



Gangmasters &
Labour Abuse Authority

GLAA End of Year Performance Report

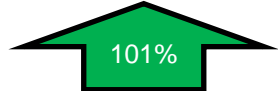
Reporting period: April 2019 – March 2020
Previous year April 2018 - March 2019


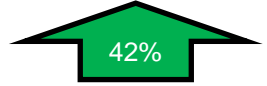

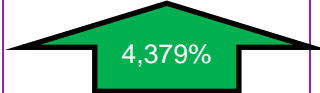

Public facing

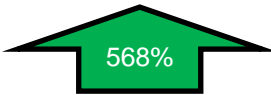
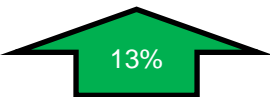
Table of contents

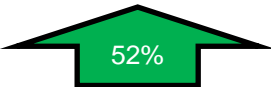
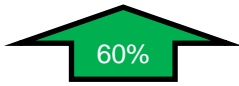
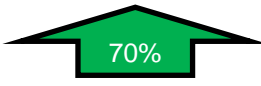
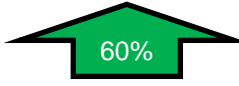
Business Plan Objectives	3
Prevention	13
Licensing.....	13
Compliance.....	14
Appeals.....	16
Communications.....	17
Business Change.....	18
FOIs.....	19
Protect	20
Intelligence.....	20
General Issues (referrals).....	21
Identification and Support of Victims	22
Tier 1 Intervention.....	22
Pursue	24
Enforcement and NSO Investigations.....	24
Arrests and Warrants.....	25
Closed Investigations.....	26
Glossary	26




Business Plan Objectives


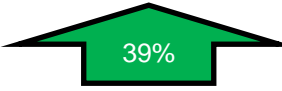
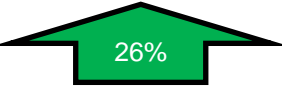
Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
1. Identify and support victims of labour exploitation	To work towards prioritising victims as part of our investigations	Potential victims assisted (directly/indirectly)	Potential victims identified as part of enforcement activity - 1,658	To increase the effective identification by 10%	Potential victims identified as part of enforcement activity – 2,091
			Potential victims of licensing standard breaches identified – 5,738		Potential victims of licensing standard breaches identified – 13,005
			Potential victims providing intelligence to the GLAA – 154		Potential victims reporting intelligence to the GLAA – 90
			Total = 7,550		Total = 15,186
					


Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
			NRM submissions = 33 (plus 13 assists) MS1 submissions (duty to notify) = 34 (plus 19 assists)	To increase the overall number of NRM and MS1 referrals by 10%	NRM submissions = 7 (plus 23 assists)  MS1 submissions = 55 (plus 20 assists) 
		Numbers of Tier 1 resolution	72 (i)	To increase by 20%	Tier 1 resolutions = 39 
		The overall number of workers affected	53 (i)	To increase by 20%	Number of workers = 2,374 
		Withheld wages and Holiday pay recovered	Withheld wages = £2,134	To increase by 25%	Withheld wages = £2,298.49 

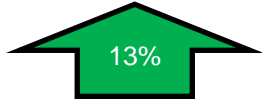

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
			<p>Holiday pay = £13,823</p> <p>A further £3,286.23 does not differentiate between.</p>		<p>Holiday pay = £92,329.51</p> <p> 568%</p> <p>A further £46,492.03 does not differentiate between.</p> <p>£25,485.27 'other' e.g PPE, non-monetary, and non-GLAA sector recoveries (including holiday pay).</p>
2. Maintain a credible licensing scheme, creating a level playing field and promoting compliant business growth	To address the time it is taking to process a licence application, ensuring this is kept to the standard	Days taken to complete licensing applications, broken into sections of process from the licence fee being cleared to the licensing decision being made	Average for 18/19 = 76 Working days	<p>The overall target is by March 2021 to reduce the average of 50 days</p> <p>The Mid-point target is 68 days by March 2020</p>	<p>Average of 2019-20 (19-20 tasked cases only) – 66 days</p> <p> 13%</p> <p>Note – Some cases still ongoing and may increase average duration.</p>

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
	To review the time taken to complete a compliance investigation, allowing us to target persistent non-compliance in the regulated sector	Days taken to complete compliance investigations, broken into sections, from date raised to report submitted to licensing for a decision	Average 18/19 = 185 days	The overall target is to reduce to 90% in 90 days by March 2021 The mid-point target is to reduce to 90% in 166 days by March 2020	Average of 2019-20 (19-20 tasked cases only) – 88 working days  Note – Some cases still ongoing and may increase average duration.
	To review time taken to make licensing decisions	Days taken to make licensing decision once all information is available	Revocation = 15 days ALC = 10 days Straightforward grant of Licence = 5 days	To Improve by 10% to 14 days, 9 days, and 4 days respectively	Revocation = 6 days  ALC = 3 days  Straightforward grant of Licence = 2 days 

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
3. Work in partnership with all stakeholders to protect workers' rights and prevent labour exploitation	To enhance engagement with key stakeholders within sectors deemed at high risk of labour exploitation, based on the nature and scale of those risks as assessed by GLAA intelligence	Numbers of protocols resulting from direct GLAA engagement	3	5 To add two new protocols in the coming year	Number of protocols = 3 
		Number of businesses signed up to protocols	Construction = 76 Apparel = 16 Retail = 3	Construction = 95 Apparel = 20 Retail = 4 To increase the number of signatories on each linked to measure below	Construction = 205 members ● Apparel = 19 members ● Retail = 3 ●
		Increase in the volume of intelligence submissions from those sectors	Construction = 51 Apparel = 10	An increase of 25% in the percentage of actionable intelligence	Construction = 24*  Apparel = 8* 

