



Gangmasters &
Labour Abuse Authority

GLAA Q3 Performance Report

Reporting period: Q3 October - December 2019

YTD April 2019 – December 2019

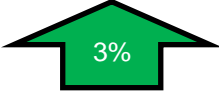

Previous year April 2018 - March 2019

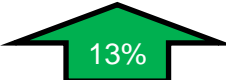
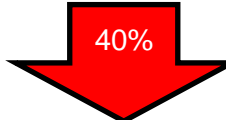
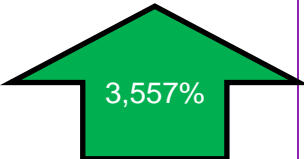
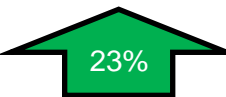
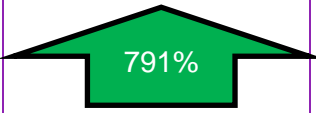
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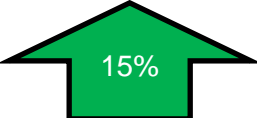
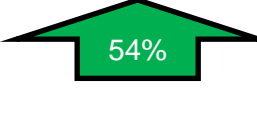
Table of contents


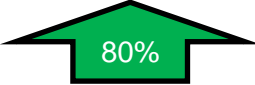
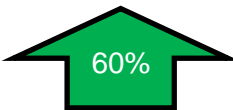

Business Plan Objectives	3
Prevention	12
Licensing.....	12
Compliance.....	13
Communications.....	15
Business Change.....	16
FOIs.....	17
Protect	17
Intelligence.....	17
General Issues (referrals).....	18
Identification and Support of Victims	19
Tier 1 Intervention.....	20
Pursue	21
Enforcement, Investigations.....	21
Arrests and Warrants.....	25
Glossary	25


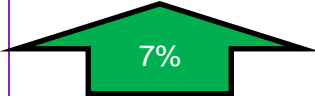

Business Plan Objectives

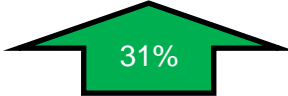
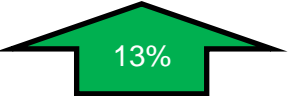

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (forecast % change)
1. Identify and support victims of labour exploitation	To work towards prioritising victims as part of our investigations	Potential victims assisted (directly/indirectly)	<p>Potential victims identified as part of enforcement activity - 1,658</p> <p>Potential victims of licensing standard breaches identified – 5,738</p> <p>Potential victims providing intelligence to the GLAA – 154</p> <p>Total = 7,550</p>	To increase the effective identification by 10%	<p>Potential victims identified as part of enforcement activity – 1,518</p> <p>Potential victims of licensing standard breaches identified – 4,232</p> <p>Potential victims reporting intelligence to the GLAA – 66</p> <p>Total = 5,816</p> <p> 3%</p>
			<p>NRM submissions = 33 (plus 13 assists)</p>	To increase the overall number of NRM and MS1 referrals by 10%	<p>NRM submissions = 7 (plus 18 assists)</p> <p> 28%</p>

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (forecast % change)
			MS1 submissions (duty to notify) = 34 (plus 19 assists)		MS1 submissions = 45 (plus 15 assists) 
		Numbers of Tier 1 resolution	72 (i)	To increase by 20%	Tier 1 resolutions = 32 
		The overall number of workers affected	53 (i)	To increase by 20%	Number of workers = 1,938 
		Withheld wages and Holiday pay recovered	Withheld wages = £2,134 Holiday pay = £13,823	To increase by 25%	Withheld wages = £1,963.65  Holiday pay = £92,329.51 



Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (forecast % change)
			A further £3,286.23 does not differentiate between.		A further £46,492.03 does not differentiate between. £15,749.73 'other' e.g PPE, non-monetary, and non-GLAA sector recoveries (including holiday pay).
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) – 65 days 
	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	Average of 2019-20 (19-20 tasked cases only) – 86 working days 

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (forecast % change)
	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 = 6 days  ALC = 2 day  Straightforward grant of Licence = 2 day 
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 To add two new protocols in the coming year	Number of protocols = 3 
		Number of businesses signed up to protocols	Construction = 76 Apparel = 16	Construction = 95 Apparel = 20	Construction = 188 members ● Apparel = 19 members ●

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (forecast % change)
			Retail= 3	Retail = 4 To increase the number of signatories on each linked to measure below	Retail = 3 ●
		Increase in the volume of intelligence submissions from those sectors	Construction = 51 Apparel = 10 Retail = 10 (ii)	An increase of 25% in the percentage of actionable intelligence	Construction = 18*  Apparel = 8*  Retail = 1*  *Please see level of General Issues/Referrals for another measure

