

Economic Development, Transport and Climate Emergency Commission

Evidence from Highfields Centre: Worker Exploitation Scrutiny

Introduction

We are pleased to present the following evidence to the Worker Exploitation Scrutiny sharing insights, experience and intelligence we have gathered, informed by our direct contact with over 1579 garment workers in the city summarised in this report. We have helped 579 clients with over 1300 cases related to housing, social welfare, and employment rights.

Background and Context

While the issues have been known for some time, the widespread media coverage of the less salubrious aspects of the garment industry had given rise in 2020 to a very wide range of agencies (including brands, unions, NGO's, regulatory bodies, community groups and local councils) forming the Apparel and General Merchandising Public/Private Protocol (AGM-PPP) to provide an effective platform for multi-stakeholder collaboration and for a coordinated approach to achieving improvements in working conditions in these UK supply chains.

Highfields Centre (HC) provided the base for the outreach workers, as it is in the heart of Leicester's garment factory area and has already well-established links with the community. The HC motto is 'Enhancing Lives, Empowering Communities & Enterprise for All' and it has played a leading role in supporting many major developments in the Greater Highfields area over the last 40 years.

FAB-L (Fashion-workers Advice Bureau – Leicester) is a community led project that initially employed two outreach community workers who were able to connect and build trust with garment workers and a wide range of agencies (including community groups, brands and unions) to provide support, advice, information, and assistance to garment workers, and build a vibrant and supportive community hub. Its mission is achieved by

- Preventing the exploitation of workers
- Raising awareness to prevent the exploitation of workers
- Protecting vulnerable and exploited workers
- Contributing to disrupting exploitative practices
- Protecting the rights of all workers and promoting decent work, ensuring the inclusion of worker and community voice
- Providing evidence-based guidance and input to business, local and national stakeholders that support the vision of a thriving garment industry in Leicester

Overview of Fashion Advice Bureau - Leicester (FAB-L)

The Fashion-workers Advice Bureau – Leicester (FAB-L) was established in November 2021 and commenced its services in January 2022 to focus on a specific type of exploitation e.g. wage theft, forced labour, human trafficking, health and safety violations, minimum wages.

Since its start in 2021, FAB-L has been a voice for garment workers. Over the last three years, we have stood by workers facing wage theft, exploitation, and unfair dismissals. Despite all the hurdles, we remain resilient, committed, and determined to make sure these workers are heard and that their rights are protected.

Highfields Centre also offers language and integration activities to FAB-L clients:

- We have expanded **ESOL and English classes** to help workers and their families integrate into the workforce and society.
- Created an environment for **Safe Reporting**: Maintaining the Fashion Workers Club as a confidential and safe space for workers to report exploitation and slavery concerns without fear.
- Offer **Welfare & Benefits advice and guidance**, particularly for those facing unfair dismissal or factory closures.
- Assisting workers with **Employment Support** in finding jobs—whether it is in the garment industry or another sector—to help alleviate poverty.
- **Advocacy**: Pushing hard for better working conditions for garment workers and encouraging brands to bring production back to the UK.

FAB-L's emphasis is to connect with garment workers by undertaking Outreach work - our workers on the ground have conducted a mapping exercise to establish where the textile hubs, factories and units are situated within the Greater Highfields, Belgrave and Rushey Mead areas.

We work closely with our sponsors (currently ASOS, River Island, Yours Clothing & Garment & Textile Workers Trust) who fund our project and their brand auditors allow us access to the garment workers to promote the project and offer any advice and help that's needed from us to improve their situations within their workplace, and provide for better knowledge of their legal rights in terms of employment, wages and entitlements.

By sharing our publicity and contact information, many garment workers have contacted us discreetly to get further information and advice in relation to workplace issues including unfair dismissal, missing wages leave and redundancy entitlements.

In the following section we outline our responses to the questions posed by the scrutiny commission

1. Track Record

FAB-L specialise in providing support and advice for fashion workers in Leicester. Our team provide access to advice on workers' rights within the textile and fashion industry.

Worker rights and support has also been made to empower workers through education and support services. Organisations like the Leicester-based trade union, Unite, and other grassroots movements have worked with FAB-L to provide migrant workers with knowledge of their rights and to create channels through which they can report exploitation without fear of deportation or job loss. Additionally, labour rights training and support services are being offered to help workers understand their legal entitlements.

