



Gangmasters  
Licensing Authority

# Gangmasters Licensing Authority Annual Report and Accounts

1 April 2014 to 31 March 2015



Working in partnership to protect vulnerable and exploited workers





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**1 April 2014 to 31 March 2015**

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of the Gangmasters (Licensing) Act 2004

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# About us

The Gangmasters Licensing Authority (GLA) is a public body that regulates the suppliers of labour to the farming, food processing and shellfish gathering sectors. Our aim is to work in partnership to protect vulnerable and exploited workers. In practice the GLA partnerships will include responsible parties within the food supply chain, with other supervisory and enforcement bodies plus non-government agencies. The GLA will be unrelenting in its approach to disrupt labour exploitation in all its forms by any lawful, ethical and cost effective means.

## Who we are

The GLA was formally established on 1 April 2005. This followed the tragic deaths of 23 Chinese cockle pickers in Morecambe Bay in the North West of England on 5 February 2004. We are set up by statute, designated as an Arms Length Body, but accountable to Ministers who provide overall policy direction. The GLA's first sponsor department was the Department for Environment, Food and Rural Affairs (Defra). On 9 April 2014 sponsorship was transferred to the Home Office.



The organisation has a wide range of responsibilities, principally the administration and management of a licensing scheme to regulate the supply of labour into the GLA sector and the investigation of breaches in licensing standards and/or committal of criminal offences under the Gangmasters (Licensing) Act 2004 (the Act). We are led and directed by a Chair and Board appointed by the Secretary of State.

This is the 10th annual report and accounts and the ninth year of significant operational activity, which has seen the GLA continue to protect the integrity of the licensing system, catching unlicensed gangmasters through rigorous enforcement. The GLA also produces and promotes advice on how to maintain compliance across a range of areas of the licensing standards.

## Background

The GLA regulates the activities of gangmasters in the farming, food processing and shellfish gathering sectors across the whole of the United Kingdom. For the purposes of the 2004 Act a gangmaster is a person who supplies a worker to do work covered by the Act; or who uses a worker to do work covered by the Act in the course of providing a service, or makes arrangements for that worker to do the work.



Complementary to the regulatory aspect, the GLA is working with law enforcement partners to identify, disrupt and dismantle serious and organised criminality, people trafficking and other crimes whereby criminal ‘entrepreneurs’ seek to exploit human assets for profit. The GLA believes that preserving its frontline services is a priority whilst recognising the Government’s overall requirement to make efficiency savings.

The 69 staff of the GLA undertake the core functions of licensing, intelligence, compliance and enforcement, 31 being centrally based in Nottingham and 38 home based. Collectively these staff regulate a licensing scheme protecting up to 550,000 workers<sup>1</sup>, and investigate labour exploitation infiltrating the supply chain regulated by the GLA.

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<sup>1</sup> Hard work, Hidden lives the TUC report on Vulnerable Employment 2007 and subsequent report 2010

# Our achievements for 2014-15

Direct intervention with businesses preventing

**3064 workers**  
from being exploited



**£5.1m** Proceeds  
of crime  
identified



**100%**  
appeal success rate



**38 potential victims**  
assisted through the  
**National Referral  
Mechanism**



The above data has been obtained from internal data sources/\*Defra Food Statistics Pocketbook 2014





All three-year corporate targets achieved or exceeded ahead of schedule

22

Convictions



32 Organised crime groups identified or disrupted



Potential victims of exploitation removed from danger

Continued delivery of Stronger Together to labour providers, labour users and retailers



Modern slavery awareness training —

For 2500 supply chain and public sector staff who pledged to raise awareness of labour exploitation to an estimated 367,154 workers

The above data has been obtained from internal data sources

# GLA Overview



**Margaret Beels**  
*Chair*



**Paul Broadbent**  
*Chief Executive*

The close of the 2014-15 reporting period completes a decade of the GLA. During this time more than 2,000 gangmaster licences have been issued, over 90 prosecutions have taken place and, most importantly, direct intervention by the GLA has led to more than 10,000 workers being prevented from further exploitation.

In this past year alone more than 3,000 workers<sup>2</sup> have been assisted to prevent them being subjected to exploitative practices, 22<sup>2</sup> successful convictions have taken place sending out a clear message and steps have been taken to recover £3.5m<sup>2</sup> on behalf of workers. Furthermore, 104 licence application inspections and 103 compliance inspections have been conducted resulting in 27 licence refusals and 23 revocations. Added to this a total of 307 investigations have been instigated making 2014-15 a busy but productive period.

The close of the 2014-15 reporting period also brings to an end a year in which we have experienced three hugely significant changes in terms of the organisation's governance: change to the sponsor department for the GLA, the Modern Slavery Act 2015 and changes to the GLA Board.

Change to the sponsorship of the GLA from Defra to the Home Office took place at the start of the financial year, while the Modern Slavery Act 2015 received Royal Assent on 26 March 2015. This new Act will provide an overarching legislative umbrella under which our work will sit, but more importantly for the GLA, it stipulates that our role will be subject to a formal review and consultation within the next 12 months. Finally, on 27 March 2015, the appointments to the new streamlined GLA Board were announced by the Home Office just prior to Parliament being dissolved and the financial year coming to a close.

More detail on these and other matters are provided below but these are indeed dynamic times and there is tangible excitement within the GLA about what the next 10 years might bring.

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<sup>2</sup> Internal data source  
Gangmasters Licensing Authority  
Annual Report and Accounts 2014-15

## The new streamlined GLA Board

Plans to reduce our Board date back to 2012, when the Government's Red Tape Challenge (RTC) review concluded that a more compact governance structure would provide clearer strategic leadership and direction. A subsequent Triennial Review (as detailed below) reached a similar verdict and the recruitment process for a Board of up to eight members plus a Chair commenced towards the end of 2014.

At the end of the financial year, the Home Office appointed six members and announced its intention to appoint a further two members. However, this will be kept under active review until the potential timing of any new agency is clearer.

The six appointees from the initial recruitment represent an amalgamation of experience of past GLA work allied with some fresh thinking for the future. The members are independent but will confer with our key stakeholders to oversee delivery of the revised Strategic Plan for 2015-18, against the challenge of making efficiencies but expanding demands on GLA resources.

A smaller Board will result in more focussed discussions enabling all members to participate actively in the decision-making process. A key consideration for the new Board will be its engagement with the wide range of supportive GLA stakeholders.

## Our new Board Members



### Simon Allbutt

A human resources specialist, with extensive experience of the food industry, human resources, organisational development and governance.



### Bill Butler

The outgoing Chief Executive of the Security Industry Authority. He has enforcement, compliance, regulation and change management experience.



### **Angela Coleshill**

The Employment, Skills and Corporate Director at the Food and Drink Federation, was a previous Board member chairing the GLA Finance and General Purposes Committee (F&GP). She is a HR specialist with significant experience of both the food industry and the GLA.



### **Professor Linda Dickens MBE**

Emeritus Professor of Industrial Relations at the University of Warwick and an Independent Member of the Council of Acas. Her other public roles include Deputy Chair of the Central Arbitration Committee. She brings academic rigour and expertise in labour relations, employment law and human resource management.



### **Marshall Evans**

A previous Board member representing labour providers. He was previously Group Operations Director of Staffline and is a Non-Executive Director of the Recruitment and Employment Confederation. He has a substantial commercial background as well as significant experience of the GLA.



### **Paul Williams**

Chief Executive of the Sea Fish Industry Authority and a council member of the Shellfish Association of Great Britain. In addition to the seafood industry he has broad commercial and regulatory experience.

## Triennial Review

On 10 April 2014 the findings of the Triennial Review of the GLA were published<sup>3</sup>. These reviews are carried out on all Non-Departmental Public Bodies (NDPBs) to ensure the respective roles they perform are necessary and that they are complying with the principles of good corporate governance.

The conclusion of the Review was that the functions of the GLA are still necessary, that the GLA remains the right body for delivering them and that the GLA should remain an NDPB but should seek to reduce the size of its Board. It also concluded that the GLA should continue to deliver reforms already in train. It should continue to work to reduce financial and administrative burdens on compliant businesses and explore opportunities for alternative sources of revenue. Through this work the GLA should ensure effective communication to all its stakeholders.

The engagement with stakeholders carried out by the Review supported the conclusions of previous reviews. Almost all stakeholders were positive about the important role that the GLA plays in licensing labour providers and in ensuring that there is an effective, intelligence-led approach to enforcement. The combination of these two functions was seen to be important in ensuring that there was a level playing field for law-abiding labour providers, confidence for labour users e.g. farmers who use them as a source of labour, and adequate protections in place for workers to ensure that they are not subjected to exploitation.

Overall, the Review found a high level of support for the continuation of the functions of the GLA from both input into the Review and from the evidence for previous reviews. All those who fed into this Review highlighted the importance of the work that the GLA delivers. The Review confirmed the value of a mandatory licensing scheme for all businesses in the sector to provide a consistent and transparent landscape and supported the need to strongly tackle the minority of operators who wilfully break the rules, in the most targeted way. Therefore, the Review concluded that the role of the GLA is important and that the functions of licensing and enforcement remain necessary.

The Review also considered the full range of alternative delivery models, as set out in Triennial Review guidance, for delivering the GLA's functions. Some of these could be readily rejected as not appropriate. However, a more detailed assessment was made of the options considered potentially more viable resulting in the overall assessment that the GLA was the right body to discharge its statutory functions.

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<sup>3</sup> The link to the publication is <https://www.gov.uk/government/publications/triennial-review-of-the-gangmasters-licensing-authority>

## Move to the Home Office

The switch of sponsorship department, from Defra to the Home Office (on 9 April 2014) has enabled us to work more closely with our key strategic partner agencies. Policy oversight rests with the Public Protection section of the Safeguarding Directorate of the Home Office - in the same branch of Government as the agencies we work with the most – such as the National Crime Agency (NCA) (including the UK Human Trafficking Centre (UKHTC)), the Police, and the Anti-Slavery Commissioner. The move has provided us with an opportunity to refresh the governance arrangements between the GLA and our sponsors. The move also positions the GLA better to access services provided from within the Home Office.

One of the more significant challenges with the move to the Home Office is the transfer of IT systems. Both the Home Office and Defra have committed to ensuring that through this process the GLA operations are not materially impacted. The use of technology by the GLA supports the Government's overall agenda on Digital First.

The need to make efficiency savings will require us to be imaginative in finding more effective ways of working in partnerships, our use of technology and identifying fresh funding streams.

Going forward, we will also seek to extend and enhance the excellent links we have established with the staff from the Home Office, as well as continuing to develop an effective and successful relationship with the Home Office ministerial team.

## Modern Slavery Act 2015

We welcome the introduction of this new legislation, which received Royal Assent on the 26 March 2015. Both when the Bill was being drafted and during its passage through Parliament, there was widespread recognition of the GLA's excellent work and reputation as we were acknowledged as a lead authority on labour exploitation.

By far the most important development this new Act brings for the GLA is Section 55 which states that the Secretary of State must:

- (a) before the end of the period of 12 months beginning with the day on which this Act is passed, publish a paper on the role of the Gangmasters Licensing Authority; and
- (b) consult such representative bodies and other persons as the Secretary of State considers appropriate about the matters dealt with by that paper.

Karen Bradley MP, Parliamentary Under Secretary of State for the Home Office stated that 'the purpose of the consultation is to examine the role of the GLA and to help develop the evidence base needed to make effective changes to the GLA. This will include all aspects of the GLA's work'.

Lord Bates who sponsored Section 55 through the House of Lords commented ‘..... the consultation will look across all aspects of the GLA’s work and will consider how it can make an effective contribution to tackling worker exploitation through asking questions about how we can improve the way it gathers and shares intelligence with other agencies and the way it interacts with other agencies. The consultation will also examine possible changes to its enforcement activity and powers as well as to its licensing functions ..... The GLA performs excellently in its present role and we are seeking to ascertain whether, given this new piece of legislation, it can play a part in supporting the work of tackling exploitation’.

## Immigration Bill

On 21 May 2015 the Prime Minister gave a speech setting out the Government’s approach to immigration policy. He said:

*“But it’s not only our skills gaps that act as a pull factor for migrants; it’s the businesses who exploit cheap labour from overseas.*

*“That’s why, in the last Parliament, we quadrupled the penalties for those not paying the Minimum Wage, and why – for the first time – we’re naming and shaming those businesses.*

*“But while one employer or gangmaster can still exploit a worker in our country, luring them here with the promise of a better life, but delivering the exact opposite – low or no wages; horrendous housing; horrific working conditions - our task is not complete.*

*“So we will make a crucial change: creating a new enforcement agency that cracks down on the worst cases of exploitation. Responsibilities for this are currently split between 4 different departments. They will be brought into one body – so businesses can’t bring in cheap labour that undercuts the wages of local people.”*

He also said the government ‘will make it illegal for employment agencies to recruit solely from abroad without advertising those jobs in Britain and in English’.

The Home Office has recently issued the following statement:

*“The Government has announced an Immigration Bill to further the reforms started by the Immigration Act 2014. The bill will also create a new enforcement agency building on the work of GLA, HMRC, HSE and EAS to tackle the worst cases of exploitation. A consultation on the new agency is expected later in 2015.”*

The GLA already delivers much of what is expected of this new agency having, this year alone, revoked 23 licences, taken steps to recover £3.5m on behalf of workers and identified £5.1m<sup>4</sup> of criminal assets. We have also taken positive action to protect 3,064<sup>4</sup> workers and assisted or taken steps to remove 779<sup>4</sup> workers from their exploitative situation. Furthermore we have secured 22 convictions in courts across the UK relating to



labour exploitation and other related crimes including fraud, conspiracy and deception. The GLA also already works closely with enforcement colleagues overseas, particularly in foreign workers' home countries, to ensure that exploitation including charging work finding fees, false promises of decent work and a good life are quickly identified and prevented at source.

The review and consultation prescribed under the Modern Slavery Act 2015 provides an opportunity to review just what the GLA might bring in future to address the exploitation of vulnerable workers in the context of heightened public awareness of modern day slavery. We are also looking forward to the added impetus and fresh ideas that a new Board will certainly bring to the GLA.

**Margaret Beels**  
*Chair*  
15 June 2015

**Paul Broadbent**  
*Chief Executive*  
15 June 2015

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<sup>4</sup> Internal data source  
Gangmasters Licensing Authority  
Annual Report and Accounts 2014-15



# Chief Executive's Report

## How we perform our role

The GLA regulates a sector reported to be in excess of £100 billion<sup>5</sup> per year, across the whole of England, Scotland, Wales and Northern Ireland. This involves the management of nearly 1,000 current gangmaster licences. The two main strands of the GLA's work are ensuring compliance with the prescribed licensing standards and enforcement of the criminal offences under the Act, specifically unlicensed supply and use of labour in the defined sector.

Effective regulation and enforcement is risk based through intelligence-led activities that target non-compliant labour providers whilst allowing those businesses which do conform to the required standards to flourish. Such an approach commands support from businesses in the regulated sectors as it promotes fair competition. The maintenance of a fair market, whilst promoting national economic growth, continues to be a core GLA objective.

In line with most public sector organisations the GLA has had to deal with funding pressures during 2014-15. With increasing demands, resources have had to be targeted even more effectively to ensure that objectives are met and delivered. The GLA has sought to retain the investment in front-line services, predominantly compliance and enforcement officers, to ensure that unscrupulous labour providers cannot exploit vulnerable workers and defraud the Exchequer.

The Government, under the auspices of its better regulation agenda, has committed that regulation is delivered with a more focussed approach. The aim of lighter touch regulation ensures compliant businesses are not overburdened by unnecessary administration. This initiative is fully supported by the GLA. "Tier 1" interventions which involve the resolution of worker issues without formal action being taken by the GLA increased from 20 interventions in 2013-14 to 30 in 2014-15, an increase of 50 per cent.

