



Gangmasters &
Labour Abuse Authority

Construction protocol survey results

July 2021

Construction protocol survey results

To understand if signatories of the GLAA Construction Protocol have benefited from participating in the protocol, and how we can improve and strengthen the support the GLAA provides we asked all signatories to complete a short online survey.

72 of 249 signatories (29%) engaged with the survey, below is a summary of their responses (see [Appendix 1](#) for more detail).

Impact of the Protocol

The three most useful activities signatories identified (see [Table 1](#)) were:

1. The GLAA partnership bulletin newsletter.
2. GLAA resources to raise awareness of labour exploitation and modern slavery.
3. Construction protocol induction pack.

The three most common activities businesses stated they have introduced to tackle labour exploitation since becoming a Signatory to the Protocol (see [Table 2](#)) were:

1. Training and awareness campaigns in their organisation.
2. Amended or updated their modern slavery statement process or content.
- 3a. Allocating responsibility for modern slavery to a board member.
- 3b. Inclusion of modern slavery elements in supplier terms and conditions.

Barriers to engagement

Respondents identified many barriers to engagement including time and resource constraints, the impact of Covid and a drop off in communication from the GLAA. A few respondents also commented that they had only recently joined the protocol.

“2020 felt like a very quiet year from the Construction Protocol, would like to see more activities and the Protocol pushing signatories to achieve more.” Stakeholder’s feedback

See [Table 3](#) for all feedback on barriers to engagement.

Future Opportunities and Areas for Improvement

The most common responses to the question ‘What are the three most important things you would like the construction protocol and its partners to achieve in the next 1-3 years to support your business?’ were:

1. Lead industry awareness campaigns.
2. Develop tools to risk assess their supply chain.
3. Develop industry-wide set of labour agency standards.

See [Table 4](#) for all results.

Next Steps

Signatories offered several opinions on how the Protocol could become more sector owned and managed, including:

- Improving ownership through the creation of 'working' or 'collaborative' groups.
- Greater input from stakeholders, particularly companies dealing with issues on the ground.
- Engaging with labour providers that work in the construction sector.
- Strengthening membership requirements i.e. companies must demonstrate progress to join.

See [Table 5](#) for all responses from signatories.

Additional comments

Whilst most comments on the Construction Protocol were positive, some respondents highlighted a drop off in GLAA interaction and suggested the initial purpose of the Protocol had been lost by a larger membership.

See [Table 6](#) for all additional comments.

Appendix 1

Table 1

Which of the following have you found useful since joining the protocol?	Responses
GLAA partnership bulletin newsletter	39
GLAA resources to help raise awareness of labour exploitation and modern slavery	35
Construction protocol induction pack	31
GLAA construction webinar	23
Intelligence e.g. GLAA Industry profiles	19
Presentations/case studies by protocol signatories	13
Information and advice provided by GLAA colleagues	10
Other	6

Table 2

Since joining the protocol, which of the following activities have you introduced as part of your programme to tackle modern slavery and labour exploitation?	Responses
Training and awareness campaigns in your organisation	45
Amended or updated your modern slavery statement process or content	31
Allocating responsibility for modern slavery to a Board member	30
Inclusion of modern slavery elements in supplier terms and conditions	30
Whistleblowing for your organisation	27
GLAA 'Modern Slavery in Construction' material used for site inductions	23
Desk top risk assessment of suppliers	21
Ongoing supplier management and monitoring	19
Issuing self-assessment questionnaires to suppliers	18
Checking for ethical compliance and/or due diligence processes in supplier selection	18
Training and awareness campaigns for your suppliers	15
Materials/resources from other training providers	14
Whistleblowing for your suppliers	13
Supplier audits – using internal audit teams	10
Other	10
Introduced a response protocol	9
Introduced worker welfare surveys	8

Grievance mechanism with reference to Modern Slavery	6
Suppliers audits – using 3rd party audit companies	5
Labour provider audits	5
Consultation and engagement with employee forums and/or trade unions	5
Developed a remedy policy	2

