



Gangmasters &  
Labour Abuse Authority

# GLAA Performance Report

**Reporting period: Q3 October- December 2018**

*Rolling YTD April- December 2018*

*Previous Year- April- December 2017*

## Business Plan Objectives

| Aim                                                                                                               | Measure                                                                                    |                                                                                         | Rolling YTD April to December 2018                                                                                               |
|-------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| To work to increase the number of GLAA-led enforcement investigations, whilst maintaining our work in partnership | Active and closed GLAA led enforcement investigations                                      | Active                                                                                  | Currently 113 active enforcement operations.                                                                                     |
|                                                                                                                   |                                                                                            | Closed                                                                                  | 82                                                                                                                               |
| To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations         | Sanctionable outcomes by type                                                              | Convictions                                                                             | 2                                                                                                                                |
|                                                                                                                   |                                                                                            | Warnings                                                                                | 21                                                                                                                               |
|                                                                                                                   |                                                                                            | LMEO                                                                                    | 1                                                                                                                                |
|                                                                                                                   |                                                                                            | LMEU                                                                                    | 7                                                                                                                                |
|                                                                                                                   |                                                                                            | Enforcement notice                                                                      | 8                                                                                                                                |
| To make use of financial investigation powers in investigations                                                   | Number of times POCA used in operations                                                    |                                                                                         | 0                                                                                                                                |
| To expand the GLAA outreach to engage with a larger number and more diverse range of stakeholders                 | Number of protocols and % of organisations signed up to protocols                          | Construction protocol (78 signatories)                                                  |                                                                                                                                  |
|                                                                                                                   |                                                                                            | The Apparel & General Merchandise Public & Private Protocol (Textiles) (15 signatories) |                                                                                                                                  |
| To prioritise engagement with stakeholders                                                                        | Number of sectors which saw an increase in intel reports after GLAA engagement at an event |                                                                                         |                                                                                                                                  |
| To ensure all licensing queries are responded to within 5 working days.                                           | % of sample responded to in 5 working days                                                 |                                                                                         | 69.5% October (delays due to IT transition)<br>69.5% November (delays due to LAWS issues and transition backlog)<br>89% December |

| Aim                                                                                                                                      | Measure                                  | Rolling YTD April to December 2018                                                              |      |
|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------------------------------------------------------------------------------------------|------|
| To work to increase the number of enforcement investigations undertaken in partnership, whether GLAA or partner led                      | Number of active joint working cases     | 96                                                                                              |      |
| To address the time, it is taking to process a licence application, ensuring this is kept to the standard                                | % completed within 30 days               | Oct – 46 working days<br>Nov – 68 working days<br>Dec – 50 working days                         |      |
| To review the time taken to complete a compliance investigation, allowing us to target persistent non-compliance in the regulated sector | % completed within 30 days               | 0%                                                                                              |      |
| To work towards prioritising victims as part of our investigations                                                                       | Victims identified by type and referrals | Potential victims identified                                                                    | 1182 |
|                                                                                                                                          |                                          | NRM                                                                                             | 32   |
|                                                                                                                                          |                                          | MS1                                                                                             | 34   |
| To be compliant with the Victims Charter requirements                                                                                    |                                          | New objective - currently working out the measurement to capture this                           |      |
| To raise awareness of the signs of modern slavery by providing external training                                                         |                                          | 81 engagements with stakeholders/ industry reaching nearly 4,000 people both here and overseas. |      |

