**GLAA Stakeholder meeting 15 January 2025**

January 14, 2025, 10:32AM

1h 39m 29s

 **Suzanne Mccarthy** 28:31  
OK.  
I shall start then. Thank you very much.  
First of all, I want to warmly welcome you to this webinar. My name is Suzanne McCarthy and I'm a member of the GLAA board. The webinar is being recorded and will be shared after the event.  
Also, we will be sharing the slides that accompany the GLAA presentation.  
We expect the webinar to last around an hour or an hour and a half. We very much encourage questions. You should use the chat function to ask them. These will be answered during the webinar, either by the presenter or by other Glaa colleagues who will be online.  
If not answered during the webinar, your question will be answered or we will do our very best to answer your questions. Your question after the webinar finishes.  
We will try to answer as many of your questions as possible during the session to allow us to do this, please ask your question just once. We are unable to answer questions that are specific to individual circumstances. So for that reason, can we ask that you don't post any personal information?  
In the question box.  
Now the information you're going to receive today is correct as of today's date.  
Our guidance is updated regularly and we advise you to sign up to our Bulletin or refer to thegla.gov.uk website for regular updates. If we have any group or attendees that are logged into one device, please use the question box to tell us how many additional people.  
Are taking part with you. For example, if there are three of you taking part as a group, then please type 2 in the question box.  
Our programme for today, we hope, will provide you with important and interesting information. We will be hearing first from Alicia McCaffrey, the GLAACEO who will share some important updates about the glaa. Then we will be hearing from Roberts Stenson, who is one of our analyst, who will give an overview, an overview of the latest.  
GLAA intelligence.  
This will be followed by Michael Waters, one of our senior enforcement investigators, who provided an update on our regulatory activity. And finally, we will finish with Alison Clark, who is from the home offices refugee employability programme and she will be talking about E visas and how you can employ refugees legally.  
That ends my introduction and now, without further ado, I'm going to pass over to Alicia.

