



Gangmasters &
Labour Abuse Authority

Business Plan 2019-20

June 2019

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1. Introduction

- 1.1 This document, underpinned by the Gangmasters and Labour Abuse Authority's (GLAA) Strategic Plan 2019 – 2022, sets out our aim, strategic priorities and objectives for the coming year. It provides a clear framework for the delivery of services where the exploitation of workers can be prevented, those who are abused can be protected and those who exploit can be relentlessly pursued using all legal and ethical¹ means.
- 1.2 The GLAA Board is satisfied that this plan enables delivery and the means to ensure the authority's aim, priorities and objectives continue to be met. Furthermore, the plan supports the Home Office's objectives to:
- Cut crime and the harm it causes, including cyber-crime and serious and organised crime
 - Protect vulnerable people and communities
- 1.3 On behalf of the Secretary of State, the Board will continue its oversight role to make sure the GLAA delivers a cost effective and efficient service whilst increasing activity to prevent exploitation, protect workers, address unlicensed activity and support licensed businesses to know what they need to do to remain compliant.
- 1.4 The purpose of this plan is to:
- Describe the key areas of activity that will support delivery of the GLAA's strategic objectives during 2019-20
 - Set out the key deliverables that will contribute to those objectives and are achievable within the budget set for the authority
 - Define the measures that will be used to track performance against those objectives, report progress and enable the authority to be held to account
 - Provide visibility to our colleagues, operational partners, wider stakeholders and the public about our activities and our impact
 - Place the objectives for the authority within the wider strategic context, in particular demonstrating alignment with the strategy set by the Director of Labour Market Enforcement
 - Outline the continuing work that will be undertaken to ensure the GLAA remains fit for purpose in delivery of its recently expanded remit and is an organisation prepared for further change.
- 1.5 Looking ahead to 2019-20 [and beyond], the plan also demonstrates how the GLAA's approach would be central to the effectiveness of a single labour market enforcement body, on which the Government will be consulting. The establishment of a new body would offer an opportunity to enhance the protection of vulnerable and exploited workers.

¹ The GLAA regularly identifies business practices that might be interpreted as legal but operate in a manner that potentially exploits workers. Such business models are unethical and are considered to be evidence of not being "fit and proper". They can include the operation of tax avoidance schemes and withholding holiday pay.

2. Strategic context

Our aim, strategic priorities and objectives

2.1 As set out in its current strategic plan, the GLAA's overarching aim is:

'Working in partnership to protect vulnerable and exploited workers'

2.2 This will be achieved through 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

2.3 Underpinning this the GLAA has six strategic objectives that form the framework for this business plan. These have been revised since the 2018-19 business plan to simplify those relating to external delivery and to reflect the work being undertaken to drive further organisational improvement.

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)

Context and challenges

2.4 The wider context within which the GLAA's priorities are set is covered within its 3-year strategic plan. This includes an overview of the partner strategies, reviews and assessments to which the authority has regard in developing its strategy. Of particular note for producing this business plan are the annual strategy produced by the Director of Labour Market Enforcement and the government's response to this (published in December 2018), as well as the government's Good Work Plan (also published in December 2018), a vision for the future of the UK labour market

that includes its response to the independent Taylor Review of Modern Working Practices.

- 2.5 As well as key partner and government strategies, the GLAA's activities are informed by the wider labour market landscape and economic conditions, both domestic and international. In shaping its 2019-20 plan, the GLAA has paid particular attention to changes that are likely to arise from Brexit, reported labour market shortages in risk sectors, new pilot schemes in the regulated sectors, victim support mechanisms, the gig economy and the involvement of organised crime groups. Post-Brexit developments including patterns of worker movement, changes to regulations, international liaison with regard to enforcement and intelligence sharing and wider trading conditions, will be actively monitored to inform the delivery of the objectives in this plan. The focus of such monitoring will be the assessment of changes on worker vulnerability and risk of harm.
- 2.6 The GLAA's response to this context is intelligence-led and risk-focused. This also supports the effective deployment of finite resources. Each year the organisation produces a strategic assessment of the nature and scale of labour exploitation in the UK. The annual assessment draws on the extensive intelligence base gathered by the authority, takes account of changes to the labour market landscape such as those noted above and produces an overview of risk, threat and harm of relevance to the GLAA's priorities. The assessment has been used to shape the business plan and acts as a vital resource throughout the year in setting investigation and prevention priorities. This assessment is an evolving area of knowledge as our wider powers have become embedded and the information received is increasingly from sectors outside of the scope of the licensing regime.
- 2.7 In supporting prevention, focusing on priorities identified from the current assessment, we will continue to work with industry to develop industry-led protocols and standards to raise understanding and enhance due diligence to prevent forced labour penetrating supply chains.

