



Gangmasters &
Labour Abuse Authority

GLAA60/13 Stakeholder Engagement

18 July 2018

Board Paper Reference – GLAA60/13 - Stakeholder Engagement

1. Purpose of the Report

1.1 To update the board on the work of the liaison groups.

2. Recommendation

2.1 The Board is invited to note the minutes at Annex A of the

- NGO Liaison Group meeting held on 9 May 2018
- Labour User/Labour Provider Liaison Group meeting held on 22 May 2018

Report Author: Jennifer Clarke

Senior Responsible Officer: Darryl Dixon

Minutes

Title of meeting	Worker/NGO Liaison Group		
Date	9 May 2018	Time	11:30
Venue	2 Marsham Street		
Chair	Linda Dickens	Secretary	Katie Taylor

Attendees

Linda Dickens (LD) Board Member – Chair
 Katarzyna Zagrodniczek (KZ), East European Advice Centre
 Caroline Robinson (CR), Flex
 Justin Bowden (JB), GMB
 Lucila Granda (LG), Latin American Women’s Rights Service
 Nahir de la Silva (NS), Latin American Women’s Rights Service
 Lidia Estevez-Picon (LE), The Connection of St Martins
 Kate Bell (KB), TUC
 Andrew Wallis (AW), Unseen
 Erena de Cauna (EC), Unite

Roger Bannister (RB), Interim CEO, GLAA
 Margaret Beels (MB), Chair, GLAA
 Darryl Dixon (DDi), GLAA

Apologies

Narmada Thiranagama (NT), Unison
 Diana Holland (DH), Unite
 Matthew Creagh (MC), TUC
 David Dickens (DD), Fisherman’s Mission
 James Tullet (JT), Migrant Help
 Hannah Reed (HR), TUC
 Bridget Henderson (BH), Unite
 Jerry Swain (JS), Unite
 David Gill (DG), USDAW

1.	Welcome and Introductions Linda Dickens welcomed attendees from the Worker/NGO Liaison Group. Attendees introduced themselves.
2.	Apologies Noted as above.
3.	Minutes of the previous meeting: The minutes of the previous meeting were agreed as an accurate record.

4.	<p>Actions arising from the previous meeting held 1 November 2017</p> <ul style="list-style-type: none">a. CR questioned the action relating to independent research commissioned from Sheffield University to evaluate the effectiveness of licensing. DDi commented that this had been overtaken by events and had not been commissioned. Evaluation of this kind was likely to be subsumed in follow up action to the DLME strategy. CLOSEDb. Summary of the Assessment – information and a graphic were emailed to the Group the previous day (08/09/18), in addition to the meeting’s other papers. CLOSEDc. All actions were agreed as CLOSED with ‘Terms of Reference’ being discussed as Agenda item 10.
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5.

CEO Update:

a. RB introduced himself to the Group after commencing in the role on 16 April 2018. He underlined the importance of liaison groups for their open dialogue and exchange of views.

b. CEO Quarterly Report:

RB highlighted the following key points:

- Operation Brewer – a Merseyside operation which garnered media attention.
- The GLAA Staff Seminar (19 and 20 April 2018), which brought together almost 130 GLAA staff from across the country.
- The successful Ministerial visit by Victoria Atkins MP on 27 April 2018, in particular, the ‘at desk’ meetings with departmental GLAA teams.
- Finance/IT/Licensing System – ongoing issues are being focussed on.
- Operation AIDANT 11 (w/c 14/5), GLAA had a lead role in this large-scale operation involving 21 EU countries and 42 forces. Focus is on labour exploitation/modern slavery, victim support and intelligence from law enforcement agencies.

KB queried two issues:

- i) Where would the five per cent efficiency savings fall? MB responded that the budget was in two parts. The £2m of police funding had not been subject to any reduction. The budget that funded the GLAA’s established activities had been cut by five per cent. However much funding GLAA received, it would always have to prioritise. DDi said that we are one year into our new scope and we are better able to use Immigration Act powers. Public accountability prevails.
- ii) Who takes the lead on joint investigations and protocols? RB responded that GLAA activity involves operations where it is both in the lead and operations where other organisations e.g. police are in the lead. MB added that GLAA does not take part in operations lead by Immigration Enforcement.
- iii) EC raised the issue of labour exploitation in Dutch haulage companies using Eastern European drivers and paying just £100 per month. DDi confirmed AIDANT is a Europe-wide operation utilising powers of police and labour inspectorate – the results will be fed back to Europol.

