

Minutes

Title of meeting 78th GLAA Board Meeting

Date 18/07/2022 **Time** 10:15 – 15:30

Venue Microsoft Teams

Chair Julia Mulligan Secretary Megan Bethell

Attendees 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

In attendance Elysia McCaffrey (EM) CEO

Dan Scully (DS) COO

Darryl Dixon (DD) Head of the Single Enforcement Body (SEB) Programme

Emma Coxon (EC) Head of People and Change

Ian Waterfield (IW) Head of Enforcement Justin Rumball (JJR) Head of Finance Megan Bethell Governance Officer Nicola Ray (NR) Head of Compliance

Paul Coffey (PC) Head of Communications (Item 16 onwards)

Samantha Ireland (SI) Head of Governance

Margaret Beels (MB) Director of Labour Market Enforcement

Home Office Mary Halle (MH) Home Office Sponsorship Unit (HOSU)

attendees Simon Hookins (SH) Modern Slavery Policy Lead, Home Office

Observers Keith Rosser (KR) designate Board Member

Phil Cain (PHC) designate Board Member

Apologies Frank Hanson (FH) Head of Prevention

Michael Sewell (MS) Secretariat Officer

4	
1.	Introductions
	JM welcomed attendees and introduced two designate board
	members observing the meeting: Phil Cain and Keith Rosser.
2.	Apologies
	Noted as above.
3.	Minutes of the previous meeting held on 10 th May 2022
	 The minutes of the previous meeting, 10th May 2022, were agreed
	as an accurate record.
	DAS raised that in item 14 the line "Board members requested that
	key performance risks be explored in detail as separate agenda
	items at future Board meetings" should be altered to reflect that this
	referred to papers rather than an agenda item.
	JM said the Board needed to understand the enforcement team's
	action plan for delivering the business plan objective on
	enforcement and intelligence. JM suggested a deep dive ahead of
	the next Board meeting in November to which DAS agreed.
	SM stated the suggested deep dive would not impact ARC's deep
	dives.
	dives.
	Action
	BM78(1) Undertake a deep dive on enforcement to inform the Board (IW)
4.	Declarations of interest
4.	None.
5.	Action Points
5.	Action Foilits
	Action points closed:
	BM76(2), BM76(6), BM76(9), BM77(2), BM77(3), BM77(5), BM77(6),
	BM77(7), BM77(8), BM77(9), BM77(10),
	$DW(T)(T), \; DW(T)(\Theta), \; DW(T)(\Theta), \; DW(T)(\Theta),$
	Ongoing actions:
	Ongoing actions:
	BM74(4) – due to sickness these have been moved to August (JW).
	BM76(11) – JW has been in contact with DJS to start this work (JW/DJS).
	BM77(1) – DAS suggested this should not be closed until visits have
	taken place, which should be initiated by the GLAA. IW said he would ask
	colleagues to arrange visits with NEDs and to reassure them that such
	visits do not need to be the biggest job (IW).
	BM77(4) – discussion on this action below.
	PG suggested two things have been conflated in this action and
	there needs to be a separation between:
	 How the organisation uses vacancies to manage
	overspend/budgets, which is separate to work around
	vacancy planning and the associated costs.
	JM agreed with PG and stated the vacancy factor should not be the
	principal tool for budget management.
	 JM stated using the vacancy factor to manage budgets does not
	allow the organisation to think strategically. JM stated that this is
	separate to the target operating model work.
	 PG suggested to DS this could be picked up offline.
	EM to follow up separately.
	= 10 10.10.11 alp opposition.

6. **CEO update**, *Elysia McCaffrey*

- EM stated that the organisation is in a difficult position, being unable to tell colleagues about SEB developments.
- Before resigning, Minister Maclean approved the two new Nonexecutives for the Board and the 2022-23 Business Plan.
- EM thanked everyone for attending the People Seminar and shared positive feedback received by the Communications team.
- EM, DAS, JM and JJR attended the Home Office ALB seminar. EM will be following this up with an organisation called Black on Board to help improve Board diversity.
- EM and FH attended the Sharma Women's Centre in Leicester to give those who completed the Level 1 Award certificates.
- EM raised further changes in the Intelligence function and reported that SI will be coming to the Board for support on some of these changes.

