

# Identification of Forced Labour in Car Washes



Unseen

Modern Slavery Helpline & Resource

Centre – Themed report November 201

#### Modern Slavery in Car Washes - A Report and a Guide to Reporting

This report provides an initial assessment of calls made into the UK-wide Modern Slavery Helpline and Resource Centre related to labour exploitation in car washes between **10 October 2016 and 31 August 2017**. The Helpline is operated by the modern slavery charity, Unseen.

The purpose of this report is to highlight the types of calls the Modern Slavery Helpline is receiving, and from whom, in relation to situations of potential labour exploitation involving car washes. This report also seeks to raise awareness of the indicators of modern slavery in the context of car washes and encourage members of the public to report any concerns they may have to the helpline.

#### In summary:

- During the period, the Helpline received 88 calls and 54 web reports relating to suspicious car washes, culminating in 112 modern slavery cases.
- From the 112 modern slavery cases in car washes, 692 potential victims were indicated, which equates to an average of 6.2 potential victims per case.
- Regarding the types of modern slavery indicated, 108 forced labour cases were recorded, and 4 human trafficking for non- sexual exploitation were recorded.
- Calls and webforms reported exploitation occurring in England (101 cases),
  Wales (7 cases), Scotland (2 cases), and Northern Ireland (1 case). The country of exploitation in one report was not provided.
- In only 2 cases did a victim or victims of modern slavery self-report their circumstances. Most cases – 75 out of 112 – arose from members of the public observing and reporting suspicious activity at car washes.
- In 45 out of 112 modern slavery cases recorded, the caller provided the nationality of the potential victim. 20% (23) of modern slavery cases were recorded as involving Romanian nationals. Other reoccurring potential victim nationalities include English, Albanian, Polish, and Bulgarian.
- Only 19 of 112 cases, or 17%, involved female potential victims.
- 10 cases, or 8.9%, involved minors. In all such cases, a referral was sent to the relevant local authority child safeguarding team or local law enforcement.
- Where reported and recorded, the most common age ranges for potential victims were 18-24 and 25-34.

#### **Introduction and Analysis of Key Findings**

The UK-wide Modern Slavery Helpline and Resource Centre provides support, advice, and guidance on any modern slavery-related issue to the public, potential victims, businesses, and statutory agencies. It does this 24 hours a day, 365 days a year.

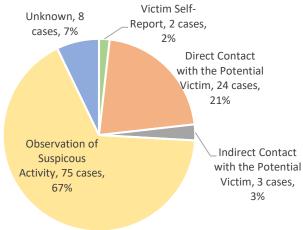
Since it began taking calls and receiving web reports in October 2016, the Helpline has received numerous contacts relating to modern slavery potentially taking place at car washes across the UK. Since the majority of these reports have come from members of the public having observed suspicious activity, it is clear that the public have a vital role to play in triggering a process that can ultimately lead to victims of modern slavery getting the help they need under the National Referral Mechanism and from the police.



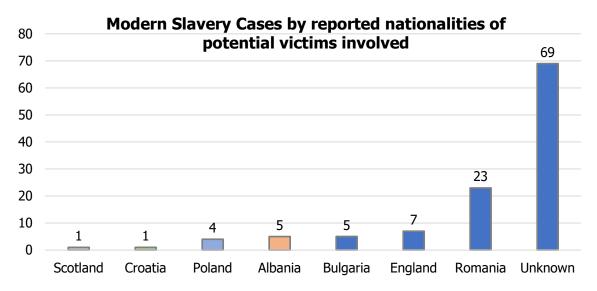
During the period 10 October 2016 to 31 August 2017, the Modern Slavery Helpline received **88** calls and **54** web forms regarding potential exploitation in car washes from the public and potential victims. These involved 36 different police force areas across the UK. The majority of calls received concerned cases in England.

