GLAA 2020-21 Q2 Performance Report

Reporting period: April 2020 – September 2020
Previous year April 2019 - March 2020
Public Facing

Business Plan Objectives

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	20-21 progress
1. Identify and support victims of labour exploitation	To work towards prioritising victims as part of our investigations	Potential victims assisted (directly/indirectly)	Victims identified = 7,396	8,135*	3,755
			NRM and MS1 referrals combined = 105	To increase the overall number of NRM and MS1 referrals by 10% to 116	NRM and MS1 referrals combined = 85
		New: To identify the percentage of investigations resulting in the identification of victims	Baseline = percentage of investigations that identified NRM or MS1 referrals in 2019-20 = 12%	To increase the percentage of cases generating a NRM or MS1 from the baseline	7%
		Numbers of Tier 1 resolution (Regulated Sector Only)	72**	To increase from the baseline of 72 and 110 by 30% to 94 and 143 respectively.	16
		The overall number of workers affected	110**		638

Note:

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

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

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	20-21 progress
2. Maintain a credible licensing scheme, creating a level playing field and promoting compliant business growth	To address the time it is taking to process a licence application, ensuring this is kept to the standard	Days taken to complete licensing applications, broken into sections of process from the licence fee being cleared to the licensing decision being made	Baseline for 19-20 = 66 working days (19-20 average performance)	to reduce the average to 50 days	*Cases closed in 20-21 only 91 working days
	To review the time taken to complete a compliance investigation, allowing us to target persistent non-compliance in the regulated sector	Days taken to complete compliance investigations, broken into sections, from date raised to report submitted to licensing for a decision	Baseline for 19-20 = 88 working days	to reduce to 90% in 80 days	*Cases closed in 20-21 only 166 working days
	To review time taken to make licensing decisions	Days taken to make licensing decision once all information is available	Revocation = 6 days ALC = 3 days Grant of Licence = 2 days	To Improve to Revocations 5 days ALC = 2 days Grant of Licence = 1 day	Revocation = 9 days ALC = 8 days Grant of licence = 4 days

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	20-21 progress
3. Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation	To enhance engagement with key stakeholders within sectors deemed at high risk of labour exploitation, based on the nature and scale of those risks as assessed by GLAA intelligence	Level of engagement and level of workers covered through protocol development	No previous baseline	To increase number of workers covered by GLAA–stakeholder liaison per year by 10% in supporting GLAA industry protocols	Of top 100: 97,000 out of 250,00
		Level of change reported by signatories to improve due diligence, identified by surveys of protocol signatories (compared to reported change in the preceding year)	No previous baseline	To develop the baseline from first full round of surveys with all protocol group signatories	To be confirmed
	To increase awareness of modern slavery and labour exploitation through external training, engagement with stakeholders and the dissemination of messaging using a range of communications activity (traditional media, social media, digital engagement)	Level of activity across digital engagement channels and the accumulated reach (social media, website visits)	(a) 2,928 posts (b) 399,087 average monthly impressions	To increase by 10% (a) activity to 3,220 and (b) impressions to 438,996	(a) 1,191 posts (b) 460,508 average monthly impressions
		Assessing the knowledge of stakeholders around MS and labour exploitation through surveys Accurately assess the GLAA's levels of engagement with its social and digital media audiences to gain greater insight	No previous baseline	To develop the baseline of enhanced engagement (impact/reaction) of increased social and digital media activity	To be confirmed

Objective	Aim	Measure	Baseline (target) 19-20 to 31 March	Target 20-21	20-21 progress
4. Disrupt and deter criminal activity within the labour market	To work to increase the number of GLAA-led enforcement investigations, whilst maintaining our work in partnership	Investigations undertaken by GLAA lead	No. undertaken = 226	To maintain baseline 226	97
		Investigations undertaken in Partnership	No. undertaken = 164	To maintain baseline at approximately 40% of cases – target 140 (based on total investigations)	42^^^
	To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations	GLAA-led convictions	Convictions = 8 LMEU = 6 LMEO = 0 Warnings = 23 Enforcement Notices = 43	Convictions = 10 LMEU = 18 LMEO = 1 Warnings = 34 Enforcement Notices = 47	Convictions = 0 LMEU = 3 LMEO = 0 Warnings = 12 Enforcement Notices = 6 STRO = 2
		Sanctions^	No previous baseline	To establish the baseline of the percentage of completed enforcement investigations cases in 2020-21 that resulted in a prosecution or other sanction^^	9% Finalised cases resulting in either a warning, LMEU/LMEO, notice or conviction

^ Due to the different sanctions used to achieve proportionate outcomes in 2019-20, the targets for 2020-21 reflect an increased target on performance in 2019-20 for prosecutions, enforcement notices, and the 2018-19 baseline target for LMEUs/LMEOs and Warnings.

^^ This is a new measure. The baseline will be established in 2020-21. The number of completed cases will not directly correlate to the first target under 4 (increasing the number of investigations in 2020-21) because the 2020-21 performance will include cases closed that were initiated in 19-20.

