# Workshop on Aviation and Hospitality's Response to Combatting Modern Slavery

Wednesday 18 April 2018 Principality Stadium – Cardiff, Wales









#### **Welcome and opening Address**



Stephen Chapman , Anti-Slavery Co-ordinator, Welsh Government welcomed everyone to the event and stated the 'Workshop on Aviation and Hospitality's Response to Combatting Modern Slavery' had been jointly organised between the UK Modern Slavery Training Delivery Group and International Air Transport Association (IATA). This event was the first of its type to be held in the UK.

Delegates were informed that Modern Slavery and human trafficking is a complex crime that takes a number of different forms often across international boundaries. It is difficult to identify, complex to investigate and complex to prosecute. Modern slavery is the second most profitable crime to drugs crime and we know it often involves organised crime groups and with many new trends emerging.

The event provided the opportunity to highlight work being undertaken and to consider what more could be done to eliminate this heinous crime which is affecting millions of children, women and men worldwide and thousands here in the UK.

#### Kim Ann Williamson, Chair UK Modern Slavery Training Delivery Group

Kim-Ann Williamson covered the role of the Crown Prosecution Service (CPS) in tackling Modern Slavery in the aviation and hospitality sector. Part of Kim-Ann's role is to raise awareness of Modern Slavery and to highlight the Crown Prosecution Service's Prosecutor Commitments to Modern Slavery. There exists the need to raise this awareness of modern slavery at a public, statutory and non-statutory level.

In 2014 the UK Home Office Chief Scientific Officer estimated number of people in the UK being exploited was 10,000 to 13,000. However, last year the National Crime Agency (NCA) estimated the number of people in the UK being exploited may be over 100,000. One of the major challenges in the fight against modern slavery and human trafficking can only be achieved by organisations working collaboratively. This event reinforced the need for partnership working by bringing organisations together from Aviation, Hospitality, Law Enforcement and Prosecution backgrounds.



The rise in referrals to the National Referral Mechanism (NRM) for the UK is partly due to better understanding the signs to look out for and improved reporting of incidents. In Wales alone, 4

years ago it was recorded there were 34 NRM referrals, whilst last year there were 193. Kim-Ann noted that there is different terminology used for slavery - *trafficking of human beings, trafficking in persons, modern slavery, human trafficking, Anti-Slavery.* The conference attempts to bring together all of these terminologies used globally – it is in its simplest form: the exploitation of human beings.

Kim-Ann stated there is a need for a multi- agency approach and a public commitment to look out for the signs of Modern Slavery and act appropriately. On the Modern Slavery agenda in the UK, law enforcement has rolled out 'in-house' training for staff at all levels across the country, as have Crown Prosecution Service, and some parts of the aviation and hospitality sectors. One of the issues that Kim-Ann outlined was that the Captain of an aircraft needs a robust and trusted reporting structure once they have been advised of a suspected human trafficking incident on board. Discussion around this issue with Unseen and UK Border Force has led to the creation of a referral pathway.

There is a need to consider that airports are an excellent location for traffickers where they can ensure that the movement of their victims is limited. In the same way, it is also the perfect place for cabin crew to spot victims. The hospitality sector also has important work to do as the victims may continue their journey in a hotel. Kim-Ann reiterated the important work of the British Hospitality Association in the UK, Shiva Hotels and Brooks University's hospitality training materials. It is important to note that the hospitality and tourism industry is the fourth largest industry in the UK and employs more than 4.6 million people.

Another way that this issue is being tackled is by considering supply chains. The Welsh Government's 'Ethical Employment in Supply Chains - Code of Practice', came about as a result of the Modern Slavery Act 2015 and works to eradicate Modern Slavery and unethical employment practices for all sectors in Wales. The Modern Slavery Act 2015 is seen to be groundbreaking legislation in tackling Modern Slavery and is attracting global interest including Australia and New Zealand, who are in the process of introducing such legislation.

#### **Jeff Cuthbert, Police and Crime Commissioner for Gwent**



Jeff Cuthbert expressed his appreciativeness of being able to address the audience and stated both the aviation and hospitality sectors had an integral role to play in combatting Modern Slavery in the UK and globally.

As the lead Police and Crime Commissioner for Wales, Jeff also stated he was a member of the National Anti-Trafficking and Modern Slavery Network (NATMSN) and he would be reporting back to the Network on this event and the work being taken forward in these sectors.

