

Official: Strategic Plan 2020-23 and Business Plan 2021-22

19 March 2021

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Chair and Chief Executive's foreword



Our **vision** is for the Gangmasters and Labour Abuse Authority to be a world class organisation in the fight against labour exploitation.

Our **mission** of working in partnership to protect vulnerable and exploited workers is both challenging and complex. Labour exploitation and modern slavery have been identified as a national threat as well as an international problem and the harm caused is significant.

This year marks the second year of the three-year strategic plan approved by the GLAA Board and Home Office Ministers. The successful delivery of this plan will help us achieve our mission to reduce labour exploitation and modern slavery, through maximising our own effectiveness and working with partners to protect vulnerable and exploited workers.

The GLAA is a small independent regulator with a specialist law enforcement capability. We work collaboratively through our UK-wide licensing remit and specialist enforcement powers to combat the exploitation of vulnerable workers and tackle labour market offences, including forced labour. We drive awareness of labour exploitation and modern slavery throughout industry and encourage its prevention by highlighting the signs and encouraging due diligence in supply chains. We continue to support legitimate businesses but remain the enemy of exploitative practices.

Our approach is centred on the three priorities to: **Prevent** labour exploitation; **Protect** vulnerable and exploited workers; and **Pursue** criminals who prey on their workers.

We are an intelligence-led organisation, using analysis and evidence to prioritise and focus on high-risk sectors that employ some 10 million workers (GLAA Strategic Assessment July 20) including agriculture, car washes, shellfish gathering, food service, construction, cleaning, transport/courier and food processing and packaging. This intelligence-led approach means we are flexible and agile in our deployment of resources, focussing on areas of greatest threat and harm to the workers we exist to protect.

Whilst this operational focus will remain over the period of this plan, our organisation is set to change. The Government has committed to create a Single Enforcement Body (SEB) to tackle labour exploitation in all its forms.

We believe SEB is an opportunity to support compliant businesses, to enhance further

protections for workers and to identify and prosecute exploiters. We look forward to playing a pivotal role in the creation of the SEB, so that the UK is better able to enforce employment law, prevent and tackle labour abuse in all its forms. Whilst this will bring complex transformational changes, we will ensure that the delivery of the GLAA's core mission is maintained.

In preparing this plan, we have accounted for two very significant external factors – COVID-19 and Brexit. The GLAA remained operational during the pandemic and responded to Government guidance by transforming our working practices. This ensured we were able to maintain services and deliver a frontline operational response. We also found ways to ease licensing pressures on the food supply chain whilst not introducing new risks for workers. The impact of Brexit and the Immigration Act on employment patterns in the UK is still evolving.

As we move forward, we will review our business and operations to embed lessons learnt, as well as shape future continuity plans. The scope for the exploitation of workers may increase in a post-Brexit, COVID-19 world and the GLAA will remain vigilant.

The GLAA will reflect its performance in reports to the Board throughout the year, and in the Annual Report and Accounts for 2021-22.

Over the duration of this plan, we also have internal factors to consider. We look forward to welcoming a new Chief Executive and there will be changes to Board including a new Chair. GLAA will also be undertaking important work around diversity, equality and values to ensure our culture is as inclusive and supportive as it can possibly be.

Our vision: To be a world class organisation in the fight to tackle labour exploitation

