



Gangmasters &  
Labour Abuse Authority

# GLAA71.17 Stakeholder Engagement Update

**4 November 2020**

# **Board Paper Reference – GLAA71/17 - Stakeholder Engagement update**

## **1. Purpose of the Report**

- 1.1 To provide the Board with an overview of key stakeholder engagement activity during the last quarter.

## **2. Recommendation**

- 2.1 That the Board note the update and consider any further steps Board members wish to take in supporting the delivery of the GLAA's stakeholder engagement objectives.

## **3. Reasons for Recommendation**

- 3.1 The Board has a standing item to receive updates from its formal liaison groups and plays an active role in stakeholder engagement through those groups as well as more widely. However, it has also previously requested a wider update that demonstrates progress being made in line with the ambitions of the GLAA to engage effectively with its stakeholders.

## **4. Summary of Key Points**

- 4.1 The GLAA is continuing to make great strides in implementing its stakeholder engagement strategy. We have more regular stakeholder features in our quarterly partnership bulletin. Our latest edition, published in August, was sent directly to the inbox of 1,300+ subscribers, as well being circulated across social media and promoted on our website. A survey of Stakeholders was conducted in early 2020 which showed strong support for this type of regular corporate update from the GLAA. Our future ambitions also include plans to create a tri-agency Stakeholder bulletin with regular contributions from EAS and NMW.
- 4.2 The formal liaison groups both met during September and meeting notes are at Annex A. At the NGO/Worker meeting, an update was provided by FLEX of the Victim Pathways project, bringing together various stakeholders to work collaboratively to improve communication channels between victims, NGOs and the GLAA. The project team will report its progress through the NGO/Worker group. At the LU/LP meeting, attendees received a joint presentation by NCA/JSTAC regarding the non-employer exploitative model which is most prevalent amongst EU migrants working in the agricultural and associated food processing sector. The GLAA is progressing work with the NCA on a collaborative social media campaign to raise awareness of this type of exploitation.
- 4.3 The LU/LP meeting in September was poorly attended and follow up discussions with Chairs of both liaison groups were held. Dedicated support is being provided to review the Terms of Reference, expand and diversify membership and improve communication and engagement with attendees of both groups. A wider programme of work is underway to support all GLAA events migrating to online through a

professional webinar platform. The first event was held on 21 October with a webinar for the construction industry, attended by almost 100 delegates from across industry and other sectors. This will then see liaison group meetings hosted using the same method. The ambition is to hold sector-specific and regional roadshow events as regular webinars throughout the calendar year.

- 4.4 A Joint GLAA/Shiva Foundation webinar & roundtable discussion was held in August to explore how the hospitality industry can be supported to address the risk of modern slavery and exploitation. This included discussions with UK Hospitality as to a suitable launch date for the Hospitality protocol, taking into consideration the current adverse impact Covid is having on the sector. It was agreed to pause the launch until early next year but to maintain discussions and collaborative working in the interim.
- 4.5 The GLAA are continuing to lead the work of Operation Tacit in the Leicester garment industry. The Apparel and General Merchandise Public Private Protocol has been relaunched with a revised Terms of Reference. The GLAA is also shaping and delivering modern slavery and labour exploitation awareness training to support Leicester City Councils community engagement strategy and aims is to work with partner agencies within targeted neighbourhoods and communities to build greater resilience within these communities to labour exploitation as well as embed greater trust and confidence of the work of the GLAA and other law enforcement agencies.
- 4.6 Engagement with key partners is continuing with the Single Enforcement Body development. The GLAA are feeding into discussions with BEIS & ODLME re: a series of stakeholder workshops in autumn/winter of 2020/21 to explore a number of key themes that the design of the SEB will need to address. This includes a workshop to explore how the SEB should maximise community/ worker engagement and sectoral approach/ working with industry.
- 4.7 September's Aidant activity was supported by communications activity promoting the work of our operational teams – this focused on raising awareness of labour exploitation across shellfish, agriculture and other employment sectors.
- 4.8 Building on the work with Boston college, work is progressing to develop a suite of national qualifications for the post-16 education sector around employment rights and awareness of exploitative practices. Positive meetings have been held with a range of stakeholders including the TUC, NMW and EAS, all of whom have offered support and content towards the design and build of the qualifications. The first of these qualifications (level 1) will be piloted later this year ready for launch in early 2021.
- 4.9 During October we ran a series of informal workshops with key stakeholders to help us develop options for a new compliance strategy. Set up as small group informal discussions, some of our key stakeholders freely shared their views and expertise on how we could make best use of our limited compliance resources and ensure compliance within the regulated sector. The results of this work and next steps for the compliance strategy are set out in a separate Board paper.

