

Strategic Plan 2020-23 and Business Plan 2020-21

22 October 2020

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Chair and Chief Executive's foreword



Our vision is to position the Gangmasters and Labour Abuse Authority (GLAA) as a world class organisation in the fight to tackle labour exploitation and to drive a decline in its prevalence within the UK labour market by 2025. Our mission is both challenging and complex. Labour exploitation and modern slavery have been identified as a national threat as well as an international problem and the harm caused is significant.

Despite being a small independent regulator with a specialist law enforcement capability we work collaboratively through our UK-wide licensing remit and our expanded enforcement powers in England and Wales to combat the exploitation of vulnerable workers and tackle labour market offences, including forced labour, in the United Kingdom. We engage with all industries UK-wide to drive awareness of modern slavery indicators and influence increased due diligence in supply chains to prevent exploitation occurring. We continue to support legitimate businesses but remain the enemy of illegitimate practices.

We use an approach centered around the three priorities to: **Prevent** labour exploitation; **Protect** vulnerable and exploited workers; and **Pursue** criminals who prey on their workers.

The GLAA's own assessment of the wider UK labour market has identified a number of high-risk sectors employing some 10 million workers (GLAA Strategic Assessment 2018-19). We are committed to using our intelligence-led approach to ensure our flexible response focuses on areas of greatest threat and harm to the workers we exist to protect.

During the period of this Strategic Plan further change in labour market regulation is expected in response to the Government's manifesto commitment to create a Single Enforcement Body (SEB), following its 2019 public consultation. The details of the nature and scope of the body are yet to emerge, but they will impact the GLAA's role. The latter half of the second year, and the third year of this plan, could therefore see significant transformational activity which will impact on priorities, activities and outcomes.

We believe that the creation of a SEB is an opportunity for the UK to further enhance protections to workers and to identify and prosecute exploiters. We believe that the GLAA will play a pivotal role in any changes in labour market enforcement, cracking down on any employer abusing employment law. Whilst this may present complex transformational changes, we will ensure that the delivery of the GLAA's core mission is maintained.

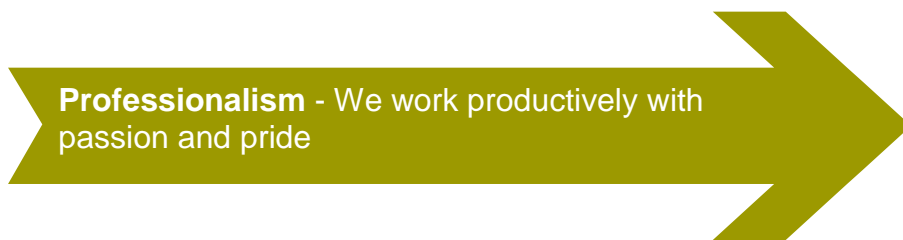
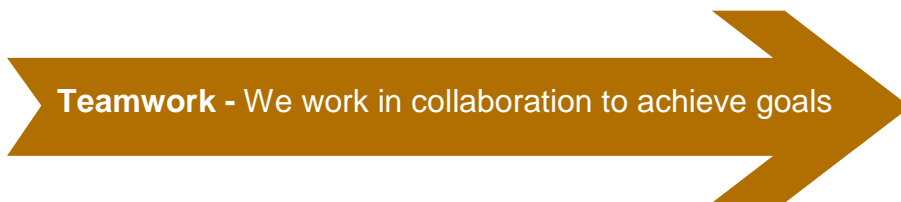
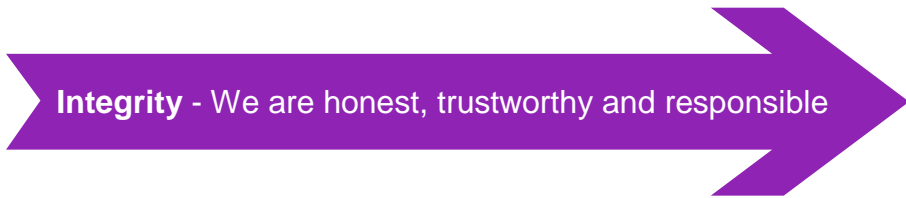
The GLAA was anticipating that, as the country moves into a post-Brexit world, there would be new challenges in terms of delivering its mission. Layered on top of that now is the effect of the Covid-19 pandemic with the consequential impact on the UK economy and the labour market. The combined impact of these issues on the GLAA's performance in 2020-21 cannot be estimated at this time but is potentially significant. The scope for the exploitation of workers may increase.

In the immediate period of the lockdown the GLAA transformed the way it worked, to maintain all its services, continued to deliver a frontline operational response, and found ways to ease licensing pressures on the food supply chain whilst not introducing new risks for workers. The GLAA will work to maintain its core services during the lockdown phase and deliver what it can during any period of controls that continue to apply as we move out of lockdown. This flexible response will continue in the current year as we work towards a return to our normal operational approach, to protect workers and legitimate business.

