



Gangmasters &
Labour Abuse Authority

GLAA 64/12 End of Year Performance Report

Public Facing

Reporting period: April 2018 to March 2019

Previous Year- April 2017-March 2018

Business Plan Objectives

Aim	Measure	April 2018-March 2019	
To work to increase the number of GLAA-led enforcement investigations, whilst maintaining our work in partnership	Active and closed GLAA led enforcement investigations	Active	Currently 147 active enforcement operations.
		Closed	478
To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations	Sanctionable outcomes by type	Convictions	6
		Warnings	31
		LMEO	2
		LMEU	15
		Enforcement notice	17
To make use of financial investigation powers in investigations	Number of times POCA used in operations	1 (£41,300)	
To expand the GLAA outreach to engage with a larger number and more diverse range of stakeholders	Number of protocols and % of organisations signed up to protocols	Construction protocol (88 signatories) The Apparel & General Merchandise Public & Private Protocol (Textiles) (15 signatories)	
To prioritise engagement with stakeholders	Number of sectors which saw an increase in intel reports after GLAA engagement at an event		
To ensure all licensing queries are responded to within 5 working days.	% of sample responded to in 5 working days	Jan-80% Feb-87% March-80%	

Aim	Measure	April 2018-March 2019	
To work to increase the number of enforcement investigations undertaken in partnership, whether GLAA or partner led	Number of joint working cases	147	
To address the time, it is taking to process a licence application, ensuring this is kept to the standard	% completed within 30 days	Jan-27% (others average of 41 working days) Feb- 13% (others average of 37.8 working days) Mar- 0% (others average of 46.9 working days)	
To review the time taken to complete a compliance investigation, allowing us to target persistent non-compliance in the regulated sector	% completed within 30 days	0%	
To work towards prioritising victims as part of our enforcement investigations	Victims identified by type and referrals	Potential victims identified	1658
		NRM*	33 (Jan-Dec 2018)
		MS1	34
To be compliant with the Victims Charter requirements		New objective - currently working out the measurement to capture this	
To raise awareness of the signs of modern slavery by providing external training		89 engagements, reaching an audience of over 7,000 *Please note Data only captured from October 2018 onwards*	

* The above number does not include where the GLAA has assisted other agencies in recovery of victims and subsequent referral

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
DSA	Directed Surveillance Authority
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
NRM	National Referral Mechanism
NSO	Non-standard operation
OCDA	Office for Communications Data Authorisations
OCG	Organised Crime Group
POCA	Proceeds of Crime Act
Syndicate 1	North-east
Syndicate 2	South-east
Syndicate 3	South-west
Syndicate 4	North-west
YTD	Year to Date

