Under the radar? Modern slavery and labour exploitation risks for the hotel industry

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ABSTRACT

The UK's tourism and hospitality industries, having the highest concentration of migrant workers compared to other industries, face complex challenges in managing the risks of labour exploitation and modern slavery (MS); issues largely neglected in academic research. New employment models risk weakening workers' power in employment relations, potentially leading to increased vulnerability and exploitation risk. Based on analysing primary and secondary sources, this article examines the nature of these risks. Our findings show the following drivers: power imbalances; possible enforcement gaps; normalisation and moralisation of possible exploitation; and potential threats posed by macro-level political and socioeconomic issues/events; these, including more competitive labour markets, paradoxically also present opportunities. We develop significant, novel theoretical contributions and propose the new '(in)conspicuous exploitariat' concept, encapsulating their (dis)empowerment, and potential future risks/opportunities. The research advances theory, with implications for policy and practice, for both the UK and the international tourism and hospitality industries.

1. Introduction

This research aims to analyse the nature and drivers of, and responses to, labour exploitation and modern slavery (MS) in the tourism and hospitality industries (Ndiuini & Baum, 2021; Robinson, 2013), focusing on the United Kingdom (UK), but clearly with wider international relevance. For the International Labour Organisation (ILO, 2022), MS encompasses forced labour, while MS in UK anti-slavery legislation covers human-trafficking, slavery, servitude, and forced labour (Cooper et al., 2017). Distinguishing forced labour in MS from exploitation is practically difficult (Potter & Hamilton, 2014; Scott et al., 2012), with a forced labour *exploitation continuum* (Potter & Hamilton, 2014; Skrivankova, 2010), illustrating MS risks in the UK tourism and hospitality industry (Armstrong & Matters, 2016). People may experience forced labour indicators, contexts, practices, and outcomes without necessarily being legally classed as forced labourers. The continuum applies from normalised low pay and precarious working conditions and practices to severe migrant labour exploitation (Lewis et al., 2015), all longstanding

concerns of tourism and hospitality industry analysts (Baum, 2006, 2007, 2015; Baum et al., 2016, 2020; Hack-Polay et al., 2022; Joppe, 2012; Lugosi & Ndiuini, 2022; Ndiuini & Baum, 2021; Robinson et al., 2019).

The UK government recognises the significant scale of exploitation (HM Government, 2014); with decades of activist pressure strengthening initiatives to tackle labour exploitation, protect worker rights, and regulate business (Allain et al., 2013; Balch, 2015; Carrington et al., 2021; LeBaron & Rühmkorf, 2019); yet, fundamental institutional misalignments and governance gaps remain for MS (Hampton, 2019). Forced labour, historically considered a development issue (Balch, 2015), focuses on Global South value-chains rather than Global North domestic supply-chains (Crane et al., 2019; Lewis et al., 2015); and human trafficking, rather than MS (Broad & Turnbull, 2019; Paraskevas & Brookes, 2018). Although research studies (Allain et al., 2013; Anderson, 2010; French, 2018; Harvey et al., 2017; Scott et al., 2012; Skrivankova, 2010) analyse MS and labour exploitation in UK domestic supply-chains, risks facing the tourism and hospitality industries are

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largely neglected in academic research (Jones & Comfort, 2021); with calls to researchers to expand knowledge about this growing issue, especially in terms of hospitality suppliers, their practices, and MS labour usage (Lugosi, 2019; Robinson, 2013).

The tourism and hospitality industries are often characterised as dominated by casual, short-term, precarious, low-skilled work, justifying low-wages while disregarding soft-skills (Baum, 2006, 2007, 2015; Janta et al., 2011). It is an important starting point to address these issues, with the highest concentration of migrant workers; and, for example, the fifth-largest industry in the UK (French, 2018; Anti-Slavery International, 2022). The tourism industry's importance gives it a platform to inform planning, policy and practice in addressing tourism and labour migration, MS and exploitation. This needs to be an informed platform acknowledging the problem, taking cognisance also of tourism literature noting how tourism commands proportionately less influence than its socioeconomic contribution and size of migrant workforce would suggest; with less critical connection between tourism's theoretically-grounded studies and policy and planning influence than would be expected (Hall & Page, 2009). Research has not addressed how recent socioeconomic and political trends may pose increased risks for exploitation drivers facing tourism and hospitality employers. The extent MS risks are associated with particular groups of workers (e.g. migrant workers), remains unclear. Hence we respond to recent calls for more tourism and hospitality research on MS (Jones & Comfort, 2021; Lugosi, 2019). Through critically examining conceptual debates and multifaceted socioeconomic and political forces, we seek to advance both theoretical and practice-oriented understanding of this sensitive phenomenon to better inform policy-makers and employers and mitigate potential risks.

We adopt a qualitative approach based on analysis of primary and secondary data to unravel and understand the issues. First-hand knowledge of pertinent issues in hospitality and tourism require in-depth interpretive, multidisciplinary research (Ladkin, 2011). The hospitality and tourism industries can be complex and problematic to regulate, involving an array of activities combined with dynamic workplaces, size, location, and seasonal employment patterns (French, 2018). We contribute to the tourism literature and extant conceptual understanding, providing recommendations for policy and practice, by identifying and examining the nature, drivers of, and responses to the exploitation risks faced by the tourism and hospitality industries, and especially hotel-chains, and how these are shaped by socioeconomic and political trends. We do this through asking pertinent, exploratory research questions in this under-researched area.

2. Literature review – routes and responses to the risks of modern slavery (MS) and labour exploitation

This section discusses MS and labour exploitation risks in UK domestic supply-chains, related to deregulation, hyper-flexibility, migrant workers, hospitality and tourism. With concerns in the literature about ineffective or inconsistent regulation, we focus on the UK, claiming to be the first country outlawing MS by implementing the UK Modern Slavery Act 2015 (the Act). This policy achievement makes the UK worthy of further examination, especially as Field et al. (2019) and Carrington et al. (2021) detail the MS Act's limitations; and Broad and Turnbull (2019) show, despite some policy-focus shifts, migrant workers are still marginalised/excluded from UK government support strategies. The focus specifically on the UK hotel sector is also supported historically in the literature by critiques of its labour relations shortcomings (Lucas, 1995, 1996; Wood, 1997).

2.1. Deregulation and hyper-flexibility

It is argued in the literature that light-touch business regulation in the UK, encourages hyper-flexible labour market growth, partially leading to non-standard, precarious work (Allain et al., 2013; Harvey et al., 2017); with growing deregulation eroding workers' collective power, pay and working conditions (Hodkinson et al., 2021). French (2018) argues that, with weak regulation, employers increasingly utilise casualisation strategies, with third-party labour providers, worker self-employment, and zero-hour contracts, taking advantage of numerical and financial flexibility. Tourism and hospitality are also noted for their fragmented nature of work and deployment of cheap labour (Baum, 2007, 2015).

Employment legislation covering worker rights and employers' obligations should not be overlooked, and how key labour standards are covered, and existing legislation enforced. Allain et al. (2013) argue that UK employment law, for example, tends to regulate trade union and employee activities in detail, but limits employer regulation oversight. For Balch (2015), this ignores demands from non-governmental organisations (NGOs) for more robust business regulation, rather than non-binding codes of conduct. Certain workers, like migrants, may also not have the same employment law protections (Skrivankova, 2010), while with hyper-flexible labour and precarious workplaces arguably increasing, enforcement bodies, like the Health and Safety Executive, Gangmasters and Labour Abuse Authority (GLAA), and Human Rights Commission, may not have resources needed to fulfil all responsibilities like workplace monitoring (French, 2018).

2.2. Migrant workers

Previous research underscores migrant workers' precarity (Anderson, 2010; Crane et al., 2019; French, 2018; Hodkinson et al., 2021). Their economic circumstances, often limited language ability, widespread tied housing usage, and reliance on gangmasters, may render them vulnerable to labour exploitation and MS (Allain et al., 2013; Kenway, 2021; Scott et al., 2012).

