



# Gangmasters & Labour Abuse Authority

## Minutes

<b>Title of meeting</b>	GLAA 68 <sup>th</sup> Board Meeting		
<b>Date</b>	29.04.20	<b>Time</b>	10:30
<b>Venue</b>	teleconference		
<b>Chair</b>	Margaret Beels (MB)	<b>Secretary</b>	Jennifer Clarke

**Attendees**

Simon Allbutt (SA)  
William Butler (BB)  
Angela Coleshill (AC)  
Linda Dickens (LD)  
Suzanne McCarthy (SM)  
Michael Rich (MR) CEO  
Paul Williams (PW)

### **In attendance**

Paul Coffey (PC) Head of Communications  
Darryl Dixon (DD) Head of Single Enforcement Body Programme  
Frank Hanson (FH) Head of Prevent and Partnerships  
Nicola Ray (NR) Head of Regulation  
Justin Rumball (JJR) Head of Business & Finance  
Dan Scully (DS) Director of Resources  
Ian Walker (ISW) Head of Intelligence  
Ian Waterfield (IW) Head of Enforcement  
Tom Frost (TF) Performance Analyst (item 13 only)

### **Observers**

Ziggy Macdonald, Home Office  
Kiran Garacha, Home Office  
Olivia Hesketh, Home Office  
Elinor Howard, Home Office  
Dame Sara Thornton, Independent Anti-Slavery Commissioner (items 1- 12 only)  
Edward Bateman  
Julia Mulligan

### **Apologies**

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1	<p><b>Introductions</b></p> <ul style="list-style-type: none"> <li>• The Chair welcomed members of the Board, the GLAA Leadership team and Home Office officials to the meeting.</li> <li>• The Chair warmly thanked Angela Coleshill for her contribution to the Board over the years and welcomed Julia Mulligan her replacement to the meeting attending today as an observer.</li> <li>• To make best use of time, board members prior to the meeting had been asked to make comments on the papers. These were amalgamated into a PowerPoint presentation with key points from the papers’ authors. Attendees had all received the PowerPoint presentation prior to the commencement of the meeting.</li> <li>• The Chair thanked her executive colleagues for their work in preparation for the informal meeting of the Board yesterday which helped to shape the discussion.</li> <li>• The Chair also commended the executive for the efforts to circulate Board papers more or less on time, despite all working from home.</li> </ul>
2	<p><b>Apologies</b></p> <ul style="list-style-type: none"> <li>• As above.</li> </ul>
3	<p><b>Minutes of the previous meeting</b></p> <ul style="list-style-type: none"> <li>• The minutes of the previous meeting were accepted as an accurate record.</li> </ul>
4	<p><b>Declaration of interest</b></p> <ul style="list-style-type: none"> <li>• Julia Mulligan – member of Anti-Slavery Commissioner’s Advisory Panel</li> </ul> <p><b>a) Annual review of Declaration of Interest.</b> Board members are requested to complete the Register of Interest for the 2019-2020 financial year by 7 May.</p> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>1. Board members to complete and return the document before 7 May.</li> <li>2. MB and BB to further review the definition of “Related Parties”</li> </ol>
5	<p><b>Action points</b></p> <ul style="list-style-type: none"> <li>• BM49 (9) (21) closed.</li> <li>• BM50(5) (6) (7) (9) (11) (12) (13) (14) closed.</li> <li>• BM49(6) Board profiles – profiles have been completed. PC to look at further ways of enhancing Board member visibility e.g. PC &amp; AC working on a piece relating to the Food industry. Status remains at ‘in progress’ for regular updates.</li> <li>• BM49(5) BM50 (10) (2) (3) (4) (8) all agenda items which will discharge the actions.</li> <li>• BM49(10) ARC deep dive dates - dates to be arranged for Managing Risk in Prioritising Intelligence and Prevention, the Compliance deep dive took place on 28.04.20</li> </ul>
6	<p><b>Declaration of urgent business</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>

