



Gangmasters
Licensing Authority

GLA40/9.2 Survey of Stakeholders Results

15 January 2014

Board Paper Reference – GLA40/9.2 - Survey of Stakeholders Results

1. Purpose of the Report

- 1.1. This paper presents the results of the survey of key stakeholders.

2. Recommendation

- 2.1. The Board is invited to note this paper.

3. Background

- 3.1. The GLA Strategy for Protecting Vulnerable and Exploited Workers 2013-16 includes a delivery plan target to:

Improve perception amongst all key stakeholders that the GLA is doing a good or very good job by 10 per cent year on year

- 3.2. The GLA surveyed key stakeholders between 5 November and 6 December 2013 to determine perceptions of how well the GLA is performing by those with a strategic and high level interest in the Authority's work. The survey was structured around the GLA's strategic aim, priorities and objectives. A copy of the survey is at annex A.
- 3.3. A list of stakeholders surveyed and who responded is at annex B. Eight responses were received from 61 surveys invites sent out (a response rate of 13 per cent)
- 3.4. The recent Licence Holder Satisfaction Survey focused on how licence holders rate their experience with dealing with the GLA. The survey of stakeholders is more strategic in its focus and seeks to determine perceptions of how well the GLA is performing by those with a strategic and high level interest in the Authority's work. The survey is structured around the GLA's strategic aim, priorities and objectives.

4. Summary of Responses

- 4.1. Annex C presents the results from the survey. Given the low number of responses, it is difficult to make any meaningful conclusions. However, in summary:

Types of respondent

- 4.2. Three respondents represented 'labour providers', three respondents represented 'labour users' and three represented 'other' types of organisation (two academics, one retailer). Disappointingly, no organisation representing the workers responded.

Targeting, dismantling and disrupting serious and organised crime

- 4.3. 67 per cent of respondents consider the GLA to be 'Good' or 'Very Good' at targeting, dismantling and disrupting serious and organised crime.

Early identification of human trafficking

- 4.4. 67 per cent consider the GLA to be ‘Good’ or ‘very good’ at the early identification of human trafficking.

Identifying and tackling forced/bonded labour

- 4.5. 67 per cent consider the GLA to be ‘Good’ or ‘Very good’ at identifying and tackling forced/bonded labour.

Identifying and tackling unlicensed activity

- 4.6. 67 per cent consider the GLA to be ‘Good’ or ‘Very good’ at identifying and tackling unlicensed activity.

Engaging with stakeholders

- 4.7. 67 per cent consider the GLA to be ‘Good’ or ‘Very good’ at engaging with stakeholders.

Tackling tax evasion, health and safety negligence, fraud, breaches of employment and other law/ regulations

- 4.8. 67 per cent consider the GLA to be ‘Good’ or ‘Very good’ at tackling tax evasion, health and safety negligence, fraud, breaches of employment and other law/ regulations.

Licensing scheme credibility

- 4.9. 100 per cent consider the GLA licensing scheme to be credible.

Creating a level playing field

- 4.10. 60 per cent consider the GLA is ‘Successful’ or ‘Very successful’ in creating a level playing field.

Improving the conditions of workers

- 4.11. 78 per cent consider the GLA is ‘Good’ or ‘Very good’ at improving the conditions of workers.

Delivering strategic aim

- 4.12. 78 per cent consider the GLA is ‘Good’ or ‘Very good’ at delivering its strategic aim of “Working in partnership to protect vulnerable and exploited workers”.

5. Background Papers and Relevant Published Documents

- 5.1. Related document:

- GLA Strategy for Protecting Vulnerable and Exploited Workers 2013-16

Report Author: David Nix

Annex A – Copy of Stakeholder Survey

Part One

The following questions ask about the organisation you represent as well as your knowledge of the GLA

Name:

Position:

Organisation:

1. Do you represent the interests of:

	Labour Providers <input type="checkbox"/>	Labour Users <input type="checkbox"/>
	Workers <input type="checkbox"/>	Others (please state) <input type="checkbox"/>

2. Please explain why you have an interest in the work of the GLA:

3. How regularly do you have direct contact with the GLA?

4. We want to find out how well our stakeholders understand what the GLA does. Please answer the following questions and rate your existing knowledge

(a) How well do you understand who needs a licence?