3. Delivery of our objectives during 2019-20

Objective 1: Identify and support victims of labour exploitation

- 3.1 Many victims and exploited workers encountered by the GLAA are already vulnerable due to a number of factors that fall short of action required by statutory authorities. The workers may have, for example, pre-existing financial, physical, social or psychological pressures which, if left unnoticed or not addressed, leave them highly susceptible to being exploited for their labour.
- 3.2 Other vulnerabilities include shared and overcrowded accommodation, unfamiliar surroundings, no or very little spoken English, detachment and isolation from family and friends, third parties holding travel documents, thus controlling movement. These factors can lead to people being susceptible to coercion and psychological control.
- 3.3 The GLAA identifies potential victims of labour exploitation or modern slavery through its compliance and investigation activity and is a designated 'first

responder' (i.e. can refer directly) to the National Referral Mechanism (NRM), the UK's framework for identifying and supporting victims of human trafficking or modern slavery. Where suspected victims of modern slavery do not consent to a NRM referral, the GLAA has a legal duty to submit a notification to the Secretary of State. We are voluntarily supporting the mirroring of this approach in Scotland.

- 3.4 The GLAA has systems in place to support victims through the investigation process and all GLAA colleagues are aware of their individual roles and the requirement to keep victims updated on the progress of allegations and investigations.
- 3.5 During 2019-20 changes to the NRM will be implemented and it will be important for the GLAA to provide structured feedback regarding the effectiveness of those changes, as well as setting out any proposals for any further improvements that would enhance support to victims.

Key Deliverables

- Strengthened relationships with victim services and wider law enforcement to ensure that victims are provided with a high standard of service.
- Identification of key business and third sector partners with whom we can work in partnership to rehabilitate and elevate exploited workers into a 21st century standard of living.
- Increased identification of victims through supporting networks of existing frontline groups (such as NHS, local authorities, DWP etc.) in spotting the signs and providing relevant intelligence.
- Increased understanding of what victims require and improving what we do, contributing to the review of the NRM, increasing the satisfaction in the GLAA's role in victim support and developing options for further support the GLAA could offer.
- Wider public awareness and industry specific campaigns in conjunction with partner organisations, maximising the use of social media, in order to raise awareness of labour exploitation and increase victim identification

Objective 2: Maintain a credible licensing scheme, creating a level playing field, and promoting compliant business growth

- 3.6 The GLAA's licensing scheme has historically worked in partnership with business, labour users and labour providers to drive up standards of employment, in particular in areas of seasonal and temporary labour. This enables business to operate on a level playing field whilst reducing opportunities for workers to be exploited. There are currently high levels of satisfaction among regulated

businesses with the approach and work of the GLAA, representing an endorsement of the scheme and its operation.

- 3.7 The GLAA licensing standards were revised in 2018 and are scheduled to be reviewed again in 2021-2022. However, as part of continuous monitoring of legislative change the GLAA will ensure that changes to employment law and regulations, including any that may arise as a result of the implementation of the government's Good Work Plan, will be reflected in its approach to licensing and compliance.
- 3.8 The GLAA seeks to deliver an excellent service to licence holders at the lowest possible cost, to relieve unnecessary burdens on business but also to maximise the efficiency and productivity of the GLAA, whilst reducing and preventing incidents of labour exploitation. It will continuously review licensing processes, and opportunities to use new technology to enhance the speed and quality of licence holders' experience when contacting the GLAA. In particular, during 2019-20, there is a need to consider system changes to ensure resilience and maximise opportunities for streamlined processes. The model for cost-recovery will also be reviewed and recommendations developed to align more closely with government policy. These developments will build on the sound foundation that a robust licensing regime has been provided for the GLAA and ensure it is ready for any further expansion of licensing in light of developing policy.

