



Gangmasters &
Labour Abuse Authority

GLAA Q2 Performance Report

Reporting period: Q2 July - September 2019

YTD April 2019 – September 2019

Previous year April 2018 - March 2019



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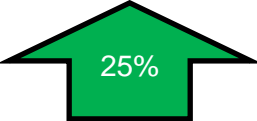
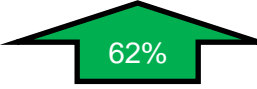


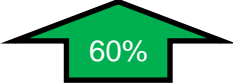

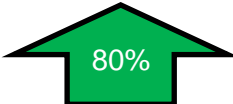
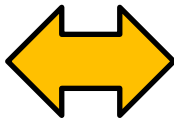
Gangmasters & Labour Abuse Authority


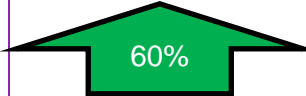

Business Plan Objectives

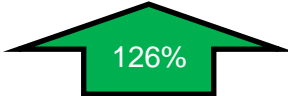


Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (% comparison to half-yearly average)
1. Identify and support victims of labour exploitation	To work towards prioritising victims as part of our investigations	Potential victims assisted (directly/indirectly)	<p>Potential victims identified as part of enforcement activity - 1,658</p> <p>Potential victims of licensing standard breaches identified – 5,738</p> <p>Potential victims providing intelligence to the GLAA – 154</p> <p>Total = 7,550</p>	To increase the effective identification by 10%	<p>Potential victims identified as part of enforcement activity - 784</p> <p>Potential victims of licensing standard breaches identified – 3,324</p> <p>Potential victims reporting intelligence to the GLAA – 49</p> <p>Total = 4,157</p> <p></p>
			NRM submissions = 33 (plus 13 assists)	To increase the overall number of NRM and MS1 referrals by 10%	<p>NRM submissions = 7 (plus 12 assists)</p> <p></p>

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (% comparison to half-yearly average)
			MS1 submissions (duty to notify) = 34 (plus 19 assists)		MS1 submissions = 32 (no assists) 
		Numbers of Tier 1 resolution	72 (i)	To increase by 20%	Tier 1 resolutions = 28 
		The overall number of workers affected	53 (i)	To increase by 20%	Number of workers = 1,668 
		Withheld wages and Holiday pay recovered	Withheld wages = £2,134 Holiday pay = £13,823	To increase by 25%	Withheld wages = £1,963.65  Holiday pay = £92,048.88 



Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (% comparison to half-yearly average)
			A further £3,286.23 does not differentiate between.		A further £46,492.03 does not differentiate between. £14,896.46 'other' e.g PPE, non-monetary, and non-GLAA sector recoveries made which exceed the 2018-19 quarterly average.
2. Maintain a credible licensing scheme, creating a level playing field and promoting compliant business growth	To address the time it is taking to process a licence application, ensuring this is kept to the standard	Days taken to complete licensing applications, broken into sections of process from the licence fee being cleared to the licensing decision being made	Average for 18/19 = 76 Working days	The overall target is by March 2021 to reduce the average of 50 days The Mid-point target is 68 days by March 2020	Average of 2019-20 (19-20 tasked cases only) – 57 days 
	To review the time taken to complete a compliance investigation, allowing us to target persistent non-compliance	Days taken to complete compliance investigations, broken into sections, from date raised to report submitted to licensing for a decision	Average 18/19 = 185 days	The overall target is to reduce to 90% in 90 days by March 2021 The mid-point target is to reduce to 90% in	Average of 2019-20 (19-20 tasked cases only) – 70 working days 

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (% comparison to half-yearly average)
	in the regulated sector			166 days by March 2020	
	To review time taken to make licensing decisions	Days taken to make licensing decision once all information is available	Revocation = 15 days ALC = 10 days Straightforward grant of Licence = 5 days	To Improve by 10% to 14 days, 9 days, and 4 days respectively	Revocation = 6 days  ALC = 1 day  Straightforward grant of Licence = 1 day 
3. Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation	To enhance engagement with key stakeholders within sectors deemed at high risk of labour exploitation, based on the nature and scale of those risks as assessed by	Numbers of protocols resulting from direct GLAA engagement	3	5 To add two new protocols in the coming year	Number of protocols = 3 
		Number of businesses signed up to protocols	Construction = 76	Construction = 100	Construction = 144 members ●

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (% comparison to half-yearly average)
	GLAA intelligence		Apparel = 16 Retail = 3	Apparel = 40 Retail = 6 To increase the number of signatories on each linked to measure below	Apparel = 18 members ● Retail = 3 ●
		Increase in the volume of intelligence submissions from those sectors	Construction = 71 Apparel = 10 Retail = 7 (ii)	An increase of 25% in the percentage of actionable intelligence	Construction = 18*  Apparel = 8*  Retail = 1* 

