

Understanding the Potential of Licensing Frameworks and Teams to **Tackle Modern Slavery in the UK**



Concluding Remarks and **Appendices**

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Concluding Remarks

The Modern Slavery Act 2015 led to significant improvements in the national and local response to tackling modern slavery, including an increase in the number of people affected by modern slavery and perpetrators being identified. This change is evidenced by several best practice case studies identified in this report. However, a more consistent, effective response is hindered by: 1) gaps in national and local policy; 2) gaps in agency capacity and resources as a result of a fragmented regulatory regime; and 3) low knowledge levels among statutory authorities and local businesses. These rectifiable barriers should be addressed to embed an effective anti-modern slavery response across the UK, and they can be.



Licensing frameworks and teams provide an excellent opportunity to utilise existing frameworks to support anti-modern slavery efforts in line with the day-to-day roles of licensing authorities. As evidenced in this report through the example of the Licensing Act 2003, national government amendments to relevant legislation and statutory guidance will lead to timely, robust and consistent reform of relevant local policies and frameworks.

To ensure effective, practical implementation of national and local policy, professionals must have a sufficient understanding of 1) modern slavery; 2) their responsibilities in tackling it; 3) the tools available to deter and disrupt it; and 4) which agencies and organisations to collaborate with and how. If the recommendations in this report are acted upon, they will have a significant impact in addressing modern slavery abuses.

Related to this, knowledge levels of modern slavery are intrinsically linked to understanding and engagement of this issue by local businesses. As the interface between policy and practical implementation, officers and inspectors are best placed to provide practical support, knowledge and guidance to local businesses. This is the final step change that will facilitate a shift in approach from a mainly reactive response to tackling modern slavery to a more proactive and preventative one. If national government guides these changes, it will better equip licensing authorities to address this issue locally. More modern slavery cases will be identified, and people affected by modern slavery will be able to access support, and traffickers will be brought to justice.

Appendices

Appendix 1: Key Terminology

Terminology	Definition
Environmental Health	An organisation responsible for promoting and safeguarding public health by managing and enforcing regulations related to environmental factors that can impact human well-being, such as food safety, air quality, sanitation, and pollution control.
Licensable Activity	An activity or business operation that requires obtaining a license or permit from a regulatory authority in order to legally operate or provide certain services.
Licensing Conditions	Specific terms and requirements, or restrictions that are attached to a licence. These conditions must be met by individuals or organizations holding a license in order to ensure compliance with regulatory standards and maintain public safety or welfare.
Licensing Authorities	Government or regulatory bodies responsible for granting, monitoring, and enforcing licenses in specific industries or sectors.
Licensing Framework	A structured set of rules, regulations, and procedures that govern the process of granting and managing licenses within a particular jurisdiction.
Model conditions	A list of conditions that serve as a reference or template for licenses, typically providing a consistent framework for compliance.
Modern slavery	The exploitation and control of individuals through various forms of forced labor, human trafficking, debt bondage, or other forms of servitude in violation of their human rights.
National Referral Mechanism	The UK's formal system to identify and assist victims of human trafficking and modern slavery, ensuring they receive appropriate support and access to specialized services.
Primary Legislation	The fundamental laws and statutes enacted by a legislative body, typically representing the highest level of legal authority and providing the framework for subsequent regulations and legal instruments.
Statutory Guidance	Official guidance documents issued by relevant authorities to provide interpretation, clarification, and practical advice on how to comply with specific statutory obligations or requirements.

Appendix 2: Examples of activities undertaken in collaboration with local authority licensing departments as part of our role as HMSP coordinator included:

- **Activity 1 - A Public Awareness Campaign on Taxis (July-October 2018):** Produced publicity materials (A5 flyer, air freshener and window sticker) which were disseminated through local licensing officers (local authorities and police) to taxi/private vehicle operators and drivers across the county.
- **Activity 2 - A Licensing Workshop (January 2019):** Delivered a licensing focused modern slavery workshop to licensing leads across all 11 local authorities in Hertfordshire in collaboration with Hertfordshire Constabulary and the Modern Slavery and Exploitation Helpline.
- **Activity 3 – Modern Slavery Content in Local Licensing Policies (2018-2021):** Supported five local authorities with embedding modern slavery content in local licensing policies/frameworks in line with prescribed consultation periods.

