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The Gangmasters & Labour Abuse Authority and Precarious Workers In The UK

Caroline Hewitt

A thesis submitted in partial fulfilment of the requirements of
Sheffield Hallam University
for the degree of Doctor of Philosophy

August 2025

CANDIDATE DECLARATION

I hereby declare that:

1. I have not been enrolled for another award of the University, or other academic or professional organisation, whilst undertaking my research degree.

2. None of the material contained in the thesis has been used in any other submission for an academic award.

3. I certify that this thesis is my own work. The use of all published or other sources of material consulted have been properly and fully acknowledged.

4. The work undertaken towards the thesis has been conducted in accordance with the SHU Principles of Integrity in Research and the SHU Research Ethics Policy, and ethics approval has been granted for all research studies in the thesis.

5. The word count of the thesis is 76,877

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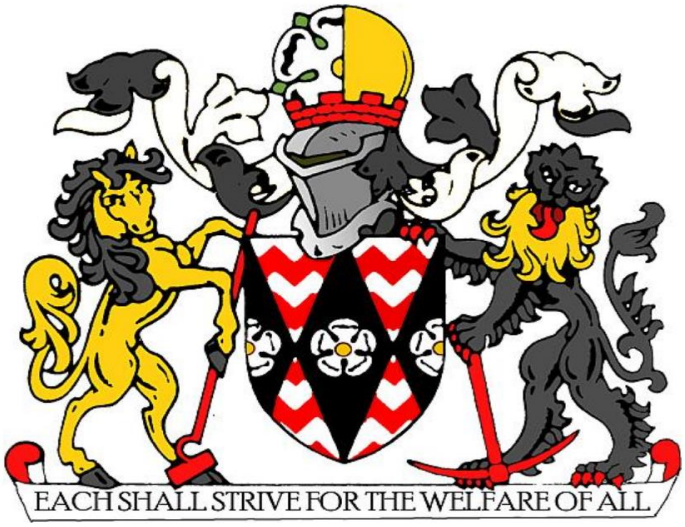
ABSTRACT

This contemporary study critically explores the Gangmasters and Labour Abuse Authority (GLAA) and the regulatory environment of GLAA workers in the concept of the 'Precariat' (Standing, 2011). This is important because there is a lack of understanding of how some groups of workers have been formed, how they migrate, and why licensed gangmaster businesses are incorporated incorrectly within Office for National Statistics (ONS) data.

Using an objective stance and a critical realist research philosophy with a concurrent mixed methods case study, this thesis draws from qualitative and quantitative data collection techniques with archival research, before the analysis of semi-structured interviews and a group interview with stakeholders who have a vested interest in the GLAA, archival data, and questionnaires of the precariat in the food manufacturing and food processing sectors.

Findings are significant and reveal that equal treatment of the precariat is not applied as a non-unionised flexible workforce is expanded, providing contrived high employment figures at the ONS, as the statutory and functional role of the Home Office led GLAA fails to regulate licensed gangmasters in their remit. An unacknowledged but implicit structural tendency with the Home Office, drives the expansion of an army of flexible labour via open borders, by exploiting the 1973 Employment Agencies Act via gangmaster paymaster Contract for Service and Managed Service Provider/Programme Models within a Centralised Labour Control System.

The Discussion and Conclusions provide independent and original revelatory Contributions to Knowledge. The precariat are located as an army of 10 million assembled at the ONS propping up the Financial Services Sector, with licensed gangmasters notedly exempt from HMRC investigations. As the precariat, citizens and the UK economy suffer in a Cost of Living crisis, Critical Realism bridged the gap between government, treasury, finance, agriculture, horticulture, food manufacturing, food processing and economic and social policies.



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Charlotte, Roslyn, Anne, Paula, Janet, Colette

"A nation that neglects its workers neglects its future"
Lord Ernest Bevin

"That this House takes note of Command Paper No. 6527 on Employment Policy and welcomes the declaration of His Majesty's Government accepting as one of their primary aims and responsibilities the maintenance of a high and stable level of employment after the war" (HC Deb., 21 June 1944)

The Right Honourable Ernest Bevin, Minister of Labour and National Service
Prime Minister Winston Churchills Wartime Coalition Government

Foreign Secretary Ernest Bevin, creator of NATO
Prime Minister Clement Richard Attlee's Labour Government

