



Gangmasters
Licensing Authority

Strategy for Protecting Vulnerable and Exploited Workers 2015-2018



Working in partnership to protect vulnerable and exploited workers

Contents

1. Introduction.....	1
2. Background to the Gangmasters Licensing Authority.....	2
3. Remit and Resources.....	3
4. Governance and Scrutiny.....	4
5. Current Landscape.....	6
6. Operational Activity.....	8
7. Strategic Aim, Priorities and Outcomes 2015 – 2018.....	10
8. Delivering the Plan 2015 - 18.....	12
9. Risk Management.....	15
10. Summary.....	16
Appendix A: Strategy for Protecting Vulnerable and Exploited Workers 2015-18.....	17

1. Introduction

- 1.1 This strategy consolidates and develops the 2014-17 plan and sets the direction for the Gangmasters Licensing Authority (GLA). It was developed and refined after extensive consultation with key stakeholders, labour providers and users, retailers, law enforcement partners and workers themselves.
- 1.2 The strategy has been shaped by a number of key Governmental reports and reviews, ministerial statements, strategic and operational assessments, both nationally and internationally, all of which illustrate a constantly changing landscape within the sector that the GLA regulates.
- 1.3 During 2014 -15, the UK has seen a marked increase in labour exploitation ranging from unlawful travel and subsistence schemes and withholding holiday pay up to and including examples of human trafficking, forced labour, benefit fraud and other heinous crimes committed by organised and determined criminals who have sought to infiltrate the legitimate human resource supply chain. The expected enactment of the Modern Slavery Act 2015 has also created media, operational and strategic focus on safeguarding of people vulnerable to exploitation and the function of the GLA.
- 1.4 A national modern slavery strategy and implementation plan have also been introduced which seek to deliver tangible outcomes from the introduction of the Modern Slavery Act but also other, non-legislative activities under the auspices of the Prevent, Protect, Pursue and Prepare work streams. The GLA has a number of actions within the plan having been identified as the UKs foremost investigative agency into labour exploitation.
- 1.5 Significantly, on 9 April 2014, the Prime Minister announced that the Home Office would take over responsibility for the GLA from the Department of Food, Environment and Rural Affairs (Defra) with immediate effect. This announcement was welcomed as it is a natural step towards working more collaboratively with those other organisations who seek to eradicate modern slavery. Since that time the transition to the Home Office has provided the GLA with access to training, resources and much greater collaboration with other UK law enforcement agencies.
- 1.6 The GLA is uncovering more and more cases of vulnerable people being exploited in the United Kingdom (UK) by organised criminals with the intention of making entirely unlawful and immoral profits. However, the work the GLA carries out in this arena is not to the detriment of the civil regulatory powers we exercise, which we continue to carry out in equal measure.
- 1.7 On 10 April 2014 the findings of the Triennial Review of the GLA were published. These reviews are carried out on all Non-Departmental Public Bodies (NDPBs) to ensure the respective roles they perform are necessary, and that they are complying with principles of good corporate governance. The GLA review concluded that the functions it performs are necessary, and that it remains the right body for delivering them. It also concluded that the GLA should remain a NDPB but should seek to reduce the size of its governance board. Having implemented the Government's proposals for a smaller board made up of eight non-executive directors, plus its Chair, the GLA will work hard to ensure that the voices of its wide

variety of stakeholders will continue to be heard.

