



Gangmasters &
Labour Abuse Authority

GLAA Strategy for Protecting Vulnerable and Exploited Workers 2018 - 2021

1. Introduction

- 1.1. The Gangmasters and Labour Abuse Authority (GLAA) has a single overarching aim: 'Working in partnership to protect vulnerable and exploited workers'. This document, and the associated annual Business Plan, set out the GLAA's strategic priorities to deliver that aim.
 - Preventing worker exploitation
 - Protecting vulnerable people
 - Pursuing those who exploit others for their work either financially, physically and or through coercion and control
- 1.2 The GLAA will revise and produce its strategic plan covering a three year period, each year. It will also produce a more detailed Business Plan each year, focusing on the activities planned for the first year covered by the related strategic plan.
- 1.3 In the development of the strategic plan the GLAA will have regard to:
 - The National Crime Agency's annual National Strategic Assessment of Serious and Organised Crime
 - The Director of Labour Market Enforcement's annual strategy
 - Independent Anti-Slavery Commissioner's strategic plans
 - The GLAA Annual Strategic Assessment on labour exploitation
 - Global best practice on the pursuit and prevention of labour exploitation, developed by international partners
 - Analysis of performance against targets within the GLAA Business Plan for the preceding year
 - The GLAA risk register, identifying all threats and risks and methods of mitigating their impact on the operations of the GLAA and the protection of workers
 - External reports by Her Majesty's Inspectorate of Constabulary Fire and Rescue Services (HMICFRS), the National Audit Office, Migration Advisory Committee, Low Pay Commission, where such reports illuminate issues relevant to the GLAA's ability to meet its overarching aim
 - Internal inspection reports by, for example, Government Internal Audit Service
- 1.4 These reports will inform the priorities and approach the GLAA considers is appropriate to continue to effectively discharge its mission. In doing so the GLAA will continue to relentlessly pursue and prevent exploitation, enhancing the protective support to victims, whilst maintaining an adaptable and flexible response in doing so. Future iterations of the strategic plan will identify any new objectives and the report and recommendations they are derived from.
- 1.5 In particular the GLAA's annual strategic assessment will inform whether activity in relation to a particular industry sector is effective, and matured, and whether the GLAA should change its focus to another sector where evidence suggests increased levels of exploitation are being detected. The timing of the Director of Labour Market Enforcement's strategy, and the GLAA's strategy, will also determine the extent to which each informs the other, or identifies areas where work should be commissioned to establish and improve the evidence

base to support the determination of priorities. The Director’s strategy will also inform prevention activity where it is concluded greater assistance and guidance to employers is required to assist them to become and maintain compliance with the law.

1.6 Future areas of focus and impacts that are being monitored, reflecting the GLAA’s assessment and the Director of Labour Market Enforcement’s strategy, are:

- Car washes
- Nail bars
- Construction
- Textiles
- Changes in the Gig economy
- Impact of Brexit on the nature of exploitation
- Specific areas of reported labour shortage

1.7 Where the strategic plan identifies that priorities, objectives, or activities need to change these changes are then reflected in detail in the annual Business Plan.

1.8 The 2018-2019 business plan sets out the current priorities, which remain unchanged for this year. It details the priorities, objectives, deliverables, and the key metrics that the GLAA will assess itself against, with details of current budgets and financial pressures.

1.9 The GLAA’s Business and Strategic Plans will be reviewed annually in accordance with the GLAA’s annual planning cycle, which takes account of the production dates of the key publications referred to in paragraph 1.3.

