



HM Government

United Kingdom Labour Market Enforcement Annual Report 2023 to 2025

Reporting on the implementation of
recommendations made in the UK Labour
Market Enforcement Strategies for 2023 to
2024 and 2024 to 2025

Director of Labour Market Enforcement
Margaret Beels

November 2025



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Foreword

The Immigration Act 2016 which created the position of Director of Labour Market Enforcement requires the Director:

1. To prepare an annual labour market enforcement strategy, which:
 - provides an assessment of the scale and nature of non-compliance in the labour market and
 - sets out the strategic direction for the three existing labour market enforcement bodies:
 - Employment Agency Standards Inspectorate
 - Gangmasters and Labour Abuse Authority
 - HMRC's National Minimum Wage Team

must be submitted to Home Secretary and the Business Secretary for their approval before publication.

2. To submit to Parliament an annual report on the extent to which enforcement activity undertaken during the year has had an effect on non-compliance.

This report assesses progress with regard to the recommendations made in the 2023 to 2024 strategy and the 2024 to 2025 strategy.

Assessing progress is important to me in helping to understand what has worked and what needs change. It is also important for Parliament to receive accounts of the activities of public bodies which are spending public money.

The strategies were presented in March 2023 and March 2024. After the General Election in July 2024, the 2024 to 2025 Strategy was re-presented to the present Government in November 2024. The Employment Rights Bill (ERB) was introduced in October 2024 and that also marked the start of planning for a Fair Work Agency. This agency will take responsibility for the work of the three bodies within my remit as well as the work done by me and my Office.

The government has a focus on achieving economic growth. It is important that this is combined with ensuring that workers are well treated and properly remunerated and that compliant businesses are not undercut by non-compliant competitors. An engaged and committed workforce will deliver business growth to the benefit of all.

Integral to achieving this is the role of the enforcement bodies. They are all deeply engaged in the setting up of the Fair Work Agency, but their commitment to deliver their respective compliance and enforcement work remains. I recognise and value the expertise and dedication of the enforcement teams across all three bodies, especially against a backdrop of tighter resourcing.

I am grateful too for their collaboration with my Office to help me deliver against my statutory obligations.



Margaret Beels
November 2025

1. Introduction

The Immigration Act 2016 set out the role of Director of Labour Market Enforcement (DLME) with an aim to bring together an assessment of the extent of labour exploitation, and to set strategic priorities for labour market enforcement. The director's remit is to examine the work carried out by the three principal enforcement bodies (EBs):

- National Minimum and Living Wage Enforcement Teams in HMRC (HMRC NMW)
- the Gangmasters and Labour Abuse Authority (GLAA); and
- the Employment Agency Standards (EAS) Inspectorate

The DLME must consider the whole spectrum of labour market non-compliance, ranging from accidental infringement to serious criminality and modern slavery.

The Act requires the director to:

- produce an annual labour market enforcement strategy, for approval by the Home Secretary and the Secretary of State for the Department of Business and Trade
- develop the DLME Information Hub; and
- write an annual report setting out for Ministers how, collectively, the enforcement bodies performed relative to the strategy agreed by Ministers. The Immigration Act 2016 places different obligations on the three bodies regarding implementation of the strategy

1.1 Approach

This annual report is based on 2 labour market enforcement strategies from 2023 to 2024 and 2024 to 2025. These strategies were submitted to government for approval by the end of March 2023 and end of March 2024 respectively. The 2023 to 2024 strategy was published on 24 October 2023, and the 2024 to 2025 strategy was published on 11 November 2024. In both years the LME Board authorised some foundational work to commence on recommendations ahead of publication of the strategy.

The strategies for 2023 to 2024 and 2024 to 2025 followed my thematic approach. These themes are:

- improving the radar picture

recognising the scale and nature of labour non-compliance remains partial; looking at a wider range of sources could be beneficial

- focus on improvement and effectiveness

prioritising compliance and enforcement resources and adopting a more systematic approach to understanding where their interventions work best

- joined up thinking

as well as delivering to their own remits, the EBs, working with other partners from law enforcement and elsewhere, need to take a more holistic approach to tackling issues across the labour market

- engagement and support

better engagement with employers and support for workers will help improve compliance

This annual report accounts for progress against these themes. However, to ensure there is an audit trail, details on all recommendations and scoring to reflect progress made is given in annex A.

Ratings

A five-scale colour coded rating system indicates progress in terms of extent of delivery within the timeframes set in the respective LME strategies:

Implemented	Good progress	Some progress	Little progress	No progress
Blue	Green	Yellow	Amber	Red

Over the period in question, I have sought to enhance the role of the Labour Market Enforcement (LME) Board seeking greater accountability and support to deliver progress with implementing recommendations. I chair the LME Board that meets quarterly and is comprised of senior representatives from the 3 EBs and 2 sponsor departments. My aim has also been to give greater focus and weight to the collective effort to bring about improvements in strategic direction of labour market compliance and enforcement. I am grateful to fellow LME Board members for their support and leadership to help achieve this.

There are 3 factors to be taken into account when assessing the extent to which recommendations have been implemented:

- the EBs and the Office of the Director of Labour Market Enforcement (ODLME) have had to operate under tighter financial constraints, where annual budget allocations have reduced either in money or real terms or both. This has most impacted EAS and GLAA. This, along with higher inflation, has inevitably forced greater prioritisation in compliance and enforcement activities and a consequent reduction in activity in others
- the 3 EBs differ considerably in size: HMRC NMW has around 450 staff, GLAA over 100 and EAS just 30. Scale matters when trying to take forward work in new areas such as integration of artificial intelligence (AI). The enforcement bodies have different access to support services which can affect their ability to respond
- the change in government in July 2024 and the government's Plan to Make Work Pay signalled a much more ambitious direction for employment rights and enforcement. The government's ERB introduced in autumn 2024 includes plans to create a Fair Work Agency (FWA). This is a huge undertaking. It has impacted greatly on the enforcement bodies, sponsor departments and ODLME over the past year as preparations are made to be ready to open the FWA in April 2026. It makes sense therefore that several of my recommendations from the 2023 to 2024 and 2024 to 2025 strategies are adapted in light of the establishment of the FWA

1.2 Structure

Sections 2 to 6 report on progress made on recommendations by the themes described above with an additional section relating to a single enforcement body (SEB) where recommendations, fell outside of these themes.

Section 7, as required in the 2016 Immigration Act, discusses the activities of the DLME Information Hub.

Section 8 provides data, analysis and an assessment of the overall performance of the 3 EBs for the period 2023 to 2025.

Section 9 provides my concluding comments on what has been achieved.

Annex A provides a full list of recommendations from 2023 to 2025 along with progress ratings.

Annex B lists two recommendations from 2020 to 2021 that were still in progress when the 2020 to 2023 annual report was published.

2. Improving the radar picture

2.1 Introduction

Our understanding of the scale and nature of labour non-compliance remains partial.

Over the medium term my office has launched a major research project seeking to fill some of these gaps and provide a fuller and more consistent overall picture of labour market non-compliance. Launched in spring 2022 this project is due to complete in late 2025.

In the shorter term this theme recognises that the enforcement bodies themselves could be doing more to understand the extent of the threat of exploitation that workers are facing. This is fundamental to understanding both the scale and nature of the labour market risk, as well as the experiences of those who are most at risk.

The focus of recommendations made under this theme were:

- mapping enforcement bodies' data: Recommendation 2a and 2b from 2023 to 2024
- collecting data on worker protected characteristics: Recommendation 1 from 2024 to 2025
- improving data flows from stakeholders: Recommendation 3a and 3b from 2023 to 2024 and Recommendation 2 from 2024 to 2025

2.2 Mapping enforcement bodies' data

Recommendation 2a and 2b from 2023 to 2024 and recommendation 1 from the 2024 to 2025 strategy aimed to ensure the enforcement bodies collect, process and share intelligence and other information to help arrive at an improved understanding of labour market risk as well as better informed case level interventions.

HMRC NMW tell us they are working on better visualising and mapping data sources to their activities. Data sharing is generally on an operational basis driven by specific needs.

EAS reports sharing data with bodies like HMRC NMW and GLAA but argues that there is room for the process to be improved. EAS suggests there are still some 'unknown unknowns' regarding the data that HMRC NMW and GLAA have that could be useful for EAS.

GLAA reports good operational data sharing with HMRC NMW with a formal arrangement in place, driven by specific needs and requests. GLAA acknowledged the extensive support HMRC NMW had provided to validate income regularity on licence fees.

The collaboration between these bodies aims to improve data sharing and thus enhance their operational effectiveness. The FWA merger is expected to facilitate better integration and access to each other's data systems and case management tools, ultimately leading to more efficient enforcement and compliance efforts.

2.3 Data collection on protected characteristics of workers

Recommendation 1 from 2024 to 2025 proposed that the enforcement bodies collect more information about the protected characteristics of workers to enable analysis as to whether these create additional vulnerability to exploitation.

Currently, looking across the 3 EBs, HMRC NMW does not collect data on protected characteristics as it is not required for their minimum wage compliance investigations. However, the ERB may change this, granting HMRC NMW the right to collect such data.

EAS says they do not inquire about workers' protected characteristics. EAS do see a linkage that an individual's vulnerability may be influenced by a protected characteristic, but EAS focuses on investigating non-compliant business practices.

The GLAA has been directed by the Minister for Safeguarding to ensure an effective Violence Against Women and Girls (VAWG) lens is applied to their work. GLAA have been working on an initiative to collect data so they can be informed and support workers better, particularly those suffering from violence.

2.4 Improving provision of stakeholder data, intelligence and information

Recommendation 3a and 3b from 2023 to 2024 and Recommendation 2 from 2024 to 2025 looked at ensuring partners are clear on the distinction between different types of information. Increasing the volume and quality of third-party information would help with enforcement and improve the strategic view of risk.

The enforcement bodies have discussed developing a shared understanding of data, information, and intelligence concepts. They report that there is a broad agreement on definitions among the 3 enforcement bodies.

Work taken forward by the enforcement bodies in relation to this recommendation include:

- GLAA has been collaborating with the National Crime Agency (NCA) to develop a common language and definition amongst enforcement bodies around labour exploitation
- GLAA provide useful advice on their webpage on what information they need. In April and May 2023 GLAA developed a series of 6 videos for external parties aimed at, among other things, how to provide good quality information (attracting 1,400 views on YouTube),¹ how GLAA decides what information is relevant (460 views) and what to remember when submitting information (686 views) (GLAA, 2023b)
- EAS manages information and data rather than intelligence. EAS shares information with various stakeholder groups such as trade bodies, NGOs, trade unions, and worker rights organisations but notes that sometimes the information coming into EAS is dated by the time it reaches them. EAS also told us about bespoke training with the Advisory, Conciliation and Arbitration Service (Acas) which led to a spike in relevant queries coming from Acas, indicating effective engagement

¹ as of 22/8/2025

- HMRC NMW has created a short video and a marketing strategy to explain the difference between ‘information’ and ‘intelligence’ in relation to third-party information. HMRC engages with trade bodies and industry groups to share information and requirements, and they have updated their joint webinar with GLAA and EAS to clarify these concepts

The enforcement bodies acknowledge that more could be done to target proactively specific third-party stakeholders with tailored messaging, as the language used by GLAA might differ from that of HMRC NMW and EAS. The updated webinar on information and intelligence is available on HMRC 2025b. I encourage them to explore the vehicles to promote this and the collaboration opportunities for them to work with stakeholders to amplify messaging.

Recommendation 3b was for the enforcement bodies to evaluate and assess the quality of third-party information received, for instance via the online complaint form. HMRC NMW explained they routinely evaluate third party information, but the quality is generally low.

2.5 Summary of progress against recommendations

Table 2.1: Overview of recommendations under improving the radar theme

Year	Rec	Short title	Rating	Lead
2023 to 2024	2	Mapping of EBs data	Some progress	ODLME Enforcement bodies
2023 to 2024	3	Improve quantity and quality of 3rd party information	Some progress	Enforcement bodies
2024 to 2025	1	Improve data on protected characteristics	Little progress	Enforcement bodies
2024 to 2025	2	Shared understanding of data/info/intel terminology	Some progress	ODLME Enforcement bodies

3. Improving focus and effectiveness

3.1 Introduction

In a tight public spending climate, the enforcement bodies need a sharp focus to prioritise their resources and to adopt a more systematic approach to understanding where their interventions work best. The key aim of this theme is maximising the impact of compliance and enforcement interventions with available resources. This theme promotes value for money assessments, understanding what initiatives work best, and exploring opportunities to do things differently and better.

