



Gangmasters &
Labour Abuse Authority

GLAA Q1 Performance Report

Reporting period: Q1 April-June 2019

Rolling YTD April – June 2019

Previous year April 2018 - March 2019

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Gangmasters & Labour Abuse Authority

Business Plan Objectives

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	Q1 2019-20 YTD (% comparison to quarterly average)
1. Identify and support victims of labour exploitation	To work towards prioritising victims as part of our investigations	Potential victims assisted (directly/indirectly)	<p>Victims identified = 1,658</p> <p>NRM submissions = 33 (plus 13 assists)</p> <p>MS1 submissions (duty to notify) = 34 (plus 19 assists)</p>	<p>To increase the effective identification by 10%</p> <p>To increase the overall number of NRM and MS1 referrals by 10%</p>	<p>Victims identified = 339</p> <p>NRM submissions = 3 (plus 1 assist)</p> <p>MS1 submissions = 11</p>
		Numbers of Tier 1 resolution (Regulated Sector Only)	72 (i)	To increase by 20%	Tier 1 resolutions = 10
		The overall number of workers affected	53 (i)	To increase by 20%	

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	Q1 2019-20 YTD (% comparison to quarterly average)
					Number of workers = 490
		Withheld wages and Holiday pay recovered	<p>Withheld wages = £2,134</p> <p>Holiday pay = £13,823</p> <p>A further £3,286.23 – does not differentiate between.</p>	To increase by 25%	<p>Withheld wages = £1,131</p> <p>Holiday pay = £773.73</p> <p>Numerous 'other' e.g PPE, non-monetary, and non-GLAA sector recoveries made which exceed the 2018-19 quarterly average.</p>

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	Q1 2019-20 YTD (% comparison to quarterly average)
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	Average of 2019-20 (19-20 tasked cases only)
	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	No Compliance Inspection cases tasked in 2019-20 have been finalised this quarter, and as such analysis has not been possible.
	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	Revocation = Not yet possible as no cases of this nature which were tasked Q1 2019-20 have finalised this quarter. Revocation & ALC = Not yet possible as no cases of this nature which were tasked Q1 2019-20 have finalised this quarter.

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	Q1 2019-20 YTD (% comparison to quarterly average)
					Straightforward grant of Licence = 3 days Refusal = 5 days
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	Numbers of protocols resulting from direct GLAA engagement	3	5 This is to add two new protocols in the coming year	Number of protocols = 3
		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	Construction = 128 members Apparel = 18 members (May 2019) Retail = tbc
		Increase in the volume of intelligence submissions from those sectors	Construction = 71 Apparel = 10 Retail = 7 (ii)	An increase of 25% in the percentage of actionable intelligence	Construction = 13* Apparel = 4* Retail = 1* *Please see level of General Issues/Referrals for another measure

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	Q1 2019-20 YTD (% comparison to quarterly average)
					indicating increases across all 3 sectors.
	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%	Average monthly impressions = 372,506
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	Enforcement & NSO investigations = 50 % of investigations in partnership = 51%
	To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations	GLAA-led convictions Sanctions	Convictions = 6 LMEU = 15 LMEO = 2 Warnings = 31	To increase all by 10%	Convictions = 2 LMEU = 3 LMEO = 0 Warnings = 2

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	Q1 2019-20 YTD (% comparison to quarterly average)
			Enforcement Notices = 17		Enforcement Notices = 8
			Cases Referred to CPS =16	<p>New Measure - 80% of cases referred which result in meeting evidential threshold-</p> <p>New Measure- 70% of those case which meet evidential threshold result in positive charging decision-</p>	<p>Cases referred to and currently with CPS Q1 2019-20 = 1</p> <p>Total cases currently with CPS = 8</p>
	To make use of financial investigation powers in investigations	Number of investigations featuring proceeds of crime investigations (POCA)	<p>No = 1</p> <p>Value = £41,300</p>	To improve on the baseline	Number = 0
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	<p>Performance effectively managed and meeting with line manager.</p> <p>Proud to work for the GLAA</p> <p>Treated with fairness and respect</p>	<p>81% agree /strongly agree.</p> <p>Baseline 94%</p> <p>Baseline 84%</p>	<p>To improve on 2018 baseline</p> <p>To maintain 2018 baseline</p> <p>To Improve on 2018 Baseline</p>	Awaiting results

