



Gangmasters &
Labour Abuse Authority

GLAA Strategy

2023-26

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Chief Executive Officer



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Chair

Foreword

This is our first strategy since we took up post as Chief Executive Officer and Board Chair of the Gangmasters and Labour Abuse Authority (GLAA). Over the last year, we have had the opportunity to understand the positive effect our work has, and where we need to focus our efforts to further improve our impact.

The GLAA has highly skilled and passionate colleagues who care about and are invested in seeing the best possible outcomes for workers in the UK.

Our organisation was originally set up in 2005 as a regulator. In 2016, we were granted new police-like powers, and since then we have developed and grown our law enforcement work. These powers have now had time to embed and have been used to great effect, helping to hold those who seek to exploit and abuse workers to account. We now know more about offender behaviour, victim journeys and we are more effective at working with our partners, whose knowledge has also increased over this time.

In developing this three-year strategy, we have also listened to feedback from our colleagues and a wide range of stakeholders. We have taken into account how our work can feed into the Home Office Outcome Delivery Plan (ODP). Through this strategy we will directly contribute to two elements within the ODP; having a UK that is safe, fair and prosperous, where people live and work together productively and for decent work and keeping the public safe through tackling labour abuse.

We have reviewed the evidence base that shows the types of demands placed on the GLAA, our work with partners and duties to the Director of Labour Market Enforcement (DLME). This has shown us that we need to reprioritise our efforts on improving and enhancing our work as a regulator, which includes our productivity, our timeliness, and the robustness of our regulation. This work will be supported by our enforcement capability which will focus on the areas where we can make the biggest difference – based on evidence.

As a public body we are under pressure to deliver the best possible service with growing financial pressures. Our biggest priority is to protect workers, and to do this in the best way we must prioritise our work using robust evidence to inform how and where we allocate our limited resources. We are mindful of the GLAA Public Body Review that will take place in 2024 and the opportunities this may bring both in terms of efficiencies and improving our contribution to the government's safeguarding agenda. In the latter part of this strategy, we have created room so that we can respond effectively to any recommendations from the review.

As an organisation, we have extensively reviewed how we are set up, which may lead to changes to our operating model during this strategy cycle. Our colleagues deserve an organisation that is set up in the best possible way to ensure our success. The board and the executive team will be prioritising the wellbeing of our people, developing our diversity and inclusivity, and building a collaborative and supportive culture. We will be strengthening our governance, improving our systems and processes, and making sure that this is the best place that it can be to work.

Improving the lives of workers in the UK means giving our own colleagues a great place to work.

Introduction

The Gangmasters and Labour Abuse Authority (GLAA) has existed in its current form since May 2016. This is our third corporate strategy.

Like many organisations, we have found the past few years to be challenging. Moreover, since our last strategy was developed, we have a new Chief Executive Officer, a new Board Chair, and an almost entirely new board.

This strategy is the result of a re-appraisal of our work, with an increased focus on the things that only we can do, to make sure that we are playing consistently to our strengths and ruthlessly prioritising in the areas where we can have the biggest impact. It builds on our past, but also offers a clear direction for the future.

We will:

- focus on our core business as a regulator

- prioritise activities for which our powers and expertise are best suited

- concentrate our enforcement operations on those who breach our standards or operate illegally

- work collaboratively with others in line with the strategy set by the Director of Labour Market Enforcement (DLME)

- embed prevention into all our work

This strategy requires us to change how we work and organise ourselves to remain true to our mission and to enable us to navigate future change and challenge.

In writing this strategy we have focused our finite resources, provided clarity to internal colleagues and external stakeholders on how we can have the biggest impact and how we intend to use our data more effectively to demonstrate the impact of our work.

A detailed annual business plan will supplement each of the three years this strategy is in place.

Our Mission

Our mission is to stop the exploitation of workers in the UK and to ensure employers treat them fairly.

Who we are

On 5 February 2004, 21 people were drowned picking cockles in Morecambe Bay. They had been trafficked into the country illegally and hired out to gather shellfish by local criminal gangs.

The Gangmasters Licensing Authority was set up in the aftermath of this tragedy to regulate people and companies supplying workers to the food industry, and to prevent anything similar from happening again.

These origins continue to drive our operations today, as we strive to protect vulnerable workers.

In 2016, Parliament expanded our remit and changed our name. We were granted police-like enforcement powers to deal with serious worker exploitation, including modern-day slavery.