(These policies include: 1) Hertsmere Borough Council: Statement of Licensing Policy; 2) Watford Borough Council: Taxi and Private Hire Strategy 2020-2035 (the draft can be viewed online); 3) Dacorum Borough Council: Taxi and Private Hire Licensing Policy and 4) Dacorum Borough Council: Statement of licensing policy 2021-2026; 5) East Hertfordshire District Council: Statement of Licensing Policy 2021-2026; and 6) Broxbourne Borough Council: Licensing Act 2003 Statement of Licensing Policy 2021-2026)

- **Activity 4 – Specialist Training to the Environment Agency (January 2020):** Delivered specialist modern slavery-waste training to the Environment Agency (Hertfordshire and North London Team) in collaboration with the GLAA and Stop the Traffik.
- **Activity 5 – Regional Licensing Group Support (2018-2021):** Delivered inputs and provided support to the Hertfordshire and Bedfordshire Licensing Group.

Appendix 3: Modern Slavery Content extracted from Broxbourne Borough Council's Gambling ACT 2005 Statement of Licensing Policy 2022 - 2025¹

The licensing authority acknowledges the duties, requirements and obligations placed on it in respect of the application of this statement as a public body and the statutory duty to consider the following legislative requirements:

Crime and Disorder Act 1998

Local authorities are required to make due regard to the crime and disorder implications of any decision it makes.

Human Rights Act 1998

Local authorities are required to implement the Act in a manner consistent with the Human Rights Act 1998.

¹ For contrast, view Broxbourne's 2019 – 2022 policy. Borough of Broxbourne (2019) Borough of Broxbourne Gambling Act 2005 Statement of licensing policy 2019 – 2022: <https://www.broxbourne.gov.uk/downloads/file/646/ms-2018-12-11-licensing-gamblingstatementofprinciples2019-22>

Equality Act 2010

Local authorities are required to implement the Act in a manner consistent with its responsibilities to consider the equality implications of any decision it makes.

Protecting Children, Young People and Adults at Risk

The Council believes that all licensed premises have a responsibility to ensure that safeguarding is a key priority for all businesses in respect of staff, customers and any person in the vicinity of the premises.

All business owners and management should sufficiently understand safeguarding matters including, but not limited to:

- gangs and knife crime;
- county lines;
- **modern day slavery;**
- **child sexual exploitation;**
- supply, distribution or taking of illegal substances;

to enable them to spot warning signs of any safeguarding matter and know who to report it to.

Information and training materials can be found on the websites of Hertfordshire County Council and Hertfordshire Police.

Applicants and licence holders are encouraged to ensure that suitable management controls are in place to address potential safeguarding concerns. Measures could include, but would not be limited to:

- awareness training for staff, including indicators to look out for;
- regular patrols of the premises, including external areas and the immediate proximity, to identify any vulnerable persons;
- close monitoring of patrons as they leave the premises;
- recording and reporting concerns to the police;
- implementing suitable safeguarding policies and procedures.

Safeguarding Against Child Sexual Exploitation

The Council acknowledges that child sexual exploitation (CSE) awareness does not just apply to children on licensed premises, particularly as children are not permitted access to most gambling premises. Applicants and licence holders should be equally aware of children in the proximity of the premises that may be waiting for, or seeking older persons.

Applicants and licence holders are encouraged to ensure that suitable management controls are in place to safeguard children against the risk of CSE. Measures may include, but are not limited to:

- awareness training for staff;
- regular patrols of the premises, including external areas and the immediate proximity, to identify any vulnerable children;
- close monitoring of patrons as they leave the premises;
- recording and reporting concerns to the police.

Appendix 4: Modern Slavery Content extracted from Dacorum Borough Council's Tax and Private Licensing Policy 20212

Exploitation and Modern Slavery

Taxi and private vehicle operators and proprietors must be aware of and meeting their obligations under all relevant legislation, including the Modern Slavery Act 2015, The Conduct of Employment Agencies and Employment Businesses Regulations 2003 and the National Minimum Wage Act 1998.

1.1 Overview

Modern slavery happens everywhere, including here in the UK. It operates in plain sight and can affect businesses without them even knowing. As covered within this strategy, drivers are on the frontline and may identify issues, which should be reported. However, it is also crucial that all businesses, including taxi and private vehicle operators, understand how they might be affected so that they can take steps to reduce the risk. Exploitation accounts for all situations that stray away from 'decent work', from labour market infringements and abuse, all the way to more severe forms of exploitation.

1.2 Examples of labour market infringements that have been known to be experienced by drivers include: 1) Long hours, 2) insufficient pay (e.g. non-payment of minimum wage), 3) poor working conditions, 4) bogus self-employment; and 5) control by an unscrupulous third-party agency.

