



Gangmasters &
Labour Abuse Authority

GLAA Business Plan 23-24

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Foreword



Elysia McCaffrey

Chief Executive Officer



Julia Mulligan

GLAA Chair

This business plan covers year one of our new strategy and sets out the key deliverables we must achieve to help us implement it successfully.

Elysia came into post in June 2021 and Julia in November of that year. Since then, we have celebrated some excellent results, but also identified the need to refocus on our core purpose and improve performance in some important areas of business.

As a result, the organisation is going through a period of substantial change, including developing a new target operating model, upgrading core systems, and reshaping how we are led and governed.

Our core purpose is to regulate high-risk sectors where exploitation can occur. Over the coming year we will focus on developing and improving our work as a regulator. Key goals include to improve the timeliness of licensing decisions and compliance inspections. In addition, we are developing a new approach to identify and address high-risk licence holders. This work will be supported by our enforcement teams, to ensure we are as effective as possible in the areas we can make the biggest difference – based on evidence.

A critical part of our development is to implement our new target operating model. It brings important changes to the way we work and is designed to maximise our capacity and capability so that we can be as effective and efficient as possible.

Consequently, achieving our targets and outcomes this year will be fundamental to being able to deliver our strategy in years two and three. We are building solid foundations for our organisation to flourish and fulfil our mission to stop the exploitation of workers in the UK and to ensure employers treat them fairly.

Finally, we cannot do this work without the support of our people and partners. We would like to thank them for their forbearance, support and commitment to the work of the GLAA as we navigate this period of significant change.

Executive Summary

This business plan outlines our goals for the 2023-24 financial year. This is the first year working towards delivering our new three-year strategy. Our first priority is to implement a new operating model following an extensive review of the organisation, which took place last financial year.

The new operating model will transform the way we work, improve our future effectiveness and develop our organisational culture. A key aspect of this will focus on our core capabilities, capacity and how we need to resource our work in line with our strategic goals. This work will help us be a more effective and efficient organisation that delivers its goals.

The evidence base informing our strategy showed that we need to refocus, improve and enhance our work as a regulator. Specifically, we need to improve our productivity, timeliness, and the robustness of our regulation. This business plan centres on implementing change in the organisation this year, to ensure we are in the best possible place to achieve our goals.

Our Mission

Our **mission** is to stop the exploitation of workers in the UK and to ensure employers treat them fairly.

Who we are

On 5 February 2004, 21 people drowned picking cockles in Morecambe Bay. They had been trafficked into the country illegally and hired out to gather shellfish by local criminal gangs.

The Gangmasters Licensing Authority was set up in the aftermath of this tragedy to regulate people and companies supplying workers to the food industry, and to prevent anything similar from happening again.

This original purpose remains fundamental and continues to drive our operations today, as we strive to protect vulnerable workers.

In 2016, Parliament expanded our remit and changed our name. We were granted police-like enforcement powers to deal with serious worker exploitation, including modern-day slavery.

As the Gangmasters and Labour Abuse Authority (GLAA), our work has three principal strands:

- we are a regulator
- we prevent worker abuse
- we investigate the exploitation of people for their labour.

To fulfil our mission, we have close partnerships with a wide range of agencies, including the National Minimum Wage Team at His Majesty's Revenue and Customs (HMRC), the Employment Agency Standards Inspectorate (EAS) and UK law enforcement, including the National Crime Agency (NCA).

The Director of Labour Market Enforcement (DLME) also sets strategic priorities for labour market enforcement bodies, which informs our own strategic direction.

We are operationally independent of government as an Arm's Length Body of the Home Office, held to account by a board of independent Non-executive Directors and Chair. The Board sets and oversees the delivery of our business plan and strategy, our performance and governance. The GLAA is led by our Chief Executive Officer and Senior Leadership Team. We have 116 colleagues, working in teams around the UK with headquarters in Nottingham.

What we do

The GLAA ensures that workers in the UK are treated fairly, and that worker exploitation is stopped.