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (% comparison to half-yearly average)
					*Please see level of General Issues/Referrals for another measure indicating increases across all 3 sectors.
	To increase awareness of modern slavery and labour exploitation through external training, engagement with stakeholders and amplifying messaging using social and traditional media	GLAA's level of activity across digital engagement channels and the accumulated reach	2,765 pieces of activity Average monthly impressions (no. of times content is displayed) 287,000	To increase the reach of social media by 5%	Average monthly impressions = 649,363 
4. Disrupt and deter criminal activity within the labour market	To work to increase the number of GLAA led enforcement investigations, whilst maintaining our work in partnership	Investigations undertaken by GLAA lead Investigations Undertaken in Partnership	No Undertaken =179 No Undertaken = 81	To maintain baseline To maintain baseline at approximately 40% of cases	Enforcement & NSO investigations = 107  % of investigations in partnership = 50% 

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (% comparison to half-yearly average)
	To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations	GLAA-led convictions Sanctions	Convictions = 6 LMEU = 15 LMEO = 2 Warnings = 31 Enforcement Notices = 17 Cases Referred to CPS =16	To increase all by 10% New Measure - 80% of cases referred which result in meeting evidential threshold- New Measure- 70% of those case which meet evidential threshold result in positive charging decision-	Convictions = 3 (+16 other) LMEU = 3 LMEO = 0 Warnings = 9 Enforcement Notices = 20 Cases referred to CPS = 3 Cases currently with CPS = 9
	To make use of financial investigation powers in investigations	Number of investigations featuring proceeds of crime investigations (POCA)	No = 1 Value = £41,300	To improve on the baseline	Number = 0
5. Develop our people and culture in line with the GLAA's PROUD	To improve retention levels, increase diversity and increase	Performance effectively managed and meeting with line manager.	81% agree /strongly agree.	To improve on 2018 baseline	No available results

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (% comparison to half-yearly average)
values, ensuring a diverse, resilient and change-ready organisation	satisfaction of GLAA employees	Proud to work for the GLAA	Baseline 94%	To maintain 2018 baseline	No available results
		Treated with fairness and respect	Baseline 84%	To Improve on 2018 Baseline	
		Average sickness rates	3.42% (public sector 2.9%)	To maintain or improve on 2018 and move under the public sector average	New CIPD/ONS measure from April 2019 is 3.54%. 2019-20 YTD % working days lost = 3.50%
					
		Average people turnover	11.2% (public sector 13.3% (2018))	To maintain or improve on 2018 and remain under the public sector average	2019-20 Q2 YTD = 10.7%
					
	To move closer to the national public sector workforce figures based on gender and ethnicity	Gender female 38% Public sector average 46%	Gender female 38% Public sector average 46%	To improve on 2018 baseline and get closer to public sector averages	Gender female 40% Public sector average 46%
		Ethnicity (BAME) 5.8% public sector Average 9.9%	Ethnicity (BAME) 5.5% (47.5% of employees prefer not to say) public sector average 9.9%		

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (% comparison to half-yearly average)
		Number of personnel that have a personal development discussion with manager	Wasn't measured in 2018	New Measure 95% of personnel to have discussion	No available results
6. Provide efficient and effective services, sound governance, robust risk management and value for money	To deliver a balanced budget, deliver on savings targets	Performance against budget	Add percentage variance as at end of March 2019 Savings target 300K	To improve on baselines Current projected overspend is £300k to monitor savings plan to bring underspend to zero	Awaiting analysis
	To improve on Internal Audit view of GLAA	End of year overall audit opinion	Anticipated to be limited	Moderate	Awaiting results
		Responses to audit recommendations within agreed timeframes	Percentage of high and medium actions completed by due date	80% of actions completed by due date	Awaiting results
		Internal audit opinion on risk management	Limited	To move audit risk opinion to Moderate	Awaiting results

- (i) Operational constraints meant that Tier 1 resolutions were only carried out for part of the year we have extrapolated them out for a full year.
- (ii) The construction and garment protocols were signed during the course of 2018 following which there was enhanced intelligence from those sectors

PREVENTION

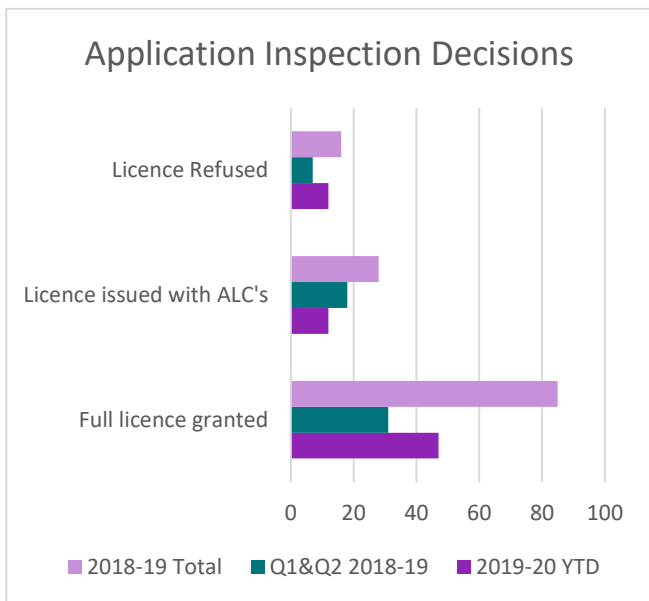
Strategic Priority: Preventing Worker Exploitation

- *Maintain a credible licensing scheme;*
- *Creating a level playing field and promoting growth;*
- *Engage with stakeholders to minimise and manage risk;*
- *Manage risk and support compliant business*

Licensing

Currently there are 1039 GLAA licence holders supplying workers to the GLAA regulated sectors. This is an increase on both the 2018-19 end of year total of 1017 in April 2019, and the 1033 at the end of Q1 2019-20. 78 new licence applications have been made this year to date, with 37 being made in Q2. 81% of licence applications this year to date result in a full licence being granted.

