



Gangmasters &  
Labour Abuse Authority

# GLAA LU/LP Group meeting 17 June 2021

Working in partnership to protect vulnerable and exploited workers

# How to take part in the webinar

- If you're watching on a PC, laptop or Mac you'll have a control panel like this one.



# Questions

We will try to answer as many of your questions as possible throughout the session. To allow us to do this, we would ask as a courtesy that you ask your question just once.





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# Welcome and Introductions

## Suzanne McCarthy, Chair and GLAA Board member

Working in partnership to protect vulnerable and exploited workers

# Agenda

1. Welcome and introductions – Suzanne McCarthy
2. Minutes of 26 November 2020 meeting and Joint Liaison Group meeting of 2 March 2021 – Suzanne McCarthy
3. Matters arising from previous meetings – Suzanne McCarthy
  - Approval of the Group's Terms of Reference
4. Update on GLAA Performance – Head of Governance, Samantha Ireland
5. Compliance Strategy Update and questions on GLASS – Head of Regulation, Nicola Ray
6. Update on compliance and the intelligence picture – Senior Compliance Officer, Martin Jones and Head of Intelligence, Ian Walker.



7. Update on the Single Enforcement Body – Head of the SEB Programme, Darryl Dixon
8. University of Nottingham – Update on research on labour supply issues. Dr Akilah Jardine
9. Report on worker rights and preventing labour exploitation’ qualification, Head of Prevention and Partnerships, Frank Hanson (5 minutes)
10. ALP’s response to Operation Fort and the Labour Provider Compliance Maturity Framework. David Camp (10 minutes)
11. A.O.B
12. Date of next meeting – 14 September 2021





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# Minutes and matters arising from previous meetings

Suzanne McCarthy, Chair and GLAA  
Board member

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# Performance Report 2020-21

**Samantha Ireland**  
**Head of Governance**

<p><b>Identify and support victims of labour exploitation</b></p> <ul style="list-style-type: none"> <li>• Number of victims below target</li> <li>• NRM referrals low</li> <li>• Target exceeded on MS1 referrals</li> </ul>		<p><b>Disrupt and deter criminal activity within the labour market</b></p> <ul style="list-style-type: none"> <li>• GLAA led investigations is on target</li> <li>• GLAA investigations in partnership is slightly under target</li> <li>• Prosecutions, warning and notices impacted by Covid</li> <li>• Successfully obtained first STRO</li> </ul>	
<p><b>Maintain a credible licensing scheme</b></p> <ul style="list-style-type: none"> <li>• Average days for inspections is over target</li> <li>• Targeted work has been carried on obj 2 data</li> <li>• YTD average days for inspections shows improvement</li> </ul>		<p><b>Develop our people and culture in line with the GLAA's values, ensuring a diverse, resilient and change-ready organisation</b></p> <ul style="list-style-type: none"> <li>• Absence and turnover rates below benchmark</li> <li>• Progress made against ethnicity reporting</li> <li>• New PDR and PDP process</li> <li>• Mental health first aider cohort significantly increased</li> <li>• Increase in people declaring ethnicity</li> </ul>	
<p><b>Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation</b></p> <ul style="list-style-type: none"> <li>• Successful construction and LU/LP webinars</li> <li>• MSPEC award rights lab £48k for research into Romanian workers</li> <li>• £55k awarded to GLAA for prevention initiatives</li> <li>• Increased volume and breadth of audience reach online</li> </ul>		<p><b>Provide efficient and effective services, sound governance, robust risk management and value for money</b></p> <ul style="list-style-type: none"> <li>• Assurance rating remains at limited</li> <li>• Progress against audit actions</li> <li>• Risk maturity assessed as developing</li> </ul>	

<p>Under target </p>	<p>Progress made </p>	<p>Targets mostly met </p>	<p>Targets met/exceeded </p>
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# Month 1 Summary

- The majority of victims identified have been suffering financial abuse and there are currently nearly 300 investigations ongoing. Whilst there are delays with CPS, the GLAA have issued 17 warning and enforcement notices.
- Average working days to complete AI's (80) and CI's (149) is above target of 65 days and 155 days respectively
- 2 licences have been granted with ALC's and 2 appeals have been upheld
- GLAA engagement rate through social media remains strong, particularly through Linked in and Facebook
- The GLAA have published a Know Your Rights podcast to help workers understand their rights and prevent labour exploitation
- Staff sickness and turnover rates remain low





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# Compliance Strategy

**Nicola Ray**  
**Head of Regulation**

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# Compliance Strategy

- Thanks for all the responses
- Board reviewed the response to the consultation and wanted more clarity on the issue around the scope of licensing
- Response and strategy to be signed-off at July Board



# Compliance Strategy

- What will be different for business?
  - **Listen to workers and take action**
  - **Conduct virtual application inspections**
  - **Have a greater focus on compliance inspections by prioritising investigator resources**
  - **Inspections triggered by a risk-based approach with a commitment to review all licence-holders**
  - **More compliance activity using other tools such as awareness visits, tier 1 informal resolution of issues, thematic reviews, unannounced spot checks, days of action**



# Compliance Strategy

- **Helping licence-holders to show us they are compliant through the use of training**
- **Better response rates for our activities**
- **Provide more guidance to applicants and licence-holders so they understand the approach the GLAA will be taking when assessing compliance with the Licensing Standards**



# Compliance Strategy

- Next Steps:
  - We will be seeking feedback from our customers through this meeting on how we are doing
  - We will be reviewing the strategy annually to ensure it reflects our strategic and business plans and any recommendations from the Director of Labour Market Enforcement



# GLASS

- Went “Live” on 11 May 2021 for our customers
- Licence-holders were asked to register on the system
- New active check system but need to register to access the system
- New way of doing renewals - [GLAA Brief 70 - New GLAA renewal process – GLAA](#)
- Questions?