The focus for these recommendations were:

- improving measurement of impact: Recommendation 4a and 4b from 2023 to 2024 and Recommendation 4 from 2024 to 2025
- Enforcement Bodies' Strategic Collaboration Plan: Recommendation 5 from 2023 to 2024
- communicating activity: Recommendation 3 from 2024 to 2025
- risks and opportunities from new technologies (AI): Recommendation 5 from 2024 to 2025

3.2 Improving measurement of impact

Recommendations 4a and 4b from 2023 to 2024 were to build the necessary capacity and capability to learn from compliance and enforcement interventions, with a particular focus on developing robust approaches to measuring impact of compliance-based activity. Recommendation 4 from 2024 to 2025 reinforced the need for better impact metrics, drawing on wider expertise where available.

I recognise that the three enforcement bodies are different in size and have different levels of analytical ability in their teams and analytical support they can utilise within the wider departments.

HMRC NMW has a number of mechanisms to help measure impact and provide reassurance that their interventions are well targeted. These include:

- A repeat visit programme to previously non-compliant employers any time between 6 months and 5 years after the initial breach. HMRC NMW has undertaken around 100 follow-up visits each year over the period 2023-25, with around 10% of this finding non-compliance. This is significantly below a 'strike rate' of around 40% found across all their cases suggesting an improvement among these employers
- The National Minimum Wage Geographical Compliance Approach (GCA) is a new compliance approach to risk-based enforcement activity using geography or sector to target those who may be at risk of paying, or receiving, below NMW or National Living wage. There is ongoing testing of the GCA to assess the effectiveness of interventions to change employer behaviour. This is complemented by analysis of HMRC's Real Time Information which highlights changes in pay among employers by geographic area. HMRC also undertook and published an extensive independent evaluation of their GCA (HMRC, 2025). Not only did this demonstrate the success of the GCA approach, but this research also provides an invaluable template for measuring the impact of compliance-based interventions.

HMRC NMW have therefore made clear and commendable progress in this area.

EAS are by far the smallest organisation and currently do not have capabilities to analyse data and evaluate impact, aside from metrics such as revisit rates and feedback. EAS aspires to become a more data-led organisation by analysing their operational data to identify trends and optimise approaches.

GLAA tracks operational metrics but has not had the capacity to link these outputs to higher-level impact measures, such as reductions in the prevalence of labour exploitation after interventions. This is something the GLAA is exploring for future reporting.

In both cases, EAS and GLAA, resourcing pressures may well hinder investment in the necessary capability to take forward much-needed work around measuring impact. There also appears to have been little or no expert support either requested by the EBs or provided by their respective sponsor departments.

Sharing learning across bodies may be easier once consolidated under the FWA, including ideally a stronger central analytical function to support this work.

3.3 Strategic Collaboration Plan

Recommendation 5 from 2023 to 2024 asked the enforcement bodies to produce a Strategic Collaboration Plan, mapping areas of responsibility and interest across the labour market.

The 3 EBs delivered a Strategic Collaboration Plan to the LME Board in 2023 as per the recommendation. The Plan set out a joined-up approach among the enforcement bodies which would result in:

- a better understanding of each other's compliance plans over the next three years
- a deeper understanding of sector structures and business models
- more timely and efficient referrals between the bodies
- exploiting opportunities to learn from one another, sharing methodologies and best practice

- an early warning system for new or increasing risks, building on the work of DLME's Strategic Co-ordination Group (SCG)²
- best use of available data within the restrictions of legal gateways

Since then, the 3 EBs report they meet regularly (usually quarterly) to discuss a variety of strategic and operational issues. ODLME is not invited to these meetings, but I am informed there is now a practice of sharing annual work plans and aligning activities through these joint meetings. On request, readouts have periodically been shared with the LME Board.

Beyond this, EAS reports regularly meeting with other enforcement bodies to discuss and share their work, noting the value they bring in helping to identify opportunities to coordinate efforts across law enforcement areas.

While the sharing of individual plans between the enforcement bodies is very helpful, I would have liked to have seen more done to build on the original strategic collaboration plan. The EBs have different remits and are different sizes. Where GLAA is intelligence led, HMRC NMW is complaints led. The bodies report little cross over operationally, but where there is, they work together.

3.4 Communicating activity

Recommendation 3 from 2024 to 2025 encouraged the EBs to do more to promote their work and to showcase their successes both with compliance and enforcement interventions and to use this to help strengthen the deterrence effect of their work.

The official communication channels have been more of a challenge for the EBs who do not have independent websites, namely HMRC NMW and EAS. Previous LME strategies have highlighted this (DLME 2023b; DLME 2024a).

HMRC NMW reported it uses various communication methods to spread messages about minimum wage compliance and enforcement activities. These include letters and communications to employers and workers, webinars (including joint webinars with GLAA and EAS), content for industry and trade bodies' communications, engaging local business support groups, attending recruitment fairs and expos, and working with education and careers organisations. However, they face challenges in reaching some audiences effectively.

Although publication of their evaluation on the geographical compliance approach (section 3.2) was welcome, opportunities remain to publicise HMRC NMW's other work to provide reassurance to compliant employers that necessary enforcement action is being taken while also enhancing the deterrence effect for those who are non-compliant. For instance, it would be good to see greater publicity around the increased use of minimum wage prosecutions and more frequent Naming Rounds. Employers found to be non-compliant with the minimum wage are publicly named via a press release from the Department for Business and Trade (DBT) (see section 8). The naming process is undertaken by DBT.

EAS report being given permission to highlight the work that HM Treasury, HMRC and DBT did on umbrella companies including a checklist of what good looks like. EAS reported that a one off use of a personal LinkedIn account publicising work on umbrella companies generated a huge response, highlighting the potential for leveraging through social media channels. But again, limited opportunities exist for EAS to showcase its work and impact on social media and online channels.

² The Strategic Coordination Group (SCG) is facilitated by ODLME to bring together operational and strategic expertise from HMRC NMW, GLAA and EAS, alongside other partners.

The GLAA, with its greater independence and own website, demonstrates what can be done to communicate its work and achievements. For example, the latest press page showcases GLAA work and a platform to promote other organisation's initiatives such as educational videos for the care sector, the Just Good Work app, LME publications and National Inclusion Week (GLAA, 2025a) .

It is hoped that the FWA communications team will consider ways to equip the FWA to utilise social media and wider communications more easily.

3.5 Risks and opportunities from new technologies

Recommendation 5 from 2024 to 2025 looks to understand how the EBs are keeping up with the use and threat of new technologies, both to identify new areas of labour market risk but also to employ innovative solutions to tackle threats.

Artificial intelligence (AI) is increasingly a central topic of public debate. AI holds the promise of both threats and opportunities in the world of work and beyond.

My recommendation in 2024 to 2025 was intended to encourage the EBs to embrace these recent technological developments to understand the emerging threats AI may pose to workers, as well as learning how to make use of AI tools in their daily work. This could be either in the regulatory and enforcement sphere (for instance, to improve customer services or a tool to help identify and crack labour market non-compliance) or more generally to help make their work more efficient.

At this stage, recognising the general lack of internal AI expertise, the emphasis should remain on learning from others to then inspire further work within the bodies themselves.

Resources such as the government's AI.Gov.Hub (part of the Department for Science, Innovation and Technology (DSIT)) showcase AI from across central and local government. Other government departments and regulators are also taking forward important work involving AI, such as HMRC and the Department for Work and Pensions (DWP) using AI in the fight against tax and benefit fraud respectively. In addition to this there are good early examples from policing where AI tools have been used effectively as part of investigatory work (Sky News, 2024), (TOEX, 2025).

HMRC NMW has been exploring the use of AI to extract information automatically from payroll records, offering significant time-saving benefits. They have also been exploring using AI to improve customer services and interfaces to help workers and employers. For example adding a chatbot to their complaint portal – though this requires significant verification process due to concerns around customer data privacy and security.

EAS acknowledge the need for government and enforcement bodies to leverage AI and modern technology more effectively for tasks like law enforcement and detecting non-compliance. EAS face challenges in understanding how to apply AI tools for their work and suggested that the government and the incoming FWA need expertise on applying AI for law enforcement purposes. EAS are looking at AI tools for automating administrative tasks but found them inadequate compared to EAS' own process automation efforts. EAS have seen benefits of moving towards digital efficiencies with frontline staff having iPads. This has saved time by removing duplication of tasks.

GLAA are exploring potential uses of AI but do not have extensive or advanced AI capabilities yet. They are procuring a new AI reporting tool from the Government Internal Audit Agency that will automate and standardise report writing for compliance officers after inspections, delivering efficiencies. GLAA also reported their operational teams received training on online scams.

All 3 EBs have benefited from the wider rollout across sponsor departments of Microsoft Co-pilot, which is realising efficiencies generally in their day-to-day work (GDS, 2025).

Overall, there remains a lot of scope for progress with respect to AI, especially given the government's wider ambition for a modern digital government. Access to resources is an issue but equally this in an investment area to drive forward efficiencies. I would expect the FWA to recognise the need for more work in this space and my office will continue to provide whatever assistance it can in the interim.

3.6 Summary of progress against recommendations

Table 3.1: Overview of recommendations under improving focus on effectiveness theme

Year	Rec	Short Title	Rating	Lead
2023 to 2024	4	Understanding and methodology of learning from compliance and enforcement interventions	Some progress	ODLME Sponsor departments Enforcement bodies
2023 to 2024	5	Enforcement bodies Strategic Collaboration Plan	Good progress	Enforcement bodies
2024 to 2025	3	Enforcement bodies new and shared communications vehicles	Good progress	Enforcement bodies
2024 to 2025	4	Greater focus on metrics to demonstrate impact	Some progress	Enforcement bodies
2024 to 20/25	5	Implications and usage of AI in enforcement work	Some progress	ODLME

4. Better joined-up thinking

4.1 Introduction

As well as delivering to their own remits, the EBs, working with other partners from law enforcement and elsewhere, need to take a more holistic approach to tackling issues across the labour market. Some of this work is facilitated by ODLME's Strategic Coordination Group (SCG).

The emphasis is for there to be deeper collaboration both within my area of responsibility and more broadly with other law enforcement agencies. This applies to both intelligence sharing and operations but also to wider (systems) thinking and designing policy to minimise unintended consequences.

This chapter considers work my office and the EBs have been doing either in response to specific sector threats (e.g. adult social care) or more generally to collaborate better for the future. It also considers what can be done in the policy design process to avoid unintended consequences of labour exploitation and how worker welfare can be assured once lessons have been learned.

The focus of these recommendations was around:

- responding to urgent threats in adult social care: Recommendation 11 from 2024 to 2025
- ensuring worker welfare under the Seasonal Worker Visa scheme: Recommendation 7 from 2023 to 2024
- anticipating unintended policy consequences: Recommendation 8 from 2023 to 2024
- addressing other sector-specific threats: Recommendation 6 from 2023 to 2024
- improving interfaces between the enforcement bodies: Recommendation 10 from 2024 to 2025

4.2 Adult social care – Health and care visa

Recommendation 11 2024 to 2025 focused on assessing the joint approach associated with tackling labour market non-compliance in the adult social care sector.

That recommendation was largely driven by the marked increase in EB activity responding to reports of labour exploitation in the sector. The LME Strategy for 2020 to 2021 had already highlighted the need for greater join-up among the key stakeholders in adult social care across the UK (DLME, 2021). I reported on progress on implementing most of these in my Annual Report for 2020 to 2023 (DLME, 2024c). One issue relating to the LME enforcement bodies strengthening

their relationship with care regulators across the devolved governments³ remained outstanding (Recommendations 1a, 1b and 1c, 2020/21). I provide an update on this (see also Annex B for the full wording of the recommendation).

In the care sector, the increasing demand from an ageing population and the difficulty in finding a sustainable funding model to ensure universal quality care placed immense pressure on the sector. Pay for care workers was barely above the National Living Wage, and vacancy rates were high. The sector relies heavily on international workers. Following Brexit, reduced access to labour from the EU led to the introduction of the Health and Social Care Skilled Work Visa in 2022. This resulted in a sharp increase in carers recruited from overseas, but also a rise in labour non-compliance, including illegal recruitment fees, debt bondage, wage underpayment, and other forms of labour exploitation. Additionally, the abuse of the Student Visa route exacerbated the problem, with some students working in excess of their permitted hours or switching to the care worker route to circumvent stronger controls.