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ABBREVIATIONS

aGVA	approximate Gross Value Added
AI	Artificial Intelligence
ALP	Association of Labour Providers
AMT	Arm Mounted Terminal(s)
AMW	Agriculture Minimum Wage
AWB	Agriculture Wages Board
AWD	EU Temporary Agency Work Directive 2008/104/EC
AWR	The Agency Workers Regulations 2010
BEIS	Department for Business, Energy & Industrial Strategy
BERR	Business, Enterprise, and Regulatory Reform
BFB	Brexit Freedoms Bill
BIS	Department for Business, Innovation & Skills
BRC	British Retail Consortium
BRES	Business Register and Employment Survey(s)
BTOM	Border Target Operating Model(s)
CAQDAS	Computer Assisted Qualitative Data Analysis Software
CDA	Critical Discourse Analysis
CE	Chief Executive
CEST	Check Employment Status Tool
CFS	Contract for Service(s)
CFS/ZHCM	Contract for Service/Zero Hour Contract Model(s)
CIPD	Chartered Institute of Personnel and Development
CLCS	Centralised Labour Control System
CoE	Contract of Employment(s)
CPTPP	Comprehensive and Progressive Agreement for Trans-Pacific Partnership
CRG	Charge Rate Guidance
CSO	RoI Central Statistics Office
CTA	Common Travel Area
DBS	Disclosure and Barring Service
DEFRA	Department for Environment Food & Rural Affairs
DLME	Director of Labour Market Enforcement
DTI	Department of Trade and Industry
DWP	Department for Work & Pensions
EAA1973	Employment Agencies Act 1973 Chapter 35
EASI	Employment Agency Standards Inspectorate
EHRC	Equality and Human Rights Commission
ERA1996	Employment Rights Act 1996 Chapter 18
ET	Employment Tribunal(s)
EU	European Union
FATS	Foreign Affiliates Statistics
FMC	Food Manufacturing Client(s)
FoI	Freedom of Information
GATT	General Agreement on Tariffs and Trade 1994
GB	Great Britain
GDMR	Gangmaster Dominated Migration Regime
GDP	Gross Domestic Product
GLA	Gangmasters Licensing Authority
GLAA	Gangmasters & Labour Abuse Authority
GMB	General Municipal Boilermakers Union/General Union

H&S	Health and Safety
HCW	Hand Car Wash(s)
HID	Hidden Incomplete Data
HMICFRS	Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services
HMRC	His/Her Majesty's Revenue & Customs
HMT	HM Treasury
HO	Home Office
HR	Human Resource(s)
HSE	Health and Safety Executive
IASC	Independent Ant-Slavery Commissioner
IDBR	Inter-Departmental Business Register
ILO	International Labour Organization
IMF	International Monetary Fund
IR	Industrial Relations
KPI	Key Performance Indicator(s)
KPMG	Klynveld Peat Marwick Goerdeler
LAPO	Labour Abuse Prevention Officer(s)
LEP	Local Enterprise Partner/Partnership(s)
LFS	Labour Force Survey(s)
LMEO	Labour Market Enforcement Order(s)
LMEU	Labour Market Enforcement Undertaking(s)
LP	Labour Provider(s)
LPC	Low Pay Commission
MAC	Migration Advisory Committee
MSPM	Managed Service Provider/Programme Model(s)
NCA	National Crime Agency
NDPB	Non-Departmental Public Body
NEA	New Enterprise Allowance scheme
NEST	National Employment Savings Trust
NFU	National Farmers Union
NGHC	Not Guaranteed Hour Contract(s)
NHS	National Health Service
NI	Northern Ireland
NIC	National Insurance Contribution(s)
NIP	Northern Ireland Protocol
NISRA	Northern Ireland Statistics and Research Agency
NRPF	No Recourse to Public Funds
NLW	National Living Wage
NMW	National Minimum Wage
NRM	National Referral Mechanism
OBR	Office for Budget Responsibility
OECD	Organisation for Economic Co-operation and Development
ONS	Office for National Statistics
OTS	Office of Tax Simplification
p.d.	per day
p.h.	per hour
p.w.	per week
PACE	Police and Criminal Evidence Act 1984
PAE	Pension Auto-Enrolment
PAYE	Pay As You Earn
PhD	Doctor of Philosophy

PSNI	Police Service Northern Ireland
RAPID	Registration and Population Interaction Database
RCWS	Responsible Car Wash Scheme
REC	Recruitment & Employment Confederation
REUL	Retained EU Law (Revocation and Reform) Bill
RISR	Recruitment Industry Status Report
RLAB	Professor of Practice at The Rights Lab at the University of Nottingham
RLW	Real Living Wage
RO	Research Objective(s)
RoI	Republic of Ireland
RQ	Research Question(s)
RTI	Real Time Information
RU	Reporting Unit(s)
SAWS	Seasonal Agriculture Workers Scheme
SBS	Sectors Based Scheme
SEB	Single Enforcement Body
SHU	Sheffield Hallam University
SIC	Standard Industrial Classification
SLA	Service Level Agreement(s)
SOC	Standard Occupational Classification
SSP	Statutory Sick Pay
STPO	Slavery and Trafficking Prevent Order(s)
STRO	Slavery and Trafficking Risk Order(s)
SWVR	Seasonal Worker Visa Route
TCA	Trade and Cooperation Agreement between the European Union and the European Atomic Energy Community, of the one part, and the United Kingdom of Great Britain and Northern Ireland
TFEU	Article 45 of the Treaty on the Functioning of the European Union
TFP	Total Factor Productivity
TIAH	The Institute for Agriculture and Horticulture
TLFS	Transformed Labour Force Survey
TUC	Trades Union Congress
TUPE	The Transfer of Undertakings (Protection of Employment) Regulations 2006
TWA	Temporary Work Agency
UK	United Kingdom(s)
UKBA	United Kingdom Border Agency
UKNA	United Kingdom National Archives
UN	United Nations
URL	Uniform Resource Locator(s)
USDAW	Union of Shop, Distributive and Allied Workers
U.S.	United States
VAI	Virtual Application Inspection(s)
VAT	Value Added Tax
WEC	World Employment Confederation
WTD	Working Time Directive
WTR1998	The Working Time Regulations 1998
WTO	World Trade Organisation
ZHC	Zero Hour Contract(s)