The GLAA will reflect its performance in reports to the Board throughout the year, and in the Annual Report and Accounts for 2020-21. With the Board's oversight and agreement, targets within the year may change where ongoing issues affect our ability to meet those targets set in this year's Business Plan.

GLAA values

GLAA colleagues, working together, have developed a set of values to which every Board member and every GLAA employee aspires. The GLAA holds itself to account against these values both as regards how colleagues work with each other and in all our interactions with external organisations and individuals.



Introduction

This year we have brought together our strategic three-year plan and the business plan for 2020-2021 into a single document to provide greater clarity on what we plan to do, when, how our aspirations and actions link together, and how our progress and performance can be reported. Part 1 covers the strategic plan for three years; Part 2 is the business Plan for this year; and Part 3 sets out our performance measures for the coming year.

The GLAA's reputation as a world class organisation in tackling and preventing labour exploitation, through licensing, enforcement, and our prevention activity, is one we are determined to grow. However, we recognise that an ever changing labour market and changes to business practices require us to adapt to meet those challenges, to strive to maintain our effectiveness in tackling and preventing exploitation, and to work with and earn the trust and confidence of those being exploited.

Confidence in the GLAA will be maintained and grow from:

- being, and acknowledged as being, expert in preventing and tackling labour exploitation,
- being successful at safeguarding vulnerable people and putting victims first,
- ensuring the vulnerable and victims receive the best possible outcomes and support they need from our partners, and
- bringing offenders to justice.

In doing so we will uphold the very best traditions of public servants committed to helping others, and to aspire to be recognised as a “best in class” national regulator.

This document sets out our strategic and business plans over the period 2020-2023. In the following pages we explain the major challenge for the organisation, in relation to the potential impact of the Government's commitment to the establishment of a SEB; external influences on our planned activities; and the changing operating landscape that we exist in.

We then set out our long-term plans (the strategic plan), our planned activities for the coming year (the business plan), and our performance targets for 2020-21 under each of the GLAA's six objectives, which are to:

1. Identify and support victims of labour exploitation
2. Maintain a credible licensing scheme, creating a level playing field and promoting compliant business growth
3. Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation
4. Disrupt and deter criminal activity within the labour market
5. Develop our people and culture in line with the Authority's values, ensuring a diverse, resilient and change ready organisation
6. Provide efficient and effective services, sound governance, robust risk management and value for money

About the GLAA's Strategic and Business Plans

The purpose of the Strategic Plan is to set the direction for the GLAA identifying planned activity to improve the effectiveness of the organisation and its contribution to the UK effort to prevent and detect labour exploitation. It builds on the 2019-2022 GLAA strategy approved by the Home Office in 2019 and is supported by the key activities we intend to deliver in 2020-21 as set out in the business plan.

The strategy and business plans for the period 2020-2023 present a clear framework which the GLAA will use to:

- continually improve across all aspects of performance,
- enhance public and stakeholder confidence,
- most importantly, work in partnership to protect vulnerable and exploited workers,
- work collaboratively across Government to ensure a flexible response to future changes to labour market regulation, and
- improve the prevention and investigation of exploitation.



Each year the GLAA revises and produces its strategic plan covering a three-year period. It also produces a more detailed business plan annually, focusing on the activities planned, and its performance measures for the first year covered by the related strategic plan. This document combines both plans to create a coherent approach to our forward planning.

The strategic plan and the business plan reflect the current key risks and challenges for the operational environment in which the GLAA operates, and which we set out in our annual Strategic Assessment that guides our priorities.

Our approach also takes account of the assessments by other statutory bodies, and partners. These include:

- recommendations for the GLAA in the Director of Labour Market Enforcement's annual strategy, as accepted by Government,
- the Independent Anti-Slavery Commissioner's strategic plans,
- the National Crime Agency's annual National Strategic Assessment of Serious and Organised Crime,
- major structural changes affecting the labour market, such as the settled status scheme, the termination of free movement for EU workers, new arrangements to permit foreign workers to come to the UK and other

- immigration law changes,
- labour law changes arising from the Government's response to the Good Work Plan,
- the delivery of the Government's manifesto commitment to the establishment of a SEB for the labour market, and
- global best practice in the investigation and prevention of labour exploitation, developed by international partners.

These assessments and other priorities will be affected by the impact of the Covid-19 pandemic, not only on the UK economy, but also worldwide.

Operating landscape

The GLAA's own assessment of the wider UK labour market has identified a number of high-risk sectors employing some 10 million workers (GLAA Strategic Assessment 2018-19).



Our assessment is that our effectiveness to tackle identified exploitation cannot succeed by enforcement alone. Prevention, encouraging industries to take an active part, and raising public awareness are crucial to our long-term success. We are encouraged by the proactive approach that we are seeing in the construction sector, and which individual businesses can report in their annual "Transparency in Supply Chain" statements.