	I have a very good understanding <input type="checkbox"/>	I have reasonable understanding <input type="checkbox"/>
	I have a limited understanding <input type="checkbox"/>	Do not know <input type="checkbox"/>

(b) The GLA Licensing Standards set out the conditions of a GLA licence. Please tick the areas you knew were covered by the Standards:

Standard area	I knew this was covered in the Standards	I did not know this was covered in the Standards
Fit and Proper Test	<input type="checkbox"/>	<input type="checkbox"/>
Tax Matters	<input type="checkbox"/>	<input type="checkbox"/>
Pay (including NMW, withholding wages and payslips)	<input type="checkbox"/>	<input type="checkbox"/>
Physical and Mental Mistreatment	<input type="checkbox"/>	<input type="checkbox"/>
Debt Bondage	<input type="checkbox"/>	<input type="checkbox"/>
Working Time	<input type="checkbox"/>	<input type="checkbox"/>
Discrimination	<input type="checkbox"/>	<input type="checkbox"/>
Trade Union Rights	<input type="checkbox"/>	<input type="checkbox"/>
Health and Safety	<input type="checkbox"/>	<input type="checkbox"/>
Transport	<input type="checkbox"/>	<input type="checkbox"/>
Gathering Shellfish	<input type="checkbox"/>	<input type="checkbox"/>
Job-Finding Fees	<input type="checkbox"/>	<input type="checkbox"/>
Right to Work	<input type="checkbox"/>	<input type="checkbox"/>
Worker and Labour User Terms and Conditions	<input type="checkbox"/>	<input type="checkbox"/>
Using Other Labour Providers	<input type="checkbox"/>	<input type="checkbox"/>

(c) Do you know what action the GLA can take for non-compliance with the Licensing Standards? Please tick the options you were aware about:	Refuse an application	<input type="checkbox"/>	Revoke a licence	<input type="checkbox"/>
	Suspend a licence	<input type="checkbox"/>	Issue a licence with specific conditions to improve compliance	<input type="checkbox"/>
	Issue a provisional licence	<input type="checkbox"/>	Issue fines	<input type="checkbox"/>
	Prosecute	<input type="checkbox"/>	Do not know	<input type="checkbox"/>
(d) Do you know what criminal offences the GLA can investigate? Please tick the offences you were aware about:	Acting as a gangmasters without a licence	<input type="checkbox"/>	Using an unlicensed gangmaster	<input type="checkbox"/>
	Obstructing a GLA officer	<input type="checkbox"/>	Do not know	<input type="checkbox"/>
(e) The GLA published its Strategy for Protecting Vulnerable and Exploited Workers in June 2013. Please read the following statements and tick the applicable answer:	I knew the Strategy had been published and understand what is covered	<input type="checkbox"/>	I knew the Strategy had been published but do not know what is covered	<input type="checkbox"/>
	I did not know the Strategy had been published	<input type="checkbox"/>		

Part Two

This part of the survey asks questions about how well you think the GLA is performing against its strategic aim, priorities and objectives.

The GLA's aim is "Working in partnership to protect vulnerable and exploited workers". This aim will be achieved through three priorities:

- Preventing worker exploitation
- Protecting vulnerable people
- Tackling unlicensed / criminal activity and ensuring those licensed operate within the law

The GLA has six objectives to deliver its aim and objectives:

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

Tackling Serious and Organised Crime and Unlicensed Activity

5. How would you rate the GLA at targeting, dismantling and disrupting serious and organised crime	Very good	<input type="checkbox"/>	Good	<input type="checkbox"/>
	Poor	<input type="checkbox"/>	Very poor	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

6. How would you rate the GLA with the early identification of human trafficking?	Very good	<input type="checkbox"/>	Good	<input type="checkbox"/>
	Poor	<input type="checkbox"/>	Very poor	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

