for the purposes of the Modern Slavery Act 2015. These are:

**'slavery'** is where ownership is exercised over a person

**'servitude'** involves the obligation to provide services imposed by coercion

**'forced or compulsory labour'** involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily

**'human trafficking'** concerns arranging or facilitating the travel of another with a view to exploiting them.

The police, local authorities, the National Crime Agency and the Gangmasters and Labour Abuse Authority have a **duty to notify**<sup>3</sup> the Home Office under the Modern Slavery Act 2015.

Duty to notify forms should be completed to notify the Home Office if you have encountered a potential victim of modern slavery but they do not want to be referred into the NRM (to receive support and a decision about their case). This **online form** allows the potential victim to remain anonymous (unless they consent to being identified).

For further information please refer to the Modern Slavery Act 2015<sup>4</sup>.

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/655504/6.3920\\_HO\\_Modern\\_Slavery\\_Awareness\\_Booklet\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655504/6.3920_HO_Modern_Slavery_Awareness_Booklet_web.pdf), Page 7

<sup>3</sup> [Duty to notify the Home Office of potential victims of modern slavery - GOV.UK](#)

<sup>4</sup> [www.unseenuk.org](http://www.unseenuk.org)



Spot the  
signs

## Indicators from the National Referral Mechanism (NRM)

(Please tick all relevant boxes).

- Distrustful of authorities
- Expression of fear or anxiety
- Signs of psychological trauma (including post traumatic stress disorder)
- The person acts as if instructed by another
- Injuries apparently a result of assault or controlling measures
- Evidence of control over movement, either as an individual or as a group
- Restriction of movement and confinement to the workplace or to a limited area
- Passport or documents held by someone else
- Lack of access to medical care
- Isolation - limited social contact or contact with family
- Signs of ritual abuse and witchcraft (juju)
- Substance misuse
- Person forced, intimidated or coerced into providing services
- Doesn't know home or work address
- Perception of being bonded by debt
- Money is deducted from salary for food or accommodation
- Threat of being handed over to authorities
- Threats against the individual or their family members
- Being placed in a dependency situation
- No or limited access to bathroom or hygiene facilities



Case Study

### Nicholai's story:\*

Life in the Ukraine was hard. It was very difficult to find work and when I did, it was long hours, for hardly any money. I could not earn enough to cover even basic things like food and rent. Each day, the other men and I would queue up to be assigned a job but there was never enough work for everyone. One day, a man approached a group of us and told us about an opportunity in the UK, washing cars with a promise of good pay, accommodation provided and all travel costs paid.

The accommodation I was promised turned out to be a small caravan at the back of the carwash, shared with five other men. I was told that there was no space for my backpack and belongings and these were taken away from me immediately. I arrived in the winter and was forced to work from dawn to after sundown each day in freezing conditions.

I was told that I had to work off the cost of my travel to the UK and they also deducted money for staying in the caravan; no-one would even tell me how long it would take to pay off this debt. I was really intimidated by the bosses. They would drink heavily and would often beat us if we did not work as quickly as they wanted. Several times, I decided to leave and find a way back home but was told that my family would be hurt if I left before working off my debt. I felt frightened, trapped and completely hopeless.

After three years, the car wash was visited by the police and support workers from Unseen. They asked me lots of questions and offered me some help. At first, I was terrified of what my bosses would do to me if I told the police what was happening, but I realised this was my only way out. Unseen helped me access medical care and gave me a room at a safe-house, where the bosses could not find me.<sup>5</sup>

\* This is a composite case study, reflecting experiences commonly reported by survivors to Unseen. Pseudonyms have been used to protect the identity of individuals.

<sup>5</sup> [www.unseenuk.org](http://www.unseenuk.org)

# SPOT THE SIGNS OF ADULT EXPLOITATION

**Vulnerable adults in Bedfordshire are at risk of exploitation by criminal gangs. This could include:**



## **Physical Appearance**

May appear withdrawn, show signs of abuse or have unexplained or suspicious injuries.



## **Isolation**

Victim may appear to be under the influence of others or seem unfamiliar with their surroundings.



## **Poor Living Conditions**

Could be dirty and cramped or the victim may live at the same place that they work.



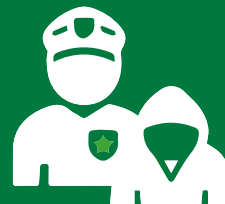
## **Restricted Movement**

Victim may not have their own travel documents or be let out on their own.



## **Possessions**

Victim may have no ID, only a few possessions and may always wear the same clothes.



## **Won't Seek Help**

Could be with someone else or appear hostile to police and other agencies.



## **Unusual Travel Times**

May regularly be dropped off/collected for work very early or late at night.

## 2.2 Cuckooing



### Definition/ Description

Cuckooing is currently the dominant method of obtaining access to suitable premises for criminal activity. The vulnerable adults targeted are predominantly Class A drug addicts but also include the elderly, those with mental or physical health impairments, female sex workers and single mothers.

County lines groups and local gangs will target new premises by pursuing vulnerable individuals who attend recovery groups, dependency units and areas associated with those experiencing problems. They are seeking to establish relationships with vulnerable individuals for access to their homes. Once they gain control over the victim, whether through drug dependency, debt or as part of their relationship, groups move in. Once this happens the risk of domestic abuse, sexual exploitation and violence increases. In some instances, drug users may appear to be complicit in allowing their home to be used, however the issue of true consent is questionable, as many drugs users will not necessarily see themselves as being vulnerable.

