

ALP

Association of Labour Providers

OPERATION FORT ADDRESSING THE UNDERLYING CAUSES

ALP RESPONSE TO THE INDEPENDENT ANTI-SLAVERY
COMMISSIONER'S CALL TO ACTION

JUNE 2021

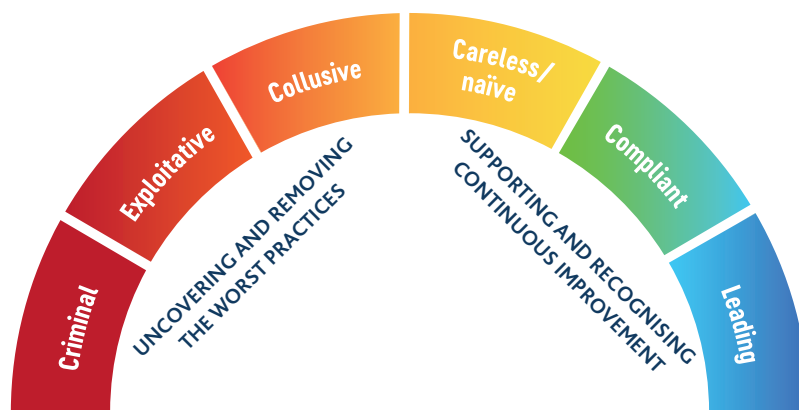
INTRODUCTION

Labour providers play a vital role in the economy by sourcing and supplying the right number of workers, with the right skills at the right time so that their clients are able to control workforce costs whilst remaining agile and responsive to customer needs. The flexibility of temporary agency working allows businesses to cover for sickness, holiday and other shortages and react quickly to additional labour requirements resulting from production variations and seasonal fluctuations. Agency working also provides a valuable source of experienced workers for permanent recruitment. With these benefits comes an obligation to provide decent work and to control inherent risks.

"It is generally accepted that temporary labour carries a higher risk of slavery. In recognition, some organisations have been increasing the proportion of directly employed workers within their operations. They have also been slimming down their lists of labour providers; building closer relationships with those working to higher standards."

Operation Fort Review, June 2020

Figure 1: Spectrum of Labour Provider Compliance, Responsible Recruitment Toolkit



Like most industries, there is a spectrum of compliance within labour provision. However, without effective due diligence, the supply of workers into high-risk sectors, by temporary work agencies provides a conduit for exploiters and crime gangs to abuse vulnerable workers, for financial gain, up to and including modern slavery.

In 2019, Operation Fort brought to justice a transnational organised criminal gang operating the largest modern slavery ring ever uncovered in the UK. Eight offenders who exploited up to 400 Polish men and women and subjected them to inhumane treatment over several years were jailed for between 3 and 11 years. The case gained widespread media attention. It was a call to action for the UK food supply chain.

Supply chains value the benefit that effective labour providers bring, and so, together with supporting organisations must collaboratively direct their efforts to:

- Identify and remove negligent and exploitative operators who undercut and undermine compliant businesses at the expense of workers and the Treasury
- Educate and support decent labour providers to embed effective management systems
- Incentivise and reward compliant and leading labour providers when awarding contracts and tenders

ADDRESSING THE UNDERLYING CAUSES

The review of Operation Fort by the Independent Anti-Slavery Commissioner '[What businesses should learn from the UK's largest anti-slavery prosecution](#)' highlighted the poor practice that had taken place, and made recommendations on the actions that business should take to ensure they are addressing the risks of slavery and trafficking in their business and supply chains.

ALP agrees with the Independent Anti-Slavery Commissioner's review and particularly highlights the following as to how the infiltration of organised crime into the food supply could happen within the most highly regulated and audited primary and industrial sectors in the UK economy:

1. Lack of effective compliance enforcement by the Gangmasters and Labour Abuse Authority
2. Lack of incentive for labour providers to improve as poor procurement practice fails to value legal compliance and responsible recruitment practices
3. Lack of clarity over how labour providers adopt good labour standards practice and how this can be monitored
4. Lack of compliance and human rights due diligence on labour supply by food producers and growers
5. Lack of requirement for compliance and human rights due diligence of the supply chain by supermarkets and others

This paper explains how ALP and its sister programmes have responded to support the UK food supply chain, and the labour providers that supply them, to address the underlying causes of how this exploitation was able to happen within the food sector. It also responds to the Independent Anti-Slavery Commissioner's recommendations to support ethical businesses to embed human rights due diligence into the DNA of their organisation and supply chain – so that worker exploitation is minimised wherever possible and remediated where identified.