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# Compliance

## Martin Jones

### Senior Compliance Officer

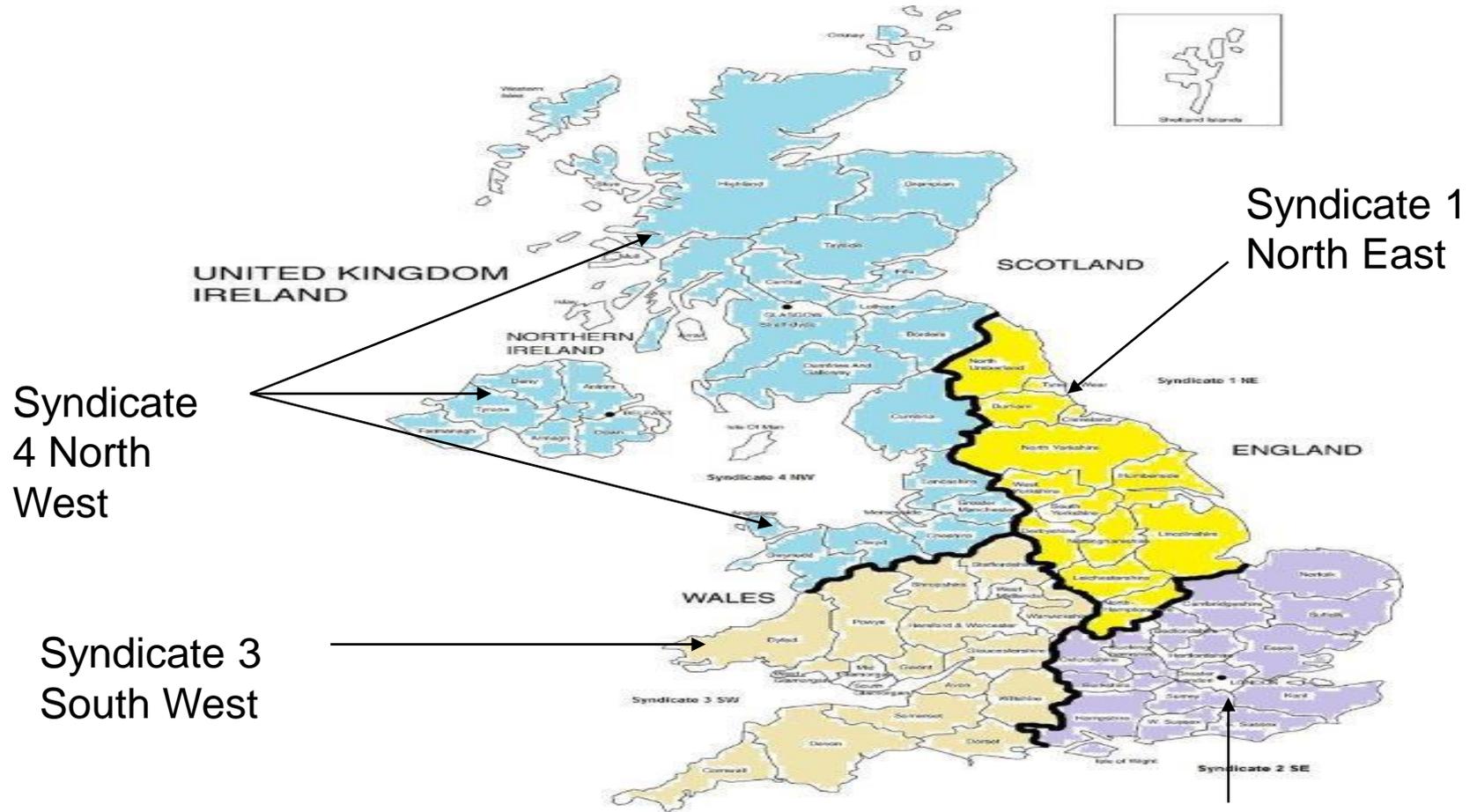
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# Compliance Team

- Head of Regulation/Senior Compliance Officer
- 12 Home Based Investigation Officers includes 3 x part time officers
- UK remit



# How we are spread



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# Compliance Functions

- Application Inspections
- Compliance Inspections includes CPA, CNB
- Presentation & Awareness Work
- Multi Agency Operational Work
- Some Enforcement
- Support Syndicates



# Compliance Inspection Activity

- Compliance Inspection Activity April 20– March 21

	North East	South East	South West	North West	Scotland	N Ireland	Over Seas	Total
Application Inspection	38	75	38	18	7	3	3	182
Compliance Inspection	16	12	6	3	2	2	2	43
Change of PA	14	12	6	4	0	0	0	36

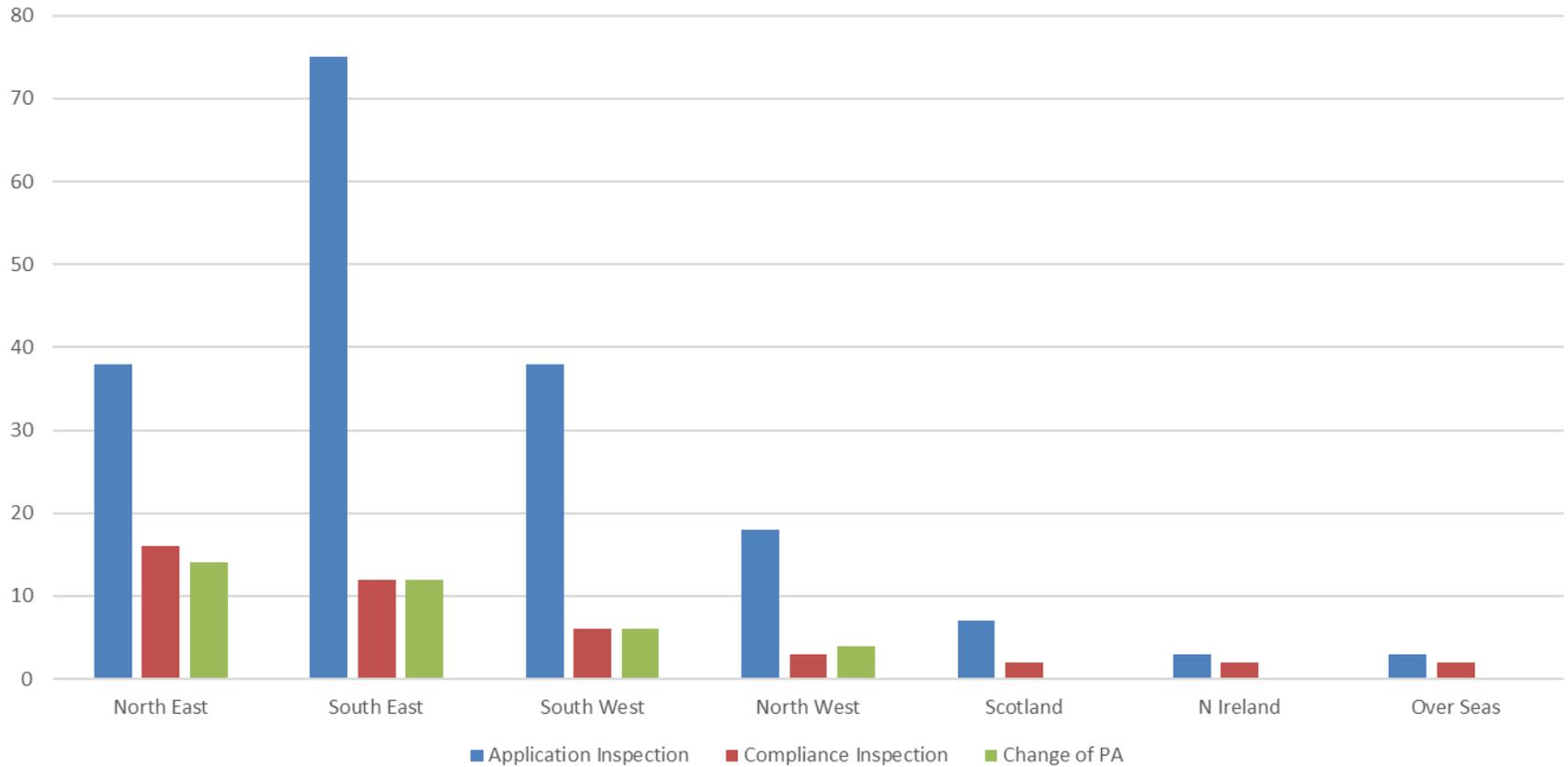
- Compliance Inspection Activity April 19 – March 20

