



Gangmasters &
Labour Abuse Authority

BUSINESS PLAN

2022/23

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Our priorities:

1. Enhance our understanding of labour exploitation to better inform and prioritise operational activity
2. Deliver an effective regulatory scheme that drives business compliance in the regulated sector and supports good practice
3. Support our people to thrive in a positive values-led culture, with a focus on inclusion and wellbeing
4. Align our priorities with our capacity, resources and budget

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FOREWORD



This is the GLAA's first business plan since I became Board Chair and I continue to be hugely impressed with the dedication and work of the whole team and congratulate them on their successes over the past 12 months.

We have taken a long, hard look at our strengths, performance and opportunities to improve our work protecting vulnerable and exploited workers. There are significant challenges compounded by a difficult financial context demanding in-year savings of at least 6%. The GLAA is small but has a huge remit and high expectations.

So, we must prioritise.

It is vital we consolidate and strengthen as a regulator, driving business compliance in the regulated sectors, ensuring workers are treated fairly and decently. We must deliver our new compliance strategy, which will need to be properly resourced. To ensure our limited resources are directed towards need, it is vital we have an in-depth understanding of the threats faced by vulnerable workers so we can protect those at greatest risk of exploitation. This in turn needs to inform how we organise

our operations and deliver our prevention strategy, all of which necessitates working closely with a rich mix of partners. Success will mean we have a significant impact on labour abuse and exploitation.

This is our focus for the next 12 months. Difficult decisions will need to be made but we are clear about what we need to do and can look to the future with confidence.

Julia Mulligan
Chair

FOREWORD



This business plan sets out the GLAA's intent over the next twelve months as we continue to combat the scourge of exploiting people for their labour. It is now five years since the Gangmasters and Labour Abuse Authority was formed, giving us tougher powers to tackle slavery and forced and compulsory labour. In that time, we have seen our licensing scheme grow, built strong partnerships across the public, private and third sectors, and successfully disrupted and prevented unscrupulous individuals from exploiting others.

All these have the potential to create the economic climate in which exploitation can thrive. This makes it imperative the GLAA operates as effectively as possible while building a coalition against exploitation with partners across business, law enforcement, government and charitable organisations. It is that partnership approach which defines our DNA and will ultimately play the biggest role in tackling labour exploitation.

Elysia McCaffrey
CEO

EXECUTIVE SUMMARY



This is the third year of our Strategic Plan 2020-23 and outlines our priorities for the next financial year.

The GLAA faces substantial funding and resourcing challenges but we remain committed to tackling and preventing labour exploitation, through licensing, enforcement, and prevention activities.

Our 2020-23 strategic goals

1. Identify and support victims of labour exploitation
2. Maintain a credible licensing scheme, creating a level playing field, and promoting compliant business growth
3. Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation



4. Disrupt and deter criminal activity within the labour market
5. Develop our people and culture in line with the authority's values, ensuring a diverse, resilient, and change-ready organisation
6. Provide efficient and effective services, sound governance, robust risk management and value for money