PREVENTION

Strategic Priority: Preventing Worker Exploitation

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

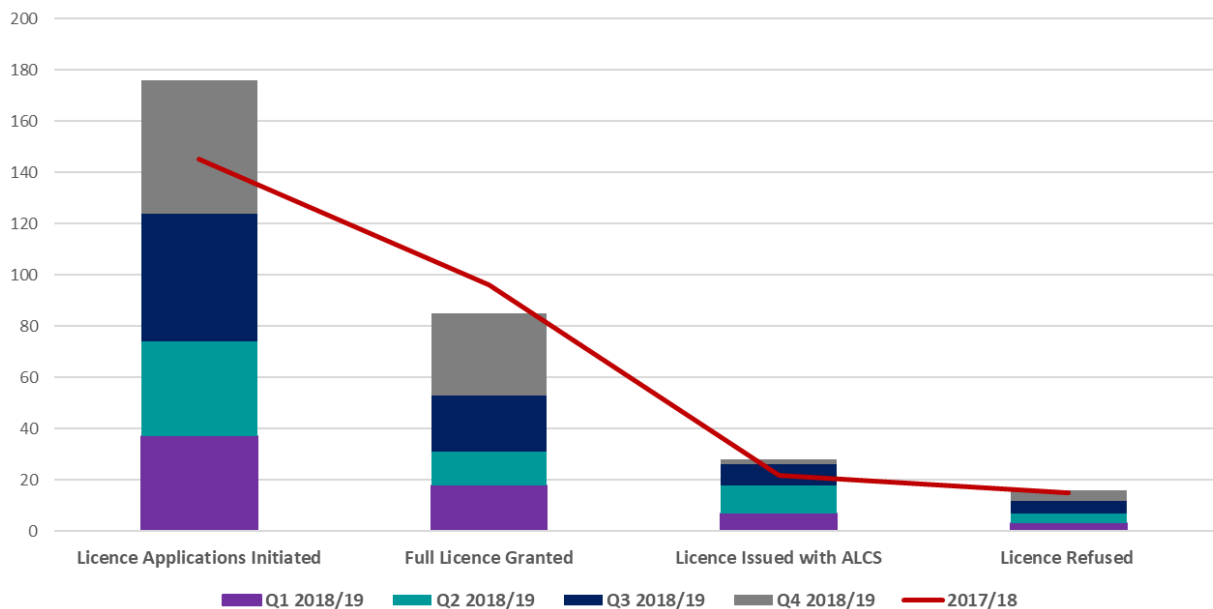
Licensing

Licence Applications and Decisions

There are currently 1017 GLAA licence holders supplying workers to the GLAA regulated sectors. This is consistent with the previous year's total. There continues to be a consistent stream of licence applications; on average 14.6 a month and increasing by 21% when compared to the previous year.

Licence applications initiated	
2018/19	% change from 2017/18
176	↑ 21%

The majority of licence applications result in a full licence granted. There has been a slight increase in the number of licences issued with ALC's when compared to the previous year and the number of licence refusals has remained consistent.

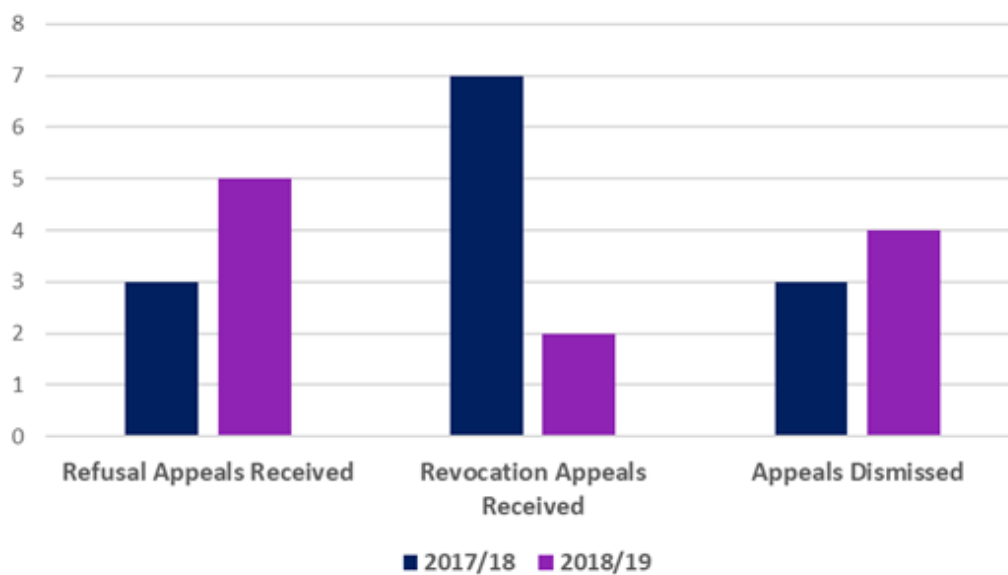


Revocations


- No licences were revoked with immediate effect during 2018/19 (there were 3 during 2017/18).
- 20 licences were revoked without immediate effect, increasing from the previous year wherein there were 13.

Appeals

During 2018/19 there has been a decrease in the number of appeals received in response to a revocation. There has been a small increase in the number of appeals received in response to a refusal.