Table 3

If you haven't undertaken any of the above activities as a result of joining the protocol, why not?
<ul style="list-style-type: none"> • We have only just joined but we are looking forward to participating in as many activities as possible. • Time constraints and the last year with Covid we have not had the resource - we are hoping 2021 Q4 and beyond will improve. • We have taken some steps but are just putting all these things in place. • New to the business so I need an understanding of what is available etc and then I will gladly use the materials. • I have saved & used information from the Construction Protocol Induction pack. • I have not specifically picked up on any webinar or comms coming through to our business since joining a couple of months ago. It is early days for us. • I personally haven't been to a webinar but a colleague of mine in the business has been. • I have found out that our email system has been blocking GLAA messages also I was on furlough for most of last year. • We only joined within the last 2 months and are focusing on integrating your information within our policies. • Awareness raising. • Only joined last month. • Only two people in the company to do these things. • The person who was the lead contact had left the business and we were unaware of the activities being undertaken. • Recently joined, have not received any invitations to date. • Time / other pressures / challenges of working in the Covid environment. • We have only just joined and are currently working on implementing the resources most effectively in our business. • It hasn't filtered to me. • Short period of registration and lack of awareness of events taking place. We haven't received much in the way of communications. This survey being only the 3rd email since registration. • We have carried out remote worker contact. • We have been a member for a while and there has been a significant drop in communication and engagement from the for at least the past year now. We weren't aware some of those things existed. • I have read emails from GLAA so have been active as such. • Time and resource are the main challenges we have. Complexity of supply chain currently holds us back from having a wider auditing approach. • Not applicable. Have utilised all of the information provided.

Chart 1

How long have you been a signatory to the construction protocol?

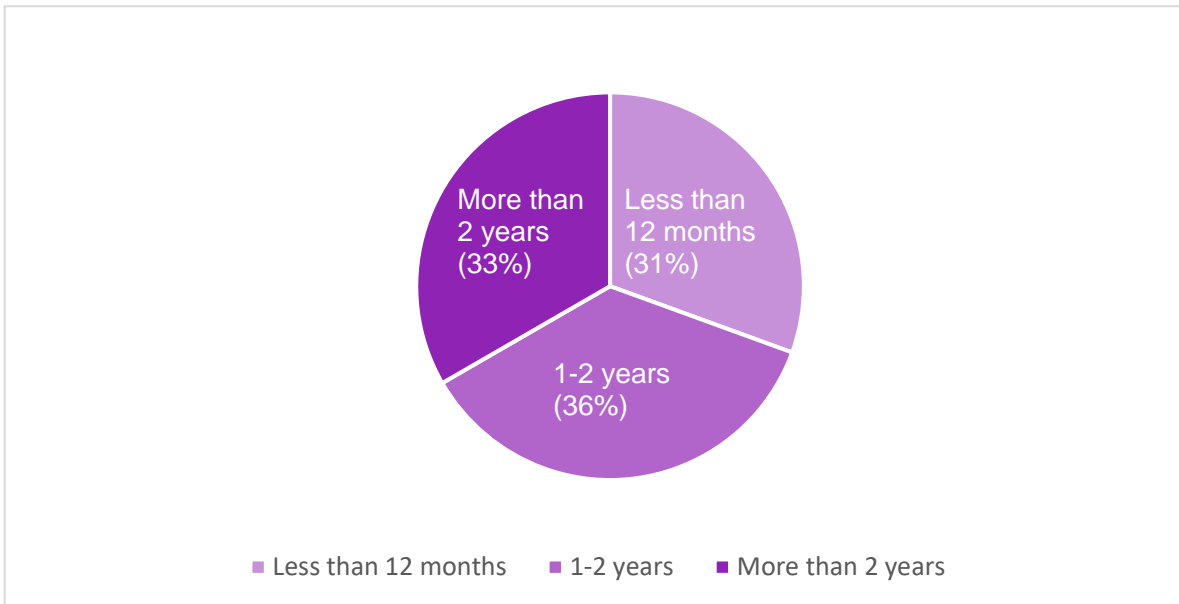


Chart 2

Do you believe the GLAA is effective in promoting employment rights to workers at risk of labour exploitation?

