



HM Government

Lessons learned from Operation Tacit

Labour non-compliance in the garment
manufacturing industry in Leicester

Director of Labour Market Enforcement
Margaret Beels

November 2025



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1. Background to the review

1.1. This is a review into Operation Tacit undertaken by the Director of Labour Market Enforcement, a position created by the Immigration Act 2016. The Director of Labour Market Enforcement is responsible for preparing a strategy for the following enforcement bodies (as defined as such through the review):

- Employment Agency Standards Inspectorate (EAS)
- Gangmasters and Labour Abuse Authority (GLAA)
- HMRC National Minimum Wage (HMRC NMW)

1.2. This review covers the period from the initial pilot operation in the industry in 2020 through to the initiation of Operation Tacit in 2022 and investigations undertaken by the enforcement bodies.

1.3. Operation Tacit addressed allegations of modern slavery and labour exploitation in the garment industry in Leicester. It represented at the time the largest joint working exercise undertaken into non-compliance in the UK labour market, calling on wide cross government and regulatory partners including:

- Gangmasters and Labour Abuse Authority
- HM Revenue & Customs (including National Minimum Wage enforcement)
- Employment Agencies Standards Inspectorate (then Department for Business, Energy and Industrial Strategy now the Department for Business and Trade)
- Health and Safety Executive
- Leicestershire Police
- National Crime Agency
- Leicester City Council
- Department for Work and Pensions
- Home Office Immigration Enforcement
- Leicestershire Fire and Rescue Service

1.4. I recognise the commitment and work that went into Operation Tacit.

1.5. While this review reflects on the official response within Operation Tacit and the response from regulatory and law enforcement partners, there were ongoing efforts from the local council and industry which resulted in additional initiatives occurring alongside the operation. I discuss this in Part 2.

1.6. I undertook this review to understand:

- the circumstances leading up to Operation Tacit
- the roles of the stakeholders involved, and the compliance and enforcement approaches used
- the impact Operation Tacit had on finding and tackling labour exploitation in the Leicester garment sector
- the balance between the costs (including opportunity costs) and benefits of undertaking Operation Tacit
- lessons learned to inform future sector and geographic focused multi-agency enforcement interventions

1.7. This review was presented in December 2023 reporting on the assessment at that time. The review was re-presented in July 2025, as the Director believes, notwithstanding the passage of time since Op Tacit was undertaken, there is still merit in presenting her recommendations and observations. There are useful initiatives underway to support growth of a compliant garment industry in Leicester and these need to be encouraged.

2. Summary and key recommendations

Part 1 – Operation Tacit

2.1. Operation Tacit was launched in July 2020 on the back of media articles and allegations of modern slavery in the garment industry in Leicester from a local MP. Ministers required that action must be taken to identify where this was happening and deal with it. The enforcement bodies had been engaged in Leicester for a number of years and did not view the garment industry as high risk in relation to other manufacturing sectors. However, the information presented by the enforcement bodies in relation to the garment industry in Leicester did not reassure ministers. This triggered a high-level multiparty response inviting stakeholders, including those enforcement bodies who were already planning activity in the area.¹

2.2. Ministers sought an immediate response and enforcement resources were deployed at pace. There was limited opportunity to properly define the problem for subsequent operational intervention.

2.3. In my view, the agencies collectively needed more time to consider the evidence and the right operational response. They needed to determine the outcomes being sought, the level of resources to be used and to formalise the multi-agency arrangements to adjust them as necessary during the lifecycle of the operation. As part of planning, an analysis needs to be made as to whether the necessary data sharing protocols are in place between all the relevant enforcement partners who were to carry out the enforcement activity.

Recommendation 1: To ensure planning for similar operational interventions in the future is founded on a robust assessment of the available evidence I recommend the enforcement bodies develop a joint collective procedure for handling such responses.

2.4. This procedure should provide a baseline assessment of the risks and threats within that industry as well as anticipate the resources needed to ‘surge’ a response. I recognise making an estimate of the resources to be deployed is bound to be difficult. As was the case with Operation Tacit there may not be a full picture of the number of businesses that would be of interest. This makes it difficult to plan from the outset for the resources needed to address an issue. But on the other hand, there cannot be an open-ended commitment. A phased approach may be needed. As such the procedure should remain agile to consider risks in other sectors and serve as a proposal to ‘surge’ joint working initiatives.

¹ HMRC is a non-ministerial department and as such cannot be directed by ministers to take action. HMRC NMW regard the work that they undertook in Leicester at the time of Tacit as operationally distinct from Tacit. However they did work collaboratively with other enforcement bodies, notably with GLAA.

Recommendation 2: The joint procedure recommended should also include agreement on the overall intelligence picture, the nature of the operational response and the initial and ongoing enforcement resources required (taking into consideration the opportunity costs of redeploying resources from existing operational activity).

2.5. At the beginning of Operation Tacit much was made of the need to share data between enforcement bodies with an imperfect understanding of the legal gateways and established protocols already in place. Given that potentially a wide range of enforcement partners can be involved in an exercise of this nature, there needs to be clarity over what data can be shared with whom under existing protocols and whether additional legal gateways need to be created.

Recommendation 3: At the outset of future operations like Operation Tacit, the enforcement partners should establish at pace whether data sharing protocols additional to those already in place between critical enforcement partners are needed. Such data sharing protocols should comply with legal requirements.

2.6. Operation Tacit was in a sector where the flow of intelligence is very limited. There needed to be better public communications, both to help improve information flows and to reassure the public that enforcement interventions were happening. Operation Tacit continued over more than a 2-year period with a great deal of interest in whether the enforcement bodies were successfully identifying and bringing to justice those who were exploiting workers. Only GLAA periodically issued high-level reporting of Operation Tacit activity. Despite extensive operational activity taking place, there was frustration where external stakeholders felt they were not regularly informed of progress. Where investigations can take time, this can give the impression there has been a lack of action to address non-compliance, resulting in loss of public confidence and engagement in the response. A different approach is needed to provide the wider audience, and those subjected to exploitation, with a sense that it is worth running the risk of providing information to the enforcement bodies and a belief that their reports will be taken seriously.

Recommendation 4: To help improve intelligence flows and increase public confidence in the operational response I recommend the enforcement bodies develop and execute a joint communications plan during major operations.