THE GANGMASTERS & LABOUR ABUSE AUTHORITY AND PRECARIOUS WORKERS IN THE UK

CHAPTER 1: Introduction

This research was mediated by the researcher's understandings and experiences of the licensed gangmaster sectors. The research was prompted by the licensed gangmasters use of the Contract for Service (CFS) and The Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE) to replace United Kingdom (UK) workers in Derbyshire with Gangmaster and Labour Abuse Authority (GLAA) registered migrant workers, which thus left local UK workers without work, increased GLAA worker numbers in the food manufacturing and food processing sectors, which thus increased employee numbers at the Office for National Statistics (ONS).

Prime Minister Margaret Thatcher introduced free market liberalism into the UK which has acted as a guide (Harvey, 2005) for the construction of neoliberalism with deregulatory approaches to running an economy. One doctrine of neoliberalism includes the Centralised Labour Control System (CLCS) whereby "central versus local cannot therefore be automatically read" (Crouch, 2011, p. 23) that promotes the application of the Employment Agencies Act 1973 Chapter 35 (EAA1973). The researcher has uncovered real models including the gangmaster paymaster Contract for Service/Zero Hour Contract Model (CFS/ZHCM) displayed and illustrated realistically as Figure 2.3 (p. 59) that forms part of the GLAA licensed gangmaster paymaster Managed Services Provider/Programme Model (GLAA/MSPM) illustrated realistically in Chapter 4 as Figure 4.2 (p. 158).

Nonetheless, this critically realist research contribution exemplifies the implications of these models by shining a light on the models operating in the CLCS, headlined by the unobserved EAA1973. Neoliberalism has economically failed UK citizens with labour market deregulation and gangmaster capitalist activity supported by open border policies that have enabled gangmasters to create a "reserve army of labour" (BBC, 1992, June 22), that in turn have crushed growth and productivity contributing to rising debt, inequality, poverty and a Cost of Living crisis.

Although neoliberalism seeks to shrink the UK welfare state, as far as total worked hours are concerned, the state does not reduce in size because employees are simply reconstructed as workers that are absorbed in goods including pet food for services to financially benefit the few. There has never been a free market or free trade in the UK as

doctrines of neoliberalism (Gamble, 2001) including labour market deregulation and open border policies are emblematic of the Employment Agency Standards Inspectorate (EASI), His/Her Majesty's Revenue and Customs (HMRC) National Minimum Wage (NMW) team and the Home Office (HO) led GLAA, that in turn provides a platform for the expansion of licensed gangmasters to generate liberalised capital from precarity in goods for services, but absorbed as Hidden Incomplete Data (HID) in the Financial Services Sector, at best described as follows.

With the number of gangmasters rising and following the Morecambe Bay cockle-picking disaster on the 5th of February 2004 when undocumented immigrants from China drowned (GLAA, 2009, February 3), a Labour led government introduced the Gangmasters (Licensing) Act 2004 to establish the Gangmasters Licensing Authority (GLA) to protect workers from exploitation in the UK (Smith, 2004).

As part of the Immigration Act 2016, the GLA became the Gangmasters and Labour Abuse Authority (GLAA) to work in partnership to prevent, detect and investigate worker exploitation across the UK. The GLAA is a regulatory body with clear responsibility to protect vulnerable workers and has the power to investigate registered workers defined by Standing (2011) as the 'Precariat'. The GLAA incorporates the Modern Slavery Act 2015 (The National Archives, 2023a) expanding their influence and power, generating public trust in the GLAA, Director of Labour Market Enforcement (DLME), Independent Anti-Slavery Commissioner (IASC), stakeholders and industry. The GLAA works with partners but has a clear investigatory role to monitor licensed gangmasters, with the ability to remove licenses from approved gangmasters. There is limited engagement between the state and state agencies who should ensure compliance of weaknesses in supply chains and enforce underpayments of wages (Lucio and MacKenzie, 2017).