	North East	South East	South West	North West	Scotland	N Ireland	Over Seas	Total
Application Inspection	28	43	31	11	2	1	3	119
Compliance Inspection	14	23	15	6	3	2	1	64
Change of PA	5	14	6	3	1	1	0	30



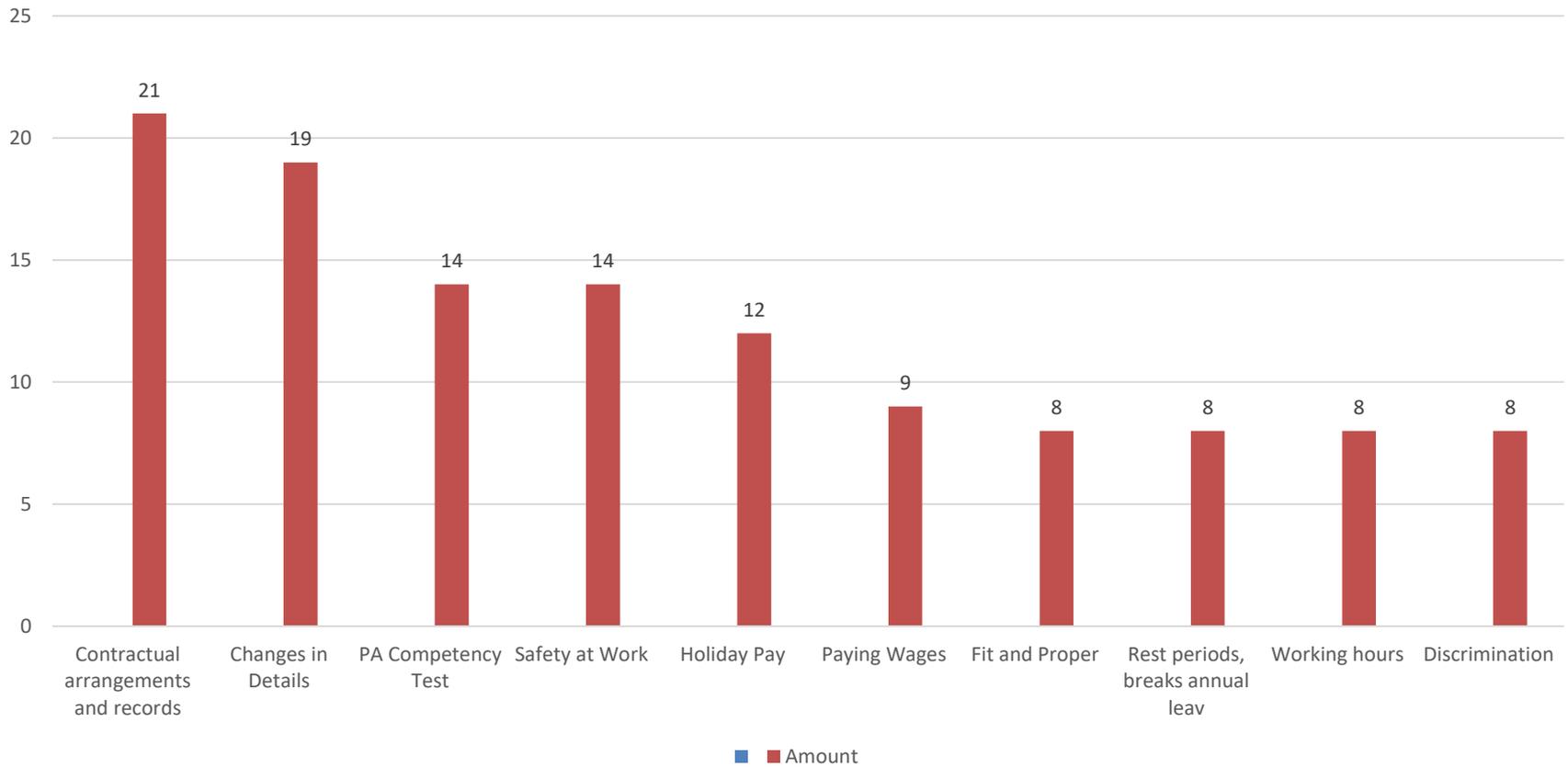
# Areas Where Inspections Occur

Geographical Chart of Inspections



# Potential Licensing Breaches

Investigators identification of Potential LS Breaches





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# Update on the Single Enforcement Body