2 Strategic Objectives

2.1 The strategic priorities (see paragraph 1.1) are underpinned by six strategic objectives which determine the operational focus of the authority. These are:

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 and prevent labour exploitation
Five	Maintain a credible licensing scheme, creating a level playing field and promoting growth
Six	Identify and support victims of labour exploitation

3 Governance

- 3.1 The GLAA Board, consisting of up to eight independent members plus a Chair provide the scrutiny, oversight and governance of the work of the GLAA, which is led by Roger Bannister, interim Chief Executive. It is supported by an Audit and Risk Committee and a Remuneration Committee. These committees offer guidance and recommendations to the Board, thereby enabling it to focus on matters of most strategic importance.
- 3.2 The GLAA is audited regularly through Government arrangements with the Government Internal Audit Service and the National Audit Office, and is accountable to the Home Office, through the Crime, Policing and Fire Group. It is also subject to inspections by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS), the Independent Office for Police Conduct (IOPC) concerning the conduct of its officers, and the Investigatory Powers Commissioner's Office (IPCO) regarding the GLAA's use of its investigative powers.
- 3.3 The oversight of the GLAA Board, with the support of the NAO, HMICFRS, and others, ensures that the GLAA's strategic and business plans, and the areas of activity it undertakes in each year, will be underpinned and driven by:
- good governance
 - soundly based performance reporting
 - 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, and
 - the effective use of international best practice.
- 3.4 The GLAA's performance against the key performance indicators set out in the Business Plan will be reported to the GLAA Board, Home Office and the Office of the Director of Labour Market Enforcement on a quarterly basis to ensure that there is appropriate oversight, scrutiny and governance. It is also reported to GLAA stakeholder groups.
- 3.5 To deliver these reports a full range of diagnostic indicators have been developed to measure performance. Monthly performance reporting, which will feed into the quarterly reports, will be utilised to gauge operational effectiveness on all strands of activity on a continual review, and inform analysis of annual performance and future iterations of the strategic plan.

4 People and Finance

- 4.1 Managing public money effectively, and ensuring it funds the right activity and the right levels of resources to deliver on the GLAA's priority operational responsibilities is key to the GLAA's ability to create and maintain an organisation that pursues and prevents labour exploitation successfully.
- 4.2 The GLAA will critically review its organisational approach on an annual basis to assess opportunities for efficiencies whilst also assessing where and how its impact may be enhanced by additional resources. Where the GLAA considers its operational experience identifies opportunities that justify business cases for expansion of resources, it will submit such cases to the Home Office for consideration. In supporting businesses to raise their awareness of modern slavery, and how to spot and tackle it, the GLAA may look at opportunities to work in partnership, with a form of trading fund status to assist the expansion of its training offerings.
- 4.3 The role of HR to ensure support to staff, clear policies, and succession planning to determine when future recruitment exercises are required is key to the maintenance of the GLAA's operational capability. This will include the development of relevant policies and procedures that support enhanced flexibility and availability of GLAA officers to respond to demand.
- 4.4 Future recruitment planning and selection will reflect operational skills requirements, and new skills that may increasingly be required to assist, for example, digital investigation.
- 4.5 Whilst it is not possible to assess what future requirements may be at this point the assessment of the GLAA's performance, and successes, will assist in the analysis of resource requirements for future business years. This will be complimented by the experience derived from the effective outcomes from the deployment of staff on priority investigations. Additionally, the GLAA's strategic assessment of existing and emerging high priority areas of risk inform how and where staff are deployed in future. Together they will feed into the any appropriate business plan that may be necessary as the GLAA's assessment of resource requirements is made.

5 What we do

- 5.1 The Gangmasters (Licensing) Act 2004 (the GLA Act) was introduced following the death of 23 cockle pickers in Morecambe Bay in February 2004. The Act 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.
- 5.2 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.

5.3 In 2017 we commenced our wider role as the Gangmasters and Labour Abuse Authority, using our new powers in relation to wider labour market offences. Currently we:

- Licence individuals and business operating in the supply of workers in the agricultural, shellfish, and associated processing and packaging activities
- Inspect licence applicants and licence holders to ensure compliance with the GLAA licensing standards
- Investigate allegations of labour market abuses (as defined in section 3(3) of the Immigration Act 2016), which include offences in the:
 - Gangmasters (Licensing) Act 2004
 - Employment Agencies Act 1973
 - National Minimum Wages Act 1998
 - Parts 1 and 2 of the Modern Slavery Act 2015
- Utilise licence refusal and revocation, prosecutions, and the use of available alternative sanctions, to ensure a proportionate and effective outcome that addresses the severity of identified offending
- Exercise a statutory first responder role, referring victims into the National Referral Mechanism (NRM)
- Record and report on potential victims, to assist in identifying the scale of potential victimisation even where individuals do not wish to enter the NRM
- Deliver a prevent function to engage with stakeholders across industry and worker representative groups to raise awareness of how to identify and report potential forced labour situations