1.3 Other examples of labour market infringements include: 1) Lack of personal protective equipment (PPE); 2) Few or no breaks; 3) Demeaning treatment; 4) Retention of identity documents or valuable possessions, 5) Restriction of movement or confinement to the workplace; and 6) Threat of denunciation to authorities (mainly illegal migrant workers).

1.4 There are also specific examples of practice that sometimes occur within taxi and private hire businesses, which can create vulnerability and increase the risk of exploitation of drivers and office staff. Subcontracting of private hire vehicles is a common practice used by licensed operators during peak times but results in more opacity in terms of worker welfare because the operator will be using drivers that it doesn't directly employ in this scenario. Taxi drivers can experience It is important that licensed operators take account of their own anti-slavery policies and practices, as well as those of subcontractors and third-party agencies.

1.5 In line with being a signatory of the [Modern Slavery Charter](#), the Council is committed to ensuring that there is no exploitation in its supply chains. In the same vein, it also committed to ensuring that there are no exploitative practices taking place in Dacorum by any local businesses. The council expects all taxi and private vehicle operators to operate in line with UK labour laws. If an incident were discovered and it was clear that no prior action had been taken to prevent or mitigate the risk of exploitation, this would prompt an investigation by the council. Appropriate enforcement action may be taken, where complaints of such are substantiated. Dependent upon the severity and circumstances of such incidents, action may include prosecution and/or suspension or revocation of licences.

1.6 Taxi and private vehicle operators should work to prevent labour exploitation and modern slavery by taking steps to mitigate the risks of exploitation and undertaking effective due diligence. This

2 Dacorum Borough Council (2021) Taxi and Private Hire Licensing Policy, part D, section 35: [http://www.dacorum.gov.uk/docs/default-source/licensing-documents/taxi/final-taxi-licensing-policy-\(1-4mb\).pdf?sfvrsn=89ac029e_2](http://www.dacorum.gov.uk/docs/default-source/licensing-documents/taxi/final-taxi-licensing-policy-(1-4mb).pdf?sfvrsn=89ac029e_2)

includes 1) promoting awareness of worker rights, 2) encouraging reporting of concerns by drivers and head office staff, by creating a clear internal reporting pathway that is understood by workers, 3) conducting internal checks and checks of subcontractors and 4) committing to upholding high ethical standards.

All worker communications should be translated into the languages that make up the operator's workforce. (For more information on how to undertake these steps, see the [Modern Slavery SME Toolkit](#))

1.7 The council is working towards updating the license application form to include a section for operators to demonstrate how their business is or will take steps to reduce the risks of exploitation/modern slavery of staff and drivers, including confirming use of any third-party agencies (agencies include those used for recruitment, temporary employment, and services). Supporting this, we encourage all taxi operators to produce modern slavery transparency statements, which would publicly demonstrate the company's commitment to this. The council will publish its own modern slavery statement by the end of 2021.

1.8 Section 54 of the Modern Slavery Act 2015 requires companies with a turnover of more than £36 million to produce a modern slavery transparency statement. This statement should detail what steps have been taken prevent exploitation within its company and supply chain. Any taxi or private vehicle operators that meet this requirement must register the statement on the [UK Government portal](#) and provide a copy to the council as part of any new license application.

1.9 Taxi and private vehicle operators should ensure the following at a minimum in order to mitigate risk of exploitation among its workers: 1) provide every worker with a written contract in a language they understand detailing working hours, pay/overtime rates, deductions (if any), holiday and sick pay entitlements and accommodation arrangements (if relevant), 2) ensure clear reporting channels for grievances and whistleblowing and that workers are made aware of these procedures, 3) check payroll to ensure worker's wages are paid directly to them, that workers are being paid the national minimum wage at a minimum, and that no workers have paid any fees related to their recruitment, 4) raise awareness of the signs of exploitation with workers. It is important to ensure that any independent contractors (e.g. self-employed taxi drivers) are in fact agreeing to a fair contract and where work, fare and contract termination are agreed by both parties.

1.10 Taxi and private vehicle operators should also conduct effective due diligence of any third-party agencies. Due diligence should be conducted on all agencies before working with them to ascertain what standards they have in place to protect workers. Checks should later be conducted directly with workers to ensure the agency is upholding the agreed standard.