 **Elysia McCaffrey** 31:44  
Good morning everybody. I'm going to slightly controversially start by wishing everybody a happy New Year. I know some colleagues have said to me already it's a little bit late for that, but it is the first time we've seen you all this year. So lovely to see you all and it's lovely to see so many people on the group today.  
As Susanna said, we've got some really good presentations today and I just wanted to flag that Rob and Michael are really very experienced colleagues who've been with us for some time, who've seen a lot of stuff and it's a really nice opportunity to have them here. So please do ask them any questions.  
That you like Michael in particular, is one of our operationally deployed officers who is often on the ground in supporting people in real life and has a lot of very interesting insights. So any questions you have, please do ask them today.  
Also really tough to have Alison here. Thanks, Alison. I'm very much looking forward to your presentation. If I can have my next slide, please. Catherine, I just wanted to recap for some of you perhaps haven't been with us before. I'm sure you will know what the glaa is and what we do. Otherwise you wouldn't be here.  
But I just wanted to be really clear that our mission is about stopping the exploitation of workers in the UK, making sure that employers treat them fairly. And our mission really runs through the whole lifeblood of the organisation. This is why we get out of bed in the morning. This is why we do what we do and why we're so passionate about it. And I always think it's just helpful to kind of use this as a little bit of framing at the start of a session. Now, 2025 is going to be an exciting year. There's a huge amount going on and I'm sure that you will have all.  
Seen information about the creation of the new Fair Work Agency.  
Now some of you all have heard this previously talked about as a single enforcement body or a Seb, and it's interesting because we did some bit of digging last year when we were getting ready for the election, thinking about the single enforcement body and what that might look like. And it was actually first talked about 21 years ago. That was when this was first raised as a concept, bringing the GLA, the Employment Agency Standards Inspectorate and the national minimum wage team together to form one group now.  
The good news is that over the last 21 years, we haven't just kind of waited for this to happen. We work.  
Very closely with our counterparts in both of those organisations, but are really very pleased that now with the new employment rights bill, DBT is leading on the creation of this new Fair Work agency and 2025 for us is going to be a lot about working with DBT and getting ready for that. There is a lot already in the public domain around this and you what I think you can reasonably expect.  
Although of course the bill is going through at the moment, it's not an act yet, but The thing is looking like it'll cover national minimum wage.  
Modern slavery offences, statutory sick pay, the right to statutory sick pay isn't currently subject to state enforcement, and same with holiday pace, holiday pay will be part of this new organisation. All of the rules, unemployment agencies and employment businesses, gang masters licencing, which costs me know very well and we'll talk a bit about today. And there's also a potential for inclusion of.  
Financial penalties for failures in in certain areas.  
So there's a huge amount to think about there and some really big ambition coming from government around this, both from the ministers at the Department for Business and Trade and the Home Office and also the Deputy Prime Minister who's got a real kind of close eye on this as it's really important to her. So these organisations don't come together overnight and there's a lot that needs to be done. There's actually the committee sessions are running at the moment. It's not often I say go and watch Parliament TV, it's really interesting, but it is really interesting. Go and watch some of the sessions.  
There, if you have time as well, and I think we've got Joanne Young on today who of course is the chief executive of the ALP as a podcast that she did recently that I listened to over the weekend, which is really interesting, but her thoughts about the Fair Work agency in the future, Joanne might be sat there now cursing me, but I'm sure she would also love to pop a link in the chat for you all to go and have a listen to that. But there's some really interesting information in the public domain around this. So do have a look at that and potentially.  
At a future session, if you've got any questions.  
We could pick them up, can answer anything you've got today, but I should just highlight, depart for business. Trade, baby. They're leading on it. And we're working with them on that. So big year for us. But if we can just move on to my next slide.  
Really, the priorities for this year for us remain the same as they have. They remain in line with our strategy. So while we are working with DBT on the future and the growth and the investment and all of these brilliant changes which have been long-awaited and long called for.  
We are also, of course, still really focusing on our strategic plan and how we make sure that we are as robust and effective a regulator as we can be, how we make sure we're known to be experts in addressing worker abuse and exploitation and how we're working as an essential enforcement partner with others. And so just to recap on that, we've done in recent years a huge amount of work around our regulatory function. We've made sure that it is as lean and efficient as it can be and that in particular, if you're setting.  
The business that you get your licencing decision as quickly as is possible with all of the cheques that we need to do and we've really reduced the time that it takes to do that down. We've also really increased the number of compliance inspections that we do with a view to being supportive, helping people but also making sure that there's no bad practise that is affecting worker safety and well-being.  
We want to make sure that we're known as experts in addressing work abuse and exploitation because there's a lot of information that comes into glea that is unique to us and only we know about that and we want to make sure that we're using it to raise awareness of forums like this and many other things that we do.  
And also that we're making sure that the unique insight that we have is really being used to best effect to stop worker exploitation. And then goal three is around how we work in partnership with others and we do a lot of work with the police and with other responders and other organisations because it's really rare that you see that exploitation is the only issue that's happening quite often. There are much wider things as well going on. So this is the third year of our three-year strategy that we're coming into later this year.  
We're really proud of the work we've done on this. You know, we're a really small organisation.  
And that's why we're quite excited about the future and the Fair Work agency. But you can expect to see more of the same from us this year. And Suzanne, I think that's all I was going to say and this is any questions, but I can pick up questions throughout the session.

 **Suzanne Mccarthy** 38:21  
Yes, thank you, Alicia. First of all, I don't have anything in the chat for you at the moment, but you're not leaving us, are you? You're going to stay for the full web.

 **Elysia McCaffrey** 38:27  
I'm not. I'm. I'm here all day. Thanks, Suzanne.

 **Suzanne Mccarthy** 38:29  
OK. And if something comes in that you might be able to answer or contribute to, I certainly will bring you back in, but we'll move on now if we can, to Robert Stenson, who is going to talk about in the intelligence update. So Robert, over to you now.