Labour Abuse Prevention Officers (LAPOs) have a statutory role under the Immigration Act 2016 (s. 12) and the Police and Criminal Evidence Act 1984 (s. 114(B)) to investigate allegations of modern slavery and labour market offences of the underpayment of the NMW or National Living Wage (NLW). However, in 2016 LAPOs could not issue notices of underpayment of the NMW or NLW and had their ability to apply and vary prohibition orders to gangmasters and workers on a CFS in GLAA sectors via changes to the EAA1973, just two months following their implementation in the Immigration Act 2016 which received Royal Assent just one month before Brexit on the 23rd of June 2016. Further clarification of deregulated LAPOs is provided by the Department for Business,

Energy, and Industrial Strategy (BEIS) Secretary of State for the GLAA (Home Office/GLAA, 2018, August). It is therefore timely to explore which circumstances including the inadequate absorption and changing of legislation have enabled the licensed gangmaster sector to expand an estimated 720,000 migrants in 2010 (Tuckman, 2010) by exploiting the free movement of the 'Precariat' (Standing, 2011) from the Republic of Ireland (RoI), through Northern Ireland (NI) into Great Britain (GB). A new dimension of dominant political discourse has taken shape as rebranded licensed gangmaster sectors are incorporated within ONS services data including financial and insurance activities data where workers as so-called employees are located, enabling the licensed gangmaster sector to self-regulate their services in all sectors including the food manufacturing, food processing and seasonal agriculture and horticulture sectors explored in this research.

1.1 Research Aim

Standing (2011) describes the working class as the 'Proletariat' who are people who sell their labour to live. The Proletariat work in welfare states with welfare and wage benefits, stable employment and state rights and freedoms. Below the Proletariat are the 'Precariat' (Standing, 2011) who also sell their labour to live as illustrated in Table 1.1. Described as a new social class in the making, the precariat move between insecure unstable jobs, with flexible contracts in temporary jobs with agencies, they have no secure occupational identity, wages without benefits and they lack employment rights and freedom.

This contemporary study aims to critically explore the GLAA, and the regulatory environment of workers defined by Standing (2011) as the 'Precariat'. This research will investigate the working mechanisms and complexities surrounding workers [GLAAC3] in Table 1.1, the expansion of the 'precariat' (Standing, 2011), and how they are economically disadvantaged and exploited, looking to leaders for help and support with social protection interventions that were promised, but never materialised.

Categorisation of Peripheral Workers in the remit of the GLAA	
Code of Group of Workers	Descriptor
[GLAAC1]	Workers via Human Trafficking
[GLAAC2] Unlicensed Workariat: The Fourth Group of the Precariat (Standing, 2011)	Workers via Unlicensed Gangmasters, and possibly Licensed Gangmasters Employment Status: (GLA, 2010, April 21a; GOV.UK, 2021, May 4) Agency workers: UK, EU, International Workers and Students, Skilled and Unskilled Home Workers, and EU Migrants. Agency workers known as: Contingent labour Contractors Non-salaried Blue collar workers Frontier worker Non-exempt/Non-typical Service sector workers Cross border worker Unlicensed workers Worker with civil/special status Associates Unlicensed persons Migrants/Operatives Low-skilled/migrant Earners or Employees Precarious workers on demand Irregular hours worker Unregulated/Flexible Welfare claimants Co-workers Documented Seasonal farm worker Union citizen Informalised/Marginalised Guestworker Registered Migratory agricultural worker Irregular or casual worker Mobile worker The 'Precariat' (Standing, 2011) On-call worker Workers on a CFS within a MSP Model Essential worker GLAA workers on a CFS which is a ZHC Limb (b) worker Workers on a Contract for Service (CFS) which is a Zero Hour Contract (ZHC) Workers on ZHC, casual agreements or directly employed For society to function, unlicensed workers in the concept of the Unlicensed Workariat have key worker status in a pandemic.
[GLAAC3] Licensed Workariat: The Fifth Group of the Precariat (Standing, 2011)	Workers via GLAA Licensed Gangmasters Employment Status: (GLA, 2010, April 21a; GOV.UK, 2021, May 4) Agency workers: UK, EU, International Workers and Students, Skilled and Unskilled Home Workers, and EU Migrants. Agency workers known as: Contingent labour Contractors Non-salaried Blue collar workers Frontier worker Non-exempt/Non-typical Service sector workers Cross border worker Licensed workers Worker with civil/special status Associates Licensed persons Migrants/Operatives Low-skilled/migrant Earners or Employees Precarious workers on demand Irregular hours worker Unregulated/Flexible Welfare claimants Co-workers Documented Seasonal farm worker Union citizen Informalised/Marginalised Guestworker Registered Migratory agricultural worker Irregular or casual worker Mobile worker The 'Precariat' (Standing, 2011) On-call worker Workers on a CFS within a MSP Model Essential worker GLAA workers on a CFS which is a ZHC Limb (b) worker Workers on a Contract for Service (CFS) which is a Zero Hour Contract (ZHC) Workers on ZHC, casual agreements or directly employed For society to function, GLAA workers in the concept of the Licensed Workariat have key worker status in a pandemic.
[GLAAC4] Unlicensed Workariat and Licensed	Workers [GLAAC2] [GLAAC3] and [GLAAC4] via GLAA Licensed Gangmasters, that also act as Unlicensed Gangmasters, and their Skills and Training Providers also known as Operators, and Learning Enterprise Partners (LEP), Service Sector Providers, Enterprise Companies, Apprenticeship Training Providers, Group Training Associations and Facilities Companies

