



Gangmasters &  
Labour Abuse Authority

# Business Plan 2018-19

May 2018

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## 1. Foreword

- 1.1 This document, underpinned by the Gangmasters and Labour Abuse Authority's (GLAA) Strategic Plan 2018 – 2021, sets out our aim, strategic priorities and operational objectives for the coming year. It provides a clear framework for the delivery of services where the exploitation of workers can be prevented, those who are abused can be protected and those who exploit can be relentlessly pursued using all legal and ethical means.
- 1.2 Work on this plan began in late 2017 and the GLAA would wish to recognise and pay tribute to the vision, inspiration and leadership provided by our late Chief Executive Paul Broadbent. This builds on that vision and his legacy as a champion for the vulnerable.
- 1.3 The GLAA Board approves and supports the delivery of this plan and is satisfied it provides the means to ensure the authority's aim, priorities and objectives continue to be met. On behalf of the Secretary of State, the Board will continue its oversight role to make sure the GLAA delivers a cost effective and efficient service whilst increasing activity to prevent exploitation, protect workers, address unlicensed activity and ensure those operating in the licensed sectors are compliant.

## 2. Introduction

### Our vision

- 2.1 Our vision is to position the GLAA as the foremost agency in the UK for disrupting and preventing labour exploitation and be recognised internationally for excellence in this field. We have recently expanded our scope of operations across the wider UK labour market supported by additional powers.
- 2.2 Our mission is challenging and complex. Labour exploitation and modern slavery have been identified as a national threat as well as an international problem. Our own assessment of the wider UK labour market has identified a number of high risk sectors employing some 10 million workers (GLAA Strategic Assessment 2018-19).
- 2.3 Our core approach to tackling labour exploitation is working in partnership to protect vulnerable and exploited workers. We are the enemy of illegitimate practices, not legitimate business.
- 2.4 The GLAA is widely recognised for its work in the licensed sector of the labour market - shellfish gathering, agriculture, food processing and food packaging – which emerged from the Gangmasters (Licensing) Act 2004. This is a reputation we are determined to grow, however, we recognise that an ever changing labour market requires us to become more effective, remain adaptable and earn the trust and confidence of those being exploited.

2.5 Confidence in the GLAA will come from us being the best in preventing and tackling exploitation by any measure, safeguarding vulnerable people and putting victims first, ensuring they receive the best possible outcomes and the support they need from our partners and bringing offenders to justice. In doing so we will uphold the very best traditions of public servants committed to helping others.

## Context and challenges

### Threat and scale of labour exploitation

2.6 The GLAA has produced an assessment of the scale and threat of labour exploitation in the UK which reflects our expanded powers and remit.

2.7 The updated national threat assessment illustrating the scale of labour exploitation and modern slavery across the UK can be summarised as follows:

- There are 10 -13,000 victims of modern slavery in the UK and 45 million worldwide (Home Office statistics)
- There has been a fivefold increase in potential victims of slavery in three years of which 55 per cent were labour related (3200+ - National Crime Agency statistics)
- Low paid, low skilled workers employed in sectors subject to seasonal or other peaks of supply and demand are particularly vulnerable (2016 GLAA National Assessment)
- The prevalence of labour exploitation, whether that be financial, physical, psychological - coercion and control, in the GLAA licensed sector is known and well understood (2018-19 GLAA National Assessment), there are, however, significant gaps in knowledge in the wider labour market
- The intelligence picture of modern slavery and human trafficking, though improving, remains fragmented. A significant increase in collection, collation and analysis is required to comprehensively understand and mitigate the threat (2016 GLAA National Assessment)

2.8 Areas of the national labour market considered at highest risk from exploitative practices and the subject of GLAA intervention, are listed below. These span the full spectrum from being suspected of failing to pay the minimum wage, to forced labour:

- Food/catering
- Car washes
- Construction
- Cleaning/hospitality
- Nail bars
- Social care

2.9 Significant work has been undertaken in building our understanding of the issues facing workers across the wider labour market. This builds on our excellent understanding of the licensed sectors and the issues facing temporary and seasonal labour in these areas. As a result, our overall insight and intelligence case is now significantly enhanced.

- 2.10 The prevalence of labour exploitation is difficult to accurately measure. However, we know an increasing number of suspected cases are being reported. The UK is one of the main destinations of trafficked workers in Europe, and labour exploitation was recorded as the most frequent type of exploitation for both adults and minors in the UK in 2017 according to NRM referral data. 2017 NRM data showed that 5,145 potential victims were referred in 2017, an increase of 35 per cent on 2016.
- 2.11 The NRM data shows that the number of Vietnamese victims is consistently high and continues to increase. Data for January to September 2017 shows that after Vietnamese; British and Albanian are the most common nationalities referred. In comparison to the NRM data, the GLAA intelligence picture indicates that exploitation of Romanian workers is most frequently reported.

### Organisational and operational

- 2.12 There are crossovers with the organised immigration crime threat, particularly concerning non-EU victims of labour exploitation. A number of non-EU nationalities, including Chinese, Sudanese and Eritrean, are assessed to be increasingly at risk of labour exploitation (Nature and Scale of Labour Exploitation GLAA 2018).
- 2.13 At the latest assessment of national data reference source, there were a significant number of Organised Crime Groups (OCGs) whose data was shared with the GLAA due to their involvement in “human trafficking, forced labour, criminal exploitation”.
- 2.14 Evidence indicates that OCG members involved in labour exploitation are most commonly British (38 per cent) followed by Romanian (10 per cent) although, for a significant proportion, nationality is not recorded. British and Romanian are also the most prevalent offender nationalities in the UK across all modern slavery offences (NCA).
- 2.15 Victims and traffickers often have the same background, sharing language or cultural similarities which facilitates recruitment and control. However, British suspects appear more readily prepared to exploit victims from other backgrounds who are already present in the UK (Nature and Scale of Labour Exploitation GLAA 2018).
- 2.16 Intelligence suggests that members of the public may be too afraid to report what they know about labour exploitation, most likely through fear of reprisals. This highlights how influential labour exploitation offenders can be within local communities.
- 2.17 The criminal business process used by potential exploiters is not judged to have changed significantly over the past twelve months (GLAA Strategic Assessment 2018-19).