7. How would you rate the GLA at identifying and tackling forced / bonded labour?	Very good	<input type="checkbox"/>	Good	<input type="checkbox"/>
	Poor	<input type="checkbox"/>	Very poor	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

8. How would you rate the GLA at identifying and tackling unlicensed activity?	Very good	<input type="checkbox"/>	Good	<input type="checkbox"/>
	Poor	<input type="checkbox"/>	Very poor	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

Working in Partnership

9. How would you rate the GLA for engaging with stakeholders?	Very good	<input type="checkbox"/>	Good	<input type="checkbox"/>
	Poor	<input type="checkbox"/>	Very poor	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

Licence Scheme Credibility and Maintaining Compliance

10. How would you rate the GLA at tackling tax evasion, health and safety negligence, fraud, breaches of employment and other law / regulations?	Very good	<input type="checkbox"/>	Good	<input type="checkbox"/>
	Poor	<input type="checkbox"/>	Very poor	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

11. How credible do you think the GLA licensing scheme is?	Very credible	<input type="checkbox"/>	Credible	<input type="checkbox"/>
	Limited credibility	<input type="checkbox"/>	No credibility	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

12. How successful do you think the GLA is in creating a level playing field for compliant businesses to operate?	Very successful	<input type="checkbox"/>	Successful	<input type="checkbox"/>
	Unsuccessful	<input type="checkbox"/>	Very unsuccessful	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

Protecting Workers

13. How would you rate the GLA at improving the conditions of workers?	Very good	<input type="checkbox"/>	Good	<input type="checkbox"/>
	Poor	<input type="checkbox"/>	Very poor	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

14. Overall, how would you rate the GLA at delivering its strategic aim of "Working in partnership to protect vulnerable and exploited workers"?	Very good	<input type="checkbox"/>	Good	<input type="checkbox"/>
	Poor	<input type="checkbox"/>	Very poor	<input type="checkbox"/>
	Do not know	<input type="checkbox"/>		
	Please explain your answer:			

General Question

15. Do you have any additional comments?	
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Thank you for completing the survey

Annex B

Stakeholders surveyed:

50 Club Horticultural Employers' Association
Agriculture and Horticulture Development Board
Aldi
Anti-Slavery International
Asda
Association of Chief Police Officers
Association of Labour Providers
Association of Professional Staffing Companies
Boots
British Carrot Growers' Association
British Egg Industry Council
British Growers Association
British Poultry Council
British Red Cross
British Retail Consortium
British Summer Fruits
CAB
Co-operative Group
Ethical Trading Initiative
Farmers' Union of Wales
Federation of Poles in Great Britain
Food and Drink Federation
Food Ethics Council
Forced Labour Monitoring Group, University of Durham
Fresh Potato Suppliers Association
Fresh Produce Consortium
Gangmasters Alliance
GMB
Iceland
Institute for Conflict Research
Joseph Rowntree Foundation
Lidl
Local Government Association
Local Government Regulation
Low Pay Commission
Machinery Ring Association of England and Wales
Marks and Spencer
Migrant Helpline
Migrants Rights Network
Morrisons
National Association of Agricultural Contractors
National Farmers Union
NFU Cymru
NFUS
Oxfam

Police Superintendents Association
Recruitment and Employment Confederation
Sainsbury's
Salvation Army
Sea Fish Industry
Shellfish of Great Britain Association
Shelter
Tesco
TUC
UK Human Trafficking Centre
Ulster Farmers Union
Unite the Union
USDAW
Waitrose
Wilberforce Institute for the Study of Slavery and Emancipation
Working Lives Research Institute

Responses received from:

1. Association of Labour Providers
2. Forced Labour Monitoring Group, University of Durham
3. Fresh Produce Consortium
4. National Farmers Union
5. NFU Scotland
6. Recruitment and Employment Confederation
7. Ringlink Services Ltd
8. Waitrose
9. Wilberforce Institute for the Study of Slavery and Emancipation

Annex C – Results of Stakeholder Survey

Part One

Questions about the organisation responding and existing knowledge of the GLA

Question 1: Do you represent the interests of:

Type of organisation	Number of responses received
Labour Providers	3
Labour Users	3
Workers	0
Other	3
Total	9

Of the nine responses received, five were from GLA Board members.

