













Gangmasters &  
Labour Abuse Authority

# GLAA Performance Report – 20/21

Working in partnership to protect vulnerable and exploited workers

<p><b>Identify and support victims of labour exploitation</b></p> <ul style="list-style-type: none"> <li>• Number of victims below target</li> <li>• NRM referrals low</li> <li>• Target exceeded on MS1 referrals</li> </ul>		<p><b>Disrupt and deter criminal activity within the labour market</b></p> <ul style="list-style-type: none"> <li>• GLAA led investigations is on target</li> <li>• GLAA investigations in partnership is slightly under target</li> <li>• Prosecutions, warning and notices impacted by Covid</li> </ul>	
<p><b>Maintain a credible licensing scheme</b></p> <ul style="list-style-type: none"> <li>• Average days for inspections is over target</li> <li>• Targeted work has been carried on obj 2 data</li> <li>• YTD average days for inspections shows improvement</li> </ul>		<p><b>Develop our people and culture in line with the GLAA's values, ensuring a diverse, resilient and change-ready organisation</b></p> <ul style="list-style-type: none"> <li>• Absence and turnover rates below benchmark</li> <li>• Progress made against ethnicity reporting</li> <li>• New PDR and PDP process</li> <li>• Mental health first aider cohort significantly increased</li> <li>• Increase in people declaring ethnicity</li> </ul>	
<p><b>Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation</b></p> <ul style="list-style-type: none"> <li>• Successful construction and LU/LP webinars</li> <li>• MSPEC award rights lab £48k for research into Romanian workers</li> <li>• £55k awarded to GLAA for prevention initiatives</li> <li>• Online impressions down 11% whilst engagement remains high</li> </ul>		<p><b>Provide efficient and effective services, sound governance, robust risk management and value for money</b></p> <ul style="list-style-type: none"> <li>• Assurance rating remains at limited</li> <li>• Progress against audit actions</li> <li>• Risk maturity assessed as developing</li> </ul>	

<p>Under target</p> 	<p>Progress made</p> 	<p>Targets mostly met</p> 	<p>Targets met/exceeded</p> 
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# Key findings

- There continues to be high engagement through training and the protocols and the GLAA qualification has been developed and will be monitored through 21/22. Engagement through social media remains positive as does engagement with communities and stakeholders through our prevention work. Most notably the high audience numbers through the webinar platforms and a high increase in visitors to the GLAA website. This may be linked to seeking guidance during Covid or new businesses moving into the regulated sector looking for advice (obj 3).
- With regards to the regulated sector, the target for AI's and CI's had not been reached this year, although as can be seen by the median range, suggesting the cause for missing the target is due to outliers and reduction in resource needed to make licensing decisions, as seen in the increase in licensing decisions on licence revocations and ALC's. There has been a substantial increase in AI's this year which, due to Covid, have been carried out remotely. It is not possible to carry out CI's remotely and therefore fewer have been done. This has had an impact on the number of victims that we have been able to identify through this means. Substantial work has been done on objective 2 to improve performance and efficiencies in process.
- The above links to objective 1 of identifying victims, which has not achieved its target by 5%. Whilst the GLAA remained operational during the Covid pandemic, changes to the way we worked in compliance has had a small impact. Most notably is the significant increase in MS1's which is contrasted by the reduction in NRM referrals. Engagement with the Home Office on this issue is in hand to understand victims reluctance to enter the NRM. Eight percent of enforcement cases have resulted in an NRM or MS1. The majority of the GLAA potential victim identification is for issues which are not related to modern slavery. .
- Through the work of operation TACIT ( Leicester Garment Sector) and other operational activit the GLAA has led and worked in partnership across many investigations, however the GLAA has not met its target for partnership working, this is entirely attributable to the Covid Pandemic where some traditional partners had ceased operational activity. The GLAA however has remained engaged where practicable. Other disruption activities notably prosecutions have been severely impacted through court closures and backlogs. The GLAA though has this year successfully obtained its first slavery and trafficking risk orders, 3 in total, which provide significant opportunities to prevent and disrupt modern slavery(obj 4).
- Positive work has ben done introducing a new PDR process better linking to values and a focus on individual and team development. Throughout the year the GLAA sickness rates have been significantly under that of public sector averages. It is anticipated that this is mainly due to people working from home and more likely being still able to work if feeling unwell. Respiratory infections have seen a reduction, however mental health concerns have increased across UK. Whilst staff turnover has also reduced this year, data from the most recent people survey indicates that work remains to be done (obj 5).
- First and second line assurance remains an area for focus and things are in place to address and remedy in the coming year, however we end the year missing this target of having a rating of at least moderate. Progress against audit actions has seen significant improvement with evidence of actions being progressed. Whilst this is a positive step there is still work to be done on the quality and timeframes of the recommendations. GLAA has managed its budget and lived within its means (obj 6)