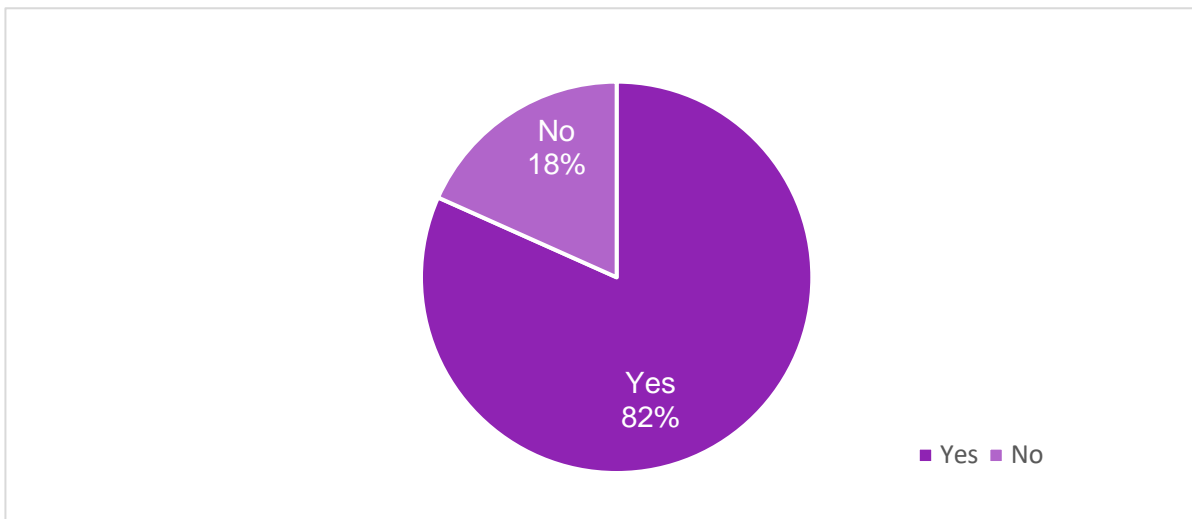


Chart 3

Do you believe the GLAA is effective in influencing businesses to make changes to their due diligence to identify and prevent labour exploitation on their supply chains?

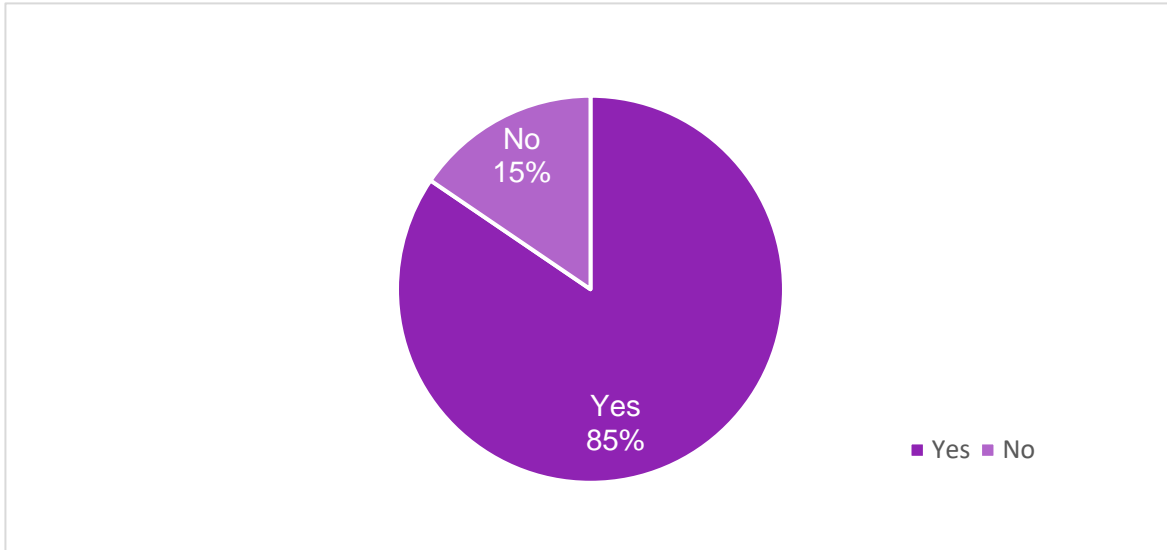


Chart 4

Have you found any of the following types of labour exploitation issues in your business or supply chains in the last 12 months?