It is common for county lines networks to have access to several cuckooed addresses at any one time. They will move quickly between vulnerable peoples' homes and will stay for just a few hours, a couple of days or sometimes longer. This helps groups evade detection, especially as intelligence gathered by law enforcement is often unclear and is quickly out of date.<sup>6</sup>



### Spot the signs

### Signs that 'cuckooing' may be going on at a property include:

(Please tick all relevant boxes).

- An increase in people entering and leaving
- An increase in cars or bikes outside
- Possible increase in anti-social behaviour
- Increasing litter outside
- Signs of drugs use
- Lack of healthcare visitors



### Case Study

A vulnerable Luton male in his early 50s made a disclosure that his property had been taken over and that he was subject to physical abuse from these individuals.

Due to fear of reprisal this male was reluctant to make a formal complaint to the authorities, but was allocated a Police Community Support Officer, who visited him on a regular basis to carry out welfare checks and disrupt the activity that was being alleged.

Through partnership working, enough evidence was obtained to secure a partial closure on the premises. This is a court order, meaning that only the tenant and stipulated people/organisations are permitted to attend the address.

In addition to this, one of the individuals involved in the exploitation and cuckooing of this male was later issued with a Criminal Behaviour Order. This order prohibits the individual from being in the possession of anyone's bank card other than a card issued to himself, and from sleeping at any location other than his own home address without prior authorisation from the police or Priority Anti-Social Behaviour Team.

<sup>6</sup> NCA County Lines Violence, Exploitation & Drug Supply 2017, National Briefing Report

## 2.3 Criminal Exploitation



### Definition/ Description

There is currently no legal definition of criminal exploitation and also very little guidance. Criminal exploitation involves the exploitation of a vulnerable person who is forced or coerced into begging or committing a crime or crimes which is for the financial gain of the abuser.

Criminal exploitation can take many forms, including: the drug trade, e.g. cannabis cultivation and drug distribution, begging, pick-pocketing, shoplifting, bag snatching, ATM theft, selling of counterfeit goods, benefit fraud<sup>7</sup> and using personal accounts for money laundering.

**County Lines**<sup>8</sup> is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. It involves child criminal exploitation (CCE) and the exploitation of vulnerable adults as gangs use children and vulnerable people to move drugs and money.

This may involve gangs establishing a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’. Bedfordshire has issues with county lines coming into the county from other areas, as well as gangs from Bedfordshire exporting county lines into other areas.



### Spot the signs

### People who are being criminally exploited may:<sup>9</sup>

(Please tick all relevant boxes).

Be children, elderly persons or disabled migrants (vulnerable adults), begging in public places and on public transport

Be children carrying and/or selling illicit drugs

Have physical impairments that appear to be the result of mutilation

Be children of the same nationality or ethnicity who move in large groups with only a few adults

Be unaccompanied minors who have been ‘found’ by an adult of the same nationality or ethnicity

Move in groups while travelling on public transport: for example, they may walk up and down the length of trains

Participate in the activities of organised criminal gangs

Be part of large groups of children who have the same adult guardian

Be punished if they do not collect or steal enough

Live with members of their gang

Travel with members of their gang to the country of destination

Live, as gang members, with adults who are not their parents

Move daily in large groups and over considerable distances. The following might also indicate that people have been trafficked for begging or for committing petty crimes

New forms of gang-related crime may appear

There is evidence that the group of suspected victims has moved, over a period of time, through a number of countries

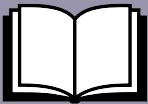
There is evidence that suspected victims have been involved in begging or in committing petty crimes in another country

<sup>7</sup> [www.stopthetraffic.org](http://www.stopthetraffic.org)

<sup>8</sup> <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>

<sup>9</sup> [http://www.unodc.org/pdf/HT\\_indicators\\_E\\_LOWRES.pdf](http://www.unodc.org/pdf/HT_indicators_E_LOWRES.pdf)





### Case Study

MU was a Hertfordshire investigation relating to cuckooing, with implications across Bedfordshire. MU, a young Hertfordshire care leaver, was stabbed and killed following an argument with two young men who had been using his flat in Luton as a base for drug dealing.

Despite the eventual outcome there was evidence of good practice in the services provided to MU. His Personal Advisor worked very hard to develop an **effective working relationship** with him and probably achieved the most significant professional contact with him. This was in part because she worked with MU in a very practical way providing assertive outreach to him.

It seems that MU's engagement with services was greater where the services were able to provide a more flexible approach and make contact with him in a personal and customised fashion. **His engagement seemed least effective when invited to attend meetings by appointment.**

Other examples of good practice included significant efforts by health staff in HMP Bedford to obtain health information for their assessment of MU and a speedy response to provide accommodation by the housing department once MU was deemed homeless.

The key issues identified in this case related to cross border/multi agency working and information sharing.

## 2.4 Domestic Servitude



### Definition/Description

Domestic servitude is a form of Modern Slavery. The victim will be: forced to work through coercion, or mental or physical threat; owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse; dehumanised, treated as a commodity or bought and sold as 'property'; physically constrained or have restrictions placed on their freedom of movement.<sup>10</sup>

Victims of domestic servitude may appear to be nannies or other domestic help, but the moment their employment arrangement transitions into a situation whereby they cannot leave on their own free will, it becomes a case of enslavement.

Victims of domestic servitude commonly work 10 to 16 hours a day for little to no pay.