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	Q1 2019-20 YTD (% comparison to quarterly average)
		Average sickness rates	3.42% (public sector 2.9%)	To maintain or improve on 2018 and move under the public sector average	New CIPD/ONS measure from April 2019 is 3.54%. Q1 2019-20 % working days lost = 4.62%
		Average people turnover	11.2% (public sector 13.3% (2018))	To maintain or improve on 2018 and remain under the public sector average	2019-20 Q1 YTD = 3.3%
		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	Gender female 39% Public sector average 46% Ethnicity (BAME) 5.5% (47.5% of employees prefer not to say) public sector average 9.9%
		Number of personnel that have a personal development discussion with manager	Wasn't measured in 2018	New Measure 95% of personnel to have discussion	Awaiting results
6. Provide efficient and effective services, sound governance, robust	To deliver a balanced budget, deliver on savings targets	Performance against budget	Add percentage variance as at end of March 2019	To improve on baselines	Awaiting analysis

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	Q1 2019-20 YTD (% comparison to quarterly average)
risk management and value for money	To improve on Internal Audit view of GLAA		Savings target 300K	Current projected overspend is £300k to monitor savings plan to bring underspend to zero	
		End of year overall audit opinion	Anticipated to be limited	Moderate	Awaiting results
		Responses to audit recommendations within agreed timeframes	Percentage of high and medium actions completed by due date	80% of actions completed by due date	Awaiting results
		Internal audit opinion on risk management	Limited	To move audit risk opinion to Moderate	Awaiting results

(i) 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



Glossary of Terms

Gangmasters & Labour Abuse Authority

GLAA	Gangmasters and Labour Abuse Authority
AI	Application Inspection
ALC	Additional Licensing Conditions
CARD	Crimson Allocation Record Sheet
CI	Compliance Inspection
CNB	Compliance- New Business Inspection
CPA	Change of PA Inspection
Crimson	Case Management System
ENF	Enforcement Tasking
ENRS	Enforcement Tasking – Non-Regulated Sector
ERS	Enforcement Tasking – Regulated Sector
General Issue	Record of referrals to the GLAA
MS1	Duty to Notify the Home Office when a potential victim of modern slavery is identified & does not consent to the NRM
MSHT	Modern Slavery/Human Trafficking
NFA	No Further Action
NRM	National Referral Mechanism
NSO	Non-Standard Operation
NTT	Non-Triaged Tasking
OCDA	Office for Communications Data Authorisations
OCG	Organised Crime Group
POCA	Proceeds of Crime Act
RIPA	Regulation of Investigatory Powers Act 2000
SIO	Senior Investigating Officer
SPoC	Single Point of Contact
Syndicate 1	North-East
Syndicate 2	South-East
Syndicate 3	South-West
Syndicate 4	North-West
Tier 1	Monetary or Non-Monetary Resolution for Worker
YTD	Year to Date

PREVENTION

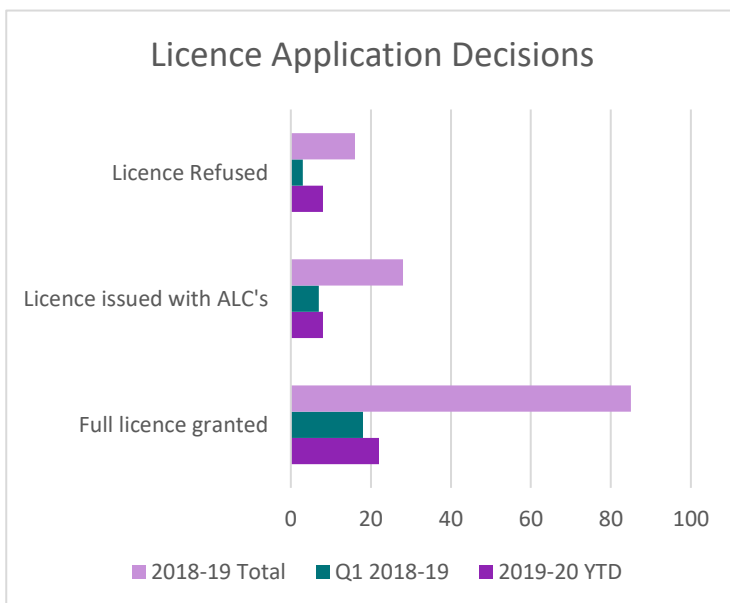
Strategic Priority: Preventing Worker Exploitation

