



Gangmasters &
Labour Abuse Authority

GLAA 2020-21 Q1 Performance Report

Reporting period: April 2020 – June 2020

Previous year April 2019 - March 2020

Public Facing

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Business Plan Objectives

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	20-21 progress
1. Identify and support victims of labour exploitation	To work towards prioritising victims as part of our investigations	Potential victims assisted (directly/indirectly)	Victims identified = 7,396	8,135*	2,152
			NRM and MS1 referrals combined = 105	To increase the overall number of NRM and MS1 referrals by 10% to 116	NRM and MS1 referrals combined = 77
		New: To identify the percentage of investigations resulting in the identification of victims	Baseline = percentage of investigations that identified NRM or MS1 referrals in 2019-20 = 12%	To increase the percentage of cases generating a NRM or MS1 from the baseline	7%
		Numbers of Tier 1 resolution (Regulated Sector Only)	72**	To increase from the baseline of 72 and 110 by 30%	7
		The overall number of workers affected	110**		612

Note:

* The baseline used to set the 2020-21 target is based on performance from 18-19, from the identification of victims from enforcement action plus the number from identified licence breaches plus 10%. The 18-19 figures have been used for this target due to the exceptional number of victims identified from compliance inspections (13,005) and specifically one compliance case in 2019-20 where 7,500 potential victims were identified alone.

** As an exception based on a significant case the baseline remains the 2018-19 level of 72 and 110 respectively, but projecting a higher percentage increase than for the 2019-20 target

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	20-21 progress
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	Baseline for 19-20 = 66 working days (19-20 average performance)	to reduce the average to 50 days	*Cases closed in 20-21 only 127 working 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	Baseline for 19-20 = 88 working days	to reduce to 90% in 80 days	*Cases closed in 20-21 only 163 working days
	To review time taken to make licensing decisions	Days taken to make licensing decision once all information is available	Revocation = 6 days ALC = 3 days Grant of Licence = 2 days	To Improve to Revocations 5 days, ALC = 2 days, and 1 day respectively	Revocation = 11 days ALC = 8 days Grant of licence = 4 days

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	20-21 progress
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	Level of engagement and level of workers covered through protocol development	No previous baseline	To increase number of workers covered by GLAA–stakeholder liaison per year by 10% in supporting GLAA industry protocols	Of top 100: 97,000 out of 250,00
		Level of change reported by signatories to improve due diligence, identified by surveys of protocol signatories (compared to reported change in the preceding year)	No previous baseline	To develop the baseline from first full round of surveys with all protocol group signatories	To be confirmed
	To increase awareness of modern slavery and labour exploitation through external training, engagement with stakeholders and the dissemination of messaging using a range of communications activity (traditional media, social media, digital engagement)	Level of activity across digital engagement channels and the accumulated reach (social media, website visits)	(a) 2,928 posts (b) 399,087 average monthly impressions	To increase by 10% (a) activity to 3,220 and (b) impressions to 438,996	(a) 705 posts (b) 308,905 average monthly impressions
Assessing the knowledge of stakeholders around MS and labour exploitation through surveys Accurately assess the GLAA's levels of engagement with its social and digital media audiences to gain greater insight		No previous baseline	To develop the baseline of enhanced engagement (impact/reaction) of increased social and digital media activity	To be confirmed	

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	20-21 progress
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	No. undertaken = 226	To maintain baseline 226	48
		Investigations undertaken in Partnership	No. undertaken = 164	To maintain baseline at approximately 40% of cases – target 140 (based on total investigations)	15
	To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations	GLAA-led convictions	Convictions = 8 LMEU = 6 LMEO = 0 Warnings = 23 Enforcement Notices = 43	Convictions = 10 LMEU = 18 LMEO = 1 Warnings = 34 Enforcement Notices = 47	Convictions = 0 LMEU = 1 LMEO = 0 Warnings = 0 Enforcement Notices = 2
		Sanctions [^]	No previous baseline	To establish the baseline of the percentage of completed enforcement investigations cases in 2020-21 that resulted in a prosecution or other sanction ^{^^}	8% Finalised cases resulting in either a warning, LMEU/LMEO, notice or conviction
[^] Due to the different sanctions used to achieve proportionate outcomes in 2019-20, the targets for 2020-21 reflect an increased target on performance in 2019-20 for prosecutions, enforcement notices, and the 2018-19 baseline target for LMEUs/LMEOs and Warnings.					
^{^^} This is a new measure. The baseline will be established in 2020-21. The number of completed cases will not directly correlate to the first target under 4 (increasing the number of investigations in 2020-21) because the 2020-21 performance will include cases closed that were initiated in 19-20.					