### Spot the signs

### Indicators extracted from the National Referral Mechanism (NRM)

(Please tick all relevant boxes).

Living with and working for a family in a private home or place of accommodation

Not eating with the rest of the family or being given only leftovers, or inadequate food

No private sleeping place or sleeping in shared space, for example the living room

No private space

Forced to work in excess of normal working hours or being 'on-call' 24 hours per day

Employer reports them as a missing person

Employer accuses person of theft or other crime related to the escape

Never leaving the house without permission from the employer

<sup>10</sup> <https://www.antislavery.org/slavery-today/modern-slavery/>



### Case Study

**In 2016:** A man who treated his wife as a slave and subjected her to an existence of 'violence, intimidation, aggression and misery' became the first Briton convicted of forcing their spouse into domestic servitude. The victim who came to the UK for an arranged marriage into which she entered willingly said in court "I cooked, I cleaned, I washed, I ironed, looked after other people's children and when things were not to the liking of the family I was punished by beatings. I felt that there was only one purpose of my life and that was to serve this family".

**Manisha's Story:** I am from Africa. I am now 19. When I was younger my father used to drink all the time and I never knew my mother as she left me when I was a baby. I was sent to live with my aunt in the UK who had promised to get me into a school and look after me.

My aunt paid for me to come to the UK, but didn't do anything about getting me into a school. Instead I spent my days cooking, cleaning and looking after my auntie's own two children. I worked non-stop from 6am to 1am each day. I was beaten most days. Once I was hit so hard in the head I had to have stitches. Then one day my aunt tried to drown me in the bath, but I screamed so loud the neighbours heard my cries and called the police. I was taken away from my aunt. I cannot go back home to Africa. I am too scared. My aunt knows lots of people who would hurt me.

## 2.5 Forced Marriage



### Definition/ Description

There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the prospective spouses. However, in forced marriage, one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In the cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

The provision of consent is essential within all marriages – only the spouses themselves will know if their consent is provided freely. Forcing someone to marry can result in a sentence of up to seven years in prison and should not be confused with an arranged marriage which is entered into with the agreement of both parties.

Disobeying a Forced Marriage Protection Order can result in a sentence of up to five years in prison.

Victims of forced marriage are often children and teenage/young adults.

When speaking to the victim, it is important to reassure them that whatever they tell you will be confidential. This is especially important for young people, who may be worried that you will tell their parents what they have said.



### Spot the signs

## As victims may not disclose forced marriage at first, professionals need to be able to spot the signs that a victim may be at risk:<sup>11</sup> (Please tick all relevant boxes).

Young victims under pressure from their families may present to school, college, or sixth form nurses and counsellors;

- with depression and self-harming behaviour such as anorexia
- cutting
- substance misuse or attempted suicide
- They may ask for vaccinations for an upcoming 'family holiday' or about contraception

Victims who have already been forced into marriage may have injuries consistent with rape or domestic violence and may ask about termination of a pregnancy

To establish whether forced marriage is a factor, school nurses, family workers and education counsellors can ask open questions to help identify risk factors eg:

- How are things at home?
- Do you get on well with your parents?
- Apart from school, do you go out much?

Young people at risk are often strictly monitored by parents and or family

They may not be able to attend after-school activities or be allowed to talk to the opposite sex

They may be monitored by siblings

They may not be allowed to consider going to university or getting a job after leaving school or college

They may be about to travel on a planned 'family holiday' or moving overseas which may be a cover story for a forced marriage. If these factors are present, the young person may be at risk of forced marriage



### Case Study

**Camille's story:**<sup>12</sup> I was 16 when my dad took me to Afghanistan. He told me it was to visit my grandfather who was sick but when we got there it was all about marriage. I was told straight away that I was to wed my cousin, Samir, in two weeks' time. He was my uncle's eldest son and seven years older than me. I felt sick. I told my dad I was too young, I wanted to go home, back to school and my friends but he said it had been decided years ago, there was no negotiating.

Camille called her friend to say what was happening and she told her teacher. The teacher called the Forced Marriage Unit. They arranged for an order to be served on her mum in England to ensure her safe return to the UK. Camille lived with her parents with the order in place. She is now a graphic designer and is living independently.

**Malcolm's Story:**<sup>13</sup> I'm Susan, Malcolm is my dad. He is 75 and over the last five years has become very ill with Alzheimer's disease and his dementia is very bad. He cannot remember even the most basic of things like where he lives and how to make breakfast. Last summer I was told by his neighbour Pamela that she had booked a holiday for them and they are in love and will get married when they get back. I couldn't believe it.

When I asked dad about the situation he couldn't remember saying yes to a trip but thought a holiday might be nice. When I mentioned marriage, he couldn't recall what that word meant. Susan wasn't sure this would be classed as a forced marriage so she called the FMU to ask. They explained that because it would appear that Malcolm does not have mental capacity to consent to marriage, there is no need for evidence of coercion or pressure as it is a criminal offence if a person lacks mental capacity. A capacity assessment was carried out. He didn't have capacity and the decision was made for the police to take action.

<sup>11</sup> <http://www.sec-ed.co.uk/best-practice/spotting-the-signs-of-forced-marriage/>

<sup>12</sup> <https://www.gov.uk/stop-forced-marriage>

<sup>13</sup> ibid

## 2.6 Human Trafficking



### Definition/ Description

Is defined by the **United Nations Office on Drugs and Crime:**

“Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs”.