The adult social care sector therefore remains a priority sector for me due to the high risk of labour market exploitation as well as the importance of this sector in delivering support to vulnerable people. The sector is complex, involving many stakeholders and enforcement bodies, making any response to issues within the sector challenging.

All EBs have dealt with a substantial number of cases in the adult social care sector. For EAS and GLAA, the number of reports of exploitation in this sector substantially increased following the extension of the health and social care visa to include care workers in 2022. For HMRC, around 10% of their open case work has been in the adult social care sector.

Due to the complex nature of the care sector, joint working with a wide range of stakeholders is vital to effectively tackle labour market exploitation. I therefore included a recommendation in my 2024 to 2025 strategy to undertake a review of the joint working that has happened in this sector.

There are some great examples of successful joint working in the sector. For example, EAS now assures any potential new recruitment businesses applying to join the NHS Employers ethical recruiters list. This provides a level of assurance that any employment business applying is complying with the minimum standards that UK legislation and regulation require. Any business applying to the ethical recruiters list also agrees that EAS and Department of Health and Social Care (DHSC) will share information should concerns arise about behaviour, providing a more comprehensive on-going compliance system.

In 2024 to 2025, GLAA colleagues investigated an agency supplying workers to the care sector. The investigation discovered that the agency was also operating within GLAA regulated sectors without a GLAA licence. Concerns were raised about the financial exploitation of workers and a serious disregard for their wellbeing. GLAA coordinated a multi-agency approach leading to the agency's directors being issued with a Labour Market Enforcement Undertaking (LMEU) outlining the necessary steps to restore and maintain compliance with key employer legislation and being served an enforcement notice for offences for engaging as an unlicensed labour provider.

HMRC NMW continue to manage a steady number of NMW cases within adult social care. They have undertaken a range of projects with stakeholders to promote compliance. For example, in 2020 they worked with Unison union to deliver a guide for workers on YouTube advising them of their rights and signposting them to help and support. In 2022, HMRC NMW worked with the Care Quality Commission (CQC) to send educational letters to all those registered with the CQC as delivering homecare.

3 Social care is a devolved matter in Scotland, Wales and Northern Ireland and each has its own regulators for the sector (see section 4.1.4 of DLME, 2021)

My Annual Report for 2020 to 2023 (DLME, 2024c) gave a progress update on the work the EBs had undertaken to build stronger relationships with the care regulators such as CQC and their equivalents in the devolved administrations. At the time, all 3 EBs reported having established good working relationships with these care regulators, thus helping to raise their profile (Recommendation 1a, 2020 to 2021). Since then, there has been further engagement between the EBs – and indeed my office too – with the devolved governments and care regulators. Although both HMRC NMW and GLAA had carried out some training of CQC inspectors, there is no evidence to suggest that any similar training had taken place with regulators in the devolved administrations (Recommendation 1b, 2020 to 2021). Furthermore, there is only limited evidence of intelligence sharing between EAS and the authorities in Northern Ireland. HMRC NMW had reported that their legal gateways prevented greater sharing of intelligence with care regulators (Recommendation 1c, 2020 to 2021). I am told by the devolved governments that they would still welcome greater visibility of data and information on the issues the enforcement bodies are continuing to find in the sector.

The report to the LME Board assessing joint working in the ASC is delayed but underway. It will be able to report good examples of joint working, but that there remains further work to be done to establish a formal process for joint working. In addition, greater tie up between the EBs through the FWA should help to create a more structured means of tackling these problems, encouraging compliance and working in a more coordinated approach with other stakeholders.

4.3 Agriculture – Seasonal Worker Visa

Recommendation 7 2023 to 2024 was for ODLME to work closely with government and other stakeholders to facilitate a more joined up approach to the welfare of workers in the Seasonal Worker Visa (SWV) scheme, raise awareness of workers' rights and strengthen intelligence in this sector to respond to emerging threats. Relevant to this, also, is Recommendation 6 from my predecessor's 2020 to 2021 strategy that was still live at the time I submitted my Annual Report 2020 to 2023 in December last year. This urged GLAA to work closely with – and lend credibility to – industry initiatives and certification schemes to help improve compliance throughout the supply chain (see Annex B).

International labour has been the primary source for seasonal work in agriculture for decades. Since the end of the free movement of European Union (EU) nationals into the UK, the Seasonal Worker Visa scheme operators shifted their sourcing of labour from eastern to central Europe, and with the conflict in Ukraine, further towards Central Asia, Nepal, and Indonesia. This led to a scramble for labour from over 60 countries, including those with inadequate safeguards in recruitment processes. Reports of workers being charged unlawful recruitment fees and excessive amounts for visa applications and travel costs emerged. This issue led to the removal of licences from some labour providers and scheme operators. Monitoring and enforcement were fragmented, creating gaps that increase the risk of worker exploitation.

Since 2023 there has been much greater collaboration between stakeholders across this sector, facilitated initially by the efforts of my office to help convene engagement between the interested parties. I am pleased to see that this has now developed such that there is much more constructive and sustained collaboration between government, NGOs and the sector more broadly. For instance, the Department for Environment, Food and Rural Affairs (Defra) reports that it is now working with the Seasonal Worker Taskforce. This is a group comprising industry trade bodies, retailers, growers, recruiters and not for profit organisations who came together in March 2023 to identify measures to reduce risks to workers from visa, travel and other related costs. I have been very encouraged by the work of the StrongerTogether Taskforce and how the sector as a whole has been pro-active in working together to make improvements to seasonal working in agriculture. However, GLAA's direct involvement has been limited.

NGOs operating in this sector such as the Worker Support Centre (funded by the Scottish government) have done excellent work to support workers and to ensure there is a better-informed picture of worker welfare (Worker Support Centre, 2025). The Stronger Together Seasonal Worker Taskforce has several workstreams to support workers. One conducts independent quarterly surveys of farm workers, invaluable for providing timely intelligence (Stronger Together, 2025).

Defra's own annual surveys (Defra 2025a, 2025b, 2025c, 2025d) of seasonal workers between 2021 and 2024 suggest significant improvements in the scheme. According to the 2024 Defra survey almost all respondents (94.2%) reported they had a 'positive' or 'extremely positive' experience working in the UK, and 96.9% expressed a desire to return to the UK through the Seasonal Worker Visa route. Over three quarters of respondents (81.8%, or 10,259 responses) stated they knew how to raise a complaint. A small proportion (2.0%, accounting for 245 responses) stated that they had raised a formal complaint. 19.3% of respondents (2,427 responses) stated they had requested a transfer to another farm, with the most significant reasons being the lack of hours on their current farm (38.5% or 929 responses) and to be with friends (22.2% or 535 responses).

Since 2023, teams of inspectors from UK Visas and Immigration (UKVI) have visited over 300 farms and interviewed more than 2,300 international workers to achieve a better in-year picture. UKVI told us they believe the majority of the serious labour exploitation issues in the SWV have been addressed, mainly finding lower-level non-compliance with minor breaches. (Recommendation 6 2020 to 2021) sought GLAA support for those elements of industry certification schemes (for example, Red Tractor) that contribute to raising labour standards and compliance. The second element of the recommendation referred to strengthening the licensing system such that greater reliance could be placed on the licence with less need for multiple independent compliance audits. In the last 2 years GLAA has focused on strengthening the licensing system where it has made good progress. It is too soon to see what the impact of this has been on industry standards or the need for independent audits. I am not aware of GLAA involvement in supporting grower certification schemes.

4.4 Anticipating unintended policy consequences

Recommendation 8 from 2023 to 2024 was intended to explore what could be done to help mitigate risks of labour exploitation earlier in policy design and implementation processes.

The experiences of adult social care and agriculture discussed highlight the risks of unintended consequences of not getting the policy design and or its implementation right. Policy development in government inevitably spans interests of more than one ministerial department and to a large degree discussions between officials can anticipate and address these. However, in the case of the extension of the health and social care visa to care workers, it was clear insufficient time and attention were given to the potential adverse consequences on the workers themselves. The costs of this have been mistreatment of vulnerable workers and added strain on limited enforcement resources.

My 2023 to 2024 strategy recommendation here was an attempt to find a better way of planning policy initiatives to ensure that worker exploitation risks are anticipated as far as possible before new policies are rolled out.

The examples demonstrate the risk for migrant workers from abroad and argue for a focus for change on the terms of international recruitment and the safeguards.

I can report on two developments where I believe improvements are being made.

First of all, the government's proposed housebuilding programme will see a marked increase in demand for construction workers as well as for those working in the construction materials supply chain. The government has announced plans to train 60,000 additional skilled construction workers. Should this need to be supplemented by the recruitment of construction labour from overseas, careful thought and preparation will be required to design and implement an appropriate worker visa scheme, where risks to labour exploitation are fully considered.

Recognising these potential risks, my 2025 to 2026 strategy included a recommendation for law enforcement stakeholders to produce an engagement, coordination and action plan with central government, local authorities and industry, expanding on current initiatives to mitigate the risks of exploitation. Initial work is already underway, and I have been encouraged by the industry itself giving this issue priority and developing initiatives to help address labour exploitation risks.

Secondly, the Migration Advisory Committee (MAC) will have a stronger focus on exploitation risks as part of its advice to government around the need for, and operation of, immigration routes. Following publication of the government's Immigration White Paper in May 2025, future work migration routes will be subject to scrutiny by a new Labour Market Evidence Group (LMEG), comprised of representatives from the Industrial Strategy Council, the Department for Work and Pensions, Skills England (and its equivalents across the Devolved Nations) and the MAC itself. I have had positive discussions with the MAC Chair, Brian Bell, indicating that concerns around labour exploitation risks will be amplified in this group.

4.5 Improving joint working among the enforcement bodies

Recommendation 6 2023 to 2024 sought to improve how the ODLME's Strategic Coordination Group (SCG) promote further joint working of intelligence sharing, operations and evaluation.

4.5.1 Strategic Coordination Group (SCG)

The SCG was set up in 2017 and facilitated by my office to bring operational and strategic expertise from HMRC NMW, GLAA and EAS. The Health and Safety Executive (HSE), Department of Work and Pensions and the National Crime Agency also attend. Its role is to identify potential joint enforcement activity involving the three enforcement bodies, and address areas for closer cooperation. It also facilitates operational delivery by co-ordinating activity from cross agency operations and learning lessons from these. More partners have joined and in the last couple of years, UK Visa and Immigration, and the Security Industry Authority have become members.

My role does not extend to directing the bodies at an operational level. Rather, it is to provide strategic recommendations to which the bodies must have regard. Thus, the bodies maintain operational primacy in terms of their enforcement responsibilities, meaning that each of the bodies retains full oversight of their cases, operations and outcomes.

Over time there have been two large joint operations: Operation Tacit (2020 to 2022) in the garment sector in Leicester; and Operation Topaz in the adult social care sector (2022 to 2024). The SCG has further supported NCA led operations focussing on construction and adult social care (known as Aidant).

Given the scale and profile of Operation Tacit, I initiated a review to evaluate this intervention in May 2023 (DLME, 2023a). This review sought to understand the circumstances leading to up to the operation, the roles of stakeholders, the compliance and enforcement approaches used, and the impact the operation had on finding and tackling labour exploitation in the Leicester garment sector. Crucially, the objective of the review was also in part to learn lessons to inform future sector and location-focused multi-agency enforcement interventions. The findings from the review were instrumental in helping to design the approach to the subsequent Operation Topaz in the adult social care sector. My review of Operation Tacit is due to be published in autumn 2025.

Beyond this, the majority of joint working and intelligence sharing is more on a local and informal basis and recognises that the 3 EBs have their own priorities. These priorities do not always align to support joint working. Where there are strategic priorities as set out in my strategy, the enforcement bodies look for opportunities to join up and work together and bring in other government partners.

The SCG supports joint activity across the EBs and the wider group members. For both the large-scale operations of Tacit and Topaz, the SCG convened and was engaged with plans to take forward and address those particular risks. Work in the hand car wash sector continues due to the ongoing threat of non-compliance. In the last year HMRC NMW have developed a new approach to tackling non-compliance which has included working with other members of the SCG.

Despite the two main operations and the ongoing sharing of intelligence between a variety of enforcement partners, it remains disappointing that the 3 EBs, either through the SCG or not, have not done more in terms of joint operational activity, especially in sectors identified perennially as high risk, such as construction. Lack of activity is arguably due to factors such as individual EB incentives (that is, to focus and report only or mainly on their own remit) and the absence of a systematic approach to joint working, sometimes relying instead on key enforcement personnel to demonstrate the leadership required to take concerted action faced with the bigger picture.

