



# Gangmasters & Labour Abuse Authority

## Minutes

**Title of meeting** GLAA 70th Board meeting  
**Date** 2 September 2020 **Time**  
**Venue** Skype/Zoom  
**Chair** Margaret Beels **Secretary** Jennifer Clarke

**Attendees**  
Margaret Beels (MB)  
Simon Allbutt (SA)  
William Butler (BB)  
Linda Dickens (LD)  
Suzanne McCarthy (SM)  
Julia Mulligan (JM)  
Paul Williams (PW)

**Ex officio attendee**

Ziggy MacDonald (ZM) Chief Executive (interim)

**In attendance**

Emma Coxon (EC) Head of People & Change  
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  
Jane Walker (JW) Risk & Information Assurance Manager/DPO  
Ian Waterfield (IW) Head of Enforcement

**Observer**

Miriam Minty (MM) Home Office

**Apologies** Paul Coffey

1	<p><b>Welcome</b></p> <ul style="list-style-type: none"><li>• The Chair welcomed members of the Board, Leadership Team and Home Office to the meeting.</li><li>• This meeting was an extra meeting slotted in to allow the Board to be updated on operation and policy matters given the gap between the 22 July meeting and the 4 November meeting.</li><li>• It was agreed that the agenda would focus on these key items and routine business would be carried forward to the next regular meeting.</li></ul>
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2	<p><b>Declarations of Interest</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>
3	<p><b>Declarations of Urgent Business</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>
4	<p><b>Chief Executive update</b></p> <ul style="list-style-type: none"> <li>• ZM updated the Board on the follow up for project areas that formed the core of his secondment activity.</li> </ul> <p><b>Compliance</b></p> <ul style="list-style-type: none"> <li>• There is some</li> <li>• GLAA data shows that almost two-thirds of inspections are on application</li> <li>• A more effective use of compliance capacity would be to move away from inspection on application towards inspection on renewal. The options would be around intelligence-led, random-selection or 100% coverage at renewal.</li> <li>• These options plus actions agreed at 28 April Compliance Deep Dive will inform the new Compliance Strategy.</li> <li>• Sessions with key partners on the emerging Compliance Strategy is being scheduled.</li> <li>• Formal proposals and the draft Compliance Strategy will be presented at the November Board meeting.</li> <li>• SM will be working with the executive in developing the Compliance proposals.</li> </ul> <p><b>Licence Fees</b></p> <ul style="list-style-type: none"> <li>• Discussions are taking place about fees and the potential impact/changes to our costing model.</li> <li>• The highest volume of GLAA activity is Band D renewals (turnover &lt;£1m); this is where the fee is lowest.</li> <li>• Moving to an inspection on renewal provides an opportunity to cover costs with a renewal inspection fee.</li> <li>• ZM discussed other payment models used by other regulators e.g. moving to an inspection on renewal and the “polluter” payment model.</li> <li>• MB added that it would be beneficial in the context of the Single Enforcement Body (SEB) to have a clear understanding of the costs of licensing and inspections.</li> <li>• Positive fee structure – PW recommended that a punitive inspection approach should be kept on the table.</li> </ul> <p><b>IT Strategy</b></p> <ul style="list-style-type: none"> <li>• Currently essential performance and operational data are held in three separate systems (GLASS/LAWs, Crimson &amp; iBase) which have no automated interconnection.</li> <li>• This is recognised as a risk, with an excessive amount of duplication or re-keying of information and manual transfers between systems.</li> <li>• To de-risk the current arrangements the GLAA has formally initiated a new project with the Home Office and Capgemini, which is now in the “Pre Discovery” phase</li> <li>• The intention to use external resources to uplift the GLASS functionality provide interconnection between the three systems. There is no in-house capability</li> <li>• NR confirmed that re tendering will be required at the Discovery stage.</li> </ul> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>1. Paper to November Board setting out the formal consultation process – Compliance. <b>NR/ZM.</b></li> </ol>