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (forecast % change)
					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 = 377,351 
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 increase the number of GLAA-led cases To maintain baseline at approximately 40% of cases	Enforcement & NSO investigations = 156  % of investigations in partnership = 47% 
	To address issues impacting the number of sanctionable	GLAA-led convictions Sanctions	Convictions = 6 LMEU = 15 LMEO = 2	To increase all by 10%	Convictions = 5 (+16 other) LMEU = 3

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (forecast % change)
	outcomes resulting from enforcement investigations		Warnings = 31 Enforcement Notices = 17 Cases Referred to CPS =16	New Measure - 80% of cases referred which result in meeting evidential threshold- New Measure- 70% of those case which meet evidential threshold result in positive charging decision-	LME0 = 0 Warnings = 15 Enforcement Notices = 32 Cases referred to CPS = 4 (1 met positive charging decision 3 are under consideration) Cases currently with CPS = 10
	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	Number = 0
5. Develop our people and culture in line with the GLAA's PROUD values, ensuring a diverse, resilient	To improve retention levels, increase diversity and increase satisfaction of GLAA employees	Performance effectively managed and meeting with line manager. Proud to work for the GLAA	81% agree /strongly agree. Baseline 94%	To improve on 2018 baseline To maintain 2018 baseline	No available results No available results

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (forecast % change)
and change-ready organisation		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	New CIPD/ONS measure from April 2019 is 3.54%. 2019-20 YTD % working days lost = 3.25% 
		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 Q2 YTD = 10.7% 
		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 38% Public sector average 46% Ethnicity (BAME) 5.8% (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	Currently 54% of mid-year PADR

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 YTD (forecast % change)
					reviews have been submitted to HR.
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	Underspend (£67,671 as at 31/12/2019)
	To improve on Internal Audit view of GLAA	End of year overall audit opinion	Anticipated to be limited	Moderate	See Finance Summary
		Responses to audit recommendations within agreed timeframes	Percentage of high and medium actions completed by due date	80% of actions completed by due date	See Finance Summary
		Internal audit opinion on risk management	Limited	To move audit risk opinion to Moderate	See Finance Summary

- (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.
- (ii) The construction and garment protocols were signed during the course of 2018 following which there was enhanced intelligence from those sectors



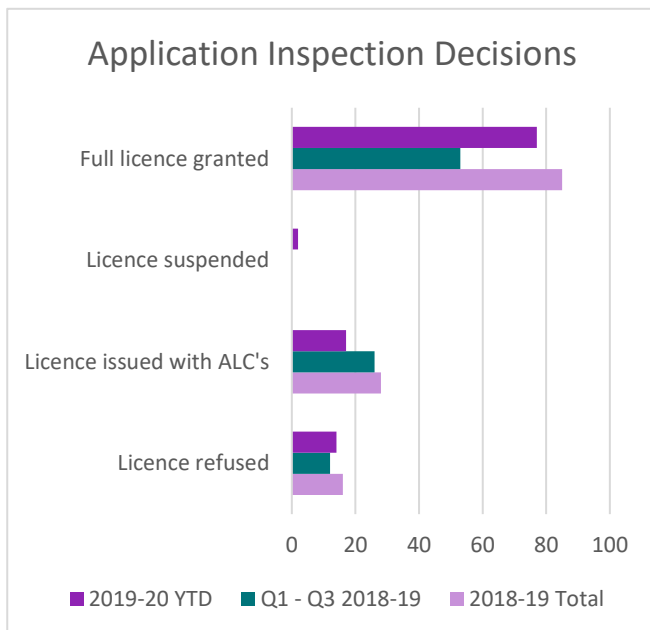
Exploitation

- 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 1,045 GLAA licence holders supplying workers to the GLAA regulated sectors. This is an increase on both the 2018-19 end of year total of 1017 in April 2019, and the 1039 at the end of Q2 2019-20. 114 new licence applications have been made this year to date, 36 of which were made in Q3. 71% of new licence decisions this year to date result in a full licence being granted. New licence applications are most common at the start of a new calendar year.

Licence applications initiated		
April 2018- March 2019	April – December 2019-2020 YTD	% change from April 2018 - March 2019
176 Average 15 per month	114 Average 13 per month	13.6% ↓