Question 2: Please explain why you are interested in the work of the GLA

One respondent indicated they had an academic interest in slavery and forced labour issues. Another stated that it wants to ensure its suppliers are reputable GLA licensed labour providers, there is no exploitation in its supply chain and that they believed the GLA plays an important role in monitoring and improving labour provision standards.

Question 3: How regularly do you have direct contact with the GLA?

Frequency of contact	Number of responses
Weekly/ Regularly	4
Twice a month	1
Bi-monthly	1
Periodically/ Not regularly/ Rarely	3

Question 4(a): How well do you understand who needs a licence?

Answer	Number of responses
Very good understanding	7
Reasonable understanding	2
Limited understanding	0
Do not know	0

Two Labour user respondents indicated they had a 'reasonable understanding' for who needs a GLA licence. The other respondents all indicated they had a 'very good understanding'.

Question 4(b): The GLA Licensing Standard set out the conditions of a GLA licence. Please tick the areas you know were covered by the Standards.

Standard Area	Number who knew it was covered	Number who did not know it was covered
Fit and Proper Test	9	0
Tax Matter	8	0
Pay (including NMW, withholding wages and payslips)	9	0
Physical and Mental Mistreatment	9	0
Debt Bondage	9	0
Working Time	9	0
Discrimination	8	1 <i>(1 'other' representative organisation)</i>
Trade Union Rights	6	3 <i>(1 'labour user' organisation, 2 'other')</i>
Health and Safety	9	0

Transport	9	0
Gathering Shellfish	8	1 <i>(1 'labour user' organisation)</i>
Job-Finding Fees	7	2 <i>(1 'labour user' organisation, 1 'other')</i>
Rights to Work	8	1 <i>(1 'labour user' organisation)</i>
Worker and Labour User Terms and Conditions	9	0
Using Other Labour Providers	9	0

Question 4(c): Do you know what action the GLA can take for non-compliance with the Licensing Standards?

Answer	Number of responses
Refuse an application	9
Revoke a licence	9
Suspend a licence	8
Issue a licence with specific conditions to improve compliance	9
Issue a provisional licence	3
Issue fines	5
Prosecute	8
Do not know	0

Please note: the GLA does not issue provisional licences and does not have the power to issue fines and prosecute for Licensing Standards breaches.

Question 4(d): Do you know what criminal offences the GLA can investigate?

Answer	Number of responses
Acting as a gangmaster without a licence	9
Using an unlicensed gangmaster	8
Obstructing a GLA officer	8
Do not know	0

1 labour user representative did not it was an offence to use an unlicensed gangmaster.

Question 4(e): The GLA published its Strategy for Protecting Vulnerable and Exploited Workers in June 2013. Please read the following statements and tick the applicable answer

Answer	Number of responses
Knew the Strategy had been published and understand what is covered	8
Knew the Strategy had been published but do not know what is covered	0
Did not know the Strategy had been published	1

1 'other' representative organisation did not know that did know the Strategy had been published.

Part Two

Question 5: How would you rate the GLA at targeting, dismantling and disrupting serious and organised crime?

Answer	Number of responses
Very good	2
Good	4
Poor	1
Very poor	0
Do not know	2

Comments provided:

“Good on a limited basis, lack of budget and therefore resources restrict the GLA’s impact”.

“I do not think the GLA has sufficient resources ... I think the GLA can increase it’s [sic] effectiveness in this area through working more closely with it’s [sic] stakeholders, including government (including the police and the National Crime Agency)”.

“Improving would be the better answer. I think the true extent of organised criminality, forced labour and trafficking is only just becoming clear. GLA action to combat it thus far very encouraging, and we have every faith that in time the GLA, in partnership with key stakeholders, will be successful ... That said, it is too early to make long term judgements ... additionally, it is concerning that this problem has been able to develop to the extent it has while the licensing regime has been in place”.