The GLA will continue to seek to reduce the administrative burden on compliant businesses through its delivery of the Government's better regulation agenda whilst cracking down on rogue gangmasters who seek to gain competitive advantage at the expense of workers who are exploited financially, physically and psychologically.

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<sup>5</sup> Figure obtained from Defra Food Statistics Pocketbook 2014  
Gangmasters Licensing Authority  
Annual Report and Accounts 2014-15

## External Partners

The complexity and serious nature of our compliance and enforcement activities means that more often than not the GLA works closely with other regulators and enforcement bodies. The GLA will continue to work with all partner agencies to deliver its objectives and this has been enhanced by our transfer to the Home Office.



2014-15 has seen a significant increase in multi-agency operations in which the GLA has played a leading role. Enforcement partners include: HM Revenue and Customs (HMRC), UK Visas and Immigration, National Crime Agency (NCA), UK Human Trafficking Centre (UKHTC), UK Police Forces and the Health and Safety Executive (HSE).

The legacy of the Morecambe Bay tragedy in 2004 means that the GLA will give a high priority to the regulation of the shellfish industry. It does so in partnership with the Inland Fisheries and Conservation Authorities across the UK but particularly with the North Western, Scottish and Welsh Authorities. The cultivation of shellfish is closely regulated. A number of GLA officers are Royal Yacht Association/Maritime and Coastguard Agency Small Craft Basic Sea Survival trained. This permits them to take to the coastal and inland waterways to ensure that compliance and, more importantly, standards of safety are being met. A number of investigations into suspected unlicensed shellfish gathering have taken place this year with one major investigation currently pending Crown Court trial.

We also work closely in collaboration across the private sector and are pleased to report that there are a number of initiatives already in place to raise training and awareness within the industry. We aim to work in an open and transparent manner, meeting our legislative and service delivery obligations in accordance with the principles of better regulation and following the Government's statutory guidance on Managing Public Money.

The GLA continues to seek and work with new partners with valuable relationships built and enhanced over the past 12 months with Crimestoppers, the anti-trafficking charity Unchosen, and the organisers of the National Association of Citizens Advice Bureau. Other instances of partnership working in 2014-15 are given below.

## Examples of Partnership Working

### GLA Academy

The creation of a Training Academy in partnership with the University of Derby and the Ethical Trading Initiative (ETI) has allowed the GLA to deliver accredited and highly regarded training to the supply chain in order to prevent labour exploitation from occurring. This partnership is in the process of developing modules, which aim to provide business, key personnel and workers with the necessary knowledge and skills to identify exploitative

practice. It will draw upon the expertise of our partners in order to meet the needs of GLA stakeholders.

This builds upon the work previously done, particularly in relation to the Supplier/Retailer Protocol, which was launched in October 2013 by the Home Secretary, the Rt Hon Theresa May MP. The protocol led to a pilot training initiative to educate retailers on how to spot exploitation in their supply chains. This was run in conjunction with Sainsbury's supermarket, the Fresh Produce Consortium and Manor Fresh Ltd.

### Tackling Rogue Landlords - Boston Borough Council

The GLA was the primary partner along with the Council on this project after funding was secured from central Government. The work related to visits to check rented residential properties with a view to tackling landlords suspected of taking advantage of their tenants by placing them in unfit or unsuitable accommodation.

The GLA assisted by providing addresses known to be used by labour providers operating in the area and the Council estimates that some 30 properties were visited where the GLA and/or Lincolnshire Police had been involved in the identification and selection process.

Since the start of the project five cases have been taken to court by the Local Authority as a result of the scheme. Six instances of possible unlicensed gangmaster activity were identified, resulting in six inspections, two licence revocations and one refusal. The GLA has also experienced a 35 per cent increase in intelligence reports directly related to this activity.

### GLA National Conference 2015

The GLA hosted its inaugural annual conference in March 2015 with the aim of promoting its current work and future plans, highlight examples of best practice and seek views from stakeholders on where the GLA should focus its resources in the future. The event was



held at Derby's impressive iPro Stadium and was open to all licence holders and other interested parties.

Though the number of licence holders in attendance was down on that initially hoped for the general take up for places exceeded all expectations with additional capacity having to be added to the venue. From an initial target to sell 150 places, there were more than 240 in attendance on the day. Feedback has been excellent with 91 per cent saying they would

recommend the event to others in future and just short of 94 per cent saying that their expectations had been fulfilled. This now looks like being repeated on an annual basis.

## Santa Marta Group

This global body, which is supported by The Holy Father Pope Francis, is an alliance of police chiefs, bishops and representatives of other relevant organisations from around the world, who are committed to eradicating human trafficking and modern day slavery. These are international crimes and it is important for the GLA to maintain its international networks. The GLA was therefore delighted to be invited to join this group and attend its conference in London in December 2014.

The nature and scale of migrant work in the UK necessitates a close working relationship between the GLA and its enforcement partners in other countries, primarily Eastern Europe. A number of these countries are currently making plans to adopt the GLA operating model, particularly the source countries for workers travelling to the UK, as it is known that the early stages of exploitation, facilitation and trafficking take place before the victims arrive here. The GLA has recently chaired a European conference involving 18 countries and 10 key organisations sharing best practice, examining emerging patterns and trends of labour exploitation and forming information sharing agreements, all designed to avoid workers from becoming susceptible to compromise prior to actual exploitation.

The GLA operating model has also been shared with the United Arab Emirates and the International Organisation for Migration.

## Governance and Scrutiny

From 1 April 2015 the GLA moved to a reformed governance board of no more than eight independent members plus a Chair. The Board was formerly comprised of 28 members plus the Chair and further details can be found on page 39 in the Governance Statement. The GLA also has an Audit and Risk Committee (ARC) and will have other advisory/liaison groups as necessary to ensure a fully inclusive and integrated engagement environment exists between the GLA, its Board and the industry. These groups will also offer guidance and recommendations to the main Board thereby enabling it to concentrate on matters of most strategic importance.

The GLA is accountable to Home Office Ministers and is audited regularly through arrangements with Home Office auditors (Baker Tilly up to and including 2014-15) and the National Audit Office. The GLA has been the subject of various Government reviews over the recent past, including Hampton Report, Macdonald Report, Forestry Task Force, Review of Workplace Rights Compliance and Enforcement (“Davey”), Triennial Review, Comprehensive Spending Review 2010-15 and the Government’s RTC.

In a written statement to Parliament issued on 24 May 2012 Jim Paice, Minister of State for Agriculture and Food, set out the agenda for the future. In summary, the Government recognised the continuing need for the GLA to enforce protection for vulnerable workers in its sectors, but indicated that it needed to become better at targeting non-compliant operators and reducing the burden on the compliant.

From public consultation in 2013 the GLA has modified its approach to a number of functions. These include implementing a discretionary approach to site visits for some licence application inspections. The default position remains that all licence applications will receive a physical site visit unless specific circumstances exist making that



unnecessary. Changes to active checks and what appears on the public register have been implemented with the approach to 'earned recognition' being close to finalisation.

Section 55 of the Modern Slavery Act 2015 introduced a requirement for a review of the role of the GLA, publication of a paper and consultation on matters dealt with by that paper by 26 March 2016.

## GLA Staff

The GLA values its staff and this year has focused on empowering its workforce to deliver a challenging organisational strategy for protecting vulnerable workers. An exercise to determine what skills and knowledge we required to deliver this strategy resulted in specific learning opportunities being provided for all employees. In particular, work has been done with the University of Derby to improve the GLA's investigative skill set and provide accredited training, which all relevant staff successfully completed.

The "one team" staff seminar events occur twice a year and provide a forum for open discussion and review of performance. They also provide an opportunity to expose our employees to the wider law enforcement community.

Every employee has a job description and a set of business and personal development objectives. The performance management system has been overhauled to allow employees the opportunity to reflect on their performance; hold constructive conversations and determine how things can be continually improved. Consideration is being given as to how best to embed values further so they can be demonstrated in all GLA activities:

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

A key development this year has been the launch of the People Strategy. The Strategy will be underpinned by people plans to drive forward the GLA vision. The aims of the People Strategy are to:

- enable the successful delivery of the Strategy for Protecting Vulnerable and Exploited Workers 2014-17 through our staff;

- respond proactively to the change agenda and requirements of better regulation; and
- help create a high performance working culture within the organisation.

There are five strands for delivering the strategy which flow from the People programme:

- **Capacity** - the right staff with the right skills in the right place so that the organisation gets the most out of its resources through prioritisation and planning e.g. advance interview training for some officers to obtain best evidence from potential victims of gross exploitation.
- **Capability** - staff will continually develop skills and knowledge in order to maximise their potential and deliver current and future business outcomes e.g. training of front line staff in cognitive interview skills to more effectively identify when workers may be being exploited.
- **Reward** - a policy will be developed for rewarding staff which allows for flexibility and value for money whilst retaining high levels of engagement e.g. the review and redesign of the GLA pay structure and review and recognition scheme to reflect good and outstanding performance.
- **Performance management** - managers and staff will continuously drive high levels of performance at individual, team and organisational levels e.g. the revision of the performance appraisal and development review to more readily identify, through self-assessment and management intervention, an individual's strengths and areas for improvement.
- **Commitment** - staff will be highly motivated and engaged and understand their contribution to the GLA business objectives e.g. staff engagement in the review of the GLA three year strategy so they can contribute to and influence the strategic direction of the GLA.

Work has been done to ensure staff understand how to work safely. There is mandatory training for all new starters as part of the induction programme and on-going needs are met through e-learning or the provision of advice and guidance. The GLA is committed to the development and promotion of Equality of Opportunity for all through a comprehensive system of staff development, selection and care.

We will demonstrate commitment towards ensuring that no person receives less favourable treatment on the grounds of gender, civil partnership, marital status, race, colour, ethnic origin, nationality, faith, disability or impairment, age, social position, sexual orientation or be disadvantaged by any other requirement that cannot be controlled.

In order to achieve this we will develop policies, practices and procedures to ensure that individuals are recruited, selected, assigned and treated on the basis of their individual merits and suitability for posts.

We will treat all staff with dignity and respect and will endeavour, at all times, to provide a working environment free from discrimination, harassment or victimisation.

All staff have an individual responsibility to ensure that, in their dealings with everyone, they adhere to the principles and standards of the GLA as outlined in our Code of Conduct and policies.

As at 31 March 2015 there were two female (Chair and Director) and two male (CEO and Director) senior leaders with 28 female and 41 male staff in total.

Employees have been encouraged to share their views on a number of topics. Various methods were employed to achieve this including:

- An annual staff survey which had a response rate of 91 per cent
- A bi-monthly Workforce Improvement Group which has representatives from across the business and reports to our Senior Leadership Team meetings
- Staff Suggestion Scheme
- Open forums with our Chief Executive at our “One Team” meetings and ‘Friday at Four’ open conference calls
- The newly created intranet

The Chief Executive also provides regular ‘Keeping in Touch’ updates for all staff and is open to receiving feedback to issues that are raised. A vibrant Workforce Improvement Group plays an important role in identifying issues and suggesting solutions to a wide range of operational and strategic issues. These channels have allowed the GLA to provide opportunities for staff to influence the way that our business is operating.

## Resources

The GLA is a small NDPB. Its head office is situated in shared Government owned accommodation, with half its staff being homebased. Any future significant budget cuts through austerity measures will inevitably result in headcount reduction consequently disrupting our ability to discharge our statutory duties.

The GLA has, in line with other public sector agencies, seen funding reduce by more than 20 per cent as a consequence of spending review settlements. Wherever possible front line services have and will be preserved. Consequently, the majority of savings to date have been achieved as a result of reductions to back office staffing levels. The GLA is developing plans to use appropriate opportunities to generate revenue to allow us to get upstream of the criminal entrepreneurs that seek to infiltrate legitimate supply chains and profit from the labours of vulnerable workers.

Currently the GLA operates within the budget criteria agreed with the Home Office and a balanced budget for 2015-16 is in place. For 2016-17 and beyond, the situation is unknown but expected to be more challenging based upon current commentary for the future funding of the public sector.

# Strategic Report

## Aim, Priorities and Objectives

The GLA has consulted widely on its aim, priorities and objectives. Most recently it has taken feedback from its outgoing governance Board and also a wide range of key stakeholders including those at its conference in March 2015. The following takes into account those comments.

The GLA has a very clear aim:

**Working in partnership to protect vulnerable and exploited workers**

This aim will be achieved through the delivery of three clear priorities:

**Preventing worker exploitation**

**Protecting vulnerable workers**

**Tackling unlicensed/criminal activity & ensuring those licensed operate within the law**

To effectively measure success in these vital areas of activity there are six strategic objectives that all staff contribute to, are assessed against and which are continuously reviewed and evaluated to ensure the overarching aim is met.

**Target dismantle and disrupt serious & organised crime/early identification of human trafficking**

**Provide effective, meaningful engagement with stakeholders thereby enhancing reputation**

**Work with industry to recognise & address non-compliance without formal GLA intervention**

**Tackle tax evasion, H&S negligence, fraud, breaches of employment and other law/regulations**

**Maintain credible licensing scheme creating level playing field & promoting growth**

**Identify & tackle forced/bonded labour by licensed & unlicensed Gangmasters**



## Delivering the Priorities 2014-17

Working in partnership to protect vulnerable and exploited workers is dependent upon a clear framework for delivery underpinned by sustained performance under any climate. The framework includes:

- Strong governance
- Effective performance 'grip' and accountability
- Robust financial management
- A professional workforce

The framework will enable the organisation to realise continuous improvement in service delivery. Hence the GLA will deliver its aim through a framework of four strategic programmes, all led by an executive member, accountable to the Chair and the GLA Board with specific, measurable, time limited, realistic yet stretching objectives.

The four strategic programmes are listed below and will include, but will not be limited to, the subjects within each heading. The subjects will obviously develop over the course of the plan, and upon completion no doubt new and emerging themes will take their place.

A number of the subjects are cross cutting both internally and for other agencies but by setting a clear path for delivery, the GLA has a desire to constantly improve, be transparent in what it does, how and why, and also provide the most effective and efficient service possible by any NDPB/law enforcement agency.

The common theme running through these programmes is that the GLA will demonstrate in all it delivers that there is a proportionate yet robust grip of its business, relentless follow up to ensure delivery and a forensic attention to detail to reassure all who come into contact with the GLA that it will deliver against our aim, priorities and objectives.

## Strategic Programmes

The GLA delivers its strategy through a number of strategic programmes; each will have a senior responsible owner who is held accountable for progress and development of these programmes.

