



# Gangmasters & Labour Abuse Authority

## Minutes

<b>Title of meeting</b>	<b>77<sup>th</sup> GLAA Board meeting</b>		
<b>Date</b>	10/05/2022	<b>Time</b>	10:15 – 15:30
<b>Venue</b>	Apex Court, Nottingham		
<b>Chair</b>	Julia Mulligan	<b>Secretary</b>	Michael Sewell
<b>Attendees</b>	Julia Mulligan (JM) GLAA Board Chair Deep Sagar (DAS) GLAA Board Member Dr David Snowball (DJS) GLAA Board Member Pippa Greenslade (PG) GLAA Board Member Suzanne McCarthy (SM) GLAA Board Member		
<b>In attendance</b>	Elysia McCaffrey (EM) CEO Daniel Scully (DS) Director of Resources Darryl Dixon (DD) Head of the Single Enforcement Body (SEB) Programme Emma Coxon (EC) Head of People and Change Frank Hanson (FH) Head of Prevention Ian Waterfield (IW) Head of Enforcement Justin Rumball (JJR) Head of Finance Michael Sewell (MS) Secretariat Officer Paul Coffey (PC) Head of Communications Nicola Ray (NR) Head of Regulation Samantha Ireland (SI) Head of Governance Viral Mehta (VM) GIAA		
<b>Home Office attendees</b>	Anita Bailey (AB) Home Office Sponsorship Unit (HOSU) Simon Hookins (SH) Modern Slavery Policy Lead, Home Office Mary Halle (MH) Home Office		
<b>Apologies</b>	Jane Walker (JW) Risk and Information Assurance Manager		

1.	<b>Introductions</b> <ul style="list-style-type: none"><li>JM welcomed all attendees to the meeting.</li></ul>	
2.	<b>Apologies</b> <ul style="list-style-type: none"><li>Noted as above.</li></ul>	
3.	<b>Minutes of the previous meeting</b> <ul style="list-style-type: none"><li>The minutes of the previous meeting were agreed as an accurate record.</li><li>Board members agreed that the minutes should be written in plain English with more focus on Board member comments.</li></ul>	
4.	<b>Declarations of interest</b> <ul style="list-style-type: none"><li>None.</li></ul>	

5.	<p><b>Action Points</b></p> <p>Action points closed:  <b>BM73(9), BM73(18), BM74(11), BM74(13), BM75(13), BM75(14), BM75(18), BM76(1), BM76(3), BM76(4), BM76(5), BM76(7), BM76(8), BM76(10), BM76(12), BM76(13), BM76(14), BM76(15), BM76(16), BM76(17), BM76(18), BM76(19)</b></p> <p>Ongoing actions:</p> <ul style="list-style-type: none"> <li>• <b>BM73(8)</b>: JJR will ask finance heads at other enforcement bodies how Board reporting can be presented clearly, regardless of Board member background. <b>(JJR)</b></li> <li>• <b>BM74(4)</b> Live sessions about what risk is are due to take place. JM requested that a new timescale be included in the next Risk Update, then the action can be closed. <b>(JW)</b></li> <li>• <b>BM76(2)</b>: Discuss options for providing expertise to GLAA from Home Office (HO) at the next HO Sponsorship Unit (HOSU) meeting. HO to provide further update. <b>(HS/AB)</b></li> <li>• <b>BM76(6)</b> BEIS to provide a SEB update at a future Board meeting. <b>(BEIS/DD)</b></li> <li>• <b>BM76(9)</b> IW will pick up Victim Navigator / NRM conversation with DJS. <b>(IW)</b></li> <li>• <b>BM76(11)</b> Board members to test risk appetite levels. This work has not begun yet. <b>(DJS/JW)</b></li> </ul> <p><b>Action</b>  <b>BM77(1)</b> Liaise with new NEDs about visiting operational activity. <b>(IW)</b></p>
6.	<p><b>CEO Update, Elysia McCaffrey</b></p> <ul style="list-style-type: none"> <li>• The Business Plan (BP) has been launched internally. EM thanked SM, DJS, JM and Governance Officer Megan Bethell (MB) for their input. It was well received by colleagues, largely because they were consulted throughout the process. The conflict of ambition and resource appears to be widely understood.</li> <li>• GLAA Head of Intelligence Ian Walker has retired. This is an opportunity to assess whether the current structure is correct. The Intelligence improvement project will continue, now headed by SI with support from DS.</li> <li>• The People Seminar will take place on 24/05/2022.</li> </ul>