Many of the calls received into the Helpline about car washes are from members of the public. Interestingly, only 1.8% of cases (2 cases) included calls from potential victims, themselves, reporting their own situation, which is a much smaller percentage than the 15% of calls received from potential victims in other types of modern slavery cases. This is shown in the helpline's <u>quarterly statistical reports</u> for January to June 2017. This may be because the individuals forced to work in car washes do not see themselves as victims, or there may be greater awareness of forced labour in car washes among members of the public because of recent radio and media campaigns and stories.

#### **Proximity of the Caller to the Situation**



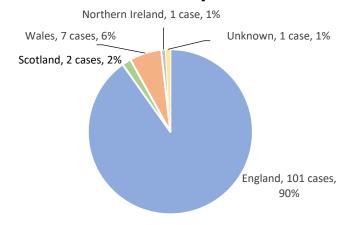
The calls and web reports to the Helpline during the relevant period confirmed what is often suspected about forced labour in car washes: most of the victims are, or are considered to be of Eastern European origin. The high number of 'unknown' nationalities in the table below reflects the understandable fact that members of the public cannot always be certain what a potential victim's nationality is. Where a caller assumes a potential victim's nationality the helpline adviser will record 'unknown'. Some cases involve potential victims of various nationalities.



There is a common misconception that modern slavery equates only to sexual exploitation of females. The reality is that labour exploitation is now emerging as much more widespread than previously thought, and the majority of victims of this type of exploitation are male. Out of 575 potential victims reported in 2017, 452 workers (79%) were male; 31 workers (5%) were reported as female. The gender of 92 potential victims was unknown.

Calls and web reports reporting concerns in car washes included locations in England (101 cases), Wales (7 cases), Scotland (2 cases), and Northern Ireland (1 case). In one case, the country of suspected exploitation within the UK was not reported to the Helpline. This could have been, for example, because the point of contact filled in a web report but did not include details of the location of the car wash, and did not provide contact details nor consent for the Helpline to establish contact. The Helpline will never contact anyone without their consent, and so it is vital – in all cases – that anyone reporting a suspicious situation provides the location of the suspected exploitation and any other relevant information to help inform the relevant agencies.

## Location of person reporting to the helpline by UK country

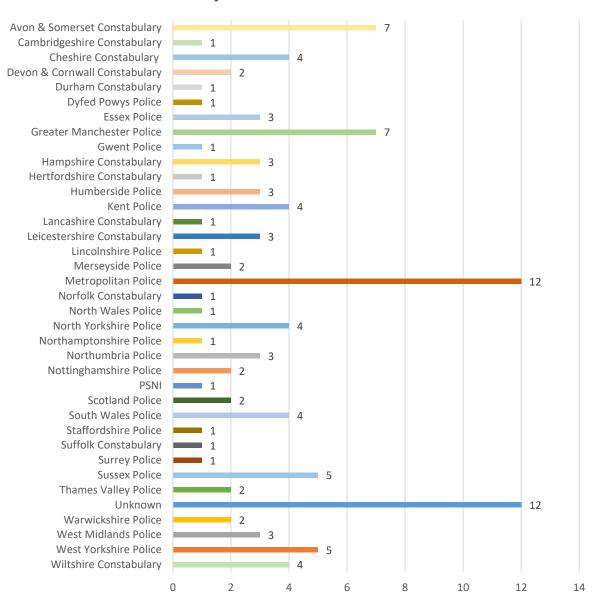


Within England, Wales, and Northern Ireland, exploitation was reported at car washes from a wide variety of locations. In 16 cases, exploitation was reported to be occurring

in London, 4 cases in Manchester, 4 cases in Bristol, 3 cases in Cardiff, 2 cases in Birmingham, 2 cases in Hull, 2 cases in Leicester, 2 cases in Huddersfield, and a range of other cities or towns with a single case reported. The data suggests that labour exploitation at car washes is geographically widespread, and not just limited to major cities.

The table below shows the location, by police force region, of exploitation at car washes, as reported by those contacting the Helpline.

