

# **GLA Enforcement in the food supply chain: A protocol with major retailers and their suppliers.**

**September 2009**

## Introduction

1. This protocol establishes a common understanding of how the GLA will work with retailers and their suppliers to ensure all parties participate in ensuring the proper application of the GLA licensing standards in the food supply chain. It provides a framework for the relationship and details what the outcomes of will be.
2. This document is intended to be a living and working process containing an actionable series of steps to reduce worker exploitation. It should be read in conjunction with the *Best Practice Guide for Labour Users* (Annex 1).
3. The term supplier in this document includes entities which supply the retailers. Where the context requires it also means labour user. While most signatories to this agreement are in food retailing, it applies equally in flowers and other produce covered by the GLA.
4. The GLA is required by law to carry out its functions and nothing in this agreement precludes any such action by the GLA.

## Terms of the Protocol

### Sharing Information

5. Retailers and their suppliers have access to information that may be of assistance in identifying breaches of the GLA's licensing standards. The GLA would welcome access to this and in return will provide information on the outcomes of operations and where possible will work with retailers and their suppliers on identifying and preventing exploitation.
6. There should be a designated single point of contact (SPOC) within the GLA and each retailer and supplier for the exchange of information. It is expected that the individual who takes on this role will have sufficient seniority to be responsible for the exchange of information and an understanding of how sensitive information should be handled. In the GLA, this will be the responsibility of the Intelligence team using the [intelligence@gla.qsi.gov.uk](mailto:intelligence@gla.qsi.gov.uk) email address or **0845 602 5020**. To avoid delays when the SPOC is not able to read emails, it would be helpful to have a generic email address for information to be sent to which can be accessed by other designated contacts.
7. Whenever practicable the GLA will share the findings of its enforcement action within the supply chain. All parties in receipt of confidential information shared this way will maintain it as strictly confidential.

**It is agreed that the retailers and suppliers will provide information to the GLA where it is believed serious breaches of the Licensing Standards may have occurred.**

8. Retailers and their suppliers will request their respective suppliers to notify the GLA of significant issues which they identify. These issues should be notified to the GLA immediately by email, as they may indicate that enforcement action is urgently required to protect vulnerable workers from exploitation or abuse.

**Comment [x1]:** Some labour users would like to remove this word. Others would like to keep it.

**It is agreed that retailers and their suppliers will encourage their respective suppliers to make available to the GLA any information which may indicate that serious breaches of the Licensing Standards have occurred.**

9. Retailers recognise that they are able to sign up for the active check. The active check alerts subscribers to:
  - 9.1. Revocation with immediate effect;
  - 9.2. Revocation without immediate effect when the decision date is met or any appeal is determined;
  - 9.3. A labour provider has two entries on the register as this will potentially identify cases where a licence is being revoked; and
10. Liaison between suppliers and retailers on non compliance issues is encouraged and where suppliers identify issues with labour provision that can be rectified, they are encouraged to take action accordingly and to accurately record issues identified and corrective action taken.

**It is agreed that the GLA will provide appropriate advice to retailers in such cases.**

#### **Working Together**

11. The GLA will work alongside retailers and suppliers. The GLA would like to meet regularly with retailers and suppliers so that inspection findings can be disseminated to inform best practice
12. The GLA will actively work with retailers and their suppliers to produce and continually review best practice guidance to help prevent exploitation within supply chains.
13. The GLA will work with retailers' and suppliers' ethical auditors in order to encourage a consistent approach to those audits in the identification and prevention of Licensing Standards non-compliances.

#### **Communications**

14. Retailers and their suppliers will request their respective suppliers to register for the GLA's active check service and to ensure they have appropriate arrangements in place to receive alerts.
15. The GLA will maintain a list of those who have signed up for the active check.
16. Suppliers who use other businesses as part of their overall supply to customers are encouraged to make themselves aware of labour supply within those businesses and to ensure that all use of such labour is licensed, e.g. by using the active check. Issues

where suspected breaches of licensing standards within lower tier suppliers is identified should be immediately reported to the GLA by whoever discovers it.

