

Evidence Review: Assessing the nature and scale of modern slavery risk in the construction sector, with a focus on the housebuilding subsector

September 2025

Authors: Dr Gabriela Gutierrez Huerter O, Dr Furqan Suhail and Dr Yazan Alzoubi, King's College London



Research by:



**KING'S
BUSINESS
SCHOOL**

Contents

Acronyms	2
1. Introduction	4
1.1. Conceptual boundaries	6
2. Methods	7
3. Findings	9
3.1. Sub-sectors within the construction industry	9
3.2. Type of evidence	12
3.3. Spectrum of practices evidenced	14
3.4. Factors leading to increased risks of modern slavery	20
3.5. Methods of recruitment	26
3.6. Worker's contractual arrangements and employment status	28
3.7. Living conditions of exploited workers	29
3.8. Worker demographics	30
3.9. Worker trades and occupations	31
3.10. Characteristics of contractors	32
3.11. Types of client	33
3.12. Geographical distribution of exploitation	33
3.13. Stages of the construction process	34
3.14. Other areas of non-compliance	34
4. Key takeaways and recommendations	36
5. Conclusion	41
Appendix 1: Methodology	42

Acronyms

BBC	British Broadcasting Corporation
CCLA	Churches, Charities and Local Authorities
CCSCHEME	Construction Skills Certification Scheme
CEO	Chief Executive Officer
CIOB	Chartered Institute of Building
CIS	Construction Industry Scheme
CITB	Construction Industry Training Board
CPS	Crown Prosecution Service
CSC	Construction Skills Certification Scheme
DLME	Director of Labour Market Enforcement
DtN	Duty to Notify
EAS	Employment Agency Standards
EU	European Union
FLEX	Focus on Labour Exploitation
FOI	Freedom of Information
FWA	Fair Work Agency
GLAA	Gangmasters and Labour Abuse Authority
H&S	Health and Safety
HBF	Home Builders Federation
HMRC	His Majesty's Revenue & Customs
HO	Home Office
HSE	Health and Safety Executive
IASC	Independent Anti-Slavery Commissioner
LEAG	Labour Exploitation Advisory Group
LN	Lexis Nexis
MSA	Modern Slavery Act
NCA	National Crime Agency
NCE	New Civil Engineer
NGO	Non-Governmental Organization
NMW	National Minimum Wage
NRM	National Referral Mechanism
OCG	Organised Crime Group
ODLME	Office of the Director of Labour Market Enforcement
ONS	Office for National Statistics
PBC	Planning, Building & Construction
PEC	Policy and Evidence Centre
PPE	Personal Protective Equipment
PPI	Private Finance Initiative
RIBA	Royal Institute of British Architects
SME	Small and Medium-sized Enterprise
SOL	Shortage Occupation List
UCATT	The Union of Construction, Allied Trades and Technicians
UON	University of Nottingham
VAT	Value Added Tax

1. Introduction

The UK construction sector is a vital part of the economy. Employing approximately 1.4 million people, the sector reached a record high value of £139 billion in 2023,¹ driven by growth in both private and public sector projects. Despite such growth, the sector is facing several challenges. One is a chronic shortage of workers due to several factors like an aging force, a declining interest in vocational careers and the immigration policies. Brexit brought an end to the free movement of EU citizens which contributed to the reduction of the pool of available skilled and low-skilled workers in the UK.² The Shortage Occupation List³ shows that over a quarter of roles included in this list are in construction. In a bid to attract talent to fill in these shortages, the UK government added roles such as bricklayers and stonemasons to this list in July 2023.

The labour shortage has already had consequences for the industry as a whole, including slowed project timelines and increased costs.⁴ In addition, the bold target of building 1.5 million homes in five years established by the government has raised concerns among various stakeholders in that it may exacerbate the shortage of labour and create an environment for playing fast and loose in the respect of workers' rights. Meanwhile, the Fair Work Agency, which has been created as part of the government's Employment Rights Bill to consolidate and enhance the enforcement of employment rights holds potential to address longstanding concerns of exploitation in the construction sector.

Considering these conflicting demands and developments, there is urgency for new research. The Modern Slavery and Human Rights Policy and Evidence Centre (PEC) and the Office of the Director of Labour Market Enforcement (ODLME) have identified the construction sector – particularly, the housebuilding sector – as a priority area and commissioned this research project. The overarching research question is: What is the evidence, nature and risks for modern slavery in the UK construction sector, particularly on the housebuilding sub-sector?

The three specific aims of this project are:

- To systematically analyse and examine the quality and breadth of the existing evidence base on modern slavery in UK construction, focusing on the housebuilding sub-sector;

1. Office for National Statistics, Construction statistics, Great Britain: 2023, 2024. Available at: <https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/articles/constructionstatistics/latest>

2. The Migration Observatory at the University of Oxford. The Migration Observatory informs debates on international migration and public policy. 2021. Available at: <https://migrationobservatory.ox.ac.uk/resources/commentaries/integration-in-the-uk-and-the-post-brexit-immigration-system/>

3. Home Office. Guidance Skilled Worker visa: immigration salary list. 2025. Available at: <https://www.gov.uk/government/publications/skilled-worker-visa-immigration-salary-list/skilled-worker-visa-immigration-salary-list>

4. Construction Industry Training Board (CITB). 2024. CSN Industry Outlook – 2024–2028. Available at: <https://www.citb.co.uk/cwo/index.html#overview>

- To consolidate the key findings from the existing evidence base on modern slavery in the UK construction sector, focusing on the housebuilding sub-sector;
- To make recommendations to policymakers and researchers

To achieve these aims we combined a desk-based analysis with stakeholder interviews with seven informants from the Home Office (HO), the Health and Safety Executive (HSE) and three labour market enforcement bodies under the Director of Labour Market Enforcement (DLME): the Employment Agency Standards (EAS) Inspectorate, the Gangmasters and Labour Abuse Authority, and the HMRC's National Minimum Wage Unit Enforcement Team. The desk-based research included a rapid systematic literature review of 67 academic and non-academic publications. We followed a sequential method design with the desk-based analysis taking place first followed by the interviews. This enabled triangulation and complementarity, to corroborate findings emerging from the systematic literature review and gather insights on the gaps identified in the literature.

1.1. Conceptual boundaries

Acknowledging the absence of consensus around the definition of modern slavery and related practices, it is essential to outline the conceptual boundaries used in this review.

We follow an approach that has been referred to as the 'continuum of exploitation', according to which workers' experiences of exploitation can be understood as existing on a 'continuum'. This continuum of exploitation was used as a conceptual device to map the evidence presented in this report. At one end, there is decent and well-paid work, with bad practices such as breaches of employment rights (e.g., unpaid wages, discrimination, etc.) situated along the continuum, culminating at the opposite end in severe labour exploitation, such as human trafficking and forced labour.⁵ A key argument by proponents of the continuum is that where minor breaches of rights are not sufficiently addressed, it increases the risk of more severe exploitation along the continuum. Modern slavery practices thus sit at the extreme end of a continuum of exploitation.⁶

5. Compliant work is part of the continuum but is not a synonym of decent work. Compliance with labour laws and standards are considered the foundation of decent work. United Nations Global Compact. Labour and Decent Work. 2025. Available at: <https://unglobalcompact.org/what-is-gc/our-work/social/labour>

6. Some of the evidence supporting this causal relationship are Klara Skrivankova. Between decent work and forced labour: examining the continuum of exploitation. 2010. Available at: <https://humantraffickingsearch.org/wp-content/uploads/2017/06/jrf-between-decent-work-and-forced-labour.pdf>; Focus on Labour Exploitation (FLEX). "So I decided to carry on...": The continuum of exploitation in practice. 2024. Available at: <https://labourexploitation.org/app/uploads/2024/02/The-continuum-of-exploitation-report-2024-.pdf>; Labour Exploitation Advisory Group. Opportunity Knocks: Improving responses to labour exploitation with secure reporting. 2020. Available at: <https://labourexploitation.org/app/uploads/2020/04/LEAG-SECURE-REPORTING-FULL.pdf>

The UK Modern Slavery Act defines modern slavery broadly including human trafficking and slavery, servitude and forced or compulsory labour. It considers modern slavery as a crime. According to the UN Palermo Protocol Human trafficking consists of three basic components: action and purpose of exploitation. In human trafficking cases, exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and removal of organs. Some people may not be victims of human trafficking but still victims of modern slavery if they have been subject to slavery, servitude and forced or compulsory labour. The UN 29 Convention concerning forced or compulsory labour⁷ defines 'forced or compulsory labour' as 'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. Servitude is an 'aggravated' form of forced or compulsory labour. The fundamental distinguishing feature between servitude and forced or compulsory labour is in the victim feeling that their condition is permanent and that the situation is unlikely to change.⁸ Finally, debt bondage, also known as debt slavery, bonded labour, or peonage, is the pledge of a person's services as security for the repayment for a debt or other obligation. Victims of forced labour may also be victims of debt bondage where they are tricked into working for little or no money to repay a debt.

We acknowledge that some individuals that have experienced modern slavery, prefer the term 'person with lived experience'⁹ to victim or survivor. Nevertheless, this report uses the term 'victim' to refer to those directly affected, in keeping with the terminology most commonly used in the cited literature.

This report is structured as follows. Section 2 outlines our research design, method and analysis. Section 3 summarises the current evidence on the nature and risk of modern slavery in the construction sector, with a particular focus on the housebuilding sector. It is organised across 14 specific themes, integrating the findings from the rapid systematic literature review of the academic and grey literature and interviews with key informants. Taking stock of all the evidence gathered, section 4 summarises the evidence gaps and develops specific recommendations to improve the existing body of evidence. Finally, section 5 discusses the significance of the findings.

7. Convention C029 – Forced Labour Convention, 1930: [Forced Labour Convention, 1930 \(No. 29\) | OHCHR](#).

8. Home Office. Modern Slavery Act 2015 – Statutory Guidance for England and Wales. 2020. Available at: https://www.gla.gov.uk/media/5638/march_2020_statutory_guidance_under_the_modern_slavery_ac_2015.pdf

9. James Robertson. Framing modern slavery Closing the gaps in the public's understandings of exploitation in the UK. Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC), 2024. Available at: https://files.modernslaverypec.org/production/assets/downloads/MSPEC_Framing_Report_final.pdf?dm=1736268038

2. Methods

To achieve the aims of this project, we undertook a mixed-methods approach combining (1) a rapid systematic literature review of the academic and non-academic literature with (2) semi-structured interviews of informants from UK agencies. This took place in two consecutive stages. A rapid systematic literature review was carried out first, followed by the interviews. This sequential design enabled us to triangulate the findings and complement the evidence found in the literature, particularly around the identified gaps.

The rapid systematic literature review included two simultaneous components. Our approach to the selection of documents is summarised in figure 1.

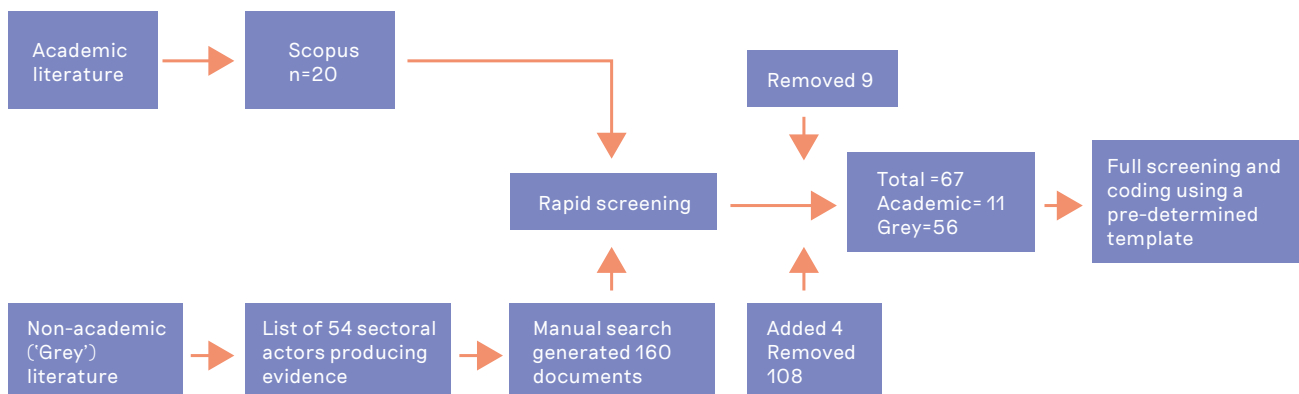


Figure 1: Selection approach used in the rapid systematic literature review

To identify the academic literature, we used the Scopus database, known for its extensive repository of reputable sources. A designed search string (detailed in Appendix 1) was applied to the titles, abstracts, and keywords of publications to extract pertinent documents. This search was confined to documents published in English from the period 2010 to 2025, including journal articles, conference papers, and book chapters, to ensure the inclusion of the most relevant and contemporary findings. This search produced 20 documents. The abstracts of the retrieved documents were scrutinised to ascertain their relevance based on predefined inclusion and exclusion criteria (see Appendix 1). After this step, 9 documents were removed, confining the sample to 11 academic papers.

To identify the non-academic literature, we followed a different approach. Drawing from Gutierrez-Huerter O et al., (2023),¹⁰ we compiled an exhaustive list of 86 sectoral actors, including NGOs, advocacy organisations, professional and labour organisations and government and enforcement bodies (see full list in Appendix 1). This list was used to manually search for relevant materials published on the websites of these actors. This manual search led to the identification of 160 documents. Following a rapid screening detailed in the Appendix 1, we removed 108 documents that were not relevant. Four additional documents were added as our analysis was progressing. A total of 56 non-academic documents were included in the final sample.

We conducted a thematic analysis to analyse the full sample of 67 documents by applying a predefined template building from a set of categories jointly developed by the Modern Slavery and Human Rights PEC and the researchers. Table 1 in the Appendix shows the full list of the 67 documents included in the analysis. The analysis focused on delineating 'what we know' and, importantly, 'what we do not know' about the nature and scale of modern slavery risk in the UK construction and housebuilding sector. The analysis also evaluated the breadth and quality of the evidence. Understanding the knowledge gaps in the literature was crucial as it guided the formulation of interview questions. The interviews aimed at corroborating our findings and complementing them, particularly around the identified gaps in the literature.