# PREVENT

## Strategic Priority: Preventing Worker Exploitation

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

### Licensing

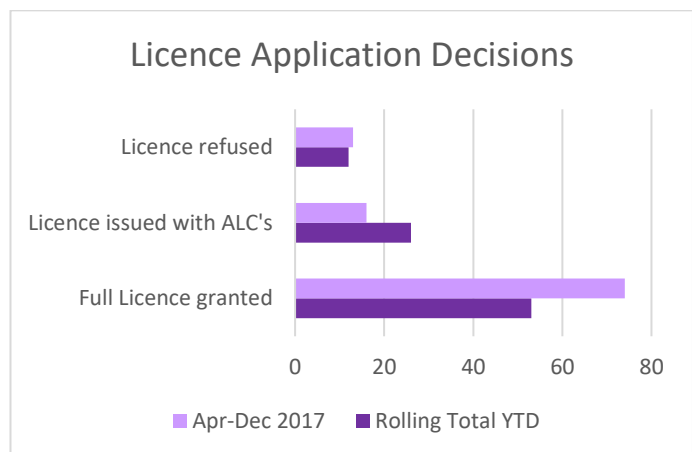
Currently there are 1005 GLAA licence holders supplying workers to the GLAA regulated sectors. There continues to be a consistent stream of licence applications; on average 13.7 a month, and most cases result in a full licence being granted.

| Licence applications initiated |                                       |                                     |
|--------------------------------|---------------------------------------|-------------------------------------|
| October- December 2018         | Rolling YTD Total April-December 2018 | % change from April - December 2017 |
| 50                             | 124                                   | 8%                                  |

Between April and December 2018 12 licences were refused; this figure remains consistent when compared to the previous year.

There has been a decrease in granting a full licence and an increase in those issued with additional licensing conditions (ALC)

No revocations have been made **with immediate effect** during this reporting period.



A total of 17 licences have been revoked **without immediate effect** between April and December 2018. This is an increase of 70% when compared to April-December 2017 during which there were 10 (During this reporting period 7 were revoked without immediate effect).

There are occasions when a revocation is made without an inspection taking place, mainly for breaches relating to pay and tax matters.

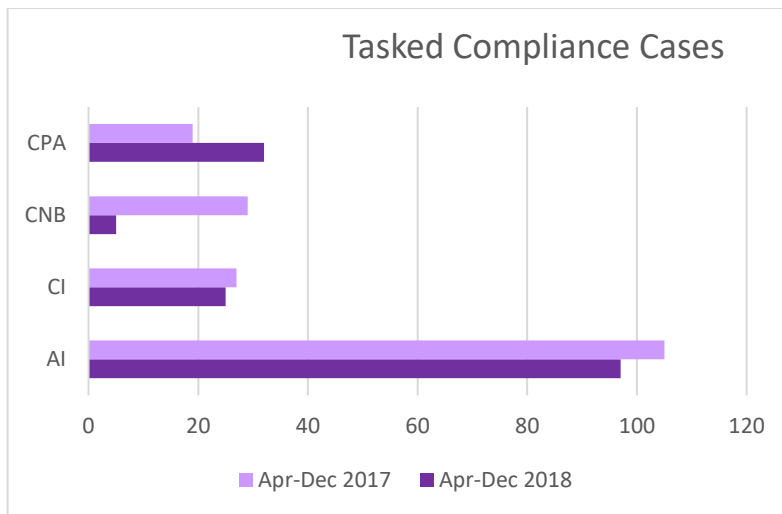
This demonstrates a proactive approach which allows the compliance arm to focus on more complex and serious allegations of exploitation

## Compliance

| Compliance Cases tasked |                                       |                                     |
|-------------------------|---------------------------------------|-------------------------------------|
| Oct-Dec 2018            | Rolling YTD Total April-December 2018 | % change from April - December 2017 |
| 50                      | 159 <sup>1</sup>                      | -11%                                |

There has been a decrease in the number of compliance cases tasked between April-December 2018 when compared to the previous year.

The number of tasked application (AI) and compliance inspections (CI) have remained rather consistent, with only a slight decrease in numbers. There has, however, been a decrease of 83% in new business inspections (CNB).