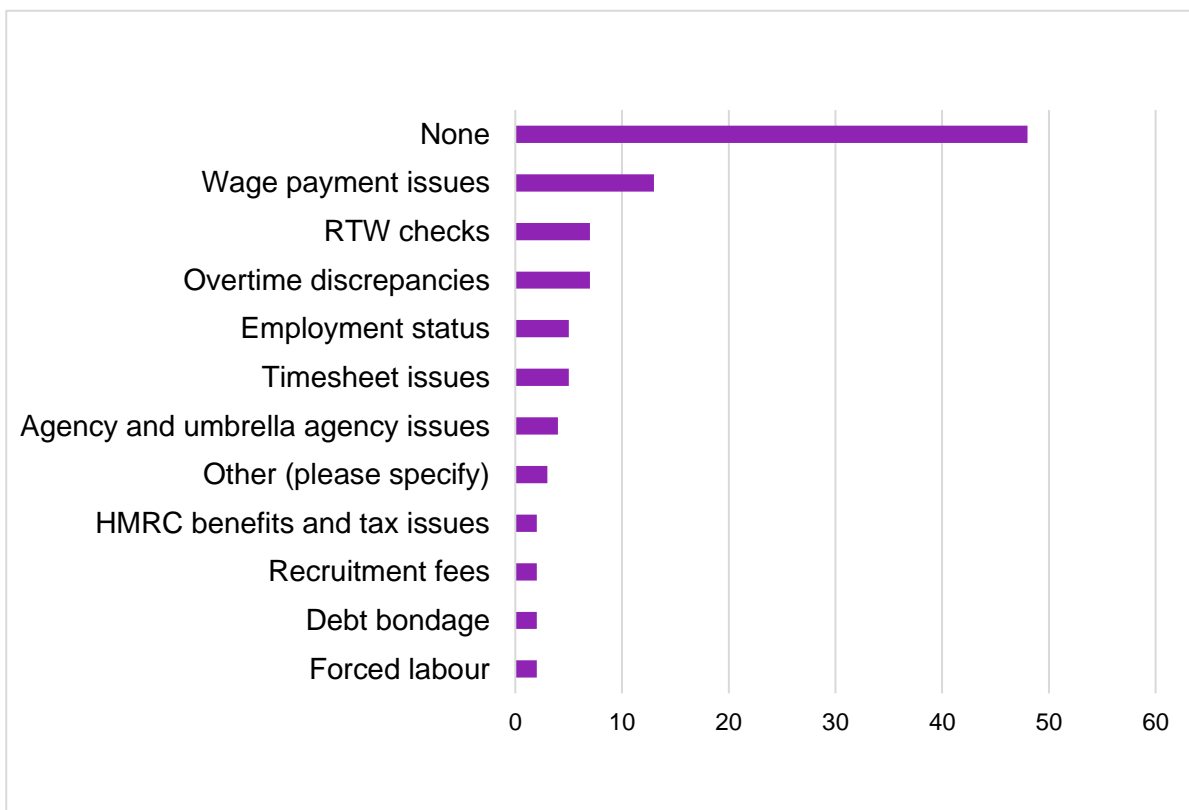


Table 4

What are the three most important things you would like the construction protocol and its partners to achieve in the next 1-3 years to support your business?	Responses
Lead industry awareness campaigns	39
Developing tools to risk assess your supply chain	30
Develop industry-wide set of labour agency standards	23
Developing training materials	21
Stronger regulation of labour agencies and around the use of umbrella companies	20
More information and intelligence sharing	20
Worker engagement on the ground	15
Developing risk mitigation specifically for labour providers/recruiters	14
Developing auditing tools	12
Communications and webinars	12
More support for SMEs in the construction sector	12
High-level engagement with governments, NGO community, trade unions and other stakeholders	11
Building a strong voice to highlight the sector's achievements and challenges	10
Events and meetings to share best practices	10
Strengthening membership (Regional awareness-generation and outreach activities)	3

Chart 5

Do you use any of the GLAA resources in your business?