Key Deliverables

- Review of the licensing and compliance process in order to identify opportunities to streamline and improve services to applicants.
- New IT platform for the licensing system to deliver further improvements to processes and ensure a resilient foundation for current and future licensing activity.
- Work with partners to assist shaping further proposals for expansion of licensing to other sectors.
- A fully costed business model that accurately assesses the cost of functions to support licensing activities to enable a review of licence fee levels and the development of options for moving closer to full cost-recovery in line with government policy.
- Timely communication of legislative changes affecting licensing standards to licence holders through the GLAA Brief series.
- Support to government departments and provide feedback on the Seasonal Workers Pilot and any further schemes introduced as a result of Brexit.

Objective 3: Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation

- 3.9 A critical part of the GLAA's work is to identify how support can be given upstream, whether in supply chains, or in the recruitment of workers, to prevent worker exploitation. This is supported by the activity undertaken across the authority to ensure awareness of labour exploitation is understood among the wider public.
- 3.10 The annual assessment is used to determine the priority industries, and countries, with whom we need to work. Together with lessons learnt from operational activity, this shapes the partnerships with which we engage in order to ensure effective delivery of our preventative activity.
- 3.11 Building on the work done through our strategic assessment process we engage with businesses where it is assessed there is a high risk of exploitation and other behaviours which put workers at risk. Our work with civil society bodies, such as trades unions and Non-Government Organisations (NGOs), other UK government departments, and overseas partners, will support the capacity and capability to detect and prevent exploitation of workers "upstream", within supply chains, and to protect workers from exploitative recruitment before coming to the UK.
- 3.12 This work is supported by our communications strategy, which also plays an important role in delivering a wider reach into other industries where risks exist but are not currently assessed as of highest priority, identifying our key stakeholders to ensure preventative messages are effectively targeted. Prevention assists in enabling limited investigation resources to be targeted on the highest risk cases and through identifying ways in which industry can play a part in eradicating forced labour from supply chains. Communications further increases the impact and expands the reach of the GLAA's prevention activity by educating the public and stakeholders about the part they can play in helping eradicate abuse of labour.
- 3.13 During 2019-20 our ambition is to become more targeted and proactive in the partnership working, engagement and communications we undertake in order to protect rights and prevent exploitation. Our focus will be on partnership working in priority sectors (based on risk), whilst ensuring wider communications can support other sectors to be prepared and take the initiative. This may lead to some difficult choices and at times having to step away from opportunities and requests to support partners, but will be of benefit in ensuring the correct focus of the authority's finite resources.
- 3.14 In line with the recent government response to the Director of Labour Market Enforcement's strategy, the GLAA will continue to enable and foster compliant business to develop industry-led protocols and standards. This sector-specific partnership work is aimed at sharing information and intelligence, and developing best practice in order to increase standards and compliance with labour laws, thus reducing opportunities for labour exploitation. During 2019-20 we will also work with our partners to begin evaluating the existing protocols and pilot activity already in place in the food supply, construction, hand car wash, nail bar, and textiles industries.

Key Deliverables

- Led by intelligence and focusing on risk, development, delivery and evaluation of a range of industry-led approaches to prevent exploitation including:
 - the Responsible Car Wash Scheme and its code of practice, as it works to assess and accredit good car wash operators
 - the Construction Protocol, as the partnership grows and provides opportunities to embed awareness-raising and prevention within industry practice
 - the development of a standards model to tackle nail bars, informed by work to scope the size of the nail bar industry, building on work in Greater Manchester and activity within the London Boroughs
 - the Apparel and General Merchandise Public and Private Protocol as it works through textiles supply chains to protect vulnerable and exploited workers.
- A structured and targeted approach to stakeholder engagement (locally, regionally and nationally) used to direct prevention activity, influence, and help shape the awareness campaigns of stakeholders to create a broader impact.
- Demonstrate leadership across the sector protocols and pilots by bringing different industry leads together to continuously improve prevention and awareness raising activity with particular consideration of how it can be self-sustaining.
- Scoped out options for further protocols and industry-led initiatives in high risk sectors, identified through the GLAA's annual strategic assessments, where these can be self-sustaining, with a view to implementation during 2020-21. This will include identifying how the financial sector can be utilised to create levers to encourage and create pressure for compliance in areas such as insurance and investment.
- Improved understanding of how the changing nature of 21st century employment and recruitment methods may give rise to additional risks of exploitation and develop options for detecting and preventing abuse in such methods.
- Identification of new international risks, including new risks arising from Brexit, and support to appropriate campaigns with relevant partners, including the Home Office Modern Slavery Unit to ensure international impacts are factored into prevention, and appropriate upstream activity is taken with other labour inspectorates to reduce the potential for migrants to

be exploited before, and in the UK, concentrating on the government's priority countries that feature in GLAA risk assessments.

