



Gangmasters  
Licensing Authority

# GLA Corporate Plan

1 April 2006 to 31 March 2009







# I. Chairman's foreword

This is the first Gangmasters Licensing Authority (GLA) Corporate Plan covering a 3-year period, the first year of the Authority's existence having been laid out in an interim business plan agreed by the GLA Board in May 2005.

This plan sets out the vision for the authority, the underpinning objectives, and the indicators and targets that will deliver the objectives in a measurable way.

The first year of the GLA was given to setting up the Authority, to open for business on 6th April 2006. A great deal was achieved in a short time during the first year, and I want briefly to pay tribute to the GLA Board, to Defra officials, and to all staff of the GLA for this remarkable achievement. However, that is now history, as the GLA starts in earnest to take on the challenge for which it was formed – to reduce the exploitation of workers in agriculture, horticulture and shellfish gathering.

The next 3 years have three main goals – getting the GLA fully operational, becoming more effective and efficient, and preparing to move to the HSE in accordance with a recommendation of the Hampton Report. The processes, the organisational framework and the staffing levels

that the Authority have put in place to meet these goals have been carefully designed and widely consulted. But this is the first attempt to regulate gangmasters in this way, and the plans have been based necessarily on a wide range of management assumptions. I am satisfied that these assumptions are as reasonable as the planning uncertainties allow, and that the plan is ambitious but realistic. I commend it.



A handwritten signature in black ink, which appears to read 'Paul Whitehouse'. The signature is written in a cursive, flowing style.

**Paul Whitehouse**  
Chairman



## 2. Background

The work of the GLA will contribute to the strategy of various government departments by helping to maintain a sustainable food and farming supply chain, as well as sustainable rural communities by promoting social inclusion and reducing deprivation.

The Government's objectives for introducing licensing:

- **curb the exploitative and other illegal activities of labour providers**
- **increase Exchequer revenues by promoting employment of legitimate workers**
- **promote fair competition amongst labour providers**
- **identify and take action against labour providers operating without a licence.**

Following the tragedy at Morecambe Bay, impetus was given to the introduction of the Gangmasters (Licensing) Act 2004. Strong support was

received from industry and key stakeholders for the Act which established the Authority and the requirement for gangmasters to be licensed. Prior to the Act becoming law, a group comprising major retailers, growers, suppliers, labour providers and trade unions, set up the Temporary Labour Working Group (TLWG). The TLWG was convened by the Ethical Trading Initiative (ETI), with co-operation from government. Its aim was to establish a set of minimum standards for labour providers (the code of practice) which could be enforced by new statutory controls. Audits have been conducted against the code providing evidence of compliance.



# 3. The scope of licensing

The GLA is required to establish a UK wide licensing scheme and create a register for gangmasters operating in agriculture, horticulture and shellfish gathering and associated processing and packaging industries.

The statutory functions and powers of the Authority are set out in sections 1 and 8 of the Act and are also prescribed in regulations. The duties of the Authority relate to:

- the consideration of applications
- the issue of licences to Gangmasters and
- taking compliance action when licence conditions have been breached.

All labour providers who supply workers to agriculture, horticulture and the related food processing and packaging industries will require a licence. The exclusions to this are set out in the Gangmasters (Exclusions) Regulations 2006 and cover activities such as machinery rings and farmer to farmer loans. Those employment agencies which supply workers within this sector to a labour user for a permanent position will also require a licence.

The Authority will not be introducing licensing for those conducting gangmastering activity in the shellfish gathering industry until October 2006. This will allow for further time to be spent on developing a greater understanding of the shellfish industry, as it is intrinsically different from that of agriculture and food processing and packaging. The main difference is that a gangmaster in this context is someone who uses labour to undertake the gathering of shellfish rather than supplies it.



## Criminal offences and enforcement

A range of criminal offences are provided for in the Act. These are designed to deal with unlicensed activity in relation to gangmastering. It is likely that these will be commenced once the licensing scheme has been up and running for six months (Autumn 2006). Defra has appointed officers of the Authority to enforce the criminal sanctions in the Act. This will be the subject of a separate Service Level Agreement.

## 4. Status of the authority

The Authority is classified as an executive Non-Departmental Public Body and does not carry out its functions on behalf of the Crown. Its sponsor Department is the Department for Environment, Food and Rural Affairs (Defra). As agriculture and

employment matters are devolved matters for Northern Ireland, the 2004 Act requires specific arrangements to be undertaken by the Department of Agriculture and Rural Development in Northern Ireland.

