



University of
Nottingham
Rights Lab

Safe Car Wash App Report

Rights Lab
University of Nottingham





Foreword

Long before The Clewer Initiative and the Santa Marta Group joined together to launch the Safe Car Wash app, hand car washes had been named as a key battleground in the fight against modern slavery in the UK. However, data was patchy. Law enforcement did not have the resources to count each hand car wash, let alone investigate them all. We designed the Safe Car Wash app as a way to bring the issue into the mainstream, in the hope that the general public would see a role for themselves in mapping and reporting modern slavery in hand car washes.

We were seeking to combat a phenomenon that Pope Francis calls the globalisation of indifference, where the laudable value of tolerance is twisted. Instead of looking out for our neighbour, finding common ground, and exploring our differences, we ignore them. This indifference fuels modern slavery, because as a society we have chosen to ignore the most vulnerable.

In that light we were encouraged to see how many people did download and use the Safe Car Wash app but until now we have only been able to look at the headline figures. This report is the first time we have been able to dig into the data. The value of robust research and evaluation cannot be overestimated. With such a hidden crime, more and better information is needed across the board.

Broadly, this report confirms what we had already surmised. Many hand car washes are suspect and do not protect their workers. A lack of protective equipment and fearful and withdrawn body language are far more common than one would hope.

We were disappointed to learn that only 18% of those who were prompted to call the Modern Slavery Helpline did so, whilst acknowledging that they may have called at another time, or reported in a different way.

That so many people downloaded and used the Safe Car Wash app is indeed an encouraging sign, but we obviously have more work to do in understanding why some people may be reluctant to report what they have seen.

As well as noting the limits of our advocacy, the report is also limited by the data available to the researchers. To encourage more people to use the Safe Car Wash app, we worked with our developers to make it as simple as possible. That meant no complicated questions, and very little room for nuance. As a result we don't know why one person called the helpline, when another, who may have seen almost exactly the same concerning signs, chose not to.

Alongside this report into the data generated by the app, we have been pleased by the anecdotal feedback that we have received from law enforcement, that the app's data has been exactly what we envisaged it to be: a piece of the puzzle, which they can put together with their own intelligence and experience. As a result of their feedback and this report we have made a few updates to the Safe Car Wash app which will make it simpler and more effective for both users of the app and users of the data.

Modern slavery can only be ended through partnership. We hope the Safe Car Wash app, and this report, will inform policy makers and those on the front line as they engage with the problem of exploitation in hand car washes. We hope too that this report provides a useful example of what can be achieved by bringing together technology, insight, and people of goodwill, while highlighting the gaps that are still to be filled.

The Rt Revd Dr Alastair Redfern,
The Clewer Initiative
The Rt Revd Patrick Lynch,
Santa Marta Group

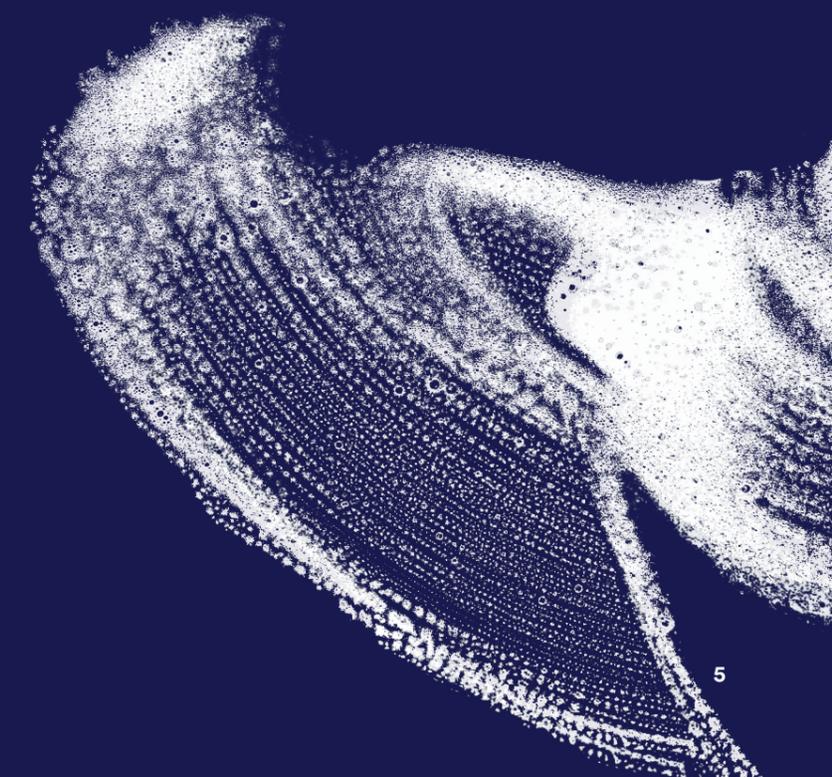


Introduction

The Home Office estimates that there are 10,000 – 13,000 victims of modern slavery in the United Kingdom (UK)ⁱ, many of whom are forced or coerced into performing work for little or no pay and exploited in a variety of industries. One area where exploitation is said to be prevalent is the hand car wash (HCW) sector, a popular form of car wash service, which is performed manually. Prior to 2004 the presence of HCWs as a business activity was virtually non-existent, but research suggests that they now dominate the car wash market.

