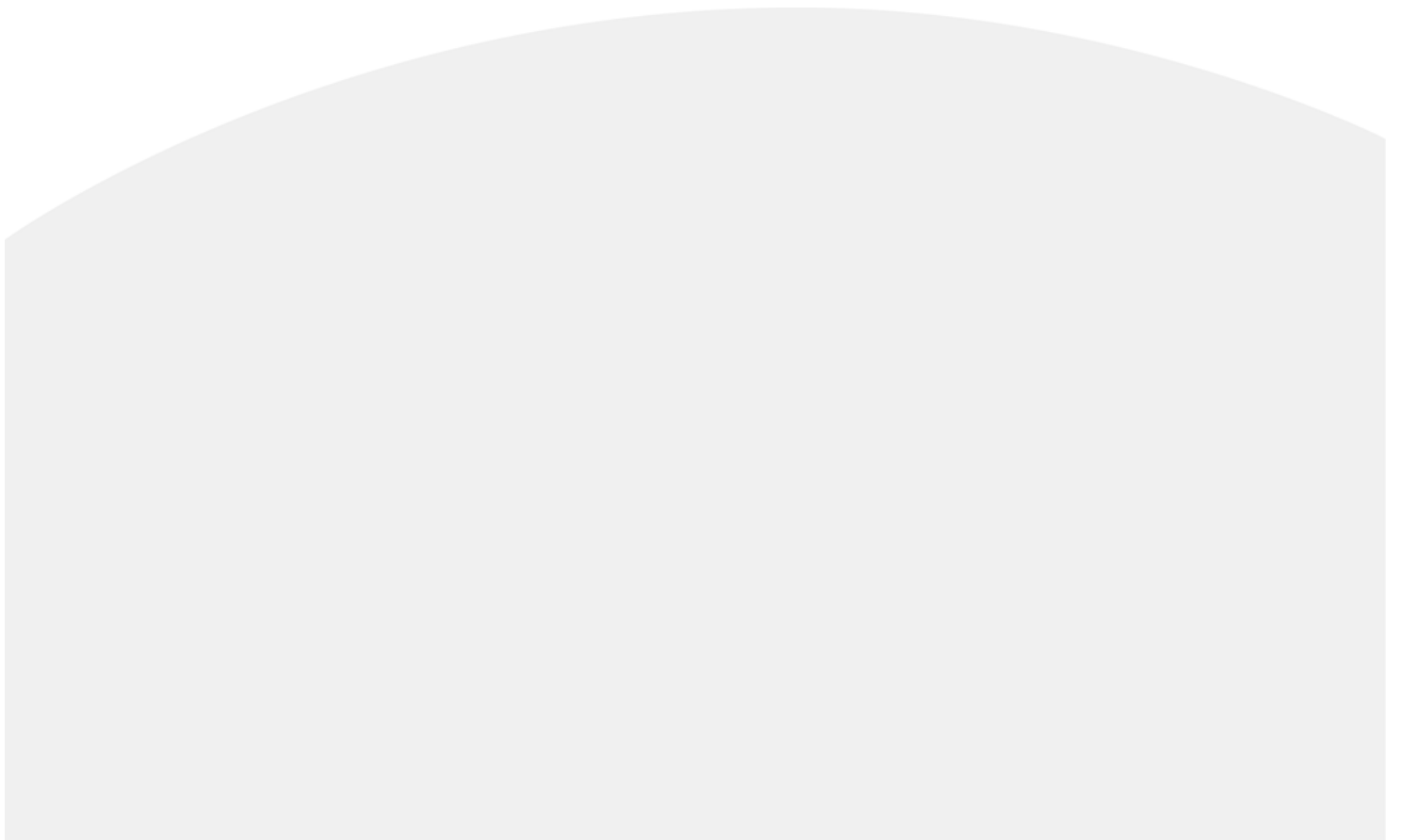


GLA 27/8.9

External Communications Strategy for 2010-11

25 November 2010



BOARD PAPER REFERENCE – GLA 27/8.9 – External Communications Strategy for 2010 – 11Issue

1. To note 2010–2011 priorities

Background

2. This is an update on the 2009-10 paper (reference GLA 22 7.2)

Introduction

- 1.1. The Gangmasters Licensing Authority (GLA) will continue to maintain a high media profile during 2010/11. This has proved an effective regulatory tool so far. Though difficult to measure, if there is an effective media profile it 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.
- 1.2. In addition to the core work of the GLA in the current financial climate within the public sector it is important to highlight the GLA's value for money and work for legitimate businesses who can be undercut by the rogues and for the unemployed who are less likely to find jobs if gangmasters pay less than the minimum wage.
- 1.3. The independent reviews by the Universities of Liverpool and Sheffield show the GLA has made a good start and the latest report comments that communications has a direct impact:

“One of the main reasons that the GLA is able to ‘punch above its weight’ is that it has made effective use of publicity and communications. We did not find anyone who was critical of the strategy; although we also note that few agency workers have actually heard of the GLA. Furthermore, many labour providers and users (as noted in the 2007 Annual Review) live in a state of permanent anxiety, and sometimes fear, as to what would happen to them if the GLA were to find anything illegal. This fear / anxiety is not principally about the threat of government regulation / criminal action, but about the possible loss of supermarket contracts. In other words, publicity and communications enables the GLA to ‘punch above its weight’ but the impact is exaggerated by labour users’ and labour providers’ anticipation of the main supermarket buyers’ and ethical auditing/trading teams’ response to such negative publicity.”
- 1.4. 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.

- 1.5. 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 worker and level the playing field for legitimate businesses struggling to compete against rogues undercutting them. The core purpose underpins the four key strategic aims driving GLA communications during 2009/10:

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.
- 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".

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.

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

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.

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. While there are some indications that there may be a decline in foreign nationals in the labour force, the use of migrant workers will continue to be prevalent. Therefore, the GLA will continue 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. One area where this can be enhanced is providing multi-language versions of the prosecution policy.
- 3.6. The increasing prevalence of labour provider prosecutions should be highlighted as a deterrent to those remaining within GLA sectors without a licence.

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).
- 3.8. Labour users should also be aware of any other obligations with using labour providers.

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

- 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.

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), 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).

- 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. 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).

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 Enforcement Officers

- 4.10. This year sees an additional resource with the potential to be used for communication purposes. The GLA has recruited 10 Community Enforcement Officers who will be working in a defined area classified as a potential area for worker exploitation. There may also be opportunities for developing the media profile of these roles. These officers will perform outreach work in 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

- 5.1. The communications budget for 2010/11 is a maximum of £30,000. A large proportion of this will be spent on translating and printing publications. Due to the coalition governments' announcement of a freeze on advertising, advertising is not considered in this strategy.

6. Measuring Success

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

Ensuring the key mission of the GLA is still relevant														X
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