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
			Retail = 10 (ii)		Retail = 3*  *Please see General Issues/Referrals for another comparison.
	To increase awareness of modern slavery and labour exploitation through external training, engagement with stakeholders and amplifying messaging using social and traditional media	GLAA's level of activity across digital engagement channels and the accumulated reach	2,765 pieces of activity Average monthly impressions (no. of times content is displayed) 287,000	To increase the reach of social media by 5%	Average monthly impressions = 399,087 
4. Disrupt and deter criminal activity within the labour market	To work to increase the number of GLAA led enforcement investigations, whilst maintaining our work in partnership	Investigations undertaken by GLAA lead	No Undertaken =179	To increase the number of GLAA-led cases	Enforcement & NSO investigations = 226 

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
		Investigations Undertaken in Partnership	No Undertaken = 125	To maintain baseline at approximately 40% of cases	No Undertaken = 164 % of investigations in partnership = 47% 
	To address issues impacting the number of sanctionable outcomes resulting from enforcement investigations	GLAA-led convictions Sanctions	Convictions = 6 LMEU = 15 LMEO = 2 Warnings = 31 Enforcement Notices = 17 Cases Referred to CPS = 12	To increase all by 10% New Measure - 80% of cases referred which result in meeting evidential threshold- New Measure- 70% of those case which meet evidential threshold result in positive charging decision-	Convictions = 8 (+15 other) LMEU = 6 LMEO = 0 Warnings = 23 Enforcement Notices = 43 Cases referred to CPS = 5 (1 met positive charging decision, 1 decision not to charge and 3 are under consideration) Cases currently with CPS = 7

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
	To make use of financial investigation powers in investigations	Number of investigations featuring proceeds of crime investigations (POCA)	No = 1 Value = £41,300	To improve on the baseline	Number = 0
5. Develop our people and culture in line with the GLAA's PROUD values, ensuring a diverse, resilient and change-ready organisation	To improve retention levels, increase diversity and increase satisfaction of GLAA employees	Performance effectively managed and meeting with line manager.	81% agree /strongly agree.	To improve on 2018 baseline	No available results
		Proud to work for the GLAA	Baseline 94%	To maintain 2018 baseline	No available results
		Treated with fairness and respect	Baseline 84%	To Improve on 2018 Baseline	
		Average sickness rates	3.42% (public sector 2.9%)	To maintain or improve on 2018 and move under the public sector average	New CIPD/ONS measure from April 2019 is 3.54%. 2019-20 YTD % working days lost = 2.98%
					
		Average people turnover	17.9% (public sector 2019) GLAA 13.3% (2018)	To maintain or improve on 2018 and remain under the public sector average	21.6%
					

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
		To move closer to the national public sector workforce figures based on gender and ethnicity	Gender female 38% Public sector average 46%	To improve on 2018 baseline and get closer to public sector averages	Gender female 37% Public sector average 46%
			Ethnicity (BAME) 5.8% public sector Average 9.9%		Ethnicity (BAME) 5.8% (47.5% of employees prefer not to say) public sector average 9.9%
		Number of personnel that have a personal development discussion with manager	Wasn't measured in 2018	New Measure 95% of personnel to have discussion	In Q3 - 54% of mid-year PADR reviews have been submitted to HR.
6. Provide efficient and effective services, sound governance, robust risk management and value for money	To deliver a balanced budget, deliver on savings targets	Performance against budget	Add percentage variance as at end of March 2019	To improve on baselines	Underspend approximately (70,000 as at 29/02/2020*)
			Savings target 300K	Current projected overspend is £300k to monitor savings plan to bring underspend to zero	
		End of year overall audit opinion	Anticipated to be limited	Moderate	17 actions remain open, with 10 closed in Q4
	To improve on Internal Audit view of GLAA	Responses to audit recommendations within agreed timeframes	Percentage of high and medium actions completed by due date	80% of actions completed by due date	10 actions overdue as of 31/03/2020

Objective	Aim	Measure	Baseline 18-19 to 31 March	Target 19-20	2019-20 Total
		Internal audit opinion on risk management	Limited	To move audit risk opinion to Moderate	Limited

- (i) Operational constraints meant that Tier 1 resolutions were only carried out for part of the year we have extrapolated them out for a full year.
- (ii) The construction and garment protocols were signed during the course of 2018 following which there was enhanced intelligence from those sectors

Prevention

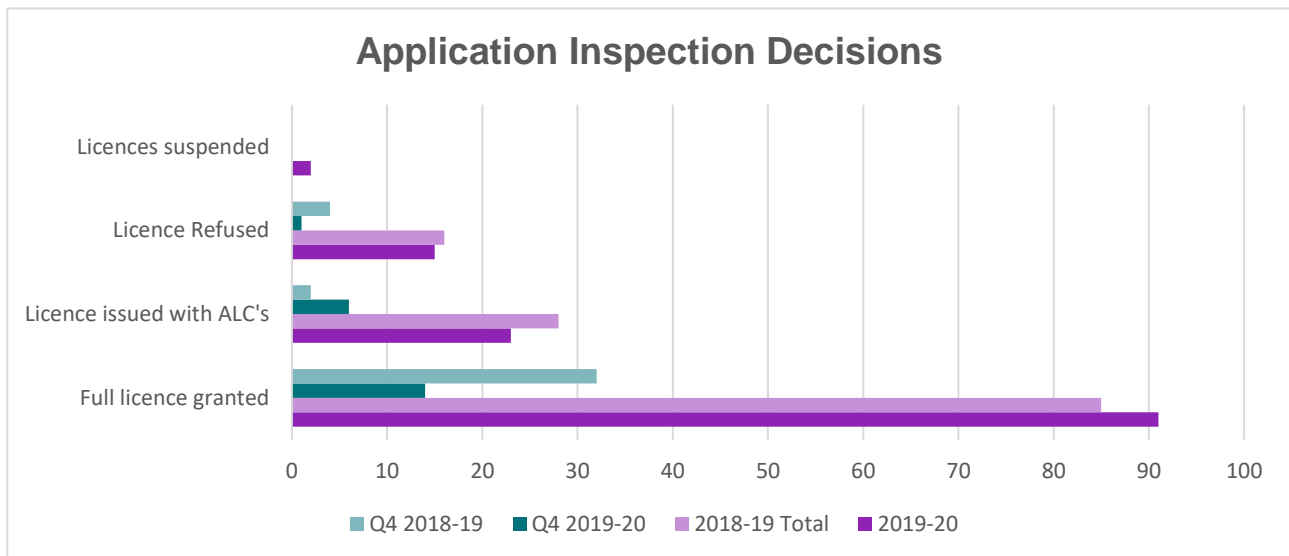
Strategic Priority: Preventing Worker Exploitation