Although HCW operations have grown at an exponential rate, their activities, business models and workforce are only just beginning to gain attention. Recent scrutiny of HCW

activities has unearthed exploitative labour and employment practices. Reports, press coverage, and investigations describe excessive working hours, withholding of wages or below national minimum wage (NMW) payments and working without adequate protective safety gear and equipmentⁱⁱ. Reportedly, there exists a spectrum of abuse in HCWs. While some workers are subject to some form of labour and employment violation, others are forced into modern slavery, compelled to work gruelling hours under the threat of violenceⁱⁱⁱ. The lack of data makes it difficult to estimate the prevalence of labour exploitation and modern slavery, which is critical to address abuses in this high-risk trade.



The Safe Car Wash app

In June 2018, The Clewer Initiative and the Santa Marta Group, in partnership with a number of stakeholders, launched the Safe Car Wash app, which seeks to provide a community intelligence-led approach to mapping car washes across the UK and gathering data in relation to modern slavery^{iv}. Since then it has been downloaded 8225 times^v. The app enables users to anonymously provide information on the location and setting of the car wash, workers' access to suitable clothing, living arrangements, the presence of minors working on site, and the cost and method of payment. Users are prompted to call the Modern Slavery Helpline if their answers indicate that there is a likelihood of modern slavery or exploitation at the car wash. Anonymous data collected from the app is shared with the National Crime Agency, the Gangmasters and Labour Abuse Authority,

and the National Police Chiefs' Council. These agencies are given real-time access to the data to help develop the intelligence required to lead effective investigations.

In order to further understand the data collected, The Clewer Initiative and Santa Marta Group generated a dataset including app users' responses from June 26th to December 3rd 2018, and shared it with the Rights Lab at the University of Nottingham for analysis. Entries that have been partially completed by the users are excluded from this dataset, which comprises 2271 entries. This report outlines the findings from the data, and reflects on how the app might promote a better understanding of the industry and promoting higher standards in the future.

“

Thank you for providing us access to this tool against modern slavery and human trafficking (MSHT). From the data we reviewed we did find three identifiable car wash locations which showed potential signs of MSHT that had not been brought to our attention previously.”

**Kent and East Sussex
Serious Crime Directorate**

“

The Gangmasters and Labour Abuse Authority (GLAA) have worked closely with The Clewer Initiative (TCI) on the development of the 'Car Wash App', and we are one of the organisations 'badged' within it. We are the link between the TCI [The Clewer Initiative] and UK law enforcement and we have ensured that every police force has a 'log on' to the database and particularly the map of car washes that the app creates. We see great value in the use of technology in the fight against Modern Day Slavery and Labour Exploitation and commend TCI for the leading role they have taken in this area and the lead they have given to willing partners – ourselves included.”

**Gangmasters and Labour
Abuse Authority**

“

Modern day slavery is a rising threat to our communities, and because of its hidden nature, is a major concern - we all need to be alert to it, wherever we live. Councils are committed to protecting the most vulnerable in society, but everybody has a role to play in tackling this terrible crime. This is why the LGA has been pleased to be involved in the development of the Safe Car Wash app, and encourages people to use it to help identify these ruthless profiteers and rescue their victims from lives of servitude. Reporting any concerns through this app could make a world of difference to people being exploited at the hands of heartless gangmasters.”

Councillor Simon Blackburn
Chair of the Local Government
Association's (LGA) Safer and
Stronger Communities Board



Acknowledgements

We would like to thank the Clewer Sisters and Trustees, as well as the CCLA for making the Safe Car Wash app possible. Thank you also to the Gangmasters and Labour Abuse (GLAA), the National Crime Agency (NCA), the Local Government Association (LGA) and the National Police Chiefs' Council (NPCC) for your support of the Safe Car Wash app. We owe a debt of gratitude to all those who advised us on what the app should look like and the key indicators we needed to include, thank you for giving us your time and expertise. Thank you to the Modern Slavery Helpline for providing insight into the reporting of

modern slavery in hand car washes and for the work you do to help end modern slavery. Finally to all those who have used, and continue to use, the Safe Car Wash app - in the complex landscape of modern slavery you are bringing clarity and insight, thank you.

This report was produced and funded by the Rights Lab at the University of Nottingham. It was authored by Dr Akilah Jardine and Dr Alison Gardner (Rights Lab Governance Programme), with assistance from Dr Selim Cakir (Rights Lab Business Programme), and Dr Mike Gardner.

Application usage

When the app was launched in June 2018, there was a high-level of application usage. Modifications were subsequently made to the app in July 2018 that sought to respond to early user feedback. The app was promoted through the grass roots networks of The Clewer Initiative and the Santa Marta Group and through the Gangmasters and Labour Abuse Authority (GLAA), the National Police Chiefs' Council (NPCC), National Crime Agency (NCA), and the Local Government Association (LGA). Trade bodies such as the London

Taxi Drivers Association and the Car Wash Advisory Service also publicised the app to their members. Heightened public and media attention to abuses occurring in this sector also contributed to the promotion of the app, in particular, media coverage of the Environmental Audit Committee's inquiry into the social and environmental impact of hand car washes (HCWs).