United Nations High Commissioner for Refugees, 2006, defines human trafficking as having three connected factors:

1. Movement (including within the UK);
2. Control, through harm/threat of harm or fraud;
3. For the purpose of exploitation.

Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude, and inhumane treatment.

See also 'Modern Slavery', overleaf for further information.



### Spot the signs

**People who have been trafficked may:**<sup>14</sup> (Please tick all relevant boxes).

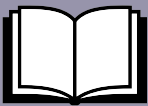
- Believe that they must work against their will
- Be unable to leave their work environment
- Show signs that their movements are being controlled
- Feel that they cannot leave
- Show fear or anxiety
- Be subjected to violence or threats of violence against themselves or against their family members and loved ones
- Suffer injuries that appear to be the result of an assault
- Suffer injuries or impairments typical of certain jobs or control measures
- Suffer injuries that appear to be the result of the application of control measures
- Be distrustful of the authorities
- Be threatened with being handed over to the authorities
- Be afraid of revealing their immigration status
- Not be in possession of their passports or other travel or identity documents, as those documents are being held by someone else
- Have false identity or travel documents
- Be found in or connected to a type of location likely to be used for exploiting people
- Be unfamiliar with the local language
- Not know their home or work address
- Allow others to speak for them when addressed directly
- Act as if they were instructed by someone else
- Be forced to work under certain conditions
- Be disciplined through punishment
- Be unable to negotiate working conditions

<sup>14</sup> [https://www.unodc.org/documents/human-trafficking/HT\\_indicators\\_E\\_LOWRES.pdf](https://www.unodc.org/documents/human-trafficking/HT_indicators_E_LOWRES.pdf)



continued

Receive little or no payment  
Have no access to their earnings  
Work excessively long hours over long periods  
Not have any days off  
Live in poor or substandard accommodations  
Have no access to medical care  
Have limited or no social interaction  
Have limited contact with their families or with people outside of their immediate environment  
Be unable to communicate freely with others  
Be under the perception that they are bonded by debt  
Be in a situation of dependence  
Come from a place known to be a source of human trafficking Have had the fees for their transport to the country of destination paid for by facilitators, whom they must payback by working or providing services in the destination  
Have acted on the basis of false promises



Case Study

**Dorina's Story:** I'm 24 years old and from Romania. My mother left when I was a child and my father was an alcoholic and couldn't get any work. I left school when I was 10 and earned money through lots of different jobs in the city. I did agricultural work in the summer months.

Then, I met a man who promised me a job and a house and a better life in the UK. He paid for my coach ticket to the UK, but when I arrived things were different. I was forced to have sex with lots of different men and often beaten. I was taken to lots of different places.

After two months I managed to escape and stop a police officer in the street. He brought me to Unseen.

On arriving at Unseen, Dorina received support with accessing physical health services where she was diagnosed with and treated for numerous sexually transmitted diseases. She then chose to begin a 10-week counselling programme.<sup>15</sup>

**Story of Maya, British girl trafficked into sexual exploitation:** Maya\* grew up in a foster family in a typical British town. She was coerced and forced into sexual exploitation when she was 12 years old. She was trafficked all around the region and exploited, even when she went on school trips. Her ordeal went undetected for seven years.

"I should never have been trafficked for that many years undetected", Maya said. "I was not only a child, but I was a child in a school, a child with a GP, a child with foster parents and social workers, all which failed throughout seven years to identify that I was being tricked, controlled, tortured and sold every day.

"Through this crime everything was taken from me, my control, my dignity, my future, my voice. It was impossible for me to speak out and nobody around me took any notice of the signs right in front of them."

Maya was rescued five years ago when she got in contact with police, and an officer reacted to signs she was displaying and identified her as a potential victim of trafficking.

**"All it took was one individual** police officer not to dismiss the signs and to look further than what you see on the surface."

<sup>15</sup> Unseen UK Stories: <https://www.unseenuk.org/our-impact/unseen-stories>

## 2.7 Labour Exploitation



### Definition/ Description

Labour Exploitation/Forced or compulsory labour is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. (International Labour Organization Forced Labour Convention, 1930 (No. 29)).<sup>16</sup>

Forced labour takes many forms, including debt bondage, trafficking and other forms of modern slavery. The victims are usually the most vulnerable members of society - women and girls forced into sex work, migrants trapped in debt bondage, indigenous people with limited rights, sweatshop or farm workers restrained by illegal tactics and paid little or nothing. Many people are trafficked into or within the UK to carry out hard manual work on farms or in factories. Their passports may be confiscated (if they have been trafficked). They are made to live in poor conditions.<sup>17</sup>

This is not a phenomenon just affecting overseas workers: in early 2012, several British men were rescued from a site in Bedfordshire where they had been living in squalid conditions, forced to work day and night without pay. Other places where you may find people being exploited for their labour are construction sites, nail bars, restaurants and car washes. Employment agencies, labour providers or gangmasters who provide workers to the agriculture, horticulture, shellfish gathering and any associated processing and packaging sectors listed below, must have a GLAA licence. It is a criminal offence to supply workers without a licence or use an unlicensed labour provider.



### Spot the signs

#### Indicators extracted from the National Referral Mechanism (NRM):

(Please tick all relevant boxes).