Workariat: The Sixth Group of the Precariat (Standing, 2011)	Employment Status: (GLA, 2010, April 21a; GOV.UK, 2021, May 4) Associated Self-employed Workers: UK, EU, International Workers and Students, Skilled and Unskilled Home Workers, and EU Migrants. Agency workers known as: Temporary self-employed workers Off-payroll worker (IR35) Non-salaried worker/employee Non-exempt Informalised/Generalised On-call worker Essential worker Contingent labour Blue collar workers Frontier worker Independent Contractors Service sector workers Cross border worker Migrants/Operatives Associates Documented Irregular or casual worker Migratory agricultural worker Registered Mobile/Flexible Low-skilled/migrant Guestworker Earners or Employees Precarious workers on demand Irregular hours worker Unregulated/Non-typical Welfare claimants Co-workers Union citizen Worker with civil/special status Seasonal farm worker Limb (b) worker Licensed/unlicensed workers/persons The 'Precariat' (Standing, 2011) Part Time Gig workers Full Time Gig workers Food Take-away Couriers Zero Hour Contractors or directly employed Workers could be on a Contract to Work Workers could be on a CFS which is a ZHC Workers could be on a CFS within a MSP Model Dependent self-employed worker GLAA workers on a CFS which is a ZHC For society to function, the Unlicensed and Licensed Workariat have key worker status in a pandemic.

Table 1.1: Categorisation of Peripheral Workers in the remit of the GLAA

The GLA was an executive Non-Department Public Body (NDPB), an organisation tasked with investigating labour exploitation in the UK. Formed after the Morecambe Bay cockle-picking disaster when undocumented immigrants from China drowned, the GLA was initially guided by the Department for Environment Food and Rural Affairs (DEFRA) until its transition to Home Office Governance in 2014 (Home Office/GLAA, 2018, August, p. 5).

The precariat (Standing, 2011) are not employed by their licensed gangmaster, their CFS does not guarantee hours or work, and they do not have access to basic human rights including the freedom of choice and protection from harm as set out in The Human Rights Act 1998. The GLAA appear to give the impression that these tenets protect workers in their remit, but changes to the Gangmasters (Licensing) Act 2004 enabled the exclusion of licensed gangmasters from responsibilities in the EAA1973, and prevented GLAA

LAPOs from issuing “Notices of underpayment under the National Minimum Wage Act 1998” or to apply for prohibition orders which could prohibit gangmasters from engaging in their activities via changes to the EAA1973 (s. 9) which includes offences under s.13 following the implementation of the Immigration Act 2016 (s. 19).

1.2 Research Objectives and Research Questions

1.2.1 Research Objectives

The first research objective will investigate the GLAA history, statutory and functional role to regulate labour to the service sectors within its remit in the UK. Secondly, the researcher will critically explore the GLAA governance, evaluating its contribution and role to protect workers in the UK which includes the exploration of GLAA board members, stakeholders and their roles which are regulated by law. The researcher has chosen to classify workers into groups i.e., Workers via Human Trafficking in Group 1 known as [GLAAC1], Workers via Unlicensed Gangmasters in Group 2 known as [GLAAC2], Workers via Licensed Gangmasters in Group 3 known as [GLAAC3] and Workers via Licensed Gangmasters and their Skills and Training Providers in Group 4 known as [GLAAC4], with all illustrated and categorised in Table 1.1. This is followed by an examination of data and collection techniques at the ONS that will establish if the precariat (Standing, 2011) on a CFS are provided with a full range of coverage in their data which is essential for government, treasury, finance, economic and social policy making. This objective will be reviewed in terms of food manufacturing and food processing by examining ONS Employment and Services sector data which is useful for the food manufacturing and processing sectors. This review will identify neoliberalism, political discourse and businesses within businesses within services that distort the services sector for profitability. The lack of engagement and links between food manufacturing and private gangmaster sectors via Pay As You Earn (PAYE) will be identified, alongside direction provided from the Service sectors to the ONS, the Recruitment and Employment Confederation (REC) and Klynveld Peat Marwick Goerdeler (KPMG) with the Purchasing Managers Index by S&P Global to the House of Commons, and the ONS to the International Monetary Fund (IMF), Organisation for Economic Co-operation and Development (OECD), United Nations (UN) and World Bank. GLAA sectors including food manufacturing and food processing and the precariat distort Financial Services data that is distributed in the UK and globally.