LD suggested these topics might be subjects for future meetings – discussed under agenda item 11 below.

CR asked about engagement with reception centres and NGOs.

ACTION POINT 1: RB to check and report back

c. Performance and Insight Report:

RB confirmed that the new format will be presented at the next meeting to reflect the expanded GLAA powers and subsequent headline reports.

Key factors in this report are:

- 25 per cent in investigative activity with 150 investigations currently open.
- Intelligence shows exploitative activity is most prevalent within the agricultural sector involving British and Romanian men aged 20-30. EC expressed concerns on how nationals are identified and supported. AW wants traceable granularity in the system that frames where the GLAA sits.

	<p>MB stated it would be helpful for Ian Waterfield (IW)/Ian Walker (ISW) to talk through metrics with Group, with particular reference to stakeholders. RB confirmed the new pack will measure outcomes as well as activity with operational indicators of performance. CR said that she would like the new pack still to include detail and would welcome providing input to GLAA on this.</p> <p>AW queried the increase in email as a referral method, which DDi confirmed that the Modern Slavery helpline, which is being separate from the GLAA Confidential Hotline, results in email referrals to GLAA.</p> <p>ACTION POINTS 2 - 5:</p> <ul style="list-style-type: none"> • RB has further information on arrests and conviction rate – will circulate to Group. • IW to answer performance queries at the next meeting. • IW to consider how stakeholders can assist in identifying operational indicators and demonstrate how GLAA is having the desired impact. • RB to examine referral figures from GLAA website and Intelligence Inbox.
6.	<p>Governance:</p> <p>MB said that Home office is responsible for GLAA Board member appointments, including the Chair. There are public competitions running both for the Chair position and to replace two GLAA board members. Both have been subject to delay. In the meantime, MB and the two Board members are to continue in post, as required by the GLAA Regulations.</p> <p>Four GLAA Board appointments (LD, BB, PW and SA) have been extended.</p> <p>Interim CEO, Roger Bannister had been appointed from 16 April. Recruitment for the permanent position would take place in the autumn.</p>
7.	<p>DLME Strategy:</p> <p>Report was issued on the morning of this meeting (9 May 2018). The implications of the Report for GLAA will therefore be an Agenda item for the next Worker/NGO Liaison Group meeting.</p> <p>ACTION POINT 6: Agenda item for next meeting JR</p> <p>The Government will be providing a formal response to the DLME strategy, which was likely to be combined with their response to the public consultations following the Matthew Taylor Report. Both will have relevance to GLAA strategic direction. LD noted that, among other things, Sir David Metcalf had praised GLAA for publicising their activity.</p> <p>Home Office (HO) to draft a response and submit to Ministers by 23 July, owing to the summer recess.</p> <p>ACTION POINT 7: MB wishes to know if the Group members all receive GLAA press releases. If not, to flag this up to JR (ALL)</p>