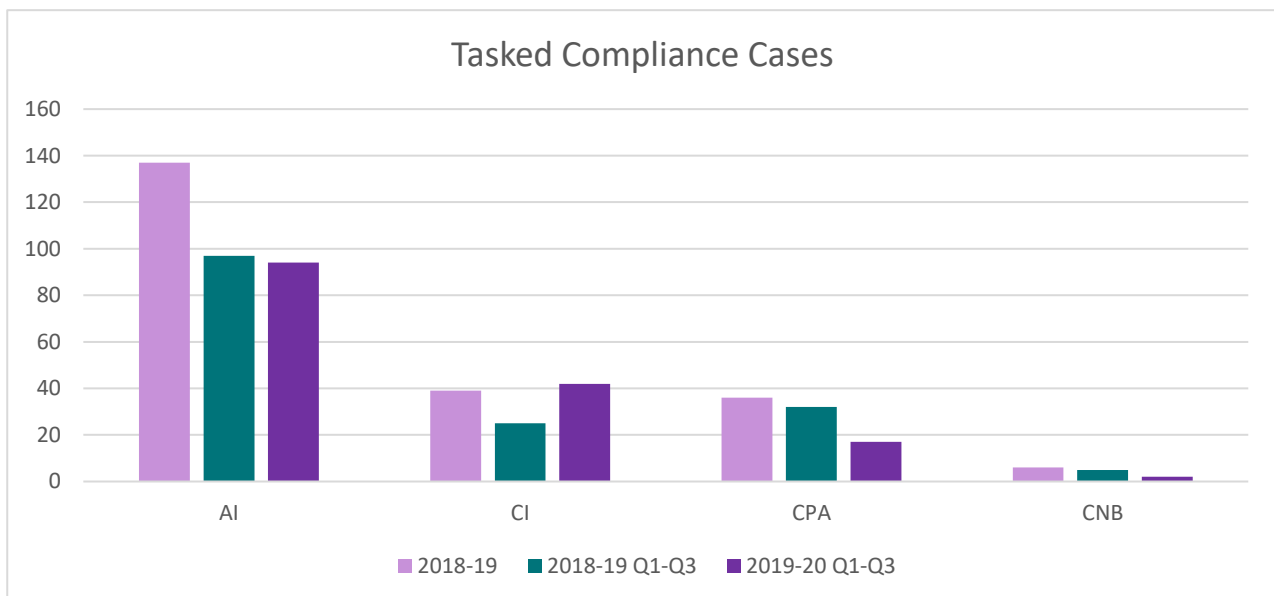
20 licences were revoked during 2018-19, all **without immediate effect**. 2019-20 YTD has seen 19 licences revoked **without immediate effect**, and 1 **with immediate effect** with 3 months of the financial year remaining. 5 revocations without immediate effect occurred in Q3. 2 of these revocations were in relation to standard 1.2 concerning the Principal Authority’s competency. These cases were tasked as a result of the receipt of adverse intelligence and notification that the business had began trading in GLAA-

regulated sectors respectively. 2 further revocations occurred as a result of failing standard 1.1 (fit & proper), and another was revoked for failing standard 2.1 (PAYE, NI and VAT).

Compliance

Compliance Cases tasked			
April 2018 – March 19 End of Year Total	April - December 2019	% forecast change from April 2018 - March 2019.	% change from Q2 to Q3 2019-20
222	155	7% ↓	0% ↔

Compliance cases tasked this quarter are forecast to result in a 7% decrease when compared to the number of compliance cases tasked in 2018-19. This decrease is concentrated to compliance cases only, as this year to date has seen a slight increase in total tasked enforcement and NSO investigations when compared to 2018-19.