7. Home Office, Update

- MH updated the Board on changes to ministers within the Home Office, which will impact HO work, but hopefully not the GLAA.
- Advice to Ministers on the review of the GLAA was submitted on the 29th of June. The likelihood of getting this back is now low.
- EM asked if the advice around additional powers for the GLAA had landed with the Home Sec and SPADs or if there was still an opportunity to make the case.
- SH shared that advice was pulled together in a short timeframe, and it
 was just initial options. The advice on additional powers was included.
 The next step will be to develop the options in more detail.
- JM felt the work needed to be expedited to fall in line with the timings of the Modern Slavery Bill.
- SH said he would speak with wider colleagues and pick up this work on wider powers.
- MH agreed with JM on the importance of timings and that by mid-September, there needs to be a good narrative around the GLAA's work, including how additional powers would be used.
- JM felt there needs to be greater recognition from the Home Office about the small size of the GLAA compared to its remit.
- SH shared that Helen Richardson, who was already part of the Modern Slavery Unit, has been successful in the temporary appointment to be the Senior Sponsor of the GLAA.
- JM asked about the issues with the telephone system. JJR shared that the latest advice from GLAA IT colleagues is that after extensive input, the fix has been successful.
- JM reiterated that two months without the phone system has been very challenging for the organisation.
- EM agreed with JM and asked that we learn lessons, which was noted by MH.

[Official and Sensitive information has been redacted from this section]

8. Director of Labour Market Enforcement Update, Margaret Beels

 MB's presentation covered the strategy for 2022-23, the strategy for 2023-24 and the DLME review of Operation Tacit.

- PHC thanked MB and asked if the timeframe around the Operation Tacit review would help provide an evidence base for the GLAA in relation to the Modern Slavery Bill and additional powers.
- JM asked when the findings of the review would be ready, considering the timings of the Modern Slavery Bill.
- MB said she would take away the request for the review to be fed into the GLAA in a timely manner.
- SM asked MB if there was any scope for the ODLME to support the GLAA with work such as research.
- MB has given this thought and suggested research should be undertaken by the ODLME, rather than the GLAA given their operational focus.
- JM said this was useful to know and could be built into the GLAA's strategic planning over the next six months.
- MB raised that the ODMLE has a number of steering groups in which the GLAA participates.
- MB asked for the GLAA's input into the ODLME 2022-23 strategy.
- JM thanked MB for presenting.

9. Finance update, *Justin Rumball*

- DAS asked for the balance sheet to be included in future updates.
- SM thanked JJR and asked for training on understanding the graphs.
- PG thanked JJR for the work and said it was a step forward.
- PG questioned the use of the vacancy factor to manage the budget.
 This could be a barrier to managers being able to control their own budgets effectively.
- PG raised inflation/cost of living and the ability of the organisation to make pay decisions. She was concerned that this could impact turnover and retention, which needs consideration.
- JJR agreed with both of PG's points.
- DAS welcomed the new finance report format and suggested the Board should see a balance sheet and cash flow statement at least twice a year.
- DAS also asked about the reduction of estate charges and whether the HO use the Nottingham office within the current lease.
- JJR confirmed that a couple of HO colleagues occasionally use the Nottingham office, but this should be formalised with the HO.
- JM asked how much is spent on office space that is not being used.
- JJR felt that this is still unclear as the hybrid model is still new.
- DJS noted the headings in the finance report were good and the data insight was particularly helpful.
- JJR highlighted the recommendation to review the scheme of financial delegation, and to come back to the NEDs.
- MH stated that the HO requires overspends to be discussed with them.
- JM asked to see the plan around moving away from the vacancy factor to manage the budget before November's Board.