Equally disappointing has been the lack of any progress made around evaluation by the EBs of joint operations and the impact they have had. This may be partly due to the fact that the EBs are separate, but also not having access to all the intelligence, data and case information. I hope this can be overcome within the FWA.

4.5.2 Developing closer ways of working

Recommendation 10 2024 to 2025 was designed to consider how the EBs can build a better understanding of how each other operates and identify where best practice can be shared.

Beyond the sharing of intelligence and plans between the bodies through joint meetings, I believe there is value in mutual understanding as to how the 3 EBs operate on a day-to-day basis.

I recognise that the EBs have distinctly different remits and approaches to compliance and enforcement. There are also huge differences in their relative sizes. But there are common factors. They all need to reach out to businesses and workers; they conduct reactive investigations and respond to worker complaints. I believe they could learn more from each other's approaches.

Deeper integration and staff exchange between agencies, as envisioned in the strategy recommendation, did not happen in 2023 and 2024. Whilst the EBs worked together through webinars and joint operations, there was no staff secondment programme implemented during that period. Secondments of people working in civil society to the Greater London Authority over many years have proven successful (Trust for London, 2025). This sort of approach might be something for the FWA to explore in the future.

Beyond this, for EAS cases, HMRC NMW has designated teams that liaise closely with EAS to build collaboration and provide support and advice to each other. As part of the GCA, HMRC NMW works jointly with EAS, sharing information about employment agencies in those locations and having joint employer support calls with HMRC NMW case workers and EAS representatives.

EAS has also conducted training with GLAA contact centre staff to educate them on the types of cases relevant to EAS. In return, the GLAA have provided training to EAS staff to explain their work.

There is no evidence of systematic learning from each other or transferring best practice. One opportunity could be with the techniques and processes used by the HMRC NMW Geographic Compliance Approach, which has been a real area of success. I would hope that both EAS and GLAA could learn much from this.

4.6 Summary of progress against recommendations

Table 4.1: Overview of progress against recommendations under the joined-up thinking theme

Year	Rec	Short Title	Rating	Lead
2023 to 2024	6	SCG sectoral approach; strategic plans and operational approach to tackle threats and understand impact of interventions	Little progress	SCG Enforcement bodies
2023 to 2024	7	SWV join up to raise awareness and strengthen intelligence	Good progress	ODLME
2023 to 2024	8	Reduce unintended consequences of new policy on workers	Some progress	ODLME Sponsor departments
2024 to 2025	10	Improving interfaces between the enforcement bodies	Little progress	Strategic coordination group Enforcement bodies
2024 to 2025	11	Social care – assessment of joint approach	Good Progress	ODLME Enforcement bodies

5. Engagement and support

5.1 Introduction

Most businesses want to be good employers and also want to operate on a level playing field. Improving engagement with employers and better support for workers will help improve compliance. The recommendations in this theme look at building on initiatives that promote best practice. It also asks what must be done to ensure that workers have access to better information and support to enforce their rights.

Recommendations I have made in this space since 2023 have focused on:

- supporting good employers: Recommendation 10 2023 to 2024; Recommendation 6 2024 to 2025
- supporting (vulnerable) workers: Recommendation 11 and 12 2023 to 2024; Recommendations 7, 8 and 9 2024 to 2025
- Enforcement bodies' strategic communications: Recommendation 9 2023 to 2024

5.2 Supporting employers

Recommendation 10 2023 to 2024 was for ODLME to assess formally business initiatives designed to promote compliance to help complement state efforts to improve compliance among employers. In addition to explore the role of Environment, Social and Governance (ESG) factors in creating non-statutory incentives for businesses to raise compliance.

Recommendation 6 2024 to 2025 focused on encouraging the EBs to reach small businesses through the growth hubs to encourage compliance.

5.2.1 Business initiatives

Government is not the only party with an interest in improving compliance. Industry-led initiatives and activity undertaken by NGOs can play an important role, often reaching businesses or workers that are less accessible to government.

In my 2023 to 2024 strategy, I was keen for my office to explore how to work more effectively with industry. In the past GLAA promoted industry focused protocols (e.g. in food, retail and construction) convened meetings of interested parties to support compliance initiatives. GLAA passed the lead to businesses but the momentum was not maintained.

GLAA has developed an external communication plan and continue to share information and awareness on the social media website and through joint webinars. They have also engaged in joint webinars with other bodies, utilising social media to reach stakeholders. They also attend round table events and present at conferences such as the Association of Labour Providers (ALP) roadshows.

HMRC NMW target specific industries with awareness campaigns. In 2023 to 2024 HMRC NMW focused on the retail, motoring and care sectors, with activity in the childcare sector planned. Publicising these campaigns through trade bodies has proved effective for raising awareness in sectors like retail and childcare.

EAS has been actively working with trade bodies. Their efforts include webinars and outreach to organisations like Acas to educate and train their staff on EAS's role and when to refer cases to them. This has led to spikes in calls and inquiries received from Acas after the training sessions.

More broadly, leverage can be applied to larger private sector organisations globally to help incentivise improved performance around environmental, social and governance factors (ESG). Several ESG rating agencies exist to guide investors towards those businesses exhibiting more sustainable and socially conscious operations. The government's announcement towards the end of 2024 to strengthen the regulatory regime here was welcome (HM Treasury 2024).

In recent months there have been signs that political and business appetite for both ESG and initiatives around diversity, equality and inclusion (DEI) have waned. Progress on important legislation has stalled, most notably with the European Commission's draft Corporate Sustainability Due Diligence Directive (European Commission, 2025). UK companies generating turnover of more than 450 million Euros in the EU will still be in scope, despite the UK's departure from the EU.

In addition, some doubt has been cast about the impact of ESG policies generally (Lerner et al., 2025). Evidence suggests a much greater focus by business on the 'E' (environmental sustainability) over the 'S' (social) element (Barrientos, 2025).

I am however pleased to that the UK's Trade Strategy, launched in June this year, recognises the risks to environmental and labour standards that unfettered competition can have. In response, the UK government has committed to launching a review of the UK's approach to Responsible Business Conduct – already codified at international level through OECD guidelines – focusing on the global supply chains of businesses operating in the UK (DBT, 2025c).

Good work continues to be done to raise the profile, and measure progress of adoption, of ESG. An annual assessment of FTSE 100 companies carried out by CCLA Investment Management Ltd. (CCLA, 2025) provides a useful and transparent mechanism to gauge activity including compliance with the 2015 Modern Slavery Act (including ensuring company modern slavery statements are uploaded to the government registry), conformity with Home Office guidance on modern slavery as well as businesses own efforts to find, fix and prevent modern slavery risks. Overall, such assessments suggest progress continues to be made (up to 2024 at least), though it does also highlight the need for businesses to be doing more to provide remedies to victims of modern slavery including within their supply chains. One encouraging example of this is the work of Design for Freedom brings industry leaders together to eliminate forced labour in the building materials supply chain.⁴

Despite the recent pushback on ESG, the fact that environmental factors will remain so important should mean ESG continues to play a central role in business sector priorities, and, in doing so, I hope sufficient weight is also given to the social elements.

4 [Design For Freedom by Grace Farms](#)

5.2.2 Small business and growth hubs

For the Geographic Compliance Approach (GCA), HMRC NMW has collaborated with some growth hubs to publicise their activities and distribute leaflets to employers in the area. The level of engagement from growth hubs can vary depending on their resources and proactivity. HMRC NMW would like growth hubs to give visibility to employers about compliance activities happening in their area. More generally HMRC NMW have been providing content and trying to engage growth hubs across different regions to help publicise minimum wage requirements to employers. HMRC NMW have contacted many of the 47 growth hubs, but the contact information may be incorrect, unmanned or have closed down.

The HMRC NMW promote team links into the growth hubs every quarter and every 6 months a newsletter goes out to their list of stakeholders. Most of the employment agencies and businesses they regulate are SMEs, so their regular engagement covers that sector.

HMRC NMW reported a positive response from five growth hubs:

- Derby and Nottingham publish information about internships, local HMRC NMW activities in the area as part of GCA and awareness sessions
- Enfield promoted awareness sessions
- Leeds City promoted awareness sessions, GCA and newsletter
- York published information about internships and newsletters
- North Yorkshire has published information about internships and newsletters.

EAS have had conversations and provided input to trade bodies representing SME employment agencies on topics like tax changes, ending zero-hour contracts, and regulating umbrella companies. EAS does not rule out working with growth hubs in the future if it could help disseminate their guidance to SMEs more effectively.

GLAA has not worked with growth hubs but will link in with them operationally as needed.

5.3 Supporting workers

Recommendation 11 2023 to 2024 and Recommendation 9a 2024 to 2025 focused on enhanced knowledge of worker rights.

Recommendation 12 2023 to 2024 and Recommendation 9b 2024 to 2025 looked at community support for workers.

Recommendation 8 2024 to 2025 concerned access to payslips and Key Information Documents (KIDs).

Recommendation 7 2024 to 2025 was aimed at tracking worker complaints to ensure worker complaints are handled properly and efficiently especially if they need to be handed off to other enforcement agencies.

5.3.1 Enhance knowledge of workers employment rights

Recommendation 11 2023 to 2024 asked what more can be done to support vulnerable workers generally in raising awareness of their employment rights and Recommendation 9a 2024 to 2025 concerned how the enforcement bodies can work with community organisations to enhance communications to workers at risk of exploitation.

HMRC NMW produces worker leaflets and co-produces joint leaflets, providing minimum wage compliance information in multiple languages. They have phone lines with translators for most languages and many staff who speak multiple languages, although Welsh is more challenging. The online complaint form is available in English.

HMRC NMW's attempts to engage educational institutions, career advisors, and other groups to raise awareness about the National Minimum Wage have been labour-intensive and have had varying degrees of success. Strategies to reach 'hard to reach' groups of workers have been challenging, and a broad, scattergun approach has not been effective. HMRC NMW told us they have tried to engage groups like Tax Facts and the Prince's Trust, but with limited success so far. Focusing efforts in a more targeted way on specific demographics may be something to explore going forward.

Beyond this, HMRC NMW continues its long-established bilateral engagement with the TUC.

EAS reports working with unions, NGOs, and other organisations to disseminate information and share materials and guidance. They have collaborated closely with groups like the TUC, NASUWT, transport unions, GMB, Flex, the Modern Work Foundation and Unseen.

GLAA's work is the Victim Navigator Programme helps support engagement with the investigative process and aim to increase convictions. On average 98% of victims assigned to the Victim Navigator remained engaged with the investigative process in 2024 to 2025, surpassing GLAA target of 95%. Without this dedicated support, victims may be overlooked due to the high caseloads of investigating officers or may feel unsupported, increasing the risk of disengagement.

Recommendation 9a in 2024 to 2025 encouraged the EBs to look at alternative formats and vehicles for communication. Although GLAA and HMRC NMW produce advice translated into different languages, there is a concern that the text may not be written in ways that are clear enough and whether, for example, leaflets reach workers or indeed whether leaflets are the best vehicle for getting messages across.

5.3.2 Community support for workers

Recommendation 12 2023 to 2024 was for ODLME to evidence the role of community organisations to provide support for vulnerable hard-to-reach workers. A report was presented to the LME Board in autumn 2023. Recommendation 9b 2024 to 2025 built on this by considering two specific regional cases (Scotland and Manchester) to understand how their community initiatives were helping to achieve business compliance and prevent worker exploitation.

HMRC NMW engages with organisations like Unseen, Flex and with the devolved administrations to share information and support. The GLAA told us they have engaged with migrant community groups, via WhatsApp to share information on workers' rights in the care sector.

Recommendation 9b, was for ODLME to lead. ODLME delayed commencing work on this recommendation until the spring of 2025, in part due to limited team resources. Since then, good progress has been made in establishing engagement with both the Greater Manchester Combined Authority, Good Business Charter, as well as with the Scottish Government and other stakeholders such as the Fair Work Convention in Scotland, the Worker Support Centre Scotland, Workers Educational Association (WEA), and Citizens Advice. These organisations have provided valuable insights and ODLME appreciates the time and assistance they have provided.

This work builds on work done by ODLME in late 2023. It focused on understanding the mechanisms that the government may leverage to reach more workers and help them understand their rights. The goal is to understand how community organisations can increase their prominence and support workers in understanding their employment rights, as well as helping businesses remain compliant. Findings in relation to recommendation 9b were presented to the LME Board in the autumn of 2025.

5.3.3 Access to payslips and Key Information Documents

Recommendation 8 2024 to 2025 looks at how can we strengthen the evidence base around on the provision of basics such as clear and accessible payslips.