5.4 Apart from prosecution, the sanctions available to the GLAA are:

- Labour Market Enforcement Undertakings (LMEU) (in agreement with the offender to address non-compliances identified)
- Labour Market Enforcement Orders issued by a court (to address non-compliance with a LMEU)
- Slavery and Trafficking Risk and Prevention Orders (STROs and STPOs)

5.5 The new powers available in England and Wales enable the GLAA to undertake criminal investigation into allegations of labour market offences beyond its historical remit in the agricultural and shellfish sectors. It does so working closely with the Employment Agency Standards Inspectorate (EASI) and HMRC's National Minimum Wages teams, the police, National Crime Agency, and other regulatory and enforcement bodies. But this does not enable it to carry out any statutory compliance functions, which are associated with the licensing regime, in any other industry sectors.

5.6 What the GLAA can do differs over the devolved administrations. The GLAA recognises these differences impact the GLAA’s ability to pursue and prevent labour exploitation consistently across the UK. The differences are illustrated in the table below:

England and Wales	Scotland	Northern Ireland
Licences labour supply in the regulated sector	Licences labour supply in the regulated sector	Licences labour supply in the regulated sector
Undertakes compliance inspections in the regulated sector	Undertakes compliance inspections in the regulated sector	Undertakes compliance inspections in the regulated sector
Grants, refuses, revokes licences	Grants, refuses, revokes licences	Grants, refuses, revokes licences
Investigates offences in the Gangmasters (Licensing) Act 2004	Investigates offences in the Gangmasters (Licensing) Act 2004	Investigates offences in the Gangmasters (Licensing) Act 2004
Investigates offences in the Employment Agencies Act 1973		
Investigates offences in the National Minimum Wages Act 1999		
Investigates offences in the Modern Slavery Act 2015 (in relation to forced labour)		
Use Labour Market Enforcement Undertakings (LMEUs)	Use LMEUs	
Apply for Labour Market Enforcement Orders (LMEOs)	Apply for LMEOs	
Use combined LMEUs over offences excluding the Modern Slavery Act 2015		
Apply for combined LMEOs over offences excluding the Modern Slavery Act 2015		
Apply for Slavery and Trafficking Prevention Orders (STPOs)		
Apply for Slavery and Trafficking Risk Orders (LMEO)		
Use powers in the Police and Criminal Evidence Act 1984 to investigate wider labour market offences		

5.7 Although the GLAA does not have additional criminal investigative powers and remit in Scotland and Northern Ireland, it will continue to support their respective police services’ investigations into forced labour offences and investigate offences from the 2004 Act in those jurisdictions.

5.8 Whilst there are jurisdictional limitations on the GLAA's investigative abilities its "Prevent" activities are not similarly limited. The GLAA therefore undertakes national and international activities to enhance awareness of labour exploitation, and forced labour, and prevent such practices infiltrating supply chains.

6 Our Future Plans

- 6.1 The GLAA operates in an environment that includes criminality and GLAA operations are not without risk. 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. To fulfil its basic purpose the GLAA has to accept a degree of risk: its appetite cannot be universally low.
- 6.2 In our future plans we continue to look for opportunities that maximise the protection of workers through the GLAA working with others. This could also include HMRC, EASI, police or other law enforcement partners, Health and Safety Executive, Other Government Departments, and local authorities, depending upon which agency is best placed to respond.
- 6.3 Stakeholder engagement remains at the core of the GLAA's Prevent programme, to assist in delivering its objectives, developing the assistance of others to increase intelligence and create greater pressures for legal compliance. The more aware UK business and worker groups are of what constitutes exploitation, and who, and how, to report such cases, the greater the chance that those who consider they can exploit workers without fear of punishment will be brought to justice. The GLAA will continue to widen its stakeholder base to reflect its extended powers and responsibility in addressing labour exploitation.
- 6.4 Building on the GLAA's existing industry stakeholder groups, over the lifetime of this strategy the GLAA will continually strive to expand and 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, the Independent Anti-Slavery Commissioner, and the Home Office's Prevention activity.
- 6.5 The GLAA has advanced plans with partners to investigate how low paid, low skilled workers that are affected by seasonal or other trends may be at particular risk from being exploited for their labour. Their vulnerability is often 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.
- 6.6 Therefore the GLAA will work with business to manage down the vulnerability of such workers through training, awareness raising, conducting compliance inspections in support of stakeholders for companies falling outside the scope

