



Gangmasters &
Labour Abuse Authority

GLAA Strategy for Protecting Vulnerable and Exploited Workers – 2019-22

June 2019

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 whether financially, physically and or through coercion and control
- 1.2 This strategy builds on the 2018-2021 GLAA strategy approved by Home Office in 2018. Whilst the GLAA strategy is reviewed and updated annually the anticipated changes to the labour market and its regulation, resulting from Brexit and the implementation of accepted recommendations from the Taylor review set out in government's Good Work Plan, are likely to necessitate a fuller strategic review in the coming year (See section 5).
- 1.3 This 'Strategy for protecting vulnerable and exploited workers 2019 - 2022' seeks to illustrate a clear framework by which the GLAA will:
- continually improve across all aspects of performance,
 - enhance public and stakeholder confidence, and
 - most importantly, work in partnership to protect vulnerable and exploited workers.

Purpose

- 1.4 The purpose of this Strategic Plan is to set the direction for the GLAA identifying planned activity to improve the effectiveness of the organisation and its contribution to the UK effort to prevent and detect labour exploitation. Each year the GLAA revises and produces its Strategic Plan covering a three-year period. It also produces a more detailed Business Plan annually, focusing on the activities planned for the first year covered by the related Strategic Plan. The Strategic Plan and the Business Plan reflect the current key risks and challenges for the operational environment in which the GLAA operates including new employment legislation, impacts from Brexit and opportunities arising from reviews of the Government's approach to labour market enforcement to tackle labour abuses.

Influences and assessments

- 1.5 In the development of this Strategic Plan the GLAA has had regard to external reports on the labour market and its regulation:
- Recommendations for the GLAA in the Director of Labour Market Enforcement's annual strategy, as accepted by Government
 - Independent Anti-Slavery Commissioner's strategic plans
 - The National Crime Agency's annual National Strategic Assessment of Serious and Organised Crime

- The UK Government assessment of key priority countries on high risk migration routes
- Major structural changes affecting the labour market such as the impact of Brexit
- New labour law changes arising from the Government's response to the Good Work Plan; and
- The potential impact of conclusions of the consultation on a single enforcement body for the labour market
- Global best practice on the pursuit and prevention of labour exploitation, developed by international partners

Our Strategic Plan also reflects the following internal assessments of high priority areas of operational risk, and the evaluation of the GLAA's performance:

- The GLAA Annual Strategic Assessment on labour exploitation
- 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) and the National Audit Office,
- Reports from Migration Advisory Committee, Low Pay Commission, where such reports illuminate issues relevant to the GLAA's ability to meet its overarching aim
- Internal reviews and reports in particular those carried out by the Government Internal Audit Agency

1.6 These reports will inform the priorities and approach the GLAA considers is appropriate to continue to ensure it pursues and prevents exploitation, whilst enhancing the protective support to victims.

1.7 In particular the GLAA's Annual Strategic Assessment informs its priorities and whether activity in relation to a particular industry sector is effective, and whether the GLAA should change its focus to other sectors where evidence suggests increased levels of exploitation are being detected. The Director of Labour Market Enforcement's strategy, which concluded greater assistance and guidance to employers is required to assist them to develop and maintain compliance with the law, will also inform prevention activity.

1.8 Where the Strategic Plan identifies that the current year's priorities, objectives and/or activities need to change for the next business year, these changes will be reflected in detail in that Business Plan and reported against in the Annual Report and Accounts relevant to that year's Plan.

Our strategic objectives

1.9 Against this background our current strategic objectives are:

One	Identify and support victims of labour exploitation
Two	Maintain a credible licensing scheme, creating a level playing field, and promoting compliant business growth
Three	Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation
Four	Disrupt and deter criminal activity within the labour market
Five	Develop our people and culture in line with the GLAA's PROUD* values, ensuring a diverse, resilient and change-ready organisation
Six	Provide efficient and effective services, sound governance, robust risk management and value for money

* PROUD = (Professional, Respect, One Team, Utmost integrity, Doing it differently)

Further information about each of these objectives is set out in section 4 below.