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	
5. Develop our people and culture in line with the GLAA's values, ensuring a diverse, resilient and change-ready organisation	To improve retention levels, increase diversity and increase satisfaction of GLAA employees	People Survey Results~ Assess people satisfaction based on:			
		Performance effectively managed and meeting with line manager	81% (baseline)	81% (maintain baseline)	To be confirmed
		Proud to work for the GLAA	94% (baseline)	94% (maintain baseline)	To be confirmed
		Treated with fairness and respect	84% (baseline)	84% (maintain baseline)	To be confirmed
		Average sickness rates	2.98% (public sector 2.9%)	maintain or reduce 2019-20 level of 2.98%, and remain under public sector rate of 2.9%	0.46%
		Average people turnover	21.6%	reduce 2019-20 level and remain under public sector rate of 17.9%	3.5%
		To move closer to the national workforce figures based on (a) gender and (b)	(a) 37% (Public Sector 46%) (b) 5.8% (Public Sector 9.9%)	Move towards the public sector (a) gender and (b) ethnicity reducing the difference to within 10% of the public sector rate within	36% female 5%

		ethnicity	100% of staff declared gender	2020-21, and (c) Maintain the baseline of the number of staff who declare gender, and	100% of GLAA employees have declared their gender.
			51 employees have not declared their ethnicity	(d) reduce by 10% from the baseline the number of staff who do not declare ethnicity	46% - 51 GLAA employees have not declared their ethnicity
		No. of the proportion of personal development plans submitted compared to staff in post figure, and the proportion whose development requests are met in year that have training and/or development input	No previous baseline	80% of staff have a PDP 80% of staff with a PDP have their requirements met	To be confirmed
Note: ~ As a people survey has not been run during 2019-20, the target for 2020-21 is to be measured against the outcomes from the last people survey completed					

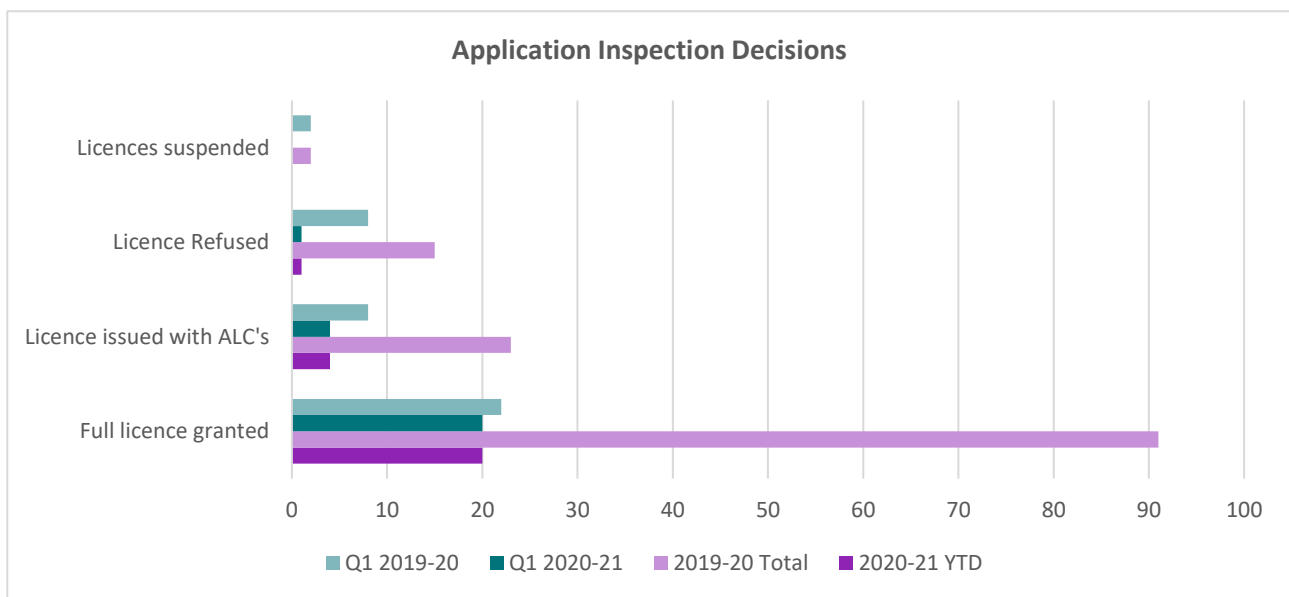
Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	20-21 progress
6. Provide efficient and effective services, sound governance, robust risk management and value for money	To deliver a balanced budget, deliver on savings targets and improve links between finance and performance	Performance against budget	Cash (0.5%)	Cash 2%	To be confirmed
		Medium term forecast provides a balanced budget that shows impact on activity and outcomes	Balanced Budget	Balanced Budget	To be confirmed
		Identification of non-cash efficiencies, with focus on technological improvements	No previous baseline	5% (10 productive days per employee)	To be confirmed
		GLAA better understands cost of activities and outcomes.	Cost apportioned licensing and enforcement No previous baseline	Develop cost model for full range of GLAA activities and outcomes Control strategy includes assessment of resource	To be confirmed
	Improve Accounting Officer Assessment of Assurance	Self-Assessment against assurance model	Limited	Moderate	To be confirmed
	Improve end of year overall Internal audit opinion	No. of overdue audit actions No. of open audit actions No. of closed actions No. of open high priority actions	Limited	Moderate	To be confirmed
	Manage GLAA data in line with internal policy and requirements of legislation	Assessment by DPO as agreed with Audit and Risk Committee	No previous baseline	To be assessed as compliant	Assessment awaited

Prevention

Licensing

Currently there are 1,008 GLAA licence holders supplying workers to the GLAA regulated sectors.