- No or limited access to earnings or labour contract
- Excessive wage reductions, withholding wages, or financial penalties
- Dependence on employer for a number of services, for example work, transport and accommodation
- Any evidence workers are required to pay for tools, food or accommodation via deductions from their pay
- Imposed place of accommodation
- Found in poor living conditions
- Evidence of excessive working days or hours
- Deceived about the nature of the job, location, or employer
- Employer or manager unable to produce documents required when employing migrant labour
- Employer or manager unable to provide record of wages paid to workers
- Poor or non-existent health and safety equipment or no health and safety notices
- Any other evidence of labour laws being breached

<sup>16</sup> <https://www.antislavery.org/slavery-today/forced-labour/>

<sup>17</sup> International Labour Organisation, <https://www.ilo.org/global/lang-en/index.htm>



### Case Study

#### **Example of a business model of cost reduction through the use of forced labour:**<sup>18</sup>

Having become homeless, Michael, from Poland, was approached outside a tube station by a man who had his own building firm. "I was dressed in old and dirty clothes and I think he could see that I didn't have anywhere to live," said Michael. "He asked me if I was looking for work, and when I said yes, he offered me accommodation along with a job doing groundwork and laying paving slabs. I was a bit suspicious at first and told him I didn't want to go with him straight away, but I felt I didn't have much choice as the other option was sleeping on the streets."

Michael joined a number of overseas workers at the site where they slept in old caravans and a barn. "I felt like a slave," Michael said. "The boss was very intimidating and did not like us going off the site on our own. He was always asking where I was going and what I was doing. I had no private life. If I wanted to go to the local shop, he would insist on driving me there and back. He was threatening and would say 'I'll kill you' or 'I'll beat you up', half joking but in a frightening way. One of the Irish guys he employed was mentally ill and another one was fleeing the law... I felt like a virtual prisoner and wanted to escape from the situation but felt I couldn't."

#### **Example of a business model of revenue generation through the use of forced labour:**<sup>19</sup>

Thirty Lithuanian workers in Kent were subjected to slave-like conditions and controlled through the use of violence by D J Houghton Catching Services based in Maidstone – a licensed gangmaster who supplied workers to Nobel Foods, one of the UK's largest processors of eggs and chickens. The gangmaster charged workers excessive recruitment fees, deducted £40 a week from workers' wages to live in a damp and infested house, charged workers high amounts for transportation from worksite to worksite, and sometimes stopped paying them entirely, forcing workers into a situation of debt bondage.

The workers alleged they would be told to bring food to last five days and were then bussed around the country from job to job, from Monday to Friday, sometimes being driven for five or six hours at a time between farms before working a night shift. The GLAA's investigation found these workers "suffered exploitation so extreme that the authority had to order the firm to stop supplying workers to farms and food factories immediately" and called the case "one of the worst cases of exploitation the GLAA has ever uncovered in the food supply chain".

Nobel Foods supplied eggs to companies including McDonald's, Sainsbury's, and Marks & Spencer. D J Houghton Catching Services had their licence revoked by the GLAA. They initially appealed, but in March 2014 withdrew their appeal and accepted the revocation of their license.

#### **Example of exploitation in the labour supply chain:**

In 2008, a major construction firm, Skanska, was operating a government Private Finance Initiative (PFI) hospital site in Mansfield worth £600 million. Skanska subcontracted most of the building work to its major subcontractors, including a firm called Baris, who subcontracted dry-lining to a small company called Prodom.

Prodom was paying its dozen Lithuanian workers just £8.80 for a 40-hour working week – a situation that came to light only after some workers stopped being paid altogether. According to the pay slips obtained by the Union of Construction, Allied Trades and Technicians (UCATT), workers "did not receive overtime (some workers worked in excess of 70 hours and took home less than £100) and were charged excessive deductions for rent, tools and utility bills. It is understood that many of these charges were unlawful". UCATT, which uncovered the exploitation, described it as an "appalling systematic abuse of vulnerable workers".<sup>20</sup>

<sup>18</sup> <http://www.gla.gov.uk/media/1584/jrf-forced-labour-in-the-uk.pdf>

<sup>19</sup> As above

<sup>20</sup> As above

## 2.8 Sexual Exploitation



### Definition/ Description

This is when someone is deceived, coerced or forced to take part in sexual activity such as street sex work/prostitution. Places where someone could be sexually exploited are brothels, massage/sauna parlours, escort agencies, pole/lap dancing, forced marriage, stripping on a web cam, phone sex lines, internet chat rooms, pornography, mail order brides or sex tourism.<sup>21</sup>

Sexual exploitation is the sexual abuse of children, young people or vulnerable adults in exchange for food, drugs, shelter, protection, other basic necessities and/or money.

Sexual exploitation could be part of a seemingly consensual relationship, or be used for 'payment' for attention, affection, money, drugs, alcohol or somewhere to stay.

The person being exploited may believe their abuser is their friend, boyfriend or girlfriend. The abuser may physically or verbally threaten the victim, take indecent photographs of them and circulate to others, be violent towards them and try to isolate them from friends and family.

A study carried out with the South East Thames Regional Health Authority found that many of the cases involved one perpetrator offending against several people with learning disabilities. The perpetrator was already known to the victim in 87 per cent of cases.

Sex offenders consider people with a learning disability to be an easy target because they are vulnerable and may be unwilling to bring cases against their abusers (Behind Closed Doors).



### Spot the signs

### Indicators from the National Referral Mechanism (NRM):

(Please tick all relevant boxes).