Cost-benefit analysis of Operation Tacit

2.7. The enforcement bodies have not been willing to disclose for publication any estimates of their resourcing costs incurred by Operation Tacit. Without this it is impossible properly to report on the effectiveness of the operation and hence demonstrate whether this intervention represented a good use of public funds. I am told by the enforcement bodies that they would have approached the issue differently. Indeed, the Strategic Co-ordination Group² (SCG) was developing a plan which was overtaken by the ministerial intervention. The recommendations made above are therefore intended to give confidence in an alternative approach for similar interventions in the future which might be more cost effective.

² The Strategic Co-ordination Group is a multi-agency meeting chaired by ODLME.

Part 2 – Additional measures to support greater compliance in the Leicester garment industry

2.8. The actions that need to be taken to create a vibrant and sustainable garment industry in Leicester go far beyond the remit of the Director of Labour Market Enforcement. I recognise that I have no formal jurisdiction in respect of the recommendations in Part 2 of this report.

2.9. Within Operation Tacit, there have been efforts as regards promoting compliance and preventing non-compliance. This promotional activity needs to continue. The ongoing activity as regards 'Prevent' needs to have a strong local focus. Leicester City Council (LCC) has the single strongest interest in seeing a thriving garment and textile industry in Leicester. The council is also best placed to understand its own vicinity and what is happening on the ground. I note that the council no longer funds an individual to champion compliance in the Leicester garment industry.

Recommendation 5: Accordingly, I would welcome the Leicester Labour Market Partnership being re-vitalised with the positive intent of promoting a sustainable quality fashion industry in Leicester.

2.10. There are lots of good innovations and examples of activity seeking to improve the ecosystem surrounding the garment industry. In particular, the work done by the Leicester Fashion Academy, the Fashion Advice Bureau – Leicester (FAB-L) initiative, the Trades Union Congress (TUC) led Workplace Support Agreements, the work of the Apparel and Textile Manufacturers Federation and others.

Recommendation 6: I would welcome Leicester City Council being proactive in facilitating dialogue between the brands and the suppliers to embed a new future for the garment industry in Leicester including new infrastructure investment and ongoing skills training and a fair approach to supply chain management.

2.11. Many of the initiatives that will serve to support a quality garment industry in Leicester are subject to short term funding – for example FAB-L, the Skills Academy, the LCC project co-ordinator. The embedding of good practice, the creation of sustained arrangements for the worker voice to be heard, whether via unionisation or in other ways such as community hubs, will not happen quickly. The Garment and Textile Workers Trust provides a funding mechanism. Boohoo has taken the lead, but the initiative needs support from all brands.

Recommendation 7: I would welcome the Garment and Textile Workers Trust convening a summit to agree the longer-term funding of community-based initiatives to support garment workers in Leicester involving brands, Apparel and Textile Manufacturers Federation manufacturers, LCC, the Garment Trust, Trade Union Congress, trade unions and community leaders.

2.12. The Low Pay Commission Report 2022 recommended the DLME, in light of Operation Tacit, takes a view on whether there is a case for further regulation in the textile sector. There are two options that have been floated: licensing within the garment manufacturing industry and the creation of a garment adjudicator whose role would be to act as a court of appeal for suppliers who feel subject to unfair pressure from brands and wholesalers. I believe that the supply chain might operate more fairly if such a position existed.

2.13. The recommendations I make in Part 2 of this report go beyond my vires as Director of Labour Market Enforcement but represent my view as to steps that would improve the health and sustainability of the garment industry in Leicester. I am not convinced that further statutory regulation is the answer.

3. The garment industry in Leicester

3.1. In Leicester, the garment industry has been composed of small factories concentrated in a specific part of the city which supplies large scale ‘fast fashion’ retailers. This has led to competition between the factories to produce garments at lower cost which can make it difficult to maintain compliant business practices. There are differing estimates of the number of factories in the city, with reports of 1,000 to 1,500 units 4 years ago. In 2022 the University of Nottingham Rights Lab report put the figure at 700 factories employing 10,000 workers.³ The figure is now almost certainly lower than this reflecting the economic situation and changes that came about as a result of the COVID-19 pandemic.

3.2. Leicester has a multi-cultural population with a large proportion of the workforce from an Asian or Asian British background. The Leicester garment trade is heavily resourced from this community for workers and business owners. As a result, the workforce speak a variety of languages (such as Punjabi, Gujrati, Urdu). There are also Eastern European workers who do not have English as a first language.

Industry contextual factors

3.3. Reports of exploitation of workers in the garment industry in Leicester point to a range of factors that create risk.

3.4. It is a localised industry, which, while focused on ‘fast fashion’ serving the UK market, is competing against a global manufacturing base for cheap garments.

3.5. At the time of Operation Tacit, the industry in Leicester was made up of micro, small to medium enterprises, employing the workers and supplying big brand online retailers. The full business population of the industry is not known. There is manufacturing overcapacity in Leicester. This reduces profit margins in a competitive market to supply the big retailers, providing an alleged incentive for non-compliance and risk of worker exploitation to be profitable.

3.6. A University of Nottingham survey reported that fear of losing their job was the single biggest factor in preventing workers from making a complaint, associated with the lack of alternative employment.⁴

3 <https://www.nottingham.ac.uk/Research/Beacons-of-Excellence/Rights-Lab/resources/reports-and-briefings/2022/June/Fashioning-a-beautiful-future.pdf>

4 <https://www.nottingham.ac.uk/Research/Beacons-of-Excellence/Rights-Lab/resources/reports-and-briefings/2022/June/Fashioning-a-beautiful-future.pdf>

3.7. Buyer pressure: At the time of Operation Tacit industry sources stated that it was impossible to produce the units and garments for the product or retail price and pay workers the national minimum wage. Wages of £2–3 an hour were reported in the media as “commonplace” in Leicester factories. Underpayment of workers and allegations of non-payment of holiday pay were reported by NGOs as routine. These allegations fall under the remit of the enforcement bodies and were thoroughly investigated, subject to source evidence being made available.

3.8. There is a perception that workers in Leicester accept non-compliant labour practice due to a reluctance to engage with authorities and a closed employment model where workers feel vulnerable to being blacklisted if they complain.

3.9. It was alleged that for some workers, concern about their lack of documented resident status or certainty as regards their entitlement to work means that many workers are willing to accept poor conditions in exchange for a job – even one without formal contracts or minimum wages. This concern also contributes to a risk that workers are unable or unwilling to speak out about labour rights abuses for fear of being deported or otherwise investigated, which may or may not be well founded. Their fears may also be about fellow workers as opposed to their own status.