- 1.8 It also stated that the Authority should continue working to deliver reforms that were already under way namely, reducing the financial and administrative burdens on compliant businesses, whilst exploring opportunities for alternative sources of revenue. The report also recognised that the GLA is continuing to seek ways of working in partnership with industry and with other enforcement bodies to expose those who exploit workers for their own advantage.
- 1.9 This document sets out a clear single aim and three strategic priorities underpinned by six key outcomes which will focus the efforts of the GLA over the next three years and build on successes thus far. This can be viewed on a single page at appendix A.
- 1.10 There will be a much greater focus on preventing worker exploitation with a distinct approach to early engagement with the entire supply chain to protect workers by sharing information and intelligence at an earlier stage. This cannot be achieved alone and the GLA recognises that it needs to work tirelessly with ethical labour users, providers and retailers to identify the signs of exploitation and take collaborative and decisive action to eradicate such conduct.
- 1.11 This Authority will continuously seek to improve communication at all levels and will provide timely and relevant information as well as harnessing new techniques for reaching a wide range of groups in our communities. The leadership skills of all our staff will continue to be developed to improve performance across all areas of our work.
- 1.12 This ambitious plan has been developed against challenging budget reductions but through a forensic approach and ongoing evaluation into how and where precious resources are used, the GLA will continually strive to meet and exceed its stated aim.
- 1.13 The aim of the GLA is to work in partnership to protect vulnerable and exploited workers – this strategy is the plan to achieve that aim.

2. Background to the Gangmasters Licensing Authority

- 2.1 The Gangmasters (Licensing) Act 2004 (the Act) provides for a licensing scheme to regulate the supply of labour to the farming, food processing and shellfish gathering sectors and established a NDPB, the GLA, to administer the scheme.
- 2.2 The 2004 Act was introduced into Parliament to tackle exploitation of workers in the agriculture, shellfish gathering and food and drink processing and packaging sector. It was adopted by Government in the wake of the death of 23 cockle pickers in Morecambe Bay in February 2004. The Bill aimed to protect the most vulnerable workers employed in the regulated sectors by ensuring those engaged in the supply of workers, or who use workers to provide a service, meet minimum employment and other standards.

2.3 Compliance with the legislation is assessed by information held by Government departments e.g. HM Revenue and Customs (HMRC) and from assessment made when a licence application is made. The GLA also carries out risk based inspections and responds to specific complaints of abuse that are raised. The 2004 Act created four criminal offences arising from the licensing scheme:

- Operating as an unlicensed gangmaster;
- Entering into arrangements with an unlicensed gangmaster;
- Obstructing GLA officers; and
- Having false documentation.

2.4 The GLA covers the whole of the UK carrying out intelligence led activity and inspection. Staff work closely with other enforcement bodies such as the police, HMRC and the United Kingdom Border Agency. As an Arms Length Body, the GLA is sponsored by the Home Office, but also works with other departments such as the Department for Business, Innovation and Skills (BIS), Defra and HM Treasury.

3. Remit and Resources

Remit

3.1 The GLA regulates the activities of gangmasters in the farming, food processing and shellfish gathering sectors across the whole of England, Scotland, Wales and Northern Ireland. For the purposes of the 2004 Act a gangmaster is a person who supplies a worker to do work covered by the Act; or who uses a worker to do work covered by the Act in the course of providing a service, or makes arrangements for that worker to do the work.

3.2 The GLA head office is situated in Nottingham where currently 31 of its staff are based. They undertake core central functions including licensing, collating, analysing and managing intelligence, based on a threat and risk methodology, finance, IT and HR. A further 35 enforcement officers and managers are home based across the UK to maintain a licensing scheme protecting approximately 700,000 workers.

3.3 In addition to the regulatory aspect of the GLA, a key strand of activity is working with law enforcement partners to identify, disrupt and dismantle serious and organised criminality, people trafficking and other crimes whereby criminal 'entrepreneurs' seek to exploit human assets for profit. The GLA has a firm commitment to protect its 'front line' in times of austerity and this year is reviewing the way its services are delivered to maximise effectiveness and efficiency.

Resources

3.4 The GLA is a small NDPB. Its head office is situated in shared Government owned accommodation, with half its staff being home based. Any future significant budget cuts will inevitably result in some reduction in headcount.