7.	<b>Home Office Update</b> <ul style="list-style-type: none"><li>• MH introduced AB. AB has worked for the Home Office (HO) in frontline operations and has experience of working with the GLAA.</li><li>• Helen Stockley, the Head of Safeguarding Sponsorship, has left the HO. She has been replaced by Hannah McCarthy.</li><li>• The Good Code of Sponsorship is due to be published on 16/05/2022. This includes assessments of the maturity level of sponsor relationships. MH will provide formal confirmation to the GLAA in the coming weeks.</li><li>• Board member recruitment is ongoing and on-track.</li><li>• A delegation letter is due and will cover the programme of reviews for Arm's length bodies (ALB) as proposed by the Cabinet Office. The HO will respond to a letter from the Minister of State for Brexit Opportunities and Government Efficiency that asks which ALBs will be disbanded. The committee has asked for the 5% savings proposed by the Chancellor of the Exchequer to come from these reviews. HO are working with the Treasury to see if savings can be made in the process. The SEB has been factored into timescales.</li><li>• The review process at another ALB where JM is a NED has significantly impacted resource. This could be similar for the GLAA.</li><li>• Board members questioned the regularity of reviews and how it might sit alongside the Single Enforcement Body (SEB). Although there has not been a review recently, a clause in the Modern Slavery act requires the GLAA to be reviewed.</li><li>• The business plan is being reviewed by Ministers. Minister Maclean has shown an interest in this area.</li></ul>
----	--

<p>8.</p>	<p><b>Finance:</b></p> <ul style="list-style-type: none"> <li>• The budget deficit of £550,000 has been cut to £250,000. Roughly £1 million of charges had been accrued – this has dropped to £700,000. The HO have provided support around IT systems. Cash control totals need to be worked through. DS thanked JJR for his work in this area.</li> <li>• DAS provided the following suggestions: <ul style="list-style-type: none"> <li>○ JJR could present a standard profit and loss statement with lines such as cost of premises, staff, operations, comparing the budget last year to this year. The budget for this year could be presented using those lines as well.</li> <li>○ There should be authorisation levels agreed if there is non-budget spending. The capital budget should go through a similar process as the revenue budget (propose to Board, gain its approval, then propose to HO).</li> </ul> </li> <li>• DS has started work on the target operating model. With uncertainty around SEB there is not much appetite for change, however there are ambitions to place intelligence at the heart of the GLAA. The content will be influenced by lessons learnt, particularly around the compliance strategy and recruitment.</li> <li>• JM does not want to lose an opportunity to improve processes just because there is less financial pressure.</li> <li>• The capital budget allocation has been delegated to the CEO.</li> <li>• The Board discussed the need for realistic workforce planning and the risks associated with using the ‘vacancy factor’ as a key tool in financial management which they did not consider to be effective. MH confirmed that this will be a recommendation from the HO in the coming year.</li> <li>• GLAA is on schedule for a HMICFRS inspection. Board members agreed that it is difficult for the GLAA to absorb the costs involved.</li> </ul> <p><b>Action</b></p> <p><b>BM77(2)</b> Produce a recommendations paper on future financial reporting after consulting with other ALBs. <b>(JJR)</b></p> <p><b>BM77(3)</b> Clarify a system of delegation for organisational spending and how/if this is managed through the Board. <b>(JJR)</b></p> <p><b>BM77(4)</b> Remit workforce planning to REMCO. <b>(EC)</b></p> <p><b>BM77(5)</b> Pick up with Mark B from HMICFRS around their fee. <b>(DS)</b></p>
<p>9.</p>	<p><b>Approval of Business Plan &amp; Performance Framework, <i>Sam Ireland</i></b></p> <ul style="list-style-type: none"> <li>• SM highlighted the good work of Governance Officer MB and Leadership Team (LT) on the Business Plan (BP). The BP has not been published but is being used internally to drive objectives.</li> <li>• Board members provided the following feedback on the style of the BP: <ul style="list-style-type: none"> <li>○ It should have a strong visual element.</li> <li>○ DAS would like the meaning/context of percentages to be specific.</li> <li>○ PG liked the language used and asked LT to think about how the BP can be used for marketing and engagement.</li> </ul> </li> <li>• MB would like to be involved in next year’s strategy. Conversations on this will begin with the Board in July 2022.</li> <li>• EM thanked MB for her work around this.</li> <li>• In discussions with MB, JM and DJS queried the measurables. They also discussed being firmer as a regulator and not just using ‘compliance’ terminology.</li> </ul>