Potter and Hamilton (2014) assert that migrant workers can face a potential exploitation continuum, their immigration status creating perceptions of unequal power relationships with employers; temporary worker classification making them more reliant on employers, with their status 'the prime generator of vulnerability' (Potter & Hamilton, 2014, p. 403). Anderson (2010) argues that immigration controls presented as prioritising the national labour force, while protecting migrants from exploitation, may achieve neither. Precarious low-waged migrant workers' situations can include both potentially abusive employers, labour markets, and prevailing immigration controls. More precisely, immigration controls may define migrants as illegal or legal in particular ways (Anderson, 2010; Crane et al., 2019). Immigration policies with work restrictions may have unintended consequences and create structural vulnerabilities (Allain et al., 2013; Potter & Hamilton, 2014), resulting in potential migrant worker vulnerability to labour exploitation and MS.

2.3. Modern slavery, labour exploitation and the hospitality and tourism industry

Geddes et al. (2013) call for more detailed research into what is happening in the UK labour market, especially in arguably high-risk industries like tourism and hospitality (French, 2018). Although research provides some evidence of how migrants may be compelled, coerced, and confined in exploitative working conditions (French, 2018; Lewis et al., 2015; Scott et al., 2012), risks of labour exploitation, MS, and forced labour in tourism and hospitality have been largely neglected in academic research (Jones & Comfort, 2021).

Skrivankova's (2010) continuum of exploitation goes from decent work to forced labour. Tourism work often involves long hours, insecure employment, low wages, inadequate schedules and few progression opportunities (Baum, 2015). It does not always operate on decent work principles, affecting how dignity in tourism and hospitality employment can be experienced (Baum, 2018); and how dignity at work is managed (Baum, 2006).

Winchenbach et al. (2019) stress the need to critically engage with theorisations of decent, dignified work and its relevance for the tourism and hospitality industries (Winchenbach et al., 2019). This links to the ILO's socially responsible tourism guidelines for decent work (ILO, 2017), with targets of non-discriminatory work-environments, fair wages and working-conditions, worker involvement and work–life balance. The ILO (2017) suggests establishing codes of practice and policies to promote decent work, especially in the informal sector of the tourism industry, where prominent deficits often include low wages, extended working hours, and limited social protection.

Significant proportions of the low-skilled workforce in the hotel industry are migrant workers who may be particularly vulnerable to potential abusive practices (Anti-Slavery International, 2022). Labour exploitation and MS tend to be concentrated in low-technology and labour-intensive industries with spatially fixed supply-chains (Crane et al., 2019; Harvey et al., 2017; Scott et al., 2012); and the hotel industry relies heavily on labour suppliers for outsourced housekeeping staff. Hotel-chains can involve large-scale, multi-tiered, complex franchising with varied actors and supply-chains involved in operations. The hotel industry's layered structure, and multi-tiered recruitment system, can make exploitative practices challenging to detect (Human Trafficking Foundation, 2018; BHRRC, 2019; Anti-Slavery International, 2022).

Internationally, despite being identified as high-risk, limited compliance is observed from hotel companies with MS regulation requirements (BHRRC, 2019). Assessing 71 hotel companies' compliance with the Act, only 25% of hotel companies were found to meet minimum requirements (less than the 30% compliance found across all industries). 68% failed to disclose information about risks in their operations and supply-chains (BHRRC, 2019). Reviewing MS statements in a study published by leading UK hotel companies, it found addressing MS in their supply-chains was 'expectational', raising concerns about auditing processes employed and limited public reporting of their attempts to tackle MS (Jones & Comfort, 2021). Existing academic and other studies argue that a substantial proportion of such large companies are underperforming (BHRRC, 2019; Jones & Comfort, 2021).

Filling evident literature gaps, we address the following research questions: (1) What are the drivers of, and responses to, the risks of labour exploitation and MS for UK hotel-chains? (2) How are these risks potentially influenced by social, political and economic trends and organisational factors? (3) What is the nature of private and public regulation of the risks of exploitation for UK hotel-chains, and how can these be potentially improved?

3. Methods

3.1. Research design

We adopt a qualitative approach, using collated primary and secondary data sources to unravel and understand potential risks of MS and labour exploitation faced by hotel-chains. Multiple data sources (triangulation), the hallmark of designing research to ensure rigour, reduce risks of the overall analysis being influenced by particular methods' limitations, with each data source contributing to understanding the phenomenon being studied (Harrison et al., 2017). To help mitigate potential limitations with the methodological approach, which were identified as including potential bias that may occur as a result of the different nature of the stakeholders' interests of those interviewed for the primary research, we ensured that a broad sampling strategy was adopted to complement the triangulation. Evidence was therefore collated from a range of different perspectives to represent different arguments, issues and groups.

3.2. Data collection

After obtaining ethical review and approval for the research project,

our primary data collection consisted of semi-structured interviews with actors (N = 23) with relevant professional experience, or knowledge about issues related to the research problem (see Table 1). The time period for data collection spanned a period of approximately 20 months (during 2022 and 2023). We drew on a 'key informant' approach as interviews are useful for collecting in-depth, rich data about experiences, attitudes, and perspectives of representatives of different informed stakeholder groups. Interviews focused on the nature of vulnerability within the hotel industry and how it varies, exploring participants' views on the socioeconomic and political factors potentially causing or exacerbating vulnerability. They considered views on responses to exploitation – both private and public – and experiences of working to prevent labour exploitation and MS.

Stakeholders fell into five primary groups: The first comprises hotel industry representatives and those supplying labour (N = 4), including hotels chains and hotel trade associations/membership organisations, to understand their experiences and views about MS and labour exploitation. Stakeholders include representatives of 'umbrella' groups seeking to support UK tourism and hotel industries and sustainable and responsible practices within these industries, including representatives of hotel groups themselves. The second comprises representatives of regulatory bodies (N = 2), occupying senior positions, and knowledgeable about regulatory and associated concerns for MS. The aim was to examine the nature and risks of possible exploitation, understand experiences of work being undertaken or planned, perceived outcomes, and facilitators and barriers of working in this area. Third, we interviewed policymakers and others working in relevant national and local government departments (N = 2). This enabled collation of expert views on how policy developed over time, the nature of relevant policy, and drivers and facilitators of policy development and practice. The fourth group comprises academics, private consultants and representatives of 'think tanks' (N = 5) with expertise in labour exploitation and MS to elicit their views on potential drivers of exploitation, what is known about the nature and responses to risks of MS and labour exploitation, and knowledge gaps. The fifth group comprises third-sector organisations and charities (N = 10) with experience of working directly with people who faced labour exploitation and MS. They enabled us collate

Table 1
Overview of interviewees.

Code	Position	Stakeholder group
1nv-01	Director	Academics/Consultants
Inv-02	International Change Director	Third-sector/Charities
Inv-03	Modern Slavery Analyst	Third-sector/Charities
Inv-04	Deputy Team-Manager	Policymakers
Inv-05	Professor	Academics/Consultants
Inv-06	Civil Servant	Policymaker
Inv-07	Chief Executive	Third-sector/Charities
Inv-08	Professor	Academics/Consultants
Inv-09	CEO	Third-sector/Charities
Inv-10	Chief Purpose Officer (Human Rights Specialist)	Hotel-Chains
Inv-11	Senior Programme Manager	Third-sector/Charities
Inv-12	CEO	Third-sector/Charities
Inv-13	Research Officer	Third-sector/Charities
Inv-14	Business and Human Rights Consultant	Third-sector/Charities
Inv-15	Professor	Academics/Consultants
Inv-16	Independent Consultant	Academics/Consultants
Inv-17	Head of Migrant Workers/Human Rights Specialist	Third-sector/Charities
Inv-18	General Manager/Senior Policy Advisor	Hotel-Chains/Policymakers
Inv-19	Human Trafficking & MS Caseworker/Advocate	Third-sector/Charities
Inv-20	Regulatory Body	Regulatory Body
Inv-21	Regulatory Body	Regulatory Body
Inv-22	CEO	Hotel Trade Association
Inv-23	Head of Social Responsibility	Hotel Trade Association

views from those with first-hand experience of those facing exploitation; examine perceptions of how policy effectively, or otherwise, deals with labour exploitation on the ground; and consider perspectives regarding whether exploitation could be better dealt with in statutory and non-statutory areas.

Determining the sample followed an iterative process with the following steps: (1) drawing together a list of organisations to invite to participate; (2) identifying key contacts within those organisations; (3) inviting contacts to participate; (4) reviewing and updating the list. We ensured robust sampling strategies, acquiring a range of stakeholder views.

