

Tackling Trafficking in Human Beings and Forced Labour: Lessons Learned from the London 2012 Olympic Games

Introduction

This short paper provides an overview of the key lessons on how to minimise the risk of trafficking, forced labour and labour exploitation associated with the staging of a major international sporting event. It draws on the experience of Anti-Slavery International, the Human Trafficking and London 2012 Network (hereafter the Network), other reviews of the London Olympics and interviews with key informants who were invited to reflect on their experiences of the Games.

Methodology

This paper was compiled by Anti-Slavery International from the evaluation of its projects targeted and related to the Olympics, participation in the Network and reviews of existing reports on the efforts to implement the ethical delivery of the Olympics. Several interviews were also conducted with key participants who had been involved in different aspects of formulating and implementing plans to reduce trafficking and forced labour associated with the games.

Strengths of this report

This report provides a brief overview of the lessons relating both to efforts to reduce trafficking in the UK and in the supply chain of the Olympics. Hence it provides a more concise overview of the totality of the issues and draws some key lessons for future games or major sporting events.

Key lessons learned

Importance of multi-agency working – Human Trafficking and London 2012 Network

An innovation that has been universally praised by informants was the establishment of a multi-agency Network formed of some 60 organisations to consider the risks of trafficking associated with the mounting of the London Olympic and Paralympic Games. The London 2012 Human Trafficking Network (the Network) was comprised of a selection of

governmental and non-governmental organisations and agencies working on different aspects of trafficking, including prevention, prosecution, campaigns and victim support. The Network operated between March 2010 and October 2012 under the auspices of the Mayor's Office for Policing and Crime.

The Network was coordinated through a steering group that was established on a principle of equality of relations on the working group between governmental and non-governmental actors to coordinate the development and execution of a work plan to minimise the risks of trafficking for sexual exploitation and forced labour. Specific actions to fulfil the workplan of the Network were taken forward by two sub-groups, one on trafficking for sexual exploitation (chaired by the Poppy Project) and another one on forced labour (chaired by Anti-Slavery International).

The work of the Network was subject to independent evaluation, which is regarded as good practice. The independent evaluation of the Network has concluded that: “[it] added considerable value by facilitating coordination among stakeholders and avoided duplication by ensuring that members periodically reported back to the whole network on their activities.”¹ The combination of a wide range of actors that brought together a wealth and breadth of experience was also deemed cost-effective by the evaluation.

Police noted the importance of this group in establishing a credible risk management system. The inclusion of social services and civil society in the working group was important for identifying both the substance of the risk and the appropriate nature of the response. The model of this network was very positive, because it was time-limited, it was highly focused, and the presence of many actors, both NGOs and governmental bodies, provided a balanced perspective on the issues.

Policing the games

Police describe their response to trafficking in the Olympics as a "*business as usual response*". That is the Olympics was a driver to the thinking and planning of core business rather than being event specific. One informant stated that “90%” of what was done was not related to the event and stated his opinion that this is how it should be because, in trying to

¹ Human Trafficking and London 2012 Network. An evaluation by GLE. GLE. London, 2013. p.26

deal with the issue of trafficking in a more holistic manner, it was possible to have both a greater and more sustainable impact on the problem. However they went on to say that it is critical in the run up to big games to understand current gaps and risks and to plug them, the implications being that those gaps and risks would be exacerbated with such events. As noted above the establishment of a multi-agency working group on this was important in the identifying key risks and appropriate responses.

However police note that over the course of the Olympics they found only one case where there was solid evidence of trafficking for sexual purposes specifically for the Olympics. Police had been prepared for a spike in trafficking, but this did not appear to bear out.

During the games the referrals of children to social services actually went down. It was reckoned that this was probably a collateral effect of the policing of the Games: that is because there was such a high police presence on the streets to deal with the policing needs of the Olympics that it deterred a wide variety of crime.

While noting that the dynamics associated with other sporting events may be different given their different economic, social and geographical contexts, one police informant argued that there are a couple of key questions for all events. First: *how do social services and police link to civil society?* And second: *does the existing response to trafficking look sufficient given the risk assessment that emerges from a joint police-civil society- social services analysis?*

Added value: Balanced focus on all forms of trafficking

It was recognised by all stakeholders involved that in London, for the first time in relation to a major sporting event, significant emphasis was put on tackling trafficking for forced labour. There was a common agreement that the risk of forced labour is potentially higher, as it is known to occur in certain industries, such as services, cleaning, catering, where there is a demand for cheap temporary labour. To organise a major event, many of these industries would be involved and/or would see the business opportunity and consequently would seek additional labour.

With previous big international sporting tournaments, there was a tendency amongst some sectors to “inflate” the risks associated with sexual exploitation. The Network in London

addressed these concerns by establishing two dedicated working groups addressing sexual and labour trafficking.