17. The GLA will publish twice a year details of enforcement operations or when appropriate a newsletter outlining a particular issue or concern will be forwarded to all stakeholders .
18. Where appropriate, retailers will invite the GLA to attend their supplier conferences to provide information on inspection findings and steps suppliers can take to eradicate worker abuse.
19. The GLA will send copies of their regular briefings to the retailers' and suppliers' SPOCs for dissemination to auditors as this provides information on licensing issues and legislative changes.

**It is agreed that the GLA, retailers and suppliers, individually and collectively, will communicate regularly.**

#### **Action Following GLA Investigation**

20. The GLA encourages all retailers and their suppliers to take decisive action following any operation which identifies serious worker abuse within their supply chain. The GLA will always respond promptly to request for advice.
21. Where a GLA operation identifies abuse of workers in a retailer's supply chain, the GLA will inform all relevant parties of the findings. Ideally this should be in the form of a full debrief to take place at the supplier's site, and should be attended by all parties including a senior member of the GLA Management Team.
22. Those retailers and suppliers involved are requested to inform the GLA of what steps are to be taken in order to correct or eradicate the identified worker exploitation.

**Retailers and their suppliers will take the necessary steps to ensure that exploitation of workers identified by a GLA operation is eliminated.**

## Publicity

23. Retailers together where possible with suppliers, will provide the GLA with contact details for their media team and a named point of contact. Retailers can contact the GLA press office on 0115 900 8962 or 07825 797130 or by using the [communications@gla.qsi.gov.uk](mailto:communications@gla.qsi.gov.uk) email.
24. Where appropriate, the GLA will acknowledge collaborative work with suppliers and retailers in its press releases and media engagement.
25. The GLA will work with the retailers' and suppliers' media teams on issuing joint press releases. If no agreement can be reached over a joint press release the GLA reserves the right to issue a release following revocation of a licence. If this is to contain reference to any retailers or suppliers, the GLA agree to notify those prior to the information being passed to the press.
26. The GLA will advise the retailers' or suppliers' SPOC of any approach made for interview or comment.

## Protocol Review

The purpose of the review is to ensure that the Protocol is a living, working process and is an actionable series of steps which reduce worker exploitation.

**Retailers and supplier representatives and the GLA will meet at least every six months to improve practice, discuss progress and issues and exchange views and information.**

**Retailers and supplier representatives, and the GLA will review the Protocol annually.**

### **What We Have Agreed**

**Retailers and their suppliers will provide information to the GLA where it is believed serious breaches of the Licensing Standards may have occurred.**

**Retailers and their suppliers will request their respective suppliers make available to the GLA any information which may indicate that breaches of the Licensing Standards have occurred.**

**The GLA will provide appropriate advice to retailers and suppliers in such circumstances.**

**The GLA, retailers and suppliers, individually and collectively, will communicate regularly.**

**Retailers and their suppliers will take the necessary steps to ensure that exploitation of workers identified by a GLA operation is eliminated.**

**Retailer and supplier representatives and the GLA will meet at least every six months to discuss progress, issues and exchange views and information.**

**Retailer and supplier representatives and the GLA will review the Protocol annually.**

**Annex 1****Best Practice Guide for Labour Users**

The Gangmasters Licensing Authority was set up to curb the exploitation of workers in the agriculture, horticulture, shellfish gathering and associated processing and packaging industries. There are now over 1200 gangmasters licensed by the GLA, which means that these businesses meet the GLA licensing standards and the principal authority of the business must meet 'Fit or Proper' person criteria. Despite the introduction of the GLA licensing system, it is clear that issues still exist within the supply chain and it is not enough for labour users to rely on their labour provider having a GLA licence to ensure that workers are being treated fairly and within the law.

This guide has been put together at the request of suppliers who have asked for clear guidance on what a responsible labour user looks like; namely if a breach of Licensing Standards is found within the supply chain how can a labour user show that they have taken all **reasonable** steps appropriate to mitigate the risk of this happening.