- 2.18 There is more work to do to understand the impact the UK leaving the EU will have on labour exploitation as it is not yet well understood, and we will be supporting the Home Office and other Government departments in that work.
- 2.19 Some self-employment is bogus and workers in several sectors are being recruited as self-employed, which means they have fewer rights than those who are directly employed. Effective enforcement of labour regulations will protect workers against exploitative recruitment and employment practices.
- 2.20 The immigration Act 2016 created the role of the Director of Labour Market Enforcement (DLME). The Director is responsible for publishing an annual report which sets the strategic direction for the three enforcement bodies who have responsibility for labour exploitation in the UK - GLAA, Her Majesty's Revenue and Customs - National Minimum Wage (HMRC-NMW) and Employment Agencies Standards Inspectorate (EAS). The Director is also responsible for developing an information hub, with information on non-compliance in the labour market drawn from the enforcement bodies and other relevant agencies.
- 2.21 The GLAA will develop its own strategic and business plans in accordance with DLME's strategy. The GLAA is part of the Strategic Co-ordination Group (SCG), chaired by the Office of the DLME (ODLME), which brings together the operational leads of the three enforcement bodies. The group looks to enhance information and intelligence sharing between the agencies and also to promote and seek opportunities for joint working to tackle labour abuse and exploitation.
- 2.22 Whilst the GLAA enjoyed significant growth in 2017-18 of circa £2 million, as it took hold of its wider powers and extended its work across the wider UK labour market, the next financial year will require the GLAA, in common with other Home Office Arm's Length Bodies, to deliver cash efficiency savings in the region of five per cent.

### What this plan will deliver

- 2.23 The purpose of this plan is to set out how the GLAA will:
- Deliver on its priorities
  - Align and integrate budgeting and resourcing with the delivery of our priorities and provide a tool to measure, report progress and inform decision making
  - Provide more visibility to our colleagues, operational partners, wider stakeholders and the public about our activities and our impact
  - Articulate how the wider objectives and priorities including those set out in the GLAA's strategic plan and people plan, as well as the DLME's strategic plan compliment and support each other and, together, deliver a modern GLAA engaged in supporting victims and tackling labour abuse and modern slavery.

### 3. Strategic Priorities

#### Current priorities

3.1 The GLAA's overarching aim is:

'Working in partnership to protect vulnerable and exploited workers'

3.2 This will be achieved through three strategic priorities:

- Preventing worker exploitation
- Protecting vulnerable people
- Pursuing those who exploit others for their work, either financially, physically and/or through coercion and control

3.3 Underpinning this the GLAA will have six operational objectives

**One** Disrupt criminal activity within the labour market

**Two** Engage with stakeholders to minimise and manage risk

**Three** Support compliant business

**Four** Work in partnership to protect workers' rights and prevent labour exploitation

**Five** Maintain a credible licensing scheme, creating a level playing field and promoting growth

**Six** Identify and support victims of labour exploitation

### 4 Delivering on the Priorities in 2018-19

#### Preventing worker exploitation

4.1 The GLAA's licensing scheme has historically worked in partnership with business, labour users and labour providers to drive up standards of employment, in particular in areas of seasonal and temporary labour. This enables business to operate on a level playing field whilst reducing opportunities for workers to be exploited.

4.2 A comprehensive set of licensing standards have been developed which determine whether or not licences are granted. The standards were last reviewed in 2012. New standards, which reflect recent changes in regulations and employment law, will be developed and delivered in 2018-19. The new standards will be kept under continual review.

4.3 The review will take place in full consultation with affected businesses, licence holders, labour users and labour providers.

- 4.4 The terms of the Gangmasters (Licensing) Act 2004 allows the GLAA, with the consent of the Secretary of State, to set a fee for the provision of a licence. The GLAA has maintained the same licence fee charges for both applications and renewals for a number of years. These fee levels will also be reviewed in 2018-19.
- 4.5 The GLAA will deliver an excellent service to licence holders at the lowest possible cost, both to relieve unnecessary burdens on business but also to maximise the efficiency and productivity of the GLAA, whilst reducing and preventing incidents of labour exploitation.
- 4.6 To support the delivery of an effective licensing regime the GLAA is developing and introducing a new licensing system to replace its current licensing workflow system. This system will take account of research conducted across a wide range of internal and external stakeholders and be built to meet the requirements of the Government Digital Service. It will enhance user experience as well as streamlining internal processes.
- 4.7 The new licensing system will be delivered in 2018-19.

#### Operational Deliverables

- Deliver an updated version of the GLAA Licensing Standards
- Conduct a review of licensing fee levels
- Introduce a new licensing workflow system

#### Compliance

- 4.8 The GLAA licensing approach is supported by a dedicated compliance team, whose responsibility it is to assess all new licence applications submitted through the GLAA licensing system (Application Inspection). This is a fundamental part of the prevention activity for the GLAA, as potential licence holders are assessed against the current licensing standards and supported by data from other agencies.
- 4.9 Recommendations are made as to the suitability or otherwise of potential licence holders to be granted a GLAA licence from that inspection activity.
- 4.10 The compliance team also have responsibility for investigating and inspecting GLAA licence holders, where we have received intelligence or information to suggest that licensing standards are not being adhered to (Compliance Inspection). This team will also investigate breaches of Gangmaster Licensing Act legislation.
- 4.11 This type of inspection activity may lead to licences being suspended or revoked or, in serious cases, licence holders being prosecuted.



4.12 The Gangmasters (Licensing) Act 2004 covers the UK including Scotland and Northern Ireland, and we have colleagues based around the country, working closely with our operational investigation syndicates.

### Unlicensed sector

4.13 The DLME published his labour market enforcement strategy for 2018-19 on 9 May 2018. The strategy proposes a number of recommendations to tackle labour market exploitation, including a specific recommendation for the GLAA to run two local or regional pilot licensing schemes in the nail bar and hand car wash sectors.

