GLAA Performance Report

April- September 2018- External

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Gangmasters & Labour Abuse Authority

Business Plan Objectives

Aim	Measure	April to September 2018	
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 129 active enforcement operations.
		Closed	49
To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations	Sanctionable outcomes by type	**Convictions**	2
		Warnings	15
		LMEO	0
		LMEU	3
		Enforcement notice	4
To make use of financial investigation powers in investigations	Number of times POCA used in operations	**0**	
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.** **38 organisations currently signed up.** **Textile Protocol to be signed off 3ʳᵈ October**	
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**		
To work to increase the number of enforcement investigations undertaken in partnership, whether GLAA or partner led	**Number of active joint working cases**	**54**	
To address the time, it is taking to process a licence application, ensuring this is kept to the standard	**% completed within 30 days**		
To review the time taken to complete a compliance investigation,	**% completed within 30 days**	**0%**	

allowing us to target persistent non-compliance in the regulated sector			
To work towards prioritising victims as part of our investigations	**Victims identified by type and referrals**	Potential victims identified	**691**
		NRM	**26**
		MS1	**30**
To be compliant with the Victims Charter requirements			
To raise awareness of the signs of modern slavery by providing external training			

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, Support compliant business
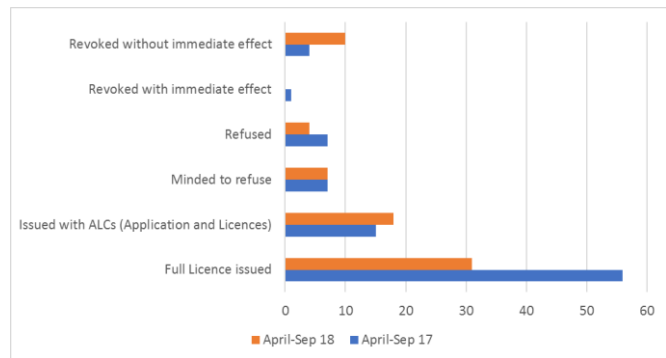
Licensing

Currently there are 998 GLAA licence holders supplying workers to the GLAA regulated sector. There continues to be a consistent stream of licence applications with 16 initiated in September 2018.

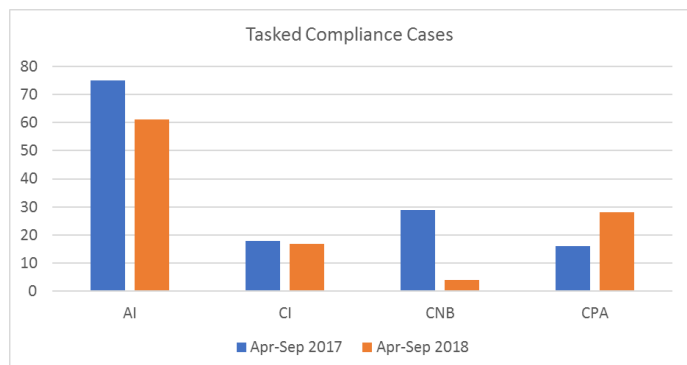| Licence Applications Initiated	April-September 2018	April-September 2017
	74	80

There is a slight decrease in the number of licence applications initiated during the first two quarters of 2018, however numbers remain relatively consistent and in most cases a licence was granted.

There was a slight increase in the number of licences revoked without immediate effect and no licences revoked with immediate effect during the first two quarters of 2018