## 5. Mission statement

The mission of the Gangmasters Licensing Authority is to safeguard the welfare and interests of workers as defined by the Act, whilst ensuring labour providers operate within the law.

The mission will be achieved by:

- Introducing and operating a system to license labour providers, including a publicly accessible register;
- Effective communication of the legal requirement for labour providers to become licensed, and to operate and remain within the formal economy;
- Imposing the least possible burden on labour providers and labour users through efficient and effective processes and procedures;
- Developing and promoting standards for best practice in the supply and use of temporary labour, in collaboration with stakeholders;
- Checking licence holders for continued compliance with the licence conditions;
- Taking enforcement action against those who operate illegally or who for other reasons are judged unfit to hold a licence;
- Supporting enforcement of the law, by or in conjunction with the enforcement authorities of other government departments, and others as appropriate, through shared information and joint working;
- Maintaining a continuous review of the activities of gangmasters and the effects of the Act and the Authority on them.

## 6. What we have done up to 1 April 2006

The GLA began work on 1 April 2005. Most of its first year has been spent preparing for licensing. This involved:

- Recruitment of staff
- Establishing the office
- Working with key stakeholders to gain an understanding of the industry
- Identifying strategies for the delivery of licensing
- Developing the relevant systems and procedures
- Procurement and development of the licensing system and other supporting information systems.

## 7. The regulations

Defra has the lead on the regulations arising from the Act, except in relation to setting the rules for the licensing scheme (section 8). The GLA has determined the licensing conditions and licence fees which were the subject of public consultation before becoming law in April 2006. Defra has been responsible for:

- The Gangmasters (Licensing Authority) Regulations 2005
  - The Gangmasters (Exclusions) Regulations 2006 which set the scope of the Act and
  - The Gangmasters (Appeals) Regulations 2006
  - The Gangmasters (Reasonable Steps) Regulations 2006.
- The 2004 Act requires the Department of Agriculture and Rural development in Northern Ireland to make separate legislation in respect of Appeals, Exclusions and Reasonable Steps.



## 8. Timetable for introducing licensing

Date	Action	Outcome
6 April 2006	Licensing begins for agriculture and food processing and packaging	Applicants can apply for a licence
1 May 2006	Public register goes live	Anyone can check whether a gangmaster is licensed
1 October 2006	Commencement of the offence of being an unlicensed gangmaster for agriculture and food processing and packaging	Unlicensed gangmasters liable for prosecution
	Licensing begins for shellfish gathering	Applicants can apply for a licence
1 December 2006	Commencement of the offence of using an unlicensed gangmaster for agriculture and food processing and packaging	Labour users can be prosecuted for using an unlicensed gangmaster. They are required to take reasonable steps to establish whether a gangmaster is licensed.
6 April 2007	Commencement of offences for shellfish gathering for gangmasters and users	Mirrors offences for agriculture





## 9. The Board of the authority

Board members have been nominated from organisations across the associated sectors, both industry and Government bodies, to represent the full range of views. Their responsibility is to ensure the GLA fulfils its role and complies with the Gangmasters (Licensing Authority) Regulations 2005. The Board is chaired by Paul Whitehouse. There are 19 representative members and 9 ex officio members. A list of the organisations represented on the board is shown at appendix I. The Ethical Trading Initiative is permitted to send a representative to any meeting of the Board as an observer. Observers can contribute to the discussion at the invitation of the chair.

The Chairman is responsible to the Secretary of State for ensuring that the Board's policies and activities support the wider strategic policies of Defra and for taking reasonable steps to ensure that the Authority's affairs are conducted with probity.

The Chairman shares with other Board members the corporate responsibilities set out below, and in particular for ensuring that the Authority fulfils Defra's wider aims and objectives. The Board has a corporate responsibility for ensuring that the Authority fulfils the aims and objectives set by the Secretary of State and for promoting the efficient and effective use of staff and other resources by the Authority.

## 10. Managing our business

The Chief Executive is responsible for the Authority's performance against key targets and to the Principal Accounting Officer on matters relating to the management, regularity and propriety of the GLA and its financial performance. The Board will formally support the Chief Executive in taking strategic decisions on business objectives, plans and priorities, risks and resource allocations. The Executive Management Board comprising the senior

members of the GLA is responsible for day to day management and operational decisions. The Audit and Risk committee will provide the Chief Executive with advice on the strategic processes for risk, control and governance and the statement on internal control.

The GLA Executive members are listed at appendix 3.