In addition to the primary interviews, the research also collected and conducted a textual coding analysis of secondary sources comprising publicly-available industry and policy documents and reports. We conducted a targeted search using specific keywords to define our sample. Keywords included 'labour exploitation', 'migrant labour', 'modern slavery, 'forced labour', 'bonded labour', 'trafficking', 'modern slavery act' and 'supply-chains.' Resources were retrieved from government websites, including Gov.UK, Gangmaster & Labour Abuse Authority (GLAA) and Local Government Association. We also collected resources from relevant CSO and NGO websites, like those of the Business and Human Rights Resources Centre and Walk Free Foundation. Each document was read by a researcher and then cross-checked with other research-team members to determine its relevance for inclusion. Citations of related documents were retrieved and checked manually. We continued this process until saturation, when no more sources were found. Table 2 shows how the final sample encompassed 128 documents: national MS and other labour issues statistics reports (17), review of MS risks and responses (16), guidance on scope, definition and causes of MS in the UK (22), and hotel companies' most recent MS statements (70). Regarding the latter, the UK MS Act requires companies with a turnover of £36 million to release annual statements regarding their anti-slavery efforts. The Modern Slavery Statement Registry sorts all reports released by firms affected by the legislation. We retrieved and manually checked the most recent statements released by all hotel companies on, and submitting statements to, the register.

3.3. Data analysis

We used the thematic analysis method to identify, analyse and report patterns (themes) within the data (Braun & Clarke, 2022). Thematic analysis helps researchers make sense of research participants' various perspectives, highlight similarities and differences, and generate insights. Following Braun and Clarke's thematic analysis method, we carried out close reading of interview transcripts and secondary documents, then thematically coding the collated data set, moving recursively between data sources iteratively in line with our inductive approach. As such the analysis was carried out concurrently throughout the fieldwork process, with the latter more intensive thematic coding phase taking approximately eight months.

Generation of codes from data was facilitated by Nvivo 12. We coded identified text sections, attaching thematic labels to them. We worked systematically, ensuring codes had explicit boundaries and were not exchangeable or redundant. A codebook including code definitions and example quotes and data segments was created (Nowell et al., 2017).

Table 2
List of Secondary Sources of Data published between 2015 and 2022.

Code	Type of documents	Number of documents retrieved
STA	National MS and other labour issues statistics reports	17
REV	Review of MS risks and responses	19
GUID	Guidance on scope, definition and causes of MS in the UK	22
STM	Hotel companies' most recent MS statements	70

Data analysis was conducted by two researchers, further enhancing reliability. After all data were collated and initially coded, data extracts were sorted and collated into themes. A theme is a significant construct that could link substantial data portions and relates to the overall research question. Following an inductive approach, themes were strongly linked to the data (Braun & Clarke, 2022). Coded data extracts for themes and sub-themes were reviewed to check coherence and how each theme related to the overall data set and research questions. The analytic scheme emerging from our analysis (Table 3) is used to structure our findings in the next section.

4. Findings

In this section we provide our findings and critically examine the nature of the risks of MS and labour exploitation for UK hotel-chains and the hospitality industry.

4.1. A high risk industry?

From our findings, arguably hotel-chains appear high-risk for MS due to their potentially vulnerable workforce, supply-chains, the arguably fragmented nature of franchising, oversight challenges, use of localised, informal purchasing agreements and seasonal temporary working agreements (REV-15). Thus, the vast range of suppliers with issues that potentially link them to MS, are in industries like construction, food and clothing. Hotels are key actors/users of such suppliers, with resulting potential risk. Yet, attention to risks of MS could be more explicit than is apparently the case according to some of those interviewed:

> In terms of the hotels themselves, I don't think we've had too many scandals yet … That's just, a bomb is waiting to explode, because we know it's pretty heavy in say the hospitality industry in general, there is plenty of modern slavery happening (Inv-08).

Participants explained how larger hotel-chains may have recognised that MS and exploitation are major risk factors, although no 'big scandal' has yet brought it to enough light. Inv-22 discussed the importance of encouraging 'human rights' and 'ethical recruitment', due to the significant 'reputational risk' to hotels, citing a 'signature' hotel in another country where it was found that they had 'four modern slaves working in their company.' For Inv-21, 'there are huge risks … it will only take a major investigation to turn the spotlight onto the hotel industry … that will show up a lot of weaknesses in how they have approached it to-date.' They felt the need for more empirical evidence on the extent that MS, particularly forced labour, is a problem; arguing that structural issues undermine workers' ability to effectively demand their rights, potentially fuelling risks of forms of exploitation, if not appropriately addressed.

Table 3
Emergent analytic scheme: Thematic analysis.

Key Master Themes (Codes)	Constituent Sub-themes (Sub-codes)
A high-risk industry?	
Risks of power imbalances	Absence of a joint workforce
	Scarce opportunities to organise
	Reported sentiments of fear
Risks of possible enforcement gaps	Public and individual enforcement
Risk of normalisation and moralisation of possible exploitation	Risk of normalised exploitation
	Risk of moralising exploitation: Apocryphal Stories
Macro-level historical developments and the UK macro-policy framework: Opportunity or setbacks?	

4.2. Risks of power imbalances

4.2.1. Absence of a joint workforce

Hotel-chains' business/ownership models appear highly fragmented. MS statements analysed showed how hotel-chains can adopt leased/joint venture structures, with hundreds of thousands of franchise employees working on-property at independently owned and operated franchised properties. This creates a 'complexity of ownership' which can impact MS risks regarding 'who owns this responsibility' (Inv-22). In 2019 the Director of Labour Market Enforcement reported that companies are increasingly moving toward management agreements or franchising models 'in a strategy to reduce costs and increase flexibility in the business' (REV-19).

Such multi-tiered, fragmented business/ownership models have created different employment classes, with 'workers' having fewer rights and protections than 'employees'. Some of those workers classed as self-employed may have limited employment protections in the hospitality industry (REV-15). Interviewees indicated that some hotels, especially larger ones, tend to have a two-tier workforce; in-house staff working on specific terms and conditions and outsourced agency-staff on different, often worse, terms and conditions. Multi-tiered recruitment, i.e. subcontracting different roles like cleaning or catering, is arguably common, different organisations control agency-workers. Inv-23 discussed the issue of 'contracted labour who are working on hotel premises', saying that 'the industry does outsource a lot of its services, be it security, laundry, housekeeping and it varies from location to location … some of the locations are seasonal, so there's seasonal labour.' Inv-09 considered such employment models to be a 'system-wide' problem. Inv-18 discussed the layers of agencies involved:

> … one of the issues with recruitment in a lot of the hospitality jobs is that there are several layers to it, so it's not always somebody just going to an agency, signing up with an agency and getting a job. There are lots of subagents, and there's no regulation of that (Inv-18).

Similarly, Inv-23 highlighted:

> I think just to highlight it being quite a fragmented industry, it's quite a difficult one to pin down the human and labour rights thing … not separating human from labour rights because they inevitably overlap and [are] intrinsically connected … high demand at certain times of the year. So again the contracting part of it is quite substantial … and that comes into the supply chain … '

Precarious contracts use is also common, with about 25% of hospitality workers on zero-hour contracts (STA-16). Part-time and casual jobs provide flexible work. However, employers often dictate contract terms; arguably giving more flexibility to employers with the potential for workers to earn less and without access to rights like sick pay. Casual/agency-workers are entitled to Statutory Sick Pay (SSP), accessible only after three months continuous employment and the fourth day of illness (REV-13, p 24). Inv-01 stated:

> The sector has got itself into a very clever narrative which says that the sector can offer great flexibility, because look, a high proportion of the workforce are on flexible hours … dictated by the employer and not the individual, so it doesn't work. It's *not* flexible.

Such employment models are purposefully fragmented, casual and perceived to be cost-effective. Inv-17 said that some companies may seek to 'distance' themselves from their direct obligations to their workforces through such models (Inv-17). Fissured employment relationships are more 'susceptible to violations as they create legal ambiguities, preferred by lead firms', as to who is responsible for labour market violations (REV-19). It is important to note that hotels may have 'legitimate needs' for such staffing methods, as response to seasonal demand fluctuations. However, without sufficient oversight and regulation, such precarious employment models can potentially be used 'to cut costs while reducing lead companies' legal responsibility for the wages and workers' conditions in their supply-chains' (REV-13).