Seven interviews were conducted between March and April 2025 with actors from the three labour market enforcement bodies under the Director of Labour Market Enforcement (DLME): the Employment Agency Standards (EAS) Inspectorate, the Gangmasters and Labour Abuse Authority, and the HMRC's National Minimum Wage Unit Enforcement Team, hereafter HMRC NMW. We also interviewed participants from the Home Office (HO) and the Health and Safety Executive (HSE)¹¹. One representative from the DLME was also interviewed. Interviews lasted between 45 and 60 minutes. Interviews asked participants to elaborate on their agency's role considering the spectrum of labour exploitation, their understanding of modern slavery and related practices and the evidence they hold in relation to these in the construction and housebuilding sector.

10. Gutierrez-Huerter O, G., Gold, S. & Trautrim, A. Change in Rhetoric but not in Action? Framing of the Ethical Issue of Modern Slavery in a UK Sector at High Risk of Labor Exploitation. *Journal of Business Ethics* 182, 35–58 (2023). <https://doi.org/10.1007/s10551-021-05013-w>

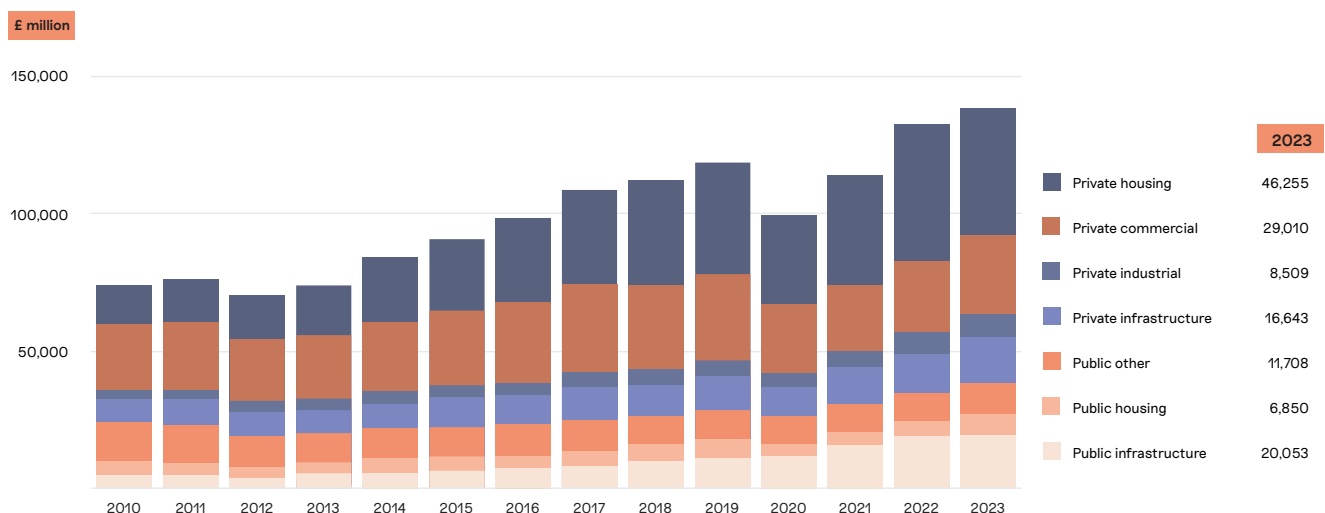
11. There were two participants from the HSE.

3. Findings

3.1. Sub-sectors within the construction industry

Among the 53 non-academic documents reviewed, the housebuilding sub-sector is addressed only in 12 of them. Industrial, infrastructure, and commercial subsectors are the subsectors more prominently featured. Considering that the housebuilding subsector (private and public) corresponds roughly to 40% of the total sector output (see Figure 2 below), the amount of evidence found is not commensurate with the significance of this sector in the UK economy.

Figure 2: Total new work construction output in 2023



Source: Construction Statistics, Great Britain from the Office for National Statistics¹²

Across these eleven documents focused on the housebuilding sector, several reports from the Home Builders Federation (2021–2025) and the Construction Industry Training Board (2023) provide valuable statistical insights into the challenges faced by SME homebuilders and their subcontractors—factors that may heighten the risk of modern slavery. The Farmer Review of the UK construction Labour Model produced by the Construction Leadership Council (2016) outlines the shortcomings of the construction sector labour model and the prevailing business model in the housebuilding sector. A seminal report by

12. Office for National Statistics (ONS). Construction statistics, Great Britain: 2023. 2024. Available at: <https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/articles/constructionstatistics/2023>

the Independent Anti-Slavery Commissioner (2022) showcases findings from *Operation Cardinas*, one of the UK's largest investigations into modern slavery. Conducted by the Metropolitan Police, the National Crime Agency (NCA), and the Gangmasters and Labour Abuse Authority (GLAA), the operation uncovered instances of modern slavery within the housebuilding sector and the broader construction industry. Additionally, reports by Unseen (2023c) and various articles by the magazine Construction News (2018, 2019, 2019b, 2020) link the housebuilding sector to identified cases of modern slavery and severe worker exploitation. Finally, DLME (2021) is one of the few reports offering rich accounts of the lives and employment circumstances of ten construction workers involved in housebuilding.

In academic literature, evidence specific to the housebuilding sector is even more scarce, as most studies (8 out of 11) examine the construction industry more broadly without disaggregating their findings. For instance, some studies include in their sample construction-related businesses—including housing, commercial property, infrastructure, facilities management providers, and materials suppliers (e.g., Trautrimis et al., 2021)—but do not differentiate their results by subsector. Notably, only Jones & Comfort (2022) review the modern slavery statements of the largest housebuilding companies in the UK and study their approaches. They report that housebuilding companies' perceptions of modern slavery risk, as presented in their statements are optimistic by suggesting the risk is low. Existing assessments such as the CCLA Modern slavery Benchmark,¹³ have highlighted the low quality of modern slavery statements of some of the largest construction companies and their reluctance to finding modern slavery due to concerns about reputation.

Our participants agreed on the absence of evidence of modern slavery both in the housebuilding subsector and the construction sector more broadly. The only references mentioned by participants were a handful of 'historical cases' of modern slavery (e.g. The Lupus brothers OCG which is extensively discussed in the IASC Report of the Operation Cardinas included in this review) the Unseen Modern Slavery helpline statistics (published in Unseen's annual assessment report included in this review), and the National Referral Mechanism figures reporting cases of labour exploitation. Unseen (2023) shows that that construction is the industry with the highest number of recorded cases (98) and potential victims (523) of modern slavery in 2023. Specifically in relation to construction sites, the Helpline reports a significant increase in the number of potential victims reporting this location, up from 32 in 2022 to 118 in 2023 – a huge increase of 269%. However not all this data pertains to the UK, since the Helpline receives calls from abroad as well as calls related to situations overseas. According to the

13. Churches, Charities and Local Authorities (CCLA). Modern Slavery UK Benchmark. 2023. Available at: <https://www.ccla.co.uk/documents/ccla-modern-slavery-uk-benchmark-2023/download?inline=true>

National Referral Mechanism (NRM) data for the 2023 year,¹⁴ labour exploitation was the most frequently reported form of exploitation, accounting for 34% of cases and affecting 2,902 victims. However, there is currently no breakdown of how many of these victims were in the UK construction sector.

Expanding on the reasons behind the lack of evidence on modern slavery in the housebuilding sector and broadly the sector, participants highlighted:

- The difficulty of gathering intelligence on labour exploitation at the lowest levels of the supply chain (in terms of access).
- Lack of capacity to build more intelligence (resource intensiveness). For example, the GLAA does not have enough resources to proactively visit food banks and homeless shelters where exploiters find workers.
- The lack of appropriate structures and mechanisms for victims to come forward which is associated to the lack of knowledge of some migrants on how to report labour abuse in the UK.
- Companies often perceive this information as too sensitive to share due to potential reputational risks.
- Investigating modern slavery poses risks for staff members.
- The hidden nature of work in the construction sector—characterised by the absence of proper contracts, bogus self-employment, and payments through umbrella companies.
- The definition of a 'worker' does not fully apply in the sector due to the high prevalence of self-employment (or bogus self-employment) and thus NMW non-compliance is not a risk.
- Many exploited workers who have a migrant background may not identify as victims, choosing to remain in their current conditions as they may still be preferable to those in their home country.
- The enforcement cycle—from allegation to tasking—in organisations like the Home Office and the Employment Agency Standards Inspectorate takes up to two to three weeks. By the time an inspection or visit is scheduled, affected workers may have moved on.
- The sector covers a variety of trades and occupations and secondary roles with varying levels of non-compliance difficult to trace.
- The lack of public engagement in identifying victims.

14. Home Office. Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023. 2024. Available at: <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2023/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2023#key-results>

Considering the scant evidence on the risk of modern slavery in the housebuilding subsector both in the academic and non-academic literature, the following sections synthesise the evidence broadly in the construction sector highlighting those few instances that pertain to the housebuilding sub sector.

3.2. Type of evidence

The existing evidence can be classified in nine types: (1) photographs, (2) anecdotal data,¹⁵ (3) interviews and roundtables with experts and stakeholders, (4) secondary data,¹⁶ (5) case studies of modern slavery,¹⁷ (6) police and journalistic investigations, (7) surveys, (8) economic and statistical data and (9) mixed methods data.

As Figure 3 shows, most evidence both in the academic and non-academic literature is derived from qualitative sources such as interviews conducted with a range of participants, including construction firm managers, procurement officers, and senior industry representatives. While these provide rich insights into organisational responses to modern slavery and sector-level dynamics, accounts of workers and victims of modern slavery are less prominent. In the non-academic literature, police and journalistic investigations are the most frequent type of evidence used.

Representative quantitative data is scarce in the non-academic literature, only a handful of surveys with small sample size (under 150 respondents) have been conducted with workers and businesses. In the academic literature these are virtually absent. Evidence combining some sort of primary and secondary data is common in both the academic and non-academic literature. Most academic studies incorporate secondary data such as modern slavery statements, internal policy documents, training materials, and trade press articles to develop a broader understanding of how the industry responds to and manages modern slavery risks. Within the mix-methods data, academics have engaged in participant observations,¹⁸ a promising method to capture in-situ dynamics. Although not deployed to construction sites, they have been used to capture behaviour and discourse of key sectoral actors (e.g., Barkay et al., 2024; Gutierrez-Huerter O et al., 2023).

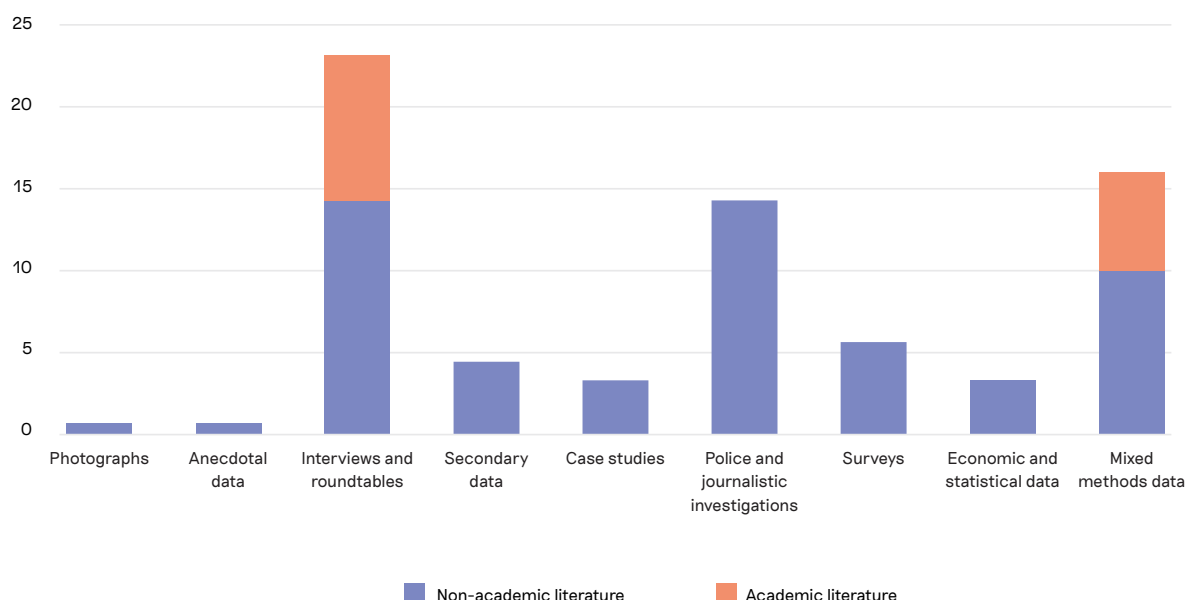
15. Anecdotal data refers to information based on personal experiences or observations and accounts from actors collected in a non-systematic manner.

16. Secondary data refers to information that has been collected by someone else, for example, published studies or government statistics, and is then used by another researcher for their own purposes.

17. Case studies refer to in-depth analyses of specific instances of modern slavery often within their real-world context.

18. Participant observation is a qualitative research method where a researcher becomes actively involved in the group or setting they are studying, while also observing and collecting data. This immersion allows for a deeper understanding of the behaviours, interactions, and practices of the participants from an insider perspective.

Figure 3: Type of evidence



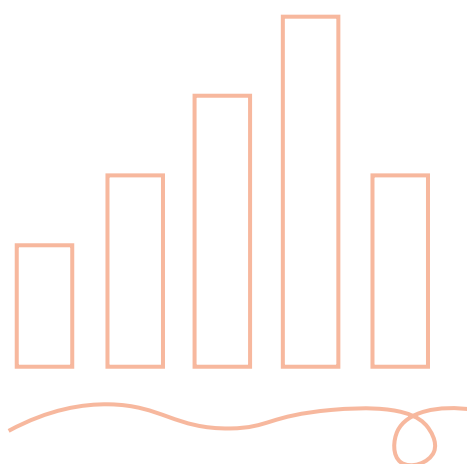
The three enforcement bodies under the DLME (GLAA, HMRC NMW, EAS), alongside the HO and the HSE generate their own internal evidence base on the labour market compliance issues they oversee. This evidence base is built from various sources, including reports from the public, data gathered from inspections, complaints from workers, and referrals from other government departments and agencies. Additionally, the Office of the Director of Labour Market Enforcement (ODLME) issues a public call for evidence to help inform the Director’s annual Labour Market Enforcement Strategy and gathers evidence from stakeholders around issues of labour market compliance. Much of this evidence naturally does not reach the public domain given its sensitivity. This information is then used to apply a risk-based approach and identify sectors of priority. According to these risks, labour models explained in the UK Labour Market Enforcement Strategy 2024/25, the UK construction sector features among the top five sectors facing a risk of modern slavery and deliberate and serious non-compliance.¹⁹ However, this does not necessarily translate into targeted enforcement for the reasons outlined above by participants. With the exception of the GLAA and the HSE, the ‘volume of work’ undertaken in this sector by the HO, and the EAS is relatively low. The EAS faces difficulties identifying non-compliance in the construction sector due to the growth and prevalence of umbrella companies which operate in tiers below an employment agency or business where there is a lack of visibility. The umbrella market is currently

19. HM Government. United Kingdom Labour Market Enforcement Strategy 2024/25 Annex B: Labour market and non-compliance risk analysis. 2024. Director of Labour Market Enforcement. Available at: <https://assets.publishing.service.gov.uk/media/67336b4bbfc4a11a06122078/uk-labour-market-enforcement-strategy-2024-25-annex-b-accessible.pdf>

unregulated.²⁰ Moreover, one of the enforcement gaps for EAS in construction is around self-employment: even where this is bogus and/or forced upon the individual, the EAS regulations cannot be applied (DLME, 2020). The HO stated that despite the low numbers of enforcement visits carried they find a high concentration of illegal working in the sector.