Although usage dropped after the initial marketing push in June 2018, there was evidence of stabilisation and a steady rate of reporting from September 2018 onwards.

See Figure 1 (right)

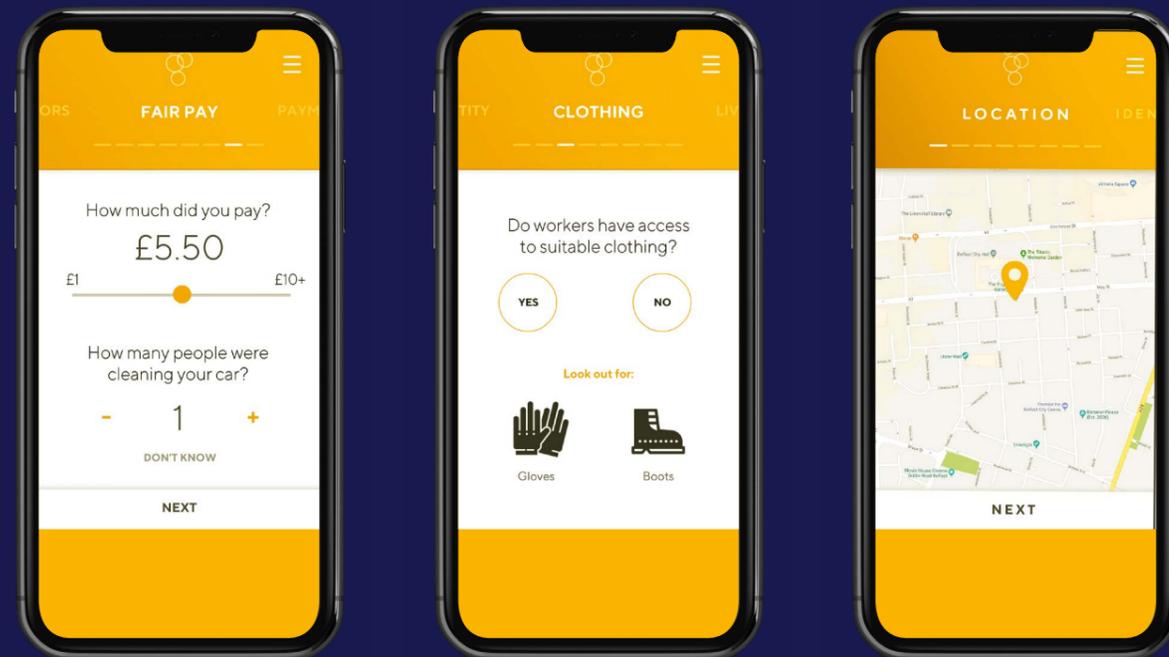
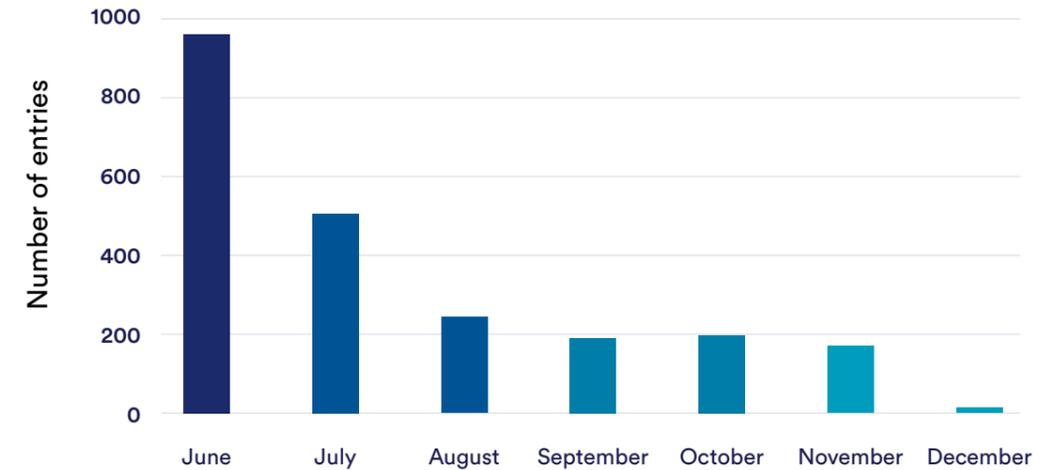


Figure 1
Safe Car Wash app monthly usage



(Source: Safe Car Wash app online car wash report, 2018)

The app has been welcomed by many national and local anti-slavery activists. Regular users of the app commented:

“The Safe Car Wash app is something I have started using since becoming aware of modern slavery within the car washing business. It's really easy to use and being available on your phone, it doesn't cause suspicion while you're having your car washed. It has helped me to really take notice of the subtle differences between how different car washes are run. It helps in many ways from spotting the signs when something's not right, to giving the confidence to report it.”