- *Maintain a credible licensing scheme;*
- *Creating a level playing field and promoting growth;*
- *Engage with stakeholders to minimise and manage risk;*
- *Manage risk and support compliant business*

Licensing

Currently there are 1033 GLAA licence holders supplying workers to the GLAA regulated sectors. This is an increase on the 2018-19 end of year total of 1017 in April 2019. There continues to be a consistent stream of licence applications; on average 14 a month, and 58% of application decisions this quarter result in a full licence being granted.

Licence applications initiated		
April 2018- March 2019	April – June 2019-2020 YTD	% change from April 2018 - March 2019
176	41	7% ↓
Average 15 per month	Average 14 per month	



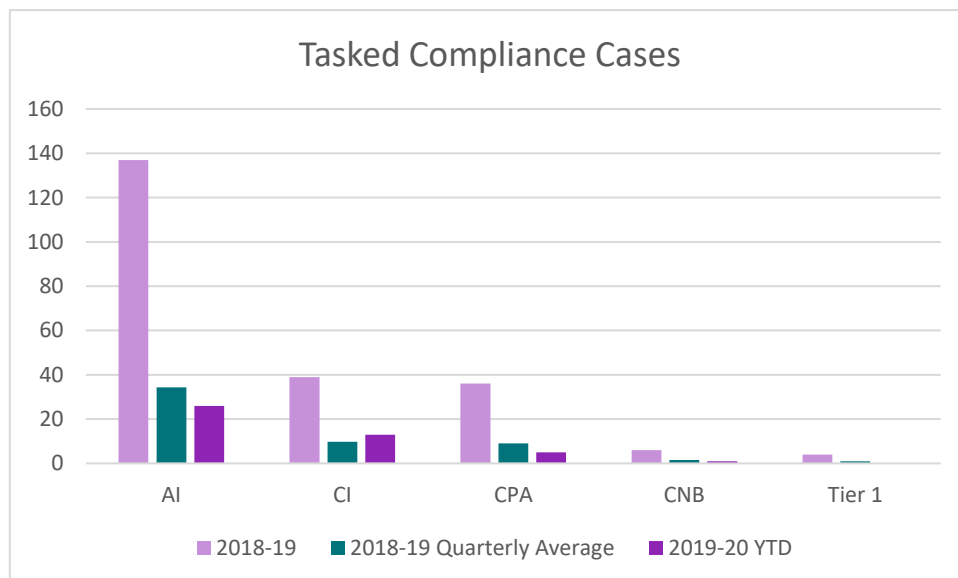
8 licences were revoked **without immediate effect** during Q1 2019/20, an increase of 52% from the previous year, when looking at the quarterly average. During May 2019 one licence was revoked **with immediate effect (no licences were revoked with immediate effect during 2018/19)**.

Compliance

Compliance Cases tasked		
April 2018 – March 19 End of Year Total	April - June 2019	% change from April 2018 -March 2019 quarterly average.
222	45	19% ↓

The number of tasked AIs, CPAs and CNBs 2019-20 YTD have decreased in comparison to the quarterly average for 2018-19.

The volume of tasked Compliance Inspections has increased this quarter, with an average of 10 being tasked on average each quarter in 2018-19, to 13 cases in 2019-20 YTD.



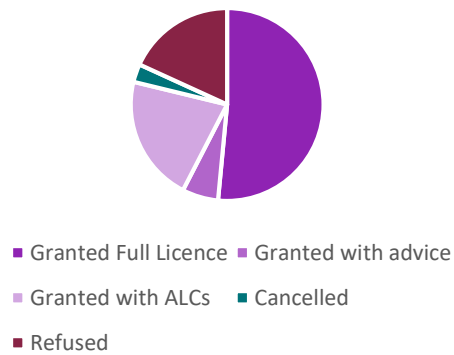
Open compliance cases

There are currently 81 live compliance cases, 48% of which are CIs and 41% are AIs.

