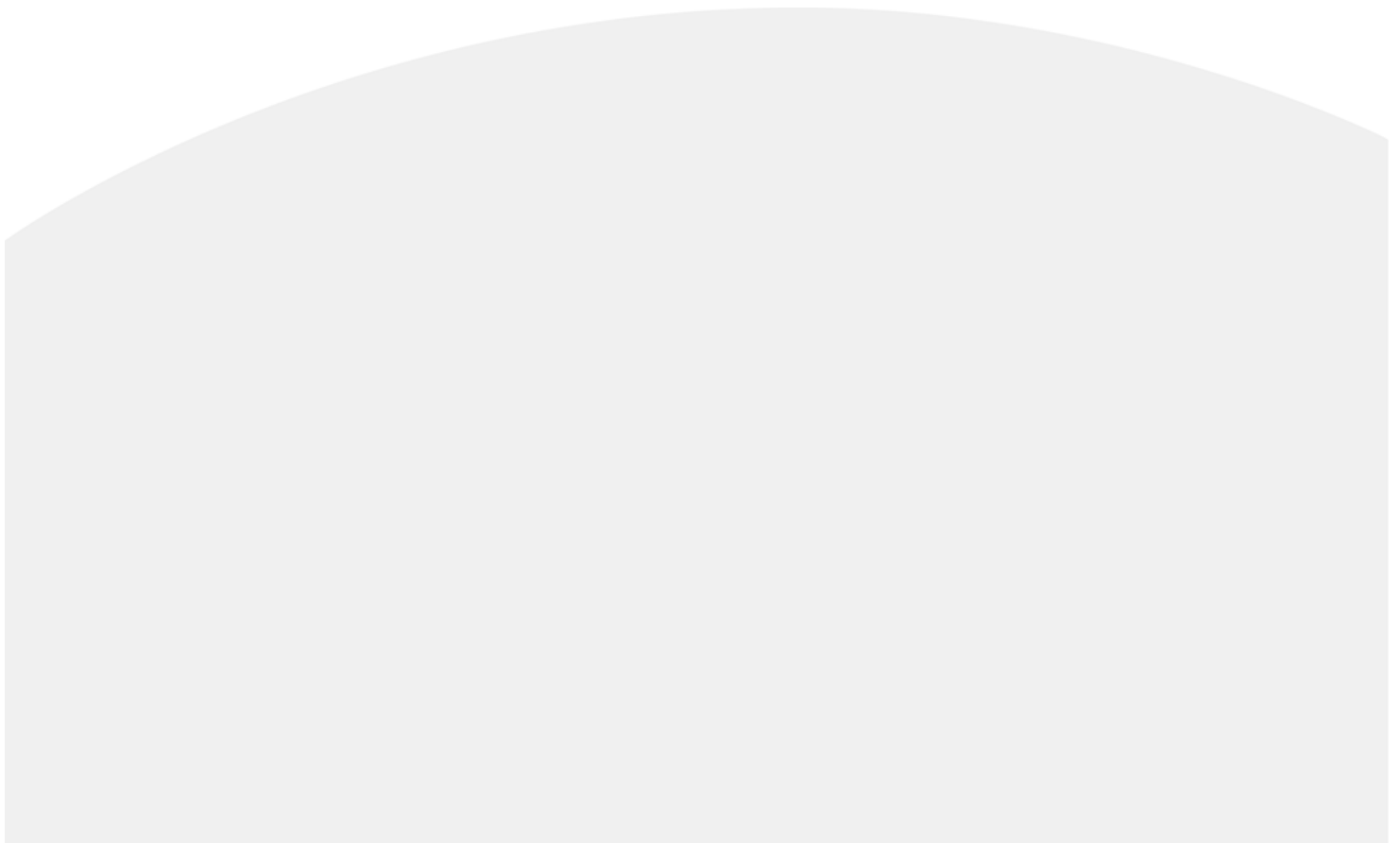




External Communications Strategy for 2009-10

April 2009



1. Introduction

1.1. The Gangmasters Licensing Authority (GLA) will continue to maintain a high media profile in 2009/10. This has proved an effective regulatory tool so far. Though difficult to measure, if there is an effective media profile it will ensure that it plays a part in prevention and deterrence of exploitation. This is appropriate as the GLA moves further from its initial licensing and compliance activity to one in which it is more aggressive in targeting non-compliant licence holders and unlicensed gangmasters.