of licensing and other preventative activities designed to increase knowledge and awareness of the signs of labour abuse.

- 6.7 Internally, GLAA will work towards maintaining a flexible, knowledgeable and skilled workforce, developing specialist skills where required, and investing in the future of our staff, and the organisation as we consider the future recruitment for the GLAA to enable continuity and adaptability in the face of changing risks.
- 6.8 Recognising the likely constraints on future years' budgets, we will work to ensure the operational capability of the GLAA to tackle the most serious cases, and maintain the compliance pressures it has exercised in the licensing sector, remain undiminished. This will include the GLAA pursuing 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.
- 6.9 The work of the GLAA's communication team will support raising awareness of the GLAA's operational and prevention activity, thereby itself acting as a deterrent. Communications campaigns will support the key operational and prevention priorities, and, for example, in 2018-2019 will be focused particularly on activity in the Construction and Car Wash industries.

Over the period of this Strategic Plan

6.10 Specifically we will:

Activity	2018-19	2019-20	2020-21	Responsibility
Continually review and identify the high risk sectors based upon our intelligence analysis and investigative outcomes	Each year: Analysis of intelligence referrals, sectors, investigation outcomes in each year's strategic assessment will inform priority sectors of geographical areas for deployment of operational resources			Director of Operations
Direct Prevent resources to the identified high risk sectors to educate and engage organisations creating a force multiplier effect so that they form part of the GLAA's resources to identify and prevent exploitation, increasing the risk of detection for exploiters	Each year: Prevention plans will be revised on an annual basis to reflect trends and areas of increased referral to target prevention activity			Director of Strategy
Working with the DLME to test the feasibility to pilot versatile licensing or alternative regulatory models	Initiate a car wash pilot operating with the support of industry stakeholders Undertake scoping work to determine risk	Initiate a pilot on regulation of nail bars Analyse the car wash pilot, the feasibility of an industry approach or whether formal licensing should	Review other sectoral experience, to identify whether the role of other regulatory, industry regulation, or licensing should be tested.	Director of Strategy

Activity	2018-19	2019-20	2020-21	Responsibility
	factors in exploitation in nail bars	be considered and proposed	Analyse the nail bar pilot, the feasibility of an industry approach or whether formal licensing should be considered and proposed	
Identify academic institutions whose students may be a future source of recruitment, enriching the GLAA's knowledge base to develop new and innovative solutions to enhance the effectiveness of the GLAA across its Pursue, Prevent and Protect activities	Identify relevant institutions and engage institutions for potential internships, and projects, for example into digital investigation techniques	Assess the viability of discrete projects to identify new techniques that should be implemented, assessing whether new resources / skills are required via recruitment or upskilling of staff	Develop future talent plan for projects and recruitment to specialist activities	Director of Strategy / Director of People and Licensing / Director of Operations

Activity	2018-19	2019-20	2020-21	Responsibility
<p>Develop a GLAA investigator training programme to recruit and train from the “ground up”, including an apprenticeship scheme to grow talent and future leaders, coming to the GLAA from different employment and educational backgrounds, enhancing the GLAA’s age profile to provide continuity in service delivery</p>	<p>Identify relevant institutions and engage institutions for potential internships, and appetite for career opportunities with GLAA</p>	<p>Develop and test “full graduate training course”, and opportunities for intern attachments</p>	<p>Enable succession planning to focus on graduate recruitment and the implementation of apprenticeships</p>	<p>Director of Strategy / Director of People and Licensing</p>
<p>Undertake “lessons learnt” reviews to identify weaknesses in powers or procedures, to inform any appropriate proposals to enhance GLAA powers or resources of the GLAA’s powers</p>	<p>Review problems encountered in the use of powers, and frequency of the issue and recommendations from HMICFRS inspections</p>	<p>Set out proposals for change (if legislation or new powers are required), and consider wider awareness for Magistrates/police as a non-legislative solution</p>	<p>Assess the effectiveness of any legislative or non-legislative change to determine whether further reviews are required</p>	<p>Director of Operations / Director of Strategy</p>