 **Robert Stenson** 38:50  
Hi everyone, I'm Rob Stenson. I'm one of the intern analysts at the glaa. I'm just gonna give you a brief overview of our latest intelligence picture.  
What that means for how we deal with things and some of our intelligence gaps as well. So Catherine, if we could go on, please. So just a reminder of the control strategy priorities that were agreed in the autumn of last year. So we've got 3 central control strategy priority areas. So that is the seasonal worker scheme in the agriculture sector.  
That is the adult social care sector.  
And it's high risk labour providers, and that includes unlicensed activity as well. So there you kind of drive a lot of the operational work that we do.  
And across those control strategy priorities, but also across sectors more broadly, there's a cross cutting theme that we've that we've agreed on and that's around.  
Exploitation being linked to conditions of visas and or certificates of sponsorship.  
So that's that's a, that's a trend that we've seen emerge not just in relation to the CSP areas but in across a number of other sectors as well, including construction, retail for example.  
So this crimes, the purpose of this crosscuting theme is more as a sort of intelligence gathering exercise. It will help us consolidate information intelligence that we receive in and turn it in some into something that we can actually either internally or with our external law enforcement partners.  
Next slide please, Catherine.  
So some of the key findings from the quarter to quarterly assessment, so just to clarify our quarterly assessments run financial year. So this is for the July to September period in 2024.  
What we saw in the reporting intelligence that we got in was an equal split in terms of gender.  
Usually.  
We have. It's more commonly male victims that we encounter.  
But.  
This equal split between gender I think is highly likely a result of the increase in the care number of care referrals that we're getting in.  
Where the victims are predominantly female.  
So that's bringing those numbers up. Same can be said for the nationality in terms of Indian being the most common for victims. Again, that's highly likely influenced by the increase in care referrals that we're getting in.  
There's an outline of the potential exploiters, predominantly male, predominantly British.  
Again, that might be skewed in different sects depending what the sector is, but in terms of taking the information that we've gotten as a whole, that's what we saw in terms of potential exploiters.  
And then the top report sectors for quarter two last year was where care.  
Food service and retail support to clarify there that.  
Compared to care, food service and retail were even though their second and third.  
Reporting was relatively low. Still, it's just the care was was by and far the most common sector that we received insurgents on. I think it accounted for about 60% of referrals during quarter 2.  
So I just gives you an idea of where food service and retail sit in relation to that. We do have an ongoing Intel product right into the retail sector at the moment that's currently being compiled to understand the reasons for the increase in the number of retail referrals.  
So that will then help us operationally deal with those.  
Next slide please, Katherine.  
Some of the trends that we saw in quarter two were an increase in referrals and intelligence received in relation to the food processing packaging sector.  
Again, there's an intelligence products in the works at the moment to understand the reasons for that increase and what we can do internally or with our partners around that. We've seen a decrease in the level of agriculture of reports.  
The reason for that is probably the time of year. You know we're into.  
We're just moving through the peak season at that point, coming out of that.  
Autumn. Winter period. Uh. That's potentially a reason why we saw a decrease in that. Uh, we continue to monitor those numbers and any further decrease we'll obviously then.  
Prompt an investigation into why. What what's behind that decrease in numbers?  
In terms of the most reported form of labour abuse, that's our financial exploitation during quarter 2.  
And that can be anything from.  
Higher fees being paid for or excessive fees being paid for visas and or certificates of sponsorship and could be related to the non payment of effective non payment of national minimum wage. That's often tied to reports around.  
Long working hours for example.  
Next slide please, Catherine.  
So these are some of the Intel gaps that we have for glaa couple of these are quite long standing. It's important to clarify, there's a couple of elements to this. It's not just.  
These aren't gaps just because we don't necessarily receive the information in, but even if we do have the information, it's about how we align that with with the other information that we have, that external partners have.  
And even having that information, we're not able to generate a holistic intelligence picture, says 2 elements to these gaps.  
Victim demographics has long been a key one age, nationality, gender of potential victims, and not always reported.  
When they are reported, particularly around nationality, for example.  
Specific nationalities are necessarily always given. They're often described as overseas workers, for example, which which makes it difficult for us to pinpoint specific nationalities, so that hinders us in being able to generate holistic pictures around potential victims.  
Across sectors, but also in relation to specific, specific areas.  
Recruitment and methods of transport again.  
Insurgency gaps for us, it might be reported to us that people have paid excessive visa fees or have gone through a certain process, but there's very often very little detail around who does the recruitment, how that recruitment is facilitated.  
And then how the transport into the UK is facilitated as well?  
Season seasonal worker operators and what countries they're going to be recruiting from.  
We are trying to do a bit more on that to understand where works are going to be coming from for this season, but also for thinking into next season as well and then how payments are made is is becoming a more significant one for us, particularly with the increase in care referrals that we're getting in around elevated fees that are being paid.  
How are victims paying those fees? To whom? Where does that money eventually end up?  
We do have financial investigators at the GLA, as are having that information will make it slightly easier or will help us investigate those those concerns a bit more in conjunction with with our partner.  
Agencies and law enforcement partners.  
There's just a couple of Intel gaps for us, just to reiterate as well, the.  
People working within organisations, individuals working within the regulated sectors.  
Are an invaluable source of intelligence and information for us, so if you do encounter or know of non compliance or have any intelligence or information that you think will be pertinent for us to know.  
Please do share that with us, Catherine, if you go on to the next slide, we've got the e-mail address there to contact us on thing that might have changed since the last time we did one of these.  
So the e-mail address for for all intelligence for information is contact@glagov.uk. That will be then be filtered through the organisation or be able to action accordingly. Yeah, just thank you for the information and intelligence that we do receive in from from the regulated sectors and just a prompt to continue doing that.  
I need to drop off after I've done this, but I'm having to take any questions for now.