1. ADDRESSING INEFFECTIVE LABOUR MARKET ENFORCEMENT

There is little protection, enforcement of statutory employment rights, or access to justice and remedy for vulnerable workers in the UK, leaving unscrupulous employers free to operate with minimal fear of detection.

The [Labour Market Enforcement Strategy 2018/19](#) highlighted that the average employer could expect a National Minimum/Living Wage enforcement inspection around once every 500 years, rising to once in 200 years in low-paid sectors such as accommodation and food services. The same report estimated that an employment agency could expect a visit from the EAS (Employment Agency Standards Inspectorate) every 20 years. The Low Pay Commission [May 2020 report](#) estimated over 420,000 workers not receiving their National Minimum Wage (NMW) entitlement in April 2019 with around 115,000 workers reported to be paid more than £1 per hour less than the National Living Wage (NLW) they were entitled to.

The Government has committed to a single enforcement body with consistent powers to address labour exploitation and modern slavery, enforce payment of NMW, NLW and holiday pay and safeguard agency workers. ALP submitted a [detailed response](#) to the [Good work plan: establishing a new single enforcement body for employment rights consultation](#) which closed in October 2019. The Government has yet to respond.

UK food supply chain labour provision is highly regulated and subject to licensing by the Gangmasters' and Labour Abuse Authority (GLAA). Non-compliance with statutory requirements can lead to significant enforcement action, up to and including criminal prosecution and removal of the ability to trade. The ALP has worked closely with the GLAA since its inception, fulfilling the role of 'critical friend' whilst representing responsible labour providers.

The ALP and its members support the purpose and objectives of the GLAA and particularly share the common goal to “maintain a credible licensing scheme, creating a level playing field and promoting growth”. Labour providers do not seek light touch regulation, they want proportionate regulation with a consistent and robust compliance approach to prevent worker exploitation. This is reflected in the results of the ALP’s biennial survey on perceptions of licence holders which consistently show overwhelming support for licensing and the work of the GLAA as follows:

	2017	2019	2021
Are in favour of gangmasters licensing	96%	95%	95%
Think the GLAA is doing a good job	86%	84%	79%
Believe the GLAA has created a more level playing field for competition	69%	66%	60%
Believe the GLAA has reduced fraud/illegal activity	80%	82%	77%
Think the GLAA has improved conditions for workers	88%	89%	82%
Agree that the service from the GLAA is professional	94%	97%	87%

However, fundamental issues exist within GLAA compliance operations. The ALP wrote to the former GLAA Chief Executive on 18th November 2019 and again on 18th March 2020 stating, “*The ALP remains deeply concerned regarding the GLAA’s current compliance operations for the reasons detailed extensively in our correspondence and how this is consequently negatively impacting upon the credibility of the licensing scheme. We acknowledge your positive response and willingness to work with the ALP to review and revise the GLAA’s approach to compliance.*”

The GLAA conducted a ‘Compliance strategy consultation’ between 18th December 2020 and 12th February 2021 seeking views on proposed changes to the way it inspects its licence holders. In its [submission](#) the ALP called on the GLAA to undertake a root and branch overhaul of its compliance operations and proposed 22 key actions for the GLAA to implement with urgency. Particular points to draw out include:

- The GLAA has not inspected 60% of licence holders within the last 5 years and 36% in the last 10 years.
- Conservatively, the existing GLAA resource should be able to undertake at least five times the current compliance activity.