### **Prevent: prevent people from engaging in and being subjected to labour exploitation**

- GLA labour exploitation prevention plan which incorporates all prevent, protect, pursue, prepare activities from the Modern Slavery Strategy and its associated action plan
- Collaborative/integrated working with other agencies, bodies to prevent and identify any erosion of workers' rights
- Threat and risk based approach – development of improved structure to ensure effective deployment of resources

- Intelligence-led – National Intelligence Model (revised) compliance
- Use of intelligence to identify emerging trends
- Reduce the burden on compliant business
- Develop with other agencies problem profiles for industries at most risk of labour exploitation
- Stifle unscrupulous labour users/providers
- Organised Crime Group (OCG) Mapping, disrupt, dismantle
- Tackle criminality

**Productivity:** the concentration of resources, finance and focus in order to maximise efficiency and effectiveness

- Value for money – workforce planning, procurement, asset management
- Audit and compliance – targeted to provide greater insight
- Inspections, reviews, formal feedback
- Governance
- Compliance/enforcement – individual, team, partnership
- Outcomes led – Not target driven
- Value for money profiles – Comparisons, in sourcing, business partnering
- Outcomes and outputs
- Income generation, business growth, policy review, communication
- Joint performance measures

**People:** delivery of the aim, priorities and objectives of the GLA through its most critical asset

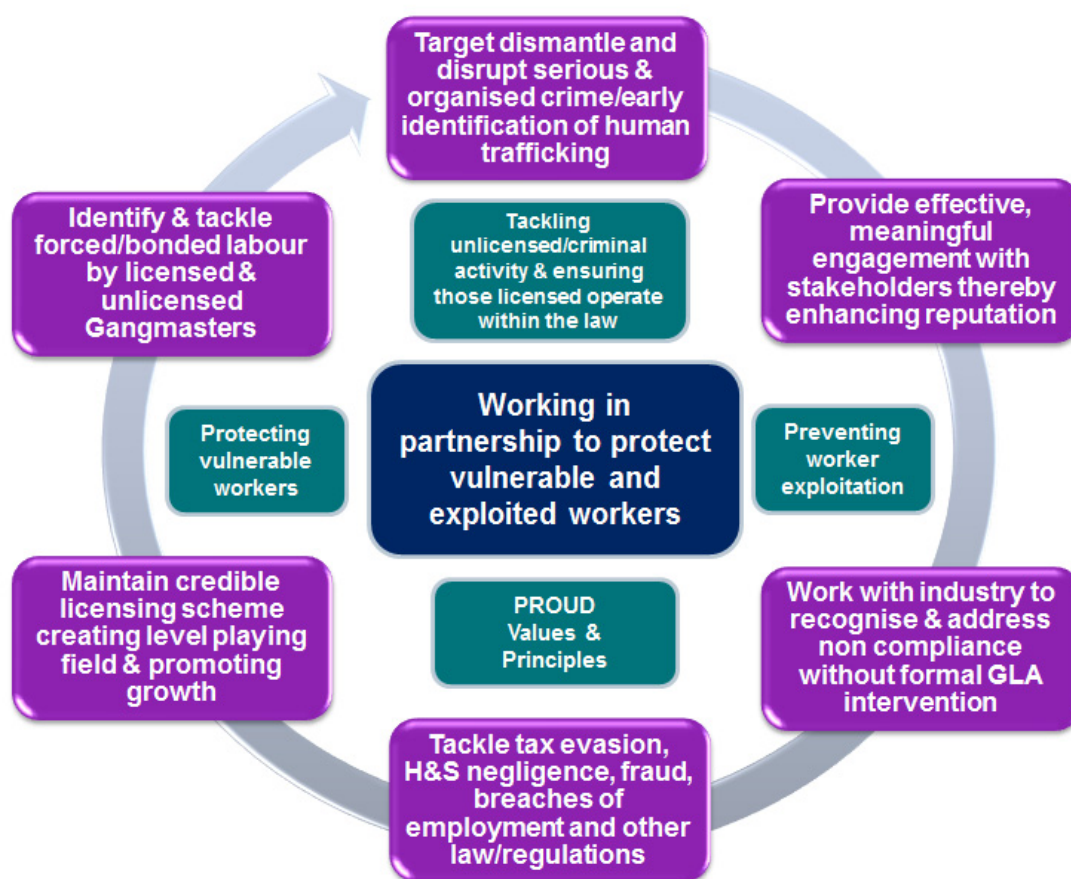
- Leading authority
- High performance
- Recruit and develop
- Inspire and motivate
- Reward and recognition
- Policies and processes
- Talent management and succession planning
- Equality and diversity

**Partnerships:** reducing the harm caused by labour exploitation through effective and sustainable partnerships

- Liaison groups, advisory committees eg. labour user/labour provider, worker/victim, retail
- Self and co-regulation by compliant businesses
- Retailer/Supplier protocol
- Government departments to include devolved administration
- GLA/ETI/University of Derby training academy
- Effective management of community intelligence
- Current and enabling service level agreements
- Joint agency tasking, threat/intelligence assessments

**Key Performance Measures**

The following diagram illustrates how delivery is monitored, measured and evaluated to ensure that the safeguarding of vulnerable workers in the GLA regulated sector is fundamental to all activity be it strategic, tactical or operational.



Some of the targets will be modified from time to time to reflect emerging trends in worker exploitation, however, the principle of performance improvement measured against time, trends and peers (where applicable) will remain.

Improvements will be measured and evaluated year on year against the 2012-13 baseline. They will be analysed over one, three and, where possible, five year periods to enable meaningful interpretation. They will also be based upon accurate data and analysis, supported by robust systems and structures and driven by staff with the necessary expertise and skill to maximise the function.

Performance against targets will be reported to the GLA full Board meeting and the Home Office to ensure oversight, scrutiny and governance.

## Management Commentary – Performance 2014-15

### One Target, dismantle and disrupt serious and organised crime/early identification of human trafficking

- The GLA has identified or given significant assistance to the NCA in the disruption or dismantling of 32<sup>6</sup> organised crime groups who are involved in large scale labour exploitation/modern slavery/trafficking
- A total of £5.1m has been identified as proceeds of crime and steps taken to seize such criminal profits
- 38<sup>6</sup> potential victims of trafficking have been assisted through the National Referral Mechanism (NRM) (support scheme utilising joint agencies and non-Governmental organisations (NGOs))
- The GLA has led or supported 53<sup>6</sup> joint operations and investigations with partner law enforcement agencies
- There have been 22 convictions in UK criminal courts for offences relating to labour exploitation with a further 15 pending<sup>6</sup>
- Effective exchange of intelligence between partner agencies

The work of the GLA continues to inform the overall picture of organised crime within the UK particularly in the area of modern slavery and worker exploitation in all its forms. The identification and recording of OCGs operating within the regulated sector remains a priority and we continue to liaise closely with the NCA, Regional Organised Crime Units (ROCU) and individual Police forces to ensure that, wherever possible, any criminality identified is tackled promptly and effectively by the most appropriate agency. This also ensures that the UK National Threat Assessment and other strategic fora with law enforcement, Home Office and other key partners remains current and informed. Tackling or disrupting serious and organised criminality is a complex area and requires an effective

<sup>6</sup> Internal data source

partnership commitment. During the course of the year we have explored every opportunity to develop and enhance partnership working leading to a significant increase in joint operations and investigations.

Our information sharing arrangements with partner agencies remains very strong with intelligence proactively collected, developed and disseminated to our enforcement partners.

The GLA, working jointly with the NCA and each individual police force to effectively and swiftly address and disrupt serious and organised crime, is instrumental in the fight against modern slavery.

We have assisted in a number of operations most notably in the Eastern region, the South West, the West Midlands and Northern Ireland. As an organisation we have identified criminal benefit totals in excess of £5m – although yet to be realised through the court process.

## Two Provide effective, meaningful engagement with stakeholders thereby enhancing reputation

- Implemented and embedded a 'Worker Exploitation Prevention Strategy' together with key stakeholders
- The continued effective use of liaison groups
- The creation of a European network of enforcement agencies whose primary role is to address labour exploitation (18 countries thus far rising to 32 by 2016)
- Modern slavery training/awareness raising has been delivered to 2,500 supply chain/public sector staff from 314 organisations pledging to raise the risks of exploitation to 367,154 workers<sup>7</sup>
- Stakeholder survey indicated 93.6 per cent<sup>8</sup> believe the GLA is doing a good or very good job
- Highly successful National Stakeholder Conference

This year we have looked for even more opportunities to connect with our stakeholders dedicating a large amount of time to meeting members of the industry and workers as well as regular contact with trade associations, trade unions, retailers and labour providers and users. The evolution of a business change and development role has helped us to develop more concepts much quicker than previously.

<sup>7</sup> GLA/Association of Labour Provider data source

<sup>8</sup> Internal data source

We were particularly pleased to launch our multi agency Worker Exploitation Prevention Plan which incorporates a number of tactical and strategic options and initiatives gleaned from best practice in the UK but also from overseas. This plan drives activity with which to prevent worker exploitation, prepare the industry to help itself to prevent worker exploitation, to protect workers from exploitation and also to relentlessly pursue those criminals who seek to exploit vulnerable workers physically, financially, emotionally and psychologically.

The Supplier/Retailer Protocol has matured this year and has co-signatories including the British Retail Consortium, the Food and Drink Federation, Fresh Produce Consortium and the GLA. This Protocol continues to yield strong results in terms of the increased flow of intelligence from parts of the industry not previously tapped into and also the identification of low level forms of exploitation that can be resolved quickly and effectively to the satisfaction of the worker without formal regulatory intervention.

Our ongoing commitment with the Association of Labour Providers raising awareness to the industry of the risks of labour exploitation in the supply chain, and our own training programmes devised at the request of key partners, has meant that we are able to raise the profile of the ever present risks of modern slavery to much wider audiences than before.

Formal partnerships have been formed with Boston Borough and Fenland District Councils to share Government funding to address unscrupulous landlords linked to labour exploitation in rural and semi-rural locations. We now also provide training to hitherto untapped resources such as local authority officers and health visitors who can assist to identify issues that would normally be out of sight.

### Three Work with industry to recognise and address non-compliance without formal GLA intervention

- GLA National Stakeholder Conference 2015
- Direct contact with labour providers leading to the immediate recovery of £13,617<sup>9</sup> on behalf of workers
- Positive proactive contribution to intelligence picture from industry sources

In March 2015 the GLA hosted its inaugural conference which was attended by more than 240 delegates including licence holders, labour users, retailers, law enforcement officers and other interested parties. Examples of best practice were shared with a focus on enhancing the already positive intelligence contribution from industry sources. There was overwhelming support and positive feedback for the GLA three year strategy and also that the greater emphasis on creating a hostile environment for the rogue gangmasters whilst easing the burden on the compliant was the correct path to take.

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<sup>9</sup> Internal data source

Delegates responded very favourably to our 'prevent, protect, pursue and prepare' approach being reflected from the Modern Slavery Strategy. In addition the GLA continues to engage positively with those labour providers who proactively seek to address non-compliance and therefore avoid unnecessary intervention measures.

Throughout the course of the year the GLA has maintained constructive dialogue with its licence holders and has introduced the "Tier 1" resolution procedure which allows for the immediate rectifications for oversights over non-payments of small amounts of wages etc.

This year £13,617 was identified and quickly returned to exploited workers. Whilst not sounding significant, a worker on the minimum wage cannot afford any shortfall in their salary. In fact, the GLA increased the number of direct informal interventions with labour providers by 29 per cent over the last year, a 16 per cent increase in the sums recovered on the previous year.

A great deal of work has gone into assisting the statutory authorities and the industry itself to manage the shellfish gathering sector. There are real and present inherent dangers around shellfish gathering and the GLA has worked extensively in the coastal areas to ensure that the gathering that does take place is under a strictly controlled environment with the safety of the workers of paramount importance. To be more effective, officers have been trained and awarded the Royal Yacht Association/Maritime and Coast Guard Agency small craft sea survival certificate to ensure they can be deployed effectively.

#### **Four Tackle tax evasion, health and safety negligence, fraud, breaches of employment and other law/regulations**

- Closer working with HMRC including a dedicated technical adviser on tax issues
- Targeting illegal 'travel and subsistence' or non-compliant tax avoidance related practices
- Direct intervention on behalf of 3,064 workers to prevent them from exploitation
- Compliance inspection activity remains intelligence-led and focussed on serious non-compliance of licensing standards
- Tackling rogue landlords

This strategic outcome is underpinned by the eight GLA licensing standards and the 38 sub-criteria that each applicant and existing licence holder is assessed against. Wherever elements of tax evasion, health and safety, breaches of employment and other law or regulations are identified there is a notification to any other relevant statutory body which may wish to investigate further matters that the GLA has uncovered.

All GLA inspection activity is intelligence-led. During the last 12 months the GLA responded to over 340 allegations of breaches of licensing standards and undertook 103 compliance inspections. This represents a 16 per cent increase in compliance activity when compared to the previous year.

During the year the GLA has issued further detailed guidance to the industry on matters such as Travel & Subsistence Schemes, Fees and Charges and Licence Maintenance issues.

Last summer the GLA was a primary partner with Boston Borough Council on a centrally funded project to tackle rogue landlords i.e. those landlords suspected of taking advantage of their tenants by placing them in unfit or unsuitable accommodation – an issue commonly linked to labour exploitation and human trafficking. From that initiative, landlords in the Lincolnshire area now need to hold a Local Authority issued licence to demonstrate their adherence to standards and it is believed this may be implemented nationally.

Added to this, a number of criminal prosecutions are ongoing which include fraud, sham marriages, obtaining a GLA licence by deception and other breaches of employment law. It is stressed that the vast majority of GLA licence holders are not only compliant but seek to ensure that they demonstrate transparency in all they do. Sadly, of the 23 licences revoked during this reporting period a number of businesses in the GLA regulated sector, employing a total of 3,064 workers, were known to have used exploitative practices. Steps have also been taken to recover a further £3.5m on behalf of workers. This would include such matters as unpaid wages, holiday pay or excessive transport charges.

Over the year there have been 53 joint operations with partners including HMRC, numerous police forces across the UK, Local Authorities, Fire and Rescue, Department for Work and Pensions, NCA, HSE and others.

#### **Five Maintain credible licensing scheme creating level playing field and promoting growth**

- New licence applications consistent with previous year
- Robust approach to serious non-compliance
- All licence 'Appeals' upheld by the Appointed Person in favour of the GLA decision
- European GLA enforcement network
- Licence holders satisfied with the service provided by the GLA – 86 per cent<sup>10</sup>

The GLA maintains a robust but fair licensing regime which continues to withstand robust and independent external scrutiny through the appeals process. In the last five years the GLA has successfully defended the licence decision in all cases that have been considered by the Appointed Person. This demonstrates a proportionate, necessary, lawful and appropriate approach using licence revocation as one of the last resorts to protect workers.

<sup>10</sup> Internal data source



The number of licences granted for 2014-15 were 82 with 27 refusals and 23 revocations out of an overall total of 954 licences in existence.

Independent audit validated the discretionary approach to physical site visits as part of the application process. This approach was used on seven occasions during the last year out of a total of 115 applications processed. No adverse issues resulted from the decision not to personally visit those premises.



A formal review of the licensing standards is due to take place during 2015-16. This will include a public consultation and will be led by the GLA. It is hoped that the licensing standards will then more accurately reflect the forced labour indicators widely used through the Modern Slavery Act and international indicators and then, in turn, more accurately reflect the changing trends in labour exploitation.

The GLA and the Home Office have overseen the creation of a network of GLA equivalents across Europe (18 countries) but with an ambition of a membership of 32 countries by 2016. The purpose is to share best practice, current trends and information in real time thus seeking to protect a transient population of workers working across Europe but also to identify and disrupt those criminals who do not work within borders and seek to exploit people financially and physically wherever they can. Hence for the enforcement agencies to share information regarding exploitative practices in source, transit and destination countries is a major step forward in preventing exploitation at source.

In the annual survey of licence holders 86 per cent stated they were satisfied with the service provided by the GLA. This is an improvement from 83 per cent the previous year.

## Six Identify and tackle forced/bonded labour by licensed and unlicensed gangmasters

- 779 potential victims of labour exploitation have been identified and given support to remove them from danger
- The GLA has led or supported 53 joint operations and investigations with partner law enforcement agencies
- Serious tax evasion and fraud has been prevented including the refusal and revocation of three licences of tax relief scheme operators
- A total of 23 licences were revoked including two revoked immediately directly stopping the continued exploitation for over 163 workers. All workers were rehoused and found other jobs in the GLA regulated sector
- Eight joint operations were carried out into suspected illegal shellfish gathering which still presents obvious dangers for those involved
- A growing number of fraud, violence and offences including sham marriages have been identified through the activities of unlicensed gangmasters

It is on public record that the GLA has been a leading contributor to the UK in response to modern slavery including giving evidence to the Modern Slavery Bill Evidence Review, the All Party Parliamentary Group on Human Trafficking and the Joint Committee on the Draft Modern Slavery Bill. From other witnesses who gave evidence there was widespread consensus over the excellent reputation of the GLA and it was commented that “across Europe the GLA has been held in high regard as an example of good practice”.