 **Suzanne Mccarthy** 47:53  
Robert.  
Yeah, we've got two questions that have come in. One is from Thomas Price and he says what does the data from the previous year say about agriculture?

 **Robert Stenson** 48:09  
From the just to clarify previous year, do you mean 2324?

 **Suzanne Mccarthy** 48:15  
He doesn't. He's not specific. Why don't you start with 2324 and then you could also do 23 as such.

 **Robert Stenson** 48:26  
Three, I think it reporting from the agriculture sector has been relatively consistent over the past few years, obviously because it's a regulated sector.  
There has been a slight decrease into 2425 more broadly.  
Not just specifically to quarter 2.  
Part of that could be down to the reporting period, but there there's different elements to this in terms of why we might be seeing a decrease in reporting. I think one element is potentially victims not necessarily wanting to come forward for fear of potential reprisals.  
People out on the ground might not necessarily sort of see see the exploitation.  
Like I said earlier, we're, we're continuing to monitor those numbers around agriculture. So if we do see that becoming a trend.  
Then we'll investigate further to understand what we can do to to increase that reporting in. Alicia, you've just come off, Mike, in case you wanted to say something.

 **Suzanne Mccarthy** 49:26  
Yeah. Do you want to say something further, Ali?

 **Elysia McCaffrey** 49:29  
I just wanted to talk about care sector points. Been raised there by Rafael, so just specifically to say that we've been doing lots of work around capturing what the key themes are that affect in the care sector and particularly where we've seen abuse linked to issues with visas and because we're sponsored by the modern slavery unit at the Home Office, we have very regular conversations with them about the problems that we're seeing and what we think will be helpful in terms of Home Office solutions to that.

 **Suzanne Mccarthy** 49:58  
Thank you, Alicia.

 **Robert Stenson** 49:58  
And we obviously work with our just to add to that, we obviously work with our partners at U KB I, immigration enforcement and MW around those other concerns 'cause obviously we as the GLA can't investigate concerns with visas or visa abuse.  
But having the intelligence and information to hand allows us to help our partners in relation to that.

 **Suzanne Mccarthy** 50:20  
I should say there is one comment here with four hearts next to it from Sam Zubodi, who says I can attest to the fact that glaa have been more proactive in terms of responding to our intelligence reports. So thanks to the team for that. Nice to have some positive feedback. We also have a question from Samantha, who says why don't the GLA know how people are getting into the UK transport, etcetera? Do they interview victims and ask them this question?  
Or are you talking about victims who have not yet been identified?

 **Robert Stenson** 50:54  
I need a. It's an. It's an element of both and it goes back to what I said at the beginning around the intelligent at the beginning, at around intelligence caps being there's a there's two elements to it. There's an element of us not receiving the information, but then there's also the element of us not being able to fully create a holistic picture, even with the limited intelligence or information that we do have. So.  
As Michael will probably go on to talk about it in a bit, we we are out on the ground, we do interview victims where we do interview victims. We do ask some those kinds of questions.  
So we do get that information in, but where that information?  
Is given. It's often in a limited capacity and so that prevents us from creating a holistic picture of of of a sector specifically or around a particular element of forced quotient, labour or labour exploitation. But then there is the other element that you mentioned there, Samantha, in terms of there are victims that we haven't identified yet, there are victims that aren't necessarily comfortable in coming forward.  
To a government department, for example. And so there's these things that we're doing as an organisation and again with our partners to try and.  
Become more accessible and and sort of convey the importance of sort of coming forward and and reporting non compliance or or poor working practises.

 **Suzanne Mccarthy** 52:25  
Thank you, Robert. I just want to say that for those who haven't noticed, we have in fact got Joanne's link to her podcast and also Catherine Roberts from the Glaa has put a link to our latest intelligence picture on our website.  
Thank you very much, Robert. I think we'll be moving now on to Michael. And as I said, Michael Walters is one of our senior enforcement investigators.  
And you're gonna provide a report, an update on regulatory activity. So over to you.