Licence applications initiated		
April 2019- March 2020	April – June 2020	Quarterly % change from 2019 - 2020
147 Average 12 per month	53 Average 18 per month	44% ↑

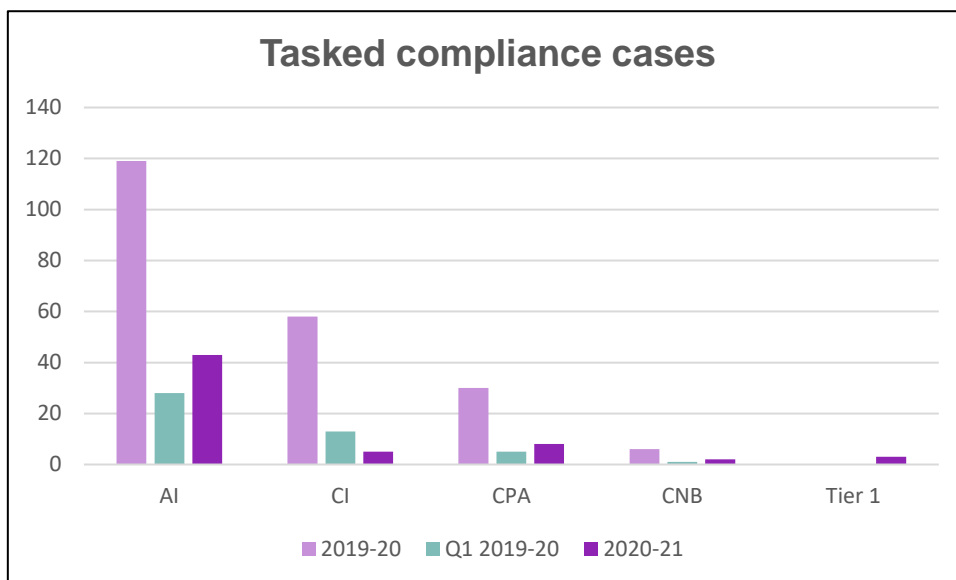


2019-20 saw 20 licences revoked **without immediate effect**, and 3 **with immediate effect**. This quarter, 6 GLAA licences have been revoked, all without immediate effect.

Compliance

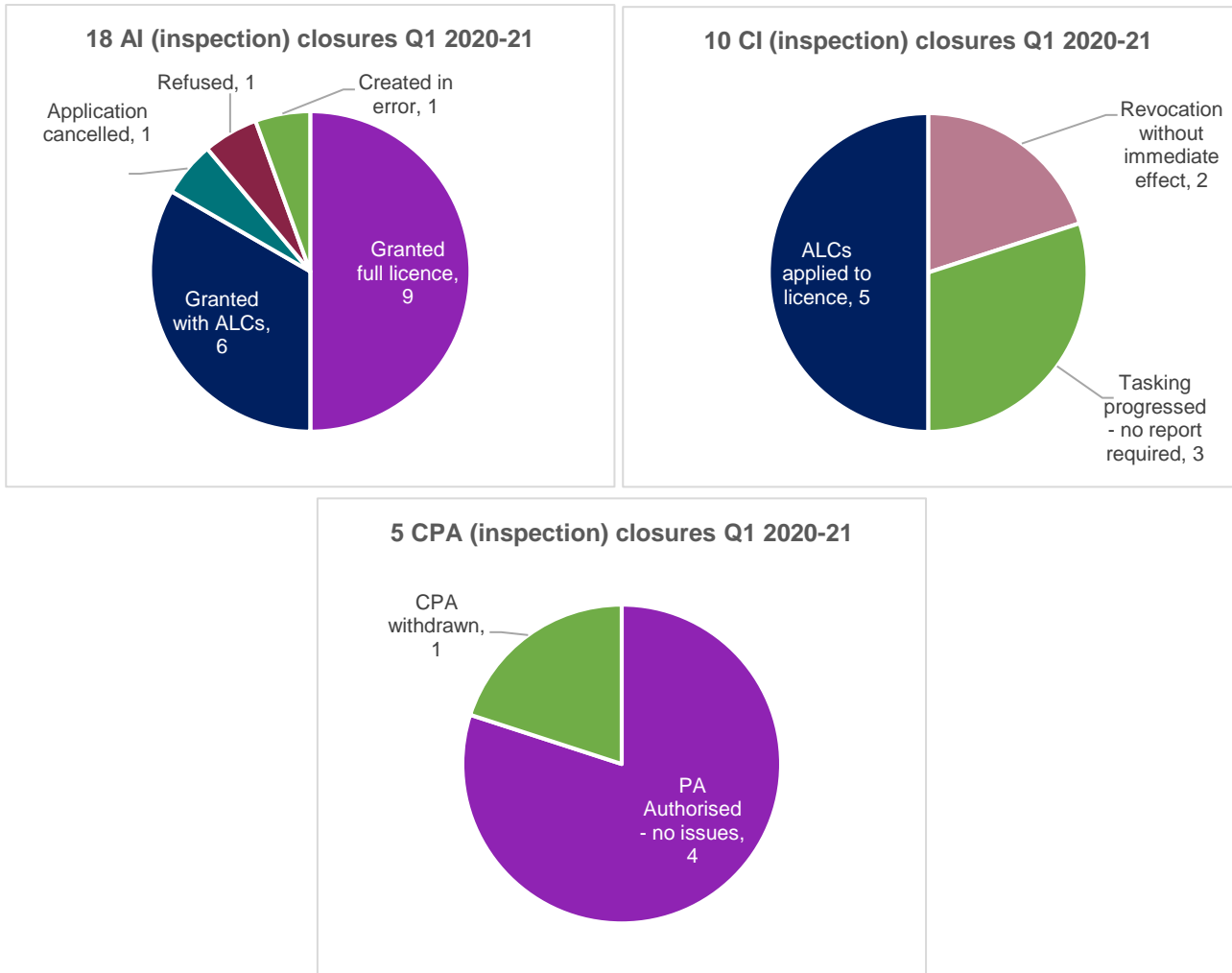
Compliance Cases tasked Q1 2020-21		
2019-20	2020-21	% change (quarterly)
213	61	15% ↑