1.11 Before working with a third-party agency, taxi and private vehicle operators should always check that:

- 1.11.1. The company is licensed to provide temporary labour to the hackney carriage and private hire vehicle sector.
- 1.11.2 The company's directors are not listed on the Employment Agency Standards Inspectorate's list of people that have been prohibited from running an employment agency/business due to past misconduct.
- 1.11.3 The company only subcontracts with an operator's authorisation and conducts their own due diligence on subcontractors when we give permission to subcontract.

- 1.11.4 The company has a clear commitment to not charging recruitment fees and to covering the cost of recruitment when sourcing workers from overseas.
- 1.11.5 The company has an accessible and transparent reporting mechanism that all workers can use to report concerns or issues.
- 1.11.6 The company provides information to their workers on what optional services they offer, how much they cost, and how the workers can refuse or cancel them without penalty.

1.12 In the course of working with a third-party provider of drivers, taxi and private hire operators should periodically review a sample of driver's key documents to ensure required labour standards are being met. Key documents to be reviewed could include: 1) payslips (i.e. to check that the number of hours match operator records, that all workers are being paid at least the NMW, that optional services are clearly indicated, and that correct taxes and national insurance contributions are being paid); and 2) right to work checks. Additionally, taxi and private hire operators are encouraged to speak with all workers directly, on occasion, to ascertain if any labour market infringements have been made.

1.13 If a taxi or private vehicle operator identifies any concerns or irregularities, they should discuss this with the third-party agency to ensure they are rectified. If the agency refuses or fails to rectify the issues, the taxi or private vehicle operator should report their concerns to the council licensing team and to the Gangmasters and Labour Abuse Authority (GLAA): 0800 432 0804.

1.14 If a taxi or private vehicle operator wishes to seek advice or report concerns anonymously, then they can contact the 24/7 Modern Slavery and Exploitation Helpline on 08000 121 700 or via their website. This information should be shared with workers as well who may wish to report concerns.

Appendix 5: Borough of Hertsmere Embedded a Modern Slavery Section in their Statement of Licensing Policy Under the Licensing Act 2003, Section 6

Modern slavery is a crime. The UK Modern Slavery Act 2015 includes the following under the offence of modern slavery:

- Slavery, where ownership is exercised over a person,
- Servitude, where a person is obliged to provide services imposed by coercion,
- Forced or compulsory labour, which involves work extracted under the menace of penalty and for which the person has not offered himself voluntarily, and
- Human trafficking, which involves the movement of people by means such as force, fraud, coercion or deception with the aim of exploiting them.

In the UK, estimates go as high as 136,000 when quantifying the number of hidden victims living in conditions of slavery. In the European hospitality sector, which includes bars and restaurants, a recent study found 110,000 victims of exploitation annually. Government agencies in the UK have specifically identified hospitality as a high-risk area for modern slavery.

Licensed premises might be unwitting hosts to modern slavery in two ways:

1. Victims and their traffickers visiting the establishment. Sexual exploitation and forced criminality would be the most common forms identified in this way.
2. Staff being recruited through unscrupulous means, leaving them trapped and/or indebted to a trafficker.

Identification and Reporting

Staff at licensed premises can have the power to identify and report any exploitation they encounter. A licence holder may ensure awareness of modern slavery by:

- Identifying any risks at the premises and working with relevant business partners and suppliers (i.e. recruitment agencies) to mitigate such risk.
- Actively informing those working on the premises of their rights and how they can confidentially seek help or advice on modern slavery if required.
- Provide regular training to all staff on the indicators of modern slavery and how to report concerns.
- Establishing strong relationships with local police and victims service providers, such as the national Modern Slavery Helpline (0800 0121 700), in advance of any incident.

Reporting Protocols

Having **clear and straightforward protocols** for when an incident is discovered is crucial to ensure that victims get appropriate support. Where employees identify a potential victim, they can follow a **specific internal procedure** in order to protect the safety of that individual.

The procedure should **1) not be overly complex, 2) should involve senior level staff and 3) should account for when reporting should go immediately to the police** (i.e. if certain indicators are met, if the potential victim is in immediate danger, if the potential victim is a child).

The Modern Slavery Helpline (0800 0121 700) can provide support to anyone who has a suspicion and would like some guidance on next steps, 24 hours a day.