- 3.5 The GLA has, in line with other public sector agencies, seen funding reduce by over 20% as a consequence of spending review settlements. Wherever possible the GLA has sought to protect front line services and consequently the majority of savings to date have been achieved as a result of reductions to back office staffing levels. The Authority does, however, have innovative plans for income generation and ultimately business growth which are necessary to get up stream of the criminal entrepreneurs that seek to infiltrate legitimate supply chains and profit from the labours of vulnerable workers.
- 3.6 Currently the GLA operates within the budget criteria agreed with its sponsor team and a balanced budget for 2015-16 is currently in place. However, for 2016-17 and beyond the situation is more challenging based upon current commentary for the future funding of the public sector.

4. Governance and Scrutiny

- 4.1 From 1 April 2015 the GLA will move to a reduced governance board of eight independent members plus a Chair, instead of the previous arrangements which was 19 individuals nominated by 15 organisations with interests in the sectors and nine Government departments (including Defra, Home Office and BIS). The GLA also has an Audit & Risk Committee (ARC) and will have other advisory/liaison groups as necessary to ensure a fully inclusive and integrated engagement environment exists between the GLA, its board and the industry. These groups will also offer guidance and recommendations to the main Board thereby enabling it to concentrate on matters of most strategic importance.
- 4.2 The GLA is audited regularly through Government arrangements with Home Office auditors and the National Audit Office, and is accountable to the Home Office, Crime and Policing Group Directorate. The GLA has been the subject of various Government reviews over the recent past, Hampton Report, Macdonald Report, Forestry Task Force, Review of Workplace Rights Compliance and Enforcement (“Davey”), Triennial Review, Comprehensive Spending Review 2010-15 budget settlements and the Government’s Red Tape Challenge (RTC).
- 4.3 In a written statement to Parliament issued on 24 May 2012 Jim Paice, Minister of State for Agriculture and food, set out the agenda for the future. In summary, the Government recognised the continuing need for the GLA to enforce protection for vulnerable workers in its sectors, but indicated that the GLA needed to become better at targeting non-compliant operators and reduce the burden on the compliant. This statement has articulated the following agenda:
- *Ensure the GLA targets suspected serious and organised crime by working more closely with the Serious Organised Crime Authority and other specialist law enforcement agencies;*
 - *Ensure that evidence of worker exploitation by unlicensed gangmasters or licence holders will contribute effectively to continued successful investigation and prosecution of organised crime groups and assist in the earlier identification of the victims of human trafficking;*













- *Reduce the burden on compliant labour providers and labour users and focus forensically on gross abuse of workers by unscrupulous gangmasters – whose crimes include tax evasion, trafficking, health and safety negligence and other serious crimes;*
- *Streamline the process for issuing licences and remove the general requirement for an application inspection and associated fee, aim to reduce fees and charges and extend the licensing period from twelve months to two years or more for highly compliant businesses;*
- *Remove from the scope of the GLA, activities or sectors which are low risk, including:*
 - *Apprenticeships;*
 - *Forestry;*
 - *Cleaning contractors;*
 - *Land agents; and*
 - *Voluntary workers.*
- *Provide for those with exclusive rights to use the seashore for shellfish cultivation to be able to use their workers to grade and gather shellfish stock without needing to be licensed as a gangmaster. This measure would leave fully in scope of the Act activities such as the gathering of cockles from public shellfish beds;*
- *Introduce administrative fines and penalties for low-level and technical minor offences, including a measure similar to a Repayment Order to achieve paid reimbursement to an exploited worker of wages or other payment which has been removed;*
- *Adopt an approach in respect of a labour user who uses an unlicensed gangmaster proportionate to the circumstances of the offence, for example the financial advantage gained and whether or not there has been abuse of the workers; and*
- *Amend the structure of the Board of the GLA and introduce a smaller Board to provide clear strategic leadership and direction to the GLA.*







4.4 From public consultation in 2013 the GLA has modified its approach to a number of functions. These include implementing a discretionary approach to site visits for some licence application inspections. The default position remains that all licence applications will receive a physical site visit unless specific circumstances exist making that unnecessary. Changes to active checks and what appears on the public register have been implemented with the approach to earned recognition being close to finalisation.