# Location of Potential Exploitative Car Washes by Police Force Area



#### Modern Slavery, or Much Ado About Nothing?

Of 211 cases mentioning car washes, 112, or 53%, were identified by the Helpline, based on the best information available, as potential modern slavery situations. This means that at least one indicator of forced labour or human trafficking for labour exploitation was identified.

Where a report involving a car wash is made to the Helpline, the Helpline will endeavour to provide as much information as possible to the police or relevant law enforcement agency, when making a referral. Between October 2016 and August 2017, for modern slavery cases indicated to occur within car washes, the Helpline submitted a total of 99 law enforcement referrals, 7 local authority child safeguarding referrals, 2 referrals to the Gangmasters and Labour Abuse Authority, and 2 referrals to NGOs for the NRM. In addition, 3 referrals were made to the GLAA for potential situations of labour abuse or situations that are considered not to meet the threshold of modern slavery that occurred in car washes.

In circumstances where an adult potential victim does not want a referral to be made, or a caller with direct contact with an adult potential victim reports that the person concerned does not want a referral to be made, the Helpline will not make a referral. This 'consent rule' does not apply to situations involving minors – where a referral will be sent regardless of consent to safeguard any children involved.

#### **Spotting the Signs - Indicators of Modern Slavery at Car Washes**

Since the majority of car wash cases that were reported to the Helpline were reported by 'observers of suspicious activity' (i.e. members of the public providing a tip-off), the public clearly have a vital role to play in helping identify potential victims of modern slavery. To report a suspicion of forced labour to the Helpline, the public need to have a better understanding of the indicators of forced labour and what instances of modern slavery at car washes might look and feel like.

The table below sets out eleven common indicators that suggest that forced labour may be taking place at a car wash, and what to look out for:

Indicator	What to look out for
The workers do not have proper equipment for the job.	Look out especially for workers not wearing protective gloves, waterproof boots, or goggles.
2. The cost of a wash seems excessively low.	How many workers are washing the car? How much are they being paid for the wash? Even assuming that the money is being fairly distributed amongst the workers (and not pocketed by an exploiter), how many cars an hour/day would the workers have to

wash in order to be making the minimum wage?

3. The car wash has recently 'popped up', and may soon close down or move to another location.

A car wash suddenly appearing from nowhere, and vanishing just as quickly, could indicate that an exploiter is maximising an opportunity to make a quick profit. By frequently moving their victims, exploiters are able to keep them isolated and under control.

4. The workers live on, or very close to, the car wash site.

Exploiters often provide their victims with low-quality accommodation, yet force them to pay rent for it. Look out for makeshift accommodation being set up on-site.

5. At the start of their shift, the workers get dropped off in a group at the car wash site, and at the end of their shift they get picked up in a group from the car wash site.

Not all victims of labour exploitation in car washes live on-site. Look out for groups of workers being dropped off and picked up at the start and end of their shifts. The exploiter could be providing low-quality accommodation elsewhere.

6. The workers work excessively long hours.

Is the car wash open long hours? Do the workers seem to work long hours, without sufficient breaks? Look out for workers working excessively long hours – this could well be a sign that they are being exploited. Also, look out for sites that have no break room. For example, in one case that was reported to the Helpline, the victims took their break in a makeshift shed whilst sitting on cardboard boxes.

7. The workers are of Eastern European origin. Many Romanians, in particular, are exploited at car washes.

It is true that many Eastern Europeans come to the UK to work in car washes. But do not assume that if the workers are not Eastern European things must be fine – still, keep an eye out for all the other indicators.

8. The car wash only accepts cash.

This could be a sign that the money is going straight into the pocket of an exploiter. Beware of cash-only car washes.

9. The car wash operates a 'pay the manager only' system.

Again, this could be a sign that the money is going straight into the pocket of an exploiter. The workers may not be seeing a penny of customers' money. Look out for car washes where only the manager collects payments. Some Helpline cases include reports that the worker was not allowed to receive or keep tips.