“The GLA is viewed by most of us as doing a reasonably good job but it is hampered from doing a better job by decreasing resources (from an already low level), a huge area to cover with limited staff, a continuing lack of understanding by other potential partners, and a limited remit which allows many potential offenders to escape detection”.

“This is a newly established objective for the GLA ... Impressions are that the GLA is effective but [the respondent] does not have enough knowledge to rate the GLA or understand the criteria against which to judge this”.

Question 6: How would you rate the GLA with the early identification of human trafficking?

Answer	Number of responses
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Very good	1
Good	5
Poor	1
Very poor	0
Do not know	2

Comments provided:

“Good on a limited basis, lack of budget and therefore resources restrict the GLA’s impact”.

“Although GLA investigations may uncover human trafficking, I have not been aware of any instances where the GLA has been involved in the early identification of human trafficking. However, this may be because the GLA has not shared this information with our company”.

“It is interesting to note that the UKHTC data shows an increasing proportion of cases referred to the NRM are for labour exploitation and we suspect the GLA cases represent a small proportion of the total which might be covered by its work”.

“As far as is understood, GLA officers are aware of the indicators that identify potential victims of human trafficking ... It is unclear what criteria to use to rate the GLA on this matter ... Further information is required on the initiatives being undertaken by the GLA to enable the early identification of human trafficking”.

Question 7: How would you rate the GLA at identifying and tackling forced / bonded labour?

Answer	Number of responses
Very good	2
Good	4
Poor	1
Very poor	0
Do not know	2

Comments received:

“Good on a limited basis, lack of budget and therefore resources restrict the GLA’s impact”.

“The GLA’s investigations have been successful in indentifying forced/bonded labour. However, I think it needs to try to increase it’s [sic] scale and reach in order to identify more instances of forced/bonded labour. This could be done through more effective communication and partnerships with stakeholders. I think many more investigations are needed in order to identify and tackle instances of forced/bonded labour”.

One respondent answered ‘Poor’ and commented *“this grading is given on the basis that there are very few cases of forced labour coming before the courts at present which of course is not solely the responsibility of the GLA. We would like to see better guidance to the judiciary and the police, better information for potential partners and clarification of the general nature of forced labour and indicators of its existence to be made publically available”.*

“It is unclear what criteria to use to rate the GLA on this ... [The respondent] believes that the GLA processes for tackling forced/bonded labour once identified are robust ... Further information is required on the initiatives being undertaken by the GLA to enable the early identification of forced / bonded labour ... Further guidance is needed on what categorises bonded labour particularly in light of recent case law”.

Question 8: How would you rate the GLA at identifying and tackling unlicensed activity?

Answer	Number of responses
Very good	2
Good	4
Poor	2
Very poor	0
Do not know	1

Comments received:

One respondent answered ‘Poor’ and commented *“Good on a limited basis, lack of budget and therefore resources restrict the GLA’s impact”.*

“This is one of the areas where I feel the GLA is successful”.

“Again, poor is not the ideal answer - there has been significant improvement in this area and we expect that positive trend to continue - but there is no doubt that historically, tackling unlicensed activity has not been a primary focus of the GLA. The result is that there is still a great deal of unlicensed gangmasters operating freely, winning business

from compliant agencies, with little action taken against them, or the clients that use the unlicensed gangmasters, by the government. That has a negative impact on those compliant agencies' view of the GLA”.

“Can be restricted by the amount of intelligence received”.

One respondent answered ‘Poor’ and commented “this is a relative grading, that is, that there are very many cases which the GLA cannot pursue because of its hopelessly unrealistic mismatch between needs and resources”.

“Further information is required on the initiatives being undertaken by the GLA to identify unlicensed operators ... It is unclear how many unlicensed operators the GLA believes are still to be operating in the market ... It is unclear how many unlicensed operators the GLA identifies and tackles each year ... The scope of licensing has yet to be made clear by the GLA. This would assist in alerting those who may be unwittingly supplying into a role or sector covered by licensing ... A targeted communication strategy through various food sector trade bodies might assist ... The criminal process for tackling unlicensed operators would be better replaced by civil penalties in many cases”.