Payslips are vital for workers for recording hours worked, deductions that are made and net pay received. They provide important documentary evidence to help understand whether they are being paid correctly.

Employees and workers have the right to a payslip and the law states that this should include earnings before and after any deductions. The amount of any deductions that may change each pay period, for example tax and National Insurance. The number of hours worked, if pay varies depending on time worked must be recorded. Employers must also explain any deductions fixed in amount, for example repayment of a season ticket loan. They can choose to do this either on a payslip, or in a separate written statement. This separate statement must be sent out before the first payslip. Employers must update this every year (Gov.UK, 2025). However, evidence I received from stakeholders suggests some people are either not getting payslips, or – more often – receive payslips that are unclear and confusing.

With larger employers, payslip issues can relate to inaccurate or unclear descriptions and coding. For smaller businesses the issue is more often whether a payslip is provided at all. Issues also include payslips showing workers paid by piece rate (e.g. kilos) rather than on the basis of recorded hours worked.

Around 30% of HMRC NMW cases require employers to keep new records and existing documentation is insufficient to demonstrate National Minimum Wage compliance. Micro-businesses frequently rely on informal or handwritten records, and legislation allows flexibility in payslip content as long as NMW payment can be determined.

EAS frequently receives complaints about holiday pay not being shown correctly on payslips. Ensuring proper payslip information is a key focus area for EAS, especially for umbrella companies.

The findings from the ODLME-led research into the scale and nature of labour market non-compliance available later this year will provide much-needed additional evidence of the extent of the problem. My strategy for 2025 to 2026 recommends further work to improve the evidence base here to then strengthen compliance.

EAS considers the Key Information Document (KID) requirement as the most frequently breached regulation by employment businesses, with many supply teachers not receiving a KID. EAS is reviewing the KID legislation.

5.3.4 Tracking worker complaints

Recommendation 7 2024 to 2025 proposed mapping processes to assess how worker complaints are handled between the EBs.

When workers make a complaint, they need to feel safe in raising issues and confident that their issues will be resolved quickly and correctly. Employment rights and legal language can be difficult to navigate, and it is unreasonable always to expect workers to know to whom their complaint should be directed. When complaints are raised it can be for several reasons and there could be more than one of the 3 EBs or wider enforcement that has an interest. Wherever the entry point is for the complaint, it should be triaged and shared with enforcement appropriately.

There is concern that issues raised may fall through the gaps between EBs. This may be due to the EBs not understanding each other's remits. One answer is for the EBs to share more and for each organisation to decide for themselves if it applies to them. As noted in section 5.2, EAS in particular have been providing education and training to GLAA and Acas, to help ensure worker complaints reach the right agency.

Some complaints may never reach the EBs, with workers going elsewhere to raise concerns, which for various reasons may not get escalated further.

EAS, HMRC, and GLAA report that they all have similar entry points for receiving complaints and queries, including helplines, email inboxes, and web contact forms. They do not believe there is an issue as regards complainants finding it difficult to navigate the existing system.

Mapping these entry points has been done for the upcoming FWA to establish a streamlined process. The EBs acknowledge that there are some inefficiencies where agencies may forward irrelevant cases due to a lack of understanding of their respective roles. However, they believe interconnectivity between them is generally working well, with cases rarely going to the wrong place.

The EBs are aware of each other's entry points for complaints and queries and try to avoid duplication by redirecting queries to the right body. Complaints come through the GLAA Contact Centre, and GLAA is confident in its relationship with other bodies who take appropriate action post hand-off, with no need for further follow-up.

5.4 Strategic communications

This recommendation focused on reviewing existing communications approaches by the 3 EBs and exploring opportunities for enhanced reporting on operational work to external stakeholders. (Recommendation 9 2023 to 2024).

I reported in my 2023 to 2024 strategy that the EBs had agreed to create a joint Strategic Communication Plan (SCP). This would review the various communications approaches used across the 3 EBs and identify where increased co-ordination could enhance the impact of their communications.

Through the SCP the EBs agreed a common purpose, namely:

- cultivating a compliant environment helping to create a level playing field for business
- ensuring business has the knowledge and tools to meet compliance requirements and are incentivised to comply with them
- ensuring business knows and trusts the enforcement bodies, providing honest advice and intervening proportionately
- ensuring workers and stakeholders are better empowered to understand their rights and protections
- ensuring workers have the confidence to report bad and exploitative businesses

The EBs made a good start, presenting their SCP to the LME Board in 2023. My recommendation 9 from the 2023 to 2024 LME strategy gave encouragement for them to go further, including opportunities to showcase the results of their operational work. This was reinforced through recommendation 3 in 2024 to 2025, discussed in section 3.4.

As with the Strategic Collaboration Plan discussed in section 3.3, occasional reporting and updates on this from the enforcement bodies to the LME Board mean that it is difficult to fully assess how this work has evolved and the impact it has had. External stakeholders continue to ask for greater feedback on operational activity notably where they have provided information about non-compliance.

5.5 Summary of progress against recommendations

Table 5.1: Overview of progress against recommendations under the engage and support theme

Year	Rec	Short Title	Rating	Lead
2023 to 2024	9	Enforcement bodies Strategic Communication Plan	Some progress	Enforcement bodies
2023 to 2024	10	Business initiatives to promote compliance and Environment, Social and Governance factors	Some progress	ODLME Enforcement bodies
2023 to 2024	11	Enhance knowledge of workers' employment rights	Some progress	ODLME
2023 to 2024	12	Local organisations support for vulnerable workers	Implemented	ODLME
2024 to 2025	6	SMEs and growth hubs	Some progress	Enforcement bodies
2024 to 2025	7	Tracking and streamlining complaints across the enforcement bodies	Little progress	Enforcement bodies
2024 to 2025	8	Stronger evidence base KIDs and payslips	Some progress	Enforcement bodies
2024 to 2025	9a	Enhanced knowledge of workers rights	Some progress	Enforcement bodies
2024 to 2025	9b	Community organisations promoting workers' rights	Good progress	ODLME

6. Moving towards the Fair Work Agency

6.1 Introduction

This section covers two recommendations I made in my 2023 to 2024 and 2024 to 2025 strategies that did not fall neatly into the four-theme structure.

These relate to:

- conducting a gap analysis: Recommendation 1 2023 to 2024
- understanding what works: Recommendation 12 2024 to 2025

6.2 Conducting a gap analysis

In December 2018 the previous government announced its intention to create a single enforcement body (SEB) for worker rights. A consultation was carried out in 2021, but the SEB was ultimately not taken forward despite a manifesto commitment to do so and clear support from a range of stakeholders.

Recognising the lack of progress in early 2023 on the creation of a SEB for labour rights, Recommendation 1 2023 to 2024 was designed to identify and realise some of the benefits that could be delivered under existing structures and legislative powers. As a first step this involved my office undertaking a gap analysis of non-legislative aspects of the SEB for initial consideration at the LME Board. The following areas for potential action were presented to the LME Board in October 2023:

- ODLME and the EBs strengthening the common view of risk and agreeing firmer actions to respond to these
- ODLME having more of a convening role to bring together partners inside and outside of government to strengthen joint action in high-risk sectors
- more scope to improve use of data – and possibly data and intel sharing – to establish a better picture of risks
- better independent evaluation of what delivers the best outcomes and sharing of good practice
- doing more to make it easier for workers and employers to know where to go for help. The landscape here remains severely fragmented despite good work by the EBs to raise profiles

- how to improve our understanding of the serious labour exploitation risk and resourcing the enforcement response

Next steps involved further bilateral consultation with the enforcement bodies with the aim of holding a joint workshop to implement an agreed plan in the first half of 2024. This was put on pause with the announcement of a general election in May 2024 and the possibility of creating the FWA.

6.3 Understanding what works

Recommendation 12 2024 to 2025 was to undertake a collective assessment of the different approaches to achieving compliance. It was aimed at understanding better the relative impact of the various tools and interventions used by the EBs and to assess which might be most effective in the FWA.

I re-submitted my 2024 to 2025 strategy in summer 2024 to the then incoming new government. I wanted to ensure the strategy would remain relevant in light of the government’s Plan to Make Work Pay – especially with the creation of the Fair Work Agency – and later introduction of the ERB.

Creation of the FWA is a significant undertaking. In preparation for this my strategy for 2024 to 2025 recommended (recommendation 12) that the enforcement bodies and sponsor departments evaluate the compliance and enforcement interventions used across the 3 EBs, and, as such, should be carried forward to the FWA.

To date there has been limited progress on this. As noted in section 3 much work remains to be done by the individual bodies themselves to understand properly the impact of their work. HMRC NMW’s evaluation of the GCA is the standout exception to this. I strongly encourage similar work going forward and for the learning to be shared and absorbed by what will be the other constituent parts of the FWA.

6.4 Summary of progress against recommendations

Table 6.1: Moving towards the Fair Work Agency

Year	Rec	Short Title	Rating	Lead
2023 to 2024	1	Gap analysis and implementation plan	Some progress	ODLME
2024 to 2025	12	Respective impact of approaches to compliance	Little progress	Enforcement bodies and sponsor departments

7. Activities of the ODLME Information Hub, 2023-25

7.1 Introduction

The ODLME Information Hub has undertaken several activities between 2023 and 2025 with the express aim to fill data gaps in the director's assessment of the scale and nature of labour market non-compliance and the risk to workers.

7.2 Strategic Co-ordination Group (SCG)

ODLME chairs a cross-government group which meets monthly and looks at issues of labour non-compliance and exploitation and the response to existing and emerging threats. Membership of the group includes the enforcement bodies, law enforcement agencies and other government agencies.

The SCG serves as a vehicle to share information, liaise and co-ordinate and discuss joint activity. The perspectives and remits of members are different so not every issue raised at the SCG impacts uniformly across the membership. Joint activity can vary from sharing contacts and intelligence, up to and including joint visits, where multiple agencies attend the same intervention opportunities.

It is expected that SCG meetings will continue forward under the Fair Work Agency. The enforcement bodies currently under my remit already engage and work collaboratively but being under the FWA's umbrella brings further opportunities.

7.3 Analysis and Research Group (ARG)

The analysis and research group (ARG) was set up by ODLME to help capture the view across other government departments on sectoral assessments and the evidence of labour exploitation. So far, the ARG has convened 2 task and finish working groups and produced 2 collective assessments. One is on adult social care (ASC) and the other on agriculture, as well as mini assessments on some medium priority sectors.

7.3.1 Adult social care working group

This group was assembled in autumn 2024 and led by ODLME to share views and knowledge of the ASC sector and agree a shared assessment of exploitation in the care sector.

The group comprised several government departments: Department for Health and Social Care, Home Office and UK Immigration and Visas, Ministry for Housing, Communities and Local Government, Care Quality Commission, Welsh Government, Scottish Government, HMRC NMW, EAS, GLAA, Department for Business and Trade.

The aims were achieved and the assessment included in the 2025 to 2026 LME strategy, used by UKVI for their own memoranda of understanding (MoUs) between partners and referenced in a National Audit Office (NAO) and Independent Chief Inspector of Borders and Immigration report about joint working in the ASC sector.

7.3.2 Agriculture working group

A similar, but smaller working group was established to focus on the agriculture sector. The group consisted of Defra, Home Office and the enforcement bodies, led by ODLME.

The aim was to meet regularly to discuss SWV, the data used and what improvements were needed. These include changes to DLME assessments, the Seasonal Worker Visa Survey and assessments by Defra on the SWV scheme, as well as emerging issues such as accommodation and fraud.

These aims were achieved by the group by the 1st of March 2025 with sign off from all departments. The document was included in the 2025 to 2026 strategy. There was also a commitment from Defra to work with ODLME or the FWA to include more questions in the SWV survey around worker exploitation.

7.4 Research undertaken

The ODLME Information Hub has also been part of a research programme to contract externally further research to academia, including:

(i) The scale and nature of labour market non-compliance in precarious working

The first project report was published in November 2024 (DLME, 2024b). The research identified 5 distinct groups of workers and showed that some groups tend to age into more secure employment, others become increasingly precarious over time, and others dip into and out of precarious work. The main findings are that around 10% of the workforce could be classified as precarious, and this is a remarkably stable figure. The main data collection for the project was conducted in spring 2025 with further quantitative and qualitative work in summer 2025. The project will complete in late 2025 with a final report published soon afterwards.