3.3. Spectrum of practices evidenced

We mapped the evidence in our review against the 'exploitation continuum' introduced in section 1.²¹ Table 1 summarises this mapping. Twenty-five documents in the non-academic literature provide qualitative evidence of at least one of the offenses across the continuum. Considering modern slavery encompasses practices such as forced labour, debt bondage and human trafficking, this is the most documented offense (18 documents) followed by instances of underpayment (11) and H&S breaches (7). Working long hours and threats and violence are recorded with equal frequency (5). Our mapping suggests that multiple offenses of exploitation occur simultaneously, and these forms of exploitation are intertwined rather than distinct. Eighteen non-academic documents provide evidence of more than one offense (CCLA, 2024; CIOB, 2016, 2018b; CM, 2017; CN, 2019, 2021b, 2022; DLME, 2020, 2021; Flex, 2018; GLAA, 2018; LN, 2016; NCE, 2024; UCATT, 2023; Unseen, 2023, 2023c).



20. As this report is being written, the government has released the outcomes of its consultation on addressing non-compliance with employment rights and tax obligations by umbrella companies. The response confirms that the Employment Rights Bill will be amended to define umbrella companies, introduce a regulatory framework, and bring them under the remit of the Employment Agency Standards Inspectorate (EAS).

21. To classify the evidence and determine what constitutes modern slavery, we followed the definition from section 1 of this report derived from the UK MSA, according to which modern slavery broadly includes human trafficking and slavery, servitude and forced labour. In this classification, debt bondage is included in forced labour.

Practices	Increasing seriousness of breaches						Modern slavery	
	H&S breaches	Underpayment	Long Hours	Discrimination	Threats and Violence	Confiscation of travel documents	Forced labour (including Debt Bondage)	Human Trafficking
Frequency	7	11	5	2	5	4	11	7
CCLA, 2024							✓	✓
CIOB, 2016		✓			✓		✓	
CIOB, 2018b	✓	✓	✓	✓	✓	✓		
CM, 2017								✓
CN, 2018		✓						
CN, 2018b							✓	
CN, 2019						✓	✓	
CN, 2021b							✓	✓
CN, 2022						✓	✓	✓
DLME, 2020	✓	✓	✓					
DLME, 2021	✓	✓				✓	✓	
Flex, 2018		✓	✓	✓				
GLAA, 2018							✓	✓
LEAG, 2024		✓						
LN, 2016							✓	✓
NCE, 2024	✓				✓		✓	
RIBA, 2018	✓							
The Times, 2024		✓						
The Times, 2024b		✓						
UCATT, 2018	✓							
UCATT, 2019		✓						
UCATT, 2021		✓						
UCATT, 2023	✓		✓		✓			
Unseen, 2023							✓	✓
Unseen, 2023c			✓		✓			

Interviews with the HSE confirmed that the construction sector has some of the highest rates of accidents and injuries but did not connect these incidences to employer negligence. Rather they underscored the inherent risks to the nature of construction work. The most common H&S breaches recorded in the non-academic literature include the lack of proper personal protective equipment (PPE) and training which lead to injuries and fatalities (e.g., BBC, 2019; CN, 2018, 2019, 2020; DLME, 2020; GLAA, 2020b; UCATT, 2023; Unseen, 2023c). A FLEX survey completed by 134 workers in the London construction workforce found that 53% were made to work under dangerous conditions (FLEX, 2018). UCATT (2023) reports that the sector has made significant strides in workplace safety quoting a figure from the (HSE) reporting in 2022 showing a 16.7 per cent drop in fatalities. According to CN investigative report revealed that exploited workers were inadequately dressed for construction work, as they wore dishevelled sportswear (CN, 2019). During our interview with the GLAA, they mentioned that a tell-tale sign of exploitation is the wearing of inappropriate clothing during winter, exposing workers to harsh conditions. Focusing on the less extreme forms of exploitation, UCATT (2018) shows that 89% of the surveyed workers of a large public company that manages the repairs and maintenance of more than half a million social homes in the UK, expressed negative sentiments and stated that poor work conditions were a factor in their illness. Further, workers stated that forced time off and lack of support from their employer discouraged them from speaking up about mental health and illness.

Underpaid work is well recorded in the reviewed sources (UCATT, 2018; 2021; CM, 2017; DLME, 2020,2021; LN, 2016; BBC, 2019; CN, 2019). However, there is an absence of estimates of its prevalence across the sector. The only available figures relate to the wages received by workers. UCATT's reports publicised cases of underpaid work are based on the accounts of exploited workers. LN, (2016) cites a UCATT report from 2007 exposing a 'case of appalling systematic abuse of vulnerable migrant workers' on a construction site in a Private Finance Initiative (PFI) hospital in Mansfield where some workers took home just £8.80, after working a 40-hour week. The workers were paid below agreed minimum rates for the site operated by Skanska, did not receive overtime (some workers worked in excess of 70 hours and took home less than £100) and were charged excessive deductions for rent, tools and utility bills. Other sources report instances where workers have been provided with contracts that require them to undertake 55 hours of work before overtime rates are applicable (UCATT, 2021). In 2017, the CEO of the GLAA cited in CM (2017) stated that some workers may be paid only £3-4 an hour.

During our interview with the HMRC NMW, they confirmed that underpayment in the construction sector emerges from extensive deductions related to training, tools and footwear rather than failures from employers to pay the National Minimum Wage (NMW). However, according to DLME (2021b) the incidence of bogus self-employment and the prevalence of informal cash in hand recruitment may mean that the extent of minimum wage underpayment in this sector is underestimated.

Exploitation through long working hours is considerably recorded (CN, 2018, 2019; DLME, 2020 GB, 2016; GLAA, 2020, 2020b; LN, 2016) CN (2019) reports that exploited workers worked up to 15 hours a day, seven days a week. Pressure to working long hours and 'on-call' shift patterns are particularly difficult for older workers (DLME, 2020) who need flexibility for family reasons.

There is documented evidence of threats and violence as well in five of the non-academic studies. FLEX survey found that 33% of surveyed workers (sample of 134) have experienced verbal or physical abuse while at work. Victims of exploitation faced anxiety, severe stress, depression and mental health issues as a result of mistreatment and victimisation at work (UCATT, 2018; 2023). Workers are discouraged from reporting or speaking up about health and safety issues at their workplace (DLME, 2020) facing threats for doing so. UCATT (2023) reports that if workers do voice their concerns about their experience at work, they risk being made redundant and blacklisted from future employment opportunities. This finding is also confirmed by a Flex (2018) report drawing from a survey and interviews with workers in the construction sector. NCE (2024), FLEX (2018) and LEAG (2024) report that workers in the construction sector overall feel fearful, powerless and withdrawn. DLME (2016) reports that workers often feel unsafe onsite. Additionally, DMLE (2021) and UCATT (2018) elaborate on other poor working conditions such as the lack welfare facilities at work for housing construction workers, including sanitary toilet and eating facilities. It is common that workers are instructed to use public or restaurant toilets (UCATT, 2018).

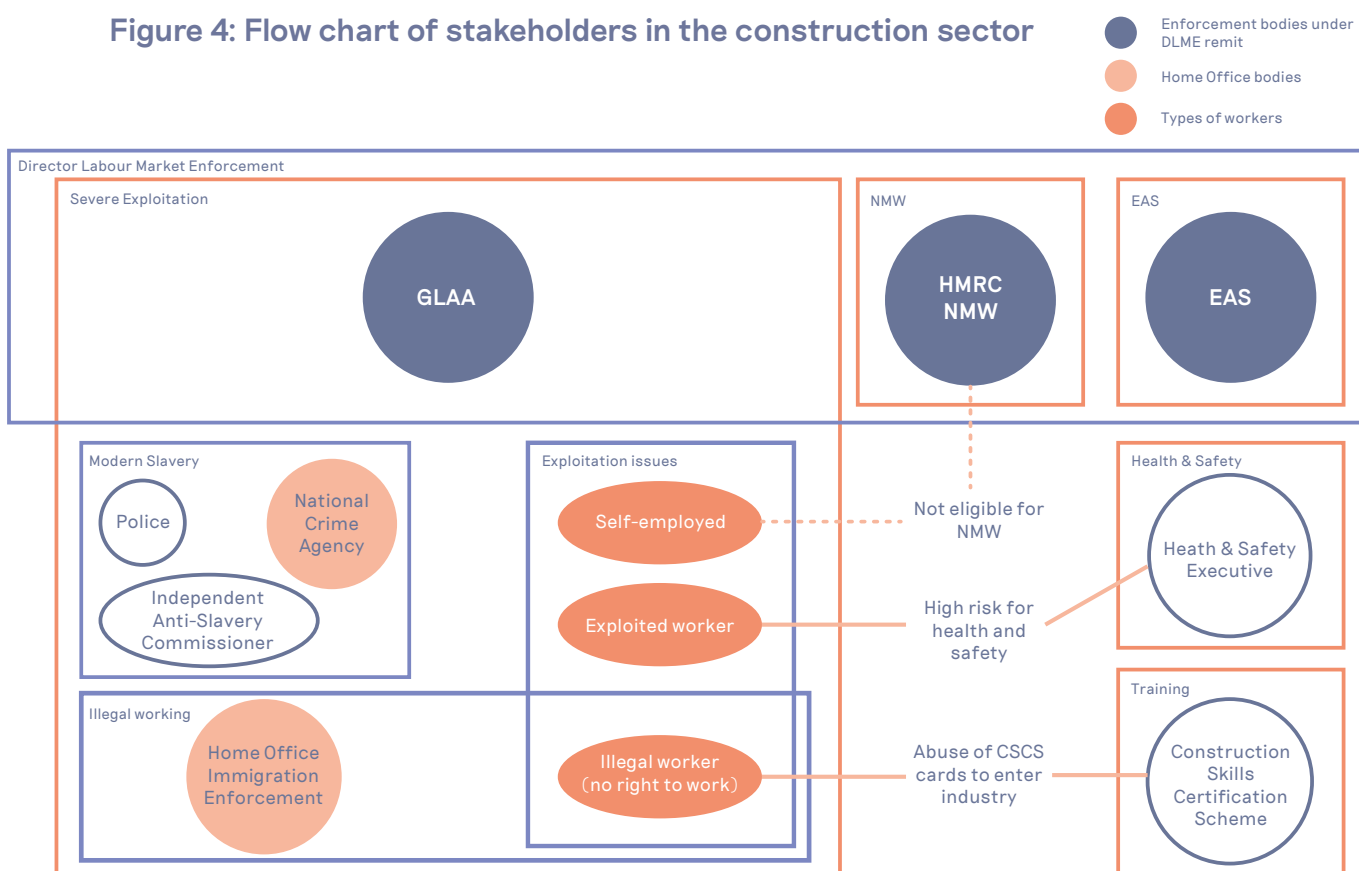
Evidence on the most extreme forms of exploitation of the continuum (forced labour, debt bondage and human trafficking) which are considered as modern slavery, derive from the historical cases of modern slavery in the construction sector publicised in various reports and documents (CIOB, 2018b; CM, 2017; CN, 2018, 2019, 2019b, 2020; GLAA, 2018; IASC, 2022; UNSEEN, 2023). Sections 3.5 and 3.7 elaborate further on the patterns of these abuses.

Using only secondary data, academic studies touch on a variety of practices across the spectrum of exploitation. Five studies (Alzoubi et al., 2024; Cockbain & Brayley-Morris, 2018; Pesterfield & Rogerson, 2023; Russell et al., 2018; and Walsh et al., 2022) describe practices ranging from a lack of health and safety facilities to more severe offences such as confiscation of travel documents. In two of these studies, (Cockbain & Brayley-Morris, 2018; Russell et al., 2018), multiple forms of labour exploitation were documented. For instance, Russell et al. (2018) noted that subcontracted labourers in the construction sector were forced to surrender their travel documents, receive lower wages than promised, and live in inadequate accommodation.

3.3.a Enforcement bodies and the labour compliance under their remit

As mentioned earlier, GLAA, HMRC NMW, EAS, the HO and the HSE generate their own internal evidence based on the labour market compliance issues they oversee such as protection of vulnerable workers, payment, practices of employment agencies and businesses, health and safety and right-to-work respectively. The following diagram illustrates the different responsibilities for labour non-compliance in the construction sector as depicted in the UK Labour Market Enforcement Strategy 2024/25 Annex B:

Figure 4: Flow chart of stakeholders in the construction sector



Source: DLME²²

Note: The Modern Slavery Unit, part of the Home Office has not been depicted in this chart

In the interviews, the HSE stated that they have very a good picture of the scale and prevalence of health and safety issues in the construction sector. H&S issues in the construction sector are highly 'visible' in comparison to the hidden nature that characterises modern slavery. For example, they produce a variety

22. HM Government. United Kingdom Labour Market Enforcement Strategy 2024/25 Annex B: Labour market and non-compliance risk analysis. 2024. Director of Labour Market Enforcement. Available at: <https://assets.publishing.service.gov.uk/media/67336b4bbfc4a11a06122078/uk-labour-market-enforcement-strategy-2024-25-annex-b-accessible.pdf>

of reports with statistics on the prevalence of specific issues (e.g., work-related ill health, the incidence of non-fatal and fatal injuries).²³ For issues like illegal working, underpayment (due to deductions) and abuses from recruitment agencies and businesses in the construction sector, the HO, the NMW unit and the EAS respectively have more difficulties documenting and ascertaining the magnitude of these issues in the sector. The category of 'worker' does not fully apply in the construction sector given the high rates of self-employment and thus the NMW unit receives very few complaints that would trigger an investigation. The prevalence of 'bogus self-employment' impedes establishing the 'employee-employer relationship' to carry out any targeted enforcement. In addition, there is an absence of credible records. Relatedly, the EAS is unable to trace abuses from recruitment agencies given the elongated labour supply chains characterising the sector and the absence of paperwork.

