

GLAA Business Plan 2024-25

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Foreword





Elysia McCaffrey, Chief Executive Officer

Julia Mulligan, GLAA Chair

The past year has been one of transformation and change. We are now a very different organisation, to the one that began the year, having implemented phase one of our new Target Operating Model (TOM).

This major change programme has delivered some significant results:

- More than halving the time taken to issue a gangmaster licence, which has reduced by 56 per cent in comparison to 2022-23.
- Completing risk assessments on 100 percent of our licence holders to better understand which workers are at greatest risk of exploitation.
- Increasing the number of businesses inspected for compliance with their licences by over 200 per cent.
- Rationalising and streamlining our leadership from nine posts to four.
- Creating savings in our annual revenue budget, increasing our efficiency and providing better value for the taxpayer.
- Improving our culture, behaviours and staff satisfaction, evidenced by increases across all key metrics in our staff survey.

The commitment and dedication from our colleagues in helping to achieve these results has been impressive. Through the TOM, we have driven forwards extensive changes in leadership and culture, our structure, processes, governance and decision-making. To help us measure progress, we have a suite of new and stretching Key Performance Indicators (KPIs).

An area of significant challenge was the performance of our regulatory functions. We have reviewed and changed the ways in which the team works and introduced a new risk management system to identify those licence holders of greatest concern. In addition, we have reprioritised investigations and inspections to focus more sharply on protecting workers at higher risk of exploitation.

We now understand the levers we have to drive forward performance and measure progress. These include improvements to data so we can make more informed, evidence-based decisions, as well as monitor progress through new governance and performance frameworks.

In particular, we have a new leadership team, and have merged operations to reduce silos and create more coherent and agile teams. This has led to significant improvements in our culture, evidenced by our most recent people survey results. We are very proud of what we have achieved and are excited to build on our successes and continue transformation in this coming year.

However, we also face continued challenges, which risk limiting our ambition and the delivery of our plan. We are a small organisation of approximately 120 people, with a huge remit and no discretionary expenditure. Having delivered significant efficiencies through the TOM, finding a further five per cent via the anticipated Public Bodies Review (PBR) could risk undermining the progress we have made, and how we are able to protect vulnerable victims of exploitation.

In addition, the nature of worker exploitation is changing. We are seeing new ways in which vulnerable people are being exploited, for example in the adult social care sector where over the past year, we saw a 400 per cent increase in referrals. We need to be ready and able to respond.

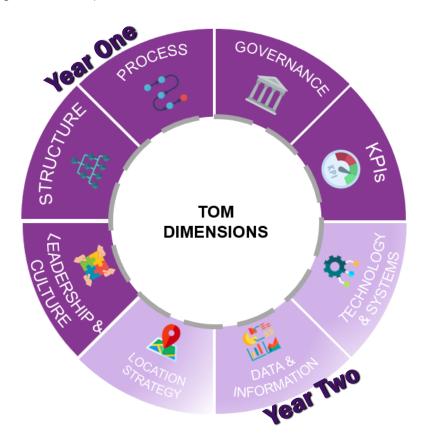
This new business plan builds on the successes of the first year of our strategy. It will also help us respond to our challenges, so that we are in the best position possible to deliver on our mission to stop the exploitation of workers across the UK.

Introduction

This 2024-2025 business plan sets out our work for year two of our three-year corporate strategy.

In the first year, we completed phase one of reshaping and restructuring our organisation through designing and implementing a new Target Operating Model (TOM – see figure 1 below).

Figure 1:



Our achievements in year one gave us an excellent foundation, and we are now focused on consolidating the progress made. In year two, we will continue our transformation, focusing on the remaining three parts of the TOM, which include:

- 1. Reviewing our locations, premises, and working practices
- 2. Improving data and information
- 3. Upgrading technology and systems.

To further improve on our leadership and culture processes through the delivery of a continuous improvement model, rooted in performance transparency, knowledge sharing between departments and employee involvement and feedback through the People Survey.

Our Mission

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

Our Strategy

The GLAA's three-year strategy covers 2023-2026. It was the result of a re-appraisal of our work, with an increased focus on our statutory functions and core remit, prioritising 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 Strategic Goals

Our strategy has three strategic goals which will focus and direct our work over the coming year. To measure our progress, we have developed a set of KPIs, which will be reviewed every year to drive our performance. Our Board will oversee our progress, hold us to account for delivery and we will report on our achievements in our Annual Report and Accounts which is laid in Parliament.