Governance

1.10 The GLAA CEO, as Accounting Officer, is responsible for ensuring that public money is managed effectively, that it funds the right activity and that the right levels of resources are used to deliver the planned priority activities. The GLAA is under the oversight of its Board. Board members are appointed by the Home Secretary and operate in accordance with the GLAA Framework agreed with the Home Office. More information about the Board can be found [here](#).

1.11 Assurance to the Board and the CEO of the effectiveness and appropriate targeting of GLAA resources is provided by external oversight, which includes the National Audit Office and Her Majesty's Inspectorate of Constabulary Fire and Rescue Service (HMICFRS).

2 What we do

2.1 The GLAA is the UK leader in the investigation of forced labour, enabling it to deliver its core objective of protecting workers from exploitation. In doing so the GLAA is positioned as the foremost agency in the UK for disrupting and preventing labour exploitation and to continue to be recognised internationally for excellence in this field.

2.2 Our mission is challenging and complex. Labour exploitation and modern slavery have been identified as a national threat as well as an international problem. Our own

assessment of the wider UK labour market has identified a number of high-risk sectors employing some 10 million workers (GLAA Strategic Assessment 2019-20).

- 2.3 Our role is to protect vulnerable and exploited workers. Through the intelligence we receive from our inspections, the public, industry and other government departments, we investigate reports of worker exploitation and illegal activity such as human trafficking, forced labour and illegal labour provision, covering the following offences:
- Gangmasters (Licensing) Act 2004
 - Employment Agencies Act 1973
 - National Minimum Wage Act 1998
 - Parts 1 and 2 of the Modern Slavery Act 2015
- 2.4 The expansion of our scope of operations across the wider labour market in England and Wales, supported by additional enforcement powers is now fully embedded in the GLAA's business model. It continues to deliver a model that is built on intelligence analysis, and the effective interaction between civil and criminal powers which allows us to deploy the most cost-effective deterrence to serious labour market abuse up to the level of forced labour. Furthermore, the scope of our operations uniquely positions the GLAA with its range of powers, and wider remit, to coordinate and lead multi-agency operations against allegations of labour exploitation in its many forms.
- 2.5 We investigate all aspects of labour exploitation in England and Wales utilising additional powers in the Police and Criminal Evidence Act 1984. We also work with partner organisations such as the police, the National Crime Agency and other government law enforcement agencies to target, dismantle and disrupt serious and organised crime across the UK. However, we do not currently have equivalent powers in Scotland or Northern Ireland where we only operate functions under the Gangmasters (Licensing) Act 2004.
- 2.6 A cornerstone of our work to increase effective outcomes, and improve protection for workers, continues to be how we work in partnership with others. This includes HMRC, Employment Agency Standards, police and other law enforcement partners, the Health and Safety Executive, other Government Departments, and local authorities. The organisations we partner with depends on which agency is best placed to support specific activities, coordinating our investigative approach to deliver a unified response wherever possible.
- 2.7 We will continue to explore how we can deliver a consistent enforcement capability across the UK working closely with colleagues in the devolved authorities. Whilst our powers currently only enable a wider enforcement role beyond the regulated sector in England and Wales our prevention activity is not similarly constrained, and we will continue to work to enhance awareness and prevention of exploitation across the UK.
- 2.8 We will continue to work with, support, and encourage, legitimate business on how to prevent, spot, and report suspicions of malpractice that result in exploitation of workers.