Compliance

110 compliance cases were tasked this reporting period, a decrease of 20% when compared to the previous year. The number of tasked application and compliance inspections have remained steady and it would appear a decline in the number of CNB inspections may be the reason for the decrease. These are often conducted on a case by case basis dependent on risk, for example adverse intelligence, and not necessarily routine, so as not to burden businesses.
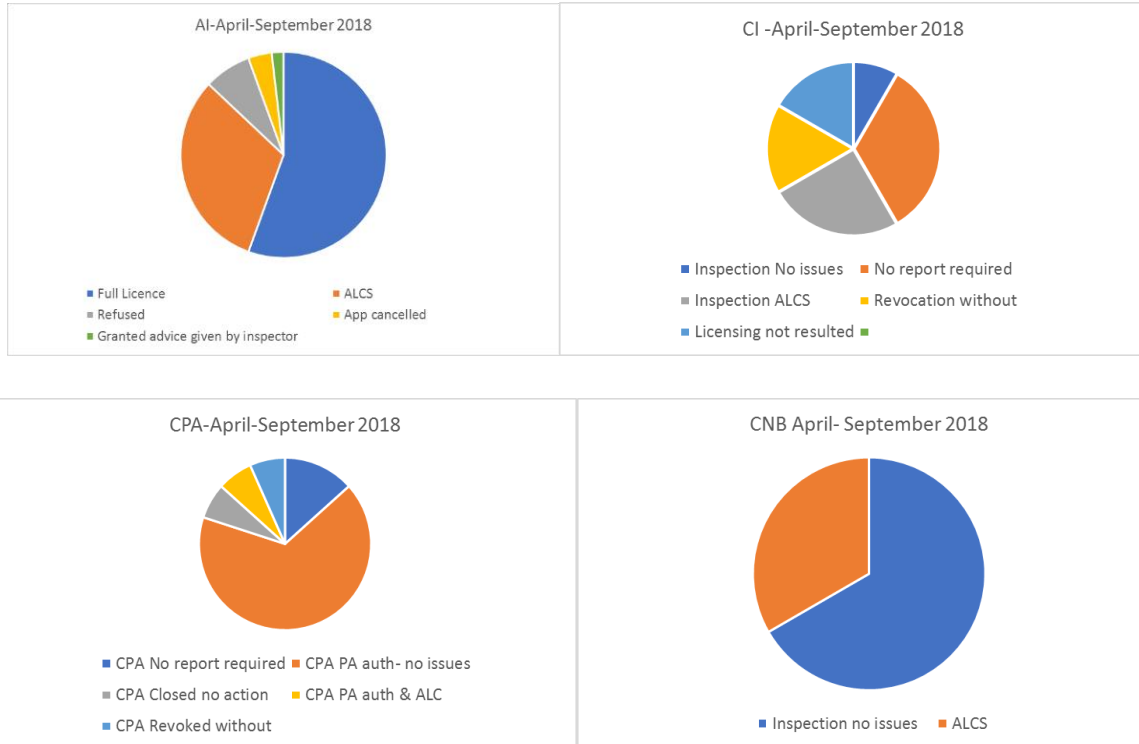

Tasked Compliance Cases

Working in partnership to protect vulnerable and exploited workers

![Gangmasters & Labour Abuse Authority logo]

65% of compliance cases were closed within 3 months during this reporting period.
There are currently 84 open compliance investigations, of which 39% are AI's and may include licence applications that have been suspended.

Closed cases by type

The outcome of closed cases during this period suggests general compliance of licensed labour providers.

There were four licence refusals and three licences revoked without immediate effect following inspection activity. These have been due to critical breaches of the licensing standards.

Where appropriate, and where non-compliance has not been critical, ALCS have been issued. This allows businesses to progress in a compliant manner without additional sanctions in the first instance.
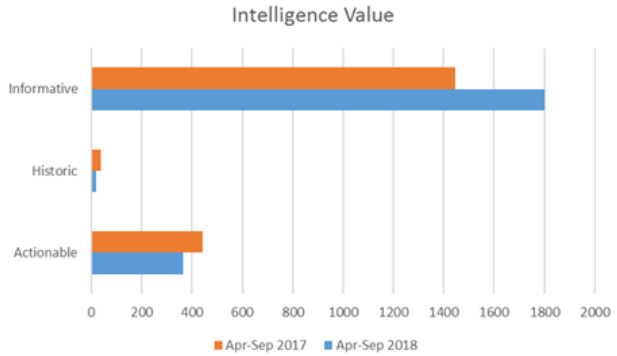
PROTECT

