



Gangmasters &  
Labour Abuse Authority

# GLAA57/13 Stakeholder Engagement

17 January 2018

# **Board Paper Reference – GLAA57/13 - Stakeholder Engagement**

## **1. Purpose of the Report**

1.1 To update the board on the work of the liaison groups.

## **2. Recommendation**

2.1 The Board is invited to note the minutes at Annex A of the

- Worker/NGO Liaison Group held on 1 November 2017.
- Labour User/Labour Provider held on 23 November 2017.

**Report Author: Jennifer Clarke**

**Senior Responsible Officer: Darryl Dixon**

# Minutes

**Title of meeting**                    **Worker/NGO Liaison Group**  
**Date**                                    1 November 2017                    **Time**                                    1130  
**Venue**                                    2 Marsham Street  
**Chair**                                    Linda Dickens                    **Secretary**                                    Lysbeth Ford

**Attendees**

Linda Dickens (LD) Board Member – Chair  
 Avril Sharp (AS), Kalayaan  
 Bridget Henderson (BH) Unite  
 Caroline Robinson (CR), Flex  
 Chris Tilley (CT), Immigration Enforcement  
 David Dickens (DD) Fishermen’s Mission  
 Kasia Zagrodniczek (KZ) Eastern European Advice Centre (KZ)  
 Justin Bowden (JB) GMB  
 Lidia Estevez (LE) The Connection of St Martins  
 Matthew Creagh (TUC)

Lysbeth Ford (LF), GLAA  
 Margaret Beels (MB), Chair, GLAA  
 Paul Broadbent (PB), CEO GLAA

**Apologies**

Andrew Wallis (AWA) Unseen UK  
 Andrew Wileman, Salvation Army  
 David Carrigan, Citizens Advice  
 David Gill, USDAW  
 Diana Holland, Unite  
 Jerry Swain, UCATT  
 James Tullett, Migrant Help  
 Lucila Granda, Latin American Women’s Rights  
 Narmanda Thiranagama (NT) Unison

<b>1.</b>	<p><b>Welcome and introductions</b></p> <p>Linda Dickens welcomed attendees from the Worker/NGO Liaison Group. Attendees introduced themselves.</p>
<b>2.</b>	<p><b>Apologies</b></p> <p>Noted as above.</p>

3.	<p><b>Minutes of the previous meeting</b></p> <p>The minutes of the previous meeting were agreed as an accurate record.</p>
4.	<p><b>Actions arising from the previous meeting</b></p> <p>a. PB to consider sharing of information more widely – An updated strategy would be presented at the GLAA board on 8 November – these changes would then be implemented and become business as usual. <b>Closed</b></p> <p>b. Administrative removals in relation to modern slavery victims – to be covered under item 5 below. <b>Closed</b></p> <p>c. PB to look into the background regarding the welfare check on a domestic worker as part of Operation Aident and contact AS, Kalayaan. <b>Open</b></p> <p>d. Commissioning independent research into the effectiveness of the GLAA – GLAA had commissioned the University of Sheffield to evaluate the effectiveness of licensing, this would also include revisiting the previous evaluation carried out in 2008. <b>Closed</b></p> <p>e. Consultation on the work in Fishing Convention – the results of the consultation are expected in early 2018. <b>Ongoing</b></p> <p>f. DD informed the group that the Marine Management Organisation did not know how many migrants there are in the fishing industry.</p> <p>g. EASI regulation of recruitment agencies in the cleaning industry. An email clarifying the position had been sent to all members of the group <b>Closed</b></p>
5.	<p><b>Relationship between the GLAA and Immigration Enforcement / Effects of the Immigration Act</b></p> <p>Chris Tilley, Immigration Enforcement Lead for Illegal Workers, outlined his responsibilities, noted the various committees and working groups etc. with which he was involved and the way in which various agencies interacted.</p> <p>CT then highlighted the threats and trends in relation to illegal working, as follows:</p> <ul style="list-style-type: none"> <li>• Demand for labour high across all sectors which is driving illegal working</li> <li>• Forced labour and human trafficking are key concerns associated with the widespread use of counterfeit documents, the facilitation of criminal networks in providing services for illegal workers, and the associated use of sub-standard accommodation</li> <li>• Use of forged non-EA documents become more sophisticated; more northern European passports being used by those masquerading as EU citizens; problems relating to claimed qualifications by workers who are unqualified.</li> </ul> <p>CT outlined various programmes being developed to improve compliance and transparency including digital status checking for use by business and workers.</p>