We have three core functions:

- **Regulation** - We regulate businesses that provide workers to the horticulture and fresh produce industry. Anyone wanting to supply workers to these markets must have a GLAA licence to operate. Our regulated sectors are agriculture, horticulture, shellfish gathering, food and food packaging and processing. It is a criminal offence to supply workers without a GLAA licence or use an unlicensed labour provider. Our regulatory work includes operating a licensing scheme, undertaking inspections to ensure compliance with that scheme, and taking enforcement action where there are breaches.
- **Prevention** – Our prevention work is an important part of our plan to stop worker exploitation in the UK. We currently work with a broad range of stakeholders locally, nationally, and internationally to help prevent workers from being exploited. Partners include other government agencies, but also a network of specialist charities and non-governmental organisations (NGOs). Prevention is also embedded into our enforcement work as we disrupt criminal activities and intervene in situations where workers may be at risk of abuse. Our prevention activities are diverse and extend beyond our regulated sectors, as we work in other high-risk sectors that rely on a temporary, low paid and often migrant workforce.
- **Enforcement** - We investigate allegations of worker abuse under the Modern Slavery Act 2015. GLAA Officers can conduct civil and criminal investigations and take enforcement action, including prosecutions and court orders to disrupt criminal activity. We also support victims who have been abused, in particular by ensuring they can access specialist help from our partners. We do not have modern slavery enforcement powers in Northern Ireland and Scotland, this work remains with the Police in those areas, but our regulation scheme operates UK-

wide. We have fostered close working relationships with our enforcement partners across the whole of the UK where we are able to jointly visit locations and make the best use of the powers that we collectively have, to disrupt and deter criminal activity.

Our Values

Our values underpin everything we do. They were developed in collaboration with GLAA colleagues and set the culture and behaviours we expect from each other. We expect our people to champion these values both internally and with external stakeholders.

- **Integrity** - We are honest, trustworthy and responsible.
- **Respect** - We are a friendly and inclusive team who openly help each other and understand we are working towards the same goal.
- **Teamwork** - We work in collaboration to achieve common goals efficiently and effectively.
- **Professionalism** - We work productively with passion and pride to achieve the goals of the GLAA.
- **Commitment** - We are engaged with the aims of the GLAA and dedicated to protecting vulnerable workers.

Our Strategy and Planning

We have a new three-year strategy covering the period from 2023-2026. It is the result of a re-appraisal of our work, with an increased focus on our statutory functions and core remit, prioritising in the areas in which we can have the most impact. It builds on our past, but also offers a clear direction for the future.

Our strategy has three goals:

- Be a robust and effective regulator.
- Be known as experts in addressing worker abuse and exploitation.
- Be an essential enforcement partner.

We also have several key deliverables to ensure our people and resources are effectively managed to deliver our strategy.

This is the first of three annual business plans which sit underneath that strategy, focusing on delivering vital change for a more effective and efficient organisation. Under each of our strategic goals, the business plan identifies key deliverables that must happen this year to ensure we are in a position to deliver our strategy over the following years. We have also identified key objectives for our people and resources.

The targets in this business plan will help inform our targets for subsequent business plans in years two and three.

Strategic Goal 1: Be a robust and effective regulator

This business plan focuses on reprioritising our efforts to improve and enhance our work as a regulator. It includes streamlining our processes to ensure they are as efficient and effective as possible, ensuring our teams have capacity and embedding new ways of working. We have also reviewed our intelligence and tasking functions and will need to ensure changes are embedded across the organisation.

As a result of this work, we expect to see licensing decisions made more quickly, an ability to expedite applications that fall outside our target timeframe where appropriate and that our efforts are focused on higher risk businesses. This step change in the way we operate as a regulator will take time to embed this year. This will create opportunities for us in years two and three of the strategy, to identify opportunities for continuous improvement, increased engagement with the regulated sector and further reduce the time taken to make licensing decisions.

Over the next three years we want to see a clear trend in the improving the time taken to complete regulation activity. We also want to increase our inspection activity of licence holders deemed high-risk. We will achieve this by ensuring all licence holders are appropriately risk assessed. Whilst all allegations of serious non-compliance against our critical licensing standards are considered, not all are assessed as requiring an inspection. This year, we will be even more proactive and focused on licence holders who do require inspection and will ensure to increase the volume of inspections we carry out.