A number of responses were put into place to address sexual exploitation. For example, a 24 hour referral for street workers was set up to allow for them to be dealt with without arrest. However this did not work particularly well because so many police officers were working on the Olympics hence the number of arrests of street workers went down during this period.

Another initiative was a Metropolitan Police hotline, advertised in a taxi sticker, produced by Stop the Traffik in collaboration with the Metropolitan Police on what to do if trafficking occurs. This was used in cities outside of London. There was also targeted advertising in hospitals, among certain community groups and key service providers.

Within the UK there is strong anecdotal evidence of risks of forced labour in construction, domestic work, cleaning, catering and hospitality. These are sectors which are not as well supervised as agriculture and food, which comes under the remit of the Gangmasters' Licensing Authority, and was perhaps, at least initially, a lesser concern than trafficking for sexual exploitation for many responsible for putting on the Games. However it was not initially recognised by LOCOG that the GLA puts in place additional requirements on food suppliers to use licensed Gangmasters.

The Staff Wanted Initiative, a joint project between Anti-Slavery International and the Institute for Human Rights and Business that aims to combat forced labour, trafficking and exploitation in the UK hospitality industry was launched with the specific aim of bringing this industry's attention to these issues using the spotlight the Games shone on London.

The police commended this Initiative, particularly for identifying the risk and, as a result of the manner of its engagement with business, and for providing a useful model of working for business through the 'SEE formula'. It helped business identify who is controlling cheap labour, how is it coming in and are they getting paid. Here in particular civil society informants noted the importance of being able to work in partnership with police as it helped with engagement with the hospitality sector not only on the issue of procurement but also on issues such as law, risk assessment and security. The Staff Wanted Initiative facilitated the police's engagement with hotel security officers and security managers on sensitisation

around risks of forced labour in hospitality operations and have posted the SEE formula on the Police Knowledge Database used by all police forces in the UK.

In addition, a specific piece of work to inform migrant workers about their rights, signs of forced labour and where to turn for help was led by Anti-Slavery International in consultation with migrant rights organisations.

Postcards informing workers about the *rights and wrongs* were produced in 7 languages and distributed to migrant rights organisations. Furthermore, they were also distributed by the UKBA staff at six UK ports (including one seaport) during the Olympic Games.

Engagement with London Organising Committee of the Olympic and Paralympic Games (LOCOG)

Playfair 2012 was a campaign that aimed to “*influence the policies and practises of major sportswear brands and the organisers of the London 2012 Olympics to ensure respect for International Labour Organization Conventions and workers human rights in their global supply chains*”².

It was noted by informants that, in the early days following the winning of the bid to host the Olympics, it was difficult for Playfair to engage with LOCOG on concerns about issues relating to its concerns relating to the supply chain or operations of the Games. It was suggested by one informant that the mammoth scale of mounting the Games without taking into account previously unconsidered issues, such as forced labour risks, was so daunting in itself that LOCOG officials were unwilling to take up additional challenges.

Engagement regarding the forced labour and labour exploitation risks had started with the bid process, which many members of Playfair, such as the UK’s Trade Union Congress (TUC) had supported. However at the outset, it was noted by informants, that there seemed amongst LOCOG officials a sense of that it would be close to impossible to change anything regarding the accepted procedures for implementing a games of this scale.

² Impact Study: Playfair 2012 Project and Campaign by Louise Marix Evans for the TUC and Labour Behind the Label, Dec 2012

It was observed that difficulties in obtaining action from LOCOG on social issues, including labour rights, principally arose due to lack of understanding of those issues by many in LOCOG. It was noted that while LOCOG officials displayed considerable understanding of environmental and sustainability there was little to no appreciation initially of human and labour rights issues.

There was also “limited leadership” by the International Olympic Committee (IOC) on the issue of labour rights and hence no direction to national organising committees on what was expected of LOCOG on these issues. IOC did give direction on sustainability and environment which were taken seriously by LOCOG, but not on labour rights, which were not taken seriously at the outset

Discussions around scenarios associated with issues such as forced labour that might tarnish the image of the Games helped make officials more receptive. However it was noted by informants that a sea change in the quality of engagement and a sense of urgency by LOCOG on the issues did not occur until The Sun newspaper in 2012 published the results of an investigation that indicated the presence of forced labour in the supply chain for goods for the London Olympics and Playfair 2012 published its second report detailed a series of abuses in factories supplying LOCOG.

The shift from hypothetical risk to actual scandal finally galvanised action by LOCOG to collaborate more meaningfully with partners to establish a credible complaints and scrutiny mechanism on the Olympics supply chain.

Timely formation of a response to supply chain concerns

In late 2010, with support from Labour Behind the Label and the Trade Union Congress (TUC), LOCOG agreed to a Complaint and Dispute Resolution Process with an independent Stakeholder Oversight Committee to handle grievances about non-compliance with its Sustainable Sourcing Code.

