

Criminal use of property

# MODERN SLAVERY AND HOUSING

Cymru/Wales

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# What is Modern Slavery?

Modern slavery is a hidden crime, which according to the Global Slavery Index 2016 affects an estimated 136,000 people across the UK. Adults and children are exploited for financial gain through several means, including:

- **Sexual Exploitation** – Victims are deceived, coerced and/or forced to take part in sexual activity.
- **Labour Exploitation** – Victims are coerced to work for little or no pay under the threat of penalty.
- **Criminal Exploitation** – Victims are coerced/deceived into committing criminal acts under the threat of penalty.
- **Domestic Servitude** – Victims live and work in private households and are forced to work long hours undertaking a variety of domestic tasks for very little or no pay.

Victims are controlled through actions including threats, violence, deception and debt bondage. Sometimes a person may not identify as a victim or understand their rights.

## Who is at risk?

Anyone can be at risk of exploitation. Although there are a number of factors which may make a person more at risk, including debt, poverty, homelessness and mental health.

## What role does housing play?

Housing plays an important role in facilitating exploitation; it could be where the exploitation occurs, for instance, domestic servitude takes place in the private homes. It also is where victims are housed – often in poor conditions. Often exploiters will also use housing as a way of controlling their victims through charging extortionate fees.

In some instances, landlords have been held liable for their role in facilitating exploitation – see Operation Fort link <https://www.bbc.co.uk/news/uk-england-birmingham-51712547>



# Report your concerns

If you are concerned call:

- The Modern Slavery Helpline on 08000 121 700
- The Police on 101 or 999 in an emergency
- The GLAA on 0800 432 0804 for labour exploitation concerns.

## Identifying exploitation

There are several questions to ask when thinking about the link between housing and exploitation:

- Are the people occupying the property, those named on the tenancy agreement?
- Is there a frequent turnover of occupants?
- Is there evidence of poor living conditions, sub-letting or over-crowding?
- Have issues been raised in relation to the property e.g. refuse, anti-social behaviour
- Is the person paying fees different to the person occupying the property?
- Does a person try to pay large amounts of fees cash in hand?
- Are the occupants of the property in possession of their own passports, identification or travel documents?
- Does someone appear to be controlling the occupant's communication, movement and/or behaviour?
- Do the occupants of the property appear withdrawn or frightened?

For more information on preventing modern slavery, refer to the LGA Guide for Landlord.

<https://local.gov.uk/publications/tackling-modern-slavery-guide-landlords>

## Do

- ✓ Be aware of the signs of exploitation.
- ✓ Trust your instinct. If you spot something that does not feel right, it might not be.
- ✓ Visit <https://www.rentsmart.gov.wales> for more information and guidance.

## Don't

- ✗ Put yourself or any potential victims in danger. Instead, report your concerns.
- ✗ Think you are alone. Instead Get advice from the Police the Modern Slavery Helpline or the GLAA.
- ✗ Think anything is too small to report.

# Sexual exploitation – pop up brothels

## What is a pop-up brothel?

In recent years, the concept of “pop-up brothels” has been gaining popularity with those who proliferate the practice of prostitution. A pop-up brothel is one that operates at a particular property, usually residential, for a short period of time.

Organised crime groups use explicit websites and online bookings for hotels and short-term rental businesses to increase their profits, using vulnerable women by moving them through various pop-up brothels. A large number of women engaged in prostitution at these brothels are victims of human trafficking. Lured with promises of legitimate work or otherwise coerced into compliance, these women can quickly be moved from one location to another, making it difficult for law enforcement to locate and save them.

## Where is the exploitation happening?

Chiefly, in residential properties rented through letting agents, private landlords and even online booking companies like Airbnb and Booking.com, and hotels. The criminal gangs operate a ‘revolving door’, whereby the women are moved around different properties and locations.

## Who is being exploited?

Vulnerable women are being exploited; thought to be 85% non-UK nationals, followed by Britons. Frequently victims are exploited by criminals of the same nationality. Recent evidence suggests that Chinese, Romanian and Vietnamese potential victims of sexual exploitation are being advertised on **Adult Service Websites in Wales**. Websites like Adultwork and Vivastreet hold the majority of UK sexual service advertising where a myriad of advertisements enable Organised Crime Groups to hide and merge their activity by advertising and controlling sexually exploited victims around the UK.

Moving women between different locations can foster disorientation and isolation, reducing the likelihood that if they come into contact with external agencies such as police or support services, they have time or capacity to establish a relationship of trust to disclose that they are victims and seek help.