Strategic Priority: Protecting Vulnerable People

Identify & support victims of labour exploitation; Work in partnership to protect workers' rights and prevent labour exploitation
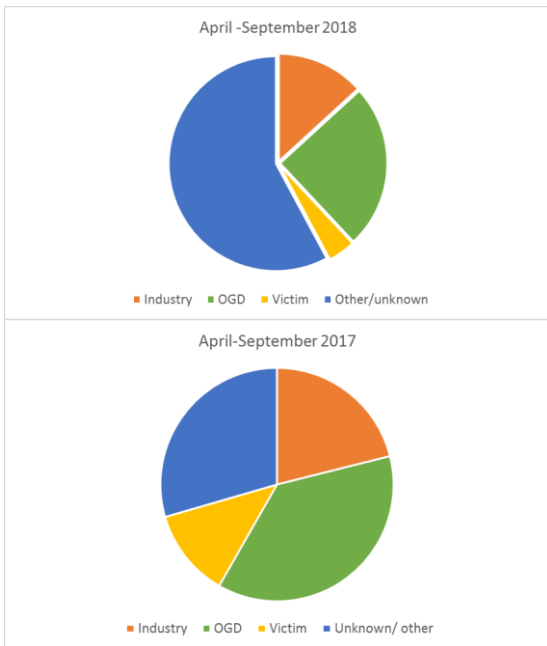
Intelligence

	Apr-Sept 2018		Apr-Sept 2017	
Intelligence Reports Created	2182		1926	
GLAA Sector?	**Yes**	**No**	**Yes**	**No**
	647	1535	604	1254
Modern Slavery Indicators?	**Yes**	**No**	**Yes**	**No**
	152	2030	222	1704

Intelligence Value

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 amount of Intelligence processed this reporting period, when compared to the same period last year.

The majority of intelligence concerns sectors not regulated by the GLAA in terms of licensing, and often no modern slavery indicators are identified initially.

82% of intelligence reports processed between April and September 2018 were deemed informative.

Actionable Intelligence

April -September 2018

April-September 2017

Between April and September 2018 17% of intelligence reports were classed as actionable at the time of processing the report.

Where the source is known/ recorded the majority of actionable intelligence was received from partner agencies and industry sources.

Just 4% of intelligence derived from potential victims of labour exploitation was deemed to be actionable on initial review. This is comparable to the same period in 2017. There could be many reasons for this, for example intelligence not considered actionable on receipt may change once the information is developed. In the main, actionable intelligence concerns the agricultural and food processing sectors, both are regulated by the GLAA in terms of licensing.

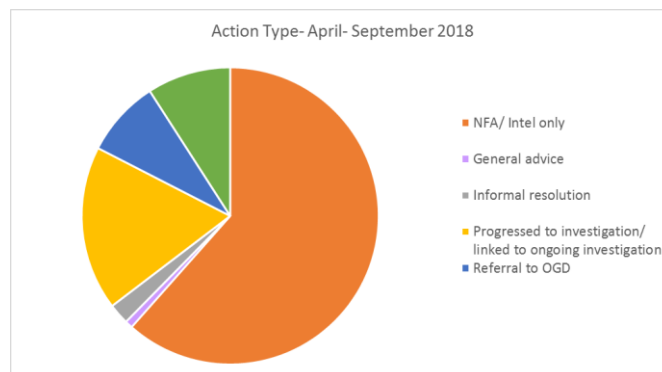| Sector	% Actionable Intelligence Apr-Sept 2018	% Actionable Intelligence Apr-Sep 2017
Agriculture	17%	14%
Food Processing	13%	7%
Car Wash	11%	
Hotels & Restaurants		7%

Actionable Intelligence tends to relate to the agricultural and food processing sectors.