(ii) Modern Slavery in the construction industry, with the Modern Slavery Policy and Evidence Centre (MSPEC)

This report was published in Autumn 2025 (Gutierrez Huerter O, 2025). The project's focus is primarily on the housebuilding sector and has three specific aims:

- to systematically analyse and examine the quality and breadth of the existing evidence base on modern slavery in UK construction
- to consolidate the key findings from the existing evidence base on modern slavery in the UK construction sector
- to make recommendations to policymakers and researchers

8. Enforcement body performance 2023 to 2025

8.1 Introduction

This section provides a high-level overview of performance of each of the EBs over the period 2023 to 2025. Further detail on HMRC NMW performance is covered in the document published alongside this annual report (DBT, 2025c).

It should be noted that all 3 EBs have undergone changes to their strategic approach in the period which have impacted the data they collect and on which they report. This is discussed in the individual enforcement body sections.

8.2 Resources

In 2024 to 2025 government funding for the 3 EBs plus my office was around £40 million a year, just over £1million less in nominal terms from 2023 to 2024 but still almost £3.4 million higher than in 2022 to 2023. Three factors explain these changes:

- the 13% increase in funding HMRC NMW received between 2022 to 2023 and 2023 to 2024⁵
- the additional one-off boost of £1.1 million received by GLAA in 2023 to 2024 to cover the cost of a organisational transformation
- the reduction of £0.36 million in GLAA's ongoing operational funding from the Home Office between 2022 to 2023 and 2024 to 2025

For both EAS and ODLME funding has remained static in nominal terms (hence a decrease in real terms) since 2020 to 2021.

At this stage equivalent funding for the Fair Work Agency – which will comprise the bodies listed in table 8.1 – remains unknown.

Staffing – expressed in full-time equivalent terms (FTE) – totalled 560 across the four organisations in 2024 to 2025. This is 30 FTE fewer than two years ago.

⁵ This reflected the increased costs for HMRC arising from the 3-year pay deal agreed in 2021

Table 8.1: Funding of the enforcement bodies and ODLME (£ million)

	2020 to 2021	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025
HMRC NMW	£26.4	£26.4	£27.8	£31.20	£31.50
GLAA ¹¹	£6.75	£7.12	£6.62	£7.77 ¹²	£6.26
EAS	£1.53	£1.53	£1.53	£1.52	£1.53
ODLME	£0.65	£0.65	£0.65	£0.65	£0.65
Total	£35.33	£35.7	£36.6	£41.14	£39.94

Table 8.2: Number of full time equivalent (FTE) staff averaged over the financial year

Number FTE staff	2020 to 2021	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025
HMRC NMW	420	390	447	436	427
GLAA	111.3	117.6	113.3	112.5	105.4
EAS	17.5	22.3	24.4	17	22
ODLME	7.6	7	6.5	6	6
Total	556.4	536.9	591.2	571.5	560.4

8.3 HMRC NMW

Minimum wage enforcement is carried out by HMRC NMW by means of a Service Level Agreement with the Department for Business and Trade. In 2023 to 2024 the Government asked HMRC NMW:

“...to focus on broadening the reach of its activities, to focus more on helping businesses to comply with the law, and to spend less time on very large employers and more on smaller employers who have less access to specialist services to help them comply” (DBT, 2025b).

HMRC NMW has accordingly changed its compliance and enforcement approach. One consequence of this is that the traditional reporting on outcomes (for instance the total value of arrears identified, or the volume of workers affected) no longer fully captures the totality or impact of HMRC’s activity. The historical data reported in table 8.3 should therefore be interpreted with caution.

One criticism of the traditional reporting approach had been that, for instance, measuring the number of workers for whom minimum wage arrears have been identified, tells us little as to whether compliance is improving over time. To help overcome this, HMRC NMW now includes a new metric around the number of workers assured – that is, the number of workers who HMRC has investigated and found to be paid correctly. As such, just over one million workers are now assured each year by HMRC NMW.

An important innovation introduced by HMRC NMW in recent years has been the Geographic Compliance Approach (GCA). GCA aims to provide a more supportive approach for employers, thus aiding compliance, using a series of interventions in a targeted geographical location. GCA has several benefits including creating a ripple effect to induce behavioural change among employers, testing the NMW risk model, enabling better measures to assess the impact of HMRC interventions, and testing the effectiveness and longevity of these on behaviour (DBT, 2024). As noted in section 3.2 in May 2025 HMRC NMW published an extensive evaluation of GCA (HMRC, 2025).

The introduction of GCA has had a marked impact on HMRC NMW performance. HMRC is now closing well over 4,500 cases each year (almost twice as many as in 2017 to 2018). Half of these are traditional complaint-led and targeted enforcement cases (where strike rates – cases where arrears are identified – have held steady over time). Now, in addition there have been around 700 cases on average closed via targeted enforcement under the GCA over the period 2023 to 2025, plus an average of 1,700 compliance closures. The latter are essentially Employer Support Calls, mostly in relation to GCA. Employers can self-review for possible non-compliance and make voluntary declarations to repay wages owed without the usual NMW enforcement sanctions. In 2024 to 2025 there were 214 voluntary declarations resulting in over £1.5 million being repaid. GCA has been a considerable success, proving to be both an effective and efficient part of the HMRC NMW toolkit.

There has also been a marked increase in recent years around NMW prosecutions. There have now been 35 prosecutions since 2007, but almost half of these only in the past 3 years reflecting a different approach. Again, this is an area DLME long pushed for, though it remains unknown the extent of the deterrence effect associated with prosecutions.

Finally, since 2009 the government has used reputational penalties ('Naming') as a deterrent against employer non-compliance with the minimum wage. Over this period some 22 'Naming Rounds' have taken place, whereby employers found to be non-compliant with the minimum wage have been publicly named via a press release from the Department for Business and Trade.^{6,7} This is accompanied by an educational bulletin to raise awareness among employers generally about areas of risk for minimum wage underpayment. Naming rounds generally attract media attention and the attention of those who use the services of the named companies, further helping to publicise the obligation of employers to pay the minimum wage.

My office has been very supportive of the use of Naming because of the strength of the deterrence effect. However, since 2023 to 2024 there have only been 4 naming rounds. There had been an ambition under the previous government to undertake these quarterly (DLME, 2023). The decline in frequency of Naming Rounds has led to a backlog in reporting such that employers are often named years after they were found to be non-compliant. To try to address this backlog the Department has held 2 Naming Rounds in 2025 – May and October – in both cases naming around 500 employers, up from about 200 in previous rounds. I hope that Naming will continue under the FWA and that it is done in a timelier fashion.

6 Since 2009 DBT has carried out 22 Naming Rounds, the most recent of which was on 17 October 2025.

7 [£6 million repaid to workers as Government cracks down on employers underpaying their staff – GOV.UK](#)

Table 8.3: HMRC NMW Performance Metrics, 2021/22 to 2024/25

Enforcement Activities	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025
Closed cases	2,835	3,192	4,642	4,764
Complaint-led	326	449	855	919
Targeted	2,509	2,743	1,136	1,409
GCA Targeted Enforcement	na	na	885	497
Assurance/repeat visits	na	na	110	133
Compliance closures	na	na	1,656	1,806
Closed cases with arrears	898	924	937	1,161
Complaint-led	14	10	368	408
Targeted	884	914	363	493
GCA Targeted Enforcement	na	na	143	154
Assurance/repeat visits	na	na	13	13
Compliance closures	na	na	50	93
Strike rate – all (Percentage)	32%	29%	20%	24%
Strike rate – complaints (Percentage)	4%	2%	43%	44%
Strike rate – targeted (Percentage)	35%	33%	32%	35%
Strike rate – GCA TE (Percentage)	na	na	16%	31%
Strike rate – assurance/repeat visits (Percentage)	na	na	12%	10%
Strike rate – compliance closures (Percentage)	na	na	3%	5%
Enforcement Outcomes	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025
Arrears identified (£m)	£16.32	£13.66	£7.64	£5.78
All workers assured	1,141,000	1,169,000	1,173,000	1,001,531
Workers owed arrears	120,295	108,561	52,155	25,230
Arrears per worker	£136	£126	£146	£229
Penalties issued	696	750	723	750
Total value of penalties	£13.17	£13.72	£5.25	£4.16
Prosecutions	3	3	10	4
Total Prosecutions since 2007	19	22	32	36
Naming Rounds	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025
Number done in FY	2	0	2	0
Total firms named	399	0	726	0
Total amount of arrears (£m)	£3.35	0	£20.79	0
Total workers owed arrears	45,994	–	235,752	–
Average arrears per worker (£)	£72.73	0	£88.19	0

8.4 GLAA

GLAA has undergone significant change since 2023, both in terms of structure and its strategic approach to enforcement. The GLAA strategy for 2023 to 2026 was centred around three strategic goals: to be a robust and effective regulator; to be known as experts in addressing worker abuse and exploitation; and to be an essential business partner (GLAA, 2023). The first year of the strategy (2023 to 2024) included development and implementation of a new operating

model and strengthening intelligence and regulatory functions. Year 2 (2024 to 2025) involved embedding the changes made in Year 1 to achieve better prioritisation of work. Year 3 (2025 to 2026) would see the fruits of this work to demonstrate the impact of changes introduced.

Table 8.4 summarises the most recent performance results for GLAA. Key points to bring out are as follows:

- for the regulated sectors (agriculture, horticulture and shellfish gathering) there has been an increase in total licenses for gangmasters since 2022 to 2023, in part reflecting a significant reduction in time taken to process licence applications (from 225 working days on average in 2022 to 2023, to 42 days in 2024 to 2025)
- there has been a strategic shift away from conducting application inspections⁸ to carrying out more compliance inspections⁹, reflecting a refocusing towards higher risk gangmasters
- the number of GLAA referrals of potential victims of modern slavery into the National Referral Mechanism – either with consent or without (Duty to Notify) – remains low in the context of scale and growth of all NRM referrals associated with labour exploitation.¹⁰ GLAA does support other first responders but does not routinely record this activity

GLAA is the only one of the 3 EBs to receive regular, independent scrutiny from those it regulates. The latest annual survey conducted by the Association of Labour Providers (ALP) in 2025, the trade association of which gangmasters licensed by GLAA are members, highlights the continuing support for gangmaster licensing but expresses concern about the effectiveness, visibility and resourcing of the GLAA (particularly in the run-up to the Fair Work Agency) (ALP, 2025). Concerns were raised too around value for money of the licensing fees, which increased by over half in April 2025. However, it should be noted that licence fees had not increased since 2009 with the GLAA operating well below cost-recovery for provision of this service (GLAA, 2025b).

8 As part of the GLAA application process, Licensing Officers review applications and related documentation to check compliance with the Authority's Licensing Standards. These checks are to ensure that the applicant is both 'fit and proper' and 'competent' to hold a GLAA licence. [Virtual application inspection explained – GLAA](#)

9 The Gangmasters and Labour Abuse Authority (GLAA) inspections check compliance with the Authority's Licensing Standards. Inspections may be conducted with applicants or existing licence holders to test whether a person is fit to hold a licence. [Inspections explained – GLAA](#)

10 There were almost 2,000 referrals for labour exploitation alone in the quarter April to June 2025, the highest level on record.

Table 8.4: GLAA compliance and enforcement activity, 2021 to 2025

	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025
Licensing Activities				
Total licences	1,049	1,016	1,060	1,136
Application inspections*	166	134	114	42
Average working days to complete	94	225	138	42
ALCs issued	19	24	37	13
Licences revoked	2	4	7	19
Enforcement Activities				
Compliance inspections**	61	13	74	168
Average working days to complete +	229	na	na	87
Enforcement Investigations	331	316	202	224
Enforcement Outcomes				
Victims identified +	6,024	4478	na	na
Money recovered (£) +	78,922	165,000	na	na
Arrests	16	4	1	2
Enforcement notifications	8	53	14	20
Warnings	21	132	26	17
NRM referrals	7	5	5	14
NRM notifications under duty to notify	25	185	16	8
Safety and Trafficking Risk Orders (STROs)	11	20	1	0
Safety and Trafficking Prevention Orders (STPOs)	0	1	1	0

*The GLAA changed its approach to application inspections – only inspecting those deemed higher risk.

** This is defined as compliance inspections tasked.

+Due to a change of systems, GLAA did not capture this information for 2023/24 to 2024/25.

8.5 EAS

EAS as the government regulator for the private recruitment sector in Great Britain, is by far the smallest of the 3 EBs with around 30 staff, of whom 18 are frontline inspectors. Overall, there are estimated to be more than 30,000 recruitment businesses. A third of these operate as temporary worker employment agencies, but the temporary worker agencies account for 82% (£33.9 billion) of the estimated £41.3 billion contribution the recruitment sector makes to the UK economy.