Our mission: Working in partnership to protect vulnerable and exploited workers

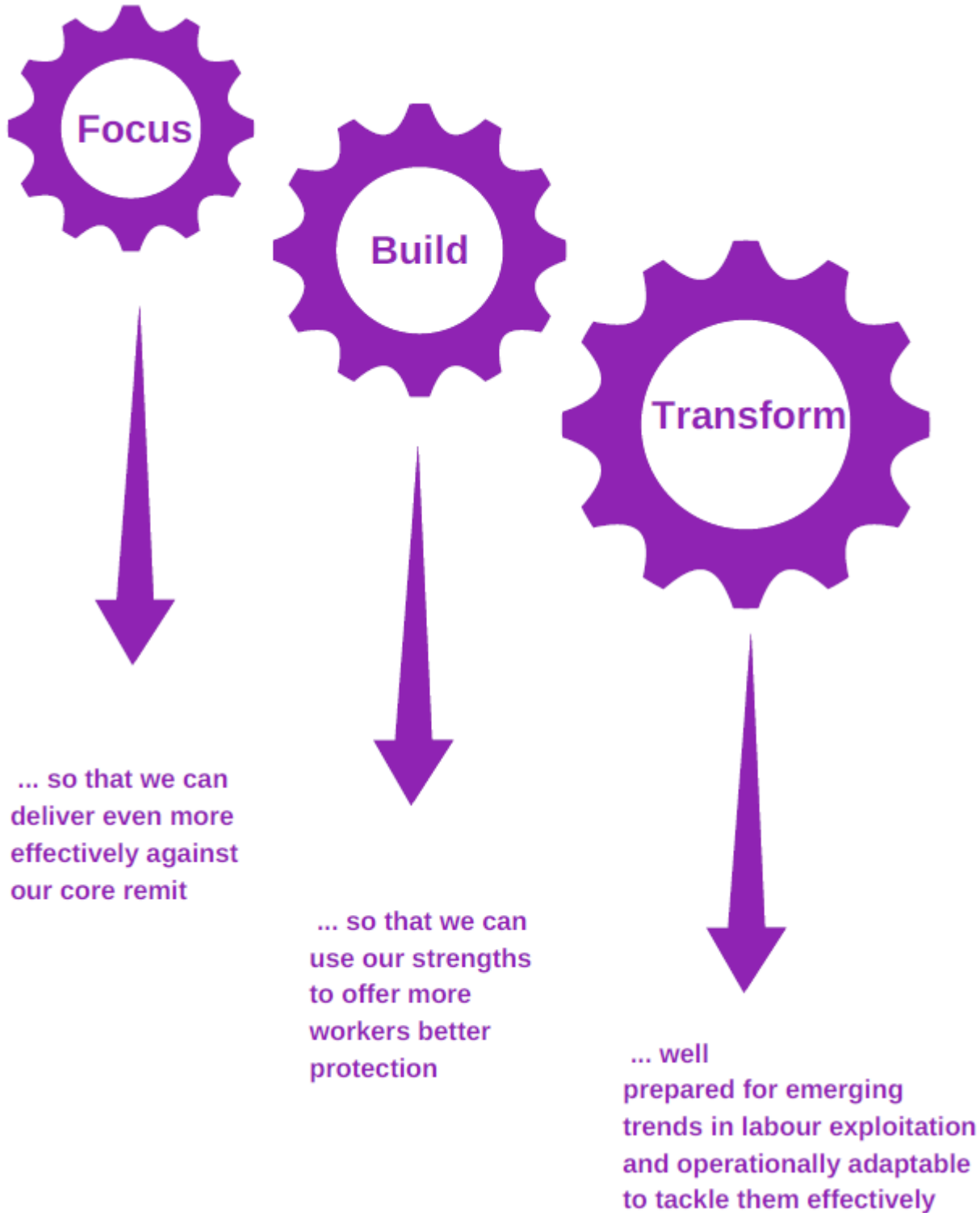
GLAA values

GLAA colleagues, working together, have developed a set of five values to which every Board member and every GLAA employee aspires. The GLAA is accountable against these values both as regards how colleagues work with each other and in all our interactions with external organisations and individuals.



The future at a glance

The 3-year strategic plan has distinct milestones for each year. Year 1 **focuses** efforts to deliver against our core remit. Year 2 aims to **build** on the positive base on year one to do more for victims. Year 3 aims to take all previous efforts and successes and create a **transformative** organisation leading the way in the fight against labour exploitation.



Introduction

This year we have again brought together our strategic three-year plan and the business plan for 2021-2022 into a single document to provide greater clarity on what we plan to do, when and how our aspirations and actions link together, and how our progress and performance can be reported.

Part 1 covers the updated Strategic plan for 2020-23. This part describes, by each objective what we believe success will be over the 3-year period and what we will do in that time to achieve success.

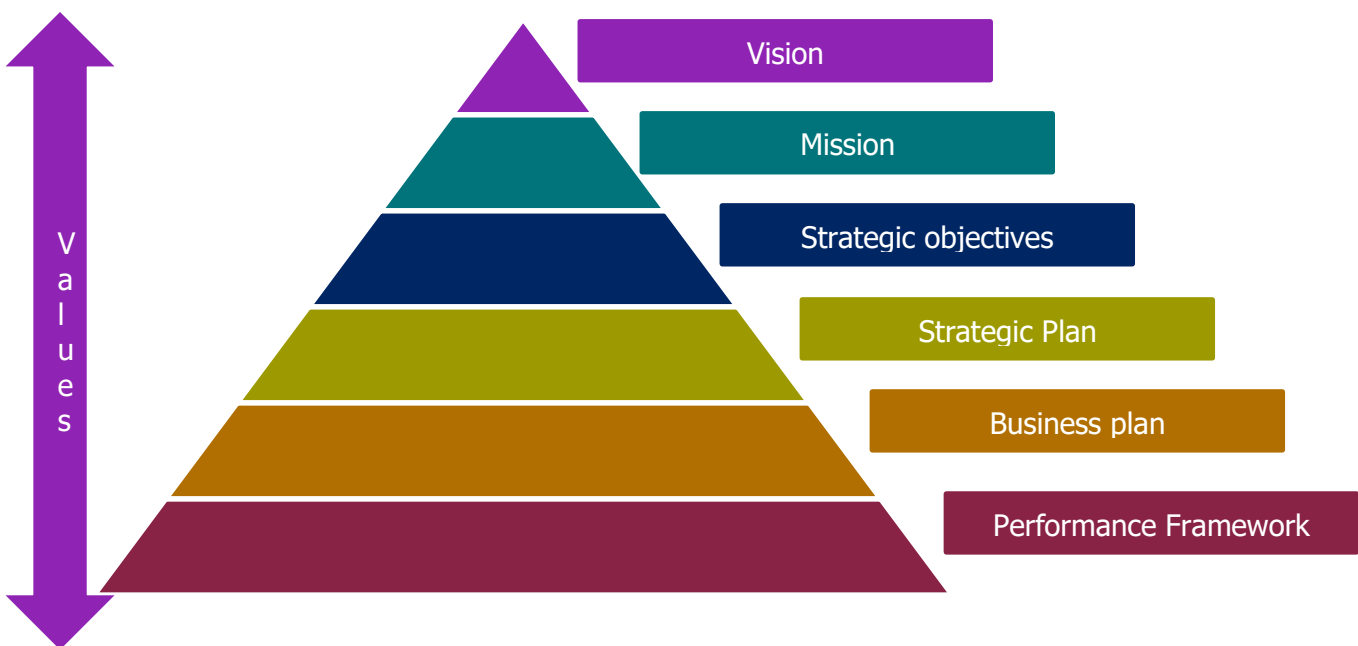
Part 2 is the Business Plan for 2021-22. This part provides specific detail by each objective, on the key deliverables that will be achieved in year to ensure the success of the overall 3-year strategic plan.