Compliance cases tasked this quarter have increased by 15% when compared to the quarterly average of the previous year. This increase is concentrated to AIs, CPAs and CNBs, whilst CIs have decreased slightly.



Closed cases by type

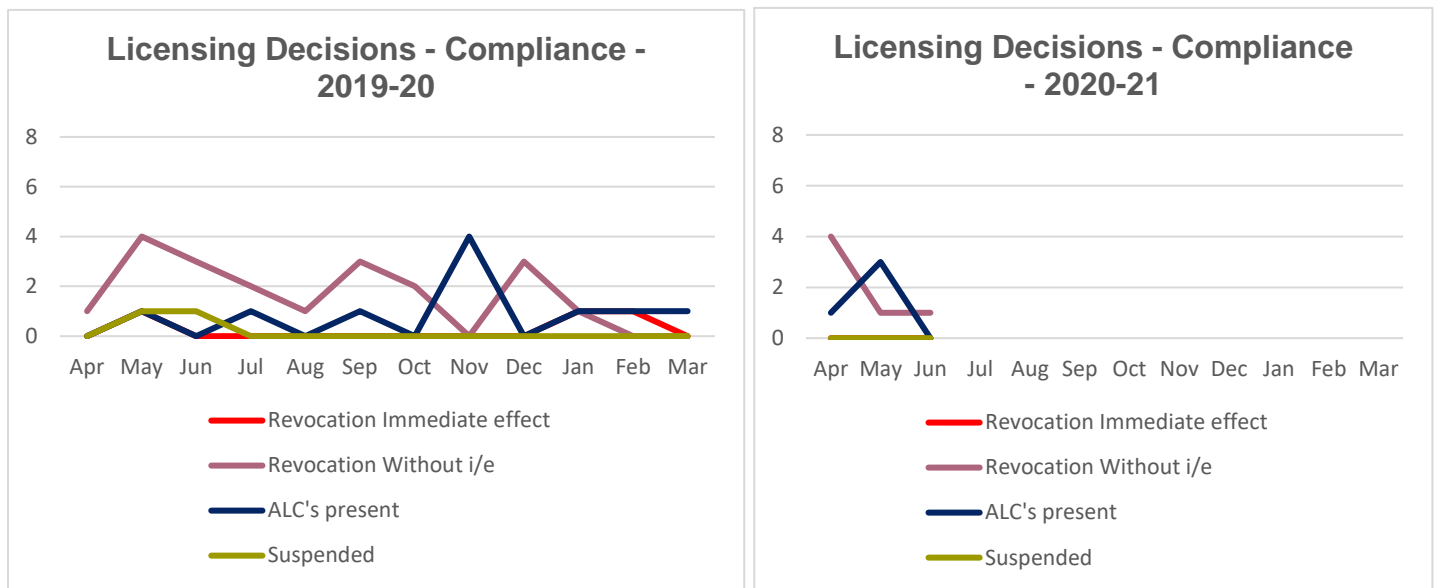
33 compliance cases in total this financial year have been finalised, all of which were tasked before Q1 of 2020-21.



There was a slight increase in the number of ALC's issued to existing licences this year, with 4 licences issued ALCs this quarter compared to 1 in Q1 of the previous year. The ALCs to existing licences this quarter relate to standards 2.2 (paying wages), 3.2 (restricting a worker's movement, debt bondage and retaining ID documents), 6.1 (assigning responsibility and assessing risk), 5.6 (Disciplinary and grievance procedures), 6.2 (instruction & training), and 6.3 (safety at work).

It is important to recognise that the number of licence revocations will not necessarily match the number shown in the 'closed cases by type' figures. This is because in some instances a licence may be revoked if, for example, an ALC has not been complied with, and therefore it may be revoked without an inspection case being tasked.

An illustration of decisions in 2019-20 and 2020-21 on existing licences is shown below.



Appeals

2019-20	Appeals Received	Decision
Refusal	1	1 ongoing
Revocation	8	4 ongoing, 1 dismissed, 2 withdrawn by appellant, 1 withdrawn by GLAA
ALC	1	1 struck out
Suspension	1	1 withdrawn

2020-21	Appeals Received	Decision
Revocation	1	1 ongoing

Communications

GLAA website (filtered view)

	Total users	Total sessions	Total page views
Q1 20-21	9,685	13,553	34,111

In June 2020, an issue was identified with the GLAA website cookie control tool, which means that Google Analytics has not been picking up visitors. It is expected that website data will return to normal levels in Q2.