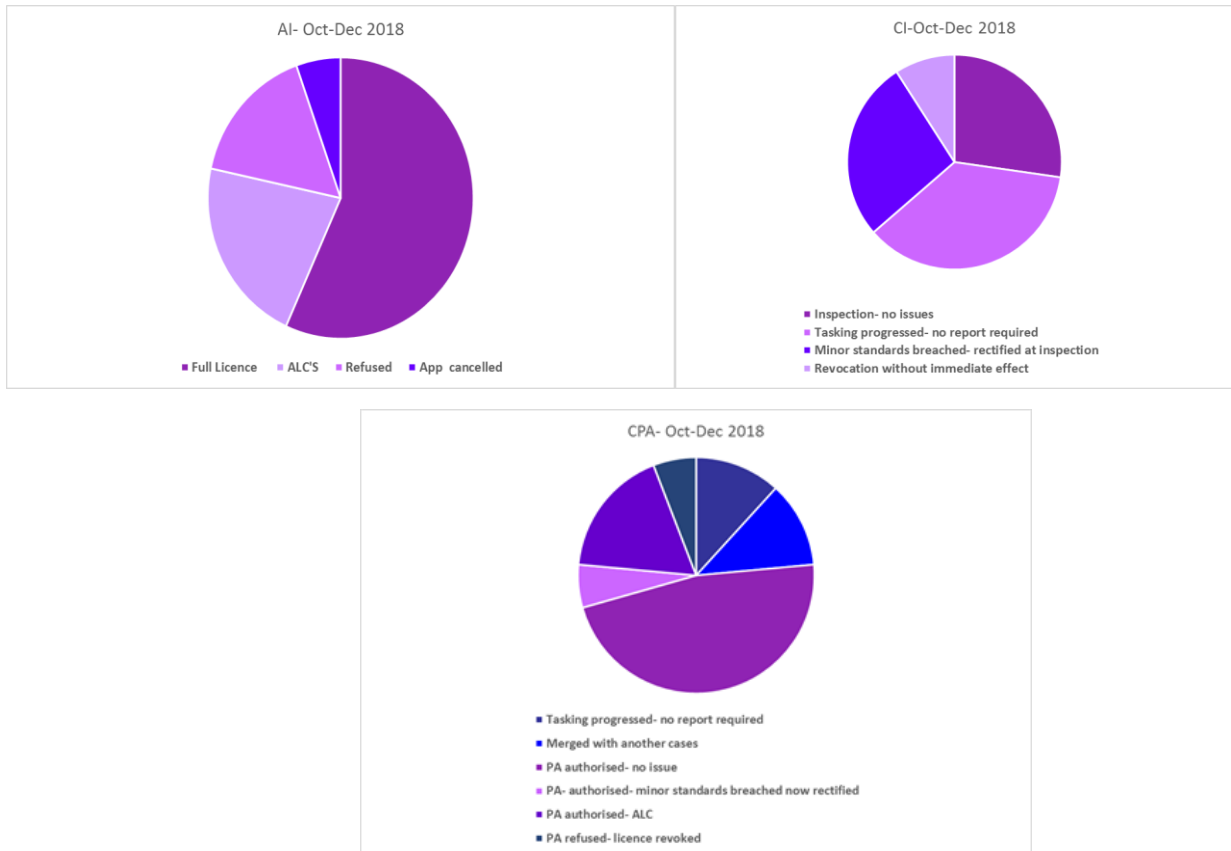


<sup>1</sup> Please note there is a difference of 1 when compared to Q1&2 reports (160 cases) as one compliance case has since been changed to an enforcement case- Ref 1741

## Closed cases by type

Several compliance cases have been finalised during the reporting period.

There were no CNB's closed over this period.



The outcome of cases closed over the reporting period suggests general compliance of labour providers.

Where possible, minor standard breaches have been rectified during the inspection and where this is not possible ALC's have been added to the licence. This allows businesses to progress in a compliant manner without additional sanctions in the first instance.