Useful Resources

- Blueprint training (<https://shivafoundation.org.uk/our-work/stop-slavery-blueprint/#section5>)
- Indicator list (https://shivafoundation.org.uk/wp-content/uploads/2022/11/18_SF_SSB_Sec05_Indicator-List.pdf)
- Example policies (<https://shivafoundation.org.uk/our-work/stop-slavery-blueprint/#section2>)

Appendix 6: Modern Slavery content extracted from Watford Borough Council's Mandatory Training for Taxi Drivers Handbook

Safeguarding

Over the past few years there has been a significant increase of focus on the role of drivers in 'safeguarding' taxi and private hire passengers. Safeguarding is a broad term and it may be more helpful for you to think about it as 'looking after people'. As 'fit and proper' people drivers have always been expected to look after people. The only change to this now is that you are being given more information on how you can do this effectively and safely. If you do not think you want to do this you should consider very carefully whether applying for a licence is the right decision for you.

There are different types of safe-guarding concerns that you may be able to help us with. We need you to help to spot and report any concerns about the following:

- Child Sexual Exploitation
- Modern Slavery and Human Trafficking
- Drug Dealing through 'County Lines'
- Extremism

Over the next few pages, you will be given some outline information on each of these; what they are, how to spot them and how to report them. You will be given more detailed information as part of the training package attached to this handbook.

Particular care should be taken when carrying children and young people, especially when they are not accompanied by an adult. Although there will usually be a perfectly ordinary reason for them travelling, we ask drivers to remain vigilant to any unusual circumstances or signs that things are not right.

Any person under 18 is legally classified as a child. Drivers who have concerns about the safety of any child travelling in their vehicle are asked to report those concerns to the police by dialling 101, or in an emergency, 999.

General concerns may include:

- Picking up a child or young person late at night
- Picking up a child or young person who appears to be under the influence of drink or drugs
- Picking up or dropping off a young person at a location that seems inappropriate such as a hotel

Remember, you may not think it is your business but this person may need your help to escape a bad situation.

Modern Slavery and Human Trafficking

Modern Slavery describes a situation where a person is forced to work – through coercion or mental or physical threat.

They may be owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse, dehumanised and treated as a commodity or bought and sold as 'property'.

They may be physically constrained or have restrictions placed on their freedom of movement but often the restrictions they face are the result of mental abuse.

Use this checklist if you have concerns that your passenger(s) may be victims of Modern Slavery and Human Trafficking:

Physical appearance

- Is fearful, anxious, depressed, submissive, tense, or nervous/paranoid.
- Exhibits unusually fearful or anxious behaviour/Appear withdrawn/Avoids eye contact.
- Appears malnourished.
- Shows signs of physical and/or sexual abuse, physical restraint, confinement, or torture.

Isolation

- Who else is travelling with the person?
- Not allowed to travel on their own.
- Rarely interacts with others.
- Unfamiliar with their neighbourhood or where they work.
- Seem under the control of others.

Lack of control

- who booked the journey?
- Has few or no personal possessions.
- Is not allowed or able to speak for themselves (a third party may insist on being present and/or translating).
- May wear the same clothes every day or wear clothes that are inappropriate for the work being done.

Poor living conditions

- where are you picking up and dropping off?
- Dirty cramped environment.
- Over-crowded accommodation.
- Living and working at the same place.

Unusual travel times

- Maybe dropped off and collected for work on a regular basis either very early or late at night.

Drug Dealing through 'County Lines'

'County Lines' describes an operational method through which gangs and organised crime networks exploit children and vulnerable adults to sell drugs.

Often these children and adults are made to travel across counties away from larger Towns and Cities where they are placed in smaller towns and rural areas. The "County Line" is the mobile phone line used to take orders for drugs.

The controlling gangs are based in large cities many miles from the front line supply. They are insulated from the risk of selling and enforce these structures with extreme violence.

Use this checklist if you have concerns that your passenger(s) may be victims of 'County Lines':

- A child or young person going missing from school – they are in your vehicle and it is school time.
- A child or young person going missing from home or significant changes in emotional well-being
- A young person meeting adults in strange circumstances
- A change to the behaviour of children you know well
- The use of drugs and alcohol in your vehicle
- Young people or children acquiring or showing money or expensive gifts where you think it seems unlikely they could account for how they got them.
- Lone children from outside of the area travelling at strange times of day and paying in cash from large denomination bank notes.
- Individuals with multiple mobile phones or tablets or 'SIM cards'
- Young people with more money, expensive clothing, or accessories than they can account for
- Unknown or suspicious looking characters coming and going from a houses you regularly drop off or pick up from
- Young people in relationships with controlling or older individuals or associated with gangs
- A suspicion of self-harm, physical assault or unexplained injuries