3.10. Uncertainty as to scale of activity: as noted above there are different estimates of the size of the industry. The Low Pay Commission reported in July 2022 that it was hard to know the real scale of the textile sector in Leicester and the scale of illegal working within it. The current position remains uncertain but there have been regular reports of factories in Leicester closing due to economic pressures leading to further offshoring.

PART 1 Operation Tacit

4. Enforcement context for Operation Tacit

2018 to 2019 DLME pilot operation investigating the Leicester garment industry

4.1. Prior to July 2020 the garment industry in Leicester had already been subject to a degree of scrutiny by enforcement bodies.

4.2. Allegations of labour non-compliance were flagged in the DLME Strategy 2018 to 2019 which recommended that the enforcement bodies pilot and evaluate different forms of partnership working including working with Leicester City Council (LCC) to target the garment trade through focused, highly visible joint enforcement (testing partnerships with local agencies and businesses).

4.3. This resulted in a DLME co-ordinated multi-agency pilot in Leicester carried out in autumn 2018. About 40 to 50 visits were made to garment manufacturers.

4.4. At the same time the Health and Safety Executive (HSE) visited 22 businesses and found a number of health and safety breaches that would be expected in a small manufacturing environment. Whilst some enforcement action was taken, there was nothing to indicate significant health and safety issues that would require HSE to reassess this part of the textile industry as high risk. These findings contributed to the DLME pilot.

4.5. HMRC NMW identified issues such as pay below NMW, annualisation of pay, accommodation deductions – but nothing exceptional compared to other manufacturing industries. GLAA identified one potential case of modern slavery which they referred to the police. EAS and the police were also involved in some of the visits. EAS found no evidence of agencies involved in the supply of workers to the garment industry.

4.6. In addition, LCC engaged with over 200 businesses, which included the delivery of ethical compliance workshops aimed at raising awareness and standards.

4.7. The key findings of the Leicester pilot were:

- The operation, even though small scale, was resource intensive.
- All agencies acknowledged that one operation was not enough; there needed to be a coordinated, structured rolling programme.
- But, there remained a disconnect between the image portrayed by media and stakeholder groups and the intelligence received by enforcement bodies.
- Lack of intelligence was a major barrier to further enforcement activity.

- Opportunity for greater deterrence activity and publicity around joint activity during the pilot was not exploited.
- So far it has been business as usual rather than looking at enforcement in Leicester in a new way.

4.8. Analysis after the pilot presented ideas aimed at making enforcement more effective and using different levers to change economic drivers.

4.9. In June 2019 the then Director of Labour Market Enforcement held a meeting with the City Mayor of Leicester to recognise the critical importance of the engagement of Leicester City Council in driving up standards within the garment industry in Leicester. Subsequently Leicester City Council established the Labour Market Partnership to promote the highest standards of employment and support to Leicester's garment industry. This included recruiting a project co-ordinator to support a programme of activity and provided a communications channel. Also, GLAA pursued the possibility of creating guidance on standard rates for items using the Apparel Group,⁵ developing economic intelligence with the signatory brands and creating an awareness of legitimate cost-per-item for procurement.

Enforcement activity following the pilot

4.10. Following the pilot exercise, continued discussions at the DLME Strategic Co-ordination Group (SCG) and, using their own internal assessments, HMRC NMW recognised the ongoing threat of non-compliance and associated stakeholder interest and dedicated resources to ongoing work from 2018 to 2019 onwards in relation to the Leicester garment industry.

4.11. The Health and Safety Executive, which was part of a partnership including Leicester City Council, the Police, the NCA and the labour market enforcement bodies, sought to investigate claims of non-compliance in the garment sector and develop the intelligence picture.

4.12. In 2020, the government issued sector specific guidance on how employers should keep their workers safe during the COVID-19 pandemic, including guidance for factories and warehouses. As Great Britain's health and safety regulator, HSE maintained regulatory oversight of how duty holders were meeting their responsibilities in the context of the public health risk at the time. In June 2020 HSE announced an additional £14m for extra HSE call centre staff, inspectors, and equipment.

4.13. In June 2020 in light of emerging media reporting and allegations made in relation to COVID-19 issues, the SCG agreed to set up a proactive Tactical Group to tackle emerging issues in Leicester. The intention was to map and detail the threats and to generate further intelligence which would be developed to select those businesses where interventions would have the most positive impact. It was agreed that DWP, Leicester City Council, Leicestershire Police and the National Crime Agency should also be involved in the Tactical Group. The DLME Strategic Co-ordination Group cautioned against early or incomplete action, as the sector's issues might involve sophisticated, deliberate non-compliance, involving complicit behaviours.

Renewed escalation of issues in July 2020

4.14. The then Home Secretary, responding to media interest including allegations from a local MP of endemic modern slavery in the Leicester garment industry,⁶ potentially involving "thousands" of victims, required that action be taken. In addition to the modern slavery allegations under the NCA's remit, there were additional allegations of potential serious and organised crime further increasing the pressure to respond. This resulted in high level discussions in the

⁵ Further information for the Apparel and General Merchandise Public Private Protocol Group can be found on section 7.17.

⁶ <https://news.sky.com/story/leicester-up-to-10-000-could-be-victims-of-modern-slavery-in-textile-factories-12027289>

Home Office and a programme of urgent activity was agreed of which Operation Tacit was one workstream, seeking to create opportunities to disrupt non-compliant or criminal behaviour in the industry.

4.15. It was recognised that other work also needed to take place in parallel: a mapping of which bodies should be involved; what intelligence they gather and what powers they have. This would drive better intelligence sharing. Better bottom-up relationships with the community should be built so that potential witnesses feel confident reporting issues. Opportunities should also be explored to strengthen existing regulation of the textiles industry or consider new regulation, to target labour abuse in this sector.

4.16. In the light of a Sunday Times report on 5 July 2020⁷ relating to boohoo's activity in Leicester, boohoo itself commissioned an independent enquiry conducted by Alison Levitt QC. She reported in September 2020.⁸ Boohoo then embarked on its response, Agenda for Change.⁹ (See Part 2)

Operation Tacit

4.17. The partnership of stakeholders at the start of Operation Tacit provided a variety of powers to assess the risks in the sector and undertake appropriate action. However, as the operation developed and the more serious labour exploitation or immigration offences were not identified, the operation evolved into one where GLAA and HMRC NMW were the primary agencies in investigating potential non-compliance. The wider stakeholders, while taking a less active role, remained on board to provide support and resources where requested.