More importantly, such models have inherent weaknesses regarding workers' ability to demand their rights. Such employment contracts may have contributed to creating an employer-employee power imbalance in the employer's favour. Arguably, those working in uncertain, unreliable conditions are less likely to assert or even request rights they are entitled to:

> … the Gig Economy, the fluidity now that employers expect of many workers. And for many it offers a chance of flexibility, but for a lot more it means … difficulty in … having their rights upheld, and having the confidence to articulate their rights, and challenge those rights if they are not being upheld (Inv-21).

Research participants highlighted the challenges for temporary workers or those recruited through agencies in upholding their rights. For Inv-21, people are recruited through different agencies sometimes without knowing who their employers are, because companies often move fast, with contracts potentially changing. Inv-21 argued how many agency-workers desire to be employed directly, their 'ultimate dream' with more protection and job security.

4.2.2. Scarce opportunities to organise

Compliance approaches, developed to address labour exploitation, like social auditing and monitoring, are not specifically designed to empower workers nor address power imbalances between workers and employers. As Inv-02 and Inv-14 stated, approaches may be 'purely led by employer' and 'top-down', tending to encourage box-ticking exercises. Such approaches do not involve workers in grievance and remediation mechanisms, nor deal with a problem's root causes. For Inv-14, workers cannot effectively inform policies or say 'this is what is actually happening, and this is how it makes me feel, and this is what would be better.' For those interviewed, workers have not currently the chance to 'sit in the conversations' about making new policies, despite having to live with them.

Unionisation levels in the hotel industry remain low, partly because of workforce structure and operation, with 'strategic outsourcing of labour with vigour' and 'similar enthusiasm for zero-hour contracts' (Wood, 2020, p. 142). The percentage of employees who were trade union members in the UK hospitality industry fell by 5% over 1995–2018 (STA-16; Wood, 2020). Workers might not even 'recall any union presence' (REV-19). It is challenging for unions to organise when work is not regular, and workers not aware in advance which hotel they would be working within that day. Some employers have been hostile towards unions (Wood, 2020). For example, statements were included in some UK hotel-chain MS statements abut a trade union not being recognised (STM-38). Inv-18 stated that existing unions complain that hotels do not allow them to hold meetings with staff, although the hotel companies state their workers are free to join a union if they wish. They may even have 'posters up on staff noticeboards about unions'. Inv-18 stated that hotels appear less keen for unions to meet the staff, and don't want probably to open 'a can of worms', because unions have been 'quite pushy and vocal'. Nonetheless, there have been low levels of industrial conflict, consistent with the unionism absence in the industry (Wood, 2020).

For Inv-13, this reflects that the hotel industry is 'quite on purpose very fragmented', without a united workforce working for a single employer and belonging to a single union, but with different agencies supplying workers with different skills, stating:

> You have like security guards and reception that are employed through an agency, and then the housekeeping staff are employed by a different agency … different elements that report to different employers, and that makes it more difficult for people to organise … be in the same union, or they don't see themselves as a joint workforce.

Without union support and collective bargaining, it would arguably

be very challenging for individuals to uphold their rights on their own (REV-19). Trade unions can also raise awareness and negotiate better contracts for employees as, for example, Inv-17 said sometimes workers, not knowing the best forms of employment contracts for them, sign without full knowledge. Knowledge of employment rights tends to be 'individualised' (REV-19), and in the UK businesses can replace striking workers with agency-workers (GUID-22).

4.2.3. Reported sentiments of fear

There exists a world-wide context, and therefore a much broader relevance of the analysis, including interviewee accounts, that has implications far beyond the UK. Thus, interviewees referred to what they perceived as heading for almost a 'hard stop' on immigration, or 'net zero on immigration'. As Inv-12 explained, 'it will force modern slavery underground and the reporting will be pointless.' Or, as Inv-15 stated, a policy that only allows high-level immigrants to come in, or 'the best of the best', would mean it does not include cleaners, domestic workers, carers or hospitality employees. Inv-15 stated that 'It goes beyond modern slavery; it is about immigration policy'. Inv-05 also referred to so-called 'government language' which they thought might also encourage a certain general fear among migrants. Interviewees referred more specifically to what they saw as a UK immigration shift in approach, and an arguable lack of protection afforded to migrant workers, increasing workers' potential vulnerability. Interviewees argued that workers might be prone to accepting potentially exploitative practices due to a perceived fear of possible deportation. Outsourcing and unreliable contracts in the industry have arguably already increased the power imbalance between employer and employee. As elsewhere in the world, being a migrant worker may add another level of vulnerability, with fear among workers, who do not seek help, according to Inv-17, arguing 'workers won't kick up a fuss if they fear that they're going to get deported.'

A year after the MS Act was passed in the UK, the Immigration Act 2016 came into force, introducing the concept of the crime of 'illegal working'. By that law's definition, many people trafficked to the UK, for example, are illegally working, giving traffickers another means of coercion for 'if this person is standing out of line, getting out of line, you can denounce them to the authorities' (Inv-15). Being a migrant makes them more vulnerable, with Inv-08 considering international, but also domestic migration, including UK citizens who have moved from their home, as 'one of the main vulnerability factors' as:

> one of the key issues, people being taken away from where they have networks of support … being a migrant, there's a lack of ability to be able to do certain things. And the more that is illegal migration, the more vulnerable they become clearly as well.

It should be noted that vulnerability can be caused by many factors. However, improving the regulatory environment and enhancing the power balance between employer and employee are key. Yet, as discussed next, workers are primarily responsible for upholding their own rights, while the related enforcement bodies are arguably significantly underfunded.

4.3. Risks of possible enforcement gaps

4.3.1. Public and individual enforcement

An effective way to prevent exploitative practices is to ensure labour inspections are up-to-standard. Yet several interviewees felt that legislation is not adequately enforced. Inv-17 stated:

> Governments are always very keen to look at prosecutions … to talk about evil traffickers, and they like to talk about criminality. What governments don't like to talk about are labour rights and enforcement of existing laws. In Great Britain we have the *Gangmaster and Labourer Abuse Authority*. And their remit is to make sure that

workers aren't being exploited in various sectors across Great Britain, however they are seriously underfunded.

Inv-11 stated that legislation, no matter how well-designed, is nothing more than just 'good intention on a page' without adequate implementation and enforcement. Inv-14 also explained that: 'Legislation is only as good as its enforcement … Historically, it's been enforced by charities who are doing loads of research into terrible modern slavery statements'.

The UK government, for example, has embraced a two-tier mechanism for enforcing labour standards: Individual and public enforcement. The latter is limited by under-resourcing. To illustrate this, Inv-21 said: 'GLAA's capacity is not thin, it is very thin.' They have to be 'very shrewd and very tight' (Inv-21) about where and when to apply interventions and enforcement to get most use of their power and resources. Indeed, the GLAA with 119 employees across the UK (dealing with 30 million workers), have 76% operational (REV-16). As Anti-Slavery International reported (REV-17), the ILO's recommended target of one inspector per 10,000 workers is not matched by the current 0.4 inspectors per 10,000, which leaves the service seriously under-resourced,. GLAA only conducts 'intelligence-led' inspections and relies on workers reporting their exploitation (REV-17). The Immigration Act 2016 also extended the GLAA's remit and increased its power to tackle labour abuse throughout the UK labour market. Such a shift in the Immigration Act's context may, Inv-05 argued, give 'the game away', as GLAA found themselves responsible for the whole labour market, increasing workloads drastically. The GLAA's core-area, its success story, as Inv-09 said, is dealing with licensing labour providers in various industries within the fresh produce supply-chain. The scheme does not cover hotel-chains. Inv-15 argued that: 'All sorts of unsavoury characters with no checks and balances can be supplying staff to the hotel, charging what they like, and that's what leads to workers being exploited. The licensing still does not apply to the hotel-chains.'