Appendix 7: List of Roundtable Attendees

Local, Licensing or Regulatory Authority	Department/Role
Hackney Council	Taxi Licensing
Three Rivers District Council	Licensing Team
Mid Sussex District Council	Licensing Team
Chichester Council	Licensing Team
Department for Business, Energy and Industrial Strategy	Employment Agency Standards
East Herts District Council	Licensing and Enforcement President for Hertfordshire and Bedfordshire Licensing Group
St Albans City and District Council	Licensing Officer Vice President for Hertfordshire and Bedfordshire Licensing Group
Broxbourne Council	Environmental health
Chichester Council	Licensing Team
Brighton & Hove Council	Licensing & Trading standards
Environment Agency	Environmental Crime
West Sussex County Council	Supplier relationships
Hampshire & Isle of Wight	Modern Slavery Coordinator
Westminster City Council	Head of Licensing and Regulatory Services
Royal Borough of Kensington and Chelsea	Licensing Enforcement Officer
Royal Borough of Kensington and Chelsea	Modern Slavery and Exploitation Coordinator Bi-Borough
London Borough of Hammersmith and Fulham	Environmental health
London Borough of Hammersmith and Fulham	Environmental health
West Sussex County Council	Trading Standards
West Sussex County Council	Community Safety and Wellbeing
West Sussex County Council	Community Safety and Wellbeing
Shiva Foundation	
Hull City Council	Planning Enforcement
West Sussex County Council	Fire and Rescue Services
Gangmaster and Labour Abuse Authority	Senior Licensing Officer
STOP THE TRAFFIK	
Birmingham City Council	Environmental health
London Borough of Hammersmith and Fulham	Licensing enforcement

Appendix 8: Key Licensing Actions Undertaken by Licensing Authorities

Licensing Authority	Key Licensing Actions
Birmingham City Council	Training for licensing teams
Brighton and Hove City Council	Joint operations to raise awareness of modern slavery including modern slavery wording in licensing policy
Environment Agency	Dedicated modern slavery e-learning course
Hampshire County Council	Training for Portsmouth Housing Regulation team
Hertsmere Borough Council	Modern slavery wording in their licensing policy
London Borough of Hammersmith and Fulham (LBHF)	Modern slavery wording in their special treatment licence policy and their multi-agency licensing group.
London Borough of Kensington and Chelsea (LBKC)	Embedded modern slavery focused frameworks for inspection of licensed premises.
Westminster City Council:	Supplementary documents on modern slavery to support licensing policy
West Sussex County Council	Training for fire and rescue services and taxi drivers and joint operations with local partnership groups.

Appendix 9: Questions asked by Royal Borough of Kensington and Chelsea when dealing with suspected brothels

For Manager or Person in Charge

- Who owns the business?
- What is your position here today? Are you the person in charge?
- If you are not the licensee may I see the written notification that you are in charge of the premises today?
- Where is the prominently displayed notice stating that you are in charge of the premises today?
- Who takes payment for services offered?
- What services are offered?
- How is payment taken?
- What account are cash/card payments paid in to?
- How many therapists work here?
- Are they employed directly or self- employed?
- Can you show me records of salary payments to the therapists (if employed directly)?
- Where do the therapists keep their personal belongings? Do they have lockers etc.?
- Where do you advertise your business?
- What qualifications do your therapists have?
- Do you have copies of your therapists' qualifications?
- Are therapists qualified to carry out the services offered?
- Are any sexual services provided by therapists?
- Have checks been done on the immigration status of employees as required by the Home Office?
- Do you have copies of passports/visas/documentation proving employees' entitlement to work?
- What are the operating times of the premises?
- Can I see the appointments diary?

- Can I see the clients' medical questionnaires that you are required to keep?
- Can I see your records of the names, addresses and dates of birth of all persons receiving licensable treatments today and yesterday?
- How many clients are in the premises now receiving treatments? (Check against appointments diary)
- How many therapists are working in the premises now?

Question For Therapists

- How long have you worked here?
- How did you find out about this job?
- Do you have a contract of employment with the operator?
- What treatments do you provide?
- What qualifications do you have?
- Where did you do your training?
- Do qualifications match the therapies offered?
- Do clients directly pay you any money?
- If yes, what for?
- How do they pay?
- What do they pay you for?
- Are you a salaried member of staff or self- employed?
- How do you get paid by your employer?
- Do you offer any sexual services to clients?
- Are you working here of your own free will?

Appendix 10: Brighton and Hove's Child Sexual and Criminal Exploitation of Children: Guidance for Hotels and Bed and Breakfasts

Sexual and Criminal Exploitation of Children. Guidance for Hotels and Bed and Breakfasts



What is Child Sexual Exploitation?