Licence applications initiated		
April 2018- March 2019	April – September 2019-2020 YTD	% change from April 2018 - March 2019
176	78	13.3% ↓
Average 15 per month	Average 13 per month	



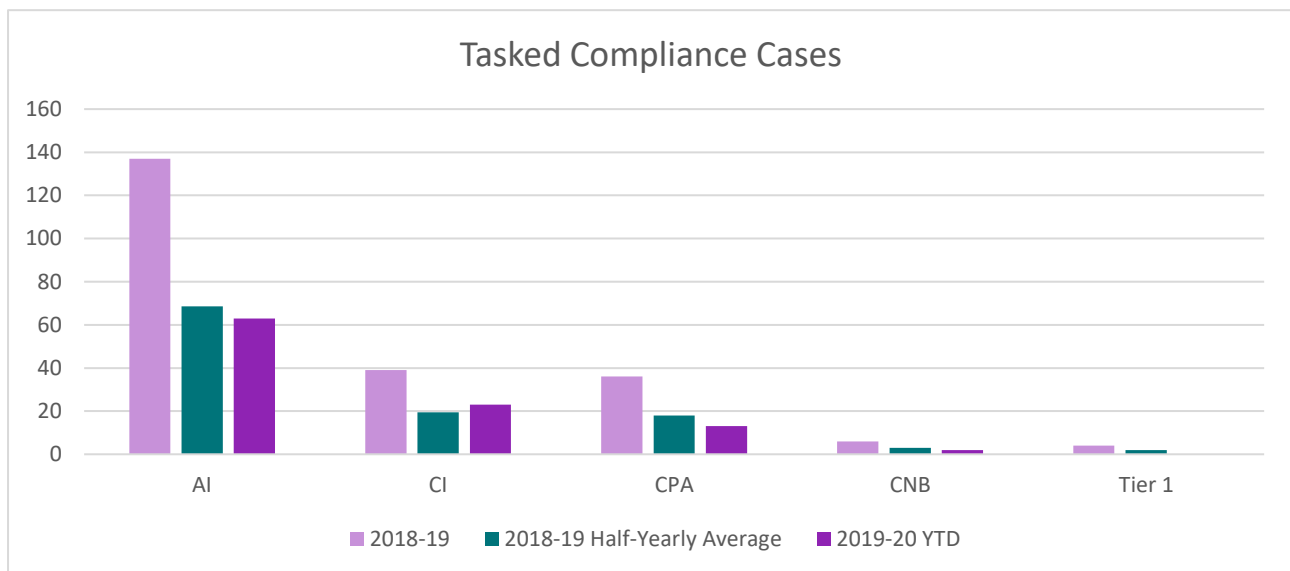
A total of 21 licences were revoked **without immediate effect** during 2018-19. When compared to 2019-20 YTD, the number is 15. This indicates an increase of 42.9% when compared to the half-yearly average. 3 licence revocations without immediate effect occurred in September 2019, 2 of which commenced following an application to change the principal authority on the licence.

The below table indicates the time taken to make a licensing decision on an application inspection once all information is available

Compliance

Compliance Cases tasked			
April 2018 – March 19 End of Year Total	April - September 2019	% change from April 2018 - March 2019 half-yearly average.	% change from Q1 2019-20
222	101	9% ↓	15% ↑

There has been a 9% decrease in the number of compliance cases tasked between April-September 2019 on average when compared to the half-yearly average for the previous year.



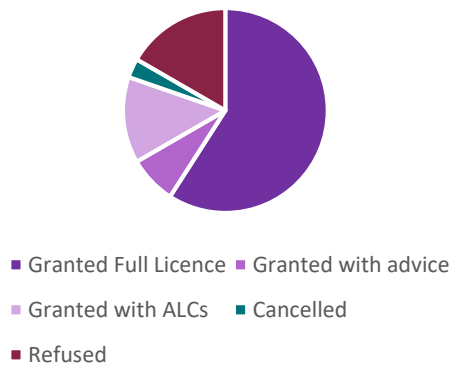
Open compliance cases

There are currently 90 live compliance cases, 9 more than in Q1, 44% of which are CIs and 41% are AIs.