## **5. Financial Implications and Budget Provision**

5.1 Stakeholder engagement is a key component of senior roles and therefore already provided for in terms of resources. Activities outlined above are contained within existing budgets.

## **6. Organisational Risks**

6.1 The approach taken to engaging with stakeholders is designed to mitigate organisational risk, in particular reputational risk. The activity outlined above includes an example of how the GLAA is building increased partnership working with its stakeholders where common areas of interest are highlighted. The victim pathways project provides the potential to develop stronger and deeper relationships with key stakeholders that go beyond the boundary of information sharing and networking.

6.2 Increased engagement can increase the risk of demands that outstrip the GLAA's resources and reputational risk if partner expectations are not met. This risk is mitigated through a structured approach to dealing with partner requests and through dialogue with partners to ensure that resource limitations are understood at an early stage. The risk is also mitigated through harnessing partner resources to support GLAA objectives, as in the challenge of reaching workers as noted above.

6.3 There are also risks that relate to the ownership and management of stakeholder relationships at a senior level where these are not clearly allocated and/or reach across a number of different colleagues. This risk is being mitigated through the ongoing review of our Stakeholder analysis, built around a mapping exercise conducted in 2019.

## **7. Policy Implications and Links to Strategic Priorities**

7.1 Effective stakeholder engagement underpins all of the strategic plan objectives.

## **8. Details of Consultation/EQIA**

8.1 The Board has previously seen the stakeholder engagement strategy and tactical plans for comment. No EQIA has been carried out in this area, though this will fall within the remit of a review of this activity in Q2 of 2021/22.

## **9. Background Papers and Relevant Published Documents**

9.1 Minutes and notes from the Labour Provider/Labour User Liaison Group meeting held on 16 September and Worker/NGO Liaison group meeting held on 28 September are at Annex A.

**Report Author:** Frank Hanson/Paul Coffey

**Senior Responsible Officer:** Dan Scully

## Draft Minutes

<b>Title of meeting</b>	<b>Labour Provider and Labour User Liaison Group Meeting</b>		
<b>Date</b>	16 September 2020	<b>Time</b>	11:00
<b>Venue</b>	GLAA, Nottingham		
<b>Chair</b>	Margaret Beels	<b>Secretary</b>	Nicola Ray
<b>Attendees</b>	LU/LP: David Camp (DC) ALP David Thurley (DT), GI Group Luiza Gomes (LG) REC (Recruitment and Employment Confederation) Katie Bishop (KB) JSTAC (Joint Slavery and Trafficking Analysis Centre) Andrea Hallam (AH) JSTAC Tim Harrison (TH) ODLME (Office of the Director of labour market Enforcement) Emily Eisenstein (EE) ODLME  GLAA: Margaret Beels, (MB) GLAA, Chair Suzanne McCarthy (SM) GLAA Board Member Linda Dickens (LD) GLAA Board Member Ziggy MacDonald (ZM) GLAA, CEO Ian Waterfield (IW) GLAA, Head of Operations Nicola Ray (NR), GLAA, Head of Regulation Frank Hanson (FH) GLAA, Head of Prevent and Partnerships Darryl Dixon (DD), Head of SEB project		
<b>Apologies</b>	See note below.		

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**1. Welcome and Introductions:**

Margaret Beels (Chair) welcomed attendees. MB introduced SM as the new chair and ZM as the interim Chief Executive following the departure of Michael Rich.

A note of the last meeting in June will be circulated to members.

It was noted that the invitation to the meeting had been sent out late and did not appear to have been received by all the intended recipients.

