



Gangmasters &
Labour Abuse Authority

GLAA Business Plan 2025-26

Stopping worker exploitation

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Foreword



Elysia McCaffrey, *Chief Executive Officer*



Julia Mulligan, *GLAA Chair*

This is the third and final business plan to deliver the Gangmasters and Labour Abuse Authority's 2023-26 strategy. The last two years have been transformative as we have sought to provide an exceptional service to the public, businesses and workers in the fight to stop worker exploitation.

We have:

- Streamlined our organisation structure to enable us to appoint leaders who are inspiring, professional, and skilled.
- Redesigned the operational delivery model, bringing our skilled officers together to share expertise and improve resilience.
- Implemented a more robust and effective approach to regulation, clearing all licensing backlogs and reducing the time taken to issue a new licence by 81%.¹
- Initiated 121% more compliance inspections.²
- Maintained a victim centric approach, demonstrated by 98% of victims assigned to our Victim Navigator remaining fully engaged.
- Created a high-performing, inclusive organisation which includes the number of colleagues who report being from a minority ethnic background increasing from 6 to 10.6%.³
- Strengthened our decision-making, governance and accountability arrangements, giving us and others in government the confidence that we are operating effectively and efficiently.

GLAA colleagues have risen to the challenges faced, consistently demonstrating our values and our desire to deliver the best possible services to the people who need them.

In 2025-26, we will build upon these successes. We will increase and improve our approach to intelligence, targeting more unlicensed gangmasters and using our

¹ A reduction from 225 working days in 2023-24 (which included our backlog) to 42 working days in 2024-25.

² CIs tasked have increased to 168 (76, 2023-24), and CNBs tasked increased to 76 (1, 2023-24).

³ This is a percentage of the total workforce.

powers to stop unlicensed activity. We will disrupt criminals and prevent worker exploitation through increasing the use of criminal prosecutions and civil disruption orders. We will continue to deliver all our work with the needs of vulnerable people at the heart of what we do, while also ensuring the best value for taxpayers.

The government has pledged to establish a Fair Work Agency which will bring together existing enforcement functions including the responsibilities of the GLAA, the Employment Agency Standards Inspectorate and National Minimum Wage enforcement. At the end of this Business Plan the GLAA will be in the best possible position to transition into this new body, helping to ensure that it delivers on ministerial ambition, and delivers even greater improvements in the fight to stop worker exploitation.

We are both incredibly proud of the journey that the GLAA has been on in recent years. The GLAA has delivered significant transformation and huge performance improvements that have ensured that victims are genuinely at the heart of our approach. We are coming into this final year with a huge sense of pride for everything that the GLAA has achieved, and excitement for the next chapter.

Introduction

This business plan explains how we will deliver the final year of our three-year strategy. When we wrote our strategy, we said it “*requires us to change how we work and organise ourselves to remain true to our mission and to enable us to navigate future change and challenge*”. Since then, the GLAA has undergone significant transformation, successfully improving our performance.

We are on course to achieve our strategy and will continue to take a victim centric approach to stopping worker exploitation in the coming year.

In this final year of our strategy, we have three key objectives:

- Increase and improve intelligence on worker exploitation through making the most of each operational encounter.
- Target more unlicensed gangmasters, using our powers to stop unlicensed activity.
- Increase disruption of criminals and further prevent worker exploitation through increased criminal prosecution and civil disruption orders.

Alongside these objectives, we will:

- Reduce the burden on taxpayers by increasing licence fees and recovering a greater proportion of licensing costs incurred.
- Progress our data improvement plan to improve processes and better utilise the data we have, to aid decision making and influence policy.
- Enhance staff engagement, improve diversity and inclusion, as well as our learning and development through the continued delivery of our People Strategy.

In the final year of our strategy, we must also consider the need for a smooth transition to the Fair Work Agency (FWA).

Our Strategy

The GLAA’s three-year strategy arose from a fundamental re-appraisal of our work and organisation. We focused on our statutory functions and core remit, prioritising the areas in which we can have the most impact.

Our Strategic Goals

This new business plan directly supports the continued achievement of our three strategic goals:

Goal 1: Be a robust and effective regulator.

Regulation is our core business, and we will ensure it is resourced appropriately and operates effectively.

Goal 2: Be known as experts in addressing worker abuse and exploitation.

We will use our analytical and intelligence capabilities to develop and expand key activities, ensure we can prioritise our work and share our expertise to inform policy and practice.

Goal 3: Be an essential enforcement partner.

We will prioritise our enforcement operations through our strategic risk assessment, and work in collaboration with partners to tackle serious worker exploitation and abuse in line with those priorities.