	<p>During discussion CR queried what the law enforcement process was for deciding on which agency took the lead in any joint investigation. This was explained.</p> <p>DD asked about cross department working and whether that would extend to Health and Safety Executive. This is the case.</p> <p>Various people raised the issue of perception and treatment of an illegal worker as 'victim' or 'offender'. MC asked about the requirement for greater awareness and training, particularly for front line enforcement staff and if there is a fixed protocol with cross operational work. CT stated no one protocol would cover all operational work and each case would be assessed on its own merits.</p> <p>DD asked that the GLAA do not lose sight of UK citizens who find themselves in debt bondage and is this still high on GLAA agenda. PB confirmed it was and that the protection of victims always takes primacy.</p>
6.	<p><b>Terms of reference and future meetings</b></p> <p>The group terms of reference were reviewed and found to be fit for purpose. Suggestions were made as follows: The third bullet point to be amended to remove 'GLAA regulated sector' and replace with 'labour market' to reflect GLAA wider remit. Consideration to be given to including a phrase relating to the input from the liaison groups assisting the Board in its oversight role.</p> <p><b>Operation of the Group</b></p> <p>The location of future meetings was debated to allow for the best and most inclusive membership and allow attendance of appropriate GLAA staff. Agreed that meetings would continue in London. Forward planning of topics would allow invitation to be made to relevant GLAA staff for particular meeting.</p> <p>DD stated it would be interesting to have asked LP/LU group for its views on what the Worker/NGO group might look at as it would provide insight from parties who are experiencing difficulties in sourcing workers.</p> <p>A discussion took place as to how statutory authorities engage with homeless charities.</p> <p>MC stated he would like to hear about joint investigations.</p> <p>DD stated it would be useful to have a presentation to the group from a potential victim of modern slavery.</p> <p><b>Action</b></p> <ul style="list-style-type: none"> <li>• GLAA to revise TORs as suggested above.</li> <li>• GLAA to take suggestions above into account when drafting a work plan for the group.</li> </ul>

<p><b>7.</b></p> <p><b>(a)</b></p>	<p><b>CEO update</b></p> <p><b>Performance and insight report</b> PB gave an update on performance, issues and events in the last quarter.</p> <p>CR asked if there was an increase in intelligence from sources outside the GLAA sectors which PB responded there was.</p> <p>CR stated that FLEX had outlined to Sarah Newton MP that GLAA needed further resources to meet its new remit.</p> <p>MC asked about the provision and use of the LMEU/O's. PB responded by outlining the current challenges of some potential LMEU's getting to court and promised to update at future meetings.</p>
<p><b>8.</b></p> <p><b>(a)</b></p> <p><b>(b)</b></p>	<p><b>Communications</b></p> <p><b>Anti-Slavery Day</b> All meeting members were engaged in a wide variety of activities to raise the profile of modern slavery.</p> <p><b>Review of GLAA conference</b> Attendees were updated on the well-attended GLAA conference held in Birmingham in October. Overall feedback was positive.</p> <p>BH express concern over the appropriateness of a presentation by Rosie Ayliffe. She also considered the GLAA training video on spotting exploitation which was shown at the conference reflected male gender bias and noted that she had been cold called by the production company. PB will look into the latter issue.</p> <p><b>Construction industry protocol</b> was launched at the conference, lots of positive new ideas – feedback can be found on <a href="http://www.slido.com">www.slido.com</a> - #glaacom17 with access to all presentation and videos.</p> <p><b>Action:</b></p> <ul style="list-style-type: none"> <li>• PB to look into cold calling of conference attendee by production company.</li> </ul>
<p><b>9.</b></p>	<p><b>DLME Strategy</b></p> <p>The meeting was updated as to the timetable for production of the Director's Strategy which would be early 2018.</p> <p>Concern was raised as to the launch of a NCA video highlighting exploitation in the fishing industry which was produced without industry input. PB agreed to feed this back to the NCA. Based on current intelligence, the fishing industry did not register as highly as other higher risk sectors.</p> <p>MC asked about the concept of joint liability as suggested by DLME. No further detail is known at this time.</p>

