



Gangmasters &
Labour Abuse Authority

GLAA Strategy for Protecting Vulnerable and Exploited Workers 2017 - 2020

1. Introduction

- 1.1 The Gangmasters and Labour Abuse Authority (GLAA), formerly the Gangmasters Licensing Authority (GLA), works in partnership to protect vulnerable and exploited workers.
- 1.2 The Gangmasters (Licensing) Act 2004 (the GLA Act) was introduced following the death of 23 cockle pickers in Morecambe Bay in February 2004 and created a licensing scheme to regulate the supply of temporary labour to the farming, food processing and shellfish gathering sectors, establishing the GLA to administer that scheme.
- 1.3 The GLA Act aims to protect the most vulnerable workers employed in the regulated sectors by ensuring that those engaged in the supply of workers, or who use workers to provide a service, meet minimum employment and other standards.
- 1.4 The GLA Act also created four criminal offences, arising from the licensing scheme, of operating as an unlicensed gangmaster; entering into arrangements with an unlicensed gangmaster; obstructing GLA officers; and having false documentation.
- 1.5 Following the introduction of the Modern Slavery Act 2015 and the Immigration Act 2016, a much greater national focus has been given to labour exploitation. A review of the role and remit of the GLA took place which concluded that the GLA should have a broader role in tackling labour exploitation and be renamed as the Gangmasters and Labour Abuse Authority (GLAA).
- 1.6 New powers to investigate labour market offences in England and Wales were given to the GLAA through the Immigration Act 2016 and these commenced on 30 April 2017. The GLAA will retain its licensing and regulatory function of temporary labour in the food and farming sectors but now has a much broader role in terms of addressing labour exploitation across the entire labour market regardless of worker status in accordance with the Director of Labour Market Enforcement's strategy.

2. What we do

- 2.1 Over the last ten years the GLAA has regulated the activities of gangmasters in the farming, food processing and shellfish gathering sectors across the whole of England, Scotland, Wales and Northern Ireland. A gangmaster, as defined by the GLA Act, is a person who supplies a worker to do work covered by the GLA Act, or who uses a worker to do work covered by the GLA Act in the course of providing a service, or someone who makes arrangements for that worker to do the work.
- 2.2 There are nearly 1,000 licensed gangmasters across the UK who supply approximately 464,000 temporary contracted workers in the regulated sector. The GLAA has civil powers to carry out inspections at application stage and throughout the duration of the licence to ensure compliance, as well as the ability to invoke additional licence conditions and suspend or revoke a licence depending upon the severity of the breach.

- 2.3 Subsequent to our expanding role the GLAA will now be able to intervene more effectively at a number of different stages of the ‘workers’ journey’ across the entire labour market. In addition to managing the licensing scheme as described above, from 30 April 2017, the GLAA has additional responsibilities including: police-style powers under Section 1 of the Modern Slavery Act (forced or compulsory labour); increased powers to search for and seize evidence; and investigation of offences under the National Minimum Wage (NMW) and Employment Agencies Acts, as well as the existing Gangmasters Licensing legislation. This enhanced investigatory function will aim to protect all workers, regardless of employment status and will not therefore be restricted to temporary workers.
- 2.4 The Government has also introduced measures to provide a more coherent framework for identifying and preventing abuses of labour market legislation and to strengthen the enforcement response. This includes new powers to apply Labour Market Enforcement Undertakings (LMEUs) and Labour Market Enforcement Orders (LMEOs). These are intended for more serious or persistent offenders where this type of intervention is judged appropriate to prevent further offending.
- 2.5 The role of Director of Labour Market Enforcement has been created to establish greater co-ordination of the enforcement bodies (GLAA, Employment Agency Standards Inspectorate (EASI), National Minimum Wage Unit of HMRC) to drive activity. The Director is appointed by and reports to both the Home Secretary and the Secretary of State for Business, Energy and Industrial Strategy. The Director’s primary functions will include setting the strategic direction of the enforcement bodies; publishing an annual report assessing the success of action in meeting the objectives and priorities in the previous year’s plan; and leading an Information Hub, with information drawn from the enforcement bodies and beyond. The hub will provide the Director with a single view of risk and priorities across the spectrum of non-compliance – from accidental payroll errors to serious criminality. The GLAA will work to support the Director’s strategy.
- 2.6 This three year GLAA Strategic Plan builds upon previous plans, will be reviewed and revised on an annual basis and sets out how the GLAA will achieve its organisational responsibilities, aim and objectives.