Informed by the GLAA's continuous intelligence assessments, which provide a dynamic picture of high risks of exploitation, whether by industry or geographical area, the GLAA will select the most appropriate response to tackle and prevent exploitation. This has been our focus, and which has led to the work we have done with construction, textiles, and car wash sectors, and which we expect to expand through our work with the hotels and hospitality sector, and analysis of issues in the nail bar industry.

Measuring our impact

During the year we will further increase our capability, utilising the increased data held, to provide analysis that assesses performance against the following measures of a successful GLAA, to assess whether:

The GLAA has developed a comprehensive understanding of the scale and threat of labour exploitation in the UK

The GLAA's response to the identified threats of labour exploitation and modern slavery is effective and identifies and supports victims

The GLAA has an effective approach to working with partners to tackle labour exploitation and modern slavery

The GLAA has demonstrated its ability to work with businesses, labour users and providers to drive up standards, preventing and tackling labour exploitation and modern slavery

The GLAA ensures robust governance and effective use of its budget to deliver its services

Our risk tolerance

Our risk tolerance will continue to be determined by our intelligence analysis. This sets out our operational priorities based on our understanding of labour exploitation and assessment of resulting risk or harm. In developing our analysis of how to tackle the problem we will use an appropriate and proportionate approach to reduce and prevent victimisation, prioritising high risk cases to ensure effective use of GLAA resources.

Resources

Each year the GLAA develops a budget and medium term forecast which places its available resource against the risks the organisation faces and to support the delivery of its strategic objectives. Resources are a key constraint on what the GLAA can deliver.

For example, the GLAA believes that licensing is an effective tool in preventing labour exploitation and that a case can be made to extend the scope of the licensing regime to other sectors where there are demonstrable benefits to doing so, with an appropriate resource to do so.

We will seek funding to support new activities that enable the GLAA to deliver its objectives and increase its impact through working in partnership.

Budget

The GLAA has funding of £7.1m to support its operational activities as a result of funding allocated by its sponsor department the Home Office.

The GLAA generates income of £1.1m predominately from fees for licensing activity from new applications and licence renewals.

GLAA funding has remained static since 2019-20 and so the GLAA faced a real term cut in funding of £500,000 in 2020-21. Funding is likely to be a key constraint on the GLAA's ability to deliver this strategic plan and plans will be reviewed based on the funding it receives.

We currently anticipate that funding for 2021-22 will cover inflationary increases and we intend to bid for funding to enable new additional activities that support this strategic plan. Given the uncertainty over future funding the we will also prepare plans for funding to remain static and for cuts of up to 5%.



Creation of a Single Enforcement Body



In 2019 Government undertook a public consultation on whether a SEB should be created, which featured in the Government's subsequent manifesto commitments.

The GLAA welcomed this proposal and considered that it could:

- ensure that the UK remains at the forefront internationally in eliminating labour exploitation,
- provide a consistent approach to protecting workers, and
- enable a more robust, strategic intelligence-led activity, with an opportunity to close enforcement gaps.

The GLAA also considers that:

- the SEB should operate consistently in all jurisdictions; and that
- in advance of its creation and to ensure a successful transition, a shadow organisation should be set up to deliver short and medium-term gains.

The GLAA recognises that implementation of a SEB is likely to take time. During the currency of this plan it is expected that the development of the SEB will influence changes in priorities and planned activities.