- 2.9 We will work to ensure that our Prevention activities engage with stakeholders across industry and worker representative groups to raise awareness of how to identify and report potential forced labour situations. Stakeholder engagement remains at the core of the GLAA's Prevention programme. This programme aims to make UK business and worker groups more aware of what constitutes exploitation and how to report such cases. Our engagement with specific groups will reflect our priority industry sectors for intervention. This approach is aligned to the developing stakeholder strategy and evaluating its effectiveness. 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.
- 2.10 The GLAA is widely recognised for its work in the licensed sector of the labour market. However, we intend to expand our effectiveness in the wider labour market incrementally, illustrated by our work with the construction and textiles industries, and our developing approach to hand car washes and nail bars. The changing nature of the labour market and recruitment methods in the 21st century requires the GLAA to remain adaptable and identify risks and solutions to new methods of exploitation maintaining the trust and confidence of those being exploited.
- 2.11 Through our successes we aim to build confidence in the GLAA so that workers are prepared to report abuses suffered. We will measure our success in coordinating and leading investigations into labour exploitation, preventing and tackling exploitation, and safeguarding vulnerable people. By putting victims first, we will ensure that they receive the best possible outcomes and the relevant support to meet their specific needs from our partners whilst bringing offenders to justice.
- 2.12 The GLAA will continue to support the police forces of Scotland and Northern Ireland in their investigations into forced labour offences. In tandem with the proposed consultation on a single enforcement body the GLAA will work with the devolved authorities to explore the scope for change that would enable a consistent and aligned enforcement landscape to operate throughout the UK.
- 2.13 The GLAA undertakes national and international activities to enhance awareness of labour exploitation, and forced labour, and prevent such practices infiltrating supply chains within, and to, the UK. This will be increasingly important as the UK's role in global markets evolves after the UK's departure from the EU, where supply chains may be outside the UK. We recognise that recruitment from outside the UK into the UK may increase the risk of labour exploitation impacting the likelihood of exploitation within the production of UK goods and services. We will work to ensure that our Prevention activities raise the awareness of such risks for UK businesses.
- 2.14 We will maintain our successful and widely recognised licensing scheme which regulates businesses who provide workers to the fresh produce supply chain and horticulture industry, and shellfish gathering activity, to make sure they meet the employment standards required by law. We will also continue to examine any proposals for the expansion of statutory licensing but also alternative models of regulation of industries outside the current licensable sector,. The Responsible Car Wash Scheme, which GLAA helped to develop and which includes inspections

similar to those which GLAA carries out in its regulated sector, may provide a model for other industries.

2.15 We adopt a proportionate approach to the use of sanctions. Where non-compliance with licensing standards occurs, this can result in adding conditions to a licence or, if the non-compliance is serious, revocation of a licence. Where we investigate criminal offences, we consider whether prosecution is appropriate. We will also consider whether alternative or additional (to accompany a prosecution sentence outcome) sanctions should be used. They 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)

2.16 We exercise a statutory first responder role, referring potential victims of modern slavery who consent into the National Referral Mechanism (NRM), to ensure that they receive appropriate support. We also 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.

2.17 Communications and engagement activity, underpinned by GLAA intelligence, will support the key operational and prevention priorities, and in 2019-2022 will be focused particularly on activity across employment sectors considered to be at highest risk of labour exploitation. This will include supporting targeted campaigns developed by the Home Office and others across Government, and NGOs, aimed at educating and influencing behaviour change and making it easier to report issues of concern. Recognising the need to influence campaigns as well as run them, where appropriate, subject to funding, the GLAA will provide its expertise and content to NGOs and cross Government departments to assist delivery of the Modern Slavery Strategy.

3 Enabling the effectiveness of our response

- 3.1 The GLAA will critically review its organisational approach on an annual basis to assess opportunities for efficiencies to maximise its impact, and particularly using our resources in the most effective way, whether that is through direct intervention or by educating and influencing others to improve impacts through the support of other stakeholders. It will also assess where and how its impact may be enhanced by increased resources. Where the GLAA considers there is a strong argument for growth, it will work with partners to prepare cases for consideration by government.
- 3.2 Internally, the GLAA will work towards maintaining a flexible, knowledgeable and skilled workforce, developing specialist skills where required, and investing in the future of our people. As an organisation, we will consider future recruitment needs to enable continuity and adaptability in the face of changing risks. We will assess what new skills may increasingly be required to assist, for example, digital investigation. Such skills may increasingly be required as the nature of work, and the methods of recruitment, change in the 21st century. This will also underpin our work to develop new investigators “from the ground up” through, for example, trainee and/or apprenticeship schemes.
- 3.3 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 ensure that the pressures for compliance are maintained within the licensing sector. 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.

4 Our Strategic Priorities

- 4.1 Over the course of the Strategic Plan 2019-2022 we will take the following approach in relation to the six strategic objectives:

Identify and support victims of labour exploitation

- 4.2 The GLAA exists to protect workers from exploitation. The GLAA has a statutory duty to identify potential victims as set out in [section 52 of the Modern Slavery Act 2015](#). A crucial aspect of our work therefore aims to support workers who may be victims that we identify through our operational activity. Raising awareness of workers’ rights, and how to report abuse to the GLAA is a key element of this strand of activity. Our activity will consequently consider how we can improve the support we can provide to potential victims and measure how our activities support both prevention and investigation to assist exploited workers.