- Maintain a credible licensing scheme
- Creating a level playing field and promoting growth
- Engage with stakeholders to minimise and manage risk
- Manage risk and support compliant business

Licensing

Currently there are 1,037 GLAA licence holders supplying workers to the GLAA regulated sectors.

Licence applications initiated		
April 2018- March 2019	April – December 2019-2020	% change from April 2018 - March 2019
176 Average 15 per month	147 Average 12 per month	16.5% ↓

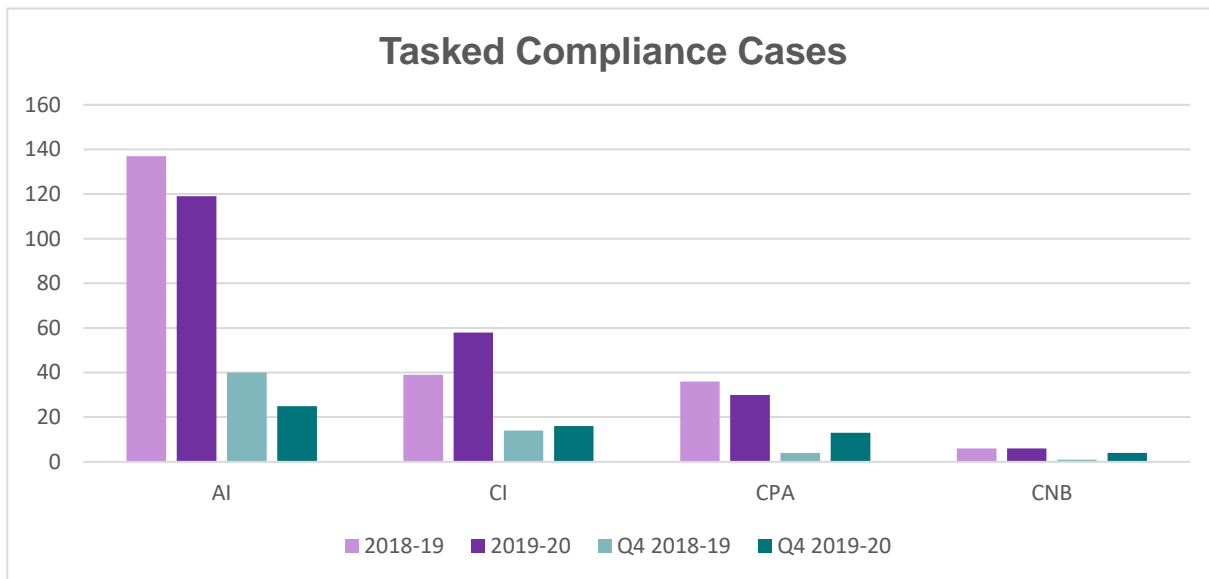


20 licences were revoked during 2018-19, all **without immediate effect**. 2019-20 also saw 20 licences revoked **without immediate effect**, and 3 **with immediate effect**, 2 of which occurred in Q4.

Compliance

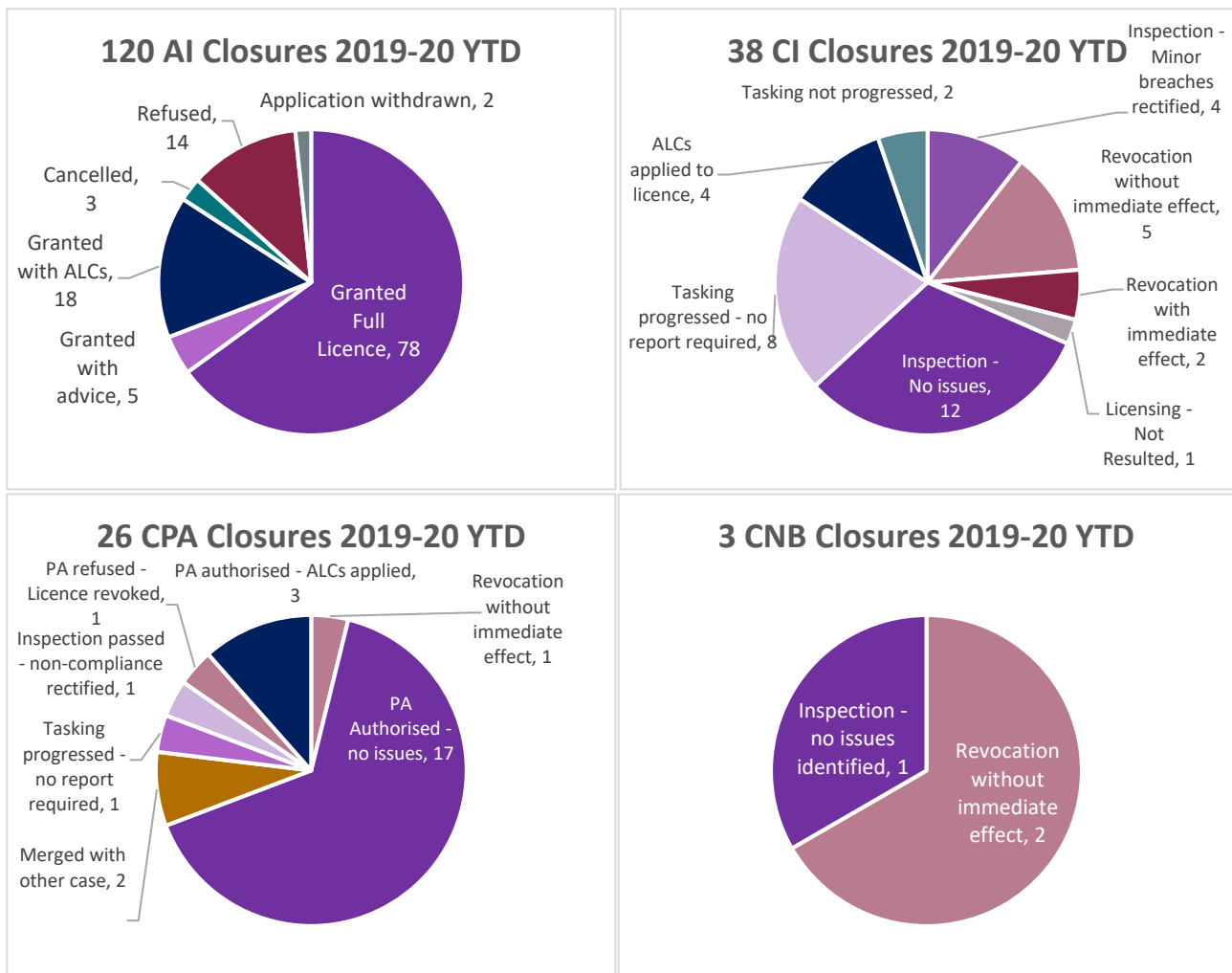
Compliance Cases tasked		
2018-19	2019-20	% change
222	213	4% ↓