**ACTION: Minutes from the last meeting to be circulated to the group (Action NR).**

**ACTION: NR to identify why LU/LP members appear not to have received the meeting invite**

## 2. Operational Update (IW)

- Op Aidant is currently focusing on high risk sectors where there are significant Intelligence gaps. Have focused on shellfish gathering as there has been an upturn in activity.
- GLAA was concerned that labour exploitation would be displaced from nail bars and car washes into the GLAA regulated sector but this hasn't occurred. At an early stage of lockdown there had been far less information coming into GLAA but information is now starting to flow in as well.
- GLAA is leading a task force partnership targeted at textile work in Leicester. Other members include Leicester City Council, Leicestershire Police and the NMW Team. Currently identifying opportunities for disruption with partners. Some premises have been visited where there are concerns. However, the taskforce is also trying to work with compliant businesses to raise awareness of issues.
- Targeted community engagement work also being undertaken led by Leicester City Council
- IW reiterated that partnership work was making the approach to the Leicester effective.
- Textile businesses are already being engaged through the Apparel and merchandising group. Will continue to drive engagement through this group.
- DC felt that many of the issues in Leicester could be addressed through a "fit for trade" licensing scheme. He noted that it is hard for legitimate bodies to run a viable business as there are so many issues in the supply chains.
- DT asked for an update on specific case.

**ACTION:** DT will contact IW to discuss.

- EE was interested in the impact on car washes and how workers survived during lockdown. IW will provide some information on this sector to EE. MB commented that she had recently met with the Romanian Labour Attaché who confirmed that the Romanian community were providing help to workers. It was commented that this too might lead to cases of exploitation.
- KB confirmed that there was a rise in labour exploitation and debt bondage.

## 3. Licensing/Compliance Update (NR)

- NR gave an overview of current compliance activity.
- The trends from inspections remain the same as regards:
  - Holiday pay;
  - Induction training not being paid;
  - Workers being paid on the books for a minimum number of hours (16) then rest of hours worked paid off books (difficult to identify)
- Currently working on Op Aidant – doing worker interviews and visiting LP's.
- Since 1/07/20 to 15/09/20 taskings issued to the Compliance team:
  - AI 42
  - CI 9
  - CPA 5
  - Others 4

Total 60

## 4. Compliance Strategy work and Fees (ZM)

- Considering the GLAA's compliance strategy and how to use the limited capacity in compliance effectively. The plans were to conduct some informal discussions to test out some ideas. These will be completed over the next 3-4 weeks. Suzanne McCarthy is working with the Executive on this initiative.
- Options for formal consultation will be presented to the Board in November.
- GLAA has started to think about fees and the review of compliance will inform this work. This is a more long-term project though as this could be picked up as part of the SEB creation programme.

#### **5. How have LP/LU's faced the Challenges from COVID19.**

- DT commented that the business has embraced new ways of working and are using remote systems for recruitment which are working well.
- Ensuring the working environment is COVID secure has also been successful
- DC was giving a lot of advice initially, but this has now settled down and members have adapted to new ways of working.
- LP's are preparing for winter and there has been some good practice identified. DC has tried to engage with Public Health and Defra Food Resilience Forum so that can collaborate on issues.

#### **6. Models of Labour Exploitation (AH and KB)**

- AH and KB gave a presentation on current JSTAC models of labour exploitation. Their work is around the threat of Modern Slavery.
- DC would welcome a meeting to discuss work he is doing on an app for workers and the "Fair's Fair programme" which aims to engage supermarkets on a fair supply costs model.

**ACTIONS:** DC to contact JSTAC and GLAA to arrange for a repeat of the JSTAC presentation to be made to a larger meeting of LP/LU Liaison

#### **7. Shellfish Working Group (IW)**

- IW reported that there has been a significant increase of activity in this area. He is looking for volunteers for a working group to garner intelligence and share awareness.
- Currently considering how to promote the group.