Jeff spoke about the need to work to work together as no single organisation can effectively tackle and eradicate this problem alone. Only through effective collaboration with partners across all sectors can we come up with solutions. He shared that Gwent Police had recently introduced a dedicated Modern Slavery team in Gwent Police to work with multi-agency organisations and prioritise the issue of slavery.

#### Tim Colehan, Assistant Director External Affairs, IATA

Tim stated that the number of people in slavery each year is 25 million which is equivalent to the population of Australia. He outlined that the airline and hospitality industry have a moral obligation to consider the part they should play to tackling this crime. This is on top of the security and regulatory considerations as well as the expectations that consumers and investors have. Tim flagged



up the important concern of the link between trafficking and terrorism. According to the Henry Jackson Society Report, Modern Slavery contributes 10-30 million US dollars to the Islamic State. Regulations for those in the aviation sector already exist, alongside wider legislation such as the Modern Slavery Act 2015. The UK Modern Slavery legislation alone, affects over 80 airlines. Trafficking is a priority under the UN Sustainable Development Goals 2015.

He continued by stating that that "there is a clear need for sectoral support to help companies to effectively contribute to the fight against human trafficking, while at the same time mitigating the legal, investor relations and reputational risks that they will increasingly face". IATA is doing pivotal work to tackle the issue. At the conference, they demonstrated their awareness raising video that targets airline management and staff. This highlights some of the typical ways in which traffickers can misuse aviation to transport victims. It shows that if staff are trained, they can assist government agencies and law enforcement with intelligence about suspected human trafficking.



#### The regulatory environment

The Regulatory Environment – UK Modern Slavery Act 2015 – what is it, what are the requirements on transparency in Supply Chains and how to ensure ongoing compliance.

## Justine Currell, Executive Director at Unseen UK and Deputy Police and Crime Commissioner, Bedfordshire



As Executive Director of Unseen, Justine outlined the three key ways that the organisation works to tackle Modern Slavery. Unseen supports victims and potential victims of Modern Slavery, provides training and awareness to external stakeholders, and influences systemic changes by working with UK Governments. Justine reiterated the importance of section 54 of the Modern Slavery Act 2015 and the need for businesses to ensure that their supply chains are transparent.

There is a legal duty for organisations over 36million to publish a Modern Slavery statement. Justine also highlighted the power of the Welsh Government's Code of Practice which tackles Modern Slavery, unfair employment practices and encourages organisations to pay the Living Wage. The Code suggests using TISCReport, which was developed by Unseen, to upload Modern Slavery statements and track supply chains. A central message from Justine's speech was for all organisations to be proactive and committed to tackling slavery. Justine's final messages were that awareness raising is vital, funding and resource are limited so we must use them carefully and that collaboration is kev. **Justine reminded everyone of the Modern Slavery Helpline number:** https://www.modernslaveryhelpline.org/



#### **Andrew Desmond, Gangmasters and Labour Abuse Authority (GLAA)**

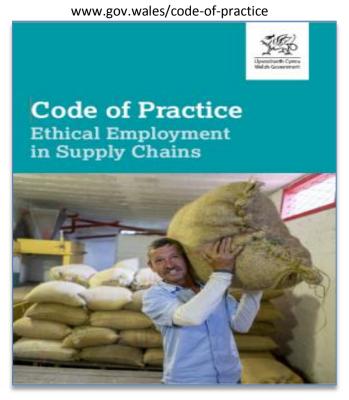
Andy Desmond, speaking on the issue of exploitation in supply chains, the main areas that Andy flagged up as areas of risk which the GLAA deal with are agriculture, food packing & processing, cleaning, catering, construction, car wash, care homes, charity bags, leaflet drops, warehousing, hospitality industry.



Andy outlined the extent of the risk being;

- Low paid –low skilled –high demand –temporary workers in a £100+ billion business
- 1.6 million Total temporary workers in the UK
- These workers are also at risk of multiple exploitation.
- 2.5 million people on minimum wage

Andy shared GLAA experience of labour abuse in the hotel industry and concluded that the way forward is to build greater awareness of Modern Slavery and to ensure that those in the industry know how to spot the signs of Modern Slavery but also what they can do within their own organisation.



# <u>Panel Session - Modern slavery and law enforcement - what are the key challenges and where can aviation and hospitality assist?</u>



- What are the key challenges for law enforcement in preventing and prosecuting human trafficking cases?
- How can airlines and aviation companies assist law enforcement?
- What should aviation staff do if they have suspicions about human trafficking situations?
- What are the protocols in the UK for reporting suspicions of human trafficking and how are these used by law enforcement?
- What evidence is there that reporting of suspicions can assist in the fight against human trafficking?