Our three strategic goals are:

Goal 1: Be a robust and effective regulator.

Regulation is our core business, and we will ensure it is resourced appropriately and operates effectively.

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

We will use our analytical and intelligence capabilities to influence policy and practice, develop and expand our prevention activities and ensure we can properly direct and prioritise our work.

Goal 3: Be an essential enforcement partner.

We will prioritise our enforcement operations through our strategic risk assessment, and work in collaboration with partners to tackle serious worker exploitation and abuse in line with those priorities.

Alongside our three strategic goals outlined above, we also have several key deliverables outlined in pages 20-22 of this plan to ensure our people and resources are effectively managed to deliver our strategy.

2024-25: Building on Change

In 2023-24, year one of the strategy, we dealt with significant issues that were having a negative impact on our performance. We did this by **transforming** the organisation. The successes we have achieved have created an excellent platform for us to **build** on that progress in this business plan year and will help us to **thrive** in 2025-26.

Resources, Challenges and Risks

Despite the excellent work delivered in year one, our resources and capacity remain a risk to maintaining our positive performance and progression.

Our workforce stands at around 120 people. We have a national remit and are responsible for complex operations working with many different partners. Our success is highly dependent on this collaborative working which is also impacted by labour exploitation and modern slavery policies from the UK government.

Our financial envelope is limited and further reductions in funding, or unexpected financial pressures, will impact the delivery of this plan, the provision of victim support, and disruption of criminal activity. In such a scenario, we would need to make decisions on which statutory functions to prioritise, which will impact our ability to protect workers and victims of labour exploitation, placing them at greater risk.

In addition, our small size means we have limited resources to invest in IT solutions to improve efficiency and effectiveness creating cost pressures and hindering our ability to harness-innovative technological solutions.

Strategic Goal 1: Be a robust and effective regulator

In year one, our business plan focused on reprioritising our efforts to improve and enhance our work as a regulator by streamlining our processes and embedding new ways of working.

We were able to more than halve the time taken to issue a licence, which allowed us to inspect more businesses for their compliance with their licences. This was achieved by freeing up resource from applications and moving it into inspections. In turn, inspections were targeted on higher risk businesses.

As a result, we now have a well-established set of processes and principles on which to build, to ensure we can arrest, investigate, and sanction those who exploit workers.

In the coming year, we will further reduce the time taken to make licensing decisions and increase the number of compliance inspections. This will be helped by creating resilience in our workforce through embedding agile, multi-disciplinary teams that we can deploy where needed. Their work will be underpinned by new standards to ensure high quality and consistency in our regulation activity.

We also recognise the critical importance of our partners in stopping worker exploitation, and in the next year, we will develop those relationships further to increase the volume and quality of the intelligence we receive. This will be a cross-cutting theme supporting all our strategic goals.

How we will deliver our plan in 2024-25:

Objectives	Deliverables	Outcomes	Targets & Key Performance Indicators (KPIs)
Delivering a first-class service by further reducing the time it takes to make licensing decisions.	 Create specific and sustainable standards for each part of the application inspection (AI) process. Analyse demand to identify resource levels required to maintain a minimum, consistent and reliable service. 	Deliver a consistent, reliable, and quality service for licence holders. Identify delays in parts of the Al process sooner, so that they can be addressed in an agile manner.	 ✓ A median of 60 working days to make a licensing decision by March 2025. ✓ 6% of licence holders inspected each quarter by March 2025.
Increase the number of compliance inspections.	Develop an evidence- base to demonstrate the resources required for compliance inspection demand.	Increased disruption to non- compliant businesses and support for victims. Ability to understand what works to influence more effective outcomes for workers.	✓ A 10% increase in the number of investigations across Section 12 and Section 13¹ by March 2025.
Improve the skills and diversity of operational teams to improve	Create a pathway into the GLAA for new Compliance Officers.	Enhancing our operational intelligence and capability through widening our diverse	√ 33% increase in Compliance Officers attending PIP1 training by December 2024.