EAS operates under three pillars:

- advise – providing advice, guidance and support to work-seekers, hirers, and businesses about current legislation to support and protect all parties in the employment relationship
- protect – vulnerable work-seekers where their employment rights may be denied
- enforce – legislation, where serious and or repeated non-compliance is identified

EAS have been undergoing a systematic organisational change over the last four years to become a more efficient and effective regulator. To do this, it has developed a multi-year strategy with four key pillars: Brilliant Basics, Standardisation, Systemisation and Automation, Empowering Performance, and Data Driven. The focus on Brilliant Basics helped establish an inclusive all EAS culture.

Standardisation, Systemisation and Automation (SSA), sought to create the most efficient and effective enforcement operating system, and where possible automate it. This was achieved through EAS' case management system, and refining and defining processes including introducing standard lines for EAS written work to assure consistency and accuracy. This resulted in upwards of 80% processing time improvements and allowed EAS to garner better management information (MI) than ever before.

Most of the focus of this change programme has been on empowering performance. Improved systems and management information led to the introduction of a point-based performance system which allowed targeting of customer focused operational activity and allowed inspectors and managers to better empower performance. This has driven a 70% increase in outward bound operations (targeted inspections) over the last reporting year.

These changes are already starting to bear fruit (table 8.5):

- the volume of infringements found is up by at least 50% on pre-pandemic levels
- EAS has also issued a record number of warning letters (approaching twice the amount achieved 2 years ago)
- over the period 2023 to 2025 EAS has recovered over £300,000 for workers

Table 8.5: Overview of EAS performance 2021 to 2025

Type/year	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025
Complaints received	2,170	2,300	1,931	1, 935
Complaints cleared	2,275	2,033	1,872	1,871
Targeted inspections	118	267	335	570
Infringements found (cleared cases and inspections)	724	1,571	1,388	2,393
Total number of warning letters issued	212	385	617	706

8.6 Case activity by sector

Table 8.6 provides an overview of enforcement activity detailing case load by sector. Case load data are combined for the period 2023 to 2025.

Agriculture, hand car washes, construction and adult social care represent those assessed by the ODLME risk model to be at higher risk of non-compliance. It should be noted that the focus of the risk model is on the more serious end of labour non-compliance.

Key observations:

- generally, the enforcement bodies' highest caseloads have been in the high-risk sectors
- HMRC NMW is the only exception to this, where their focus has been on lower-harm hospitality and wholesale and retail
- both GLAA and EAS saw big increases in cases in the adult social care sector reflecting the surge in allegations and the rollout of Operation Topaz
- enforcement activity in the construction sector has been relatively low across all 3 EBs

Table 8.6: Main sectors of case activity by each enforcement body, 2023 to 2025

HMRC NMW	GLAA	EAS
Accommodation & Food Services – 21%	Food processing – 27%	Industrial – 15%***
Wholesale & Retail – 17%	Social care – 27%	Healthcare – 13% <i>of which: Social care – 7%</i>
Admin & Support Services – 12%	Agriculture – 20%	Entertainment & Modelling – 6%
Manufacturing – 10%**	Hand Car Washes – 10%	Construction – 6%
Human Health & Social Work – 9% – <i>of which: Residential care – 3%</i>	Construction – 2%	Commercial – 6%
Services to Buildings & Landscapes – 7 per cent – <i>of which: Hand car washes – 3%</i>		Drivers – 4%
Other – 24 per cent – <i>of which: Construction – 5%</i>	Other – 14%	Other* – 51%

Notes: * EAS 38% of cases no sector identified; EAS does not use standard SIC definition for sectors

** This is predominantly food manufacturing

*** includes food processing

8.7 Labour Market Undertakings and Orders

Table 8.7 provides a summary of use of Labour Market Enforcement Undertakings (LMEUs) and Labour Market Enforcement Orders (LMEOs) since 2021 to 2022.

Whereas LMEUs were more often used (50 open LMEUs at the end of 2022 to 2023), this has now halved to 25 across all 3 EBs in 2024 to 2025. Over the last two years there have been no LMEOs.

The EBs report that use of this sort of intervention can be very resource intensive. Also, EAS reported that where stronger sanctions were merited, they were more likely to use prosecutions and prohibitions.

Table 8.7: Overview of EAS performance 2021 to 2025

	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025
LMEUs				
HMRC NMW	40	43	24	22
GLAA	4	7	8	3
EAS	0	0	0	0
Total	44	50	32	25
LMEOs				
HMRC NMW	0	0	0	0
GLAA	0	0	0	0
EAS	2	1	0	0
Total	2	1	0	0

9. Concluding comments

The fourth annual report published by the ODLME covers two strategies: the 2023 to 2024 and the 2024 to 2025 strategies submitted to government in March 2023 and March 2024 respectively. These were approved for publication by ministers and published in October 2023 and November 2024. I am grateful to the Labour Market Enforcement Board for authorising some foundational work to progress delivery against recommendations while we awaited publication. Board members have also been instrumental in helping to ensure greater accountability for progress in implementing recommendations.

Across the two strategies I made 25 recommendations: 10 recommendations were directed at the enforcement bodies themselves; a further 7 were to be co-led by the enforcement bodies and my office; my office was also solely responsible for delivery of another 6 recommendations. The remaining 2 recommendations were to be delivered in conjunction with the sponsor departments, Home Office and the Department of Business and Trade.

Publication of this annual report comes around a few months before the Fair Work Agency comes into effect. The themes and many of the recommendations presented in the LME strategies reported on here are highly relevant to how the FWA can function effectively. My strategy for 2025 to 2026 has an even greater focus on preparation for the FWA and, in line with my statutory duty, my intention is to publish an annual report on progress against those recommendations at the end of March 2026.

Considering the period 2023 to 2025 against the four guiding themes I have adopted throughout my strategies, progress has been variable.

In terms of improving the radar picture, some progress has been with the bodies sharing data. I would have liked to have seen deeper inroads made into strengthening our use and understanding of available data and information, including data on possible links between protected characteristics and worker exploitation. Better data and better data sharing – among the enforcement bodies and with third parties – are absolutely fundamental to the successful operation of an enforcement body. This should be a priority area for the FWA.

There has been some progress in relation to improving focus and effectiveness. The EBs have developed their joint external communications via webinars. They also now share their operation plans with each other. While this hasn't translated into an overall strategic plan spanning the work of the 3 individual EBs (who point to the differences in their remits) the fact they have been working together much more closely is to be welcomed. There are clear signs too that the EBs recognise the need to understand better the impact of their interventions. HMRC's work on, and evaluation of, the GCA has been a highlight, which I hope will pave the way for even more high-

quality work in this area and opportunities for shared learning. Government as a whole is on a journey to understand better and to harness the opportunities that artificial intelligence can offer. Again, this should be a priority for the FWA.

The picture on joined-up thinking is somewhat mixed. There has been good progress in a reactive sense to learn the lessons of labour exploitation risks stemming from bespoke worker immigration routes in agriculture and social care. As my 2025 to 2026 strategy highlights, we must all factor in and seek mitigations against risks in other sectors, such as construction. Government initiatives, including the Labour Market Evidence Group, will play an important role in this risk mitigation. Other than the GCA work mentioned, progress has been disappointing as regards having a more strategic approach to joined-up operational working. This could benefit addressing sector-specific risks or for the enforcement bodies to improve knowledge of each other's approaches and ways of working.

Progress as regards support for workers and employers, has also been mixed. There are greater opportunities to promote business compliance and to ensure that workers are sufficiently aware of their rights and their routes for seeking remedy. Both will feature strongly as part of the FWA's work, along with ensuring worker complaints are handled efficiently and effectively in the new body. Getting basic documentation and records in place remains a priority. A review of Key Information Documents for agency workers is pending; I continue to press for better evidence around provision and clarity of payslips. One area where encouraging progress has been made is in relation to the role of community organisations to provide trusted help and support to often vulnerable and hard-to-reach workers. A number of promising initiatives are in place across the UK, and I look forward to learning more about their impact and sharing this with FWA.

In addition to reporting on progress against my recommendations, this annual report also provides a more in-depth look at the overall performance of the 3 EBs over the period 2023 to 2025. This covers the entirety of their work.

What is clear from this is how each of the EBs has not only recognised the need for change and continuous improvement, but has put in place robust programmes, strategies and initiatives to effect this change. What is more, their performance metrics bear out the success they have achieved by doing so. I therefore commend them on the progress they have made here, often in the face of funding and other resource constraints. I would like to pay tribute to the commitment and dedication of all those who work in the 3 EBs HMRC NMW, EAS and GLAA in their mission to protect vulnerable workers and create a level playing field for good businesses. I also recognise the diligence and commitment of the sponsor teams in the Department for Business and Trade and the Home Office.

As we approach the FWA, I believe we have a good sense of the scope for more to be done. Resourcing of FWA will be key to how far these requirements and ambitions can be fulfilled.

Finally, I would like to acknowledge the hard work of all those who have contributed to this Annual Report. Thank you especially, to my colleagues in the ODLME (Doris Allende, Mark Birch, Michael Flynn, Kilian Gaillard, Tim Harrison, Laura Matthews, Alison Smith, and James Wignall).

Annex A: Table of recommendations, 2023 to 2024 and 2024 to 2025

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2023 to 2024	1a	DLME undertakes a gap analysis to identify where ODLME and the enforcement bodies are able to deliver benefits that would have come through the creation of a Single Enforcement Body for presentation to the LME Board in May 2023	Good progress	May 2023	ODLME Sponsor departments Enforcement bodies and LME Board	Moving to FWA
2023 to 2024	1b	In light of the board discussion and in co-operation with the enforcement bodies and wider stakeholders, DLME prepares an implementation plan to present to the LME Board by November 2023 with outputs to feed into DLME Strategy 2024 to 25.	Some progress	November 2023	ODLME Sponsor departments Enforcement bodies LME Board	Moving to FWA
2023 to 2024	2a	Building on the existing joint agreement, the DLME will work with the three enforcement bodies to undertake a mapping of what data is currently held and a review of how data is shared under the existing gateways between HMRC NMW, EAS and GLAA including whether improvements to the present arrangements might benefit any of the three bodies.	Some Progress	LME Board July and November 2023	Enforcement bodies LME Board	Improving the radar picture

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2023 to 2024	2b	The review should also consider the barriers to data sharing between the enforcement bodies and third parties and the extent to which these might be overcome.	Some progress	LME Board updates November 2023	Enforcement bodies LME Board	Improving the radar picture
2023 to 2024	3a	To increase the quantity and improve the quality of third-party information received by the enforcement bodies to supplement strategic planning 1. Continue to focus on educating third parties to provide more useful information and reporting, building on initiatives such as the information sharing webinars;	Some progress	Ongoing	Enforcement bodies LME Board	Improving the radar picture
2023 to 2024	3b	2. evaluate and assess the quality of information received, for instance via the online complaints form.	Some progress	November 2023	Enforcement bodies LME Board	Improving the radar picture
2023 to 2024	4a	Following recommendations from earlier LME Strategies, I recommend that the DLME's Information Hub work with sponsor departments and the enforcement bodies to: Build overall capability and capacity to undertake effective learning from compliance and enforcement interventions.	Some progress	Ongoing but clear progress by the end of FY 2023 to 2024	ODLME Sponsor departments Enforcement bodies	Improving focus and effectiveness
2023 to 2024	4b	Develop a robust and consistent approach to measuring the impact of compliance-based interventions, sharing good practice, recognising the specific methodological challenges of evaluating the impact of compliance-based interventions.	Some progress	Ongoing but clear progress by the end of FY 2023 to 2024	ODLME Sponsor departments Enforcement bodies	Improving focus and effectiveness

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2023 to 2024	5	Recognising the operating mandate of the enforcement bodies, I recommend that the enforcement bodies lead the creation, design and completion of a Strategic Collaboration Plan, mapping areas of responsibility and interest across the labour market. The enforcement bodies will share this with the DLME. The 3 enforcement bodies to present a proposal of the Strategic Collaboration Plan, mapping areas of responsibility and interest across the labour market to the LME Board.	Good progress	LME Board July 2023	Sponsor departments Enforcement bodies	Improving focus and effectiveness
2023 to 2024	6	To ensure the most appropriate joint non-compliance threats are identified and addressed in a timely fashion, I recommend that: 1. The SCG evolves its sectoral approach based on its risk modelling and intelligence sharing to lead a more agile response to emerging joint threats by sector. 2. The EB's provide for the LME Board their strategic plans and operational approach to tackle these threats, along with progress updates at subsequent boards. 3. The SCG/EBs embed a learning approach to joint operational interventions and share the findings with the LME Board. 4. The SCG continues to understand and map the challenges to delivering successfully joined up interventions.	Little progress	1) SCG/EBs (monthly), 2) EBs/ LME Board (quarterly).	SCG Enforcement bodies LME Board	Better joined-up thinking