4.5 During the debates on the Modern Slavery Bill a clause (77) was added which would require the Secretary of State to publish a paper on the role of the Gangmasters Licensing Authority within a year of Royal Assent. This therefore means that upon enactment, the Home Office will consult publicly on the role, remit and powers of the GLA. The full detail of this review and subsequent consultation is yet to be established.








5. Current Landscape

5.1 End of year 2014-15 performance status by outcome:

	Achieved	Exceeded	Not achieved
Increase by 15 per cent year on year the number of actual and potential victims of labour exploitation identified, and given support to remove them from danger/raise awareness of their rights			
Increase by 20 per cent year on year the identified criminal profits from GLA investigations and joint investigations, for consideration of seizure of proceeds of crime through unlawful activity within the sector			
Increase by 15 per cent year on year the number of referrals (successfully identified as victims) made to the UK Human Trafficking Centre (UKHTC) (National Referral Mechanism (NRM) referrals)			
Increase by 15 per cent year on year referrals of the identification and activity of organised crime groups (OCG) to Law Enforcement Regional Organised Crime Units (ROCU)			
Increase by 10 per cent the identification of workers' unpaid holiday pay, breaches of national minimum wage and enforcement of breaches of employment standards/statutory employment rights			
Increase by 20 per cent year on year the assistance given to labour users/providers in the co-identification of and dealing with potential worker exploitation prior to formal regulatory engagement			

	Achieved	Exceeded	Not achieved
To develop closer working relationships with HMRC, Health and Safety Executive (HSE), NCA, Local Authorities and law enforcement agencies through joint operations rising by 25 per cent year on year			
Improve the satisfaction of licence holders with the service provided by the GLA to 85% in year one and reviewed/revised thereafter (2013-14 baseline = 83%)			
Improve perception amongst all key stakeholders that the GLA is doing a good or very good job to 80% in year one and reviewed/revised thereafter (2013-14 baseline = 87.3%)			

5.2 Single Year 2014-15 Outcomes

	Achieved	Exceeded	Not achieved
By March 2015 to have reviewed the GLA Licensing Standards to ensure that they best support the Authority's strategic aim			
By March 2015 to have identified the full range of alternative and cost effective solutions for the GLA to take full ownership of its own ICT infrastructure			
By March 2015 to implement the Triennial Review recommendations			
By March 2015 to develop, through innovation, sustainable funding streams to enhance and support the future development of the GLA			
By March 2015 to fully embed/implement all RTC recommendations			
By January 2015 to have improved the stakeholder survey response rate to 15%			
By January 2015 to have improved the licence holder survey response rate to 15%			

- 5.3 Overall, performance has exceeded the targets set against a backdrop of a 200% increase in output, brought about by a marked increase in involvement in and investigation of labour exploitation. This additional enforcement activity has not, nor would be in any way, to the detriment of licensing and compliance functions.
- 5.4 As systems and processes have been refined the 16 high level performance targets and 39 sub-measures for 2014 -15 have translated into targets for this year, being, 17 corporate targets and 39 sub-measures.