The action taken by the GLA to revoke two licences immediately during this year resulted in 163 workers being saved from prolonged and further exploitation and also prevented hundreds more from entering the supply chain through this means and then also being exploited. It is pleasing to note that through strong partnerships with statutory agencies all the displaced workers were found alternative accommodation and employment straight away. Thus, this has overcome a significant barrier to workers coming forward, them being told that if they did so, they would become jobless and homeless.

## 2014-15 Performance against 3-year corporate targets

Target	Status	Commentary
Increase by 15 per cent year on year the number of actual and potential victims of labour exploitation identified, and given support to remove them from danger/raise awareness of their rights	Exceeded	The cases where the GLA was the lead or referring agency to facilitate assistance are as follows: 2012-13 = 39; 2013-14 = 39; 2014-15 = 50. However, this particular measure was broadened out from previous years having focused only on potential victims of forced labour. This new measure now includes the number of actual and potential victims of labour exploitation identified and given support to remove them from danger/raise awareness of their rights. This figure is 779 and will be used as the baseline for subsequent years.
Increase by 20 per cent year on year the identified criminal profits from GLA investigations and joint investigations, for consideration of seizure of proceeds of crime through unlawful activity within the sector	Exceeded	The process of realising the proceeds of crime takes many months to come to fruition and Treasury incentivisation rules indicate that forfeited proceeds of crime are divided equally between the Courts, Crown Prosecution Service and Law Enforcement. This means that the GLA share of any realised confiscation would depend on whether it is the sole or joint investigating agency. During the reporting year the business benefit figure identified for potential proceeds of crime proceedings was £5.1m which significantly exceeds the previous year of £750,000. This recent figure is affected by one substantial case. At the time of reporting, no proceeds of crime court proceedings had been finalised.
Increase by 15 per cent year on year the number of referrals (successfully identified as victims) made to the UKHTC (NRM referrals)	Exceeded	The GLA was involved in a number of joint operations with Police and other partner agencies during 2014-15. Examples include Operation Triage and Operation Badsworth where a number of potential victims of human trafficking were identified and criminal proceedings are ongoing. The number of referrals of potential victims of trafficking to the UKHTC that the GLA was involved in was 38 which is an increase from 18 the previous year.
Increase by 15 per cent year on year referrals of the identification and activity of OCGs to Law Enforcement ROCUs	Exceeded	The GLA is authorised to identify and refer the identification and activity of OCGs to the NCA and also to the ROCUs. During 2014-15 the GLA reported on 32 significant OCGs who are involved in labour exploitation as a priority crime type. This is an increase from 2013-14 of 12 such groups. The GLA continues to work with law enforcement to disrupt, at every opportunity, these criminal networks.

Target	Status	Commentary
Increase by 10 per cent the identification of workers' unpaid holiday pay, breaches of national minimum wage and enforcement of breaches of employment standards/statutory employment rights	Exceeded	The identification and positive and immediate action to prevent further breaches of the GLA licensing standards are included within the management information portfolio examined quarterly by the GLA Board to inform any significant issues or trends.
Increase by 20 per cent year on year the assistance given to labour users/providers in the co-identification of and dealing with potential worker exploitation prior to formal regulatory engagement	Exceeded	There are cases where the GLA makes direct contact with the labour provider in an effort to identify and resolve minor issues without the need for formal inspection activity. In 2014-15 there were 30 such interventions leading to the recovery of £13,617 on behalf of workers which is a 50 per cent increase from 2013-14 when there were 20 such interventions.
To develop closer working relationships with HMRC, HSE, NCA, Local Authorities and law enforcement agencies through joint operations rising by 25 per cent year on year	Exceeded	Data relating to information exchanged between the GLA and other agencies, including the above, demonstrate that the GLA is very active in ensuring that relevant information is disseminated. Further breakdown of this information is examined by the F&GP. During 2014-15 there have been 53 joint operations with partners including HMRC, Local Authorities, Police, Fire Service, NCA, HSE and others compared with 22 operations in 2013-14.
Improve the satisfaction of licence holders with the service provided by the GLA to 85 per cent in year one and reviewed/ revised thereafter (2013-14 baseline = 83 per cent)	Exceeded	As a customer centred organisation, the GLA is seeking to continually improve its service to licence holders. In 2013 structured feedback was sought to establish a satisfaction with service baseline (83 per cent) from which the GLA can make tangible and measurable improvements to the way it works. During the reporting period satisfaction of licence holders in this area increased to 86 per cent.

Target	Status	Commentary
Improve perception amongst all key stakeholders that the GLA is doing a good or very good job to 80 per cent in year one and reviewed/ revised thereafter (2013-14 baseline = 87.3 per cent)	Exceeded	Stakeholders were surveyed to establish the level of confidence they have in the GLA doing a good or very good job. From a baseline of 87.3 per cent the organisation is able to identify which issues are most important to partners and make adjustments and alterations as appropriate for the forthcoming years. During the reporting period satisfaction of licence holders in this area increased to 93.6 per cent.

### 2014-15 performance against within year targets

Target	Status	Commentary
By March 2015 to have reviewed the GLA Licensing Standards to ensure that they best support the GLA's strategic aim, priorities and objectives	Deferred	This action has been deferred to take full cognisance of the Modern Slavery Act that was passed on 26 March 2015. The standards will be reviewed during 2015-16.
By March 2015 to have identified the full range of alternative and cost effective solutions for the GLA to take full ownership of its own ICT infrastructure	Deferred	On 9 April 2014 the GLA transferred sponsor from Defra to the Home Office. Consequently there have been a number of key organisational issues that needed to be addressed. This included the Home Office 2015-16 change of IT platform. Changes to the GLA IT infrastructure have therefore been deferred until 2015-16.
By March 2015 to implement the Triennial Review recommendations	Achieved	All recommendations within the ambit of the GLA to deliver have been completed. These include a review of documents governing the relationship between the GLA and its sponsor department; GLA board reform; development of effective communication and engagement that feed into Board decision making considerations; governance mechanisms have been developed to take into account stakeholder views and that they be sufficiently flexible to allow for any necessary adaptations in the future.

Target	Status	Commentary
By March 2015 to develop, through innovation, sustainable funding streams to enhance and support the future development of the GLA	Deferred	A number of alternative funding and business models have been presented to the Home Office but which have been deferred pending the outcome of the review of the role of the GLA emanating from Section 55 of the Modern Slavery Act 2015.
By March 2015 to fully embed / implement all RTC recommendations	Achieved	All recommendations within the ambit of the GLA to deliver have been completed. These include discretionary approach to physical site inspections and amendments to the public register.
By January 2015 to have improved the stakeholder survey response rate to 15 per cent	Achieved	The 15 per cent response rate target for stakeholders believing the GLA does a good or very good job has been achieved with 93.6 per cent of respondents believing that is the case, this being an increase on previous years. This has recently been corroborated by a similar survey by the Association of Labour Providers in that 93 per cent of its members believe the GLA does a good job.
By January 2015 to have improved the licence holder survey response rate to 15 per cent	Not achieved	The response rate received was 11 per cent which, whilst disappointing, is not unusual for surveys of this type. In future years the survey will be carried out on a 'rolling' basis and notwithstanding the response rate, satisfaction levels have risen to an unprecedented 86 per cent of licence holders being satisfied or very satisfied with the overall service provided by the GLA. This assessment has been further validated by a survey from a major trade body, the Association of Labour Providers, of whom 93 per cent of its members were satisfied with the service of the GLA.



**Paul Broadbent**  
*Chief Executive*  
15 June 2015

# Directors' Report

## Explanation of Funding 2014-15

Prior to the start of every financial year the GLA agrees with sponsor department its budget and funding. Funding has been agreed in advance for 2015-16.

The Statement of Comprehensive Net Expenditure for the year ended 31 March 2015 on page 54 shows a deficit of £588,000 (£585,000 2013-14).

For the purposes of financial reporting, the Grant-in-Aid (GIA) does not form part of the GLA's income and is accounted for in the Financial Statements within the Statement of Changes in Taxpayers' Equity for the year ended 31 March 2015 on page 57. Under the the Act, income from licensing receipts is surrendered to the Secretary of State who in turn surrenders it to the consolidated fund.

The table below illustrates the funding allocation (including GIA) which reflects a more accurate position of the GLA's performance against budget. In 2013-14, the GLA drew down the full amount of its approved GIA funding. In 2014-15 funding was only claimed in line with agreed cash requirements.

The total expenditure for 2014-15 includes some one-off restructuring costs of £184,000 relating to Board recruitment and removal of staff's right to incremental pay.

Income Budgeted for Year	Note	2014-15 £000's	2013-14 £000's
GIA non-ring-fenced (cash)	7	1,296	1,270
GIA ring-fenced (non-cash)	7	200	186
Enforcement income	5	2,951	2,890
<b>Total income</b>		<b>4,447</b>	<b>4,346</b>
<b>Total expenditure</b>		<b>(4,377)</b>	<b>(4,319)</b>
<b>Underspend</b>		<b>70</b>	<b>27</b>

## Pensions Arrangements

Pension arrangements for the GLA are covered by the Superannuation Act 1972 and reflect benefits for members of the Principal Civil Service Pension Scheme (PCSPS). Further details can be found within the Remuneration Report (pages 45 to 50) and in note 3 (pages 63 to 64).

## Payment Policy

The GLA has a payment policy for all goods, services, works and contracts. Where there is no contractual provision or accepted practice governing the time of payment, the GLA's aim is to pay within 10 days of receipt of goods or service, or within 10 days of a valid invoice, whichever is the later. We have also undertaken the Department for Business, Innovation and Skills' directive to pay invoices within five days wherever possible. This is in accordance with the Government's Best Payments Code, the British Standard for Achieving Good Payment Performance in Commercial Transactions (BS 7890), the Parliamentary Control of Expenditure and the need to protect the Exchequer's interest. For 2014-15 the GLA achieved an average payment time of 3.88 days (4.41 days in 2013-14).

## Complaints Procedure

The GLA has an established policy for dealing with complaints. All complaints are responded to in writing by the GLA and the ultimate responsibility lies with the GLA's Chair through the Chief Executive. If not satisfied, the complainant can then refer the matter to the Parliamentary and Health Service Ombudsman, who investigates complaints about maladministration or service failure on the part of the GLA.

Enquiries to the Ombudsman should be made via the complainant's local MP in writing within 12 months of the matters alleged in the complaint. The MP will then forward the complaint to the Ombudsman. In order to find out who your local MP is, please go to [www.findyourmp.parliament.uk](http://www.findyourmp.parliament.uk) or contact the House of Commons Information Office on 020 7219 4272.

In 2014-15 the GLA received 11 complaints most of which related to licensing decisions (12 complaints in 2013-14). None of the 11 complaints were upheld or referred to the Ombudsman.

## Freedom of Information Act

Under the Freedom of Information Act 2000 (FOI Act), which came into force on 1 January 2005, anybody may request information from a public authority which has functions in England, Wales and/or Northern Ireland. The FOI Act requires that all requests are in writing (this does include emails), stating clearly what information is required with the name of the applicant and an address for correspondence. The GLA provides guidance on how it handles Freedom of Information requests under Section 12 of its External Communications Policy.

In 2014-15 the GLA received 38 requests (13 requests in 2013-14) under the FOI Act with 34 responses provided inside the stipulated 20 day period. The remaining four were responded to late due to reasons outside the control of the GLA.

## Information Security

There have been no incidents of loss of personal data during the year (none 2013-14).



## Disabled Persons

In line with good practice towards applications for employment, the GLA considers applications from disabled people on the basis of the qualifications and abilities of each individual. Should an employee become disabled during the course of employment, every practical effort would be made to allow him/her to continue in his/her employment.

## Diversity and Equality

The GLA's policy on Diversity and Equality states that:

The GLA is committed to the development and promotion of Equality of Opportunity for all through a comprehensive system of staff development, selection and care.

We will demonstrate commitment towards ensuring that no person receives less favourable treatment on the grounds of gender, civil partnership, marital status, race, colour, ethnic origin, nationality, faith, disability or impairment, age, social position, sexual orientation or be disadvantaged by any other requirement that cannot be controlled.

In order to achieve this we will develop policies, practices and procedures to ensure that individuals are recruited, selected, assigned and treated on the basis of their individual merits and suitability for posts.

We will treat all staff with dignity and respect and will endeavour, at all times, to provide a working environment free from discrimination, harassment or victimisation.

All staff have an individual responsibility to ensure that, in their dealings with everyone, they adhere to the principles and standards of the GLA as outlined in our Code of Conduct and policies.

## Sickness Absence

For the reporting year to 31 March 2015 the average number of days lost to sickness for our staff was 7.5 (6.2 in 2013-14). This compares against a public sector average of 8.7 days.

## Basis of Accounts Preparation

These accounts have been prepared in the form directed by the Home Office, with the approval of HM Treasury in accordance with Section 23 of the Act.

The Financial Statements are prepared in accordance with regulation 9(2) of the Gangmasters (Licensing) Authority Regulations 2014 and directions made thereunder by the Secretary of State, reporting the state of the GLA's affairs as at 31 March 2015 and of its surplus for the year.

The GLA's accounts are audited by the Comptroller and Auditor General.

I have taken all necessary steps to make myself aware of any relevant audit information and to ensure that the GLA's auditor is aware of that information. As far as I am aware, there is no relevant audit information of which the GLA's auditor is unaware.

Any events that would impact on these accounts after the 31 March 2015 are stated in Note 20 on page 75.

A handwritten signature in black ink, appearing to read 'P. Broadbent', with a stylized flourish at the end.

**Paul Broadbent**  
*Accounting Officer*  
15 June 2015

# Governance Statement

As the designated Accounting Officer for the GLA, I have responsibility for the management and control of the resources used within the organisation. This Governance Statement explains the GLA's governance arrangements, describes how risk is managed, outlines the system of internal control and comments on the effectiveness of these arrangements.

The GLA is responsible for managing a diverse range of risks and is committed to engaging effectively with its customers and stakeholders to ensure that their views are known and taken into account in the decision making process.

## Framework

The GLA's activities are controlled and monitored by the GLA's Board whose members are appointed by the Secretary of State.

During the year the Board consisted of the Chair, Margaret Beels (formerly McKinlay), and 19 members nominated by 15 organisations, with three vacancies, two of which were filled by nominated observers. In addition there were nine ex-officio members, with one vacancy and one official observer. Meetings are also attended by the GLA's Executive.

The Board has a number of sub-committees that conducts business on its behalf. The Audit and Risk Committee (ARC) considers risk management, corporate governance, internal and external audit provision and the compilation of the GLA's Annual Report and Accounts. Reports are submitted to quarterly Board meetings.

The Finance and General Purposes Committee (F&GP) was formed to consider the budgetary control aspects of the GLA's business, its financial performance and to supervise the compilation of the GLA's Corporate and Business Plans. Reports are submitted to quarterly Board meetings.

The Remuneration Committee makes recommendations with regard to the performance management and any remuneration applicable to the Chief Executive. Its members are the same as the F&GP.

There is also a Liaison Group which consists of labour providers and labour users and is chaired by the GLA's Chair. This group reviews the operation of the GLA within the regulated sector from a stakeholder perspective. The group seeks to enhance co-operation between the GLA and its stakeholders, identifying joint areas of interest and the adoption of new policies and strategies. Reports are submitted to quarterly Board meetings.