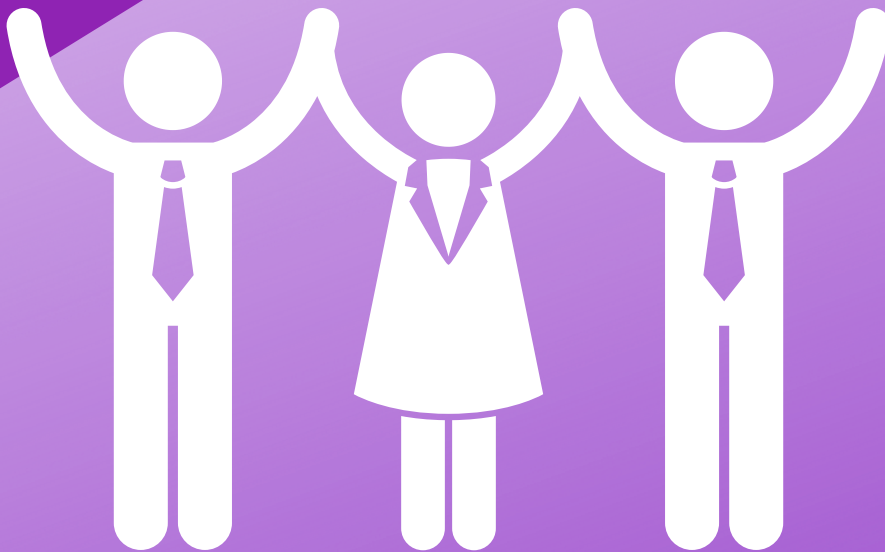
EXECUTIVE SUMMARY



Our plan marks a significant shift from the previous two years reflecting new leadership direction and taking into account the challenges ahead. To meet these goals, we need to operate as efficiently and effectively as possible.

We will focus on:

- Our operational capability, delivering the best possible service
- Developing the culture of the GLAA
- Ensuring the whole organisation is unified to achieve clear priorities.



We are also aware of operating within our constraints, prioritising our resources and ensuring we are prepared for the future

FUTURE



OUR PRIORITIES 2022/23



Enhance our understanding of labour exploitation to better inform and prioritise operational activity

Deliver an effective regulatory scheme that drives business compliance in the regulated sector and supports good practice



Support our people to thrive in a positive Values led culture, with a focus on inclusion and wellbeing

Align our priorities with our capacity, resources and budget



**Our priorities are defined
by our vision and mission**

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**

Our mission



WHO WE ARE

The GLAA is a Non-Departmental Public Body (NDPB), sponsored by the Home Office that exists to protect vulnerable and exploited workers

Our approach to protecting vulnerable and exploited workers is underpinned by legislation.

We regulate our licensed sectors, which account for around 500,000 workers and act against labour abuse in the wider labour market (in England and Wales), which consists of approximately 30 million people



We are an organisation of 119 people - 76% are operational and undertake regulation, investigation and intelligence activities.

Our Head Office is in Nottingham while most of our operational colleagues are located in four syndicates across the UK

WHAT WE DO

The GLAA is a regulatory, law enforcement and compliance body charged with preventing, detecting, and tackling labour exploitation across the UK

We were established through the Gangmasters (Licensing) Act 2004 and discharge our responsibilities under the Modern Slavery Act 2015 in England and Wales. Although our role to regulate certain high-risk sectors is consistent across the UK, our legislative powers on modern slavery and wider labour abuses vary in Northern Ireland and Scotland

Supporting this work are our vital and valued partnerships with various organisations across the UK, without whose collaboration we could not achieve our wider aims



We regulate businesses providing workers to the fresh produce supply chain and horticulture industry, to ensure they meet employment standards required by law. A labour provider must have a GLAA licence to work in the regulated sectors. It is a criminal offence to supply workers without one or use an unlicensed labour provider

We undertake investigations surrounding labour exploitation and labour market offences. GLAA Officers have separate powers enshrined in UK law to either conduct compliance or criminal investigations from which we may undertake enforcement action. We are also acutely conscious of our responsibility to protect victims uncovered through our actions

We engage and work with a broad range of stakeholders at local, national and international level. Prevention is the cornerstone of the GLAA and we will use our collective capabilities and resources more effectively to support a wider prevention and early intervention agenda

OUR VALUES

Our values guide our work both internally and in all interactions with external organisations and individuals



Integrity
We are honest, trustworthy and responsible

Respect
We are a friendly and inclusive team



Professionalism
We work productively with passion and pride



Commitment
We are engaged with the aims of the GLAA



Teamwork
We work in collaboration to achieve goals



BUDGET



The Home Office allocated just over £7.3m (gross cash resource expenditure) to support the GLAA's operational activities

The organisation generates income of £1.2m predominately from fees for licensing, so receives £6.1m of taxpayer funding to support its activities. It also receives capital funding which varies each year and starts 2022-23 with an allocation of £500,000.

It is recognised that there is considerable financial pressure across the public sector and GLAA resource allocation is unchanged from 2022.