8.	<p>Consultation on Licensing Standards:</p> <p>This will be launched in the next few days. Due to lack of Parliamentary time, no legislative changes can take place so the consultation is a way of making improvements within the existing rules. GLAA will host the events and will issue details of the meetings.</p> <p>Provisionally the HO had reserved time in January to put through changes in licence fees, but this may be too soon considering the work that will have to be completed on any proposals and the requirement for public consultation.</p>
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9.	<p>Worker Exploitation – round table:</p> <p>LD reported a question asked by a member of GLAA staff at the GLAA Staff Seminar concerning whether Helpline statistics indicated where callers had obtained the Helpline number. This would help ascertain whether the information handed out by Regional Field Intelligence Officers (RFIOs) is having any impact. AW indicated information of this kind was incomplete.</p> <p>ACTION POINT 8: AW to circulate Modern Slavery helpline annual report to the group (will be circulated with minutes).</p> <p>EC noted that the Dutch union FNV had produced material relating to exploitation in the road haulage sector. DDi indicated GLAA had contact with Road Haulage employers but not the Union.</p> <p>ACTION POINT 9: EC to provide information regarding haulage</p> <p>CR noted the Felicity Lawrence article ('How did we let modern slavery become part of our everyday lives' The Guardian, 02/04/18), which flagged statistics from the construction sector.</p> <p>ACTION POINT 10: CR can share report from the Mayor's Office for Policing and Crime (MOPAC) work with GLAA.</p> <p>ACTION POINT 11: KB to send report on exploitative companies.</p> <p>There was discussion around victim support and the NRM. LE expressed a concern that NRM referrals made directly through Salvation Army took longer than those that went via the Police – her concern is that victims will get lost. Suggested that someone talk about the NRM in a future meeting. DDi has figures of how many victims access NRM and these will be in the new P&I pack.</p> <p>NS/LG referenced a report they have seen into domestic work regarding the way nationality versus ethnicity of Latin American people is recorded. As this was quite a detailed point, NS will email DDi directly with her questions.</p> <p>JB noted cases from unlicensed sectors, e.g. waste recycling.</p> <p>There was brief discussion of how GLAA might reach and engage more with trade union constituencies. Information briefings badged by TUC is one possibility. KB expressed TUC willingness to have discussions around this. JB and DDi had been discussing possibility of a 'protocol'.</p> <p>ACTION POINT 12: DDi to consider how we can further open up GLAA/TUC/Union dialogue and useful engagement. DDi/KB to discuss.</p> <p>ACTION POINT 13: DDi and JB to have further discussion about a 'protocol' approach for Unions, comparable to the Supermarket Supply Protocol. DDi to discuss with JB and prepare a short paper.</p>
10.	<p>Approval of Terms of Reference:</p> <p>Approved by the Group</p>

11.	<p>Plan for Future Meetings:</p> <p>A list of potential topics was discussed. The following were selected to focus on initially:</p> <ul style="list-style-type: none"> • Joint investigations • What constitutes 'good' performance/operational indicators • Post-Brexit including EU Migrants/GLAA international engagement • GLAA Threat Assessment (published 8/5) • Particular sectors (e.g. warehousing and logistics; social care) – potentially subjects for joint discussion. • Operation and reform of NRM <p>ACTION POINT 14: LD and GLAA to look at scheduling in conjunction with meeting dates and to identify GLAA staff or others to attend as appropriate.</p>
12.	<p>Joint Stakeholder Meeting:</p> <p>a) Minutes agreed with exception of FLEX (see below).</p> <p>b) Feedback from meeting: Heavy snowfall had adversely affected attendance but it was agreed that the day had been valuable and that the workshops worked well in small groups. A draft list of action points arising from the short feedback presentations from the workshops was circulated. CR said FLEX had different actions from the Women Workers and exploitation workshop than those reported and she would like to re-cast them in a separate report.</p> <p>ACTION POINT 15: FLEX to provide comments on actions.</p> <p>LD said further work was needed within the liaison groups and the GLAA is to identify who would do what as a result of the action points from each workshop with a clear remit of actions, owners and timescales.</p> <p>ACTION POINT 16: RB to look at crossover of workshops</p>
13.	<p>AOB:</p> <p>None declared</p>
14.	<p>Date of next meeting:</p> <p>16 August 2018, 11:30am, 2 Marsham Street</p>