Action

BM78 (2) Balance sheet and cash flow statement to be included in future reports. **(JJR)**

BM78 (3) Training for NEDs on understanding the financial reports. **(JJR) BM78 (4)** The plan on moving away from using vacancies to manage the budget to be shared with the Board before the next Board meeting. **(JJR)**

10. **Performance, Sam Ireland**

- Three measures are underperforming in Q1:
 - 1. 75% of stakeholders surveyed agree that GLAA has influenced the promotion of worker rights
 - 2. Increase the proportion of businesses inspected in the regulated sector
 - 3. 90% of Application Inspections are conducted virtually
- SI highlighted the work undertaken around Objective 1 and the development of the shellfish control strategy, which has been started by IW, as well as considering lessons learnt on car wash operations.
- DAS asked how many pieces of intelligence the GLAA is dealing with?
 How many investigations are going on and where they are in the country?
- SI could not say how much intelligence there is and highlighted the difficulty around extracting what is intelligence within general concerns.
- IW shared there were 386 ongoing investigations:

- The majority sit in south-east and two thirds of those sit outside the regulated sector.
- Most serious modern slavery cases are in the north-west relating to the care sector industry which are progressing to court
- JM stated that the Board has questions about Enforcement that cannot be covered adequately in this meeting and suggested that IW revert to the Board with timings and scope for a deep dive.
- DJS asked the extent to what the positive performance in Q1 is a surprise, or the outcome of careful action?
- IW replied that performance is not a surprise as work has been done
 to pro-actively seek opportunities with potential outcomes. One of the
 biggest changes in Q1 has been the speed intelligence is getting to
 enforcement teams as this improves opportunities for interventions
 due to the transient nature of workers.
- JM raised concerns around the control strategy: what it is based on and the number of control strategies.
- JM suggested that this work might link into the strategic planning to work with the ODLME and perhaps to involve the two new Board members given their experience and knowledge.
- PHC asked for the opportunity to better understand the intelligence set up at the GLAA.
- SI suggested the ToR for the deep dive on victims could be shared to help plan the deep dive on enforcement.

Action

- **BM78 (5)** the Board to be provided with timings and remit for a deep dive on enforcement. **(IW)**
- BM78 (6) PHC's NED induction to include time with SI and IW to better understand intelligence and tasking ahead of the Strategy Day. (SI/IW)

11. 6-month People Survey, *Emma Coxon*

- EC shared the following updates:
 - Employee Relations issues are taking up a lot of HR's time, which takes away their ability to undertake proactive work.
 - 85% of the organisation are actively engaging with the STAR Rewards platform.
 - Moving towards giving 'spot rewards' in the form of vouchers using a small percentage of the bonus budget to recognise good work taking place.
 - Lots of activity around wellbeing, including 'time to talk' sessions in September, and committing to the mental health at work pledge.
 - Equality Diversity and Inclusion policy launched and other policies in progress.
 - Retention and destruction work ongoing to limit the organisation's GDPR risks.
 - Union recognition agreement in place now and is working well, especially from a policy approval perspective.
 - A focus will be the pay remit, particularly considering employee retention in lower grades.

- PG recognised the work EC, the People and Change team and LT are doing in this space. PG asked if EC or the LT members had any measures in mind to capture the impact of this effort.
- EC raised the slight uplift in satisfaction from 69% to 71% in the People Survey. But that the organisation might need to prepare for a drop in satisfaction due to future change. EC also shared that HR intend to start well-being focused 'pulse surveys' to capture how people are feeling more generally.
- PG agreed that the pulse approach is good.
- EM noted the small size of EC's team and raised the need for a robust plan to deal with the employment relations issues.
- PG shared that if grievances are a result of calling out bad behaviour, then the Board is supportive of this.
- JM asked if the Home Office's support for HR has been sufficient and was reassured by EC that when asked, they have been supported.

12. Regulation performance

- NR updated the board on the work of the Regulation Gold Group. The
 first continuous improvement workshop session was aimed at
 Compliance Investigators guided by Laura Thomas (LaT) and SI. The
 workshop resulted in an action plan and identified key improvements.
 The second workshop is scheduled in September.
- Two new starters are joining the Compliance team in August and an induction process has been mapped out.
- Compliance and licensing have focused on improving data quality ahead of performance data being developed.
- The Licensing team are continuing with sprints to clear backlogs.
- NR said resourcing issues in the Intelligence team have exacerbated the delay in licensing checks. A decision has been made to reduce the level of checks for licence applications and the team will look at what impact this might have on decision making. A sprint may be planned to deal with the backlog caused by delays.
- JM thanked Nicola and her team for the work they are doing and noted that this is encouraging.
- EM felt that the team has viewed this as an opportunity and is taking a risk-based approach to removing some of the checks.
- DJS would like Board members to be given a better understanding of the questions raised in paragraph 5 of the Compliance Strategy.
- DJS observed that it would be helpful to know the extent to which this
 work is addressing some of the criticisms made by ALP in the
 November Board meeting, or if this work was exposing that some of
 these criticisms may have been unjustified.
- DJS said he would like to come back to the question to what extent does licensing contribute to reducing labour exploitation.
- DAS thanked NR and her team and welcomed their openness to reform.
- PG noted it is important to think about transitioning from focus stage to the steady state stage, and a need to consider having a backup resourcing plan.
- PG also queried whether a 'we said, you did' response to the ALP would be a potential engagement opportunity.