Visits to website broken down by UK City in Q1 (top 10).

City	Users
London	23,286
(Location Not Set)	5,108
Slough	1,732
Cardiff	1,139
Birmingham	899
Sheffield	773
Nottingham	763
Leeds	613
Manchester	535
Glasgow	534

Social media breadth (June 2020)

	Number of followers
Twitter	4,720 (148 more followers than previous quarter)
Facebook	1,400 (87 more followers than previous quarter)
LinkedIn	3,928 followers (127 more followers than previous quarter)

The 20-21 Business Plan target is to increase the reach of social media by 10%, which is currently not being met as in Q1 impressions totalled 308,905 average monthly impressions. This marks a 23% decrease. The GLAA currently sees 148,790 average monthly impressions through Facebook, 138,267 through Twitter and 21,849 through Linked In.

Business Change

The GLAA's Strategy team were involved in 7 engagements with partner agencies and stakeholders from various sectors of law enforcement and the labour market this quarter¹. Notable engagements this quarter involved training UK Border Agency front line officers in identifying the indicators of labour exploitation and modern slavery.

	No of Engagements (Business Change)	No of Engagements (Syndicate staff)	Reach (approx.)
April - 19	6	2	32
May - 19	1	2	102
June - 19	0	6	1,893
TOTAL		17	2,027

Freedom of Information (FOI) requests

In Q1, the GLAA received 5 requests under the FOI Act (53 requests in 2019-20). Of these, 2 responses were provided within the stipulated 20 day period, 1 response was provided outside of 20 days, 1 response is ongoing, and 1 request was withdrawn.

3 complaints have been received this quarter, 2 of which were completed and responded within 20 working days and both related to a late licence renewal, and 1 complaint is ongoing.

1 parliamentary question was received in Q1, which is published on the GLAA website.

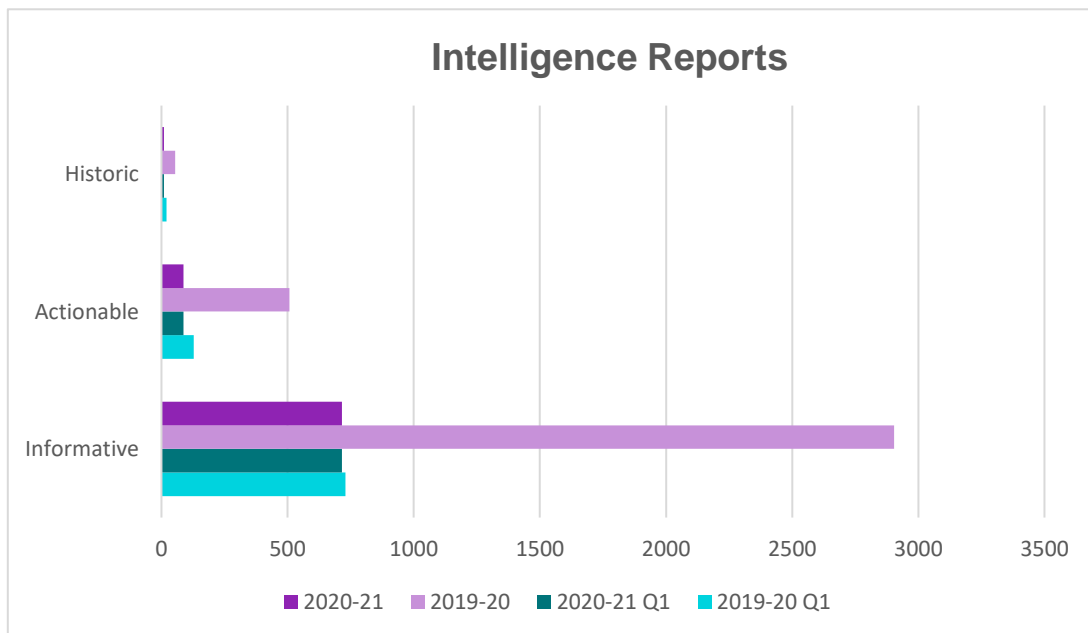
¹ Data is derived from multiple platforms and it is possible that a large number of engagement activities are unreported, particularly those that feature during normal investigative duties. This data should not be relied on as an exact figure, rather should be used as a guide only.