The guide has been split in to two clear sections – 1) GLA Requirements, Licensing and labour provider auditing 2) Best practice guidance to employing agency workers. Within that, each point has been prioritised as Legal Requirement, High, Medium and Low Priority.

The guide is designed to be a catch-all for best practice surrounding the use of agency labour. Not all best practice needs to be adopted and businesses are recommended to consider which practices to adopt in line of their own circumstances and when. There will be resource implications of adopting all recommendations but the aim of the document is to help labour users minimise risk in this complex area.

The Guide is supported by the GLA and major UK Food Retailers, and will be updated as and when laws and best practice change.



**GLA Requirements, Licensing and Labour Provider Auditing**

Priority	Question	Yes/ No	How? Who can help?	Why?
Legal Requirement  HIGH	Is your labour provider licensed?		<p>Go to <a href="http://xrl.in/37ns">http://xrl.in/37ns</a> and check the public register</p> <p>The public register displays entries alphabetically by business name. You can search on the name of the organisation or the trading name. If a business is based in more than one place you will only find the address for the head office. Branch addresses will only be listed if they are separately licensed. Always ask for the licence number as this will make checking easier. The licence number is also known as the Unique Reference Number (URN). You should always check that the person you are doing business with is authorised on the licence. All of those able to do business on behalf of the licence holder are shown the public register entry as authorised persons or post holders. In large organisations you will see only the job title. Generally, a labour provider will have one entry on the public register which contains details of their current status. Occasionally, you may find that a labour provider has two entries: licensed and applied. This occurs when a labour provider has had a licence revoked without immediate effect and so has made a fresh application before the licence is revoked. This will also occur if the status of a business has changed as a new application will be required.</p>	Since 1 October 2006 all labour providers to the agriculture and food industries must be licensed under the Gangmasters (Licensing) Act 2004. It is the responsibility of the labour user to ensure that they are using legal labour providers.
Legal Requirement  High	Have you asked your labour provider for a list of all of the names of workers who work on your site?			You are responsible for all workers on your site.



HIGH	<p>Are you registered on Active Checks which will give you regular updates and notify you of changes in your labour provider's status?</p>	<p>Go to <a href="http://xrl.in/37ns">http://xrl.in/37ns</a> and sign up for regular updates</p> <p>Ensure your contact details registered with the GLA Active Check Service are fully up to date at all times and that someone within your organisation can receive the message in your absence</p>	<p>If you register an interest in a labour provider through the GLA 'Active check' process:</p> <ul style="list-style-type: none"> <li>• The GLA will have a record that you have made a check; and</li> <li>• The GLA will be able to inform you of any change to the status of this labour provider.</li> </ul> <p>By registering your interest with the GLA in one or more labour providers via the active check process, we will let you know if:</p> <ul style="list-style-type: none"> <li>• the labour provider is inspected</li> <li>• the labour provider's licence is revoked</li> <li>• they cease trading</li> <li>• material changes are made to the licence such as a change of licence holder,</li> <li>• individuals named on the licence who are permitted to negotiate on behalf of the licence holder are changed</li> <li>• the labour provider has been granted or refused a licence if they are currently undergoing the application process</li> </ul> <p>If you have any doubts at any time as to whether the labour provider is licensed you should contact the GLA for confirmation on 0845 602 5020.</p>
High	<p>Do you have a clear Service Level Agreement (SLA) with your labour provider that contains-</p> <ul style="list-style-type: none"> <li>o Minimum payment period for workers if they turn up to work and are no longer needed</li> <li>o Detailed charge rates</li> <li>o Payment agreement between labour provider and labour user and confirmation that workers will be paid</li> <li>o Written agreement on responsibility for health and safety training</li> <li>o Notification of any subcontracting</li> </ul>		<p>This will help you have a clear understanding and documentation of exactly who is responsible for all elements of your workers' welfare. It will also enable you to be clear on your expectations of what you expect your labour provider is doing on your behalf when recruiting labour. It is good practice to ensure that workers are not required to attend unless there will be sufficient work for them.</p>