Board members were nominated from organisations across the associated sectors regulated by the GLA, both industry and government bodies, to represent the full range of views. Their responsibility is to ensure the GLA fulfils its roles and complies with the Gangmasters (Licensing Authority) Regulations 2005.

A full list of members during 2014-15, the organisations they represented and their individual attendance records at Board meetings is detailed below. A public register of interests for Board members is held, and this may be accessed via the GLA's website at [www.gla.gov.uk](http://www.gla.gov.uk).

Meetings are held on a quarterly basis and are open to the public.

### Attendance at GLA Board meetings

Organisation	Representative	Number of meetings attended	Number of meetings eligible to attend
Association of Chief Police Officers <sup>11</sup>	Vacancy	0	4
British Retail Consortium	Catherine Pazderka	3	4
Food and Drink Federation	Angela Coleshill	3	4
Fresh Produce Consortium	Nigel Jenney	3	4
Local Government Association	Cllr Paul Bettison	4	4
National Association of Citizens Advice Bureau	Jane Mordue (deputy chair)	2	4
National Farmers Union	Hayley Campbell-Gibbons <sup>12</sup>	2	4
	Sharon Cross	3	4
National Farmers Union Scotland	Graham Bruce	2	4
Police Superintendents Association	Kieran English (observer)	1	4
Sea Fish Industry Authority	Ivan Bartolo	4	4
Shellfish Association of Great Britain	Gillian Mills	4	4
Association of Labour Providers	David Camp	3	4
	Joanne Young	4	4
The Recruitment and Employment Confederation	Marshall Evans	4	4
Trades Union Congress	Hannah Reed	3	4
	David Gill (observer)	3	4
Unite the Union	Steve Kemp	1	4
	Diana Holland (observer)	4	4

<sup>11</sup> Replaced by National Police Chiefs' Council on 1 April 2015

<sup>12</sup> Maternity leave from 3 October 2014

Ex-Officio Members Department / Organisation	Representative
Secretary of State for Environment, Food and Rural Affairs	Tim Render
Secretary of State for Home Affairs	Jeremy Oppenheim Marcus Starling
Secretary of State for Business, Innovation and Skills	Paula Lovitt the late Gaynor Ithell
Secretary of State for Work and Pensions	Christopher Jennings
The Commissioners of Inland Revenue and the Commissioners of Customs and Excise jointly	Jim Fedigan
The Director General of the Health and Safety Executive	Sarah Jardine
The Minister for Agriculture and Rural Development for Northern Ireland	Colette McMaster
The Scottish Ministers	Gordon Jackson
The Welsh Assembly for Wales	Vacancy
Official Observer	Representative
Ethical Trading Initiative	Peter McAllister

#### Attendance at Audit and Risk Committee

Board Representative	Number of meetings attended	Number of meetings eligible to attend
Jane Mordue (Chair)	2	3
Joanne Young	3	3
Cllr Paul Bettison	2	3
Nigel Jenney <sup>13</sup>	1	1

#### Attendance at Finance and General Purposes Committee

Board Representative	Number of meetings attended	Number of meetings eligible to attend
Angela Coleshill (Chair)	5	5
Hannah Reed	3	5
Marshall Evans	5	5
Nigel Jenney <sup>13</sup>	3	4

No new representative Board member appointments to the GLA Board were made pending revisions to The Gangmasters (Licensing Authority) Regulations 2005. Transitional arrangements were in place while the Board's structure and composition was reviewed.

<sup>13</sup> Nigel Jenney moved from membership of ARC to F&GP in June 2014  
Gangmasters Licensing Authority  
Annual Report and Accounts 2014-15

The governance arrangements of the Board have been changed following the statutory instrument being approved. This provides for the creation of a GLA Board of up to eight independent members plus a Chair. On 27 March 2015 the Home Office announced the names of six members and its intention to appoint a further two members. However, this will be kept under active review until the potential timing of any new agency is clearer. These changes are in line with recommendations made as part of the RTC and Triennial Review. Details of the new board members can be found on pages 6 and 7.

The GLA Board, in consultation with the Secretary of State, appoint a Chief Executive who, with senior managers, ensures the operational objectives of the GLA are delivered. On a monthly basis the GLA records its performance against agreed objectives.

Quarterly performance data is submitted to the F&GP who review and report to the Board.

## Internal Audit

Based on assurances that I have received from our internal auditors I am confident that the GLA is compliant with the Corporate Governance Code with no material exceptions. For the year 2014-15 the internal auditors were Baker Tilly. For 2015-16 onwards this function will be carried out by Home Office internal audit.

## Scope of Responsibility

As Accounting Officer, I have responsibility for maintaining a sound system of internal control that supports the achievement of the GLA's policies, aim and objectives, whilst safeguarding the public funds and departmental assets for which I am personally responsible, in accordance with the responsibilities assigned to me in Managing Public Money.

In preparing my annual Governance Statement for 2014-15 I have incorporated the guidance from the National Audit Office (NAO), HM Treasury DAO (GEN) 02/12, the new Managing Public Money annex 3.1 and have applied the principles set out in the Corporate Governance Code insofar as they are applicable to the GLA.

The system of internal control in use has been subject to regular review by the executive team. The Board are presented with a full risk register annually and have delegated responsibility for monitoring of risk management to ARC. Responsibility for the setting of risk appetite for all strategic risks is delegated to F&GP. The Home Office is represented on both ARC and F&GP and processes are in place for risks to be escalated to and from the Home Office.

I am required to allow the ARC to have complete access to any information to enable them to report to the GLA's Board.

During the reporting period 2014-15 I was obliged to report regularly to the Home Office as well as the previous sponsor, Defra, to satisfy them of the regularity and propriety of expenditure relating to enforcement, the responsibility for which has been delegated directly to the GLA by the Secretary of State.

In addition I ensured that the Home Office Permanent Secretary, the Principal Accounting Officer for the Home Office, was aware of the main risks managed by the GLA through regular reporting to our sponsor team.

## The Purpose of the System of Internal Control

The system of internal control is designed to manage risk to an acceptable level in line with the Board's risk appetite, rather than to eliminate all risk of failure to achieve the GLA's policies, aim and objectives; it can therefore only provide reasonable, but not absolute, assurance of effectiveness.

The system of internal control is based on an on-going process designed to identify and prioritise the risks to the achievement of the GLA's policies, aim and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically. The system of internal control has been in place for the year ended 31 March 2015 and up to the date of approval of the Annual Report and Accounts. This accords with HM Treasury guidance.

## Capacity to Handle Risk

The GLA continues to evaluate on a regular basis the management of risk within the GLA. A general risk management statement has been agreed with the Board to summarise the GLA's approach to risk.

*The GLA operates in an environment that includes criminality and the GLA operations are not without risk. The GLA undertakes inspections and investigations where the process and the final result cannot be predicted. Consequential court cases can be expensive and the duration uncertain. Government funding of the GLA is subject to public expenditure pressures. To fulfil its basic purpose the GLA has to accept a degree of risk: its appetite cannot be universally low.*

*The GLA will be unrelenting in its approach to disrupt labour exploitation in all its forms by any lawful, ethical and cost effective means. Its core aim is to protect vulnerable and exploited workers hence has a low risk appetite towards safety, enforcement and compliance objectives with a marginally higher risk appetite towards its financial and legal obligations, albeit these are still low.*

The risk register is reviewed by the Senior Leadership Team at each meeting. For each risk a Risk Manager is identified. The risk registers are presented to the regular ARC meetings with comment and proposed action, as well as being presented annually in full to the Board. The risk register, management and tolerance levels are then set and reviewed.

During the year the main risks have been:

- Sustainable funding
- The public facing licence application workflow system (LAWS)
- Managing the Machinery of Government Change
- Increased levels of complexity and criminality within the GLA Sector
- Legal challenges to GLA interpretation of the Act, Regulation and conduct

The GLA is grateful to the Home Office for resolving the challenging budgetary issues for 2014-15 and for 2015-16. Moving forward, however, discussions continue to take place, which will be subject to the outcome of the Modern Slavery Act Review of the role of the GLA, as to more long term, sustainable funding models which will more accurately reflect the changing profile of criminal behaviour within the GLA regulated sector.

The most significant risk to operational effectiveness continues to be the public facing IT system (LAWS). The purpose of this system is to ensure that licences are granted to those who meet the standards and that only those who maintain those standards can continue to trade. For some time, LAWS has required a substantial upgrade, hence resource intensive manual workarounds continue to be the only option available until investment is made.

LAWS is the GLA's largest and most complex IT system and will present the greatest technical challenges to being transferred to the Home Office. As a key public facing and core business system Defra and the Home Office continue to work together to mitigate any risks around the transfer of this system or its data to a new system. Significant work has already started around planning for the transfer of IT, involving the GLA as well as both the Home Office and Defra and their main IT contractors.

Due to the nature of GLA business and its statutory duty to protect vulnerable and exploited workers, it is almost inevitable that revocations of existing licences will be the subject of appeal. This is a significant risk facing the GLA and has been a focus of attention and scrutiny in order to mitigate risks and reduce costs.

The GLA's record in defending appeals has been excellent in the current year with a 100 per cent<sup>14</sup> success rate. There were 24 appeals received in 2014-15 (24 2013-14). The GLA has not been the subject of an adverse appeal decision since 2010, underlining its proportionate and legitimate approach based on timely and accurate intelligence.

However, the nature of the revocation and appeals process means there is an inherent risk that decisions could adversely impact on the GLA and even when successfully defended the appeals absorb significant resource and finance.

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<sup>14</sup> Internal data source  
Gangmasters Licensing Authority  
Annual Report and Accounts 2014-15



## Review of Effectiveness

As Accounting Officer, I have responsibility for reviewing the effectiveness of the system of internal control. My review of the effectiveness of the system of internal control is informed by the work of the internal auditors and the senior managers within the GLA who have responsibility for the development and maintenance of the internal control framework, and comments made by the external auditors in their management letter and other reports.

The ARC, on behalf of the GLA's Board, has been diligent in reviewing the effectiveness of the system of internal control. Our external auditors have, to date, issued management letters which identify minor areas of concern and all such issues have been addressed quickly and in detail.

During 2014-15, at the Accounting Officer's request, the internal auditors also considered operational as well as accounting processes, which have historically been subject to significant review by both internal and external audit.

## Risk Environment

During 2014-15 the GLA has continued to work within the financial controls set by the coalition Government. This year has seen delivery of savings under my direction, and I have critically reviewed budgets with the objective of, wherever possible, preserving front line operational services.

There are, however, at the same time increasing demands on the organisation, in terms of volume, complexity and increased criminality and exploitation. In response to this the organisation is increasingly reliant on a risk based approach to target resources.

The GLA has been reliant on temporary additional government funding to address some specific recurrent budget pressures around IT, accommodation and other costs.

This has been resolved for 2015-16. The GLA and the Home Office are exploring other funding models which will ensure greater certainty in the future. The GLA has a balanced budget for 2015-16 but austerity measures mean future years will be ever more challenging. The GLA is responding to these challenges and continues to regularly review risk with both the GLA Board and the Home Office.

As a result of the comprehensive review of the system of internal control, I conclude that there are no significant control issues where corrective action has not been taken.



**Paul Broadbent**  
*Accounting Officer*  
15 June 2015

# Remuneration Report

## Executive Management Board

The composition of the Executive Management Board in the reporting period was as follows:

Paul Broadbent	Chief Executive
Darryl Dixon	Director of Strategy
Nicola Ray	Director of People and Licensing

## Contract Information

### Policy on the Remuneration of Senior Managers

The initial salary packages for all senior managers were set by Defra using a benchmarking process to define comparable packages for the area and the specialist skills required and are in line with Civil Service guidelines. All positions were advertised nationally. Salary information is recorded in the table on pages 46 and 47.

The Chair of the GLA is employed on a contract basis. During the financial year, the Chair, Margaret Beels, received total remuneration of £28,545 (£22,275 2013-14). These costs are included in the staff costs total of £2,888,000 (£2,833,000 2013-14) in note 3 on pages 63 and 64 to the financial statements. Payments of £661 (£737 2013-14) have also been made to the Chair in regard to travel and subsistence.

The Chief Executive, Paul Broadbent, is employed on a three year contract which commenced on 7 January 2013.

### Board Members

No Board member who served during the year received any remuneration. Normal business related travel and subsistence was reimbursed in line with the GLA's policy. This amounted to £4,000 in 2014-15 (£2,000 2013-14).

### Tax Arrangements for Public Sector Appointees

There were no off-payroll engagements as of 31 March 2015 for more than £220 per day and that lasted for longer than 6 months and there were no new off-payroll engagements between 1 April 2014 and 31 March 2015 for more than £220 per day and that lasted for longer than 6 months.

## Policy on the Duration of Contracts and Notice Periods

All senior managers' contracts within the organisation contain a three month notice period which is an appropriate time to allow for a handover period.

## Policy on Performance Related Pay

All GLA staff members, other than casual staff, may qualify for performance related pay (PRP) in addition to basic salaries. The PRP for all staff is set by a Rewards Committee consisting of the CEO and Directors (and the Chair where directors' remuneration is discussed) and considers recommendations from all managers on behalf of their staff regarding bonuses. Bonuses will be awarded subject to individuals meeting agreed objectives in line with the GLA's corporate objectives. All individual performance objectives are determined by a departmental analysis of the GLA's corporate objectives.

## Salary Information (Subject to Audit)

### Remuneration

Payments for PRP amounting to £5,000 (£11,000 2013-14) have been paid to senior managers during 2014-15.

The Chief Executive's PRP is determined by existing arrangements for senior civil servants and is again dependent upon meeting agreed personal objectives.

### 2014-15 Single Total Figure of Remuneration

Senior Manager	Job Title	Salary £000's	Bonus Payments £000's	Severance Payments £000's	Pensions Benefits £000's	Total £000's
Paul Broadbent	Chief Executive	80-85	-	-	-	80-85
Darryl Dixon	Director of Strategy	60-65	5-10	-	7	75-80
Nicola Ray	Director of People and Licensing	35-40	-	-	10	45-50

### 2014-15

Band of highest paid executive disclosed in the financial year 2014-15	80-85
Median remuneration of the workforce (£)	32,899
Ratio	2.58

## 2013-14

### Single Total Figure of Remuneration

Senior Manager	Job Title	Salary £000's	Bonus Payments £000's	Severance Payments £000's	Pensions Benefits £000's	Total £000's
Paul Broadbent	Chief Executive	80-85	10-15	-	-	90-95
Ray Dawson (left 30 June 2013)	Chief Operating Officer	45-50	-	77	(2)	120-125
Darryl Dixon	Director of Strategy	60-65	-	-	3	65-70
Nicola Ray	Director of People and Licensing	35-40	-	-	5	40-45

## 2013-14

Band of highest paid executive disclosed in the financial year 2013-14	90-95
Median remuneration of the workforce (£)	32,367
Ratio	2.86

The GLA are required to disclose the relationship between the remuneration of the highest paid director in our organisation and the median remuneration of the GLA's workforce. The median remuneration is the total remuneration of the staff members lying in the middle of the linear distribution of the total staff, excluding the highest paid director. Total remuneration includes salary, non-consolidated PRP and benefits in kind. It does not include severance payments, employer pension contributions and the cash equivalent transfer value of pensions. The pay multiple ratio is the ratio between the total remuneration of the highest paid director and the median for other staff. The 2014-15 ratio has decreased slightly as compared to the prior year due to a reduction in PRP paid to senior managers.

Other than noted above, no other benefits in kind or compensation were paid to senior managers.

The GLA does not offer any remuneration package which is not in the form of cash.