#### **Moderator:**

Tim Colehan, Assistant Director, External Affairs, IATA

#### Panelists:

- Rachelle Freeguard, UK Border Force
- Justine Currell, Executive Director at Unseen UK and Deputy Police and Crime Commissioner Bedfordshire (Modern Slavery Helpline)
- Bharti Patel, Chief Executive Officer, ECPAT UK
- Jonathon Counsell, Group Head of Sustainability, International Airlines Group (Aer Lingus, British Airways, Iberia and Vueling)
- Tracy Israel, Head of Learning & Development, Celtic Manor Resort

#### Summary and action points raised from this panel discussion

- <u>Training & awareness</u> consistency & co-ordination of training provision focus on a victim-led approach bespoke training inputs for different groups pertinent & relevant case studies ensure ALL staff receive training (e.g. check-in personnel)
- <u>Reporting protocols</u> Border Force/Unseen flowchart document importance of involvement of Modern Slavery Helpline in all reporting to ensure the capture of intelligence – development of an App for reporting purposes (technological solutions) – more reporting of concerns
- A <u>commitment</u> to challenge Modern Slavery throughout the organization with Executive level support
- An understanding of each agency's <u>roles & responsibilities</u> balance industry priorities with statutory sector responsibilities
- Consideration of a <u>Memorandum of Understanding</u> between industry bodies and statutory sector
- Construction and implementation of Anti-Slavery policies and procedures
- Appointment of <u>Modern Slavery ambassadors</u>

#### The National Crime Agency response to combatting Modern Slavery

# Steve Wilday, Head of Modern Slavery and Human Trafficking Unit, National Crime Agency



Steve Wilday gave a comprehensive presentation on the role of the National Crime Agency this included the operational response to tackling slavery and a number of awareness raising campaigns which had been carried out. A recent example is the 'Invisible People' campaign which visually highlighted how victims of slavery are hidden in plain sight. This campaign had been held in major cities and locations across the UK.

It was emphasized that through awareness raising and training more people are recognising the signs of slavery and this is resulting in more victims being identified and their perpetrators being brought to justice. In 2012 1,186 victims were referred into the National Reporting Mechanism and this number had risen in 2017 to 5,148.

# <u>Panel session - How should aviation and hospitality respond to Modern Slavery?</u>



- What can stakeholders do to ensure they are equipped to make a real difference in the fight against Modern Slavery?
- The need for Executive Management leadership and support
- The need for a multi-stakeholder approach involving customer facing staff
- Practical steps required

#### **Moderator:**

Kim Ann Williamson, Chair, UK Modern Slavery Delivery Group and Crown Prosecution Service, Cymru Wales

#### Panelists:

- Emily Kenway, Office of the UK Independent Anti-Slavery
  Commissioner
- Steve Corcoran, Detective Chief Superintendent Gwent Police
- Barry Hughes, Chief Crown Prosecutor, Crown Prosecution Service, Cymru Wales
- Martin Drake, Chairman of the BALPA Security Committee. British Airline Pilots Association
- Brian Hansford, Chief, Advocacy Section, United Nations
- Office on Drugs and Crime (UNODC)

#### Summary and action Points raised from this panel discussion

- Raising awareness of front-line staff an ability to spot the signs
- <u>Reporting of concerns</u> importance of 'golden hour' principles prioritization of safeguarding of potential victims
- An understanding of the <u>scale of the problem</u> all displaced people are vulnerable to exploitation – a greater commitment from UN member states: only 30 out of 193 have pledged to end slavery
- <u>Civil society buy-in</u> to tackle Modern Slavery
- Greater use and <u>understanding of technological fixes</u> (e.g. reporting protocol is good but mobile phones do not work above 3k feet and not all aircraft have satellite communications)



- More <u>education of ALL airline staff</u> (utilization of General Security Aviation Training (GSAT) – National Air Traffic Control Services (NATS) to be involved. Air Traffic Control in many countries would not know what to do in such circumstances.
- Greater use of <u>Anti-Slavery Commissioner's office</u> encourage HMG to enforce regulations – highlight reputational risk to businesses (litigation & shareholders) promote good practice/good business sense – provide assistance via Trade Associations
- Replicate what the Shiva Foundation has done for hotels with similar <u>guidance</u> produced for aviation
- Sector-specific approaches (one size does not fit all)
- Modern Slavery Act (2015) legislation needs to be enforced (S54 requirement has no penalty in cases of non-compliance

## Case Study: How a global airline is responding to Human Trafficking

#### Brian Kinane, Security Training Manager, Emirates Airline

Brian demonstrated the Emirates Airline training video which is rolled out to Emirates staff, and highlighted the work that is being done to tackle this issue such as the partnership between the UK and Emirates Security Group.

