



Gangmasters &  
Labour Abuse Authority

# Business Plan 2017 – 2018

April 2017

## Foreword

This annual Gangmasters and Labour Abuse Authority (GLAA) Business Plan provides specific detail emanating from the Strategic Plan 2017 – 2020 which sets out our aim, strategic priorities and objectives. It illustrates a clear framework by which the GLAA will deliver its service through continuous improvement thereby enhancing confidence and satisfaction from service users. This will create a platform where the exploitation of workers can be prevented; those who are abused can be protected and those who exploit will be relentlessly pursued through all legal and ethical means.

The GLAA Board will formally review this plan to ensure the aim, priorities and objectives are being met. In doing so the Board will satisfy itself, on behalf of the Secretary of State, that the GLAA delivers a cost effective and efficient service; steps are taken to prevent exploitation; workers are being protected; unlicensed activity is being addressed; and those operating within the regulations continue to be compliant. This will be achieved whilst easing the burden on the compliant business and enabling national economic growth.

## Introduction

The Gangmasters and Labour Abuse Authority (GLAA), formerly the Gangmasters Licensing Authority (GLA), works in partnership to protect vulnerable and exploited workers.

The Gangmasters (Licensing) Act 2004 (the GLA Act) was introduced following the death of 23 cockle pickers in Morecambe Bay in February 2004 and created a licensing scheme to regulate the supply of temporary labour to the farming, food processing and shellfish gathering sectors, establishing the GLA to administer that scheme.

The GLA Act aims to protect the most vulnerable workers employed in the regulated sectors by ensuring that those engaged in the supply of workers, or who use workers to provide a service, meet minimum employment and other standards.

The GLA Act also created four criminal offences arising from the licensing scheme of operating as an unlicensed gangmaster; entering into arrangements with an unlicensed gangmaster; obstructing GLA officers; and having false documentation.

The introduction of the Modern Slavery Act in 2015 increased public awareness and galvanised national focus on issues including labour exploitation and subsequently the Immigration Act 2016 legislated for a much broader role of the GLA including changing its name to the Gangmasters and Labour Abuse Authority.

As such, and enshrined within that Act, the GLAA will retain its licensing and regulatory function of temporary labour in the food and farming sectors whilst having a much broader role in terms of addressing labour exploitation across the entire labour market.

The Immigration Act also introduced other measures to address labour abuse including the creation of the Director of Labour Market enforcement, the requirement for the GLAA, Employment Agency Standards Inspectorate and the National Minimum Wage team of HMRC to work more closely together and for these agencies to discharge their duties in accordance with the Director of Labour Market Enforcement's strategy.

There are nearly 1,000 licensed gangmasters across the UK who supply approximately 464,000 temporary contracted workers in the regulated sector. The GLAA has civil powers to carry out inspections at application stage and throughout the duration of the licence to ensure compliance, as well as the ability to invoke additional licence conditions and suspend or revoke a licence depending upon the severity of the breach.

Through the introduction of the wider powers described below the GLAA will expand its role to work in partnership to protect vulnerable and exploited workers regardless of worker status or sector within England and Wales whilst operating with the GLA Act powers only in Scotland and Northern Ireland.

In practice the GLAA partnerships will include responsible parties within the entire UK supply chain with other supervisory and enforcement bodies plus non-government agencies. The GLAA will be unrelenting in its approach to disrupt labour exploitation in all its forms by any lawful, ethical and cost effective means.

Complementary to the regulatory aspect, the GLAA is working with law enforcement partners to identify, disrupt and dismantle serious and organised criminality, people trafficking and other crimes whereby criminal 'entrepreneurs' seek to exploit human assets for profit.

The GLAA, through increased funding from 2017-18, is expanding with additional staff to deliver its new national mandate in tackling labour abuse.

## Aim, Priorities and Objectives

The GLAA has a single overarching aim:

'Working in partnership to protect vulnerable and exploited workers'

### Strategic Priorities

This aim will be achieved by maintaining a continual focus on three strategic priorities:

- Preventing worker exploitation
- Protecting vulnerable people
- Pursuing those who exploit others for their work either financially, physically and or through coercion and control

### Strategic Objectives

To achieve these three strategic priorities, the GLAA has six objectives

- One** Disrupt criminal activity within the labour market
- Two** Engage with stakeholders to minimise and manage risk
- Three** Support compliant business
- Four** Work in partnership to protect workers' rights
- Five** Maintain a credible licensing scheme, creating a level playing field and promoting growth
- Six** Identify and support victims of labour exploitation

## Strategic Programme of Activity

During the lifetime of this Business Plan, the GLAA will engage in three specific areas of work and will:

- Prevent** prevent workers from being exploited for their labour
- Protect** protect workers and potential victims so making them less vulnerable to being exploited for their labour
- Pursue** relentlessly pursue, disrupt and prosecute those who engage in the exploitation of workers

These areas of activity will be underpinned and driven by:

- Good governance,
- Effective use of budgets to target areas of maximum impact and to achieve value for money,
- Maximising the use, expertise and deployment of staff,
- Employing effective risk mitigation practices and processes,
- Gathering and analysing intelligence,
- Enhancing relationships and joint working with all partner bodies,
- The effective use of international best practice, and
- Development with stakeholders of the GLAA 'Innovation Lab'.