4.14 The GLAA is working with the Home Office, the Department for Environment, Food and Rural Affairs, the DLME and partner agencies to consider the recommendation and the regulatory approaches that could be applied in the hand car wash and nail bar sectors. This work will support the Government's response to the DLME's strategy. The regulatory approaches may differ to the existing licensing process and will develop our understanding of the practicalities of licensing, compliance and enforcement methods.

4.15 The GLAA will work with the Home Office, the DLME and other enforcement bodies on the feasibility or otherwise of developing versatile licensing or supplementary schemes applicable to those areas of the labour market outside of the GLAA regulated sector. Considerations will be given to the resourcing of such schemes and the potential building of business cases for additional funding. The compliance model operated by the GLAA has proved to be very effective in the licensed sector. Based on that experience the GLAA will support this work starting in 2018-19 to identify viable models that allow GLAA compliance access and standards across other sectors. This will link in to the wider prevention work done by the GLAA which is aimed at reducing incidents of labour exploitation in the UK.

4.16 Building on the work done through our strategic assessment process we will engage with business where it is assessed there is a high risk of exploitation and other behaviours which put workers at risk.

4.17 To do this we will continue to work with compliant business to develop protocols aimed at sharing of information and intelligence, and the development of best practice which increase standards and compliance with labour laws and reduces the opportunities for labour exploitation.

4.18 Preventing worker exploitation and driving up standards is the preferred approach of the GLAA, though the effective use of enforcement powers and sanctions also serve to drive compliance (see paragraphs 4.44 – 4.57 below).

### Operational Deliverables

- Working with the DLME to develop a feasibility study to pilot versatile licensing schemes in high risk sectors

## Partnerships

- 4.19 Tackling labour exploitation is a complex cross-border, cross-industry problem that runs through supply chains. It can start outside the UK, as well as within, by those unscrupulous individuals intent on profiting from the exploitation of vulnerable individuals.
- 4.20 This business plan clearly sets out the key role and objectives of the GLAA to relentlessly pursue such individuals and groups to deliver appropriate sanction outcomes that also deliver a deterrent effect. However, the GLAA recognises that its impact on reducing the extent of labour exploitation cannot rest on a Pursue strategy alone. Therefore it also focuses on a Prevention and Awareness plan that has both national and international elements to it.
- 4.21 The GLAA values the feedback it receives from its stakeholders and has identified a number of actions from those meetings which will feed into our work on stakeholder engagement. Each action is monitored and measured at the relevant stakeholder meeting and covers areas such as communication, policy development and intelligence gathering.

## National

- 4.22 The GLAA's strategic intelligence assessments will increasingly inform the picture of exploitation across the labour market. This sets the priorities for the Prevent agenda. Since the expansion of its remit the GLAA has agreed closer working protocols with the Textile and Construction industries. Where appropriate it will consider the development of similar protocols with other industries, which may include the care and cleaning sectors.
- 4.23 The aim of such protocols is to increase the awareness of those industries on how to identify forced labour and give them the confidence to report identified cases to the GLAA, as well as enable them to develop pragmatic and effective due diligence processes to prevent labour exploitation infiltrating their supply chains.
- 4.24 The GLAA will also test different levers to secure compliance and due diligence in areas where it does not have a licensing and compliance authority. This will include testing codes of practice by consortia of stakeholders in specific industry areas (e.g. car washes, nail bars), developing methods of enabling accessibility for the GLAA to assess compliance, and assessing the effectiveness of such levers to bring about behavioural change.
- 4.25 Addressing industry sectors in silos should not be the only approach. To achieve a holistic impact on the labour market we will work with specific migrant communities – an example being ongoing work with the UK Romanian community in liaison with the Romanian Embassy - Faith groups, and Trades Unions and other worker representative groups.
- 4.26 Other cross-cutting levers can play a part in creating a greater pressure for compliance, financial risks, and a catalyst for increased and effective due diligence checks by business. We will work with the banking and insurance industries to assist them in considering how their financial procedures can identify potential

financial indicators of forced labour, as well as how those financial industries can provide a controlling effect to increase the financial risk to those individuals and organisations that may seek to exploit vulnerable workers.

- 4.27 There are other front line organisations in the public sector that either are not designated as first responders, or do not have significant knowledge of how to spot forced labour, but who may represent an untapped resource to provide further information to detect potential cases of exploitation. The GLAA is engaging at a national level with NHS, Local Authorities, Department for Work and Pensions and Education, amongst others, to assist them in developing their understanding of how they contribute to the identification and prevention of forced labour.

### International

- 4.28 The nature of cross-border labour supply chains and the level of migrant labour working in the UK to support the numbers required in various economic sectors, means that it is essential to maintain cooperation with our international counterparts. Labour inspectorates in other countries are a crucial source of information on whether companies operating in the UK from abroad are compliant with the labour laws in their country of origin. This has led to effective operational cooperation, with exchanges of labour inspectors to the GLAA. It is a successful model that the GLAA has advanced at Europol, where it has effectively supported the closer cooperation of police forces and labour inspectorates in member states.
- 4.29 We consider that this cooperation will continue to be essential post-Brexit. However, we are also conscious that the nature of the migrant workforce may change after the UK leaves the European Union. Our wider international activities, in support of programmes by the ILO, IOM, UNODC, and OSCE, enable the GLAA to illustrate the challenges faced, and dealt with, to raise awareness of what constitutes forced labour. It also allows us to highlight action that should be considered up stream in source countries and this supports the objectives of the Home Office and Foreign & Commonwealth Office in relation to priority countries considered to present a high risk of exploitation for migrant workers.
- 4.30 Sadly, labour exploitation remains a worldwide problem and the UK's exposure to it cannot be considered in isolation. Whilst exploiters may recruit migrant workers from their own communities in source countries, their migration to the UK leaves gaps in the domestic labour requirements of those respective countries. Such gaps are filled by labour from other countries which may be equally exploited.
- 4.31 The GLAA therefore plays an active part in demonstrating its approach to other countries' regulators, thereby helping build capability across the world to tackle and prevent labour exploitation.
- 4.32 We advocate our model of a combination of criminal investigative powers, civil licensing controls and inspections, as a method of providing an effective Pursue and Prevent approach. This has been demonstrated through recent developments in Australia where State licensing schemes are being implemented in Victoria and Queensland.