In his presentation Brian stated that the international Emirates Airline alone has 200,000 seats on its flight leaving Dubai everyday. This demonstrates the available opportunities open to traffickers to use such journeys and also the opportunity for airline staff to spot signs slavery and where necessary intervene.



Brian made it clear in his presentation the commitment that Emirates Airline is taking to combat Modern Slavery and human trafficking and the willingness to work with partners globally to make this happen.

### Case study: How the hospitality industry is responding to Modern Slavery



## Maureen Brooks and Alexandros Paraskevas, COMBAT Toolkit, Oxford Brookes University

In their presentation they Maureen and Alexandros outlined that the estimates for modern slavery in the European hospitality industry come to an estimated total of 115,140.

They shared details of the Combat Toolkit for the hotel sector which can be found here:

https://www.brookes.ac.uk/microsites/combat-human-trafficking/the-toolkit/

## Successful multi-agency approaches to Modern Slavery at airports



Rachelle Freeguard, Senior Officer, Gatwick Safeguard and Modern Slavery Team, UK Border Force

Rachelle spoke on the need for joined up working at airports to ensure victims and perpetrators are identified and dealt with accordingly. UK Border Force is a professional law enforcement command within the Home Office, responsible for securing the UK border and controlling migration at maritime ports and airports across the UK and overseas. Rachelle reminded the audience that UK Border Force has an obligation to protect the vulnerable;

- Victims of modern slavery
- Children
- Vulnerable adults

Rachelle reminded the audience that it is estimated that 45.8 million people are in slavery globally and the global trade in humans is worth \$150 billion (ILO, 2016). In 2016, there were potential victims in the UK from 108 countries of origin, the UK being the 3<sup>rd</sup> most common country of origin.

#### The Way Forward and Next Steps



Kim Ann Williamson, Chair, UK Modern Slavery Delivery Group and Crown Prosecution Service

#### Tim Colehan, Assistant Director External Affairs, IATA

The way forward and next steps outlined the requirement to develop a UK Aviation and Hospitality sector Group on Modern Slavery and Human Trafficking which will facilitate the sharing of best practice.

This will also include the implementation of guidance and awareness materials including the hotel and aviation booklets developed by the UK Modern Slavery Training Delivery group.

#### Wrap up and Close





Stephen Chapman thanked Kim-Ann Williamson and Tim Colehan for organizing and cohosting the event. Also for IATA for making the event possible by providing funding. He also thanked all of the guest speakers and the audience for their attendance at the workshop, particularly colleagues who had travelled from overseas.

Being the first event of this type to bring the aviation and hotelier sector together, Stephen Chapman stated he hoped that all those attending had managed to learn from the presentations and also to benefit from the networking opportunity of meeting colleagues who share the same vision.

#### In summary the workshop provided the following key recommendations:

- All organisations should commit to raising awareness of Modern Slavery and human trafficking by training relevant operational staff to identify the signs and make sure incidents are reported correctly.
- Encourage the UK aviation and hospitality sectors to commit to tackling issues of exploitation in the supply chain. One of the ways this can be achieved is through signing up to the <u>Welsh</u> <u>Government's Ethical Employment in Supply Chains - Code of Practice</u> and signing up to <u>TISCreport</u>.
- Explore the tools and resources required to better support this work
- Pilot and review the Aviation Response to Modern Slavery Flowchart
- Identify good practice and ways to improve collaborative working
- Understand that no organisation in isolation can combat Modern Slavery. This can only be achieved by working together in partnership.

#### Quotes from the day

"Airlines are committed to support governments and law enforcement agencies as they tackle this crime. The International Air Transport Association was delighted to co-host this unique event in Cardiff which brought together government agencies, law enforcement, NGOs and the UK airline industry to promote understanding, share best practices and to identify specific actions that will mean that we can all be more effective in responding to human trafficking."

#### - Tim Colehan, IATA

'I was very pleased to be part of the Wales Aviation and Hospitality conference. The attendees were very engaged and well run sessions allowed for great interaction and questions, highlighting the sectors commitment to tackling modern slavery. These types of events ensure collaboration and demonstrate how working effectively with partners to find practical solutions can have a very positive impact on those vulnerable people we are seeking support and protect.'