	if you allow it			
High	Do you have a clear arrangement with your labour provider to ensure the health and safety of all workers? Are their language problems and have you made provision to overcome this?		See Annex 2 for suggested checks to make during an audit	Licence holders must collaborate with labour users to ensure that responsibility for the identification and delivery of health and safety training or any induction training necessary to ensure safe working practices has been agreed and assigned. The responsibility for health and safety should rest with the labour user.
High	Do you conduct documented random checks of your agency workers? E.g. Checking wage slips, worker transport. Do you discuss their accommodation with them?		If you need advice on this aspect the GLA will help. Contact them and as soon as an inspector is able they will contact you and advise you accordingly. Bear in mind that the Labour Provider has responsibilities under the Data Protection Acts.	Conducting regular checks will help you ensure that your labour provider is acting legally and responsibly towards their workers.  As well as document checks, formal interviews, informal conversations with agency workers or regular agency workers surgeries are good ways to find out about an agency worker's experience and if there are any issues with the agency. <b>A list of possible questions is included in Annex 2</b> but please be aware that workers are likely to respond better to more informal conversations rather than formal interviews.
High	Have you checked that you are paying your labour provider enough to meet the minimum legal requirements and other associated costs (see box to right). The GLA publish an indicative charge rate on their website. You should pay <i>at least</i> the GLA indicative minimum charge rate		Specific guidance on rates is detailed in a brief entitled " <b>Minimum Charge Rates</b> " agreed between the ALP and GLA which can be found at <a href="http://www.gla.gov.uk/embedded_object.asp?id=1013446">http://www.gla.gov.uk/embedded_object.asp?id=1013446</a>	Labour users should be suspicious of rates that do not allow the labour provider to meet the following elements: <ul style="list-style-type: none"> <li>• <u>Minimum</u> unavoidable total wage costs required to meet basic legal requirements such as the minimum wage, national insurance, SSP and statutory holiday entitlement.</li> <li>• Agricultural minimum wage where appropriate</li> </ul> <a href="http://www.defra.gov.uk/farm/working/agwages">http://www.defra.gov.uk/farm/working/agwages</a> <i>(The Agricultural minimum wage is set by the appropriate Agricultural Wages Board and is contained in the Agricultural Wages Order. There are three different Agricultural Wages Orders covering England and Wales; Scotland; and Northern Ireland.)</i>

			<ul style="list-style-type: none"> <li>Labour provider's business overheads, transport costs, management cost and profit</li> </ul> <p>Labour users should consider whether they are being offered a 'too good to be true' price for the provision of labour. If this is the case the GLA would urge you to report the matter to them and not accept this offer</p>
High	Have you asked your Labour Providers to notify you each and every time they have a visit or inspection from the GLA and tell you about the outcome?	<p>Register for the GLA's active checks, which will inform you when your labour provider has been inspected.</p> <p>A list of weekly inspections is also published on the GLA website. The report shows:</p> <ul style="list-style-type: none"> <li>If the GLA is revoking the gangmaster's licence</li> <li>any additional conditions which may have been added to the licence</li> <li>whether an application for a licence has been refused</li> <li>if no issues were raised at the inspection</li> </ul> <p>The labour user can then get in touch with the labour provider and find out more information.</p> <p>Letters detailing the inspection outcome will have been sent to labour providers.</p>	<p>Not only will this help enhance your relationship with your labour provider, if they are willing to share outcomes with you this will help you understand and deal with any issues raised during the audit in a quick manner.</p>
Medium	<p>Do you conduct a regular inspection of your labour provider to cover -</p> <ul style="list-style-type: none"> <li>Payment of Wages Tax NI VAT and Improper Deductions.</li> <li>Debt Bondage, Harsh Treatment and Intimidation of Workers</li> <li>Workers Accommodation.</li> <li>Hours Worked, Working Time Regulations</li> <li>Breaches in Health &amp; Safety Including Training</li> <li>Transport</li> <li>Recruitment and Contractual Arrangements.</li> </ul>	<p>See Annex 2 for suggested checks to make during an audit.</p> <p>HMRC may well seek to recover input tax from a supplier who has not done due diligence on their Labour Provider.</p>	<p>It is not enough to rely on a GLA licence. As a labour user you must ensure that your labour provider is acting responsibly. Being GLA licensed is an indication that a labour provider at some historical point has had its relevant systems inspected and that these comply with the Licensing Standards. However, a labour user should seek regular verification through interviews, audits and documentary evidence of the issues in Column 1.</p>