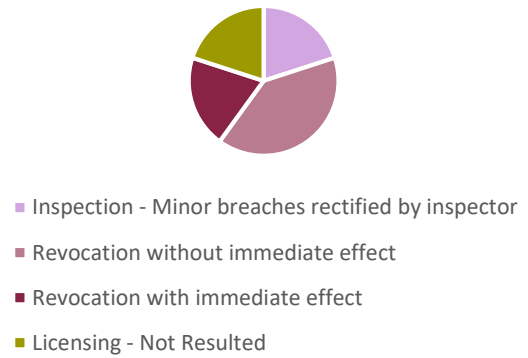
Closed cases by type

43 compliance cases were closed this reporting period. The outcomes suggest general compliance by labour providers, with the majority of investigations resulting in the granting of a licence or authorisation of the proposed PA.

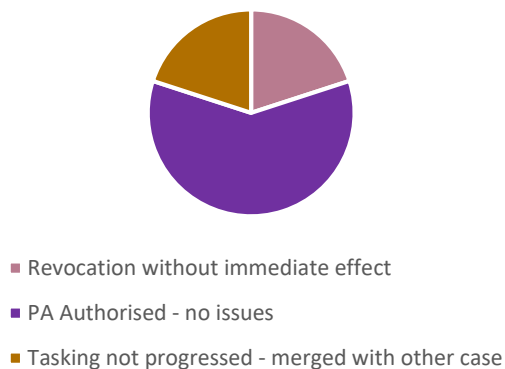
AI Closures 2019-20 YTD = 33



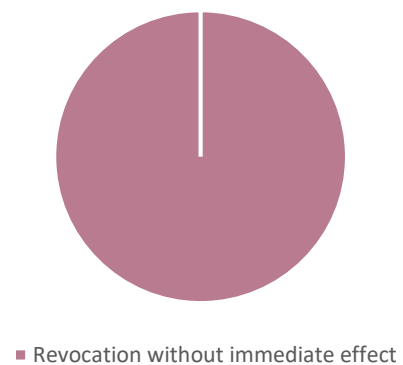
CI Closures 2019-20 YTD = 5



CPA Closures 2019-20 YTD = 5



CNB Closures 2019-20 YTD = 1



Breaches identified

	Apr-19	May-19	Jun-19	Total YTD
Breaches identified by inspector	20	32	20	72

	Apr - 19	May - 19	Jun - 19	2019-20 YTD
Licensing breach with Inspection	2	21	6	29
Licensing breach without inspection	0	1	5	6
Total				35

Business Change

The GLAA have undertaken many engagements with stakeholders from various sectors this quarter, raising awareness of modern slavery and labour exploitation.

Such engagements have reached in excess of 1,400 people during the first quarter of 2019/20

	No of Engagements (Business Change)	No of Engagements (Syndicate staff)	Reach (approx.)
April - 19	9	12	513 (excluding potentially thousands of radio listeners)
May - 19	7	5	528 (excluding potentially 6.79million radio listeners)
June - 19	9	3	428
TOTAL	25	20	1,469

PROTECT


Strategic Priority: Protecting Vulnerable People

- Identify & support victims of labour exploitation;
- Work in partnership to protect workers' rights;
- Prevent labour exploitation

General Issues

The number of referrals made to the GLAA regarding potential labour exploitation and modern-day slavery offences continues to increase.

There was a 12.5% increase in the number of General Issues created between April and June 2019 when compared to the quarterly average of the previous year.