- SM noted that we should go back to the ALP to show we have listened but be clear on what can be achieved in the circumstances.
- SM suggested that the LT should consider what areas of the organisation could benefit from a similar improvement process to improve value for money and efficiency.
- EM noted the continuous improvement workshop went very well and it was a good opportunity to use the training LaT and SI had done. SI is planning to run similar sessions with the Intelligence team to see what works well and can be replicated across the organisation.
- MB noted that the compliance strategy was something the organisation committed to when she was GLAA Chair. It is important the GLAA explains anything it has decided not to do since publishing the Strategy.
- JM would like to see timings in the action plan NR mentioned. JM would like the Board to understand how the action plan relates to the delivery of the compliance strategy and business plan.
- JM would like to understand how inspections are targeted and the rationale behind them, asking whether steppingstone targets would be helpful.
- JM questioned why it takes six months to train a new starter in Compliance.

13. Licence Fees Options, *Nicola Ray*

- SM noted that the GIAA had concerns about how realistic it would be for the GLAA to increase its licensing fees.
- MH said to be cautious about comparing the work of the GLAA to other licensing authorities. MH noted this work needs to be done so the GLAA can better understand the gap in its funding because currently public money is subsidising the market. MH cited two organisations that are fully fee funded (Disclosure and Barring Service and Security Industry Authority)
- MH noted there are a lot of potential options for fee models, and decisions should not be made before this work is done.
- JM suggested SM can go back to the GIAA auditor to allay his fears.
- PG expressed concerns that public money is cross subsidising an aggressive industry and is supportive of the work.
- PGs initially favours a 'flat fee', as smaller organisations often require more work, for simplicity.
- DAS supports the business case for this work if it leads to a more efficient organisation in the future.
- SM agreed with PG's point on subsidising the food industry and favours a cost neutral licensing scheme. SM also noted that it would be helpful to look at the fees in relation to the cost of licensing activity only.
- NR noted the exercise is specifically to look at the licensing cost, but some licensing processes sit out of the regulation team, so they must; consider the apportionment of related costs.
- MH said there is a risk that the GLAA limits its opportunities and should consider the bigger picture. MH noted the GLAA needs to work with the Home Office on this and urged the GLAA to look at the work more broadly.

	JM noted the importance of looking at external examples, and the important role of the target operating model in this work.
14.	Stakeholder Q1 update, covered by Paul Coffey
	In relation to the paper, SM shared that in the LU/LP webinar
	questions were either answered in the webinar or immediately
	afterwards.
	SM strongly supports the idea of changing the LU/LP to an online webinar.
	JM felt Board members have not been utilised any differently since the
	stakeholder workshop and would like to see evidence of how
	relationships with stakeholders are being managed strategically.
	PC noted this.
	Action
	BM78 (7) Send the link to the Seasonal Workers Pilot (PC)
15.	Governance, Samantha Ireland
	(a) Q1 Governance update, Samantha Ireland
	GIAA audit on licensing is currently ongoing.
	SM raised a concern that delegating the overseeing of strategy
	development to specific Board members at the initial stage, might
	mean other Board members will not be sufficiently sighted.
	JM agreed and suggested she would pick this up with EM and asked
	about the timing, to which SI responded that the plan is to be
	published on 31st March 2023.
	 DJS agreed with SM and said we are a stronger group together. DJS
	suggested the Board discuss the strategy in the absence of the LT.
	JM shared that she is setting up some NED-only meetings, one of which will be before the strategy day.
	which will be before the strategy day.
	 JM agreed that key milestones for the strategy development would be useful.
	userui.
	Action
	BM78 (8) NEDs to meet ahead of the strategy day. (JM)
	BM78 (9) SI to put together key milestones for the strategy development (SI)
	(b) Approval of complaints policy
	(b) Approval of complaints policy
	Decision
	Board approved the complaints policy
16.	Risk matters arising
	(a) Intelligence risk, Sam Ireland and Justin Rumball
	SI shared that Intellishare is not supported an anticipated that it may
	disappear in September. The system is fundamental and at this point,
	alternatives (iBase and Crimson) have not been tried or tested, which
	is why the risk remains high.
	 JM asked if Crimson or iBase are fit for this purpose and was advised
	by DS that neither are ideal. Work on procuring an alternative -
	Phoenix Connect – had been considered but not fully progressed.
	• • •
	JM raised a concern that this work has not been picked up DS suggested that maying ante iBase is much guidler, but to get the
	DS suggested that moving onto iBase is much quicker, but to get the
1	
	two systems integrated is a much bigger piece of work.
	 two systems integrated is a much bigger piece of work. PG commented that in a resource-exhausted organisation, putting in a system that is not ideal is a concern.