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:

- (a) In exchange for something the victim needs or wants, and/or
- (b) For the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. Like all forms of child sexual abuse, child sexual exploitation:



- Can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex.
- Can still be abuse even if the sexual activity appears consensual.
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
- Can take place in person or via technology, or a combination of both.
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- May occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example).
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

It is important to remember that child sexual exploitation is never the victim's fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.



What is Criminal Exploitation of Children?

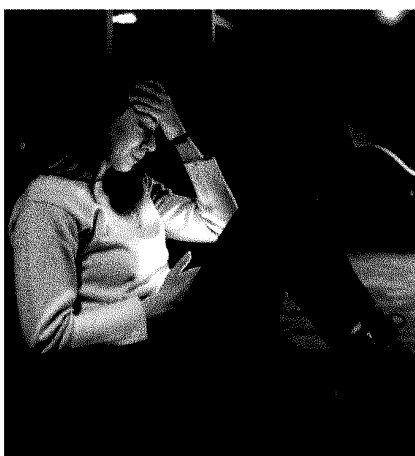
Criminal exploitation of children and vulnerable adults is a geographically widespread form of harm that is a typical feature of county lines activity.

County lines 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) as gangs use children and vulnerable people to move drugs and money.



How does it affect young people and vulnerable adults?



Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults.
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection). It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a young person who engages in county lines activity to stop someone carrying out a threat to harm his/her family.

What do Hotel Managers need to know about the exploitation of children?

Hotels and Bed and Breakfast establishments are often used as a place to exploit and abuse victims.

There are a number of criminal offences associated with child exploitation which could have damaging consequences for a hospitality business, including a possibility of prosecution, action being taken against a premises licence and reputational and/or financial damage.

It is the responsibility of premises licence holders and their managers to make sure that suitable control measures are in place at licensed venues for the protection of children from harm.

This is a legal requirement under the Licensing Act 2003 and there are legal implications if you do not have safeguards in place or fail to act if sexual exploitation of children occurs, or is believed to have occurred, on your premises.

Under Section 116 of the Anti-Social Behaviour, Crime and Policing Act 2014 the Police have powers to serve a notice on a hotel owner, operator or manager requiring guest information in connection with child exploitation. This notice can be served when an officer reasonably believes a hotel premises has been or will be used for the purposes of:

- (a) Child sexual exploitation.
- (b) Conduct that is preparatory to, or otherwise connected with, child sexual exploitation.



What actions are required to protect your business?

You should accurately record the details of anyone staying within your establishment (name, address, telephone number and date of birth) and check and record a copy of photo identification of guests. If you do not provide accurate records to the Police upon their request, you may be prosecuted by the courts and issued with a fine not exceeding £2500.

Indicators that a child may be being exploited sexually or criminally

- Guests accessing an unusual amount of pornography (TV or computer)
- Guests who appear secretive about who they are with and/or activities in their room
- Young person who appears withdrawn, afraid, or frightened
- Young person who appears under the control or instruction of another
- High traffic to a guest room
- Repeat visitors to the hotel at irregular hours /during the night
- Young person(s) checking in with an adult or group of adults
- Young people meeting others in public areas /external areas of the hotel
- Young people clearly under the influence of alcohol or drugs
- Lots of male visitors to a room
- Noise complaints
- Evidence of alcohol, drug, or substance misuse and/or condom wrappers
- Signs of a 'party' being held in the room
- Guests who appear secretive about activities in their room, who don't want rooms cleaned and/or use the 'do not disturb' sign
- Multiple visitors, who are not guests at the hotel, visiting a room
- Signs of sexual activity having taken place in a room where young people have stayed or visited

If you think the young person is at immediate risk of harm,
call 999 to report your concern

Offer support to the young person:

- Ask if they are ok
- Don't serve them any alcohol or allow anyone to buy them another drink. Check that they are not receiving unwanted attention
- Check whether they know who they are with and if they feel safe being/leaving with them
- Offer to call a licensed taxi for them
- Offer to call a parent/carers
- Ask CCTV to monitor them

Other actions to consider:

- Download and secure any CCTV
- Identify methods of payments i.e. cash/credit/debit cards
- Secure any information regarding key card usage for the rooms
- Secure any information regarding items left behind
- Secure the hotel room(s) until police arrive
- Report any relevant vehicle registrations

SAFEGUARDING CHECKLIST

- Nominate a safeguarding representative**
- Keep refusal records**
- Maintain an incident logbook**
- Encourage staff to make eye contact and engage in conversation to inquire about the reason for guests' visit or stay**
- Distribute and display exploitation literature and materials in staff areas**
- Undertake age verification checks**
- Only accept photo ID**
- Restrict unregistered persons in guest rooms between 11pm and 7am**
- Install CCTV monitoring and retain CCTV recordings**
- Require visitors to use the main entrance to the premises**
- Share information and intelligence appropriately**
- Report suspicious activity to local police**
- Include child exploitation in your business risk assessment**
- Undertake patrols (walk hallways and perimeter)**

Remember you can also share information via Crimestoppers:
crimestoppers-uk.org/give-information/give-information-online

CrimeStoppers.
0800 555111
100% anonymous. Always.