7	<p><b>Home Office update</b></p> <p><b>Note</b></p> <ul style="list-style-type: none"> <li>• The Board noted the report provided by the Home Office (HO) Sponsorship Unit in advance of the meeting.</li> <li>• Elinor Howard gave an update on Finance. <ul style="list-style-type: none"> <li>- The <b>2020-21 budget</b> is indicative, a reprioritisation exercise will be conducted as a result of the Covid-19 pandemic. Departments may need to slow or stop nonessential work to free up funding to pay for the new pressures. The date of the Treasury exercise is tbc.</li> <li>- The <b>Spending Review</b> is on hold, it is expected that this will take place in the autumn – date not known at present.</li> <li>- The GLAA requested as much time as possible if required to submit revised bids</li> <li>- An HO view of non-essential work was sought. EH stated there was no definitive view.</li> <li>- MB added that the GLAA would struggle to identify anything that isn't essential. BB expressed concern that some definitions of non-essential might equal GLAA, but policy areas governing GLAA's work have a significant role, and the GLAA has an essential role not least due to the COVID-19 employment situation. There is a need to invest not save.</li> </ul> </li> <li>• Kiran Garcha gave an update on policy. <ul style="list-style-type: none"> <li>- <b>Transparency in Supply Chains Consultation (TISC)</b> - HO are analysing responses to the consultation guidance, advice to be sent to the Ministers in due course.</li> <li>- HO have published <a href="#">guidance</a> on www.gov.uk to support business in addressing and reporting on their modern slavery risks. HO with GLAA colleagues have submitted a bid for funding from the Shared Outcomes Fund to develop projects in the nail bar and hand car wash sectors. Treasury are reviewing the bids; a delay is anticipated.</li> <li>- <b>Single Enforcement Body (SEB)</b> - HO Ministers have agreed that it is critical that the LAPO powers should be retained under the new SEB. The timing of the Employment Bill which would effectively be the vehicle to bring in primary legislation to establish the SEB is likely to be delayed. It is likely to be the autumn before the draft Bill and policy paper in response to the SEB consultation is published.</li> <li>- <b>Seasonal Worker's Pilot</b> - the Government has announced that the annual quota for the second year of the pilot will increase from 2,500 places to 10,000 places. The pilot will run until the end of December 2020 and will be monitored by HO &amp; Defra.</li> <li>- <b>Immigration policy changes</b> - following Brexit an Immigration Bill with proposals to bring in a points-based system to attract high-skilled workers will be introduced.</li> </ul> </li> <li>• PW raised this issue of a risk assessment of immigration changes re the increase in modern slavery and forced labour offences. KG is working closely with the migration policy unit on this matter.</li> </ul>
8	<p><b>Single Enforcement Body (SEB)</b></p> <p><b>Note</b></p> <ul style="list-style-type: none"> <li>• DD gave a verbal update on the Executive Summary of UK Labour Market Enforcement Strategy 2020-2021.</li> <li>• There is ongoing joint work with NMW/EAS as identified in the DLME's strategy.</li> <li>• The work post consultation is delayed but acceleration is likely later.</li> </ul>

9	<p><b>Update from Dame Sara Thornton, IASC</b></p> <p><b>Note</b></p> <ul style="list-style-type: none"> <li>• Dame Sara Thornton, Independent Anti-slavery Commissioner and Edward Bateman, on secondment from the SIA to the Commissioner’s team, were welcomed by the Chair to the meeting.</li> <li>• Strategic Plan 2019-2021 - This focuses on (i) better victim care (ii) supporting law enforcement (iii) prevention (iv) getting value from research and innovation. Dame Sara outlined the desire to develop further opportunities for joint work including GLAA on prevention and enforcement. She asked GLAA whether the MOUs in place with police were up to date and working well?</li> <li>• Operation Fort resulted in convictions for slavery trafficking and money laundering offences with sentences ranging from 3 - 11 years. The IASC contacted major retailers after this operation canvassing their support with good results.</li> <li>• Dame Sara discussed the Coronavirus challenges <ul style="list-style-type: none"> <li>(1) impact on victims/survivors;</li> <li>(2) economic fragility for workers - laying off and forced into precarious work or rapid recruitment and move between sectors;</li> <li>(3) disruption to the efforts of those tackling exploitation</li> </ul> </li> <li>• The organisation should consider what more it can do to raise awareness of its COVID-19 response, particularly with NGOs as they are raising some concerns.</li> <li>• Dame Sara suggested that careful consideration should be given on how support for TISC audit, registry and enforcement complement core capabilities. She also outlined the maturity framework developed by her office and welcomed any GLAA comments, including how its work on sector protocols would fit in.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>3. Check that the National Police Chief Council’s /GLAA MOU is working nationally.</li> <li>4. GLAA to inform key stakeholders (e.g. NGOs) of its ongoing capabilities during COVID-19 shutdown.</li> <li>5. GLAA to consider whether its experience of protocols could add value to the IASC maturity model.</li> </ol>
10	<p><b>Director of Labour Market Enforcement (DLME) Recommendations</b></p> <p><b>Note</b></p> <ul style="list-style-type: none"> <li>• DD informed the Board that the DLME strategy has now been submitted to BEIS/HO ministers for approval.</li> <li>• Government has commenced work on the response to the Recommendations.</li> <li>• Timing of the strategy and Government recommendations are out of synch with our planning cycle if we are to include them (where accepted by the Government). The Government response on the 2019-20 strategy recommendations has yet to be issued and the response to the 2020-21 strategy was unlikely to be soon.</li> <li>• Some recommendations which the GLAA supported in principle would require allocation of additional resources. <ul style="list-style-type: none"> <li>Two require clarification on specifically what is meant at a detailed level (e.g. 8, 11)</li> <li>two are rejected 9 and 13.</li> </ul> </li> <li>• It was agreed to invite Matthew Taylor, DLME to a future Board meeting as part of the working relationship.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>6. Invite DLME to future Board meeting.</li> <li>7. MR to flag up the resource issues to DLME and HO.</li> </ol>