## 11. Challenges for the authority

The Chancellor announced in 2005 that as a result of the Hampton review the newly formed GLA would be merged with the Health and Safety Executive (HSE) by 2009. This is part of a programme of reform of the vast array of regulators currently in existence. A programme

board has been set up to oversee the arrangements for the merger. The Cabinet Office is leading on ensuring that the necessary legislative changes have been made to facilitate the move.

# 12. Achieving and managing our objectives

The Authority contributes to the achievement of the aims, objectives, targets and Public Service Agreements of Defra and, as appropriate, those of other Government Departments, as well as to wider Government initiatives such as those which seek to improve the efficiency, economy and effectiveness of public services.

The GLA will achieve its mission by meeting the organisational objectives set out below. The GLA's objectives are set out in priority order.

Objective 1	Achieving high level milestones
This objective focuses on the GLA reaching full operating capability and meeting the requirements for Licensing, Compliance and Enforcement.	
Person responsible	Director of Operations

Objective 2	Outcomes
This objective will drive the GLA to become more effective in meeting the aims of the Act. The GLA will establish agreed indicators and targets and measure performance against these to show improving effectiveness.	
Person responsible	Chief Executive

Objective 3	Communications
Communications sits at the heart of the success of the GLA. Those covered by the licensing scheme and stakeholders need to have a clear understanding of the requirements of licensing.	
Person responsible	Director of Policy and Communications

Objective 4	Financial performance
This objective concerns the financial performance of the GLA and ensuring that it makes the best use of its resources and strives for efficiency. Performance of sustainable operations is also a key area for improvement. We will work with Defra to meet targets for sustainable operations, in particular, energy and water, but also in waste, estate management and procurement.	
Person Responsible	Deputy Chief Executive and Director of Finance

<b>Objective 5</b>	<b>People</b>
The GLA will use the Investors in People methodology to ensure that its staff are well managed. It will focus on recruitment, development and strategies for rewarding staff. Staff will be recruited and employed in accordance with the principles of diversity and equality. IIP accreditation will be sought.	
<b>Person Responsible</b>	<b>Deputy Chief Executive and Director of Finance</b>

<b>Objective 6</b>	<b>GLA performance</b>
This objective is aimed at improving the quality, timeliness and efficiency of licensing, compliance, enforcement and operational support processes.	
<b>Person Responsible</b>	<b>Director of Operations</b>

<b>Objective 7</b>	<b>Hampton implementation</b>
The Hampton review recommended, as part of a series of mergers of small regulators, that the GLA should move from the sponsorship of Defra to the Health and Safety Executive by March 2009.	
<b>Person Responsible</b>	<b>Deputy Chief Executive and Director of Finance</b>





## Targets and measures

The next section describes in detail the activities we will undertake in pursuit of each of these objectives. It sets out the targets and qualitative and quantitative measures that we will use to measure performance.

### Objective 1 – Achieving high level milestones

This objective sets the framework for the successful introduction of licensing. The key risk is that the GLA does not meet the high

level milestones and so licensing is not introduced successfully.

Target 1.1 Application	<b>Milestone 1 – 6 April 2006.</b> When the first licence application is received.
	<b>Milestone 2 – 28 April 2006.</b> When the first GLA licence is issued.
	<b>Milestone 9 – 31 July 2006.</b> When the first GLA licence appeal is completed.
	<b>Milestone 12 – 18 April 2007.</b> When the first licence renewal fee is paid.
Target 1.2 Inspection	<b>Milestone 5 – 23 April 2006.</b> When the first GLA application inspection is completed.
Target 1.3 Checking	<b>Milestone 3 – 1 May 2006.</b> When the GLA public register is operational.
	<b>Milestone 7 – 15 November 2006.</b> When the first active check is made.
Target 1.4 Enforcement & Compliance	<b>Milestone 10 – 1 August 2006.</b> When compliance operations start.
	<b>Milestone 11 – 1 May 2007.</b> When the first successful prosecution under the act is made.
Target 1.5 Communications	<b>Milestone 8 – 1 November 2006.</b> When all communications to support the commencement of the offence of using an unlicensed gangmaster are complete.
Target 1.6 Policy	<b>Milestone 4 – 3 April 2006.</b> When all policy to support operations is in place.
Target 1.7 IT	<b>Milestone 6 – 15 August 2006.</b> When all IT to support operations is in place.
Narrative	The GLA high level targets are contained in the GLA high level milestone plan agreed by the GLA board. They are the essential components of the GLA implementation plan.