Activity	2018-19	2019-20	2020-21	Responsibility
<p>Identify any risk arising from differential enforcement powers in different jurisdictions of the UK, and develop proposals on how such risks should be addressed and minimised, working with the Home Office, Director of Labour Market Enforcement, and the devolved administrations</p>	<p>Set out proposals to enhance GLAA operations in devolved administrations</p>	<p>Work with Police, and Officials in devolved administrations to develop proposals where legislative change is required</p>	<p>Implement supported proposals to enable a consistent operational delivery across the UK for all labour market offences</p>	<p>Director of Strategy / Director of Operations</p>
<p>Identify from the GLAA's increasing case load how it can further positively impact the UK response to forced labour through its prevention activity and assessing the benefit that may accrue from further growth of the GLAA resources, to enhance the flexibility and availability of GLAA officers to respond to demand. Such business cases will have regard to options for increasing GLAA capability and capacity, taking into account collaborative work and the potential for increased efficiency.</p>	<p>This action is dependent on levels of demand and associated work options, which should also include how the GLAA can harness or work through the regulatory remit of other partner organisations. Business cases will be dependant on annual analysis of resources versus caseload and positive outcomes</p>			<p>Chief Executive</p>

Activity	2018-19	2019-20	2020-21	Responsibility
Develop a cadre of dedicated prevention officers for each UK high risk sector to raise awareness, educate and generate increased actionable intelligence	As part of the review of capacity identify whether specific industries require a dedicated prevention officer	For each industry sector where the GLAA determines a prevention officer is required develop a business case, examining alternative funding streams – to be undertaken annually in relation to new and emerging risk sectors		Chief Executive / Director of Strategy / Head of Finance
Develop protocols with high risk industries, create industry-led code of practice, and examine alternative regulatory models, and the evidence for expanding licensing across the labour market	Obtain stakeholder support for protocols and alternative models in: <ul style="list-style-type: none"> • Textiles • Construction • Car washes • Nail bars 	Secure expansion of stakeholder support for existing protocols / alternative regulatory models; consider new protocols and alternative models in new and emerging sectors	Undertake three year review of the effectiveness of alternative models, and increased intelligence, to determine whether the experience supports or otherwise expansion of licensing, feeding such analysis into the ODLME strategies	Director of Strategy / Director of Operations
Examine how engagement with faith groups, migrant communities, and support from financial institutions can raise awareness and deliver a cross-cutting pressure for legal compliance,	Within the Prevention plan for each year identify specific cross cutting activities for development, to determine effectiveness through enhanced intelligence levels arising from improved engagement, and from financial prevention activity. In 2018-19 focus is on the Clewer (Church of			Director of Strategy / Head of Communications

Activity	2018-19	2019-20	2020-21	Responsibility
increasing the risks for exploiters irrespective of industry sector	England) initiative; Romanian community, Insurance industry			
Work with the wider stakeholders and enforcement partners, to generate a range of communications and media products and campaigns that raise awareness of forced labour, and deliver a behavioural change in users of services where exploitation is uncovered	Each year: Analysis of intelligence referrals, sectors, investigation outcomes in each year's strategic assessment will inform priority sectors and/or geographical areas for developing communication campaigns, engaging with partners in the NCA/Home Office/Police to assess how a joint approach can enhance the penetration of communication products			Director of Strategy / Director of Operations / Head of Communications
To assess and illustrate how the GLAA's media strategy has played and will play an integral role in reducing/eradicating labour exploitation across the UK economy	In each year review increased intelligence and activity arising/prevented, including increased industry contact, from communications activity in specific areas, or on specific cases, and revise priorities/locations and communications methods based on those identified to have penetrated industries and communities most effectively.			Executive Management Team
Work with Government Departments to examine whether existing (but unused) and new sanctions can be introduced. To include commencing the use of those already in existence, but that have limited use so far, to increase the array of sanction outcomes available to the GLAA. To ensure sanctions chosen maximise the	Explore appetite for access to existing sanctions with the Better Regulation Executive and assess successful approach to use of LMEUs /	Work with BRE and OGDs to assess business case for access and use of the Regulator Enforcement and Sanctions Act 2008 (RESA) sanctions, with	Review approach subject to agreement on wider sanctions	Director of Strategy / Director of Operations