Compliance cases tasked this financial year have decreased by 4% when compared to the number tasked in 2018-19. This decrease is concentrated to compliance cases only, as this year to date has seen a slight increase in total tasked enforcement and NSO investigations when compared to 2018-19.



Closed cases by type

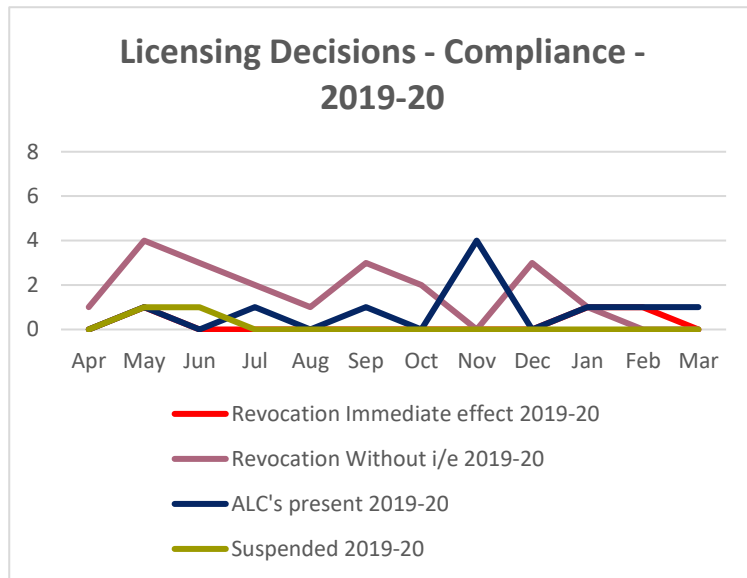
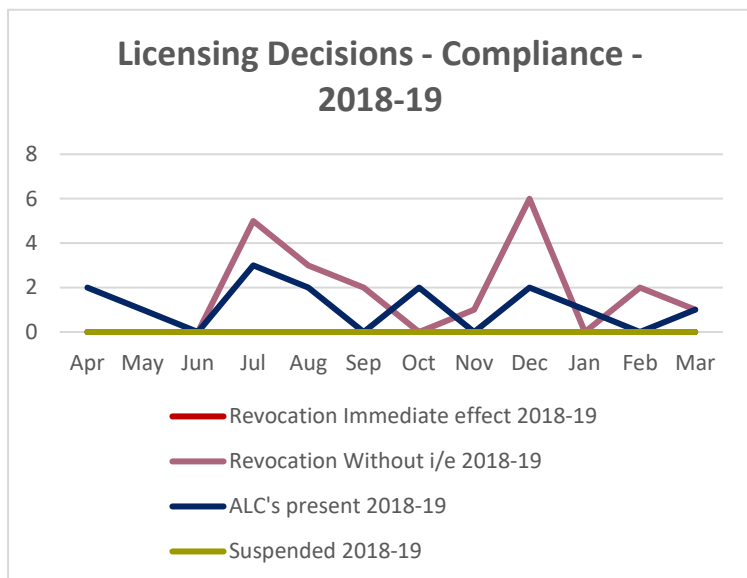
187 compliance cases in total this financial year have been finalised, 114 of which were tasked after April 2019.



The issuing of ALCs allows businesses to either commence or continue trading in a compliant manner without additional sanctions, as explained in the 2018-19 End of Year report¹, however with the understanding that the GLAA monitors the situation and may take necessary action if the condition is not complied with. It is recognised that the relationship between the issuing of ALCs and licence revocations is changeable, and when the number of licensing decisions is stable as it has been this year, an increase in one area will naturally result in a decrease in another.

¹ GLAA 2018-2019 end of year performance report
15

An illustration of decisions in 2018-19 and 2019-20 on existing licences is shown below.



Appeals

2018-19	Appeals Received	Decision
Refusal	4	3 Dismissed, 1 Withdrawn
Revocation	1	1 Withdrawn

2019-20	Appeals Received	Decision
Refusal	1	1 Ongoing
Revocation	8	6 Ongoing, 1 Dismissed, 1 Withdrawn
ALC	1	1 Struck Out
Suspension	1	1 Withdrawn

Two further attempts to appeal were also received this financial year however they were struck-out as the attempts were not made in time.