Objective 4: Disrupt and deter criminal activity within the labour market

- 3.15 The heart of our operational capability is the intelligence gathered and analysed by the authority, and the effectiveness of our enforcement and compliance functions will continue to be underpinned by this intelligence function. It provides an analytical capability to examine allegations of labour market breaches, determine priorities, and provide an annual assessment of the nature and scale of labour exploitation.
- 3.16 The annual assessment we produce identifies major threats and emerging trends in labour exploitation, including offender and victim profiles. That informs the priorities for investigation as well as in our preventative work and wider stakeholder engagement.
- 3.17 The GLAA has invested in its investigative capability and has four operational syndicates across the UK, working closely with our compliance team. The geographic split of the syndicates takes account of the Police Regional and Organised Crime Units (ROCU) which coordinate greater partnership with wider law enforcement, other government agencies and local authorities.
- 3.18 These operational investigative resources are targeted specifically against the 'Pursue' element of the GLAA's strategic approach. Investigating officers are available seven days a week in high harm priority cases to respond to allegations of labour exploitation, abuse and modern slavery. Following the expansion of the GLAA, it is now able to deploy a wide range of civil and criminal powers in order to pursue relentlessly those who exploit workers and protect those who are vulnerable to exploitation.
- 3.19 As the work of the GLAA expands and its understanding of the scale and threat increases, further work will be needed to consider maximising our operational capability and capacity. Demand modelling undertaken during 2018 led to our first ever formal demand analysis. This work will form the basis for the GLAA to identify options for demand management during 2019-20 including identifying processes for efficiency improvements. We will be able to model alternative resource allocations and risk, driving more efficient operational delivery and informing the balance of enforcement and prevention resourcing.
- 3.20 Given these demand pressures, it is vital that the GLAA continues to work closely with a range of enforcement agencies and regulators, in particular the Employment Agency Standards inspectorate and HMRC National Minimum Wage unit, as well as the National Crime Agency and local police forces where more serious offences are under investigation. Options to take this close joint working further will be explored by government as it consults on establishing a single body for enforcement of labour market offences.

- 3.21 Our work to develop a consistent landscape to tackle labour exploitation across the different legal jurisdictions in the UK will continue and will be coordinated with the conclusions from the planned government consultation on the creation of a single enforcement body.

Key Deliverables

- An annual strategic assessment of the nature and scale of labour exploitation to inform future planning and contribute to the activities of key partners, including the Director of Labour Market Enforcement's strategy.
- An annual demand analysis, reflecting the resource pressures from operations, used to review the sustainability of current triage and tasking models to inform the effective deployment of GLAA resources.
- Working with inspectorates and partners, an evaluation of the use of, and compliance with, Labour Market Enforcement Undertakings and Orders, taking appropriate action to escalate or remove such sanctions and continuing to build credibility in their role within the enforcement community
- Evaluation of investigative outcomes to identify the quantum of criminal assets capable of recovery and assess the scope for greater self-funding through development of financial intelligence and investigation capabilities.
- Support for the evaluation of the range of powers and orders to prevent labour exploitation, such as the wider PACE and Proceeds of Crime Act powers, that a single enforcement body would require and the development of proposals for a consistent enforcement approach throughout the UK.

Objective 5: Develop our people and culture in line with the GLAA's PROUD values, ensuring a diverse, resilient and change-ready organisation

- 3.22 Currently the GLAA employees 124 colleagues with around 50 based at its head office in Nottingham and the majority of people working from a home base. Around 85 per cent of the posts provide the authority's core operational functions, with the remainder providing corporate services in support of those operations.
- 3.23 The people within GLAA are a critical asset for the organisation and bring a high level of commitment to delivering our mission. We will only be able to deliver our priorities if there is continuing investment in developing the workforce and ensure the way each of us work is inclusive, capable and flexible. Colleagues need to be equipped with the right skills and the right tools to do their job, as well as being clear about our goals and how each role contributes, and the human resources support available to assist them through change and any personal issues they may encounter.