1.2.2 Research Questions

The Research Objectives (ROs) will be supported by responding to Research Questions (RQs) regarding the GLAA and its operations in the food manufacturing, food processing and other service sectors. Table 1.1 provides a comprehensive list of academic terms used to describe the 'Precariat' (Standing, 2011) in the food manufacturing and processing sectors that are categorised as peripheral workers in the remit of the GLAA. Not all these workers will be explored. The researcher's study will be confined to specific groups of the precariat known as agency workers [GLAAC3], contingent labour, registered workers, contractors, seasonal workers, operatives to name but a few, working from a CFS which is a Zero Hour Contract (ZHC) with legislation applied like the Agency Workers Regulations 2010 (AWR). This research will provide a focus on the precariat [GLAAC3] in the food manufacturing and food processing sectors in the GLAA remit.

The precariat in the coded group of workers [GLAAC3] in Table 1.1 in the food manufacturing and food processing sectors will be the focus of this research. They will be examined in their contexts to inform an understanding of their lived experiences and how the levels of protection advertised may not be met by their licensed gangmasters, proposing three Research Questions:

1.2.2.1 RQ 1. How has the historical, statutory, and functional role of the GLAA developed to regulate the sectors in its remit?

This research will complement the problems associated with the compliance and regulation work of Mustchin and Lucio (2020), Mackenzie and Lucio (2019), deregulation as informalization (Clark, Hunter, Pickford and Fearnall-Williams, 2022; Lucio and Mackenzie, 2017) with the informalized Hand Car Wash sector (HCW) of Clark et al. (2022) and research based on the enforcement of employment rights by EU-8 migrants and Employment Tribunals (ETs) (Barnard and Butlin, 2020a; Barnard and Butlin, 2020b; Barnard and Ludlow, 2016). Barnard, Ludlow and Butlin (2018) write from a legal perspective about laws to protect the precariat (Standing, 2011). To help with this, Figure 1.1 (p. 16) provides an illustration of some World Trade Organisation (WTO) and European Union (EU) laws and legislation and their application in UK law from 1994 - 2023.

The GLAA is a large, regulated area, it is therefore vitally important for research, policy makers and law enforcement to recognise the precariat have employee status without employee benefits (PQ magazine, 2021, June) in the remit of the GLAA and to avoid

confusion, recognise the GLA (now GLAA) as an actor in the industrial relations (IR) system (Heery and Frege, 2006) that makes employment and enforcement decisions (Gooberman, Hauptmeier and Heery, 2017). From the researcher's critical perspective, the GLAA is not actually regulating and despite its rhetoric it is not realistic as it seeks to look professional and competent by regulating a flexible economy. Workers' rights are protected in the UK, and they should receive Statutory Sick Pay (SSP) and Health and Safety (H&S) protections. However, at the same time, the precariat in the GLAA remit have no voice and no knowledge of the system (Fitzgerald and Smoczynski, 2021) as they receive low wages with an itemised payslip with deductions and payments, with many having no recourse to public funds (NRPF) for example Universal Credit to help with living costs (GOV.UK, 2025, January 14; Standing, 2011).

The researcher's approach will explore the historical, statutory and functional role of the GLAA with potential avenues for engagement and regulation between regulators, government bodies, stakeholders, and the precariat as GLAA responsibilities, and if licensing protects the vulnerable and exploited precariat, by introducing a further Research Question:

1.2.2.2 RQ 2. Has the governance of the GLAA been effective in protecting the precariat in food manufacturing?

The rationale for this question is such that, the GLAA provides licensing for Labour Providers (LPs) and the precariat. The GLAA then place the precariat into a flexible workforce and protect LPs by applying the Regulators' Code Principles (GLAA, 2018, September 13).

GLAA governance will be explored including the adoption of WTO and EU Directives illustrated in Figure 1.1, for example The EU Temporary Agency Work Directive 2008/104/EC (AWD) implemented to create minimum standards for agency workers and to prevent exploitation by employers. The AWD was implemented in the UK as The Agency Workers Regulations 2010 (AWR) (Forde and Slater, 2016; Wynn, 2014) which entered into force on the 1st of October 2011. Following its implementation, some management may have switched some full time and part time employees and agency workers to replace them with mainly undocumented migrants (Sporton, 2013). The AWR are significant because LAPOs and the GLAA do not have responsibility to enforce the AWR, therefore enabling licensed gangmasters and food manufacturing and processing companies to adopt their own business models, whereby owners would capture value

from economic and social contexts as financialisation (Clark, 2016) in the domestic economy. Epstein (2005) talks about income from holders of financial actors which provides an argument for internalised commodities as the financial instrument within financial gangmaster channels providing "income to holders of financial assets" (Epstein, 2005, p. 4) in the UK and globally, as GLAA governorship includes pay rates for the precariat illustrated in Table 1.1.

The researcher's motivation to carry out this research aims to explore the governance of the GLAA to provide a 'real' explanation of the objectives and examines the aims of the government to rebrand gangmasters (Pich, Dean and Punjaisri, 2014), to develop a low wage and low skill flexible workforce that is flexible and efficient providing labour for the food industry.