Between April and September 2018 11% of actionable intelligence related to car washes which may foretell an improvement in the quality of information received in this sector, which has generally been vague.

General Issues

The number of General Issues created during April and September 2018 increased when compared to the previous year. The majority were closed with no further action or for intelligence purposes only.
18% progressed to an investigation or were linked to an existing investigation.
The most common type of approach tends to be from an intelligence source. This is true for both cases closed with no further action and those progressed to an investigation.

	April- September 2018	April-September 2017
Created	1336	561

Action Type- April- September 2018

- NFA/ Intel only
- General advice
- Informal resolution
- Progressed to investigation/ linked to ongoing investigation
- Referral to OGD

Identification and support of victims

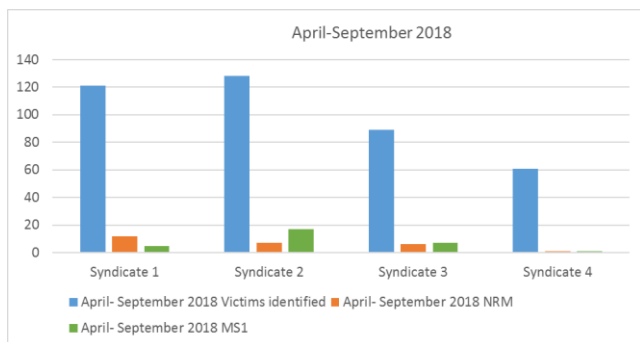|	April- September 2018	April- September 2017
Potential victims of labour exploitation identified **GLAA lead agency**	399	53
Potential victims of labour exploitation identified **GLAA not lead agency**	292	23
Number of NRM Referrals made by the GLAA	26	4
Number of MS1 forms submitted by the GLAA	30	9

There has been a notable increase in the identification and support of victims between 2017 and 2018. This may be a result of increased resources, raised awareness, increasing levels of labour exploitation or a combination of all.

Identification of victims appears to be consistent across the syndicate areas, with the greatest amount in the north-east and south-east.

Where the GLAA were the lead agency, over half of the potential victims encountered were working in the food processing or food packaging sector, however it is important to note that a number pertain to the same investigation.

The majority of potential victims encountered where of Romanian nationality.

There are less NRM referrals and MS1 notifications in the north-west area and slightly less potential victims identified. It is important to note the area covers Northern Ireland and Scotland neither of which are currently covered by the wider GLAA remit for modern slavery and labour market offences.

Tier 1 intervention
Between April and September 2018 over 20 workers were assisted by the GLAA with regards to allegations of labour exploitation that were deemed to be low risk and dealt by way of a tier 1 intervention. Over £3000 has been recovered for workers using this method, non-monetary recoveries have also been made.
A further £83,421.23 has been recovered for workers as a result of compliance activity carried out by the GLAA.
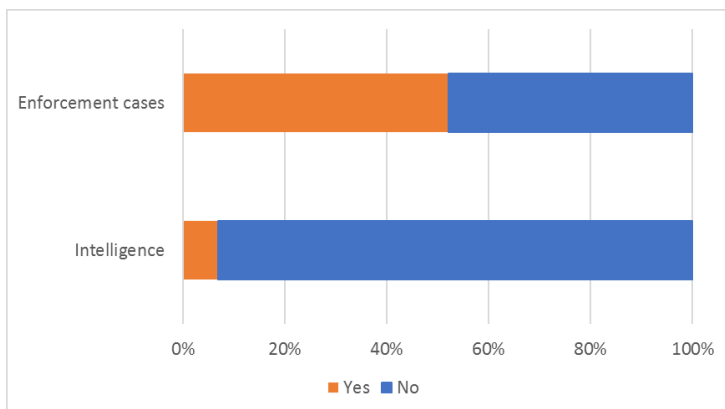
PURSUE