This GLAA productivity challenge is reflected in an analysis of the cost of GLAA licensing:

GLAA Licensing - Value for Money	
Cost of Licensing (GLAA 2019/2020 accounts)	£2,183,000
Cost per Inspection	£2,474
Cost per non-compliance identified	£18,192
Cost per licence revocation	£87,320

The GLAA response to the consultation is expected to be agreed at the July 2021 Board Meeting.

ALP has a strong working relationship with the GLAA and will continue to offer our insight, help and challenge to support the GLAA to improve its operational processes, outcomes and impact.

2. ADDRESSING POOR PROCUREMENT PRACTICE

“Procurement teams should show evidence that they have factored in the true cost of labour into goods and services.”

Operation Fort Review, June 2020

At its root, labour exploitation is always about money.

Despite the passing of the Modern Slavery Act, responsible suppliers are still being forced to compete on price with those that have much lower standards. It is important that the companies that are genuinely driving improvement receive the commercial encouragement and recognition that they deserve, from both retail clients and consumers.

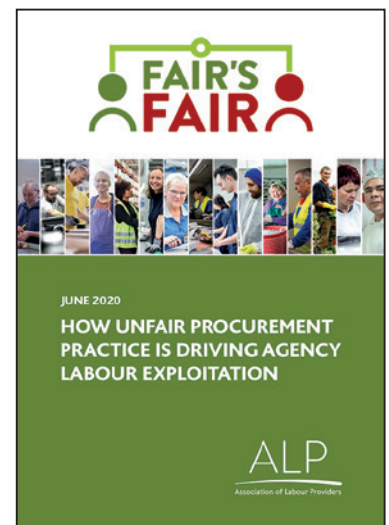
Operation Fort Review, June 2020

Accepting the lowest price for agency labour is often at the expense of workers as unscrupulous labour providers undercut compliant operators by evading their legal responsibilities. Labour users that pay unrealistically low rates are knowingly or recklessly conniving in illegality as such rates can only be achieved through worker exploitation, tax evasion or both.

Since 2007, ALP has defined the real cost of labour provision in its open source '[Charge Rate Guidance](#)'. The guidance, published annually for the last 15 years, enables labour providers to ensure that their charge rates cover all statutory costs of employment and labour provision and helps labour users to spot when rates offered are too good to be true. The tables within this document are used each year in the GLAA's corresponding [Charge Rate Guidance](#). Additional support available to ALP members includes detailed guidance on how to calculate charge rates for agency labour, an online charge rate calculator, webinars, training and consultancy.

In spring 2020, ALP conducted a member survey and found unfair procurement practice was widespread in the food supply chain, including:

- pricing that cannot sustain legally compliant pay rates
- poor procurement practices barred by the Groceries Supply Code of Practice
- no or minimal client due diligence.



8 in 10 labour providers report that they have come across examples of competitors where the charge rates are so low that they do not believe that labour can be provided ethically and compliantly.

ALP survey, 2020

To respond to these findings, ALP launched the **"Fair's Fair"** initiative: "An awareness and education programme to support the commercially sustainable procurement of agency labour so that workers never pay the price of poor purchasing practice."

Purchasing teams often see their primary function as being to drive down procurement costs and improve supplier terms. However, the cost of labour is always increasing – be this due to government minimum wage policy to reach 66% of median earnings, higher recruitment costs due to labour shortages or additional measures to address COVID-19 risks.

"Fair's Fair" offers a suite of open-source resources including:

- **'How unfair procurement practice is driving agency labour exploitation'** – launch report and webinar which defines the issues, includes the top ten poor procurement practices and the methods used by unscrupulous labour providers to undercut legitimate operators.
- **'Fair procurement of agency labour good practice toolkit'** – written in association with the Chartered Institute of Procurement and Supply, this comprehensive toolkit provides guidance, checklists and templates to support procurement professionals to make informed labour supply choices underpinned by effective purchasing standards.
- **'The RIPPPLine' (Report Illegal and Poor Procurement Practice)** – a confidential route for reporting businesses demanding unfair procurement practices – those offering or paying legally unattainable pay and charge rates for agency workers.