EAS faces difficulties identifying non-compliance in the construction sector due to the growth and prevalence of umbrella companies which operate in tiers below an employment agency or business where there is a lack of visibility. Currently, the EAS does not have jurisdiction over compliance within the umbrella company market but under FWA's development it may.

3.3.b Enforcement bodies' understanding and tackling of modern slavery

Participants' understanding of modern slavery is shaped by the remit of their own organizations and their knowledge of legal definitions outlined in Sections 1, 2, and 3 of the Modern Slavery Act (MSA). Overall, participants were able to distinguish between severe forms of labour abuse or exploitation—potentially amounting to modern slavery—and various 'minor labour offences', many of which their organizations address, such as underpayment and abuses within recruitment agencies.

With the exception of the GLAA, all participants stated that while their organisations may identify indicators of modern slavery through routine work, their specific roles and powers do not allow them to directly intervene in such cases. In these situations, they follow procedures to share information with relevant agencies, such as:

- GLAA, when exploitation is suspected,
- Police, when there is an immediate threat to life or a need for rapid response,
- NCA, when there are signs of organised crime.
- NRM to refer potential victims of modern slavery
- The HO through the Duty to notify process (DtN) process when victims of

23. Health and Safety Executive (HSE). Construction statistics in Great Britain, 2024. 2024. Available at: <https://www.hse.gov.uk/statistics/assets/docs/construction.pdf>

modern slavery do not consent to enter the NRM

Some participants expressed concerns on the accuracy of existing estimates of modern slavery produced by the NRM and others like the Global Slavery Index. They mentioned that modern slavery in the construction sector may not be as 'severe' as it is often portrayed citing measurement and methodology problems. Some participants asserted that if the estimated numbers were accurate, it is uncertain where and what these individuals were and doing during the pandemic lockdowns when the economy was at still. An hypothesis shared by participants is that OCGs considered their victims a 'valuable commodity' during the pandemic. Other participants stated that the fact that these data is missing, should not be taken as a reason to suggest that the issue is less prevalent.

3.4. Factors leading to increased risks of modern slavery

Thirty documents in our review (BBC, 2019; CCLA, 2024; CCSHEME, 2024; CIOB, 2016, 2018b; CITB, 2023, 2023b; CLC, 2016; CN, 2018, 2018b, 2019b, 2021b, 2024; Flex, 2018; GLAA, 2020b; HBF, 2023, 2025; IASC, 2022; LEAG, 2024; NCE, 2024; PBC, 2023; RIBA, 2018; The Times, 2020, 2024, 2024b; UCATT, 2021, 2023; Unseen, 2023, 2023b; UON, 2022) provide qualitative evidence on factors that increase the risks of modern slavery, though they do not always establish a causal link.

The most pressing factor, mentioned nine times in our review, is the shortage of labour (CITB, 2023; GLAA, 2020b; HBF, 2025; HBF, 2024b; The Times, 2024, 2024b; CN, 2019b; Unseen, 2023b; CCSHEME, 2024). Evidence suggests that labour shortages amplify the reliance on migrant workers, including those who are either undocumented or have limited rights to work. Drawing on a survey of 134 construction workers, FLEX (2018) showed that the prevalence of migrant workers seeking informal work is linked to a lack of access to the formal labour market and such informal arrangements are open to abuse. Other sources (e.g., The Times, 2020, 2024b) indicate that that 'unfavourable' government migration policies often compel workers to rely on company sponsorship under the skilled worker route, leaving them vulnerable to exploitation and modern slavery. This link (between sponsored visa schemes and vulnerability to exploitation) has been established recently in the agriculture and care sector²⁴ and was confirmed by GLAA and HO (based on anecdotal data) to also occur in the construction sector.

Drawing parallels from the care sector, participants collectively highlighted growing concerns about labour exploitation risks in the construction sectors, particularly considering workforce shortages and the inclusion of several

24. Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC). UK agriculture and care visas: worker exploitation and obstacles to redress. 2024. Available at: <https://files.modernslaverypec.org/production/assets/downloads/Visas-research-summary.pdf?dm=1736268046>

occupations on the shortage occupation list. The GLAA highlighted that the care sector has already seen a significant rise in complaints of migrant workers under sponsorship. This is raising fears among the organisations interviewed that the current migrant visa routes are not well designed and implemented identifying the risk of modern slavery. Participants highlighted that similar patterns could emerge in construction as the demand for labour intensifies, particularly in relation to ambitious plans for building 1.5 million houses. The GLAA emphasised that exploiters adapt to shifting labour dynamics and thus proactive measures are necessary to mitigate risks of abuse in specific visa schemes and ensure decent working conditions across sectors. The HO expressed concerns over the potential abuse on visas and that employment agencies overseas could exploit the schemes giving rise to debt bondage.

Another frequently mentioned factor is the high cost of doing business (CITB, 2023b; HBF, 2025; HBF, 2023; CCSCHEME, 2024) coupled with employers' short-term profit orientation (UCATT, 2023; RIBA, 2018; NCE, 2024). Low-profit margins in the construction industry (BBC, 2019; CIOB, 2018b) were also reported as contributing to the engagement of businesses in modern slavery practices. CLC (2016), a report recommended by one of our participants, provides a comprehensive review of the UK construction labour model, with a particular focus on the housebuilding subsector. By integrating macro-economic data, secondary sources, and multiple case studies, it examines the factors contributing to the construction sector's underperformance. According to the report, during periods of reduced economic activity, profit margins tend to shrink, exacerbated by the industry's common practice of undertaking 'loss leader' projects to maintain cash flow, with the expectation that future market improvements will offset initial losses. Additionally, the fluctuating pricing of self-employed labour contributes to cost instability and heightens the risk of exploitation—both by workers themselves and by the businesses that contract them—depending on market conditions.

There is ample acknowledgement in the documents reviewed that elongated, also known as extended or long supply chains are common in the construction sector and these amplify the risk of exploitation (IASC, 2022; UCATT, 2019, 2021; CIOB, 2016; CCLA, 2024; LN, 2016; CN, 2019b, 2024; GLAA, 2018; LEAG, 2024; CIOB, 2016; CIOB, 2018b, Unseen, 2023b). Construction businesses in the UK establish contractual relationships with various recruitment agencies, suppliers and contractors (Tier 1). The main contractor then subcontracts work to another subcontractor (Tier 2) who subsequently subcontracts further, creating a chain of subcontractors. As the labour supply chain extends into lower tiers, visibility and oversight diminish, increasing the risk of modern slavery practices. Labour supply chains are not limited to the UK, as they extend across many countries and involve numerous stakeholders – making the supply chain even longer and more complex (LN, 2016). However, there is no specific data pertaining to how extensive these supply chains are. A 2013 report published by the Department

of Business Innovation & Skills²⁵ suggest that some construction projects have 50 to 70 Tier 2 suppliers alone. The difficulty associated with lengthy supply chains is that corporate and governmental oversight is almost impossible as argued by CN (2019b) report citing the remit and capacity of the police and Crown Prosecution Service (CPS) which is to prosecute criminals, rather than mapping a web of business relationships or alerting those at the top that modern slavery is occurring in their supply chains. A survey of 117 construction companies worldwide including UK-based firms conducted by a risk management consultancy published by CM (2016) reports that 39% of 117 construction companies either lack awareness of or have no intention of identifying the entities within their supply chains.

Additionally, definitional challenges around the term 'modern slavery,' were highlighted as contributing to the persistence of exploitative practices (CIOB, 2018b; Unseen, 2023). One layer of these definitional issues pertains to the difficulty of businesses understanding what constitutes 'modern slavery' and who is responsible as highlighted by CIOB (2018b). The academic study of Gutierrez-Huerter et al., (2023) pertains to this problem and elaborates on how the use of specific modern slavery frames has been used to advance specific interests. Their study shows that proponents of a frame defining modern slavery as a crime have attributed responsibility to traffickers and OCGs but failed to redirect responsibility to businesses in the construction sector. This frame has been disproportionally amplified in the public domain by media. As a result, employers often lack awareness of how to identify modern slavery in their supply chains. This has been recognized as a significant risk factor (CCSCHEME, 2024; CITB, 2023; Flex, 2018; LEAG, 2024; Unseen, 2023). In response to businesses' lack of awareness, the GLAA launched the Construction Protocol in October 2017, with signatories primarily from large construction companies. According to members, the protocol was particularly useful for conducting audits, especially for public contracts (DLME, 2021). The GLAA stated its desire to refresh the protocol to reflect the current landscape and anticipated developments over the next five years. They emphasized the need to extend its reach to the lower tiers of subcontracting—not just the large companies at the top—while focusing on due diligence, identifying bad practices, and addressing exploitation. However, they highlighted that many construction businesses do not view the identification of modern slavery as a positive step and are wary of the reputational risks associated with it.

The second layer of these definitional issues is in relation to the threshold for prosecuting modern slavery in the UK by CPS. According to Unseen (2023), an increasing number of cases assessed not meeting the high threshold for modern slavery complicates the accurate identification of the issue. The GLAA confirmed

25. Department for Business Innovation & Skills. Supply Chain Analysis into the Construction Industry A Report for the Construction Industrial Strategy. 2013. Available at: <https://assets.publishing.service.gov.uk/media/5a7c08c040f0b645ba3c6499/bis-13-1168-supply-chain-analysis-into-the-construction-industry-report-for-the-construction-industrial-strategy.pdf>

this point stating that instances of serious labour exploitation—where multiple offences occur, including non-compliance with employment rights and indications of criminal activity—often do not result in modern slavery charges. Only non-modern slavery charges and civil actions may happen. Hence consideration of exploitation close to and below the modern slavery threshold is imminent.

The lack of accountability is also identified as a key factor driving modern slavery in the sector. A University of Nottingham report (2022), based on a survey of 229 businesses—including 169 from the construction sector—revealed that over 65% of participants felt no pressure from the government, consumers, or civil society to address modern slavery.

Lastly, Unseen (2023) notes that the limited capacity in investigative agencies for example like the GLAA has pushed them to decline referrals related to labour abuse. This inevitably leaves some cases of modern slavery unnoticed or unresolved. This insight was confirmed in the interview with the GLAA. The lack of resources also constrained their ability to build more intelligence. For example, they mentioned that more ‘proactive’ work could be conducted in visiting foodbanks and homeless shelters where the recruitment of workers takes place.

All seven risk factors mentioned above were highlighted by participants as contributing to vulnerabilities in labour exploitation within the construction sector. Participants identified high levels of self-employment and ‘bogus self-employment’ as primary risk factors (examined in detail in section 3.6), alongside elongated supply chains, which reduce oversight and complicate labour enforcement.

Drawing on anecdotal data, participants emphasised that intense pressures to complete work on time, coupled with penalties for delays, often lead to compromised working conditions. Additionally, participants raised concerns about factors not captured in the systematic literature review, including the ‘right to substitute’²⁶ model in the construction sector, which affects job security and accountability. The right to substitution is a crucial factor in determining whether an individual is considered self-employed. In the construction sector, many workers are treated as self-employed and therefore do not have access to employment rights (see also section 3.6 on workers’ contractual arrangements and employment status).

In the academic literature, scholars have highlighted the complex interplay of the various sectoral factors mentioned above (e.g., Alzoubi, et al., 2024; Trautrimis et al., 2021; Pesterfield & Rogerson, 2023; Pinnington & Meehan, 2023). However, the majority of academic papers do not evidence them. Rather, they correspond to detailed descriptions with no specific proofs and usually as a background to the study. In other words, these antecedents are not the focus of the research.

26. The **right to substitute model** in the construction sector refers to a contractual clause that allows subcontractors to send a substitute to perform work on their behalf. This means that if a subcontractor is unavailable due to illness, personal reasons, or other circumstances, they can appoint another qualified individual to complete the work instead.

3.4.a Specific risks in the housebuilding sector

Overall, participants did not reach collective agreement on whether the housebuilding sub-sector is more prone to exploitation than other areas of construction. The GLAA indicated that there is insufficient evidence or intelligence to determine whether exploitation is more prevalent in housebuilding compared to other parts of construction. They emphasised that the primary risk factor for exploitation regardless of the type of subsector is the extensive level of subcontracting.

However, participants from DLME, EAS, the Home Office, and HSE suggested—based on anecdotal evidence and in the absence of available intelligence—that domestic construction projects and smaller-scale developments (e.g., house extensions and renovations) present the highest risk within the sector. According to these participants following factors contribute to these vulnerabilities:

Visibility and security in construction projects

- In domestic projects, workers are often hidden, making exploitation harder to detect. In contrast, open construction sites with more workers present provide greater opportunities for abuse to be exposed.
- Larger construction sites typically have security personnel managing entry, with some implementing biometric identity verification systems. For example, some London sites have enhanced security measures, including biometrics and controlled access.

Recruitment and worker relationships

- Recruitment frequently occurs via social media and messaging platforms, resulting in direct worker-employer relationships, which increase risks of abuse and control.
- In small housebuilding projects, the work environment is more informal, with cash-in-hand payments, which create conditions for exploitation.
- The relationship between workers and employers in housebuilding and home improvements is transient, as workers typically remain for only a short period.

Compliance and oversight differences

- Large construction sites are tightly regulated, often requiring construction qualification cards.
- Housebuilding and renovation projects, typically involving a single contractor, have limited oversight regarding worker qualifications and right-to-work compliance. For example, the use of CSC cards is not compulsory.

- Smaller projects, such as home extensions, experience more frequent breaches of regulations, including health and safety violations.
- Major housebuilders and large infrastructure projects adhere to stricter compliance procedures than smaller-scale developments.

Participants noted that, regardless of whether these factors directly lead to modern slavery, the combination of these risks increases the likelihood of exploitation and abuse within the sector.