Minutes

Title of meeting	Labour Provider and Labour User Liaison Group Meeting		
Date	22 May 2018	Time	11:00
Venue	GLAA, Nottingham		
Chair	Margaret Beels	Secretary	Katie Taylor
Attendees	<p>LU/LP</p> <p>Estera Amesz (EA), AG Recruitment & Management Doug Amesz (DA), AG Recruitment & Management David Camp (DC), Association of Labour Providers Lorna Bramwell (LB), The Staffing Group Jane Bladon (JB), Staffline Tamara Hall (TH), NFU Kathryn Britton (KB), GS Fresh Sian Thomas (ST), Fresh Produce Consortium David Camp (DC), Association of Labour Providers Prof. Ian Clark (IC), Nottingham Trent University Huw Fearnall-Williams (HFW), Nottingham Trent University John Devine (JD), Response Recruitment Tom Easson (TE), Ringlink Scotland Jonathan Mason (JM), AG Thames Rick Fletcher (RF), Freshtime Joanne Young (JY), GI Group David Thurley (DT), GI Group</p> <p>Margaret Beels (MB), Chair, GLAA Roger Bannister (RB), Interim CEO, GLAA Charlotte Woodliffe (CW), GLAA Nicola Ray (NR), GLAA Frank Hanson (FH), GLAA Ian Waterfield (IW), GLAA Katie Taylor (KT), GLAA</p>		
Apologies	<p>Jon Tugwell (JT), Fyffes Tania Cummins (TC), Acorn People Julie Giles (JG), The Staffing Group Sharon Cross (SC), GS Fresh Andy York (AY), Tulip Graeme Sutton (GS), Jark (Hull) Ltd Kevin McCormick (KM), KHS Philip Campbell (PC), Recruitment and Employment Confederation Stephanie Maurel (SM), Concordia David Seagust (DS), Firstcall Contract Services Sue Johns (SJ), Butters Group</p> <p>Neil Court (NC), GLAA Marshall Evans (ME), GLAA</p>		

Annex A

1.	<p>Welcome and Introductions:</p> <p>Margaret Beels (Chair) welcomed attendees and also welcomed new Interim CEO, Roger Bannister, to the Group. RB introduced himself personally and professionally, saying how his 30 years' service with Leicestershire Police will enable him to prioritise the new GLAA powers to achieve results and engage stakeholders. RB joined the GLAA on 16 April 2018.</p>
2.	<p>Apologies:</p> <p>(See above)</p>
3.	<p>Minutes of the previous meeting:</p> <p>Minutes of the previous meeting, the Joint LP/LU and Worker/NGO Liaison Group meeting held on 28 February 2018 were agreed.</p>
4.	<p>Actions arising from the previous meeting:</p> <ul style="list-style-type: none"> a) Professional Employer Organisations (PEOs): these are still being examined by CW. All attendees are to contact GLAA if an organisation is found to be operating this way. CW will put it out a GLAA Brief once the position is fully clarified. LB noted she had not been approached since the last incident (noted in minutes of 28/2), DC agreed with this too. ONGOING b) Matthew Taylor Review – MB thanked DC for circulating his document. CLOSED c) IW will present a visual representation of Intelligence data, the framework has been built over the past months and will be completed by the end of May 2018. d) Exclusions for third party packaging is now completed. A questionnaire is available from the Licensing Team if an exclusion is being sought. CLOSED e) User research for the new Licensing system project has stalled, however, work is currently ongoing to identify new options. Group will be kept informed. ONGOING