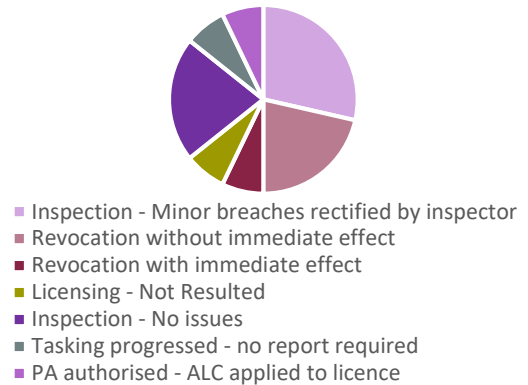
Closed cases by type

6 of the compliance cases tasked this year to date have been finalised. As this leaves minimal closure types for analysis, research has taken place on all 91 compliance cases that have been finalised this year to date, which includes those which will have been tasked before April 2019.

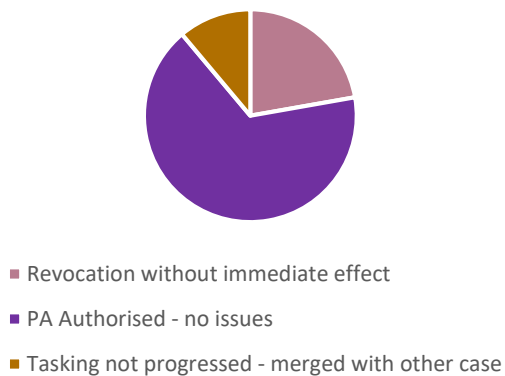
66 AI Closures 2019-20 YTD



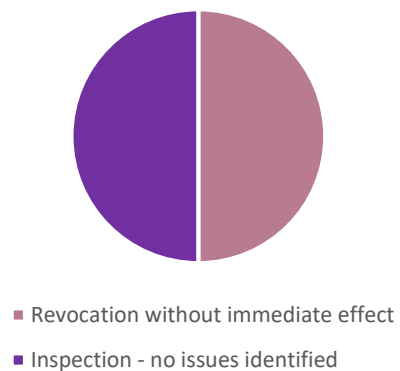
14 CI Closures 2019-20 YTD



9 CPA Closures 2019-20 YTD



2 CNB Closures 2019-20 YTD



Breaches identified

	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Total YTD
Breaches identified by inspector	20	32	20	32	35	24	163
Total 2018-19							173

	Apr - 19	May - 19	Jun - 19	Jul - 19	Aug - 19	Sep - 19	2019-20 YTD
Licensing breach with inspection	2	21	6	7	5	7	48
Licensing breach without inspection	0	1	5	5	0	0	11
Total (2018-19) = 123							Total = 59

Communications

GLAA website

	Total users	Total sessions	Total page views
Q1 2019-20	24,744	34,653	104,918
Q2 2019-20	9,339	10,011	45,420

On 11/09/2019, a cookie consent form was introduced on the GLAA website which requires users to opt-in to their record of visiting the website being recorded. As this is an opt-in opposed to opt-out function, this has caused a dramatic fall in available data which is evidenced in the above and below tables in comparison to Q1. Social media stats remain unaffected.

Visits to website broken down by UK City – 2019-20 YTD (Top 10)

City	Users
London	8,854
(Location Not Set)	3,650
Nottingham	1,009
Birmingham	787
Leeds	753
Manchester	601
Liverpool	489
Bristol	426
Newcastle upon Tyne	408
Coventry	64

Social media breadth (September 2019)

	Number of followers
Twitter	4,159 (56 new followers in August)
Facebook	1,211 followers
LinkedIn	3,051 followers

Business Change

The GLAA's Strategy team were involved in 25 engagements with partner agencies and stakeholders from various sectors of the labour market this quarter, exactly the same number of engagements as seen in Q1.

GLAA operational officers were also routinely engaged in representing the GLAA at multi-agency events.

	No of Engagements (Business Change)	No of Engagements (Syndicate staff)	Reach (approx.)
April - 19	9	12	513 (excluding potentially thousands of radio listeners)
May - 19	7	5	528 (excluding potentially 6.79million radio listeners)
June - 19	9	3	428
July - 19	12	13	635
August - 19	2	8	292
September - 19	11	14	1,257
TOTAL	50	55	3,273

Freedom of Information (FOI) requests

The GLAA have received 23 FOI requests this year to date. 85% (18) of these were responded to within 20 days, 15% (3) were responded to outside of 20 days, 1 is ongoing, and 1 was not progressed as further information was requested but not supplied.

3 complaints have also been received, and all were responded to within 15 days.

11 parliamentary questions have been processed, and are published on the GLAA website.