Hotel companies can use fragmented, fluid employment models to lower costs, while the subcontracting agencies use strategies to increase their profitability. As Inv-21 said, companies go out to tender, looking to drive down costs, which can lead to the potential for an exploitative environment developing if not checked and challenged. Yet, as interviewees stated, GLAA's labour provider licensing does not cover the hotel industry. There is also a lack of transparency with how hotels manage contracts with labour providers. Thus, Inv-17 explained that hotels are 'very happy' to talk about something external to them, like 'traffickers using their lovely hotel for nefarious purposes'. But they are arguably less willing to disclose how they manage their operations through using agency-workers, and how their operational procedures might make workers more vulnerable to exploitation. In dynamics where labour enforcement bodies are arguably largely under-resourced, risks can be driven by precarious employment models and the expectation of worker abuses being reported individually.

Interviewees noted how the responsibility to uphold labour rights is often delegated to workers, who have to bring a claim to an employment tribunal. As Inv-17 stated: 'Workers don't have the knowledge, the time, the capacity, or the ability to … do that. Unless they are strongly supported by an NGO. Then it's very difficult for them to seek adequate redress'. Inv-13 stated that: 'Individualised way of enforcing rights makes it really difficult for people to access justice', and this should explain why abuses under the MS threshold are so widespread. There are various barriers seen as potentially preventing workers from accessing justice, like being unaware of their rights, how and where to get support, or having a language barrier (i.e. support might only be available in English). Inv-13 argued how some hotels display a 'sweeping under rug attitude', whereby workers could be discouraged from raising the issue to the authorities.

Where there are layers of agencies involved, the situation can appear very opaque. Inv-18 thought that, in those situations, companies might say that it is the agencies employing those workers who are exposing

them to any potential risks: 'Hotels sort of kicking the can down the road' (Inv-18). Nonetheless, even in cases when workers use tribunal systems, there is a long wait before the first hearing: the tribunal system has 'a 355 day wait before your first hearing' (Inv-07). Scholars like Balch (2015) have also argued that employment tribunals are notorious for being slow and unpredictable. The fees for lodging and pursuing claims can also make the route unattractive to some workers (Fudge, 2018). Inv-13 said that in a dynamic and sometimes highly transient industry like hospitality where jobs can frequently be casual, it makes sense to ask: 'Why should I bother? This is not the job I'm going to do for the next 20 years.' Delegating primary responsibility to enforce labour rights to workers further highlights a business-friendly approach. However, as Fudge (2018) posits, a field that is level for employers and businesses may still be very uneven for workers. As a result, we now discuss how the interviewees, and our other findings, all point to labour exploitation in the hotel industry being potentially becoming increasingly normalised and moralised.

4.4. Risk of normalisation and moralisation of possible exploitation

4.4.1. Risk of normalised exploitation

According to several interviewees, and as discussed in depth by Inv-15 and Inv-16, the problem is not solely a workplace issue. The problem, they argue, is structural. Our findings infer there is risk for the industry of some exploitative practices continuing and being tolerated by different stakeholders, including workers themselves, in light of the UK hotel industry's historical track record of labour force exploitation. Some interviewees said the industry may be relying on such practices to survive. Inv-18 said: 'it's just the norm. There's no will to change that practice on any side. There doesn't seem to be a business imperative, and that's what's frustrating'.

Inv-18 argued exploitative practices may have become normalised, making it 'incredibly difficult to crack'. Thus, Inv-18 said that they believed that it is an industry norm that housekeeping contracts are often based on number of rooms cleaned per day rather than hours worked. This targets-driven approach has the potential risk of leading to unpaid overtime. Inv-01 stated chefs often work 'chronic hours' without being compensated:

> And some research we did … showed they [chefs] were working some just chronic hours … way beyond their set standard hours they were being paid. But the company wasn't monitoring those necessarily.

Tis research found that this may be linked to employment tiers within the industry. Hotel-chains may employ workers directly or labour may be outsourced, when agencies conduct 'bidding wars' to provide services at the lowest cost possible. Although audits between lead firms and providers are legal, the 'everyday practices of providers' may create space for violation, e.g. using payment by room cleaned and not hours worked (REV-19); it is worth noting that piece-rate pay can also be deployed (REV-19). This has the potential to result in unrealistic contracts and downward pressure on workers. Regarding housekeeping contracts, Inv-18 highlighted that 'they [labour agencies] can only get down as far as minimum wage legally'. So, they legally pay housekeeping workers minimum wages. Yet, interviewees talked about workers, having to finish cleaning their room allocation for the day or risk losing their jobs, going 'over and above hours'. Despite this being a minimum wage infraction, workers may fear losing their jobs or having their hours reduced if they refuse to work overtime. The pressure of working so fast also risks potential accidental injuries, especially in kitchens.

Previous work from analysis of secondary documents revealed that systemic underpayment, poor access to social protections like breaks and holidays and sick pay, have arguably become more normalised (REV-13; REV-19). Thus, prior studies have argued that unpaid overtime and not respecting workers' breaks seem to be 'the norm' in the industry

that 'affects workers in all jobs and on all types of contracts', who may 'accept 'these situations as the 'norm' (REV-19). Our findings suggest there is a perception by some that this is how the hotel industry operates and the view that some actors may rely on such practices. Arguably, there may not be a strong business imperative to break this perceived norm. For Inv-18: 'That's what's been normalised'. Inv-01 argued: 'it's priced into working in the industry, which for some people is part and parcel of the experience, and for others, it's just too much.' Inv-01 stated:

> But I think it's less of an issue from a consumer or from a business because I think there's already this perception that the sector's not great to go and work in. It's hard work, you know, you're treated not brilliantly … it's already factored in many respects.

Further, Inv-13 reflected:

> If people are just entering the labour market, there are a lot of normalisations of abuses, because they do enter this sector where like abuse is already so normalised within the work, and also, they're quite new to the labour market. So, there's a lot of thinking that this is just the way things are.

Given the current challenges, including high turnover rate and staff shortages, working against this current norm was considered by several interviewees to be a sensible way forward rather than 'doing the same thing and knocking their head against the wall' (Inv-01).

4.4.2. Risk of moralising exploitation: apocryphal stories

Hotel workers, as the Trade Union Congress (TUC) reported, are often 'badly rewarded' for their efforts: Low pay and long hours are 'rife' in the industry. Likewise, the Director of Labour Market Enforcement reported that workers can sometimes be treated like 'machines' (REV-18). Yet, based on the findings, practices like low pay and long hours can be paradoxically depicted as a future investment. Inv-01 stated the industry's narrative is often that 'back in my days chefs were working loads of hours, they were happy to do that because they knew that was important to get to where they are now'. Inv-01 described what they saw as reluctance by some within the industry to rethink practices:

> It was probably quite soul-destroying to realise you probably have no impact on any thinking about labour within the hospitality sector, because you could not compete with this story about somebody who came in the sector, didn't really want to work, but then became a chief executive earning millions.

Likewise, Inv-10 talked about hearing often: 'so started as a kitchen porter and twenty years later he's the general manager of a hotel'. She also mentioned that even when such claims have an element of truth, the millennials in the current job market would not be willing to spend twenty years going from kitchen porter to general manager; the high staff turnover makes it clear workers are not prepared to take such long-term routes. Also, the TUC reported that in terms of pay, the hotel and hospitality industry does not offer employees much scope for pay progression. A typical hotel employee 'barely earns more in their thirties and forties than they do in their twenties', going against trends in the wider economy (REV-18). Inv-18 intimated, if one is an agency-staff member, opportunities for progress would be even more limited.

Inv-01 further explained the challenge is to convince the industry 'to think differently about how it retains, supports and doesn't exploit its workforce, partly because 'it would deny it [is] exploiting them, and legally it isn't, but morally I think it is in some cases.' Inv-01 argued that the legislation is robust enough to clarify what the industry should be doing, and that most businesses follow the legislation, the issue being related to 'moral exploitation', with successive de-skilling of particular roles and a lack of investment in staff.

4.5. Macro-level historical developments and the UK macro-policy framework: opportunity or setbacks?

In response to arguments about risks that exploitation could become normalised in hotel-chains, Inv-01 explained that there had been a 'historical realisation' about labour supply availability in the industry. Migrants from Europe previously comprised a large percentage of the once readily available UK hospitality workforce (REV-13). Around a quarter of UK hotel industry employees were from the EU in 2018, with 42% being migrant compared to 13% across all employees (REV-18). Immigration macro-level policy and system changes have caused a 'big changing picture' according to Inv-10, who explained that EEA nationals now have to apply for permits to remain under the EU Settlement Scheme.