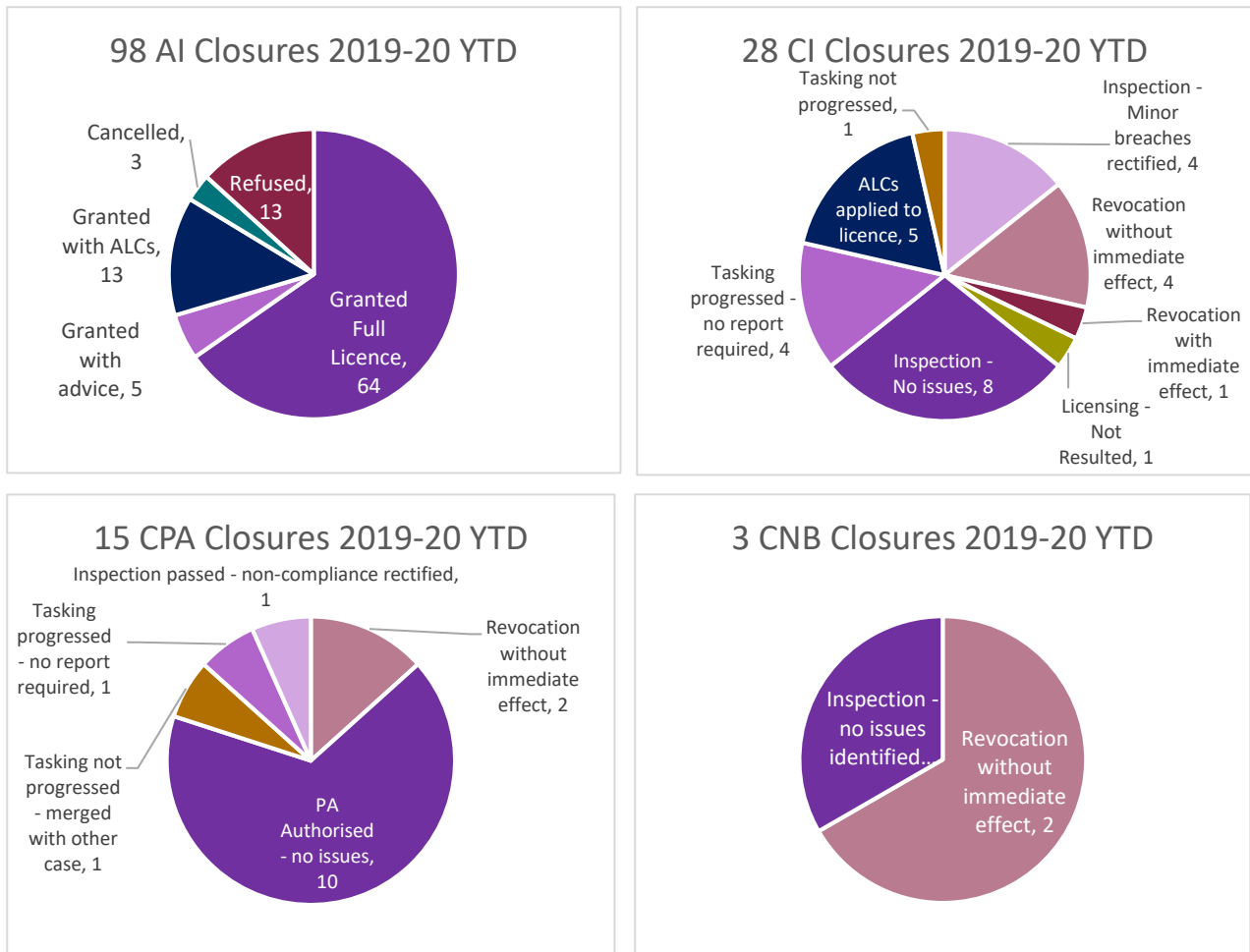


Open compliance cases

There are currently 92 live compliance cases, 2 more than in Q2, 49% of which are CIs and 39% are AIs.

Closed cases by type

144 compliance cases in total this financial year have been finalised, 82 of which were tasked after April 2019.



Breaches identified

	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Total YTD
Breaches identified by inspector	20	32	23	33	37	25	13	42	2	227
Total 2018-19 = 173										

	Apr - 19	May - 19	Jun - 19	Jul - 19	Aug - 19	Sep - 19	Oct -19	Nov - 19	Dec- 19	2019-20 YTD
Licensing breach with Inspection	2	21	6	7	5	7	5	10	2	65
Licensing breach without inspection	0	1	5	5	0	0	1	0	1	13
Total (2018-19) = 123										Total = 78

Appeals

2018-19	Appeals Received	Decision
Refusal	4	3 Dismissed, 1 Withdrawn
Revocation	1	1 Withdrawn

2019-20	Appeals Received	Decision
Refusal	1	1 Ongoing
Revocation	5	5 Ongoing
ALC	1	1 Struck Out
Suspension	1	1 Withdrawn

Communications

GLAA website (filtered view)

	Total users	Total sessions	Total page views
Q1 2019-20	24,506	29,219	104,670
Q2 2019-20*	9,339	10,001	45,420
Q3 2019-20*	47,672	50,212	58,276

*On 11/09/2019, a cookie consent form was introduced on the GLAA website which requires users to opt-in to their record of visiting the website being recorded. As this is an opt-in opposed to opt-out function, this has caused a dramatic fall in available data which is evidenced in the above and below tables in comparison to Q1. A new cookie consent form was introduced on 07/11/2019 and therefore data has started to return to expected levels. Social media stats remained unaffected.

Visits to website broken down by UK City – 2019-20 YTD (Top 10)

City	Users
London	26,393
(Location Not Set)	7,691
Nottingham	2,333
Birmingham	1,690
Leeds	1,214
Manchester	1,134
Liverpool	960
Bristol	844
Newcastle upon Tyne	688
Sheffield	615

There was an increase in visits to the GLAA website in the Boston and Spalding areas in Q3, which appears to be the result of well publicised GLAA unannounced inspections to check the welfare of workers in Lincolnshire over 2 days in October 2019.

Social media breadth (December 2019)

	Number of followers
Twitter	4,390 (131 more followers in than Q2)
Facebook	1,271 followers (60 more followers than Q2)
LinkedIn	3,440 followers (289 more followers than Q2)

Business Change

	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	18	6	896
July - 19	12	13	635
August - 19	2	8	292
September - 19	11	14	1,257
October – 19	8	15	1,700
November – 19	4	21	875
December - 19	1	14	177
TOTAL	72	108	6,871

Freedom of Information (FOI) requests

The GLAA have received 41 FOI requests this year to date, 18 of which were in Q3. 90% (34) of these were responded to within 20 days, 10% (4) were responded to outside of 20 days, 2 are ongoing, and 1 was not progressed as further information was requested but not supplied.