## Objective 2 – Outcomes

This objective sets out how the GLA will become more effective in meeting the aims of the Act. The GLA will establish agreed indicators and targets and measure performance against these to show improving effectiveness.

The main risk associated with this objective is that the GLA cannot demonstrate how it has met its statutory duty to measure the impact of licensing.

Target 2.1	Measuring outcomes
Quantity	To be determined through research. Measuring Outcomes (MO) project to be initiated by 1 Aug 06.
Quality	To be determined.
Narrative	<p>The GLA starts with no baseline against which to measure its effectiveness, and no targets or indicators. It recognises that there are three main groups of beneficiaries that it should seek to satisfy as follows:</p> <ul style="list-style-type: none"> <li>■ <b>Workers. Reduce exploitation:</b></li> <li>■ <b>Industry. Reduce the regulatory burden:</b></li> <li>■ <b>The Tax Payer. Reduce fraud on the revenue.</b></li> </ul> <p>The GLA also recognises that to be effective, it has to achieve the right balance between these objectives – they cannot be considered in isolation.</p> <p>It is a specialist task to develop a baseline, targets and indicators to measure outcomes in an holistic, rigorous way, and it will take some time to collect sufficient data to allow sound analysis and the drawing of safe conclusions. Therefore, in the first year the GLA will concentrate on establishing the approach and the baseline, with the first meaningful measure of outcomes not anticipated before Year 2.</p>



### Objective 3 – Communications

Effective communications and marketing so that labour providers, labour users and key stakeholders are aware of the licensing scheme and how it affects them.

This objective covers the different aspects of communications and marketing activities and sets out how stakeholders will be informed of licensing.

The key risk is that those who require a licence and labour users may not be aware of the requirements of licensing if the GLA does not have a successful communications campaign.

Target 3.1	Awareness of licensing – agriculture and horticulture and food processing and packaging
Quantity	90% of identified gangmasters should be aware of the legal obligations for licensing by 6 April 2006 (go live date).
Quality	By 6 April 2006 the database of labour providers should hold information on 900 licensable gangmasters.
Narrative	All those covered by the scope of the act need to be aware of the licensing scheme and whether it applies to them.

Target 3.2	Awareness of the offence of acting as an unlicensed gangmaster – agriculture and horticulture and food processing and packaging
Quantity	90% of identified labour providers and users should be aware of the legal obligations for licensing by 1 October 2006.
Quality	By 1 October 2006 information should be available in a variety of formats for workers, labour users and providers to access. Helpdesk staff will survey all callers.
Narrative	Labour providers and labour users need to be aware that if a labour provider remains unlicensed beyond 1 October 2006 they will be committing an offence and liable to prosecution.

Target 3.3	Application submission strategy
Quantity	75% of applications for a gangmasters licence should be made online.
Quality	Applicants chose the web as their preferred option due to ease of use; speed and accessibility as evidenced through feedback. The GLA will conduct an esurvey to judge effectiveness of the application process.
Narrative	The GLA is aiming to provide a fully electronic service so that applicants have the freedom to choose when to apply and follow-up enquiries are unnecessary.

Target 3.4	Awareness of the offence of using an unlicensed gangmaster – agriculture and horticulture and food processing and packaging
Quantity	90% of identified labour users should be aware of the legal obligations for licensing by 1 December 2006.
Quality	By 1 December 2006 information should be available in a variety of formats for labour users. Helpdesk staff will survey all callers.
Narrative	Labour users need to be aware that if they use an unlicensed labour provider beyond 1 December 2006 they will be committing an offence and liable to prosecution.



<b>Target 3.5</b>	<b>Awareness of licensing – shellfish</b>
Quantity	90% of identified gangmasters should be aware of the legal obligations for licensing by 1 October 2006 (go live date).
Quality	By 1 October 2006 the database of gangmasters in shellfish should hold information on 90% of licensable gangmasters.
Narrative	All those covered by the scope of the act need to be aware of the licensing scheme and whether it applies to them.

<b>Target 3.6</b>	<b>Awareness of offence of acting as an unlicensed gangmaster – shellfish</b>
Quantity	90% of identified labour providers and users should be aware of the legal obligations for licensing by 6 April 2007.
Quality	By 6 April 2007 information should be available in a variety of formats for workers, labour users and providers to access. Helpdesk staff will survey all callers.
Narrative	Labour providers and labour users need to be aware that if an LP remains unlicensed beyond 6 April 2007 they will be committing an offence and liable to prosecution.