11	<p><b>Strategic Plan 2020 – 2023 and Business Plan 2020-2021</b></p> <p><b>Note</b></p> <ul style="list-style-type: none"> <li>• The Board noted the update on the Strategic Plan 2020-2023 and the Business Plan 2020-2021.</li> <li>• DD &amp; MR to reflect on expanding the list of organisations with whom to engage when supporting victims on page 19 e.g. Police commissioners. Editorial suggestions were noted on the draft document which is still work in progress.</li> <li>• Any further suggestions on Part 1 &amp; 2 should be submitted by 1 May along with any observations regarding Part 3, which was still being drafted, but required to be settled as soon as possible into the financial year.</li> <li>• Consent was given to the Chair and Deputy Chair for final sign off of the document.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>8. Board members to submit comments by 1 May on Parts 1, 2 and 3.</li> <li>9. DD &amp; MR to review wording of page 19.</li> </ol>
12	<p><b>Financial position</b></p> <p><b>Approval of Budget/medium term forecast</b></p> <p><b>Note</b></p> <ul style="list-style-type: none"> <li>• The Board noted the report giving an update on the outturn 2019-20 and an update on the progress with balancing the 2020-21 budget.</li> <li>• There are no significant changes in the outturn.</li> <li>• The GLAA needs to be clear on which vacancies to fill and when, and not use them as the control valve on spend to balance the budget.</li> <li>• It was agreed an efficiency and productivity plan to give focus should be produced.</li> <li>• Pay costs were 71% of the budget. If there are budget cuts, they will affect people numbers. The additional funding cases provided some risk mitigation in the event that redeployment might be needed.</li> <li>• The Business Plan activities needs to be clear in their priority order.</li> <li>• The GLAA needs to review the relevance of its current asks and whether there are new issues that are even more essential, or new circumstances that may enhance existing ones or new cases.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>10. Produce an efficiency and productivity plan.</li> </ol>

13	<p><b>Performance</b>  <b>i) Q4 January – March 2020</b>  <b>Note</b></p> <ul style="list-style-type: none"> <li>• The Board noted the performance report for Q4 January - March 2020.</li> <li>• Tom Frost presented the key findings and progress against these.</li> <li>• Victim Identifications and monies recovered for victims were above target but NRM referrals below.</li> <li>• Licensing decisions and inspections were taking less time, but volume of inspections has been raised and COVID-19 would have an impact.</li> <li>• Surveys suggested that the protocols and other on-line activity was assisting with the Prevent message.</li> <li>• Effective disruption had been done in the regulated sector, but more was needed to get criminals to court.</li> <li>• Despite financial pressures the GLAA had come in with a small underspend in 2019-20.</li> <li>• It was suggested that when looking at staff absence the GLAA should consider making a comparison v enforcement rather than by public sector as a whole. Such comparisons might also be made as regards diversity.</li> <li>• PW commented on the shift on the NRM to MS1 referrals in terms of balance and the need to understand what is happening and also the GLAA engagement with “assists”.</li> </ul> <p><b>Action</b>  11. Changes to the report requested  i) More information in the monies recovered for workers - from how many employers and how many employees.  ii) Giving proportions rather than just the numbers (raw scores) would provide more useful picture of performance in relation to some measures.</p>
14	<p><b>6-month HR update</b>  <b>Note</b></p> <ul style="list-style-type: none"> <li>• The Board noted the report providing an update on key people, HR and Learning and Development matters.</li> <li>• The outcomes are not dissimilar to the last report.  Currently the GLAA has a total of 42 female employees and 73 male employees (37% female 63% male split).  Total absence has decreased by 1.35% during this reporting period.</li> <li>• Work which has lapsed within HR on workforce diversity and representation is to be resumed.</li> <li>• Staff turnover was a concern. Exit interview data continues to be reviewed by the Vacancy Control Panel.</li> <li>• Concerns were again raised regarding the BAME and gender split of the GLAA. It was agreed that the new Head of People and Change, when in post, should produce a clear action plan for achieving workforce diversity and better BAME representation. The plan should include measurement.</li> <li>• PDPs are now being collated to plan for next year’s learning and development</li> <li>• Health &amp; Safety (H&amp;S) - the external review has been completed. The H&amp;S policy has been signed off and the terms of reference for the H&amp;S committee revised. Lee Watson has been designated as the Competent Person.  LD will be representing the Board at Health &amp; Safety committee meetings.  The Board requested regular H&amp;S updates.</li> </ul> <p><b>Action</b>  12. Produce an action plan to address the workforce diversity and better BAME representation.  13. Continue to provide H&amp;S updates.</p>