	<p>o Sub-Contracting</p>			
<p>Medium</p>	<p>Are the workers on your site who work for labour providers aware of who to report problems to? Encourage them to raise any issues with you or ensure they have contact details for the GLA.</p> <p>Do you have a person workers can go to who can talk to them in their own language?</p>		<p>Provide the worker with contact details for the GLA and / or pass the information on yourself directly to the GLA by calling 0845 602 5020.</p>	<p>From time to time, you may hear of worker complaints ranging from not being paid by the labour provider for hours worked or questionable deductions to the even more serious matters of threats and abuse. You may want to handle this yourself but you should also provide the worker with contact details for the GLA and / or pass the information on yourself directly to the GLA. This will enable the GLA to deal with labour providers who may be breaching the licensing standards. All information is handled in accordance with the National Intelligence Model which means that the GLA will acknowledge receipt of information but may not be able to provide you with any further detail until any investigation is finalised.</p> <p>The GLA accepts some complaints may be misunderstandings and would not usually launch a full investigation without some evidence or other intelligence received in relation to a labour provider. If an investigation is launched then we would be happy to provide positive publicity to any supplier/labour user who has worked with the GLA.</p>

## **Annex 2 – What to check during audit of a labour provider**

The complete Licensing Standards are available on the GLA website: [www.gla.gov.uk](http://www.gla.gov.uk). This section explains how you can make your own checks against the standards when you audit a labour provider.

### **Licensing Standard 1: Fit and Proper & Competency Test**

- Check that your labour provider has a current GLA licence, and register for active check. The active check will keep you updated on any changes in your labour provider's status and inspections of your labour provider. Ensure that your labour provider informs you of the outcomes of any GLA inspection and see if you can assist them in clearing additional conditions added to a licence.
- If you identify non-compliances against the GLA Standards that are correctable, work with your labour provider to clear these and keep accurate records of action you have taken.
- If you become aware of any changes to the labour provider's business that may affect the licence you should ask them to report these to the GLA without delay.
- Ensure that your labour provider is competent in operating his business and that he is aware of the GLA standards and UK law governing his employment of workers. If you have doubts contact the GLA.

### **Licensing Standard 2: Pay and Tax Matters**

- Confirm that the labour provider has a payroll system in place, and that all workers are on the payroll.
- Check that all workers are paid correctly, at least (national or agricultural) minimum wage when compared to the hours worked. Check that workers are issued with payslips at each pay interval. Check that no wages have been withheld for unlawful reasons, that all workers understand and receive any benefits they are entitled to (e.g. holiday pay, statutory sick pay) and that these are duly paid (e.g. holiday pay must not be rolled up).
- Make every effort to ensure that the labour provider has deducted appropriate income tax and NI from workers' pay. If you have them you could use your own payroll staff to help check that pay slips are accurate.
- Check that other allowable deductions are legitimate and optional, and that the workers have voluntarily signed up to these.
- Where the business' turnover has exceeded the VAT level check that it is registered and pays over any VAT due as and when required.

### **Licensing Standard 3: Prevention of Forced Labour and Mistreatment of Workers**

- No worker should be subjected to any physical or mental mistreatment at any time.
- If workers owe money to the labour provider you should establish the reasons for this, check that each worker has agreed to the loan voluntarily and in writing, and that the worker will not have to repay more than the amount loaned.
- No debt should prevent any worker from leaving the employment of the labour provider.
- A check should be made that all workers have freely chosen employment with their labour provider and that they are free to leave the employment after the agreed notice period. Workers should not be kept against their will by fear of any penalty, financial or otherwise.

- There should be no disadvantage to any worker wishing to take up permanent employment other than the normal period allowed (13 weeks). Further guidance can be obtained at <http://www.berr.gov.uk/files/file24248.pdf>
- Check that the labour provider does not retain workers' passports or ID cards beyond initial right to work checks.