The GLAA's funding has reduced in 'real terms' over recent years and GLAA starts 2022-23 with a resource budget deficit of £500,000. This deficit was created by a range of cost pressures over recent years, such as pension increases, pay awards, inflation on contracts, increase in office accommodation recharges and ICT recharges.

BUDGET



This equates to around 6% deficit, which the GLAA will need to address through savings, increased income and efficiencies. The majority of GLAA spend is pay-related and savings will be needed in this area

This is a significant challenge on our ability to deliver against our strategic plan. GLAA started the financial year with a budget to fund 124 posts (128 established posts and 4 expected vacancies or a 3% vacancy factor). To manage the £500,000 deficit, efficiencies will be needed. We may need to review staff volumes, seek non-pay savings and increase income. It also creates challenge for how GLAA deals with the cost associated with change, new activity or to support capital projects which may add to in year financial pressures. It is expected the reduction in resources will result in GLAA increasing its risk appetite and the level of risk it carries



RISK



We will not seek to intervene in all situations but instead prioritise intelligence-led activity in terms of risk, cost of mitigation and perceived benefits in a consistent and transparent way by choosing the most appropriate course of action in each case. This approach is based on professional judgement.

SINGLE ENFORCEMENT BODY

The Government has reaffirmed its commitment to the creation of a Single Enforcement Body and the GLAA supports this, believing it should:

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



INFLUENCE



The GLAA recognises creating a SEB will take time and require appropriate legislation. A single body will influence priorities and activities as we move towards its implementation and necessitate closer coordination with Employment Agency Standards Inspectorate (EAS) and HMRC'S National Minimum Wage team (NMW) - the other candidate bodies

The GLAA is closely engaged in discussions on the practical, logistical, and legislative requirements the body will require and this engagement will increasingly focus on aligning approaches and developments in preparation for a transition - while maintaining our operational response and commitment to worker protection




As work continues to provide clarity on the status of the SEB, the GLAA will continue to be mindful to ensure investments and other organisational decisions are 'future proofed' to provide benefits in the medium-long term, with consideration of their potential longer-term application.

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

Our 2022/23 objectives

1. Enhance our understanding of labour exploitation to better inform and prioritise operational activity



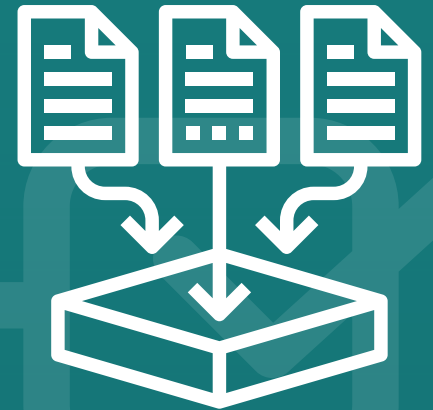
The GLAA is intent on improving and developing our intelligence capability. This is central to all our work, particularly protecting vulnerable and exploited workers

- This year, we will be more intelligence-led to better prioritise investigations, inspections, partnership working and prevention activities.
- Through prioritising our activity, we aim to have an increased positive impact as a result of our intervention.
- We will continually monitor this work by measuring the outcomes of operational activity

KEY DELIVERABLES



- Work with key referral agencies to improve the quality of intelligence we receive
- Work with partners to identify intelligence gaps and areas of vulnerability
- Improve our intelligence analysis to identify and target trends, hotspots and those who perpetrate and facilitate labour exploitation



- Build an authoritative threat assessment on labour exploitation in the UK by the end of the financial year to identify vulnerable employment sectors and support strategic planning
- Develop and embed a comprehensive control strategy

KEY DELIVERABLES



- Develop robust and consistent strategic and tactical tasking and co-ordination processes
- Improve our website and communications and engagement activity to target information, advice and guidance to high-risk groups working or arriving to work in the UK
- Continue to build constructive relationships across the public, private and third sectors to influence change, advance knowledge and promote awareness around the issue of labour exploitation.

Progress will be measured against



- Increase the proportion of operational outcomes by 10%
- 30% of operational activity results in a disruption outcome
- 75% of stakeholders surveyed agree that GLAA has influenced the promotion of worker rights.