	<p>PB agreed to assess if any further intelligence existed around supply teachers being asked to work for free and who are employed through umbrella companies Any information would be passed to HMRC National Minimum Wage Unit.</p> <p><b>Action</b></p> <ul style="list-style-type: none"> <li>• PB to feedback comments to the NCA regarding the fishing video.</li> <li>• PB to pass any relevant intel to NMW team re supply teachers employed through umbrella companies</li> </ul>
<b>10.</b>	<p><b>Review of Licensing Standards</b></p> <p>This work is slow but ongoing.</p>
<b>11.</b>	<p><b>Worker Exploitation</b></p> <p>A discussion took place about attendees' concerns and current issues relating to current data and trends.</p> <p>CR raised the issue of woman workers and highlighted feminised sectors. Joint partnership working would improve understanding and it would be good to have discussion on this topic with this group.</p> <p>BH asked for clarification on farmer to farmer loans and if would be used outside the regulated sector. PB to report back.</p> <p><b>Action:</b> PB to report back on 'farmer to farmer' loans outside of the regulated sector.</p>
<b>12.</b>	<p><b>LU/LP Liaison minutes</b></p> <p>The minutes from this meeting were noted.</p>
<b>13.</b>	<p><b>Any other business</b></p> <p><b>(a) Eliminating recruitment fees – task and finish group</b> Attendees were offered the opportunity to join a task and finish group with ALP and others which would then report to the Joint Stakeholders meeting in February.</p> <p>LD asked the group for suggestions as to the format and topics for next joint meeting with LU/LP stakeholders.</p> <p>DD stated that a cross-party working group would be useful.</p> <p>CR stated that a small working group would be useful to discuss L.P.</p>

Annex A

	<p>Other suggestions included working through a case study; minimum wage enforcement; intelligence sharing issues and women workers/gender exploitation.</p> <p><b>Action</b></p> <ul style="list-style-type: none"><li>• Members to consider volunteering for task and finish group on recruitment fees (By 18 December please).</li></ul>
<p><b>14.</b></p>	<p><b>Date of next meeting</b></p> <p>Joint LU/LP and Worker/NGO liaison group, 28 February 2018, 1100 – 1430, GLAA Offices, Apex Court, Nottingham.</p>

# Minutes

<b>Title of meeting</b>	<b>Labour Provider and Labour User Liaison Group Meeting</b>		
<b>Date</b>	23 November 2017	<b>Time</b>	11am
<b>Venue</b>	GLAA, Nottingham		
<b>Chair</b>	Marshall Evans	<b>Secretary</b>	Katie Taylor
<b>Attendees</b>	<b>GLAA</b> Marshall Evans (ME) Margaret Beels (MB) Paul Broadbent (PB) Nicola Ray (NR) Katie Taylor (KT) Angela Tilley (AT) Ian Waterfield (IW) Frank Hanson (FH) Darryl Dixon (DD) – present after Performance Insight session <b>LU/LP</b> Andy York (AY) Tulip Tania Cummins (TC) Acorn Group Sue Johns (SJ) Butters Group David Camp (DC) Alliance HR/ALP Joanne Young (JY) GI Group Jane Bladon (JB) Staffline Sian Thomas (STH) FPC John Hardman (JH) HOPS Labour Solutions Shayne Tyler (ST) Manor Fresh Lorna Bramwell (LB) Staffing Group Jonathan Mason (JM) AG Thames Group Lee Osborne (LO) NFU Richard Fletcher (RF) Freshtime		
<b>Apologies</b>	<b>GLAA</b> Neil Court <b>LP/LU Liaison Group</b> Colin Hall David Seagust Philip Campbell Sharon Cross Stephanie Maurel Terry Waite Sharon McLoughlin Estera Amesz Graeme Sutton Daniel Sandhu Julie Giles		