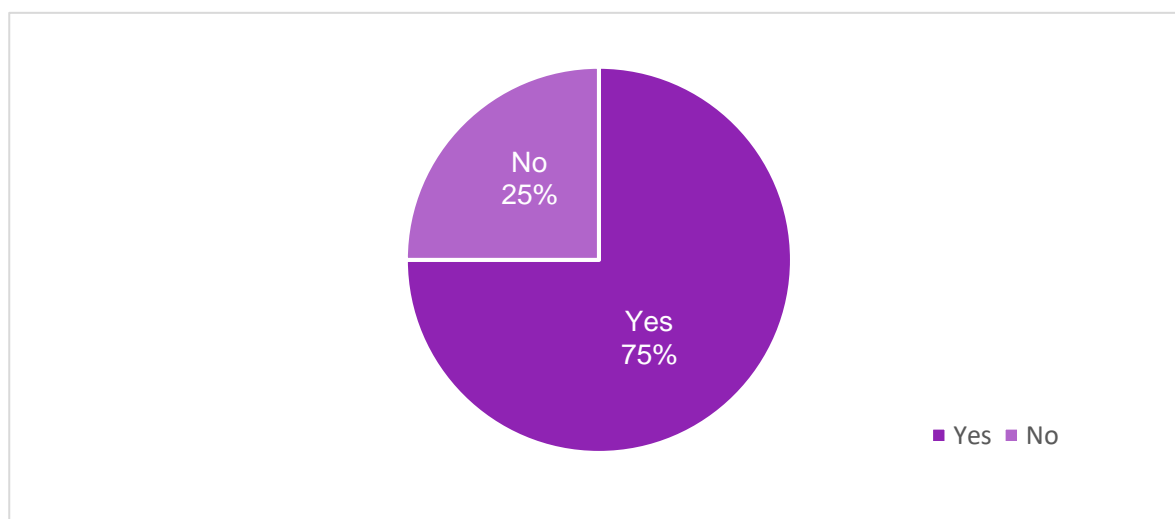


Chart 6

Would you be willing to contribute to the development of materials, resources and good practice ideas to be shared with fellow signatories?