10. Presence of an intimidating 'manager'.

Are there one or more individuals who seem to be controlling things? Do they appear to be monitoring the workers, and intimidating them? Do the workers appear to fear their manager? Are they unable to converse freely customers? Even if no visible physical abuse is taking place, the presence of such an individual, or individuals, could be a sign that the workers at that car being controlled wash are exploited. Keep an eye out for intimidating managers.

11. The workers display concerning body language.

Victims of modern slavery undergo tremendous emotional turmoil, and this very often manifests on the outside. Look out for body language that suggest that the workers are fearful, withdrawn, intimidated, or subdued.

All of the above indicators are potential signs that something may not be right, but it may be the case that only one of them is observable at a given point in time, or at a particular car wash. However, one indicator is enough to justify a call or a web report to the Helpline, as the others may be present but not immediately evident.

The calls and web reports to the Helpline during the relevant period suggest that the most common indicators of forced labour observed by members of the public are:

- inadequate equipment for the job
- transportation to and from work
- cash only car washes
- 'pay the manager only' car washes

#### The Role of the Public – Gathering and Reporting Key Situational Information

When, based on an observation of *one or more* of the above indicators (or anything else that raises suspicions), a member of the public suspects that forced labour may

be taking place at a car wash, he or she needs to gather as much information as possible about the situation, location and the individuals involved but without putting themselves at risk. The next step is to call the Helpline on 08000 121 700 or fill in an online report at: <a href="https://www.modernslaveryhelpline.org/report">www.modernslaveryhelpline.org/report</a>.

### Key situational information to gather once a suspicious car wash has been identified through the observation of one or more indicators of modern slavery:

- The name of the car wash.
- The location of the car wash as exactly as possible.
- The opening hours, and when the car wash first appeared.
- As much demographic information on the potential victims and potential exploiters as possible (names if known ages, genders, nationalities, physical descriptions).
- The number of potential victims witnessed.
- Whether minors are involved.

#### Other key questions that may be relevant:

- What indicators of forced labour have you seen?
- What concerned you enough to contact the helpline or submit a web report?
- When did you see the concerning situation or exploitation?
- If you saw people being transported, do you know the make, model and registration number of the vehicle used?
- How many cars are typically being washed at any given time? (This will help in assessing whether the workers may be being paid less than the minimum wage.)
- How is the potential exploiter keeping control of the potential victims? Is there intimidation on display? Is there physical or verbal abuse going on? Are the workers being threatened in any way? Take note of the body language of the workers do they appear subdued and fearful?
- Who else knows about the situation?
- Are you putting yourself at risk by reporting what you have seen?
- What do you feel needs to be done about the situation?
- Is there anything else of importance that you can think of?

Remember, the more key situational information gathered, the stronger the referral the Helpline can submit to the relevant body (e.g. law enforcement), which in turns means the greater the likelihood that the relevant body will be able to intervene to help any potential victims.

#### Conclusion

Although the Helpline has been contacted about a number of car washes across the UK, it is important to remember that many car washes are completely legitimate. However, if something does not seem right, it could be an exploitative situation. Contacting the helpline about a concerning or suspicious situation can be done in confidence, and the helpline will treat any report made with sensitivity. If you do suspect that either yourself or someone else may be a victim of forced labour, report it to the Modern Slavery Helpline on 08000 121 700 or online at:

#### Case Study - Tip off involving a suspicious car wash in Wales

A caller to the Helpline witnessed the following at a car wash: six men, all of whom were foreign nationals and none of whom spoke English, were working at a car wash in Wales.

The caller successfully identified the presence of the following indicators of forced labour exploitation:

- The men appeared fearful and withdrawn
- The men would not handle money only one assertive, dominant individual would do so (the 'intimidating manager')
- The men wore no protective clothing

Having recognised these key indicators of modern slavery, the caller took note of enough vital situational information (location of the car wash, victim demographics) to enable the Helpline to draft a law enforcement referral for the police to investigate the situation.

This is an example of a very useful tip-off. The caller identified the indicators of modern slavery, gathered key situational information, and reported the case to the Helpline. Callers reporting situations such as these are really making a difference in the fight to end modern slavery.