Key Achievements in Years One to Three (2022-24):

Financial Recovery:	We reclaimed £170,000 in missing wages for workers who were victims of wage theft. Year 1 £60,000 from 2 factories - Year 2 £54,000 – Year 3 £56,000 Total £170,000 over the 3years.
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Casework Support	We provided over 1000+ hours of casework, valued at £100,000, covering wage theft, dismissals, and unsafe working conditions
Benefits Access	We helped workers access £100,000+ worth of benefits and welfare support from <ul style="list-style-type: none"> - Project registrations - Case handling - Reporting progress on help and support offered - Exit interviews - Recorded outcome from individual and which key person or individuals helped us to resolve their queries (support from brands, unions, ACAS, HMRC).

2. Monitoring and Tracking

Incident Management Systems

- We use tools like Lamplight and Advice Pro to log and track incidents or requests for support.
- These tools provide ticketing systems where each issue is assigned a unique ID
- These systems effectively capture crucial service user information, i.e. personal details (gender, etc) provide a unique case number/reference it's a helpful system to record key inputs and outcomes.

3. Common Signs of Hidden Exploitation

Uncovering hidden worker exploitation requires careful examination beyond visible indications. Exploitation can often remain obscured due to deliberate concealment or systemic issues.

Based on our experience, we would suggest the following indicative ways to assess and investigate hidden worker exploitation.

Common Signs of Hidden Exploitation	Behaviours/Evidence
Inconsistent Data or Reports	<ul style="list-style-type: none"> • Discrepancies between reported hours and pay. • Unexplained patterns in absenteeism or high employee turnover.
Worker Behaviour	<ul style="list-style-type: none"> • Reluctance to report grievances or engage in open communication. • Fearful or overly deferential behaviour, indicating intimidation
Unusual Employment Practices	<ul style="list-style-type: none"> • Use of intermediaries or subcontractors without clear oversight. • Excessive use of temporary, casual, or gig workers who lack formal contracts.
Living or Working Conditions	<ul style="list-style-type: none"> • Poor housing or living conditions for workers. • Evidence of workers being transported or housed together under restricted circumstances.
Third-Party Complaints or Reports	<ul style="list-style-type: none"> • Reports from unions, NGOs, or whistleblowers alleging unethical practices. • Social media or local community concerns about workplace conditions

4. Methods to Investigate Hidden Exploitation

Methods	Focus areas
Worker Interviews	<ul style="list-style-type: none"> Conduct confidential and anonymous interviews to encourage honesty. Use third-party auditors to build trust and avoid bias.
Audit Employment Records	<ul style="list-style-type: none"> Review contracts, payroll data, and hours worked. Check for discrepancies that may indicate underpayment or unpaid overtime.
Engage Independent Audits	<ul style="list-style-type: none"> Use specialised firms to conduct surprise or in-depth audits of practices. Include audits of sub-contractors and suppliers.
Surveys and Feedback Mechanisms	<ul style="list-style-type: none"> Implement anonymous feedback channels, such as suggestion boxes or digital apps. Regularly survey employees on their working conditions
Collaborate with Stakeholders	<ul style="list-style-type: none"> Work with unions, local NGOs, and regulatory bodies to gather insights. Investigate flagged areas or industries known for exploitation risks.
Technology as a Tool for Detection	<ul style="list-style-type: none"> AI-Powered Analysis: Use data analytics to identify anomalies in wages, hours, or productivity that may signal exploitation. Blockchain for Transparency: Implement blockchain systems in supply chain management to track fair labour practices. Social Listening Tools: Monitor social media and online forums for complaints related to labour practices.

5. Addressing Potential Findings

If hidden exploitation is uncovered, here are some suggestions for action:

- Rectify the Issues Immediately - Ensure affected workers are compensated and conditions improved.
- Strengthen Oversight - Increase monitoring and reporting frequency, especially for high-risk areas.
- Educate the Workforce - Provide training on their rights and grievance mechanisms.
- Enhance Transparency- Commit to regular public reporting on labour practices.