10.	<p><b>6-monthly risk management update, <i>Jane Walker</i></b></p> <ul style="list-style-type: none"> <li>• Two new risks have been identified: ‘inadequate data as an evidence base’ and ‘update of policies and SOPs’.</li> <li>• JW provided an overview of the change in risk scores as detailed in her paper.</li> <li>• ‘Single Enforcement Body’ and ‘Stakeholders’ were considered as strategic risks at the previous Audit and Risk Committee (ARC) meeting, but it was decided that they are better managed on the local risk registers.</li> <li>• Ten local risk registers are all scrutinised and monitored at Extended Leadership Team (ELT) meetings and Programme Board. The group discussed the visibility of risks that are managed at the local level. Operational risks at this level potentially need to be raised – this will be discussed further at the next ARC meeting.</li> <li>• Further changes will be made to the risk management policy.</li> <li>• SM provided SI contacts at the College of Policing to help separate operational and strategic risks.</li> <li>• One data protection (DP) breach occurred in the last quarter. It did not require reporting to the Information Commissioner’s Office (ICO).</li> <li>• JW is looking at how to build resilience around subject access and whether there is support available from the HO.</li> <li>• DAS wants the strategic risk register (SRR) to have risks around protection of victims, number of licensing applications and quality of licensing care. It was agreed at ARC that work will take place to increase the visibility of these risks.</li> <li>• The organisation’s culture must be open and transparent for risks to surface. FH suggested visiting different teams may help with this.</li> <li>• DJS raised that it may be worth finding ways of communicating the SRR to the wider organisation. Colleagues may be aware of strategic risks, but it might not be explicit.</li> <li>• The Intellishare risk remains black because it has not been tested. Conversations between IT managers and Intelligence have taken place. Assurance around iBase is required as Intellishare was initially chosen because of the organisation’s limited capacity to run intelligence systems.</li> </ul>	
11.	<p><b>GIAA closed session</b> A closed session was held between Board members, EM &amp; VM.</p>	
12.	<p><b>LUNCH</b></p>	
13.	<p><b>SEB Update, <i>Darryl Dixon</i></b></p> <ul style="list-style-type: none"> <li>• The Employment Bill was not included in the Queen’s Speech. A Modern Slavery Bill was announced under the list of regulation and business. This will include changes to the slavery trafficking risk order. DD is optimistic that the SEB will be attached to another bill.</li> <li>• SH stressed that the SEB project has not been abandoned. It is still uncertain what the timescales are and whether the SEB might produce the efficiencies sought after by government. JM asked for the delivery of the BP to remain as the primary focus.</li> <li>• SEB drop-in sessions are held weekly in response to Staff Survey results which highlighted uncertainty around the SEB as a concern for staff.</li> </ul>	