#### **Licensing Standard 4: Accommodation**

- If accommodation is provided, or effectively provided, to any workers by the labour provider it must be safe for the occupants, in good repair, contain adequate facilities and not be overcrowded.
- Check separate agreements between workers and labour providers in relation to accommodation and raise anything that may lead to workers being exploited with the labour provider immediately.
- If workers have chosen to use accommodation provided or effectively provided by the labour provider charges should not exceed the accommodation offset amount irrespective of what the charge includes. For further information on the accommodation offset and relevant minimum wage refer to <http://www.berr.gov.uk/files/file47736.pdf>
- If workers live in accommodation provided, or effectively provided, by the labour provider and decide to leave they should be allowed to do so after giving 10 working days notice.
- If accommodation is in a licensable House in Multiple Occupation, in an area subject to selective licensing, or situated on a caravan site which requires licensing, the property must be duly licensed. In Scotland the landlord must be registered with the local authority as a private landlord.

#### **Licensing Standard 5: Working conditions**

- Both you and the labour provide should keep accurate records of workers' hours. Hours worked should not breach working time regulations.
- The labour provider should ensure that you have a list of workers supplied to you for each shift. Working hours recorded should be capable of being linked accurately to pay.
- It must be clear that workers are allowed to take necessary rest breaks during a working day and that they also have time off in accordance with the Working Time Directive, normally one day off in 7 days or two days off in 14.
- Workers who work in excess of 48 hours per week should have freely signed an opt out agreement and should have been advised of what they were signing in a language they can understand. It should also be understood that despite signing this they can opt back in by giving the required notice period.

#### **Licensing Standard 6: Health & Safety**

- There should be a written agreement between you and your labour provider covering
  - responsibility for day-to-day management of health and safety,
  - responsibility for completing risk assessments,
  - responsibility for managing and controlling risk
  - provision of health and safety training and personal protective equipment.

- Ensure that all workers receive necessary health and safety training. If training is to be carried out by the labour provider check whether and to what extent this is being completed. E.g. confirm that workers would know what to do in the event of a major incident. All health and safety information should be comprehensible to workers. Time spent on health and safety training should be treated as an extension of work time, and the worker should not be charged for the training.
- Appropriate personal protective equipment must be provided to workers without charge. Agreements between labour provider and labour users should make clear who will meet the cost of the PPE.
- Welfare facilities should be provided where reasonably practicable or required by law, including sanitary conveniences, washing facilities, drinking water, changing rooms, and areas for rest breaks or the consumption of food and drink.
- Arrangements for first aid and the reporting of incidents at work should be in place.
- You should advise the labour provider of any foreseeable risks to the health and safety of his workers whilst on your site.
- Use of transport provided by labour providers must be optional for workers.
- If transport is provided for workers all vehicles should be roadworthy and without obvious defects. Check that vehicles have a valid tax disk, MOT and insurance.
- Vehicles should not carry more passengers than the number of fitted seats.
- If workers are transported in vehicles with nine or more passenger seats these should be registered as Public Service Vehicles (PSV) and drivers should have Passenger Carrying Vehicle (PCV) licences.
- You should refer any concerns workers raise regarding the safety of any transport to the labour provider immediately.

#### **Licensing Standard 7: Recruiting Workers and Contractual arrangements**

- Workers must not have been charged any fee for their recruitment.
- Recruitment must not have been conditional upon the worker purchasing other services. Workers should be free to refuse or cancel any other services offered by the recruiter at five days notice, without detriment.
- In the case of foreign workers, examine all steps up to the point of commencing work with the labour provider. How, where and through whom did workers learn about the job in the UK? Were they charged before or after arriving in the UK? If so, by whom and for what?
- Every organisation involved in the recruitment process should hold a GLA licence. Check in what country and by whom workers were recruited. Check that every person involved in the process has a GLA licence. If in doubt contact the GLA. If you become aware of any potential unlicensed intermediaries but fail to report it you could face prosecution for using illegally supplied labour.
- Workers on contracts for services or of services must be provided with written terms and conditions before they start work. These should include
  - Whether the contract is of services or of employment
  - That the worker will be paid whether or not the labour provider is paid by the labour user
  - Notice periods
  - Applicable pay rates
  - The intervals at which the earnings will be paid
  - Details of any entitlement to benefits, incl. paid annual leave