- 4.33 We will continue to seek opportunities to provide its expertise as an exemplar to tackle the worldwide phenomenon.

### Operational Deliverables

- To ensure international impacts are factored into prevention, and appropriate upstream activity is taken with other labour inspectorates to reduce the potential for migrants to be exploited before, and in the UK.

### Protecting vulnerable people

- 4.34 Many victims and exploited workers encountered by the GLAA are already vulnerable due to a number of factors that fall short of action required by statutory authorities. The workers may have, for example, pre-existing financial, physical, social or psychological pressures which, if left unnoticed or not addressed, leave them highly susceptible to being exploited for their labour.
- 4.35 Other vulnerabilities include shared and overcrowded accommodation, unfamiliar surroundings, no or very little spoken English, detachment and isolation from family and friends, third parties holding travel documents, thus controlling movement. These factors can lead to people being susceptible to coercion and psychological control.
- 4.36 The GLAA, as part of its prevention work, will engage with business, labour users and providers to lower the vulnerability of workers through training, awareness raising and conducting compliance inspections across the labour market.
- 4.37 Awareness will be raised in communities, across business and countries of origin about spotting the signs of exploitation. The GLAA has developed a substantial library of material in a variety of languages to get the message across.
- 4.38 The GLAA identifies potential victims of labour exploitation or modern slavery through its compliance and investigation activity and is a designated 'first responder' (i.e. can refer directly) to the National Referral Mechanism (NRM), the UK's framework for identifying and supporting victims of human trafficking or modern slavery. Where suspected victims of modern slavery do not consent to a NRM referral, the GLAA has a legal duty to submit a notification to the Secretary of State.
- 4.39 The GLAA has systems in place to support victims through the investigation process and all GLAA staff are aware of their individual roles and the requirement to keep victims updated on the progress of allegations and investigations.
- 4.40 In 2018-19, as a direct result of the GLAA's expansion of its powers to investigate labour market offences across the wider labour market, we will provide specialist training to a cadre of our investigators to carry out more formal victim liaison roles.

- 4.41 We are also building relationships with victim services in UK police forces and the UK Court estate to ensure that victims are given a high standard of service and receive appropriate support to keep them engaged in the prosecution process, whether that be on GLAA-led investigations or those done in partnership with other operational partners.
- 4.42 We intend to do more work on understanding what victims need and look to improve what we do thus increasing victim satisfaction in the work of the GLAA, as the scope and breadth of our reach in tackling labour exploitation widens.
- 4.43 In addition, the GLAA will continue to develop a better understanding and knowledge of issues from a worker perspective and we have bespoke groups in place, for example the Worker/NGO liaison group which allows for discussion of specific issues and emerging trends.

#### Operational Deliverables

- Provide specialist training to GLAA staff to carry out formal victim liaison roles
- To continue to build relationships with victim services and wider law enforcement to ensure that victims are provided with a high standard of service
- Develop work on increasing the understanding of what victims require and improving what we do, increasing the satisfaction in the work of the GLAA

#### **Pursuing those who exploit others for their work, whether financially, physically and /or through coercion and control**

- 4.44 The GLAA has invested in its investigative capability and has four operational syndicates across the UK, working closely with our compliance team. The geographic split of the syndicates takes account of the Police Regional and Organised Crime Units (ROCU) which coordinate greater partnership with wider law enforcement, other government agencies and local authorities.
- 4.45 In addition to powers already available to the GLAA to investigate offences under the Gangmasters (Licensing) Act 2004, we now have additional powers under the Police and Criminal Evidence Act 1984 and the Immigration Act 2016. This has resulted in the creation of trained and authorised officers to investigate labour market offences across the wider UK labour market.
- 4.46 These officers have been given powers to investigate offences under the Employment Agencies Act 1973, National Minimum Wage Act 1998 and Modern Slavery Act 2015, in respect of forced or compulsory labour. These powers are only applicable in England and Wales and are exercised in cooperation with partner agencies.

- 4.47 Our operational investigative resources are targeted specifically against the 'Pursue' element of the GLAA's strategic approach. Investigators are available seven days a week to respond to allegations of labour exploitation, abuse and modern slavery.
- 4.48 The GLAA will pursue relentlessly those who exploit workers and protect those who are vulnerable to exploitation using a range of civil and criminal powers and orders available to us.
- 4.49 As the GLAA expands its work and its understanding of the scale and threat increases, there will be a need for the GLAA to consider expanding its operational capability and capacity. Demand is continuing to grow and work will take place in 2018-19 to develop options to increase operational capability and capacity. If further resources are required then a robust business case will be required.
- 4.50 The GLAA will also continue to build closer working arrangements with agencies and other regulators such as EAS, HMRC, and food crime bodies. In the wider labour market EAS and the GLAA will have a greater synergy in tackling agencies who supply labour. This will also streamline investigation activity.
- 4.51 The Immigration Act 2016 introduced measures to provide a more coherent framework for identifying and preventing abuses of labour market legislation and to strengthen the enforcement response. This includes new powers to apply for Labour Market Enforcement (LME) undertakings and orders. These interventions are intended for more serious or persistent offenders to prevent further offending and/or exploitation.
- 4.52 The introduction of the undertakings and orders regime is integral to the Government's intention to introduce a broader and harder edge to enforcement of labour market offences when these are committed deliberately or recklessly and are not simply a consequence of process or procedural error.
- 4.53 This means that for the first time, a prison sentence can ultimately result from some key labour market offences which currently only attract a civil penalty or a criminal fine. A two year custodial penalty and/or unlimited fine is available where a business breaches a LME order which has been made by a court.
- 4.54 The GLAA is also the only agency which can impose a LME undertaking or apply for a LME order which is for a combination of offending across GLAA, NMW and EAS legislation.

### **Slavery and Trafficking Risk Orders and Slavery and Trafficking Prevention Orders**

- 4.55 Slavery and Trafficking Risk and Prevention Orders were introduced in the Modern Slavery Act 2015 as ancillary orders. Their purpose is to prevent slavery and human trafficking offences being committed by someone who has already committed such offences, or to prevent someone who may commit these type of offences from doing so.