LOCOG commitments to establishing this sort of scrutiny of its supply chain were highly significant in terms of accepted good practice around establishing ethical supply chains and in establishing an example and precedent for other major international sporting tournaments. It was a recognition that “ethical audits” were an ineffective way to monitor compliance in

supply chains and hence an acceptance of the arguments put by Playfair on the need for additional safeguards for workers rights. However in retrospect it was probably this Process was too late in the day to have been optimal in minimising forced labour and labour exploitation risks on the Olympic supply chains, and it was not communicated to workers in those supply chains until 2012.

Very positively the standards established for supply chains were based on the code of the Ethical Trading Initiative (ETI). Procurement contracts required suppliers to adhere to the ETI's Base Code. A complaints procedure was agreed and established, but this was not as well publicised amongst the workers of the supply chain as would have been ideal. This was at least in part because many companies supplying the London Olympics were very reluctant to disclose their supply chains. Ultimately 73% of these supply chains were disclosed. But there was no opportunity for training of supply chain workers on their rights or on the complaints procedure that had been established, though some training materials were available in Chinese.

It should also be noted that the decision to establish a Stakeholder Oversight Committee of five "experts" drawn from business and civil society to oversee the Process was an extremely important move to bolster the capacity and credibility of the Process.

Conclusions

Building trust

The stakeholder interviews conducted in the course of writing this report revealed that some of the processes established, such as the Stakeholder Oversight Committee of the Complaint and Dispute Resolution Process, and the multi-agency Network, seem to have developed a significant level of trust amongst actors. This is alluded also in other reports reviewed. If built upon, both for future sporting events and the ongoing challenge of tackling trafficking, this could be a very positive legacy of the Games as the conversations and collaborations between these actors can help develop effective measures to respond to trafficking and forced labour.

The potential of the International Olympic Committee (IOC)

Informants note that in the run up to the Games there was little engagement with the IOC by Playfair. This was identified as a result of limited networks and capacity to do so.

Given the level of leadership that the IOC exerts in relation to the mounting of Olympic tournaments it is essential that for the lessons of London to be preserved and built upon that the IOC take on board these lessons, promote them to other tournaments and ensure that they are replicated in future Olympic Games.

In order to advance this objective it was suggested that all those involved in Playfair should engage with national sports federations and individual members of the IOC who may have the potential to develop the IOC's awareness of and commitment to combat forced labour risks.

Tackling domestic risks of trafficking

As noted above the multi-agency approach to dealing with trafficking was universally praised by the informants interviewed in the process of preparing this report. It contributed to better policing of the Games, and had some impact on development of the UK's government policy towards dealing with trafficking. The UK police have indicated their willingness to share their policing methodologies for big sports tournaments and lessons learned with other forces around the world.

Were governments to use this multi-agency approach to more systematically identify risks and responses then perhaps the impact of such an approach could be accentuated. For example in future major sporting tournaments particular risks to trafficking and forced labour may derive from specific policies of the host government which should be changed to reduce risks. For example even before Qatar was awarded the 2022 World Cup there was already considerable concern about the Kafala system of tying workers' visas to particular employers. In the preparations for the World Cup this system will provide an exacerbated risk of trafficking.

Supply chains

The globalising nature of business means that many business supply chains now extend into poor and undemocratic countries where corruption is high, rule of law is poor and hence labour rights abuses are rife. It is inevitable therefore that in the contemporary world mounting a major sporting event will bring with it the substantial risks of forced labour in the supply chains of the event.

Crucially the London Games has educated a significant group of sports officials on the issues and provided a set of models on how such risks can be mitigated. It would be a highly significant legacy of the Games if these models are built upon and integrated into future games.

Crucial to these efforts towards reducing the risks of forced labour and trafficking associated with such events, is to establish robust and transparent mechanisms to scrutinise supply chains and to introduce effective remediation where abuses are identified. A pre-requisite for achieving this is the disclosure of Games partners' supply chains, and in future such disclosure should be written into Olympics contracts.

Recommendations for tackling the risk of trafficking and forced labour related to major sporting events

- **Set up a time-bound multi-agency committee, with participation on equal footing to work on addressing the risks. The work of the committee should be executed based on a workplan, with concrete deliverables and clearly defined responsibilities of all stakeholders.**
- **Ensure that all forms of trafficking as well as forced labour in the supply chains for the events merchandise receive equal attention.**
- **If the venue is in a major city, secure the support of the Mayor.**
- **Ensure early engagement with the International Olympic Committee and the event delivery agency.**
- **Ensure that measures such as complaints mechanisms for workers, hotlines and standard operating procedures for multi-agency response are in place in good time before, during and after the major sporting event.**