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2023 to 2024	7	Recognising the lessons learned for the operation of the SWV scheme during 2023, with its stronger focus on compliance and worker welfare, while these changes take effect and improvements delivered, I recommend ODLME works closely with government and wider stakeholders to: 1. Facilitate a more joined-up approach to monitor SWV impacts on worker welfare. 2. Raise awareness of worker rights via improved communications for workers and business 3. Strengthen intelligence in this sector to respond to emerging labour non-compliance threats.	Good progress	Quarterly stakeholder meetings beginning May 2023	ODLME Defra UKVI Enforcement bodies stakeholders	Better joined up thinking
2023 to 2024	8	To help minimise the unintended consequences of risks to workers from new labour market -related policy, development: 1. ODLME undertakes an initial mapping of exercise of government departments and agencies with labour market -related policy powers; and 2. Pilots an approach with its sponsor departments (DBT and Home Office) to identify at an early stage in their labour market policy development processes where non-compliance risks may occur. This should be reviewed in 12 months.	Some progress	1. by summer 2023 2. from autumn 2023 3. autumn 2024	ODLME Sponsor departments	Better joined up thinking

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2023 to 2024	9	DLME welcomes and endorses the proposal by the enforcement bodies to create a Strategic Communications Plan and recommends that it includes DLME engagement as well as that of the enforcement bodies and that it is presented to the LME Board. Furthermore, within the strategic communications plan the enforcement bodies should consider what opportunities there might be to report on their operational work that might better meet the needs of external stakeholders.	Some progress	Deliver to the LME Board – November 2023	Enforcement bodies ODLME	Engagement and support
2023 to 2024	10	I recommend ODLME: - work with the enforcement bodies to formally assess business initiatives designed to promote compliance in their areas and think creatively about additional means of engaging with businesses to promote compliance. - Explore the role that ESG (Environmental, Social and Governance) factors might play in creating non-statutory workers' rights throughout the supply chains.	Little progress	Reporting on both issues to the LME Board in November	ODLME Enforcement bodies	Engagement and support
2023 to 2024	11	ODLME working with government, the enforcement bodies, trade union representatives, other worker representation groups and NGOs to continue to explore and promote means to enhance knowledge of workers employment rights including through formal educational channels.	Some progress	Report to the LME Board – February 2024	ODLME Enforcement bodies stakeholders	Engagement and support

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2023 to 2024	12	ODLME to engage with local organisations in a small number of Local Authorities across the UK to evidence better their role in engaging with and providing support to vulnerable, hard-to-reach workers. Results to be delivered to the LME Board by November 2023 and will provide case studies to better inform further interventions within this space.	Implemented	Deliver to the LME Board – November 2023	ODLME	Engagement and support
2024 to 2025	1	I recommend that all three enforcement bodies within my remit seek to collect more and better information on those with protected characteristics to enable analysis of whether those with protected characteristics have increased vulnerability to exploitation. In doing so, this would help demonstrate they are fulfilling their requirement in respect of the public sector equality duty.	Little progress	Reporting to the LME board by the end of the financial year 2024 to 25 and implementing the following year.	Enforcement bodies – HMRC NMW, EAS and GLAA	Improving the radar picture

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2024 to 2025	2	I recommend that ODLME and the three enforcement bodies, working with external stakeholders for example from businesses, trade associations or NGO's develop a shared understanding of terminology and clarify mutual understanding of 'data' 'information', and 'intelligence'. This might usefully include an in-person workshop providing an open forum for discussion to: • give stakeholders better understanding about what data can be shared • understand what data stakeholders feel is missing and to what purpose it might be put. The aim of the workshop is to promote confidence that processes are in place to ensure that complaints are properly investigated and that the activities of the three enforcement bodies are well targeted.	Some progress	Before the end of the financial year 2024 to 2025	ODLME and enforcement bodies: HMRC NMW, EAS and GLAA	Improving the radar picture
2024 to 2025	3	I recommend the three enforcement bodies redouble their efforts to seek out new and potentially shared communication vehicles and maximise opportunities for public messaging, showcasing the results of their work.	Good progress	Progress report to LME Board October 2024	Enforcement bodies: HMRC NMW, EAS and GLAA	Improving focus and effectiveness

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2024 to 2025	4	I recommend the three enforcement bodies place a greater focus on metrics that assess impact and for work to commence that will provide the information, reporting quarterly to the LME Board. Such work might draw on expertise within the sponsor departments or where this is not available, the expert guidance the National Audit Office (NAO) may provide.	Some progress	Reporting quarterly to the LME Board	Enforcement bodies: HMRC NMW, EAS and GLAA	Improving focus and effectiveness
2024 to 2025	5	I Recommend the three enforcement bodies engaging work closely with wider work in the artificial intelligence space (AI), either within government, or drawing on expertise in the private business or academic sectors. Furthermore, I would like the three enforcement bodies to share their learning between each other and with ODLME and the LME board to enhance wider understanding of the implications of AI within the enforcement bodies remit and ODLME's work.	Little progress	Reporting quarterly to the LME Board	Enforcement bodies: HMRC NMW, EAS and GLAA and the ODLME	Improving focus and effectiveness
2024 to 2025	6	The enforcement bodies have explained to me that promoting compliance, especially in the SME community is very labour intensive. I believe there may be scope to magnify broadcasting and compliance through forging links with 39 growth hubs in England and equivalent in Scotland Wales and Northern Ireland. I recommend that the 3 enforcement bodies highlight the promotional compliance within the SME community using the reach of growth hubs, perhaps taking one or two hubs each, and reporting back to the LME Board.	Some progress	Reporting quarterly to the LME Board	Enforcement bodies: HMRC NMW, EAS and GLAA	Engage and support

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2024 to 2025	7	I recommend that the three enforcement bodies: - undertake a combined piece of work to track the entry points and map the process is followed by complainants, particularly when the complaint comes to one agency but requires the attention of another or where one of the three enforcement bodies received a complaint or report from another statutory body. - report to the LME board whether/ how the process is within the three enforcement bodies and might be streamlined.	Little progress	End financial year 2024 to 2025	Enforcement bodies: HMRC NMW, EAS and GLAA	Engage and support
2024 to 2025	8	1) I recommend that EAS/ HMRC NMW/DBT establish a stronger evidence base to determine the extent of lack of provision of comprehensive and accessible payslips and/or Key Information Documents. 2) Dependent on the outcome of the above, consider how it can further promote and enforce use of clear, timely and accessible payslips and or more informative KIDs.	Some progress	End of financial year 2024 to 2025	DBT, HMRC NMW and EAS	Engage and support
2024 to 2025	9a	I recommend that with the help of community organisations who are promoting workers' rights in the community they serve, the three enforcement bodies pilot the enhancement of their communications to workers at risk of exploitation by co-producing communications in east-to-read versions and alternative formats.	Some progress	Progress report to LME Board December 2024	Enforcement bodies: HMRC NMW, EAS and GLAA	Engage and support

Year	No	Recommendation text	Rating	Time scale	Lead body	Theme
2024 to 2025	9b	I recommend ODLME engages with Greater Manchester combined authority and Scottish government to explore how, through existing initiatives, increasing prominence and support for community organisations improve business compliance and prevent labour exploitation.	Good progress	By the end of the financial year 2024/25	ODLME	Engage and support
2024 to 2025	10	I recommend that the three enforcement bodies, the SCG and other enforcement providers take further steps to deepen and broaden their interfaces and mutual understanding that go beyond joint working operations. This could include shared learning, threat assessment, promoting compliance.	Little progress	Reporting quarterly to the LME Board	SCG and enforcement bodies: HMRC NMW, EAS and GLAA	Better joined-up thinking
2024 to 2025	11	I recommend that, within the next six months, an assessment should be made of the joint approach associated with adult social care sector, looking at the risk assessments, the collaborative working, the sharing of data, availability of resources, communication and compliance with a particular focus on the roles of ODLME, its information hub, the three enforcement bodies and key partners.	Good progress	Reporting to the LME Board by end of financial year 2024/25	ODLME and enforcement bodies: HMRC NMW, EAS and GLAA	Better joined-up thinking
2024 to 2025	12	I recommend that the three enforcement bodies and the sponsor departments, undertake collective strategic thinking examining the respective impact of different approaches to achieving compliance: e.g. naming and shaming, geographical compliance approach, licensing, penalties, inspection programmes, communication campaigns with ODLME playing a facilitation role.	Little progress	Reporting to the LME Board by spring 2025	Enforcement bodies: HMRC NMW, EAS and GLAA; DBT and Home Office; ODLME	Moving to FWA

Annex B: Table of recommendations still in progress when the 2020 to 2023 annual report was published

Year	No.	Recommendation Text	Rating	Timescales	Lead Body	Sector/Theme
2020 to 2021	1	The Labour Market Enforcement (LME) bodies should strengthen their relationship with care regulators across the devolved administrations by:	Some Progress	Dec 2024	All bodies	Social Care/ Better Joined up Thinking
		a) Raising their profile and ensuring their powers and remit are well-known in the sector;				
		b) Providing active support in the training of inspectors, enabling them to spot the signs of labour exploitation; and	Little Progress	Dec 2024	All bodies	
		c) Reviewing existing gateways and processes to ensure smooth intelligence-sharing and referrals between the LME bodies and the care regulators, including effective signposting to each other's complaints/ whistleblowing routes.	Little Progress	Dec 2024	All bodies	
2020 to 2021	6	In line with my wider argument around robust voluntarism, the Gangmasters and Labour Abuse Authority (GLAA) should work with the sector to explore how it can lend credibility and support to the labour standards and compliance elements of high-quality certification schemes for growers. Working with a strengthened licensing system, this would allow the sector to be more confident about compliance throughout the supply chain, without relying on multiple, sometimes poor standard ethical compliance audits.	Little progress	Dec 2024	GLAA	Agriculture/ Better Joined up Thinking

Annex C: Abbreviations and acronyms

Acas: Advisory, Conciliation and Arbitration Service

AI: Artificial intelligence

ALP: Association of Labour Providers

ARG: Analysis and Research Group

AR: Annual Report

ASC: Adult Social Care

CCLA: Churches, Charities and Local Authorities

CV: Curriculum Vitae

CQC: Care Quality Commission

DBT: Department for Business and Trade

DHSC: Department of Health and Social Care

DEI: Diversity, Equality and Inclusion

DEFRA: Department for Environment, Food and Rural Affairs

DSIT: Department for Science, Innovation and Technology

DLME: Director of Labour Market Enforcement

EBs: Enforcement Bodies

EAS: Employment Agency Standards Inspectorate

EEA: European Economic Area

ERB: Employment Right Bill

ESG: Environmental, Social and Governance

EU: European Union

FLEX: Focus on Labour Exploitation

FWA: Fair Work Agency

FTSE: Financial Times Stock Exchange

GCA: National Minimum Wage Geographical Compliance Approach

GDP: Gross Domestic Product

GLAA: Gangmasters and Labour Abuse Authority

HCW: Hand Car Wash

HMRC NMW: HM Revenue and Customs National Minimum Wage

HO: Home Office

HSE: Health and Safety Executive

IASC: Independent Anti-Slavery Commissioner

JSTAC: Joint Slavery and Trafficking Analysis Centre

KID: Key Information Document

LA: Local Authority

LGA: Local Government Association

LME: Labour Market Enforcement

LMEG: Labour Market Evidence Group

LMEU: Labour Market Enforcement Undertaking

LPC: Low Pay Commission

MAC: Migration Advisory Committee

MoU: Memoranda of Understanding

MSPEC: Modern Slavery Policy and Evidence Centre

NAO: National Audit Office

NCA: National Crime Agency

NHS: National Health Service

NGO's: Non-Government Organisations

NICs: National insurance contributions

NLW: National Living Wage

NMW: National Minimum Wage

NRM: National Referral Mechanism NTU: Nottingham Trent University

OBR: Office for Budget Responsibility

ODLME: Office of the Director of Labour Market Enforcement

ONS: Office for National Statistics

SCG: Strategic Coordination Group within ODLME

SCP: Strategic Communications Plan

STPO: Safety Trafficking Prevention Order

STRO: Safety Trafficking Risk Order

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