



# Gangmasters & Labour Abuse Authority

## Minutes

<b>Title of meeting</b>	<b>GLAA 69<sup>TH</sup> Board Meeting</b>		
<b>Date</b>	22 July 2020	<b>Time</b>	10:00
<b>Venue</b>	Skye/Zoom		
<b>Chair</b>	Margaret Beels (MB)	<b>Secretary</b>	Jennifer Clarke

<b>Attendees</b>	Simon Allbutt (SA) William Butler (BB) Linda Dickens (LD) Suzanne McCarthy (SM) Julia Mulligan (JM) Paul Williams (PW)
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### **In attendance**

Paul Coffey (PC) Head of Communications  
Darryl Dixon (DD) Head of Single Enforcement Body Programme  
Nicola Ray (NR) Head of Regulation  
Justin Rumball (JJR) Head of Business & Finance  
Dan Scully (DS) Director of Resources  
Ian Walker (ISW) Head of Intelligence  
Ian Waterfield (IW) Head of Enforcement (part)  
Tom Frost (TF) Performance Analyst (item 10 only)

### **Observers**

Suzelle Dickson, Home Office  
Olivia Hesketh, Home Office  
Elinor Howard, Home Office  
Ziggy MacDonald, Home Office

<b>Apologies</b>	Rebecca Kirby Zoe Wilkinson Frank Hanson
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1	<b>Introductions</b>
2	<b>Apologies</b> <ul style="list-style-type: none"><li>As above.</li></ul>
3	<b>Minutes of the Previous Meeting</b> <ul style="list-style-type: none"><li>The minutes of the previous meeting were accepted as an accurate record.</li></ul>

4	<p><b>Declarations of Interest</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>
5	<p><b>Action Points</b></p> <p><b>BM49(21) Board member profiles</b> –in progress <b>PC</b></p> <p><b>BM50(10)</b> ARC to take responsibility for tracking and reporting to the Board on actions agreed during “Deep Dives”. <b>MB/BB</b> to refresh group of deep dive subjects</p> <p><b>BM51(1)</b> (3) (4) (7) (8) (9) (10) (11) (14) (16) (18) (19) (20) (23) (24) (25) – closed</p> <p><b>BM51(2)</b> Related parties – action to be completed by November Board meeting</p> <p><b>BM51(5)</b> GLAA to consider whether its experience of protocols could add value to IASC maturity model - FH to provide an update of meeting with Emma Crates, Office of ISAC post 22 July</p> <p><b>BM51(6)</b> Invite DLME to future Board meeting - awaiting confirmation of attendance from DLME.</p> <p><b>BM51(17)</b> MB in receipt of the lessons learned document from Michael Rich (MR). DS to add to the report. JM had gathered views during her induction. This will be picked up as part of the Board lessons learned on how the executive and the Board work together.</p> <p><b>BM51(12)</b> BB requested that term BAME be removed from the slide</p> <p><b>BM51(13)</b> H&amp;S report due at November Board meeting</p> <p><b>BM51(15)</b> ARA – DS recognised that the action rested with him to provide the draft text to MB/BB. He would progress this recognising that the NAO audit was scheduled for late August/September</p> <p><b>BM51(21)</b> Progress Report on Action Plan to ARC due in September - on track</p> <p><b>BM51(22)</b> DD/FH to provide timescales to the plan from the joint liaison group meeting</p> <p><b>Action</b></p> <ol style="list-style-type: none"> <li>1. ARC to report on follow-up actions from “Deep Dives” <b>WB</b></li> <li>2. Refresh deep dives subjects. <b>WB/MB</b></li> <li>3. DS to progress the production of the ARA draft text for review by <b>MB/BB</b>.</li> </ol>
6	<p><b>Declaration of Urgent Business</b></p> <p><b>CEO appointment</b></p> <ul style="list-style-type: none"> <li>• MB noted that the resignation of Michael Rich had engendered a sense of shock within the Leadership Team and Board members and outside the GLAA.</li> <li>• She was pleased to report that ministers had now approved that Ziggy MacDonald, Home Office, be appointed as Interim CEO from 1 August 2020. His appointment would be for a period of 9 months. MB welcomed him to the organisation.</li> <li>• MB outlined the recruitment process for the permanent CEO. It was noted there would be engagement with GLAA colleagues including the Leadership Team and the Employee Representation Team (ERT); other stakeholder views will also be fed into the process.</li> <li>• Remco will take the lead on recruitment working with MB to provide an action plan. MB had undertaken to keep HO Ministers informed throughout the process.</li> <li>• Discussion took place around the Single Enforcement Body (SEB) and what it means for the tenure of the appointment of a permanent CEO.</li> <li>• MB noted that the GLAA Regulations provide that the appointment of the CEO is made by the GLAA Board having secured the approval of the Secretary of State.</li> <li>• ZM thanked the Board for the opportunity; he looks forward to his tenure.</li> </ul>