6. Identifying forms of worker exploitation (Audience and Locality)

If a particular industry or business model (e.g., gig economy, Garment industry, Car wash, Care industry Food industry, Restaurants) is a primary concern, our work could target specific industries or workers affected by these practices. This could be done through tailored messages that resonate with people working in those fields.

Some of the wider challenges are identifying these freelance workers and individuals as there is less accountability, low pay zero contractors, no job security – therefore, they can be easily open to exploitative practices. This practice is well found in the garment industry and that is what is often sold to vulnerable community groups to exploit them in this sector.

Brands often known as the BUYER will approach the factory owners, send sketches/designs once the factory makes a sample and the factory owner then relays their associated factories for the garment/item. We have found that brands often negotiate terms at the lowest possible price which hardly equates to hours spent on creating a clothing piece. This suggests brands often exploit the factory, with the latter forced to take on work to continue their business and for the brand not to drop them.

7. Identifying forms of worker exploitation (Gender, Ethnicity)

Exploitation is more common in certain localities, (e.g. gig economy garment industry), we have found as part of this project new arrival communities, **South Asian communities and Eastern Europeans** are often exploited and in recent times, we have seen **refuges and asylum seekers** also doing cash in hand work.

Garment sector workers are often **women** - they are targeted as they do not raise their voice or concerns within the workplace and are fearful of losing their jobs.

We have seen some cross over in other work sectors for example food, car washes, hospitality and care work being exposed to the same.

8. Increases/declines in worker exploitation in your experience

Since the FAB-L project commenced 3 years ago, we have found the problem still exists and often it hides and resurfaces every so often. The exploitative practices are often targeted to the most vulnerable people we work with who come with significant barriers or lack of access to any IAG (Information, Advice & Guidance) service via government, council or voluntary sector support, and often living in shared accommodation, with the latter having language barriers and are new to the city, so unaware of where to get the necessary help to access systems and support.

Our experience has highlighted that a key driver for worker exploitation is the lack of legal protections, poverty, systemic inequality, corporate greed, societal and environmental factors – to meet an individual's basic needs.

The way in which we address the worker exploitation or requests for support we encounter is as follows:

- First gather facts, information, root cause to understand individual case
- The project then creates an individual case where it takes the necessary steps and interventions to support that individual
- This could be independently or with NGO's, Unions, law services and brands to facilitate a meeting with the employer to resolve any workplace disagreements.

We report any incidence of worker exploitation to other organisations and agencies that includes the following as collaboration is crucial to tackling worker exploitation:

GLAA, (Gangmaster and Labour Abuse Authority) HMRC, (Her Majesty's Revenue & Customs, CAB (Citizens Advice Bureau) APL, (Association of Labour Providers) FAST FORWARD, REASSURANCE NETWORK, LABOUR BEHIND THE LABEL & UNIONS.

9. Support for Labour Market enforcement

If there is a policy aspect, we target local government officials with a petition or a call to action, urging them to strengthen labour laws and enforcement.

1. Health & Safety and Building regs - Implement legislation and check liability insurance on these businesses
2. Offer community organisations funding and support for business re-growth opportunities
3. Offer free training in different job sectors to support many garment workers who have lost their jobs due to the businesses moving abroad to cut costs.

Summary and Recommendations

We believe that that local council has a vital role to play in tackling worker exploitation across Leicester's labour market: -

1. Take a direct lead on tackling Modern Day Slavery that resonate across the city, empower, and employ more local people who understand the community demographics and hardships better
2. Invest in organisations that are in regular contact with workers and have their trust and confidence to provide support, IAG and advocacy.
3. Support factory bosses/ companies with grants to re-establish self-employment and create jobs for others
4. Increase publicity around breaking the Law and enforce fines for malpractices
5. Increase publicity for workers to access help in multiple languages and a face-to-face service as many are digitally excluded
6. Implement research findings to investigate issues and focus on sub sectors/particular demographic that is underserved, or an emerging issue
7. It is important to approach the subject ethically, ensuring that data collection respects the privacy, safety, and dignity of those involved.

End

Priya Thamotheram – Senior Joint Head of Centre

Vandna Gohil – Joint Head of Centre

Fatimah Li – Deputy Head of Centre & FAB-L Team Leader

Ellias Mussa – Social Welfare Advocacy Worker, FAB-L

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