## New Powers

The Immigration Act 2016 introduced changes to the landscape to tackle exploitation, which identified the GLAA as a key contributor in making the UK a world leader in eradication of forced labour. This included specifying the GLAA as a first responder in the identification and referral of victims, as well as supporting the work of the Independent Anti-Slavery Commissioner. It also continues to support the Transparency in Supply Chains requirements through the training it delivers to the industry in partnership with the University of Derby.

In addition to retaining powers to investigate offences under the GLA Act 2004, changes to the GLAA have resulted in the creation of appropriately trained and accredited officers (Labour Abuse Prevention Officers (LAPOs)) to investigate offences under the Employment Agencies Act 1973, National Minimum Wage Act 1998, and Modern Slavery Act 2015 (in respect of forced labour), but limited to England and Wales. LAPOs have also been given powers under the Police and Criminal Evidence Act 1984 to search for and seize evidence. A number of staff are already designated as LAPOs and it is intended that all GLAA operational staff will be trained and accredited by 2018.

The Government has also introduced measures in the Immigration Act 2016 to provide a more coherent framework for identifying and preventing abuses of labour market legislation, and to strengthen the enforcement response. This includes new powers to apply Labour Market Enforcement (LME) undertakings and orders, which are intended for more serious or persistent offenders where this type of intervention is judged appropriate to prevent further offending.

The new system of undertakings is designed to complement the existing powers already available to the three enforcing authorities, and to be deployed where appropriate to prevent further labour market offences. These existing powers include:

- prosecution for offences under National Minimum Wage, Employment Agencies and Gangmaster Licensing legislation;
- the imposition of civil penalties and “naming and shaming” (for businesses which fail to comply with the National Minimum Wage Act);
- the imposition of prohibition orders preventing a person from carrying on an employment agency or employment business;
- the refusal or revocation of a licence to act as a gangmaster; and
- lower level administrative measures such as warning letters.

Prosecution under existing legislation will remain available for the most serious offenders and enforcing authorities should consider on a case by case basis which sanction is most appropriate in the circumstances. The best response may be a combination of an existing civil or criminal penalty and a LME undertaking.

The introduction of the new LME undertakings and orders regime is integral to the Government’s intention to introduce a broader and harder edge to enforcement of labour market offences where these are committed deliberately or recklessly and are not simply a consequence of a straightforward administrative error. The purpose of labour market legislation is to ensure there is a level playing field for legitimate competition between law-abiding businesses, in which workers are guaranteed the national living wage and are protected from exploitation. These objectives are undermined if these important legal protections are not upheld and enforced. Tackling non-compliant business promotes growth by removing unfair competition.

The new regime of LME undertakings and orders are statutory documents and means that, for the first time, a prison sentence can ultimately result from some key labour market offences which currently only attract a civil penalty or criminal fine. A two-year custodial penalty and/or unlimited fine is available where a business breaches a LME order which has been made by a court either following conviction for a trigger offence or on application from an enforcing authority.

These unprecedented changes to how the GLA/GLAA operates will not dilute in any way the licensing and compliance regime that has been developed with the industry over the last ten years but will see the GLAA being able to respond, protect workers and prevent labour exploitation regardless of sector. The GLAA will necessarily focus its finite resources on those sectors presenting as highest risk to vulnerable workers.

In recognition of the extended powers LAPOs will come under the oversight of the Independent Police Complaints Commission. The GLAA will also be subject to voluntary inspection by HMIC in the use of its new criminal powers from 2018 onwards.

The GLAA also welcomes other oversight and scrutiny already provided by the Office of the Surveillance Commissioner and the Interception of Communication Commissioner in relation to criminal investigatory matters and the Parliamentary and Health Service Ombudsman for civil issues.

## Director of Labour Market Enforcement

The Immigration Act 2016 created the role of Director of Labour Market Enforcement to establish greater co-ordination of the enforcement bodies (GLAA, Employment Agency Standards Inspectorate, and National Minimum Wage Unit of HMRC) to drive effective activity.