This research will explore new regulations and the compliance of licensed gangmasters to UK employment, with the possibility legislation created from the adoption of WTO and EU laws and legislation and their application in UK law from 1994 - 2023 illustrated in Figure 1.1, with Appendix 1.1, that have not been adopted by the GLAA. To enable understanding of the gangmaster sectors, the researcher has designed from WTO, EU and UK laws and legislation and Findings in Chapter 4 supported by the researcher's knowledge of the gangmaster sectors, the researcher's real application of a licensed gangmaster Contract for Service/Zero Hour Contract Model (CFS/ZHCM) displayed and illustrated as Figure 2.3 followed by the researcher's model of a GLAA licensed gangmaster paymaster Managed Services Provider/Programme Model (GLAA/MSPM) illustrated in Chapter 4 as Figure 4.2. This is because on questioning stakeholders who have a vested interest in the GLAA, data is provided to the researcher from participants of two template models; a CFS Model and an MSP Model and in relation to both, it is not clear why some documents at the GLAA were destroyed in line with the GLAA Retention and Destruction policy. Research will include the use of legislation adopted by the gangmaster sectors, with its sweeping deployment across labour sectors as capitalist activity increasing the level of precarious working, by expanding the use and need of workers in Table 1.1 into service sectors (Kessler and Alexander, 2004, October) in the remit of the GLAA. This service sector employs licensed gangmasters and provides a third Research Question:

1.2.2.3 RQ 3. How accurate are the precariat in the GLAA remit recorded in national statistics?

This research will explore the data collection techniques of the precariat in the GLAA remit on a CFS in the UK. By examining Office for National Statistics (2021) records for the precariat in the remit of the GLAA working from a CFS, will assist the project by identifying the precariat as workers and not employees (Barnett, 2018, May 30; GOV.UK, 2015, October 15). A CFS is a ZHC whereby the precariat have no agreed hours with their employer and their income and employment on a CFS is insecure. The National Archives (2023b) provide the EAA1973 (s. 13(1.a)) which lays out a CFS as employment which provides a contract and terms for a CFS, both used widely in the gangmaster sectors as businesses provided by the EAA1973 (s. 13(1.b), s. 13(2), s. 13(3)).

There is some data of GLAA workers [GLAAC3] categorised in Table 1.1, then identified in Table 2.2 (pp. 46-47) and Table 4.28 (p. 191). This includes The Annual Reports and Accounts 1 April 2011 to 31 March 2012 (GLA, 2012, June 27, p. 43) that provide no precariat numbers, but indicate gangmaster licenses increased from 1,817 on the 1st of April 2010 to 1,896 by the 31st of March 2012, in contrast to the DLME strategy that confirmed 1000 licensed gangmasters supplying precariat numbers [GLAAC3] of 460,000 into the farming, food processing and shellfish gathering sectors (Metcalf, 2017). Changes in GLAA leadership provided estimated but gigantic precariat numbers because the GLAA Strategic Assessment 2018-19 reported "high-risk sectors employing some 10 million workers" (GLAA, 2020, October 22, p. 1), later replaced by the GLAA Official: Strategic Plan 2020-23 and Business Plan 2021-22 19 March 2021 (GLAA, 2021, March 19) further confirming the employment of 10 million workers at the same time, in "agriculture, car washes, shellfish gathering, food service, construction, cleaning, transport/courier and food processing and packaging" (GLAA, 2021, March 19, p. 1). The following year and with further changes in leadership although the strategic direction of the GLAA by the DLME remained the same, the GLAA estimated a colossal fall in precariat numbers from 10 million to just 500,000 via 1,086 licensed gangmasters in the GLAA Annual Report and Accounts 1 April 2021 to 31 March 2022 (GLAA, 2022a, p. 9; GLAA, 2022b, p. 9), but there was no coverage of this colossal fall in registered worker numbers by the ONS in any statistics.

Standing's (2011, p. 156) studies detail how the precariat "do not appear on the payrolls of firms", but "productivity appears to rise wonderfully in a boom" (p. 156) as the precariat are recruited without appearing in the ONS data on employment, but then

"employment mysteriously drops less than the drop in output and demand in recessions" (Standing, 2011, p. 156). Testing a variety of ONS data, will indicate whether data understates the actual number of people in so-called employment in the licensed gangmaster sector because ONS statistics are passed to the OECD, IMF and World Bank.

To ensure validity, a University Ethics Application is applied to ensure the researcher's mixed methods single case study is of the highest quality to research (Saunders, Lewis and Thornhill, 2019).

1.3 Research Design

Specifically, as the management researcher, the researcher adopted an objective stance and a critical realist research philosophy with a mixed methods case study research approach (Saunders et al., 2019).

This project identifies a research gap, of the GLAA and the precarious workers in its remit. Bhaskar (2011) describes a critical realist approach as what we see and experience by providing three domains of distinction including the real, the actual and the empirical. All three domains assist Critical Realism and the researcher's argument, by enabling the researcher to merge together real, actual and empirical mechanisms, events and experiences to help the researcher explain that there is little evidence on the emerging theme of the GLAA in the field of regulation in the UK. There is little research that has explored how the GLAA is managed, as it licenses gangmasters and examines the precariat in the food, agriculture and horticulture supply chains.