Approach

- Work closely with victim support organisations to ensure that GLAA operations, and identified victims, receive immediate support, and as increased levels of victims and demand on GLAA resources are identified drive evidence-based improvements to victim support processes and infrastructure
- Evaluate and build on GLAA's media strategy so that it plays an integral role in reducing/eradicating labour exploitation across the UK economy
- Consider the role that GLAA stakeholders can play in the identification of victims and promotion of worker rights

Maintain a credible licensing scheme, creating a level playing field, and promoting compliant business growth

- 4.3 Our licensing framework has been the foundation of our approach since 2006. It fulfils the objective set when the legislation was proposed: to create a framework to prevent exploitation of workers. We aim to do so in a manner that improves compliance by licence holders but enables compliant business to thrive economically. We will continue to maintain this benchmark ensuring that our regulatory approach, and the costs to business of it, does not create burdens for the compliant, but enables effective action against those who are, or intend to be, non-compliant.

Approach

- Undertake a review of the effectiveness of the 2018 changes to the licensing standards.
- As part of the next scheduled review, to incorporate such changes as may arise from new legislation stemming from the Good Work Plan
- Undertake a review of licence fees to ensure that fee levels are appropriate, not excessive, or deter companies from applying, but are set at a level that properly supports GLAA operational activity
- Evaluate the effectiveness of the licensing scheme to date and options for future regulation that can promote compliant business growth in sectors beyond the currently licensed sector.

Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation

- 4.4 We recognise that even though our resources have increased we cannot tackle all allegations of forced labour, and other forms of labour market abuse, through investigation. There will always be a need for investigation, sanctioning criminal behaviour, up to and including prosecution. However, our prevention programme is necessary to reduce the investigative burden and change business behaviours. It will raise awareness amongst our stakeholders, to assist in finding innovative solutions to harness business and NGOs to create pressures for compliance. As prevention is better than cure it has a practical application in ensuring that we reserve the deployment of our investigators to the most severe allegations of abuse. Working with stakeholders, and supporting their due diligence is a key activity to improve action against forced labour.

Approach

- Use the evidence and analysis from strategic assessments carried out by the GLAA and other law enforcement bodies, together with evaluation of similar preventative activity, to inform a coordinated and effective approach to preventing labour exploitation.
- Enhance preventative awareness within high risk sectors and explore different approaches to engaging with workers to raise awareness, educate and generate increased actionable intelligence
- Explore and evaluate alternative regulatory and industry led schemes focusing on high risk sectors, to build sustainable approaches to prevention in ways that secure high levels of support from compliant businesses.
- Examine how prevention can be increased through longer term projects in partnership with faith groups, migrant communities, through third party financial industry pressures and continued international engagement as the global labour market changes.
- Consider how GLAA prevention activity needs to evolve considering labour market changes, shifting recruitment practices, and employment models, through increased use of technology in recruitment
- Work across Government with enforcement bodies, including through opportunities that may arise from the establishment of a single enforcement body, to enhance collaborative engagement with business to prevent labour exploitation in supply chains.

Disrupt and deter criminal activity within the labour market

- 4.5 Prevention will never stop unscrupulous operators from acting criminally. We will continue to develop our operational response, assessing how we can work more effectively with our enforcement partners, to ensure that prosecution, and other sanctions, provide an effective deterrent to others who seek to operate illegally.

Approach

- Continue to pursue relentlessly those who exploit workers and those who are vulnerable to exploitation using a range of civil and criminal powers and orders available to us, whilst keeping the use of those powers under review and evaluating their relative impact.
- Review the intelligence assessments of high risk activity, and hot spots geographically, to ensure that the enforcement approach maximises investigation outcomes, and the protection of vulnerable individuals
- Consider how to improve responsiveness locally and regionally including assessing opportunities for co-location of people within other Government enforcement or police premises and opportunities for shared access to facilities and capabilities that can support investigation and enforcement activity.
- Consider the potential for improving the suite of enforcement powers available, including through opportunities that may arise from the establishment of a single enforcement body, and continue work with the devolved authorities to apply a consistent approach across the different UK legal jurisdictions.
- Develop capabilities that allow the GLAA to enhance its effectiveness in investigations and deterrence, including E forensics and financial intelligence.