On 5 January 2017, the Home Secretary and the Secretary of State for Business, Energy and Industrial Strategy announced the appointment of Professor Sir David Metcalf CBE. The Director's primary functions will include setting the strategic direction of the enforcement bodies; publishing an annual report and leading an Information Hub, with information drawn from the enforcement bodies and beyond. The hub will provide the Director with a single view of risk and priorities across the spectrum of non-compliance – from accidental payroll errors to serious criminality.

During 2017-18 the GLAA will work collaboratively with Sir David Metcalf and his team.

## Operational Landscape

The first national threat assessment illustrating the scale of labour exploitation and modern slavery across the UK was completed in December 2016 by the GLAA with information and intelligence drawn from a wide range of sources. This can be summarised as follows:

- There are 10 -13,000 victims of modern slavery in the UK and 45 million worldwide (Home Office statistics)
- There has been a fivefold increase in potential victims of slavery in three years of which 55 per cent were labour related (3200+) (NCA statistics)
- Low paid, low skilled workers employed in sectors subject to seasonal or other peaks of supply and demand are particularly vulnerable (2016 GLAA National Assessment)
- The prevalence of labour exploitation in the GLA regulated sector is known and understood (financial, physical, psychological - coercion and control – 2016 GLAA National Assessment)).
- The intelligence picture of modern slavery and human trafficking, though improving, remains fragmented. A significant increase in collection, collation and analysis is required to comprehensively understand and mitigate the threat (2016 GLAA National Assessment).

The areas of the national labour market considered at highest risk from exploitative practices are listed below and these span the full spectrum from being suspected of failing to pay the minimum wage to forced labour:

- Food/catering
- Carwashes
- Construction
- Bogus self-employment
- Traveller communities providing itinerant labour
- Cleaning/Hospitality
- Nail bars
- Social care

Where the opportunity exists to commit a crime or breach a civil law without detection or sanction it is likely that such behaviour will expand, and foster greater criminality if unchecked. It is substantially evidenced that simple breaches of labour law creates the environment in which more extreme forms of abuse of workers can occur, leading to labour exploitation and forced or compulsory labour (modern slavery).

The GLAA's regulatory structure is based on an intelligence-led risk based approach and is internationally lauded as a highly effective situational crime prevention model, enabling easier identification of minor labour law breaches and preventing more exploitative practices to develop. Other countries including Bulgaria, Australia, Ireland and Lithuania have adopted the GLAA operating model.

## Changes to Operating Model

In order for the GLAA to continuously adapt and evolve to meet the operational challenges as outlined above, significant changes are required to the GLAA operating model.

Hitherto the GLAA has been a regulator with the scope to investigate a narrow area of criminality. Its new role and resources will protect and sustain this approach but also enable it to investigate more instances of labour abuse across the entire labour market.

To aid the GLAA meeting this demand, the Home Office has increased the GLAA's budget by £2.6m for 2017-18.

To measure the impact of this uplift, as well as business as usual, a revised performance monitoring and impact framework has been created that will assess the impact of outputs and outcomes and will be linked to individual and team diagnostic indicators to ensure productivity and efficiency of all aspects of the GLAA is maximised. This will be assessed weekly, monthly and quarterly by the Executive/Board and monthly, and annually by the Home Office.

In addition Her Majesty's Inspectorate of Constabulary will, from 2017-18, inspect the GLAA's application of policing style powers – Modern Slavery and Police and Criminal Evidence Acts. This will be in addition to the regular internal audits, National Audit Office biannual visits and the production of the GLAA annual report and accounts.

At an operational level, the GLAA will maintain its intelligence-led and risk based approach meaning that compliance and enforcement activity will be carried out following information received and not on a percentage, random, or quota basis.



# Delivering the Plan

## Values

The GLAA strongly believes that providing a high quality of service to the public is not simply about what it does; it's equally about the way it's done. Its values are shared by all staff and are the foundations that underpin the delivery of the aim, priorities and objectives:

- P** Professional
- R** Respect
- O** One team
- U** Utmost integrity, trust, openness
- D** Doing it differently

## Resources

The GLAA is fully funded by the Home Office which provides an annual budget. The 2017-18 expenditure is £7.6m. This represents an increase in funding of £2.6m from 2016-17 which is to reflect the increase in role, powers and responsibility the GLAA has from spring 2017.

Currently the GLAA employs 71 people, 31 of whom are based at its head office in Nottingham, providing core central functions including: licensing; the collation, analysis and management of intelligence based on a threat and risk methodology; finance, communications, IT and HR.