^^^ The GLAA has undertaken over 100 factory visits in partnership during OP [Name] in Leicester, although this is recorded on the system as 1 investigation.

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

|		on (a) gender and (b) ethnicity	(b) 5.8% (Public Sector 9.9%) 100% of staff declared gender 51 employees 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	3.7% 100% of GLAA employees have declared their gender. 46% - 51 GLAA employees have not declared their ethnicity
		No. of the proportion of personal development plans submitted compared to staff in post figure, and the proportion whose development requests are met in year that have training and/or development input	No previous baseline	80% of staff have a PDP 80% of staff with a PDP have their requirements met	To be confirmed
Note: ~ As a people survey has not been run during 2019-20, the target for 2020-21 is to be measured against the outcomes from the last people survey completed					

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

Prevention

Licensing

Currently there are 1,029 GLAA licence holders supplying workers to the GLAA regulated sectors.

Licence applications initiated		
April 2019- March 2020	**April – September 2020**	**% monthly change from 2019 - 2020**
147 Average 12 per month	129 Average 22 per month	76% ⬆

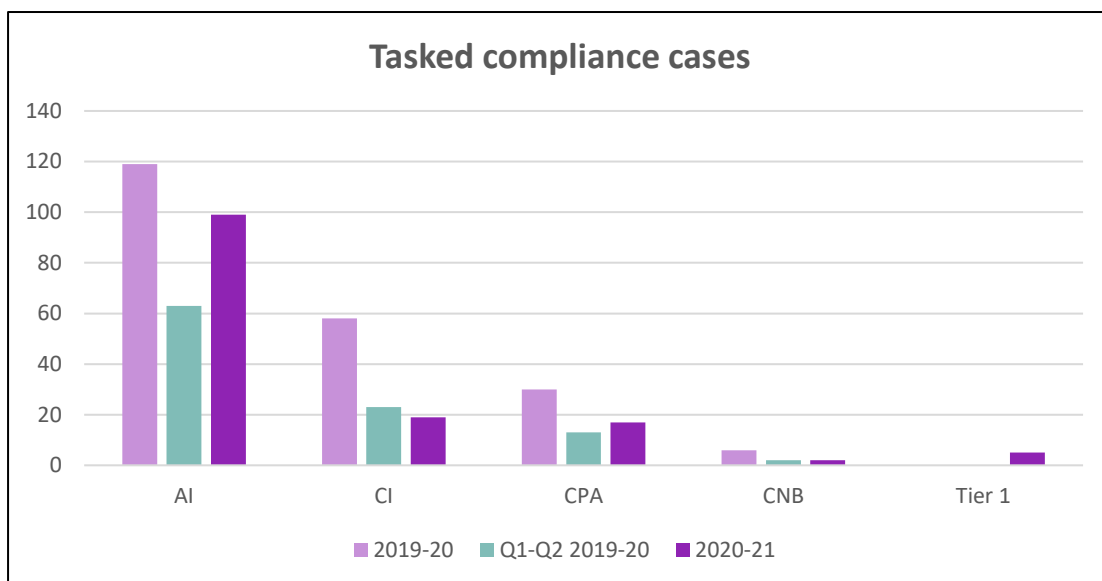**Application Inspection Decisions**
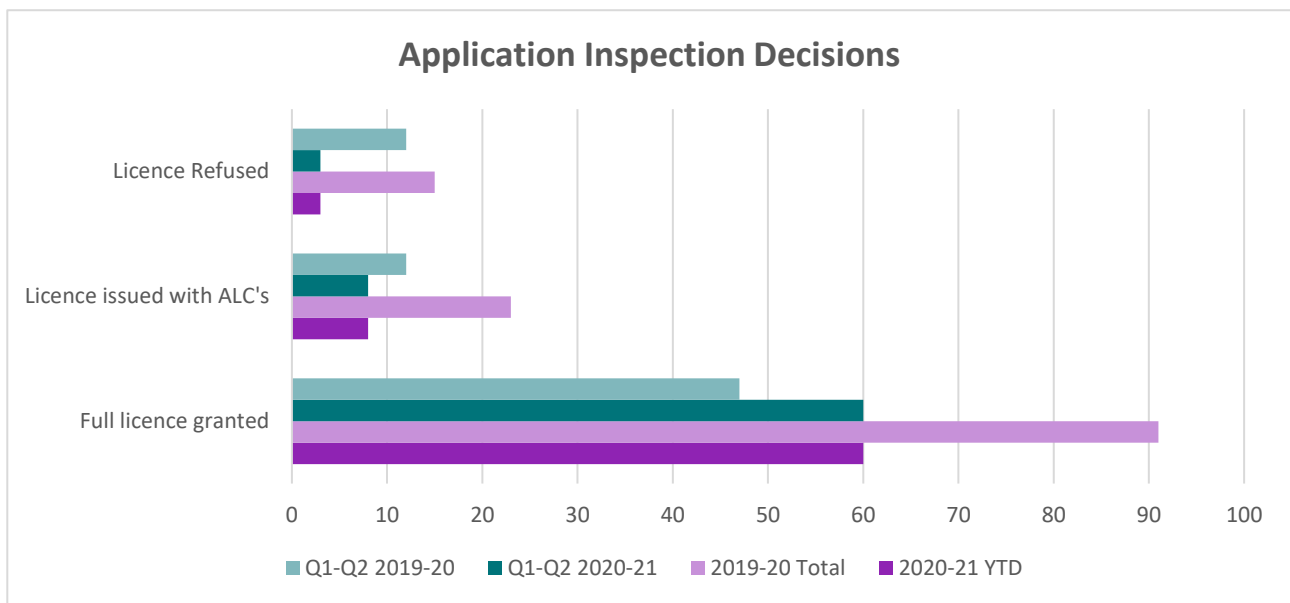
2019-20 saw 20 licences revoked **without immediate effect**, and 3 **with immediate effect.** This financial year to date, 8 GLAA licences have been revoked, all without immediate effect.
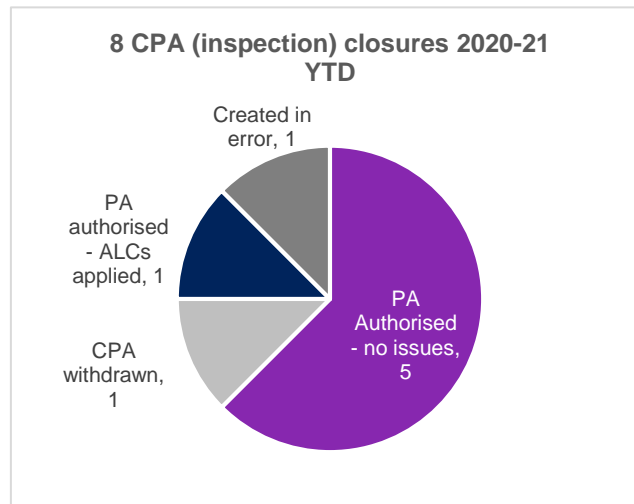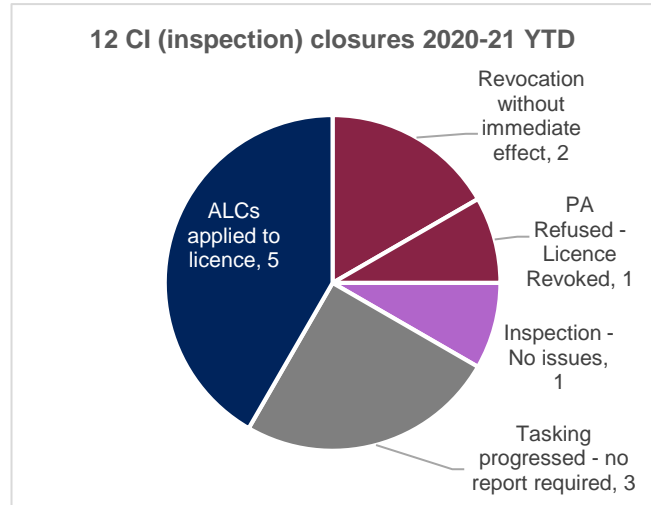
Compliance