Part 3 is the Performance framework for 2021-22. This part illustrates the metrics that will be collected and reported on to ensure the things set out in the Business plan on track.

The Business plan sets out all the work the GLAA will undertake in year and will be reviewed quarterly by the GLAA executive and reported to the Board to demonstrate progress.

The Performance framework will be used to create monthly reports for scrutiny by the GLAA executive to monitor progress of the Business plan deliverables and other key management operations. Cost and risk will be included in the Performance framework to support decision making on use of resources.

The below graphic illustrates how the strategy, business plans and performance link together:



The strategic direction for the GLAA that underpins the 2021-22 business plan gives context to the activities and ambitions for the organisation and builds towards the SEB. The GLAA will:

- Have an inclusive, resilient workforce operating to our values
- Be an agile threat, risk and harm led organisation
- Be effective and efficient in our response to risks
- Be a well governed organisation
- Demonstrate value for money in all our endeavours
- Be customer responsive in our regulatory regime

During 2020-21 the GLAA implemented a senior management restructure and responded to the challenges of COVID-19. These factors had an impact on how the GLAA approached 'year 1' of the 2020-23 strategy. The restructure has taken time to embed and the focus during the pandemic has been to maintain the core operational service of the GLAA. For these reasons the 3-year strategy remains broadly the same as published in 2020, and year 2 of the strategy, 2021-22, carries over some of the delayed activity from 2020-21.

Despite the significant challenges that the GLAA has operated under in 2020-21, it has remained fully operational and dedicated to its mission. 2021-22 provides an opportunity to build on the new ways of working and adaptability of its workforce to focus its activity with a forward look to the SEB.

The GLAA's reputation as a world class organisation in tackling and preventing labour exploitation, through licensing, enforcement, and our prevention activity, is one we are determined to grow. We recognise that an ever-changing labour market and changes to business practices require us to adapt to meet those challenges, to strive to maintain our effectiveness in tackling and preventing exploitation, and to work with and earn the trust and confidence of those being exploited.

Confidence in the GLAA will be maintained and grow from:

- being, and acknowledged as being, expert in preventing and tackling labour exploitation,
- continuously improving our regulatory regime and improving compliance processes.
- being successful at safeguarding vulnerable people and putting victims first,
- Working with partners to ensuring vulnerable workers and victims receive the best possible outcomes and support and
- bringing offenders to justice.

In doing so we will uphold the very best traditions of public servants committed to helping others.

In the following pages we set out our long-term plans (the strategic plan), our planned activities for the coming year (the business plan), and our performance targets for 2021-22 under each of the GLAA's six strategic objectives, which are to:



1 Identify and support victims of labour exploitation



2 Have a fair, robust and customer responsive regulatory regime



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



4 Disrupt and deter criminal activity within the labour market



5 Develop our people and culture in line with the GLAA's values



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

About the GLAA's Strategic and Business Plans

The Strategic Plan sets the direction for the GLAA identifying planned activity to improve the effectiveness of the organisation and its contribution to the UK effort to prevent and detect labour exploitation

Alongside our specific objectives in this plan, there are many 'business as usual' tasks and capability building necessary for the smooth running of the GLAA. Whilst these aren't explicitly captured in the objectives, these tasks continue to be essential to the delivery of the GLAA objectives. The following pages set out the objectives the GLAA has committed to delivering for 2021-22.

The strategic plan and the business plan reflect the current key risks and challenges in the environment in which the GLAA operates. These are set out in our annual Strategic Assessment that is used to inform our priorities.

Our approach also takes account of the assessments by other statutory bodies, and partners. These include:

- recommendations for the GLAA set out in the Director of Labour Market Enforcement's annual strategy, as accepted by Government,
- the Independent Anti-Slavery Commissioner's strategic plans,
- the National Crime Agency's annual National Strategic Assessment of Serious and Organised Crime,

Account is also taken of:

- major structural changes affecting the labour market, such as the settled status scheme, the termination of free movement for EU workers, new arrangements to permit foreign workers to come to the UK and other immigration law changes,
- labour law changes arising from the Government's response to the Good Work Plan,

These assessments and other priorities will be affected by the impact of the COVID-19 pandemic, not only on the UK economy, but also worldwide.

The Strategic and Business plans present a clear framework which the GLAA will use to:

- continually improve all aspects of performance,
- enhance public and stakeholder confidence,
- work effectively in partnership to protect vulnerable and exploited workers,
- work collaboratively across Government to ensure a flexible response to future changes to labour market regulation, and
- improve the prevention of exploitation
- Improve the investigation of exploitation.

Operating landscape

The GLAA has a UK wide remit to tackling labour exploitation in the regulated sector (GLAA Licence holders) and discharges its duties under the Modern Slavery Act 2015 in England and Wales. The devolved administrations have different powers when investigating labour market offences.

The GLAA's own assessment of the wider UK labour market has identified several high-risk sectors employing some 10 million workers (GLAA Strategic Assessment July 20).

The GLAA works closely with law enforcement and public sector partners to deliver its mission and bring offenders to justice. There are many third sector and non-governmental organisations throughout the UK that support victims of exploitation and business in developing their due diligence and prevention of exploitation in their supply chains. The GLAA work collaboratively with these victim organisations to offer the best support to victims and encourage business to raise the agenda of labour exploitation within their industries.