A further 37 Intelligence Officers, and Enforcement and Compliance Officers, together with their three managers, are home-based in locations throughout the UK, to maintain the licensing scheme and investigate suspected criminality.

Approximately 55 new staff (33 investigative plus central support) will be recruited within 2017-18 taking the total number of staff in the GLAA to c125 by April 2018.

In addition, the GLAA intends to consider the development and progression of alternative funding streams in the 'prevent and protect' space, working with industry to create strategies which will deliver more effective protection for the vulnerable. This will include identifying exploitative practice before it manifests itself as more serious abuse, working with businesses across their entire supply chains and overseas and upstream if necessary.

By way of example, many workers in the food supply chain are already vulnerable, due to a number of factors that would fall short of action required by statutory authorities. The workers may have pre-existing financial, physical, social or psychological pressures which, if left unnoticed or not addressed, leave the worker highly susceptible to being exploited for their labour.

These vulnerabilities include: shared and overcrowded accommodation; unfamiliar surroundings; no or very little spoken English; detachment and isolation from family and friends; third parties holding travel documents (hence movements controlled). People are

also susceptible to coercion and psychological control after having been isolated or having their movements restricted..

The GLAA will work with business to manage down the vulnerability of workers through training, awareness raising, conducting compliance inspections for companies falling outside the scope of licensing and other preventative activities designed to increase knowledge and awareness of non-compliance, which can often be a pre-cursor to more serious forms of abuse. For example:

- Joint training/awareness with the retail sector non-food areas regarding vulnerability profiling of single points of failure in supply chains
- Secondment of Romanian labour inspector to the GLAA
- Training of airline staff from known source countries to spot the signs of exploitation
- Expansion of GLAA involvement with Stronger Together awareness sessions in construction
- GLAA officers embedded within specific police forces involved in live investigations of labour exploitation.

## Measuring Impact

The GLAA will be held to account by its Board, the Home Office and the Director for Labour Market Enforcement for its activity in furtherance of its strategic aim, priorities and objectives. Outputs and outcomes will be measured through a suite of performance indicators which will be used to evaluate the success of this business plan.

In order to demonstrate the impact and difference made by GLAA activity, performance will be measured at a strategic level against five key performance questions.

Performance at a strategic level against the key performance questions will be reported to the GLAA Board, Home Office and Director of Labour Market Enforcement on a quarterly basis to ensure appropriate oversight, scrutiny and governance.

The GLAA business plan will outline the operational performance indicators and measures which will demonstrate progress against the strategic objectives. Performance against these measures will be reported on a monthly basis to ensure oversight and governance. This data will also be used to inform the assessment against the five key performance questions.

Each key performance question will have a subset of performance measures and indicators. This will ensure consistent and continuous monitoring and evaluation of activity and an indicator of value for money. These measures will include quantitative and qualitative values in order that the impact of activity can be demonstrated and evaluated.

GLAA operational activities are tasked with the intention of disrupting serious and organised criminal groups, individuals who exploit workers and protect those who are vulnerable.

The National Crime Agency Disruption Manual provides a range of disruption and prevention capabilities and specialist knowledge which can be used to disrupt and cut serious and organised crime. Covert activities – such as surveillance and intelligence development – will not themselves disrupt; however, they will underpin the operational