5.	<p>CEO Update:</p> <p>RB outlined the significant increase in the GLAA's work, both operationally and strategically.</p> <p>Operation AIDANT – GLAA had a lead role in this large-scale operation involving 21 EU countries and 42 forces. Its focus was labour exploitation/modern slavery, victim support and intelligence from law enforcement agencies.</p> <p>RB made reference to the first two LMEUs (Labour Market Enforcement Undertaking), one of which was made in Nottinghamshire and two in Scotland.</p> <p>Prevention – the GLAA is very clear on enforcing this as simply arresting perpetrators is not the solution. Prevention, licensing and compliance are interlinked. RB re-iterated this is where we need to focus. The 'contest strategy' strand is comparable to radicalisation and can be read across into labour abuse.</p> <p>The GLAA Business Plan has been completed by a project led by IW and has been submitted to the Home Office channels.</p> <p>IW has also finalised the document entitled: "The Nature and Scale of Labour Exploitation across all Sectors within the United Kingdom" and this is now a public document, downloadable from the GLAA website. It is an informative read with metrics and practical information on what to look for.</p> <p>ACTION POINT 1: IW to circulate document to group. Feedback welcome.</p> <p>The transition from the GLA to the GLAA is now complete and RB noted there are now 125 members of GLAA staff, 50 per cent of whom are office-based.</p> <p>Strategy and Prevention: RB acknowledged that well-known companies are on board with the Construction protocol and shared-ways of working.</p> <p>Communications and Engagement: Social media campaigns are getting the GLAA message out to an ever broader sector e.g. with Labour Exploitation document, feedback welcome from all regarding the frequency and tone of our messaging.</p> <p>Reginal Seminars are now underway – a new GLAA short film will be shown at them. All are welcome and information regarding availability is being issued and updated.</p> <p>DLME Report: Issued 8 May 2018, recommends all to have sight of the 16-page Executive Summary, some comments regarding supply chain responsibility are controversial. Sir David Metcalf is genuinely interested in GLAA activity. The Government will respond to his 37 recommendations and combine them with their response to the Matthew Taylor Review.</p> <p>Recommendations on the Licensing pilot have limitations for some sectors e.g. for nail bars and car washes in that it is unknown if they treat their staff properly. DC noted the next stage is for the GLAA to state their definitive action, however, MB reminded all of the Parliamentary summer interlude with regard to legislature. IW stated that clear timescales, milestones and owners are outlined in the Business Plan.</p>
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6.	<p>Performance and Insight Report, End of Year:</p> <p>The pack discussed in the meeting is the old framework, the new one being presented at the next Board Meeting in July 18, it has more narrative and is more informative.</p> <p>Slides highlighted at the meeting included: No. 5: 34 per cent increase in Intelligence coming in with 68 per cent from outside of the old licensing sector. Slide 8: Nationalities of victims: The spike in 'unknown' denotes anonymised data sourced via MS Helpline/Crimestoppers. Slide 9: Tasking Process – the July spike is data from how staff were inducted and should in fact be static. Slide 10: Criminal investigations at 20 – 25 per month, have stabilised.</p> <p>The new P&I pack will contain a breakdown in the length of the process time e.g. with compliance, appeals and enforcement. A positive step change is in judicial training and the number of cases referred to the CPS. Prevent will be the GLAA's first mechanism.</p> <p>Key sectors include: Car washes, fast food, cleaning, domestic servitude, textiles, scrap metal and nail bars. Numbers of referrals to NRM are growing.</p> <p>Operation AIDANT utilised GLAA input of enforcement, awareness and prevention. IW is chairing an AIDANT debrief meeting in London on 7 June.</p>
7.	<p>Licensing Standards:</p> <p>NR detailed the launch of the Licensing Standards Consultation at this meeting. A copy was handed to all attendees to take away and can also be downloaded via the GLAA website with information on how to respond.</p> <p>Two consultation events to be held in Nottingham on 7 and 11 June 2018, information on how to attend was given. Response deadline is 3 July 2018, with a launch date in October 2018.</p> <p>NR also detailed the issue of agricultural contractors working on machinery rings and technical exclusions. Anyone interested in joining a working group to look at a possible exclusion is to email NR/Licensing.</p> <p>Licence fees: NR/CW are reviewing analysis. Ongoing.</p>
8.	<p>Victimised workers arriving in the UK for non-existent work:</p> <p>Issue raised at the ALP AGM (held on 15/07/2018), whereby a worker arrives at a Labour Provider, who has no knowledge of them, the scam originates in their host country. All advised to call GLAA if they encounter this situation. Perpetrators need to be dealt with there, rather than the victims here. JB stated it should be taken on a case by case basis. IW said spotting trends and communicating these would be effective.</p> <p>DC suggested a one-page brief be created to inform industry. ACTION POINT 2: IW/NR to create brief</p>

9.	<p>Eliminating Recruitment Fees – Consultation Response on Travel Fees – joint consultation with GLAA:</p> <p>Balanced feedback after Consultation meetings incorporated into Toolkit to reflect arguments on both sides and is now with International Labour Organisations (ILO) groups for consideration.</p> <p>DC confirmed it is an open document and can be circulated freely.</p>
10.	<p>Governance:</p> <p>Home Office still aiming to appoint new GLAA Chair and 2 Board Members (ME/AC roles) but currently has unknown timescales. A legislative anomaly exists, whereby the Home Secretary is instructed to consult with the Agriculture Minister for Northern Ireland – a position which does not currently exist as the NI Parliament is not sitting. The HO are looking at ways to resolve this and promised resolution should be achieved by September 2018, however, this seems unlikely. Board members all agree they will continue in their roles in the meantime.</p> <p>CEO Appointment – a full public competition is underway to appoint a permanent CEO.</p>
11.	<p>Compliance Update:</p> <p>The Compliance update will be circulated and uploaded to the GLAA website when NC returns from annual leave. Headline figures include:</p> <ul style="list-style-type: none"> 23 x ongoing application inspections 17 x compliance inspections 17 x change of principal authorities 3 x compliance/new business <p>Trends include:</p> <ul style="list-style-type: none"> Deposits for PPE being seen more Incorrect pay/holiday pay/leavers pay Umbrella and co-employer outside of sector are increasing – CW is working towards a GLAA brief on new payroll models. <p>TE: Contracts are not being understood because of poor worker engagement, GDPR regulations and translation issues. Refresher updates for workers could be a solution? MB agreed to keep it simple and often.</p>