Compliance Cases tasked Q1-Q2 2020-21		
2019-20	**2020-21 YTD**	**% change (forecast)**
213	142	33% ⬆

Compliance cases tasked in Q1 and Q2 of 2020-21 are forecast to increase by 33% when compared to the previous year. This increase is concentrated to AIs, CPAs and Tier 1s, whilst the number CNBs and CIs have decreased slightly.
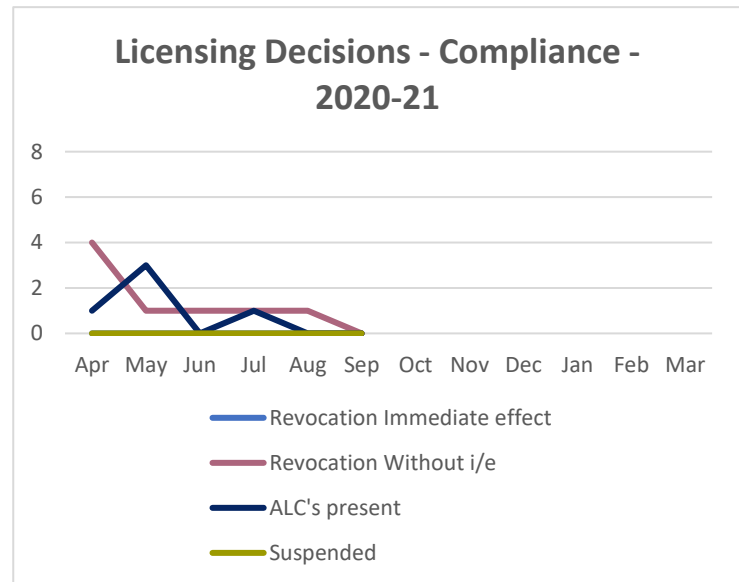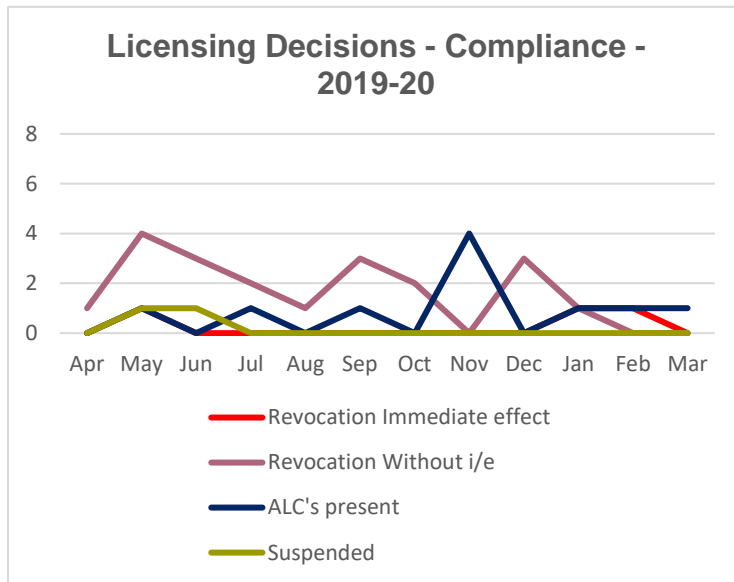
Closed cases by type