**Action:** Report back to future meeting

#### **8. ALP Issues**

- DC requested an update on the SEB, the release date for the latest Strategy from ODLME and the GLAA's approach to financial intermediaries
- EE reported that the DLME strategy for 20/21 has been submitted to BEIS and the HO and they are reviewing the recommendations. Ministerial approval is still required, and it has been waiting since March.
- MB confirmed that the government's response to the DLME 19/20 strategy might be published soon. (Note this has now been published)
- On the SEB, DD confirmed that awaiting approval from Ministers as regards the direction of travel. Once this clear GLAA can frame its strategy.

#### **9. How do attendees want to use the meeting and what is valued?**

	<ul style="list-style-type: none"> <li>Given the issues with the meeting invite, it was agreed that consideration would be given to finding a new date for the meeting.</li> <li>SM, MB and NR would convene a meeting with DC to discuss taking this forward.</li> <li>The T.O.R needs to be reviewed at a future meeting.</li> </ul> <p><b>10. A.O.B</b></p> <ul style="list-style-type: none"> <li>None raised.</li> </ul> <p><b>Date of Next Meeting 26 November 2019, 11:00 am to 13:00pm</b></p>
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## Minutes

<b>Title of meeting</b>	<b>17<sup>th</sup> Meeting of Worker/NGO Liaison Group</b>		
<b>Date</b>	28 September 2020	<b>Time</b>	11:00
<b>Venue</b>	Skype		
<b>Chair</b>	Linda Dickens	<b>Secretary</b>	Frank Hanson/Helen Hall
<b>Attendees</b>	<p>Margaret Beels (MB) GLAA Chair  Linda Dickens (LD) GLAA Board member/Chair of Worker/NGO Liaison group  Darryl Dixon (DD) GLAA Head of Single Enforcement Body Programme  Frank Hanson (FH) GLAA Head of Prevention &amp; Partnerships  Helen Hall (HH) GLAA Campaigns &amp; Engagement Officer  Suzanne McCarthy GLAA Board member  Ziggy MacDonald (ZM) GLAA Chief Executive - interim  Dan Scully (DS) GLAA Director</p> <p>Ake Achi (AA) Migrants at Work  David Dickens (DDi) Fishermen's Union  Lucila Granada (LG) FLEX  Bridget Henderson (BH) Unite the Union  Dolores Modern (DM) Latin Women's Rights Service  Narmanda Thiranagana (NT) Unison  Haydn Cornish-Jenkins (HCJ) Stop the Traffik</p> <p>Ed Bateman (EB) Office of the Independent Anti- Slavery Commissioner  Emily Smith (ES) International Slavery Museum Liverpool</p>		
<b>Apologies</b>	Patrick Burland, International Organisation for Migration Andrew Wallis, Unseen Ian Waterfield, GLAA		

1	<p><b>Welcome and Introductions</b></p> <ul style="list-style-type: none"> <li>Linda Dickens opened the meeting by welcoming all attendees and inviting them to introduce themselves.</li> </ul>
2	<p><b>Apologies</b></p> <ul style="list-style-type: none"> <li>Noted as above.</li> </ul>
3	<p><b>Minutes of the last meeting</b></p> <ul style="list-style-type: none"> <li>The minutes were agreed as a record of the previous meeting.</li> </ul>
4	<p><b>Actions arising from the previous meeting</b> The action points report was noted.</p> <ul style="list-style-type: none"> <li><b>AP15.2</b> BH has forwarded evidence for the low pay commission. <b>FH</b> to circulate. <b>Ongoing</b></li> </ul>
5	<p><b>GLAA Updates</b></p> <p><b>a) Performance Report</b></p> <ul style="list-style-type: none"> <li>The group noted the report circulated prior to the meeting.</li> <li>ZM discussed the Performance Measures which are under consideration on how best to capture the breadth of work that the GLAA undertakes and the key work being undertaken e.g. <b>Licensing</b> - under consideration is the duration of Application Inspections. <b>Victims</b> – the GLAA needs to better present a much richer picture of how it is protecting and assisting vulnerable and exploited workers than current performance indications allow. <b>Prosecutions</b> – the lengthy delays in getting prosecutions to court and how this is impacting on victims.</li> <li>DS added that the volumes of information coming into the GLAA now are rising significantly. The organisation is reviewing how to reshape the approach to messaging as not all the information is relevant to the GLAA.</li> <li>HCJ asked if this information could be shared.</li> <li>DDi gave praise to Communications for the updates circulated by them which have proved very useful. He noted that there are issues with stranded seafarers and examples of people from Ghana not wishing to enter the NRM as they are not able to earn. They just disappear.</li> </ul> <p><b>Action</b> <b>AP16/1</b> Once completed share with the group the new approach to messaging. <b>DS</b></p> <p><b>b) Current initiatives</b></p> <ul style="list-style-type: none"> <li>ZM gave an update on the Single Enforcement Body and the preparatory work with Department of Business, Energy and Industrial Strategy (BEIS) and the Director of Labour Market Enforcement (DLME). He noted the DLME post was being advertised, the interim Director will finish in January 2021.</li> <li>NT asked if there was more information on timing and whether this SEB would be incorporating enforcement of equality legislation. ZM advised that the GLAA is awaiting a Government response on timing. DD outlined reasons why equality bodies might not be seen initially as a good fit.</li> <li>Compliance inspections – a working group has been formed to review the approach to compliance inspections in the licensed sector with the aim of improving productivity.</li> <li>BH added that workers are being placed at greater risk of exploitation as more desk-based compliance inspections are taking place due to the impact of COVID-19.</li> <li>AA added the COVID-19 was also impacting on the length of time to determine NRM referrals which have resulted in the victims instead deciding to return home or go</li> </ul>