**Home Office update**

- The Board noted the report provided by the Home Office (HO) Sponsorship Unit in advance of the meeting.
- Framework Agreement – recommendation noted by the Board that no changes are required.

**Elinor Howard**

- Business Plan 2020-21 and Strategy 2020-23 are awaiting Ministerial decisions, they are subject to prioritisation in the current environment and may take longer than usual.
- The Spending Review has just been announced. HM Treasury will accept representations until 24 September 2020.
- The Minister will shortly be considering her options for recruiting a new Chair and Board members whose term of appointment end in 2021.  
It was noted that the HO and Cabinet Office are working on the need for greater diversity (particularly ethnicity) of NEDs.
- LD asked for the opportunity for the GLAA to feed in thoughts on skills and expertise gaps and for the recruitment of this ALB. EH agreed this would be helpful

**Action**

4. In the light of the ministerial decision as to how to progress the recruitment of NEDs, HO to seek GLAA Board view of skills/expertise gaps to be filled. **EH**

**Suzelle Dickson**

- The Shared Outcomes Bid was unsuccessful. Work will continue how we need to tackle the issues in hand car washes and nail bars.  
SD thanked Paul Elms, GLAA for pulling this bid quickly together.
- The position on the COVID-19 response and the Leicester allegations were noted.  
HO to continue working closely with the GLAA and provide support on the Leicester task force.  
Discussion took place around the call for licensing in the textile trade.  
It was agreed a paper should be produced of short/long term findings of the Leicester investigation with ZM, BEIS, DLME & HO colleagues with a particular eye on messages relevant to the creation of the SEB.
- TISC – hoping to publish the Government response to the public consultation on TISC in the summer
- SAWS consultation - published on 20 July with new proposals.
- The Government Policy Statement on new immigration status was published on gov.uk on 13 July.
- HO to continue working with BEIS on SEB legislative timing and remit and DLME Strategy review.

**Action**

4. Produce a paper on the short/long term findings of Leicester investigations **DS/IW**.

12	<p><b>Project Aidant update</b></p> <ul style="list-style-type: none"> <li>• IW updated on Project Aidant 22 June - 10 July. Over 100 deployments took place through this period.</li> <li>• The key areas of focus were Prevention, Raising Awareness, Intelligence Gaps and Protection.</li> <li>• A further week of action will take place across the EU14 - 20 September tackling labour exploitation issues.</li> <li>• SM raised the issue of how we will relate with European investigations / enforcement colleagues after Brexit. It was agreed that this was an important topic on which the Board should spend some time.</li> <li>• Some early findings of displacement of Vietnamese workers from nail bars to cockle picking have been reported.</li> </ul> <p><b>Action</b></p> <p>5. Add to 2 September Board meeting agenda joint working with EU investigation/enforcement colleagues after 1 January 2021. <b>JC/DD</b></p>
9	<p><b>Single Enforcement Body update</b></p> <ul style="list-style-type: none"> <li>• DD provided an updated on the SEB.</li> <li>• As previously reported delays have occurred due to access to the Minister post re-shuffle, COVID-19 lockdown and some temporary re-deployments.</li> <li>• This has also delayed the progression of the Employment Bill.</li> <li>• The issues in Leicester have generated interest in the SEB.</li> <li>• The Home office Permanent Secretary held a deep dive and views were given by OGDs re Leicester and the SEB.</li> <li>• The Leicester taskforce may provide opportunities to test approaches and use of powers that could inform long term approaches for the SEB which the GLAA will discuss with BEIS.</li> <li>• The GLAA activity on SEB will be managed by a mini project team.</li> <li>• Its was agreed that to achieve a strong programme discipline the actions needs to be tightly defined.</li> <li>• It was agreed the Board should review the October 2019 GLAA response to the SEB consultation and provide any other thoughts given developments since then. This would feed into the Strategy discussion on 24 September.</li> </ul> <p><b>Action</b></p> <p>6. Board members to comment to DD on the Strategic direction for SEB by 14.08.20</p>