72 compliance cases in total this financial year have been finalised.

52 AI (inspection) closures 2020-21 YTD

- Application cancelled, 1
- Refused, 2
- Created in error, 1
- Granted with ALCs, 11
- Granted full licence, 37

12 CI (inspection) closures 2020-21 YTD

- Revocation without immediate effect, 2
- PA Refused - Licence Revoked, 1
- Inspection - No issues, 1
- Tasking progressed - no report required, 3
- ALCs applied to licence, 5

8 CPA (inspection) closures 2020-21 YTD

- Created in error, 1
- PA authorised - ALCs applied, 1
- CPA withdrawn, 1
- PA Authorised - no issues, 5

The outcome of cases closed over the reporting period suggests general compliance by labour providers, with the majority of investigations resulting in the granting of a licence or authorisation of the proposed PA. In instances where the tasking progresses but no report is required, it can be due to the initial allegations being proved to be completely false in the early stages of the investigation, therefore meaning a full inspection is no longer required and an inspection report is not written.

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

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

Licensing Decisions - Compliance - 2019-20

Legend:
- Revocation Immediate effect (red)
- Revocation Without i/e
- ALC's present
- Suspended

Licensing Decisions - Compliance - 2020-21

Legend:
- Revocation Immediate effect (blue)
- Revocation Without i/e
- ALC's present
- Suspended

Appeals

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

2020-21	Appeals Received	Decision
Revocation	2	2 ongoing

Communications

GLAA website (filtered view)

	Total users	Total sessions	Total page views
Q1 20-21	9,685	13,553	34,111
Q2 20-21	22,972	32,059	106,679

In June 2020, an issue was identified with the GLAA website cookie control tool, which means that Google Analytics has not been picking up visitors. This causes the numbers of visits to the GLAA website to appear low.

Visits to website broken down by UK City in Q1 & Q2.

City	Users
London	27,923
(Location Not Set)	7,431
Slough	1,775
Cardiff	1,538
Birmingham	1,530
Nottingham	1,451
Sheffield	993
Manchester	969
Leeds	935
Bristol	812

Social media breadth (September 2020)

	Number of followers
Twitter	4,920 (200 more followers than previous quarter)
Facebook	1,499 (99 more followers than previous quarter)
LinkedIn	4,207 3,928 followers (279 more followers than previous quarter)

The 20-21 Business Plan target is to increase the reach of social media by 10%, which is currently not being met. This is because impressions currently average 460,508 each month, which marks a 5% increase. The GLAA currently sees 302,094 average monthly impressions through Facebook, 134,433 through Twitter and 23,982 through Linked In.

Business Change

The GLAA's Strategy team were involved in numerous engagements with partner agencies and stakeholders from various sectors of law enforcement and the labour market this quarter. Notable engagements this quarter involved training law enforcement colleagues in identifying the indicators of labour exploitation and modern slavery, as well as explaining the role of the GLAA as part of the UK-wide Operation AIDANT. This was a week of intensified activity focusing on labour exploitation and modern slavery, where the GLAA focused on issues in the shellfish gathering sector with numerous partner agencies such as policing, local authorities and immigration enforcement.

Enforcement officers were also routinely engaged in representing the GLAA, and conducted numerous presentations to partner agencies often virtually due to the outbreak of covid-19 and social distancing requirements.