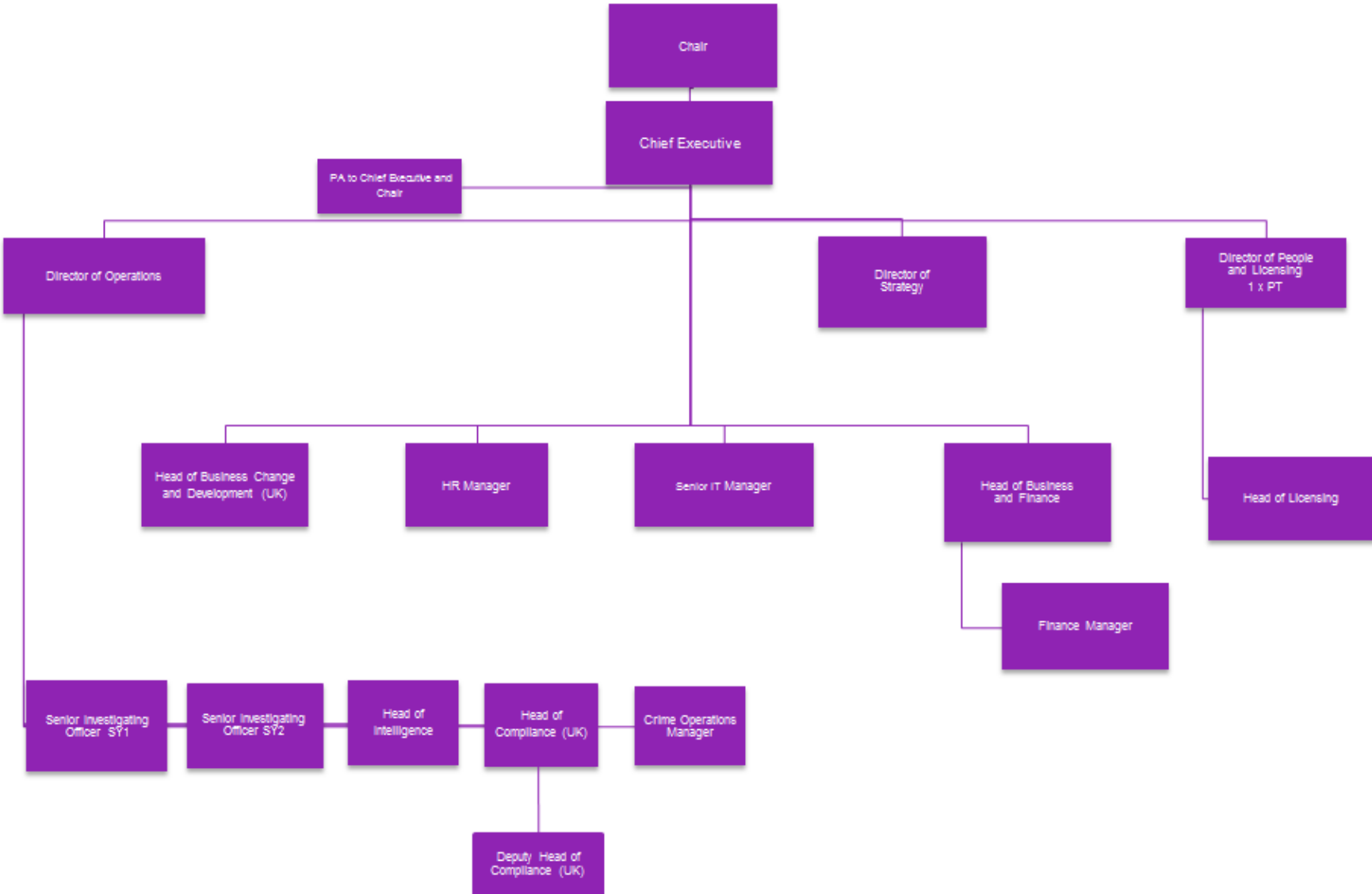
activity that does, either in support of GLAA activity or that of other law enforcement partners.

Any law enforcement activity is potentially a disruptive event and will be recorded and assessed. This assessment provides an indication of whether or not the GLAA is relentlessly disrupting those involved in labour exploitation, and will be used to inform decision making and performance reporting.

The GLAA will continually review and monitor what and how disruptions are captured and measured and how it works with partners.

Due to the change in the role of the GLAA from spring 2017 some of the pre-existing indicators used to date are being superseded. However, in order to maintain momentum and measure performance and impact in the transition year of 2017-18 the pre-existing headline measures will be retained to run alongside the new indicators. This will ensure that focus in the current regulated sectors of the labour market is not diluted as the new GLAA powers come into effect.

# GLA Management Structure



## Key performance questions 2017-20

Key Performance Questions 2017-20	
Prevent	
1	How comprehensive is the GLAA's understanding of the scale and threat of labour exploitation in the UK?
2	How effective is the GLAA's response to the identified threats of labour exploitation and modern slavery?
3	How effective is the GLAA at working with partners to tackle labour exploitation and modern slavery?
4	How effective is the GLAA at working with business, labour users and providers to drive up standards, preventing and tackling labour exploitation and modern slavery?
5	How effective is the GLAA at managing its resources?

A full range of diagnostic indicators exist to measure performance under the five key questions which are all linked to the strategic objectives. These will be available in a separate performance and insight pack containing all the detailed information.

## Stakeholder Engagement

The GLAA is a small organisation that carries significant responsibilities. Stakeholder engagement remains at the core in delivering its objectives.

The GLAA will widen its stakeholder base to reflect its extended powers and responsibility in addressing labour exploitation. Mechanisms are in place to demonstrate an ongoing commitment to prompt, clear and two-way communication with all our stakeholders. A formal communications strategy to maximise all means of contact will continue to evolve during and beyond the lifetime of this plan. In 2017-18 the GLAA will continue to run its liaison groups for Labour Users/Providers and also for Worker/NGOs which are chaired by Board members and designed to act as critical reference groups to facilitate debate from key stakeholders and enable them to discuss and influence policy and strategy. These groups complement the formal governance arrangements provided by the Board to ensure a fully inclusive and integrated engagement environment exists between the GLAA, its Board and industry.