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¹ The Gangmasters (Licensing) Act 2004 introduced offences Section 12(1&2) and Section 13(1). Section 12(1) is to operate as an unlicensed gangmaster, Section 12(2) is to possess false documentation and Section 13(1) involves entering into arrangements with an unlicensed gangmaster.

investigations and provide tailored support to victims from many different cultures. •	 Operations Manual to be circulated to new starters for support. Compliance Officers to undertake the PIP1 training. Develop a leadership programme with career pathways. Junior Investigations Pathway being embedded. Leadership sessions on 'Building the Basics' and Culture. 	talent pool, supporting new starters, and upskilling future leaders. Improving our own internal understanding of how modern slavery can impact victims from a multitude of cultures, nationalities, and ethnicities. An improved leadership culture to continue to drive the change.		Improve the gender balance in the GLAA Operations function by 10% by March 2025.
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Strategic Goal 2: Be known as experts in addressing worker abuse and exploitation

Year one's business plan focused on improving our intelligence processes to enhance our understanding of worker exploitation and abuse, particularly in the most high-risk areas. Our improved performance demonstrates the strength of our new intelligence model and governance processes.

In year two, having put in place the right processes, we will focus on improving the quality and management of our data itself – how we collect, record and access the information and intelligence we receive. This will ensure we can deploy our operational teams in the most effective way and help us work better with partners, drawing on accurate, reliable evidence and intelligence.

We will be bolder in sharing our analysis on worker exploitation in the UK, driving the debate on relevant topics. We will work collaboratively with our enforcement partners and victim support charities and will share analytical products including our problem profiles and horizon scanning analysis. Working collaboratively in this way will ensure our work is shaped by the needs of workers and focussed on reducing the threat, risk and harm across our enforcement priority areas.

Our Communication and Stakeholder Engagement Plan will help us seek new ways to promote justice, fairness, and safety for workers through increased joint working with key partners.

In year three, we expect to be influential in shaping policy through collaborative and co-ordinated partnership working. How we will deliver our plan in 2024-25:

Objectives	Deliverables	Outcomes	Targets & Key Performance Indicators (KPIs)
Our data will enable us to accurately understand trends and changes in criminal activity, as well as the people being targeted and exploited.	 To recruit an Indexer/researcher role. Create consistent data standards for inputting information into our intelligence case management system. 	Recruitment of an indexer will allow for Analysts to focus on interpretating the data to discover useful information, inform conclusions and support decision-making. To be an intelligence-led organisation, which maximises its	√ 50% of internally generated intelligence is linked to a Control Strategy Priority by March 2025.

	 Streamline current sources of data into one 'single source of truth'. A data map of the technology requirements and data standards needed and a costed business case for iBase change requirements. Identify priorities for digitalisation and process automation. We will develop our narrative on Labour Exploitation in the UK and have a robust framework in place to engage effectively with our stakeholders. To have our data compliant with 'Management of Police Information (MoPi)' in regard to our intelligence system. 	own resources and technology to output accurate data and intelligence to support our expertise. Delivering intelligence-led investigations. Streamlining current data sources allows for efficient data analysis. With standardised data, the GLAA can perform in-depth analysis, identify correlations, trends, and insights leading to more informed decision making.	
We will increase our positive enforcement outcomes with better use of evidence-based policing.	 Operational Delivery demand profile review being in place. Evidence base established to meet the Application demand levels, compliance activity and Gangmasters (Licensing) Act investigations. 	Strengthening investigations by enhancing our evidence-based policing (EBP). Cases are more likely to be accepted by the Crown Prosecution Service (CPS), which will mean that victims are better	✓ 25% of GLAA led investigations which result in a criminal or civil disruption order by March 2025.

		supported at court with improved evidence-based policing and criminals are prosecuted sooner.	
Improve the reach and power of engagement to continually improve our strategic partnerships.	 Analysts to attend Security Industry Authority (SIA) workshop in April 2024 to improve our knowledge of Crimson automated data reporting. Use our communication channels to share analysis and information with partners to help reduce the threat to victims within our Control Strategy Priorities (CSPs). Analysts to agree a set of intelligence collection plans to publish onto our website and social media platforms. Implement the Communication and Stakeholder Engagement Plan. Build a costed business case for a new website and secure funding. Conduct a website user research report to be shared with potential suppliers. 	Building on partnership relationships and knowledge to utilise available resources. To use our online presence to promote our mission to stop worker exploitation. As an interim measure, improve the navigation, user experience and content on the current website to attract more visitors and expand our reach. Be in a position to go out to market for a new website. Our stakeholders will have greater insight and understanding of how to prevent labour exploitation and reduce the threat, risk and. harm in our priority areas	✓ An average of 6% engagement score across all social media channels by November 2024.