back to the abuser. DS asked for specific examples which he could relay to the Home Office.

**Action**

**AP16/2** AA to provide examples to DS/FH for feedback to the Home Office. **AA/FH/DS**

6	<b>Leicester Textile and Garment Industry</b>
	<p><b>a) Operational response Leicester garment industry</b>  DS updated the group on the operational response to the concerns expressed around working conditions and exploitation in the Leicester textile and garment industry. GLAA is the lead agency in a multi-body enforcement taskforce. This has now been operative for 7 weeks and over 100 factory visits have been undertaken in partnership with Leicestershire Police, HSE and NMW. The investigations have found wider mistreatment of workers and Health and Safety breaches. Some immediate positive effects include workers receiving contracts of employment and NMW pay.  The challenge is to increase reporting of labour abuse and the GLAA is working with Leicester City Council (LCC) to support their engagement strategy.</p> <p><b>b) Discussion on Impact and implications for labour market &amp; vulnerable workers views</b>  BH asked for a written update of progress and stated this model of joint partnership working is needed in other sectors including agriculture/fresh produce as exploitative business model used in the garment industry is not new.</p> <p>HCJ asked if the GLAA had a list of businesses who, following factory visits, were identified as non-complaint which were previous certified by auditors as compliant.</p> <p>NT – the critical issue is to de-couple immigration enforcement from labour rights enforcement so that vulnerable workers feel secure in coming forward to report labour abuse. She further noted that many affected workers in Leicester were not likely to be migrants and cautioned against stereotyping communities.</p> <p>LG – the lack of trust is an issue generally and a secure reporting pathway required as both non-documented workers and documented workers may feel uncertain about their immigration status.</p> <p>AA suggested that statutory agencies should work more closely with community agencies to help build confidence and trust.</p> <p><b>Action</b>  <b>AP16/3</b> DS to provide list of non-compliant businesses visited who were previously compliant. <b>DS</b>  <b>AP16/4</b> DS to provide a written summary of Operation Tacit to date. <b>DS</b></p>