- DAS asked if this issue could positively or negatively affect the good performance on the operational outcomes.
- IW said it shouldn't do but iBase as an alternative has not been tested and it depends on how quickly they can get people trained up.
- JJR said the issue has been considered for a long time and Home
 Office support has not been sufficient, as Intellishare is hosted within
 the HO. However, over the last few weeks support has been agreed,
 which should give some reassurance around the impact on GLAA
 resources. This comes at a potential cost, which needs clarifying. JJR
 agreed it is a concern and disappointing that there are various parts of
 Intellishare which are already dropping off before the upgrade can be
 put in place.
- PHC asked if a conversation had been held with the Home Office around carrying the risk a little longer, whilst the larger project is finalised. DS noted this was a good idea.
- PHC suggested whether all patches have been explored for a shortterm solution.
- JM raised that if time, effort and resources are being spent on this rather than the longer-term solution then this would be a concern.
- JJR agreed there is a balance of risk and spend.
- JM asked when did the HO start ramping up the pressure on this system.
- JJR suggested the risk has been there for a year, but the current cyber security concerns have increased focus.
- Whilst noting JJR's points, DS suggested going back to the HO to say
 we are closer commercially to the big picture solution and can we be
 pragmatic about staying on Intellishare.
- JM said we need to have a plan to show the HO we are on with it, to give them confidence.
- EM agreed to come back to the Board guickly with a plan on this work.

(b) Objective One internal audit action plan, lan Waterfield

- Audit action plan shared with ARC to address audit recommendations from GIAA. All SOPs and policies that support victim care have been through consultation and are in place subject to a three-month review. Victim SOP training complete by 02 August 2022. Bespoke victim training for investigators.
- GIAA action plan is complete.
- The Victim Navigator provides support to victims and signposts them to services.
- JM asked what is in place to evaluate the effectiveness of the Victim Navigator which includes victims' ability to cope and recover from their experience.
- IW highlighted performance measures in the initial HO bid.

Action

BM78 (10) To develop a plan on the IntelliShare work to inform the Board. (JJR/DS)

17 Sub-committee Minutes

- (a) People and Culture Committee meeting held 23.06.22, *Pippa Greenslade*
- PG asked for support on how the work done with colleagues can be used to enhance the organisations culture.

- DAS raised a concern about the Board receiving redacted minutes from the People and Culture committee.
- PG explained the redaction related to the specific pay of an individual as outlined in the committee's remit. PG said she thought this was set out in the terms of reference of People and Culture committee.

Action

BM78(11) Look into DAS's request to find a way to provide an unredacted version of the People and Change committee minutes (**PG**)

(b) Audit and Risk Committee – meeting held 22.06.22, Suzanne McCarthy

- ARC are recruiting for an independent member of the committee.
 Three applicants will be interviewed by SM, DAS and SI on the 05/09/22.
- The audit opinion for this year is limited.
- The Home Office is having a meeting for the Chairs of Audit committees on 3/08/22. However, SM is on holiday and so SI has agreed that a staff member will go instead.
- MH shared that she thought this meeting would be moved due to the issue of leave in summer.

Decision

1. The Board approved a change of committee name from Audit and Risk Committee to the Audit and Risk Assurance Committee.

18. Any other business
None