- Take up any concerns which you may have or which workers have raised immediately with the labour provider and check that these are addressed.
- Check that the labour provider maintains personnel files which contain the relevant details you would expect to find within your own direct employee files.
- Labour providers must have carried out a due diligence check on each worker's right to work and remain in the UK, e.g. by checking and copying original identity documents.

**Licensing Standards 8: Sub-Contracting and Using Other Labour Providers**

- If you allow labour providers to sub-contract your labour provider has records of other labour providers used.
- Check that all subcontractor labour providers are also licensed by the GLA. You should ensure that you or your labour provider have carried out checks as per Section 1 of this guide.
- Be proactive in looking out for any instances of sub-contracting you are not aware of, particularly at peak times when your demand for labour may increase. This is the time when you need to talk to workers to establish exactly who they are working for, or check employers' details specified on pay slips.



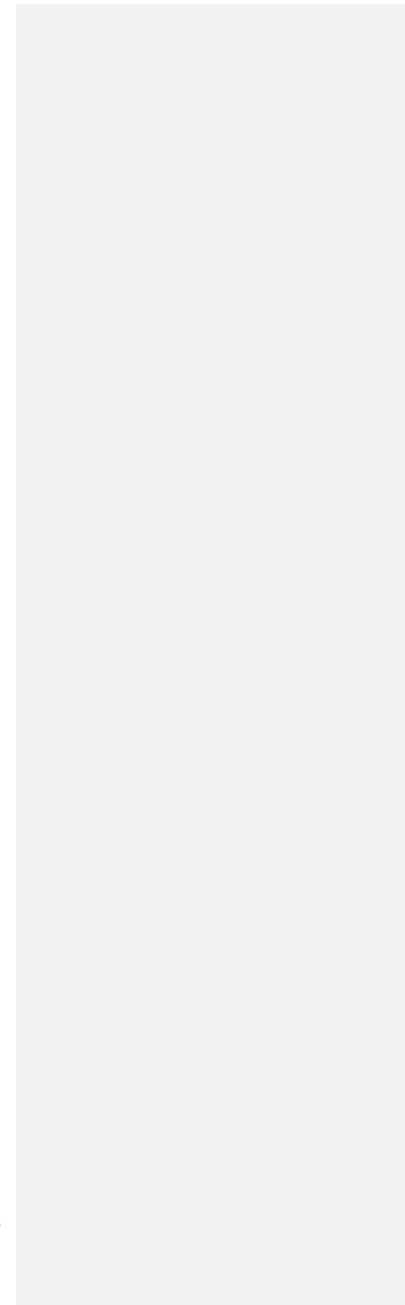
**Annex 3**

**Possible Questions for agency worker interviews**

1. Who do you work for: .....
2. Do you travel to work in transport provided by your employer: **Y/N**  
If Yes:
  - Is it a mini bus: **Y/N**
  - Do you pay for the transport: **Y/N**
  - Is the money deducted from your wages: **Y/N**
  - Have you given written consent for this money to be deducted: **Y/N**
3. Do you live in accommodation provided by your employer: **Y/N**  
If Yes:
  - How much does your employer deduct from your wages for the accommodation: £..... per week, or per month (please tick)
  - Have you given written consent for this money to be deducted: **Y/N**
4. Does your employer deduct anything from your wages other than Tax and National Insurance: **Y/N**
  - Have your given written consent for this money to be deducted: **Y/N**
  - What is the deduction for and how much do you pay: .....
  - .....
5. Do you have a contract of employment: **Y/N**
6. How were you recruited and were you made to pay for getting the job?
7. Have you signed a form agreeing to work more than 48 hours each week: **Y/N**
8. Have you been informed of your entitlement to:
  - Holiday pay **Y/N**
  - Sick pay **Y/N**
9. Are you in debt to your employer: **Y/N**

- 10. Has your passport been retained by your employer: **Y/N**
- 11. Do you have to pay for protective equipment such as safety boots: **Y/N**
- 12. Are you paid regularly: **Y/N**
- 13 How much are you paid per hour: £.....