How we will deliver this in 2023-24:

Deliverables	Key activities	Milestones	Outcomes	How we will measure delivery
Speed up the licence application process	<ul style="list-style-type: none"> Review and update the criteria against on how we decide whether an application inspection is required as part of the application process. Implement the refreshed policy and changes to the associated ways of working. Enhance the systems used to minimise duplication and manual activity. Implement the structural change recommendations from the new operating model project. This will result in changes to roles and responsibilities and ways of working. 	<p>September 2023</p> <p>January 2024</p> <p>January 2024</p> <p>January 2024</p>	<p>Increased efficiency across our regulatory work.</p> <p>Improved decision-making times.</p> <p>A change to the way we work will lead to faster application inspections.</p>	<ul style="list-style-type: none"> Median time taken to make a licensing decision for a GLAA licence application improves from 225 to 125 working days.
Introduce a risk-based approach to improve how we prioritise our regulation activity	<ul style="list-style-type: none"> Introduce a more formalised process to determine the type of regulation activity required based on the level of risk. Embed the new process and the associated ways of working and governance changes in the Organisation. 	<p>October 2023</p> <p>January 2024</p>	<p>We focus our efforts on high-risk businesses, meaning risk or non-compliant practices are uncovered.</p>	<ul style="list-style-type: none"> 100 per cent of licence holders will be internally risk assessed. Increase inspection activity of licence holders assessed as high-risk from 11 to 30 per cent.¹

¹ Whilst all allegations of serious non-compliance against our critical licensing standards are considered, not all are assessed as requiring an inspection.

Strategic Goal 2: Be known as experts in addressing worker abuse and exploitation

The GLAA’s mission is to stop worker exploitation. To work towards this, our focus in this year’s business plan will be on enhancing our own understanding of current and future trends and threats to ensure our operations are prioritised. We will continue to work closely with key partners to protect workers and prevent exploitation. The implementation of new ways of working and investment in our capabilities will enable us to work more strategically in years two and three of the strategy. This includes being able to influence policy and practice through our analysis and evidence.

Thus, over the next three years we will be in a better position to drive strategic partnerships, inform policy on worker abuse and exploitation and shape the collective knowledge in this area.

How we will deliver this in 2023-24:

Deliverables	Key activities	Milestones	Outcomes	How we will measure delivery
Further develop and invest in our analytical and intelligence functions	<ul style="list-style-type: none"> Deliver an improved intelligence and case management system. Publish the Strategic Threat Assessment and Control Strategy. Improve training and capability in our intelligence and analytical teams. 	<p>February 2024</p> <p>September 2023</p> <p>March 2024</p>	To be an intelligence-led organisation.	<ul style="list-style-type: none"> The information we record which results an investigation increases from 25 to 30 per cent.²
Use analysis and intelligence to underpin our strategic and operational decision making	<ul style="list-style-type: none"> Develop quality analytical products in line with our Control Strategy priorities and use these to inform both operational activity as well as strategic communications, campaigns, policy development 	March 2024	To improve how we use information to stop worker exploitation.	<ul style="list-style-type: none"> Change in risk scoring for our priority areas as defined by our Control Strategy –to be monitored in 2023-24.

² The GLAA is an intelligence-led organisation and has been working to improve the quality and relevance of the information we receive. Through this work we expect to see a rise in the investigations we undertake.

Deliverables	Key activities	Milestones	Outcomes	How we will measure delivery
	and building partnerships. <ul style="list-style-type: none"> Embed a new internal governance framework and ways of working. 	October 2023		
Review the way we support workers	<ul style="list-style-type: none"> Develop the Victim Navigator project. Carry out and embed lessons learnt. 	<p>March 2024</p> <p>March 2024</p>	To understand the victim experience and improve consistency, efficiency and effectiveness of how we support workers.	<ul style="list-style-type: none"> All eligible victims are referred into the National Referral Mechanism (NRM) – including duty to notify.

Strategic Goal 3: Be an essential enforcement partner

The complexity of our work and its overlapping nature with other agencies puts partnership working at the heart of our enforcement activities. The GLAA has a national remit and a relatively small number of operational resources to deliver against that remit. In our first year’s business plan, we will focus on ensuring our expertise, skills, experience and delegated powers are used effectively to protect exploited workers. This will set us up for years two and three to work more effectively with partners on co-ordinated operational activity.