1.2. The independent reviews by the Universities of Liverpool and Sheffield show the GLA has made a good start and the latest report comments that communications has a direct impact:

“One of the main reasons that the GLA is able to ‘punch above its weight’ is that it has made effective use of publicity and communications. We did not find anyone who was critical of the strategy; although we also note that few agency workers have actually heard of the GLA. Furthermore, many labour providers and users (as noted in the 2007 Annual Review) live in a state of permanent anxiety, and sometimes fear, as to what would happen to them if the GLA were to find anything illegal. This fear / anxiety is not principally about the threat of government regulation / criminal action, but about the possible loss of supermarket contracts. In other words, publicity and communications enables the GLA to ‘punch above its weight’ but the impact is exaggerated by labour users’ and labour providers’ anticipation of the main supermarket buyers’ and ethical auditing/trading teams’ response to such negative publicity.”

1.3. This shows the GLA’s approach to communications is an effective tool in securing compliance with business. However, more can be done to raise awareness with workers in the GLA sectors.

1.4. This strategy explains the GLA’s approach for communicating how the Authority protects vulnerable workers and its effectiveness as an enforcement body in tackling non-compliant businesses.

2. Strategic Priorities

2.1. The GLA’s remit is clear – to tackle the abuse of worker and level the playing field for legitimate businesses struggling to compete against rogues undercutting them. The core purpose underpins the four key strategic aims driving GLA communications during 2009/10:

Demonstrating the GLA’s impact on the problem

2.2. The GLA will be judged by its success in fulfilling its remit. Therefore, it is vital for the Authority to communicate its impact as an effective enforcement body through its intelligence-led operations.

- 2.3. This approach will fulfil part of recommendation 12 in the Liverpool / Sheffield report: “the GLA should continue covert operations and high-profile media campaigns to ensure the visible threat of detection remains strong”.
- 2.4. Furthermore, recommendation 14 in the Liverpool / Sheffield report advocated that “the GLA should make more of its excellent (97%) success rate at appeal in order to try and reduce and deter those gangmasters who might wish to appeal against a revocation”.

Demonstrating the GLA’s value for money

- 2.5. The recession means there is likely to be a drop in tax revenue and increased pressure on public spending. It makes sense for the GLA to show how its work benefits UK PLC.

Increase knowledge of employment rights and encourage more vulnerable workers to come forward for help

- 2.6. Recommendation 13 in the 2008 Liverpool / Sheffield report called for more awareness raising amongst agency workers – a point the GLA acknowledges. More can be done, not just by the Authority but across Government. Activity in this area is also in line with the findings of the TUC Commission on Vulnerable Employment (CoVE) report which advocated that “immediate action needs to be taken to improve employment rights awareness”.¹

Provide clear guidance and advice to labour providers and labour users

- 2.7. This is one of the principles of the Hampton report. Effective advice and guidance can reduce the administrative burden on business as well as the risk of non-compliance. Therefore, it is vital the GLA provides clear and concise advice and guidance in the most appropriate formats.

3. Target Audience

- 3.1. A detailed stakeholder analysis is available in the series of Liverpool / Sheffield reports available on the GLA website.² Generally speaking the following groups will be targeted:

Workers

- 3.2. The overall objective and message is to raise awareness of employment rights and what to do to get help.

¹ See: www.vulnerableworkers.org.uk

² See: www.gla.gov.uk/index.asp?id=1013265

- 3.3. The responses to the labour provider survey conducted as part of the 2008 Liverpool and Sheffield research show three quarters of the workforce in the GLA sectors are foreign-born. While there are some indications that there may be a decline in foreign nationals in the labour force, the use of migrant workers will continue to be prevalent. Therefore, the GLA will continue to provide information in multiple languages.