3 complaints have also been received this financial year, and all were responded to within 15 days. These were in relation to an application inspection, a licence refusal & associated press release, and a late payment for translation services. No complaints were received in Q3.

12 parliamentary questions have been processed this financial year, and are published on the GLAA website. An additional parliamentary question was processed by the GLAA, however the government did not publish this due to the lack of time available before the dissolution of parliament.

PROTECT

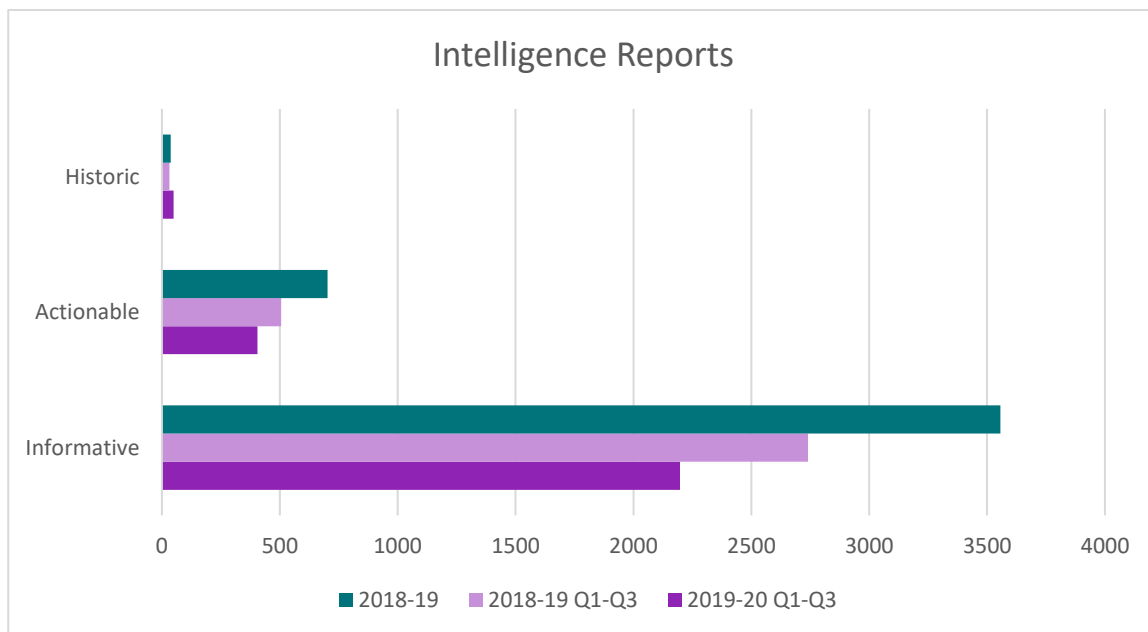
Strategic Priority: Protecting Vulnerable People

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

Intelligence

The GLAA is an intelligence-led organisation that receives intelligence from a variety of different sources such as partner agencies, industry and members of the public. This intelligence also arrives in several different formats, most frequently by email followed by telephone. The number of intelligence reports recorded between Q1 & Q3 is below the amount recorded between Q1 & Q3 of 2018-19, and is an 18% reduction on the forecast total for the year.

	Q1 – Q3 2018-19		2018-19		YTD Q1 – Q3 2019-20	
Intelligence Reports created	3,278		4,296		2,651	
GLAA Sector?	Yes	No	Yes	No	Yes	No
	996	2,282	1,334	2,962	895	1,756
Modern Slavery Indicators	Yes	No	Yes	No	Yes	No
	226	3,052	308	3988	155	2,496



General Issues (referrals)




The number of referrals made to the GLAA regarding potential labour exploitation and modern slavery offences continues to increase year on year since the GLAA obtained new powers in relation to the wider labour market in 2017.