1	<p><b>Welcome and introductions</b></p> <p>Marshall Evans (Chair) welcomed attendees.</p>
1a)	<p><b>Apologies</b> See above</p>
2	<p><b>Declarations of Interest</b></p> <p>Marshall Evans, Joanne Young</p>
3	<p><b>Minutes of the previous meetings</b></p> <p>Minutes of the meeting from joint LU/LP Liaison and Worker/NGO Liaison Group meeting held on 7 September 2017 were agreed.</p>
4	<p><b>Review of outstanding actions from previous minutes</b></p> <ol style="list-style-type: none"> <li>1. Review LP/ LU Best Practise guidance to incorporate move to GLAA – <b>CLOSED</b></li> <li>2. To investigate Romanian Labour Inspectorate requirements re LU agreements – Update provided with email response circulated prior to meeting – <b>CLOSED</b></li> <li>3. Website to be updated with Freedom of Information cases, Parliamentary questions and details of Compliance Inspections – New Policy Officer (FH) has joined GLAA, will close down action point by end of November as FOIs will be made public. – <b>ACTION POINT 1</b> Modern Slavery helpline statistics – UPDATE – NR confirmed GLAA is receiving referrals – <b>CLOSED</b></li> <li>4. Threat Assessment – more detail in threat assessment finalised in December and to be circulated in the New Year. Separate public-facing document to be created –will show risks to UK sectors and Intel cases. DC advised that NCA had recently stated that the Government estimate of 10,000 – 13,000 held in modern slavery is the tip of the iceberg. IW is of the opinion GLAA must expand operational activity out of the traditional sectors and into less well-known areas - <b>IW – ACTION POINT 2</b></li> <li>5. Formal request to National Referral Mechanism (NRM) to show breakdown in sectors in NRM report – <b>CLOSED</b></li> </ol>

	<p>6. Licensing Standards: The Standards will change and these changes are currently being discussed with the Home Office. There won't be any legislative change until 2019 because of the busy Parliamentary timetable. It is anticipated that the GLAA will commence informal consultation with stakeholders in January 2018. The GLAA will arrange a series of consultation events in the new year – <b>CW/NR ACTION POINT 3</b></p> <p>7. Arrange next joint LP/LU Worker /NGO Liaison Groups meeting in March 2018. – CLOSED – Date agreed 28 February 2017. – MB advised GLAA is currently looking at the format of the next meeting. There was the possibility of including a workshop type event. Asked for suggestions from the group for content of meeting. One idea had been to discuss recruitment fees and to this end, a joint Task and Finish group to examine this topic was being set up. – <b>KT - UPDATE: Task and Finish Workshops arranged for Jan and Feb 2018, invitations issued to LULP and ALP members. IN PROGRESS.</b></p> <p>8. PEOs (Professional Employer Organisations): HMRC are looking into businesses that employ workers and provide payroll. DD to meet with HMRC. DC has issued a 'cease and desist' solicitor's letter after being misquoted as endorsing such business models. LB mentioned having seen via email GLAA have accredited these practices – will liaise with NC – <b>ACTION POINT 4</b></p>
5	<p><b>Declarations of Urgent Business:</b></p> <p>No declarations of urgent business.</p>
6	<p><b>Update from Chief Executive – PB:</b></p> <p>Quarterly CEO report had been circulated prior to meeting.</p> <p>PB acknowledged it is the seventh month as the new GLAA. Priority focus is on triage process around urgent threats, risks and harm.</p> <p>Strong dialogue maintained with DLME, (Professor Sir David Metcalf), is very receptive to GLAA ideas – sees gap in enforcing labour standards in non-regulated sectors and limitations in GLAA's powers to fill the gap. GLAA was increasingly working with Police. DLME is due to complete his draft strategy before December, in order to publish in 2018. It is likely it may consider some issues that have been mentioned to the GLAA, such as an aggravated labour law offence, and consideration of whether licensing should be extended to other sectors, and if so what that would look like.</p> <p>GLAA Organisational Review – Recommendations to be a springboard to how we operate and make incremental change e.g. taking on textiles.</p>

