

GLA 28/8.5

External Communications Strategy for 2011-2012

11 January 2011

BOARD PAPER REFERENCE – GLA 28/8.5 – External Communications Strategy for 2011 – 12Issue

1. To note 2011–2012 priorities. It updates and replaces the version of the strategy presented and approved at the November board (27 8.9).

Background

2. This is an update on 2010-1011 paper (reference GLA 27 8.9). It has been revised to reflect a change of emphasis to those press releases which generate the maximum prevention effect, and because the GLA may have less resources to continue its previous approach. Furthermore, it is considered that the GLA may have reached “saturation point” in so far as press releases are issued on all prosecutions, revocations, and refusals, irrespective of the outcome, and its preventative value.

Introduction

- 1.1. The Gangmasters Licensing Authority (GLA) will continue to maintain a high media profile during 2011/12, by focusing on high profile, multi-agency activity, and outcomes that demonstrate how the GLA has effectively tackled worker exploitation, and those cases that identify a novel or contentious non-compliance approach that the GLA has stopped. The previous GLA strategy has proved an effective regulatory tool, but in order to maximise continued media exposure it must focus on those cases that will generate the greatest outcome for the resources invested. Though continuing to be difficult to measure, an effective media profile will ensure that it plays a part in prevention and deterrence of exploitation. This is appropriate as the GLA moves further from its initial licensing and compliance activity to one in which it is more aggressive in targeting non-compliant licence holders and unlicensed gangmasters, particularly where associated exploitation is identified.
- 1.2. In addition it is important to highlight the GLA’s value for money, particularly with reduced resources.
- 1.3. As reported in the 2010-2011 strategy, the independent reviews by the Universities of Liverpool and Sheffield identified that communications has a direct impact, enabling the GLA to “punch above its weight”. :

This shows the GLA’s approach to communications is an effective tool in securing compliance with business. However, more can be done to raise awareness with workers in the GLA sectors.

- 1.4. This strategy explains the GLA’s approach for communicating how the :
 - Authority protects vulnerable workers and,
 - its effectiveness as an enforcement body in tackling non-compliant businesses.

2. Strategic Priorities

- 2.1. The GLA's remit is clear – to tackle the abuse of workers and level the playing field for legitimate businesses struggling to compete against rogues undercutting them. The core purpose underpins the four key strategic aims which continue to drive the GLA communications approach during 2011/12.

Demonstrating the GLA's impact on the problem

- 2.2. The GLA will be judged by its success in fulfilling its remit. Therefore, it is vital for the Authority to communicate its impact as an effective enforcement body through its intelligence-led operations. This requires its media focus to concentrate on its high profile operations, which convey a deterrent effect.
- 2.3. This approach will fulfil part of recommendation 12 in the Liverpool / Sheffield report: "the GLA should continue covert operations and high-profile media campaigns to ensure the visible threat of detection remains strong".
- 2.4. Furthermore, recommendation 14 in the Liverpool / Sheffield report advocated that "the GLA should make more of its excellent (97%) success rate at appeal in order to try and reduce and deter those gangmasters who might wish to appeal against a revocation". This will be addressed by providing clearer details on its success rate, and links to Defra's register of appeal decisions.

Demonstrating the GLA's value for money

- 2.5. The recession means there is likely to be a drop in tax revenue and increased pressure on public spending. It makes sense for the GLA to show how its work benefits UK PLC. Its GLA Briefs on issues such as the travel and subsistence issue, will support increased prevention and compliance for its regulatory partners.

Increase knowledge of employment rights and encourage more vulnerable workers to come forward for help

- 2.6. Recommendation 13 in the 2008 Liverpool / Sheffield report called for more awareness raising amongst agency workers – a point the GLA acknowledges that more can be done, not just by the Authority but across Government. Activity in this area is also in line with the findings of the TUC Commission on Vulnerable Employment (CoVE) report which advocated that "immediate action needs to be taken to improve employment rights awareness".¹ A dedicated area of the GLA's website will remain to ensure that this occurs.

Provide clear guidance and advice to labour providers and labour users

¹ See: www.vulnerableworkers.org.uk

- 2.7. This is one of the principles of the Hampton report. Effective advice and guidance can reduce the administrative burden on business as well as the risk of non-compliance. Therefore, it is vital the GLA provides clear and concise advice and guidance in the most appropriate formats. Equally, it will explain how it will address the requirements and principles of the statutory Compliance code for regulators.

3. Target Audience

- 3.1. A detailed stakeholder analysis is available in the series of Liverpool / Sheffield reports available on the GLA website.² Generally speaking the following groups will be targeted:

Workers

- 3.2. The overall objective and message is to raise awareness of employment rights and what to do to get help.
- 3.3. The responses to the labour provider survey conducted as part of the 2008 Liverpool and Sheffield research show three quarters of the workforce in the GLA sectors are foreign-born. The continued use of migrant workers requires the GLA to provide information in multiple languages.

Labour Providers

- 3.4. Applicants and GLA licence holders need to know what they must do to obtain and remain compliant with the Authority's Licensing Standards. Unlicensed gangmasters must continue to be made aware of the penalties for trading illegally.
- 3.5. The majority of labour providers are UK based. However, a number are overseas. GLA communications should be adapted to take account of the differing geographical locations. – we can revisit this after Macrory.
- 3.6. With the introduction of the new forced labour offences it is important that the GLA demonstrates how its prosecutions address its mission statement, and tackles unlicensed labour providers that have exploited workers. The media releases will focus on those prosecutions where there are clear aggravating factors, and effective prosecution outcomes, which act as strong deterrents to other not to commit offences.