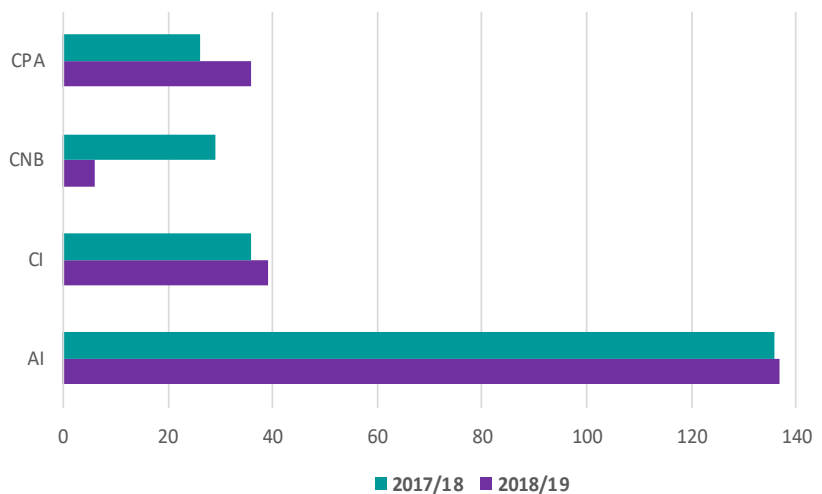


Compliance

Compliance Cases tasked	
2018/19	% change from 2017/18
218	 4%

The number of application (AI) and compliance inspections (CI) remains consistent this reporting period when compared to the previous year.

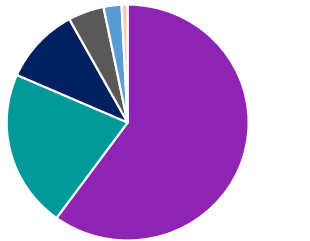
The number of new business inspections (CNB) decreased this reporting period.



Closed cases by type

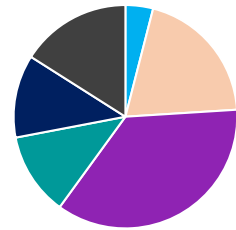
197 compliance cases were finalised during the reporting period and the outcome generally indicates compliance of licensed labour providers.

AI's closed by type



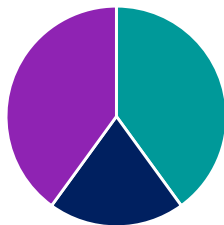
- Licence Granted- Full
- Licence Granted with ALCS
- Licence Refused
- Application Cancelled
- Licence granted-advice given by inspector
- No offences disclosed

CI's closed by type



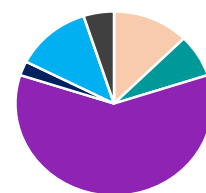
- CI closed
- Inspection-No Issues
- Inspection- minor standards rectified by Inspector
- Licence Granted-Full
- Tasking Progressed- No report required
- Inspection-ALCS
- Revocation without immediate effect

CNB closed by type



- Inspection-No Issues
- Tasking Progressed- No report required
- Inspection-ALCS

CPA closed by type



- Tasking Progressed- No report required
- Tasking not progressed
- PA authorised- no issues
- PA authorised- minor standards breach
- PA authorised- ALC applied
- PA refused- licence revoked

Business Change

The GLAA has undertaken numerous engagements with stakeholders, across various sectors, raising awareness of modern slavery and labour exploitation. Over recent months the GLAA has been engaged in ongoing work in Malta developing training processes based on the GLAA model and also had an input into academic research within the NCA.

Work has also been undertaken to promote current protocols and pilot licensing schemes.

Furthermore, syndicate staff have delivered presentations and training to various audiences including participation in police training events and presentations to retailers.

Such engagements have reached in excess of 7,000 people, both in the UK and overseas.

Please note, Business Change stats were not provided before October 2018.

