**Version 2**

**HUMAN TRAFICKING**

**AND**

**MIGRANT WORKER**

**TOOLKIT**

**A GUIDE FOR**

**EMPLOYERS**

Produced by The Association of Licensed Adult Entertainment Venues Scotland

Human Trafficking, also known as modern slavery, is a major problem in the UK, as it is throughout the world. Everyone has a responsibility to be aware about human trafficking and to ensure, where possible, victim identification and prevention of human trafficking and to work with agencies to combat the trafficking of individuals and families. This is particularly true of employers and their organisations.

The Licensed Adult Entertainment industry has often been accused, unfairly, of being complicit in the employment of individuals who have been trafficked. This is in spite of a complete lack of evidence to support such allegations. The Association of Licensed Adult Entertainment Venues Scotland takes it’s responsibilities as an employer very seriously. It is particularly scrupulous when carrying out checks on potential employees to ensure that their immigration status is in order and that they have not been the victims of human trafficking.

This toolkit has been produced to ensure that the Association and it’s members actively identify potential victims of human trafficking in their recruitment procedures. It is also used to thoroughly examine any applicants’ immigration status when they apply for employment in all of our venues.

In producing the toolkit, the Association has taken advice from a number of experts in the field of human trafficking as well as sourcing reference material from a wide variety of agencies and bodies active in this area.

**HUMAN TRAFFICKING**

The Association has adopted a number of key areas of competence for it’s members in responding to the crime of human trafficking:

Victim identification – human resources and other key staff need to be able to recognise the signs that someone may be a victim of trafficking;

Victim support – employees will need to attend to the immediate physical needs of victims and know who to contact to refer the victim for support;

Working in partnership – the Association’s members will need to cooperate with other agencies such as Third Sector and Community Organisations, the police and immigration services, as well as other levels of government;

Awareness raising – Employers and their organisations have a vital role to play in raising awareness of the issues locally. The Blue Blindfold Campaign has provided posters displayed in pubs and clubs, there has been an online advertising campaign and, more recently, television advertising. The Blue Blindfold Campaign website also sets out some of the signs of trafficking.

Staff need to maintain an active awareness of the vulnerability of any individual suspected of being trafficked and be aware of their mental, emotional and psychological state when conversing with the individual and to use non-threatening body language.

Staff should work hard to establish a rapport with potential victims, making them feel comfortable and at ease. It is not uncommon for victims to feel both relief at having been identified and yet fear and suspicion toward an identifying member of staff. This is often linked to their fear of being returned to their trafficking situation. It is also not uncommon for negative feelings, such as fear and suspicion, to give way to those of relief once the victim felt safe and came to trust the identifying member of staff.

Victims of trafficking may be reluctant to go into much detail about the full facts of their case. This may be because of cultural barriers, or simply due to the traumatic or humiliating nature of the treatment they have suffered. If this appears to be the case, staff should phrase their questions carefully and sympathetically.

The central point of contact for anyone encountering a suspected victim of trafficking is the UK Human Trafficking Centre (UKHTC). The UKHTC is part of the Organised Crime Command within the National Crime Agency (NCA). This hosts the designated Competent Authority for the identification of victims, and is a multi-agency organisation staffed by former police officers and civilian employees of the NCA.

If the issue of trafficking is raised as part of an asylum claim or part of the immigration process, there is a separate but linked Competent Authority, which is situated within the UK Border Force.

**MIGRANT WORKERS**

**EMPLOYMENT PROCEDURE**

There are multiple means of application for employment in our clubs;

* Website Job Applicants
* Telephone Applicants
* Walk-in Applicants
* Agency Applicants

From engagement, the prospective employee must fill out a two page application form and this requires to a government issued holographic photographic identification to be appended to it. This is verified by two senior members of management and attached to their application form and filed in the appropriate folder. All applicants must have a verified address which is checked by two senior members of management.

Telephone applicants will be asked if they are coming via an agent and if so a member of senior management will ask whom the agent is. A member of senior management will then check if anyone in the Association has worked with them before. If no one has previously worked with the agent or the management have no knowledge of this agent, an in-depth investigation would be carried out to ensure their accreditation i.e. check for a website, telephone correspondence, correspond with the new agent via e-mail to ensure the legitimacy of the agent. A very strenuous vetting procedure is adopted.

**INTERVIEW PROCEDURE**

Our employment procedure, which is a two part interview system, alerts us to anyone who may appear to be under any kind of duress.

All applicants, regardless of how the application was submitted, require to attend our training event held on Friday evenings. At this point a senior member of management will go through all requirements in detail. They will check and verify all documentation and identification submitted. Once the legitimacy of all documents has been approved training will commence. If the application is successful they will return the following day for the second part of the process. On engagement on their second day, a senior member of management will have a one to one conversation on why they applied for the job, how they found out about the job and how they feel about the job. This gives us the opportunity to make sure they are under no duress. They will then be required to do a three minute audition. If successful they will be shown a contract and if they agree the contract they will be offered a seven day trial period. This allows us to ensure they meet the requirements of the club management and to see if they enjoy the position applied for.

Before they start their employment they are introduced to their “buddy”, someone who is one of our experienced dancers. This “buddy” will submit a verbal report each evening on the wellbeing and progress of the new employee. As well as our continued observations this gives us the opportunity to make sure the employee is not under any duress.

Nightly briefings are held to ensure all members of staff are aware of any events and changes that are taking place within the establishment. Staff also have the opportunity to voice any problems they may be facing, or ask any questions they may wish to be answered. This also gives us the opportunity to see if anyone is under any type of stress or duress.