The GLAA has operational and prevention measures at its disposal to tackle labour exploitation as it is our assessment that exploitation cannot be tackled by enforcement alone. Prevention activities, encouraging industries to take an active part, and raising public awareness are crucial to our long-term success. We are encouraged by the collaboration that we are forging between the GLAA and the education sector on raising awareness of

labour exploitation and with the partnership approach to the issues in the textile industry in Leicester. We utilise global best practice in the investigation and prevention of labour exploitation, developed by international partners.

Informed by the GLAA's continuous intelligence assessments, which provide a dynamic picture of high risks of exploitation, whether by industry or geographical area, the GLAA will select the most appropriate response to tackle and prevent exploitation. This has been our focus, and which has led to the work we have done with construction, textiles, and car wash sectors, and which we expect to expand through our work with the hotels and hospitality sector, and analysis of issues in the nail bar industry.

In preparing its short, medium to long-term plans, the GLAA is mindful of the development of the SEB and is ready to respond flexibly to future requirements. More information regarding the creation of the SEB is set out later.

Our risk appetite

We are **cautious** when taking risks and our approach is based on judgement and the circumstances of each potential intervention, and an assessment of its impact. This means we will not seek to intervene in all situations, rather we prioritise intelligence-led activity in terms of risk, cost of mitigation and perceived benefits in a consistent and transparent way, choosing the most appropriate course of action in each case.

Resources

Each year the GLAA develops a budget and medium term forecast which places its available resource against the risks the organisation faces and to support the delivery of its strategic objectives. Resources are a key constraint on what the GLAA can deliver. We will seek funding to support new activities that enable the GLAA to deliver its objectives and increase its impact through working in partnership. For example, the GLAA believes that licensing is an effective tool in preventing labour exploitation and that a case can be made to extend the scope of the licensing regime to other sectors where there are demonstrable benefits to doing so. But to do so would require, appropriate additional resources.

Budget

The GLAA has indicative gross revenue funding of [£7.3m] to support its operational activities as a result of funding allocated by its sponsor department the Home Office. It is recognised that there is considerable financial pressure across the public sector. Whilst this is an increase on last year, this doesn't cover all inflation and growth pressures.

GLAA have an indicative capital allocation of [£1m].

The GLAA generates income of [£1.2m] predominately from fees for licensing activity from new applications and licence renewals.



Creation of a Single Enforcement Body (SEB)



In 2019 Government undertook a public consultation on whether a SEB should be created, which featured in the Government's subsequent manifesto commitments.



The GLAA welcomed this proposal and considered that it could:

- ensure that the UK remains at the forefront internationally in eliminating labour exploitation,
- provide a consistent approach to protecting workers, and
- enable a more robust, strategic intelligence-led activity, with an opportunity to close enforcement gaps.

The GLAA recognises that implementation of a SEB is likely to take time and the vehicle for creating it, which is the Employment Bill, is delayed. It is expected that the development of the SEB will influence changes in priorities and planned activities. The commitment to a SEB remains, the GLAA have been engaged and continue to be part of

this development. In 2021-22 the GLAA will focus on core capabilities supporting delivery now and in preparation for the SEB. Where there are isn't yet clarity the GLAA will be mindful of future proofing investments and decisions as best it can in the medium-long term.

However, we expect the core principle of protecting workers will remain at the heart of the mission of any new organisation. Consequently, we expect that our future activities should also be consistent with the plans and structures of the SEB.

In considering the future, and the establishment of a SEB the GLAA's financial plans will identify the resources required to prepare the regulatory landscape for this.

Part 1: Strategic Plan 2020 - 2023



Identify and support victims of labour exploitation

Our mission is to protect vulnerable workers from being exploited. We aim to improve our capability to support the needs of victims

Success by 2023 will be:

Increased victim identification, and self-identification, to the GLAA, with workers more confident and able to report the circumstances of their exploitation.

Demonstrable evidence of a correlation between the GLAA's communication output with increased awareness, education, referrals and identification of victims.

Victims increasingly cooperate with the GLAA's investigations, assured that they will be supported and not at risk of repeat exploitation.

Improved investigation outcomes that proportionately sanction offenders and increase protection for victims.

Better support for victims, reducing levels, and the risk, of repeat exploitation, and assisting their rehabilitation within the economy and for their wellbeing.

Successful restoration of withheld entitlements (e.g. holiday pay) to victims directly through GLAA action in cases of exploitation beneath the modern slavery reporting threshold.

More wide-ranging support for identified victims across broader sectors of the UK labour market, arising from increased effectiveness of the GLAA's penetration of new industry sectors.

Increased confidence of exploited workers to accept the GLAA's support to be referred into appropriate victim support services that meet the victims needs and assisting their willingness to support prosecution of their exploiters.

What we will do:

Develop our understanding of the victim pathway, identifying opportunities to increase victim self-identification and resilience. Working with our partners to ensure victims are properly supported and their needs are met where NRM is not appropriate.

More accurately collect, **collate and analyse outcomes for victims** through GLAA interactions to inform how GLAA support victims.

Take an **intelligence led approach to developing stakeholder relationships** in key communities to promote the work of the GLAA and increase awareness of labour exploitation with workers.

Ensure that **our victim centred approach** is at the heart of any new organisation tasked with regulating the labour market.

Harness the valuable role of GLAA stakeholders in the identification of victims and promotion of worker rights, significantly increasing our reach among workers in high risk sectors.