People will look to us for our insight and expertise on understanding and tackling worker exploitation.	 Develop key messages about our work and support of victims. Development of victim stories. Using the Victim Navigator to better improve the service to victims. Using quarterly reports on victim profiles to inform Operations and to develop user stories for website reporting. Creating a project implementation plan to assess how we can maximise the Victim Navigator Programme to meet the growing demand for victim support. A library of worker victim stories that is accessible to GLAA staff, to inform our engagement work. 	and victim stories to aid decision making. Improved intelligence and understanding of the nature and scale of threats to those vulnerable to labour exploitation. Greater access to data on the breadth of work we do to support victims, to ensure they remain central to our decision making.	✓ The delivery of two roundtables to engage key communities by December 2024.
Our call centre will be easy to access and able to		Consistent running of the call	
	KPIs to ensure operational	centre through enhanced	
provide the support people	effectiveness.	monitoring of our engagement with	
need.	Ensure the GLAA is publicising	the public.	
	the call centre when necessary.		

Enhancing online pathways to guide users to the call centre via the GLAA website.	Increasing our communication with the public by being an open and accessible enforcement body.
	An increase in the amount of actionable intelligence being received, leading to more inspections and enforcement.
	Ensuring that victims and witnesses can get in touch with the GLAA for support as effortlessly and efficiently as possible.

Strategic Goal 3: Be an essential enforcement partner

In year one, we reshaped the whole of the organisation to enable it to work more efficiently and improve performance. We dismantled our regional structure and merged operational teams to allow us to deploy resources much more effectively, and ensure teams were delivering against the threats we prioritised via our intelligence and assessments.

We are now confident our teams are focused on pursuing the highest risk criminals and gangs that exploit workers. We are trusted by our partners to lead high profile national investigations, such as Operation Aidant², a large-scale operation tackling worker abuse in the care sector.

In year two, we will work much more closely with the Regional Organised Crime Units (ROCUs) to ensure our expertise is fully harnessed in joint activities tackling the exploitation of workers by serious and organised crime groups (OCGs).

The lessons we learnt last year will help us evaluate the impact of the activities we undertake to disrupt criminal behaviour, as well as the effectiveness of our enforcement operations. Due to the dynamic nature of victim profiles and the impact of wider government policies, we will be considering how we can enhance our support of victims. This will set us up for year three, to work even more effectively with partners on co-ordinated operational activity.

How we will deliver our plan in 2024-25:

Objectives	Deliverables	Outcomes	Targets & Key Performance Indicators (KPIs)
To improve our joint working with policing, the National Crime Agency (NCA) and other critical operational agencies.	 Proactive engagement with key operational partners including the Regional Organised Crime Units (ROCUs). Build an effective governance structure to manage Organised Crime Groups (OCGs) and 	Partnership working between enforcement bodies and agencies will allow the GLAA to create reliable and trusting relationships and reduce the risk of modern slavery and human trafficking cases slipping through the safeguarding system.	✓ 25% of GLAA partnership investigations result in a criminal or civil disruption by March 2025.

² Operation Aidant is co-ordinated by the National Crime Agency (NCA). The operation is run nationally every year and involves local police forces working alongside partner agencies to focus on vulnerability, exploitation and modern slavery.

- sharing our knowledge with key partners.
- Engagement with partners on our operational methods – via "master class" methods.
- Agreed service-level agreement (SLA) with Justice and Care.
- Identify and engage with key strategic partners to reduce the growing threat of labour exploitation within the care sector.
- Engagement with the National Crime Agency (NCA) on improving the knowledge and understanding of online enablers of labour exploitation.
- Defining business technology requirements.
- Developing an external engagement strategy to review the impact of Artificial Intelligence on targeting vulnerabilities of people seeking work in the UK.
- Develop a strategic assessment on the impact of recruitment scams and online banking fraud.