#### Objective 4 – Financial performance

To ensure that the GLA operates in the most effective and efficient manner. That is to say that the overhead burden suffered by the organisation is kept to an absolute minimum at all times.

Following the conclusion of the Public Consultation it is intended that the GLA will

operate on a full cost recovery basis. That is to say that the annual operating costs of the Authority will be covered in full by license fees received. Therefore, the major risk that the GLA will face is that it may not issue enough licences to ensure full cost recovery.

<b>Target 4.1</b>	<b>The GLA will continue to operate on an effective and efficient basis to ensure that no undue financial burden is imposed on licence fee payers.</b>
Quantity	The licence fee is kept to the lowest possible economic level.
Quality	Licence fees are not seen as a barrier to entry by the marketplace.
Narrative	The GLA operates on a full cost recovery basis.

<b>Target 4.2</b>	<b>The GLA will undertake a formal review of its organisation structure during 2006/7 to ensure that licence fee payers are receiving value for money from the authority.</b>
Quantity	Review will be completed with a minimum disruption to the day to day activities of the authority.
Quality	The GLA has the right number of directorates with the right number of people within the directorates, to ensure that there is an appropriate balance between resources and responsibilities.
Narrative	It is intended that review of organisation structure within the GLA will take place during 2006/07.

<b>Target 4.3</b>	<b>The GLA will continue to strive to reduce the unit cost of issued licences.</b>
Quantity	The GLA will produce a strategic plan that seeks to reduce the operating costs of the Authority (excluding pay inflation) by at least 2% per annum.
Quality	Any reduction will have minimal or no effect on the GLA's key objectives.
Narrative	In order to keep unit costs to the optimum level, the GLA will aim to issue more licences for the same costs or the same number of licences for a reduced cost.

<b>Target 4.4</b>	<b>The GLA will keep under constant review any areas that are perceived to be appropriate to maximise its miscellaneous income from receipts other than licence fees.</b>
Quantity	Any income generation scheme would only be the result of a fully costed and agreed business case to ensure financial propriety.
Quality	Income generation will never be to the detriment of core business.
Narrative	It is expected that over the next three years GLA Directors will investigate a range of business cases for income generation.

<b>Target 4.5</b>	<b>Contributing to meeting the requirements of Defra's sustainability target.</b>
Quantity	To produce a sustainable development plan by 31 December 2006.
Quality	The plan reflects the GLA's contribution to sustainability.
Narrative	As a delivery agent the GLA is required to have a sustainable development plan.

<b>Target 4.6</b>	<b>To promote sustainable development within the work of the GLA, and to improve sustainable development performance in our operations.</b>
Quantity	Ensure that energy and water use are monitored and that measures are introduced to improve efficiency and reduce costs. 100% of GLA premises have paper recycling bins introduced by 1 April 2007.
Quality	New contracts with suppliers are monitored for sustainable development. For example, recycled paper should be purchased, replacing any existing contracts for non-recycled paper for use in printers and photocopiers.
Narrative	All central government departments are covered by the new framework on sustainable development, which is currently being developed and will be introduced in late summer 2006. Some NDPBs will be covered by the targets in this framework (this will be decided by ministers in each department on a case by case basis).

## Objective 5 – People

This objective covers the recruitment, development and treatment of staff. If the GLA fails to recruit and retain appropriate staff then

there is a risk that the GLA will not meet the requirements of the Act.

<b>Target 5.1</b>	<b>To ensure that the GLA is staffed appropriately to meet its business objectives</b>
Quantity	The GLA staffing levels are as agreed in the HR strategy.
Quality	The GLA will strive to have the right people with the right skills in the right jobs in the right places.
Narrative	The GLA will carry out its recruitment in line with its HR strategy and ensure that it has appropriate staffing levels.

<b>Target 5.2</b>	<p><b>The GLA will seek to be a proactive organisation in relation to its HR policies and operations to enable its most important resource (people) to be:</b></p> <ul style="list-style-type: none"> <li>■ Effectively recruited (on time)</li> <li>■ Properly rewarded</li> <li>■ Trained and developed</li> <li>■ Motivated</li> <li>■ Multi skilled (where appropriate)</li> <li>■ Retained</li> </ul>
Quantity	The level of staff turnover is kept to under 5% p.a.
Quality	Salary packages equate to the upper quartile of similar government positions in the East Midlands.
Narrative	The GLA will ensure that it meets its retention policy by ensuring that staff view the GLA as a good employer.