3.4.b Types of housing project

Private housing projects have been connected in the reviewed documents to specific cases of modern slavery (Unseen, 2023c; CN, 2019b) and to cases of underpayment of wages and lack of welfare facilities for workers (UCATT, 2019). Interestingly, none of the reviewed documents attributed exploitation offenses to public housing projects. Taken together, these pieces of information offer little insight into whether private housing or public housing projects are more or less prone to the risk of modern slavery. This confirms the significant evidence gap highlighted by our participants. This area is neither explored in the academic literature. Only the study of Jones & Comfort (2022) makes references to the largest house building companies in the UK as those with potential to reflect good practice in publicly addressing modern slavery.

3.4.c Type and scale of construction projects

There is very little evidence linking particular construction project characteristic (e.g. type and size) with higher or lower risk of exploitation. Projects involving multiple development types, such as commercial, residential, and mixed-use developments, were explicitly connected to a case of modern slavery notably illustrated through the police-led 'Operation Cardinas' (IASC, 2022).

Large-scale construction projects as well as small sized projects such as residential and smaller commercial development have been both emphasised by their vulnerability to labour exploitation risks. (LN, 2016; CN, 2019b, CM, 2017, HBF, 2023). As highlighted by the former CEO of the GLAA cited in CM (2017), the risks of labour exploitation cannot be ruled out on large as well as small building sites.

3.4.d Brexit and risk of exploitation in the housebuilding sector

Participants were asked whether Brexit had increased the risk of exploitation. Our expectation was that Brexit had contributed to the labour shortages increasing the demand in non-EU labour and that it had created vulnerabilities to EU workers whose legal status had now changed.

Interestingly, all participants agreed that they had neither observed nor found evidence suggesting that this political event had exacerbated the issue. Regarding specific concerns such as illegal working, the Home Office confirmed an increase in arrests of undocumented workers but emphasized the absence of a baseline for comparison. This rise could potentially be attributed to other factors, such as heightened awareness leading to increased reporting. Additionally, the National Minimum Wage unit noted that arrears of pay have been steadily decreasing over time and thus not connected to the exogenous shock of Brexit.

3.5. Methods of recruitment

Methods of recruitment refer to the variety of tactics used by exploiters to attract workers in the UK construction industry. Fifteen documents (CIOB, 2016, 2018b; CITB, 2023; CN, 2019b, 2022; DLME, 2021; GLAA, 2018, 2020b; IASC, 2022; LEAG, 2024; LN, 2016; RIBA, 2018; UCATT, 2023; Unseen, 2023, 2023c) in our sample provide evidence of the common patterns of recruitment drawing from police investigations into cases of modern slavery practices in the construction industry. Together, the evidence suggests that exploiters actively recruit victims – primarily unskilled or low-skilled labourers – from Eastern European countries, targeting non-English speakers (GLAA 2020b). Perpetrators often exploit individuals from their own countries (DLME, 2020) or those with whom they share linguistic or ethnic ties using multiple deception tactics (CIOB, 2018). CIOB (2018) in addition notes that the conditions that lead to worker exploitation are often established in the worker's home country long before they arrive at the work site in the UK.

The GLAA (2020b), IASC (2022), Unseen (2023), and the LEAG (2024) provide rich insights into the deceiving tactics used by abusers. Vulnerable workers are frequently misled by promises of job opportunities that ultimately do not materialise or diverge significantly from the conditions initially offered. The investigative report conducted by the IASC (2022) revealed that by Romanian abusers deceive potential victims by offering enticing employment packages that included wages far above the local average, making the roles seem extraordinarily attractive. The recruitment package also included provisions for travel, meals, and accommodation, further enticing individuals who might be desperately seeking employment. The report notes that such manipulative practices exploit

the hopes and aspirations of workers, ultimately leading them into precarious and exploitative labour situations.

FLEX (2018) highlighted that traffickers and criminal gangmasters frequently use existing or accumulated debt as a means of controlling workers, trapping them in exploitation and forced labour. This practice has been identified on UK construction sites, where migrant workers have been required to pay gangmasters for essential documentation needed to secure employment and access work legally. During our interviews, the GLAA confirmed the use of this practice to lure victims into modern slavery.

Another common pattern evidenced in six of our sources (GLAA, 2018; LN, 2016; CN, 2019b; RIBA, 2018; CIOB, 2018b; UCATT, 2023) is the recruitment of workers through agencies and subcontractors. Abuse has been connected to some international recruitment agencies which according to LN (2016) act as landlords and are involved in renewing work permits and the collection of fees or debts (LN, 2016). Recruitment agents involved in the international labour movement provide labourers wherever there is demand in the UK (GLAA, 2018).

Academic evidence on the recruitment methods used by abusers of potential victims indicates significant gaps, as the majority of the studies (9 out of 11) did not provide specific information. Only one study drawing data from three major police investigations (Operation Netwing, Operation Tundra and Operation Helm) and interviews with senior police officers shows that perpetrators strategically target areas where vulnerable adults are likely to be found such as soup kitchens, homeless shelters or hostels, day centres, job centres, parks, and streets (Cockbain & Brayley-Morris, 2018). This method was also mentioned by the GLAA which highlights the tactical approach by abusers to exploit the vulnerabilities of individuals in precarious social and economic conditions, aiming to recruit those who are already marginalised or in desperate need of employment.

As indicated above, our participants indicated that recruitment of workers in the housebuilding sector frequently occurs via social media and messaging platforms which results in direct worker-employer relationships, which increase risks of abuse and control.

3.6 Worker's contractual arrangements and employment status

In relation to the terms and conditions of employment of workers in the construction sector, seventeen documents in our sample of non-academic sources (BBC, 2019; CIOB, 2018b; CITB, 2023; CM, 2019b; CN, 2018b, 2019b; DLME, 2021; FLEX, 2018; GLAA, 2018; IASC, 2022; LEAG, 2024; RIBA, 2018; The Times, 2024, 2024b; UCATT, 2018, 2019, 2023) shed light on some of the practices which result in labour exploitation and abuses. The evidence points to the pervasiveness of self-employment and 'bogus self-employment'²⁷, zero-hour contracts and the absence of written work agreements.

Self-employment is a dominant work arrangement in the UK construction industry (CITB, 2023; IASC, 2022; CN, 2019 b; DLME, 2021; LEAG, 2024). CITB (2023) notes that a 57% of construction trade occupation workers are self-employed which comes close to 674,000 workers as per ONS statistics²⁸. Self-employed workers have fewer rights than employees and are not entitled to minimum wages (FLEX, 2018) nor holiday pay or statutory sick pay and must provide their own PPE (GLAA, 2018). 'Bogus self-employment' the situation where a worker is classified as self-employed but works under conditions that resemble direct employment is as a significant issue in the construction sector (CM, 2017; CIOB, 2018b; CN, 2018b; DLME, 2021b; Flex, 2018; GLAA, 2018; RIBA, 2018; UCATT, 2018, 2023). This practice allows employers to avoid responsibilities such as holiday pay, sick leave, pension contributions, and employer National Insurance payments. Despite being considered 'self-employed', workers do not have the control and autonomy nor have the awareness of the benefits of being in self-employment. For instance, a self-employed contractor will pay an estimated £2,000 per year less tax than an employee doing the same task and earning the same basic remuneration²⁹. Due to language constraints and difficulties navigating the UK labour market, migrant workers are not aware of their employment entitlements nor their full rights, making it easy for exploiters to abuse them (DLME, 2021). Our participants confirmed this insight. An important piece of evidence put forward by NCE (2024) and Unseen (2023c) is that many workers were unaware they were being exploited.

Many workers in the construction sector are paid through the Construction Industry Scheme (CIS), a tax scheme unique to the sector. While CIS is meant for genuine subcontractors, a large proportion of workers under this scheme are potentially bogusly self-employed. 1.2 million construction workers were paid via the CIS during 2022/23. This was a 15 per cent increase on the figure

27. This is a term commonly used in the literature

28. Office for National Statistics (ONS). Construction statistics, Great Britain: 2022. 2023. Available at: <https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/articles/constructionstatistics/2022>

29. Matthew Taylor. We need to rethink workers' rights in today's gig economy. 2016. The Guardian. Available at: <https://www.theguardian.com/commentisfree/2016/nov/30/rethink-work-taxes-review-modern-employment-gig-economy>

for 2020/21 when 1,05 million workers were paid via the scheme, a 7.5 per cent increase on the previous year³⁰. According to Unite the Union²⁰, the increase in CIS workers is not reflective of any increase in employment in the industry but rather an abuse of the CIS scheme and evidence of the rise in bogus self-employment.

Five documents in our review (BBC, 2019; DLME, 2021b; Flex, 2018; GLAA, 2018; The Times, 2024) highlight the absence of written work agreements, which undermines workers' rights. An investigation by the BBC (2019) found that half of the workers in construction sector do not have a contract, making them vulnerable and prone to exploitation. This finding is supported by FLEX (2018). Informal recruitment routes (causal, word of mouth, pick up points) enables off-record working where cash in hand transactions are often used to suppress income for tax purposes/ DLME (2021b).

Another common employment route in the sector is the use of zero-hour contracts where the employer does not guarantee a fixed number of working hours (CIOB, 2018b; DLME, 2021; GLAA, 2018; LEAG, 2024; The Times, 2024b). Although none of the documents included in our review provide evidence for the proportion of the construction workforce on zero hours contracts, estimates elsewhere suggest that it is a small percentage compared to other sectors like health and social work³¹.

Our review found that there is a complete absence of evidence on worker's contractual arrangements and employment status across the eleven academic papers examined.

3.7. Living conditions of exploited workers

Living conditions of exploited workers refer to the circumstances and quality of a worker's living environment. This encompasses a range of factors, including housing, access to essential facilities, safety, food, sanitation and overall well-being. These elements are intrinsically linked to the concept of a worker's quality of life. This is a well-documented area in the non-academic literature. Eleven documents in our study (GLAA, 2020, 2020b; IASC, 2022; LN, 2016; CN, 2022; CN, 2019; CN, 2021b; RIBA, 2018; Unseen, 2023c; GLAA, 2018; LEAG, 2024) offer rich descriptions on these conditions. Together, the evidence highlights severe poor living conditions, particularly overcrowding, inadequate housing, and unsanitary food and facilities.

30. Unite the UNION. Shock rise in bogus self-employment in construction. 2023. Available at: <https://www.unitetheunion.org/news-events/news/2023/august/shock-rise-in-bogus-self-employment-in-construction>

31. Charlie Schouten. Zero-hours contracts: Should construction be concerned?. 2015. Construction News (CN). Available at: <https://www.constructionnews.co.uk/sections/news/zero-hours-contracts-should-construction-be-concerned-11-03-2015/#:~:text=A%20further%20139%2C000%20people%20in%20the%20health,cent%20of%20the%20industry's%20workforce%20as%20of>

The absence of basic facilities has been documented in four documents (IASC, 2022; GLAA, 2020b; IASC, 2022; RIBA, 2018) particularly the absence of safe and adequate accommodation. These documents note that abused workers often live on the construction sites. Our interviews with the GLAA and the HSE confirmed this as one of the key signs of severe exploitation. IASC (2022) reports that workers' accommodations are often unsanitary and unfit for living, with shortages of bedding and inadequate hygiene standards. CN (2019) and GLAA (2018) note that in some instances, workers are forced to live in caravans. GLAA (2018) describes the living conditions in caravans as inhumane, unsafe and overcrowded.

Evidence also suggests that exploited workers are forced to share cramped rooms, chosen by their exploiter, over which they have little control (GLAA, 2020; CN, 2022; CN, 2021b; LN, 2016; RIBA, 2018). As noted by CN (2021b), this practice often results in mattresses covering entire floors of rooms. According to a report by LN (2016) workers are forced to live in substandard conditions as exploiters confiscate their identity documents and passports, restricting workers' freedom of movement.

Unseen (2023c) and IASC (2022) find that the food provided to workers is often insufficient and inappropriate, which can have an adverse impact on their health. Unseen (2023c) reports that workers are fed expired or rancid food, resulting in severe nutritional deficiencies and health issues.

There is little academic evidence on the living conditions of workers. Drawing on data from three major police investigations, only Cockbain & Braley-Morris (2018) document issues such as inadequate nutrition, lack of access to essential hygiene facilities, unsanitary and makeshift living arrangements, and restricted access to medical care.

3.8. Worker demographics

There is some evidence in non-academic literature regarding worker demographics that are most vulnerable to labour exploitation and modern slavery. The existing evidence suggests that young male workers i.e. workers that are 15, 16 or 17 years old, are those most prone to labour exploitation and modern slavery. According to the CITB Workforce Skills and Mobility in the Construction Sector 2022 report,³² only 19% of the workforce is made up of those aged under 25 and thus the risk of exploitation is relatively low for this group. Among the papers reviewed, one notable article provided evidence with a modern slavery case involving 54 Romanian workers, among whom there was an individual younger than 18 years old (CN, 2021b). Unseen (2023c) presents rich interview

32. Construction Industry Training Board (CITB). Workforce Mobility and Skills in the UK Construction Sector 2022. 2023. Available at: https://www.citb.co.uk/media/uwhbtrkj/2272_bmg_workforce_mobility_and_skills_uk_wide_report_v1.pdf

data highlighting 'Frank's story', the case of a 14-year-old working alongside his father under exploitative conditions (Unseen, 2023c).

Touching on the limited supply of workers in the labour market, HBF (2024) highlights that 25% of the current home-building workforce is over 50 years old, indicating a potential retirement cliff and the increased challenges in recruiting younger workers into the construction sector (HBF, 2025).

The frequent reference to Romanian workers, identified explicitly in ten documents (BBC, 2019; CN, 2018, 2019, 2019b, 2021b, 2022; DLME, 2021; GLAA, 2018, 2020b; IASC, 2022; Unseen, 2023) highlights a pattern of Eastern European labourers who have been identified as victims of modern slavery in the UK construction sector. Other frequently cited nationalities include Polish (GLAA, 2018, 2020), Moldovan (CN, 2019b), Hungarian (GB, 2016), Southeast Asian (LEAG, 2024), and additional Eastern European workers (IASC, 2022; CM, 2017; LEAG, 2024). DLME (2021) report documents the experiences of 9 British nationals.

In terms of immigration status, migrant workers, who often depend upon various types of work visas or employment arrangements, were identified as being susceptible of exploitation in numerous documents (BBC, 2019; CIOB, 2018b; CITB, 2023; CM, 2017; CN, 2018, 2018b, 2019, 2019b, 2021b, 2022; DLME, 2021; GB, 2016; GLAA, 2018, 2020, 2020b; HBF, 2025; IASC, 2022; LEAG, 2024; Unseen, 2023, 2023c). DLME (2021) is one of the few sources exposing the case of a female worker experiencing a lack of respect and sexism.