2. Deliver an effective regulatory scheme that drives business compliance in the regulated sector and supports good practice

The GLAA regulates businesses that provide workers to the shellfish, agriculture, horticulture, food packaging and processing industries. Labour providers operating within these sectors are legally obligated to have a GLAA licence.

It is a criminal offence to supply workers without a licence or use an unlicensed labour provider. Labour providers are assessed through inspections against the GLAA Licensing Standards, ensuring they meet the relevant legal employment standards.

In July 2021, we published our Compliance Strategy following consultation with stakeholders.

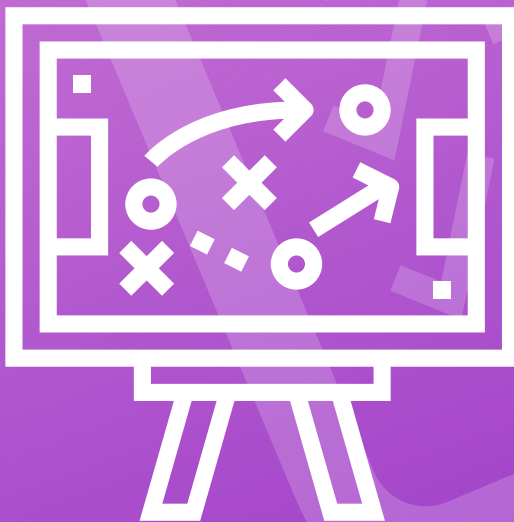
This strategy outlines a change of approach to how we regulate businesses in the licenced sectors.

In this financial year, the delivery of the compliance strategy will be a key focus for the GLAA in this business year



Specifically, the strategy commits us to:

- increase the volume of compliance inspections
- take a risk-based approach to inspections
- ensure we deploy our resources to the greatest areas of risk and carry out application inspections virtually to improve and speed up the licence application process.



KEY DELIVERABLES



- Increase the proportion of businesses in the regulated sector that are inspected
- Focus our resources to undertake compliance inspections of regulated business that are considered high-risk
- Carry out the majority of Application Inspections virtually
- Work closely with relevant partners to ensure the Seasonal Workers Pilot builds on its existing approach of incorporating prevention of exploitation within its programme
- Enhance our engagement with our regulated sector through events and ongoing communication activities

Progress will be measured against



- Increase the proportion of businesses inspected in the regulated sector
- 90% of Application Inspections are conducted virtually

3. Support our people to thrive in a positive values-led culture, with a focus on inclusion and wellbeing

As a small organisation the GLAA has experienced significant change in recent years.

Our priority now is to foster a culture change to build a healthy, safe, and inclusive working environment in which all colleagues feel supported and valued.

We will invite colleagues' views on how we are performing against our priorities through an annual People Survey

We want our people appropriately trained and equipped to excel in their roles.

We will do this through continuous engagement with individuals and line management, supported by the Performance Development Review (PDR) and Personal Development Plan (PDP) framework

KEY DELIVERABLES



- Embed regular one-to-ones between every employee and line manager, which consider wellbeing and work-life balance
- Invest in our colleagues' ongoing learning and career development
- Provide all colleagues with a positive induction and probation period experience



- Colleagues are empowered and supported by a visible Leadership Team whose behaviours demonstrate GLAA values and actively recognise colleagues' achievements
- All colleagues are responsible for consistently demonstrating our values in all their interactions



- Proactively demonstrate our commitment to diversity and inclusion across the GLAA
- Focus on ongoing and meaningful engagement with colleagues across the GLAA



Progress will be measured against



- 75% of colleagues report overall satisfaction through the annual People Survey
- Sickness absence to be under public sector average
- Turnover to be under public sector average

4. Align our priorities with our capacity, resources and budget

The GLAA is facing a real cut in funding for the next financial year, along with cost pressures, resulting in a budget deficit of approximately £500,000 or between 6-7% of the total

This presents us with both a challenge and opportunity to prioritise operational activities, so we can maximise the effectiveness of our resources in protecting vulnerable and exploited workers.

We are clear that we must identify opportunities to streamline processes and increase efficiencies, which will also help position us for the future.