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

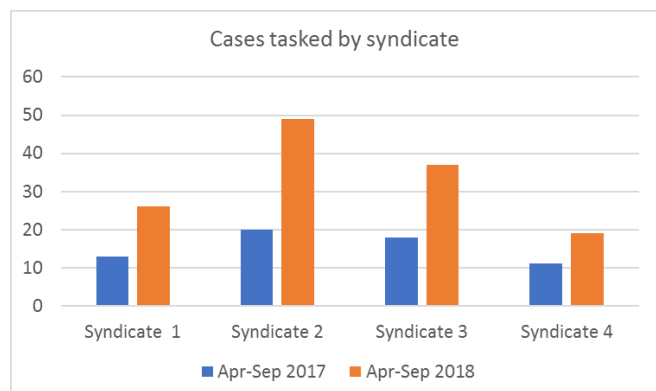|	April- September 2018	April- September 2017
Enforcement cases tasked	131	62
Non-Standard operations (NSO)	28	16

The number of tasked enforcement cases increased by 47% during this reporting period when compared to the same period last year.
Between April and September 2018 47% of tasked cases had indicators of modern slavery/ human trafficking. In 93% of intelligence reports no modern slavery indicators were initially found, this would suggest that those indicators may not become apparent until an investigation commences.

53% of tasked cases concern sectors that are regulated by the GLAA in terms of licensing.

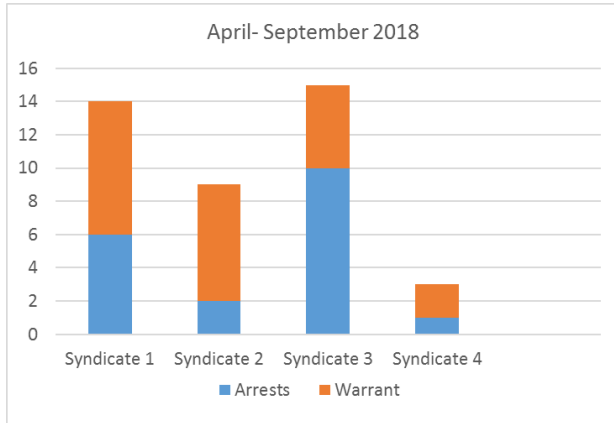Almost half of tasked enforcement cases had the opportunity for joint working.

The number of NSO's (where we assist the police in a day of action for example) increased between April and September 2018 when compared to the previous year. 82% involved joint work with partner agencies. Of those closed, 75% were no further action or for intelligence purposes only.

Arrests & Warrants

April- September 2018

There have been 19 arrests over the last six months.

The GLAA have obtained 22 warrants.

18 cases are currently with the CPS.

There was one offence charged for S12 offences by Syndicate 2.

Two convictions were received for unlicensed trading this reporting period in Northern Ireland, covered by Syndicate 4.

Apr-Sept 2018	Syndicate 1	Syndicate 2	Syndicate 3	Syndicate 4	Compliance	Total
Offences charged	0	1	0	0		1
Warnings	4	2	1	2	6	15
Enforcement Notice	3	1	0	0		4
LMEU	1	0	2	0		3

Glossary of Terms

GLAA	Gangmasters & Labour Abuse Authority
POCA	Proceeds of Crime Act
NRM	National Referral Mechanism
MS1	Duty to Notify the Home Office when a potential victim of modern slavery is identified & does not consent to the NRM.
AI	Application Inspection
CI	Compliance Inspection
CPA	Change of PA Inspection
CNB	Compliance- New Business Inspection
ALC	Additional Licensing Conditions
NSO	Non-standard operation
MSHT	Modern Slavery/ Human Trafficking
General Issue	Record of referrals to the GLAA
RIPA	Regulation of Investigatory Powers Act 2000
OCG	Organised Crime Group
CARD	Crimson Allocation Record Sheet
Crimson	Case Management System
Syndicate 1	North-east
Syndicate 2	South-east
Syndicate 3	South-west
Syndicate 4	North-west