4.18. A management structure was put in place using the conventional Gold, Silver and Bronze structure and GLAA was nominated to provide the leadership at all 3 levels. Gold command reported into a senior interdepartmental group chaired by Home Office and the Department for Business, Energy and Industrial Strategy (BEIS, now DBT), providing reports into ministers. HMRC operated in parallel to this arrangement, reflecting their operational independence.

Success measures

4.19. As Operation Tacit was undertaken by law enforcement bodies, the potential success measures were orientated towards law enforcement outcomes rather than compliance outcomes.

4.20. However, it was recognised that success would also be measured by looking at:

- volume and quality of intelligence – improvements in the volume and assessed quality of intelligence gathered.
- improving the commerciality of legitimate and compliant businesses – those demonstrating good labour practises have long been at a disadvantage set against those breaching minimum wage regulations, those using smaller cramped and dangerous workspaces, those who compel people to work even when it isn't safe.
- engagement – volume of engagement, resulting information referrals and assessments of quality, impressions and take up of information published (evidence of prevention effects).
- victim identification – identifying more victims of labour exploitation will mean they can receive support and also help to inform the picture around the threat.

⁷ <https://www.thetimes.com/uk/politics/article/boohoo-fashion-giant-faces-slavery-investigation-57s3hxcth>

⁸ Independent Review into the boohoo group Plc's Leicester supply chain [final-report-open-version-24.9.2020.pdf](#)

⁹ [Publication of and response to Independent Review](#) (from boohoo group plc)

- in a disruption framework model success will also come from where agencies beyond labour exploitation have been able to act to improve safety and compliance, for example factories found with chained up fire escapes may not be putting workers at risk from exploitation but clearly they are breaching fire safety rules.

Communications strategy

4.21. In July 2020, GLAA prepared a communications strategy for Operation Tacit. It proposed the governance of the strategy with the Gold and Silver commands being the nominated key spokespersons. The strategy was prepared with the intention of ensuring partner agency colleagues, wider stakeholders and the public were aware of the taskforce, to enhance trust and confidence in its capability to deal with the issues and to maintain and enhance effective relationships with key stakeholders across Leicester to encourage buy-in and support for the task force's work.

4.22. The main message to workers was their right to safe work without the risk of exploitation. Workers were to be encouraged to report via the Modern Slavery Helpline (rather than NMW contact points) and to see enforcement as a supportive activity for workers. Community engagement was seen as key. The communications strategy proposed using media (local, regional and national) and also targeted communications to stakeholders using digital and social media.

4.23. Leicester City Council also engaged in seeking to communicate with the community about the importance of high standards in the industry and how to report non-compliance.

Focus on HMRC NMW and GLAA activities in Operation Tacit

4.24. As noted above, the allegations of the most severe exploitation were not supported when activity got underway and subsequently the majority of enforcement related activity was undertaken by HMRC NMW and GLAA. Operation Tacit partners continued to provide support where required.

4.25. Recognising ongoing public concern about the garment industry in Leicester, HMRC NMW used the period between the Pilot and Operation Tacit to develop an enhanced compliance approach from a number of different perspectives.

4.26. This enhanced approach included:

- multiple source intelligence development, enhancement and risk analysis
- cross HMRC liaison with HMRC Tax Taskforces
- use of internal and external data by HMRC NMW
- better understanding of the industry's business model
- upskilling HMRC NMW officers to improve understanding of the sector
- testing hypotheses with additional data sources

4.27. Individually, these weren't new methods but Operation Tacit adopted a scaled-up approach using greater co-ordination to test and develop all the information for the joint HMRC NMW and GLAA visits and subsequent investigations.

5. Outcomes from Operation Tacit

5.1. As previously mentioned, Operation Tacit involved a wide array of partners undertaking joint activity to support the operational objectives. The figures presented below relate to the activity taken by the enforcement bodies under my remit.

5.2. In the period July 2020 until January 2023 HMRC NMW visited 318 garment manufacturing premises and interviewed workers. Some of the worker interviews were at the place of work; others took place at community centres and included interviews in languages other than English.

5.3. The level of non-compliance discovered by HMRC NMW was lower than the average level found in other investigations and was broadly in line with other investigations in the manufacturing sector. Thirty-six notices of underpayment were issued and £199,515 payments of arrears to workers were identified. In addition, 4 Labour Market Enforcement Undertakings were issued in relation to Section 31(2) National Minimum Wage Act 1998 (record keeping offences). During the period HMRC NMW also made referrals in relation to the Coronavirus Job Retention Scheme (fraud) with a significant penalty being issued in one case.

5.4. GLAA visited 524 premises, co-ordinating their activity with HMRC NMW. Issues were uncovered at 118 premises which, between them, employed around 1250 workers. Four modern slavery investigations were initiated. One Slavery and Trafficking Risk Order (STRO) was issued by the GLAA relating to kickbacks from workers made to a supervisor who was taking money from workers in a personal capacity outside of the management chain.

Issues and barriers to Operation Tacit flagged by the enforcement bodies

Lack of initial collective structured assessment

5.5. At the start of Operation Tacit there was an early imperative that rapid action must be taken. There was a perceived need to unearth the instances of modern slavery. Of course, modern slavery is a serious offence and where there is evidence, action needs to be taken. However, the scale of the resources to be committed needs to be recognised and agreed. This will not be fully apparent at the start so there need to be control points built into the system.

5.6. The lack of a collective assessment supporting the enforcement bodies own assessment of the risks and threats in the Leicester garment industry at the start of Operation Tacit was highlighted as a major concern. Having such an assessment would have provided an opportunity

to brief, with stronger evidence, Ministers and senior leaders more effectively and reduced the perceived imperative to take immediate action. It would have allowed a planned and phased response.

5.7. It is worth noting that the findings of Operation Tacit are not materially different to the findings of the 2018 to 2019 DLME led pilot exercise looking at the garment industry in Leicester. But I have found no evidence that the results of the pilot were fed into the thinking in July 2020.

Recommendation 1: To ensure planning for similar operational interventions in the future are founded on a robust assessment of the available evidence I recommend the enforcement bodies develop a joint collective procedure for handling such responses.

Recommendation 2: The joint procedure recommended above should also include agreement on the overall intelligence picture, the nature of the operational response and the initial and ongoing enforcement resources required (taking into consideration the opportunity costs of redeploying resources from existing operational activity).