3. Strategic Aim and Objectives 2017 – 2020

- 3.1 The GLAA has a single overarching aim:

‘Working in partnership to protect vulnerable and exploited workers’

Strategic Priorities

- 3.2 This aim will be achieved by maintaining a continual focus on three strategic priorities:

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

Strategic Objectives

3.3 To achieve these three strategic priorities, the GLAA has six objectives

- One** Disrupt criminal activity within the labour market
- Two** Engage with stakeholders to minimise and manage risk
- Three** Support compliant business
- Four** Work in partnership to protect workers' rights
- Five** Maintain a credible licensing scheme, creating a level playing field and promoting growth
- Six** Identify and support victims of labour exploitation

Strategic Programme of Activity

3.4 During the lifetime of this Strategic Plan, the GLAA will engage in three specific areas of work which will all be achieved in partnership:

- Prevent** prevent workers from being exploited for their labour
- Protect** protect workers and potential victims so making them less vulnerable to being exploited for their labour
- Pursue** relentlessly pursue, disrupt and prosecute those who engage in the exploitation of workers

3.5 These areas of activity will be underpinned and driven by:

- Good governance,
- Effective use of budgets to target areas of maximum impact and to achieve value for money,
- Maximising the use, expertise and deployment of staff,
- Employing effective risk mitigation practices and processes,
- Gathering and analysing intelligence,
- Enhancing relationships and joint working with all partner bodies,
- The effective use of international best practice, and
- Development with stakeholders of the GLAA 'Innovation Lab'.

4. Delivering the Plan - Values

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

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

5. Delivering the Plan - Resources

- 5.1 The GLAA employs 71 people, 31 of whom are based at its head office in Nottingham, providing core central functions including: licensing; the collation, analysis and management of intelligence based on a threat and risk methodology; finance, communications, IT and HR.
- 5.2 A further 37 Intelligence Officers, and Enforcement and Compliance Officers, together with their three managers, are home-based in locations throughout the UK, to maintain the licensing scheme and investigate suspected criminality.
- 5.3 In order to undertake the additional responsibilities required by the Immigration Act 2016, the overall number of staff will increase in the lifetime of this Strategic Plan.
- 5.4 The GLAA is fully funded by the Home Office which provides an annual budget. The 2017-18 expenditure is £7.6m. This represents an increase in funding of £2.6m from 2016-17 which reflect the increase in role, powers and responsibility of the GLAA. Approximately 55 new staff will be recruited taking the total number of staff in the GLAA to c125 by April 2018.
- 5.5 In addition, the GLAA intends to consider opportunities to develop and progress alternative funding streams in the 'prevent and protect' space, working with industry to create strategies which will deliver more effective protection for the vulnerable.
- 5.6 Low paid low skilled work that is affected by seasonal or other trends are at particular risk from being exploited for their labour. In addition their vulnerability may be heightened by shared and overcrowded accommodation; unfamiliar surroundings; no or very little spoken English; detachment and isolation from family and friends; real or perceived coercion and being controlled by someone else.
- 5.7 Therefore GLAA will work with business to manage down the vulnerability of workers through training, awareness raising, conducting compliance inspections for companies falling outside the scope of licensing and other preventative activities designed to increase knowledge and awareness of the signs of labour abuse.

6. Delivering the Plan - Governance

- 6.1 A governance board of up to eight independent members plus a Chair provide the scrutiny, oversight and governance of the work of the GLAA.
- 6.2 The GLAA also has an Audit and Risk Committee and a Remuneration Committee. These groups offer guidance and recommendations to the main Board, thereby enabling it to concentrate on matters of most strategic importance.
- 6.3 The GLAA is audited regularly through Government arrangements with Home Office auditors and the National Audit Office, and is accountable to the Home Office's Crime, Policing and Fire Directorate.
- 6.4 The opportunities presented by the appointment of the Director of Labour Market Enforcement also represent an increase in governance and scrutiny.

7. Delivering the Plan – Scale of Change

- 7.1 The GLAA is in a period of unprecedented change. Within six months the Authority will grow by 50 per cent overall with a 100 per cent growth in operational resource. In addition a new IT platform and public facing licensing system (LAWS) will be delivered throughout 2017 to ensure the new remit and powers are supported by an up to date infrastructure. The GLAA will also be promoting its new name, brand and role.