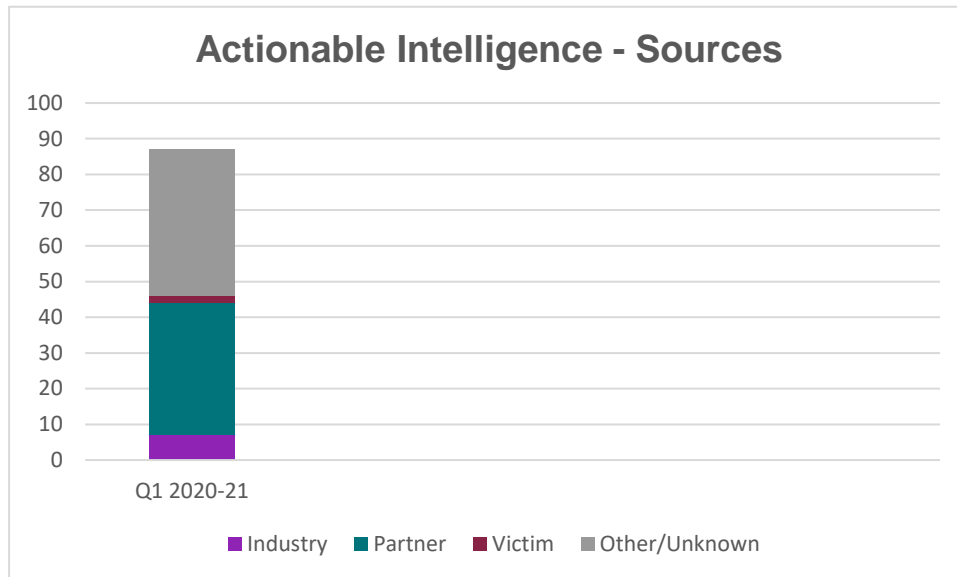
Protect

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 in Q1 is below the amount recorded in Q1 of 2019-20, a reduction of 7%.

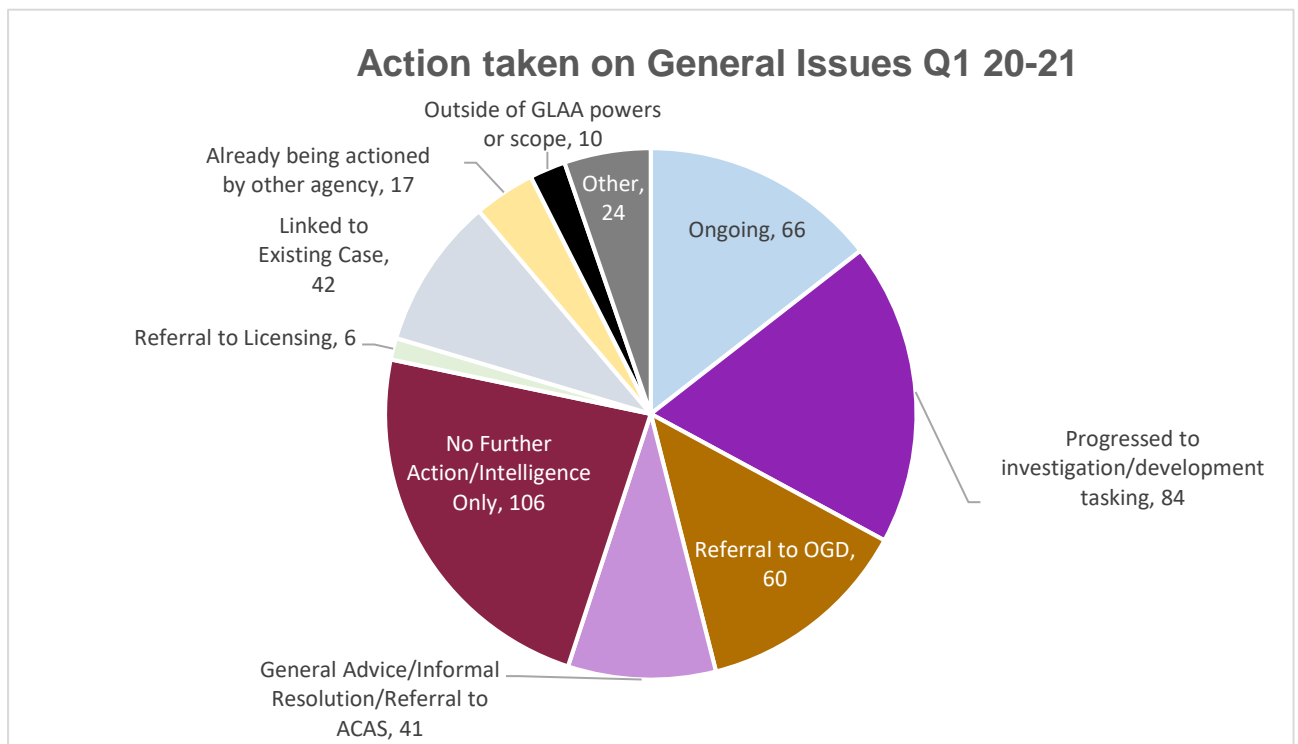
	Q1 2019-20		Q4 2019-20		Q1 2020-21	
Intelligence Reports created	877		814		812	
GLAA Sector?	Yes	No	Yes	No	Yes	No
	235	642	321	493	429	383
Modern Slavery Indicators	Yes	No	Yes	No	Yes	No
	41	836	65	749	38	774





General Issues (referrals)

The number of referrals made to the GLAA regarding potential labour exploitation and modern slavery offences has increased year on year since the GLAA obtained new powers in relation to the wider labour market in 2017. This however has decreased somewhat in Q1 compared to previous quarters, which appears to be a direct result of UK lockdown measures following the outbreak of covid-19 which has involved many businesses and premises temporarily closing, therefore reducing in some instances the identification and reporting of labour exploitation.