DRAFT



**Annex 3 – Useful Links**

Gangmasters Licensing Authority  
[www.gla.gov.uk](http://www.gla.gov.uk)  
0115 900 8943

Association of Labour Providers (ALP)  
[www.labourproviders.org.uk](http://www.labourproviders.org.uk)  
Telephone: 01276 509 306

The Recruitment and Employment Confederation (REC)  
[www.rec.uk.com](http://www.rec.uk.com)  
Telephone: 0207 463 3265

Ethical Trading Initiative (ETI)  
[www.ethicaltrade.org](http://www.ethicaltrade.org)  
Telephone: 0207 841 5180

National Farmers Union (NFU)  
[www.nfuonline.com](http://www.nfuonline.com)  
Telephone: 024 7685 8500

National Farmers Union Scotland (NFUS)  
[www.nfus.org.uk](http://www.nfus.org.uk)  
Telephone: 0131 472 4000

Trade Union Congress (TUC)  
[www.tuc.org.uk](http://www.tuc.org.uk)  
Telephone: 0207 636 4030

Transport and General Workers Union (TGWU)  
[www.tgwu.org.uk](http://www.tgwu.org.uk)  
Telephone: 0207 611 2500

British Retail Consortium (BRC)  
[www.brc.org.uk](http://www.brc.org.uk)  
Telephone: 0207 854 8900

Fresh Produce Consortium (FPC)  
[www.freshproduce.org.uk](http://www.freshproduce.org.uk)  
Telephone: 0173 323 7117

Food and Drink Federation (FDF)  
[www.fdf.org.uk](http://www.fdf.org.uk)  
Telephone: 0207 836 2460

Sea Fish Industry Authority (SFIA)  
[www.seafish.org](http://www.seafish.org)  
Telephone: 0131 558 3331

Shellfish Association of Great Britain  
[www.shellfish.org.uk](http://www.shellfish.org.uk)  
Telephone: 0207 283 8305

Pay and Work Rights Helpline  
0800 917 2368  
<http://payandworkrightscampaign.direct.gov.uk/>

Forestry Commission  
[www.forestry.gov.uk](http://www.forestry.gov.uk)  
0845 3673787

Forest Service Northern Ireland  
[www.forestserviceni.gov.uk](http://www.forestserviceni.gov.uk)  
02890 524480

Forestry Contracting Association  
[www.fcauk.com](http://www.fcauk.com)  
0870 042 7999

Confederation of Forest Industries  
[www.confor.org.uk](http://www.confor.org.uk)

Best Practice Guide for Labour Users

September 2009

0 131 240 1410

Department for Environment, Food and Rural Affairs (DEFRA)  
[www.defra.gov.uk](http://www.defra.gov.uk)  
Telephone: 08459 33 55 77

Local Authorities Coordinators of Regulatory Services (LACORS)  
[www.lacors.gov.uk](http://www.lacors.gov.uk)  
England - 0207 7840 7200  
Wales - 0292 046 8609  
Scotland - 0141 222 2001

Northern Ireland Local Government Association (NILGA)  
[www.nilga.org](http://www.nilga.org)  
Telephone: 0289 024 9286

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**The GLA has printed a leaflet for workers entitled “Workers’ Rights”. Available in fourteen languages , this leaflet explains that workers are protected by law and outlines what they should expect from a UK labour provider operating in the GLA regulated sectors.**

**Other available documents include:  
Labour User Section on the Website  
GLA Labour User Handbook  
GLA Labour User Brochure  
GLA Labour User Newsletter  
DEFRA “Reasonable Steps” Guidance**

**Copies can be obtained by emailing [communications@gl.gsi.gov.uk](mailto:communications@gl.gsi.gov.uk) by phoning 0845 602 5020.**