8. Delivering the Plan – Operational Impact

Measuring Impact

- 8.1 The GLAA will be held to account by its Board, the Home Office and the Director of Labour Market Enforcement for its activity in furtherance of its strategic aim, priorities and objectives. Outputs and outcomes will be measured through a suite of performance indicators which will be used to evaluate the success of this Strategic Plan.
- 8.2 In order to demonstrate the impact and difference made by GLAA activity, performance will be measured at a strategic level against five key performance questions:
 - KPQ 1 How comprehensive is the GLAA's understanding of the scale and threat of labour exploitation in the UK?
 - KPQ 2 How effective is the GLAA's response to the identified threats of labour exploitation and modern slavery?
 - KPQ3 How effective is the GLAA at working with partners to tackle labour exploitation and modern slavery?

KPQ4 How effective is the GLAA at working with business, labour users and providers to drive up standards, preventing and tackling labour exploitation and modern slavery?

KPQ 5 How effective is the GLAA at managing its resources?

8.3 Performance at a strategic level against the key performance questions will be reported to the GLAA Board, Home Office and Director of Labour Market Enforcement on a quarterly basis to ensure appropriate oversight, scrutiny and governance.

8.4 A full range of diagnostic indicators exist to measure performance under the five key questions which are all linked to the strategic objectives. Performance against these measures will be reported on a monthly basis to ensure oversight and governance.

8.5 Due to the change in the role of the GLAA from spring 2017 some of the pre-existing indicators used to date are being superseded. However, in order to maintain momentum and measure performance and impact in the transition year of 2017-18, pre-existing headline measures will be retained to run alongside the new indicators. This will ensure that focus in the current regulated sectors of the labour market is not diluted as the new GLAA powers come into effect.

9. Stakeholder Engagement

9.1 The GLAA is a small organisation that carries significant responsibilities. Stakeholder engagement remains at the core in delivering its objectives.

9.2 The GLAA will widen its stakeholder base to reflect its extended powers and responsibility in addressing labour exploitation. Mechanisms are in place to demonstrate an ongoing commitment to prompt, clear and two-way communication with all our stakeholders. A formal communications strategy to maximise all means of contact will continue to evolve during and beyond the lifetime of this plan.

9.3 The GLAA has dedicated liaison groups for Labour Users/Providers and also for Worker/NGOs which are chaired by Board members and designed to act as critical reference groups to facilitate debate from key stakeholders and enable them to discuss and influence policy and strategy. These groups complement the formal governance arrangements provided by the Board to ensure a fully inclusive and integrated engagement environment exists between the GLAA, its Board and industry.

9.4 Over the lifetime of this strategy the GLAA will continually strive to enhance its relationship with its stakeholders across the private, public, voluntary and faith sectors to ensure it meets the needs of the workers and the industry. Such activity will be coordinated to complement the work of the Director of Labour Market Enforcement.

10. Risk Management

- 10.1 The GLAA will be unrelenting in its approach to disrupt labour exploitation in all its forms by any lawful, ethical and reasonably cost-effective means.
- 10.2 Managing risk in all aspects of the work of the GLAA is critical to ensuring that a consistently high level of service is delivered. The GLAA has a risk management strategy which is the framework for identifying, evaluating, managing and mitigating risks, and includes setting risk appetite and risk tolerance levels. The risk register is reviewed annually by the Board and key risks are considered at every Board meeting. Detailed risk reviews are undertaken by the Audit and Risk Sub-committee of the Board chaired by a board member. A process for the escalation to the Home Office of serious organisational risks is followed.
- 10.3 A key aspect of risk management is identifying the risks to vulnerable and exploited workers, evaluating those risks and deciding on the most appropriate course of action to safeguard the vulnerable and to protect workers' rights. This could include HMRC, EASI or other law enforcement partners depending upon which agency is best placed to respond accordingly.

11. Summary

- 11.1 This strategy for 'Protecting vulnerable and exploited workers 2017 - 2020' seeks to illustrate a clear framework by which the GLAA will continually improve, enhance public and stakeholder confidence and most importantly, work in partnership to protect vulnerable and exploited workers. We are grateful to stakeholders for their feedback throughout the drafting of this strategy and their ongoing support and engagement.
- 11.2 Feedback is greatly appreciated and further explanation as to any aspect of this strategy can be given by contacting:

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