	Q1 20-21 Total	2019-20 quarterly average	Change
Created	456	685	33% ↓

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 the previous financial year less practicable.

Identification and support of victims

	2019-20 Total	Q1 2020- 21 Total	% change from quarterly average
Potential victims of labour exploitation/licensing breaches identified	15,186	2,167	43% ↓
Number of NRM Referrals made by the GLAA	7 (plus 23 assists)	1 (plus 1 assist)	33% ↓
Number of MS1 forms submitted by the GLAA	55 (plus 20 assists)	75 (all GLAA)	300% ↑

It is important to note that the GLAA records 'potential victims', and it may be the case that an investigation finds the worker not to have been a victim as first presumed. In order to identify the true number of victims of modern slavery, only those resulting in an NRM or MS1 should be referred to, as it is expected that all confirmed victims of modern slavery will result in either of these.

% of potential victims of modern slavery or human trafficking identified that result in an NRM or MS1. – Q1 2020-21			
Potential victims of MSHT identified	NRMs made	MS1 forms submitted	% resulting in NRM or MS1
426	1 (plus 1 assist)	75 (all GLAA)	18.1%

The sectors in which victims were most commonly identified as part of enforcement activity in Q1 was in the agriculture sector, followed by shellfish gathering and food processing and packaging.

Tier 1 intervention

The 2020-21 Business Plan target is to increase the amount of withheld wages and holiday pay recovered for workers, based on the 2018-19 totals of 72 resolutions relating to 110 workers by 30%. This has been used as a baseline due to 2 unique resolutions in 2019-20 in which upwards of £100,000 was recovered for over 600 workers.

Tier 1 Resolutions	Tier 1 Resolutions
2019-20	Q1 2020-21
39 resolutions (26 intelligence team, 13 enforcement/compliance teams)	7 resolutions (2 in intel, 5 in enforcement/compliance)
2,374 workers affected	622 workers affected
Withheld wages = £2,298.49	Withheld wages = £912.72
Holiday pay = £92,329.51	Holiday pay = £2,789.95
Both = £46,492.03	Both = £0
A further £25,485.27 relates to other recoveries, such as refunded PPE payments, and non-regulated sector recoveries such as unpaid overtime.	A further £510.27 relates to other recoveries, made in the wider labour market, not relating to GLAA licensed labour providers and therefore not involving a breached licensing standard.

Resolutions which occur for workers working outside of GLAA-regulated sectors, but with GLAA-licensed agencies, are included in these figures. Overall, in 2018-19, £94,769.49 was recovered, £166,605.30 was recovered in 2019-20, and £4,212.94 has been recovered in Q1 of 2020-21.

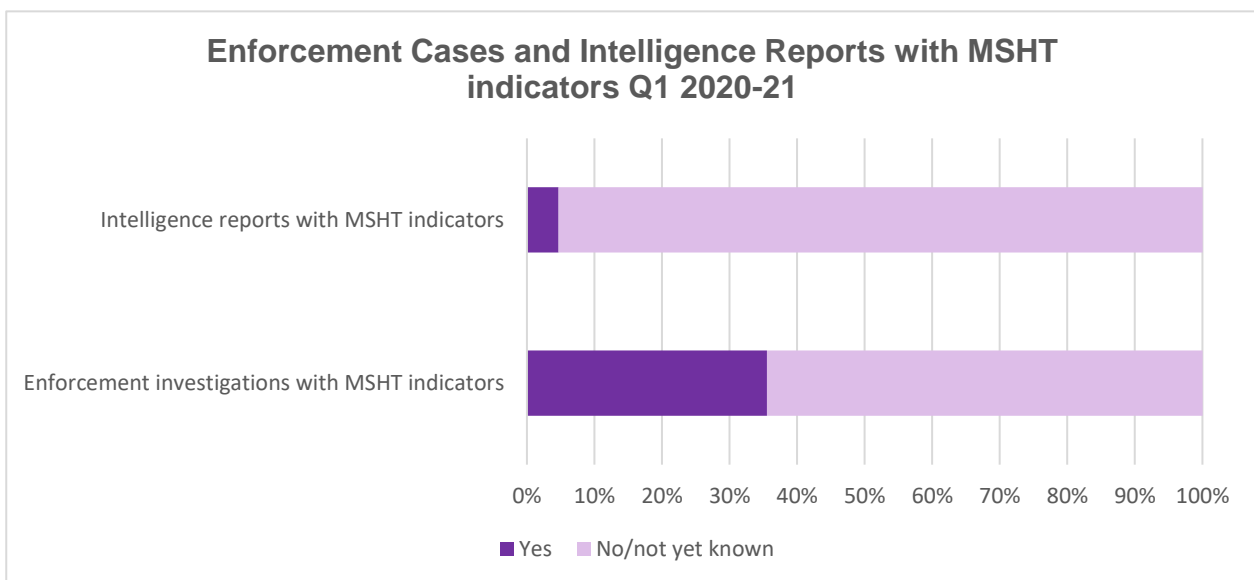
Pursue

Enforcement operations

	2019-20	Q1 2020-21	% quarterly average change from 2019-20
Enforcement cases tasked	268	45	33% ↓
Non-standard operations (NSO)	82	15	27% ↓

Following on from a large increase in enforcement cases in 2018-19 compared to the previous year, the total amount of cases of this nature levelled out somewhat in 2019-20, with just an 8.5% increase when compared to 2018-19. As mentioned previously, the implementation of lockdown measures across the UK following the outbreak of covid-19 has had an impact on the number of investigations tasked in Q1. In particular, this has led to the postponement of lesser priority days of action such as visits to restaurants, nail bars and car washes which ceased trading during the lockdown period, but may re-commence when lockdown measures are eased.