	2018-19 Total	Total April – December 2019-20 YTD	Forecast % change from 2018-19
Created	2,740	2,188	6.5% ↑

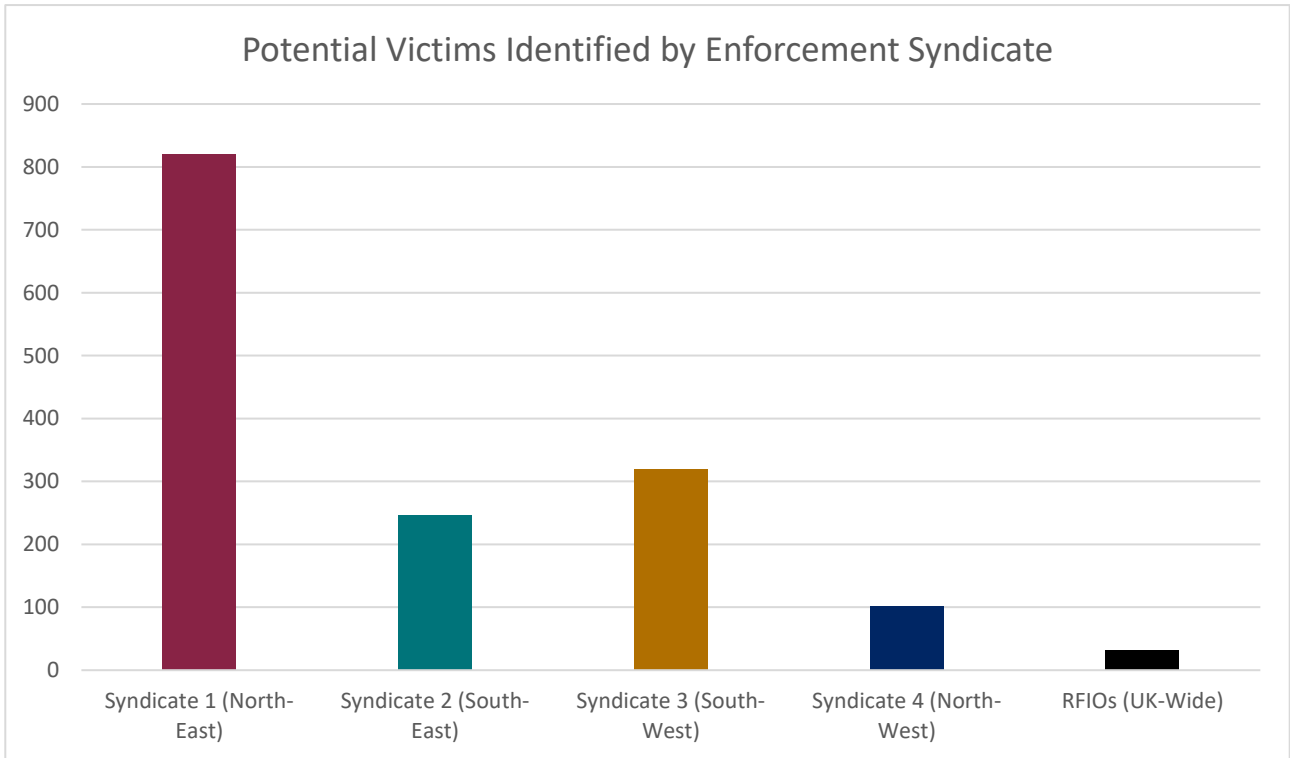
Further fields were added to the General Issue (referral) form on iBase in July 2019 including closing status options such as 'already being actioned by other agency' and 'outside of GLAA powers or scope', making comparisons to both the previous financial year and previous quarter unfeasible.

41% (906) of General Issues created this reporting period resulted in no further action or were recorded as intelligence only, which can be because there was insufficient information to warrant further enquiries, or if the issue did not meet the threshold to commence an investigation. 16% (348) led to an investigation or intelligence development tasking on the case management database Crimson.

Identification and support of victims

	2018-19 Total	2019-20 YTD total	Forecast % change from 2018-19
Potential victims of labour exploitation/licensing breaches identified	7,550	5,816	3% 
Number of NRM Referrals made by the GLAA	33 (plus 13 assists)	7 (plus 18 assists)	28% 
Number of MS1 forms submitted by the GLAA	34 (plus 19 assists)	45 (plus 15 assists)	51% 

The GLAA's 2019-20 Business Plan target is to increase the identification of potential victims of modern slavery and labour exploitation by 10%, which is currently on course to fall short by 7%.



Identification of victims continues to be the greatest in the North-East Syndicate, identifying 54% of all potential victims this year to date, which is somewhat expected given that this syndicate have tasked the most enforcement investigations this financial year.

The sectors in which victims were most commonly identified in Q3 was in the food processing sector, which was also the case at the mid-year point at the end of Q2. The second most common sector where potential victims were identified in Q3 was the hotels, restaurants and hospitality sector, followed by car washing.

