



Gangmasters & Labour Abuse Authority

GLAA 72nd Board meeting

27 January 2021

Time 10:00

Skype/Zoom

Chair Margaret Beels **Secretary** Jennifer Clarke (JC)

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

Ex officio attendee

Ziggy MacDonald (ZM) Chief Executive (interim)

In attendance

Paul Coffey (PC) Head of Communications and Engagement
Emma Coxon (EC) Head of People & Change
Darryl Dixon (DD) Head of Single Enforcement Body Programme
Frank Hanson (FH) Head of Prevent and Partnerships
Samantha Ireland (SI) Head of Governance
Nicola Ray (NR) Head of Regulation
Dan Scully (DS) Director of Resources
Justin Rumball (JJR) Head of Business & Finance
Jane Walker (JW) Risk & Information Assurance Manager/DPO
Ian Waterfield (IW) Head of Enforcement

Home Office attendees

Simon Hookins
Elinor Howard
Rebecca Kirby
Amy Medrano

1	<p>Welcome</p> <ul style="list-style-type: none"> • The Chair welcomed members of the Board, Leadership Team and Home Office (HO) colleagues to the meeting. • The Board paused to remember those who have lost their lives through COVID-19 as the death toll in the UK now exceeds 100,000. • MB thanked the Executive for its commitment during the pandemic to continue to focus on the GLAA's mission – working in partnership to protect vulnerable and exploited workers.
2	<p>Apologies</p> <ul style="list-style-type: none"> • None.
3	<p>Minutes of the previous meetings</p> <ul style="list-style-type: none"> • The minutes of the meetings held on 4 November 2020 were agreed as an accurate record.
4	<p>Declarations of Interest</p> <ul style="list-style-type: none"> • None.

5	<p>Action points</p> <p>Action points closed since 4 November 2020 Board meeting</p> <ul style="list-style-type: none"> • BM52(1) (16) (23) • BM54 (2) (3) (4) (5) (6) (7) (8) (9) (10) (13) (14) (15) (16) (18) (20) (21) (22) <p>Action points closed at 27 January 2021 Board meeting</p> <ul style="list-style-type: none"> • BM49(6) BM51(12) BM52(7) BM54(11) BM54(17) BM54(19) BM54(24) <p>Action points carried forward from previous meetings</p> <ul style="list-style-type: none"> • BM51(17) Lessons Learned exercise relating to the new structure.EC/MB • BM51(21) CEO to present action plan to ARC in September. Action plan was signed off by NAO and GIAA on 11 December. ZM to follow up with NAO the reassurance given on one action point. ARC to inform Board once all actions have been completed to their satisfaction. ZM/BB • BM52(4) DS/IW are feeding into a lessons learned paper being prepared by BEIS, leading to a bigger piece of work. (Need for separate report to Board discussed at agenda item 12). • BM52(11) Stakeholder engagement cost benefit – initial discussion held between LD & FH. FH/PC • BM52(13) Re energise stakeholder engagement with the lu/lp meetings – progress being made and useful further discussions taking place. FH/MC/PC/SM • BM52(19) lessons learned temporary Licensing scheme – discussion with HO colleagues to consider what amendments might be helpful in anticipation of the SEB, in addition to using the SI to tidy up the rules. Governance processes followed when scheme was launched still for review. DS to check that the Gold audit covers the temporary licensing scheme. • BM52(25) Governance boards - further TORs to be added to Morecambe. Further TORs pending the decision to reform RIGG. TORS to be developed for the new Risk, Performance and Governance group and post on Morecambe. SI • BM53(3) Inform the Board of the Government response to the SEB Consultation – awaiting publication. DD • BM54(1) Action owners of deep dives to provide ARC with a note of actions. Paper prepared for the next meeting of ARC. FH/ISW • BM54(6) Discuss the NRM national picture with HO statisticians. Initial conversations have taken place. IW • BM54(12) Present results of the consultation to the Board at its meeting on 28.04.21.NR • BM54(23) GIAA meeting scheduled with SI.
6	<p>Declaration of urgent business</p> <ul style="list-style-type: none"> • None

Performance & Risk

a) Q3 October - December 2020

- The Board noted the performance report for the period October – December 2020.
- SI introduced the new report, highlighting the changes and the reasons for this.

Objective 1 – Identify and support victims of labour exploitation

- A discussion prompted by the slide narrative took place regarding comparators on NRM referrals.
- MB suggested that all GLAA colleagues consider and record how they have assisted vulnerable workers. Victim support in its broadest sense might be a deep dive topic.