ALP has also developed the **Labour Supply Chain Payment Charter** - Signatories to this Charter agree to apply the fair payment commitments and to work collaboratively to promote compliance and human rights due diligence in their own arrangements and throughout UK supply chain. This includes KPI progress monitoring of labour provider adoption of modern slavery prevention, legal compliance and responsible recruitment practices.

3. SUPPORTING LABOUR PROVIDERS TO ADOPT GOOD LABOUR STANDARDS PRACTICE

Good practice includes providing more in-depth training for staff in operational roles. The next step is using training to create anti-slavery champions in different departments, enabling them to view business strategy through a modern slavery lens.

Operation Fort Review, June 2020

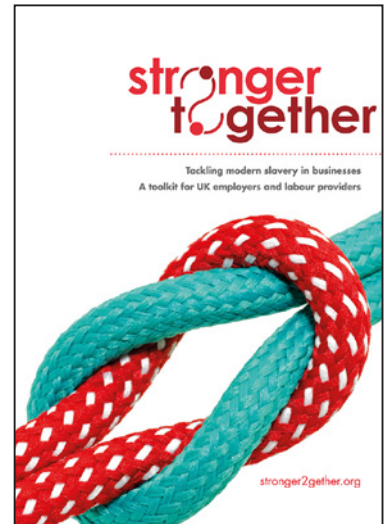
A. Support to address modern slavery risks

ALP is a key founding development partner of Stronger Together, launched in 2013 as a multi-stakeholder collaborative initiative supporting organisations in all sectors to address modern slavery risks within their business and supply chains. Stronger Together provides open source, practical, pragmatic and accessible guidance, tools and resources for use by any business, of any size.

The risk of infiltration by organised criminal gangs into temporary work agencies as seen in Operation Fort, and the due diligence measures to control this risk have been included within the Stronger Together materials since launch. However, the majority of growers and food producers don't require their labour providers to implement these due diligence steps or do not monitor that they have implemented them effectively.

Since Operation Fort, Stronger Together has undertaken a wholesale review of its service provision as follows:

- Reviewed and updated - [Tackling Modern Slavery in UK Businesses Toolkit](#) for businesses to deter, detect and deal with the risks of forced labour, labour trafficking and other hidden labour exploitation. Now running labour provider contextualised versions of this training workshop.
- Reviewed and updated - [Stronger Together](#) range of interactive workshops, e-learning and webinars to provide the practical skills to equip businesses to address modern slavery, forced labour, labour trafficking and other hidden third-party worker exploitation risks. Now extended to allow all supermarket supply chain businesses and GLAA licensed labour providers to receive one free delegate place per organisation every 3 years.
- Reviewed and updated - The '[Labour Provider/Recruitment Business Good Practice Implementation Checklist](#)' is an accessible interactive checklist which lists the steps labour providers should take to prevent third party hidden exploitation, and slavery in their operations and a self-assessed score against which to measure progress.
- New – [The UK Recruiters and Labour Providers Programme](#) is a collaboration with the key UK recruitment trade associations, ALP, APSCO (Association of Professional Staffing Companies), REC (Recruitment & Employment Confederation) and TEAM (The Employment Agencies Movement) dedicated to supporting recruitment businesses.
- Reviewed and updated – Businesses including labour providers may upload evidence to publicly demonstrate their commitment to tackling hidden labour exploitation and attain a [Stronger Together Business Partner recognition](#). Now extended to include Advanced and Verified Business Partner status for those with mature due diligence processes.
- New - [The Modern Slavery Champion Pack](#) includes everything businesses need to introduce advocates to raise awareness of modern slavery and hidden labour exploitation with workers and peers and promote how workers can report concerns or suspicions of modern slavery.
- New – [Labour Provider Verification Assessment](#) - an independent review by an expert consultant of the progress made in implementing good due diligence practice to prevent and respond to modern slavery and third-party hidden exploitation risks with recommendations and action plans.
- Reviewed and updated - The [Progress Reporting Tool \(PRT\)](#) is a pioneering online self-assessment tool, aligned with the UN Guiding Principles on Business and Human Rights, that supports companies globally to measure their progress made in their strategy to address modern slavery risks and to highlight the next steps for their businesses and supply chains. The [Organisational Progress Assessment](#) is an external expert verification of this which analyses gaps, reports business strengths and provides detailed recommendations and action plans to support organisational improvement.