Communications

GLAA website (filtered view)

	Total users	Total sessions	Total page views
Q1 2019-20	24,506	29,219	104,670
Q2 2019-20*	9,339	10,001	45,420
Q3 2019-20*	47,672	50,212	58,276
Q4 2019-20	122,258	127,479	134,669

*On 11/09/2019, a cookie consent form was introduced on the GLAA website which requires users to opt-in to their record of visiting the website being recorded. As this was an opt-in opposed to opt-out function, this has caused a dramatic fall in available data which is evidenced in the above and below tables in comparison to Q1. A new cookie consent form was introduced on 07/11/2019 and therefore data has started to return to expected levels. Social media stats remained unaffected.

Visits to website broken down by UK City – 2019-20 (Top 10)

City	Users
London	72,233
(Location Not Set)	18,352
Nottingham	5,482
Birmingham	4,043
Leeds	3,054
Manchester	2,510
Liverpool	2,192
Bristol	1,912
Newcastle upon Tyne	1,903
Sheffield	1,662

Social media breadth (March 2020)

	Number of followers
Twitter	4,572 (182 more followers in than Q3)
Facebook	1,313 followers (42 more followers than Q3)
LinkedIn	3,801 followers (361 more followers than Q3)

The 2019-20 Business Plan target is to increase the reach of social media by 5%. The GLAA has greatly exceeded this target, with an average of 174,950 'impressions' each month on Twitter, and reaching an average of 35,494 people per month on LinkedIn, and 188,642 people per week on Facebook. Per the above table, the number of followers has increased on each platform month-on-month this financial year, and this has resulted in the reach of social media being increased by 39%.

Business Change

The GLAA were involved in 29 engagements with partner agencies, charities and stakeholders from various sectors of the labour market this quarter².

	No of Engagements (Business Change)	No of Engagements (Syndicate staff)	Reach (approx.)
April - 19	9	12	513 (excluding potentially thousands of radio listeners)
May - 19	7	5	528 (excluding potentially 6.79 million radio listeners)
June - 19	18	6	896
July - 19	12	13	635
August - 19	2	8	292
September - 19	11	14	1,257
October – 19	8	15	1,700
November – 19	4	21	875
December - 19	1	14	177
January – 20	14		259
February – 20	8		240
March - 20	7		158
TOTAL	209		7,530

² Data is derived from multiple platforms and it is possible that a large number of engagement activities are unreported, particularly those that feature during normal investigative duties. This data should not be relied on as an exact figure, rather should be used as a guide only.

In Q4, the reporting process changed and has merged both strategic and operational engagements together, hence why Q4 data does not differentiate. This is due to potential cross-overs of activity between teams and to avoid duplication.

Freedom of Information (FOI) requests

In 2019-20 the GLAA received 53 requests under the FOI Act (38 requests in 2018-19). These mainly concerned investigations and operations in relation to licensing and labour exploitation, together with the strategic, business and staffing functions of the GLAA. Three FOIs were withdrawn. 45 responses were provided inside the stipulated 20 day period (90%). Two responses were given within 30 days and three outside of 30 days. The three requests that exceeded 30 days required further clarification due to their complexity, together with consultation required for those caught in scope of the request. All the published FOIs within this time period can be found on the GLAA website

18 Parliamentary Questions (PQs) which referenced the GLAA or required a GLAA response were recorded and published on our website. 12 related to GLAA strategy and operations involving modern slavery and labour exploitation. Three were in reference to the seasonal workers pilot scheme, with three relating to the business and staffing functions of the GLAA. All the published PQs within this time period can be found on the GLAA website.

In 2019-20 the GLAA received 6 complaints. Two concerned press releases following licence revocations. One complaint regarding the handling of a licensing application and a complaint following late payment for interpretation services. Two complaints were not progressed. There were 12 complaints in 2018-19.

Protect

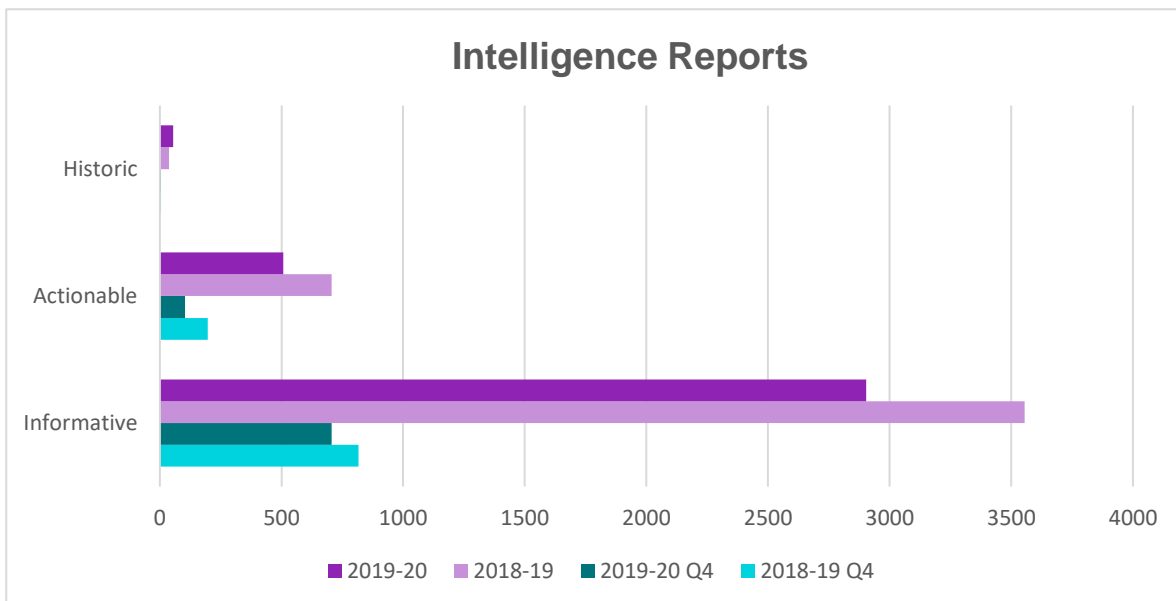
Strategic Priority: Protecting Vulnerable People