Alongside these strategic goals, we have several key deliverables to manage our people and resources effectively.

Year three: Consolidating for the Future

In year one, we dealt with the significant issues that were having a negative impact on our performance. We **transformed** the organisation. In year two, we **built** on our success and improved performance further. In year three the GLAA will **thrive**.

The creation of the FWA brings uncertainty for our people. However, we are committed to achieving the best performance possible and will ensure a smooth transition to the FWA.

Our Plan

Strategic Goal 1: Be a robust and effective regulator.

Our licensing team has made real progress by embedding a robust pre-tasking system, to enable the proactive identification and initiation of criminal investigations based on early signs of serious potential non-compliance and criminality. Through disrupting illegal activities at an earlier stage, we can limit their impact, and ensure victims receive timely support and intervention. Our objective for 2025-26 is to consolidate the improvements made in years one and two, to deliver a consistent, reliable, and quality service. We will also focus on exposing organisations operating illegally without a licence and hold them to account.

In April 2025, the GLAA licence fee increased for the first time since 2009. This necessary step will ensure we can continue to be a robust and effective regulator, as well as meet Treasury rules. We will ensure that we are receptive to feedback from key stakeholders and are delivering an efficient system of regulation.

How we will deliver our plan in 2025-26:

Objectives (How can we improve?)	Key Activities (How will we achieve this?)	Outcomes	Measures & Targets (How do we measure success?)
Deliver a consistent, reliable, and quality licensing service	<ul style="list-style-type: none">Progress applications within agreed timeframes.Deliver targeted compliance inspections.Analyse compliance inspection timeframes to identify opportunities for improvement.Review the licence holder risk profile quarterly.	<p>Consistent application times and minimal complaints from licence applicants regarding timeliness.</p> <p>Non-compliant businesses identified earlier; appropriate action taken which is proportionate but robust.</p> <p>We identify opportunities for continuous improvement.</p>	Reduce the target median time taken to make application decisions to 50 working days by March 2026.

	<ul style="list-style-type: none"> Inspect every licence holder that is a new trading business. Embed GLASS across operational teams. 	<p>The way we inspect remains fit for purpose.</p> <p>Businesses are inspected once they start operating to protect workers and support business compliance.</p> <p>We can extract more accurate licensing data easily, improving our efficiency.</p>	10% of businesses are inspected by March 2026. ⁴
Use our powers to stop unlicensed gangmasters	<ul style="list-style-type: none"> Direct intelligence gathering on unlicensed gangmaster activity. Prioritise compliance inspection activity on the highest risk businesses. Deliver targeted activity focused on unlicensed gangmasters and aligned to control strategy priorities. 	<p>We are better informed about the practices and prevalence of unlicensed gangmasters.</p> <p>Our investigators consistently act upon intelligence to disrupt non-compliant businesses, stop worker exploitation, and protect victims.</p> <p>Unlicensed gangmasters are exposed and held to account, ensuring a level playing field for compliant businesses.</p>	A 15% increase in the number of investigations related to unlicensed gangmasters by March 2026. ⁵
Increase awareness of our work across our regulated sectors and support	<ul style="list-style-type: none"> Maintain key stakeholder forums for open communication with the regulated sector. Monitor and report any impacts of the GLAA licence fee 	<p>Key stakeholders trust and have confidence in the GLAA.</p> <p>GLAA licence holders are informed about the fee increase and we can</p>	A 25% increase in attendance of our Stakeholder Online Seminars by March 2026.

⁴ This reflects all inspection activity and as a % is based on licence holders and applications.

⁵ The Gangmasters (Licensing) Act 2004 introduced offences Section 12(1&2) and Section 13(1). Section 12(1) is to operate as an unlicensed gangmaster, Section 12(2) is to possess false documentation and Section 13(1) involves entering into arrangements with an unlicensed gangmaster.

businesses to be compliant	<p>increase on businesses in the regulated sector.</p> <ul style="list-style-type: none"> • Provide an accessible and responsive Contact Centre. • Drive engagement with the GLAA through interesting content and effective communication. 	<p>understand any impacts from the fee increase to inform future fee models.</p> <p>The public and our partners can contact the GLAA easily and get the advice they need.</p> <p>Increased awareness of the GLAA and specific issues affecting the regulated sector.</p>	<p>All Contact Centre staff have received training on dealing with difficult situations by March 2026.</p>
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Strategic Goal 2: Be known as experts in addressing worker abuse and exploitation.