As the Gangmasters and Labour Abuse Authority (GLAA), our work has three principal strands:

- we are a regulator,
- we prevent worker abuse,
- we investigate the exploitation of people for their labour.

We routinely work with others and have close partnerships with a wide range of agencies, including the National Minimum Wage Team at His Majesty's Revenue and Customs (HMRC), the Employment Agency Standards Inspectorate (EAS) and UK law enforcement, including the National Crime Agency (NCA).

We are also bound by the work of the Director Labour Market Enforcement (DLME), which sets strategic priorities for labour market enforcement.

We are operationally independent of government as an Arm's Length Body of the Home Office, held to account by a board of independent non-executive directors and Chair. The board sets and oversees the delivery of this strategy, our performance and governance.

The GLAA is led by our Chief Executive Officer and senior leadership team. We have approximately 116 colleagues, working in teams around the UK with a headquarters in Nottingham.



What we do

The GLAA ensures that workers in the UK are treated fairly, properly and are protected from abuse and exploitation.

We have three core functions:



Regulation

We regulate businesses that provide workers to the horticulture and fresh produce industry. Anyone wanting to provide workers to these markets must have a GLAA licence to operate. Our regulated sectors are agriculture, horticulture, shellfish gathering, food and food packaging and processing. It is a criminal offence to supply workers without a GLAA licence or use an unlicensed labour provider throughout the UK. Our regulatory work includes operating a licencing scheme, undertaking inspections to ensure compliance with that scheme, and taking enforcement action where there are breaches.



Prevention

Our prevention work is an important part of our plan/aim to stop worker exploitation in the UK. We currently work with a broad range of stakeholders locally, nationally, and internationally to help prevent workers from being exploited. Partners include other government agencies, but also a network of specialist charities and NGOs. Our prevention activities are diverse. Prevention

is also embedded into our enforcement work as we disrupt criminal activities and intervene in situations where workers may be at risk of abuse.

Our prevention activities extend beyond our regulated sectors, as we work in other high-risk sectors that rely on a temporary, cheap and often migrant workforce.



Enforcement

We investigate allegations of worker abuse under the Modern Slavery Act 2015. GLAA Officers can conduct civil and criminal investigations and take enforcement action, including prosecutions and court orders to disrupt criminal activity. We also support victims who have been abused, in particular by ensuring they can access specialist help from our partners. We do not have modern slavery enforcement powers in Northern Ireland and Scotland, this work remains with the police in those areas, but our regulation scheme operates UK-wide. We have fostered close working relationships with our enforcement partners across the whole of the UK where we are able to jointly visit locations and make the best use of the powers that we collectively have, to disrupt and deter criminal activity.

Our Values

Our values underpin everything we do. They were developed in collaboration with GLAA colleagues and set the culture and behaviours we expect from each other. We expect our people to champion these values both internally and with external stakeholders.

- **Integrity** - We are honest, trustworthy and responsible.

- **Respect** - We are a friendly and inclusive team who openly help each other and understand we are working towards the same goal.

- **Teamwork** - We work in collaboration to achieve common goals efficiently and effectively.

- **Professionalism** - We work productively with passion and pride to achieve the goals of the GLAA.

- **Commitment** - We are engaged with the aims of the GLAA and dedicated to protecting vulnerable workers.

Our Strategic Goals

We have three strategic goals which will focus and direct our work over the coming three years. To measure our progress, we have developed a set of Key Performance Indicators, which will be reviewed every year to drive our performance forward. Our board will oversee our progress, hold us to account for delivery and we will report on our achievements in our Annual Report and Accounts which is laid in Parliament.

Our three strategic goals are:

Goal 1: Be a robust and effective regulator

Regulation is our core business, and we will ensure it is resourced appropriately and operates effectively.

Goal 2: Be known as experts in addressing worker abuse and exploitation

We will use our analytical and intelligence capabilities to influence policy and practice, develop and expand our prevention activities and ensure we can properly direct and prioritise our work.

Goal 3: Be an essential enforcement partner

We will prioritise our enforcement operations through our strategic risk assessment, and work in collaboration with partners to tackle serious worker exploitation and abuse in line with those priorities.

Measuring our Progress

We will develop annual business plans setting out what we will do and how we will do it, moving us closer to achieving our strategy.

For the first time, we have benchmarked our current performance and developed a robust set of key performance indicators (KPIs) to evidence our progress and tell our story over the three years, from implementation in year one, to thriving in year three.