- 3.24 A People Strategy is already in place and this will be revised and updated during 2019-20, together with a workforce plan that will focus on recruitment, retention, talent management and succession planning within each area of the business. Particular consideration will be given to how apprenticeships, trainee programmes and collaboration with partners with similar skills requirements can form a more sustainable way of meeting our future skills needs.
- 3.25 This work will also be used to improve the resilience within the organisation, recognising the risks that arise from having a number of single points of failure identified through previous internal audit reviews. Our equality and diversity plan will also be reviewed to ensure the authority continues to strive for greater diversity in its people and its thinking.
- 3.26 The annual cycle of performance review and objective setting will be used, together with team business plans, to refresh our training needs analysis and inform our learning and development plans for 2019-20. We will focus on identifying and addressing critical skills gaps across the organisation, recognising the importance of operational delivery, effective corporate services and management and leadership skills.
- 3.27 A renewed emphasis will be placed on demonstrating behaviours in line with our values throughout the organisation. This will feed through into recruitment, performance management, succession planning and management and leadership development. This work will be aligned with further preparation for change, anticipating the impact that economic factors and/or policy impacts may have on the organisation and its work during the coming years.
- 3.28 Our work on values will include an opportunity to review the current values and enable wider discussion throughout the organisation with regards to our culture. This will need to recognise the growth and change that has occurred and engage colleagues in setting the culture within which we will seek to operate. This is likely to require a more transformational approach for the organisation given some of the issues raised within the annual people survey and through external inspection and audit. Consideration will therefore need to be given to a fuller organisational development and cultural change programme, that balances ambition with a realism regarding available resources.
- 3.29 During 2018-19 a People Survey Working Group was established in order to consider areas for improvement in response to the 2018 People Survey results. Engagement with this group will continue and a range of further activities and approaches will be put in place to increase the levels of engagement in the organisation, including a People Seminar in September 2019. The working group will also enable support to the implementation of transformational proposals to enhance the culture and values of the organisation.
- 3.30 This approach to engagement will be complemented by the work undertaken through internal communications. This function is particularly important in ensuring our dispersed workforce receive consistent messages, and are aware of changes that impact them, enabling them to discharge their responsibilities effectively.

Internal communications will use a range of tools to achieve this including the use of video on our new intranet.

Key Deliverables

- A revised People Strategy and set of workforce plans for each business area outlining key learning and development requirements, recruitment and retention approaches and succession plans
- Consideration and implementation of as many proposals as possible from the people survey working group.
- Development and commencement of 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 a refreshed training needs analysis and learning and development plan, drawing on a range of sources including the annual review process, team business plans, analysis of new starters and lessons learnt reviews within service areas.
- Deliver leadership and equality training and support to our managers in promoting equality as part of their roles and putting inclusive leadership at the heart of delivery.
- Deliver a range of engagement activities, including the annual people seminar, making use of the new intranet and other digital tools and internal communications in order to impact positively on productivity, morale and culture.
- Scoping for an apprenticeship and/or trainee programme, working with partners, that will enable future skills needs to be met from a wider range of people.

Objective 6: Provide efficient and effective service, sound governance, robust risk management and value for money

- 3.31 The GLAA is funded by the Home Office, including through Northern Ireland Departments for our operational delivery in Northern Ireland, and through licence fees, which do not currently provide full cost recovery. Some further modest cost recovery is achieved from the delivery of external training provision, and, over time, we hope to develop a revenue stream from recovered criminal assets. We will also look to support from partners, and other government project funds, to support project activity and campaigns with particular business sectors and communities.
- 3.32 The delivery of our business plan for 2019–20 is dependent on our budget for the coming year. Throughout the year effective governance of the finance functions

will ensure expenditure is effective and appropriate, and reported regularly to enable expenditure decisions to be made and revised throughout the year. Given the demand pressures outlined above, it is critical that effective budget and forecasting processes are in place and during 2018-19 further investment was made in the authority's financial management capabilities to support this. However, we recognise that not everything that needs to be done may necessarily be possible within existing resources. We will ensure that effective governance of resources is supported by risk review and constant re-evaluation of priorities within the financial year. This will include providing a sound audit trail for any decision to stop particular activities due to re-prioritisation.