How we will deliver this in 2023-24:

Deliverables	Key activities	Milestone	Outcomes	How we will measure delivery
Develop a partnership plan, which defines our approach to partnership working.	<ul style="list-style-type: none"> Formally define and agree who our strategic partners are. Understand how we can better work in partnership to stop worker exploitation. 	<p>February 2024</p> <p>March 2024</p>	The GLAA is a key partner in stopping worker exploitation.	<ul style="list-style-type: none"> GLAA led investigations, which result in a criminal or civil disruption order³ increase from 17 to 22 per cent.

³Criminal and civil disruption orders include prosecutions, warnings/enforcement notices, Labour Market Enforcement Undertakings/Orders, Slavery and Trafficking Risk Orders/Slavery and Trafficking Prevention Orders, licence refusals, licence revocations, licence suspensions and Additional Licensing Conditions.

Deliverables	Key activities	Milestone	Outcomes	How we will measure delivery
Further embed our Control Strategy priorities ⁴ within the GLAA	<ul style="list-style-type: none"> Review the Control Strategy. Review the delivery of the tasking process. Review the effectiveness of the Control Strategy. 	September 2023 November 2023 February 2024	We are focusing our efforts on the areas of highest risk defined through our Control Strategy.	<ul style="list-style-type: none"> Investigations conducted which relate to our Control Strategy priorities increase above 50 per cent.
Evaluate the impact of our disruption and enforcement activities	<ul style="list-style-type: none"> Review our approach to disruption reporting Deliver lessons learnt from operational activity Victim Navigator Evaluation 	November 2023 March 2024 March 2024	Have a good understanding of the impact of our enforcement outcomes.	<ul style="list-style-type: none"> Four lessons learnt are completed this year.

Our People and Resources

Our people and resources are key to delivering the goals of the GLAA. We are committed to investing in our colleagues, improving our diversity and inclusion, and changing our organisational culture to be able to fully deliver for the people we exist to protect. This year a key focus will be reshaping our teams to create our new operating model and improving our ways of working to increase efficiency and effectiveness. We expect this work to take the full year to deliver, but it will create the foundation for years two and three, as well as ready us for our Public Body review next year.

How we will deliver this in 2023-24:

Deliverables	Key activities	Milestone	Outcomes	How we will measure delivery
Deliver the people transformation as	<ul style="list-style-type: none"> Deliver our operating model 	January 2024	Our organisation is set up to deliver our strategic goals.	<ul style="list-style-type: none"> Colleagues report their overall satisfaction

⁴ Our Control Strategy identifies four specific priorities that will dictate our operational and prevention activity. These are based on our strategic threat assessment and are subject to change as the profile and our understanding of the exploitation of workers develops.

Deliverables	Key activities	Milestone	Outcomes	How we will measure delivery
part of our new operating model	<ul style="list-style-type: none"> implementation plan. Embed a new governance model. 	December 2023		through our 2023-24 People Survey.
Deliver IT improvements to improve efficiency, effectiveness, and productivity	<ul style="list-style-type: none"> Delivery of an improved intelligence and case management system. Enhance our licensing system Identify opportunities to digitalise our processes Improve our use of data to operate more effectively 	<p>February 2024</p> <p>January 2024</p> <p>February 2024</p> <p>January 2024</p>	We are an efficient and effective organisation, which is modernising the way we work.	<ul style="list-style-type: none"> IT systems are delivered that save time on key internal processes.
Develop and embed a diversity and inclusion (D&I) strategy	<ul style="list-style-type: none"> Develop D&I strategy Leadership alignment on D&I future vision and ambition Communicate D&I future vision and ambition organisation wide. 	<p>October 2023</p> <p>January 2024</p> <p>December 2023</p>	This will provide a clear strategic vision and direction for the future of D&I within the GLAA and demonstrate our commitment to D&I.	<ul style="list-style-type: none"> Colleagues who report being from a minority ethnic background (as a percentage of the total workforce) increase from 6 to 10 per cent.
GLAA values are relaunched and embedded across the organisation	<ul style="list-style-type: none"> Link values to the strategy launch Communicate values, updated ways of working and desired leadership behaviours Introduce a values award to recognise colleagues that have been 	<p>April 2023</p> <p>December 2023</p> <p>August 2023</p>	This will increase alignment across the organisation and ensure our values are embedded within the culture and role-modelled at all levels of the organisation.	<ul style="list-style-type: none"> Colleagues who report that 'the GLAA values resonate with me' increases from 4.3 to 4.5 (out of 5).