- 4.56 The GLAA will actively consider the use of these orders in appropriate cases in 2018-19.

### UK Powers

- 4.57 The Gangmasters (Licensing) Act 2004 is UK wide legislation. However, with its new powers under PACE 1984, the GLAA can only investigate labour market offences across the wider labour market in England and Wales.

### Operational Deliverables

- Consider expanding the GLAA operational capability and capacity
- To consider more widely a range of powers and orders to prevent labour exploitation
- To set out proposals for powers to align the GLAA's approach in England and Wales to Scotland and Northern Ireland

## 5. Enablers and constraints for delivering the plan

- 5.1 The GLAA is funded by the Home Office and the 2018-19 expenditure is £7.9 million. This represents an increase in cash funding of £2.7 million from 2017-18 which reflects the increase in the role and scope, powers and responsibility the GLAA has had since the spring of 2017.
- 5.2 Currently the GLAA employees 130 colleagues, 56 of whom are based at its head office in Nottingham, providing core central functions including licensing, the collation, analysis and management of intelligence, investigations, and corporate service functions.
- 5.3 The GLAA operational priorities can only be delivered if we provide our front line investigators and colleagues with the right backing: that is, equip our colleagues with the skills and the technology which enables them to respond effectively to incidents of labour exploitation and modern slavery. For our investments to have a real impact we must ensure that our workforce and the way each of us work is inclusive, capable and flexible.

### Intelligence and operational capability

- 5.4 The GLAA has a dedicated intelligence function which has responsibility for the collation, analysis, assessment and management of intelligence and information which comes into the GLAA on a daily basis.
- 5.5 Information is processed via a triage system which grades our operational response based on risk to victims and the general public. The GLAA use the UK wide National Intelligence Model (NIM) and has extensive information and intelligence sharing protocols in place to allow the receipt of and the sharing of intelligence and information with other agencies.

- 5.6 The approach to intelligence also assists in identifying the appropriate response to allegations of labour exploitation and modern slavery, and whether the GLAA is best placed to provide that response either on its own or in partnership with others.
- 5.7 The Intelligence function is also responsible for the development of our Strategic Intelligence Assessment through which the GLAA will develop its operational priorities to respond to the nature and threat of labour exploitation in the UK. This assessment also supports the UK threat assessment undertaken by the NCA and the ODLME annual reports and strategy.
- 5.8 The GLAA has a number of 'field based' intelligence officers, who work with our operational investigation syndicates in developing intelligence and information into a response against those who exploit workers.
- 5.9 Our intelligence capability also has the ability to conduct financial intelligence work which will highlight opportunities to utilise powers under the Proceeds of Crime Act 2002 and Criminal Finances Act 2017 to seize and/or recover money which has been obtained through criminal means.
- 5.10 At an operational level, the GLAA will maintain its intelligence-led and risk based approach meaning that compliance and enforcement activity will be carried out following an assessment of information and intelligence received and not on a percentage, random or quota basis.
- 5.11 The GLAA possesses the capability to interrogate and obtain evidence from the myriad electronic devices available to those who commit crime and exploit workers and/or vulnerable people. In today's ever connected world, criminals communicate with each other and target their victims using digital media.
- 5.12 We will continue to enhance our capability and training in 2018-19 to identify opportunities to prevent labour exploitation and modern slavery happening. It will also identify opportunities to disrupt those who offend and obtain the evidence available to bring offenders to justice.
- 5.13 The GLAA has already identified a financial intelligence capability and we also have the ability to investigate money flows which assist in building prosecutions against those who commit this type of crime but also to identify criminally obtained money and assets which can be seized and or confiscated.

## People

- 5.14 The success and effectiveness of this plan is dependent on GLAA colleagues and we want to enable them to do this in the best conditions. That means equipping our people with the right skills and the right tools to do their job, as well as being clear about our goals and how each role contributes.
- 5.15 Our people strategy 2018-21 sets out the changes we will make by 2020 towards an organisation that is inclusive, capable and flexible.



5.16 The key areas that the GLAA will continue to focus on in 2018-19 are:

- Developing our workforce to create a multi-skilled, flexible team with the right skills and behaviours.
- Reviewing our internal structures to ensure they are effective and proportionate for the size and complexity of the organisation.
- Leadership development to support our managers in promoting equality as part of their roles and putting inclusive leadership at the heart of delivery.
- Ensuring our workforce is truly representative of all sections of society working in an environment where each employee feels respected and able to give of their best.
- Improving employee engagement by taking action on feedback received through internal communication channels such as colleagues' surveys and employee forums.
- Review of our reward and recognition systems to support organisational performance as well as drive engagement.

5.17 Additionally, we will have a workforce plan to give us clarity on who is available for deployment and allow us to see where there are gaps we need to be aware of when forecasting resource availability. In addition, the plan will have a future focus to include trainee schemes for roles such as investigators and intelligence officers, and succession planning.

5.18 To enable the GLAA to deliver on its people plan we will, in 2018-19, develop all our managers to promote and deliver equality as part of their roles, putting inclusive leadership at the heart of delivery.

5.19 Our people plan will look to change the face of the GLAA by readdressing its age profile, its gender split and other representations and also by actively supporting the development of its own staff to aid recruitment and retention of colleagues to deliver on the priorities of the GLAA.

5.20 We will forecast on capabilities on a six monthly basis through a review of our business and people plan, not just numbers, ensuring that we can take a longer term view on the specialist skills we need to attract or develop.

5.21 We will develop a resource model which extends the flexibility and availability of our colleagues to call upon people at periods of high demand.

5.22 We will ensure our management structure is as flat as possible enabling our leaders with more devolved responsibilities and putting managers at the heart of decision making.

5.23 The GLAA already has a flexible workforce and we aim to deliver greater flexibility for colleagues who take short term breaks in service and support them to continue in the career with the GLAA, in particular supporting our female workforce.