	<p>Notable increase in quality of information on non-regulated sectors.</p> <p>Extended licenses – Matthew Taylor review – to be discussed in Parliament by end of year, the Group to let PB know any matters he can relay to MT – <b>ALL – ACTION POINT 5</b></p> <p>Defra IT platform – Planned switch over to HO at end of financial year.</p> <p>Staffing: 114 full time, 130 is projected target, will reach full allocation by financial year.</p> <p>Finance – we are hoping for the same funding as last year.</p> <p>Enforcement – enhanced in London area, aided by momentum from construction industry. To look at computer forensics next.</p> <p>Tier 1 Resolutions - had lessened, are now rising again, regulated sector is not diluted by any activity.</p>
7	<p><b>Compliance Update:</b></p> <p>Compliance Reports distributed to Group at meeting. Three main areas of non-compliance:</p> <ul style="list-style-type: none"> <li>• Bogus self-employment</li> <li>• Withholding of holiday pay/wages – “wage theft”, 28,000 victims</li> <li>• NMW</li> </ul> <p>Compliance reports could be circulated more widely as they contain useful information. KT to liaise with NC and let PB/DC know if it is a secure document – <b>IN PROGRESS - ACTION POINT 6</b></p>
8	<p><b>Performance and Insight Update:</b></p> <p>IW reported that GLAA now had a new format performance pack with increased narrative focus with case studies, emerging themes and areas. There would be less focus on measuring tasks and more on GLAA effectiveness.</p> <p>Quality of reporting has increased. GLAA must look at how it reacts to and prioritises incoming intel.</p> <p>IW noted new approach will be backed by detail, thereby building the bigger picture around risk areas.</p> <p>IW working on identifying nationality of victims of illegal labour. A detailed breakdown will be presented at next meeting in February 2018.</p>
9	<p><b>Intelligence:</b></p> <p>From 1 April – 31 October 2017 – widespread indicators of GLAA work:</p> <ul style="list-style-type: none"> <li>• 86 Licence applications</li> <li>• 78 compliance investigations (2 refused, 1 revoked)</li> <li>• 114 staff</li> </ul>