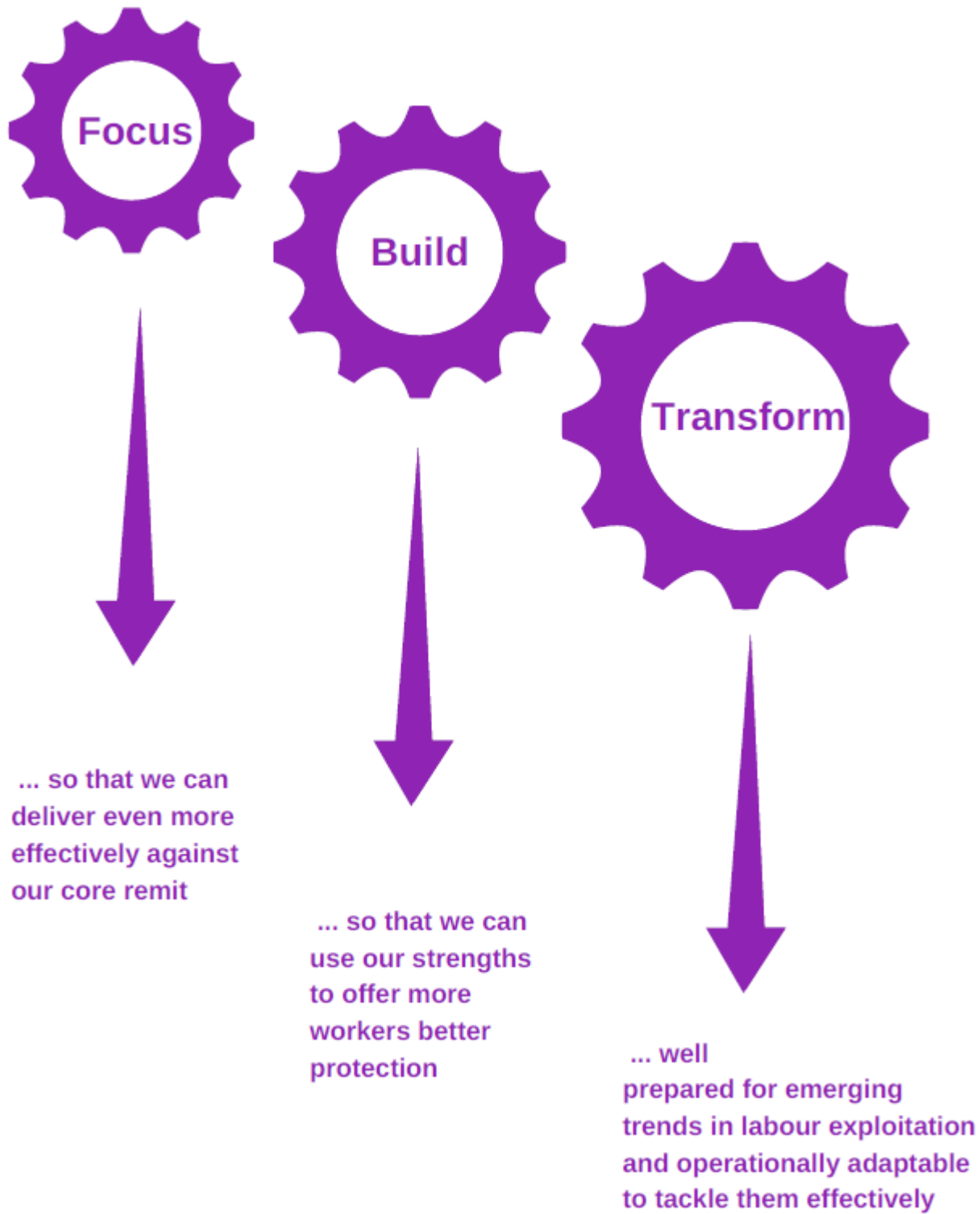
Despite changes that may be made to the strategic plan as a result of the SEB development we expect the core principle of protecting workers will remain at the heart of the mission of any new organisation. Consequently, we expect that our future activities should also be consistent with the plans and structures of the SEB.

In considering the future, and the potential for the establishment of a SEB the GLAA's financial plans will identify the resources required to prepare the regulatory landscape for this. The extent to which the GLAA can support any shadow functions required prior to the creation of the SEB will be subject to appropriate funding.

Our mission: Working in partnership to protect vulnerable and exploited workers

Our vision: To be a world class organisation in the fight to tackle labour exploitation

The future at a glance



Part 1: Strategic Plan 2020 - 2023

Our Strategic Objectives

1. Identify and support victims of labour exploitation

Our mission is to protect vulnerable workers from being exploited. We aim to improve our capability to support the needs of victims

Success by 2023 will be:

Increased victim identification, and self-identification, to the GLAA, with workers confident and able to report the circumstances of their exploitation.

Demonstrable evidence of a correlation between the GLAA's communication output with increased awareness, education, referrals and identification of victims.

Victims increasingly cooperate with the GLAA's investigations, assured that they will be supported and not at risk of repeat exploitation.

Improved investigation outcomes that proportionately sanction offenders and increase protection for victims.

Better support for victims, reducing levels, and the risk, of repeat exploitation, and assisting their rehabilitation within the economy and for their wellbeing.

Successful restoration of withheld entitlements (e.g. holiday pay) to victims directly through GLAA action in cases of exploitation beneath the modern slavery reporting threshold.

Improved support for identified victims across broader sectors of the UK labour market, arising from increased effectiveness of the GLAA's penetration of new industry sectors.

Increased confidence of exploited workers to accept the GLAA's support to be referred into the NRM and assisting their willingness to support prosecution of their exploiters.

What we will do:

Work closely with victim support organisations to ensure that GLAA operations, and identified victims, receive immediate support.

As increased levels of victims and demand on GLAA resources are identified we will analyse outcomes to drive evidence-based improvements to victim support processes and infrastructure.

Use communication and engagement activity to amplify the work of the GLAA and increase awareness and understanding of labour exploitation across the UK.

Harness the valuable role of GLAA stakeholders in the identification of victims and promotion of worker rights, significantly increasing our reach among workers in high risk sectors.

Ensure that our victim centered approach is at the heart of any new organisation tasked with regulating the labour market and encouraging our enforcement partners to adopt a similar approach.