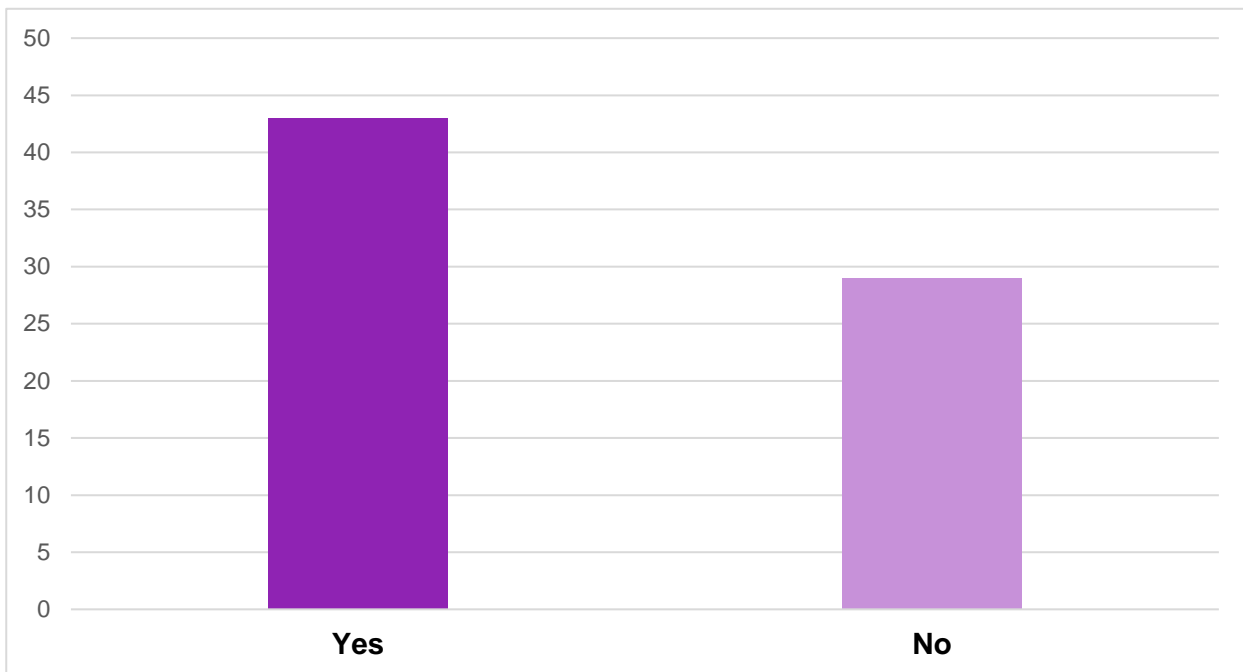


Table 5

How should the construction protocol develop its approach towards becoming more sector owned and managed?

- Work with industry bodies such as BuildUK and CLC.
- I think it is by gaining as much participation as possible to ensure there is complete visibility. Taking this subject to the top of the agenda. On boarding main contractors to encourage or mandate participation through their procurement processes.
- Encourage participants to become independent chairs and run the group.
- Needs to be collaborative working with labour users and providers.
- Not sure as not had much interaction with it yet.
- A greater understanding of the risks and issues surrounding not just organisations but people for companies involved.
- Keep communicating and linking up with the smaller contractors. Encourage the tier one contractors to have all their sub-contractors signed up.
- The industry needs a single voice / approach. Consider joining forces with the Association of Labour Providers and the imminent launch 'Responsible Construction Recruitment'.
- Assign additional resources.
- Continue to raise profile of MDS issues with SMEs.
- Perhaps greater engagement with institutes such as but not limited to the CIOB, IEMA.
- Early days for us but a regular webinar, steering group and newsletter update as mentioned will be helpful. However, more importantly, as a member now, we know we can lift the phone to share or advise at any time.

- Greater involvement by stakeholders. An understanding by clients and government in business that are operating in line with the protocol will make members engage more.
- Awareness campaigning & sector / SME education.
- Continue to be a force for strong policy and policing.
- Engaging with recruiters and drive out the use of umbrella companies to obtain labour at below the comparator rates of direct labour.
- Leadership in the larger construction companies.
- Become a mandated element of the procurement process.
- Public sector is quite straightforward as all contractors should be mandated to abide to the protocol with periodic audit by the respective body. Private sector is going to be more difficult and will probably require legislative support to deal with SME and lower compliance.
- More collaboration.
- Sector clients to recognise and mandate membership. Similar to what CIRAS do with RISQS membership.
- Less paper, less data, more personal awareness and responsibility. This is not an exercise in collecting paper it is a moral exercise that people should do.
- Appoint a Board.
- Form a representative steering committee, to focus on the outcomes identified by this survey.
- Link with industry bodies such as the recruitment and employment confederation.
- Higher presence on site, with random auditing of sub-contractors and suppliers to ensure they are more knowledgeable and compliant.
- Free workshops for smaller organisations with limited resources to highlight the key elements that they should focus on & run through the available resources. Sometimes there is just too much and can be a little overwhelming.
- Introducing working groups and encouraging collaborative companies to actively engage with companies to share best practices, protocols etc.
- Greater input from companies in the sector who are actually tackling problems on the ground. More personalised resources and training for different areas of the industry.
- Talking to construction businesses highlighting the realities.
- Charge a nominal registration fee and having a committee of industry representatives to head up the protocol.
- Get suppliers to hold events and invite the subcontractors.
- Reinvigorate a collaborative group.
- Champion certain basic checks of companies that work on Public & Private sector contracts which will prove they prioritise direct employment including: - Number of direct employees (can be checked with published Statutory Accounts) Monthly Tax & NI returns Stakeholder Pension payments.
- As mental health resources have developed in construction help should be introduced for persons in forced labour. Information can be released easily as part of onsite inductions, so persons know where to get help or advice.
- The Protocol has all but fallen apart due to staff changes and lack of ambition. It's missed what was a great window of opportunity and has now lost credibility in the construction sector.
- The purpose of the protocol initially was for the GLAA to provide guidance and support. This has lacked recently but needs to be in place. When we have contacted the GLAA for assistance with a concern the response was disappointing and was not helpful. In the future I would look to contact a charity in this sector.
- I have not looked into the protocol so cannot comment as of yet.