KEY DELIVERABLES



Progress will be measured against



Deliver the service within 2% of the budget

- Develop our spending review 2023/24 case to demonstrate what we will deliver and stop delivering to meet our budget
- Secure a sustainable financial future by developing an implementation plan that considers a review of our income streams and improves efficiency
- Review our target operating model and make recommendations to the Board for change
- Carry out lessons learnt on operational activity and implement recommendations for continuous improvement
- Identify IT improvements to improve efficiency, effectiveness and productivity
- Support the organisation through the delivery of a robust governance framework



MEASURING OUR IMPACT

Achievement of the business plan is the collective responsibility of the GLAA Leadership Team, consisting of the Chief Executive, Chief Operating Officer (COO) and Heads of eight functional areas.

Performance measurement, including internal key performance indicators, will be continuously monitored and reported quarterly at Board meetings.

In addition, the Home Office Sponsoring Unit will hold us accountable of our performance against this business plan

OBJECTIVE

MEASURE

BASELINE

TARGET

1

Increase the proportion of operational outcomes by 10%.*

46.4%

56%

30% of operational activity to be moderated as having a positive disruption outcome.*

18.9%

30%

75% of stakeholders surveyed agree that GLAA has influenced the promotion of worker rights

73.7%

75%

2

Increase the proportion of businesses inspected in the regulated sector

19%

20%

90% of Application Inspections are conducted virtually

N/A

90%



MEASURING OUR IMPACT

OBJECTIVE

MEASURE

BASELINE

TARGET

3

75% of colleagues report overall satisfaction through the annual People Survey

71%

75%

Sickness absence to be under public sector average

3.09%

Under
2.8%

Turnover to be under public sector average

16.6%

Under
15.8%

4

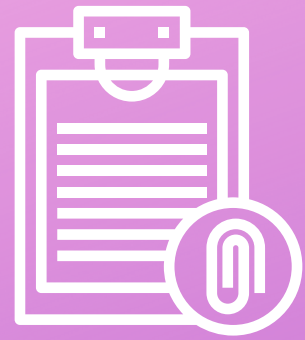
Deliver the service within 2% of the budget

4.59%

2%

Forecast
(Overspend)

APPENDIX 1



Operational outcomes

When measuring operational outcomes, the GLAA includes both enforcement actions and regulatory interventions, which may prevent potential labour abuse or prosecute those who commit labour exploitation. We also include outcomes for any workers and victims identified through our operational activity

Enforcement Actions

- Prosecutions
- Warnings and Enforcement Notices
- Labour Market Enforcement Undertaking (LMEU) and Labour Market Enforcement Order (LMEO)
- Slavery and Trafficking Risk Order (STRO) and Slavery and Trafficking Prevention Order (STPO)
- Recovery of assets through the use of Proceeds of Crime Act 2002
- Removal of an offender from the UK

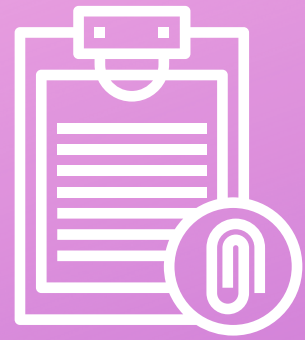
Worker/Victim outcomes

- Recovery of money for workers or victims as a result of our intervention
- Referral into the National Referral Mechanism (including Duty to Notify)
- Referral into other safeguarding mechanism

Regulatory Interventions

- Breaches of Licensing Standards rectified at Inspection
- Tier 1 interventions

APPENDIX 2



Disruption outcomes

When measuring a disruption outcome, the GLAA will consider activity that has been shown to have a disruptive effect on exploitative behaviour.

Activities considered to have a positive disruption outcome include all operational outcomes outlined above and other activities where the disruptive impact is clear and can be moderated.

For example, this may include some of the following:

- Arrests of individuals
- Refusal of a GLAA licence
- Revocation of licence with/without immediate effect
- Suspension of a licence
- Imposing Additional Licence Conditions (ALC)
- Awareness raising and training