### 3. Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation

Measure	Target	20/21 YTD
Impressions	Average monthly impressions <b>438,996</b>	Average monthly impressions <b>477,539</b>
	2019-20 total impressions <b>4,789,039</b>	2020-21 YTD impressions <b>4,297,850</b>
<b>Average engagement rate 2020-21</b>		
Twitter <b>1.43%</b>		
Facebook <b>5.22%</b>		
LinkedIn <b>4.9%</b>		
<b>Number of partnership or training events delivered by operational personnel</b>		<b>Number of persons reached</b>
<b>FY20/21</b>		<b>FY20/21</b>
<b>2019-20</b> 117		<b>2019-20</b> 4,121
<b>2020-21</b> 71		<b>2020-21</b> <b>3,443*</b> (does not include prevention activity from enforcement Oct-Dec)

- Attendance at the GLAA LU/LP and joint liaison group webinars surpassed all expectations following transition to a webinar new platform. GLAA also moving into producing podcasts as part of our wider digital engagement offer.
- GLAA partnership bulletin now sent directly to the inbox of approximately 1,400 subscribers
- We ran our first live 1-hour Q&A on Twitter to field and answer questions about the work of GLAA earning praise from Independent Anti-Slavery Commissioner for our engagement approach.
- The GLAA's website ranked fourth out of more than 300 Government and Public Bodies, for the work we've done to ensure our site is accessible to people with disabilities.
- GLAA, in partnership with the Skills Education Group, designed its first national qualification around worker rights and preventing labour exploitation'.
- GLAA successfully supported the University of Nottingham Rights Lab who were awarded £48k to undertake research aimed at reducing the risks of exploitation for Romanian seasonal labour migrants after COVID-19.
- Successful funding bids to the Home Office totalling £55k to progress two pilot projects – the 'Worker Rights and Preventing Labour Exploitation' national qualification and the Responsible Car Wash Scheme.
- A key partner in developing a modern slavery resource pack produced by the Wilberforce Institute, to be used by anti-slavery partnerships across England and Wales.
- Signatories to the construction protocol increased by 25% with up to 100 attendees at the first construction protocol webinar.
- GLAA delivered modern slavery and labour exploitation awareness training to 130 agriculture business managers supporting Barclays Bank Modern Slavery Awareness week.
- Delivery of bespoke training to 89 frontline UK Border Force colleagues focusing on labour exploitation, trafficking, spotting the signs at the borders and creating a workable framework around reporting and shared intelligence.
- Key contributor to Leicester City Council's community engagement strategy - participating at the Leicester Business Festival launching #EndGarmentSectorSlavery campaign





# 3. Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation


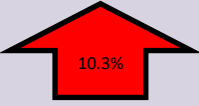



## Review

- The GLAA saw substantial increases to the GLAA website, in particular during April 2020. Reasons for this were due to an increased number of vacancies advertised on the website, and also covid-related guidance for industry in terms of GLAA operating as usual.
- Social media impressions exceeded the monthly average target, however missed the yearly impression target. The average was driven up by almost 1.1m impressions, led by facebook at just under 900k, in July 2020. This performance on facebook impressions in July is more than double the next highest month. Engagement on social media has increased on Facebook and LinkedIn, however Twitter has fallen back to similar levels at the beginning of the year despite having a high point in October 2020. This has been offset by the inability to do face to face engagement. It is also worth noting that there has been an increase in the breadth of audience that we have been able to engage with moving to online events
- Awareness training has continually been delivered to third parties, some notable examples being:
  - UKBF - 89 attendees
  - LU/LP liaison meeting - 90 attendees
  - Leics. Business Festival (Garment Trade Campaign) – 20 attendees
  - Leics. Fire & Rescue (Fire Prevention Officers) - 15 attendees
  - Construction Clients Leadership Group - 20 attendees
  - Virgin Media groundworks teams - 25 attendees
  - GLAA Construction Webinar - 90 attendees
  - Poultec (Poultry industry training arm) – 16 attendees
  - Leics. Fire & Rescue (Safeguarding & Community Educators) - 12 attendees
  - Black Country Partners Briefing - 11 attendees
  - Supply Chain Sustainability School - 80 attendees
  - Nottingham College – 20 attendees