Our participant from the HO indicated that undocumented Indian and Albanian nationals are more prevalent in the construction sector than Romanian nationals; however, they did not have evidence to confirm that these groups are at the highest risk of exploitation.

Worker demographics concerning victims or those susceptible to modern slavery, shows a lack of detailed data across most academic studies reviewed. Only one study provided specific information regarding the age of victims. This study, based on major police investigations and interviews with senior officers, noted that victims were aged between 24 and 60 years old, with a median age of 47 years (Cockbain & Brayley-Morris, 2018).

3.9. Worker trades and occupations

The reviewed documents provide some insights into specific occupations and trades within the construction workforce that are more susceptible to exploitation. Bricklayers were mentioned explicitly in eight documents (CITB, 2023; 2023b; DLME, 2021; HBF, 2023, 2024, 2024b, 2025; GLAA, 2018) while plasterers appeared in seven (CITB, 2023, 2023b; CN, 2019b; DLME, 2021; HBF, 2023, 2024, 2024b)

The frequent references to these trades suggest their prominence in the sector and their vulnerability to exploitation. General labourers were highlighted in four documents (CITB, 2023b; HBF, 2024, 2024b, UCATT, 2023), indicating another significant area susceptible to exploitation. Additionally, other skilled trades were cited less frequently, including carpenters, roofers, electricians, plumbers, tape joiners, groundwork specialists, painters/decorators, cleaners, and delivery drivers (CCLA, 2024; CITB, 2023, 2023b; DLME, 2021; GLAA, 2020; HBF, 2024, 2024b, 2025; IASC, 2022; UCATT, 2019). IASC (2022) explicitly highlighted specialised trades like asbestos removal specialists. Criminals fraudulently acquired and altered asbestos removal certificates, coercing victims into hazardous work environments where they were exposed to toxic materials without adequate training or awareness to safeguard themselves and others. This range of references highlights the diversity of occupational roles that can potentially face exploitation within the UK construction sector.

In the academic literature, only two out of 11 studies provided specific insights into the types of jobs that victims were forced into. One study detailed that victims were engaged in various forms of manual labour, including tarmacking, block paving, and other property repairs such as painting walls and door-to-door canvassing for trade (Cockbain & Brayley-Morris, 2018). Additionally, it noted that victims performed domestic tasks and repairs at the sites where they were housed, such as cleaning offenders' caravans and picking up rubbish. Another study based on interviews with managers and focus groups identified specific occupations such as groundworkers and plaster-boarders (Pinnington & Meehan, 2023).

Our participants confirmed that those engaged in 'labouring'³³ are those at a heightened risk of exploitation. Labourers typically perform physically demanding tasks that do not require specialized trade skills but are essential for site operations. These tasks can include site preparation, material handling, assisting tradespeople, basic construction work and cleaning and maintenance. Other trades prone to exploitation mentioned by participants are steelwork, concrete laying, tarmacking, and landscaping.

3.10. Characteristics of contractors

Our review reveals scant of evidence on the link between contractors' size and labour exploitation to be able to draw conclusions. Large-scale contractors, including prominent UK construction firms were explicitly mentioned in four documents exposing minor offenses in working conditions (UCATT, 2018; 2019; 2021). These reports document instances of misconduct, such as underpayment of wages, lack of personal protective equipment (PPE), and health and safety issues affecting workers in the housing sector. Medium-sized contractors,

33. Labouring refers to general manual work that supports various building and infrastructure projects.

typically overseeing between 40 and 50 active projects or constructing between 1 and 100 homes annually, were identified in major cases of modern slavery (IASC, 2022). Smaller contractors, generally engaged in less extensive or localised projects, were also linked to modern slavery cases (CN, 2019b). According to DLME (2021), absence of H&S provisions was reported in smaller contractors. Workers exposed to these, believed a cost-saving motivation lay behind these practices.

There is little evidence on the characteristics of contractors that are more at risk of modern slavery. Only one study based on interviews with managers and directors of construction companies suggests that individuals working in functions such as procurement, supply chain, and sustainability of principal contractors, are typically the ones responsible for managing modern slavery risks (Pesterfield & Rogerson, 2023). Another study specifically identified a registered contractor, Carillion plc, suggesting a focus on major, formally recognised entities within the sector (Russell et al., 2018).

3.11. Types of client

Our review indicates an absence of evidence on whether specific types of clients affect the nature or extent of exploitation broadly in academic and non-academic literature. We only found some instances in which government clients, as well as joint venturers involving both private and government clients were connected to a range of worker mistreatment and unfair practices reported by Unite's research (UCATT, 2018, 2019, 2021). These documents highlight issues related to welfare facility incidents, challenges faced by construction workers, and specific cases of labour abuses identified through Unite's research.

3.12. Geographical distribution of exploitation

Our review examined the geographical distribution of construction projects associated with exploitation as well as the locations with more risk to modern slavery. Specifically, London and the South of England have been portrayed as central hub of vulnerability for modern slavery due to its significant concentration of construction activities, high demand for labour, and reliance on migrant workers, as highlighted in 17 documents (BBC, 2019; CITB, 2023, 2023b; CM, 2018; CN, 2018, 2019, 2019b, 2019c, 2019d, 2020b, 2021b, 2022; Flex, 2018; GLAA, 2020b; IASC, 2022; UCATT, 2021, 2023). Among these sources, feature the in-depth investigations of modern slavery (IASC, 2022; CN, 2019b; BBC, 2019). DLME (2021) is a valuable source that provides insights into the experiences of ten construction workers across the UK, including Aberdeen, Somerset, Wolverhampton, Middlesbrough, Great Yarmouth, Birmingham, Manchester, Stockport, Bury, and Bolton.

Our participants confirmed a regional concentration of labour exploitation cases in the in the Southeast of England. The GLAA highlighted that the increased focus on this region is linked to greater opportunities for exploitation due to migrant entry points into the UK and the high volume of construction activity. The concentration on the South of England was supported by anecdotal evidence from the HSE suggesting that exploitation is more commonly found in areas with higher population density. We did not find evidence in our review that this concentration is related to distinctive construction characteristics in this region compared to other parts of the UK.

Additionally, broader regional vulnerabilities were identified in England and Wales (HBF, 2024b; HBF, 2021; HBF, 2024b). Manchester and Birmingham were each explicitly mentioned once, illustrating other localised areas of vulnerability (UCATT, 2018). Furthermore, an international dimension was noted with references to global operations spanning the USA, Spain, Brazil, Australia, South Africa, the Nordics, the Middle East, and Asia, highlighting the global networks influencing or exacerbating risks of modern slavery within UK construction activities (CM, 2016; LN, 2016).

3.13. Stages of the construction process

Examining the stages in the construction process, our review identified several activities where there is vulnerability to exploitation. The demolition stage, which involves site clearing, preparation for new construction was mentioned in four documents containing evidence of police investigations of modern slavery most notably 'Operation Cardinas' (IASC, 2022; CM, 2017; CN, 2019b; LEAG, 2024). General construction activities, groundwork and cleaning tasks associated primarily with post-demolition activities were also connected to exploitation cases (GLAA, 2018; UCATT, 2023; IASC, 2022).

3.14. Other areas of non-compliance

Our review indicates that workers' exploitation in the UK construction sector is often tied to other forms of labour market non-compliance and criminal activity. Various documents in our sample shed light on these practices (GLAA, 2020b; GLAA, 2018; CN, 2019c, 2020b, 2024; CCScheme, 2024; Flex, 2018; LN, 2016). A notable example is the widespread use of fake Construction Skills Certification Scheme (CSCS) cards by exploited workers. CSCS cards which demonstrate a worker's qualifications and training for construction roles, are not legally mandated but are widely enforced by main contractors and major house builders. While it is not illegal to work on a construction site without a CSCS card, most employers will require one.

Criminals give victims cards without completing the required test or victims were given the answers of the test in advance. CN (2019c) uncovered over 2,500 suspicions of alleged fraud offences connected to CITB testing sites where candidates paid up to 25 times the normal test fee at centres in Cheshire, Essex, and London. As a result, 17 test centres involved in fraudulent activities were closed.

Unfair pay deductions by umbrella companies (e.g. paying administrative charges to a payroll provider) represent another issue within the sector (DLME, 2021b). Reports by Flex (2016) and the GLAA (2018) highlight cases of non-payment of tax and national insurance contributions, pointing to possible HMRC fraud. Additionally, corruption in managing paperwork and missing or incomplete records from labour agencies were revealed in cases of modern slavery (CN, 2019b). Despite acknowledging corruption as a widespread problem, CM (2016) reported findings from the Achilles survey of 117 global construction companies showing that 25% of companies lacked bribery and corruption policies when awarding contracts to suppliers.

The prevalence of illegal working in the construction sector is another recognized issue, leading to health and safety risks while increasing workers' vulnerability to exploitation and abuse. CCScheme (2024) conducted an industry survey involving over 550 participants, which revealed that 81% believed illegal working had risen over the last 15 years. Data obtained by Construction News through the Freedom of Information (FOI) Act showed that arrests for illegal working more than doubled from 82 in 2022 to 214 in 2023 (CN, 2024). During our interview with the HO, they indicated that there is currently no established baseline to assess whether illegal working has increased.

Our participants highlighted that various forms of regulatory breaches overlap with exploitation. The GLAA stated that cases of extreme labour exploitation display non-compliance with employment rights (e.g. National Minimum Wage and holiday pay) but are also linked to criminal activity including use of fraudulent documents and abuse of immigration status by a sponsor. The NMW stated that 'unscrupulous employers' abusing workers will most likely engage in numerous breaches across different areas including fiddling with VAT, not paying national insurance contributions and be implicated in money laundering. The EAS mentioned that abuses of umbrella companies, include national insurance skimming and pension contribution frauds. The HO mentioned that they have come across exploitation practices in specific abuse cases of visa schemes. They mentioned that the use of fraudulent CSC cards is a prominent issue in which there is a gap in use enforcement. Finally, the HSE inspectorate confirmed that material breaches of H&S regulations are an indicator suggesting a business is managed poorly and thus there would be non-compliance across different areas. Blacklisting was mentioned by the HSE as one of the known employment breaches in the construction industry that erode workers rights.

4. Key takeaways and recommendations

This section consolidates the blind spots of current evidence derived from the previous section, emerging issues highlighted by participants and outlines ten recommendations for researchers to develop the base evidence and re-direct focus of policymakers.

1. The academic literature on modern slavery in the UK construction sector is underdeveloped, offering limited evidence on the dynamics and patterns of labour exploitation and/or modern slavery. Within the housebuilding sector, in particular, the field of research can almost be regarded as non-existent. There is scarce evidence on how various factors—such as the type of client, the type of housing projects, the scale of these projects, the stages of the construction process, and the characteristics of contractors—might exacerbate the risks of modern slavery and wider issues of exploitation. The grey literature provides somewhat more detail on ‘how’ extreme exploitation occurs drawing rich qualitative insights from a handful of retrospective analyses of modern slavery cases. While this evidence is informative, there is an absence of quantitative studies using large sample sizes to estimate patterns of exploitation in both the construction and housebuilding sector.
 - **Recommendation:** More research, encompassing both small qualitative research designs as well as large-scale quantitative designs are needed to generate robust primary data on the nature of modern slavery and labour exploitation in the UK housebuilding sector and the broader patterns and trends of the scale of the risk of exploitation. Both qualitative and quantitative approaches add value in their own distinctive ways. Such research should aim to include some of the variables mentioned above. Small qualitative comparative studies could, for example, examine differences in the risk of exploitation between housing projects commissioned by public versus private clients. In addition, researchers should carefully consider whether data collection techniques are appropriate to capture hard to reach populations (e.g. vulnerable workers and businesses hesitant to participate in research). Traditional probability sampling methods may not be feasible for studying these elusive populations in large scale surveys. Researchers should therefore consider purposive³⁴, snowball³⁵ and network³⁶ sampling methods. Despite

34. Purposive sampling is a non-probability sampling technique where researchers intentionally select participants based on specific characteristics or criteria relevant to the research question.

35. Snowball sampling, also known as chain-referral sampling, is a non-probability sampling technique where current research participants help recruit future participants from among their acquaintances.

36. Network sampling in research refers to methods used to study social or other types of networks by selecting subsets of nodes (individuals or entities) and/or connections (edges) within a larger network structure.

their inherent limitations, they may facilitate access to these populations. For qualitative studies, ethnographic methods are better suited to study these populations.

2. The scale of modern slavery within the construction and housebuilding sub-sector, as well as its dispersion across the UK, remains largely unknown. Statistics provided by the National Referral Mechanism (NRM) and the Duty to Notify (DtN) process on the number of individuals identified as potential victims of modern slavery in the UK do not offer a sector-specific understanding of the type of exploitation, nor do they provide granular insights into its geographical distribution. The Salvation Army provides data on the number of potential victims of forced labour who enter their support system,³⁷ disaggregated by region but not by employment sector. The only available estimates of labour exploitation and potential victims in the construction sector originate from figures provided by the Modern Slavery and Exploitation Helpline in their Annual Assessment. However, these figures cannot be considered an accurate reflection of prevalence and include cases occurring both within the UK and internationally. In certain instances, documents have offered rich information on victim profiles, locations, and the methods used for recruitment and transportation of victims to the UK. However, such documents—such as the Construction Industry Profile published by the GLAA in 2020 based on their own intelligence and investigations—have not been regularly updated or published.
- **Recommendations:** Existing data should be exploited better. The Home Office should consider the use of specialised text analysis techniques methods to segregate the NRM by type of exploitation across different sectors, subsectors and devolved nations. It should also provide a breakdown of instances where more than one type of exploitation occurs. The Modern Slavery and Exploitation Helpline should separate data on UK-specific and international incidents within the construction sector. The Salvation Army should provide estimates of their UK data at the sectoral level. The GLAA should update or review construction profile assessments annually to better track and understand trends of labour exploitation in the sector. Ops agencies should consider pooling their intel and knowledge into a single version of the intelligence assessment. These measures would enable the creation of a more accurate and comprehensive understanding of the scale of modern slavery and labour exploitation within the construction sector, while contributing to a richer picture over time.