In 2014-15 no employees received remuneration in excess of the highest paid executive (none 2013-14). Remuneration ranged from £16,000 - £85,000.

## Pension Information

### Civil Service Pensions

Pension benefits are provided through the Civil Service Pension arrangements. From 30 July 2007, civil servants may be in one of four defined benefit schemes; either a 'final salary' scheme (classic, premium or classic plus); or a 'whole career' scheme (nuvos). These statutory arrangements are unfunded with the cost of benefits met by monies voted by Parliament each year. Pensions payable under classic, classic plus, premium and nuvos are increased annually in line with Pensions increase legislation. Members joining from October 2002 may opt for either the appropriate defined benefit arrangement or a good quality 'money purchase' stakeholder pension with a significant employer contribution (partnership pension account).

Employee contributions are salary related and range between 1.5 per cent and 6.85 per cent of pensionable earnings for classic and 3.5 per cent and 8.85 per cent for premium, classic plus and nuvos. Benefits in classic accrue at the rate of 1/80<sup>th</sup> of pensionable salary for each year of service. In addition, a lump sum equivalent to three years initial pension is payable on retirement. For premium, benefits accrue at the rate of 1/60<sup>th</sup> of final pensionable earnings for each year of service. Unlike classic, there is no automatic lump sum, classic plus is essentially a hybrid with benefits for service before 1 October 2002 calculated broadly as per classic and benefits for service from October 2002 calculated as in premium. In nuvos a member builds up a pension based on his pensionable earnings during their period of scheme membership. At the end of the scheme year (31 March) the member's earned pension account is credited with 2.3 per cent of their pensionable earnings in that scheme year and the accrued pension is uprated in line with the Pensions increase legislation. In all cases members may opt to give up (commute) pension for a lump sum up to the limits set by the Finance Act 2004.

The partnership pension account is a stakeholder pension arrangement. The employer makes a basic contribution of between 3 per cent and 12.5 per cent (depending on the age of the member) into a stakeholder pension product chosen by the employee from a panel of providers. The employee does not have to contribute but where they do make contributions, the employer will match these up to a limit of 3 per cent of pensionable salary (in addition to the employer's basic contribution). Employers also contribute a further 0.8 per cent of pensionable salary to cover the cost of centrally-provided risk benefit cover (death in service and ill health retirement).

The accrued pension quoted is the pension the member is entitled to receive when they reach pension age, or immediately on ceasing to be an active member of the scheme if they are already at or over pension age. Pension age is 60 for members of classic, premium and classic plus and 65 for members of nuvos.

Further details about the Civil Service pension arrangements can be found at the website <http://www.civilservice.gov.uk/pensions>.

New Career Average pension arrangements will be introduced from 1 April 2015 and the majority of classic, premium, classic plus and nuvos members will join the new scheme.

Further details of this new scheme are available at <http://www.civilservicepensionscheme.org.uk/members/the-new-pension-scheme-alpha/>

### Cash Equivalent Transfer Values

A CETV is the actuarially assessed capitalised value of the pension scheme benefits accrued by a member at a particular point in time. The benefits valued are the member's accrued benefits and any contingent spouse's pension payable from the scheme. A CETV is a payment made by a pension scheme or arrangement to secure pension benefits in another pension scheme or arrangement when the member leaves a scheme and chooses to transfer the benefits they have accrued in their former scheme. The pension figures shown relate to the benefits that the individual has accrued as a consequence of their total membership of the pension scheme, not just their service in a senior capacity to which disclosure applies.

The figures include the value of any pension benefit in another scheme or arrangement which the member has transferred to the Civil Service pension arrangements. They also include any additional pension benefit accrued to the member as a result of their buying additional pension benefits at their own cost. CETVs are worked out in accordance with The Occupational Pension Schemes (Transfer Values)(Amendment) Regulations 2008 and do not take account of any actual or potential reduction to benefits resulting from Lifetime Allowance Tax which may be due when pension benefits are taken.

### Real Increase in Cash Equivalent Transfer Values (CETV)

This reflects the increase in CETV that is funded by the employer. It does not include the increase in accrued pension due to inflation, contributions paid by the employee (including the value of any benefits transferred from another pension scheme or arrangement) and uses common market valuation factors for the start and end of the period.

### CETV Information (Subject to Audit)

#### 2014-15

Senior Manager	Increase in pension £000's	Real increase in lump sum at age 60 £000's	Value of accrued pension £000's	Related lump sum at age 60 £000's	CETV at 1 April 2014 £000's	CETV at 31 March 2015 £000's	Real increase in CETV £000's
Paul Broadbent <sup>15</sup>	-	-	-	-	-	-	-
Darryl Dixon	0-2.5	0-2.5	25-30	75-80	444	472	5
Nicola Ray	0-2.5	0-2.5	20-25	30-35	287	308	6

<sup>15</sup> Paul Broadbent chose not to be covered by the Civil Service Pension arrangements during the reporting year.

## 2013-14

Senior Manager	Increase in pension £000's	Real increase in lump sum at age 60 £000's	Value of accrued pension £000's	Related lump sum at age 60 £000's	CETV at 1 April 2013 £000's	CETV at 31 March 2014 £000's	Real increase in CETV £000's
Paul Broadbent <sup>16</sup>	-	-	-	-	-	-	-
Ray Dawson	0-2.5	0-2.5	25-30	0-5	491	504	9
Darryl Dixon	0-2.5	0-2.5	20-25	70-75	415	444	1
Nicola Ray	0-2.5	(2.5)-0	15-20	30-35	263	284	2

None of our senior managers are members of the partnership pension scheme.

## Declarations of Interest

Senior Leaders	Declarations of Interest
Margaret Beels, Chair	Directorships: Wispway Properties Ltd Governor: Westminster Kingsway College Trusteeships: Friends of the Connection; and The London Chorus
Paul Broadbent, Chief Executive	Vice Chair: National Business Crime Forum Patron: Crimestoppers Visiting Fellow: Nottingham Trent/Derby University
Darryl Dixon, Director of Strategy	None
Nicola Ray, Director of People and Licensing	None



**Paul Broadbent**  
*Accounting Officer*  
15 June 2015

<sup>16</sup> Paul Broadbent opted out of the pension scheme in 2013-14  
Gangmasters Licensing Authority  
Annual Report and Accounts 2014-15

# Statement of Accounting Officer's Responsibility

Under the Act, the Secretary of State has directed the GLA to prepare for each financial year a statement of accounts in the form and on the basis set out in the Accounts Direction. The accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of the GLA and of its net expenditure, statement of financial position, cash flows and changes in taxpayers' equity for the financial year.

In preparing the accounts, the Accounting Officer is required to comply with the requirements of the Financial Reporting Manual (FRoM) and in particular to:

- Observe the Accounts Direction issued by the Secretary of State, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis;
- Make judgements and estimates on a reasonable basis;
- State whether applicable accounting standards as set out in the FRoM have been followed, and disclose and explain any material departures in the accounts; and
- Prepare the accounts on a going concern basis.

Paul Broadbent was appointed Accounting Officer on 7 January 2013. The responsibilities of an Accounting Officer, including responsibility for the propriety and regularity of the public finances for which the Accounting Officer is answerable, for keeping proper records and for safeguarding the GLA's assets, are set out in the Accounting Officer's Memorandum issued by HM Treasury and published in Managing Public Money.



# The Certificate and Report of the Comptroller and Auditor General to the Houses of Parliament

I certify that I have audited the financial statements of the Gangmasters Licensing Authority for the year ended 31 March 2015 under the Gangmasters (Licensing) Act 2004. The financial statements comprise: the Statement of Comprehensive Net Expenditure, Financial Position, Cash Flows, Changes in Taxpayers' Equity; and the related notes. These financial statements have been prepared under the accounting policies set out within them. I have also audited the information in the Remuneration Report that is described in that report as having being audited.

## **Respective responsibilities of the Accounting Officer and Auditor**

As explained more fully in the Statement of Accounting Officer's Responsibilities, the Accounting Officer are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view. My responsibility is to audit, certify and report on the financial statements in accordance with the Gangmasters (Licensing) Act 2004. I conducted my audit in accordance with International Standards on Auditing (UK and Ireland). Those standards require me and my staff to comply with the Auditing Practices Board's Ethical Standards for Auditors.

## **Scope of the Audit of the Financial Statements**

An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error. This includes an assessment of: Whether the accounting policies are appropriate to the Gangmasters Licensing Authority's circumstances and have been consistently applied and adequately disclosed; the reasonableness of significant accounting estimates made by the Accounting Officer; and the overall presentation of the financial statements.

In addition I read all the financial and non-financial information in the Annual Report to identify material inconsistencies with the audited financial statements and to identify any information that is apparently materially incorrect based on, or materially inconsistent with, the knowledge acquired by me in the course of performing the audit. If I become aware of any apparent material misstatements or inconsistencies I consider the implications for my certificate.

I am required to obtain evidence sufficient to give reasonable assurance that the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

### Opinion on regularity

In my opinion, in all material respects the expenditure and income recorded in the financial statements have been applied to the purposes intended by Parliament and the financial transactions recorded in the financial statements conform to the authorities which govern them.

### Opinion on Financial Statements

In my opinion:

- The financial statements give a true and fair view of the state of the Gangmasters Licensing Authority's affairs as at 31 March 2015 and of the net expenditure for the year there ended; and
- The financial statements have been properly prepared in accordance with the Gangmasters (Licensing) Act 2004 and Secretary of State directions issues thereunder.

### Opinion on other matters

In my opinion:

- The part of the remuneration report to be audited has been properly prepared in accordance with Secretary of State directions made under the Gangmasters (Licensing) Act 2004; and
- The information given in GLA Overview, the Chief Executive's Report and the Management commentary within the Annual Report for the financial year for which the financial statements are prepared is consistent with the financial statements.

### Matters on which I report by exception

I have nothing to report in respect of the following matters which I report to you if, in my opinion:

- Adequate accounting records have not been kept or returns adequate for my audit have not been received from branches not visited by my staff; or
- The financial statements and the part of the remuneration report to be audited are not in agreement with the accounting records and returns; or
- I have not received all of the information and explanations I require for my audit; or
- The governance statement does not reflect compliance with HM Treasury's guidance.

### Report

I have no observations to make on these financial statements.

Sir Amyas C E Morse  
Comptroller and Auditor General  
National Audit Office  
157-159 Buckingham Palace Road  
Victoria  
London  
SW1W 9SP  
9 July 2015

# Financial Statements

## Statement of Comprehensive Net Expenditure for the year ended 31 March 2015

	Note	2014-15 £000's	2013-14 £000's
<b>Expenditure</b>			
Staff costs	3	(2,888)	(2,833)
Travel and subsistence		(241)	(278)
Information technology		(569)	(560)
Marketing		(11)	(9)
Other	4	(668)	(639)
<b>Total expenditure</b>		<b>(4,377)</b>	<b>(4,319)</b>
<b>Income</b>			
Enforcement	5	2,951	2,890
Licence fees	6	612	615
Application inspections		223	226
Other		3	3
<b>Total income</b>		<b>3,789</b>	<b>3,734</b>
<b>Net expenditure</b>		<b>(588)</b>	<b>(585)</b>
<b>Total comprehensive expenditure for the year ended 31 March 2015</b>		<b>(588)</b>	<b>(585)</b>

## Other Comprehensive Expenditure

	Note	2014-15 £000's	2013-14 £000's
<b>Items that will not be reclassified to net operating cost:</b>			
Net gain on revaluation of intangible assets	9	(261)	9
<b>Total comprehensive expenditure for year ended 31 March 2015</b>		<b>(849)</b>	<b>(576)</b>

## Statement of Financial Position as at 31 March 2015

	Note	31 March 2015		31 March 2014 Restated		31 March 2013 Restated	
		£000's	£000's	£000's	£000's	£000's	£000's
<b>Non-current assets</b>							
Property, plant and equipment	8		33		46		81
Intangible assets	9		198		384		536
<b>Total non-current assets</b>			<b>231</b>		<b>430</b>		<b>617</b>
<b>Current assets</b>							
Trade and other receivables	10		97		90		79
Cash and cash equivalents	11		496		709		980
<b>Total current assets</b>			<b>593</b>		<b>799</b>		<b>1,059</b>
<b>Total assets</b>			<b>824</b>		<b>1,229</b>		<b>1,676</b>
<b>Current liabilities</b>							
Trade and other payables	12		(690)		(653)		(911)
Finance lease	12		(20)		(15)		(16)
<b>Total current liabilities</b>			<b>(710)</b>		<b>(668)</b>		<b>(927)</b>
<b>Total assets less current liabilities</b>			<b>114</b>		<b>561</b>		<b>749</b>
<b>Non-current liabilities</b>							
Finance lease	12		(35)		(39)		(57)
<b>Total non-current liabilities</b>			<b>(35)</b>		<b>(39)</b>		<b>(57)</b>
<b>Total liabilities</b>			<b>(745)</b>		<b>(707)</b>		<b>(984)</b>
<b>Assets less liabilities</b>			<b>79</b>		<b>522</b>		<b>692</b>
<b>Reserves</b>							
General reserve			50		468		618
Revaluation reserve			29		54		74
<b>Total reserves</b>			<b>79</b>		<b>522</b>		<b>692</b>



**Paul Broadbent**  
Accounting Officer  
15 June 2015

The notes on pages 58 to 75 form an integral part of the accounts.

## Statement of Cash Flows for the year ended 31 March 2015

	Note	2014-15 £000's	2013-14 £000's
<b>Cash flows from operating activities:</b>			
Net operating cost		(588)	(585)
Adjustments for non-cash transactions:			
Depreciation	8	13	10
Amortisation	9	161	164
Adjustment to the Service Concession Arrangement (SCA)	4	14	28
Finance costs	4	4	4
Credit write back	4	(17)	(14)
(Increase)/Decrease in trade and other receivables	10	(7)	(11)
Increase/(Decrease) in trade and other payables	12	37	(258)
Payments to the consolidated fund which are outside the scope of the GLA's activities		(850)	(835)
<b>Net cash outflow from operating activities</b>		<b>(1,233)</b>	<b>(1,497)</b>
<b>Cash flows from investing activities</b>			
Purchase of property, plant and equipment	8	-	(12)
Purchase of intangible assets	9	-	(32)
<b>Net cash outflow from investing activities</b>		<b>-</b>	<b>(44)</b>
<b>Cash flows from financing activities</b>			
Revenue – GIA	7	1,020	1,270
<b>Total financing</b>		<b>1,020</b>	<b>1,270</b>
<b>Net decrease in cash and cash equivalents in the period</b>		<b>(213)</b>	<b>(271)</b>
<b>Cash and cash equivalents at the beginning of the period</b>		<b>709</b>	<b>980</b>
<b>Cash and cash equivalents at the end of the period</b>		<b>496</b>	<b>709</b>

## Statement of Changes in Taxpayers' Equity for the year ended 31 March 2015

	Note	General Reserve £000's	Revaluation Reserve £000's	Total Reserves £000's
<b>Balance at 1 April 2013 Restated</b>		<b>618</b>	<b>74</b>	<b>692</b>
Net operating cost		(585)	-	(585)
Net gain on revaluation of intangible assets	9	-	(20)	(20)
Grant sponsor Grant-in-Aid	7	1,270	-	1,270
Payment to consolidated fund		(835)	-	(835)
<b>Balance at 31 March 2014</b>		<b>468</b>	<b>54</b>	<b>522</b>
<b>Balance at 1 April 2014</b>		<b>468</b>	<b>54</b>	<b>522</b>
Net operating cost		(588)	-	(588)
Net gain on revaluation of intangible assets	9	-	(25)	(25)
Grant sponsor Grant-in-Aid	7	1,020	-	1,020
Payment to consolidated fund		(850)	-	(850)
<b>Balance at 31 March 2015</b>		<b>50</b>	<b>29</b>	<b>79</b>

# Notes to the Accounts

## 1. Statement of Accounting Policies

These financial statements have been prepared in accordance with the 2014-15 FReM issued by HM Treasury. The accounting policies contained in the FReM apply to International Financial Reporting Standards (IFRS) as adapted or interpreted for the public sector context. Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be most appropriate to the particular circumstances of the GLA for the purpose of giving a true and fair view has been selected. The particular policies adopted by the GLA for the reportable activity are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

### Accounting Convention

These Accounts have been prepared under the historical cost convention, modified to account for the revaluation of property, plant and equipment, intangible assets and inventories.