	No of engagements (Business Change)	No of engagements (syndicate colleagues)	Reach (Approximate)
Q3 2018/19	39	42	3,930
Q4 2018/19	50	107	3,448
Total	89	149	7,378

Complaints

During February and March 2019, four complaints were received by the GLAA, three were responded to within 15 working days, the other required further information from the complainant.

Please note, data on complaints was not provided before February 2019

PROTECT

Strategic Priority: Protecting Vulnerable People

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

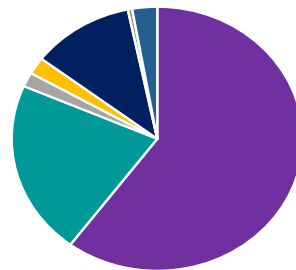
Intelligence

General Issues

There has been an increase in the number of General Issues (GI's)/referrals processed this reporting period when compared to the previous year. General Issues are the first point of recording for matters reported to the Intelligence team by whatever means.

	2018-19	% change from 2017/18
Created	2740	↑ 50%

60% of General Issues resulted in no further GLAA action/ intelligence only – however it should be noted that this is after the initial assessment. 21% resulted in an investigation or linked to an existing case.




- Intel Only/ NFA
- General Advice
- Refer to partner agency
- Ongoing
- Progressed to / linked to existing investigation
- Informal Resolution
- Other/ Unknown

This is consistent with referrals made in 2017/18 in which 58% resulted in no further action/ intelligence only and 20% resulted in an investigation or linked to an existing case.

Intelligence Reports

The GLAA is an intelligence-led organisation and continues to receive a consistent stream of intelligence regarding potential worker exploitation at all levels. There has been an increase in the number of intelligence reports processed during 2018/19 when compared to the previous year.

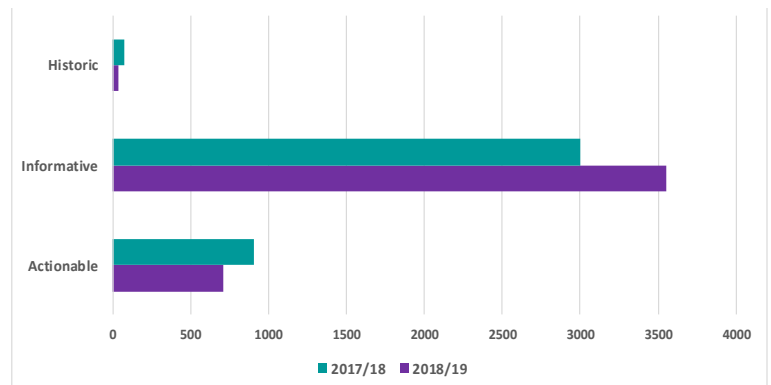
	2018-19	% change from 2017-18
Intelligence Reports created	4298	 8%

GLAA Sector?	2018-19		2017-18	
	Yes	No	Yes	No
	1336	2962	1185	2734 <i>68 Unknown</i>
Modern Slavery Indicators	Yes	No	Yes	No
	303	3995	383	3604

Consistent with quarterly performance reports produced earlier in the year, the larger proportion of intelligence received concerns sectors not regulated by the GLAA in terms of licensing. 93% of reports no modern slavery indicators are identified on initial receipt.



Actionable Intelligence

The amount of actionable intelligence received during 2018/19 has decreased when compared to the previous year while informative intelligence has increased. Intelligence may not be deemed actionable until it is developed further, but it is recommended that further analysis is conducted to fully understand the reasons for this change.



Where the source of actionable intelligence is known, the majority comes from partner agencies. Where sector is known the highest number of actionable reports concern the agricultural, car wash and food processing sectors

-Identification and support of victims


	2018/19	% change from 2017/18
Potential victims of labour exploitation identified from Enforcement activity	1658	 330%
Number of MS1 forms submitted by the GLAA	34	 19%

There has been a significant increase in the number of potential victims of labour exploitation identified by the GLAA, a result of increased operational activity, raised awareness and potentially increasing levels of exploitation.