	No of Engagements (Business Change/Strategy)	No of Engagements (Syndicate staff)	Reach (approx.)
April – 20	6	2	32
May – 20	1	2	102
June – 20	0	6	1,893
July – 20	1	6	125
August – 20	4	8	1,712
September – 20	0	12	582
TOTAL	48		4,446

The number of businesses signed up to the construction protocol further increased this quarter, with 18 more businesses joining.

The number of signatories to the textiles protocols has remained stable, with no businesses joining the protocol in Q2.

Freedom of Information (FOI) requests

This financial year to date, the GLAA has received 17 requests under the FOI Act (53 requests in 2019-20). Of these, 12 responses were provided within the stipulated 20 day period, 1 response was provided outside of 20 days, 2 responses are ongoing, and 2 requests were withdrawn.

8 complaints have been received this year, 4 of which were completed and responded within 20 working days. 2 have been completed and responded to outside of 20 working days, and 2 are ongoing.

3 parliamentary questions have been received, all of which are published on the GLAA website.

Protect

Intelligence

The GLAA is an intelligence-led organisation that receives intelligence from a variety of different sources such as partner agencies, industry, and members of the public. This intelligence also arrives in several different formats, most frequently by email followed by telephone. The number of intelligence reports recorded in Q2 is below the amount recorded in Q2 of 2019-20, a reduction of 24%

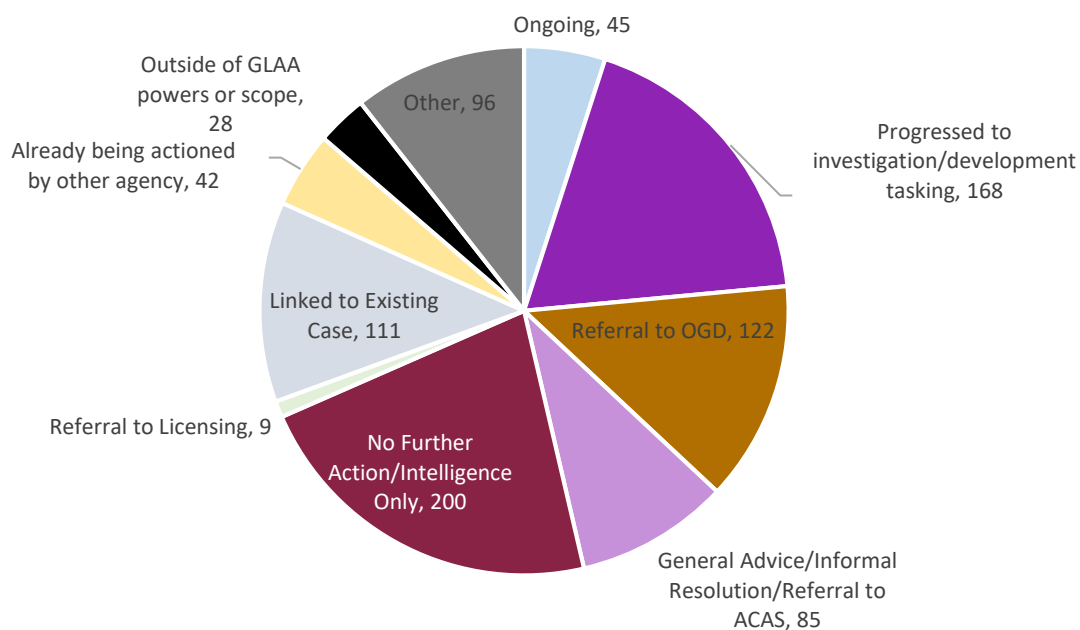|	Q2 2019-20		Q2 2020-21		2020-21 YTD	
Intelligence Reports created	1,001		763		1,573	
GLAA Sector?	Yes	No	Yes	No	Yes	No
	381	620	399	364	826	747
Modern Slavery Indicators	Yes	No	Yes	No	Yes	No
	56	945	40	723	78	1,495