5	<p><b>Spending Review update</b></p> <ul style="list-style-type: none"> <li>• The Board noted the paper which asked them to review the GLAA draft response to the Spending Review (SR) and to consider the GLAA proposed approach to prioritisation of its resources against the SR scenarios. The response included bids for growth and impact on existing activity levels and performance against these scenarios. It reserved the position of the Board which would be confirmed in a follow-up letter</li> <li>• Discussion took place around the draft response which identified additional points that might be made.</li> <li>• The submission of a letter to HO will give the GLAA the opportunity to include those salient points discussed including, textile issues in Leicester, temporary licensing and the manifesto commitment to SEB.</li> </ul> <p><b>Action</b></p> <p>2. ZM to write to the Home Office sponsor unit prior to the Senior Sponsorship meeting on 15.09.20 to confirm the Board's discussion. <b>ZM</b></p>
6	<p><b>COVID-19</b></p> <p><b>a) GLAA ongoing response</b></p> <ul style="list-style-type: none"> <li>• IW gave a Gold update.</li> <li>• Operational activity is now returning to a normal level and the demand is now growing.</li> <li>• Good progress has been made in clearing backlogs caused by the significant resource issues in Intelligence.</li> <li>• Apex Court has re-opened and is available for ad hoc attendance for a maximum of 14 people.</li> <li>• The development of the new working model for GLAA is in progress which is building in the learning from the COVID-19 working arrangements.</li> </ul>
	<p><b>b) Impact on Resources</b></p> <ul style="list-style-type: none"> <li>• Some of our partner agencies have not returned to operational activities although HMRC/NMW were engaged in joint working with the GLAA last week.</li> <li>• There are still gaps in Intelligence received for the lockdown period in the areas considered to be high risk and the anticipated displacement of workers has not been evident.</li> <li>• The pressure on the Criminal Justice systems are causing delays with cases being put back from 9 months – 12 months which is impacting on outcomes.</li> <li>• An added issue for the GLAA is when victims and witnesses are not resident in the UK.</li> </ul>

### **c) Impact on Licensing and Compliance**

#### **Licensing**

- NR updated the Board.
- The Temporary licensing scheme moved quickly and was delivered at pace.
- Licence applications are increasing.
- An IT issue with emails has had an impact on renewals because licence holders have not received reminders. This was possibly due to the HO security changes.
- The Licensing team have been able to access calls to the office number whilst homeworking using BT connect and Skype.
- There has been an increase in email traffic into Licensing and operational colleagues from other areas of GLAA have assisted in answering them.
- Due to the under resourcing of the team decisions are now taking longer.
- Appeals – restrictions at the court end mean that GLAA submissions can't be submitted electronically. Hearings were postponed due to the COVID-19 pandemic but they are now being rescheduled.

#### **Compliance**

- Application inspections are being carried out virtually/by phone which is resulting in a quicker turnaround.
- The backlog in Compliance inspections is cleared and face to face work scheduled and completed.
- Activity in the forthcoming Operation Aidant will include looking at Ceased Trading, visits to labour uses sites and supporting enforcement activity. To raise awareness of this activity the GLAA has contacted all Chambers of Commerce across the UK.

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### **Leicester Task Force**