- Justine Currell, FRSA Executive Director, Unseen

'I found the whole event refreshing, particularly with a diverse audience different to the normal criminal justice community normally engaged in this subject matter. Being able to discuss the slavery agenda with a different perspective and focus was beneficial. The quality of subject experts was evident throughout the day and I left feeling encouraged that the issue of Modern Slavery had been thoroughly examined from the viewpoint of prevention and victim focus. I am positive the day will bring real change for victims.'

- Steve Corcoran, Detective Chief Superintendent, Gwent Police

'It was a huge honour to be invited to contribute to such a prestigious event. The audience reflected both the level of interest across the law enforcement, NGO and Third & Business Sectors, in what is without doubt one of the biggest challenges currently facing our Communities both in the UK and Internationally. The NCA will continue to lead the fight in tackling MSHT but the Event highlights both the scope of the challenge facing us and the need to continue to work collaboratively to protect the most vulnerable in our communities. For me, the Event demonstrated the energy and commitment of those individuals and groups who are at the heart of this challenge. It was thought provoking but also offered real tangible steps which could and should be taken by those in key business sectors, charitable groups and law enforcement in making a difference. It also highlighted the leadership demonstrated at a high and consistent level by the organisers within the Wales Anti-Slavery Group.'

- Steve Wilday, Head Of Unit, Modern Slavery and Human Trafficking, Vulnerability Command, National Crime Agency

'we will be adding the IATA video on Modern slavery into our training' workshops'

- Edinburgh Airport

'Thank you for a great conference KimAnn - my team and I found it extremely helpful, positive, insightful and thought-provoking. It was so beneficial to be able to hear from key individuals who shared their experience with everyone - especially as those of us who strive to increase awareness through training need case studies, statistics and 'best practice' advice to ensure our programmes engage others. We networked widely and have gained invaluable help and support from field experts. Looking forward to the next one!'

- Tracy Israel, Head of Learning and Development, Celtic Manor Collection

'The conference demonstrated the seriousness with which the aviation and hospitality industries take the issue of people trafficking and modern slavery. There was no doubt that the representatives present intend to spread the message of vigilance against the abuse of vulnerable people, and support for those identified as being trafficked and enslaved. I was delighted to be part of this event and I look forward to other industries following this lead.'

- Jeff Cuthbert BSc MCIPD, Police and Crime Commissioner for Gwent

'Many thanks for the invite to UNODC to participate in the panel discussion and the workshop overall. Very informative and glad to hear there was such a positive response from delegates. Well done to you and team for such a well organized event on such a crucial topic. Look forward to working together in the future.

- Brian Hansford. United Nations Office on Drugs and Crime

'By its very nature, the tourism industry is vulnerable to unscrupulous human traffickers who will always seek paths of least resistance in order to make money. Together, all tourism stakeholders from destination management organisations and travel agents, to airlines, airports and hotels we can eradicate this heinous crime from our sector. We can learn from each other, share good practices, communicate and co-ordinate our efforts. This conference organised by CPS-Wales is unique in that it brought together the Aviation and Hospitality industry with law enforcement, NGOs and academia and built the right bridges for this battle. We had the chance to present the COMBAT toolkit which, although designed for the hotel sector, it can be used as a guiding tool for other tourism stakeholders not only to raise awareness of human trafficking in their ranks but to develop policies and standards to combat it, taking always a victim-centred approach and effectively working with law enforcement.'

- Alexandros Paraskevas (PhD), Professor of Strategic Risk Management, Chair in Hospitality Management, International Centre for Hotel and Resort Management, University of West London

'This important International Workshop was a first for the UK by bringing together strategic partners from the Aviation and Hospitality Sectors with Government Departments, Criminal Justice, Law Enforcement and Civil Society representatives to explore ways of working together in the future to tackle slavery.'

- Stephen Chapman, Anti-Slavery Co-ordinator, Welsh Government

#### **Acknowledgements**

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Sue Moffatt: Commercial Director, Welsh Government & Director - National Procurement Service

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Sarah-Jane Prew: Aviation Security Specialist

Jeff Norman: Stop Slavery Today

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Stop Slavery Today, Green Light Ltd.

Cardiff Principality Stadium

Please find below the link to the IATA website for details of the workshop and to access the presentations of the guest speakers:

http://www.iata.org/events/Pages/combatting-modern-slavery.aspx

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Say no to Slavery in the UK

If you see it, report it!

In an emergency: 999

Routine: 101

Modern Slavery Helpline: 08000 121 700