Activity	2018-19	2019-20	2020-21	Responsibility
<p>impact on the offender, and generate an effective deterrence effect, to provide greater protection against exploitation.</p>	<p>LMEOs</p>	<p>proposals to the ODLME where appropriate, setting out how they would be used in the operational context</p>		
<p>To be responsive to the ability to deliver a regional service, with public points of contact, by assessing opportunities for co-location of staff within other Government enforcement or police premises, or independent premises for GLAA officers, with appropriate access to dedicated interview and evidence repository facilities</p>	<p>Review location of existing home based staff, and accessibility of enforcement partner accommodation</p>	<p>Assess costs and efficiencies to be potentially derived from co-location in existing partner offices</p>	<p>Revise GLAA estates strategy</p>	<p>Chief Executive / Head of Finance</p>
<p>To review the GLAA's ability to establish a trading fund status for any external training delivery, and seize opportunities from new project funding sources, for equipment and secondments, as previously accessed to create the e-forensics laboratory, and support secondments of officers from other</p>	<p>Identify activities where trading fund status may assist GLAA to self-fund learning and development activities, and generate income for further</p>	<p>Identify continuing EU funding for secondments from/to GLAA with other member states labour inspectors to combine with Europol action</p>	<p>Implement alternative trading fund approaches with appropriate commercial partners that support expansion of external learning and development</p>	<p>Director of Strategy / Head of Finance</p>

Activity	2018-19	2019-20	2020-21	Responsibility
labour inspectorates.	resources, as well for cross-border or other technological enhancements	weeks.	activity, and the GLAA's ability to raise awareness and prevention of modern slavery	
In response to demand, develop a cadre of operational victim care support officers	As part of the review of capacity identify whether increased victim identification requires dedicated support staff or specialist training for current staff	Develop and implement a review of specialist skills and background required for victim support officers, and develop an associated business case for dedicated officers	Undertake specialist recruitment where a clear need and business case for expansion of a specialist cadre has been established	Chief Executive / Director of Operations / Head of Finance

7 Measuring Outcomes

- 7.1 In the Business Plan we set out the five key performance questions to test whether the GLAA has been successful. These are:

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?
KPQ 3	How effective is the GLAA at working with partners to tackle labour exploitation and modern slavery?
KPQ 4	How effective is the GLAA at working with businesses, 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?

- 7.2 These key questions inform the GLAA's performance measures so that it can quantify its effectiveness. As new areas of business move forward and are added to the business plan, from the previous year's strategic plan, and from external reports (see paras 1.3-1.5) further reviews will strive to determine what new measures are required to measure successful outcomes effectively.
- 7.3 In the early years of the GLAA's expanded remit we recognise that our activity may assist in further exposing the true nature and scale of labour exploitation in the UK. It is clear that its size, where, and how it operates is not definitively known. Therefore the evidence base derived from operational experience may suggest increasing levels of exploitation, and assist in revising estimates of victimisation created by forced labour. This should not be considered to suggest a lack of success but conversely the increasing ability to determine the true levels of exploitation. Only when it is established what constitutes 100 per cent can the GLAA consider a success measure that may consider a percentage reduction as a measure of its success in future years.

8 Summary

- 8.1 This strategy for 'protecting vulnerable and exploited workers 2018 - 2021' 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.
- 8.2 Feedback is greatly appreciated and further explanation as to any aspect of this strategy can be given by contacting:

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