In 2017-18 the GLAA will continually strive to enhance its relationship with its 'Delivery Partners' across the private, public, voluntary and faith sectors to ensure it meets the needs of the workers and the industry. Specific events will include the GLAA national conference, involvement in the Santa Marta group and Worker/NGO liaison groups. Such activity will be coordinated to complement the work of the Director of Labour Market Enforcement.

In 2017-18 the GLAA will continue its membership of the NCA led National Strategic and Tactical Tasking mechanisms, the Modern Slavery Threat Delivery Group on behalf of the national policing lead and the Director of Labour Market Enforcement Strategic Coordinating Group which oversees the activity of GLAA, EAS and NMW.

The GLAA will also embed officers into regional government agency intelligence networks.

These processes are designed to ensure that the threat of labour exploitation in all its forms is identified, managed and mitigated, with the protection of vulnerable workers being at the centre of all activity.

## People

Our objective is to ensure that all employees are engaged with and equipped to meet the strategic objectives of the GLAA. The key areas that the GLAA will continue to focus on in 2017-18 are:

- Developing our existing workforce as well as recruiting the right people with the right skills in order to effectively transition to the GLAA.
- Timely and clear internal communication of organisational change to maintain motivation and business continuity during a critical period of change.
- Improving employee engagement by taking action on feedback received through internal communication channels such as the staff survey and employee forums.

- Review our reward and recognition systems to link to performance as well as support the achievement of the above areas.

## Learning and Development

Investment in staff by providing relevant, timely and appropriate learning and development opportunities is at the core of business and development needs for any organisation. It is imperative that GLAA staff have the necessary skills to fulfil the duties asked of them.

The GLAA supports staff in attaining and enhancing skills through a number of means. These include utilising e-learning through Civil Service Learning, specialist training courses, job shadowing, secondments and volunteering opportunities. The GLAA actively encourages completion of Personal Development Plans and all managers are asked to identify any training needs as part of the performance appraisal process. All staff are encouraged to have five learning and development interventions each year.

In preparation for taking on its new powers, in 2016-17 the GLA started a programme of training for its existing staff, 6 of whom are now authorised to act as LAPOs having completed training to the required standard. This programme will continue in 2017-18 both for existing and new staff. The GLAA will ensure that all operational staff has the required skills and knowledge to fulfil respective roles. This will include enhancing the skills of those who will operate as LAPOs along with ensuring that all are aware of the powers which are available to them.

## Licence Fees and Licensing Standards

During 2017-18, the GLAA will work with the Home Office on reviewing the Licensing Standards. The Standards were last reviewed in 2012 and therefore it is necessary for the GLAA to reflect changes in regulations and employment law in a new version of the Standards. The GLAA will provide opportunities for stakeholders to engage in the process through events specifically aimed at service users.

The terms of the Gangmasters Licensing Act allows the GLAA to set a fee for the provision of a licence. Although the GLAA has maintained the same licence fee charges for both applications and renewals for a number of years, it is intended that this will be reviewed in 2017-18.

The GLAA is keen to deliver an excellent service at the lowest possible cost in order to maximise the efficiency and productivity of the GLAA.

As an intelligence-led organisation, the GLAA responds to threat and harm using a risk based approach to improve efficiency. This will mature over the financial year to an activity based costing model.

The GLAA's projected licence fee income for 2017-18 is £800,000 based upon circa 1,000 fee paying licence holders.

## Other Income

In 2017-18 the GLAA will consider exploring alternative funding streams that support its strategic objectives, particularly around the prevent and protect themes that relate to labour exploitation.

## GLAA Transition

The GLAA currently operates within the Defra IT platforms. During 2017-18, the GLAA will continue with the programme of work commenced in 2016-17 to move its IT infrastructure onto the Home Office Technology platforms. This will include the migration of e-mails and shared folders, the distribution of new laptops and also the movement of applications, which support functions such as payroll and investigation case management, to a cloud hosted environment. In addition to utilising the latest technology available within the Home Office it will improve GLAA IT resilience.

## Licensing System

The GLAA will develop and introduce a new licensing system to replace its current Licensing Application Workflow System. The new system will take into account research conducted across a range of internal and external stakeholders and will be built to meet the requirements of the Government Digital Service. The new system will bring improvements to the public facing elements of the system along with streamlining internal processes.

## Governance

A governance board of up to eight independent members plus a Chair provide the scrutiny, oversight and governance of the work of the GLAA. This meets quarterly.