Labour Providers

- 3.4. Applicants and GLA licence holders need to know what they must do to obtain and remain compliant with the Authority's Licensing Standards. Unlicensed gangmasters must continue to be made aware of the penalties for trading illegally.
- 3.5. The majority of labour providers are UK based. However, a number are overseas. GLA communications should be adapted to take account of their differing geographical locations. One area where this can be enhanced is providing multi-language versions of the prosecution policy.

Labour Users

- 3.6. Labour users must continue to be made aware of the penalties for using an unlicensed gangmaster (including where the labour provider is based outside the UK).
- 3.7. Labour users should also be aware of any other obligations when using labour providers.

4. Interdependencies

- 4.1. Activity to raise awareness with workers will form part of the Government's integrated strategy to improve awareness of basic employment rights amongst vulnerable workers which will start during the second half of 2009/10 and run during 2010/11. The wider campaign is being developed by BERR. A proportion of the budget for this campaign will be allocated to spend on promotional activity in GLA sectors – the GLA will work with BERR officials on the look and tone of the campaign to make sure it is consistent with the GLA worker advertising campaign.

5. Activities

Demonstrating the GLA's Impact on the Problem

- 5.1. A bold and sustained approach will be used to generate a high profile for the GLA's effectiveness. This will include:
- Involving media in GLA operations and generally engaging proactively with the media to showcase the work of the Authority (for example through highlighting how the GLA secures pay arrears for workers), and
 - Continuing to "name and shame" rogue labour providers and complicit labour users. This campaign will be primarily conducted through press stories (this is

likely to drive up compliance through the fear of brand and reputation being ruined).

- 5.2. The GLA will explore how appeal results could be made more freely available (for example by publishing them online).

Demonstrating the GLA's Value for Money

- 5.3. Similar to the activities related to demonstrating the GLA's impact on tackling the problem, the GLA will seek to promote how it has increased tax revenue and reduced exchequer fraud through the use of appropriate news stories.

Increase knowledge of employment rights and encourage more vulnerable workers to come forward for help

Worker Rights Leaflet and Contact Card

- 5.4. The GLA Worker Rights leaflets are available in 15 languages. A smaller contact card has been printed in 5 languages. The leaflet was first produced in 2005/06 and has been extremely popular (over 50,000 leaflets have been distributed). Minor amendments have been made to the leaflet to take account of changes in the law. The content and style of the leaflets will be reviewed. The revised leaflet will then be produced in a variety of languages according to demand.
- 5.5. The leaflet and contact card will be distributed for free in a variety of ways, including:
- By GLA officers during inspections,
 - Making them available for groups who work have contact with workers (including trade unions, community groups and consular services in foreign embassies in the UK),
 - Downloadable from the GLA website.

Worker Adverts

- 5.6. Throughout 2008/09, the GLA published a series of hard-hitting adverts in the foreign language press in the UK designed to encourage abused workers to come forward. These will be rerun during Summer 2009 in order to target migrant field workers. Later in the year, a GLA-specific element to the Government's wider vulnerable workers campaign will be launched.

Provide clear guidance and advice to labour providers and labour users

Published Guidance

- 5.7. The advice and guidance available on the GLA website will be reviewed to make sure it is easy to access and understand. Where possible, information will be consolidated

to avoid repetition. Translating relevant information for labour providers based outside the UK will also be considered.

- 5.8. The GLA will also work with industry to produce appropriate best practice guidelines in order to raise compliance levels (for example, the minimum charge rates guidance).

Labour Provider and Labour User Adverts

- 5.9. Adverts reminding labour providers and labour users of the legal requirements associated with the licensing scheme will also be used where appropriate to support operational activity.

6. Resources

- 6.1. The communications budget for 2009/10 is £82,000. A large proportion of this will be spent on translating and printing publications and placing adverts. The GLA should also benefit from the Government's wider vulnerable workers campaign to raise awareness of employment rights (this campaign has a total budget of approximately £2.5m for 2009/10).

7. Measuring Success

- 7.1. Each separate activity will be evaluated individually. Regular feedback will be sought from stakeholders. The overall strategy will be reviewed annually.
- 7.2. A key element of this evaluation will be assessing whether any campaign results in more calls to the GLA.