The Stronger Together guidance, tools, training and team are ready to support labour providers in the UK food supply chain to understand and control the risks of modern slavery. There is more work for food producers, growers and supermarkets to do to drive this engagement:

GLAA licensed labour providers trading in the UK food supply chain – May 2021		
Registered on Stronger Together website	418	50%
Attended S2G Tackling Modern Slavery training in last 3 years	172	21%
Achieved S2G Business Partner Status	56	7%

B. Support to recruit responsibly

Leading practice for UK suppliers involves embedding all processes relating to ethical labour management into their site operations.

Operation Fort Review, June 2020



The ALP founded and funded the development of the [Responsible Recruitment Toolkit \(RRT\)](#) to drive ethical and professional recruitment and labour supply that's good for workers, recruiters and clients. RRT promotes responsible recruitment in supply chains by providing a toolkit of support to help businesses in all industries achieve and be recognised for responsible recruitment.

RRT's unparalleled flagship online tool enables business to build capacity in, and self-assess, responsible recruitment practices through:

- Access to step-by-step guidance comprehensively developed from, and mapped to, international ethical standards
- Specialist guidance contextualised to specific countries and sectors
- An extensive library of downloadable resources including template policies, checklists and management systems tools
- Self-assessment reporting functionality

Following Operation Fort, RRT has modified its [sponsorship model](#) so that all businesses in the global supply chains of its sponsors, and all ALP members, receive a free annual full subscription to the RRT online tool and free places on the RRT online training courses.

Sponsors demonstrate their leading commitment in this area and benefit from assurance of their supply chain, data on progress and cross-industry collaboration.

Subscribers to the RRT online tool can become an [RRT Business Partner](#) by uploading evidence to publicly demonstrate their commitment to responsible recruitment.

RRT provides [interactive online training courses](#) which bring responsible recruitment to life through case studies, activities and take-away actions. RRT sponsors' eligible suppliers and ALP members can book unlimited free places on the following RRT workshops:

- Introduction to Responsible Recruitment
- Safe Work for Agency/Contract Workers
- Eliminating Worker-Paid Recruitment Fees
- Fair and Equal Opportunity and Treatment
- Labour Supply Chain Due Diligence and Partnerships

The ALP also founded and funded the development of the globally pioneering [Clearview](#) certification scheme which enables labour providers to demonstrate to existing and potential clients that they operate responsibly, legally and ethically in their sourcing and supply

of workers. Clearview certification follows a management systems methodology to deliver a consistent global approach for the assurance and continuous improvement of responsible recruitment practice in supply chains.



Like the RRT Toolkit, the Clearview technical standards are mapped to existing and developing good practice including [IOM International Recruitment Integrity System \(IRIS\)](#) code of conduct, the [ILO Fair Recruitment](#)

Initiative, the Institute of Business and Human Rights **Dhaka Principles** and **Employer Pays Principle**, the **Global Social Compliance Code**, the WEC Code of Conduct, the **ETI Base Code**, **SMETA** and **BSCI** methodologies and the **UN Guiding Principles on Business and Human Rights**.

The RRT guidance, tools, training and team are ready to support labour providers in the UK food supply chain to embed responsible recruitment practices. There is more work for food producers, growers and supermarkets to do to drive this engagement:

GLAA licensed labour providers trading in the UK food supply chain – May 2021		
RRT subscribers	80	10%
Completed any RRT training in last 3 years	38	5%
RRT Business Partner	7	1%
Clearview registered	24	3%
Clearview certificated	0	0%

C. Support to engage with workers

Educating workers on their rights should be a priority and in good practice, companies are issuing information to migrant workers in their own languages.

Operation Fort Review, June 2020

ALP has funded and produced two free videos:

- **'Working in the UK'** - a video, in several languages, suitable for individuals with limited reading skills, to inform workers of their rights whilst working in the UK, signposting both to further guidance, and where to go for help.
- **'Working in the Food Industry'** - uses real food business footage and interviews with real workers to encourage job-seekers to view the UK food industry as a positive career choice.