## Spotting the Signs

- These brothels are usually newly-acquired properties, often privately rented flats or houses
- Budget hotels or holiday properties are also sometimes used
- There could be limited activities usually associated with new people moving into a property, for example, no signs of removals
- Limited, or scarcely furnished homes, it might look like no one actually lives there
- Multiple women living at the address, or numbers of women being brought to and taken from the address by someone else
- Multiple vehicles visiting the property at any one time
- Many frequent visitors, usually male, who don't stay for long periods of time
- Neighbours reporting frequent male visitors at all hours of day and night, often using mobile telephones in the vicinity of a property? In pop-up brothels this method is used to direct prospective clients to the property.

Whether it's an Airbnb rented property, other private rental like short term lets, holiday rentals, or a hotel room. This is happening in Wales what follows is a sequence of events noted within one of our cases involving a pop up brothel:

1. In establishing the tenancy, the Lettings Agent has taken copies of a UK bank statement belonging to a 'tenant'. This bank statement was false.
2. In establishing the tenancy the Lettings Agent has taken a copy of a passport belonging to a 'tenant'. This passport was false.
3. In establishing the tenancy, the Lettings Agent has taken copies of a Visa showing indefinite leave to remain, belonging to a 'tenant'. This Visa was also false.
4. The tenancy was established, the property was used as a pop-up brothel.
5. Throughout the tenancy, the Lettings Agent accepted monthly rental payments in cash. On each occasion a different person attended the Lettings Agency in person to pay the monthly rent. The Lettings Agency kept no record at all of who attended the Lettings Agency to make these cash rental payments.

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# Letting and estate agents

## Verifications of prospective tenants:

Lettings agents need to recognise that failures to conduct effective checks don't just put their properties at risk of MSHT, but any criminal usage.

The NCA Operation Airbrush, was an investigation centred upon a Chinese national, setting up numerous property rentals for pop up brothels. He was able to do this as a result of the lack of due diligence to verify prospective tenants

<https://www.birminghammail.co.uk/news/midlands-news/chinese-mastermind-pleads-guilty-running-17052394>

Most lettings agents offset the verifications/due diligence checks of tenant applications to national verification companies. Lettings agents in Operation Airbrush typically managed the identification checks (obtaining photo ID) and also right to rent checks, but then outsourced all other verifications (credit checks, employment references, prior landlord reference checks).

As verification companies tend to work on commission and offer a range of packages ranging from very basic checks at the cheapest cost, to extensive checks at high prices, Landlords and Agent may be tempted to use the cheapest. Ultimately any risk falls on the letting agent so ensure your checks are meaningful. Minimal and poor checks weaken opportunities to identify any criminality or concerns that would be very simple to resolve thereby protecting you, your client and helping to prevent crime and exploitation.

## Preventing criminal use of property: Spotting the signs

- References provided directly by the tenant and accepted, no background checks conducted to confirm veracity.
- Be suspicious when a 'facilitator' provides ID and residence permits, but another party attends the lettings office and premises.
- Email addresses given that are clearly not legitimately linked to employers or being non-existent accounts that a simple Google email validity check would highlight.
- Fake employer references given to lettings agent. Conduct checks directly with the businesses via email on public access routes to the business. Checking emails addresses on the company website and calling the numbers attached. Do this rather than rely upon the tenant's information as you may be routed to emails and phone numbers under the control of the criminals.
- Check supportive documentation, such as utility bills – fraudulent documents can be identified without any specialist training – bank accounts and utility bills with mixed typeface, typing errors, erroneous line spacing and poor quality logos.

- Confirmation of tenant identity. Ensure that photo ID being provided electronically is always being confirmed against the physical presence of the 'tenant' attending to sign papers and take possession of keys.
- Be suspicious of various different persons attending agents offices to pay rent in cash.
- Follow up visits to rented premises: When only marketing the property on behalf of a landlord and not managing it further, Lettings Agents don't always conduct follow on visits to check premises in terms of condition, usage and occupancy. Often it falls to the landlord to conduct the checks. Ensure that you conduct follow up visits or advise your clients to do so. Do not give notice of follow up visits, this enables Organised Crime Groups to put measures in place to mitigate this.

**Right to Rent checks:** As of November 2020 Home Office introduced an online checking service which does allow landlords and lettings agents to check:

- Non EEA nationals with a current bio-metric resident permit/card
- EEA nationals and their family members with status granted under the EU Settlement Scheme
- Those with status under the points-based immigration system

**Right to rent checks from July 2021: important information for landlords - GOV.UK ([www.gov.uk](http://www.gov.uk))**

Many of the residence permits used in Op Airbrush were fake, so these checks would have picked them up had they existed then and would have proved to be an important limiting factor to the activities of organised crime.

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