Have a fair, robust and customer responsive regulatory regime that prevents labour exploitation and drives compliance

We are a proven, credible regulator with a strong reputation amongst licensed labour providers. Our aim is to shift to more proactive regulation, ensuring continued compliance with the licensing standards

Success by 2023 will be:

A regulatory approach that is proportionate and risk-based underpinned by pro-active inspection and robust decision-making.

A licensing regime that enjoys strong support from compliant businesses, balancing regulatory requirements with increased compliance and promoting a level playing field.

Licence holders with high levels of customer satisfaction as a result of effective and efficient service provision throughout the licensing process.

Increased protection for more workers by responding to the changing employment landscape and building on the success of the licensing system by extending protection to further high-risk non-regulated sectors.

A licensing regime that is self-funding, underpinned by a model that can keep pace with changing costs and demands approved by Ministers.

To align the licensing processes to each sector's business model, providing a responsive regulatory regime.

Building on successes in the non-regulated sector, to have more compliant businesses outside the sector without regulation.

What we will do:

Develop a strategy for our approach to our regulatory work which sets out how the GLAA will ensure our compliance activity reflects good regulatory practice without placing an undue burden on business.

Undertake **a review of the licensing standards** within the period of this plan, recognising the potential for new sectors to be licensed with new standards, where this is seen to be appropriate, and incorporating such changes as may arise from new employment legislation.

Undertake a **review of licence fees** to ensure that fee levels are appropriate and are set at a level that properly supports the GLAA's operational activity, manages public money appropriately, and fosters compliant behaviours.

Utilising our digital engagement tools (e.g. webinars) to **drive engagement with stakeholders** in the regulated sector to create a more efficient, responsive and agile regulation regime which improves the customer experience.

Take a **risk based and proportionate approach to inspections** of compliant businesses, to reduce the regulatory burden while ensuring a continuing focus on monitoring and inspecting our licence holders to test they remain fit to hold a licence.



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

We support compliant businesses but are the enemy of irregular working practices. Working in partnership is critical to achieving our aims. We intend to expand the GLAA's outreach to engage with a larger number and more diverse range of stakeholders

Success by 2023 will be:

Increased joint working with stakeholders to prevent exploitation occurring, expanding support to their innovative approaches that change behaviours and protect workers.

Demonstration that the GLAA's programme for the sharing of intelligence trend analysis has increased the awareness of emerging risks, enhancing the protection of workers from those risks, and the reporting of potential risks of labour exploitation.

Demonstrable changes in the approach, understanding and accountability of labour exploitation in industry stakeholder groups, greater engagement with the GLAA, and evidence of effective due diligence to prevent exploiters infiltrating supply chains.

A framework for different stakeholder/industry groups that has delivered cross-sectoral best practice and learning, continued change and protection for workers.

Playing a key role in the development, operation and integration of a cross-Government prevention programme providing coordinated prevention support for business and victims.

What we will do:

Led by the GLAA's intelligence assessment, **enhance preventative awareness within industry sectors** with the highest risks of exploitation, working with key industry stakeholders, and explore different sector-specific approaches to engaging with business and workers to raise awareness and generate increased actionable intelligence.

Embed the prevention strategy organisation wide, enabling GLAA colleagues to engage and contribute to the impact of the strategy.

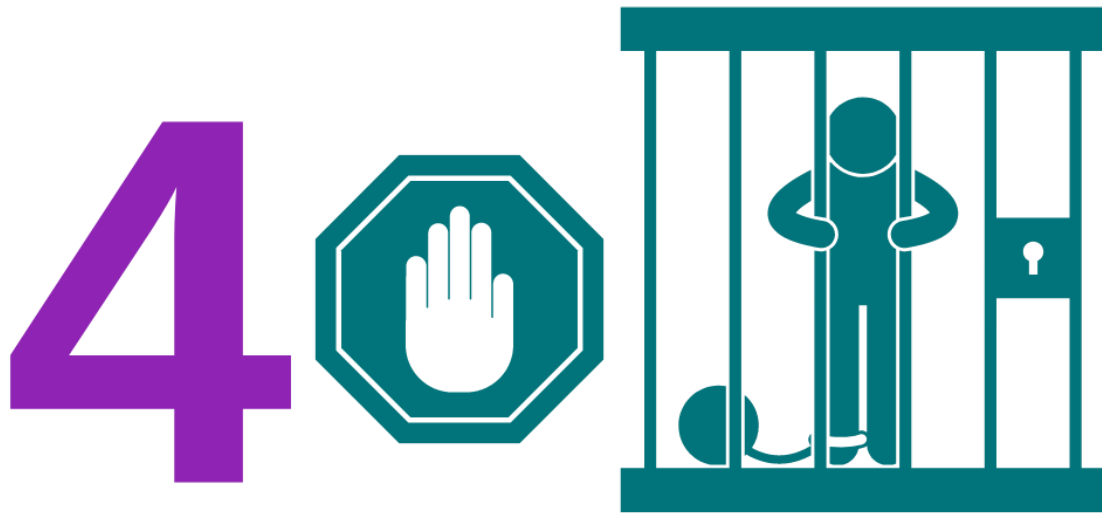
Working with existing networks, **roll out the GLAA qualification**¹, promoting uptake in high risk areas.

Support compliant business to show leadership in **developing self-regulatory and voluntary industry led schemes focusing on high risk sectors**, building sustainable prevention approaches, including a standard approach to the content of prevention training by stakeholders.

Work more closely with Employment Agency Standards (EAS) and National Minimum Wage (NMW) on shared messaging and enhanced joint events to stakeholders and the public through quality digital platforms to enable strong messaging on labour exploitation activities and awareness raising.