These strategic KPIs will be reviewed each year to ensure they are relevant, accurate and stretching. They will provide our board with the tools they need to hold us to account for the delivery of our strategy. They will be published on our website, which will ensure clarity and transparency for the public, our partners and stakeholders.

Each department will have their own delivery plan and associated KPIs, for which they are held accountable by the new management board. These will feed up into the strategic KPIs, ensuring performance management and accountability runs through the organisation from top to bottom. This will be set out and managed through an accountability framework approved by the board.

We have invested in analytical capability to ensure we can better understand and monitor performance, and this team will work independently of those responsible for delivering services, to improve governance and build checks and balances into the system.



Our Aspirations:

Be a robust and effective regulator

- A reduction in the time it takes to complete regulation activity
 - A greater proportion of licence holders are inspected
 - A greater proportion of serious non-compliance inspections deliver an outcome
-

Be known as experts in addressing worker abuse and exploitation

- A greater proportion of information received leads to actionable intelligence
 - A greater proportion of intelligence informs investigation
 - An improvement in the management and safeguarding of victims
 - A reduction in the control strategy priorities threat levels
-

Be an essential enforcement partner

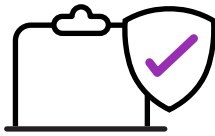
- A greater proportion of investigations result in prosecutions and civil disruption orders
-

Our people and resources

- To proactively and effectively manage the budget by tracking expenditure and driving efficiency savings in line with the strategic financial plans
 - To develop an inclusive, diverse and professional workforce, where employees feel a sense of belonging and are empowered to perform at their best
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Our Strategic Plan



Goal One: Be a robust and effective regulator

Our regulatory scheme is something only we can deliver. It is a vital tool for protecting workers from abuse and exploitation, ensuring businesses meet their obligations and improve their treatment of workers. We undertake inspections on businesses to determine whether a GLAA licence should be granted. This strategy demonstrates our commitment to provide an effective and robust regulatory scheme.

How we will do it

We will:

- Deliver a consistent, reliable and quality service
- Set ambitious and realistic target timeframes for licensing decisions and inspections
- Led by intelligence, target organisations which fail to comply with our regulatory scheme and abuse workers

- Increase awareness of our work across the sectors we regulate and support organisations to be compliant
- Use our powers to stop unregulated gangmasters from abusing workers and hold them to account

Success will look like:

1. A reputation as an effective regulator, which stakeholders have confidence in
2. Faster licence decisions in target timelines
3. Increased disruptions through proportionate and expedient investigations that reduce serious non-compliance in the regulated sectors
4. Unlicensed gangmasters are exposed and held to account

Our Aspirations:

- A reduction in the time it takes to complete regulation activity
 - A greater proportion of licence holders are inspected
 - A greater proportion of serious non-compliance inspections deliver an outcome
-



Goal Two: Be known as experts in addressing worker abuse and exploitation

The GLAA is tasked with stopping worker exploitation in the UK and protecting vulnerable people from abuse. Through building our own understanding of current and future threats, we will ensure our own work is maximised and operations are prioritised, as well as share our unique knowledge with partners to further protect workers on a larger scale.

How we will do it

We will:

- Ensure all our work is shaped by the needs of workers, including those most at risk of exploitation
- Invest in and further develop our analytical and intelligence functions
- Embed and co-ordinate prevention in every aspect of our work
- Drive strategic partnerships through a risk-based programme of joint work with businesses, NGOs and others to help protect workers from abuse and exploitation
- Proactively share our knowledge and expertise through quality analytical products, reports and briefs

Success will look like:

1. Using our intelligence and knowledge to proactively educate and protect workers at risk of labour abuse
2. Prevention is embedded in our operational work leading to the identification of early disruption opportunities
3. A key role in influencing and shaping policy and practice with the Office of Labour Market Enforcement (ODLME), key partners and government
4. Relevant actionable intelligence, which leads to disruption of worker exploitation
5. Confidence in our understanding of worker abuse and exploitation, the needs of workers and how this informs our thinking, priorities and work

Our Aspirations:

- A greater proportion of information received leads to actionable intelligence
 - A greater proportion of intelligence informs investigations
 - An improvement in the management and safeguarding of victims
 - A reduction in the control strategy priorities threat levels
-



Goal Three: Be an essential enforcement partner

The GLAA has police-like powers to tackle serious worker exploitation and abuse. The complexity of our work and its overlapping nature with other agencies puts partnership working at the heart of our enforcement activities. The GLAA has a national remit and a relatively small number of operational resources to deliver against that remit. To be an essential partner will ensure our expertise, skills, experience and delegated powers are used effectively to protect exploited workers.