PROTECT

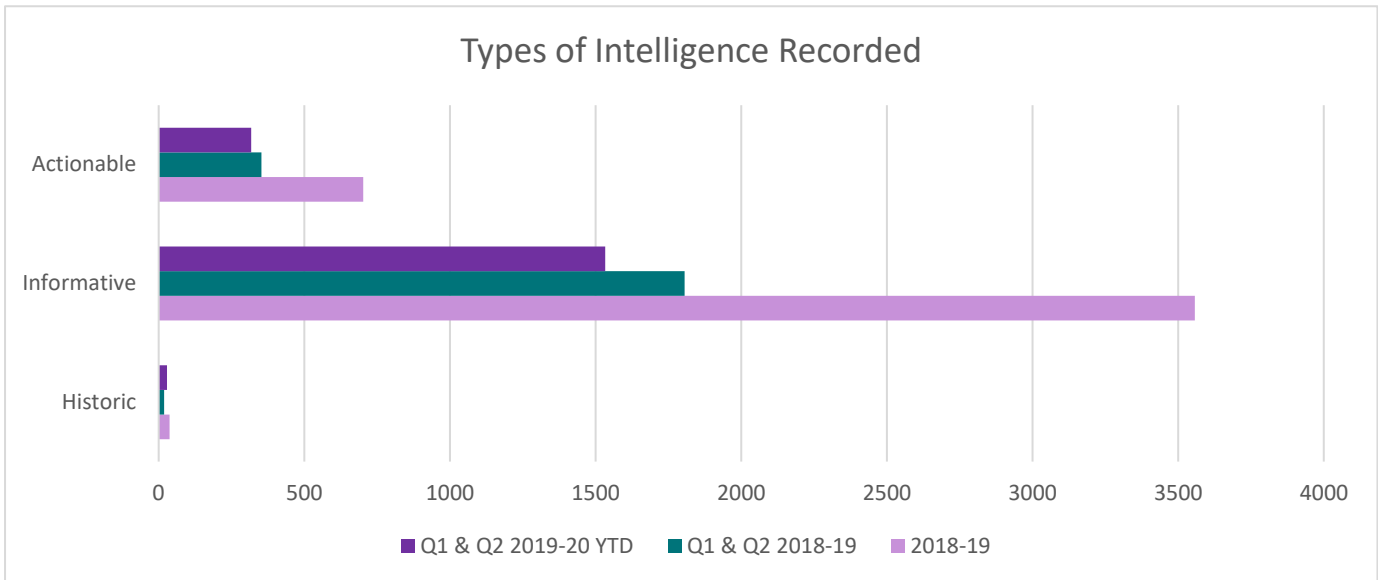
Strategic Priority: Protecting Vulnerable People

- Identify & support victims of labour exploitation;
- Work in partnership to protect workers' rights;
- Prevent labour exploitation

Intelligence

The GLAA is an intelligence-led organisation that receives intelligence in a variety of different sources such as partner agencies, industry and members of the public. This intelligence also arrives in several different formats, most frequently by email and telephone. The number of intelligence reports recorded in Q1 & Q2 is below both the amount recorded on Q1 & Q2 of 2018-19, and is a 12% reduction on the half-yearly average for 2018-19.

	Q1 & Q2 2018-19		2018-19		YTD Q1 & Q2 2019-20	
Intelligence Reports created	2,178		4,296		1,880	
GLAA Sector?	Yes	No	Yes	No	Yes	No
	645	1,533	1,334	2,962	617	1,263
Modern Slavery Indicators	Yes	No	Yes	No	Yes	No
	151	2,027	308	3988	97	1,783



General Issues

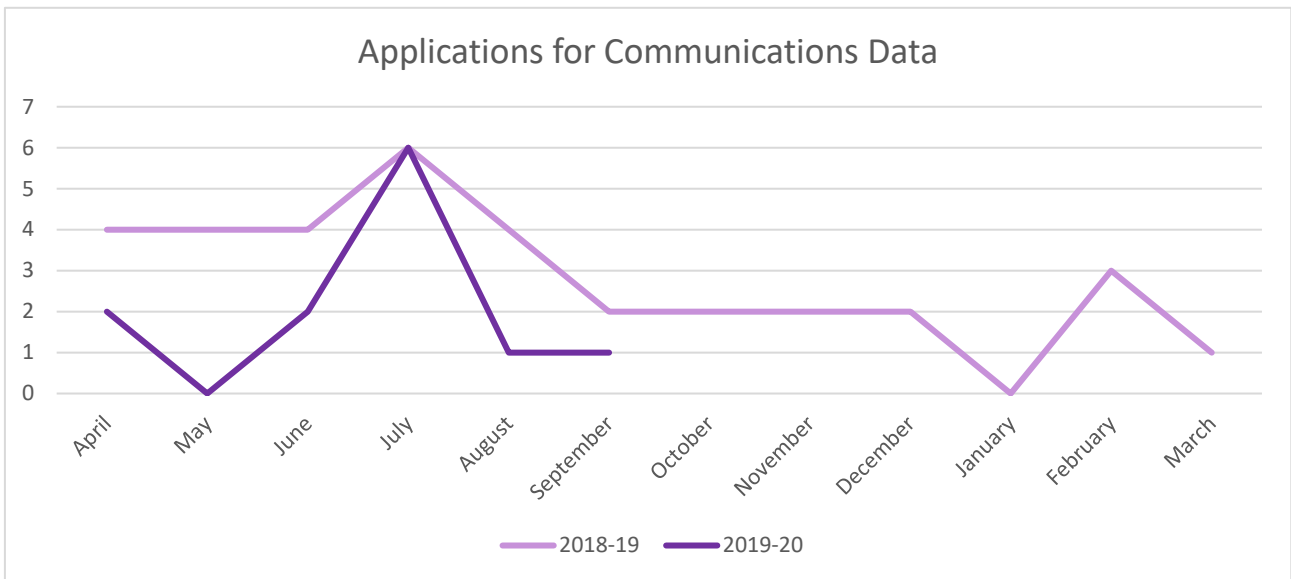
The number of referrals made to the GLAA regarding potential labour exploitation and modern slavery offences continues to increase.