7	<b>Prevention</b>
	<p><b>a) Overview of GLAA prevention activities</b></p> <ul style="list-style-type: none"> <li>• FH outlined key prevention activities which the GLAA are currently progressing: -</li> <li>• Industry profiles have been updated and will be shortly be published on the GLAA website. LG commented that FLEX had previously sent to the GLAA data regarding to the cleaning sector.</li> <li>• The GLAA are designing a suite of national ‘Preventing Labour Exploitation’ qualifications in partnership with Skills Education Group, Boston College and the University of Nottingham Rights Lab. These will be piloted later this year with the aim to be ready for 2021-22 academic year. AA welcomed this project to help improve knowledge and understanding to vulnerable workers. LG asked if the content will include a gender perspective. FH confirmed that the content will consider all equality characteristics when being designed.</li> <li>• Key prevention work is being undertaken as part of Operation Tacit to support LCC’s community engagement work in the Leicester garment industry and other sectors.</li> <li>• GLAA are supporting the progression of the Responsible Car Wash Scheme to support car washes to operate compliantly and to drive up standards through the sharing of best practice.</li> <li>• This work has been boosted by £110k research funding awarded to Nottingham Trent University.</li> <li>• GLAA are contributing in the creation of a resource pack to be used by anti-slavery partnerships and network forums. The project is led by Wilberforce Institute (University of Hull) and will complete later this year.</li> <li>• Work is being finalised on the GLAA hospitality protocol – a joint agreement for hospitality businesses to work collaboratively with the GLAA to stop or prevent the exploitation or abuse of workers in the hospitality sector. Discussions are ongoing with the Shiva Foundation and the UK Hospitality on a suitable date for its launch.</li> </ul>
	<p><b>b) Victim Pathway Project,</b></p> <ul style="list-style-type: none"> <li>• LG outlined the victim’s pathway project, a project working with the GLAA, NGOs and trade unions to consider opportunities to improve communication channels between victims, NGOs and the GLAA. The first meeting is scheduled to take place on 29/9/20.</li> <li>• LD asked LG if this group could be updated of the progress of this project.</li> </ul> <p><b>Action</b>  <b>AP16/5</b> LG to update group on the progress of the Victim Pathway project.</p>
	<p><b>c) Communications and engagement activity</b></p> <ul style="list-style-type: none"> <li>• HH updated the group.</li> <li>• Partnership bulletin – the next edition is due in November; an invitation was extended to all partners to contribute news/information.</li> <li>• Operation Aidant – this included operational activity on UK coastline in response to a significant increase in allegations of unsafe working conditions and labour exploitation in shellfish gathering.</li> <li>• GLAA webinar – planned for 21 October which will be focusing on the construction industry.</li> <li>• Joint comms work is taking place with NMW/EAS to help strengthen campaigns and partnership working.</li> </ul>

8	<p><b>Labour User /Labour Provider Liaison Group meeting 16 September 2020 update</b></p> <ul style="list-style-type: none"> <li>• MB provided an update from the recent meeting, the agenda items included: -</li> <li>• <b>Operation Aidant</b> – this has focused on shellfish gathering as there has been an upturn in activity.</li> </ul> <p><b>Licensing/Compliance</b> – an overview of the current compliance activity.</p> <p><b>Compliance Strategy work and Fees</b> – the GLAA is considering how best to use the limited capacity in compliance and will be conducting some informal consultation to test out some ideas. These will be small group discussions and completed over the next 3-4 weeks. This work will be sponsored by Suzanne McCarthy GLAA Board member. Options for formal consultation will be presented to the Board in November.</p> <p><b>COVID-19</b> – how LU/LPs have faced the challenges of the pandemic.</p>
9	<p><b>Modern Slavery exhibition – International Slavery Museum Liverpool</b></p> <ul style="list-style-type: none"> <li>• Emily Smith gave a presentation on the work of the museum to introduce a narrative about contemporary slavery.</li> <li>• The aim is to engage and help raise public awareness.</li> <li>• It is looking to explore what is modern slavery, what is being done about it looking from the perspective of victims/survivors, law enforcement and the criminal justice system.</li> <li>• A general discussion took place about the importance of this and its relevance given recent events around the history of the UK and slavery. Various questions and comments were made which can be pursued through direct engagement. ES would provide her contact details.</li> </ul> <p><b>Action</b>  <b>AP16/6</b> ES to provide an overview of her notes and the plans for the museum regarding modern slavery and human trafficking for circulation to the group. <b>ES</b></p>
10	<p><b>AOB</b></p> <p>a) AA asked that the work of his organisation Migrants at Work be brought to the attention of the lu/lp liaison group.</p> <p><b>Action</b>  <b>AP16/7</b> FH to facilitate engagement between AA and LU/LP liaison group. <b>FH</b></p>
11	<p><b>Date of next meeting:</b>  1 December 2020, 11:00 – 13:30</p>