The GLAA also has an Audit and Risk Committee and a Remuneration Committee. These quarterly meetings offer guidance and recommendations to the main Board, thereby enabling it to concentrate on matters of most strategic importance.

The GLAA is audited regularly through Government arrangements with Home Office auditors and the National Audit Office, and is accountable to the Home Office's Crime, Policing and Fire Group Directorate.



## Financial Strategy

In recognition of its increased role and remit the GLAA has received a cash resource budget increase of £2,560,000 resulting in a gross expenditure budget of £7,580,000. This was almost a 60 per cent increase on GLAA funding.

The GLAA has balanced its Medium Term Financial Plan against the funding forecast provided by the Home Office which includes additional resourcing requirements in 2017-18.

Funding	2015-16 £	2016-17 £	2017-18 £	2018-19 £	2019-20 £
Cash	3,968,000	4,500,000	7,060,000	7,100,000	7,115,000
Non Cash	200,000	335,000	350,000	350,000	335,000
<b>Total Funding</b>	<b>4,168,000</b>	<b>4,835,000</b>	<b>7,410,000</b>	<b>7,450,000</b>	<b>7,450,000</b>

NI/Other Income	157,000	125,000	170,000	170,000	170,000
Total Expenditure Budget	4,325,000	4,960,000	7,580,000	7,620,000	7,620,000

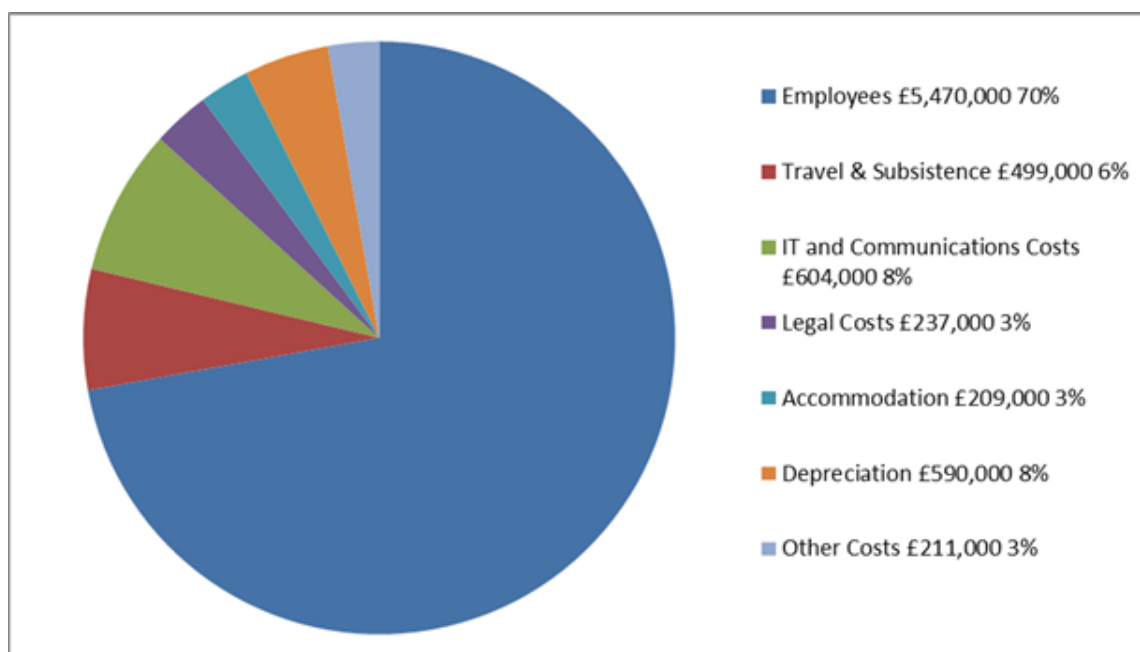
Increase/(Decrease) – All	0	667,000	2,620,000	40,000	0
Cash	0	532,000	2,560,000	40,000	15,000
Non cash	0	135,000	15,000	0	(15,000)

Cumulative Cash Increase	0	532,000	3,092,000	3,132,000	3,147,000
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The GLAA has also been allocated capital funding to help it address legacy IT issues and transition to the GLAA.

## Expenditure 2017-18

The GLAA Gross Budget Expenditure for 2017-18 is £7,580,000 and a high level breakdown of this budget is provided below. During 2017-18 the GLAA will put in place structures to support its wider role and remit in line with allocated funding.