Question 9: How would you rate the GLA for engaging with stakeholders?

Answer	Number of responses
Very good	2
Good	4
Poor	3
Very poor	0
Do not know	0

Comments received:

“Does not do enough to engage with labour users – still seen as the “policeman”. There is a general lack of willingness to report issues to the GLA for fear of being named and shamed in the press”.

“I think much more engagement is needed with stakeholders, including sharing more information on areas of concern, updating on progress and identifying ways stakeholders can help increase the effectiveness of the GLA”.

“As an organisation, we feel we are kept well in the loop on GLA activity”.

“GLA could do more on mass communications with ALL stakeholders, not just supermarkets and a few user representative [sic] groups. It may be an idea to provide a quarterly update to all who have registered for an active check”.

“We have seen GLA staff in many contexts and from our own experience it is clear that staff are willing to engage although clearly the difficult political position the organisation is in makes it unable to engage perhaps as fully as staff and partners would like”.

“The GLA has in general enabled good cross stakeholder engagement ... However, it has engaged with only a limited number of food industry trade associations and some sectors may not be aware of GLA activities as they could be ... There does not appear to have been much recent engagement with worker representative/support organisations”.

Question 10: How would you rate the GLA at tackling tax evasion, health and safety negligence, fraud, breaches of employment and other law / regulations?

Answer	Number of responses
Very good	2
Good	4
Poor	0
Very poor	0
Do not know	3

Comments received:

“I think there is more they could do on communicating their progress in these areas”.

“More could be done to tackle the most aggressive travel and subsistence schemes, but we are now seeing movement there, through the coherent, collaborative approach with HMRC”.

“The GLA has been prepared to tackle these issues and in recent years has demonstrated a broadly sound interpretation of the law ... The GLA should explore and devise a range of mechanisms through which it drives compliance other than through inspections”.

Question 11: How credible do you think the GLA licensing scheme is?

Answer	Number of responses
Very credible	2
Credible	7
Limited credibility	0

No credibility	0
Do not know	0

Comments received:

“Think the GLA's licensing scheme is credible and robust. However, on occasions there has been doubt about the robustness when licensed labour providers are found to not be complying with the standards”.

“To date the licensing scheme seems to have improved worker conditions in most areas”.

“But it needs extending into other industrial sectors”.

“The licensing standards work well ... There is some concern at how many businesses there still are who have held GLA licences for some years and are operating in a significantly non-compliant way”.

Question 12: How successful do you think the GLA is in creating a level playing field for compliant businesses to operate?

Answer	Number of responses
Very successful	2
Successful	4
Unsuccessful	2
Very unsuccessful	0
Do not know	2

Comments received:

“Recent cases have highlighted how unlevel the playing field is”.

“I think the GLA is successful in helping to create a level playing field ... However, from our perspective the issue is that compliance in the GLA regulated sectors may lead to unscrupulous labour providers moving to operate in the non GLA regulated sectors”.

“Between successful and unsuccessful. Historically unsuccessful, but under the new leadership, increasingly successful. The issue of compliant agencies having to compete against unlicensed gangmasters is a real one that does impact on the industry's view of the efficacy of the GLA in creating a level playing field”.

“Where compliance is being met, the playing field, by definition will be level”.

“This is difficult to evaluate. Clearly the GLA has had a number of successes in the cases it has pursued but it is difficult to know what impact this may have had on other businesses. Presumably some legal businesses have been encouraged to behave responsibly, but at the same time some criminal agencies/gangmasters will have gone further underground or transferred their attention to nonregulated sectors”.

“The GLA should consider mechanisms other than compliance inspections to effect change. This should be through a partnership approach with all parties in the supply chain”.

Question 13: How would you rate the GLA at improving the conditions of workers?