There was an 11.1% (152) increase in the number of General Issues created between April and September 2019 when compared to the half-yearly average of the previous year.

	2018-19 Total	Total April – September 2019-20 YTD	% change from 2018-19 half-yearly Average
Created	2,737 (half-yearly average 1,369)	1,521	11.1% ↑

Communications Data

8 applications were made for communications data this quarter, which is an increase on the 4 made in Q1.



Identification and support of victims

	2018-19 Total	2019-20 YTD total	% change from 2018-19 half-yearly Average
Potential victims of labour exploitation/licensing breaches identified	7,550	4,157	10% ↑
Number of NRM Referrals made by the GLAA	33 (plus 13 assists)	7 (plus 12 assists)	17% ↓
Number of MS1 forms submitted by the GLAA	34 (plus 19 assists)	32 (no assists)	20% ↑

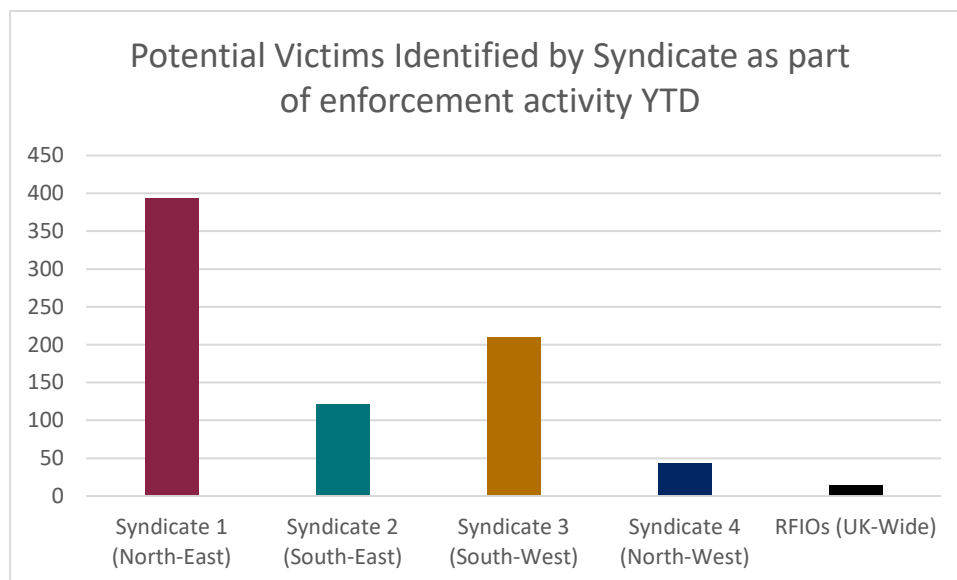
The GLAA's 2019-20 Business Plan target is to increase the identification of potential victims of modern slavery and labour exploitation by 10%, which is currently on course to being met. The GLAA 2018-2019 Q3 Performance Report referenced increased

resources, raised awareness and potentially increasing levels of labour exploitation as reasons for this.

Q2 has also seen an increase in the number of NRM referrals made, with 15 compared to 4 in Q1.

The number of MS1 forms submitted by the GLAA this quarter has also increased, with 11 submitted last quarter and 21 this quarter. The total submissions this year to date are a 20% increase on the half-yearly average for 2018-19.

% of potential victims of modern slavery or human trafficking identified that result in an NRM or MS1. (YTD)			
Potential victims of MSHT identified	NRMs made	MS1 forms submitted	% resulting in NRM or MS1
363	7 (plus 12 assists)	32	14.6%



Identification of victims continues to be the greatest in the North-East Syndicate, identifying 48% of potential victims in Q1, and 50% in Q2, and lowest in the North-West Syndicate (6%) excluding RFIOs. It is however recognised that GLAA Modern Slavery Act (2015) powers do not apply in Northern Ireland and Scotland in the North-West Syndicate.

The majority of potential victims encountered during this reporting period were Romanian, and exploitation was identified most commonly of workers working in the food processing/packaging sectors opposed to car washes, which featured heavily in Q1.

Tier 1 intervention

Tier 1 Resolutions		
2018-19 Total	2019-20 Q1 YTD	2019-20 Business Plan Target
72 resolutions	26 resolutions	86 resolutions
53 workers affected	1,668 workers affected	64 workers affected
Withheld wages = £2,134	Withheld wages = £1,963.65	Withheld wages = £2667.50
Holiday pay = £13,823	Holiday pay = £92,048.88	Holiday pay = £17,278.75
A further £3,286.23 – does not differentiate between.	Both = £46,492.03	
	A further £14,896.46 relates to other recoveries, such as refunded PPE payments, and non-regulated sector recoveries such as unpaid overtime.	