- Continued raising of awareness.
- Some options: Working Group led by a select few players say 7-10 who co-ordinate with GLAA and support activities for wider sector; The protocol needs more teeth e.g. all members have to submit modern slavery statement. All have to demonstrate some progress e.g. Gold, Silver, Bronze status for working to combat modern slavery. Status achieved by undertaking different activities raises the bar amongst the industry. Being a Protocol member is no longer enough. For support, work with others e.g. Supply Chain Sustainability School for learning materials and training. Prequalification companies e.g. Constructionline, Achilles, RSSB etc for supplier prequalification on modern slavery.
- Regular consultation with partners.

Table 6

Any additional comments
<ul style="list-style-type: none"> • To tackle this issue head on its important the industry has a single voice. GLAA could bring all trade bodies together and agree a standard approach for industry. We would be happy to discuss / support. • I think the work the GLAA is commendable, but I realise there is more work we as an organisation should do to better promote the issues associated to Modern Day Slavery. • Good to see the GLAA turn their attention to the exploitation of workers by poor quality recruitment companies underpaying workers by using umbrella companies where the end user companies get cheap labour which ultimately means that legitimate agencies can't compete on price and lose business as a result and workers are underpaid. • It would be good if we could have a similar protocol in the waste industry as I understand this is at a high risk of exploitation. • We are time poor this year following from the challenges of the pandemic, but we would be interested in providing support in the new year ahead. • Keep up the good work! • The GLAA is a fantastic system and if promoted properly and with the support of not only tier 1, but all tiers of the construction industry and its supply chain then it will be able over time to eradicate modern slavery in construction. The support needs to be there in all aspects though, including direct employment and close contact with HMRC to ensure taxes are up to date and all are being paid correctly. • Keep up the good work. • We don't have the resources for development of materials etc but are happy to forward material and processes to ensure FIR in the construction industry. • Smaller organisations sometimes struggle to know where to start and understand the issue within their own supply chains. Just something as simple as a desk top risk assessment of suppliers may appear simple to you but it is not, its massively time consuming and most likely there is no one with the skills to do it with any degree of accuracy. As smaller organisations make up such a large proportion of any supply chain then creating tools that they can use with minimum effort there are so many draws on their time. • I am deeply disappointed by the lack of contact or engagement by the GLAA. You have messed up what was an exciting and dynamic platform. • When the protocol was first introduced there were tangible results that came from it, e.g. the site pack. However there has been no meeting for over a year now and proper interaction. The protocol has become too big and companies just seem to be

able to become signatory without much due diligence or being held to account for any action. This has de-valued the protocol and what it started out to be. There are too many consultants involved who are trying to sell their consultancy work to companies. The protocol should be a space for construction companies to share ideas and concerns in a safe place (this is what it started out as). The protocol should be led by the GLAA as they are the experts in intelligence. Companies should only allow to be signatory's if they properly engage and are held to account and meet a baseline standard.

- 2020 felt like a very quiet year from the Construction Protocol, would like to see more activities and the Protocol pushing signatories to achieve more. Not letting people say they are signatories so that's enough.