## 2. Maintain a credible licensing scheme

Measure	Target	20/21 Average	20/21 Median	Progress against target
Days taken to complete application inspections <b>2019-20 outturn = 68</b>	<b>65 working days (5% reduction)</b>	<b>80 working days</b> (152 AIs)	<b>67 working days</b>	 23%
Days taken to complete compliance inspections <b>2019-20 outturn = 163</b>	<b>155 working days (5% reduction)</b>	<b>171 working days</b> (37 CIs, 2 CNBs, 25 CPAs)	<b>155 working days</b>	 10.3%
Days taken to make a licensing decision once all information is available <b>Reduce to 5 days, 2 days and 1 day respectively.</b>	<b>Revocation = 5 days</b> <b>ALC = 2 days</b> <b>Grant of licence = 1 day</b>	<b>Revocation = 7 days</b> <b>ALC = 10 days</b> <b>Grant of licence = 5 days</b> (excluding 1 outlier)		  





## 2. Maintain a credible licensing scheme




### Review

- We have focused on performance in this area this year and identified a number of issues with data quality and performance that are being addressed through an action plan. Specifically in February and March 2021 the Licensing Team focused on dealing with cases which could be actioned promptly. This appears to have had a minimal impact on the outturn for 20/21. Throughout the year, there has been a shortage of available resources to deliver the increased workload due to the demands of the GLASS project, long-term sickness and vacancies in the Licensing and Appeals team. There has also been a move to conducting virtual application inspections which has caused some delays as we adjusted to the new process. There have been cases which have been delayed as documentation has not been sent promptly by applicants or they have failed to agree a time for the inspection without being chased up several times. This was due in part to businesses moving to working from home at short notice and not having access to systems and also as some applicants were shielding and did not make themselves available for an inspection. The numbers of AI's has also increased by X% and we will be looking at the reasons for this. We know that there were high numbers of businesses that failed to renew on time and then reapplied for a licence. We also know that the food production sector was buoyant and so attracted a number of new businesses looking for opportunities to supply workers.
- We have carried out less compliance activity this year as the restrictions of the pandemic have made it more difficult to do physical inspections on food processing sites and there have been higher levels of applications which are prioritised over compliance activity. Additionally, the team prioritised cases which were viewed as old at the start of the first lockdown. The outstanding CI cases are being risk managed.





# 1. Identify and support victims of labour exploitation

Measure	Baseline	20/21	Progress against business plan (projected)	Target	Total
Potential victims identified <b>Increase 2018-19 totals by 10%</b>	<b>7,396</b>  Victims of labour market offences/MSHT encountered as part of enforcement activity = 1,658  Victims of Licensing Standards Breaches = 5,738	<b>7,728</b>  Victims of labour market offences/MSHT encountered as part of enforcement activity = 2,133  Victims of Licensing Standards Breaches = 5,595  Op Tacit = 468	 5.2%	8,135	<b>7,728</b>  <i>(originally projected to hit 6,992)</i>
NRM and MS1 referrals <b>Increase 2019-20 by 10%</b>  <i>NRM referrals</i> <i>MS1 referrals</i>	<b>67</b>  <b>33</b> <b>34</b>	<b>102</b>  <b>10</b> <b>92</b>	 13%	116	<b>102</b>
Proportion of enforcement cases resulting in an NRM or MS1 form <b>Increase 2019-20 proportion</b>	<b>12%</b>	<b>8%</b> (16 out of 202 cases tasked)	 33%	12%>	<b>8%</b>

## Money recovered

2019-20  
£166,605.30



2020-21  
£14,856.26

## Workers assisted

2019-20  
2,374



2020-21  
1,834







# 1. Identify and support victims of labour exploitation

## Review

- The yearly outturn in terms of potential victims identified is broadly in line with the year 10-20 despite the GLAA changing its working practices to mitigate the impacts of Covid 19, for example the focus of inspection activity has been on application inspections (AI's) the majority of which have been virtual.
- Our enforcement activity whilst not as impacted by our working practices has had significant parts of the UK labour market closed for extended periods of time has still identified significant quantities of potential victims. The combined target for NRM and MS1 submissions was only narrowly missed.
- NRM and MSI submissions only relate to potential victims of modern slavery, and given the impact on the UK labour market with many high risk sectors closed, performance in this area has held up as well as good have been expected.
- Operation Tacit partnership activity also identified 468 potential victims from the factory visits undertaken, and whilst significant, even taking this into account the identification of potential victims was broadly in line with 2019-20 in what have been difficult operating conditions.