5.8. Intelligence and data sharing: GLAA led the co-ordination of intelligence while HMRC had the most developed view based on their own risking and data. At the outset, there was a perception that Operation Tacit could benefit from risk profiling and bulk data manipulation drawing on HMRC data. However, there are legal barriers which limit the information HMRC can share.

Recommendation 3: At the outset of future operations like Operation Tacit, the enforcement partners should establish at pace whether data sharing protocols additional to those already in place between critical enforcement partners are needed. Such data sharing protocols should comply with recognised legal requirements.

5.9. Stakeholder entry powers: Given the number of enforcement bodies and agencies involved in Operation Tacit there was a belief that securing entry to properties where there were concerns about worker exploitation would happen. However, powers to enter a building without the consent of the owner or occupier are subject to strict conditions.

5.10. In the initial stages of Operation Tacit, there were challenges around gaining entry to premises. Most of the initial access issues related to businesses being closed due to lockdown. In some cases, businesses were deliberately obstructive. At one location there was no response when entry was sought, even though activity in the building could be heard. More rarely entry was actively refused, which raised suspicions with steps being taken for further development of evidence. There were reports of workers leaving premises by back doors when enforcement bodies arrived. During Operation Tacit 3 PACE¹⁰ warrants were issued. Where HSE inspectors were part of a visit team, their powers of entry were used when health and safety concerns were judged to require investigation.

5.11. Worker voice: one of the recurring issues highlighted in the sector is the lack of worker voice, with official union representation almost non-existent. The TUC-funded initiative FAB-L (see Part 2) is attempting to secure union access to provide both guidance for management in good practice and to secure workers' rights.

5.12. The close proximity of work opportunities within Leicester is considered to have a negative impact on workers' willingness to raise complaints and grievances as it might risk them being blacklisted from other work.

10 Police and Criminal Evidence Act 1984

5.13. Additionally, workers are often reluctant to engage with government bodies. The stakeholders have sought to overcome this through the level of engagement work undertaken. HMRC NMW have had some success by engaging with garment workers at foodbanks, using the positive reputation of the NGOs running the foodbank as a starting point and building their own reputation. Approximately 3,000 workers were given multi-lingual leaflets by HMRC NMW for Operation Tacit.

5.14. Some NGOs have long argued the potential tension between labour market and immigration enforcement. They argue that concerns about immigration status act as a barrier to reporting labour violations. In their investigations under Operation Tacit, Home Office Immigration Enforcement found only one example of illegal working. GLAA emphasise that victims of modern slavery or exploitation will, in their view, first and foremost be treated as victims. However, concern about Immigration Enforcement intervention may have affected passing relevant information to the enforcement bodies.

5.15. It was reported to me that throughout Operation Tacit that HMRC NMW did not see an increase in worker complaints. There was an increase in the volume of intelligence reports being shared, however some of that was the recirculation of the same intelligence. GLAA reported that initially there were more reports but these tailed off. Further investigation by GLAA of the July 2020 press reports and other publicly aired allegations required more information but this was not forthcoming from the sources.

5.16. The need for effective channels for workers' voices to be heard remains. The work of FAB-L demonstrates that this is a slow, bottom-up process as workers develop channels in which they have confidence. Enforcement bodies working through community organisations is also likely to be the most effective route.

5.17. Public communication: As reported in para 4.21 GLAA prepared a Communications Strategy for Operation Tacit. It had ambitious objectives that in practice proved hard to deliver. During Operation Tacit there was a great deal of interest in what the enforcement bodies under my remit were doing and whether they were successfully identifying and bringing to justice those who were exploiting workers. GLAA periodically reported Tacit activity in very broad terms, but for the enforcement bodies there is a long gap between first contact with a business and the subsequent conclusion of any investigation. This gives the impression to external stakeholders that they aren't actively engaged. I recognise that enforcement bodies are not able to provide a running commentary on operational matters. This could prejudice the outcome. I am familiar with the need to protect privacy and taxpayer confidentiality. But I do believe a better balance needs to be struck as regards communication.

5.18. One measure of success for Operation Tacit was to improve the volume and assessed quality of intelligence gathered. Providing a wider audience with ongoing updates would foster belief that it is worth a worker subject to exploitation being prepared to take the risk, as they might perceive it, to provide information to an enforcement body.

Recommendation 4: To help improve intelligence flows and increase public confidence in the operational response I recommend the enforcement bodies develop and execute a joint communications plan during major operations.

6. Analysis and conclusions

Modern slavery

6.1. Operation Tacit was triggered to address allegations of ‘modern slavery’ in Leicester. It is possible that modern slavery as defined in the Modern Slavery Act 2016 exists in Leicester. However, investigations by enforcement bodies with powers and expertise found no evidence of prosecutable offences. In 2021 the NCA reported in their National Strategic Assessment,¹¹ “Despite reports of labour exploitation, it is highly likely the industry only contains a small number of MSHT (Modern Slavery and Human Trafficking) victims” demonstrating that the threat of modern slavery was low. They did also report: “However, complex subcontracting chains and weak corporate governance lead the sector to provide a permissive environment for non-compliance and labour abuses, such as National Minimum Wage breaches, health and safety issues or illegal working”. However, the outcomes of Operation Tacit investigations, as reported in Section 5, show the level of non-compliance to be low. The situation will, of course, continue to be assessed by NCA as part of their overall evaluation of the risk of modern slavery in all its manifestations in the UK.

6.2. Garment workers in Leicester may well feel trapped by their circumstances and the factors that lead to this are complex. They relate to education, skills, social mobility, community and cultural norms. Workers may experience poor behaviours from their supervisors. Using the language “modern slavery” to describe their situation may reflect how workers feel, but the behaviours, however reprehensible, do not pass the statutory test of “forced or compulsory labour”. Allegations of ‘modern slavery’ risk the deployment of the wrong resources to address the problem and importantly giving workers the sense that the real issues they are experiencing are downplayed by the authorities because they do not meet the higher threshold.