Moreover, businesses laid off employees or put them on furlough during the Covid pandemic years due to government lockdown policies, and the labour market shrunk considerably post-pandemic. Indeed, the subsequent global 'great resignation' has seen people exit the labour market post-Covid. Thus, two years after the pandemic started, and despite unemployment falling below pre-pandemic levels, employment levels were still around 350,000 lower than before it began (STA-17). Based on the UK Labour Market Statistics (published Jan 2023), low employment rates and high vacancy levels mean the labour market is currently 'tight'; most of those who want to work are in work, meaning that recruitment is more difficult than usual, partly driven by lower net migration from the EU (STA-17). There is arguably 'a perfect storm' facing the industry, as Inv-08 suggested, with supply reduced and demand staying the same. This means pressure to attract more people to fill job vacancies, although businesses may be reluctant to raise wages, due also to macro-level government policy to constrain inflationary pressures. The hospitality industry now has to re-align, re-establish and reclaim the market in a different and more challenging economic time, despite organisations having fewer resources to devote to promote desirable working conditions.

The significant staff shortage for low-wage jobs has shown how the economy still needs 'low-paid migrant workers.' Inv-09, and other interviewees, argued that it is more challenging for businesses to hire 'those people that want to do those jobs, and can do those jobs, and are prepared to do at those pay points.' It is worth noting that there is a lack of evidence to support the argument that migrants have driven down the wages in the UK, as Inv-01 stated that 'clearly there's been a lot of research that shows actually migrant workers have not undercut wages'.

Except for a few schemes in industries other than hospitality, there is currently no general low-skilled (or low-wage) legal migrant route into the UK. Yet, the demand for such workers is still there, with staff shortages across several industries, including care, construction and hospitality becoming apparent. Inv-17 argued that 'there will be an increase in companies employing workers illegally from the … shadow economy'. For Inv-23, the risks of MS and exploitation are that ' … for the UK, the migrant workers [are] coming through the labour contractors, so it's outsourced work and that's where the weakness is … ' In the UK context Inv-23 felt that for 'those who are directly employed by hotels, that's not a problem,' although conceded that in their experience the latter could be problematic in other contexs internationally.

Inv-10 also suggested that small enterprises particular are struggling to compete against bigger organisations that can afford to put in place benefits and attractive incentives. It was argued by a number of interviewees that smaller companies, in order to have the labour they need to keep their business running, may potentially resort to undesirable labour practices. Likewise, Inv-07 suggested some businesses may take the risks of using 'less reputable channels' to recruit workers. Inv-09 also argued that this situation would:

> … increase that [risk of labour exploitation], and the National and Borders Bill will ramp that up even further … making it difficult for businesses to employ people from around the world.

Inv-08 explained that the groups who have travelled to the UK but are not allowed to work have the highest risk of getting into highly exploited situations. For Inv-19:

> When they're not legal to work, it's not going to stop people migrating. It's not going to stop it. People want a better life for themselves and if there are legal ways … jobs will be filled, and it will be legal. Now people are going to be the illegal, then everyone takes advantage of them. It just leaves people open for being taken advantage of and the horrors of exploitation.

The hotel industry may advocate to be made a special case so that they can recruit from abroad. Yet, such schemes, if not designed effectively, may potentially increase the risk of worker vulnerability. As Inv-13 stated, there is likely a higher risk of labour exploitation from a top-down perspective as the bottom-up perspective might be slightly better because there may be opportunities to organise. Staff shortages could allow workers to come together and bargain for better working conditions. Yet, interviewees were strongly of the view that workers' ability to organise has potentially been undermined by the current system.

It is worth noting an important point that, although intervieees tended to focus on the exploitation of migrant workers, labour exploitation should not be deemed solely an 'immigration issue'. Based on NRM and Duty to Notify (DtN) statistics, potential victims from the UK, Albania and Vietnam were the three most common nationalities to be referred to the National Referral Mechanism (NRM) in 2019 and 2020 (Home Office, 2020; Scott et al., 2012). UK citizens are also at risk of exploitation. Inv-19 argued:

> I think that's UK citizens as well who've got the right to be here, live here, work here. They're exploited by lots of the contracts as well …. No sick pay, no anything, and they can give you however many hours they do and don't want.

Despite the UK government recognising the significant scale of exploitation (HM Government, 2014); gaps in governance remain for MS (Hampton, 2019) with a lack of policy development focusing on domestic supply-chains (Crane et al., 2019; Lewis et al., 2015), and clear macro-level government oversight that is required to enforce compliance from the top down, rather than individual organisations alone having to be more mindful of other organisations in their supply chains that may (not) be implicated in MS and labour exploitation.

5. Discussion

Our research findings reveal how labour exploitation is seen by hotel industry experts and stakeholders as tending to be normalised and moralised, with workers' power successively minimised, along with their ability to organise and uphold their rights. Those we interviewed argued that the UK, as elsewhere in other countries, especially in the Global North, has witnessed shifts in some labour practices over the last four decades. The rise in the gig economy, flexible employment forms like zero-hour contracts, self-employment, and platform work (French, 2018; Hodkinson et al., 2021), all illustrate these changes. Our findings show stakeholders' views about some hotel-chains increasingly distancing themselves from their workers by using subcontracting and casual employment forms that arguably often do not provide workers with the same protection level as would more full-time, permanent contracts (REV-13); a key risk being the potential for labour exploitation and worker vulnerability becoming normalised and moralised.

Further, it was found how employment models can create ambiguity in the employer-employee relationship and blur knowledge and understanding of how exploitation occurs. Relevant enforcement bodies have remained under-resourced, facing challenges with enforcing existing labour laws (French, 2018). Ironically, while their role has been minimalised, workers are primarily legally responsible for upholding their own rights, a situation that applies internationally and in most other countries.

The findings of this research highlight that it is important that existing macro-level policies are reviewed both at the national and international levels, and that labour laws are properly implemented, with the system also benefitting from structural improvements, especially in terms of facilitating oversight of the relationship between hotel companies and agencies supplying low-skilled workers. Arguably, potential exploitation risks may not be completely eliminated, though prevention and improved awareness through policy development and structural design present opportunities for both the government and the hotel industry itself to embrace.

MS is not a 'bilateral affair between individual perpetrator and their victims' (Hodkinson et al., 2021, p. 83). Wider political and economic systems can be responsible for pushing workers into precarious employment relations, and need to be rethought. The regulatory framework's structural elements can potentially put people at risk. Organisations like the ILO, Council of Europe, and US Department of Labor, agree how crucial a firewall is between labour standards' enforcement and immigration controls, ensuring irregular migration status does not undermine entitlements or labour rights enforcement. However, immigration and employment enforcement are often currently intertwined, as seen in the UK context. This arguably contrasts with countries like the Netherlands and Belgium, which guarantee all workers employment rights, regardless of immigration status (REV-13; Kenway, 2021).

In the UK, shifting labour market approaches and immigration policies have lessened hotel workers' input, with labour exploitation risking being normalised and moralised. Employment models need changing to empower workers in long-term economic transformation processes. Yet, staff shortage may further encourage hotel industry actors to use casualisation strategies in recruiting workers from the shadow economy, with few legal routes for low-skilled, migrant workers, thereby increasing worker vulnerability to exploitation risks.

Our inductive analysis has led us to theorise that certain mainstream employment models may minimise workers' power to organise and uphold their rights, while shifts in power dynamics have led to increasing worker vulnerability to potential labour exploitation which could become further normalised and moralised. We propose a new concept that we label the '(in)conspicuous exploitariat' (see Fig. 1) to encapsulate the potential effects upon workers and the risks' worst-case scenario consequences critiqued earlier. These workers, as the '(in) conspicuous exploitariat' are distinct from and arguably potentially more open to exploitation than the worker precariat. They may exist in various sectors due to pervading macro-economic and political forces affecting labour demand, supply, power structures, and business models. They may be described as workers who are discreetly present, who may be seen by others in their work roles, but paradoxically also remain unseen, and thus 'under the radar', and who may be then unrecognised as experiencing conditions of exploitation, forced labour or even MS.