Darryl Dixon, GLAA Head of the  
Single Enforcement Body programme

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# University of Nottingham – Update on research on labour issues

## Dr Akilah Jardine

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University of  
**Nottingham**  
Rights Lab

# Disposable workers? Experiences of work in road freight transport and warehousing

Dr Akilah Jardine

The Rights Lab, University of Nottingham



@AkilahJardine



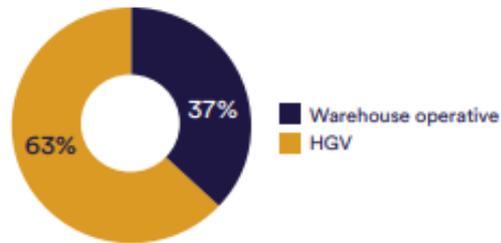
@rightsbeacon

- Seed-corn research funded by the Chartered Institute of Logistics and Transport UK
- Set out to understand experiences of work in RFT and warehousing
- Explored impact of the Covid-19 pandemic on workers
- Captures perspectives on driver shortage in the UK
- 16 semi-structured interviews and over 500 forum posts analysed
- Makes recommendations targeted at 5 stakeholders

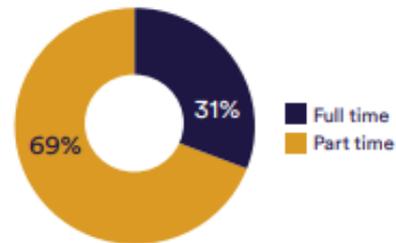


# Profile of participants

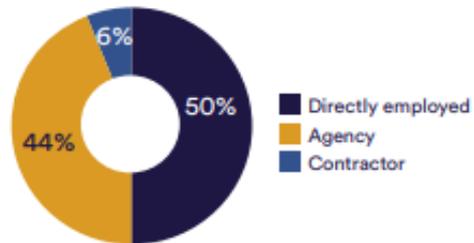
### Occupation



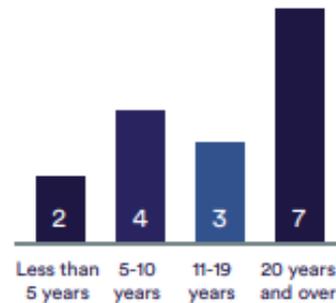
### Employment contract



### Employment type



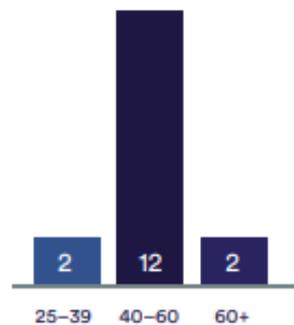
### Number of years in the sector



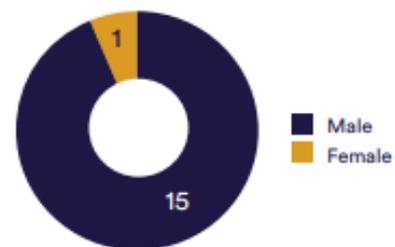


# Profile of participants

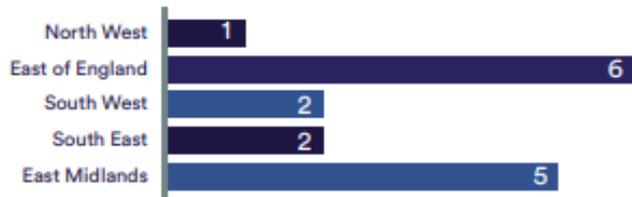
Age



Gender



Location





University of  
Nottingham

UK | CHINA | MALAYSIA

# Findings



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**Nottingham**  
Rights Lab

# Relationship with management



# 1. Lack of job autonomy

“ [They] are preferring to take people from the bottom with poor education, with poor skills, because they’re willing to stay to follow orders, to listen and do whatever they can with no argument, with not your own opinion to asking why, maybe this is a better way, or you don’t have to do this.” (Interview, warehouse worker, agency).

“ [I]t’s the culture within the industry, firstly... is that drivers have their place, they can’t complain, they can’t do anything...” (Interview, HGV driver, agency).

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“ Nobody in this environment likes people who are complaining. You are good to them when you are working and when you are achieving your KPI [key performance indicator] ....once you say that you are having a problem, they put you on a virtual blacklist.” (Interview, warehouse worker, agency).



## 2. Threatening and intimidating behaviour

### a. Surveillance

“ Their transport system is a product and they will go to people...and say, ‘Look we’d like to do your transport for you, you know, you’ve no need to buy any lorries, we’ll do it. But what’s more our drivers they’ve got cameras facing outwards, they’ve got cameras facing down the side of their truck for safety and they’ve got a camera in the cab pointing at them all day, so we can see what they’re doing.’” (Interview, HGV driver, agency).

“ You’re expected to hit a certain rate...There’s a mounted terminal, it tells you your performance, the percentage of your performance and your rate and so on and so forth, so...you[re] constantly... reminded of it on a screen if you’re falling behind what they expect.” (Interview, warehouse worker, directly employed).



### b. Disposable workforce

“ [I]t’s like if you leave they wouldn’t bat an eyelid, they’d have somebody in your shoes the following morning.” (Interview, warehouse worker, directly employed).

“ It’s like it sort of forces drivers to compete amongst themselves and usually a lot of them are offering like very low rates of pay comparatively and sort of a take it or leave it attitude then and, you know if you don’t want to work for this money, we’ll find...other people who do...” (Interview, HGV driver, agency).



### c. General bullying culture

“ [T]here is a certain amount of schadenfreude, which means to take pleasure in someone else’s misery, where you have these incidents are reported in the press and they’re seen as almost mirthful. They’re not quite bad enough to do anything about but it’s like saying ‘driving aren’t allowed umbrellas’, ‘oh look at him, you know, he’s been soaked, you know absolutely soaked out there and he can’t even have an umbrella.’” (Interview, HGV driver, agency).