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Actionable Intelligence - Sources
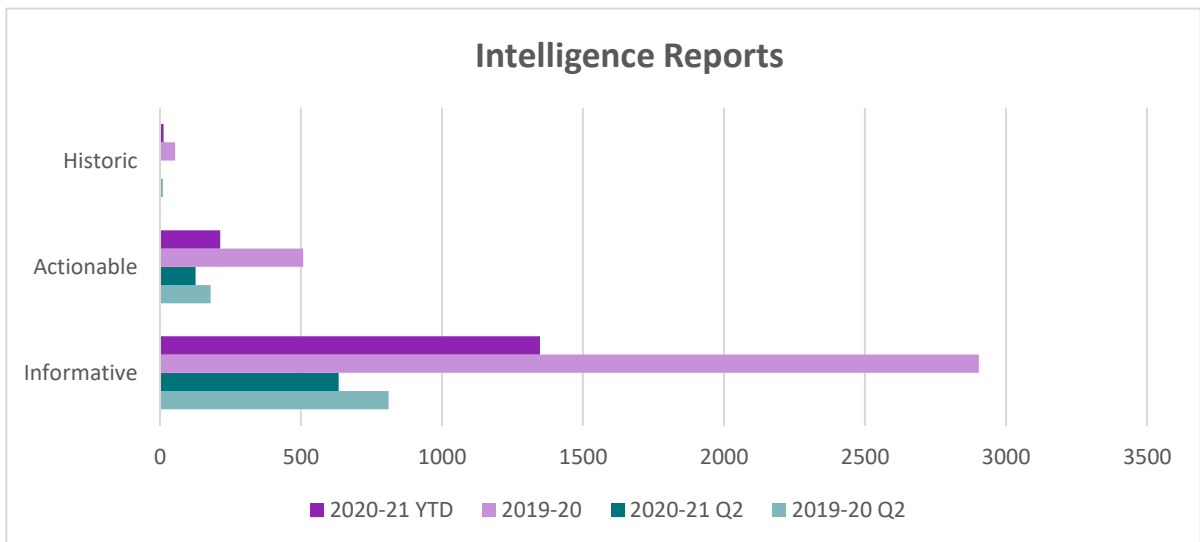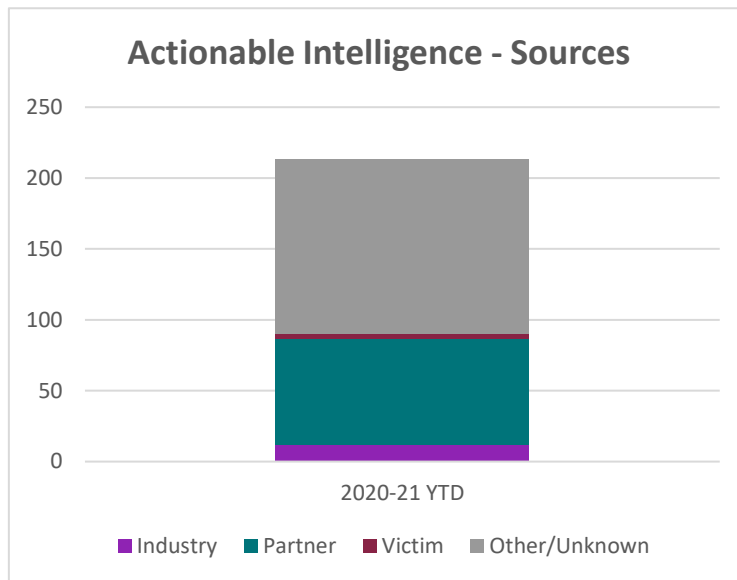
General Issues (referrals)

The number of referrals made to the GLAA regarding potential labour exploitation and modern slavery offences has increased year on year since the GLAA obtained new powers in relation to the wider labour market in 2017 from 466 in 2016-17, to 1,825 in 2017-18, to 2,740 in 2018-19 and 2,741 in 2019-20. This however has decreased in Q1 and Q2 compared to previous quarters. In Q1, this was attributable to UK lockdown measures following the outbreak of covid-19, which has involved many businesses and premises temporarily closing, therefore reducing in some instances the identification and reporting of labour exploitation.

Action taken on General Issues 20-21 YTD

Pie chart — Action taken on General Issues 20-21 YTD:
- Ongoing, 45
- Progressed to investigation/development tasking, 168
- Referral to OGD, 122
- General Advice/Informal Resolution/Referral to ACAS, 85
- No Further Action/Intelligence Only, 200
- Referral to Licensing, 9
- Linked to Existing Case, 111
- Already being actioned by other agency, 42
- Outside of GLAA powers or scope, 28
- Other, 96

	20-21 YTD Total	2019-20 Q1 & Q2	Change
Created	906	1,521	40% ↓

Identification and support of victims

	2018-19 Total	2019-20 Total	2020-21 YTD Total	Forecast % change
Potential victims of labour exploitation/licensing breaches identified	7,396	15,186	3,755	51% ↓
Number of NRM Referrals made by the GLAA	33 (plus 13 assists)	7 (plus 23 assists)	2 (plus 1 assist)	87% ↓
Number of MS1 forms submitted by the GLAA	34 (plus 19 assists)	55 (plus 20 assists)	82 (all GLAA)	119% ↑

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

There has been a significant increase in the number of MS1 forms submitted this financial year. One ongoing case (2157) involved 68 MS1 referrals being input in April 2020 relating to 67 Romanian and 1 Bulgarian workers in the agriculture sector over an extended period of time, which alone has almost matched the total of the previous year.

% of potential victims of modern slavery or human trafficking identified that result in an NRM or MS1 – Q2 2020-21			
Potential victims of MSHT identified	NRMs made	MS1 forms submitted	% resulting in NRM or MS1
737	1	7 (all GLAA)	1.09%

Tier 1 intervention

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

Tier 1 Resolutions	Tier 1 Resolutions
2019-20	**2020-21 YTD**
39 resolutions (26 intelligence team, 13 enforcement/compliance teams)	16 resolutions (9 in intel, 7 in enforcement/compliance)
2,374 workers affected	638 workers affected
Withheld wages = £2,298.49 Holiday pay = £92,329.51 Both = £46,492.03 A further £25,485.27 relates to other recoveries, such as refunded PPE payments, and non-regulated sector recoveries such as unpaid overtime.	Withheld wages = £1271.40 Holiday pay = £3,958.41 Both = £0 A further £1,918.24 relates to other recoveries, made in the wider labour market, not relating to GLAA licensed labour providers and therefore not involving a breached licensing standard.