How we will do it

We will:

- Prioritise our activities using a strategic assessment of threat, risk and harm
- Work effectively with partners to disrupt the exploitation of workers in line with our Control Strategy priorities
- Plan, co-ordinate and deploy enforcement operations with partners to pursue people who exploit and abuse workers
- Evaluate the impact of our disruption and enforcement activities and share learning to enhance future impact

Success will look like

1. Effective use of criminal prosecutions and civil disruption orders to tackle worker exploitation and abuse
2. Prioritised and effective work with partners that demonstrably reduces risk and harm to vulnerable and exploited workers
3. An evidence-based culture of continuous improvement and learning that increases the impact of our enforcement activities

Our Aspirations

- A greater proportion of investigations result in prosecutions and civil disruption orders.
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Business Enablers

To achieve our strategic priorities, we must invest in the foundations of our organisation and develop our capabilities in line with our resources and budget. Work to implement this strategy has already begun. We have invested in our IT systems to reduce silo working and encourage collaboration, improve data and information sharing and resources across the organisation. We are redesigning our operating model to ensure we have the best structures to deliver this strategy, resourced appropriately. These are significant pieces of business transformation that will be delivered, embedded and developed over the life of this strategy.

The following enablers cut across the business and are fundamental to achieving our strategic goals.

Improve our governance systems and processes

To ensure we are efficient and effective we must have robust policies and processes in place, clearly understood lines of accountability and appropriate decision-making. We will make sure that all colleagues understand our strategy, are able and willing to fully implement it and that we can measure outcomes and impact. Our Audit, Risk and Assurance Committee will oversee improvements to our governance systems, information and processes ensuring we meet statutory and governmental requirements.

Create a positive and inclusive culture to help our people thrive

We exist to support some of the most vulnerable people in society. To do this, we must look after our own people, support them, develop them, and encourage them to perform at their very best. This requires a supportive and positive culture, where everyone is valued and able to fully commit to their work. We are committed to equality, inclusion and diversity, as well as promoting and modelling behaviours reflective of our values and desired culture. We must take responsibility for the quality and timeliness of our work and be accountable to ourselves and our colleagues for delivery and our own behaviour.

Invest in technology and systems to facilitate our work and manage performance

To ensure our operations are properly informed by reliable and accurate data, we are investing in new intelligence and case management systems. We are also putting in place new processes to ensure accurate and timely management information to help us fully understand our progress, performance and evaluate outcomes. These new systems and ways of working will contribute to the delivery of our strategy over the next three years.

Our Aspirations

- To proactively and effectively manage the budget by tracking expenditure and driving efficiency savings in line with the strategic financial plans
 - To develop an inclusive, diverse and professional workforce, where employees feel a sense of belonging and are empowered to perform at their best
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The Journey

Through the annual business planning cycle that falls out of this strategy, we will review our strategic KPIs to drive continuous improvement, and ensure we have appropriate performance measures to monitor and evidence progress made from one year to the next.

Year One: Implementation

Our current operating model does not support our new strategy, and our ways of working need to be more efficient and effective. We are developing and implementing a new operating model, which will improve the way we work. This focuses on our core capabilities, capacity and how we need to resource our work in line with our strategic priorities and risk assessment. It also describes the organisational culture and the behaviours we need to develop. Alongside this work are improvement projects to strengthen our intelligence and regulatory functions. These projects are aligned with our strategy, have their own action plans with delivery milestones, and will be critical to the successful delivery of year one.

Year Two: Consolidation

The second year of our strategy will focus on embedding the changes made in year one. We will strive to ensure we are prioritising our work effectively, that we have developed a mature strategic risk assessment and that we have in place better data and systems to measure our progress and outcomes. The timeliness of our regulatory decisions will have improved, and we will have evidence demonstrating how intelligence is leading our work and improving outcomes.

Year Three: Thrive

By year three, we expect to be able to show clear evidence of the impact our work has had in delivering our mission. Our new operating model will be fully embedded, and our teams will be aligned behind our strategy and operational priorities resulting in improved performance. As a result, we will expect to be regularly sought to contribute insight, expertise and evidence in developing policy and best practice. We will have developed a more diverse and inclusive workplace culture, more representative of the people we protect and the 'worker voice' will run through our business and service delivery.





Gangmasters & Labour Abuse Authority

More information

Contact us to find out more about our work or to request this plan in an alternative format.

www.gla.gov.uk

Follow us:

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