Deliverables	Key activities	Milestone	Outcomes	How we will measure delivery
	living the GLAA values.			
Develop a structured programme of professional development opportunities	<ul style="list-style-type: none"> Develop a skills matrix for each role/team. Training needs analysis per role/team. Resource to identify and deliver training secured. Suitable training beginning to be identified. 	<p>December 2023</p> <p>July 2023</p> <p>September 2023</p> <p>November 2023 onwards</p>	This will provide a clear skills matrix and appropriate training per team/role, so colleagues are supported in a culture of continuous learning.	<ul style="list-style-type: none"> 100% of Professional Development Plans (PDP) are completed. All colleagues have five days of learning and development (including mandatory learning).

Budget

The GLAA has a total budget of £7.1m. We generate £1.2m in income from our licensing activities with the remaining £5.9m coming from taxpayers via our sponsoring department, the Home Office. In addition, this year we have received an extra £1m to support the transition to our new operating model.

As well as revenue, the GLAA received capital funding of £650,000 to address key risks and opportunities related to our intelligence and case management systems, the website and licensing system.

For several years, we have had a ‘flat cash’ settlement which has helped protect us from reductions during the current Spending Review. Going forward, we anticipate that this will end, and our funding will be reduced in 2024-25 by at least five per cent. This would result in a reduction to around £5.8m, excluding income from licence fees.

To address our budget challenges the GLAA has instigated a new Management Board which will oversee the performance and delivery of key transformation projects like the target operating model to ensure that our service is efficient, effective and affordable. In 2023-24, our Board will also consider a review of our licence fees in line with the requirements contained with Managing Public Money.

Risk

The organisation sets its risk appetite across the range of our functions, which is agreed by the GLAA Board. The GLAA recognises that in pursuit of its goals, strategic priorities and outcomes that it may choose to accept different degrees of risk in different areas.

The GLAA has established and articulated risk appetite for the differing areas of its business. Where the GLAA chooses to accept an increased level of risk it will do so, subject always to ensuring that the potential benefits and threats are fully understood before

actions are authorised, that it has sufficient risk capacity, and that sensible and proportionate measures to mitigate risk are established.

Measuring our Impact

Achievement of this business plan is the collective responsibility of our Senior Leadership Team. Performance against the plan along with strategic key performance indicators will be continuously monitored and reported at Board meetings. In addition, the Minister holds us to account to ensure we are delivering an efficient and effective service.

Progress will be measure against:

Key Performance Indicators	2022-23 Baseline	Target
Goal 1: Be a robust and effective regulator		
Median time taken to make a licensing decision on a new GLAA licence application.	225 working days	125 working days
Increase inspection activity of licence holders assessed as high-risk.	11 per cent	30 per cent
Goal 2: Be known as experts in addressing worker abuse and exploitation		
Information recorded which results in an investigation.	25 per cent	30 per cent
All eligible victims are referred into the National Referral Mechanism (NRM) – including duty to notify for those who are eligible.	237 eligible people referred	N/A
Goal 3: Be an essential enforcement partner		
GLAA led investigations which result in a criminal or civil disruption order.	17 per cent	22 per cent
Investigations that relate to Control Strategy priorities.	50 per cent ⁵	Above 50 per cent
Goal 4: Our People and Resources		
Colleagues who report being from a minority ethnic background (as a percentage of the total workforce).	6 per cent	10 per cent
Colleagues who report having a real sense of belonging at the GLAA (out of 5).	3.2	3.5
Deliver the service within 1 per cent of the overall budget.	-1 per cent	Within 1 per cent of the budget

⁵ The Control Strategy was introduced in November 2022. Therefore, this figure does not represent a full year of investigations and would not give a reflective benchmark for a target in 2023-24.

More information

Contact us to find out more about our work or to request this plan in an alternative format.

www.gla.gov.uk

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