14. **Q4 performance pack/business plan progress, Sam Ireland**

- SI provided an overview of her paper. 11 out of 24 targets have not been met this year.
- The group discussed performance issues in regulation. SM thinks that the difference between the days targeted and achieved is unsatisfactory. She asked for regular substantive papers on regulation until this issue has been satisfied.
- DAS asked for more context on the numbers provided.
- NR explained that the following factors have affected regulation:
  - Inspections have been affected by the wellbeing of some staff which has been a key issue.
  - Although Enforcement have temporarily provided resources, a significant training commitment is required.
  - Overseas providers are applying for a licence for the Seasonal Workers Pilot and current checks do not comprehensively cover these kinds of businesses.
  - New staff are in post but are still training.
  - The Intel team are being overwhelmed by their workflow.
  - Continuous improvement activity is taking place with practitioners from HM passport office.
  - Data quality in reporting must be improved. This is difficult as it is manually driven.
  - The operational hours of the helpdesk were reduced, freeing up significant time for the licensing team.
- Board members expressed concern that issues in regulation may persist into the following year.
- Board members made the following comments:
  - SM challenged NR to implement creative measures despite the resource issues.
  - PG suggested increasing the time limit for overseas applications.
  - DJS commented that if the GLAA judges itself against numbers of victims, it could chase areas with high numbers of victims.
  - DJS suggested that the GLAA run an exercise to judge if the licensing scheme reduces risk. PG's experience tells her that the licensing scheme has value, but she agreed that the challenge is quantifying it.
  - JM questioned the length of time to reach a licensing decision.
- As the resource issue will not be resolved soon, Board members agreed that the issue needs to be addressed by other means.
- Board members requested that key performance risks be explored in detail as separate papers at future Board meetings.

**Decision**

1. A regulation performance gold group will be established and report back at the next Board meeting.

**Action**

**BM77(6)** Meet with EM, DS & SM to discuss specific issues around regulation and bring back a substantive paper on regulation performance issues to the next Board meeting **(NR)**

**BM77(7)** Circulate previous paper on victims to Board members. **(IW)**

15.

**People Survey results, *Elysia McCaffrey***

- EM thanked HR Officer Jada Samuel for providing a comprehensive summary of the People Survey results.
- 71% of staff engaged in the survey which is a positive result and higher than the previous year. Wellbeing, diversity and engagement are positive.
- Staff responded negatively towards the Leadership Team. High numbers stated in the survey that they cannot commit to staying with the organisation long-term due to SEB uncertainty.
- The results were shared in an all staff call within two weeks of the survey closing, with the opportunity to invite EM to team meetings to provide more detail.
- Board members made the following comments:
  - DJS suggested that a risk-based approach should be taken to the results.
  - PG noted that communications around the SEB are not working to dispel the sense of uncertainty. Negative perceptions of LT have not changed much from the previous year.
  - SM would like there to be questions that relate to the Board.
  - DAS suggested looking for qualitative comments. It could also be worth exploring if positive actions that lead to improvements are worth trying to replicate in other areas.
  - JM noted that learning and development (L&D) scored lower than other areas of the business.