6. Operational Activity

- 6.1 The GLA has a dual role to discharge, that of reporting and measuring against civil regulations, 'the standards' and also preventing and detecting breaches of criminal law contained within the Act. The Authority is an intelligence led organisation and much of its work is based on the information it receives from many and varied open and closed sources, how it risk assesses and develops that information and what action it then takes either as a single inspectorate or jointly with other agencies.
- 6.2 Since the inception of the GLA in 2006, 2,614 gangmasters licences have been issued and there are 954 current licences designed to protect circa 700,000 temporary workers.
- 6.3 For the year 2014 -15 82 new licences were granted, 99 compliance inspections conducted and 23 licences have been revoked. The revocations were all for serious breaches of the GLA licensing standards and/or committing criminal offences. We have conducted enquiries and investigations throughout the UK but most notably in the Eastern region of England, the South East coast, West and East Midlands. Operation Mater was a preventative GLA led partnership initiative designed to protect temporary workers involved with flower picking. This operation has been a resounding success and has preceded workers travelling up the country and into Scotland with the intention of preventing exploitation from taking a hold in this short term, high volume, temporary season.
- 6.4 Furthermore, arising out of the abolition of the Seasonal Agricultural Workers Scheme in 2014, we mounted Operation Novalis, which saw over 300 farms visited or contacted to offer support, guidance and assistance and to help resolve any residual issues resulting from the relaxation of employing workers from Bulgaria and Romania.
- 6.5 We maintained strong financial management discharging all our responsibilities within budget and on time. This includes delivering the annual savings target set by the Home Office.
- 6.6 We continue to listen to feedback from our customers and stakeholders and in this reporting period we conducted surveys for licence holders and for wider stakeholders which returned satisfaction figures of 86% per cent and 93.6 per cent respectively. Whilst these are very good statistics we are accelerating our ambitions for 2015-16 and raising the targets for both satisfaction and response

rates to ensure that we demonstrate that we listen intently to our customers and respond to their needs.

- 6.7 In addition, during the year, we will conduct a worker survey where it is hoped to establish the issues that concern workers most and how the GLA can do more to protect workers and eradicate exploitation in the industry.
- 6.8 During 2013-14 we also introduced social media accounts in relation to twitter and Facebook and have developed our regular newsletter, which has been well received. This has been built on during 2014-15 and we are now receiving unprecedented hits on our social media accounts.
- 6.9 Key achievements this year have included:
- Direct intervention on behalf of 3,064 workers to protect them from exploitation
 - Steps to recover over £3.5 million on behalf of workers being exploited financially
 - The identification of over £5.1 million in proceeds of crime including vehicles, properties
 - 779 potential victims of labour exploitation have been identified and given support to remove them from danger
 - Regulating the labour supply in an industry worth £100 billion with a budget of 0.004 per cent of that amount
 - 82 licences granted, 22 refused, 23 revoked
 - 22 convictions and 15 pending trial
 - 32 organised crime groups identified/disrupted
- 6.10 The GLA therefore continues to work closely with all partners in its regulated sector and recently held its inaugural national conference inviting every licenced gangmaster in the UK. The event was hugely oversubscribed and together with suppliers, retailers, law enforcement partners and academics listened to and interacted with the Modern Slavery Minister, Karen Bradley MP, the Independent Anti-Slavery Commissioner, Kevin Hyland OBE, and other prominent speakers. Comments received have been overwhelmingly supportive, and feedback as to the review of the GLA Licensing Standards, the GLA strategy and other issues were sought. Large parts of the industry have asked for a follow up conference in the autumn.
- 6.11 Throughout the year, the GLA is identifying more serious crime and abuse. Contained within some of those criminal investigations there is evidence of organisation within and between organised crime groups, degrees of unlawful facilitation into the UK on the promise of work, decent wages and a better life. This can range from individuals who answer advertisements in their own country of offers of work, pay to enter the UK from European Union (EU) or non-EU countries, which are then financially indebted to their 'master', through to the use of threats of physical or psychological violence, financial bondage, forced labour and, in extreme cases, human trafficking for the purposes of forced labour.

- 6.12 The GLA works closely with law enforcement and has staff embedded into a number of police force intelligence bureaux and regional organised crime units across the UK to enable a deeper understanding of the signs and symptoms of labour exploitation at an early stage. GLA staff are formally identified as Human Trafficking 'first responders'. This means they have the responsibility to consider taking the necessary steps to safeguard the welfare of any potential victim of trafficking. All current reports and thinking on these matters suggest that human trafficking, for the purposes of forced labour, is a rapidly growing trend.
- 6.13 The GLA continues to work closely with the public, private and third sector, particularly charities such as the Salvation Army, Migrant Help and Victim Support whose services have been utilised on a regular basis to assist with the protection of vulnerable people once they have been extracted from the forced labour environment.
- 6.14 GLA executive are members of the National Organised Immigration Crime Threat Board which contributes to the UK Threat Assessment overseen by the Home Secretary, various Ministerial groups, public, private and voluntary sector forums. Members of the GLA are also key contributors to other high level networks, locally, nationally and internationally.