Adverts for sexual services offering individuals from particular ethnic or national groups

Sleeping on work premises

Movement of individuals between brothels or working in alternate locations

Individuals with very limited amounts of clothing or a large proportion of their clothing is 'sexual'

Only being able to speak sexual words in local language or language of client group

Having tattoos or other marks indicating 'ownership' by their exploiters

Person forced, intimidated or coerced into providing services of a sexual nature

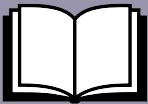
Person subjected to crimes such as abduction, assault or rape

Someone other than the potential victim receives the money from clients

Health symptoms (including sexual health issues)

<sup>21</sup> <https://www.stopthetraffik.org/about-human-trafficking/types-of-exploitation/>





#### Case Study

**Rilindas Story:**<sup>22</sup> Both my parents were alcoholics and I grew up with a lot of domestic violence. I was sexually abused around the age of seven or eight. Mum left and I started taking drugs aged 12 and dealing drugs a few years later. My dad kicked me out and I was arrested a lot from then on.

I ended up living with a lot of older people. I didn't realise that I was being sexually exploited, but I was giving sex to dealers in return for drugs. I suffered a lot of abuse, gang-rape, that kind of thing.

I was sent to Luton for drug rehab, and later had a child. That got me back on track but subsequently I fell back into old habits. When I asked for help, social services put a care order on my child and then I really lost my way.

Azalea gave me love and made me feel safe. I always feel welcome and listened to, and the Azalea team don't give up on you.

**Melody's Story:**<sup>23</sup> While grieving for her mother who had just died, Melody was tricked into coming to England from Nigeria to search for her grandmother. On arrival, she was met by a man who took her to a brothel and told her she would work there until she repaid her flight ticket. Every protest from Melody increased the debt she owed.

Having suffered horrifically, after four years Melody was finally rescued when the police raided the brothel, and she was brought to Unseen.

## 3. Working Together to Prevent Adult Exploitation

National as well as local learning from serious incidents repeatedly show that when organisations work together and share knowledge, the challenges around safeguarding can be made easier for the benefit of the individuals involved.

### 3.1 Reporting Exploitation

Initial enquiries and referrals, can be made to your local MASH office or Safeguarding Adults team in accordance with your respective local authority safeguarding policy and the Bedfordshire agreement below. However, as already mentioned:

**Victims of exploitation are often hidden and therefore not known to adult or child services. Referrals will only meet the safeguarding criteria when they have care and support needs, which many people in situations of exploitation do not. In such cases please contact the Modern Slavery Helpline on 08000 121 700 or call police on 999.**

#### **Bedfordshire Multi Agency Adult Safeguarding Policy, Practice and Procedures:**

[https://www.centralbedfordshire.gov.uk/migrated\\_images/multi-agency-policy-practice-procedures-jan-2018\\_tcm3-19861.pdf](https://www.centralbedfordshire.gov.uk/migrated_images/multi-agency-policy-practice-procedures-jan-2018_tcm3-19861.pdf)

#### **Safeguarding Adults Competency Framework:**

[https://www.centralbedfordshire.gov.uk/migrated\\_images/safeguarding-competencies-2016-2\\_tcm3-17593.pdf](https://www.centralbedfordshire.gov.uk/migrated_images/safeguarding-competencies-2016-2_tcm3-17593.pdf)

<sup>22</sup> Azalea UK, Rilinda's Story

<sup>23</sup> Unseen UK, Melody's Story

**Trafficking of Children and Adults Through Bedfordshire (especially London Luton Airport)  
Roles and Responsibilities of Partner Agencies:**

<http://lutonlscb.org.uk/wp-content/uploads/2017/03/Trafficking-of-Children-and-Adults-through-Bedfordshire-171016.pdf>

**Multi-agency Inter Agency Child Protection Procedures:**

<http://bedfordscb.proceduresonline.com/>

**Government Safeguarding Policy; protecting vulnerable adults:**

<https://www.gov.uk/government/publications/safeguarding-policy-protecting-vulnerable-adults>

<https://www.england.nhs.uk/wp-content/uploads/2017/02/adult-pocket-guide.pdf>

**Bedford Borough Council Safeguarding Adults Team:**

**Tel:** 01234 276222

**Email:** [adult.protection@bedford.gov.uk](mailto:adult.protection@bedford.gov.uk)

**Out of hours emergencies only:** 0300 300 8123

**Central Bedfordshire Council Safeguarding Adults Team:**

**Tel:** 0300 300 8122

**Email:** [adult.protection@centralbedfordshire.gov.uk](mailto:adult.protection@centralbedfordshire.gov.uk)

**Luton Multi-agency Safeguarding Hub (MASH) for Adults and Children:**

**Tel:** 01582 547653

**Email:** [adultsafeguarding@luton.gov.uk](mailto:adultsafeguarding@luton.gov.uk)

**Out of office hours:** 0300 3008123 or in an emergency call 999

### 3.2 National Referral Mechanism (NRM), forms and guidance

From 1 November 2015, specified public authorities have a duty to notify the Home Office about any potential victims of modern slavery they encounter in England and Wales by completing the National Referral Mechanism. You can submit NRMs via this online portal, <https://www.modernslavery.gov.uk/start> regardless of whether the suspected victim consents or not.

**Note:** Whilst this document is specific to identifying and responding to adult exploitation you may also come across a child who you believe may be at risk of or the subject of exploitation. Please refer to the accompanying child exploitation guidance for more information on referrals concerning children.

### 3.3 Intelligence Working with Bedfordshire Police

Whilst law enforcement agencies lead on the investigation element in the vast majority of cases, they also rely on the support of partner agencies to gather and share information/intelligence which will contribute to the identification and understanding of links between the different forms of exploitation and hidden crimes, as well as;

- Identify networks or individuals who pose a risk to adults and children,
- Identify locations being used for the purposes of exploitation,
- Provide evidence in applications to the Court for Civil and Criminal orders and,
- Facilitate prevention, disruption or prosecution in relation to a vulnerable adult or child.