5.24 The GLAA strongly believes that providing a high quality of service to the public is not simply about what it does; it's equally about the way it is done. Its values, shared by all colleagues, are the foundations that underpin the delivery of the aim, priorities and objectives:

- P** Professional
- R** Respected
- O** One Team
- U** Utmost Integrity, trust and openness
- D** Doing it differently

5.25 In 2018-19 the GLAA will reconfigure its investigator training programme to recruit and train from the 'ground up'.

5.26 We will also start work on wider workforce planning aimed at growing talent. Some initiatives will include a potential apprenticeship scheme and trainee investigator programme.

### Training

5.27 GLAA colleagues are exposed to, and confront, some distressing and demanding situations. To keep our colleagues and the public safe our organisation needs to constantly improve and learn in a world that is changing fast, from the threats we manage, to the communities and victims we serve, changes in the employment market, new technology or policies and the legal environment.

5.28 Training is a powerful enabler to ensure our service embodies our PROUD values. It enables our colleagues to shoulder the personal, legal and professional risks they manage on our behalf every day.

5.29 We need to be able to flex training provision to anticipate operational changes and to take account of our growing understanding of the emerging threats across the wider labour market, supported by an improved training infrastructure and industry expertise.

5.30 In 2018-19 we will review how we can improve our training capability to be more responsive to both a changing operational landscape and our growing understanding of the emerging threats across the wider labour market. We will be doing work to ensure that all of our colleagues, both new and existing, have the right skills to perform their roles to the highest standards. We will, in addition, ensure that training for our specialist officers i.e. Labour Abuse Prevention Officers, is continuously reviewed to ensure it is up to date with PACE and EAS and HMRC training.

## Finance

- 5.31 Details of the GLAA budget for 2018-19, broken down by function, is detailed below.

Area	Cash budget per cent	£
CEO/Board/Secretariat	5	362,597
Licensing	7	515,894
Strategy	2	139,382
Prevent/Business Change	7	473,142
Human Resources	4	287,169
Communications	3	228,456
Operations	67	4,774,300
Business and Finance	5	369,060
Total	100	7,150,000

### Efficiency savings

- 5.32 In 2018-19 the GLAA will be required to deliver cash savings of 5 per cent on part of its budget allocation for 2018-19 and a further 5 per cent in 2019-20. The GLAA has developed a savings plan to meet these requirements in 2018-19 and will need to be in a position to deliver the identified savings in 2019-20. This reduction in funding will also need to account for inflationary and growth pressures.
- 5.33 The impact of the budget saving will be £250,000 in 2018-19 and a further £400,000 in 2019-20 (£650,000 total). The GLAA will be identifying productivity and efficiency improvements with the aim of protecting front line operational service delivery. Over 70 per cent of GLAA budgets relate to colleagues and most of its other costs are driven by people. The savings plans will therefore inevitably reduce numbers, but the GLAA plans to achieve these reductions through natural turnover.

### Licence fees

- 5.34 During 2018-19 the GLAA will review its licensing fees. The fees the GLAA charges have not changed since 2012. The GLAA will ensure that the licensing regime continues to provide a cost effective regime. Wide ranging business and public consultation will take place and any changes will require the consent of the Secretary of State.

### Capital funding

- 5.35 In recent years the GLAA has secured capital funding from the Home Office to support its transition to a new IT infrastructure and address key risks around legacy IT systems. This transition work will continue into 2018-19 and the GLAA has secured £300,000 to support this work.

## IT

- 5.36 The GLAA remains on the Defra IT infrastructure. The process for the transition from those platforms to the Home Office IT infrastructure commenced in 2017-18. The GLAA will complete this transition during 2018-19.

## Telephony

- 5.37 As part of the transition to new platforms the GLAA intends to replace its current telephony and call recording system. The current system will be replaced during 2018-19.

### Key operational deliverables in 2018-19 for our enabling functions are:

- Enhance the GLAA capability in e-forensics
- Redesign the GLAA resource model to one which extends the flexibility and availability of our colleagues at periods of high demand
- Develop our managers to promote and deliver equality
- Reconfigure investigative training programme from the 'ground up'
- Develop potential apprenticeship and trainee investigator programmes
- Review how the GLAA can improve its training capacity and training programmes
- Develop an efficiency plan that delivers 5 per cent cash savings
- The transition from Defra to Home Office IT infrastructure
- The replacement of the current telephony system

## 6. Ensuring and monitoring outcomes

### Performance framework

- 6.1 We will continue in 2018-19 to revamp and refresh our performance framework, bringing together for the first time a suite of performance indicators which measure the GLAA's activity whilst overlaying financial and people data.
- 6.2 The purpose of introducing a new approach to performance is to ensure robust oversight by the GLAA Board, Home Office sponsors and other key stakeholders, whilst also improving the overall performance and value for money of the GLAA.

- 6.3 The new performance pack will be available in the first quarter of 2018-19 and will provide:
- A single suite of performance measures which comprehensively reflects the breadth of the GLAA's programme of activities.
  - A framework for continuous measurement, monitoring, understanding, reflecting and improving on its performance.
  - A fully integrated approach with the GLAA's strategic objectives and key performance questions.
- 6.4 The GLAA collects data that supports a number of key performance indicators which are categorised into Prevent, Protect and Pursue, covering areas of victims, intelligence, communications, investigations, licensing, compliance, learning and development, efficiency, human resources and finance.
- 6.5 Throughout 2018-19 continued development of this new framework will lead to an improvement in operational processes and the confidence of the data relied on by the GLAA.
- 6.6 Oversight and scrutiny of the GLAA comes from its Board, the Home Office and the DLME. The performance framework is also a key vehicle, and outputs and outcomes will be measured through this framework and its indicators to evaluate this business plan.
- 6.7 In order to demonstrate the wider impact and difference made to the picture of labour exploitation in the UK by GLAA activity, performance will also be measured at a strategic level against five key performance questions (KPQ).
- 6.8 This will be achieved by assessing each of the 232 key performance indicators (KPIs) that have been aligned to each of the KPQs. The data supported by extensive narrative will allow the confidence in the ability of the GLAA to answer the questions we have posed against ourselves.