Resolutions which occur for workers working outside of GLAA-regulated sectors, but with GLAA-licensed agencies, are also included in these figures. Overall, in 2018-19, £94,769.49 was recovered, £166,605.30 was recovered in 2019-20, and £7,148.05 has been recovered so far in 2020-21.

Pursue

Enforcement operations

	2019-20	2020-21 YTD	% forecast change from 19-20
Enforcement cases tasked	268	91	**32%** ⬇
Non-standard operations (NSO)	82	35	**15%** ⬇

Following on from a large increase in enforcement cases in 2018-19 compared to the previous year, the total amount of cases of this nature levelled out somewhat in 2019-20, with just an 8.5% increase when compared to 2018-19. The number of cases tasked this financial year is an area which has been impacted by the implementation of lockdown measures across the UK following the outbreak of covid-19, in particular into those cases which feature visits to premises which were closed, such as car washes, hotels and restaurants. A total of 60 enforcement and NSO cases were tasked in Q1, followed by 66 in Q2. This indicates that operational activity is starting to increase again as restrictions are eased.

36% (24) of the cases tasked in Q2 of 2020-21 had indicators of modern slavery/human trafficking.

Cases and Intelligence Reports with MSHT indicators 2020-21 YTD
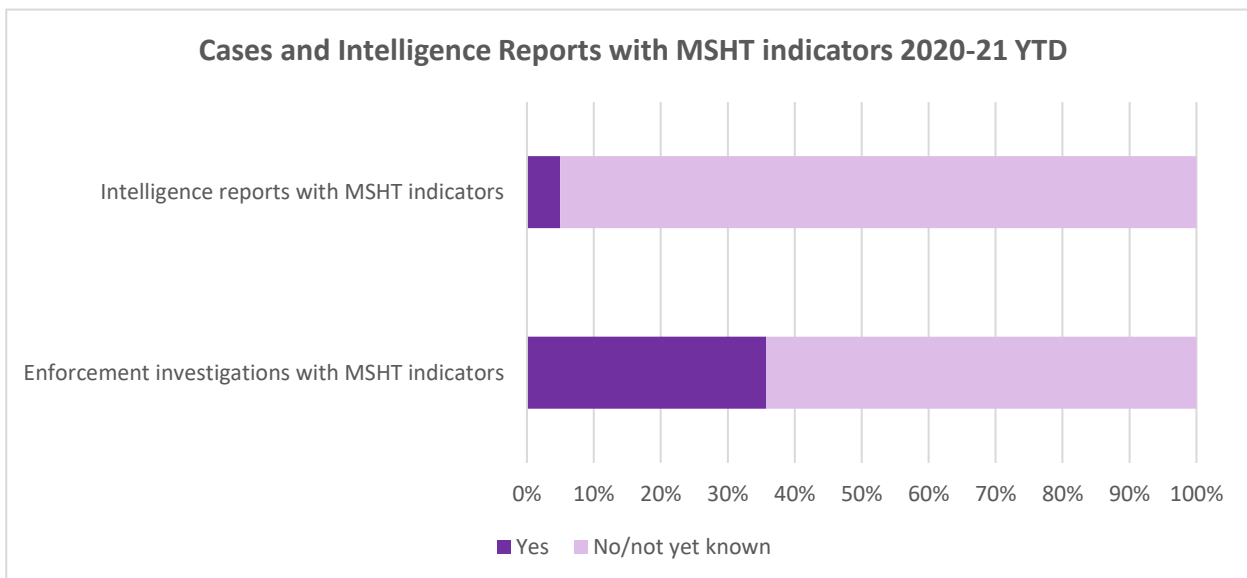
95% (1,495) of intelligence reports recorded this financial year have no indicators of modern slavery or human trafficking at the time of receipt, which could indicate that these factors may not have become apparent or be identified until further development or corroboration takes place. It is also possible that the indicators may not become apparent

until an investigation commences. It is important to recognise that the GLAA receives large quantities of intelligence from partner agencies which do not relate to labour market offences, and instead consists of address, employment and vehicle details linked to subjects, and are often historic or informative, with no explicit indicators of modern slavery.