 **Michael Waters (GLAA)** 53:03  
Thank you very much, Suzanne for that and hi everybody.  
Yeah, Rob's done a good job there of covering quite a bit about how we are working on the ground, but I want to concentrate in the first instance on how we're investigating breaches of sections 12 and 13 of the gang Masters Licencing Act and a quick reminder of of the penalties for seriousness of what we're looking at here. So a summary penalty could end up with 12 months imprisonment and or a fine and on indictment if it went to the Crown Court.  
We could be looking at a 10 year imprisonment and refine so a serious topic area, but in the main.  
These sorts of matters are dealt with at a much lower level, so negative outcomes are drastically reduced, so you've got to be aware. Next slide please that referrals are made to the BRC.  
Or there may be points in your licence, or you may have your licence withdrawn. If it's quite serious.  
But what we're trying to do is revive your reputational damage to your company. The loss of your valuable customers and the loss of your employees. Now there's no benefit in taking A1 size fits all approach to policing this regulated sector.  
Obviously there's merit in maintaining the level playing field because you have to be seen or we have to be seen to be treating you fairly and that you see that your business area is in fact fair.  
And nobody's getting an advantage because things aren't being done properly.  
So it it's attractive to business and investors that we do this work, which is useful because the UK economy needs to grow and we want to foster a more constructive and transparent method of dealing with issues that you may just come across or may affect your business and we want.  
To end up with a a relationship with you that'll leads to better reporting, fairer outcomes and quicker results.  
Using a sledgehammer to crack nuts is a is a good euphemism that we're trying to avoid because we're here to help, and not necessarily.  
Try and bash companies unnecessarily. Next slide, please.  
So the the fact is that.  
I and my colleagues use to determine how the matters will be addressed.  
Fall into several areas and the first one that we've all got to be mindful of is the Deregulation Act and the supplementary acts that are mentioned there, which are known commonly as the Growth Duty Act, which basically tells.  
Government bodies that are enforcing law to be mindful, first and foremost.  
About the need for the UK economy to grow and that our investigations and our outcomes are do not undermine that unnecessarily.  
So with that in mind, when we take on a section 12 or 13 offence investigation.  
We're trying to be seen as fair, especially where genuine mistakes or clerical errors have occurred, and you've admitted them at the earliest opportunity.  
We prefer a self reporting.  
System of breaches because that weighs.  
In favour of the reporting party, when we determine how we're going to investigate the outcomes and the disposals that are fingertips, so positive mitigating actions are also in that are also instigated without prompting from us or anybody else.  
Again, if they reduce the impact of what's gone on and protect the workers and their employment, then that is also seen as a very positive step.  
And when which we will take into account when we're addressing how we're progressing the investigation.  
So yeah, we we are looking first and foremost.  
Have you protected the workers? Are they safeguarded? Next slide, please.  
So how does it work in realities so?  
Somebody will make a complaint or you you directly will make an admission. That, and it's quite a serious thing because you have discovered a crime. It's an offence to conceal it. So you want to get it out as quickly as possible.  
You need to address it quickly to protect your business from reputational damage.  
Your customers reputation and your workforce. So who are we going to contact?  
Well, first and foremost, as as Rob said, it's the same with the intelligence. It's direct through to us via the contact centre or to the Licencing Department if if you're a licenced business by the glaa, if you need advice beforehand, then you can contact any of the compliance officers or enforcement officers if you know them personally and we welcome.  
An early approach to discuss what's going on.  
And then give you some advice as we then progress it to making that complaint or that admission.  
There are also private companies that are able to do give you good advice before coming forward, and I can't advertise any particular company, but if you know of one, some of them are particularly good at doing things on your behalf. We want you to record the facts as they have occurred. Keep a diary of the events, secure any emails, messages, texts.  
CCTV and 1st accounts of any of the people that are involved.  
When you report, there's an early triage and impact assessment and again mitigating factors when we're looking at which way are we going to go with the investigation? It's your history with the glaa that will play an important part in how we progress that inquiry and you'd be wise to read.  
Or enforcement policy statement, which will come up on a slide later.  
And that .19 it reiterates mitigating factors.  
We then form an investigation plan.  
Your matter will be passed to the national investigation teams of which I am a part in the Southeast and people like myself will seek the truth, gather the evidence, and agree an investigative strategy with our line manager.  
Now, formal interviews at the end of the day, these are criminal allegations and there is a procedure to follow it.  
Doesn't mean the world is going to fall down on top of your heads because we're having a formal interview.  