#### Key operational deliverable in 2018-19

- Development of the performance and insight regime

Key performance Questions	
KPQ 1	How comprehensive is the GLAA's understanding of the scale and threat of labour exploitation in the UK?
KPQ 2	How effective is the GLAA's response to the identified threats of labour exploitation and modern slavery?
KPQ 3	How effective is the GLAA at working with partners to tackle labour exploitation and modern slavery?
KPQ 4	How effective is the GLAA at working with businesses, labour users and providers to drive up standards, preventing and tackling labour exploitation and modern slavery?
KPQ 5	How effective is the GLAA at managing its resources?

### Scrutiny

- 6.9 The GLAA will continue to measure its outcomes from all activity through its integrated performance framework. The focus though is not solely on outcomes but seeks to evaluate the 'So What?' question to identify the difference the GLAA makes to the nature and threat of labour exploitation in the UK.
- 6.10 The range of outcomes linked to the powers available to the GLAA range from a simple warning notice up to, and including, life imprisonment for offences of modern slavery.
- 6.11 In recognition of the extended investigative powers conferred on the GLAA, its colleagues, who are trained and accredited with police-style PACE powers, will come under the oversight of the Independent Office for Police Conduct (IOPC).
- 6.12 The GLAA will also be subject to voluntary inspection by Her Majesty's Inspectorate of Constabulary and Fire and Rescue (HMICFRS) in the use of its new criminal powers, the first one being scheduled in the third quarter of 2018-19.
- 6.13 We welcome other oversight and scrutiny already provided by the Office of the Investigatory Powers Commissioner (OPIC), who were very complimentary in its recent 2018 inspection of the GLAA, in relation to criminal investigatory matters and the Parliamentary and Health Service Ombudsman for civil issues.
- 6.14 This oversight gives confidence over the appropriate and proportionate use of the wide range of powers available to the GLAA to tackle exploitation and modern slavery, giving confidence in the methods used to obtain outcomes from its operational activity.

- 6.15 The GLAA will strive to improve its outcomes and there are some key principles that underpin our operational activity and will steer the changes to our operational delivery model as we continue to grow and make use of enhanced powers.
- 6.16 We want to get better at supporting victims, providing a service, at first contact and during the investigation that produces the right outcome for them, and the right outcome for society in bringing offenders to justice.
- 6.17 Given the fact that the GLAA has finite resources, we will strive to get better at providing the right response from the start (whether from us or a partner) and manage our work in the way that is most effective.
- 6.18 We want to use the powers and orders available to us in a way that improves the way we deal with offenders, reducing the chance of them re offending, thus reducing the incidents of labour exploitation and modern slavery.

#### Key operational deliverable in 2018-19

- Support the HMICFRS in its first inspection of the GLAA's use of its PACE powers.

## 7. What we aim to achieve in 2018-19

7.1 This section brings together all the key performance targets and key operational deliverables for 2018-19 into one place for ease of reference.

### Business Plan Performance Measures

Objective	Aim	Measure	Baseline 17-18 to 31 March	Target 18-19
Disrupt criminal activity in the labour market	To work to increase the number of GLAA led enforcement investigations, whilst maintaining our work in partnership	Investigations closed by lead	Active 68 Closed 60 Average per month 5	Increase from baseline
	To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations	GLAA-led convictions Sanctions	Convictions 6 Enforcement Notices / Warnings 107 LME0 2 LMEU 5	Increase percentage of cases resulting in an outcome
	To make use of financial investigation powers in investigations	Number of investigations featuring proceeds of crime investigations (POCA)	0	Increase on baseline
Engage with stakeholders to minimise and manage risk	To expand the GLAA outreach to engage with a larger number and more diverse range of stakeholders	Numbers of protocols Percentage of people signed up to protocols	New KPI	Create baseline
	To prioritise engagement with stakeholders	Number of general issues reported by sector Events contributed to by sector	New KPI	Create baseline which will be a correlation between events attended and general issues reported by sector



Objective	Aim	Measure	Baseline 17-18 to 31 March	Target 18-19
Support compliant business	To ensure all licensing queries are responded to within 5 working days.	Number of licensing queries responded to within 5 working days	New KPI	90%
Work in partnership to protect workers' rights	To work to increase the number of enforcement investigations undertaken in partnership, whether GLAA or partner led	Joint investigation closed	Active 44 Closed 106 Average per month 9	Increase from baseline
Maintain a credible and effective licensing scheme, create a level playing field and promote growth.	To address the time it is taking to process a licence application, ensuring this is kept to the standard	Days taken to complete licensing applications, broken into sections of process from the licence fee being cleared to the licensing decision being made	Average 76 working days  Percentage completed within 30 days 0%	90% within 30 days
	To review the time taken to complete a compliance investigation, allowing us to target persistent non-compliance in the regulated sector	Days taken to complete compliance investigations, broken into sections, from date raised to licensing decision being made	Average for last 3 years; 185 working days  Percentage completed within 30 days; 1.64%	90% within 30 days
Identify and support victims of labour exploitation	To work towards prioritising victims as part of our investigations	Potential victims assisted (directly/indirectly)	3,876 potential victims identified as suffering direct abuse  NRM referrals 58  MSI (Duty to Notify submissions) 86  % of enforcement	Increase the percentage of cases where victims are identified

Objective	Aim	Measure	Baseline 17-18 to 31 March	Target 18-19
			cases resulting in identification of victims 34 = 20%	
			% of compliance cases resulting in the identification of victims 7 = 29%	
	To be compliant with the Victims Charter requirements	Victim satisfaction results	New KPI	To baseline  Create and implement measures for victim satisfaction and begin recording output
Prevent labour exploitation	To raise awareness of the signs of modern slavery by providing external training	Number of training sessions provided to partner agencies and industry sources	New KPI	To baseline