Tier 1 intervention

Tier 1 Resolutions		
2018-19 Total	2019-20 Q1 YTD	2019-20 Business Plan Target
72 resolutions	32 resolutions (20 intelligence team, 12 enforcement/compliance teams)	86 resolutions
53 workers affected	1,938 workers affected	64 workers affected
Withheld wages = £2,134	Withheld wages = £1,963.65	Withheld wages = £2,667.50
Holiday pay = £13,823	Holiday pay = £92,329.51	Holiday pay = £17,278.75
	Both = £46,492.03	



A further £3,286.23 – does not differentiate between.	A further £15,749.73 relates to other recoveries, such as refunded PPE payments, and non-regulated sector recoveries such as unpaid overtime.	
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PURSUE

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

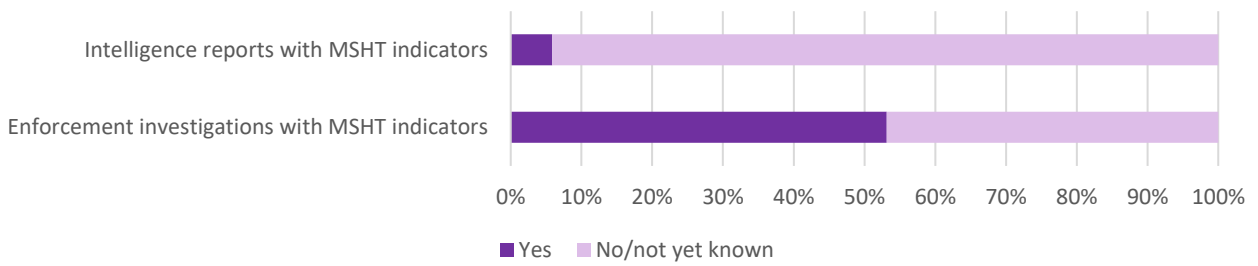
- *Disrupt criminal activity within the labour market*

Enforcement

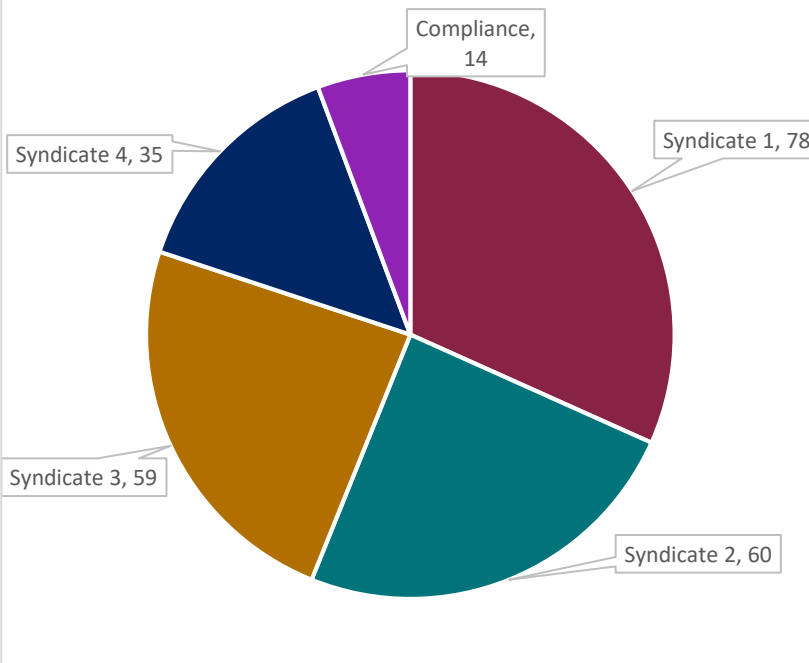
	2018-19	2019-20 YTD	Forecast % change from 2018-19
Enforcement cases tasked	247	192	3.7% 
Non-standard operations (NSO)	57	56	31.6% 

51% of the enforcement cases tasked in Q1 of 2019-20 had indicators of modern slavery/human trafficking. This is followed by 47% of enforcement cases tasked in Q2, and 65% in Q3, bringing the total proportion of enforcement cases tasked with modern slavery indicators to 54% (103).

Enforcement Cases and Intelligence Reports with MSHT indicators 2019-20 YTD

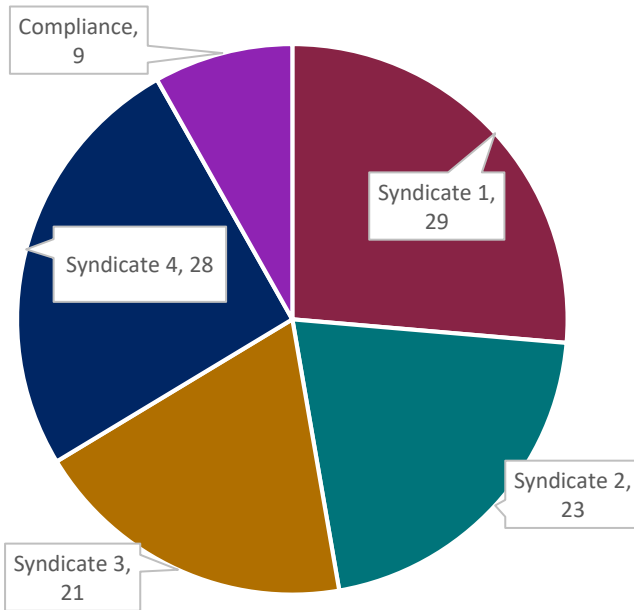


Tasked Enforcement & NSO Investigations 2019-20



Per the first chart to the left, the majority of enforcement and NSO cases in the first quarter of 2019-20 were in Syndicate 1 (North-East), which equates to 32% of all enforcement and NSO investigations tasked this year to date.