- 3.33 In order to continue delivering against our mission, work to drive savings and efficiencies will continue into 2019-20 with the aim of re-setting a sustainable budget for recurring costs in the medium term. This work will be done through engaging with all teams throughout the GLAA who are best placed to suggest areas for improvements, efficiencies and savings.
- 3.34 Given the increasing reports of exploitation being received by the authority, work will also be undertaken, drawing on our assessment of future demand, to inform options for making the case for additional capacity. This is likely to particularly consider prevention, safeguarding, and investigative analytical specialisms (e.g. financial investigation and digital forensics). Where we identify a need to increase GLAA resources we will develop a clear business case to enhance the GLAA's capabilities and set out clearly the potential benefits for vulnerable and exploited workers. This work will take account of opportunities that may arise from the government's spending review in 2019 where collaboration with partners and across departments could provide new models for sustainably funding the vital work required to tackle and prevent labour exploitation.
- 3.35 As noted above, during 2019-20 the GLAA will review its licensing fees. The fees the GLAA charges have not changed since 2009. The GLAA will ensure that the licensing regime continues to provide a cost-effective regime, moving as close to full cost recovery as is possible. Wide ranging business and public consultation will take place and any changes will be made in line with the appropriate government and parliamentary processes.
- 3.36 In recent years the GLAA has secured capital funding from the Home Office to support its transition to a new IT infrastructure and address key risks around legacy IT systems. This transition work will continue into 2019-20 with a particular focus on systems that support our statutory licensing function.
- 3.37 As well as sound financial management, the authority will continue to develop and improve its governance and risk management during 2019-20. Processes for decision making within the executive will be reviewed and any changes required implemented in order to provide sound governance, informed by issues identified in previous internal audit reviews. Further work will also be undertaken to identify any areas where internal policies are either lacking or in need of substantive revision.

- 3.38 Good progress was made during 2018-19 to strengthen the approach to risk management across the authority and 2019-20 will be used to embed and enhance this. This will ensure that the strategic and team risk registers are focused on mitigating key risks and increase overall operational effectiveness.
- 3.39 The Home Office grant funding for GLAA activity during 2019-20 is expected to be the same as that provided in 2018-19, i.e. £7.1m. Income from licence fees is also forecast to remain constant (£0.9m). This means that our operating budget will not grow and therefore cost pressures, such as inflation and pay increases, as well as managing rising demands will need to be offset by efficiencies and savings within the authority. An increase in employer pension contributions of £0.2m is expected to be met from funding still to be allocated by the Home Office. As set out in the table below, the resources required to deliver the business plan are forecast to be £7.4m, which means a small forecast deficit of £300k. Work is underway to identify areas for potential savings, including; vacancy control, reduction to travel and subsistence budget, interpreters and accommodation budgets. Project costs associated with critical IT investment will be subject to approval of capital bids and at this stage we are only able to estimate the associated level of revenue costs that will be incurred during 2019-20.

Cash Expenditure	2019-20 (£'000)
Employee	5,348
Contractors	250
Other Employees	90
IT Costs	654
T&S	504
Other	534
Total	7,380
Funding	7,100
Shortfall	280

- 3.40 In order to manage budget pressures in-year, the business plan will be used to guide decisions regarding expenditure, including those relating to staffing vacancies. The deliverables associated with each objective have been set out broadly in priority order, therefore providing a further indication of how difficult decisions on resource allocation will be made in the event that choices between business plan activities are required. There are also activities set out that are designed to mitigate the rising demand pressures facing the authority, as well as those that may lead to growth in the event that a strong case can be made in line with the mission of the authority.

Key Deliverables

- Development and delivery of in-year efficiencies and savings for 2019-20 to ensure expenditure is in line with the level of available funding whilst minimising the impact on the delivery of strategic objectives.