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Child Sexual Exploitation: What to look out for

- Adult guests who appear secretive about their visit or are trying to conceal that they are with a young person
- Adult guests refusing to leave credit card imprint and paying in cash
- Adult guests requesting a room that is isolated
- Guests who move in and out of the premises regularly at unusual hours
- Young people who appear under the control or instruction of others
- Young people clearly under the influence of alcohol or drugs
- Signs of sexual activity having taken place in a room where young people have stayed or visited

- Numerous adults and young people coming to the hotel who do not appear to have a reason for being there or high levels of visitors to a guest room
- Guests arriving and asking for a specific room number without knowing the name of the person who the room is booked under
- Adult guests who don't want their room cleaned or visited

DON'T IGNORE THAT GUT FEELING.
IF SOMETHING DOESN'T SEEM RIGHT.

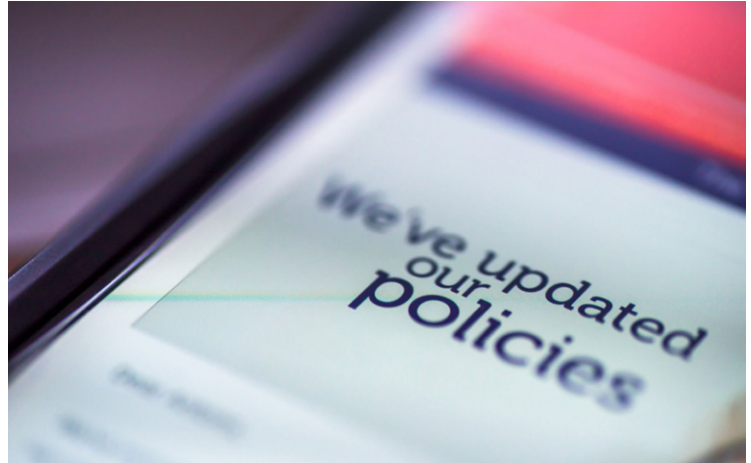
**SAY SOMETHING
IF YOU SEE SOMETHING**

Report online at www.sussex.police.uk
or call 101 and quote Operation Makesafe.
In an emergency always call 999.

Find us on social media    

Appendix 11: Inspecting HMOs

local fire and rescue service fire safety teams have the remit to conduct inspections at several different types of premises, including care homes, high-risk residential buildings, licenced premises, high-risk public spaces and events with large numbers of people. Local authority housing officers also have authority to inspect specific types of properties where house occupancy reaches a certain level: commonly referred to as housing in multiple occupation (HMOs). Officers are expected to ensure all information provided in the licence application is correct, that the licence is adhered to and to identify any deficiencies that might exist.



Inspecting HMOs

Exploring HMOs in a bit more detail, it is widely accepted that they are at a high risk of enabling modern slavery, with property owners found to be effectively running a business linked to accommodation provision. This business model enables a blurring of boundaries, with the employer offering supposedly 'free' accommodation, which is either paid for via deductions in the worker's wages or as a reason for non-payment of any wages. Frontline staff or inspectors visiting HMOs and conducting relevant office checks may encounter a number of modern slavery indicators including:

1. National insurance numbers registered to multiple workers.
2. The number of residents living on the premises (not just registered to the premises) far outweighs the capacity of the property.
3. Excessive use of rear entrances.
4. A house manager is often referred to as a 'lieutenant' who collects all the money.
5. Mattresses on the floor without bed frames.
6. Poor cleanliness of the property (i.e. insect or rodent infestations)
7. Up to four bank accounts registered to each worker.

Possible questions to be asked by officers during an inspection to support with identifying possible signs of modern slavery could include:

- Do you have your own key to the house? Can I see it?
- Do you have a comfortable sleeping arrangement?
- Can you please confirm the address of this house?
- Can you please confirm your work address?
- Is your accommodation provided by your employer?



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