Live Enforcement & NSO Investigations

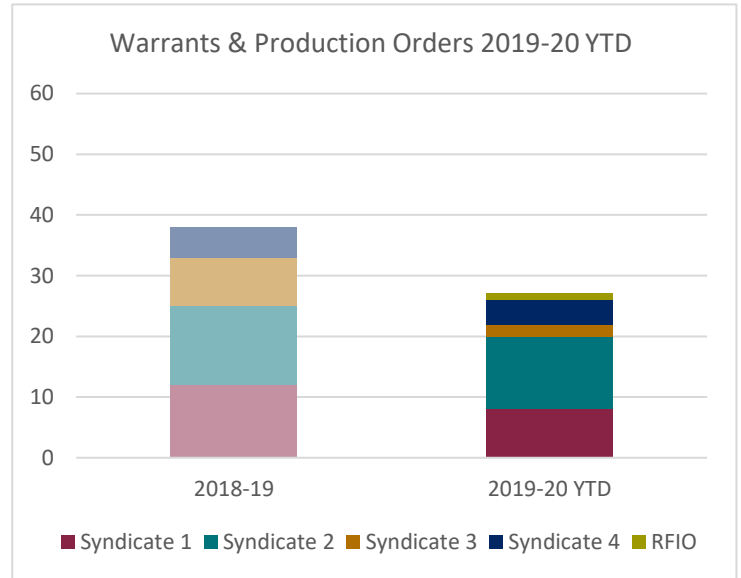
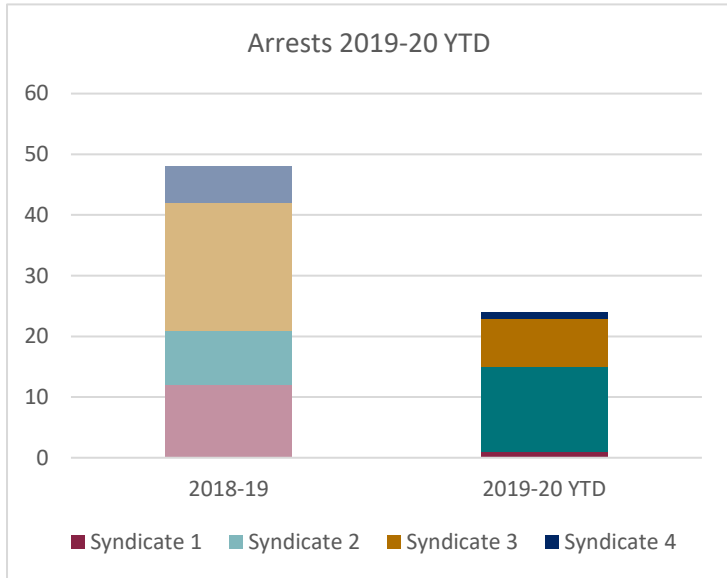


There are currently 110 live enforcement and NSO cases, a decrease of 16 when compared to Q2. At this point in time, the number of live enforcement and NSO investigations is relatively proportionate with the number of cases tasked, with the exception of the North-West, Syndicate 4.

Enforcement cases tasked this reporting period cover a variety of sectors. The most common sector for investigations in Q1 was car washing, where there were marginally more investigations than in the food processing/packaging and agriculture sectors. In Q2, the most common sector for investigation was food processing/packaging, followed by hotels/restaurants & food service, followed by agriculture. In Q3, the most common sector was again food processing/packaging, followed by agriculture and warehousing/storage.

41% of all enforcement and NSO cases tasked this quarter involve some level of partnership working, which is almost exactly the 2019-20 business plan target of 40% of cases.

Arrests and Warrants



April-December 2019 Enforcement case closures					
	Syndicate 1	Syndicate 2	Syndicate 3	Syndicate 4	Total
Convictions	0	0	0	3 (plus 18 'other')	5
Warnings	4	2	1	2	9
Enforcement Notices	7	0	16	2	25
LMEU	0	0	3	0	3
LMEO	0	0	0	0	0

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
ENF	Enforcement Tasking
ENRS	Enforcement Tasking – Non-Regulated Sector
ERS	Enforcement Tasking – Regulated Sector
General Issue	Record of referrals to the GLAA
iBase	The GLAA Intelligence Database
LAWS	The GLAA Licensing Database
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