- Identify & support victims of labour exploitation
- Work in partnership to protect workers' rights
- Prevent labour exploitation

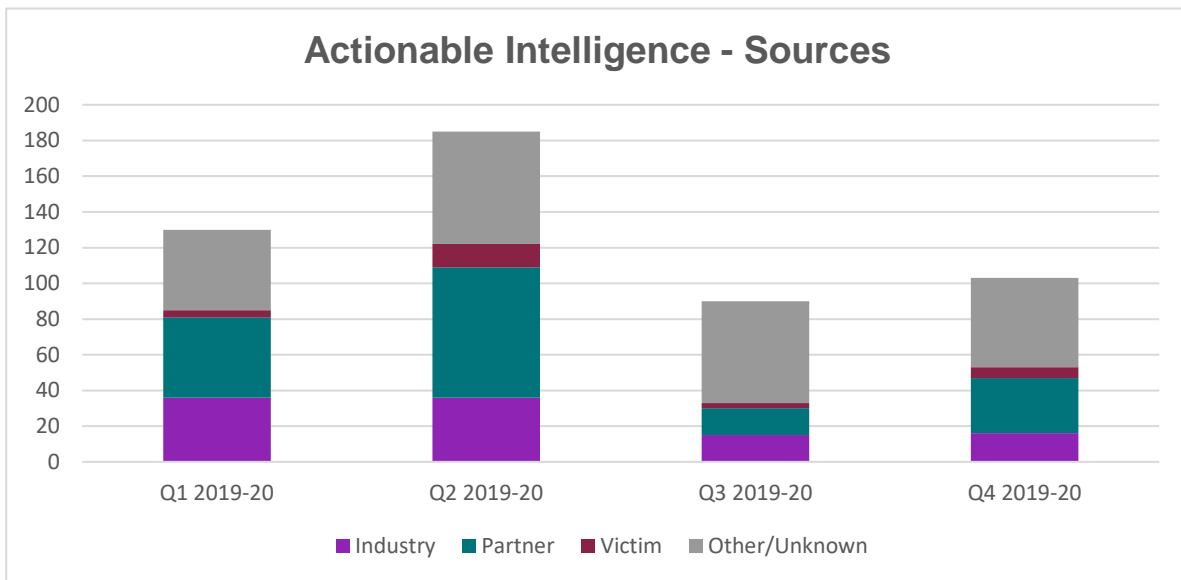
Intelligence

The GLAA is an intelligence-led organisation that receives intelligence from a variety of different sources such as partner agencies, industry, and members of the public. This intelligence also arrives in several different formats, most frequently by email followed by telephone.

	Q4 2018-19		Q4 2019-20		Full year 2019-20	
Intelligence Reports created	1,019		814		3,465	
GLAA Sector?	Yes	No	Yes	No	Yes	No
	338	681	321	493	1,216	2,249
Modern Slavery Indicators	Yes	No	Yes	No	Yes	No
	80	939	65	749	220	3,245



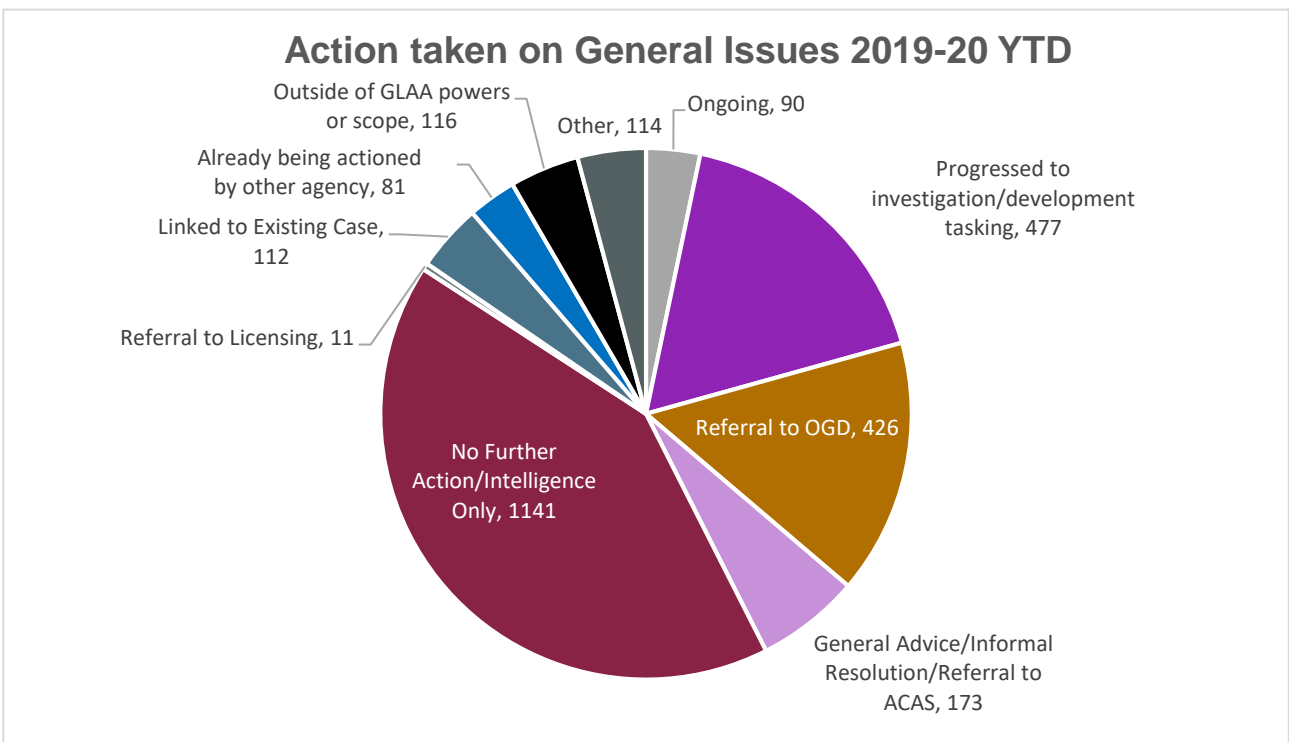
Actionable Intelligence - Sources



General Issues (referrals)

Despite the GLAA recording 1 more referral this financial year compared to last, there has been a slight reduction in the recording of referrals in both Q3 and Q4 compared to the quarterly average over the previous 18 months due to a number of different internal variables.