16.	<p><b>Review of licence fees 2022, Nicola Ray</b></p> <ul style="list-style-type: none"> <li>• An increase to the licence fee must benefit the organisation as it will require significant work. A model must be identified that adheres to Treasury rules on fees whilst being uncomplicated for the GLAA to operate. There is a risk of a pushback from businesses.</li> <li>• Board members made the following comments: <ul style="list-style-type: none"> <li>○ Fundamental preliminary issues must be considered before work can begin, for instance time and resources.</li> <li>○ There could be a conversation with the Treasury to see if a cost neutral licensing scheme could be operated.</li> <li>○ An increase must be set in the context of being a fundamental piece of work, not just a reaction to the flat cash settlement.</li> </ul> </li> <li>• The Disclosure and Barring Service (DBS) had a similar fee change process. MH suggested that the GLAA could join up with the DBS to look at how this was modelled. HO will work closely with the Treasury before proposals go to ministers for approval.</li> <li>• Board members requested HO reassurance that a fee increase is possible. MH expressed that it is worth pursuing as it is an opportunity to explore efficiencies and would have value for future spending round submissions.</li> <li>• EM feels that timescales and efficiencies should be looked at otherwise the recovery fee may be wrong.</li> <li>• JM asked for a business case to be put together before the end of the calendar year.</li> <li>• Board members queried whether the Review of Licence fees 2022 paper could be used as the basis of discussions around the review of the licence fees and efficiencies.</li> </ul> <p><b>Actions</b>  <b>BM77(8)</b> Produce a licence fee options paper before the next Board and develop a timetable of delivery. <b>(NR)</b></p>
17.	<p><b>Remuneration Committee (REMCO), Pippa Greenslade</b></p> <ul style="list-style-type: none"> <li>• The REMCO Terms of Reference (ToR) have been amended. The committee is now called the People and Culture Committee. It will be closer aligned with the business plan, explore the overall reward of colleagues, and responsibilities around senior Civil Service remuneration sign off. Additional focus will be given to inclusion and diversity.</li> <li>• The proposals were agreed by EC.</li> <li>• The proposals were approved by the Board.</li> </ul>
18.	<p><b>Governance update, Sam Ireland</b></p> <ul style="list-style-type: none"> <li>• First and second line assurance checks have been documented in Compliance. SI has recognised a positive change in the GLAA's language and culture around assurance. SOPS and policies are being updated. Risk management is progressing well.</li> <li>• JM thanked SI and MB for their work.</li> <li>• MH suggested that the new Sponsorship Code of Good Practice will be helpful and provide a positive framework for this area of work.</li> <li>• SI thanked VM and his colleagues at GIAA for their support in the assurance work.</li> </ul>



19.	<p><b>Stakeholder Engagement update, <i>Frank Hanson</i></b></p> <ul style="list-style-type: none"> <li>• Upcoming stakeholder events will be a good opportunity for Board members to engage with GLAA colleagues.</li> <li>• A Gold Group has been established to coordinate prevention activities related to the crisis in Ukraine. Intelligence is currently being collected before any specific risks can be identified.</li> <li>• A film is being made with various operators of the seasonal workers scheme. The film will be cut in different ways to target various groups.</li> <li>• Investigators are introducing themselves to workers when they arrive in the UK, to promote the GLAA and its role in the sector.</li> <li>• JM thanked FH for his work and raised that generally NEDs are keen to visit where they can.</li> </ul>	
20.	<p><b>Sub-committee Minutes</b></p> <p><b>(a) Audit and Risk Committee – meeting held 29.04.22, <i>Suzanne McCarthy</i></b></p> <ul style="list-style-type: none"> <li>• SM outlined changes to the ARC Terms of Reference (ToR), as detailed in the paper.</li> <li>• It was agreed that it is acceptable for draft committee minutes to be circulated with Board papers for note.</li> </ul> <p><b>Decision</b></p> <ol style="list-style-type: none"> <li>1. The Board approved the proposed changes to the ARC ToR.</li> <li>2. The Board agreed that DJS will be the health and safety champion on the Health and Safety Committee.</li> </ol> <p><b>Action</b></p> <p><b>BM77(9)</b> Share minutes of recent Health and Safety meetings with DJS. <b>(EC)</b></p> <p><b>(b) Remuneration Committee – meeting held, <i>Pippa Greenslade</i></b></p> <ul style="list-style-type: none"> <li>• Nothing to approve.</li> </ul>	
24.	<p><b>Any other business</b></p> <ul style="list-style-type: none"> <li>• Margaret Beels, Director of the Office of the Director of Labour Market Enforcement (ODLME), and previous GLAA Board Chair, would like to attend the July Board meeting to discuss the themes of her new strategy.</li> </ul> <p><b>Action</b></p> <p><b>BM77(10)</b> Invite Margaret Beels to the July Board meeting. <b>(MS)</b></p>	