## 4. Disrupt and deter criminal activity within the labour market

Measure	19-20 Baseline	Target	2020-21
Enforcement & NSO investigations led by the GLAA <b>To maintain the baseline</b>	<b>226 out of 350</b> <b>65%</b>	<b>65%</b>	<b>380 out of 476</b> <b>79.6%</b>
Enforcement & NSO investigations in partnership <b>To maintain at approximately 40% of investigations.</b>	<b>164 out of 350</b> <b>47%</b>	<b>40%</b>	<b>126 out of 476</b> <b>26.4%</b>
Convictions**	<b>8 (plus 15 other)</b>	<b>10</b>	<b>0</b>
LMEUs	<b>6</b>	<b>18</b>	<b>8</b>
LMEOs	<b>0</b>	<b>1</b>	<b>0</b>
Warnings	<b>23</b>	<b>34</b>	<b>14</b>
Enforcement Notices	<b>43</b>	<b>47</b>	<b>17</b>
STROs	<b>0</b>	<b>N/A</b>	<b>3</b>
Arrests	<b>16 (+13 assists)</b> (18 further persons IUC'd)	<b>N/A</b>	<b>6 (+14 assists)</b> (18 further persons IUC'd)
<b>2019-20</b> Licences refused = 16 Licences given ALCs = 42 Suspensions = 0 Revocations = 23  <b>Cases referred to CPS = 5</b>		<b>2020-21</b> Licences refused = 8 Licences given ALCs = 36 Suspensions = 0 Revocations = 12 CPA refused = 1 (by physical inspection)  <b>Cases referred to CPS = 3</b>	

Op TACIT\*

224 factory visits  
41 led by other agencies  
183 led by GLAA

\*Due to the volume of work for one syndicate to manage these cases, a decision was made to record all Op TACIT activity as one entry on the case management system.

\*\*Covid-19 has had a direct impact on GLAA-led convictions. This is due to the courts closing during the early stages of the pandemic and accumulating a backlog on cases. Whilst performance is forecasted to below target on all elements of convictions, work is underway to push cases through the nightingale courts before the end of the year





## 4. Disrupt and deter criminal activity within the labour market

### Review

- GLAA operational activity has held up well during this difficult year, and whilst understandably the numbers of investigations is lower than last year the percentage of those led by the GLAA is significantly improved- Need to put percentages in. Partnership activity has been affected by the changes of working practices during the year of some key labour market enforcement partners. However Operation Tacit is an excellent example of the partnership work done in this period .
- Whilst GLAA prosecution cases have been impacted with court delays and court backlogs, we continue to make progress and a number of cases have had positive charging decisions this year. A notable one being Operation Ropewalk a modern slavery case in Cumbria where a man had been kept in a shed for 40 years. 2 men have been charged and appeared at court for this matter.
- Other cases impacted though show a different story where a case scheduled to have a court trial in May 2020 has been pushed back to January 2022.
- The GLAA have secured its first Slavery and Trafficking Orders during the year, 3 orders have been secured from the courts impacting a single family trafficking and exploiting workers from abroad into the UK.
- The issuing of LMEU/Os, warnings and enforcement notices served this financial year are clearly some way below both the target and the amount last year, they have been affected buy our risk assessment process through the national pandemic, changes to our working practices aimed at keeping workers and our people safe, meant at time visits were restricted to those investigations deemed to be high risk of which enforcement notices and warnings were not appropriate disposals.