Action taken on General Issues 2019-20 YTD



	2018-19 Total	2019-20	Change
Created	2,740	2,741	1 ↑

Further fields were added to the General Issue (referral) form on iBase in July 2019 including closing status options such as ‘already being actioned by other agency’ and ‘outside of GLAA powers or scope’, making comparisons to both the previous financial year and Q1 less practicable.

Identification and support of victims

	2018-19 Total	2019-20 Total	% change from 2018-19
Potential victims of labour exploitation/licensing breaches identified	7,550	15,186	101% ↑
Number of NRM Referrals made by the GLAA	33 (plus 13 assists)	7 (plus 23 assists)	35% ↓
Number of MS1 forms submitted by the GLAA	34 (plus 19 assists)	55 (plus 20 assists)	75% ↑

The GLAA’s 2019-20 Business Plan target is to increase the identification of potential victims of modern slavery and labour exploitation by 10%, which has been greatly exceeded this financial year. The most common nationality of potential victims encountered in Q4 were Romanian, and Romanian workers featured in 28 out of 60 cases where potential victims were identified this quarter. The sectors in which victims were most commonly identified in Q4 was in the food processing sector, which was also the case at the mid-year point at the end of Q2 and also at the end of Q4. The second most common sector where potential victims were identified in Q3 was the car washing sector, followed by agriculture.

Tier 1 intervention

The 2019-20 Business Plan target is to increase the amount of withheld wages and Holiday pay recovered for workers within GLAA-regulated sectors in 2018-19 by 25%. This is achieved through Tier 1 intervention. The majority of tier-1 resolutions are made by the office-based intelligence team, and mainly relate to isolated issues relating to a single worker.

Tier 1 Resolutions	
2018-19 Total	2019-20
72 resolutions	39 resolutions (26 intelligence team, 13 enforcement/compliance teams)
53 workers affected	2,374 workers affected
Withheld wages = £2,134	Withheld wages = £2,298.49
Holiday pay = £13,823	Holiday pay = £92,329.51
A further £3,286.23 – does not differentiate between.	Both = £46,492.03
	A further £25,485.27 relates to other recoveries, such as refunded PPE payments, and non-regulated sector recoveries such as unpaid overtime.

Despite the GLAA 2019-20 business plan target seeking to increase recoveries made within GLAA-regulated sectors only, enforcement officers have also made recoveries outside of sector where clear pay irregularities, such as unpaid overtime, have been identified and resolved this year. Resolutions which occur for workers working outside of GLAA-regulated sectors, but with GLAA-licensed agencies, are included in these figures. Overall, in 2018-19 £94,769.49 was recovered, and £166,605.30 was recovered in 2019-20.

Pursue

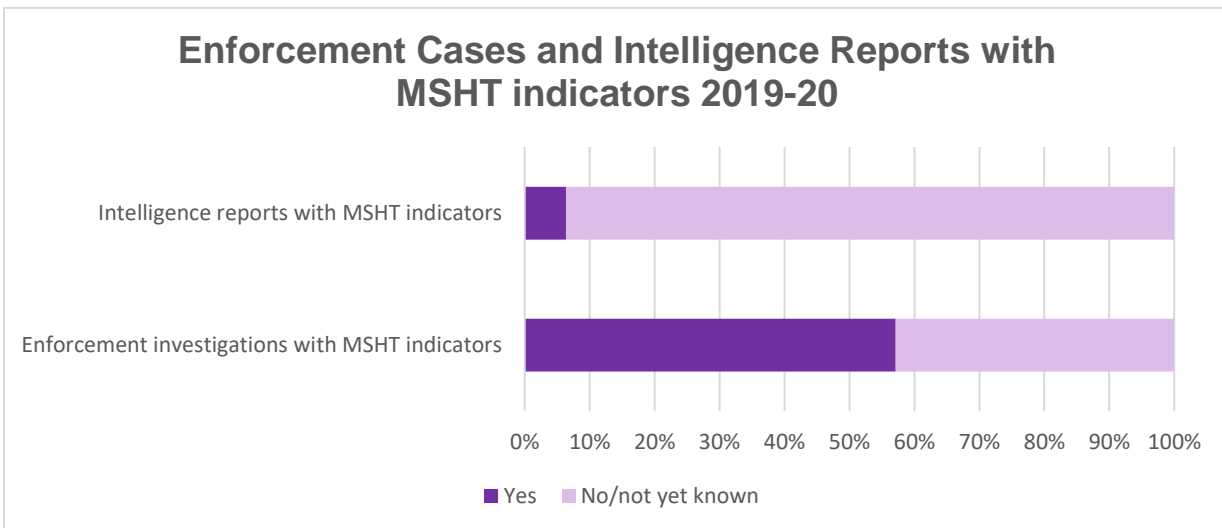
Strategic Priority: Pursuing those who exploit others for their work either financially, physically and or through coercion and control

- Disrupt criminal activity within the labour market

Enforcement operations

	2018-19	2019-20	% change from 2018-19
Enforcement cases tasked	247	268	8.5% ↑
Non-standard operations (NSO)	57	82	43.9% ↑