## Breaches identified

|                   | Apr-18 | May-18 | Jun-18 | Jul-18 | Aug-18 | Sep-18 | Oct-18 | Nov-18 | Dec-18 | Total      |
|-------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|------------|
| <b>Compliance</b> | 14     | 26     | 25     | 35     | 19     | 37     | 14     | 2      | 1      | <b>173</b> |

|                                     | Apr-18 | May-18 | Jun-18 | Jul-18 | Aug-18 | Sep-18 | Oct-18 | Nov-18 | Dec-18 | Total      |
|-------------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|------------|
| <b>Licensing with Inspection</b>    | 5      | 14     | 3      | 11     | 21     | 8      | 9      | 5      | 12     | 88         |
| <b>Licensing without inspection</b> | 1      | 0      | 2      | 8      | 1      | 0      | 0      | 0      | 6      | 18         |
| <b>Total</b>                        |        |        |        |        |        |        |        |        |        | <b>106</b> |

## Business Change

During the reporting period, the GLAA have undertaken numerous engagements with stakeholders, across various sectors, for example: development of joint training with the European Labour Inspectorate, partnership working with retailers and raising awareness on threats related to modern slavery at an event in Warsaw.

Work has also been undertaken to promote current protocols, and pilot licensing schemes within the car wash and nail bar sectors.

Furthermore, syndicate staff have also delivered presentations and training to various audiences including participation in police training events and presentations to retailers.

|               | No of Engagements (Business Change) | No of Engagements (Syndicate staff) | Reach (approx.) |
|---------------|-------------------------------------|-------------------------------------|-----------------|
| <b>Oct-18</b> | 10                                  | 19                                  | 1,519           |
| <b>Nov-18</b> | 25                                  | 16                                  | 2,299           |
| <b>Dec-18</b> | 4                                   | 7                                   | 112             |
| <b>TOTAL</b>  | <b>39</b>                           | <b>42</b>                           | <b>3,930</b>    |



# PROTECT

## Strategic Priority: Protecting Vulnerable People

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

## Intelligence

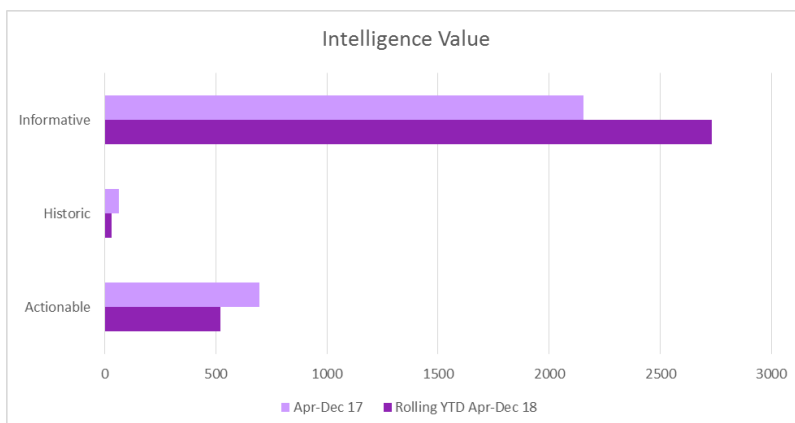
The GLAA is an intelligence-led organisation and continues to receive a consistent stream of intelligence regarding potential worker exploitation at all levels.

There has been a slight increase in the number of reports created this reporting period when compared to the same period last year.

|                                     | Oct-Dec 18  |             | Oct-Dec 17 |            | Rolling YTD April-December 2018 |             |
|-------------------------------------|-------------|-------------|------------|------------|---------------------------------|-------------|
| <b>Intelligence Reports created</b> | <b>1103</b> |             | <b>991</b> |            | <b>3281</b>                     |             |
| GLAA Sector?                        | Yes         | No          | Yes        | No         | Yes                             | No          |
|                                     | <b>354</b>  | <b>749</b>  | <b>275</b> | <b>716</b> | <b>999</b>                      | <b>2282</b> |
| Modern Slavery Indicators           | Yes         | No          | Yes        | No         | Yes                             | No          |
|                                     | <b>72</b>   | <b>1031</b> | <b>105</b> | <b>886</b> | <b>223</b>                      | <b>3058</b> |

Consistent with figures from the two quarters of the year the majority of Intelligence received this reporting period concerns sectors not regulated by the GLAA in terms of licensing, and in 93% of reports no modern slavery indicators are immediately identified.