17 resolutions this year to date were made by the office-based intelligence team, and 11 were made by compliance, enforcement and licensing officers. The larger-scale recoveries tend to be made by compliance officers, as their resolutions are often the result of adverse intelligence affecting multiple workers warranting further investigation, opposed to isolated issues or a pay discrepancy affecting 1 worker.

Resolutions which occur for workers working outside of GLAA-regulated sectors, but with GLAA-licensed agencies, are included in these figures. Non-monetary resolutions, in particular in relation to assisting with obtaining P45s for workers, have also been made this reporting period.

PURSUE

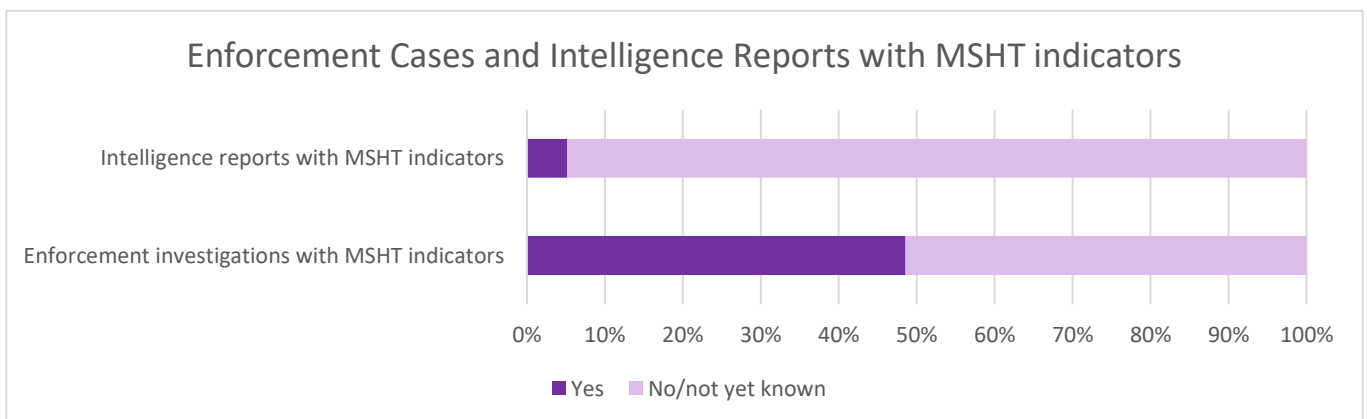
Strategic Priority: Pursuing those who exploit others for their work either financially, physically and or through coercion and control

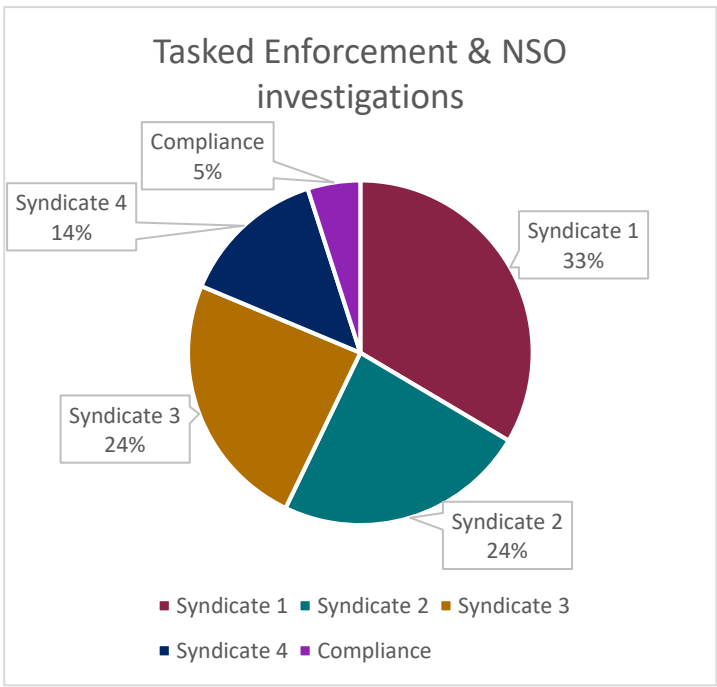
- *Disrupt criminal activity within the labour market*

Enforcement

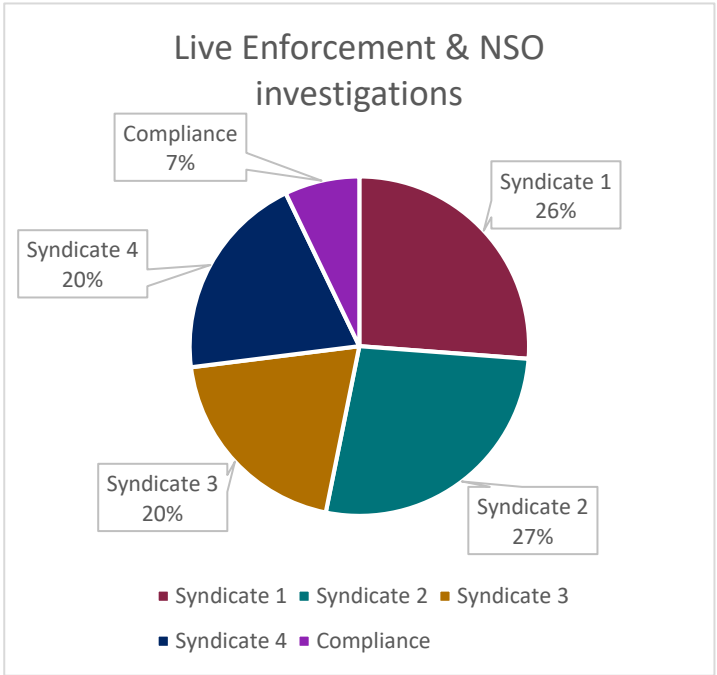
	2018-19 Half-yearly Average	2019-20 YTD	% change from 2018-19 Quarterly Average
Enforcement cases tasked	124	140	11.4% ↑
Non-standard operations (NSO)	29	42	31% ↑