7. Strategic Aim, Priorities and Outcomes 2015 – 2018

- 7.1 The GLA has consulted widely on its aim, priorities and outcomes. Most recently it has taken feedback from its outgoing governance board and also a wide range of key stakeholders including those at its conference in March 2015. The following takes into account those comments.
- 7.2 The GLA has a very clear aim:
- 'Working in partnership to protect vulnerable and exploited workers'
- 7.3 This aim will be achieved through the delivery of three straightforward priorities:
- Preventing worker exploitation
 - Protecting vulnerable people
 - Tackling unlicensed/criminal activity and ensuring those licensed operate within the law
- 7.4 To effectively measure success in these vital areas of activity there are six strategic outcomes that all staff contribute to, are assessed against and which are continuously reviewed and evaluated to ensure the overarching aim is met.

- One Target, dismantle and disrupt serious and organised crime/early identification of human trafficking
- Two Provide effective, meaningful engagement with stakeholders thereby enhancing reputation
- Three Work with industry to recognise and address non-compliance without formal GLA intervention
- Four Tackle tax evasion, health and safety negligence, fraud, breaches of employment and other law/regulations
- Five Maintain credible licensing scheme creating level playing field and promoting growth
- Six Identify and tackle forced/bonded labour by licensed and unlicensed gangmasters

7.5 The above aims, priorities and outcomes are also illustrated in Appendix A below.

Values

7.6 The GLA 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's done. Its values are shared by all members of the organisation and are the foundations that underpin the delivery of the aim, priorities and outcomes.

7.7 The GLA will, in everything it does, at all times, demonstrate its PROUD principles:

- P** Professional
- R** Respect
- O** One team
- U** Utmost integrity, trust, openness
- D** Doing it differently

7.8 In addition, staff will continue to hold each other to account to continually demonstrate their commitment to the principles, in order to maintain and enhance the strong reputation the GLA has gained over time. Should anyone in their contact with the GLA believe that the service provided has fallen short of these standards then the Chief Executive personally would like to hear about it. In the annual staff survey, 97% of staff were proud to work for the GLA and 100% of staff understood what is expected of them in their role.

8. Delivering the Plan 2015 - 18

- 8.1 Working in partnership to protect vulnerable and exploited workers is dependent upon a clear framework for delivery underpinned by sustained performance under any climate. The framework includes:
- Strong governance
 - Effective performance 'grip' and accountability
 - Robust financial management
 - A professional workforce
- 8.2 The framework will enable the organisation to realise continuous improvement in service delivery and to meet the demands of the 21st century. Hence the GLA will deliver its aim through a framework of four strategic programmes, all led by an executive member, accountable to the Chair and GLA governance boards with specific, measurable, time limited, realistic yet stretching outcomes.
- 8.3 The four strategic programmes are listed below and will include, but not be limited to, the subjects within each heading. The subjects will obviously develop over the course of the plan, and upon completion no doubt new and emerging themes will take their place.
- 8.4 A number of the subjects are cross cutting both internally and for other agencies but by setting a clear path for delivery, the GLA has a desire to constantly improve, be transparent in what it does, how and why, and also provide the most effective and efficient service possible by any NDPB/law enforcement agency.
- 8.5 The common theme running through these programmes is that the GLA will demonstrate in all it delivers that there is proportionate yet robust grip, relentless follow up to ensure delivery and a forensic attention to detail to reassure all who come into contact with the GLA that it will deliver against its aim, priorities and outcomes.