In the past two years we have focused on improving our intelligence model and governance processes to expand our understanding of high-risk worker exploitation and abuse, particularly in the most high-risk areas. In 2025-26, we will focus on further improving our intelligence processes to make the most of partnerships and maximise every encounter during operational activity to improve our intelligence picture, our control strategy and emerging threats. Improving the quality and management of our data has been an ongoing focus throughout this strategy. In 2025-26, we will focus on implementing changes to how we collect, record and access information and intelligence. We will have a particular focus on understanding how women and girls are exposed to additional vulnerabilities and ensure our colleagues are best placed to understand the impact, designing policies and processes which help to mitigate multiple types of discrimination faced by exploited workers.

How we will deliver our plan in 2025-26:

Objectives	Key Activities	Outcomes	Measures & Targets
Gather, develop and utilise intelligence to improve outcomes for victims	<ul style="list-style-type: none">Establish productive intelligence partnerships to enable more effective tasking.Align intelligence collection plans with the control strategy.Embed a proactive approach across operational teams to align intelligence gathering to the intelligence collection plans.Monitor how effectively Intelligence packages lead to	<p>Our teams are aligned with external partners focused on stopping worker exploitation.</p> <p>We focus our intelligence gathering on high-risk areas, further allowing evaluation of our control strategy.</p> <p>Operational teams are effective and consistent in gathering intelligence.</p> <p>We see a direct impact of our intelligence work on outcomes for victims.</p>	A 10% increase in internally generated intelligence reports ⁶ across 2025-26.

⁶ Internally generated intelligence relates to the intelligence that operational colleagues at the GLAA create during their day-to-day activities.

	investigations or partnership referrals.		
Modernise our intelligence and case management processes and systems	<ul style="list-style-type: none"> • Undertake a comprehensive data cleanse of our intelligence and case management systems. • Implement changes to our intelligence management system so it is fit for purpose and user friendly. • Streamline our approach to information management, overseen by our Information Management Group. 	<p>The operational data we hold is legally compliant.</p> <p>Improved consistency in information recording, minimising errors and enhancing the reliability and accessibility of our data.</p> <p>Information governance and accountability is improved creating greater transparency and efficiency in managing the information we hold.</p>	
Share our knowledge and expertise to inform and influence.	<ul style="list-style-type: none"> • Deliver our Stakeholder Engagement and Communications Plan. • Utilise partners' data to develop a considered and robust Strategic Intelligence Assessment. • Publish relevant briefs that focus on current and emerging trends in worker exploitation. • Identify, target and engage key partners to share expert knowledge through expert 	<p>We maximise engagement with public sector, business and NGO stakeholders.</p> <p>The Strategic Intelligence Assessment offers vital insights, trends and knowledge gaps on worker exploitation in the UK.</p> <p>We develop and share our own understanding of current and future threats.</p> <p>We proactively share our expertise and knowledge with professionals engaged in stopping worker exploitation.</p>	<p>An average of 6% engagement score across all social media channels by November 2025.</p> <p>Publish four briefs on worker exploitation by March 2026.</p>

	<p>input, speaking opportunities and partnership activities.</p> <ul style="list-style-type: none"> • Develop our understanding of the additional vulnerability faced by exploited women and girls. • Deliver an educational video in partnership with Justice and Care for international workers in the care sector. 	<p>We are properly informed about additional vulnerabilities experienced by women and girls, which informs the way we support victims.</p> <p>International workers thinking of applying to work in the UK care sector and watch this video are informed of their worker rights and know where to seek help if they are mistreated.</p>	
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Strategic Goal 3: Be an essential enforcement partner.

In the first two years of our strategy, we reshaped our operational model to be more agile and able to effectively respond to worker exploitation. We further developed partnerships with strategic enforcement agencies such as the National Crime Agency and Regional Organised Crime Units, and NGOs such as Justice and Care, to ensure our expertise is utilised in joint activities tackling the exploitation of workers.

In 2025-26, we will continue to develop our strategic partnerships, ensuring the GLAA is working effectively to prevent and disrupt criminals who exploit workers. We will continue to prioritise the needs of victims of modern slavery and exploitation and evaluate the impact of our enforcement activities.