Action

- **BM55(1) IW/RK** to discuss how the GLAA is giving appropriate support to victims.
- **BM55(2)** Develop into a deep dive discussion how victim support contributes to the mission of the organisation. **PC/IW**
- **BM55(3)** Develop terms of reference for deep dive on victims to include HO colleagues. **SI**

Objective 2 - Maintain a credible licensing scheme

- All outstanding licensing decisions are currently being reviewed.
- Discussion took place around resources in the licensing team and if additional support could be given from other areas of the organisation.
- Whilst the cost per inspection had been added to the report in future it would be useful to have an explanation of how the figure had been calculated.

Action

- **BM55(4)** Consider using median (rather than average) values for objectives with a wide range in the next report. **SI**
- **BM55(5)** Provide an explanation of how cost figures on the report have been derived. **SI**

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

- The Rights Lab have been awarded £48k to undertake research aimed at assessing impact of COVID-19 on Romanian seasonal labour migrants. Research bid supported by the GLAA.
- The HO has awarded the GLAA £55K to progress the national qualification in employment rights and preventing labour exploitation and to progress the piloting of the Responsible Car Wash Scheme.
- The use of social media in support of the GLAA mission was discussed.

Action

- **BM55(6)** Report on how use of social media in support of the GLAA mission might be expanded with front line staff **PC**

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

- The Board noted the summary of the Operation Tacit activity.
- It was noted that due to the lack of courts capacity no convictions were expected this year.

Action

- **BM55(7)** Provide JM & RK tangible examples of significant delays due to systemic judicial issues/ processes with CPS. **IW**

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

- The Board noted the data on absence, staff turnover, ethnicity and types of Health and Safety incident.
- EC has approached the HO for comparative data.

	<p>Objective 6 - Provide efficient and effective services, sound governance, robust risk management and value for money</p> <ul style="list-style-type: none"> • JJR reported an underspend this year which is COVID-19 related. • Regular meetings with internal audit have been scheduled, the audit actions being managed through risk, performance and governance meetings. <p>Action BM55(8) Consider changing the order in which the objectives are discussed at each meeting. SI</p>
	<p>b) Action Plan for Strategic Objective 2</p> <ul style="list-style-type: none"> • A review of the performance data identified data quality issues which have now been rectified. • It has been identified that methodology as regards duration of inspections had changed as between 2019/20 and 2020/21 and so the targets have been reset to reflect this. • The action plan is now in place. It was requested that timescales be added to this. • Proactive management and ownership of cases is in progress with Licensing and Compliance now working together to address issues. <p>Action BM55(9) Add timescales to the action plan NR BM55(10) The Executive to reflect on the observations of the Board and update action plan. ZM/NR</p>
	<p>c) Risk Management</p> <ul style="list-style-type: none"> • Currently there are 11 risks on the Risk Register and 4 issues on the Issues Log. The Board noted the updates to Register and the Log. • The Board noted the intention to undertake a risk maturity model assessment. The outcome of this will establish what further work may be required to increase confidence in various elements of the risk management framework. • IW informed the Board of the risk mitigation currently in place around Personal Safety training (PST) which LAPOs are mandated to undertake. Due to COVID-19 restrictions the PST course scheduled to take place on 27 January 2021, delivered by Leicestershire Police, was cancelled. This has resulted in three LAPOs reaching the limit of their accreditation (already extended in an earlier lockdown) and an up and coming risk of 9 LAPOs in April/May 2021 being out of accreditation. The GLAA are exploring options with other training providers. • The Board noted the concern around the risk and the significant issues. • SM requested that the risk of the loss of critical IT systems be discussed as part of item 7. <p>Action BM55(11) Share note of decision regarding LAPO Personal Safety training impacted by COVID-19 restrictions. DS</p>

9	<p>Finance – current position and budget setting 2021 – 22</p> <ul style="list-style-type: none"> • JJR gave an overview of the current financial position. There is a currently an overall underspend with COVID-19 restrictions being a major factor. • Confirmation of funding for 2021-22 is awaited from the HO, a flat cash settlement is expected. • There will be a structured approach to savings based on a number of reviews in progress and new ways of working. • ZM informed the Board of his decision not to fill the vacant SCS1-equivalent post (Director of Operations). • SA agreed to be the lead Board member to support oversight of budget/savings monitoring. • In year and recurring savings reported back to Board, linked to risk and performance. <p>Action BM55(12) Provide an update on how we're balancing the 2021/22 budget. JJR</p>
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Home Office update