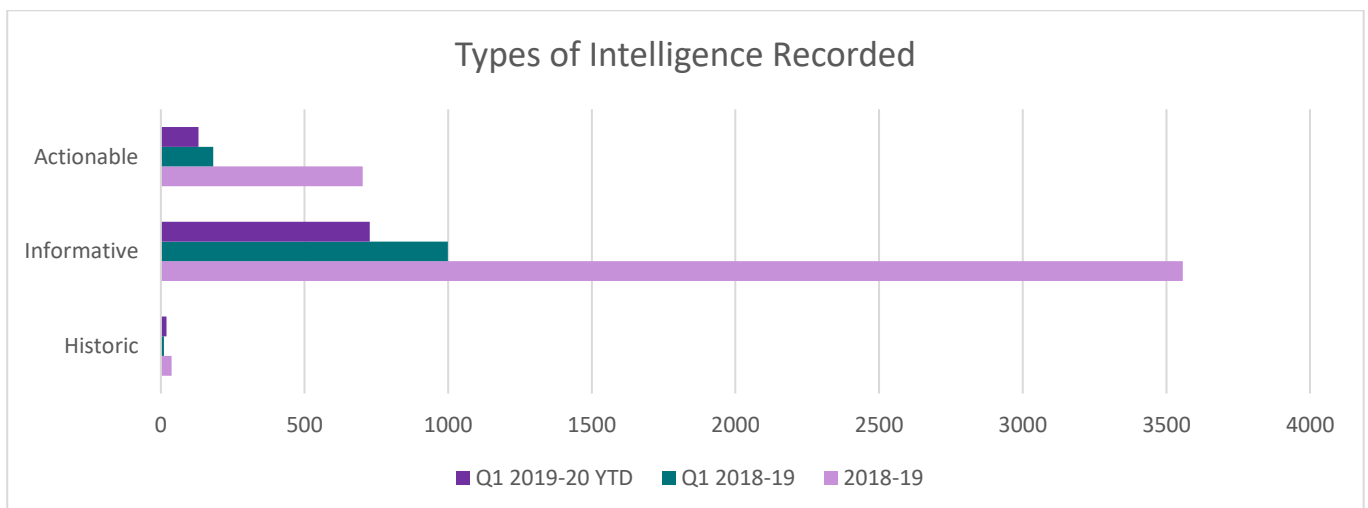
	2018-19 Total	Rolling Total YTD April- June 2019	% change from 2018-19 Quarterly Average
Created	2740 (quarterly average 685)	783	12.5% 

Intelligence

The GLAA is an intelligence-led organisation that receives intelligence in a variety of different formats from partner agencies, industry and members of the public

The number of reports recorded in Q1 of 2019-20 is below the quarterly average for 2018-19, with a reduction of 18% (197)

	Q1 2018-19		2018-19		Rolling YTD April- June 2019	
Intelligence Reports created	1,192		4,296		877	
GLAA Sector?	Yes	No	Yes	No	Yes	No
	361	831	1,334	2,962	235	642
Modern Slavery Indicators	Yes	No	Yes	No	Yes	No
	90	1102	308	3988	41	836



This reporting period, where the sector is known and recorded, actionable intelligence tends to relate to the construction, car wash and hotel/restaurant sectors.

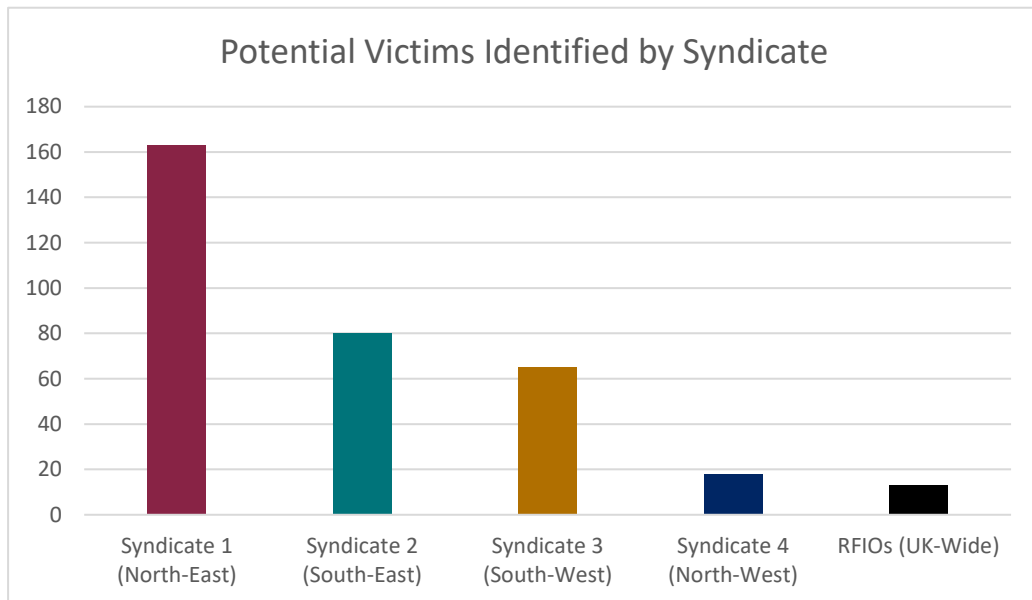
Identification and support of victims

	2018-19 Total	Q1 2019- 20 YTD total	% change from 2018-19 Quarterly Average
Potential victims of labour exploitation identified	1,658 (414 Quarterly Average)	339	18% ↓
Number of NRM Referrals made by the GLAA	33 ¹ (plus 13 assists)	3 (plus 1 assist)	64% ↓
Number of MS1 forms submitted by the GLAA	34 (plus 19 assists)	11	17% ↓

339 potential victims were identified by the GLAA in the first quarter of 2019-20, a decrease when compared to the quarterly average for 2018/19. There has also been a decrease in the number of NRM referrals however the number of MS1 referrals made has increased.