12.	<p>Joint Stakeholder Meeting held on 28 February 2018:</p> <p>a) The minutes were agreed as an accurate representation of the meeting.</p> <p>GDPR: NR/CW have met with the GLAA DPO to discuss slight adjustments to make the standards fully compliant, but the position remains that licence holders need to remain compliant with UK law, including GDPR. CLOSED</p> <p>Emerging Risks: ISW has created a public-facing document and will circulate to the Group. CLOSED</p> <p>Shared catch: ISW update circulated, is happy to receive any further information and deal with it in confidence. MB requests David Dickens speak with IW. OPEN</p> <p>HN circulated a note regarding response to Clearview questions. CLOSED</p> <p>b) Feedback from the three workshops:</p> <ul style="list-style-type: none">• Labour shortages – if anyone sees illegal practices creeping in, please let GLAA Intelligence be aware.• Caroline Robinson of Flex queried the actions from the Women Workers workshop and wishes to re-cast the actions. We will wait for her response.• Overall feedback: Workshops were a good way to hear and express different comments and collaborate differently. They do, however, need more structure and a clear outcome with less free-reign. It was agreed it would be productive to maintain the workshop framework. MB requested topics for discussion at the next Joint Liaison Groups.
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13.	<p>AOB:</p> <p>a) Save the date: 13 November 2018, the first Stronger Together Forum to mark the fifth anniversary of the initiative's launch. Location and venue TBA.</p> <p>b) Modern Slavery – Retailer Alignment Protocol Update: Following comments from a number of suppliers, the retailers' response is inconsistent and not as would be hoped. There is a pilot workshop on 7 June, GLAA representative requested along with Home Office, construction, LPs and suppliers who contributed to its preparation, as conducted by Hayley Gauntlett. Aim is for a document which retailers would sign and commit to good practice. When document is back from retailer consultation, DC will share with GLAA and then onto the wider LP/LU Group for comment. It is not sector-specific. Next challenge is how to engage with enforcement agencies as retail brands are protective and reticent. RB noted the legal responsibility.</p> <p>ACTION POINT 3: DC will send to IW and IW to co-ordinate at GLAA end.</p> <p>ACTION POINT 4: KT to share link to 'Dark Factories' feature (FT Magazine, 19 May 2018) into garment industry.</p> <p>c) GLAA Supplier/Retailer Protocol: All to let GLAA know how it is functioning and ACTION POINT 5: NC will circulate findings.</p> <p>d) EA informed the group of changes in Romanian law around contract edits that become law when 'norms' are published. Romanian recruitment agencies must provide a direct contract with the UK, there can be no chain leasing. EA is examining the specifics, which began in March 18, to which no norms have yet been published.</p> <p>ACTION POINT 6: EA will update LP/LU Group MB requests this as agenda item for next meeting.</p> <p>e) FH detailed the imminent launch of an educational curriculum initiative with Boston College, Lincolnshire into modern slavery within construction, beauty and engineering industries. Pilot launches on 1 June 2018 and will be shared with other colleges across the UK to use the GLAA 'Prevent' remit. FH to provide update at next meeting.</p> <p>f) JD re-iterated the importance of GLAA asking questions when victimised workers arrive looking for non-existent jobs as the danger of losing the worker is prevalent. NR will incorporate this into the Brief.</p> <p>g) JM: confidence is the key in working together to achieve the Supplier/Retailer Protocol.</p> <p>h) JY: is leaving GI Group and taking garden leave until September 2018. MB thanked JY for her contribution to the group and that we hope to meet her again.</p>
14.	Date of next meeting: 6 September 2018, GLAA, Nottingham