- The Board noted the report provided by the Home Office in advance of the meeting. Home Office attendees provided an update: -
- The Annual Report and Accounts were laid in Parliament on 21 January 2021. EH thanked all those involved in the production of this report.
- Spending review – the budget allocations are expected in the next few weeks.
- Board recruitment – it has been agreed to stagger the approach of recruitment by initially recruiting two board members.
Board members voiced disappointment, that, despite reassurances from HO colleagues after the last round of recruitment, the Board member recruitment had again fallen behind schedule.
- Each retiring board member will be contacted by HO.
- Chair recruitment – the Minister is considering separate advice on the recruitment of a Chair. It was hoped that recruitment would commence as soon as possible. MB added as this appointment was subject to the scrutiny by Parliament through the Home Affairs Committee there was a risk of it drifting into autumn if it had not been heard before the summer recess.
- WB that added that there remains a risk around continuity/uncertainty of governance and requested that this should be flagged in the risk register. The risk needs to be managed going forward as well as personal decisions.
- The CEO recruitment is on track. Interviews will take place on 19 February with advice being sent to the ministers following a special Board meeting on 24 February.
- It was noted that agreement has been made to extend the contract of the current interim CEO by two months till the end of June.
- The significant IT issues on critical systems were brought to the attention of HO colleagues. Discussion took place around the need for an adequate service agreement.
- The GLAA is still carrying the risk around the issue of accessing folders on the shared drives. Mitigations have been put in place. It was agreed this should be discussed at the next Senior Sponsorship meeting.

Modern Slavery Victim Care Contract (MSVCC)

- Amy Merdano, HO provided an update on the MSVCC which went live on 4 January 2021.
- The new contract builds on wide-ranging support provided through the previous victim care contract to deliver a service that is needs-based and better aligned to the requirements of individual victims in England and Wales.
- It adds greater prescription to existing services and introduces a number of new services to better the needs of each victim, including those with specialist or complex needs.
- MB enquired about the level of resourcing with the Salvation Army and if measures were in place by HO to ensure it is properly resourced.
- RK gave assurances that measures and an inspection regime are in place. IW is the GLAA key link.

Action

BM55(13) Check the position with HO IT Service & the GLAA service level agreement.

JJR/DS

BM55(14) Discuss at sponsorship meeting 9 March the risk around access to folders. **DS**

10	<p>Governance</p> <ul style="list-style-type: none"> • The Board noted the paper outlining the priorities for governance within the GLAA. • The focus for governance is on Risk and Assurance with performance, risk and cost being more closely aligned. • SI provided an overview of the planned approach and methodology which includes using a system of “trip wires” that trigger attention when parameters fall outside of an agreed range. • The process will strengthen first and second line assurances which have previously been identified as a weakness by the GIAA. • Development of a scheme of delegation to improve our assurance framework is in place. • It is planned to replace the RIGG with a new Risk, Performance and Governance group. <p>Action BM55(15) Identify by whom and how the “trip wires” are set. SI BM55(16) provide an update on the Governance Action plan at the April Board meeting. SI/JJR BM55(17) Provide Governance update at the April Board meeting. SI</p>
11	<p>Strategic Planning</p>
	<p>a) Strategic Plan 2021-24 and Business Plan 2021-22</p> <ul style="list-style-type: none"> • The Board noted the report which outlined the update to the current 3-year strategic plan and presented the business plan for 2021-22. • It was noted that the wording on the strategic plan for objectives 2 & 5 have been changed. • The Business plan objectives have been developed in consultation with the wider GLAA. • SI to review comments on wording already submitted by LD & MB. • It was agreed that the plans should be signed off by the Board - meeting to be scheduled for March. • LT to meet for a further Business planning meeting. <p>Action BM55(18) Establish the process for sign off with the whole Board in March. SI BM55(19) SI to review comments already submitted by LD & MB. SI BM55(20) Schedule a business planning meeting with LT. SI</p>
	<p>b) Draft Performance Framework</p> <ul style="list-style-type: none"> • All objective owners have developed new measures. • In some areas targets are yet to be defined. These will cross reference with the Business Plan objectives once agreed by the Board.