37. The Salvation Army. Report on The Salvation Army's Modern Slavery Victim Care Contract. 2024. Available at: <https://www.salvationarmy.org.uk/sites/default/files/resources/2024-10/953%20Modern%20Slavery%20Report%202024%20FINAL%20PDF%20version.pdf>

3. Existing evidence in the grey literature does not uniformly address a specific phenomenon. Instead, it is fragmented, focusing on specific offenses across the labour exploitation continuum. The evidence highlights the prevalence of minor labour abuses, such as underpayment, health and safety violations, long working hours alongside more severe practices, including threats, and violence. The spread of illegal working and the fraudulent use of fake Construction Skills Certification Scheme (CSCS) cards are also well-documented and acknowledged by enforcement bodies. Some evidence in this report has strived to qualitatively establish the contribution of minor labour abuses and non-compliance to modern slavery by drawing from victim's accounts and anecdotes. However, comprehensive evidence of these underlying trends across the whole sector is missing.
 - **Recommendation:** Future research should prioritise investigating the connection between less serious labour abuses, H&S issues and the risk of modern slavery. This research could be studied by deploying a mixed method approach combining a large-scale survey to workers in the construction sector with selected interviews. The survey should assess the incidence of abuses across the continuum of exploitation and examine how this prevalence correlates with key risk factors. A notable example of a large-scale and representative survey is that of Pósch et al, (2024) as part of their DMLE commissioned project on the scale and nature of labour market non-compliance affecting precarious workers. The design of the survey instrument should account for potential language barriers and workers' limited understanding of employment rights. Additionally, it should consider that certain minor labour abuses may be perceived as 'normalised' by some workers, ensuring that the wording of survey questions reflects this reality. This survey could then be followed by selected interviews with workers which have experienced a variety of abuses across the continuum of exploitation to establish whether there is casual link between less serious labour abuses and modern slavery. Recommendation 6 below provides some suggestions on how to engage with marginalised workers. An extension of this research could also involve a longitudinal review of specific non-compliance cases using intelligence from DLME agencies. Research could also leverage specific datasets on workplace abuse (e.g., HSE's complaints and whistleblowing systems) to systematically analyse patterns of exploitation. Together, this evidence would help labour enforcement to develop indicators for spotting non-compliant businesses or modern slavery risks.
4. Existing evidence on modern slavery and labour exploitation is predominantly concentrated in the south of England, particularly in London. While our participants and some of the evidence justified this geographical concentration because of the high volume of construction activity and the migrant entry points into the UK, there may be some underlying biases of researchers in focusing their research in this geographical area.

At present, there is no evidence suggesting that this concentration is related to distinctive construction characteristics in this region compared to other parts of the UK.

- **Recommendation:** Future research should shift its geographical focus beyond London/South-East and to the devolved nations, where evidence is almost non-existent. This could include comparative studies of housing projects—similar in size and client profile—across Scotland, Northern Ireland, Wales, and other regions of England, excluding the South.
5. Most of the recorded cases of modern slavery in the construction sector have been linked to large infrastructure projects but there is lack of evidence and agreement (from labour market enforcement agencies) as to what happens in small domestic projects.
- **Recommendation:** Future research should examine whether small-scale housing projects (e.g., renovations, extensions) are more or less prone to exploitation than large scale projects (e.g. large residential projects) by exploring the differences in risk factors.
6. Albeit with a few exceptions, most of the qualitative evidence pertains to interviews and testimonials from ‘experts’ and accounts from perpetrators (as in police investigations) leaving the voices of workers and victims directly affected underrepresented. Moreover, there is little evidence from influential actors within the supply chain who may have insights into the issue.
- **Recommendation:** Future research should prioritise amplifying the voices of workers who experience and/or witness exploitation on sites and other stakeholders including frontline workers within the sector—such as labour inspectors, health and safety officers, and union representatives—who possess critical insights into exploitative practices. Researchers should engage with non-governmental organizations (NGOs), trade unions and representatives from vulnerable and migrant communities to co-produce worker-driven research. A recent example of co-production of research and collaborative approaches with migrant and community organisations is Thiemann et al., (2024)³⁸ study of the impact of visa routes in worker exploitation in the UK agriculture and care sector. The HSE operates under a tripartite structure, its close relationship with trade unions presents an opportunity for researchers to develop collaborations. This type of collaborations would help researchers minimise the ethical and safety risks from collecting primary data and generate research that is inclusive and sensitive to vulnerable populations.

38. Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC). UK agriculture and care visas: worker exploitation and obstacles to redress. 2024. Available at: <https://files.modernslaverypec.org/production/assets/downloads/Visas-research-summary.pdf?dm=1736268046>

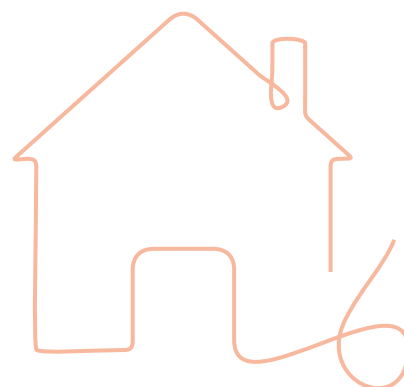
7. Evidence from businesses is virtually absent. This is possibly due to fears of reputational damage and resistance to participate in research projects. In those instances where businesses may be willing to participate, access to workers, particularly those in precarious working conditions is challenging.
 - **Recommendations:** Researchers should consider engaging with existing networks of major homebuilders in UK, such as the Supply Chain Sustainability School homebuilder working group, participants of the CCLA construction sector roundtable on modern salary and former supporters of the GLAA construction protocol which may be willing to take part in research projects. Given the difficulty in accessing workers, researchers need to consider more suitable methods of data collection such as ethnographies and participant action research.
8. Currently, there are no mechanisms to jointly oversee cases of serious labour exploitation involving non-compliance across multiple areas within the remit of DLME agencies. Our interviews with labour market enforcement bodies highlighted that cross-agency collaboration is essential to tackling labour exploitation effectively.
 - **Recommendation:** Research should evaluate methods for optimising intelligence-sharing between government departments and enforcement bodies, ensuring harmonized responses that leverage all available investigative powers. This research should consider how communication could be streamlined across agencies to avoid silos. Such a project could take the form of action research. The examination of real-time holds potential to highlight gaps in agency coordination, informing more integrated enforcement frameworks across DLME bodies. Additionally, evaluations of 'best practice' should be investigated for where multi-agency activity has been successful in the past so these practices can be adopted and built upon. This research would require substantial support from the DMLE in terms of access and researchers' clearance given the sensitivity of the data. Alternatively, DMLE could undertake this research internally. The ODLME should ensure that the different enforcement bodies work cohesively, with a unified understanding of labour exploitation risks and enforcement actions in the context of the Fair Work Agency. Finally, future research should consider international comparisons. The construction sector is a highly complex industry that faces persistent challenges across the globe. Understanding of how other contexts have dealt with the demand of domestic construction capacity while ensuring decent working conditions would shed light on lessons that the UK could draw upon.

5. Conclusion

This report synthesises existing findings on the nature and risks of modern slavery in the housebuilding and construction sector, based on a systematic literature review of 67 documents and interviews with key labour market enforcement bodies, government departments, and agencies.

The review has surfaced a range of mostly qualitative evidence on the nature of exploitation risks and the drivers of risk in the construction sector broadly. Yet specific evidence on modern slavery risks in the UK housebuilding sub-sector are lacking. It underscores the urgent need for both further qualitative and quantitative research and a shift in the methodologies used to study this issue.

As of the time of writing, the Labour government remains committed to its pledge to build 1.5 million homes before the next election. It has also published the white paper 'Restoring Control Over the Immigration System', which aims to reduce net migration and incentivise businesses to recruit domestic workers. The paper outlines proposals to abolish the Shortage Occupation List (SOL) and raise several construction-related roles—currently considered below degree level (e.g., bricklayers, roofers)—to degree-level status. These proposals add further pressure on construction firms already striving to meet the government's ambitious housebuilding targets. Meanwhile, several government announcements, such as the £600 million investment to train 60,000 additional skilled construction workers³⁹ and the £132 million allocated for Skills Bootcamps in 2025–26 across priority sectors—including £100 million specifically for construction⁴⁰ as part of the government's apprenticeship overhaul—seek to address these shortages. Collectively, these developments signal a shift in government strategy to tackle workforce shortages, which future research will need to assess in relation to the nature and scale of modern slavery risk in the housebuilding sector.



39. GOV.UK. Government unleashes next generation of construction workers to build 1.5m homes. 2025. Available at: <https://www.gov.uk/government/news/government-unleashes-next-generation-of-construction-workers-to-build-15m-homes>

40. Ben Flatman. Government announces apprenticeships overhaul. 2025. Building. Available at: <https://www.building.co.uk/news/government-announces-apprenticeships-overhaul/5136173.article>

Appendix 1: Methodology

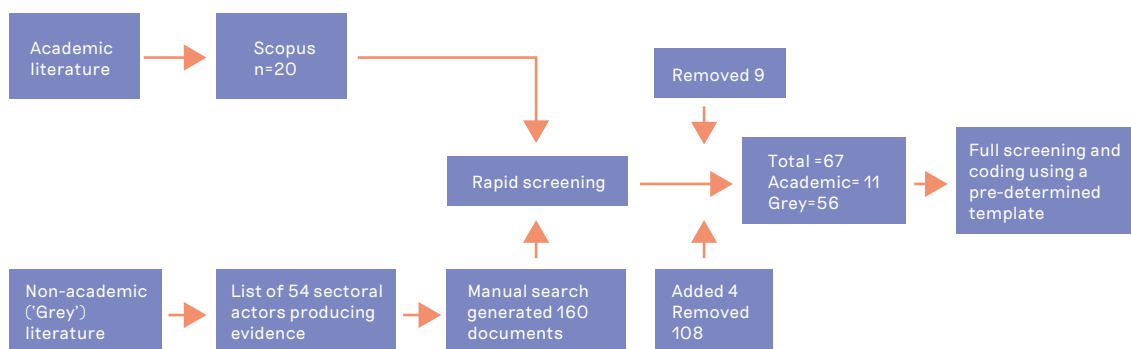
1. Research design

We adopted a mixed-methods approach combining (1) a rapid systematic literature review of the academic and non-academic literature with (2) semi-structured interviews of participants from UK agencies. This took place in two consecutive stages. The rapid systematic literature review was carried out first, followed by the interviews. This sequential design enabled us to triangulate the findings and complement the evidence found in the literature, particularly around the identified gaps.

2. Rapid systematic literature review

The rapid systematic literature review included two simultaneous components. Our approach to the selection of documents is summarised in Figure 1 and explained below.

Figure 1: Selection approach followed in the rapid systematic literature review



2.1 Academic literature

Following Alzoubi et al. (2023)¹, the rapid systematic literature review started with the use of the Scopus database, chosen for its comprehensive repository of high-quality and reputable academic sources. Scopus is widely recognised for its broad disciplinary coverage and rigorous indexing standards, making it an ideal platform

1. Alzoubi, Y., Locatelli, G., & Sainati, T. (2023). Modern Slavery in Projects: A Systematic Literature Review and Research Agenda. *Project Management Journal*, 54(3), 235–252. <https://doi.org/10.1177/87569728221148158>

for identifying scholarly literature on complex, interdisciplinary topics such as modern slavery in the UK construction sector. The aim of using this database was to ensure extensive and reliable coverage of the most relevant academic work aligned with the research objectives.

A carefully designed search string was applied to the titles, abstracts, and keywords of publications to maximise the capture of relevant studies. The search string used was:

TITLE-ABS-KEY (“modern slave” OR “labo* exploitation” OR “forced labo*” OR “debt bondage” OR “human trafficking” AND “construction” OR “housebuilding” AND “UK” OR “United Kingdom” OR “London” OR “Wales” OR “Northern Ireland” OR “Scotland” OR “England” OR “Britain”).*

This formulation enabled the inclusion of variations in terminology while maintaining a geographical focus within the UK context.

The search was restricted to journal articles, conference papers, and book chapters published in English between 2010 and 2025, ensuring the inclusion of contemporary and high-quality academic findings. We coined the start of our search to the year 2010 acknowledging a variety of international events that involved the construction of infrastructure to support these events. These included the 2014 FIFA World cup and the 2016 Summer Olympics in Brazil. This initial search returned 20 documents, representing a focused yet sufficiently broad set of scholarly contributions that address the topic.

Following the search, the titles and abstracts of the retrieved documents were closely scrutinised to determine their relevance based on predefined inclusion and exclusion criteria. This rigorous filtering process was conducted to ensure that only literature pertinent to the research objectives was retained for further analysis. The criteria applied were as follows:

Inclusion Criteria: Documents must specifically discuss aspects of modern slavery within the UK construction sector.

Exclusion Criteria: Documents discussing modern slavery in contexts outside the UK construction sector were excluded.

After applying these criteria, nine documents were excluded, resulting in a final sample of 11 academic documents considered directly relevant to the research. These selected publications formed the evidence base for the next stage of the review, which involved detailed thematic analysis and synthesis.

2.2. Non-academic literature

To identify the non-academic literature, we followed a different approach. We generated a list of UK sectoral actors drawing from that of Gutierrez-Huerter O

et al., (2023)². This list summarised in Table 1, includes 86 actors such as NGOs, certification bodies, unions, advocacy organisations, professional and labour organisations and government and enforcement bodies who may have produced evidence on modern slavery.

Table 1: List of construction sector actors adapted from Gutierrez Huerter O et al., (2023)

Category	Actor
Industry Skills and Standards Body	Construction Industry Training Board (CITB)
	British Standards Institution (BSI)
Certification bodies	Construction Skills Certification Scheme
	UK Certification Authority for Reinforcing Steels
Industry knowledge initiatives	Supply Chain School
	Construction Excellence (excluding BRE group)
	Build UK
	BRE Group
	The Action Programme for Responsible and Ethical Sourcing
	Sustain Worldwide
Trade and professional associations	Chartered Institute of Building (CIOB)
	Royal Institute of Architects (RIBA)
	Royal Institution of Chartered Surveyors (RICS)
	Institute of Environmental Management and Assessment (IEMA)
	Institution of Civil Engineers (ICE)
	Surveyors UK
	Chartered Institute of Procurement and Supply (CIPS)
	Construction Industry Council (CIC)
	Home Builders Federation
	Federation of Master Builders
	National Federation of Builders
	Association of Labour Providers (ALP)
NGOs	Unseen UK
	Stop the Traffik
	Anti-Slavery International
	Hope for Justice
	St Martin-in-the-Fields Charity
	Stronger Together
	The Passage in Westminster
Campaign groups	The Blood Bricks Coalition
	Focus on Labour Exploitation (FLEX)
Think tanks	Business and Human Rights Resource Centre
	Institute for Human Rights and Businesses.