### Pensions

Past and present employees are covered by the provisions of the PCSPS. Full details can be found on pages 48 to 50 of the Remuneration Report.

### Impending Application of newly issued Accounting Standards not yet effective

There are no impending reporting standards that will impact the GLA.

### Going Concern

The Statement of Comprehensive Net Expenditure for the year shows a deficit of £588,000 and the Statement of Financial Position shows total reserves of £79,000.

The GLA has received confirmation of proposed funding levels until 2015-16, therefore there is no reason to believe future sponsorship and future parliamentary approval will not be forthcoming. It has accordingly been considered appropriate to adopt a going concern basis for the preparation of these financial statements.

### Grant in Aid

GIA utilised for both revenue and capital expenditure is regarded as a finance flow used to support the statutory and other objectives of the GLA and is credited to the general reserve in the year to which it relates on a receipts basis.

## Segmental Reporting

A segment is a distinguishable component of the business that is engaged in providing products or services, which is subject to risks and rewards that are different from other segments, and which are reviewed regularly by senior management. The GLA has two separately identifiable business objectives which are reported under this heading, these being licensing activities and enforcement activities. Under the adoption of IFRS 8 and International Accounting Standards 14 (IAS), it has been necessary to add these to the existing cost recovery analysis.

## Income Recognition

Income has been recognised on an accruals basis with licence fee income scheduled monthly over the annual life cycle according to the date on which the licence was issued, this is compliant with IAS 18.

Income received for both licence fees and application fees are exempt from value added tax (VAT) and are set in accordance with HM Treasury's *Fees and Charges Guide*.

## Financial Assets and Liabilities

The GLA classifies its non-derivative financial asset as loans and receivables. Financial assets and liabilities are recognised at fair value, loans and receivables are then held at amortised cost (the transaction price plus any directly attributable transaction costs).

## Derivative Financial Instruments and Hedging

The GLA does not enter into contracts that use derivative instruments such as interest rate swaps or any other hedging facilities. The GLA seeks to eliminate or minimise its exposure to interest rate and exchange rate risk by not making investments and does not have any contracts denominated in foreign currencies. Trade receivables and payables are not interest bearing and are stated at their amortised cost, which is usually their invoiced amount. Cash at bank and in hand comprises cash in hand and current balances with banks, which are subject to insignificant changes in value. Liquidity risk is managed through the management of GIA funding through the Home Office.

## Property, Plant and Equipment

Plant and equipment is held at depreciated historic cost which is a proxy for fair value. As these assets have a short useful economic life (UEL) and low values, this method represents fair value under IAS 16 and permitted by the FReM. The UEL and residual value is assessed on an annual basis in line with the impairment review.

During the reporting period the GLA was a NDPB of the Home Office but has continued to use IT services of Defra. Defra has entered into a contract with IBM for the supply of IT services, which the GLA has continued to use. The contract is for a term of eight years from February 2010. The contract falls within the scope of IFRIC 12 and is disclosed within the Accounts as a SCA. A lease liability has been included to reflect the capital value of payments to IBM to lease IT infrastructure assets throughout the duration of the eight year contract. A matching asset has been raised to reflect the benefit that Defra will derive from having access to IBM's IT infrastructure assets. Depreciation has been



applied on a straight line basis consistent with Defra's depreciation policy. These IT infrastructure assets, which consist of laptops, servers and hardware, are classed as one tangible SCA under property, plant and equipment.

### Depreciation

Depreciation is provided against tangible fixed assets on a straight-line basis at rates calculated to write off the cost over the expected UEL of the asset over the following periods:

Fixtures and Fittings	1-5 Years
Plant and Machinery	1-5 Years
Information Technology	2-10 Years

### Amortisation

Amortisation is provided against intangible fixed assets on a straight-line basis at rates calculated to write off the cost over the expected UEL of the asset over the following periods:

Software Licence	2-5 Years
Information Technology	2-10 Years

### Intangible Assets

In line with IAS 38, where no active market comparable price exists, intangible assets are valued at the depreciated replacement cost re-valued by the average earnings index, less accumulated depreciation and impairment. Impairment reviews will be carried out at the Statement of Financial Position date on an annual basis.

A prior period error was identified with the calculation of re-valuation of intangible assets. This error has been accounted for retrospectively in the financial statements and dates back to 2010-11. Correction of this error affects prior periods only. The details of this are explained under the prior period adjustment in note 19 on pages 74 and 75.

### Cash and Cash Equivalents

Cash and cash equivalents comprise cash in hand, deposits held at call with banks and cash balances held by the Government Banking Service.

### Leases

In line with IAS 17, leases are identified as finance leases or operating leases. A finance lease is one which transfers substantially all the risks and rewards of ownership to the lessee. An operating lease is a lease other than a finance lease.

The determination of whether an arrangement is or contains a lease is based on the substance of that arrangement. This assessment is based on whether the arrangement is dependent on the use of a specific asset and conveys the right to use the asset. Where substantially all risks and rewards of ownership of a leased asset are borne by the GLA, the arrangement is treated as a finance lease. The GLA currently only has one finance lease relating to IT.

Operating leases and the rentals thereon are charged to the Statement of Comprehensive Net Expenditure on a straight-line basis over the term of the lease.

### Employee Benefits

Under IAS 19 employee benefit costs must be recognised in the period in which it was earned. Therefore, the GLA accrues all allowable untaken leave due at the Statement of Financial Position date utilising the measurement method of the average daily rate per employee.

### Pension Costs

The pension arrangements for the GLA are covered by the Superannuation Act 1972 and reflects benefits for members of the PCSPS. The Superannuation Act provides for defined pension benefits to be met from the consolidated fund and no liability rests with the GLA.

Past and present employees of the GLA are covered by the provisions of the PCSPS. The Scheme is a defined benefit scheme and liability rests with the scheme and not the GLA. Benefits are paid from the Civil Superannuation Vote to which the GLA makes contributions calculated to cover accruing pension entitlement for staff employed. Statements of account for the Scheme are provided by the Cabinet Office Civil Superannuation Resource Account. The PCSPS pension scheme undergoes a reassessment of the contribution rates by the Government Actuary at four-yearly intervals. In respect of defined contribution schemes, the Home Office recognises the contributions payable for the year. See also note 3 on pages 63 to 65.

### Value Added Tax

The GLA is not registered for VAT. VAT is charged to the relevant expenditure category or included in the capitalised purchase cost of non-current assets.

### Domicile Status

The GLA's principal place of business is Nottingham, England.

## 2. Statement of Operating Costs by Operating Segment

In line with HM Treasury's *Fees and Charges Guide*, the GLA is required to operate on a full cost recovery basis. It was agreed with HM Treasury that the GLA would only recover part of the cost of the licensing function. Fees have been set at this level and agreed with HM Treasury.

Significant costs remain subject to change following transition to the Home Office, including general IT and the public facing Licensing System. Costs and fees will be reviewed once this work is finalised.

Function	2014-15			2013-14		
	Licensing £000's	Enforcement £000's	Total £000's	Licensing £000's	Enforcement £000's	Total £000's
<b>Expenditure</b>						
Staff costs	(1,403)	(1,485)	(2,888)	(1,405)	(1,428)	(2,833)
Travel and subsistence	(88)	(153)	(241)	(58)	(220)	(278)
Information technology	(256)	(313)	(569)	(262)	(298)	(560)
Marketing	(6)	(5)	(11)	(5)	(4)	(9)
Other	(311)	(357)	(668)	(277)	(362)	(639)
<b>Total</b>	<b>(2,064)</b>	<b>(2,313)</b>	<b>(4,377)</b>	<b>(2,007)</b>	<b>(2,312)</b>	<b>(4,319)</b>
<b>Income</b>						
Licensing	835	0	835	841	0	841
Other	3	129	132	3	108	111
<b>Total</b>	<b>838</b>	<b>129</b>	<b>967</b>	<b>844</b>	<b>108</b>	<b>952</b>
<b>Net income (expenditure)</b>	<b>(1,226)</b>	<b>(2,184)</b>	<b>(3,410)</b>	<b>(1,163)</b>	<b>(2,204)</b>	<b>(3,367)</b>

This analysis of income satisfies both the Fees and Charges requirements of HM Treasury and the same basis has been used for IFRS 8 Operating Segments, to show the cost of the licensing function.

Following a comprehensive review the cost of the licensing function and HM Treasury guidance cost of the function has been revised upward, (£922,000 originally in 2013-14). Fee levels have remained unchanged since 2009 and income has reduced as certain low risk areas were removed from the regulated sector as part of the RTC.

	Income £000's	Full Costs £000's	Surplus/(Deficit) £000's	Fee Recovery Actual %
Licensing 2014-15	835	2,065	(1,230)	40
Licensing 2013-14	841	2,007	(1,166)	42

## Analysis of Net Expenditure by Programme and Administration Budget

Function	2014-15			2013-14		
	Admin £000's	Programme £000's	Total £000's	Admin £000's	Programme £000's	Total £000's
Staff costs	492	2,396	2,888	589	2,244	2,833
Travel & subsistence	25	216	241	28	250	278
Information technology	68	501	569	76	484	560
Marketing	-	11	11	-	9	9
Other	178	490	668	123	516	639
<b>Gross expenditure</b>	<b>763</b>	<b>3,614</b>	<b>4,377</b>	<b>816</b>	<b>3,503</b>	<b>4,319</b>
Income	(3)	(129)	(132)	(3)	(108)	(111)
<b>Net expenditure</b>	<b>760</b>	<b>3,485</b>	<b>4,245</b>	<b>813</b>	<b>3,395</b>	<b>4,208</b>
<b>Funding</b>	<b>1,496</b>	<b>2,822</b>	<b>4,318</b>	<b>1,456</b>	<b>2,782</b>	<b>4,238</b>
<b>Surplus/(Deficit)</b>	<b>(736)</b>	<b>663</b>	<b>(73)</b>	<b>643</b>	<b>(613)</b>	<b>30</b>

The Consolidated Statement of Comprehensive Net Expenditure is analysed between administration and programme costs. Administration costs reflect the costs of running the GLA. These include both the administration costs and associated operating income.

Programme costs reflect non-administration costs, as well as certain staff costs where they relate directly to service provision. The classification of expenditure and income as administration or as programme follows the definition of administration costs set out by HM Treasury.

For the purposes of cost recovery, expenditure has been analysed by function, as well as category, as below. All costs are allocated on the basis of the GLA's best estimate of the apportionment of costs between enforcement and licensing activities.

### 3. Staff Costs

	2014-15 Total £000	2013-14 Total £000's
Staff salaries including PRP	2,321	2,200
Employee benefits as per IAS 19	1	(8)
Social security costs	194	185
Pension service costs	372	379
Severance	-	77
<b>Total</b>	<b>2,888</b>	<b>2,833</b>

The Chair, Margaret Beels, received total remuneration of £28,545 (£22,275 2013-14). Full details of the senior staff costs are provided within the Remuneration Report on pages 45 to 50. The transition to the Home Office and recruitment of the new Board resulted in an increased number of days being worked in 2014-15.

Temporary administration staff at a cost of £6,000 (£14,000 2013-14) is included within the licensing staff costs, and £2,000 (£1,000 2013-14) is included within the enforcement staff costs. However, this did not increase the average number employed.

Five employees were employed on a fixed term contract during 2014-15 (five employees 2013-14).

A total of £44,400 (£40,000 2013-14) was paid for PRP during the year, £34,600 for licensing staff (£13,000 2013-14) and £9,800 for enforcement staff (£27,000 2013-14). All payments for 2014-15 have been accrued, consistent with previous years.

### Pension Costs

The PCSPS is an unfunded multi-employer defined benefit scheme but the GLA is unable to identify its share of the underlying assets and liabilities. The scheme actuary valued the scheme as at 31 March 2011. Details of the latest actuarial valuation can be found in the resource accounts of the Cabinet Office: Civil Superannuation ([www.civilservice.gov.uk/pensions](http://www.civilservice.gov.uk/pensions)).

To 31 March 2015, employer's contributions of £350,000 were payable to the PCSPS (£358,000 2013-14) at one of four rates in the range of 16.7 to 24.3 per cent of pensionable pay (as per the rates in 2013-14), based on revalorised salary bands on the advice of the scheme actuary.

The contribution rates are set to meet the cost of the benefits accruing during 2014-15 to be paid when the member retires, and not the benefits during this period to existing pensioners.

Employees can opt to open a partnership pension account or a stakeholder pension with an employer contribution. Employer's contributions of £22,000 (£21,000 2013-14) were paid to a panel of appointed stakeholder pension providers.

Employer's contributions are age-related and range from 3 to 12.5 per cent of pensionable pay. Employers also match employee contributions up to 3 per cent of pensionable pay. In addition, employer contributions of £1,200 (£1,100 2013-14), 0.8 per cent of pensionable pay, were payable to the PCSPS in order to cover the cost of future provision of lump sum benefits on death in service and ill health retirement of these employees.

Contributions due to the partnership pension providers at the balance sheet date were nil (nil 2013-14). Contributions prepaid at that date were nil (nil 2013-14).

### Average number of employees (based on FTE)

	2014-15			2013-14		
	Total	Permanent staff	Others	Total	Permanent Staff	Others
Total directly employed	66	61	5	65 <sup>17</sup>	60	5

### Reporting of Civil Services and Other Compensation Schemes Exit Packages 2014-15

There were no exits during 2014-15 (one exit at a cost of £101,000 2013-14).

Redundancy and other departure costs have been paid in accordance with the provisions of the PCSPS, a statutory scheme made under the Superannuation Act 1972. Exit costs are accounted for in full in the year of departure. Where the GLA has agreed early retirements, the additional costs are met by the GLA and not by the PCSPS.

## 4. Other Expenditure

	2014-15 Total £000's	2013-14 Total £000's
Depreciation	13	10
Amortisation	161	164
Adjustment to the SCA	14	28
IBM finance costs	4	4
IBM credit write back	(17)	(14)
Legal costs for Appeals	167	153
Recruitment	11	4
Rent	69	91
Training	23	23
Auditors remunerations		
- External	27	27
- Internal	11	10
Interpreters	24	26
Stationery/postage	13	18
Board expenses	4	2
Board restructure/recruitment	62	-
Legal support enforcement	25	62
Other	57	31
<b>Total</b>	<b>668</b>	<b>639</b>

Vehicle costs have been moved to travel and subsistence £103,000 2014-15 (£90,000 2013-14) and telecommunications moved under IT £58,000 2014-15 (£66,000 2013-14), which mainly relates to broadband and telephone costs.

<sup>17</sup> Previously disclosed as 67 in Annual Report and Accounts 13-14 which was actual headcount  
Gangmasters Licensing Authority  
Annual Report and Accounts 2014-15

In 2014-15 a credit of £48,000 was received on accommodation costs relating to 2013-14.

The remuneration to the NAO in respect of external audit work carried out was £27,000 (£27,000 2013-14).

Legal enforcement costs have been reduced in line with a savings plan and have been reducing year on year since 2012-13.