6. Conclusion

The UK accommodation and food sector employs over two million people, in the UK (Anti-Slavery International, 2022; REV-19). This research centres on the UK, but has important international relevance for tourism and hospitality. Hence, the sector's experiences can inform policy and practice in addressing MS and labour exploitation across the UK, as the country of focus, but also in other countries and interationally. Nevertheless, labour exploitation, MS and forced labour are significantly neglected in academic research. Adopting a multidisciplinary and qualitative approach to exploring the potential risks for UK hotel-chains of labour exploitation, those we interviewed argue that the potential normalisation and moralisation of labour exploitation is an arguably critical issue that the industry can avoid.

Stakeholders and experts argue that without shifts in regulatory frameworks, change in existing employment models appears unlikely. Further, workers themselves should be positioned as equal agents in the
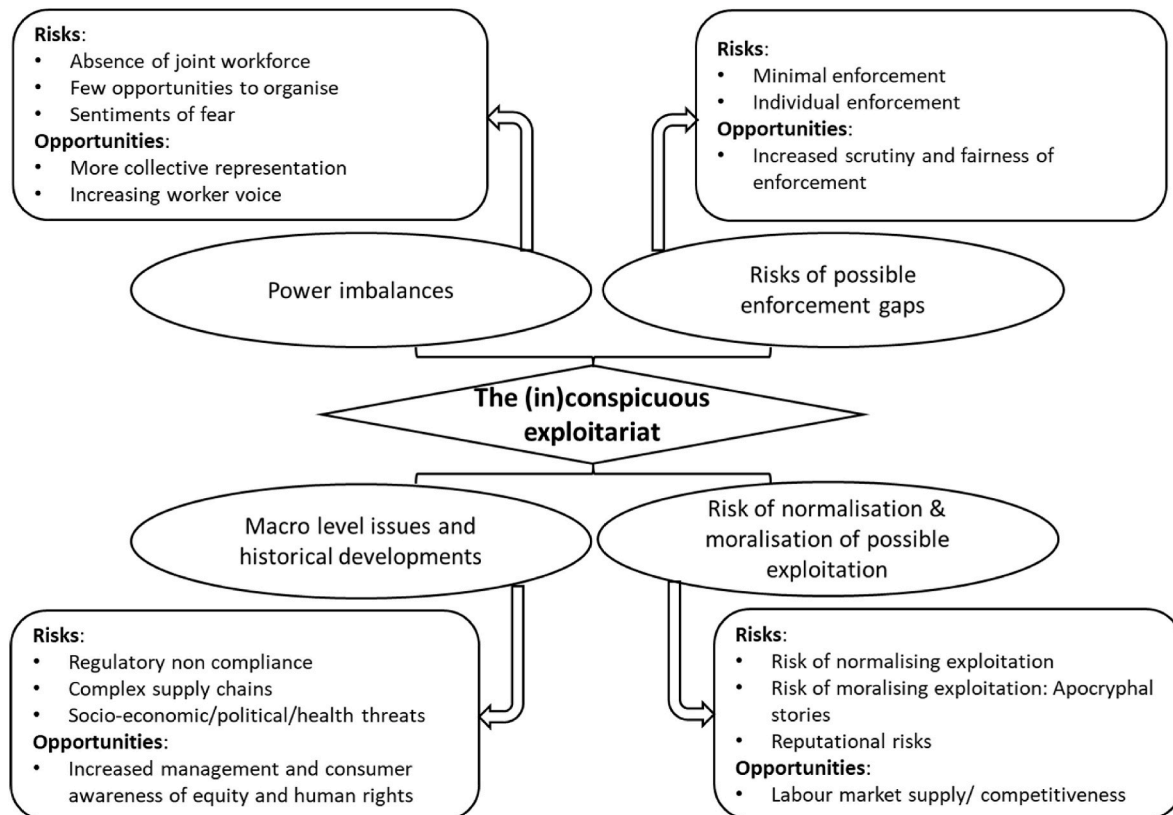

Fig. 1. Conceptual model - The '(in)conspicuous exploitariat'.

longer-term economic transformation process, despite new forms of employment models arguably minimising workers' power to organise and demand their rights. Without modifications to industry employment relations' power dynamics, workers' vulnerability and exploitation risks may take place and persist.

There remain important directions for future tourism and hospitality research. Little is known about the extent to which exploitative labour is associated with migrant and non-migrant workers; what conditions make non-migrant workers vulnerable to exploitative practices; and appropriate remediation practices and interventions in relation to migrant workers' rights to work (especially in low-skilled vs high-skilled jobs). Research on these workers could be particularly insightful, providing evidence on how migrants drive labour costs down, but rather explore successive 'flexibilisation' strategies. Second, the research community, policymakers and legislators, should consider MS from victims' perspectives (Doyle et al., 2019); as a policy approach that is not holistic would arguably push the issue further underground.

However, employment and business models vary and some hotels and hospitality organisations should be commended, and encouraged further, for using employment practices that can act as models for others in the industry, focusing on reducing potential risks. These should be explored further, not only by tourism and hospitality researchers, but also by management who should be alert to the risks highlighted here, like considering the impacts of MS on reputational risk with increasingly informed and concerned consumers. Managers should therefore exchange information with others on best practice, and take steps to minimise potential risks.

Author credit statement

Professor Bullock and Professor Di Domenico provided overall leadership for the project from its inception; they initiated the research and its development and design, oversaw the field work and analysis, and took the lead on its theoretical development and the write up of the paper. Professor Miller contributed to shaping the theoretical framework for the paper and expertise in the hotels and tourism industry and the write up of the paper. Dr Shirgholami carried out data collection and also made significant contributions to both the analysis and the write up of the paper. Dr Wong carried out data collection.

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Impact statement

This article examines the complex challenges of the risks of possible labour exploitation and modern slavery (MS) for the hotel industry. Based on analyses of primary and secondary sources focusing primarily on the UK context, it finds risks and potential drivers, namely: power imbalances; risks of possible enforcement gaps; risks of normalisation and moralisation of possible exploitation; and potential threats posed by macro-level political and socio-economic issues. These, including more competitive labour markets, also present opportunities. There are actionable implications for policy makers and managers, both in the UK and internationally. Arguably, modifications to employment relations' power dynamics could reduce risks of possible worker vulnerability. Moreover, consumers are becoming increasingly informed and concerned about such issues. As employment and business models vary, those using effective employment practices can act as models for others in the industry, enabling managers to exchange best practice with others, thereby potentially minimising risks.

Declaration of competing interest

None.

References

Allain, J., Crane, A., LeBaron, G., & Behbahani, L. (2013). *Forced labour's business models and supply chains*. York: Joseph Rowntree Foundation.

Anderson, B. (2010). Migration, immigration controls and the fashioning of precarious workers. *Work, Employment & Society, 24*(2), 300–317.

Anti-Slavery International. (2022). Exploitation in the UK hotels. https://www.antislavery.org/what-we-do/past-projects/staff-wanted-initiative/. (Accessed 2 February 2022).

Armstrong, R., & Matters, R. T. (2016). Modern slavery: Risks for the UK hospitality industry. *Progress in Responsible Tourism, 5*(1), 67–78.

Balch, A. (2015). Understanding and evaluating UK efforts to tackle forced labour. In L. Waite, G. Craig, H. Lewis, & K. Skrivankova (Eds.), *Vulnerability, exploitation and migrants. Migration, diasporas and citizenship*. London: Palgrave Macmillan.

Baum, T. (2006). *Human resource management for tourism, hospitality and leisure: An international perspective*. London: Thomson Learning.

Baum, T. (2007). Human resources in tourism: Still waiting for change. *Tourism Management, 28*(6), 1383–1399.

Baum, T. (2015). Human resources in tourism: Still waiting for change?–A 2015 reprise. *Tourism Management, 50*, 204–212.

Baum, T. (2018). Sustainable human resource management as a driver in tourism policy and planning: A serious sin of omission? *Journal of Sustainable Tourism, 26*(6), 873–889.

Baum, T., Cheung, C., Kong, H., Kralj, A., Mooney, S., Nguyễn Thị Thanh, H., Ramachandran, S., Dropulić Ružić, M., & Siow, M. L. (2016). Sustainability and the tourism and hospitality workforce: A thematic analysis. *Sustainability, 8*(8), 809.