Helen, Lichfield
Safe Car Wash app user

“The safe carwash app is extremely quick and easy to use, with straightforward questions. I found it satisfying to know that following it through with a conversation to the Modern Slavery Helpline has contributed to providing local information that may enable further investigation by the Police.”

Elizabeth, Portsmouth
Safe Car Wash app user

“I found the app very easy to use and I got through to someone at the Modern Slavery Helpline very quickly. From the conversation

I had with the helpline it looked as if this was a case of labour exploitation but not slavery. I was assured the information I'd given would be passed on to GLAA.”

Judith, Sheffield
Safe Car Wash app user

“I found the Safe Car Wash app very clear and easy to use, and it was great that it was able to prompt me to ring the Modern Slavery Helpline as a result of my answers. When I spoke to them, I was able to answer most of their questions easily because the app had already prompted me to consider the questions they asked me. Using the app has also helped me to be more aware of the signs to look out for not only at carwashes, but in other industries too...”

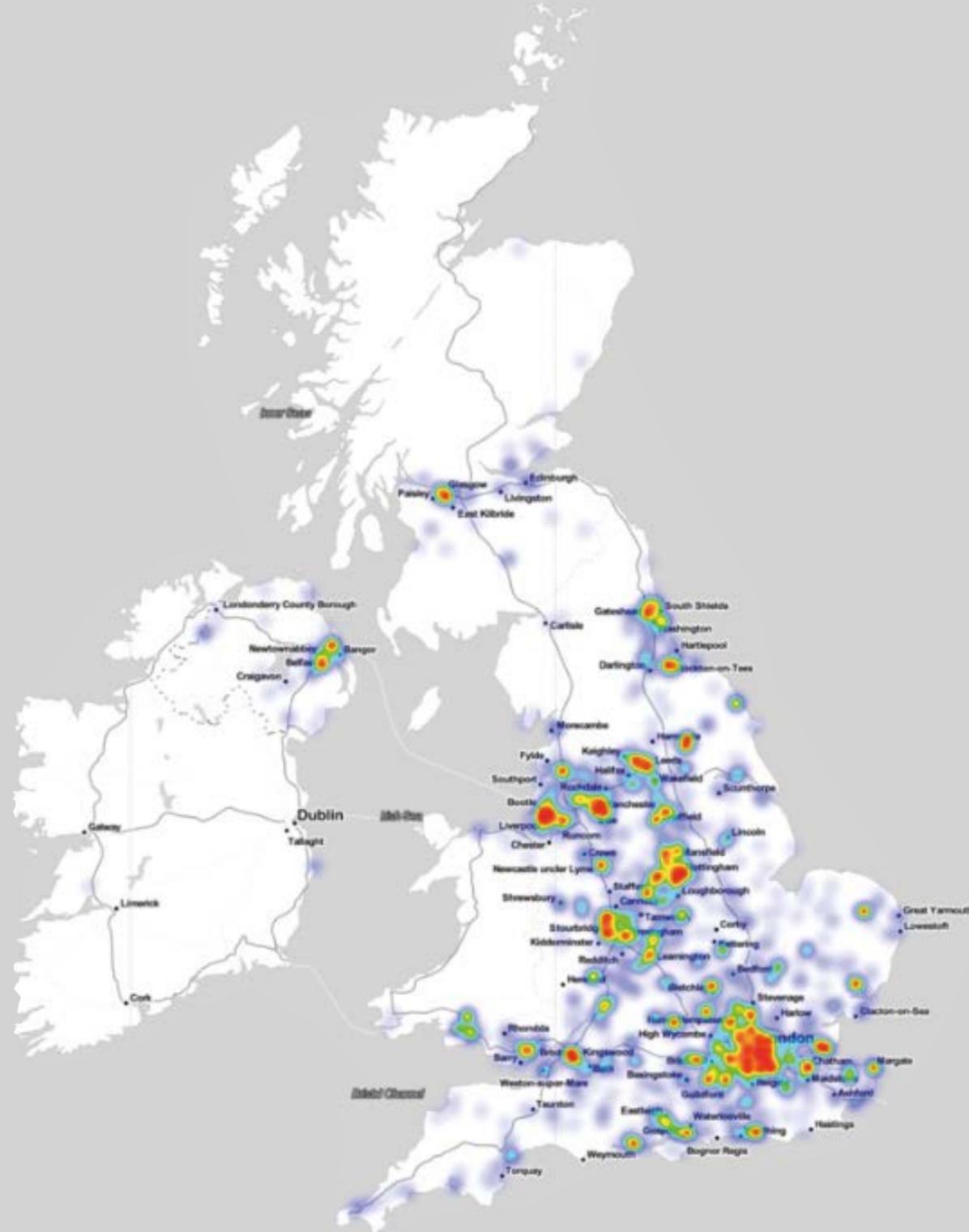
Anna, Norfolk
Safe Car Wash app user

“I really like the App - it's simple and easy to use and gets some important information straight to the people who need it. Perhaps more importantly it makes people stop and think about their behaviour and if it is contributing to the exploitation of others. I'd recommend everyone download it and use it.”