Labour Users

- 3.7. Labour users must continue to be made aware of the penalties for using an unlicensed gangmaster (including where the labour provider is based outside the UK).

² See: www.gla.gov.uk/index.asp?id=1013265

- 3.8. Labour users should also be aware of any other obligations with using labour providers.
- 3.9. Labour Users should be encouraged to use the GLA Active check and awareness raised about the good practice guide that has been developed alongside the Supermarket and supplier protocol.
- 3.10. They should also receive information that assists prevention of offences. The GLA will meet this requirement by the introduction of new alerts to warn Labour users and providers of whether organisations who mailshot them are operating legitimately.

4. Activities

Demonstrating the GLA's Impact on the Problem

- 4.1. A bold and sustained approach will be used to generate a high profile for the GLA's effectiveness. This will include:
 - Involving media in GLA operations and generally engaging proactively with the media to showcase the work of the Authority (for example through highlighting how the GLA secures pay arrears for workers). Opportunities to embed journalists at an early stage in an operation where the result may not be realised for several months or more should be considered, and
 - Continuing to "name and shame" rogue labour providers and complicit labour users. This campaign will be primarily conducted through press stories (this is likely to drive up compliance through the fear of brand and reputation being ruined). Detailed press releases will be considered where there is serious exploitation and aggravating factors, whether identified in a prosecution or revocation. In other cases a summary will be issued to the press release page each month to list those other revocation or prosecution results (name of the LP, area of the country, whether a prosecution or revocation, etc) to enable journalists to seek additional information if required.
- 4.2. The GLA will introduce a link to appeal results on the GLA website. This will allow access for labour users to see the details of their labour providers' case and also for interested parties to better understand the issues the GLA are clamping down on.

Demonstrating the GLA's Value for Money

- 4.3. Similar to the activities related to demonstrating the GLA's impact on tackling the problem, the GLA will seek to promote how it has increased tax revenue and reduced exchequer fraud through the use of appropriate news stories.

Increase knowledge of employment rights and encourage more vulnerable workers to come forward for help

Worker Rights Leaflet and Contact Card

- 4.4. The GLA Worker Rights leaflets are available in 18 languages. A smaller contact card has been printed in 5 languages. The leaflet was first produced in 2005/06 and has been extremely popular (over 65,000 leaflets have been distributed). The leaflet has now been updated and refreshed although remaining in its popular and much copied format and will remain our principle communication product over the coming year.
- 4.5. The leaflet and contact card will be distributed for free in a variety of ways, including:
- By GLA officers during inspections,
 - By GLA Community Enforcement Officers during their work
 - Making them available for groups who have contact with workers (including trade unions, community groups and consular services in foreign embassies in the UK),
 - Downloadable from the GLA website,
 - Licence holders,
 - Citizens Advice Bureau, and
 - Local Authorities.

Worker Adverts

- 4.6. Throughout 2009/10, the GLA published a series of hard-hitting adverts in foreign language press in the UK designed to encourage abused workers to come forward. Due to the coalition government's freeze on advertising, adverts will not be part of this year's strategy.

Provide clear guidance and advice to labour providers and labour users

Published Guidance

- 4.7. The advice and guidance available on the GLA website will be reviewed to make sure it is easy to access and understand. Where possible, information will be consolidated to avoid repetition. The website is currently being revised. The new structure will increase use and access, and ensure stakeholders can locate information broadly aligned to the core Hampton principles. Translating relevant information for labour providers based outside the UK will also be considered.
- 4.8. The GLA has worked with industry to produce a best practice guide. This will now be communicated to labour users in order to raise compliance levels (for example, the minimum charge rates guidance). It will continue to build on this work through the Supermarket protocol working group, encouraging new signatories, and also encouraging their active engagement to support practical application of the protocol. It will also alert them to key risks to enable them to advise their supply chains to be vigilant and exercise due diligence.

Labour Provider and Labour User Adverts

- 4.9. Adverts reminding labour providers and labour users of the legal requirements associated with the licensing scheme will not be used this year due to the coalition government's freeze on advertising, these will not be part of this year's strategy.

Community Activity

- 4.10. Engagement with the local communities will remain a key element of the GLA's approach, but will be a requirement of all operational enforcement officers. The outreach work will continue to focus on the following areas:

Contacting and building relationships within their region with:

Police and Fire service

Local Authorities

Faith/church Groups

CAB

Local union representatives

Labour providers

Labour users

5. Resources

6. The reduced budget for 2011/12 impacts all aspects of GLA operations. Expenditure on new products or awareness campaigns will therefore be severely limited.

7. Measuring Success

- 7.1. Each separate activity will be evaluated individually. Regular feedback will be sought from stakeholders. The overall strategy will be reviewed annually.
- 7.2. A key element of this evaluation will be assessing whether any campaign results in more calls to the GLA.

	Press Releases	High profile operations	Prosecutions	Unpaid tax identified figures	Press releases in foreign language media	GLA letter in labour provider starter packs	Appeal results linked from website	The GLA Brief /warnings & alerts	GLA Website	Good practice guide	Minimum Charge Rates		- delete column	Updated Mission Statement
High media profile	X	X	X					X						
Prevention and deterrence of exploitation	X	X	X		X			X			X			
GLA's value for money	X	X		X										
Raise GLA awareness with agency workers					X	X		X						
Supporting legitimate	X							X						