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Rights Lab

# Workplace pressures



## Workplace pressures

“Some employers will just let you get an infringement and say, “Oh, just carry on, and just write on there you got delayed because of an accident...which is not true...but the problem is if we get stopped by VOSA [Vehicle and Operator Services Agency]<sup>7</sup>, we get fined. We can have our license taken off us.” (Interview, HGV driver, agency).

“Agencies have never asked me to drive illegally but multiple companies have asked me both as an agency worker and as a directly employed worker.” (Discussion forum, HGV driver).

“My feet...the pain was horrible. I couldn't breathe properly. I couldn't stand by early morning when it was 7am, 8am...I still had two hours to go...you had to lift, you had to pull heavy, very heavy [goods] and everything.” (Interview, warehouse worker, agency).



University of  
Nottingham

UK | CHINA | MALAYSIA

**Driver shortage or  
disregard for working  
conditions?**



## Driver shortage

“They’ve been saying there’s a driver shortage for over 20 years. There isn’t a shortage. There’s never been a shortage. They use it keep wages down. If the number of drivers exceed the number of jobs available, this keeps wages low.” (Discussion Forum, HGV driver).

“Now, we’re not 50 thousand drivers short, we’re actually short of 50 thousand people that want to work at minimum wage...But I’m aware anecdotally of a number of people that aren’t driving because they’re just fed up with it.” (Interview, HGV driver, agency).

“There’s a shortage of drivers because industry is living in the past. Look at the way people are treated. People are leaving right away.” (Discussion forum, HGV driver).

“I think the average driver age is something like 55, no young people want to do it no more because the hours long, the pay is poor, you’re never at home. I sleep in this wagon two or three nights a week.” (Interview, HGV driver, directly employed).

“Logistics UK’s Skills and Employment Report, recently suggested that there is now a driver shortage of 76 thousand drivers in the UK.”



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**Thank you!**



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# Report on worker rights and preventing labour exploitation qualification

Frank Hanson,  
GLAA Head of Prevention and  
Partnerships

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# ALP's response to Operation Fort and the Labour Provider Compliance Maturity Framework

David Camp

Working in partnership to protect vulnerable and exploited workers



# **OPERATION FORT**

## **ADDRESSING THE UNDERLYING CAUSES**

**ALP response to the Independent Anti-Slavery  
Commissioner's Call To Action**

OPERATION FORT  
What businesses should learn from the  
UK's largest anti-slavery prosecution  
June 2020

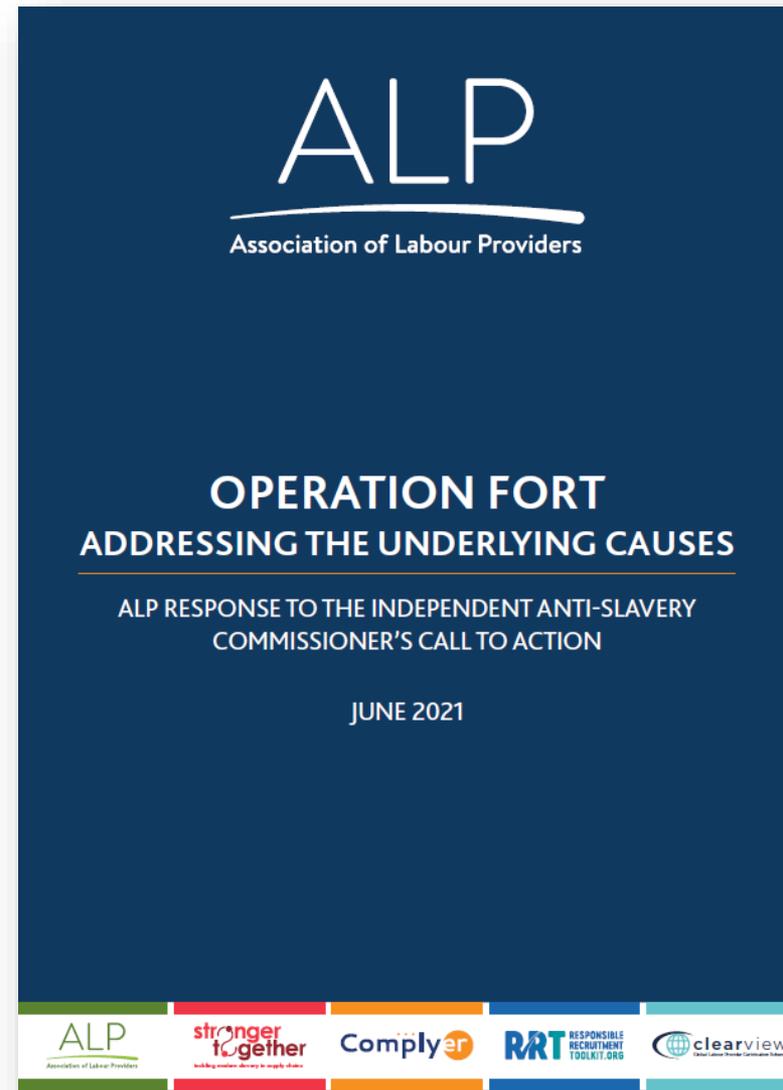
# Operation Fort



- 8 offenders from two Polish OCGs convicted of slavery, trafficking and money laundering offences. Sentences ranged from 3 to 11 years
- 92 potential victims of modern slavery identified; police believe up to 400 in total
- Vulnerable victims trafficked from Poland, forced to live in squalor and work in farms, factories and waste processing plants
- Victims made £20 a week; perpetrators made over £2m
- Traffickers supplied victims to at least 8 established labour providers, in many cases using normal recruitment channels. Employment agencies was infiltrated by OCG staff

# Underlying Causes

1. Ineffective labour market enforcement
2. Poor procurement practice does not incentivise good practice
3. Lack of clarity and monitoring of labour providers good labour standards practice
4. Lack of due diligence by food producers and growers on labour provision
5. Lack of requirement for due diligence on labour provision in the supply chain by supermarkets and others



# 1. Ineffective labour market enforcement

- DLME highlighted that a business could expect a NMW enforcement inspection around once every 500 years and once in 200 years in low-paid sectors
- LPC May 2020 report estimated 440,000 workers (1 in 5 on NMW) not receiving their NMW entitlement. 1,260 cases resulted in arrears being repaid to workers - less than 3 cases year per enforcement officer
- Recruitment businesses on average could expect a visit from the EAS every 20 years
- The GLAA has not inspected 60% of licence holders within the last 5 years and 36% in the last 10 years.