Mike, Lincoln
Safe Car Wash app user

Figure 2

Car wash reports using the Safe Car Wash app, June - December 2018



(Source: Safe Car Wash app, 2018)

Patterns of reporting

Figure 2 (left) demonstrates the initial spread and intensity of reports submitted from the Safe Car Wash app between June 2018 and December 2018. In this study we have focussed on the reports rather than exact car wash locations for a number of reasons. Within the dataset there were duplicate location reports (as one might expect for a car wash causing concern). We also found that some users chose to submit their report from an alternative location, away from the car wash, so the geo-location did not always reflect the position of the car wash itself, an issue we pick up further in the analysis section. For this reason, it was sometimes difficult to clarify which points represented an accurate car wash location, without ground-truth verification of every data point, which was outside the scope of this research. However, it is important to recognise that statutory agencies are still able to draw effectively on the data to identify high-risk car washes, using local knowledge.

The map shows that there are a higher intensity of reports within some centres of urban population, as one might expect, but that intensity is not directly correlated with population size and density. For example, there appears to be a high intensity of reporting in and around Nottingham, compared to comparably-sized cities such as Bristol or larger cities like Manchester. In some more rural regions of the country, fewer reports were emerging than we might expect. Many significant market towns include at least one report, but not all (Hereford, Wetherby, and Bridgwater, for instance being

exceptions). Finally, Wales and Scotland were not specifically targeted in the initial marketing for the app, and this is probably reflected in the low number of reports from those areas.

There are a number of possible explanations for reporting being higher in some parts of the country than others. The first is that some (urban) areas simply have a higher density of car washes, and rural areas such as Exmoor, Yorkshire and Cumbria certainly show fewer reports. However, we know that car washes still exist in rural locations, so it is probable that some under-reporting is occurring, particularly as the 2000 plus entries in the data at this point will be an incomplete reflection of the total (estimated 10,000-20,000) car washes in the UK. Another potential reason is that awareness and thus usage of the app was higher in some parts of the country than others. For instance, Nottinghamshire is the national headquarters for one of the agencies involved in advising on the app, and The Clewer Initiative, and may therefore have had a higher number of regular users.

For the app to give a more accurate picture of distribution, it will be important to encourage users to pinpoint the car wash locations using the app, even if they do not have specific concerns or subsequently enter additional information at another site. The map also perhaps highlights the opportunity to promote the app further in rural regions, as well as Wales and Scotland, particularly given the church's unique capacity to reach into rural communities.

Reporting to the Modern Slavery Helpline

Although 41% of users were asked to call the Modern Slavery Helpline by the application, only 18% called the helpline and 82% did not. There were a total of 126 cases where the helpline was called, so the intensity of this type of report is much lower. **See Figure 3 (below).** Factors which seemed to encourage people to call the helpline are explored in the next section of this report.