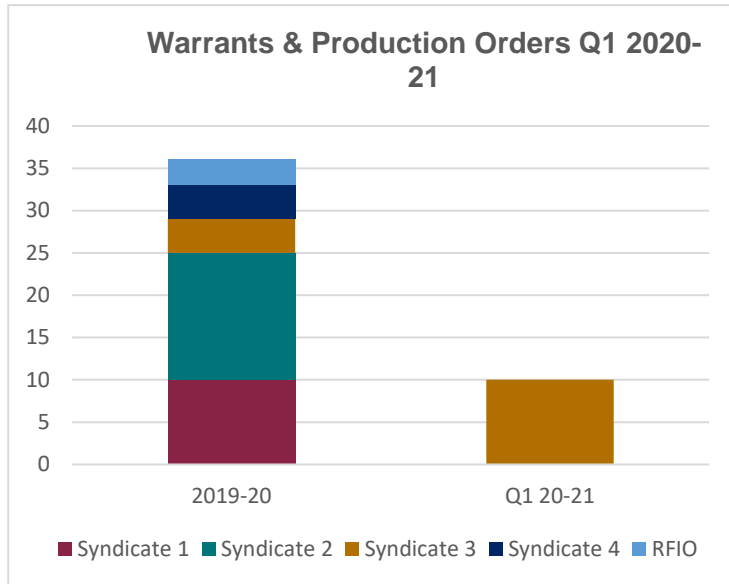
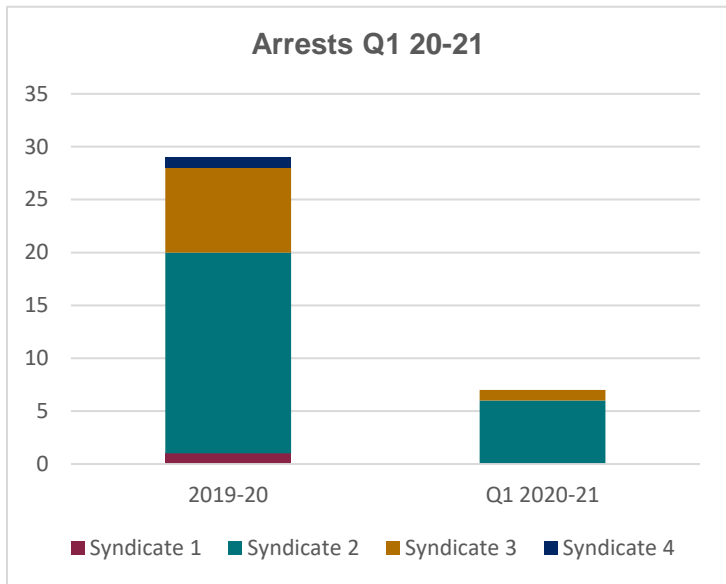
36% (16) of the enforcement cases tasked in Q1 of 2020-21 had indicators of modern slavery/human trafficking.



It is interesting to note that 95% (774) of intelligence reports recorded in Q1 had no indicators of modern slavery or human trafficking at the time of receipt, which could indicate that these factors may not have become apparent or be identified until further development or corroboration takes place. It is also possible that the indicators may not become apparent until an investigation commences. It is important to recognise that the

GLAA receives large quantities of intelligence from partner agencies which do not relate to labour market offences, and instead consists of address, employment and vehicle details linked to subjects, and are often historic or informative, with no explicit indicators of modern slavery.

Arrests and Warrants



The above graphs include arrests made by the GLAA, or by partner agencies in investigations supported by the GLAA. Just 1 arrest was made by the GLAA in Q1 of 2020-21 which is in part due to the outbreak of covid-19 which has delayed the arrest phase of some investigations. 6 arrests were made by a partner agency of which the GLAA supported, all of which related to potential modern slavery and human trafficking offences. It is also commonplace that suspects may wish to be voluntarily interviewed under caution, negating the need for an arrest. This occurred with a further 2 persons in Q1, both of whom were linked to investigations in the north-east syndicate.

The impact of covid-19 has meant that trial dates which were due to take place in Q1, relating to charges under both the Modern Slavery Act (2015) and Gangmasters Licensing Act (2004), have been delayed into later months in the year.

Closed investigations

	Q1 2020-21 Enforcement case closures				
	Syndicate 1	Syndicate 2	Syndicate 3	Syndicate 4	Total
Convictions	0	0	0	0	0
Warnings	0	0	0	0	0
Enforcement Notices	0	0	2	0	2
LMEU	1	0	0	0	1
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