Review and evaluate key GLAA initiatives on industry engagement, use of sanctions and powers to identify success models and high impact activities on victim identification, awareness raising and reporting. Build on the information to develop best practice tools and models to increase outcomes for victims, behaviour changes and value for money.

¹ GLAA will work in partnership with the Skills and Education Group to roll out the Level 1 Award in 'Workers' Rights and Preventing Labour Exploitation' across England and Wales



Disrupt and deter criminal activity within the labour market

We are specialists in the investigation of labour exploitation. We will pursue criminal exploitation of workers and maximise the effectiveness of GLAA led enforcement investigations, whilst maintaining our work in partnership with other enforcement bodies

Success by 2023 will be:

Improved quality investigation submissions to prosecuting authorities to support the increased speed and success of prosecutions and the speed of charging decisions.

Effective and proportionate sentencing results from GLAA prosecutions for wider offences in England and Wales.

Delivering a common enforcement approach throughout the UK, to investigate forced labour offences.

Have improved compliance in the labour market through the appropriate and proportionate use of alternative sanctions.

Targeted enforcement that has disrupted the finance and other enablers of criminal exploitation, utilising financial investigation powers and other methods to increase the risk to offenders and reduce their profits.

What we will do:

Pursue relentlessly those who exploit workers using the range of powers, and orders² including financial investigation powers available to us. Keeping the use of those powers under review and evaluating their relative impact and outcome.

Ensure a thorough **understanding by prosecutors the impact of exploitation on workers** in cases presented, to secure proportionate and effective decisions.

Direct enforcement activity to maximise outcomes and protection for vulnerable workers using intelligence assessments of high-risk activity, and hot spots geographically.

Maintain and **expand the effectiveness and proportionate use of existing sanctions** and develop options for improving the suite of enforcement and regulatory powers available.

Continue to **work with the devolved authorities to apply a consistent approach** across the different UK legal jurisdictions.

Develop an effective methodology with the NCA to **capture the impact of GLAA disruption activity** where a formal sanction is not appropriate.

Review the GLAA enforcement approach, and that of key partners, to examine opportunities **to enhance multi-agency investigation and develop a prototype for a SEB operational model**, focused on the right powers and right sanctions in the right situations.

² Labour Market Enforcement Orders under sections 18 and 20 of the Immigration Act 2016, and Slavery and Trafficking Prevention Orders (sections 14, 15) and Slavery and Trafficking Risk Orders (section 23) OF THE Modern Slavery Act 2015



Develop our people and culture in line with the Authority's values, ensuring a diverse, resilient, respected and adaptable organisation

Our intention is to enhance the skills and capabilities of our leaders, unlock the talent of all GLAA colleagues and empower them to progress their own development

Success by 2023 will be:

Being recognised as an employer of choice that invests in the development of its people and recognises and grows the talent of individuals.

For all GLAA colleagues to embed the Values in everything they do creating an inclusive and more collaborative culture which is recognised positively by outside organisations and individuals.

Continuously striving to enhance employee engagement throughout the organisation, ensuring that voices are heard and representative from across the GLAA. Providing a healthy working environment where our people are assisted to achieve their potential.

A performance related payment framework that recognises individual performance

Delivering a step-change in achieving and valuing a more diverse and inclusive workforce, ensuring these aims are reflected in all GLAA policies, procedures and recruitment.

The implementation of succession planning that actively manages talent for contingency and resilience, across the whole of the GLAA.

All colleagues having the ability to maintain a healthy work life balance, and for GLAA to be a flexible and supportive employer.

What we will do:

Develop a phased awareness programme, shaped by GLAA colleagues, which supports them in ensuring that **everything we do reflects GLAA Values**.

Develop a safe and conscientious culture of awareness and action to encourage a workplace where **mental wellbeing is promoted and supported and equality, diversity and inclusion are central to all policies and practices**.

Implement and drive a culture of **Value focussed, effective performance** where performance conversations are normalised, talent is grown within the GLAA and there is a commitment to learning and development.

Linked to the performance process we will embed an **open and transparent performance related payment framework** to recognise and acknowledge individual performance.

Benchmark key policies, and terms and conditions, against other enforcement bodies to provide a **target business model** for future harmonisation, and **preparation for the creation of a SEB**.

Our Strategic Objectives



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

As a public body we have a responsibility to deliver a high quality, effective service, which demonstrates value for money. We will be bold and ambitious in our aims to protect vulnerable workers, whilst operating within a sound financial framework

Success by 2023 will be:

The Board has full confidence that the GLAA has a culture of continual improvement and realignment of resources to new threats and opportunities, in line with proactive risk management.

The GLAA can demonstrate the costs of all its activities and outcomes and show that it has improved its efficiency and effectiveness and can respond flexibly to budget changes.

Delivery of appropriate technology to support operational and organisational objectives and efficiency and effectiveness of the organisation.

Operational and wider management responsibilities are aligned, including finance, risk and performance management with the leadership team assessing itself as to how effectively it is working.

The GLAA receives at least moderate assurance from independent review of its governance by National Audit Office.

Production of our Annual Report and Accounts in a timely manner that clearly demonstrates our use of taxpayer's money against delivery of our business plan objectives overseen by the Board.

What we will do:

Build on the current risk management processes to **develop our maturity around our response to risks**. This includes delivering a framework to foster a decision-making process based on risk, cost and performance.

Effectively managing resources through the risk and performance process, ensuring demand management controls remain sufficient in delivering an effective service which demonstrates value for money.