HM Government

## United Kingdom Labour Market Enforcement Strategy 2018/19

Director of Labour Market Enforcement

David Metcalf

May 2018



## GLAA Compliance Activity

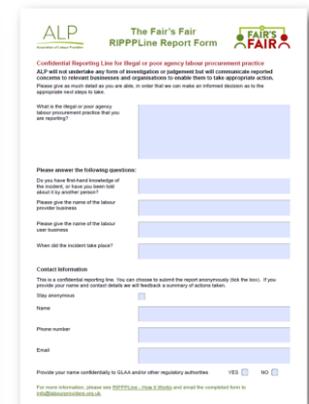
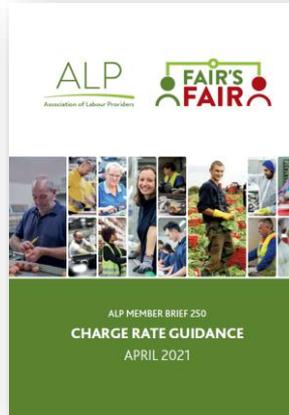
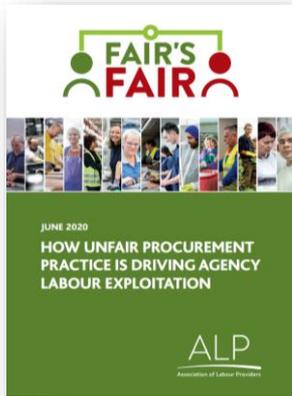
- ALP wrote to GLAA in Nov 2019 and March 2020 stating, “The ALP remains deeply concerned regarding the GLAA’s current compliance operations for the reasons detailed extensively in our correspondence and how this is consequently negatively impacting upon the credibility of the licensing scheme. We acknowledge your positive response and willingness to work with the ALP to review and revise the GLAA’s approach to compliance.”
- The GLAA conducted a ‘Compliance strategy consultation’ - ALP called on the GLAA to undertake a root and branch overhaul of its compliance operations and proposed 22 key actions for the GLAA to implement with urgency
- ALP has worked closely with the GLAA since its inception, and ALP’s biennial survey on shows overwhelming support for licensing and the work of the GLAA

# Operation Fort Review, June 2020

*“Despite the passing of the Modern Slavery Act, responsible suppliers are still being forced to compete on price with those that have much lower standards. It is important that the companies that are genuinely driving improvement receive the commercial encouragement and recognition that they deserve, from both retail clients and consumers.”*

# 2. Poor Procurement Practice

- 8 in 10 labour providers report competitors with charge rates so low that they do not believe that labour can be provided ethically and compliantly. Regular use of purchasing practices banned by the Grocery Code Adjudicator
- Fair's Fair – “An awareness and education programme to support the commercially sustainable procurement of agency labour so that workers never pay the price of poor purchasing practice”
- Guidance, training, tools, webinars and the RIPPPLine



# Operation Fort Review, June 2020

*“Good practice includes providing more in-depth training for staff in operational roles. The next step is using training to create anti-slavery champions in different departments, enabling them to view business strategy through a modern slavery lens.”*



stronger  
together

**RRT** RESPONSIBLE  
RECRUITMENT  
TOOLKIT.ORG

### 3. Supporting labour providers to adopt good labour standards practice

- **ALP** – Has reviewed, updated and upscaled all its Briefs, Guidance, Webinars, Website, Helpline, Membership Recruitment, ALP Academy, Expert Consultancy
- **Stronger Together** - Reviewed and updated - Tackling Modern Slavery in UK Businesses Toolkit , Employer/ Labour Provider Good Practice Implementation Checklist, Stronger Together Business Partner recognition, The Progress Reporting Tool  
  
New – The Modern Slavery Champion Pack; Labour Provider Verification Assessment and the UK Recruiters/Labour Providers Programme with ALP, APSCO REC and TEAM
- **Responsible Recruitment Toolkit** - Flagship online tool enables business to build capacity in, and self-assess, responsible recruitment practices; Subscribers can become an RRT Business Partner; interactive online training courses which bring responsible recruitment to life.



# Working in the UK - Your Rights

anceHR

ALP

stronger together

fast forward

RRT RESPONSIBLE RECRUITMENT TOOLKIT.ORG

clearview

alliance@alliancehr.co.uk

labourproviders.org.uk  
info@labourproviders.org.uk

stronger2gether.org  
info@stronger2gether.org

fastforwarduk.org  
enquiries@fastforwarduk.org

responsible  
recruitmenttoolkit.org  
info@responsible  
recruitmenttoolkit.org

clearview@clearview.co.uk  
clearview@nod.org

## Worker Engagement Tools

- Open source videos
  - Working in the UK – Your rights
  - Working in the UK Food Industry
- Free Just Good Work app



**WORKING WITH YOUR LABOUR PROVIDER**

**DUE DILIGENCE TO ENSURE GOOD PRACTICE**



**LABOUR PROVIDER 'CORE SCORE'**  
**COMPLIANCE OPERATIONS RATING EVALUATION**

This 'CORE Score' checklist supports labour providers to adopt a consistent approach in assessing their legal and ethical recruitment compliance. Use for self-assessment, gap analysis and action planning; to support collaborative working with clients and for signposting to key guidance and resources.