Employers are encouraged to use both videos in their recruitment processes, induction training, social media and any other environment where they can reach workers.

There is no substitute for proactive daily engagement with workers on site.

Operation Fort Review, June 2020



Just Good Work is a free interactive mobile app, giving job-seekers and workers critical information and advice for everything needed on the journey to work, from recruitment, to employment and life in a new destination, to moving on or returning home.

ALP funded and **developed the UK content**, enabling this to be made freely available to all employers, labour providers and workers in the UK. Just Good Work helps businesses in all sectors throughout their own operations and supply chain to:

- Enable direct and indirect workers to access guidance on good recruitment and employment practices
- Provide relevant and consistent information to workers in a language they can understand
- Reduce the risk of worker exploitation and support Modern Slavery Act due diligence.

4. SUPPORTING FOOD PRODUCERS AND GROWERS TO APPLY EFFECTIVE DUE DILIGENCE

'Failing to take reasonable action to make sure that your supply of labour is legitimate can lead to significant legal, financial and reputational risks to your business. It could even stop your business from operating entirely.'

You may be liable for unpaid taxes and National Insurance contributions. You may be unable to recover VAT payments and you could be criminally prosecuted with an unlimited fine if someone acting on your behalf facilitates tax evasion.

Proper checks are also important for protecting workers and preventing modern slavery.'

HMRC Supply chain due diligence principles:

The Independent Anti-Slavery Commissioner's Operation Fort review found insufficient and ineffective due diligence. Labour providers placed too much trust in individual employees, carried out ineffective checks to detect anomalies and could have been more pro-active in checking worker welfare. Employers did not have enough safeguards in place for agency workers, could have better educated their workforce on spotting the signs of exploitation and didn't have clear protocols for reporting concerns.

ALP has responded by reviewing and updating all the guidance and support it provides to members so that labour providers have all they need to operate compliant businesses including:

- Over 100 live briefs, toolkits, template documents, webinar recordings and online tools on subjects as diverse as Health and Safety, Preventing Discrimination and Calculating Holiday Pay for Agency Workers
- A range of legally compliant template contracts
- Regular updates and communication through monthly forums, newsletters and labour supply updates, and weekly news updates
- Regular live webinars on matters of interest to labour providers and their clients, often with external representatives of government, NGO's or subject matter experts
- A helpline for direct one to one advice on individual matters

ALP has worked extensively with the Home Office and Defra to understand emerging immigration legislation and distil this into practical, straightforward and up to date [Immigration and Right to Work guidance](#) and resources. ALP partnered with the Home Office to produce the ['Workforce recruitment and labour supply from 2021'](#) guide which covers the new immigration rules, right to work checks, and how employers can develop strategies to source, recruit and retain workers within the new system.

ALP has totally overhauled its training offer under ['The ALP Academy'](#) to provide up to date, practical and cost-effective modular workshops, specifically tailored to labour providers and supply chains and designed and delivered by subject matter experts.



Leading practice involves extending training to the supply chain, to help build capacity and understanding in smaller and often less well-resourced companies.

Operation Fort Review, June 2020

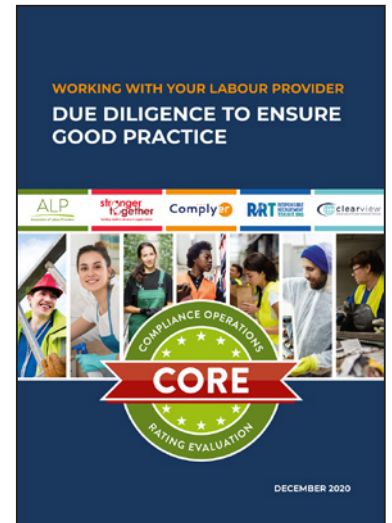
ALP Academy modules are completely flexible, can be delivered online and in-house, in any combination, and spread into bite-sized chunks over days or weeks. Subjects cover the full range of labour provider operations including: Preventing Illegal Working and Ensuring Effective Right to Work Policies; Paying Agency Workers Accurately and Fairly; Managing the Health and Safety of Agency Workers and Calculating Paid Holiday Entitlement for Agency Workers amongst many others.