- The Task force is one of 5 initiatives instigated by the Home Secretary with oversight from the Permanent Secretary and Home Office DGs.
- GLAA volunteered to lead the tactical taskforce with DS having Gold and IW having Silver command.
- It is acknowledged that there are anecdotal concerns stretching back over a long period of time in the Leicester textile industry.
- Within the first few weeks the focus has been on engagement with visits to factories working with other government agencies and Leicestershire Police.
- GLAA investigation have led to the discovery of unsafe working conditions and non-payment of NMW but not the scale of modern slavery reported in the media.
- Minor Health & Safety issues and immigration overstayers have been discovered as well as good practice in factories to which they have been admitted
- Due to the lack of warrants there is no forced power of entry although work is in progress gathering sufficient intelligence to obtain warrants.
- There are 45 ongoing investigations, HMRC have identified 44 visits they wish to carry out.
- Leicester City Council have been supportive in terms of community engagement, but it remains a challenge.
- The issues
  - Data Sharing - Risk Appetite of partners
  - Pace of partnership working – (outside law enforcement) – tensions in the communities we are trying to get into.
  - Resourcing- bandwidth of those involved
  - Gap in powers - experience on the ground
  - Progress on 4 other initiatives outside of Taskforce Action
- Opportunities arising out of the Leicester Task Force: -  
The streamlined approach to this project has provided several opportunities including joining up intelligence and operational functions, business engagement in the sector (e.g. Boohoo) and contributing to the SEB design in ambition and scale.
- ZM commented on the importance of managing ministerial expectations.

8	<p><b>Single Enforcement Body</b></p> <ul style="list-style-type: none"> <li>• The first internal Programme Board has been held. It was noted that Julia Mulligan will be an observer at future meetings.</li> <li>• The GLAA is awaiting progress re BEIS overarching Programme Board, there are regular meeting with BEIs prior to the establishment of this board.</li> <li>• DD has attended four operational team’s meetings to raise awareness of the SEB with colleagues. All GLAA colleagues will be briefed.</li> <li>• DD is attending regular monthly meeting with his NMW counterpart.</li> <li>• MB requested that the Board be made aware promptly of the Government response to the SEB consultation expected in September/October.</li> <li>• Discussion took place regarding the nature of the SEB, no decision has been made on if it will be an Executive Agency or an ALB.</li> <li>• The live learning arising from the Leicester project is being captured and led by Sophie George, BEIS. This is a good joint working, co-owned opportunity for the GLAA &amp; BEIS to test potential elements for the SEB.</li> <li>• GLAA liaison with BEIS suggests they are still at quite an early stage in their thinking, awaiting input from ministers.</li> <li>• Leicester task force could act as a pilot to enable quicker testing of a different approach on entry powers – the lack of access due to reliance on consent supports proposals that have already been raised with HO officials.</li> <li>• Some supporting work – e.g. intelligence processes – could require resource investment – which the GLAA needs to identify and propose.</li> <li>• The GLAA needs to continue to work with ODLME and IASC.</li> <li>• Work is in train re SEB arrangements and Devolved Authorities.</li> </ul> <p><b>Action</b></p> <p>3. Inform the Board of the Government response to the SEB Consultation. <b>DD</b></p>
9	<p><b>Joint working with EU investigation/enforcement colleagues after 1 January 2021</b></p> <ul style="list-style-type: none"> <li>• DD gave an overview of the Brexit impact on workers</li> <li>• Workers who have been in the UK for 5 years can claim settlement</li> <li>• The Brexit transitional period ends on 31 December 2020.</li> <li>• Workers who arrive before December 2020, can claim pre-settlement status, and earn settlement</li> <li>• No changes to the rights of EU migrant workers prior to 30 June 2021.</li> <li>• Pre-settlement must be claimed before 30 June 2021.</li> <li>• Clarification of third country status &amp; UK engagement with Europol/ELA/individual labour inspectorates</li> <li>• Migrant workers recruited before the 2020 deadline, by individuals or agencies in the source country, may have been exploited. Exploitation may not come to light for several years as was witnessed in Op. Fort. This demonstrated the need to keep channels open with relevant authorities overseas.</li> <li>• There is a need for continuing liaison to support evidence of offences or compliance with domestic labour law.</li> <li>• Discussion took place around the Worker Rights trade agreements which forms the basis of some of the GLAA Standards.</li> </ul>
10	<p><b>Recruitment of the CEO</b></p> <ul style="list-style-type: none"> <li>• Closed session attended by Board members only.</li> </ul>
11	<p><b>Close</b></p>
12	<p>Date of next meeting 4 November 2020</p>