Baum, T., Solnet, D., Robinson, R., & Mooney, S. K. (2020). Tourism employment paradoxes, 1946-2095: A perspective article. *Tourism Review, 75*(1), 252–255.

BHRRC. (2019). *Beyond compliance in the hotel sector: A review of UK modern slavery act statements*. London: Business and Human Rights Resource Centre.

Braun, V., & Clarke, V. (2022). *Thematic analysis: A practical guide*. London: Sage.

Broad, R., & Turnbull, N. (2019). From human trafficking to modern slavery: The development of anti-trafficking policy in the UK. *European Journal on Criminal Policy and Research, 25*(2), 119–133.

Carrington, M., Chatzidakis, A., & Shaw, D. (2021). Consuming worker exploitation? Accounts and justifications for consumer (in)action to modern slavery. *Work, Employment & Society, 35*(3), 432–450.

Cooper, C., Hesketh, O., Ellis, N., & Fair, A. (2017). *A typology of modern slavery offences in the UK*. London: Home Office.

Crane, A., LeBaron, G., Allain, J., & Behbahani, L. (2019). Governance gaps in eradicating forced labor: From global to domestic supply chains. *Regulation & Governance, 13*(1), 86–106.

Doyle, D. M., Murphy, C., Murphy, M., Coppari, P. R., & Wechsler, R. J. (2019). I felt like she owns me': Exploitation and uncertainty in the lives of labour trafficking victims in Ireland. *The British Journal of Criminology, 59*(1), 231–251.

Field, F., Miller, M., & Butler-Sloss, B. (2019). *Independent review of the modern slavery act 2015. Secretary of State for the Home Department*. Available at: https://www.gov.uk/government/publications/independent-review-of-the-modern-slavery-act-final-report. (Accessed 2 February 2022).

French, S. (2018). Between globalisation and Brexit: Migration, pay and the road to modern slavery in the UK hospitality industry. *Research in Hospitality Management, 8*(1), 23–31.

Fudge, J. (2018). Illegal working, migrants and labour exploitation in the UK. *Oxford Journal of Legal Studies, 38*(3), 557–584.

Geddes, A., Craig, G., Scott, S., Ackers, L., Robinson, O., & Scullion, D. (2013). *Forced labour in the UK*. York: Joseph Rowntree Foundation.

Hack-Polay, D., Dal Mas, F., Mahmoud, A. B., & Rahman, M. (2022). Barriers to the effective exploitation of migrants' social and cultural capital in hospitality and tourism: A dual labour market perspective. *Journal of Hospitality and Tourism Management, 50*, 168–177.

Hall, C. M., & Page, S. J. (2009). Progress in tourism management: From the geography of tourism to geographies of tourism–A review. *Tourism Management, 30*(1), 3–16.

Hampton, D. B. (2019). Modern slavery in global supply chains: Can national action plans on business and human rights close the governance gap? *Business and Human Rights Journal, 4*(2), 239–263.

Harrison, H., Birks, M., Franklin, R., & Mills, J. (2017). Case study research : Foundations and methodological orientations, forum qualitative sozialforschung/forum. *Qualitative Social Research, 18*(1), 1–12.

Harvey, G., Rhodes, C., Vachhani, S. J., & Williams, K. (2017). Neo-villeiny and the service sector: The case of hyper flexible and precarious work in fitness centres. *Work, Employment & Society, 31*(1), 19–35.

Hodkinson, S. N., Lewis, H., Waite, L., & Dwyer, P. (2021). Fighting or fuelling forced labour? The modern slavery act 2015, irregular migrants and the vulnerabilising role of the UK's hostile environment. *Critical Social Policy, 41*(1), 68–90.

HM Government. (2014). *Modern Slavery Strategy*. https://assets.publishing.service.gov.uk/media/5a7e460340f0b6230268a4b1/Modern_Slavery_Strategy_FINAL_DEC2015.pdf. (Accessed 2 February 2022).

Home Office. (2020). *Modern slavery: National referral mechanism and duty to notify statistics UK*. End of Year Summary, 2020.

Human Trafficking Foundation. (2018). Tackling modern slavery in the hotel sector. https://www.humantraffickingfoundation.org/news/2018/10/1/tackling-modern-slavery-in-the-hotel-sector. (Accessed 2 February 2022).

ILO. (2017). *ILO guidelines on decent work and socially responsible tourism*. Geneva: International Labour Organization.

ILO. (2022). *Global estimates of modern slavery: Forced labour and forced marriage*. Geneva: International Labour Organisation (ILO), Walk Free, and International Organization for Migration (IOM).

Janta, H., Ladkin, A., Brown, L., & Lugosi, P. (2011). Employment experiences of Polish migrant workers in the UK hospitality sector. *Tourism Management, 32*(5), 1006–1019.

Jones, P., & Comfort, D. (2021). Modern slavery statements and leading UK hotel companies. *Athens Journal of Tourism, 8*(3), 147–162.

Joppe, M. (2012). Migrant workers: Challenges and opportunities in addressing tourism labour shortages. *Tourism Management, 33*(3), 662–671.

Kenway, E. (2021). *The truth about modern slavery*. London: Pluto Press.

Ladkin, A. (2011). Exploring tourism labor. *Annals of Tourism Research, 38*(3), 1135–1155.

LeBaron, G., & Rühmkorf, A. (2019). The domestic politics of corporate accountability legislation: Struggles over the 2015 UK Modern Slavery Act. *Socio-Economic Review, 17*(3), 709–743.

Lewis, H., Dwyer, P., Hodkinson, S., & Waite, L. (2015). Hyper-precarious lives: Migrants, work and forced labour in the Global North. *Progress in Human Geography, 39*(5), 580–600.

Lucas, R. E. (1995). Managing employee relations in the hotel and catering industry. In *Londom: Cassell plc*.

Lucas, R. (1996). Industrial relations in hotels and catering: Neglect and paradox? *British Journal of Industrial Relations, 34*(2), 267–286.

Lugosi, P. (2019). Deviance, deviant behaviour and hospitality management: Sources, forms and drivers. *Tourism Management, 74*, 81–98.

Lugosi, P., & Ndiuini, A. (2022). Migrant mobility and value creation in hospitality labour. *Annals of Tourism Research, 95*, Article 103429.

Ndiuini, A., & Baum, T. (2021). Underemployment and lived experiences of migrant workers in the hotel industry: Policy and industry implications. *Journal of Policy Research in Tourism, Leisure and Events, 13*(1), 36–58.

Nowell, L. S., Norris, J. M., White, D. E., & Moules, N. J. (2017). Thematic analysis: Striving to meet the trustworthiness criteria. *International Journal of Qualitative Methods, 16*(1). https://doi.org/10.1177/1609406917733847

Paraskevas, A., & Brookes, M. (2018). Nodes, guardians and signs: Raising barriers to human trafficking in the tourism industry. *Tourism Management, 67*, 147–156.

Potter, M., & Hamilton, J. (2014). Picking on vulnerable migrants: Precarity and the mushroom industry in northern Ireland. *Work, Employment & Society, 28*(3), 390–406.

Robinson, R. N. (2013). Darker still: Present-day slavery in hospitality and tourism services. *Hospitality & Society, 3*(2), 93–110.

Robinson, R. N., Martins, A., Solnet, D., & Baum, T. (2019). Sustaining precarity: Critically examining tourism and employment. *Journal of Sustainable Tourism, 27*(7), 1008–1025.

Scott, S., Craig, G., & Geddes, A. (2012). *Experiences of forced labour in the UK food industry*. York: Joseph Rowntree Foundation.

Skrivankova, K. (2010). *Between decent work and forced labour: Examining the continuum of exploitation*. York: Joseph Rowntree Foundation.

Winchenbach, A., Hanna, P., & Miller, G. (2019). Rethinking decent work: The value of dignity in tourism employment. *Journal of Sustainable Tourism, 27*(7), 1026–1043.

Wood, R. C. (1997). *Working in hotels and catering* (2nd ed.). London: International Thomson Business Press.

Wood, R. C. (2020). Perspectives on hospitality industry trade unionism in the UK and beyond. *Research in Hospitality Management, 10*(2), 137–147.

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