15	<p><b>COVID- 19 review</b></p> <p><b>Note</b></p> <ul style="list-style-type: none"> <li>• Ian Waterfield, Gold command gave a verbal update on the move to working from home for the entire operation and the operational response due to lockdown.</li> <li>• Board members praised this impressive and timely response. GLAA colleagues should be rightly proud of what has been achieved.</li> <li>• The GLAA Gold team continue to meet weekly and are planning for post COVID-19, it is considering the changes the organisation has made and if we want to embed them going forward.</li> </ul> <p>A Lessons Learned exercise will be carried out with the involvement of the whole organisation. This will include how the GLAA approached the pandemic and the changes to working practices.</p> <ul style="list-style-type: none"> <li>• BB noted the importance of having records made at the time covering governance of GLAA decisions notably on temporary licences to demonstrate how we are managing risk. This was separate from any lessons learned exercise in relation to COVID-19.</li> <li>• PW suggested in the lessons learnt exercise we include how we improved communications for GLAA colleagues working from home or what we could do better.</li> <li>• It was noted that mandatory refresher training for some LAPOs had not taken place due to the current circumstances. BB said he was aware in other disciplines with which he was familiar, formal dispensations were being given deferring the need for formal update training.</li> </ul> <p><b>Action</b></p> <p>14. Produce a paper for the Board on the temporary licensing easements/risk management during COVID-19 pandemic.</p>
16	<p><b>Process for Annual Report &amp; Accounts 2019-2020</b></p> <ul style="list-style-type: none"> <li>• The Board noted the update on the work underway to prepare the 2019-20 Annual Report and Accounts (ARA). Timescales were uncertain but getting as much ready as quickly as possible seemed a good approach.</li> </ul> <p><b>Timetable</b></p> <ul style="list-style-type: none"> <li>• 4 May closure of the financial year and production of final accounts</li> <li>• 6 May finalised and verified performance outturn reporting</li> <li>• 18 May narrative and layout draft version - director review &amp; amendments</li> <li>• 22 May delivery of draft ARA to Board members</li> <li>• 01 June completion of Board and HO comments (one round only) a finalised version for closure pending NAO review.</li> </ul> <ul style="list-style-type: none"> <li>• ARC requested a more matter of fact ARA focused on completion of deliverables.</li> <li>• The format of the ARA is to follow that of the Business Plan for 2019-20 to improve read across between the documents.</li> <li>• The Board agreed to delegate final approval for the ARA 2019-20 to the Chair together with the Chair of the Audit and Risk Committee.</li> </ul> <p><b>Action</b></p> <p>15. Submit draft ARA to Board members on 22 May for comments by 1 June.</p>
17	<p><b>Risk Management</b></p>
	<p><b>a) 6-month review of Risk appetite</b></p> <p>The Board noted the report providing an update on strategic risk management, data protection and GDPR compliance and business continuity planning. Work continues around the Risk Policy which will be presented at the next Board meeting.</p> <p><b>Action</b></p> <p>16. Add the Risk Management Policy to the July Board agenda.</p>