Strategic programmes

Prevent

- GLA labour exploitation (Lex) prevention plan which incorporates all prevent, protect, pursue, prepare activities from the modern slavery strategy and its associated action plan
- Collaborative/integrated working with other agencies, bodies to prevent and identify any erosion of workers' rights
- Threat and risk based approach– development of improved structure to ensure effective deployment of resources
- Intelligence led – National Intelligence Model (revised) compliance
- Use of intelligence to identify emerging trends
- In target non-compliant – reduce the burden on the compliant
- Problem Profile – All agencies
- Stifle unscrupulous labour users/providers
- OCG Mapping, disrupt, dismantle
- Tackle criminality

Productivity

- Value for money – workforce planning, procurement, asset management
- Audit and compliance – targeted to provide greater insight
- Inspections, reviews, formal feedback
- Governance
- Compliance/enforcement – individual, team, partnership
- Outcomes led – Not target driven
- Value for money profiles – Comparisons, in sourcing, business partnering
- Outcomes and outputs
- Income generation, business growth, policy review, communication
- Joint performance measures

People

- Leading authority
- High performance
- Recruit and develop
- Inspire and motivate
- Reward and recognition
- Policies and processes
- Equality and diversity

Partnerships

- Key stakeholders, Industry
- GLA/ETI/University of Derby training academy
- Workers, communities
- Communication
- Community intelligence
- Self & co-regulation by legitimate trade
- Law enforcement partners
- Government departments to include devolved administrations
- Joint tasking, joint threat/intelligence assessments
- Service level agreement and information sharing protocols with all key agencies, locally, nationally internationally
- Academia – research, emerging trends, local, national, international
- Europol – speedier intelligence exchange
- Retailer/supplier protocol
- Overseas labour inspectorates
- ILO and IOM

Key Performance Indicators

- 8.6 The following performance indicators, targets and outcomes are designed to improve performance in relation to the issues which are of greatest concern. Each target will have an annual sub set of targets/indicators to ensure consistent and continuous monitoring and evaluation of activity and progress is maintained throughout the reporting period. The headline performance targets, supported by the specific indicators will then measure tangible progress against the six organisational outcomes leading to demonstrating activity against the three strategic priorities and the single Aim.

- 8.7 Some of the targets will be modified from time to time to reflect emerging trends in worker exploitation, however, the principle of performance improvement measured against time, trends and peers (where applicable) will remain.
- 8.8 Improvements will be measured and evaluated year on year against the 2012-13 baseline. They will be analysed over one, three and where possible five year periods to enable meaningful interpretation and will be based upon accurate data and analysis, supported by robust systems and structures, driven by staff with the necessary expertise and skill to maximise the function.
- 8.9 Performance against targets will be reported to each and every GLA full Board to ensure oversight, scrutiny and governance.

Delivery Plan Targets 2015-18

- ❖ Increase by 10% the identification of workers unpaid holiday pay, breaches of national minimum wage and enforcement of breaches of employment standards/statutory employment rights.
- ❖ Increase by 15% year on year the number of actual and potential victims of labour exploitation identified, and given support to remove them from danger/raise awareness of their rights.
- ❖ Increase by 10% year on year the identified criminal profits from GLA investigations and joint investigations, for consideration of seizure of proceeds of crime through unlawful activity within the sector.
- ❖ Monitor and maintain year on year the number of referrals (successfully identified as victims) made to the UK Human Trafficking Centre (NRM referrals).
- ❖ Monitor and maintain year on year referrals of the identification and activity of Organised Crime Group to Law Enforcement regional organised crime units (ROCUs).
- ❖ Increase by 20% year on year the assistance given to labour users/providers in the co-identification of and dealing with potential worker exploitation prior to formal regulatory engagement.
- ❖ To develop closer working relationships with HMRC, HSE, NCA, Local Authorities and law enforcement agencies through monitor and maintaining the number of joint operations year on year.
- ❖ Monitor and maintain the satisfaction of licence holders with the service provided by the GLA at 86%.
- ❖ Monitor and maintain the perception amongst all key stakeholders that the GLA is doing a good or very good job at 93%.

The following three objectives are those actions the GLA is leading on behalf of the national modern slavery strategy.