<b>Target 5.3</b>	<b>The GLA will continue to communicate effectively with staff at all levels within the organisation.</b>
Quantity	The GLA has put in place monthly staff meetings and regular newsletters from the Chief Executive, plus briefings on particular issues.
Quality	Staff continue to understand the developments within the organisation and feel empowered to make effective contributions to the continuing growth of the GLA.
Narrative	The GLA intends to create a management staff forum to ensure that effective communications are maintained throughout the organisation.

<b>Target 5.4</b>	<b>Best practice in management and staff co-operation</b>
Quantity	Achieve liP status by June 2007.
Quality	Training is targeted and matched to training needs analysis for individual members of staff.
Narrative	The GLA values the input from well-trained staff and sees it as an imperative that all development opportunities are fully exploited thus ensuring a dynamic and informed workforce.



<b>Target 5.5</b>	<b>To recruit and employ staff according to diversity and equal opportunities policy.</b>
Quantity	To be recognised as an equal opportunities employer through a transparent recruitment process and to take account of diversity.
Quality	Training in equal opportunities and diversity to all interviewing staff.
Narrative	In order for the recruitment process to be fair and transparent, some training of staff in equal opportunities will be necessary. All staff will also need to undergo diversity training.

## Objective 6 – GLA Performance

To improve quality, timeliness and efficiency of licensing, compliance, enforcement and operational support.

This covers the key operational areas of:

- Licensing
- Intelligence
- Compliance
- Inspection standards
- Enforcement

The key risk in relation to this objective is that the licensing scheme is not viewed as efficient.

### Licensing

<b>Target 6.1</b>	<b>Licence decisions</b> (time from application to decision)
Quantity	<b>100%</b> of Green light cases to be completed within <b>10</b> working days. <b>80%</b> of applications that require inspection to be completed within 30 working days.
Quality	No more than <b>20%</b> of appeals are upheld in 2006/07.
Narrative	Green light cases refer to those that: <ul style="list-style-type: none"> <li>■ do not require an application inspection</li> <li>■ the other government department checks have returned with no objections to a licence being issued</li> <li>■ the GLA intelligence unit has no reason to prevent the issue of a licence</li> </ul> <p>In these cases the licence decision is to be made no later than 10 working days after finance has confirmed the application fee has been cleared.</p> <p>It is thought that the cases requiring an application inspection will require 20 working days extra. These extra days will be required to schedule and complete an application inspection. Therefore, 30 working days will be the target time to when a licensing decision will be made. However, pressure on resources may have an impact as to whether this goal can be achieved in all cases.</p> <p>The quality of Licensing decisions will be measured on how many appeals are lost. The greater the number lost will indicate that the criteria used for initial decision making needs to be reviewed. Thus if the speed of decision making meets the quantity target set but the number of successful appeals is higher the overall performance will be lower.</p>

Target 6.2	Response to enquiries
Quantity	<p><b>100% of enquiries from Defra or other government departments to be responded to within the prescribed deadline.</b></p> <p><b>90%</b> of Ministerial enquiries to be responded to within <b>2</b> working days.</p> <p><b>75%</b> of public correspondence to be sent a reply within <b>5</b> working days.</p>
Quality	No more than <b>5%</b> of enquiries result in further correspondence.
Narrative	Priority will be given to Ministerial enquires from MPs. Other enquiries including general enquiries and licensing enquires will be responded to with a full reply within 5 working days unless further investigation is required which would take longer than 5 working days, in which case an acknowledgement letter will be sent. Quality will be determined by the clarity of responses, avoiding the need to enter into further correspondence to conclude an issue raised.

## Intelligence

Target 6.3	Effective use of intelligence analysis to support field operations
Quantity	<p><b>95%</b> of Intelligence systems checks will be entered into the GLA licensing system within the 10-day turnaround timeframe (internal equivalent to the other government departments check in licensing).</p> <p>Action will be initiated on intelligence within 5 working days of its receipt.</p>
Quality	<p><b>95%</b> of cases accepted by Enforcement or Compliance teams at the Tasking and Co-ordination meeting, proceed, subject to resource constraints.</p> <p>No more than <b>20%</b> of cases accepted by Enforcement are discontinued due to insufficiencies in the quality of the intelligence.</p>
Narrative	The intelligence team will be treated as another government department in the licensing system for the purposes of interrogating the intelligence management system about applicants. The timeframe for other government departments to respond to licence application checks is 10 days; therefore it should be the same for the intelligence team. Quality target 1 ensures that cases put before the tasking and co-ordination meeting are good quality and not rejected later in the process, other than because of resource constraints. Quality target 2 supports the enforcement team's targets to ensure that the further development of cases to support investigations is of sufficient quality for formal sanctions to proceed.