Develop an assurance model defined in the governance strategy in collaboration with Government Internal Audit Agency (GIAA), ensuring all colleagues across the organisation understand their role in governance and how to contribute to the effective and efficient running of the organisation.

Cost the range of the GLAA's activities and outcomes so that the **GLAA can ensure it uses its resources efficiently and effectively** and to support building a **business case for powers and resources required for a SEB**.

Prepare plans for a range of funding scenarios for 2022-23 and beyond and how this will impact performance against the strategic plan.

Put in place **appropriate governance structures and processes which have the confidence of key stakeholders**.

Part 2: Business Plan 2021-2022

Delivery of our objectives during 2021-22

This section sets out what we plan to deliver in 2021-22 to enhance the role of the GLAA, its effectiveness, and the protection for workers.

Objective 1: Identify and support victims of labour exploitation

Our mission is to protect vulnerable workers from being exploited. We aim to enhance our capability around prioritising victims and be compliant with the Victims' Charter requirements.

Key Deliverables

A written review of reporting routes of victims, public and industry to ensure workers and businesses can access GLAA support and the demand can be effectively managed.

Using strategic and tactical analysis develop a plan to look proactively for communities vulnerable to labour exploitation and ways that victims are abused and exploited. Have mechanisms to capture, record and evaluate outcomes for victims through GLAA interactions.

Building on intelligence and academic research, fully understand the impact of COVID-19 restrictions and transitioning beyond restrictions on vulnerable workers to inform operational practices.

Where NRM is not suitable ensure victim needs are met through GLAA work or work with partners and develop stronger links with NGOs to ensure victims have appropriate support. Build partnerships with employers to support stable employment for workers e.g. bright futures. Evaluation of the effectiveness of our engagement initiatives in increasing awareness of labour exploitation and victim identification, including the impact of Op TACIT³.

Comprehensive quality updates on the work of the GLAA through various media platforms, promoting successful cases through engagement initiatives to demonstrate the positive impacts of the GLAA. Deliver messaging to clarify how workers can get support ensuring there is common language on key terms such as 'victim' and 'labour exploitation'

Training for partners to give a rounder picture on the work of the GLAA and how it supports workers and victims.

³ Op TACIT is a GLAA led taskforce created to respond to increasing levels of allegations in the textile industry in Leicester.

Objective 2: Have a fair, robust and customer responsive regulatory regime that prevents labour exploitation and drives compliance in the sector

We are a proven, credible regulator with a high reputation amongst licensed labour providers. Our aim is to shift to more proactive regulation, investing more in compliance and ensuring that GLAA Licensing delivers all aspects of this objective.

Key Deliverables

A new compliance strategy which focuses on improving our use of resources in compliance work to meet obligations in a timely manner.

Proactive initiatives to raise awareness of labour abuse and modern slavery in the regulated sector and to liaise with licence holders across the UK to ensure that licences are renewed on time.

A new process to enable early identification of non-compliance in the sector to trigger potential compliance response activity.

Labour User/Labour Provider (LULP) and Worker/NGO (Non-Government Organisation) group meetings which are more accessible and inclusive including using digital platforms and assist consultation.

Measurable increase in compliance within the Poultry industry (through collaborative working)

A review of how licensing operates in the shellfish sector.

Building on the regulatory framework, support GLAA Prevention team in the identification of sectors that could be influenced towards compliance without statutory regulation.

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

We are the enemy of illegitimate working practices, not compliant businesses. Working in partnership is critical to achieving our aims. We intend to expand the GLAA's outreach to engage with a larger number and more diverse range of stakeholders.

Key Deliverables

A prevention plan to mainstream prevention activity within the GLAA, supporting business to embed prevention into their core policies and practices.

Accessible trend analysis on high risk and emerging sectors, providing intelligence gaps and using digital platforms and quality digital events to share trend data and resources with stakeholders and enable engagement with identified key communities, Small and Medium Enterprises (SME) and SME trade associations.

Engagement with stakeholders to identify their issues/risks/barriers which interfere with preventing labour exploitation and use this information to help develop content for GLAA event themes.

Themed/focused digital events with EAS, NMW and the Advisory Conciliation and Arbitration Service (ACAS) used to capture impacts of joint working with the GLAA on how business have changed in their practices and procedures to reduce risks of exploitation for workers.

Development of a library of these business change case studies and sharing with business to demonstrate the impact of working with the GLAA on worker welfare.

Roll out the GLAA qualification, monitor and report who in which sector has undergone training with a view to understanding the impact of this pilot.

Prevention initiatives within regional areas in line with the GLAA prevention strategy, such as delivering training and awareness raising sessions, engaging with workers and business regarding spotting the signs and raising awareness of worker rights.

A report to the GLAA Board on the evaluation of the effectiveness and impact of prevent initiatives and protocols, supporting industry in taking lead for protocols into the sector.

Objective 4: Disrupt and deter criminal activity within the labour market

We are specialists in the prevention and investigation of labour exploitation. We will work to increase the number of GLAA-led enforcement investigations, whilst maintaining our work in partnership.

Key Deliverables

An annual strategic assessment of the nature and scale of labour exploitation to inform future planning and contribute to the activities of key partners, including the Director of Labour Market Enforcement's strategy.

A paper to the Board on the evaluation of the effectiveness of the GLAA's current range of powers, orders and sanctions to prevent labour exploitation, such as the wider PACE and Proceeds of Crime Act powers currently available, and review investigative outcomes, enabling the development of a consistent enforcement approach throughout the UK.

Working with the National Crime Agency (NCA) use the Agency and Partner Management Information System (APMIS) to develop, capture and report performance measures on GLAA disruption activity.