2. Maintain a credible licensing scheme, creating a level playing field and promoting compliant business growth

We are a proven, credible regulator with a strong reputation amongst licensed labour providers. Our aim is to shift to more proactive regulation, ensuring continued compliance with the licensing standards

Success by 2023 will be:

A regulatory approach that is proportionate and risk-based but is underpinned by inspection and robust decision-making.

A licensing regime that enjoys strong support from compliant businesses, balancing regulatory requirements with increased compliance and promoting a level playing field.

Licence holders with high levels of customer satisfaction as a result of effective and efficient service provision throughout the licensing process.

Increased protection for more workers by responding to the changing employment landscape and building on the success of the licensing system by extending protection to further high-risk sectors.

A licensing regime that is self-funding, underpinned by a model that can keep pace with changing costs and demands.

What we will do:

Develop a strategy for our approach to our regulatory work which sets out how the GLAA will ensure our compliance activity reflects good regulatory practice without placing an undue burden on business.

Undertake a review of the licensing standards within the period of this plan, recognising the potential for new sectors to be licensed with new standards, where this is seen to be appropriate, and incorporating such changes as may arise from new employment legislation.

Undertake a review of licence fees to ensure that fee levels are appropriate and are set at a level that properly supports the GLAA's operational activity, manages public money appropriately, and fosters compliant behaviors.

Implement process improvements in the licensing scheme that enhance effectiveness and customer service.

Take a risk based and proportionate approach to application inspections of compliant businesses, to reduce the regulatory burden and ensure a continuing focus on monitoring and inspecting our licence holders to robustly ensure they remain fit to hold a licence.

Develop and implement a new licensing IT system that is responsive to customer needs and enables the efficient management of the licensing scheme.

Provide a proportionate regulatory approach in sectors beyond the currently licensed sector.

3. Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation

We support compliant businesses but are the enemy of irregular working practices. Working in partnership is critical to achieving our aims. We intend to expand the GLAA's outreach to engage with a larger number and more diverse range of stakeholders

Success by 2023 will be:

Increased joint working with stakeholders to prevent exploitation occurring, expanding support to their innovative approaches that have been demonstrated to change behaviors and protect workers.

Demonstration that the GLAA's programme for the sharing of intelligence trend analysis has increased the awareness of emerging risks, enhancing the protection of workers from those risks, and the reporting of potential risks of labour exploitation.

Demonstrable changes in the behavior of industry stakeholder groups, greater engagement with the GLAA, and evidence of effective due diligence to prevent exploiters infiltrating supply chains.

Successfully operated and evaluated a framework for different stakeholder/industry groups that has delivered cross-sectoral best practice and learning, continued change and protection for workers.

Playing a key role in the development, operation and integration of a cross-Government prevention programme providing coordinated prevention support for business and victims.

What we will do:

Led by the GLAA's intelligence assessment of those industry sectors with the highest risks of exploitation, enhance preventative awareness within those high-risk sectors, working with key industry stakeholders, and explore different sector specific approaches to engaging with business and workers to raise awareness, educate and generate increased actionable intelligence.

Utilise the support of compliant business to develop self-regulatory and voluntary industry led schemes focusing on high risk sectors, building sustainable prevention approaches, including a standard approach to the content of prevention training by stakeholders, through encouraging industry leadership.

Increase the scope of preventative activity through longer term projects in partnership with faith groups, migrant communities, educational establishments, through third party financial industry pressures and continued international engagement as the global labour market changes.

Test the effectiveness of our engagement, using surveys and other appropriate methods, to assess what changes have been made by stakeholders, what support they need, and how the GLAA should address that need.

Develop a cross-Government enforcement group and programme, reflecting how non-compliance in the labour market impacts all industries, promoting an agenda that will also support the prevention priorities for a SEB.

Our Strategic Objectives

4. Disrupt and deter criminal activity within the labour market

We are specialists in the investigation of labour exploitation. We will pursue criminal exploitation of workers and maximise the effectiveness of GLAA led enforcement investigations, whilst maintaining our work in partnership with other enforcement bodies

Success by 2023 will be:

Increased speed and success of prosecutions through excellence in the quality of our investigation submissions to prosecuting authorities and improving the speed of charging decisions.

Effective and proportionate sentencing results from GLAA prosecutions for wider offences in England and Wales.

Delivering a common enforcement approach throughout the UK, to investigate forced labour offences.

Have improved compliance in the labour market through the appropriate and proportionate use of alternative sanctions.

Targeted enforcement that has disrupted the finance and other enablers of criminal exploitation, utilising financial investigation powers and other methods to increase the risk to offenders and reduce their profits.

What we will do:

Pursue relentlessly those who exploit workers using a range of civil and criminal powers, and orders¹, including financial investigation powers, available to us, whilst keeping the use of those powers under review and evaluating their relative impact and outcome.

Ensure a thorough understanding by prosecutors and Judges of the impact of exploitation on workers in cases presented, to secure proportionate and effective sentences.