- ❖ Work with the regulated sectors to raise standards of worker treatment through the entire supply chain.
- ❖ Provide expert witness evidence and impact statements to law enforcement organisations undertaking investigations into labour exploitation.
- ❖ Develop partnerships with other enforcement bodies across Europe focussed on the sharing of information, emerging trends, best practice as well as conducting joint operations to prevent exploitative practices.

8.10 Within year 2015 - 16

- ❖ By March 2016 to have implemented the GLA Licensing Standards to ensure that they best support the Authority's strategic aim, priorities and outcomes.
- ❖ By January 2016 to have improved the stakeholder survey response rate to 10% more than 2015 levels.
- ❖ By January 2016 to have improved the licence holder survey response rate to 10% more than 2015 levels.
- ❖ By May 2015 to have made appropriate plans for briefing of any change in governmental administration.
- ❖ By September 2015 to present alternative sustainable funding models for consideration by the Home Office.

8.11 All GLA staff will have and own specific personal and professional objectives designed to meet the needs of vulnerable and exploited workers and inextricably linked to this delivery plan.

9. Risk Management

9.1 Managing risk in all aspects of the work of the GLA is critical to ensuring that a consistently high level of service is delivered. Risk management is about identifying the risks to vulnerable and exploited workers within the GLA sector, evaluating those risks and deciding on the best course of action to address them. Therefore this organisation has a risk management strategy which is the framework for identifying and evaluating these risks.

9.2 By continuously reviewing and evaluating the information and intelligence that is gathered from a wide range of open and covert sources, assessing the likelihood, probability and impact of that information and the risks that are identified, the GLA is able to take effective and proportionate action to protect people from being vulnerable and exploited. This cannot and does not occur in isolation from other agencies, sectors and the industry itself and the GLA seeks at every opportunity to engage with the labour user/provider and workers themselves to prevent exploitation in all its forms.

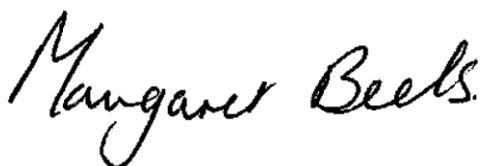
9.3 In addition, the GLA is also accountable to the ARC which critically examines and holds the authority to account for the management of all organisational, operational, financial and associated risks, assessing each identified corporate risk against likelihood, impact and also volatility and also setting the Authority's 'appetite' for risk in those areas. Success of the GLA strategy is predicated on the effective management of corporate risks for example: ongoing strategic and operational interagency cooperation, the quality and quantity of intelligence and evidence of exploitation, the capacity and capability of the GLA and its leadership to effectively deliver the strategy.

10. Summary

- 10.1 This strategy for 'Protecting vulnerable and exploited workers 2015 - 18' seeks to illustrate a clear framework by which the GLA will improve its performance, enhance confidence and satisfaction and most importantly create a platform where the exploitation of workers can be identified at an early stage and prevented.
- 10.2 In so doing, the activity of the GLA will be harnessed through a simple delivery plan that is both transparent and open to scrutiny, will be continually reviewed, evaluated and assessed both internally and through the various governance structures and ultimately by the industry that the GLA regulates.
- 10.3 This strategy, aim, priorities and outcomes will be formally reviewed bi-annually by the GLA full Board and other stakeholder groups including members from Government departments, labour providers and users, trade unions and other interested parties to ensure worker exploitation is being prevented, they are being protected and that unlicensed activity is being addressed and those operating within the regulations continue to be compliant. This will be achieved whilst easing the burden on the compliant and enabling national economic growth.
- 10.4 Feedback is greatly appreciated and further explanation as to any aspect of this strategy can be given by contacting:

communications@gla.gsi.gov.uk

Tel: 0345 602 5020



Margaret Beels
Chair



Paul Broadbent
Chief Executive

Strategy for Protecting Vulnerable and Exploited Workers 2015-18