84% of intelligence reports processed this reporting period were deemed informative, 14% actionable and 1% historic.

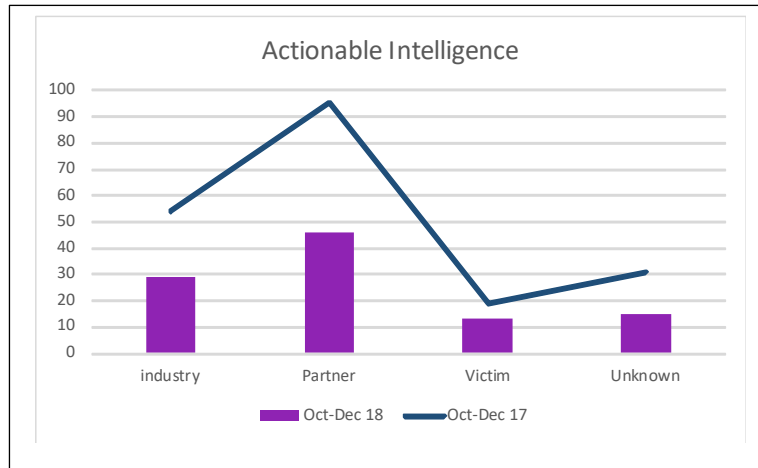


### Actionable Intelligence

The amount of intelligence received between April and December 2018 and deemed as actionable on receipt has decreased by approximately 25% when compared to the same period in 2017.

There has been a 26% increase in the amount of informative intelligence processed between April and December 2018.

Of the 14% of intelligence reports deemed as actionable 65% was received from an external source, with the majority coming from partner agencies. 13% of actionable intelligence is derived from potential victims of labour exploitation. It is important to note that the initial intelligence value may change once the intelligence is developed further and we do not currently have the resources to re-asses the value at a later date in all cases.



This reporting period, where the sector is known and recorded, actionable intelligence tends to relate to the food processing and car wash sectors; there has been a decrease in actionable intelligence regarding the agricultural sector.

## General Issues

There continues to be an increasing number of referrals made to the GLAA regarding potential labour exploitation and modern-day slavery offences.

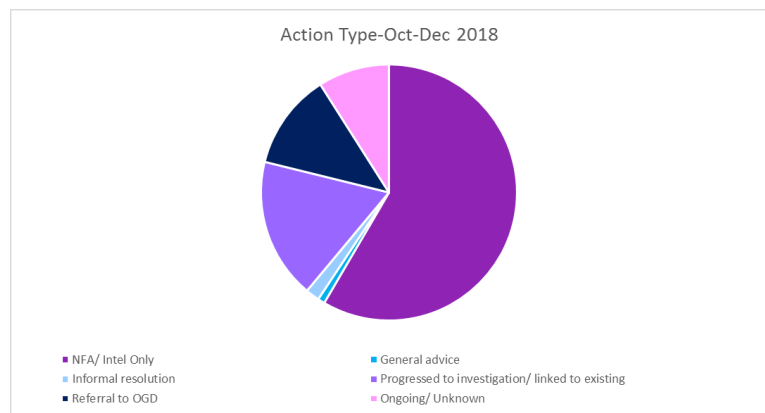
There was a 90% increase in the number of General Issues created between April and December 2018 when compared to the previous year.

|         | October-December 2018 | Rolling Total YTD April-December 2018 | % change from April-December 2017 |
|---------|-----------------------|---------------------------------------|-----------------------------------|
| Created | 799                   | 2133                                  | 90%                               |

58% of General Issues created this reporting period resulted in no further action/ intelligence only.