There continues to be some disparity between the number of potential victims identified and the amount of NRM and MS1 referrals, however it is important to note that exploitation can take many forms and may not always indicate modern slavery. Furthermore, potential victims have to consent to enter the NRM.

¹ National Referral Mechanism Statistics – End of Year Summary 2018 - <https://www.antislaverycommissioner.co.uk/media/1273/2018-nrm-end-of-year-summary.pdf>



The majority of potential victims encountered during this reporting period were working in the car wash and food processing/packaging sectors, although a number in both sectors do relate to the same investigations.

All NRM referrals submitted this reporting period were in the South-East Syndicate, and MS1 referrals in the North-East and RFIO syndicates only. RFIO's accounted for 8 of the 11 total referrals.

Tier 1 intervention

Tier 1 Resolutions	
2018-19 Total	2019-20 Q1 YTD
72 resolutions	10 resolutions
53 workers affected	490 workers affected
Withheld wages = £2,134 Holiday pay = £13,823	Withheld wages = £1,131 Holiday pay = £773.73
A further £3286.23 – does not differentiate between.	A further £7,313.82 relates to other recoveries, such as refunded PPE payments, with GLAA Licensing making a large recovery this quarter.

There was also a resolution of £2,721.75 in relation to national minimum wage arrears for 2 car wash workers as part of a HMRC National Minimum Wage enforcement-led investigation in the East Midlands, which the GLAA supported.

PURSUE

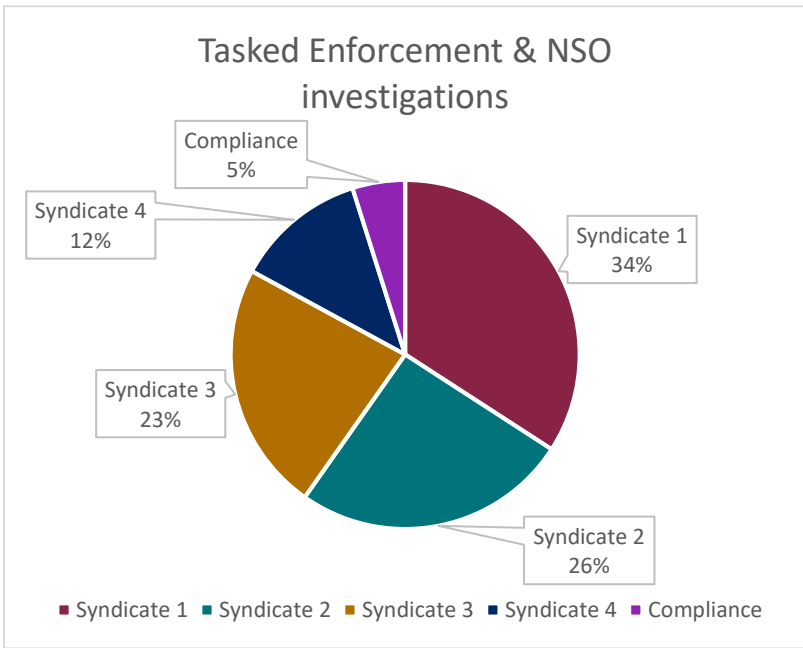
Strategic Priority: Pursuing those who exploit others for their work either financially, physically and or through coercion and control