2. Gutierrez-Huerter O, G., Gold, S. & Trautrim, A. Change in Rhetoric but not in Action? Framing of the Ethical Issue of Modern Slavery in a UK Sector at High Risk of Labor Exploitation. *Journal of Business Ethics* 182, 35–58 (2023). <https://doi.org/10.1007/s10551-021-05013-w>

Category	Actor
Industry Union	Union of Construction Allied Trades and Technicians (UCATT)
	General, Municipal, Boilermakers and Allied Trade Union (GMB)
	Unite the Union
	International Trade Union Confederation (ITUC)
	Union Solidarity International
	Trades Union Congress (TUC)
Watchdogs	Labour Exploitation Advisory Group
	Corporate Responsibility Coalition (CORE)
Consultancy and Law firms	Action Sustainability
	BSI supply chain
	PwC
	Essex Chambers
	Ergon Associates
	Mazars LL
	EY
	Herbert Smith Freehills
	Thompson solicitors
	International Bar Association
	Gallagher Insurance Brokers
	Responsible Trade Worldwide
	Upstream Sustainability Services at Jones Lang LaSalle
	Gowling
Media outlets	The Times
	ESG investor
	BBC
	Growth business
Construction magazines	The Planning, Building & Construction Today
	Building Magazine
	Construction Management by CIOB
	Lexis Nexis
	Construction News
	Building Design
	UK Construction Online
	New Civil Engineer
Law and government enforcement agencies	The Metropolitan Police, modern slavery and kidnap unit
	Gangmasters and Labour Abuse Authority (GLAA)
	National Crime Agency (NCA)
	Director of Labour Market Enforcement (DLME)
Construction Investor community	PA Future
	CCLA
Universities	University of Nottingham
	University of Sheffield
	University of Bristol

The refined list was then used to manually search the websites of the identified organisations for relevant materials. Only 54 actors from this list had produced pertinent documents. This search yielded 160 documents. However, many contained terminology aligned with our research but lacked specific evidence. Instead, they focused on advising businesses on compliance with Section 54 of the Modern Slavery Act. Others were articles or opinion pieces referencing secondary sources. These were excluded. We retained only original sources that provided some evidence of modern slavery within the construction sector. Following this screening, 108 documents were removed as irrelevant. Four additional documents were identified during the analysis and write up of the final report. One report i.e., CLC, (2016), was pointed out by a participant one was identified by one of the researchers through the reading of a piece already included in the sample i.e., CCScheme (2024). Two additional documents were suggested by stakeholders who provided feedback to the report i.e., DLME (2020,2021). A total of 56 non-academic documents were included in the final sample.

2.3. Analysis

We conducted a thematic analysis to analyse the full sample of 67 documents. Table 2 shows the full list of the 67 documents included in the analysis. We applied a pre-defined template building from a set of categories jointly developed by the Modern Slavery and Human Rights PEC and the researchers. These included the 14 thematic categories included in the findings. The analysis focused on delineating 'what we know' and, importantly, 'what we do not know' about modern slavery in the UK construction and housebuilding sector. The analysis also evaluated the breadth and quality of the evidence. Understanding the knowledge gaps in the literature was crucial as it guided the formulation of interview questions. The interviews aimed at corroborating our findings and complementing them, particularly around the identified gaps in the literature.

Table 2: Full list of documents included in the review

	Reference	Title	Journal/Outlet
Academic papers			
1	Alzoubi et al., 2024	Turning a Blind Eye: Ignoring Modern Slavery in the Race to Construction Project Completion	Journal of Construction Engineering and Management
2	Barkay et al., 2024	Transparency Legislation in the UK Construction Sector	Law and Social Inquiry
3	Cockbain & Brayley-Morris, 2018	Human trafficking and labour exploitation in the casual construction industry: An analysis of three major investigations in the UK involving Irish Traveller offending groups	Policing (Oxford)
4	Craven, 2015	The role of public procurement in the fight to eradicate modern slavery in the UK construction industry	Public Procurement Policy
5	Gutierrez-Huerter O et al., 2021	Change in Rhetoric but not in Action? Framing of the Ethical Issue of Modern Slavery in a UK Sector at High Risk of Labor Exploitation	Journal of Business Ethics
6	Jones & Comfort, 2022	Modern slavery statements and the UK's largest housebuilding companies: an exploratory research paper	Property Management
7	Pesterfield & Rogerson, 2023	Institutional Logics in the UK Construction Industry's Response to Modern Slavery Risk: Complementarity and Conflict	Journal of Business Ethics
8	Pinnington & Meehan, 2023	Learning to see modern slavery in supply chains through paradoxical sensemaking	Journal of Supply Chain Management
9	Russell et al., 2018	Can the SDGs provide a basis for supply chain decisions in the construction sector?	Sustainability (Switzerland)
10	Trautrimis et al., 2021	The UK construction and facilities management sector's response to the Modern Slavery Act: An intra-industry initiative against modern slavery	Business Strategy and Development
11	Walsh et al., 2022	Increased Risks of Labor Exploitation in the UK following Brexit and the Covid-19 Pandemic: Perspectives of the Agri-food and Construction Sectors	Journal of Human Trafficking
Non-academic papers			
12	BBC, 2019	Exploited' workers propping up the building sector	British Broadcasting Corporation
13	CITB, 2023	Migration and Construction (Industry Insights and Analysis)	Construction Industry Training Board
14	CCLA, 2024	Modern slavery in construction roundtable: 18th April 2024	CCLA Good Investment
15	CCSCHEME, 2024	Spotlight on illegal workers	Considerate Constructors Scheme
16	CIOB, 2016	Building a Fairer System: Tackling Modern Slavery in Construction Supply Chain	Chartered Institute of Building
17	CIOB, 2018b	Construction and the Modern Slavery Act, Tackling Exploitation in the UK	Chartered Institute of Building
18	CITB, 2023b	The Skills construction needs	Construction Industry Training Board

	Reference	Title	Journal/Outlet
19	CLC, 2016	The Farmer review of the UK construction labour model	Construction Leadership Council
20	CM, 2016	Construction firms warned about corruption and slavery	Construction Magazine
21	CM, 2017	Labour abuse watchdog extends its powers to construction	Construction Magazine
22	CM, 2018	Police anti-slavery drive on London sites	Construction Magazine
23	CN, 2018	Black market construction exposed: Where modern slavery starts	Construction News
24	CN, 2018 b	Bogus workers and the hidden threat of site card fraud	Construction News
25	CN, 2019	How I 'bought' slave labour in London: An undercover investigation	Construction News
26	CN, 2019 b	Slavery in the supply chain: A CN investigation	Construction News
27	CN, 2019c	CITB to review 2,500 tests after fraud arrests	Construction News
28	CN, 2019d	Revealed: Sites where modern slavery victims worked	Construction News
29	CN, 2020	Construction was modern slavery hotspot during lockdown	Construction News
30	CN, 2020b	Organised crime 'cashing in on demand for construction testing'	Construction News
31	CN, 2021b	13 arrested over modern slavery offences	Construction News
32	CN, 2022	Crime family faces prison after human trafficking of construction workers	Construction News
33	CN, 2024	Number of arrests for illegal working rockets	Construction News
34	DLME, 2020	Worker Voices in Construction	DLME
35	DLME, 2021	United Kingdom Labour Market Enforcement Strategy 2020/21	DLME
36	Flex, 2018	Shaky Foundations: Labour Exploitation in London's Construction Sector	Focus on Labour Exploitation
37	FMB, 2024	Supporting SME Housebuilders: Challenges and Opportunities	Federation of Master Builders
38	GB, 2016	Why the construction industry is most at risk for modern slavery	Growth Business
39	GLAA, 2018	The nature and scale of labour exploitation across all sectors within the UK	Gangmasters and Labour Abuse Authority
40	GLAA, 2020	Concrete - Tackling Modern Slavery in the Construction Sector	Gangmasters and Labour Abuse Authority
41	GLAA, 2020b	Construction Industry Headline Trends	Gangmasters and Labour Abuse Authority
42	Gowling, 2017	Slavery in the UK construction industry - a modern problem?	Gowling WLG
43	HBF, 2020	State of Play Challenges and Opportunities facing SME Home Builders	Home Builders Federation
44	HBF, 2021	State of Play Challenges and Opportunities facing SME Home Builders	Home Builders Federation

	Reference	Title	Journal/Outlet
45	HBF, 2023	State of Play Challenges and Opportunities facing SME Home Builders	Home Builders Federation
46	HBF, 2024	State of Play Challenges and Opportunities facing SME Home Builders 4th Ed.	Home Builders Federation
47	HBF, 2024b	The Economic Footprint of Home Building in England and Wales	Home Builders Federation
48	HBF, 2025	State of Play Challenges and Opportunities facing SME Home Builders 5th Ed.	Home Builders Federation
49	IASC, 2022	Operation Cardinas and Beyond: Addressing exploitation risk in the construction sector	Independent Anti-Slavery Commissioner
50	LEAG, 2024	"So I decided to carry on...": The continuum of exploitation in practice	Labour Exploitation Advisory Group
51	LN, 2016	Hidden In Plain Site Sight Modern Slavery in The Construction Industry	LexisNexis
52	NCE, 2024	Contractors take on modern slavery in their supply chains	New Civil Engineer
53	PBC, 2018	Tackling labour exploitation & modern slavery in London	Planning, Building & Construction Today
54	PBC, 2023	New Construct.id digital platform to enable easier construction credential checks and tackle modern slavery	Planning, Building & Construction Today
55	RIBA, 2018	Spotting the signs of modern slavery	Royal Institute of British Architects
56	RICS, 2017	Unfair game	Royal Institution of Chartered Surveyors
57	The Times 2024b	Building Keir Starmer's 1.5m homes 'will mean even more illegal workers'	The Times
58	The Times, 2020	Doubt cast on Priti Patel's workless army of millions waiting to retrain	The Times
59	The Times, 2024	Hitting 1.5m homes target 'will need illegal workers'	The Times
60	UCATT, 2018	Blacklisting Campaign Hits Parliament.	Unite Construction, Allied Trades and Technicians
61	UCATT, 2019	Tackling Exploitation: Confronting undercutting and exposing bandit capitalism	Unite Construction, Allied Trades and Technicians
62	UCATT, 2021	Time to organise our future	Unite Construction, Allied Trades and Technicians
63	UCATT, 2023	Builders Beware Sun and Heat Risk Safety	Unite Construction, Allied Trades and Technicians
64	Unseen, 2023	Annual Assessment 2023: Working Towards A World Without Slavery	Unseen UK
65	Unseen, 2023b	Modern slavery in construction is on the rise	Unseen UK
66	Unseen, 2023c	Frank's story	Unseen UK
67	UON, 2022	Developing anti-slavery guidance for SMEs	University of Nottingham

3. Interviews with stakeholders

The interviews aimed at corroborating our findings and complementing them, particularly around the identified gaps in the literature. Given that this research was commissioned by the Office of the Director of Labour Market Enforcement (ODLME), they compiled a list of suitable participants for us to interview. The ODLME has a professional relationship with these individuals. Our contact from the Office of the Director of Labour Market Enforcement (DLME) facilitated an initial introduction to invite participants to our study and briefly explained the research project. We followed up with an email formally inviting them to participate and explaining at length the project. The documentation (information sheet and consent forms) were shared with participants and interviews were organised using MS Teams. On one occasion, we used a snowballing approach to recruit an additional participant. Seven interviews were conducted between March and April 2025 with actors from the three labour market enforcement bodies under the Director of Labour Market Enforcement (DLME): the Employment Agency Standards (EAS) Inspectorate, the Gangmasters and Labour Abuse Authority, and the HMRC's National Minimum Wage Unit Enforcement Team, hereafter HMRC NMW. We also interviewed participants from the Home Office (HO) and the Health and Safety Executive (HSE). One representative from the DLME was also interviewed. Interviews lasted between 45 and 60 minutes. Interviews asked participants to elaborate on their agency's role considering the spectrum of labour exploitation, their understanding of modern slavery and related practices and the evidence they hold in relation to these in the construction and housebuilding sector. Interviews were recorded and transcribed in preparation to the analysis.

3.1. Analysis

To analyse the interviews, we used the template already generated for the systematic literature review and coded thematically the interview transcripts and complemented it with new codes. Participants were given the opportunity to review and verify the accuracy of their contributions. This step was vital to ensure that their views were represented faithfully and respectfully. All feedback received during this verification stage was carefully considered and, where appropriate, incorporated into the final analysis to enhance the integrity and authenticity of the findings.

4. Research Ethics

The primary data collection of this project (interviews) underwent ethical review at King's College London. (reference ID: LRS/DP-24/25-46701). The principles of informed consent, anonymity and confidentiality, have all been central to the research design and its ongoing delivery.

The Modern Slavery and Human Rights Policy and Evidence Centre (PEC) at the University of Oxford exists to enhance understanding of modern slavery and transform the effectiveness of laws and policies designed to address it. The Centre funds and co-produces high quality research with a focus on policy impact, and brings together academics, policymakers, businesses, civil society and survivors to collaborate on solving this global challenge.

The Centre is a consortium of three Universities of Oxford, Liverpool and Hull, and is funded by the Arts and Humanities Research Council (AHRC) on behalf of UK Research and Innovation (UKRI).

office@modernslaverypec.org

www.modernslaverypec.org

Author(s): Dr Gabriela Gutierrez Huerter O,
Dr Furqan Suhail, Dr Yazan Alzoubi

Published by: Modern Slavery and Human
Rights Policy and Evidence Centre,
University of Oxford

Publication date: 2025

©2025, Dr Gabriela Gutierrez Huerter O,
Dr Furqan Suhail, Dr Yazan Alzoubi.

This work is openly licensed under a Creative
Commons Attribution 4.0 International Licence
[CC BY 4.0](https://creativecommons.org/licenses/by/4.0/).

This work was supported by Modern Slavery
and Human Rights Policy and Evidence Centre,
University of Oxford [reference number:
R90817/CN009] from its grant from the
Arts and Humanities Research Council [grant
number AH/T012412/2].

Identification number of the publication:
PEC/2025/10

Our partners:



UNIVERSITY
of HULL

Wilberforce
Institute



UNIVERSITY OF
LIVERPOOL

Bonavero
Institute
of Human
Rights



Funded by:



Arts and
Humanities
Research Council