## Compliance (inc application inspection)

Note: The Application and Compliance Inspection processes are the same. Consequently, the targets are also the same. The actual reporting of the key performance indicators will need, over time, to differentiate between Application and Compliance Inspections.

Target 6.4	Inspection timescales (time from scheduling to inspection report input).
Quantity	<b>80%</b> of application and compliance inspections will be carried out within <b>10</b> days.
Quality	No more than <b>15%</b> of inspection results will be classed as inaccurate against the licensing standards.
Narrative	<p>The 10 day period refers to the final completion of the inspection report and the availability of that report for licensing decisions and Intelligence.</p> <p>Inspections will be conducted in accordance with the compliance standard operating procedures, against the licensing standards.</p> <p>Accuracy will be measured against non-compliances identified by Inspectors from the GLA Standards areas.</p>

## Standards inspection

Target 6.5	Verification timescales
Quantity	<b>80%</b> of verification visits will be carried out within <b>10</b> days of scheduling.
Quality	No more than <b>10%</b> of verification results will be classed as inaccurate, in determining whether a LP should be classed as "TLWG successful".
Narrative	<p>The <b>10</b> day period refers to the final completion of the verification report and the availability of that report for input to the "TLWG database", in preparation for licensing. Verification inspections will be conducted in accordance with the verification standard operating procedures, against the licensing standards. Accuracy will be measured against non-compliances identified by a review by the compliance manager (% check) against the licensing standards.</p>

Target 6.6	Inspection review
Quantity	A minimum of <b>10%</b> of all scheduled inspections will be quality inspected during year one of GLA operations.
Quality	No more than <b>15%</b> of of Inspection results will be classed as inaccurate against the licensing standards.
Narrative	<p>The Inspection Standards reviews will assess the effectiveness of the Inspection regime, the Inspectors understanding of it, together with its application, and the inspector's performance in terms of quality and consistency. Inspection standards reviews will be dependant on both resources and the length of time each individual inspection is scheduled for. Accuracy will be measured against the application of the licensing standards, and compliance standard operating procedures.</p>

## Enforcement

<b>Target 6.7</b>	<b>Investigation timescales</b> (from initiation to appropriate conclusion – e.g. appropriate sanction, if offences are proven).
Quantity	<p><b>90%</b> of labour provider investigations requiring sanction to be referred to DEFRA Legal, DARDNI or the Procurator Fiscal (as appropriate) or their agents, for a decision within <b>3</b> months of the date of allocation to an investigating officer.</p> <p><b>90%</b> of labour user investigations requiring sanction to be referred to DEFRA Legal, DARDNI or the Procurator Fiscal (as appropriate) or their agents, for a decision within <b>6</b> months of the date of allocation to an investigating officer.</p> <p>Those labour provider cases not requiring sanction to be closed by enforcement management team within <b>3</b> months of the date of allocation to the investigating officer.</p> <p>Those labour user cases not requiring sanction to be closed by enforcement management team within <b>6</b> months of the date of allocation to the investigating officer.</p>
Quality	<p><b>90%</b> of all investigations (both labour providers and labour users) that are considered appropriate for prosecution, against the prosecution policy, should be accepted by DEFRA Legal, DARDNI or the Procurator Fiscal (as appropriate) or their agents, on a “right first time” basis (i.e. the investigation and evidence meet all legal and statutory codes of practice requirements).</p>
Narrative	<p>The key factor is the turnaround time involved in concluding an investigation. The time at which the referral to Defra Legal will be made will be at the conclusion of the investigation. This will be when all evidence has been gathered and either a prosecution or sanction is sought.</p> <p>It is felt that labour provider investigations will be simpler than labour user investigations. The targets are therefore different.</p> <p>Not all cases accepted for investigation will reach the point where a formal sanction can be applied (e.g. upon investigation), the intelligence may prove inaccurate or flawed, or it may be decided as not in the public interest to proceed. Such cases will be closed without referral to Defra Legal, DARDNI or the Procurator Fiscal (as appropriate).</p> <p>Defra Legal, DARDNI or the Procurator Fiscal (as appropriate) will only accept cases once they are to the criminal standard. As all investigations should be to this standard, it was felt that an acceptance of a case by Defra Legal would indicate that the case was to a suitable quality standard.</p> <p>All cases will be managed against the enforcement standard operating procedures.</p>



### Objective 7 – Hampton implementation

The GLA will work with the Health and Safety Executive to ensure that the merger of the GLA is implemented efficiently within the requisite timescales.