10	<p><b>Performance</b>  <b>Q1 April – June 2020</b></p> <ul style="list-style-type: none"> <li>• The Board noted the performance report for Q1 April - June 2020.</li> <li>• It was noted that NRM statistics give a limited view of GLAA effectiveness. For example, they exclude workers assisted to find new work and accommodation during Aidant.</li> <li>• Given the major change in the landscape due to COVID -19 PW proposed resetting targets that the GLAA would miss through no fault of their own rather than simply having to note through the rest of the year that targets had been missed</li> <li>• Objective 3 - JM requested some context in which to assess the communications statistics.</li> <li>• Objective 6 - JJR to work with TF to find 2020-21 measures relating to the internal audit opinion and outstanding Internal Audit recommendations.</li> </ul> <p><b>Action</b></p> <p>7. Add to the performance pack the outcomes to illustrate better GLAA effectiveness in terms of impact on vulnerable workers. <b>PW/IW/TF</b></p> <p>8. Consider updates to performance targets affected by of COVID-19 <b>PW/JM/IW/TF</b></p> <p>9. Circulate most recent version of Communications Strategy to the Board <b>PC</b></p> <p>10. Find new measures surrounding key objective 6. <b>JJR/TF</b></p>
11	<p><b>Stakeholder Engagement</b></p>
11a	<p>Stakeholder Engagement update</p> <ul style="list-style-type: none"> <li>• MB thanked PC for the paper giving reassurance that stakeholder engagement continues to evolve and move forward and that the GLAA is delivering on it.</li> <li>• The Board noted the overview of key stakeholder engagement activity during the last quarter detailed in the paper.</li> <li>• Stakeholder engagement cost benefit to be added to future reports (where we are spending money &amp; what we are getting back).</li> <li>• LD to discuss with Board members the stakeholder engagement plan and reallocate areas between Board members where appropriate.</li> <li>• It was noted that SM would be taking the lead on the labour provider/labour user meeting and considering what we can do to attract others to the meetings of the group with Frank Hanson.</li> </ul> <p><b>Action</b></p> <p>11. Add stakeholder engagement cost benefit to future reports. <b>FH/PC</b></p> <p>12. Discuss with Board members the stakeholder engagement plan and re allocate areas between them where appropriate. <b>LD</b></p> <p>13. Re energise stakeholder engagement with the lu/lp meetings. <b>SM/MB/FH/PC</b></p>
11b	<p><b>Liaison group update</b></p> <ul style="list-style-type: none"> <li>• The Board noted the report containing: -  the draft minutes of the Worker/NGO Liaison group meeting held on 23.06.20 and  the notes form the joint Labour User/Labour Provider NGO liaison group meeting held on 03.03.20</li> </ul>