## 5. Develop our people and culture in line with the GLAA's values, ensuring a diverse, resilient and change-ready organisation

Measure	Baseline	20/21
Sickness rates (% of working days lost due to sickness absence) <b>To maintain or reduce %</b>	GLAA 2019-20 <b>2.98%</b>  Public sector average (2018) <b>2.90%</b>	GLAA 2020-21 <b>1.93%</b>  Public sector average (2019)* 3.3%
People turnover <b>To reduce and fall under the national public sector average</b>	GLAA 2019-20 <b>21.6%</b>  Public sector average (2018) <b>17.9%</b>	GLAA 2020-21 <b>14.3%</b>
To move closer to the national workforce figures based on gender and ethnicity	<b>Female employees</b> GLAA 2019-20 = <b>37%</b> Civil Service average = <b>53.9%*</b> UK Police average = <b>30%**</b>  <b>BAME employees</b> GLAA 2019-20 = <b>5.8%</b> Public sector average = <b>12.7%*</b>	<b>Female employees</b> GLAA 2020-21 = <b>36%</b>  <b>BAME employees</b> GLAA 2020-21 = <b>4.2%</b>
Proportion of GLAA people who do not declare their ethnicity to organisation <b>To reduce by 10%</b>	46%	<b>35%</b>
People Survey Results	(GLAA 2018) Performance effectively managed and meeting with line manager: 81%  Proud to work for the GLAA: 94%  Treated with fairness and respect: 84%	Performance effectively managed and meeting with line manager: 86%  Proud to work for the GLAA: 79%  Treated with fairness and respect: 86%

\*The public sector average for 2020 will not be published until July 21





## 5. Develop our people and culture in line with the GLAA's values, ensuring a diverse, resilient and change-ready organisation

### Review

- There is a separate paper provided on the People Survey results which will be covered today, and includes comparisons with the 2018 survey, the results of which are interesting.
- Throughout the reporting period the GLAA has recorded significantly under the national public sector average (indicative data from ONS to March 21) for % of working days lost as a result of sickness absence. This is a decrease of over 1/3 as compared to the last reporting period. It is likely that the impact of Covid19 has played a major part in this, as around 40% of the organisation who would normally be office based have been working from home, and additionally operational activity has reduced due to the pandemic.
- This may mean that in real terms sickness has reduced as employees feel able to work from home even if they do not feel well enough to leave the house for work, we do know across the UK that non Covid19 related respiratory infections have vastly reduced in the period due to the restrictions imposed by the pandemic reducing normal transmission. However we do know that mental health concerns have increased for the same reasons, so it may be that overall some sickness is being 'masked' due to the changed circumstances. We have significantly increased our cohort of mental health first aiders.
- Employee turnover has significantly reduced over the reporting period, by over 1/3. However, it is likely that this is at least largely as a result of the effects of the pandemic, in terms of uncertainty, reductions in vacant posts in the job market, and a reluctance to leave secure employment in the circumstances. We know from exit interview data and the recent People Survey that there is work to do on employee engagement to prevent attrition levels returning to previous levels.





## 6. Provide efficient and effective services, sound governance, robust risk management and value for money

Measure	19/20 baseline	Target	20/21
Self-Assessment against assurance model	Limited	<b>Moderate</b>	Limited
Improve end of year overall Internal audit opinion	Number of Overdue Audit Actions = 17 Number of Open Audit Actions = 17 Number of Open High Priority Actions = 6		Number of Overdue Audit Actions = 6 Number of Open Audit Actions = 11 Number of Open High Priority Actions = 3
Assessment by DPO as agreed with Audit and Risk Committee	N/A	<b>To be assessed as compliant</b>	Part compliant





## 6. Provide efficient and effective services, sound governance, robust risk management and value for money

- The GLAA has managed its budget and lived within its means. Work on developing cost apportionment to illustrate the cost of GLAA activities continues to be progressed.
- The self assurance was rated as limited, however much of the work that has been initiated at the end of 2020 will not have had time to have an effect. Significant work is ongoing internally and in liaison with GIAA to build our capabilities around first and second line assurance, which remains our key areas of weakness.
- There have been 14 actions from Audit this year, 5 have been completed, 3 are not yet due and 6 are over due. Of those that are overdue, 1 is high priority and relates to the governance around PDR processes and work is underway. Close working with GIAA is ongoing and going forward actions will be managed through the Organisational Assurance Group. Much of the assurance work planned for 21/22 will address some of the actions, and the remaining actions feature in the business plan.
- Due to Covid, work around compliance to GDPR has not been able to be carried out and there is more work to be done with the retention and destruction schedule which is underway.