Develop our people and culture in line with the GLAA's PROUD* values, ensuring a diverse, resilient and change-ready organisation

- 4.6 Whether our activity is in prevention, compliance or investigation, this objective recognises the importance of investing in our workforce so that those delivering and supporting our operations can maintain an effective service. The organisation will need to become increasingly resilient and diverse to equip it for future changes, and for our culture to develop in line with the organisation's core values so that our people are able to develop and deliver to their full potential.

Approach

- Develop and implement a programme of culture and organisational change that is shaped by our people, aligns with the changing role of the authority and prepares us for future demands.

- Develop and embed workforce plans that provide the learning and development, recruitment and retention, and talent management measures needed to continue equipping our people to deliver priorities as set out in our Strategic and annual Business Plan
- Prepare and deliver actions for building up our talent pipeline for the future through an appropriate blend of trainee, graduate and apprenticeship schemes, working with partners to establish mutually beneficial approaches.
- Create a progressive, collaborative and healthy working environment which is conducive and beneficial to all GLAA people throughout their career with GLAA

Provide efficient and effective services, sound governance, robust risk management and value for money

4.7 Underpinning delivery of all its objectives, the GLAA will continue to provide effective services based on sound decision making and management of risk. We will continue to examine how we can make these functions responsive and effective and we will look for innovative ways to transform our services and increase value for money.

Approach

- Develop a medium term financial plan that places the organisation on a sustainable footing, recognising the growth in demand, and fully explores options for greater financial self-sufficiency
- Continue to review and improve internal processes and policies to enable services to deliver effectively and sound decisions to be made across the organisation.
- Embed robust risk management across the organisation, ensuring that people are operating safely and that emerging risks are captured and mitigated effectively.
- Consider the use of technology and other approaches for transformation within service delivery to improve outcomes in terms of both value for money, partner/customer and employee satisfaction.

5 Changes to the labour market

- 5.1 As the first year of the period of this strategic plan progresses significant changes are anticipated which may affect labour market enforcement, and the approach of the GLAA. We will respond and update this plan where such changes come to fruition. The following paragraphs highlight such changes.
- 5.2 Changes to requirements on employers including new employment legislation are likely to require changes to the licensing standards in advance of its planned triennial reviews (the next being due in 2021). In turn this will create new areas to evaluate in compliance inspections and increase the training needs of our inspectors.
- 5.3 Consultation on changes to the labour market enforcement landscape, and other proposals from the Good Work Plan, including whether a single labour enforcement body should be created would create organisational and personnel policy challenges for the GLAA. This might result in the need for significant organisational change and operational approach whilst we maintain our preventative and investigative effort through any periods of transformational change.
- 5.4 Whilst we will maintain our relationships with EU labour inspectorates to tackle cross-border recruitment we will need to assess how that relationship may change in a post Brexit environment. We will need to assess the extent to which international liaison is assisted by the creation of a European Labour Agency or whether access to the UK labour market by non-EU countries presents new international cross border liaison requirements with enforcement bodies in those countries. We will need to ensure that a recruitment company, based outside the EU, which may legitimately supply workers to the UK, is operating legally, and that associated licence decisions are informed, robust, and sustainable. We will respond to the challenges that may be presented by future immigration policies, and access to the UK labour market for migrant labour from beyond the EU, to ensure that such workers are not exploited.
- 5.5 We will test the labour market's appetite for self-regulation, and the effectiveness of such approaches. Our evaluation of the current car wash scheme, and work in the nail bar industry will inform whether similar approaches should be encouraged in other industries through our wider labour market engagement. Alternatively, the evaluation, and other labour market changes, may support arguments for an expansion of statutory licensing. Therefore, in our assessment of licence fees we will be alive to whether such fee structures may be appropriate across wider industries, as well considering the scalability of our licensing systems to meet the challenge of increased application volumes. Where this occurs, we will benchmark our approach against other licensing authorities, learning from their experiences.

Appendix 1: Our Current GLAA jurisdiction and powers

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		