Most allegations were require.  
Two formal interviews. One of the employee concerned and then one of the employees company. It's a legal nicety that this should occur and I don't want to spend time in explaining that because it's it's just not worth it and it's not. It's difficult, but at the time.  
Time we will.  
Explain fully how things will progress, how an interview will take place, and what you can do to prepare for it. This will not be an unannounced visit, and you'll be dragged off to somewhere to make an interview. We'll do it in the workplace. We'll do it at your home if necessary, and sit down and chat about what's occurred and see how we can best deal with it. So.  
That comes to the disposal points.  
Quite often, there's often no action or words of advice. There may be a written warning, and then we go up the staircase, so to speak, of LMEUS additional licencing conditions, points in your licence and then, well, we don't go any further than that in terms of addressing the issues, because if we've got to the stage of having to lay charges then.  
You've probably done something quite seriously wrong, and it wasn't a mistake.  
Next slide please.  
So why is it important? Well, there's six good reasons there is to stop the worker exploitation, prioritise investigations resulting in fair and proportionate outcomes, protecting compliant businesses and promoting that level playing field that I mentioned earlier and to promote engagement and sharing and information. And this is where I want to drive this message here today is to.  
Try and promote the fact that we are here to help.  
To promote your businesses.  
And and not just look at the the the mistakes that may bring your business into disrepute and and unfairly give punitive results that will affect you in the longer term.  
To ensure the investigations are available and accessible now, this is all about where we can spread ourselves to do the best work we can. Rob has already mentioned in the previous presentation about.  
Care homes. There is a lot of work to be done there and we want to spend as much time dealing with victims of care homes as we can or the workers in care homes.  
As as we would spend doing with matters relating to licencing issues, so the quicker we can get to dealing with section 12 and 13 offences with proper outcomes swiftly, the more time we can spend with other victims in other areas of the workplace.  
Obviously we want to support the economic growth in the UK.  
I'll. I'll come back to the message I I gave earlier. Let us be in no doubt where there is evidence of malice, criminal intent or other attempts at any malpractice.  
The GLA will take a more critical view and again, next slide please. You'll see from the documents that have been attached there. There is advice available on our website or through any of the contacts you may have with the GLA.  
We can provide you with a link to those documents that will assist you. I have another document which may assist you and I'll just.  
Oops, sorry, pull that back.  
Again, go to our website loads of information there and yes, we are free to discuss matters off the record.  
Especially if you've got intelligence about another business that you're you're concerned about.  
And that, in a nutshell, is it sort of.  
I'll give you a recent example.  
So recently information was received by the GLAA stating that a farmer was supplying labour to two other farmers without a licence to assist with the pruning of vines.  
The suspected farmer was in the process of applying for a GLA licence.  
We investigated the information and we found that the farmer was actually reaching out to other businesses to test if there was a market for the his Labour that he was trying to obtain a licence for and he'd not actually entered into any agreement.  
To supply workers or and had not in fact supplied workers. So the advice from the compliance team and licencing was that this activity was lawful and no action was agreed.  
The source of this information then came back.  
To the GLAA.  
With a video of an employee that he named who was working for the farmer and without a licence, there was.  
It seemed quite genuine. There was no malice here, so we we conducted.  
Further enquiries with the the farmer that had used the labour and it was established that there was a farmer to farmer agreement in place with the first farmer. Now that there's so many farmers, but the important thing was is that there was a a farmer to farmer agree agreement which is in compliance with our licencing standards.  
But we gave advice to the farmer that are provided that worker and was applying for the licence and told him look.  
Clearly there's some issues here in the in this this particular area, and you should be continuing with your application for a licence just to make sure that you're being covered for all eventualities. So there was no malice.  
By the farmer that was reporting the issue.  
And he wasn't to know that there was a farmer to farmer agreement in place.  
Because that's not necessarily something that the glaa has to be notified about.  
The negative impact on the farm businesses, had it not been progressed diligently and with a little bit of forethought could have been catastrophic because if anybody in the supply chain from certain brands associated to that product would have had ethical issues to address. So common sense has prevailed and our low profile approach ensured that everybody was satisfied with the outcome.  
The growth duty principles are maintained and we had a more holistic, realistic and constructive path to ensure ongoing compliance. So that's just a small example of many that we've dealt with. I can take any questions if anybody has.