How we will deliver our plan in 2025-26:

Objectives	Key activities	Outcomes	Measures & Targets
Invest in strategic partnerships aimed at disrupting criminal behaviour	<ul style="list-style-type: none">• Prioritise and review established partnerships.• Identify partnership gaps.• Ensure 4P Plans are reviewed and updated regularly considering any recommendations shared at the Tactical Tasking and Co-ordination Group.• Make best use of analytical resources to exhaust all avenues for disruption.• Ensure the processes for using enforcement and disruption	<p>The partnerships we have developed are robust and effective leading to better outcomes for victims and increased prosecutions of those who exploit.</p> <p>Our 4P Plans are fit for purpose and result in proactive operational activity aligned to our control strategy priorities.</p> <p>We are efficient in the use of our tactics to disrupt criminal behaviours.</p> <p>We are maximising opportunities for disruption.</p>	Increase investigations that result in a criminal or civil disruption outcome by 5% by March 2026.

	tools are consistent across the GLAA.		
Victims remain central to our work and are prioritised in operational activity	<ul style="list-style-type: none"> Continued investment in the Victim Navigator programme. Case studies from the Victim Navigator programme are shared internally. Deliver lessons learnt material focused on victim support during an investigation and share with other agencies involved. Equip colleagues at every stage of an investigation with training, skills and support to effectively identify the additional vulnerabilities that workers may have and respond supportively. Deliver prevention activities focused on exploitative recruitment practices. Review referral pathways from our contact centre for victims reporting sexual abuse and/or sexual exploitation. 	<p>Our Victim Navigator programme continues to bridge the gap between enforcement and victim support ensuring victims remain engaged with investigations.</p> <p>We contribute to a better understanding of victim support and learn from our experiences.</p> <p>Our colleagues are confident in prioritising victims' needs and feel supported when dealing with challenging situations.</p> <p>Improved shared learning across agencies of responding to victims.</p> <p>Victims that come forward to report sexual abuse are provided with appropriate support. This would reduce the risk of victims falling through the safeguarding system.</p>	95% of victims assigned to the Victim Navigator are engaged in our investigative process by March 2026.

Our People and Resources

In the past two years, the GLAA has delivered significant change. The launch of the People Strategy has set out clear goals for creating a highly productive workplace. This year, we will continue to deliver key commitments of the People Strategy, with a particular focus on culture, engagement and learning and development. We will also improve our organisational governance through delivering key improvement projects on data, assurance, and accountability.

How we will deliver this in 2025-26:

Objectives	Key Activities	Outcomes	Measures & Targets
Deliver key People Strategy commitments.	<ul style="list-style-type: none"> • Work with employee forums and use People Survey results to improve employee engagement across the GLAA. • Review and undertake improvements for collating and communicating leaver feedback to improve retention. • Reform and simplify our absence management processes. • Improve the Learning and Development offer to support the employee experience as well as candidate diversity during recruitment. Specifically, rolling out PIP Level 1 training and a 	<p>An increased sense of unity and alignment across the GLAA.</p> <p>Improved retention of essential skills and experience.</p> <p>Upskilling management, an increased sense of psychological and physical safety and a reduction in absence/sickness.</p> <p>Improved line management capability, new professionalisation routes for retention of employees and increased diversity of operational new joiners.</p>	<p>Ensure employee engagement remains above 74% in relation to 'sense of belonging' by March 2026.</p> <p>Reduce working days lost due to sickness to 6.5 days per person by March 2026.</p> <p>Increase gender diversity in Operations to 45% female by March 2026.</p>

	management development program.		
Deliver an effective and efficient service within available funding and resources	<ul style="list-style-type: none"> • Implement the GLAA licence fee increase. • Analyse and utilise the cost of key activities to better inform strategic decision making and demonstrate efficiency. • Devolve budgets to Directorates, where possible. • Maximise the integration and automation of our People systems. 	<p>The GLAA meets 'Managing Public Money' principles.</p> <p>Better informed strategic decisions on prioritising activity.</p> <p>Reduces the burden on the finance team and speeds up decision making.</p> <p>Increased automation and efficiency in our Corporate Services teams.</p>	Deliver the service within 1% of the overall budget by March 2026.
Strengthen our organisational governance.	<ul style="list-style-type: none"> • Progress the Data Quality Improvement programme. • Develop and embed the refreshed Assurance Plan which integrates Functional Standards. • Upskill our leaders through direct engagement and training to improve and embed our accountability framework. 	<p>Data improvement projects are prioritised with appropriate oversight.</p> <p>Assurance is embedded across the organisation as business as usual.</p> <p>Our risk maturity improves, assurance increases and there is shared ownership of key governance activities.</p>	Deliver three awareness sessions to our leaders on assurance, risk and good governance by March 2026.

Budget

For 2025-26 the GLAA has a total budget of £7.5m. We forecast that we will generate £1.7m in fee income from our licensing activities. This may be affected by the licence fee change implemented in April 2025. This is a necessary change the GLAA must implement to ensure we move towards compliance with HM Treasury's 'Managing Public Money' rules. We will have to monitor the impact this increase will have both on the businesses we licence and on the GLAA's income.