The ALP Academy Foundation comprises four online programmes which together cover all the main legal and operational requirements for the effective provision of agency labour in the UK:

- Key legislation for labour providers
- Access to labour – recruiting and retaining agency workers
- Managing agency workers
- Client relationships

ALP has refined its free and open-source guidance '[Working with your Labour Provider – Due Diligence to ensure Good Practice](#)' to provide a step-by-step process to labour provider due diligence. This supports businesses to agree and monitor standards with their labour provider(s) that meet good practice and statutory requirements under all tax, health & safety and employment laws including the [Conduct Regulations](#), [Gangmasters Licensing Act](#), [Modern Slavery Act](#) and [Agency Workers Regulations](#).

To support this due diligence approach is the newly developed [Compliance Operations Rating Evaluation \(CORE Score\)](#) checklist. This is a free, accessible, sector neutral, interactive checklist which brings all legal compliance requirements together in a single document. It provides a self-assessed percentage score to enable gap analysis and action planning, signposts to key guidance and resources and supports collaborative working with clients.



Social auditing is usually too broad to discover incidences of modern slavery, and in many cases has not been designed to do so. But audits can be useful in raising labour standards.

Operation Fort Review, June 2020

Completely reviewed and updated in 2021, the [Complyer](#) software provides an intuitive labour provider compliance audit tool to assess and monitor compliance against key UK statutory requirements. Complyer includes an explanation of what is required against each standard, with supporting guidance, and a range of automatic reports simplifying the follow up process. Complyer can be used either as a self-audit tool, by labour providers and/or their clients, or as an independent and confidential assessment of labour provider legal compliance. Its modest cost means all businesses are able to successfully navigate the complexities of labour provider auditing, producing accurate results and detailed corrective action reports without engaging experts.



All our programmes offer expert bespoke consultancy for those who want to support their compliance and due diligence journey with direct assistance. Each expert consultant has years of senior level experience as either a labour provider, a labour user or a subject matter expert and is fully conversant and up to date with relevant legislative and ethical standards.

The ALP is ready to support the labour providers in the UK food supply chain to embed compliant practices. There is more work for food producers, growers and supermarkets to do to drive this engagement:

GLAA licensed labour providers trading in the UK food supply chain		
ALP members	336	41%
ALP - Attended ALP compliance training in last 3 years	45	5%
ALP - Approved 3rd party compliance audit in last 3 years	9	1%

5. NEXT STEPS – DRIVING COMPLIANCE ENGAGEMENT AND HUMAN RIGHTS DUE DILIGENCE IN THE SUPPLY CHAIN

The structural and economic risks which create the conditions for modern slavery and hidden exploitation in the UK are now heightened. This is identified in the joint report '[The Impact of the New Immigration System on Human Trafficking into the UK](#)' which highlights the cessation of a general immigration route for low skilled workers with an ongoing demand for such workers in high risk sectors; uncontrolled entry and exit of EU nationals; the heightened risk of debt bondage created through the points-based system, and the absence of employment protection rights for undocumented workers, all of which enable traffickers to more easily exploit and control their victims.

The preparatory and underpinning work to support labour providers to adopt compliant labour standards and responsible recruitment practice with effective due diligence and the monitoring thereof has now largely been completed. Whilst there will always be continuous improvement, the focus of ALP's activity has now shifted to driving greater compliance engagement amongst a larger cohort of GLAA licensed labour providers. Activities currently planned include:

A. Engagement with the supermarkets and their supply chains

The ALP will write again to the supermarket Chief Executives, this time calling upon their organisations to make three commitments:

- **'Labour Supply Chain Payment Charter'** – to sign the Charter and agree to apply a set of fair payment commitments and to work collaboratively to promote compliance and human rights due diligence in its own arrangements and throughout its UK supply chain.
- **'Labour Provider Compliance – Due Diligence to ensure Good Practice training'** – to require all labour users and labour providers in their UK supply chain, by July 2022, to attend a free interactive two-hour practical training workshop, which includes step by step guidance, signposting to appropriate resources and an action plan to take away.
- **'Labour Provider Compliance Maturity Framework'** – to require all the labour providers in their UK supply chain to achieve Level 3 by the end of 2022.