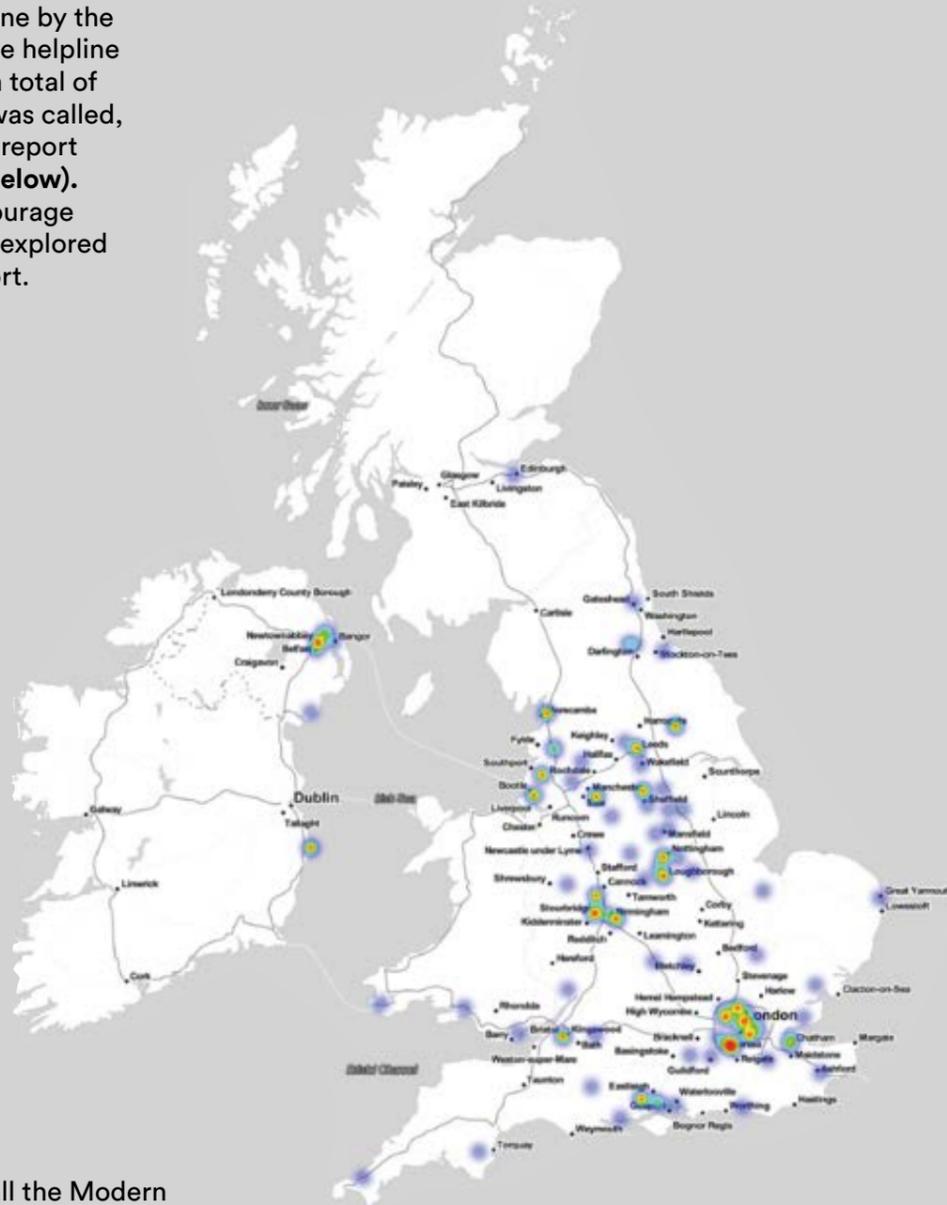


Figure 3
Users employing the app to call the Modern Slavery Helpline, June - December 2018

(Source: Safe Car Wash app, 2018)

CAR WASH SETTING

17% of users identified fearful workers at the car wash.

The Safe Car Wash app asked users if anyone appeared over-controlling or intimidating and if the body language of workers appeared fearful or withdrawn. 17% of reports identified fearful workers at the car wash. This aligns with research in which law enforcement officials described varying methods used to control workers^{vi}, including physical abuse, threats, coercion, debt bondage, withholding of wages and intimidation.

MINORS WORKING ON SITE

8% of reports logged children working on site.

Users were asked if there appeared to be minors working at the car wash. 8% of users logged children working on site. Generally, in the UK the minimum age a child can work is 13 years for part-time work and 16 years for full-time work^{vii}. School-aged children under the age of 16 are not entitled to the national minimum wage (NMW), while young persons over the age of 16 are entitled to a wage significantly lower than the NMW^{viii}. While employing children and young persons in car washes may not be unlawful, their age and cost of their labour increases their vulnerability to exploitation.

WORKERS LIVING ON SITE

14% of reports said that workers were living on the car wash site.

Research on the nature and prevalence of labour exploitation in the HCW sector reported that workers are housed in different accommodation types, some provided by their employers^{ix}. A key factor that may suggest worker

exploitation is their accommodation style. For instance, in some cases workers were reportedly found living on the car wash site in converted shipping and storage containers^x. The Safe Car Wash app asked users to look out for nearby caravans, containers, mattresses and bedding on site as evidence of workers living on site. 14% of reports suggested that workers were living on the car wash site.

ACCESS TO SUITABLE CLOTHING

48% of Safe Car Wash app reports commented that workers did not have access to suitable clothing.

Safe Car Wash app users were asked to look out for gloves and boots to determine if workers had access to suitable clothing. Reports on HCW activities have described workers operating with potential harmful chemicals used to wash cars, such as hydrochloric acid, and working in poor and unsafe conditions. Health and safety regulations require employers to take practical steps to manage health and safety risks and to protect workers from harm^{xi}. This includes providing workers with appropriate personal protective clothing and equipment. 48% of Safe Car Wash reports commented that workers did not have access to suitable clothing.

Because of the nature of the work, employees should be provided with adequate clothing and gear to protect them from harm such as safety shoes and gloves. Workers operating without personal protective equipment could indicate that employers are in breach of health and safety regulations.

FAIR PAY

The average price paid for a HCW service was £7.10.

Users of the Safe Car Wash app were requested to input the cost paid for the HCW service used. A low cost could indicate an exploitative business model where workers are paid below the national minimum wage (NMW). An assessment of the car wash industry by Waves, Tesco's HCW supplier, suggests that a breakeven cost for an outside wash is £6.88 including value added tax (VAT) and £11.10 including VAT for an inside and outside wash^{xii}. This takes into consideration a number of expenses including the cost of labour, materials and resources. Though these figures are likely to vary across the UK, the cost of a HCW service below this price could suggest that workers are not paid the NMW. The app did not identify the type of service users received at the car wash, however the average price paid for a HCW service was £7.10. Although this is higher than the estimated price for an outside wash by Waves, the price of a car wash service is not sufficient to determine the prevalence of exploitation, and other factors need to be taken into consideration such as the car wash setting, health, safety and working conditions and method of payment.

PAYMENT

80% of car wash visits had a cash only policy, 41% of users had to pay the manager directly and 87% were not offered a receipt.

The Safe Car Wash app asked users if the car wash only accepted cash, if a receipt was offered, and if they had to pay the manager. These variables could suggest that the car wash is evading tax, national insurance and NMW obligations. 80% of responses entered in the Safe Car Wash app stated that the car wash had a cash only policy, while 41% had to pay the manager directly. Further, 87% reported that they were not offered a receipt.