51% of the enforcement cases tasked in Q1 of 2019-20 had indicators of modern slavery/human trafficking. This is followed by 47% of enforcement cases tasked in Q2.





Per the first chart to the left, the majority of enforcement and NSO cases in the first quarter of 2019-20 were in Syndicate 1 (North-East), followed by Syndicate 2 (South-East) and Syndicate 3 (South West).



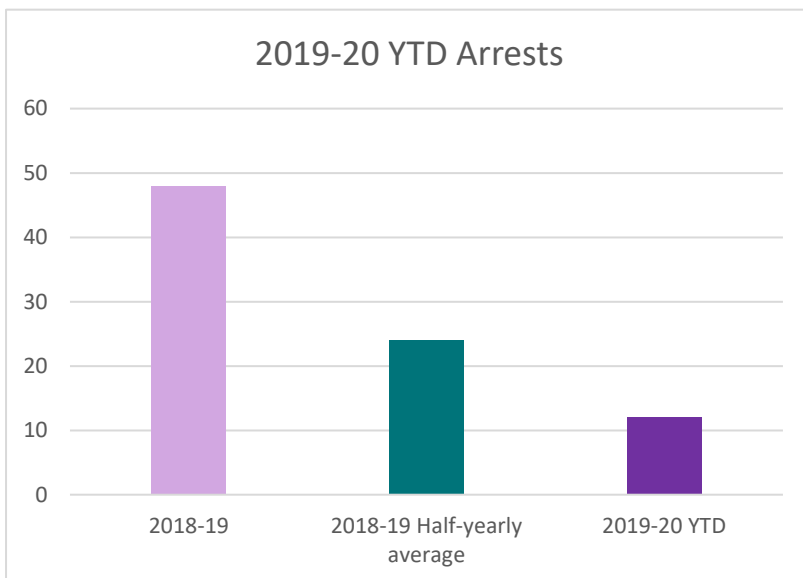
There are currently 126 live enforcement and NSO cases, an increase of 8 when compared to the end of Q1.

The most-long standing investigations are commonly in syndicates 2 (South-East) and 4 (North-West). This trend is in-line with the those syndicates who have the most number of cases currently with the Crown Prosecution Service, which commonly relate to the more long-standing investigations.

Enforcement cases tasked this reporting period cover a variety of sectors. The most common sector for investigations in Q1 was car washing, where there were marginally more investigations than in the food processing/packaging and agriculture sectors. In Q2, the most common sector for investigation was food processing/packaging, followed by hotels/restaurants & food service, followed by agriculture.

50% of all enforcement and NSO cases tasked this quarter involved some level of joint working.

Arrests and Warrants



This year to date, there have been 12 arrests, 5 of which were in Q2.

April-September 2019 Enforcement case closures					
	Syndicate 1	Syndicate 2	Syndicate 3	Syndicate 4	Total
Prosecution – all parties	0	0	0	3	3
Warnings	5	1	5	1	12
LMEU	3	0	0	0	3
LMEO	0	0	0	0	0

Glossary of Terms

GLAA	Gangmasters and Labour Abuse Authority
AI	Application Inspection
ALC	Additional Licensing Conditions
CARD	Crimson Allocation Record Sheet
CI	Compliance Inspection
CNB	Compliance- New Business Inspection
CPA	Change of PA Inspection
Crimson	Case Management System
ENF	Enforcement Tasking
ENRS	Enforcement Tasking – Non-Regulated Sector
ERS	Enforcement Tasking – Regulated Sector
General Issue	Record of referrals to the GLAA
MS1	Duty to Notify the Home Office when a potential victim of modern slavery is identified & does not consent to the NRM
MSHT	Modern Slavery/Human Trafficking
NFA	No Further Action
NRM	National Referral Mechanism
NSO	Non-Standard Operation
NTT	Non-Triaged Tasking
OCDA	Office for Communications Data Authorisations
OCG	Organised Crime Group
POCA	Proceeds of Crime Act
RIPA	Regulation of Investigatory Powers Act 2000
SIO	Senior Investigating Officer
SPoC	Single Point of Contact
Syndicate 1	North-East
Syndicate 2	South-East
Syndicate 3	South-West
Syndicate 4	North-West
Tier 1	Monetary or Non-Monetary Resolution for Worker
YTD	Year to Date