6.3. Moreover, using the language of modern slavery could also have had a negative impact on the industry. For example, repetition of the allegations of modern slavery were used to make a formal complaint for a potential customs case in the USA citing modern slavery in Leicester based on prevailing narratives and allegations.¹²

¹¹ <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/533-national-strategic-assessment-of-serious-and-organised-crime-2021/file> (published in May 2021)

¹² <https://www.bbc.co.uk/news/uk-england-leicestershire-56251215>

The extent of labour exploitation and the role of enforcement

6.4. University of Nottingham research in April 2022 reported on a survey of workers identified through two community centres. Of the 108 respondents 72 per cent indicated they had experienced problems with their current or most recent workplace. The most common being paid below the minimum wage, as well as not getting holiday pay or sick pay, not being issued with a work contract or not being able to take holiday. Roughly one quarter said they had no concerns to raise. The report itself recognises that the survey sample cannot claim to be statistically representative of the Leicester garment industry as a whole, though the demographics of those sampled broadly matches the demographics of the garment industry workforce. The report did not evidence the extent to which the workers' views about being underpaid were tested.

6.5. Ethical auditors have reported to me that they have found evidence of multiple clocking in systems in factories and have undertaken analysis that seems to suggest that the actual throughput of factories exceeded that declared for tax purposes – suggesting also that workers' hours were longer than those declared on payslips.

6.6. Operation Tacit represented the largest joint working exercise ever undertaken into aspects of labour non-compliance, where risks were identified, and where all the information and intelligence was developed and subsequently investigated.

6.7. Thorough risk assessments were made. While non-compliance in the sector has been identified, the levels and severity support previous assessments by enforcement bodies of non-compliance in the sector being at the lower end of the spectrum.

6.8. The overall findings of Operation Tacit were that the degree of non-compliance with NMW in the garment sector in Leicester was lower than they find in other manufacturing, and worker exploitation that amounts to forced or compulsory labour as defined by the Modern Slavery Act 2015 was not found.

6.9. The University of Nottingham Rights Lab research and Operation Tacit are two distinct approaches which give different answers. The ongoing challenge is to improve the quality and quantity of information from workers.

6.10. I also conclude that while enforcement has an important role as regards worker exploitation in the garment industry in Leicester, it is not possible for any regulatory body to enter every business and conduct thorough investigations. Day to day compliance also requires having business models that work and this requires the industry itself to address issues. This means addressing issues such as purchasing practices, one sided variation in the terms of contracts that favour the brands, supply chain due diligence, listening to the worker voice, transparency as regards employment terms and sharing audit findings. These are discussed further in Part 2.

Operation Topaz

6.11. It is pleasing that lessons learned from Operation Tacit are being incorporated into Operation Topaz, a multi-agency enforcement initiative set up in May 2022, which is to investigate a range of allegations about labour non-compliance in the adult social care sector.

6.12. Operation Topaz has been more open to following the evidence, with less pressure to achieve a specific outcome. Allowing more planning, developing a structured approach and consistent proactive messaging has facilitated the creation of space to allow the enforcement bodies to undertake their work. Also, Operation Topaz has adopted an approach of creating and testing hypotheses within the investigations. This approach grew out of the experiences in Operation Tacit and has proved useful.

Post Operation Tacit picture

6.13. Although Operation Tacit has concluded, this does not mean the conclusion of work within the sector. As with all sectors, there will be ongoing analysis of the risk and response to engagement and complaints. GLAA and HMRC continue to undertake enforcement activity where appropriate.

6.14. The enforcement bodies are continuing activity in Leicester. GLAA continues to engage with stakeholders and HMRC NMW has a rolling timeframe to undertake repeat visits and examine changes in companies (such as ceasing trading or changes in directors) and potential phoenixing. While phoenixing is an approach that employers use across the entire UK, this does not appear to be any more prevalent in Leicester.

6.15. The footprint of the garment manufacturing industry in Leicester has reduced substantially, with consolidation of some suppliers where larger businesses have absorbed smaller manufacturers. Other manufacturers have gone out of business.

6.16. Additionally, the actions of the brands in tightening up their supply chains coupled with the engagement of ethical auditors can be expected to have reduced non-compliance.

PART 2 Wider activity in the Leicester garment industry

7. Additional measures to support greater compliance

7.1. The actions that need to be taken to create a vibrant and sustainable garment industry in Leicester go far beyond the remit of the Director of Labour Market Enforcement. I recognise that I have no formal jurisdiction in respect of the recommendations in Part 2 of this report.

7.2. Enforcement is but one tool to use in tackling non-compliance. Within Operation Tacit, as well as 'Pursue' there were significant efforts as regards 'Prevent'.¹³ However, GLAA and HMRC NMW are national bodies and need to pull back from intensive engagement with Leicester City Council to promote compliance. That said, 'Prevent' activity needs to continue requiring a strong local focus, including through community-based initiatives.

7.3. Operation Tacit coincided with activities by businesses and other organisations to address concerns. This included bringing together businesses and other stakeholders and other initiatives to improve the worker voice. There are indications that the industry understands their principal role in delivering a compliant industry. Initiatives like setting up the Apparel and Textile Manufacturer's Federation provides a vehicle for promoting standards. But these initiatives have to be well founded with strong ethical principles and achieve majority support within the industry, starting with the fashion brands themselves.

boohoo

7.4. Press articles and the Labour Against the Label report¹⁴ in June–July 2020 specifically highlighted concerns with manufacturers who were supplying boohoo, a major player in the garment industry in Leicester. In response to this on 8 July 2020 boohoo appointed Alison Levitt QC to conduct a review. In September 2020 her review reported:

"(2) I am satisfied that the allegations about poor working conditions and low rates of pay in many Leicester factories are not merely well-founded but substantially true;

(3) Boohoo's monitoring of its Leicester supply chain was inadequate;

(4) whilst boohoo had put in place a programme intended to remedy this, it did not move quickly enough;

(5) Boohoo ought to have appreciated the serious risks created by 'lockdown' in relation to potential exploitation of the workforce of the Leicester factories".

¹³ The full range of activity is sometimes characterised as the 4Ps (prepare, prevent, protect, pursue) which is the approach adopted to address serious crime and labour non-compliance. Other organisations, including HMRC NMW use different terminology.

¹⁴ <https://labourbehindthelabel.org/report-boohoo-covid-19-the-people-behind-the-profit/>

She also noted that the steps which boohoo was taking in relation to remedying problems in its Leicester supply chain had been embarked on nearly a year previously as a result of processes it had itself put in place rather than just being a reaction to the negative publicity in July and August 2020.