B. Engagement with the GLAA and food supply chain

The ALP, GLAA and British Retail Consortium are collaborating to develop a new Food Supply Chain Protocol in partnership with the wider food industry. This is in an early consultation stage and seeks to take a new approach to collaborative working in the UK food supply chain with regards to protecting vulnerable workers by creating and acting as an enabling structure to:

- Educate workers on their rights and remedies and prevent labour exploitation
- Support food supply chain businesses to better apply human rights due diligence processes through:
 - enabling the production and sharing of good practice within the food supply chain
 - establishing maturity frameworks, building on the existing work of the IASC and ALP
 - supporting activities to be reported in Transparency in Supply Chain Statements
- Enable intelligence sharing to prevent and remedy the exploitation of workers

C. Partnership working with the GLAA

ALP has formally proposed to the GLAA a collaboration to support the GLAA's purpose to "Work in partnership to protect vulnerable and exploited workers". These would be at no cost to the GLAA or licence holders, positively support adherence with the licensing standards and support the GLAA's strategic objectives:

1. Collaboration to promote the 'CORE Score' (Compliance Operations Rating Evaluation) checklist as a compliance self-assessment tool for labour providers.

2. Collaboration to promote the free place for all licence holders and applicants on the 2-hour online workshop: 'Labour Provider Compliance – Due Diligence to ensure Good Practice'. A practical workshop designed and delivered by the ALP, which includes step by step guidance, signposting to appropriate resources and an action plan to take away.
3. Collaboration to promote the free place for all licence holders on the Stronger Together 'Tackling Modern Slavery in UK Businesses' workshop to equip business with the skills and knowledge to address the risks of modern slavery and other hidden third-party exploitation. This is supported by the Stronger Together Labour Provider Good Practice Implementation Checklist.

D. Adopting the 'Labour Provider Compliance Maturity Framework'

We wanted to create an assessment tool that helped business gauge improvement rather than just comply with the legal requirement to have a modern slavery statement. The maturity framework sets out the activities of businesses – from those that are barely compliant to those that are leading in human rights innovation and ethical performance.

Operation Fort Review, June 2020

Mirroring the terminology used by the Independent Anti-Slavery Commissioner, the ALP has developed a Labour Provider Compliance Maturity Framework for those trading in the GLAA licensed sector. This categorises businesses according to their level of engagement with the programmes that support compliance good practice, responsible recruitment and human rights due diligence. These programmes are structured so that ALP members pay no additional costs until they seek to achieve Maturity Level 4.

Baseline scores as of May 2021 are contained in the table below.

Trading GLAA Licensed Labour Provider Compliance Maturity Framework	Number	%	Definition
Level 0 - No engagement	380	46%	Not ALP member or registered with RRT or S2G
Level 1 - Receiving Information	445	54%	Any of: ALP member, S2G or RRT registered but not attended ALP compliance, S2G and RRT training in last 3 years
Level 2 - Building Capability	4	0%	Level 1 plus has attended ALP, S2G and RRT training in last 3 years
Level 3 - Self Reporting			Level 2 plus sharing CORE; RRT and self-assessment with clients and is an S2G & RRT Business Partner
Level 4 - Externally verified			Level 3 plus satisfactorily Complyer audited and S2G Verified; or Clearview certified

ALP will record, monitor and report progress against the Maturity Framework on a monthly basis. Over time, we expect this framework to correlate to improvements in UK labour supply as more and more businesses engage with the support and resources that these programmes offer.

The Maturity Framework engagement levels above show that there is much progress still to be made and the most effective impact on this will be achieved through supermarkets, retailers, food producers and growers mandating human rights due diligence by the labour providers in their supply chain.

Please do not hesitate to contact ALP to find out more.