Company Name  Site  **CORE Score**

Completer Name  Email  Date

**Scoring System:** 0 = Not implemented/Don't know | 1 = Partially implemented | 2 = Fully implemented | N/A = Not applicable



No	Requirement	Checkpoint	Training/Resource	CORE Score	Action Required
<b>Commitment to legal and ethical compliance</b>					
1	Holds a current GLAA licence if supplying into regulated sector	Check licence held on <a href="#">GLAA Public Register</a>	<a href="#">ALP Academy</a> Module - Complying with GLAA Licensing Standards ALP Academy Module - Supplying agency workers into the food sector		
2	Demonstrates commercial and trading labour supply due diligence	Meets HMRC labour supply chain <a href="#">due diligence</a> and <a href="#">assurance</a>	HMRC guidance on labour supply chain <a href="#">due diligence</a> and assurance RRT Workshop - <a href="#">Labour Supply Chain Due Diligence and Partnerships</a>		

**4. Supporting food producers and growers to apply labour provider due diligence**

- Clear Due Diligence guidance and process
- CORE Score - Free and open to all; Accessible and straightforward; Comprehensive – covers all compliance requirements; Works in all UK sectors; Signposts to support, guidance and resources; Self-assessed or together with clients; Provides a single % Core Score; A starting point to lead on to implementing responsible recruitment management systems

**5. Next Steps -  
Driving the  
requirement for  
due diligence on  
labour provision in  
the supply chain**

*“It is generally accepted that temporary labour carries a higher risk of slavery.”*

**Operation Fort Review, June 2020**

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RECRUITMENT  
TOOLKIT.ORG

## Extra Free support now

- **Stronger Together** - Introductory and advanced training now extended to allow all supermarket and sponsor supply chain businesses and GLAA licensed labour providers to receive one free delegate place per organisation every 3 years.
- **Responsible Recruitment Toolkit** - Following Operation Fort, RRT has modified its sponsorship model so that all businesses in the global supply chains of its sponsors, and all ALP members, receive a free annual full subscription to the RRT online tool and free places on the RRT online training courses.

RRT sponsors' eligible suppliers and ALP members can book unlimited free places on RRT workshops:

The logo for Complyer features the word "Complyer" in a blue sans-serif font. The "er" is enclosed in an orange circle, and there are three small orange dots above the "y".

Complyer

The logo for Clearview features a stylized globe icon above the word "clearview" in a blue sans-serif font. Below it, the text "Global Labour Provider Certification Scheme" is written in a smaller, grey font.

clearview  
Global Labour Provider Certification Scheme

## Relaunching Soon

- **Complyer** - Intuitive and comprehensive audit software tool to assess and monitor labour provider compliance with UK legislation.
- **Clearview** - Global social compliance certification scheme to support recruiters and labour providers to demonstrate that they operate responsible, professional, legal and ethical management systems in their sourcing and supply of workers.



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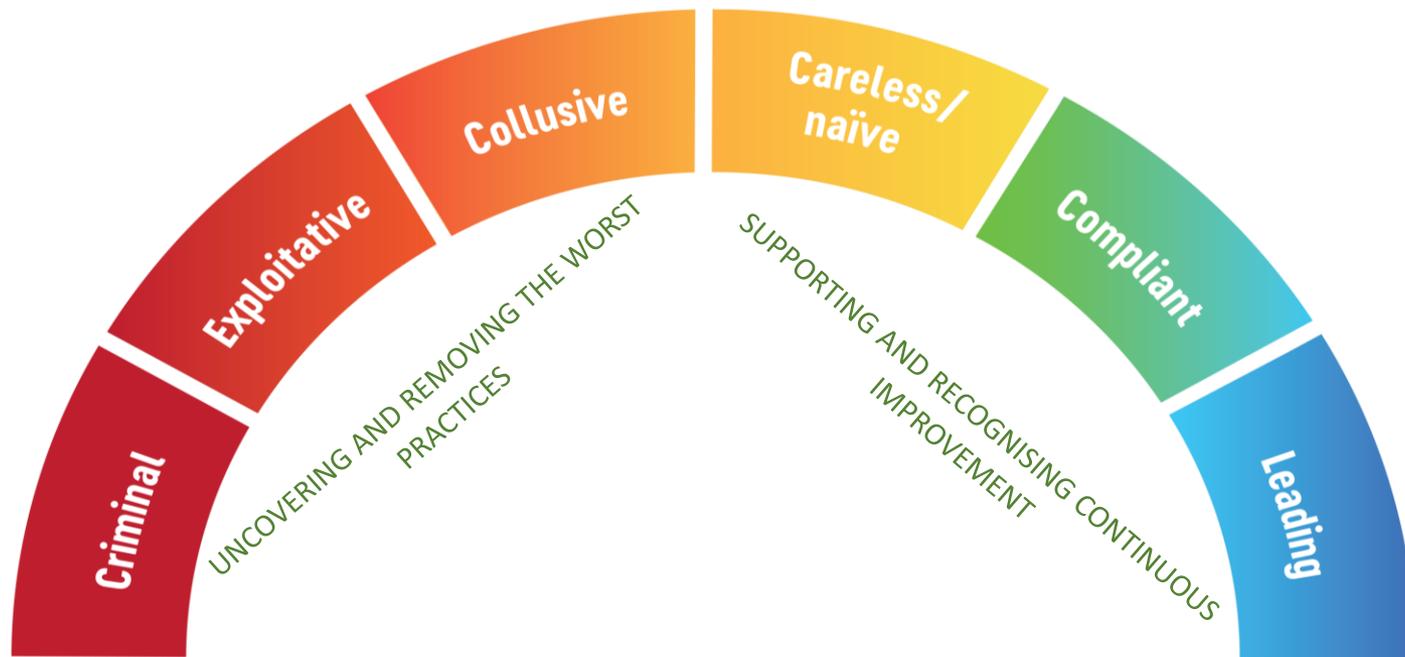
ALP

ACADEMY

## Partnership working with the GLAA and food industry

- The ALP, BRC and GLAA and other representative bodies are collaborating to develop a new **Food Supply Chain Protocol** in partnership with the wider food industry. This is in consultation stage and seeks to take an inclusive approach to collaborative working in the UK food supply chain with regards to protecting vulnerable workers.
- Collaboration to provide free training for all GLAA licence holders and applicants on the two-hour online workshop: **‘Labour Provider Compliance – Due Diligence to ensure Good Practice’**.
- Collaboration to promote free training for all GLAA licence holders and applicants on the Stronger Together **‘Tackling Modern Slavery’** workshop

# Shifting the dial...



# Monitoring labour provider engagement

UK Food Supply Chain	Number	%
Number of GLAA licence holders	1058	
Number of training GLAA licensed labour providers	819	
Number of GLAA licensed ALP Members	327	40%
ALP - Attended ALP compliance training in last 3 years	51	6%
ALP - Approved 3rd party compliance audit in last 3 years	7	1%
RRT - Number of subscribed GLAA licence holders	78	10%
RRT - Completed any RRT training in last 3 years	33	4%
RRT - Business Partner	6	1%
RRT - Clearview registered	24	3%
S2G - GLAA licence holders registered on website	443	54%
S2G - Attended S2G TMISB training in last 3 years	171	21%
S2G - Business Partner	38	5%