Arrests and Warrants
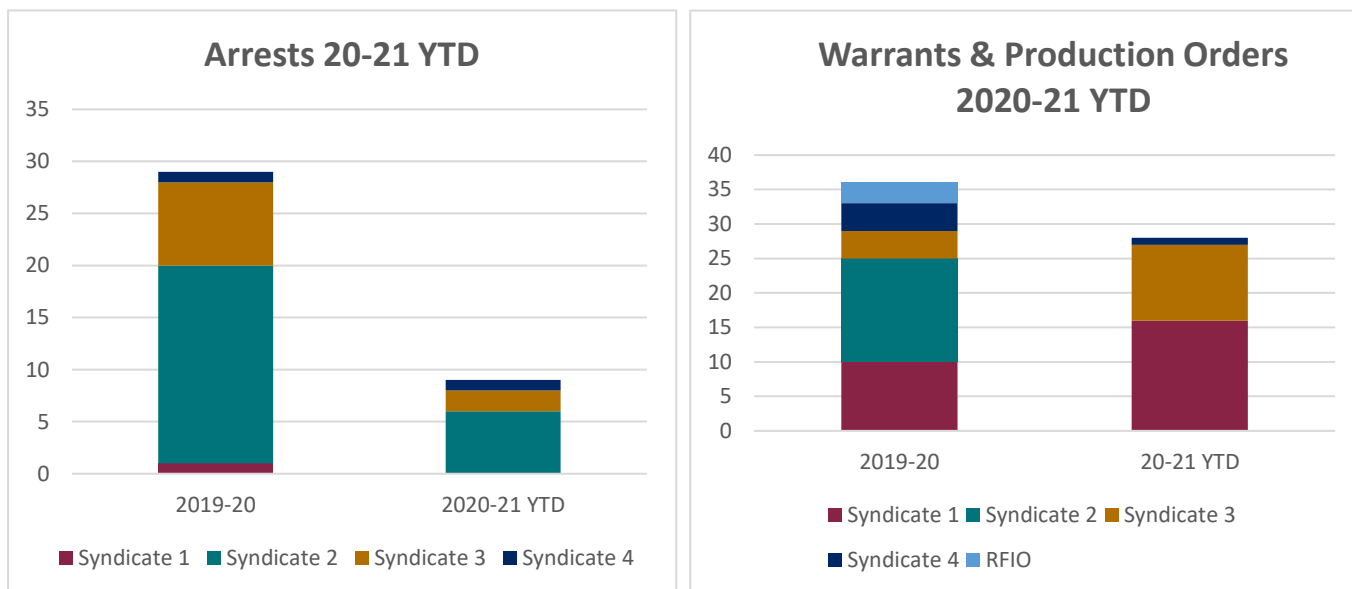
The above graphs include arrests made by the GLAA, or by partner agencies in investigations supported by the GLAA. Just 1 arrest was made by the GLAA in Q1 of 2020-21 which was in part due to the outbreak of covid-19 which has delayed the arrest phase of some investigations. 6 arrests were made by a partner agency of which the GLAA supported, all of which related to potential modern slavery and human trafficking offences. In Q2, 3 arrests in total were made. It is also commonplace that suspects may agree to be voluntarily interviewed under caution, negating the need for an arrest. This occurred with a further 4 persons in Q2.

The impact of covid-19 has meant that trial dates which were due to take place in Q1, relating to charges under both the Modern Slavery Act (2015) and Gangmasters Licensing Act (2004), have been delayed into later months in the year. One such case has been moved from May 2020 to January 2021, and another being charged in August 2020 with a trial date in October 2021.

Closed Investigations

	2020-21 YTD Enforcement case closures				
	Syndicate 1	Syndicate 2	Syndicate 3	Syndicate 4	Total
Convictions	0	0	0	0	**0**
Warnings	0	0	1	7	**8**
Enforcement Notices	0	0	4	0	**4**
LMEU	1	0	1	1	**3**
LMEO	0	0	0	0	**0**
STRO	2	0	0	0	**2**

Glossary of Terms

GLAA	Gangmasters and Labour Abuse Authority
AI	Application Inspection
ALC	Additional Licensing Conditions
CARD	Crimson Allocation Record Sheet
CI	Compliance Inspection
CNB	Compliance- New Business Inspection
CPA	Change of PA Inspection
Crimson	Case Management System
ENF	Enforcement Tasking
ENRS	Enforcement Tasking – Non-Regulated Sector
ERS	Enforcement Tasking – Regulated Sector
General Issue	Record of referrals to the GLAA
iBase	The GLAA Intelligence Database
LAWS	The GLAA Licensing Database
MS1	Duty to Notify the Home Office when a potential victim of modern slavery is identified & does not consent to the NRM
MSHT	Modern Slavery/Human Trafficking
NFA	No Further Action
NRM	National Referral Mechanism
NSO	Non-Standard Operation
NTT	Non-Triaged Tasking
OCDA	Office for Communications Data Authorisations
OCG	Organised Crime Group
POCA	Proceeds of Crime Act
RIPA	Regulation of Investigatory Powers Act 2000
SIO	Senior Investigating Officer
SPoC	Single Point of Contact
Syndicate 1	North-East
Syndicate 2	South-East
Syndicate 3	South-West
Syndicate 4	North-West
Tier 1	Monetary or Non-Monetary Resolution for Worker
YTD	Year to Date