7.5. Boohoo embarked on what they called an “Agenda for Change” to implement all 17 of the recommendations by Alison Levitt. They then appointed Sir Brian Leveson to provide independent oversight of the implementation of the Agenda for Change. Sir Brian’s fifth and final report was produced and published in March 2022. It recorded substantial progress in delivering the recommendations of the Levitt report while noting that there would continue to be challenges along the way and that boohoo would need to continue to exercise diligence in ensuring that standards were maintained both within boohoo and throughout its supply chain.

7.6. One outcome of Agenda for Change has been a significant reduction in the number of garment manufacturing businesses in Leicester supplying boohoo brands. Boohoo used a schedule of suppliers it has accredited. Boohoo also set up its own manufacturing facility at Thurmaston Lane, Leicester, to give it direct insight into manufacturing costs better to inform its own buying from suppliers.

7.7. In November 2023 there were further press reports about boohoo’s purchasing practices with a focus on the cost of making garments as against what boohoo buyers will offer to pay and post contract discounts applied by boohoo. Boohoo has indicated that claims made in the programme are misleading. They have assured me that they are not complacent about the improvements they have made in recent years, particularly in regard to working standards in their supply chain. They have invested significant time, effort and resource into driving positive change across every aspect of their business and supply chain, including undertaking internal and external audit of their suppliers.

Garment and Textile Workers Trust

7.8. The Garment and Textile Workers Trust¹⁵ was set up to provide support, advocacy and remedy for garment and textile workers, initially in Leicester. Boohoo provided initial funding of £1m. The Trust indicated that it wants to complement the ongoing work of others in the sector, not to compete with them.

7.9. In late 2021 the Trust commissioned the University of Nottingham Rights Lab to undertake a review of the experiences of frontline garment workers. The resulting “Fashioning a Beautiful Future” published in April 2022 provides insight into understanding which interventions are going to make the most difference to garment workers in their working lives, and in general, to improve their living and working conditions.

Leicester City Council

7.10. Leicester City Council states that they remain committed to promoting the textile industry as an important facet of its local economy. In convening the Leicester Labour Market Partnership, which they describe as “a unique initiative”, they aim to promote the highest standards of employment, supporting the local sector to be the best it can and to set an example for others to follow.

¹⁵ <https://gtwtrust.org.uk/>

Leicester Labour Market Partnership

7.11. The Leicester Labour Market Partnership (LLMP) involved a three-pronged approach:

- Enforcement
- Engagement with communities and partners
- Economic regeneration of the textile sector

7.12. The main objective of the LLMP was to be able to respond quickly to the needs of workers and others who may be vulnerable to exploitation across a number of fields of concern, whether that is low pay, health and safety, modern day slavery or other exploitative practices. Prior to Operation Tacit, a regular forum was held and led by Leicester City Council and Leicestershire Police and enforcement bodies, alongside other partners such as Citizens Advice. However this led to very little intelligence.

7.13. LCC has the single strongest interest in seeing a thriving garment and textile industry in Leicester. The Council is also best placed to understand its own locality and what is happening on the ground. I note that the Council no longer funds an individual to champion compliance in the Leicester garment industry following the end of the three-year Labour Market Partnership initiative.

Recommendation 5: I would welcome the Leicester Labour Market Partnership being revitalised with the positive intent of promoting a sustainable quality fashion industry in Leicester.

Leicester Fashion Technology Academy

7.14. In November 2021 Leicester City Council launched the Leicester Fashion Technology Academy, working with leading skills delivery provider Fashion Enter and industry partners. They have invested £300,000 to establish and launch this initiative to support its first 2 years of operation. The Academy offers apprenticeships and accredited training for people who work in, or want to work in, the textiles industry. Trainees are now enrolled and learning garment making skills as well as learning about workplace rights and responsibilities.

Fashion Workers Advice Bureau – Leicester (FAB-L)¹⁶

7.15. This initiative is to promote workers' rights and give workers a voice. TUC (working with some of the fashion brands) has funded two community-based workers operating out of the Highfields Centre to provide independent advice and support across a wide spectrum of needs to garment workers and their families. The community workers also promote trade union access to manufacturers' premises. The union representatives (GMB and Unison) seek to work both with management to explain workers' rights and management's legal obligations, and to support workers themselves. Funding is for 2 years. This is part of a spectrum of support to individuals provided by the Highfields Centre working with local representatives of NGOs such as Hope for Justice.

7.16. FAB-L interventions benefit from local knowledge and the local threat of reputational damage. FAB-L reports that in the first year of its existence they recovered a total of £110,000 in wages for garment factory workers, including £90,000 from one factory for around 60 workers. FAB-L reported that shortly after the money was recovered the factory closed so the FAB-L intervention was just in time for the workers. In the first 8 months of 2023/24 FAB-L reports that

¹⁶ <https://highfieldscentre.ac.uk/fabl/>

it has recovered a further £25,000 worth of wages, including from firms who subsequently have ceased trading. All the workers complained to FAB-L after their employment with the factory had ended.

Apparel and General Merchandise Public Private Protocol (AGM PPP)

7.17. In December 2018 some of Britain's biggest fashion retailers joined forces with enforcement bodies through the Apparel and General Merchandise Public and Private Protocol (AGM PPP) which committed signatories to work together to raise awareness in preventing worker exploitation, protect vulnerable and exploited workers, disrupt exploitative practices and help bring criminals to justice.

7.18. In October 2020, recognising the need to act together, particularly to address unethical practices in UK fast fashion, a wider group of stakeholders came together to work collaboratively within the AGM PPP structure. This group consisted of brands, government agencies (including HMRC NMW and GLAA), non-governmental organisations, Leicester City Council, and other stakeholders involved in workers' rights. The group has worked very hard to encourage good purchasing practices and there have been useful initiatives developed by members of the group. However, due to the complex and large group, with different agendas, it has been very difficult to deliver. The group has now dissolved, though quarterly Apparel and General Merchandising Stakeholder Update Meetings are being organised by Fast Forward.¹⁷

7.19. A separate initiative involving some of the AGM PPP participants was the Joint Responsibility Agreement which sought to improve employment practices in Leicester and to require improved purchasing practices on the parts of the brands. The TUC, working with some of the brands, notably ASOS, produced a framework of guiding principles to turn into a legally binding document which brands, suppliers and trade unions would sign. However, progress with this initiative has stalled and the union focus is now on setting up Workplace Support Agreements.