12	<p>Reflections on Operation Tacit (Leicester)</p> <ul style="list-style-type: none"> • DS provided an update on Op Tacit. The taskforce was formed in August 2020. • 175 factory visits have been made, 160 of which were led by the GLAA. • The findings in these visits mainly related to National Minimum Wage offences and Health & Safety issues. DS added that the GLAA have not found Modern Slavery issues in Leicester during Op Tacit. • The organisation remains a key partner in Leicester County Council's community engagement strategy and there has been an upturn in contact from workers to the GLAA, and better engagement with brands and their auditors and greater willingness to put whistle blowing policies in place. • Discussion took place around resourcing the operation and the exit plan. • MB asked how the GLAA will record in a formal sense its lessons learned. <p>Action BM55(21) Produce a Lessons Learned document from Op Tacit. DS</p>
13/14	<p>Single Enforcement Body (SEB) /DLME Strategy recommendations/Immigration GLAA preparedness for the new immigration rules.</p> <ul style="list-style-type: none"> • The presentation covered the latest DLME Strategy themes planned for the work on the 2021-22 strategy and their links to monitoring the impact on the immigration rules on the labour market and thoughts on the development of the SEB. • DD gave an update on the SEB. The ministerial decision is still awaited which impacts planning. • The executive will ensure appropriate activities as set out in the paper covering the DLME recommendations from the 2019-20 strategy and the draft 2020- 21 recommendations are covered appropriately in ongoing business planning activity.
15	<p>Stakeholder Engagement – update</p> <ul style="list-style-type: none"> • The Board noted the report providing an overview of the key stakeholder engagement activity during the previous quarter. • Meetings of the Labour Provider/Labour User and Worker/NGO Liaison group took place on 26 November and 1 December respectively. Both of these online meetings used the GoToWebinar platform. • A 12-month webinar programme is currently being developed. • Work is underway to review and update the Stakeholder tactical plan (to include International partnerships). • The Partnership Bulletin published in November was emailed to in excess of 1,300 subscribers. • A prevent action plan is being developed, PW agreed to assist.
16	<p>Audit and Risk Committee - Chair's report</p> <ul style="list-style-type: none"> • The Committee's meeting in January had to be postponed due to IT issues. The date of the next meeting is scheduled for 17 February 2021.

17	<p>Remuneration Committee - Chair's report</p> <ul style="list-style-type: none"> The Board noted the report of the Remco meetings held on 30 November 2020 and 13 January 2021. <p>CEO appointment</p> <ul style="list-style-type: none"> Remco has continued to act as a sounding board in relation to the ongoing process for appointing a new CEO (e.g. on composition and format of the panel for stakeholder engagement). <p>Policies</p> <ul style="list-style-type: none"> It was noted that the HR policy approval flow chart has been agreed Policies approved - Variation of Duty, HR Privacy Policy, Pay & Reward and changes suggested to the H&S Policy have been noted. The Equality Diversity and Inclusion policy is scheduled as a priority for a review and revision. The requested revision of Dignity at Work statement and Grievance Policy be put back to April given other demands on HR.
18	<p>Launch of Review of Board Performance</p> <ul style="list-style-type: none"> Noting the recommendation in the GIAA audit on Corporate Governance, the Board discussed whether to engage an external assessor to evaluate the Board's 2020-21 performance. The recommendation was that this should be done every three years. The Board felt that internal evaluation was appropriate for this year. The proposed approach to the evaluation of the GLAA Board performance during 2020-21 was agreed and board members were invited to comment on the proposed questions. The evaluation will be for board members and GLAA colleagues who attend Board meetings. The survey will be carried out via Survey Monkey and the results will be provided for discussion at the April meeting of the Board. It was agreed that Board Committees should also evaluate their performance. Proposed approach to be discussed by Chair and CEO. <p>Action</p> <p>BM55(22) Review the performance evaluation for Board Committees and the process for taking this forward MB/ZM</p> <p>BM55(23) Observations on the existing questions for the main Board should be sent to MB/ZM by 5 February.</p>
19	<p>Anti-Bribery Policy for Board members</p> <ul style="list-style-type: none"> It was noted that the policy was under review which is scheduled for completion in April. Board members will be asked to make their annual declaration against the existing policy. When the new policy becomes available this will be circulated to Board members. <p>Action</p> <p>BM55(24) Request the annual declaration of the Anti-bribery policy for Board members. JC</p>
20	<p>Any other business</p> <ul style="list-style-type: none"> None.
21	<p>Close</p>
22	<p>Date of next meeting 28 April 2021.</p>