9	<p><b>Financial position</b></p> <ul style="list-style-type: none"> <li>• Forecast outturn June 2020 - the GLAA has so far been successful in balancing its budget for 2020-21.</li> <li>• Good progress is being made on the current year's savings plan.</li> <li>• Work is progressing on scenario planning for 2021-22 and beyond.</li> <li>• The Spending review formal request is expected by the end of July and the timetable planning for submission of the bid was discussed.</li> <li>• It was agreed that any proposals should consider how GLAA might jointly present a case for savings through a more cross government approach to investigating labour exploitation.</li> </ul> <p><b>Action</b></p> <p>14. DS/JJR to discuss with BEIS &amp; HO financial proposals.</p>
13	<p><b>Policies Review update</b></p> <ul style="list-style-type: none"> <li>• The Board noted the report updating them on the policy review process.</li> <li>• DS updated the Board of the work completed to achieve regular systematic and timely reviews of GLAA policies.</li> <li>• Remco had its own schedule for its HR policies review and this needed to be accommodated within the wider review process.</li> </ul> <p><b>Action</b></p> <p>15. Comments regarding further work on policies to be sent to JM &amp; SM <b>ALL</b></p> <p>16. DS to agree with LD the approach to the review by Remco of the HR policies where Remco had a formal role. <b>DS</b></p>
14	<p><b>Risk Management</b></p>
14a	<p><b>Review of Risk Management Policy</b></p> <ul style="list-style-type: none"> <li>• The Board noted and approved the changes made to the Risk Management Policy</li> <li>• SM noted that the Policy as currently written does not refer to the three lines of defence and risk assurance statement which would identify these defences against individual risks. The second line of defence is noted as an area in need of focus, it might be useful to include reference to this in the policy.</li> <li>• SM also noted that aspects of the policy were not clear e.g. in relation to local vs strategic risk registers. She had some further detailed comments which she would pass to Jane Walker.</li> <li>• It was suggested that as part of seeking to ensure GLAA is following best practice in this key aspect of its work, Internal Audit should be asked to review the GLAA approach to Risk Management.</li> </ul> <p><b>Action</b></p> <p>17. Further editorial changes are to be made to the policy and should come back to the Board in September.</p> <p>18. ARC to consider including Risk Management in GIAA Internal Audit programme.</p>

14b	<p><b>Strategic Risk update</b></p> <ul style="list-style-type: none"> <li>• The Board noted the changes made to the Performance Pack (agenda item 10) which now shows new and changed risks, change in risk direction and score, and the new target score. DS updated the Board on the Strategic risk register highlights for Q1.</li> <li>• The Board looked at each of the new strategic risks and the update on existing strategic risks and invited comments from the leadership team on the risks for which they had responsibility.</li> <li>• It was agreed that the Leicester operation carried significant risk not least because of its profile in the press. The underlying need to substantiate the allegations was recognised. New approaches were needed to gain the confidence of workers, gather evidence and reduce the risk of appearing ineffective. The lack of engagement with the GLAA Board when the temporary licensing scheme was being developed was discussed. Although demand for the scheme had fallen off, might there still be advantages in amending the secondary legislation to provide for it in future? That might also provide a vehicle for making other improvements to the Rules</li> </ul> <p><b>Action</b></p> <p><b>19.</b> Lessons learnt regarding governance in relation to the temporary licensing scheme. to consider Home Office offer of secondary legislation which could address the risks identified <b>NR</b></p> <p><b>20.</b> Keep the Board up to date on the Leicester operations and the risk mitigations <b>DS/IW</b></p>
15	<p><b>Review of Board Code of Conduct</b></p> <ul style="list-style-type: none"> <li>• Board members confirmed that they were content that they should continue to adopt the Cabinet Office Code of Conduct for Board Members of Public Bodies (2019) as its Code of Conduct.</li> </ul>