Workplace Support Agreements

7.20. TUC Midlands is supporting the unions GMB and Unite, to embed Workplace Support Agreements (WSAs) with large clothing brands. The WSAs require a commitment from brands and their suppliers to enable a new form of trade union, community organisation or employer engagement. The key provision under the WSA is that community and union organisers have access to the factories in the brands' supply chains in Leicester to speak with workers. Where union representatives accompany community organisers, WSAs enable unions to perform basic union functions in workplaces where there might not be any active union members. This helps workers organise themselves and provides the industrial expertise of the union to both workers and management.

Apparel and Textile Manufacturers Federation¹⁸

7.21. The ATMF has been formed as a platform to 'regenerate and revolutionise' the British textiles sector by being advocates of change to help improve standards, and use innovation to create value added production.

¹⁷ Fast Forward, operated by Stronger Together, is a UK labour standards, education, audit and improvement initiative (<https://www.fastforwarduk.org/>). The Apparel and General Stakeholder Update Meetings aim to facilitate ongoing collaborative efforts and share industry insights with a wide group of stakeholders

¹⁸ <https://www.atmf.co.uk/>

7.22. The boohoo review found that, at the time, non-compliance was widespread. While competition is part of commercial activity, it is in the interests of industry that non-compliance is challenged to provide a level playing field. The role of industry in addressing non-compliance and being advocates for good practice is crucial.

Recommendation 6: I would welcome Leicester City Council being proactive in facilitating dialogue between the brands and the suppliers to embed a new future for the garment industry in Leicester including new infrastructure investment and ongoing skills training and a fair approach to supply chain management.

7.23. Many of the initiatives that will serve to support a quality garment industry in Leicester are subject to short term funding – for example FAB-L, the Leicester Fashion Technology Academy, the LCC project co-ordinator. The embedding of good practice, the creation of sustainable arrangements for the worker voice to be heard (whether via unionisation or in other ways such as community hubs) will not happen quickly. The Garment and Textile Workers Trust provides a funding mechanism. Boohoo has taken the lead but the initiative needs support from all brands.

Recommendation 7: I would welcome the Garment and Textile Workers Trust convening a summit to agree the longer-term funding of community-based initiatives to support garment workers in Leicester involving brands, Apparel and Textile Manufacturing Federation, manufacturers, LCC, the Garment Trust, TUC, trade unions and community leaders.

Outlook for the garment industry in Leicester

7.24. Actions of the brands in tightening up their supply chains coupled with the engagement of ethical auditors can be expected to have reduced non-compliance. Boohoo for example recommended the electronic monitoring of supplier capacity in their final report, to be implemented within 12 months. This along with other factors such as costs pressures and takeovers has removed some of the subcontracting capacity.

7.25. Furthermore, e-tailers continue to look to other countries to outsource manufacturing such as Morocco, Tunisia, Turkey, Pakistan, India and China where wages are much lower than in the UK, reducing the requirement for this type of manufacturing in the UK. On the other hand, Leicester has the advantage of proximity to the market.

7.26. Most recently there has been a significant downturn in orders placed with garment manufacturers in Leicester associated with the impact of higher inflation on consumer spending, and concerns about recession. Orders placed have been cancelled with no or inadequate recompense for costs incurred. This can then feed through to workers not being paid properly. One manufacturer estimated that over 150 factories had closed in recent months. This downturn increases the risk of worker exploitation in a situation where some work is better than none.

7.27. But there should be a place for garment manufacturing in Leicester and scope for this to be based on higher value products – building on the upskilling potential of initiatives such as the Leicester Fashion Technology Academy. This could ensure that workers are properly remunerated because the value of the product is higher.

Potential further steps

7.28. The Low Pay Commission Report 2022 recommended that the DLME, in the light of Operation Tacit, take a view on whether there is a case for further regulation in the textile sector. There are two options that were considered: licensing and a garment adjudicator. A further option, avoiding the need to create a new body, might be to widen the scope of the Small Business Commissioner.

(i) Licensing

7.29. In July 2020 the UK Fashion and Textile Association (UKFT) wrote to the then Home Secretary, the Rt Hon Priti Patel, with support from more than 50 cross-party MPs and Peers and 40 retailers, investors and NGOs, calling for greater protection for garment factory workers and asking for the introduction of a “Fit to Trade” licensing scheme for garment factories.¹⁹

7.30. The government’s reply indicated concern that a licensing system would be a burden on compliant businesses and indicated the need for more evidence to inform the options to improve compliance in the Leicester garment industry. Discussions involving the British Retail Consortium and Home Office officials were promised. These did not achieve traction on the option of licensing.

7.31. I am not convinced that a workable statutory licensing scheme is a deliverable option.

(ii) Fashion and Supply Chain (Code and Adjudicator) Bill²⁰

7.32. The Private Members Bill, introduced by Liz Twist (Labour MP for Blaydon) was due for its second reading in November 2023 but is no longer being taken forward. The Bill provided for the creation of a Code of Practice to be followed by retailers of fashion clothing, footwear and accessories in their relationships with their suppliers and to set up an Adjudicator with the remit to enforce the Code of Practice and encourage compliance.

7.33. The idea of a garment adjudicator draws on the success of the Groceries Code Adjudicator. The Groceries Code Adjudicator is an independent statutory office responsible for enforcing the Groceries Supply Code of Practice and regulating the relationship between supermarkets and their direct suppliers within the United Kingdom. However, the characteristics of the food industry in the UK and the garment industry are rather different. The nature of the strong international competition faced by the UK garment industry suggests that any garment adjudicator would need to have a major international presence and the operation would be costly. The creation of such a position is not in keeping with the government’s objective of lowering the regulatory burdens on business. Equally, I believe that the supply chains might operate more fairly if such a position existed.

(iii) Small Business Commissioner

7.34. The Small Business Commissioner was set up to address delays in smaller suppliers being paid by larger businesses. It is UK wide and investigates complaints and seeks to broker arrangements acceptable to both parties. Its findings are non-binding. The advantage of using the SBC is that it builds on an organisation that already exists and some of the issues in the garment industry relate to slow payment. However, the issues in the garment industry go much wider.

¹⁹ <https://www.ukft.org/licensing-scheme-uk-garment-factories/>

²⁰ <https://bills.parliament.uk/bills/3320>

Conclusion as regards further steps

7.35. I recognise that having a garment adjudicator could create further pressure to offshore garment manufacturing. But garment workers in the UK should not be paying the price for cheap clothing. On the positive side, I believe that business models can be created for a compliant, more highly skilled, garment manufacturing industry in the UK.