## Risk Management

Managing risk in all aspects of the work of the GLAA is critical to ensuring that a consistently high level of service is delivered. The GLAA has a risk management strategy which is the framework for identifying, evaluating, managing and mitigating risks, including setting risk appetite and risk tolerance levels. The risk register is reviewed annually by the Board and key risks are considered at every Board meeting. Detailed risk reviews are undertaken by the Audit and Risk Sub-committee of the Board chaired by a board member. A process for the escalation to the Home Office of serious organisational risks is followed.

A key aspect of risk management is about identifying the risks to vulnerable and exploited workers, evaluating those risks and deciding on the best course of action to address them. Threat, harm and risk and its subsequent impact on the labour market is assessed and managed through a robust tactical and strategic tasking and co-ordinating process which is linked to the national process overseen by the National Crime Agency and UK police forces. The GLAA Chief Executive chairs the national modern slavery delivery group on behalf of UK law enforcement. For those who may be victims of labour exploitation, the vulnerability of each individual and case is scrutinised and continuously assessed by each agency on a case by case basis and escalated as necessary should support be required.

The GLAA will be unrelenting in its approach to disrupt labour exploitation in all its forms by any lawful, ethical and reasonably cost-effective means.

In 2017-18 the GLAA anticipates that the key risks it will face are:

## Capacity and Capability

Capacity - succession/retention/growth - GLAA will need to continue to grow and subsequently maintain the size and shape of the workforce to deliver its expanded statutory role. This will be mitigated by the continued recruitment and training of staff across the UK in accordance with its specific selection and training plan. By April 2018, GLAA will have 125 full time equivalent staff that will be deployed according to threat, risk and harm. An annual update of the national threat assessment of the nature and scale of labour market exploitation will review the strategic threat, harm and risk underpinned by dynamic operational tasking and coordination of resources.

Capability - Building the skills the GLAA needs to meet current and future requirements - the breadth and depth of skills and capabilities present within a workforce, and how well aligned these are to the GLAA's needs. A comprehensive training needs analysis programme is in place to ensure that all staff continue to have the right skills to discharge their statutory duties in whichever of the three jurisdictions they work in. Of paramount importance will be the ability to recognise and protect vulnerable workers, those seeking to exploit them and the skills required to bring those abusers to justice. Where appropriate, GLAA officers will train with other agencies operating in this field.

## OFFICIAL SENSITIVE

Efficiency and Productivity – Ensuring sufficient and sustainable funding is available for ongoing GLAA activity. A zero based budgeting and outcomes based productivity model is embedded within GLAA to ensure that full cost benefit from the funding it receives is realised. These processes are examined by the Audit and Risk Committee and a full programme of audits by Home Office and National Audit Office ensure value for money is being maximised.

### Legacy IT

GLAA is on a costly and unsustainable IT platform that lacks resilience. At the time of this report the GLAA remains on Defra IT, however, transition to the Home Office platform will be completed this year. This is a major project involving the core IT platform, the public facing licensing system, all hardware and telephony and is being managed through a formal Transition Programme Board chaired by the GLAA Chair and comprising Home Office, GLAA officers, Government Digital Service, Home Office Technology, Finance and IT specialists. The project is on target to be delivered during the course of 2017-18.

### Stakeholder Engagement

The GLAA works in partnership with various stakeholders to deliver its objectives. With the changing role of the organisation and increased austerity there is a risk that partnership working may reduce. High levels of support have always been achieved from the regulated sector. There is however a risk that the organisation fails to understand or meet new stakeholder expectations. A comprehensive communications and engagement strategy is in place to deliver the development, implementation, governance and evaluation of strategic and tactical communications, both internally and externally, for GLAA in order to help protect vulnerable and exploited workers. The plan will direct the implementation and evaluation of strategic and tactical communications plans to raise public awareness and understanding of labour exploitation and modern slavery, assist the GLAA in achieving its strategic objectives and enhance the authority's reputation. This approach will be regularly reviewed and assessed by the GLAA Board and its liaison groups.

### Legal

There remains an ongoing likelihood that court action against the GLAA will occur in respect of some of the decisions it makes. There is a risk of penalty resulting from non-compliance with legal requirements and that losing a court action may lead to harm to the policy objectives and financial or reputational loss. This is continuously mitigated by the licensing and Tribunal processes for civil cases and through internal case management and the Crown Prosecution Service for criminal cases. This is followed up within the GLAA through a robust structured debrief of all cases including patterns and trends of 'cracked' or broken cases and the reasons for that. Criminal cases are seldom prosecuted in isolation from police forces and debriefs are held in partnership where this is the case.

### Summary

The business plan provides a mechanism to demonstrate oversight and scrutiny by the GLAA Board, Home Office and its stakeholders.

Most importantly this business plan will evidence that the GLAA is meeting its strategic aim of working in partnership to protect vulnerable and exploited workers.