Rebuilt and embedded financial intelligence resources within the investigation capability to improve the operational capability of the GLAA operational function.

Development of a lessons learnt document for Op TACIT to inform partnership working and collaborative disruption tactics.

Provide appropriate information and input for magistrates and the judiciary to give a rounder picture on the work of the GLAA and how it supports workers and victims.

Objective 5: Develop our people and culture in line with the authority's values, ensuring a diverse, resilient and adaptable organisation

Our people are our greatest asset and our intention is to enhance the skills and capabilities of our leaders, unlock the talent of all GLAA colleagues and empower them to progress their own development.

Key Deliverables

Talent management and succession planning strategy to inform workforce planning.

Facilitation of cross department project work to promote development and assist where functions have lower capacity or projects have been identified to support the aims of GLAA.

An effective performance development review (PDR) for everyone, with a focus on normalising performance conversations whether task or behaviour based, ensuring everyone understands their responsibility to live the GLAA's values.

Enhancing a one team approach linking closely to PDR through risk and performance to build resilient workforce and consciously getting people engaged and working more closely with other teams and functions. Everyone has a meaningful performance development plan (PDP) that is reviewed every 3 months to ensure all appropriate development and training is provided.

A robust, open embedded and transparent bonus scheme linked to PDR to recognise and acknowledge individual performance and develop a reward and recognition scheme in consultation with colleagues.

A people plan to include an action plan for Equality, Diversity & Inclusion, and rollout of a wider training plan on Equality & Diversity for leadership and wider GLAA. Promoting greater diversity through recruitment practices.

Analysis of the outcomes of all people processes for diversity monitoring and exploration of any disproportionate impacts,

An ongoing timely and cyclical review of HR policies.

Significant enhancement of contingent of Mental Health first aiders and evaluation of effectiveness through contacts developing more outcome and impact measures to report on.

Objective 6: Provide efficient and effective service, sound governance, robust risk management and value for money

As a public body we have a responsibility to deliver a high quality, effective service, which demonstrates value for money. We will be bold and ambitious in our aims to protect vulnerable workers, whilst operating within a sound financial framework.

Key Deliverables

Systems and processes to deliver the intelligence led activity as efficiently and effectively as is possible within the resource constraints and workload and improved working practices for the target field operation model.

Embedded performance, risk and cost management as one decision making process through all levels of assurance to improve our understanding and visibility efficiencies of resources and costs to support a sustainable budget by March 2022.

Increasingly mature risk management within the GLAA and a separate IT risk register, to maintain focus on key risks, supporting the Board in effective oversight and management of GLAA risk.

A governance action plan to address assurance processes, including the development of an assurance map and scheme of delegation for all teams in a staggered approach. Redefine the governance meetings and attendance to support the three lines of defence model, leading to an improvement in internal audit scores, to at least moderate.

The first draft of the Annual Report and Accounts completed before July 2021 and interim business plan assessments throughout the year to support this process. Alignment of all strategic processes and interim reviews of the business plan at relevant meetings.

An IT strategy with core GLAA IT systems to be integrated to support a more efficient workflow in the organisation. Building on this, an efficiencies road map of key processes to be streamlined.

Part 3: Performance Measures 2021-2022

Measuring our impact

Against each of the six strategic objectives and in support of the performance framework, we will measure our success against the business plan through the following six key performance questions:

Performance measures for 2021-22

In addition to the key deliverables set out against each objective in the sections above, this table describes the performance measures that will be used to track progress against each of the six strategic objectives during the year.

Objective 1: The GLAA's response to the identified threats of labour exploitation and modern slavery is effective and identifies and supports victims

Measured by:

1. 10% increase over 2020/21 outturn on victims identified
2. 50% of victims who have received support

Objective 2: The GLAA has demonstrated its ability to provide a customer responsive service and work with businesses, labour users and providers to drive compliance through the use of its regulatory regime

Measured by:

1. An average of 65 working days from tasking to licence decision for completion of AI's
2. An average of 155 working days from tasking to licence decision for completion of CI's
3. An average of 15 working days for licence decision times
4. % of licence with GLAA interventions (to be baselined in 21/22)

Objective 3: The GLAA has an effective approach to working with partners to tackle labour exploitation and modern slavery

Measured by:

1. Overall engagement rate increased from 2020/21
2. 20 GLAA Led events completed
3. 65% Respondents indicating working with the GLAA has influenced their businesses
4. 65% Respondents indicating working with the GLAA has influenced them promoting rights
5. 50% Qualifications granted high risk sector

Objective 4: The GLAA has been effective in leading disruptive activity and utilising the appropriate tools.

Measured by:

- 1: 10% increase on 202/21 outturn for all cases led by the GLAA
- 2: 10% increase on 2020/21 outturn for all cases resulting in an outcome
- 3: 20% increase on 2020/21 outturn for all GLAA led cases being referred to CPS

Objective 5: The GLAA has developed a value driven and diverse organisation that is resilient and adaptable

Measured by:

1. 95% of GLAA employees with a completed PDR
2. 95% of GLAA employees with a completed PDP
3. 70% of GLAA employees reporting diversity data
4. Absence rate below public sector average
5. Employee turnover rate below public sector average
5. 75% Employee satisfaction

Objective 6: The GLAA has ensured robust governance and effective use of its budget to deliver its services

Measured by:

1. Positive change in risk maturity score
2. NAO score of at least moderate
3. 95% of BP objectives in progress and completed
4. Net Expenditure variance from forecast