	<ul style="list-style-type: none"> <li>• 54 arrests – increase in criminal prosecutions</li> <li>• 5 completed court proceedings</li> <li>• 3 cases still in court</li> <li>• 48 joint investigations with other agencies</li> <li>• 53 cases led by GLAA – a significant figure, 83 currently with partners, 35 outside a previously regulated sector (warehousing, hospitality, domestic servitude).</li> <li>• £151,000 of wages/holiday pay withheld – particularly prevalent with leavers.</li> <li>• 38 victims into NRM</li> <li>• 39 did not wish to engage, but GLAA forced referral</li> </ul> <p>In answer to a question from JH, GLAA confirmed that six of the 86 new licenses were overseas.</p> <p>JY noted missing link between proportion of value with intel and outcomes. Suggested funnel graph to demonstrate. IW to present the visual at next meeting (28/02/18). All feedback welcome – <b>ACTION POINT 7</b></p> <p>IW advised that the Operational teams had been organised into four geographical locations. He hoped this will also improve relationships with local law enforcement agencies.</p>
	<p><b>Generalised Intelligence Sharing:</b></p> <p>Labour shortage – Derbyshire Police had reported an increase in illegal Eritreans, Vietnamese and Albanians. GLAA would be working with them. DC mentioned that, in the last three months, 70% of labour providers have been unable to supply all their clients’ labour requirements. There do not appear to be any official figures regarding illegal workers currently in the UK.</p> <p>NFU expressed concerns over non-holographic Romanian ID cards going unchecked, also seeing reappearance of student visas. IW noted industrial scale of forged documents, which serves to support increased labour exploitation. Government online verification system is not yet live.</p> <p>Other labour issues include: Croatian workers being told they need Visas to work in the UK are EU, four Cambridgeshire farms’ lack of immediate availability of workers for harvesting causing farmers to turn to illegal/exploited workers. One person showing papers, then a different worker turns up to do the work. Sub-contracting and third-party referrals – further down the food chain of LP. Daffodil grower charging labourers a fee to work in UK. - PB/IW to investigate – <b>ACTION POINT 8</b>. ME was surprised at labour shortage not being widely reported, suggesting it will be when the problem hits a major brand name.</p> <p>Peripatetic labour from overseas is leading to a fractured market with poor people verification. Overseas offices cannot be audited by GLAA. Currently over 50 licence holding overseas LPs.</p>

	<p>Positives: More workers reporting the signs, improving intel for GLAA, increased client engagement, wishing to implement checks, extended remit of GLAA. PB/MB met with Victoria Atkins, MP Louth &amp; Horncastle, the new Home Office Minister responsible, inter alia, for GLAA (her predecessor was Sarah Newton).</p>
<b>10</b>	<p><b>Items for Discussion:</b></p>
<b>10.1</b>	<p>Eliminating Recruitment Fees in Supply chains – New toolkit: PB expressed his thanks to DC for his paper – the catalyst for this project. In NGO/LULP Chair to ask Group who wishes to be part of Task Force let FH know, date will be finalised at a convenient location. DC to extend invitation to ALP members – <b>ACTION POINT 9</b></p>
<b>10.2</b>	<p>Update on Brief 54: Third Party Packaging: Review how we revise exclusions especially supply of labour. GLAA Task Force to approve exclusions with list on website for transparency. Exclusion requirements: exemption document and GLAA letter. DD suggested circulating links to businesses re: business impact test. STH to roll out questionnaire after NR spoken with Comms Team – <b>ACTION POINT 10</b></p> <p>PB suggests pragmatic approach if negative feedback received.</p> <p>FH to send email asking for information on impact assessment, need to know practicalities of ease of obtaining information/exemption/timescales, business size and scale – <b>ALL – ACTION POINT 11</b></p>
<b>10.3</b>	<p><b>Any other Business:</b></p>
<b>10.3.1</b>	<p>Supermarkets protocol: The draft Best Practice Guide sets out how those with concerns can report the issue while maintaining confidentiality. Comments to NC, whether to stay within Group.</p>
<b>10.3.2</b>	<p>NR/DD in process of redeveloping new licensing system. At present, GLAA issue paper licenses, but, going forward, “digital by default” is Government approach. Did this create a problem? Active checks provides an online tool to verify who has a licence. Group to give views on removing hard copy – <b>ALL – ACTION POINT 12</b></p> <p>Caravan guidance online survey – STH to receive feedback – <b>ACTION POINT 13</b></p> <p>MB mentioned we still need users to test new licensing system – how user friendly is it? Beta version will be made public. ALL to feed data in. DD to pass to Adam Stokes or KT via minutes – <b>ALL – ACTION POINT 14</b></p>

Annex A

<b>11</b>	<b>Date of next meeting:</b> 28 February, Nottingham.
-----------	---