18% led to an investigation or were linked to an existing case.

The most common type of approach tends to be from an intelligence source, this is true for cases both closed with no further action and those progressed to an investigation.



## Identification and support of victims

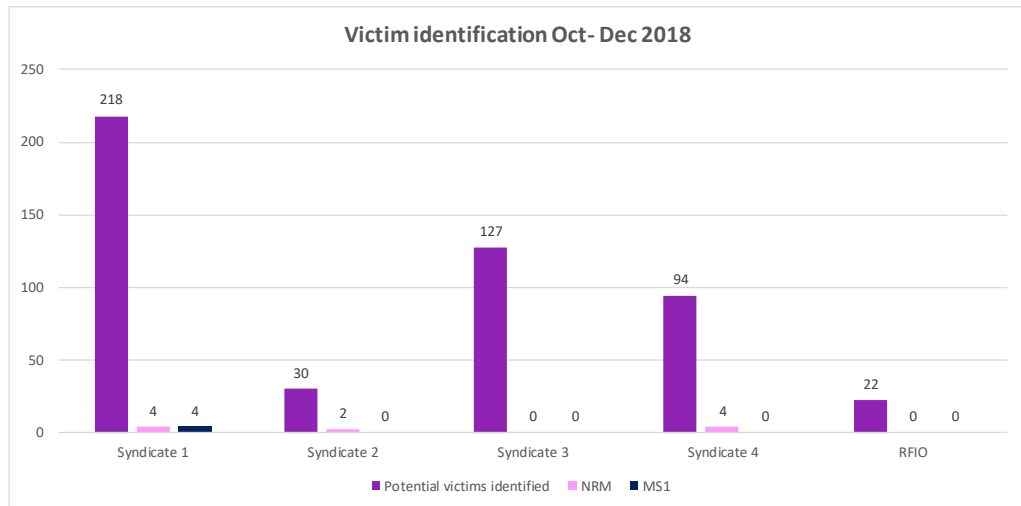
|                                                            | Oct-Dec 2018    | Rolling Total YTD April-December 2018 | % change from April - December 2017 |
|------------------------------------------------------------|-----------------|---------------------------------------|-------------------------------------|
| <b>Potential victims of labour exploitation identified</b> | 491             | 1182                                  | 876%                                |
| <b>Number of NRM Referrals made by the GLAA</b>            | 10 <sup>2</sup> | 32                                    | 94%                                 |
| <b>Number of MS1 forms submitted by the GLAA</b>           | 4               | 34                                    | -5%                                 |

There has been a notable increase in the number of potential victims identified by the GLAA between 2017 and 2018, a continuing result of increased resources, raised awareness and potentially increasing levels of labour exploitation.

There has been an increase in the number of NRM referrals made by the GLAA, but a slight decrease in the number of MS1 referrals made (please note that for 2017 data 75% of MS1 referrals are recorded between October and December and several pertain to the same investigation). There is some disparity between the number of potential victims identified and the number of referrals made (both NRM and MS1), however it is important to note that not all victims of labour exploitation encountered by the GLAA will be victims of modern slavery.

The majority of potential victims encountered during this reporting period were working in the car wash and agriculture sectors, although a number may relate to the same investigation.

<sup>2</sup> Official NCA statistic for the quarter have not yet been published so the number has been taken from MIS stats & there is sometimes a slight disparity between GLAA stats and those published by the NCA.



### Tier 1 intervention

Approximately 22 workers have been assisted by way of a Tier 1 intervention this reporting period (October- December 2018), and over £2,200 has been recovered on their behalf; non-monetary recoveries have also been made.