The remaining £5.8m comes from taxpayers via our sponsoring department, the Home Office. This includes a one-off increase of £250,000 to support our challenges. We have also been given a capital allocation of £130,000.

The GLAA Board has oversight of the budget, and responsibility for ensuring the delivery of the strategic plan. The Finance and Performance sub-committee provides the Board with assurance that annual spending and income generation aligns with the delivery of our business plan. As Accounting Officer, the CEO is responsible to the Permanent Secretary for our financial management.

The Executive Team will manage the GLAA's budget, performance and delivery through the Management Board. This robust governance structure provides a framework for overall decision-making, to ensure greater financial control.

Challenges, Risks and Opportunities

Our workforce is around 113 people, with which we must deliver a national service. Partnership working has always been essential, but with fewer enforcement officers, we must rigorously focus on our specialist remit of tackling serious labour exploitation, and work in partnership with the police and others to tackle wider issues of modern slavery. We are experts in our field, and can support partners, influencing activities and outcomes to disrupt criminal activity, protect victims and prosecute offenders.

In previous business plans, we explained that constrained capacity and resources risks positive performance and delivery of outcomes. Despite the successful transformation work we have undertaken, resource and capacity challenges remain.

The GLAA has taken steps to be as lean as possible. This means we are vulnerable to unexpected financial pressures, which may reduce our resilience and impact the delivery of this plan. We may face difficult decisions to prioritise activity to identify and support victims of labour exploitation, potentially placing them at greater risk.

Governance

As a public body it is important we explain how we measure, report and are held accountable for delivering this business plan. To measure our progress, we have developed a set of key performance indicators, which are reviewed annually to drive

our performance. Our Executive Team is collectively responsible for the delivery of our strategy and business plan and are held to account by the GLAA Board.

Through the Management Board, the Executive Team monitor performance, resolve challenges, and make strategic decisions to ensure the business plan is delivered. Progress is reported to the Finance and Performance sub-committee, which was introduced last year, who scrutinise progress, challenge the Executive on key milestones and performance and provide assurance to the Board. In addition, we report on our achievements in our Annual Report and Accounts which is laid in Parliament and are accountable to the Minister for our overall efficiency and effectiveness.

Forum	Responsibilities	Reporting frequency
Home Office Sponsorship	Gain assurance and maintain overall oversight for delivery.	Quarterly
GLAA Board	Set the GLAA strategy and annual business plans. Make decisions on the delivery of the business plan.	Bi-Monthly (every other month)
People and Culture committee	Review and monitor key measures against progress of the People Strategy.	Quarterly
Audit Risk and Assurance committee	Provide assurance on matters of risk, control and governance. Manage the process of the Annual Report and Accounts (ARA).	Quarterly
Finance and Performance Committee	Scrutinise service delivery performance, including monitoring key milestones and indicators material to the achievement of the strategy and business plan.	Quarterly
Management Board	Executive Team owns the business plan and strategy, scrutinise performance and make decisions on any mitigating actions required to ensure the delivery of the business plan and strategy.	Bi-Monthly (every other month)

Measuring our Impact

Delivery of this business plan will be measured against the following Key Performance Indicators:

Key Performance Indicators	2024-25 Outturn	Target
Goal 1: Be a robust and effective regulator		
Reduce the target median time taken to make an application decision.	42 working days	50 working days
Total businesses inspected	9.2 per cent (119 inspections)	10 per cent (129 inspections)
Increase the volume of investigations targeting unlicensed gangmasters.	57	65
Increase attendance of our Stakeholder Online Seminar.	170 attendees	215 attendees
Goal 2: Be known as experts in addressing worker abuse and exploitation		
Increase internally generated intelligence.	30 per cent	40 per cent
An average engagement score of 6% across all social media channels.	6.7 per cent	6 per cent
Publish briefs on labour exploitation.	0	4
Goal 3: Be an essential enforcement partner		
Increase investigations that result in a criminal or civil disruption outcome.	10 per cent	15 per cent
Victims assigned to our Victim Navigator are fully engaged in our investigative process.	98 per cent	95 per cent
Goal 4: Our People and Resources		
Ensure employee engagement remains high in relation to 'sense of belonging'.	77 per cent	74 per cent
Reduce Working Days Lost due to sickness (per person).	9.1 days	6.5 days
Increase gender diversity in Operations.	36 per cent female	45 per cent female
Deliver the service within 1 per cent of the overall budget.	-6.39 per cent	Within \pm one per cent
Deliver awareness sessions to our leaders on assurance, risk and good governance.	-	3

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