There continues to be some disparity between the number of potential victims identified and the amount of NRM and MS1 referrals, however it is important to note that exploitation can take many forms and may not always indicate modern slavery.

The number of MS1 forms submitted by the GLAA has decreased this reporting period, however, as noted in the last performance report, there were a number of referrals made during Q3 2017/18 which pertain to the same investigation.

The number of NRM referrals has increased between January and December 2018 when compared to the same period in 2017¹.

	2018	% change from 2017
Number of NRM referrals made by the GLAA	33	 50%

The GLAA also assist various partner agencies in the referral of victims into the NRM.

Tier 1 intervention

Approximately 53 workers have been assisted by way of a Tier 1 intervention and over £3,000 has been recovered on their behalf; non-monetary recoveries have also been made, for example P45's.

Tier 1 interventions were paused earlier in the year due to resource constraints but have since resumed.

¹ NCA End of Year Summary for 2018. Please note stats for January to March 2019 have not been published by the NCA at the time of writing this report and due to problems following the IT transition, may not be accurate on GLAA recording systems at present and therefore have not been included at this time.

PURSUE

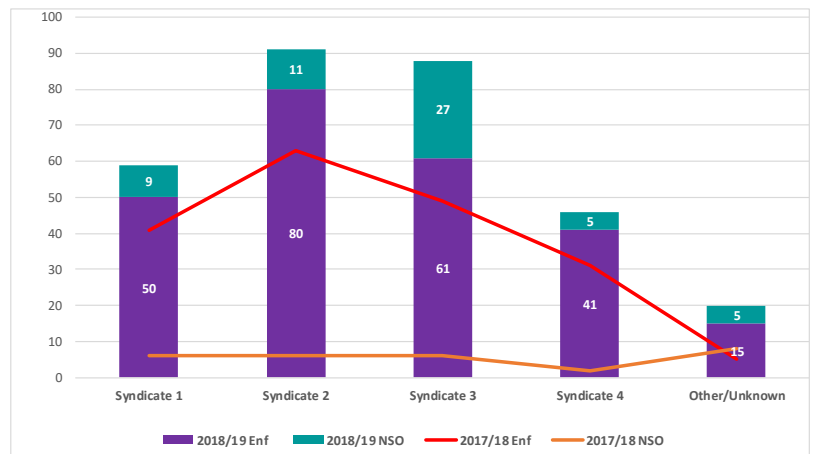
Strategic Priority: Pursuing those who exploit others for their work either financially, physically and or through coercion and control

- *Disrupt criminal activity within the labour market*

Enforcement

	2018-19	% change from 2017-18
Enforcement cases tasked	247	↑ 31%
Non-standard operations (NSO)	57	↑ 104%

The number of enforcement investigations has increased by 31%, around half of these had indicators of modern slavery and just over half related to sectors not regulated by the GLAA in terms of licensing.



Arrests and Warrants

There have been 48 arrests made over the reporting period.

The majority of arrests were in relation to offences of modern slavery and human trafficking (MSHT) which may explain why fewer arrests were made in the Syndicate 4 area, covering Scotland and Northern Ireland where the GLAA currently has no remit to investigate MSHT.

The GLAA has obtained 38 warrants.

A total of 15 LMEU's have been issued over the reporting period, with the majority in the Syndicate 3 area, accounting for 67%. The first two LMEO's were agreed in October 2018.

A total of 31 warnings have been issued.

17 Enforcement Notices have been issued.

	2018-19					
	Syndicate 1	Syndicate 2	Syndicate 3	Syndicate 4	Compliance	Total
Offences charged	0	2	0	0	0	2
Warnings	11	5	1	3	11	31
Enforcement Notice	10	1	6	0	0	17
LMEU	2	1	10	2	0	15
LMEO	2	0	0	0	0	2

At the time of writing this report 10 cases were with the CPS awaiting a decision.

Closed Investigations

Of those investigations closed this reporting period 37% resulted in no offences disclosed and 30% were referred to another agency (non-GLAA offences). These are the most commonly recorded disposal codes during 2018/19.