 **Suzanne Mccarthy** 1:08:16  
OK, Michael, we've got a couple of things. First of all, can I just mention that Catherine has very hopefully put into the chat links to various documents that people might find useful, but you do have a question from Shane Tyler, who knows you with muddy by the way, he says section 12.  
Are possibly deliberate. However, sectioning 13 offences are 100% preventable after such a long time of the public register and active checking process.  
It should not be accepted, a labour user has not checked the licence status of the labour provider. Is there anything the industry needs to do more to stop section 13 than there are three loves to that and one hand up saying good on you.

 **Michael Waters (GLAA)** 1:09:05  
It's all about a company's due diligence and I can there are a times when a company.  
Becomes vulnerable. A classic example that I'm going to give it affected a couple of companies was during COVID there were workers that knew this regulated side of the businesses very well and for various reasons they couldn't attend the workplace at the time and it was a time for unscrupulous.  
People to bring workers into the sector and not be detected because the due diligence that was given by people with experience were actually missing from the workplace. So that's that's one example of of where that's gone. But Shane's are absolutely right. There's there should be little or no excuse, but sometimes it's a new employee who didn't know the rules or something like that and then.  
I have to weigh that up and my colleagues have to weigh that up against. OK, so there's been a mistake.  
Do we want to put 80 workers that are employed by this particular licence holder?  
At risk of becoming unemployed or are we better off working with that supplier or labour user to make sure that things are properly managed in the future and that's why I referred to additional licencing?  
Conditions etcetera. But yes, Shane is absolutely spot on in, in, in what he said.  
But we have to, we have to be mindful that there are periods or or times when things don't quite go right for a company.

 **Suzanne Mccarthy** 1:10:53  
OK. I've got two questions. I'm going to ask Joanne, first, before I ask, Karen, this is from Joanne Young, she says have a business ever been prosecuted for a section 13 offence?

 **Michael Waters (GLAA)** 1:10:53  
I hope that.  
Yes, they have personally not yet, but I've had other offences which were were very serious and to to give you a flavour last year.  
We convicted a Romanian male of human trafficking and.  
Modern day slavery and he got an unprecedented 8 years imprisonment and 12 years.  
In order to prevent him doing that sort of thing in the future. So.  
Yes, we have had successes across the board, but it'll be different teams across the the country. I'm one of four teams and I'm based in the southeast.

 **Suzanne Mccarthy** 1:11:55  
And the other one I've got here. The last question for you. I think at this moment, Michael is coming from Karen Gryphon and she says, who should we contact with regards becoming an approved external auditor. We are a PSCA approved certification body.

 **Michael Waters (GLAA)** 1:12:13  
Again, I'd I'd put your request through.  
Our contact centre and our senior leadership team will obviously have a look at that as an issue and then they will no doubt come back to you with some sort of response.

 **Suzanne Mccarthy** 1:12:28  
Thank you. And then Rachel McWilliams said.  
OK. Michael, shall I go ahead?

 **Michael Waters (GLAA)** 1:12:39  
Sorry, yes, you broke up a bit there. I I can see the the question you're mentioning England, Wales. Are there any difference of Scottish regulations? Yes, there are the the legislation in Scotland is different. But as Alicia mentioned earlier.  
With the single enforcement body, we are trying to address the differentials in the legislation that apply to our area of of work. Whether that comes to fruition or not, I don't know. But yes, we and there are issues as well.  
That affect Northern Ireland.

 **Suzanne Mccarthy** 1:13:14  
Thank you, Michael. I'm I'm going to bring your section to a close and thank you very much. Shane, also thank you by the way and introduce Allison Clark, who I said was from the Home Office. She's from the refugee employability programme and is going to be talking about E visas and how you can employ refugees legally. Welcome, Allison. Floor is yours.

 **Suzanne Mccarthy** 1:38:48  
I have to say that brings to the end the questions that have flowed in for you and I think the number of questions show how interested people have been in your presentation. Thank you for making the time to join us today. And that also concludes the webinar, which I hope people have found both enjoyable and informative. Our next day Coda webinar is on the 15th of April, so please put that in your diary.  
And I look forward to seeing you all again.  
In April, thank you very much and have a good afternoon.