16	<p><b>Board Evaluation Workplan</b></p> <ul style="list-style-type: none"> <li>• The Board noted the paper which set out the agreed action plan being followed by the Board in partnership with the Leadership Team following discussion of the Board evaluation at the Board meeting in April.</li> <li>• JM to meet with Emma Coxon, incoming Head of People and Change to discuss the values.</li> <li>• Performance management - other pressures COVID-19 need better performance measures. PW and JM agreed to assist with this. (Action 8 above)</li> <li>• SA recommended that a reality check takes place before the Spending Review bid is submitted.</li> <li>• DS is leading for the Exec on work to improve the relationship between the Board and LT. He has been looking at engaging a facilitator for the discussion. Given the Leicester work DS's role to engage with SM and BB might need to be delegated upwards.</li> </ul> <p><b>Action</b> 21. Further updates to be provided by action owners in November <b>ALL</b></p>
17	<p><b>Audit &amp; Risk Committee</b></p>
17a	<p><b>Chair's Report</b></p> <ul style="list-style-type: none"> <li>• The Board noted the report of the Audit and Risk Committee (ARC) held on 06.07.20</li> <li>• Significant progress has been made in clearing outstanding internal audit actions.</li> <li>• Internal audit annual opinion remained at limited assurance.</li> <li>• Executive to have regard to the guidance prepared by the NAO and GIAA on reporting on the impact of COVID-19 when preparing the Annual Report and Accounts.</li> <li>• GLAA to review actions taken during the pandemic as regards decision making, governance arrangements, risk appetite and risk management using the NAO and GIAA frameworks.</li> <li>• Further consideration to be given to the temporary licensing scheme.</li> <li>• ARC noted, in particular, the operational risk from a change in HO security protocols which was delaying emails from key partners and a number of Grievances and Subject Access Requests being received.</li> <li>• ARC members met with NAO and Internal Audit in a closed session to discuss CEO's resignation and arrangements for his replacement.</li> <li>• JJR to confirm if the letter of assurance from MR has been sent to ZM. JJR to work on this with MB.</li> </ul> <p><b>Action</b> 22. Provide ZM with the letter of assurance from MR. <b>JJR/MB</b></p>
17b	<p><b>Annual Review of the ARC Terms of Reference</b></p> <ul style="list-style-type: none"> <li>• The Board ratified the Terms of Reference for ARC.</li> </ul>
18	<p><b>Remuneration Committee</b></p>
18a	<p><b>Chair's Report</b></p> <ul style="list-style-type: none"> <li>• The Board noted the report of the Remco held on 15.05.20</li> <li>• Simon Allbutt leaves the Remco and joins the ARC, handing over the position of chair to Linda Dickens.</li> <li>• It was noted that LD would be writing a paper for Remco setting out the process and timetable for the appointment of a permanent Chief Executive.</li> </ul>
18c	<p><b>Annual Review of the Remco Terms of Reference</b></p> <ul style="list-style-type: none"> <li>• The Terms of Reference for Remco were amended in November 2019 following audit recommendation.</li> <li>• The Board ratified the TOR.</li> </ul>



19	<p><b>Timetable of Meetings</b></p> <ul style="list-style-type: none"> <li>The Board noted the paper detailing the quarterly meeting dates for 2021-2022 financial year</li> </ul> <p><b>Action</b></p> <p><b>23.</b> Circulate dates of sub-committees meetings during 2021-2022. <b>JC</b></p>
20	<p><b>Any other Business</b></p> <p>i) Agenda 2 September – This will not be a full Board meeting but is aimed at giving an update to the Board given the gap in time between the July and November meetings and the rapid pace of change in key GLAA areas. The meeting will provide a better understanding of the impact of COVID-19. Other agenda items include a deep dive, the ARA, NAO audit (scheduled to take place late August/September) and the Spending Review.</p> <p>ii) LD requested that following the restructure an organisational chart be circulated to Board members and a paper to explain the new governance boards within GLAA e.g. People Board; RIGG.</p> <p>iii) Circulate a paper detailing the composition of the Employer Representation Team and its TOR.</p> <p><b>Action</b></p> <p><b>24.</b> Circulate organisational chart. <b>JC/PC</b></p> <p><b>25.</b> Circulate a paper explaining the new governance boards. <b>DS</b></p> <p><b>26.</b> Circulate a paper detailing the composition of the ERT and its TOR. <b>DS/JC</b></p>
21	<p><b>Close &amp; Review of the Meeting</b></p> <ul style="list-style-type: none"> <li>Attendees were invited to give a review of the meeting.</li> </ul>
22	<p><b>Date of next meeting</b></p> <ul style="list-style-type: none"> <li>2 September 2020 commencing at 09:30</li> <li>Full meeting of the Board 4 November 2020 commencing at 10:00</li> </ul>