## Multi-Agency Information Submission Form

If you think that you may have information relating to exploitation of adults or children and young people which does not alone relate to a child protection issue or a criminal offence, please complete the multi-agency information submission form. Examples of intelligence/information may include;

- Vehicle details including registration/make/model/colour etc.
- full descriptions including names/nicknames, of suspected perpetrators;
- details/descriptions of unusual/regular callers to a property or children's homes;
- phone numbers of suspected perpetrators;
- address details of suspected perpetrators; and
- Details of addresses or localities that children at risk or being exploited may be being taken or where there have been suspicious activity relating to CSE.

**Note:** Submission of the Multi Agency Information Submission form to Bedfordshire Police does not replace the duty to refer child protection concerns, or to report a crime.

# Multi Agency Information Submission Form

**Restricted / Official when complete**

This form is not a substitute for any safeguarding referral and should not be used as such. Safeguarding referrals continue to be submitted independently to the relevant safeguarding hub.

Consideration should also be given to a M.A. information form also being submitted, to the police, in support of the referral.

“Thank you for your submission. By doing so you are helping to safeguard the vulnerable and assist in the fight against crime.”

**LSCB managers**

## 1. Information arena

Please tick all that apply.

Drugs ☐ Gang ☐ Crime ☐ CSE ☐ Missing ☐ Vulnerability ☐ Other ☐

## 2. Subject details

**Name** (Subjects details or the location if known):

**DOB:**

**Last known address:**

**Date of original event** (or when information was **first** known):

## 3. Information\*

Please use this text box to provide the information that you wish to share in relation to the subject or the location.

\* Please **bold source any intel in red** if you feel there is risk to the source through the sharing of this information clearly state that it is '**sensitive**' and needs to be managed accordingly.



Include any names, actions, significant events, dates, vehicle details and phone or email details (if available).

Remember who, what, where, when and why\*. Please state, at the beginning, in a few words or sentences:

- the reason for your submission
- briefly identifying the perceived risk or concern

This assists CIB and the MASH with their decision making around the information see guidelines if unsure.

#### 4. Known associates

Please use this text box to provide details of known associates. (These may be friends or persons of concern - Please include as much information as possible, names, DOB, addresses, or any identifying factors, phone details, vehicle details, nicknames etc)

#### 5. Original source of information

This includes who and/or where the information has come from in the first place. Please state whether it is yourself, the subject themselves, another source or third party.

**Name:**

**\*Organisation, department and role:**

For example: CBC / Priory School / Safeguarding Lead

**Address:**

**Contact details:**

**Risk to source:**

Please note: the protection of the source of Information is a priority to the Police and the MASH\*

#### 6. Details of submitting partner or agency worker (If different to above):

**Name:**

**\*Organisation, department and role:**

For example: CBC / Priory School / Safeguarding Lead

**Tel:**

**Email:**

**Date of submission:**

## 7. Submit form

Send to: [cibintel@bedfordshire.pnn.police.uk](mailto:cibintel@bedfordshire.pnn.police.uk)

For CIB direct: contact 01234 842777

Send also to your own local authority MASH or Integrated Front Door:

- Central Beds: [AccessReferral@centralbedfordshire.gov.uk](mailto:AccessReferral@centralbedfordshire.gov.uk)
- Bedford Borough: [infosubmission@bedford.gov.uk](mailto:infosubmission@bedford.gov.uk)
- Luton: [MASH@luton.gov.uk](mailto:MASH@luton.gov.uk)

## 8. For multi-agency internal use only

Person ID:

Date forwarded to hub:

Episode ID:

Date passed to Police CIB:

## 9. For Bedfordshire Police CIB use only

Bedfordshire Police will treat all information received in compliance with the Management of

Uploaded to Intelligence System - Y/N   CIRR Reference -

### Police Information legislation (MOPI)

The source will be secure and not available to staff except for limited, dedicated roles. The information must be for a policing purpose for it to be recorded.

Not all information recorded will have a specific outcome generated and may be retained only to assist future research. We reserve the right to share this information with third parties subject to the rules governing such sharing within MOPI.

## 4. Appendix

### Useful Electronic Links - Legislation, Policy, Reference Sites

**Note:** It is important that you keep yourself informed and consider the additional support available to you for vulnerable adults through your local authority, Signpost Bedfordshire, third sector organisations and nationally, such as advice and support services, refuges, drug and alcohol services, Salvation Army and Unseen UK.

#### 4.1 Modern Slavery



##### Legislation & Guidance

##### **Modern Slavery Act 2015**

- **Section 1 Slavery, servitude and forced or compulsory labour**  
<http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted>
- **Section 2 Human Trafficking**  
<http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted>

##### **National Crime Agency – Modern Slavery & Human Trafficking**

<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>

##### **National Referral Mechanism Referral and Assessment Forms**

<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

<https://www.gov.uk/government/collections/modern-slavery> Provides information for professionals about the **duty to notify** and the **National Referral Mechanism form**



##### Useful Links & Contacts

##### Bedfordshire

##### **Unseen**

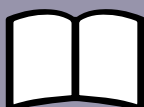
Can provide telephone support for practitioners to complete the NRM form. Unseen run safe-houses for men women and children who are classified as survivors of modern slavery and human trafficking. <https://www.unseenuk.org/>

##### **The Salvation Army**

The Salvation Army can provide a wide range of support for victims of human trafficking and modern slavery. This support ranges from counselling, medical treatment, translation and interpretation services. <https://www.salvationarmy.org.uk/luton>

##### **Signpost for Bedfordshire: 0800 0282 887**

Supports people affected by crime in Bedfordshire as well as information, advice and links to local and national support services. <https://www.signpostforbedfordshire.com/human-trafficking-modern-day-slavery>



##### Useful Links & Contacts

##### National

**Gangmasters and Labour Abuse Authority:** The Gangmasters and Labour Abuse Authority works in partnership to protect vulnerable and exploited workers.