- Medium term financial plan with a sustainable level of recurring costs, using work to identify efficiencies to re-invest in the delivery of the authority's strategic priorities.
- Business case/s for future growth with a particular focus on spending review opportunities and timescales, ensuring that these are realistic by way of costs and clear in terms of benefits for vulnerable and exploited workers.
- Identification of organisational policies requiring development or revision and implementation of a programme to address those gaps. This will include a clear pay policy developed through engagement with people across the organisation together with PCS as the recognised trade union.
- Finalisation of the development of the strategic risk register and team registers, ensuring these are reviewed regularly through the existing approved governance processes and that accepted internal audit recommendations are monitored and delivered.
- Review of internal governance and decision making and implementation of changes, taking account of recommendations made in previous internal audit reviews.
- Examination of opportunities retention of funds from asset recovery to enhance the resources available to expand the impact of prevent and pursue activities.

4. Ensuring and monitoring outcomes

- 4.1 The GLAA collects data that supports a number of key performance indicators which are categorised into Prevent, Protect and Pursue, covering areas of victims, intelligence, communications, investigations, licensing, compliance, learning and development, efficiency, human resources and finance.
- 4.2 We have now completed the revision of the GLAA's performance framework; the new performance pack is now operational and enhances our ability regularly to report on our successes. During 2019-20 we will evaluate the effectiveness of performance and of the framework. It will also be informed by other regular information requests from our partners and sponsors.
- 4.3 The purpose of introducing a new approach to performance is to ensure robust oversight by the GLAA Board, Home Office sponsors and other key stakeholders, whilst also improving the overall performance and value for money of the GLAA. Our effectiveness will be reported in the Annual Report and Accounts.
- 4.4 The GLAA's operational activity is also scrutinised by the Independent Office for Police Conduct (IOPC), the Investigatory Powers Commissioner's Office (IPCO), and has been subject to voluntary inspection by Her Majesty's Inspectorate of Constabulary and Fire and Rescue (HMICFRS) in the use of its new criminal

powers. The GLAA has received positive reports on how it is operating and will continue to act on any recommendations to further improve operational practice.

4.5 The GLAA has set itself a series of key performance questions in order to determine the impact of its work and how effectively it is delivering wider outcomes.

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?
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?

4.6 During 2019-20 the GLAA will use its performance measures, evaluation and other sources to develop answers to these questions, testing those with partners and using emerging views to inform its practice and priorities. In particular, this will draw on GLAA intelligence reports developed over the last two years that will inform the answers to these questions and provide a benchmark for future comparative analysis.

Key deliverables
<ul style="list-style-type: none"> Implementation of the action plan agreed in response to recommendations from Her Majesty's Inspectorate of Constabulary and Fire and Rescue (HMICFRS) together with any other improvements agreed following inspection and oversight from external bodies. Regular performance reporting to the GLAA Board, Home Office and key partners. A set of draft answers to the five key performance questions, shaped by discussions with key stakeholders, to test whether we are measuring the right things. Evaluation of the performance and insight regime and options set out for further improvement.

5. Measures and targets for 2019-20

5.1 In addition to the key deliverables set out against each objective in the sections above, this table describes the performance measures that will be used to track progress against each objective during the year.

Business Plan Performance Measures

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20
1. Identify and support victims of labour exploitation	To work towards prioritising victims as part of our investigations	Potential victims assisted (directly/indirectly)	Victims identified = 2,367 NRM submissions = 62 MS1 submissions = 60 (duty to notify)	To increase the effective identification by 10% To increase the overall number of NRM and MS1 referrals by 10%
		Numbers of Tier 1 resolution (Regulated Sector Only)	72 *	To increase by 20%
		The overall number of workers affected	110 *	To increase by 20%
		Withheld wages and holiday pay recovered	Withheld wages = £2,134 Holiday pay = £13,823	To increase by 25%
2. Maintain a credible licensing scheme, creating a level playing field and promoting compliant business growth	To address the time it is taking to process a licence application, ensuring this is kept to the standard	Days taken to complete licensing applications, broken into sections of process from the licence fee being cleared to the licensing decision being made	Average for 18/19 = 76 Working days	The overall target is by March 2021 to reduce the average of 50 days The Mid-point target is 68 days by March 2020