## Operational Deliverables

In 2018-19 we will	Lead	Internal or external partners	By When	Risk of non-completion	RAG Rating	Priority
Development of the new performance and insight regime	Director of Operations	Internal External key stakeholders	Q1	<b>High risk:</b> both operationally and reputationally, to deliver a performance frame work which meets the needs of the organisation. Stakeholders and the public as to the difference being made by the GLAA	Red	Red
To consider more widely a range of powers and orders to prevent labour exploitation, such as the wider PACE and Proceeds of Crime Act powers	Director of Operations	Internal	Q1	<b>Medium risk:</b> Business as usual. In addition to PACE and POCA, there will be more effective use of LMEU/LMEO powers.	Yellow	Yellow
Develop an efficiency plan that delivers 5 per cent cash savings in 2018-19	Chief Executive	Internal	Q1	<b>High risk:</b> Business critical as there is a requirement to deliver the efficiency plan in-year. The plan will be delivered in Q1 but delivered through to end of Q4	Red	Red
To provide specialist training to GLAA staff to carry out formal victim liaison roles	Director of Operations	Internal	Q2	<b>High risk:</b> Operationally - The victim journey and support to victims is a national priority and it is essential that the GLAA can deliver for and support victims	Red	Yellow
To continue to build relationships with victims' services and wider law enforcement to ensure that victims are provided with a high standard of service	Director of Operations	External including NGO's and Law Enforcement	Q2	<b>High risk:</b> Operationally - The victim journey and support to victims is a national priority and it is essential that the GLAA can deliver for and support victims	Red	Yellow

In 2018-19 we will	Lead	Internal or external partners	By When	Risk of non-completion	RAG Rating	Priority
Develop our managers to promote and deliver equality	Director of People and Licensing	Internal	Q2	<b>Medium risk:</b> Training and awareness plan to be developed by Q2. Training to be delivered throughout the year	Yellow	Yellow
Move from Defra to Home Office IT infrastructure	Deputy Director for Business Change	Internal	Q2	<b>High risk:</b> Business critical in order to ensure ongoing IT system delivery and support through the Home Office	Red	Red
Introduce new Licensing workflow System	Director of People and Licensing	Internal	Q3	<b>High risk:</b> Business critical as current systems will cease to be supported by the end of 2018	Red	Red
Working with the DLME to develop feasibility to pilot versatile licensing schemes in high risk sectors	Chief Executive	Internal/external and business	Q3	<b>Low risk:</b> Will be dependent on the work of the DLME in developing the pilot schemes	Green	Yellow
To enhance the GLAA capability as regards e-forensics	Director of Operations	Internal	Q3	<b>High risk:</b> Operationally - to enable the organisation to deliver on high quality investigations and to enhance its protection of victims	Red	Yellow
To re-design the GLAA resource model to one which extends the flexibility and availability of our colleagues at periods of high demand	Director of Operations	Internal	Q3	<b>High risk:</b> Operationally - to meet the rising demands on the GLAA as the full extent of labour exploitation in the wider labour market becomes clearer	Red	Yellow
Reconfigure investigative training programme to train from the 'ground up'	Director of Operations	Internal	Q3	<b>Low risk:</b> Desirable outcome to invest in current staff	Green	Green
Review how the GLAA can improve its training capacity and training programmes	Director of Strategy	Internal	Q3	<b>Medium risk:</b> Desirable outcome to complement and enhance the GLAA's operation capability and its people plan	Yellow	Green

In 2018-19 we will	Lead	Internal or external partners	By When	Risk of non-completion	RAG Rating	Priority
Support the first inspection of the GLAA by HMICFRS	Director of Operations	Internal/external	Q3	<b>Low risk:</b> Plans are already in place to support the inspection process	Green	Red
Consider expanding the GLAA operational capability and capacity	Chief Executive	Internal/external	Q3	<b>Low risk:</b> This will be dependent on levels of demand and associated work and options to increase operational capability. If further resources are needed then a robust business case will be required	Green	Yellow
Replace the current telephony system	Deputy Director for Business Change	Internal	Q3	<b>High risk:</b> Business critical in order to maintain the current level of service	Red	Red
Deliver an updated version of the licensing standards	Director of People and Licensing	External including business/labour user/labour provider consultation	Q4	<b>Medium risk:</b> The standards were last reviewed in 2012. These need to be updated to reflect changes in regulations and employment law. Also requires external consultation	Yellow	Yellow
Conduct a review of licensing fee levels	Director of People and Licensing	External including business/labour user/labour provider consultation	Q4	<b>Medium risk:</b> Requires wider consultation and also consent of the Secretary of State to vary the licence fees	Yellow	Yellow
Develop work on increasing the understanding of what victims require and improving what we do, increasing the satisfaction in the work of the GLAA	Director of Strategy	External including NGO's	Q4	<b>Low risk:</b> This is a desirable outcome but will follow the more important work of improving the service and support the GLAA provide to victims	Green	Red

In 2018-19 we will	Lead	Internal or external partners	By When	Risk of non-completion	RAG Rating	Priority
To develop potential apprenticeship and trainee investigator programmes	Director of Operations	Internal	Q4	<b>Low risk:</b> Desirable outcome for the long term future and people development within the GLAA	Green	Red
To set out proposals for powers to align the GLAA's approach in England and Wales to Scotland and Northern Ireland	Director of Strategy	External/ international	Q4	<b>Medium risk:</b> This has been initiated with the Scottish Executive. Further meetings to be held. If supported a key issue will be the extent to which Brexit might impact legislative changes elsewhere	Yellow	Green
To ensure international impacts are factored into prevention, and appropriate upstream activity is taken with other labour inspectorates to reduce the potential for migrants to be exploited before, and in, the UK	Director of Strategy	External/ international	Q4	<b>Medium risk:</b> This reflects ongoing work tasked to the GLAA through the Modern Slavery Strategy to develop the network of labour inspectorates that is being sustained through Europol engagement, and further engagement through the EU platform on undeclared work to secure funding for labour inspectorate exchanges	Yellow	Green

### Key

Red	This is business critical and high risk and therefore delivery is critical within this business plan year
Yellow	There is risk to us operationally and reputationally in not delivering the objective and every effort will be made to deliver on it, however, it would not be business critical if it was not completely delivered
Green	There is little risk operationally or reputationally to the GLAA if this deliverable is not met within the year so falls low on the prioritisation of risk

## Appendix - Executive Organisational Structure