Improvement of our overall intelligence picture by monitoring any OCG changes and informing key agencies.

Sharing of intel between partners to expand our knowledge on how Improved understanding of the emerging risk of online banking fraud and recruitment scams.

A better understanding of the technological requirements we need to have more interoperable systems.

Improved ability to identify and adapt to emerging criminal trends and technological advances.

	T		
Victims will be put first in	Drawing on lessons learnt,	Increased positive outcomes for	√ 95% of victims assigned
all our operational effort.	review the Control Strategy '4P'	victims from modern slavery and	to the victim navigator are
	plans and share learning	labour exploitation investigations.	engaged in our
	internally and with key partners.		investigative process
	 Embed the lessons learnt 	A collaborative approach to	March 2025.
	process into the Tactical Tasking	strategically reducing the threat, risk	
	and C-ordination Group	and harm of modern slavery and to	
	(TT&CG).	human trafficking victims.	
	Develop collaborative projects	_	
	with the National Crime Agency	Providing multi-agency care to	
	(NCA) and Jobs Aware as part of		
	our stakeholder engagement	safe and supportive work.	
	plan.	''	
We will continue to show	 Develop '4P' plans as part of 	Embed and co-ordinate prevention	✓ Four lessons learned
we are a learning	our strategic prevention plan.	in every aspect of our work.	completed by March 2025.
organisation.	Ensure 4P plans are		
	delivered in line with the	Enhanced ability to evaluate and	
	strategic prevention plan.	understand effective prevention	
	Agree methodology for	and disruption.	
	disruption reporting.	Lessons learned reporting fully	
	 Develop evaluation methods, 	embedded, to continuously improve	
	metrics and reporting for our	operational performance.	
	prevention and disruption	operational performance.	
	activities.		
	activities.		

Our people and resources are limited, and we must ensure they are fully and effectively deployed in order to deliver our goals. 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 are here to protect.

This year a key focus will be on launching our people strategy and improving our data quality. Our ability to manage our data and information is constrained by our current technology. Work is underway to deliver a new case management system subject to financial support. In the meantime, we must maximise our efficiency to be able to deliver our mission within our budget constraints.

This year we will be looking at our location strategy, which will include an office move. This will provide opportunities to look innovatively at how we use our office space to increase productivity and creativity. As part of this we will review our technology, however any changes will be reliant on the budget that we have. The location strategy will link closely with the people strategy to ensure we have the right people, in the right place to deliver the right results.

The GLAA will work with the government to fulfil our obligations under the principles of 'Managing Public Money' to implement a fee change and in the meantime, we will work with the Home Office on future proposals.

How we will deliver this in 2024-25:

Objectives	Deliverables	Outcomes	Targets & Key Performance Indicators (KPIs)
We will have empowering leaders.	 Deliver full compliance on Self-Reliance through Mutual Accountability Framework (SMAF). Leaders to support performance through end of year and midyear performance reviews. Celebrate the work of team members through the 'Star Rewards' programme online eCards and Instant Awards. 	Highly functional teams by ensuring management have the support, skills and tools to be self-assured and accountable leaders.	 ✓ Achieve a 5% increase in employee engagement through the completion of the People Survey by March 2025. ✓ Ensure staff retention rates remain 85% or higher by March 2025.

We will improve our diversity and inclusion.	 Introduce operational traineeship schemes to encourage and invest in early talent. Implement the Equality, Diversity and Inclusion (EDI) plan, including an EDI events calendar and EDI staff forum. Embedding accountability for EDI through leadership objectives and senior oversight. Roll out the Learning and Development Strategy through a programme of interactive events and open discussions. 	An ability to recruit and retain staff with diverse backgrounds, life experiences and cultures. A more diverse, culturally informed workforce enabling more effective inspections and appropriate support for victims from diverse cultural backgrounds.	 ✓ 10% of colleagues from minority ethnic backgrounds by March 2025. ✓ Improve the gender balance by 10% in the GLAA Operations function.
Embedding the principles of value for money throughout the organisation.	 Develop an Asset Management Plan that supports a mobile workforce and applies cost- effective management to asset inventory. Asset Management Plan to include a completed Asset Audit and remote working policy. Move to a more affordable office with technology requirements included. Update, refine and circulate Standard Operating Procedures and policies on commercial and financial processes to embed a 	Improving information management and digitally enabled ways of working. More affordable and flexible workspace. Improved personal productivity and a cultural understanding of financial and commercial processes within the GLAA.	✓ Deliver the service within 1% of the overall budget by March 2025.

culture of commercial	
awareness.	