## 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

|                               | October-December 2018 | Rolling total YTD April-December 2018 | % change from April - December 2017 |
|-------------------------------|-----------------------|---------------------------------------|-------------------------------------|
| Enforcement cases tasked      | 52                    | 184                                   | 47%                                 |
| Non-standard operations (NSO) | 12                    | 40                                    | 54%                                 |

The number of tasked enforcement cases continues to increase. 52% of cases tasked this reporting period had indicators of modern slavery/ human trafficking. In 93% of intelligence reports no indicators of modern slavery/ human trafficking were initially found suggesting that these factors may not become apparent until there is further development and an investigation commences. Furthermore, not all intelligence received will lead to an investigation.



Enforcement cases tasked this reporting period cover a variety of sectors, with no overall majority.

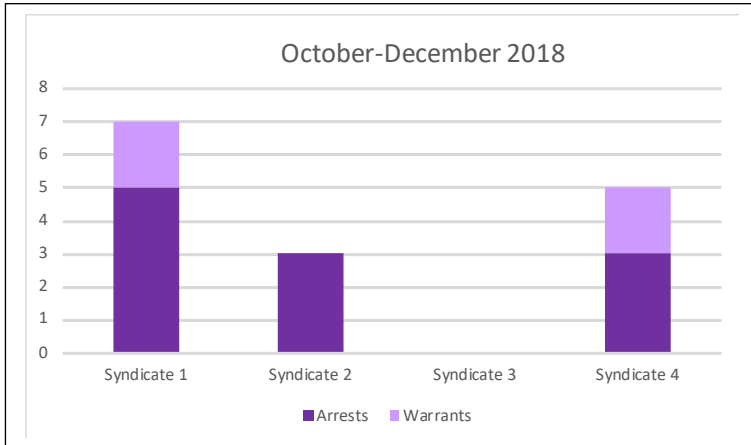
58% of tasked cases concern sectors that are regulated by the GLAA in terms of licensing.

35% of tasked cases had the opportunity for joint working.

The number of NSO's (where the GLAA assist the police in a day of action, for instance) has also increased. 67% tasked this reporting period were in the south-west area (Syndicate 3).

All but one involved joint working with a partner agency. Of those closed (10), half were referred to another agency (non-GLAA offence), and the remaining were closed/ no offences or for intelligence purposes only.

## Arrests and Warrants



There have been 11 arrests made this reporting period, just under half were made by Syndicate 1

The GLAA has obtained 7 warrants this reporting period

16 cases are currently with the CPS. There are no convictions recorded this reporting period.

|                    | October- December 2018 |             |             |             |            |       | Rolling Total YTD April-December 2018 |
|--------------------|------------------------|-------------|-------------|-------------|------------|-------|---------------------------------------|
|                    | Syndicate 1            | Syndicate 2 | Syndicate 3 | Syndicate 4 | Compliance | Total |                                       |
| Offences charged   | 0                      | 0           | 0           | 0           | 0          | 0     | 1                                     |
| Warnings           | 5                      | 0           | 0           | 1           | 0          | 6     | 21                                    |
| Enforcement notice | 1                      | 0           | 3           | 0           | 0          | 4     | 8                                     |
| LMEU               | 0                      | 0           | 3           | 0           | 0          | 3     | 7                                     |
| LMEO               | 1                      | 0           | 0           | 0           | 0          | 1     | 1                                     |

## Glossary of Terms

|               |                                                                                                                      |
|---------------|----------------------------------------------------------------------------------------------------------------------|
| 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                                                                                               |
| 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                                                                                     |
| NRM           | National Referral Mechanism                                                                                          |
| NSO           | Non-standard operation                                                                                               |
| OCDA          | Office for Communications Data Authorisations                                                                        |
| OCG           | Organised Crime Group                                                                                                |
| POCA          | Proceeds of Crime Act                                                                                                |
| RIPA          | Regulation of Investigatory Powers Act 2000                                                                          |
| SPoC          | Single Point of Contact                                                                                              |
| Syndicate 1   | North-east                                                                                                           |
| Syndicate 2   | South-east                                                                                                           |
| Syndicate 3   | South-west                                                                                                           |
| Syndicate 4   | North-west                                                                                                           |
| YTD           | Year to Date                                                                                                         |