Modern slavery reporting

41% of users were requested to call the Modern Slavery Helpline. Of these 18% called the helpline and 82% did not.

Research on exploitative labour and employment practices in HCWs have reported a spectrum of abuse. While workers may be subject to some form of labour or employment violation, others may be victims of modern slavery. Users of the Safe Car Wash app were prompted to report their concerns to the Modern Slavery Helpline (MSH) if there was a high likelihood that exploitation is occurring at the car wash. Users were also encouraged to contact the police if they saw something of immediate concern.

Figure 4 (right), demonstrates the average price of the car wash service and the risk factors entered by users, who were subsequently prompted by the app to call the Modern Slavery Helpline.

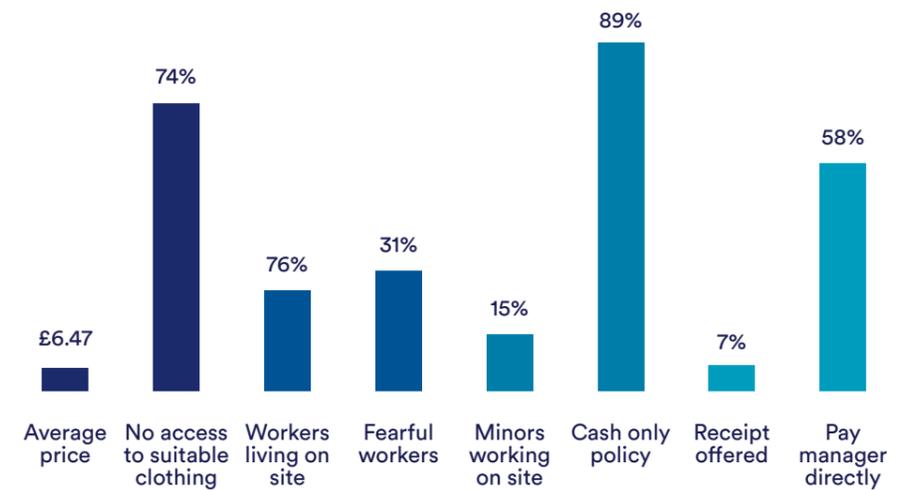
A cash-only policy and paying the manager directly were the most commonly identified features of settings in which user entries suggested a high level of risk.

However, many users chose not to call the helpline using the app, although we don't know if they subsequently called using

another means. We need to conduct more research to understand why this may be, but the data suggests that some features were perceived as more worrying than others. **Figure 5 (right)** illustrates the comparison between data entered by users who called the MSH when prompted to do so, and those who did not call. The price paid for the car wash service was similar for both users. The average price paid by users who did not call the MSH is £6.50 and £6.36 for those who did call.

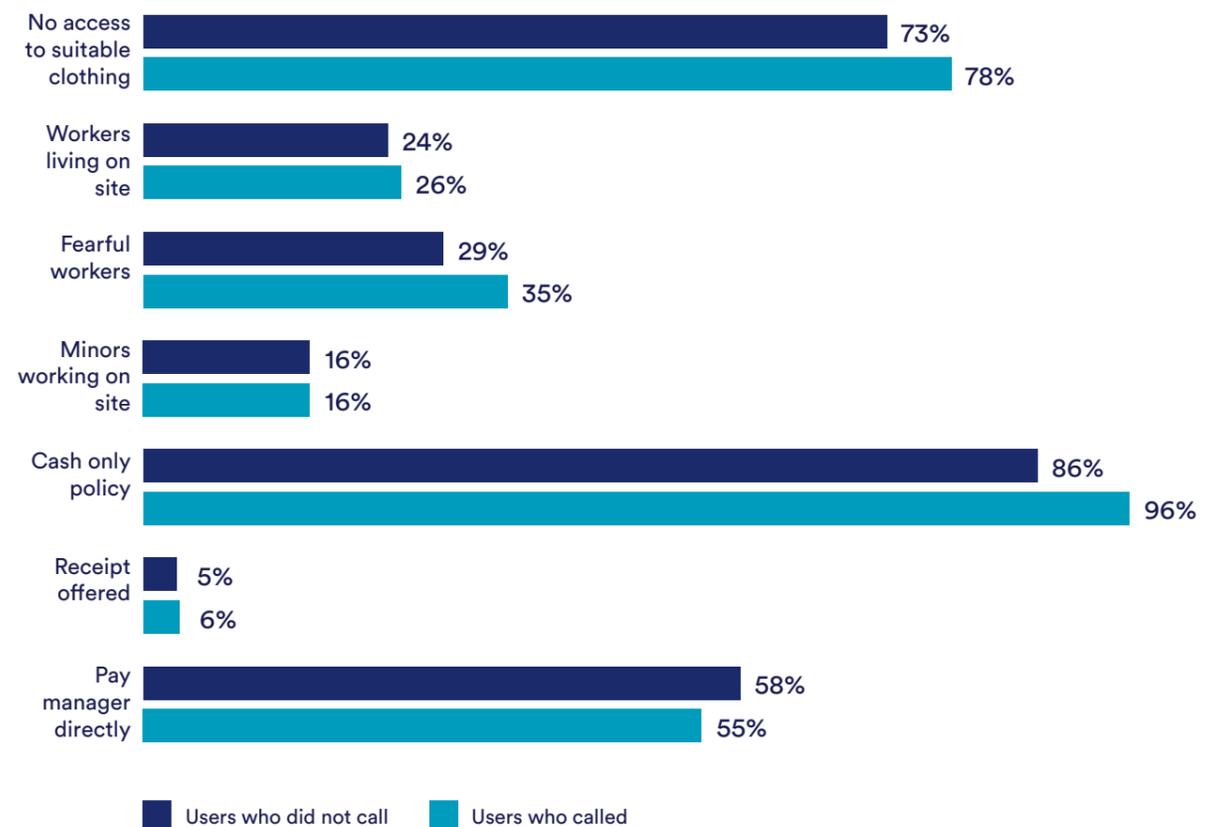
Factors such as the average price of a car wash service, minors working on site and receipt offered showed similar data entries by users who did not call the helpline and those that did. However, the cash only policy and the presence of fearful workers were higher for those who called the helpline in comparison to those that did not. This suggests that the factors most likely to influence users' attitude towards modern slavery reporting in car washes are cash only policy at a car wash, the presence of fearful workers and workers operating without suitable clothing.