## 5. Enforcement Income

	2014-15 £000's	2013-14 £000's
Enforcement income for operating activities within Great Britain	2,822	2,782
Additional enforcement income from DARDNI for regional food activity	100	101
Other income	29	7
<b>Total</b>	<b>2,951</b>	<b>2,890</b>

The GLA has a Service Level Agreement (SLA) with the Home Office in order to provide enforcement services within Great Britain. This income is applied for and received on a monthly basis.

The GLA has also issued invoices to the Department of Agriculture and Rural Development (DARDNI) for enforcement activities carried out within Northern Ireland.

In addition a further £15,000 was received by the GLA from external sources to assist with enforcement activity and training fees (£7,000 from a grant 2013-14) and £14,000 for the GLA National Stakeholder Conference which was self-financing (nil in 2013-14).

## 6. Licence Fees

Annual Turnover	Fee Band	New Applications (Inspection and Licence Fees) £	Application Inspection Fee £	Renewal Fee £
£10m+	A	5,500	2,900	2,600
£5-10m	B	4,400	2,400	2,000
£1-5m	C	3,350	2,150	1,200
<£1m	D	2,250	1,850	400

Licence fees are based on gross annual turnover within the sector. Licence fees have been reviewed annually but have remained unchanged since 2009.

Under the Act, the GLA is required to establish a UK wide licensing scheme and create a Public Register for gangmasters who are operating in agriculture, horticulture and shellfish gathering and associated processing and packaging industries. Exclusions to this are set out in the Gangmasters (Exclusions) Regulations 2013.

The number of licences issued was as follows:

#### As at 31 March 2015

	Licences Issued/Renewed	Licence Applications Cancelled	Licence Applications Refused	Licences Revoked	Recognised £000's
Horticulture, agriculture and shellfish	954	78	27	23	612

Following a consultation exercise by Defra, the Government has introduced new exclusions from the GLA licensing scheme (October 2013). Based on a risk based approach and 'earned recognition', licence requirements were removed from a number of areas deemed to be low risk.

#### As at 31 March 2014

	Licences Issued/Renewed	Licence Applications Cancelled	Licence Applications Refused	Licences Revoked	Recognised £000's
Horticulture, agriculture, forestry and shellfish	986	252	20	20	615

## 7. Financing

	2014-15 £000's	2013-14 £000's
Revenue – GIA cash	1,020	1,270

Total non-ring-fenced (cash) GIA approved for the year is £1,296,000 (£1,291,000 2013-14). A ring-fenced (or non-cash) allocation of £200,000 to cover the costs of depreciation was also approved as part of budget setting (£186,000 2013-14). This funding is drawn down on a cash needs basis, hence the variance to amount shown above and in the Statement of Cash Flows for the year ended 31 March 2015.



## 8. Property, Plant and Equipment 2014-15

	Plant and Machinery Total £'000s	Information Technology Total £000's	Fixtures and Fittings Total £000's	GLA Total £000's
<b>At 1 April 2014</b>	<b>7</b>	<b>268</b>	<b>15</b>	<b>290</b>
Additions	-	-	-	-
Adjustment to the SCA	-	-	-	-
<b>At 31 March 2015</b>	<b>7</b>	<b>268</b>	<b>15</b>	<b>290</b>
<b>Depreciation</b>				
<b>At 1 April 2014</b>	<b>3</b>	<b>238</b>	<b>3</b>	<b>244</b>
Charge for the period	1	10	2	13
<b>At 31 March 2015</b>	<b>4</b>	<b>248</b>	<b>5</b>	<b>257</b>
<b>Net book value:</b>				
<b>At 31 March 2015</b>	<b>3</b>	<b>20</b>	<b>10</b>	<b>33</b>
<b>At 31 March 2014</b>	<b>4</b>	<b>30</b>	<b>12</b>	<b>46</b>
<b>Asset Financing</b>				
Net book value owned as at 31 March 2015	3	-	10	13
Net book value leased as at 31 March 2015	-	20	-	20
<b>Carrying amount at 31 March 2015</b>	<b>3</b>	<b>20</b>	<b>10</b>	<b>33</b>
Net book value owned as at 31 March 2014	4	-	12	16
Net book value leased as at 31 March 2014	-	30	-	30
<b>Carrying amount at 31 March 2014</b>	<b>4</b>	<b>30</b>	<b>12</b>	<b>46</b>

Defra has a contract with IBM for the provision of IT services and infrastructure assets. This contract was reframed on 1 February 2010. The contract involves the IT contractor (IBM) supplying an end-to-end outsourced IT service to Defra and its Network Bodies, including the provision of the physical IT equipment. Although the GLA transferred from Defra to the Home Office in April 2014 it has continued to use this contract for IT services and infrastructure assets for the whole of the accounting period.

During the life of the contract, Defra has the right to use assets owned by IBM and IBM are obliged to provide a consistent level of performance as set out in the contract. This includes underlying IT product developments commissioned by Defra.

The contract prices are subject to an annual incremental increase, applied from 1 April. This increase is based on the Consumer Price Index as at the end of January in the previous financial year.

There is flexibility in terms of termination providing the option to end the service or key aspects thereof. The financial penalty for termination is on a sliding scale depending on several factors, including time left on the contract. There are no beneficial entitlements at the end of the contract, although the GLA has the option to purchase specified assets at net book value on exiting the contract. This gives the GLA control of the assets during the life of the contract.

Details of how the contract is accounted for can be found in the Statement of Accounting Policies in note 1 on page 59.

### Property, Plant and Equipment 2013-14

	Plant and Machinery Total £'000s	Information Technology Total £000's	Fixtures and Fittings Total £000's	GLA Total £000's
<b>At 1 April 2013</b>	<b>7</b>	<b>305</b>	<b>3</b>	<b>315</b>
Additions	-	-	12	12
Adjustment to the SCA	-	(37)	-	(37)
<b>At 31 March 2014</b>	<b>7</b>	<b>268</b>	<b>15</b>	<b>290</b>
<b>Depreciation</b>				
<b>At 1 April 2013</b>	<b>2</b>	<b>229</b>	<b>3</b>	<b>234</b>
Charge for the period	1	9	-	10
<b>At 31 March 2014</b>	<b>3</b>	<b>238</b>	<b>3</b>	<b>244</b>
<b>Net book value:</b>				
<b>At 31 March 2014</b>	<b>4</b>	<b>30</b>	<b>12</b>	<b>46</b>
<b>At 31 March 2013</b>	<b>5</b>	<b>76</b>	<b>-</b>	<b>81</b>
<b>Asset Financing</b>				
Net book value owned as at 31 March 2014	4	-	12	16
Net book value leased as at 31 March 2014	-	30	-	30
<b>Carrying amount at 31 March 2014</b>	<b>4</b>	<b>30</b>	<b>12</b>	<b>46</b>
Net book value owned as at 31 March 2013	5	2	-	7
Net book value leased as at 31 March 2013	-	74	-	74
<b>Carrying amount at 31 March 2013</b>	<b>5</b>	<b>76</b>	<b>-</b>	<b>81</b>

## 9. Intangible Assets

<b>2014-15</b>	<b>Software Licence Total £000's</b>
<b>At 1 April 2014</b>	<b>1,914</b>
Addition	-
Revaluation	23
<b>At 31 March 2015</b>	<b>1,937</b>
<b>Amortisation:</b>	
<b>At 1 April 2014</b>	<b>1,530</b>
Charge for the period	161
Revaluation	48
<b>At 31 March 2015</b>	<b>1,739</b>
<b>Net book value:</b>	
<b>At 31 March 2015</b>	<b>198</b>
At 31 March 2014	384
<b>2013-14</b>	<b>Software Licence Restated Total £000's</b>
<b>At 1 April 2013</b>	<b>1,858</b>
Addition	32
Revaluation	24
<b>At 31 March 2014</b>	<b>1,914</b>
<b>Amortisation:</b>	
<b>At 1 April 2013</b>	<b>1,322</b>
Charge for the period	164
Revaluation	44
<b>At 31 March 2014</b>	<b>1,530</b>
<b>Net book value:</b>	
<b>At 31 March 2014</b>	<b>384</b>
At 31 March 2013	536

The intangible non-current assets were restated as explained in note 19 on pages 74 and 75.

The carrying amount of the intangible fixed assets had the revaluation not occurred is £169,000 (£330,000 2013-14).

The net book value of LAWS, the GLA's largest intangible asset was £172,000 (£339,000 2013-14). This asset has an expected life to March 2016. As part of the transition to the Home Office future options around use or replacement of this system are under review.

## 10. Trade Receivables, Financial and Other Assets

	2014-15 £000's	2013-14 £000's	2012-13 £000's
<b>Trade receivables:</b>			
Trade receivables	4	(1)	23
<b>Other receivables:</b>			
Prepayments and accrued income	91	89	54
Other receivables	2	2	2
<b>Total</b>	<b>97</b>	<b>90</b>	<b>79</b>

Intra-Government balances	2014-15 £000's	2013-14 £000's	2012-13 £000's
Balances with other central Government bodies	0	0	0
Balances with Local Authorities, NHS trusts, public corporations	0	0	0
Balances with bodies external to Government	97	90	79
<b>Total</b>	<b>97</b>	<b>90</b>	<b>79</b>

## 11. Cash and Cash Equivalents

	2014-15 £000's	2013-14 £000's
Balance at 1 April	709	980
Net change in cash and cash equivalent balances	(213)	(271)
<b>Balance at 31 March</b>	<b>496</b>	<b>709</b>
The following balances at 31 March were held at:		
Commercial banks and cash in hand	496	709
<b>Balance at 31 March</b>	<b>496</b>	<b>709</b>

## 12. Trade Payables and Other Current Liabilities

	2014-15 £000's	2013-14 £000's	2012-13 £000's
<b>Amounts falling due within one year</b>			
Other taxation and social security	102	50	55
Trade payables	13	34	19
Accruals and deferred income	575	569	837
<b>Total</b>	<b>690</b>	<b>653</b>	<b>911</b>
<b>Finance lease falling due within one year</b>			
Finance lease	20	15	16
<b>Total</b>	<b>20</b>	<b>15</b>	<b>16</b>
<b>Amounts falling after more than one year</b>			
Finance lease	35	39	57
<b>Total</b>	<b>35</b>	<b>39</b>	<b>57</b>
<b>Total All</b>	<b>745</b>	<b>707</b>	<b>984</b>

Intra-Government balances	2014-15 £000's	2013-14 £000's	2012-13 £000's
Balances with other central Government bodies	102	75	121
Balances with Local Authorities, NHS trusts, public corporations	-	-	-
Balances with bodies external to Government	643	632	863
<b>Total</b>	<b>745</b>	<b>707</b>	<b>984</b>

## 13. Commitments under Leases

	2014-15			2013-14		
	Buildings £000's	Vehicles £000's	Other £000's	Buildings £000's	Vehicles £000's	Other £000's
Not later than 1 year	49	74	1	58	69	1
Later than 1 year and not later than 5 years	154	126	-	234	184	-
Later than 5 years	-	-	-	9	-	-
<b>Total</b>	<b>203</b>	<b>200</b>	<b>1</b>	<b>301</b>	<b>253</b>	<b>1</b>

Building lease commitments relate to facilities management charges associated with the proportion of occupation of buildings that are either owned or leased by Defra or specialised properties held on its Statement of Financial Position.

Vehicle leases relate to vehicles secured through Government auctions and provided to home based operational staff, where this provides a more cost effective travel solution to staff using their own or hire vehicles.

## 14. Obligation under Service Concession Arrangement

	2014-15 £000's	2013-14 £000's
Rentals due within 1 year	20	15
Rentals due within 2-5 years	35	39
Rentals due thereafter	-	-
<b>Total</b>	<b>55</b>	<b>54</b>

The SCA relate to the Right of Use asset, as explained in the Statement of Accounting Policies under Property, Plant and Equipment in note 1 on pages 59 and 60.

## 15. Other Financial Commitments

	2014-15 £000's	2013-14 £000's
Not later than 1 year	301	410
Later than 1 year and not later than 5 years	540	1,134
Later than 5 years	-	-
<b>Total</b>	<b>841</b>	<b>1,544</b>

A lease liability has been included to reflect the capital value payments to IBM to lease IT infrastructure assets throughout the duration of the contract, as explained in the Statement of Accounting Policies under Property, Plant and Equipment in note 1 on pages 59 and 60.

## 16. Related Party Transactions

The GLA is a NDPB of the Home Office. The Home Office is regarded as a related party. During the year, the GLA has had a number of material transactions with the Home Office.

In addition, the GLA has had a small number of transactions with other Government departments and other central Government bodies. Most of these transactions have been with:

- The Cabinet Office
- Defra
- DARDNI
- Treasury Solicitors

During the year GIA has been received from the Home Office as disclosed in Note 7 on page 67 along with income for enforcement activities as disclosed in Note 5 on page 66. The GLA had no transactions with the organisations identified by senior managers under the Declarations of Interest.

A formal register of interests is received from senior managers on an annual basis and is included on page 50. Payment to senior managers has been disclosed as part of the Remuneration Report.

During the year, no Minister, senior manager or other related party has undertaken any material transactions with the GLA, the Home Office or any other Government departments.

## 17. Losses and Special Payments

Managing Public Money requires disclosure of losses and special payments by category type and value where they exceed £300,000 in total and for any individual items above £300,000. During the year 1 April 2014 to 31 March 2015 the GLA incurred no special payments (nil 2013-14).

## 18. Financial Assets by Category

The following table shows by category the GLA's financial assets and financial liabilities as at 31 March 2015 and 31 March 2014.

Financial Assets	31 March 2015 £000's	31 March 2014 £000's
Cash and cash equivalents (at bank and in hand)	496	709
<b>Financial Liabilities – at amortised cost</b>		
	31 March 2015 £000's	31 March 2014 £000's
Finance lease	55	54
Trade and other payables	412	393
<b>Total</b>	<b>467</b>	<b>447</b>

## 19. Prior Period Adjustment

The GLA re-values its intangible non-current assets at the end of each reporting period, in line with the requirements of the FReM. There is no active market for GLA intangible non-current assets and so the GLA has selected a suitable index, provided by the Office for National Statistics, to use as the basis for revaluing these assets.

The main reason for the adjustment was that errors were identified in the historic revaluation of intangible assets beginning when new indices were applied following the discontinuation of indices previously used.

The intangible assets should have been fully re-valued using the new indices, based on the asset values at the date of purchase. However the change of indices calculation was incorrectly carried out on the revalued cost. In addition, the accumulated depreciation balance had only been partly revalued using the old indices.

Following the identification of these errors, the revaluations were re-calculated using the appropriate index going back to 2010-11. The result being that intangible assets and revaluation reserve were overstated at the start of 2013-14 by £207,000 with a corresponding adjustment to the net book value of the intangible assets.

The impact of the financial statements of these errors is shown below. (There was no impact on the Statement of Comprehensive Net Expenditure or Statement of Cash Flows.)

#### Statement of Financial Position from 2013-14

	Original £000's	Total Correction £000's	2013-14 £000's
<b>Before/after restatement</b>			
Intangible assets	743	(207)	536
Revaluation reserve	281	(207)	74

#### Statement of Change in Taxpayers' Equity

	General Fund £000's	Revaluation Reserve £000's	Total Reserves £000's
<b>Balance at 1 April 2013</b>	<b>618</b>	<b>281</b>	<b>899</b>
Restatement of intangible assets	-	(207)	(207)
Restated balance 1 April 2013	618	74	692

## 20. Events after the Reporting Date

There are no events after the reporting date.

The GLA's financial statements are laid before the Houses of Parliament by the Parliamentary Clerk for the Home Office. The authorised date for issue is [ ] 2015. The authorising officer is the Accounting Officer, Paul Broadbent.





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