	<p><b>b) Updated Strategic Risk Register</b>  The Strategic Risk Register has been updated with two new risks which have been reviewed by the Leadership team (impact of Restructuring and of COVID-19). All current strategic risks have been re aligned to name a new owner and actioned. Further columns have been added to the register to enable the provision of monthly updates and revised scoring.</p>
	<p><b>c) Appetite setting for any new strategic risks</b>  <b>Action</b>  17. A lessons learned exercise is to be carried out relating to the restructure.</p>
18	<p><b>Review of Board performance results</b>  <b>Note</b></p> <ul style="list-style-type: none"> <li>• The Board noted the report on the findings from the annual Board evaluation.</li> <li>• A new area around the values had been introduced in the survey.</li> <li>• The Board needs to consider the issue of its relationship with the executive.</li> <li>• Board members are to reflect on the survey results and make further proposals to the plan to be submitted to MB by 7 May.</li> </ul> <p><b>Action</b>  18. In light of comments, the Board to agree an action plan and how it will monitor progress.</p>
19	<p><b>Board's collective objectives for 2020-2021</b>  <b>Note</b></p> <ul style="list-style-type: none"> <li>• As part of the annual appraisal process Board members agree a set of objectives accepting individual and collective accountability. The Board noted the paper setting out the 7 proposed Corporate Objectives for the GLAA Board 2020-21.</li> <li>• Two further suggested improvements to objective 6 &amp; 7 were presented. These suggestions were accepted.</li> </ul> <p><b>Action</b>  19. The Board to adopt Collective objectives and to agree with the Chair their individual objectives.</p>
20	<p><b>Audit &amp; Risk Committee</b></p> <p><b>a) Chair's Update</b></p> <ul style="list-style-type: none"> <li>• The Board noted the report of the Audit and Risk Committee (ARC) held on 19.03.20</li> <li>• A COVID-19 update had been given at this meeting.</li> <li>• Good progress on the Internal Audit recommendations has been made but an overall Limited Assurance option still remains.</li> <li>• An Internal Audit report on Corporate Governance with a moderate assurance rating had been presented.</li> <li>• The Internal Audit plan was agreed.</li> <li>• 2018-19 ARA has been signed and laid before Parliament.</li> <li>• The final version of the second GIAA report has also been signed off. The CEO has prepared an action plan, ARC requested a progress report by September 2020.</li> </ul> <p><b>Action</b>  20. Circulate Internal Audit report on Corporate Governance to the Board.  21. CEO to present progress report on action plan to ARC in September.</p>



21	<b>Remuneration Committee</b>
	<p><b>a) Chair's Update</b></p> <ul style="list-style-type: none"> <li>• SA gave a verbal update of the Remco meeting held on 17.04.20 where the CEO objectives were discussed.</li> <li>• Voluntary redundancy requests have been scrutinised by Remco and the consideration of compulsory redundancy.</li> </ul>
22	<p><b>Liaison group update</b></p> <p><b>Note</b></p> <ul style="list-style-type: none"> <li>• The Board noted the paper containing the draft minutes of the Worker/NGO Liaison group meeting held on 7.01.20 and joint Labour User/Labour Provider &amp; Worker/NGO Liaison group meeting held on 03.03.20.</li> <li>• It was confirmed that the lead for stakeholder groups was now the Head of Prevent and Partnerships.</li> <li>• An action plan from the joint liaison group workshop groups is to be produced by MR/FH.</li> <li>• Ascertain why people didn't attend the joint meeting in an attempt to increase attendance. SA asked if participation could be increased by using a video conference approach.</li> <li>• Need to identify a new Chair of the Worker/NGO liaison group as AC leaves the Board.</li> <li>• PC mentioned a joint initiative with Crimestoppers to try to reach Romanian workers seeking jobs in the UK to inform them of their employment rights.</li> </ul> <p><b>Action</b></p> <p>22. Produce an action plan from the joint liaison group meeting.</p> <p>23. Assess why members of liaison groups didn't attend the joint meeting in March.</p> <p>24. Circulate an outcome from the Facebook /Crimestoppers campaign.</p> <p>25. Chair to identify new chair for Worker/NGO Liaison group.</p>
23	<p><b>Any other business</b></p> <p><b>a) Meeting review</b> – a review of the meeting which was the first GLAA Board meeting to be run by video conference was given by all attendees. The general feeling was that the technology arrangements had worked very well, and this had facilitated quality discussion for the key items. Future meetings of Board members might continue to use this medium, though Board meetings themselves were thought to be better face to face.</p>
24	<b>Close</b>
	<b>Date of next meeting 22 July 2020 @10:00</b>