Figure 4
Risk factors identified by users who were prompted by the app to call the Modern Slavery Helpline



(Source: Safe Car Wash app, 2018)

Figure 5
Risk factors comparison between users who called the MSH and those who did not call



(Source: Safe Car Wash app, 2018)

Analysis

This study demonstrates the potential of the Safe Car Wash app as a means to record data and raise awareness of signs of modern slavery and labour exploitation, but further development of the app could overcome some existing limitations. In addition, this study is a snapshot based on five months of usage. We know that the car washes featured in these reports are at present just a sample of the car wash industry, which is estimated to include between 10,000 and 20,000 businesses. A longer-term study with further contextual data, including a ground-truth reality-check to look at the app's effectiveness in logging car wash locations, and experiences of law enforcement agencies in utilising intelligence, would provide valuable additional information.

In the short term, some further adaptations could improve the utility of the app for data collection and mapping. These include giving users the opportunity to review data before submission, providing more detailed categories for the type of service received, and adding the capacity to log the location and name of a car wash without making a full data entry. The Clewer Initiative and the Santa Marta Group may also wish to consider whether to give new recommendations on the use of the app, encouraging individuals to

log location of car washes even if they do not use the services provided, in order to gain a fuller picture of the industry as a whole.

However, while the app seeks to inform law enforcement, it also aims to raise awareness of modern slavery in car washes to members of the community. Consequently, it is important that any changes that seek to improve the app as a data collection tool do not diminish users' experience and deter individuals from using the app.

The higher number of persons who did not contact the Modern Slavery Helpline when prompted to do so - in comparison to those who did - demonstrates that more needs to be done to understand the factors that influence public reporting of abuses. Research on local media and public perceptions of modern slavery highlighted several concerns that hinder public reporting of modern slavery cases, such as the lack of sufficient information to be able to confidently report on behalf of potentially exploited persons and the concern that reporting might make matters worse for workers^{xii}.

Conclusion

Gathering data on the scope of the hand car wash sector in the UK is pivotal to tackling abuses in this sector. The Safe Car Wash app provides important emerging evidence to build our knowledge of HCWs including their geographical spread and the prevalence of modern slavery risk factors. Although in its early stages, the data arising from the Safe Car Wash app also has potential to provide further insight into HCW activities by mapping car wash operations.

There are also likely to be benefits of this app which are not yet captured by this data, including the extent to which the app has raised users' awareness of exploitative labour practices and promoted a public conversation about labour abuse in car washes. This conversation is now starting to yield important policy changes, such as moves towards national and local regulation.

“

The Clewer Initiative and the Santa Marta Group recognised the risks in the car wash industry. Mobilising their respective parishes to gather data through the Safe Car Wash app has resulted in a Parliamentary Committee Inquiry now looking to regulate the industry to prevent forced and exploitative labour in the industry”

Kevin Hyland OBE

First UK Independent Anti-Slavery Commissioner (2015-2018)

While more work needs to be done to improve public reporting, the Safe Car Wash app demonstrates the importance of citizen science in shedding light on pernicious practices, particularly in sectors where exploitation is often described as 'hidden', yet thrives in plain sight. Leveraging the real life experiences and insights of the public can act as a catalyst for change by broadening our understanding of the nature of car wash activities, the prevalence of labour exploitation and modern slavery, and building essential evidence for the approaches needed to tackle abuses.

Appendix

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- ii Akilah Jardine, “Labour exploitation in hand car washes,” (2018) University of Nottingham, accessed December 14, 2018
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You can find more information on the work of The Clewer Initiative and Santa Marta Group on their websites.
www.theclewerinitiative.org
www.santamartagroup.com



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