Direct enforcement activity to maximise investigation outcomes and protection for vulnerable workers using intelligence assessments of high-risk activity, and hot spots geographically.

Maintain and expand the effectiveness and proportionate use of existing sanctions and develop options for improving the suite of enforcement and regulatory powers available. To include opportunities that may arise from the establishment of a SEB and continue to work with the devolved authorities to apply a consistent approach across the different UK legal jurisdictions.

Develop an effective methodology to capture the impact of GLAA disruption activity in circumstances where a formal sanction is not appropriate, including how the impact of other sanctions have a disruptive effect on labour exploitation.

Review the GLAA enforcement approach, and that of key partners, to examine opportunities for alignment to enhance multi-agency investigation and develop a prototype for a SEB operational model, focused on the right powers and right sanction in the right situations.

¹ Labour Market Enforcement Orders under sections 18 and 20 of the Immigration Act 2016, and Slavery and Trafficking Prevention Orders (sections 14, 15) and Slavery and Trafficking Risk Orders (section 23) OF THE Modern Slavery Act 2015

5. Develop our people and culture in line with the Authority's values, ensuring a diverse, resilient, respected and change ready organisation

Our intention is to enhance the skills and capabilities of our leaders, unlock the talent of all GLAA colleagues and empower them to progress their own development

Success by 2023 will be:

Being recognised as an employer of choice that invests in the development of its people.

Being seen as an effective and proportionate regulator, whose officers and contact with the public demonstrates the best of public service, and the delivery of the organisation's values, ensuring appropriate behaviours in the delivery of our objectives.

Increased employee engagement.

Progress towards a diversity profile reflective of society.

Succession planning that manages future recruitment to anticipated departures, across all functional areas of the GLAA.

A progressive, collaborative and healthy working environment (including exploring new ways of working and communicating, developed in response to Covid-19, enhancing the ability to deliver an effective contingency response in any circumstances) which is conducive and beneficial to all people throughout their career with the GLAA, which benefits the operation of the GLAA by improved retention and better service levels.

What we will do:

Further develop and implement a programme of cultural and organisational change, embedding our values in everything we do, which is shaped by our people, aligns with the changing role of the authority and prepares us for future demands, which is recognised positively by outside organisations and individuals.

Develop and implement an action plan to ensure policies and processes support and further equality and diversity.

Develop and embed workforce plans that provide the learning and development, recruitment and retention, and talent management measures needed to continue equipping our people.

Prepare and deliver actions for building up our talent pipeline for the future through an appropriate blend of trainee, graduate and apprenticeship schemes, working with partners to establish mutually beneficial approaches.

Benchmark key policies, and terms and conditions, against other enforcement bodies to provide a target business model for future harmonisation, and preparation for the creation of a SEB.

6. Provide efficient and effective services, sound governance, robust risk management and value for money

As a public body we have a responsibility to deliver a high quality, effective service, which demonstrates value for money. We will be bold and ambitious in our aims to protect vulnerable workers, whilst operating within a sound financial framework

Success by 2023 will be:

That the GLAA has a culture of continual improvement and realignment of resources to new threats and opportunities, in line with proactive risk management.

The GLAA can demonstrate the costs of all its activities and outcomes and show that it has improved its efficiency and effectiveness.

Delivery of appropriate technology to support operational and organisational objectives and efficiency and effectiveness of the organisation.

Operational and wider management responsibilities are aligned, including finance, risk and performance management with the leadership team assessing itself as to how effectively it is working.

The GLAA receives improved assurance from independent review on its governance.

Production of our Annual Report and Accounts in a timely manner that clearly demonstrates our use of taxpayer's money against delivery of our business plan objectives.

What we will do:

Cost the range of the GLAA's activities and outcomes so that the GLAA can ensure it uses its resources efficiently and effectively and to support building a business case for powers and resources required for a SEB.

Produce a savings plan that will address the £500,000 shortfall in funding (2020-21) and prepare plans for a range of funding scenarios for 2021-22 and beyond and how this will impact performance against the strategic plan.

Align operational and financial responsibilities to create a culture where value for money is central to decision making.

The GLAA will have appropriate governance structures and processes which have the confidence of key stakeholders.

Part 2: Business Plan 2020-2021

Delivery of our objectives during 2020-21

This section sets out what we plan to deliver in 2020-21 to enhance the role of the GLAA, its effectiveness, and the protection for workers it can provide.

Objective 1: Identify and support victims of labour exploitation

Our mission is to protect vulnerable workers from being exploited. We aim to enhance our capability around prioritising victims and be compliant with the Victims' Charter requirements.