Budget

The GLAA has a total budget of £7.1m. We currently generate £1.2m in fee income from our licensing activities with the remaining £5.9m coming from taxpayers via our sponsoring department, the Home Office.

In 2024-25, following many years of a flat cash budget, our budget is being reduced by three per cent. This is in the context of growing cost pressures and increasing operational risks and demand. Consequently, we are projecting an overspend for 2024-25, and it will be challenging to deliver our statutory requirements. In addition, whilst we have made every effort to plan within our current capacity and budget, the budget allocation lacks the capacity to respond to any unforeseen events or variations to the plan.

We have been given a capital allocation of c£349,000 for 2024-25. This funding will primarily be used to invest in a new case management system whilst also maintaining security and compliance in our legacy technologies. Some funding will also be used to replace end of life assets required for Operational activities.

The proposed expenditure on capital allocation is aligned to our strategic priorities and we will continue to review requirements throughout the year. We will continue to see opportunities to explore Green Technology, where appropriate, and work across arm's-length bodies (ALBs) to seek shared requirements, solutions and procurement, thereby protecting the public purse.

At present our fee income does not meet the costs of delivering the service, which means we are not compliant with HM Treasury's 'Managing Public Money' rules. In addition, there has been no increase in fees since 2009, as such we have submitted a fee review to the Home Office.

To ensure we achieve best value for the taxpayer and manage our finances robustly, we have implemented a new governance and decision-making structure.

The GLAA Board has oversight of the budget and responsibility for ensuring the delivery of the strategic plan, whilst the CEO as Accounting Officer is responsible to the Permanent Secretary for our financial management.

Practically, our budget challenges, performance and delivery will be managed by the Executive Team at Management Board. This is integral to our new governance structure which provides a framework for overall decision-making, to ensure greater financial control, as well as ensuring clarity on who has the power to make decisions, what processes are used to make these decisions, and how the outcomes of these decisions are communicated to all relevant parties.

By strengthening our approach to commercial management, the GLAA will ensure we are always getting the best value for money for the taxpayer.

Measuring our Impact

Achievement of this business plan is the collective responsibility of our Executive Leadership Team, who are held to account by the GLAA Board. The Board monitors performance against the plan using the key performance indicators (KPIs).

In addition, we report our financial performance to Parliament and are accountable to the Minister for our overall efficiency and effectiveness.

Progress will be measured against:

Key Performance Indicators	2023-24 Outturn	Target
Goal 1: Be a robust and effective regulator		
Median time taken to make a licensing decision on a new GLAA licence application.	98 working days	60 working days
Licence holders inspected each quarter.	-	6%
10% increase on the volume of section 12 and 13 investigations	84	92
33% increase in Compliance officers attending PIP1 training	1	4
Goal 2: Be known as experts in addressing worker abuse and exploita	ition	
Internally generated intelligence linked to control strategy priorities	-	50%
Average engagement scores across social media channels	4%	6%
Delivery of roundtables	-	2
Goal 3: Be an essential enforcement partner		
GLAA led investigations which result in a criminal or civil disruption order.	22%	25%
95% of victims assigned to our victim navigator are engaged in our investigative process	100%	95%
Lessons learned completed	4	4
Goal 4: Our People and Resources	l.	
Achieve a 5% increase in employee engagement through the completion of the People Survey	69%	74%
Ensure staff retention rates remain 75% or higher	82%	75%
Improve the gender balance by 10% in the GLAA Operations function	-	Improve by 10%
Average working days lost in a rolling 12-month period due to sickness absence, not to exceed 6.5 days	8.93	6.5
10% of colleagues from minority ethnic backgrounds	7.6%	10%
Deliver the service within 1% per cent of the overall budget.	-1% per cent	Within 1 per cent% of the budget

More information

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

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