Target 7.1	Merger of GLA and HSE
Quantity	The GLA will contribute enthusiastically to the process of merger and has been a major contributor to the Project Steering Group which will be set up to ensure the successful merger takes place by no later than 31st March 2009.
Quality	It is imperative that the merger encompasses all of the salient features of the Hampton recommendations thereby showing benefits in terms of better regulation and more effective delivery rather than a purely cost cutting exercise.
Narrative	<p>The GLA is fully committed to the principles of merger into the Health and Safety Executive as detailed in the Hampton report of 2005. Post April 2006 the GLA will be able to announce a fully researched timetable for the various consultations and approvals that will be required to enable the merger to be completed effectively and efficiently.</p> <p>During that time members of the steering group will be in the process of agreeing with colleagues in the HSE a phased transition for such functions as accommodation, staff terms and conditions, recruitment and funding.</p>

## Financial Management

Details of the income and expenditure for 2006/07 are set out at appendix 2.



# Appendix I

## Member organisations of the Gangmasters Licensing Authority Board

### Representative members

#### The Association of Labour Providers (ALP)

David Camp  
Roger Burrows

#### National Farmers Union (NFU)

Sharon Cross  
Phil Hudson

#### National Farmers Union Scotland (NFUS)

Lisa Webb

#### Trade Union Congress (TUC)

Nick Clark  
Bill Snell

#### Transport and General Workers Union (TGWU)

Chris Kaufman  
Martin Smith (GMB)

#### British Retail Consortium (BRC)

Chris McCann

#### Food and Drink Federation (FDF)

Robert Price

#### Sea Fish Industry Authority (SFIA)

Iain MacSween

#### The Recruitment and Employment Confederation (REC)

Marcia Roberts

#### Local Authority Coordinators of Regulatory Services (LACORS)

Geoffrey Theobald

#### Police Superintendents Association

Russell Hardy

#### Association of Chief Police Officers (ACPO)

Graham Maxwell

#### Shellfish Association of Great Britain

Colin Macdonald

#### Fresh Produce Consortium (FPC)

Nigel Jenney

#### National Association of Citizens Advice Bureau (NACAB)

Jane Betts

## Ex officio members

Secretary of State for Home Affairs

Secretary of State for Work and Pensions

Secretary of State for Trade and Industry

The Director General of the Health and Safety Executive

The Scottish Ministers

The Welsh Assembly for Wales

Secretary of State for Environment, Food and Rural Affairs

The Commissioners of Inland Revenue and the Commissioners of Customs and Excise jointly

The Minister for Agriculture and Rural Development for Northern Ireland

## Official observer

Ethical Trading Initiative (ETI)

Dan Rees



# Appendix 2

## Income and expenditure for 2006–2009

	2006–7	2007–8	2008–9
<b>Income</b>			
Licence Fees	498,750	1,087,000	1,220,407
Application Inspection Fees	850,000		
<b>Total Income</b>	<b>1,348,750</b>	<b>1,087,000</b>	<b>1,220,407</b>
<b>Expenditure</b>			
Pay Costs	1,187,684	1,240,950	1,292,656
Non pay Costs	1,529,176	659,595	694,311
<b>Total Expenditure</b>	<b>2,716,860</b>	<b>1,900,545</b>	<b>1,986,967</b>
<b>Less Transfers</b>			
Overheads to Enforcement	657,774	769,352	766,560
Set up Costs	767,200		
	1,424,974	769,352	766,560
<b>Net Expenditure</b>	<b>1,291,886</b>	<b>1,131,193</b>	<b>1,220,407</b>
<b>Surplus/(Deficit)</b>	<b>56,864</b>	<b>(44,193)</b>	<b>0</b>



# Appendix 3

## Members of the GLA Executive

Chief Executive

**Mike Wilson**

Deputy Chief Executive and Director of Finance

**Ray Dawson**

Director of Operations

**Darryl Dixon**

Director of Policy and Communications

**Nicola Ray**





Gangmasters Licensing Authority  
PO Box 8538 ■ Nottingham ■ NG8 9AF  
[www.gla.gov.uk](http://www.gla.gov.uk)  
e: [enquiries@gla.gsi.gov.uk](mailto:enquiries@gla.gsi.gov.uk)  
t: 0845 602 5020  
f: 0115 900 8943