Key Deliverables

- Strengthened relationships with wider victim services and law enforcement to ensure that victims are provided with a high standard of service, building the confidence of victims to engage with the GLAA, by maintaining national contact with Unseen, the Salvation Army, and other victim charities, and ensuring that our frontline officers build a network with their local victim support services.
- Identification of key business and third sector partners with whom we can work in partnership to rehabilitate and elevate exploited workers into a 21st century standard of living.
- Increased understanding of what victims require and improving what we do to deliver an effective victim centered approach. To do so by considering a de-briefing approach to victims as part of NRM referral. This will assist the development of analysis of why victims may not want to be supported to enter the NRM, to enable the GLAA to enhance the support to victims, and their confidence in that support.
- Wider public awareness and industry specific campaigns in conjunction with partner organisations, maximising the use of social media, in order to raise awareness of workers' rights, labour exploitation, increase victim identification, and how to report such situations.
- Develop increased identification of victims through supporting networks of existing frontline groups (such as NHS, local authorities, DWP etc.) in spotting the signs and providing relevant intelligence.

Objective 2: Maintain a credible licensing scheme, creating a level playing field, and promoting compliant business growth

We are a proven, credible regulator with a high reputation amongst licensed labour providers. Our aim is to shift to more proactive regulation, investing more in compliance and ensuring that GLAA Licensing delivers all aspects of this objective.

Key Deliverables

- Develop a Compliance Strategy by March 2021 which reflects good regulatory practice.
- Develop a new model for application, inspection and renewal fees by March 2021.
- Deliver any changes necessary to the licensing scheme arising from Government policy changes impacting the labour market, including recommendations from the Director of Labour Market Enforcement and potential improvements that may be suggested from customer feedback.
- Review our approach to compliance activities and make recommendation for change by Q3.
- Develop a new licensing system which meets the needs of users by March 2021.
- Provide information and guidance to our regulated sector so that they are clear on changes which may impact on the licensing scheme and can maintain compliance.

Objective 3: Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation

We are the enemy of illegitimate working practices, not compliant businesses. Working in partnership is critical to achieving our aims. We intend to expand the GLAA's outreach to engage with a larger number and more diverse range of stakeholders.

Key Deliverables

- Focus activity with partners in high risk sectors as defined by the GLAA's strategic assessment, to effectively enhance local and regional engagement improving prevention and due diligence.
- Develop a national standard package for training for any organisation involved in providing prevention training on forced labour, supporting a "train the trainers" approach for industry ethical auditors.
- Seek opportunities to test innovative approaches to engage with our stakeholders, ensuring visibility and maintaining business as usual, even during exceptional emergency contingency situations, including new use of video conferencing, webinars to support continuity for future potential GLAA-led conferences/regional "pop-up" events, to broaden awareness of trends and prevention with all stakeholder groups.
- work collaboratively with partners to reach workers, building on pilots such as the Crimestoppers/facebook initiative, working with financial industry, educational establishments, migrant community groups, faith leaders and their support groups, and academia to support the analysis and evaluation of the effectiveness of approaches undertaken.
- Create a partner forum for the prevention of labour exploitation bringing together the leads from key stakeholder-industry focused prevention (Protocol) groups, and other initiatives (e.g. car wash, nail bar industry stakeholders) to ensure key trends are understood and support industry to prevent new forms of exploitation.
- Develop a cross-Government forum of enforcement bodies operating in the labour market to establish opportunities for joint prevention activity to identify common threats for business.

Objective 4: Disrupt and deter criminal activity within the labour market

We are specialists in the prevention and investigation of labour exploitation. We will work to increase the number of GLAA-led enforcement investigations, whilst maintaining our work in partnership.

Key Deliverables

- To lead the cross-UK/EU Operation Aidant activity to intensify the effort of UK agencies to tackle and prevent labour exploitation.
- An annual strategic assessment of the nature and scale of labour exploitation to inform future planning and contribute to the activities of key partners, including the Director of Labour Market Enforcement's strategy.
- An annual demand analysis, reflecting the resource pressures from operations, used to review the sustainability of current triage and tasking models to inform the effective deployment of the GLAA's resources.
- To continue working with inspectorates and partners, evaluate our use of and compliance with, Labour Market Enforcement Undertakings and Orders, (sharing that analysis with BEIS, Home Office, and the Director of Labour Market Enforcement), and taking appropriate action to escalate or remove such sanctions and continuing to build credibility in their role within the enforcement community.
- Evaluate the effectiveness of the GLAA's current range of powers and orders to prevent labour exploitation, such as the wider PACE and Proceeds of Crime Act powers currently available, and review investigative outcomes, proposing what a SEB would require to enable the development of a consistent enforcement approach throughout the UK.

Objective 5: Develop our people and culture in line with the authority's values, ensuring a diverse, resilient and change ready organisation

Our people are our greatest asset and our intention is to enhance the skills and capabilities of our leaders, unlock the talent of all GLAA colleagues and empower them to progress their own development.