Answer	Number of responses
Very good	2
Good	5
Poor	0
Very poor	0
Do not know	2

Comments received:

“Trafficking is on the increase, so the GLA’s message is not reaching all workers. Perhaps more could be done to publicise the GLA’s existence abroad, i.e. let the workers know about the GLA and their powers before they come to the UK”.

“I think the GLA has helped improve the conditions of workers where it has carried out investigations and helped specific workers. However, I think the GLA could do more on raising awareness of what it does, communicating what workers are entitled to and where to go to get help”.

“The GLA's very being as an entity as such, has contributed to the improvement in conditions for workers. However, due to resources, we believe that they are only scratching the surface of some problem areas of the UK”.

“Published data, to our knowledge, does not indicate what impact the GLA licensing regime has had on workers terms and conditions: although this may be difficult given pressure on its resources, more detail on the impact of workers (for example, wage levels before and after regulation) would help to monitor this aspect. Is it possible that a condition of having a licence would be to display publicity material prominently within businesses about the GLA and other relevant agencies such as CABx, the PWR helpline, employment tribunals, HSE etc”.

“The recorded number of workers impacted by the GLAs activities seems to be on the low side for the resources available and the time it has been operating ... The GLA should develop a wider range of measures to improve conditions for workers. These should be developed in collaboration with other stakeholders”.

Question 14: Overall, how would you rate the GLA at delivering its strategic aim of “Working in partnership to protect vulnerable and exploited workers”?

Answer	Number of responses
Very good	2
Good	5
Poor	0
Very poor	0
Do not know	2

Comments received:

“I think the GLA does work in partnership to protect vulnerable and exploited workers. However, I believe some of these partnerships with stakeholders could be strengthened in order to have more of an impact”.

“I think it is too early to properly assess the success of delivering the strategy. 2013 has been about laying the foundations, building the partnerships that will be so central to ensuring the success of the strategy. 2014 will be a very important year in terms of delivery and we'll thus be in a better place to objectively assess the success of that delivery once a bit more time has passed”.

“Partnership working can only be successful where all parties engage in the aims of the strategy. To date, this seems to be working, however, as we will never be able to discover fully the levels of exploitation currently happening, it may be that only the surface is getting scratched. Conversely, it may be that the GLA is uncovering the majority of exploitation and by doing so, are providing an exceptional service to worker, users & providers alike. Unfortunately, I do not think we will ever know”.

“Good within its limited resources:but its impact could be so much greater”.

“This strategic aim is only a few months old and as yet this is too early to tell ... There is now a palpable dynamism and energy to the GLA which has not been apparent for some years ... There are now KPIs in place which have never existed before ... There is now an improved communication strategy in place - PR stories should be emailed to licence holders ... Signs are positive that the GLA will continue to improve in delivering its strategic aim”.

Question 15: Do you have any additional comments?

Comments received:

“Overall I am very impressed by the staff on the ground at the GLA, they are obviously very committed to their job”.

“The GLA is highly effective ... but there are key areas over which it has no jurisdiction ... For the GLA to meaningfully tackle the enormous scale of exploitation, it needs to have its role expanded into all areas of temporary labour. There should be a concomitant increase in LA staffing”.

“Needs to prove performance”.

“I think the GLA needs to consider the reputation issues of compliant businesses, when undertaking investigations. I also think more work needs to be done on improving the working relationship between retailers, suppliers and the GLA and how information is shared. This is particularly the case when press are involved in investigations. It needs to be made clear when press are involved in an investigation, in order for retailers and suppliers to effectively manage communication internally and deal with any media enquiries etc. We need to ensure the Protocol is adhered to by suppliers, retailers and the GLA and it is amended over time, as necessary. I also think the GLA needs to be very specific about the sectors it regulates. On the website there is sometimes conflicting information about whether the drinks processing industry is covered, for example”.

“We hope that the proposed modern day slavery bill proposed to come before Parliament will take full notice of the issue of forced labour”.

“We are pleased that the GLA has been conducting a review this year, as they can only have a positive impact on the GLA going forward”.