- *Disrupt criminal activity within the labour market*

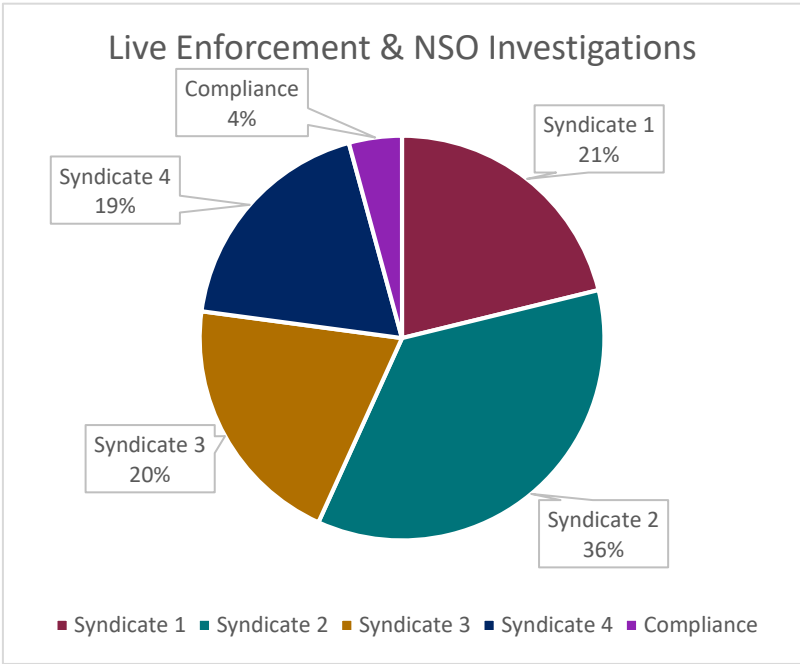
Enforcement

	Q1 2019-20 YTD	2018-19 Quarterly Average	% change from 2018-19 Quarterly Average
Enforcement cases tasked	59	62	4.8% ↓
Non-standard operations (NSO)	23	10	56.5 % ↑

During the first quarter of 2019/20 59 cases were tasked, of these 51% (30) had indicators of modern slavery/human trafficking.



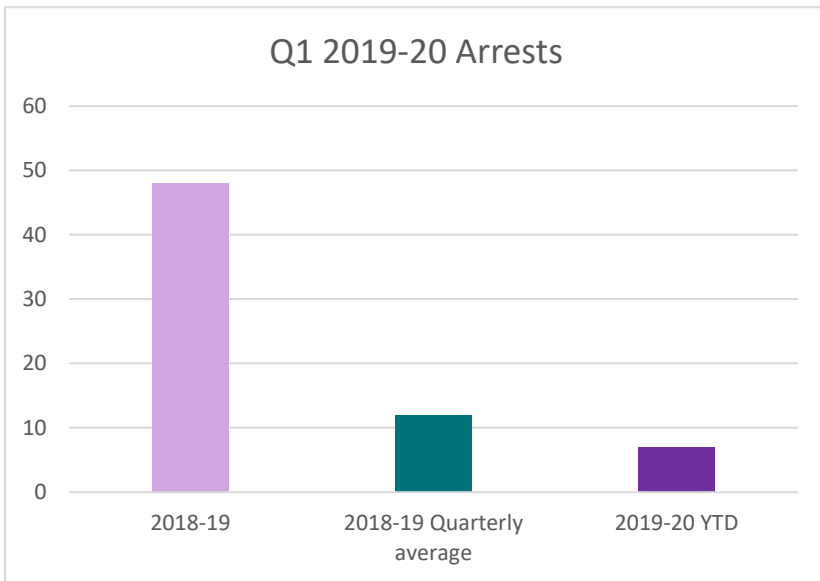
The majority of enforcement and NSO cases in the first quarter of 2019-20 were in Syndicate 1 (North-East), followed by Syndicate 2 (South-East).



There are currently 118 live enforcement and NSO cases, which are evenly split across Syndicates 1 (North-East), 3 (South-West) and 4 (North-West), with a notable increase in the amount of live cases in Syndicate 2

30% (25) of enforcement cases and NSOs concern sectors that are regulated by the GLAA in terms of licensing. 51% (40) of all enforcement and NSO cases tasked this quarter involve some level of joint working.

Arrests and Warrants



7 arrests have been made across all four operational syndicates this reporting period.

	April-June 2019				
	Syndicate 1	Syndicate 2	Syndicate 3	Syndicate 4	Total
GLAA Offences charged	0	0	0	2	2
Warnings	0	0	1	1	2
Enforcement notice	4	0	3	1	8
LMEU	0	0	3	0	3
LMEO	0	0	0	0	0