# Reporting labour provider engagement – The Labour Provider Compliance Maturity Framework

Engagement Level	Number	%	Definition
Level 0 – No engagement	380	46%	Not ALP member or registered with RR or S2G
Level 1 – Receiving information	445	54%	Any of: ALP member, S2G or RRT registered but not attended ALP compliance, S2G and RRT training in last 3 years
Level 2 – Building capability	4	0%	Level 1 plus has attended ALP, S2G and RRT training in last 3 years
Level 3 – Self-reporting			Level 2 plus sharing CORE, RRT and self-assessment with clients and is an S2G and RRT business partner
Level 4 – Externally verified			Level 3 plus satisfactorily Complyer audited and S2G Verified, or Clearview certified

# Engagement with supermarkets and their supply chains

The ALP will write again to the supermarket Chief Executives, asking their organisations to make three commitments:

1. 'Labour Supply Chain Payment Charter' – to sign the Charter and apply the fair payment commitments
2. 'Labour Provider Compliance – Due Diligence to ensure Good Practice training' – to require all labour users and labour providers in their UK supply chain, by July 2022, to attend the free training
3. 'Labour Provider Compliance Maturity Framework' – to require all the labour providers in their UK supply chain to achieve Level 3 by the end of 2022.



## LABOUR SUPPLY CHAIN PAYMENT CHARTER – DRAFT

Fair and transparent payment practices are essential for the protection of workers and the achievement of successful partnership working between labour providers and labour users. This Charter aims to create a more collaborative culture and ensure a strong, resilient, and sustainable labour supply chain in the UK.

By becoming a signatory to this Charter, an organisation agrees to apply the fair payment commitments in its dealings with its UK supply chain, to be monitored for the purposes of compliance by its supply chain against a set of agreed key performance indicators (KPIs), and to consider the performance of its supply chain against the agreed KPIs when awarding contracts.

### FAIR PAYMENT COMMITMENTS

#### LABOUR PROVIDER:

1. We calculate and detail charge rates in accordance with statutory provisions and industry guidelines to include all payments due to the worker and government.
2. We make full and correct payment as and when due to workers for all time worked. All pay and deductions are itemised on payslips that are received by workers prior to payment.
3. We make full and correct payment of all appropriate statutory benefits workers are entitled to, including Statutory Sick Pay, Maternity or Paternity pay and pensions.
4. We ensure that calculation of holiday entitlement will be transparent and accurate, calculated, and paid to workers in accordance with statutory provisions.
5. Payment due to a worker in respect of any work they have done is not withheld or unreasonably delayed on the grounds that payment has not been received from the labour user or for any matter within the control of the labour provider.
6. We do not charge directly or indirectly, any recruitment fees or related costs to workers and we apply contractual provisions requiring likewise to recruitment intermediaries and sub-agents that may be used in the recruitment supply chain - with appropriate due diligence to confirm adherence.
7. We earn no profits from our workers or applicants other than that charged to clients. Where services such as transport or accommodation are provided, fees are no more than the cost of provision, and we earn no incentives, kickbacks, or commissions from third parties who supply goods or services to our workers.
8. Workers are engaged by us directly in a recognised employment relationship.

#### LABOUR USER:

1. We pay a charge rate for supplied labour that takes into account the particular costs of supply plus a sustainable net margin in accordance with statutory provisions and industry guidelines.
2. We do not apply any type of payment or discount including 'First Free/Pay to Stay' payments, prompt payment or retrospective discounts as an incentive or requirement to be on a supplier list, as an 'investment into potential future business opportunities' or other similar types of arrangements.
3. We pay the labour provider within 30 calendar days from the end of the week in which the labour was supplied.
4. We make correct full payment as and when due for all labour supplied, in accordance with the contract. We do not deliberately delay or unreasonably withhold payment or change terms retrospectively to extend agreed payment dates.
5. Service and statutory cost variations are agreed promptly and fairly and payments for such variations are included in the payment immediately following the completion of the varied contract terms.
6. We adopt a transparent, honest, and collaborative approach when resolving differences and disputes with the labour provider. We ensure any withholding of payment due to supply disputes is proportionate and clearly, specifically and demonstrably justified in line with the arrangements set out in the contract and relates only to the labour time in dispute.
7. We pay all indirect working time costs including time spent on training, induction, travel between sites and changing time.
8. Where workers are ordered, arrive and are subsequently not used, or not used for the full shift, we pay at least a minimum attendance payment.

ALP  
Association of Labour Providers

CIPS  
Chartered Institute of  
Procurement & Supply



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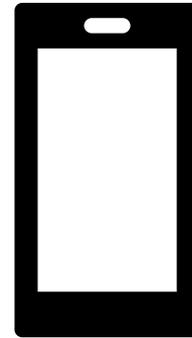
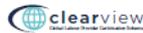
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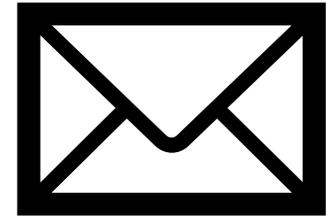
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ALP RESPONSE TO THE INDEPENDENT ANTI-SLAVERY  
COMMISSIONER'S CALL TO ACTION

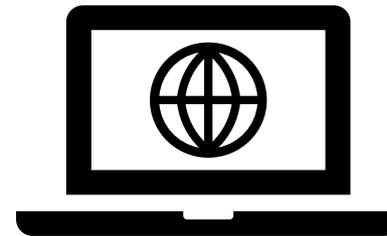
JUNE 2021



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Gangmasters &  
Labour Abuse Authority

**A.O.B**

**Date of next meeting  
14 September 2021**

Working in partnership to protect vulnerable and exploited workers

# Q&A log

- If you're using a PC or laptop, and you'd like to save the questions and answers that have been shared in the question box today – select File and then 'Save questions' at the top of your control panel.
- You can also save the question log from a Mac – on the 'GoToMeeting' toolbar select 'File' and 'Save questions'
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# Thank you for joining us today