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20
	To review the time taken to complete a compliance investigation, allowing us to target persistent non-compliance in the regulated sector	Days taken to complete compliance investigations, broken into sections, from date raised to report submitted to licensing for a decision	Average 18/19 = 185 days	The overall target is to reduce to 90% in 90 days by March 2021 The mid-point target is to reduce to 90% in 166 days by March 2020
	To review time taken to make licensing decisions	Days taken to make licensing decision once all information is available	Revocation = 15 days ALC = 10 days Straightforward grant of licence = 5 days	To improve by 10% to 14 days, 9 days and 4 days respectively
3. Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation	To enhance engagement with key stakeholders within sectors deemed at high risk of labour exploitation, based on the nature and scale of those risks as assessed by GLAA intelligence	Number of protocols resulting from direct GLAA engagement	3	5 (this is to add two new protocols in the coming year)
		Number of businesses signed up to protocols	Construction = 76 Apparel = 16 Retail = 3	Construction = 100 Apparel = 40 Retail = 6 To increase the number of signatories on each linked to measure below
		Increase in the volume of intelligence submissions from those sectors	Construction = 71 ** Apparel = 10 ** Retail = 7	An increase of 25% in the percentage of actionable intelligence

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20
	To increase awareness of modern slavery and labour exploitation through external training, engagement with stakeholders and amplifying messaging using social and traditional media	GLAA's level of activity across digital engagement channels and the accumulated reach	2,765 pieces of activity Average monthly impressions (no. of times content is displayed) 287,000	To increase the reach of social media by 5%
4. Disrupt and deter criminal activity within the labour market	To work to increase the number of GLAA led enforcement investigations, whilst maintaining our work in partnership	Investigations undertaken by GLAA lead Investigations Undertaken in Partnership	No Undertaken = 179 No Undertaken = 81	To maintain baseline To maintain baseline at approximately 40% of cases
	To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations	GLAA-led convictions Sanctions	Convictions = 6 LMEU = 16 LMEO = 1 Warnings = 31 Enforcement notices = 39 Cases referred to CPS = 16	Convictions LMEU LMEO Warnings Enforcement notices Cases referred to CPS To increase the above by 10% CPS - New Measure: 80% of CPS cases referred which result in meeting evidential threshold New Measure: 70% of those cases which meet evidential threshold result in positive charging decision

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20
	To make use of financial investigation powers in investigations	Number of investigations featuring proceeds of crime investigations (POCA)	No = 1 Value = £41,300	To improve on the baseline
5. Develop our people and culture in line with the GLAA's PROUD values, ensuring a diverse, resilient and change-ready organisation	To improve retention levels, increase diversity and increase satisfaction of GLAA employees	Performance effectively managed and meeting with line manager	81% agree/strongly agree	To improve on 2018 baseline
		Proud to work for the GLAA	Baseline 94%	To maintain 2018 baseline
		Treated with fairness and respect	Baseline 84%	To Improve on 2018 baseline
		Average sickness rates	3.42% (public sector 2.9%)	To maintain or improve on 2018 and move under the public sector average
		Average people turnover	11.2% (public sector 13.3%: Jan to Dec 2018)	To maintain or improve on 2018 and remain under the public sector average
		To move closer to the national public sector workforce figures based on gender and ethnicity	Gender female 38% Public sector average 46% Ethnicity (BAME) 5.8% public sector Average 9.9%	To improve on 2018 baseline and get closer to public sector averages
Number of personnel that have a personal development discussion with manager	Wasn't measured in 2018-19	New Measure: 95% of personnel to have discussion		

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20
6. Provide efficient and effective services, sound governance, robust risk management and value for money	To deliver a balanced budget, deliver on savings targets	Performance against budget	Add percentage variance as at end of March 2019 Savings target 300K	To improve on baselines Current projected overspend is £300k to monitor savings plan to bring underspend to zero
	To improve on Internal Audit view of GLAA	End of year overall audit opinion	Anticipated to be limited	Moderate
		Responses to audit recommendations within agreed timeframes	Percentage of high and medium actions completed by due date	80% of actions completed by due date
		Internal audit opinion on risk management	Limited	To move audit risk opinion to Moderate

*Operational constraints meant that Tier 1 resolutions were only carried out for part of the year we have extrapolated them out for a full year.

**The construction and garment protocols were signed during the course of 2018 following which there was enhanced intelligence from those sectors