<http://www.gla.gov.uk/>  
<http://www.gla.gov.uk/publications/resources/glaa-videos>

**Crime Stoppers:** National line for anonymous reporting. Speak up, stay safe!  
Tel: 0800 555 111 <https://crimestoppers-uk.org/>

##### **Government publications and resources for modern slavery:**

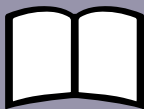
<https://www.gov.uk/government/publications/help-for-adult-victims-of-modern-slavery>  
<https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page>

##### **Home Office modern slavery and marketing resources:**

<https://www.gov.uk/government/collections/modern-slavery>  
<https://www.gov.uk/government/collections/modern-slavery#-promotional-materials>

**The National Association for People Abused at Childhood: 0808 801 0331**  
<https://napac.org.uk/>

## 4.2 Criminal Exploitation



### Useful Links

#### See also Modern Slavery

##### County Lines

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

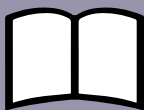
##### Trafficking into crime and begging

<https://www.antislavery.org/what-we-do/past-projects/trafficking-crime-begging/>

##### HM Government Ending Gang Violence & Exploitation:

<https://www.gov.uk/government/publications/ending-gang-violence-and-exploitation>

## 4.3 Domestic Servitude



### Useful Links

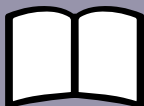
#### See also Modern Slavery

Home Office - Domestic Slavery z-Card - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/634842/Modern\\_Slavery\\_Z-Card\\_2.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/634842/Modern_Slavery_Z-Card_2.pdf)

<https://www.gov.uk/government/publications/domestic-slavery>

<https://www.salvationarmy.org.uk/modern-slavery>

## 4.4 Forced Marriage



### Useful Links

#### See also Modern Slavery

[Circular 010/2014: new forced marriage offences - GOV.UK](#)

[Multi-Agency practice guidelines: Handling cases of forced marriage – GOV.UK](#)

Step-by-step advice for frontline workers, including health professionals, education, police, children's social care, adult social services and Housing

[Multi-Agency Statutory Guidance for dealing with forced marriage](#)

Guidance for all persons and bodies who exercise public functions in relation to safeguarding and promoting the welfare of children and vulnerable adults.

<https://www.gov.uk/guidance/forced-marriage#our-publications-and-other-resources>

[‘The Right to Choose’](#) issued under s.63 Q(1) Forced Marriage (Civil Protection) Act 2007

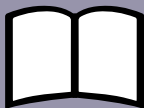
<http://www.signpostforbedfordshire.com/forced-marriage>

- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/879927/Forced\\_Marriage-survivors\\_handbook.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/879927/Forced_Marriage-survivors_handbook.pdf)

- <https://www.gov.uk/guidance/forced-marriage>

- <https://karmanirvana.org.uk/>

## 4.5 Human Trafficking



### Useful Links

#### See also Modern Slavery

A Government leaflet outlining the support available for victims of human trafficking is available in 11 foreign languages <https://www.gov.uk/government/publications/support-for-victims-of-human-trafficking>

##### Stop the Traffik - Spot the signs

<https://www.stopthetraffik.org/spot/dashboard.html>

[Sexual Offences Act 2003, Sections 47 - 60C - https://www.legislation.gov.uk/ukpga/2003/42/contents](https://www.legislation.gov.uk/ukpga/2003/42/contents)

<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>



## 4.6 Domestic Servitude



Useful Links

### See also Modern Slavery

- <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>

## 4.7 Sexual Exploitation



Useful  
Links

### See also Modern Slavery

Sexual Offences Act 2003 (SAO) section 30, Offences against persons with a mental disorder impeding choice - <https://www.legislation.gov.uk/ukpga/2003/42/section/30>

SOA section 34 - Inducements etc. to persons with a mental disorder - <https://www.legislation.gov.uk/ukpga/2003/42/section/34>

SOA section 38 - Care workers: sexual activity with a person with a mental disorder - <https://www.legislation.gov.uk/ukpga/2003/42/section/38>

<https://www.legislation.gov.uk/ukpga/2003/42/contents>

SOA section 51A-54 Prostitution - <https://www.legislation.gov.uk/ukpga/2003/42/part/1/crossheading/exploitation-of-prostitution>

SOA section 77 Consent - <https://www.legislation.gov.uk/ukpga/2003/42/part/1/crossheading/supplementary-and-general>



**BEDFORDSHIRE POLICE**

Protecting People and Fighting Crime

*Together*



# YouTurn

Restore, Reform & Reintegrate



Bedford Borough  
Safeguarding Children Board



Central Bedfordshire  
Safeguarding Children Board



Prepared by Francoise Julian  
**Luton Safeguarding Children & Adults Boards**