Key Deliverables

- Implement the programme of culture change and deliver against the agreed action plan milestones, working closely with teams and the Employee Representation Team to hold each other to account for progress achieved.
- Complete the implementation of recommendations from the review of health and safety, ensuring that policies and procedures are in place to protect our people, and develop new proposals to improve wider wellbeing through engagement with people across the organisation.
- Develop clear workforce plans covering all business areas that improve resilience, diversity and retention, and provide clear development routes for individuals and teams both within the organisation and with partners through secondments, exchanges and placements.
- Develop and implement a comprehensive and coherent set of HR policies and procedures to support all aspects of employee responsibilities, and advice, including equality, and diversity, and pay and reward.
- Undertake a lessons learnt review of the re-organisation, and its impact on resource planning and operational capability and continuity, and include a review of the Business Continuity plan, and organisational readiness based on our response to the Covid-19 emergency.
- Review progress of the pilot apprenticeships and develop and implement proposals to extend this to other functions along with alternative approaches to develop people in line with current and future skills needs.
- Improve resilience across the GLAA to reduce the risks of or from single person dependent points of failure.
- Develop and implement programmes of learning to support the professionalisation of functions across the GLAA in line with nationally recognised occupational standards and accreditations (e.g. PIP, IPP, CIPD, CIMA).

Objective 6: Provide efficient and effective service, sound governance, robust risk management and value for money

As a public body we have a responsibility to deliver a high quality, effective service, which demonstrates value for money. We will be bold and ambitious in our aims to protect vulnerable workers, whilst operating within a sound financial framework.

Key Deliverables

- Develop Business case(s) for future growth and investment with a focus on spending review opportunities and timescales, ensuring that these are realistic by way of costs and clear in terms of benefits for vulnerable and exploited workers.
- Provide a revised costing model for licensing activity, that can be used as a basis for costing the full range of the GLAA's activities and outcomes.
- Development and delivery of in-year efficiencies and savings for 2020-21, to ensure expenditure is in line with the level of available funding and budgetary pressures on the delivery of strategic objectives is clear.
- Produce a medium-term financial plan with a sustainable level of recurring costs, using work to identify efficiencies to re-invest in the delivery of the authority's strategic priorities and achieve value for money.
- Finalise the development of the strategic risk register and team registers, ensuring these are reviewed regularly through the existing approved governance processes and that accepted internal audit recommendations are monitored and delivered to agreed timescales.
- Review of internal governance and decision making and implementation of changes, taking account of recommendations made in previous internal audit reviews.
- Complete the first draft of the Annual Report and Accounts before July 2020.

Part 3: Performance Measures 2020-2021

Performance measures for 2020-21

In addition to the key deliverables set out against each objective in the sections above, this table describes the performance measures that will be used to track progress against each objective during the year.

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21
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 NRM and MS1 referrals combined = 105	8,135* To increase the overall number of NRM and MS1 referrals by 10% to 116
		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 an NRM or MS1 from the baseline
		Numbers of Tier 1 resolution (Regulated Sector Only) The overall number of workers affected	72** 110**	To increase from the baseline of 72 and 110 by 30%
<p>Note:</p> <p>* 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.</p> <p>** 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</p>				

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21
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
	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
	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 Straightforward grant of Licence = 2 days	To Improve to Revocations 5 days, ALC = 2 days, and 1 day respectively

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21
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
		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 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)	GLAA's level of activity across digital engagement channels and the accumulated reach (social media, website visits)	(a) 2,928 activity levels (b) 399,087 impressions pcm	To increase by 10% (a) activity levels to 3,220 and (b) impressions to 5,267,952 (Average of 438,996 pcm).
		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

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21
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
		Investigations undertaken in Partnership	No. undertaken = 164	To maintain baseline at approximately 40% of cases – target 140 (based on total investigations)
	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
		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 ^{^^}
[^] 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 2019-20.				

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)
		Proud to work for the GLAA	94% (baseline)	94% (maintain baseline)
		Treated with fairness and respect	84% (baseline)	84% (maintain baseline)
		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%
		Average people turnover	21.6%	reduce 2019-20 level and remain under public sector rate of 17.9%
		To move closer to the national workforce figures based on (a) gender and (b) ethnicity	(a) 37% (Public Sector 46%)	Move towards the public sector (a) gender and

			(b) 5.8% (Public Sector 9.9%) (c) 100% of staff declared gender (d) 51 staff have not declared their ethnicity	(b) ethnicity reducing the difference to within 10% of the public sector rate within 2020-21, and (c) Maintain the baseline of the number of staff who declare gender, and (d) reduce by 10% from the baseline the number of staff who do not declare 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

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
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%
		Medium term forecast provides a balanced budget that shows impact on activity and outcomes	Balanced Budget	Balanced Budget
		Identification of non-cash efficiencies, with focus on technological improvements	No previous baseline	5% (10 productive days per employee)
		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
	Improve Accounting Officer Assessment of Assurance	Self-Assessment against assurance model	Limited	Moderate
	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
	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