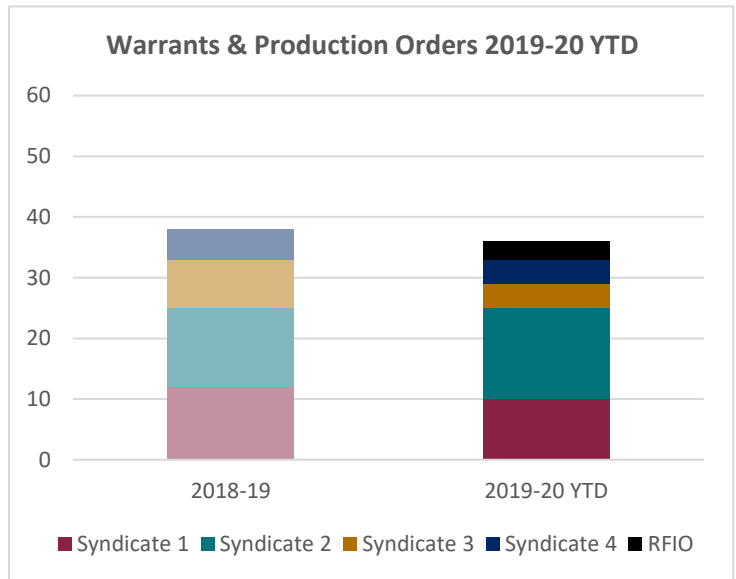
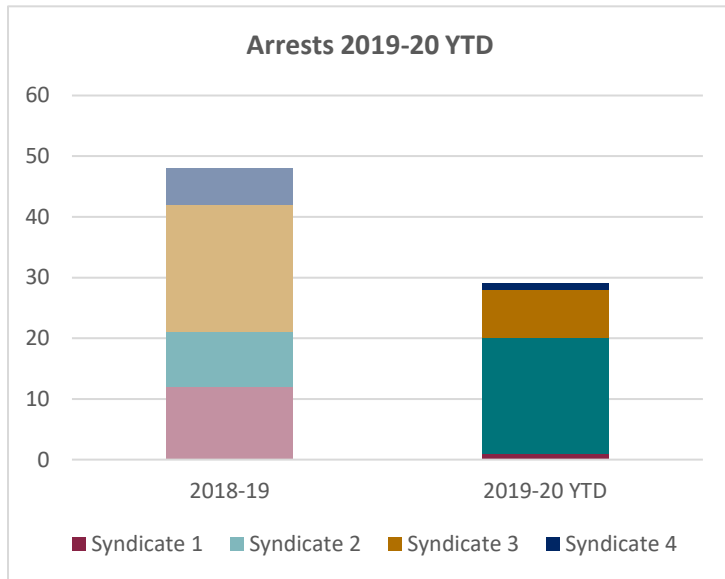
Following on from a large increase in enforcement cases in 2018-19 compared to the previous year, the total amount of cases of this nature has levelled out somewhat, with just an 8.5% increase when compared to 2018-19. There is a substantial increase in the tasking of NSOs this year to date, which commonly feature days of action led by the Police into businesses operating in the car washing sector, and occasionally nail bars and other premises such as restaurants.



It is interesting to note that 95% (1,783) of intelligence reports had no indicators of modern slavery or human trafficking at the time of receipt, which could indicate that these factors may not have become apparent or be identified until further development or corroboration takes place. It is also possible that the indicators may not become apparent until an investigation commences. It is important to recognise that the GLAA receives large quantities of intelligence from partner agencies which do not relate to labour market offences, and instead consists of informative reports with no clear issues relating to modern slavery. This financial year, the most common sector for enforcement

investigations was food processing/packaging, followed by agriculture, followed closely by car washing.

Arrests and Warrants



The 2018-19 End of Year performance report identified 48 arrests made either by the GLAA, or by partner agencies supported by the GLAA. This year, there have been 29 arrests, 5 of which were in Q4. 13 of the 29 arrests this financial year were ‘assists’, meaning that the actual arrest was executed by a partner agency, such as Police, supported by the GLAA. It is commonplace that suspects may wish to be voluntarily interviewed under caution, negating the need for an arrest. This occurred with a further 18 persons in 2018-19, and also 18 in 2019-20.

2019-20 Enforcement case closures					
	Syndicate 1	Syndicate 2	Syndicate 3	Syndicate 4	Total
Convictions	0	2	0	6 (plus 12 'other')	8
Warnings	4	3	7	2	16
Enforcement Notices	9	6	19	2	36
LMEU	3	0	3	0	6
LMEO	0	0	0	0	0

Glossary of Terms

GLAA	Gangmasters and Labour Abuse Authority
AI	Application Inspection
ALC	Additional Licensing Conditions
CARD	Crimson Allocation Record Sheet
CI	Compliance Inspection
CNB	Compliance- New Business Inspection
CPA	Change of PA Inspection
Crimson	Case Management System
ENF	Enforcement Tasking
ENRS	Enforcement Tasking – Non-Regulated Sector
ERS	Enforcement Tasking – Regulated Sector
General Issue	Record of referrals to the GLAA
iBase	The GLAA Intelligence Database
LAWS	The GLAA Licensing Database
MS1	Duty to Notify the Home Office when a potential victim of modern slavery is identified & does not consent to the NRM
MSHT	Modern Slavery/Human Trafficking
NFA	No Further Action
NRM	National Referral Mechanism
NSO	Non-Standard Operation
NTT	Non-Triaged Tasking
OCDA	Office for Communications Data Authorisations
OCG	Organised Crime Group
POCA	Proceeds of Crime Act
RIPA	Regulation of Investigatory Powers Act 2000
SIO	Senior Investigating Officer
SPoC	Single Point of Contact
Syndicate 1	North-East
Syndicate 2	South-East
Syndicate 3	South-West
Syndicate 4	North-West
Tier 1	Monetary or Non-Monetary Resolution for Worker
YTD	Year to Date