1.4 Contribution to Knowledge

This is the first research to link together the concept of the 'Precariat' (Standing, 2011) with workers under the regulation of the GLAA and unregulated workers who are mainly migrant labour (Clark and Colling, 2016) in Table 1.1.

The critically realist approach to this research contribution for practitioner knowledge and academics will explore the GLAA placing the precariat into a flexible workforce by protecting gangmasters following the Implementation of the Regulators' Code Principles (GLAA, 2018, September 13), its Labour User Best Practice (GLAA, 2020, March) and GLAA Licensing Guidance (GLAA, 2018b; GLAA, 2020, January), which enables the movement and migration of the precariat by gangmasters to be exploited in food manufacturing and food processing sectors.

This contribution aims to link together the context of regulatory theory and the challenge of coordinating dialogue of political empowerment (Fitzgerald, Hardy and Lucio, 2012, p. 103) with an innovative link with the GLAA to Standings (2011) 'Precariat' studies, because there is a lack of understanding of how some groups of people have been formed, how they migrate, their experience of work and why they work in the UK (Center For Migration Studies, 2025).

This research aims to examine the gap in current social models of employment (Gray, 2013) and will highlight groups of undervalued segregated workers (Heyes, Moore, Newsome and Tomlinson, 2018; Moore and Newsome, 2019) as one specific element of the precariat (Standing, 2011). This study will explore the significance of the bodies in defining the limits of the law and regulations pertaining to the precariat (Standing, 2011) and the GLAA remit specifically.

This study aims to contribute to the limited knowledge about the GLAA and its development, its governance and its actions, relating specifically to GLAA practices related directly to migrant workers and the precariat as defined by Standing (2011). This study will provide a new understanding of how vulnerable the precariat are, and if they lack rights and a voice which is identified in the primary data.

This contribution will add to the academic and practitioner debates concerning precarious workers, with a focus on the precariat (Standing, 2011) in the food manufacturing and food processing sectors in the remit of the GLAA and how UK law has affected them. The researcher will explore WTO, EU and UK regulations and legislation and Acts including the modified Gangmasters (Licensing) Act 2004 included in Figure 1.1, labour market deregulation (Lucio and MacKenzie, 2017; Wilkinson, 2012), EU migrants transported across borders (Fitzgerald, 2007; Tuckman, 2010), deregulated sectors and the tripartite approach underpinned by stakeholders (GLA, 2007, October). The researcher will evaluate if legislation has been expanded to see if licensed gangmasters have been encouraged to organise, plan, and coordinate business strategies to exploit workers via legislation to acquire profit, power, and influence (Forde et al., 2015; Strauss, 2013)

The researcher will provide a discussion and understanding of existing terminology, as researchers' use a variety of phrasing to describe gangmasters and the precariat (Standing, 2011). Academic terminology has been briefly reviewed and then grouped to provide distinctive categories of workers and rebranded gangmasters (Pich et al., 2014).

There is limited evidence of research on the GLAA specifically. Mustchin and Lucio (2020) explore compliance and employment regulation, Barnard and Butlin (2020a) explore laws to protect the precariat and Clark et al. (2022) explore licensing employment regimes for the HCW sector.

The researcher's focus will provide a critical review of links to the GLAA as an emerging agency in terms of employment, and the precariat (Standing, 2011) with the lack of enforcement of individual or collective employment rights as so-called employees, that would assist them in the remit of the GLAA (2025e). In addition, this research will provide a contextual examination of the GLAA and its impact on the precariat to inform growth strategies, policy and practice (Etherington and Jones, 2016a), adding to practitioner knowledge and the academic community to influence wider social theories of the licensed gangmaster sectors in the UK, adding to other employment sectors where precarious work is prevalent, reported for example by Thomas, Etherington, Jeffery, Beresford, Beel and Jones (2020) in the Sheffield City Region of the UK with regard to income deprivation (ONS, 2021, May 24) in retail, hospitality, social care, transport and storage, call centres and public sectors including the National Health Service (NHS).

1.5 Outline of the Structure and remaining Chapters of the Thesis

Chapter 2 provides the Literature Review that enables the researcher to explore their objectives by firstly introducing the 'Precariat' (Standing, 2011) in the GLAA remit. Following this, employment rights and labour exploitation of the precariat (Standing, 2011) will be explored to include deductions and payments from precariat wages as applied via legislation in ONS absent food manufacturing and food processing sectors. Various figures are designed to show how WTO and EU laws and legislation and their application into UK law from 1994 - 2023 with GLAA regulations, have assisted the creation and expansion of a flexible workforce directed by the GLAA.

This chapter continues with a brief history of recruitment agencies and employment businesses as gangmasters that guide the reader to the development of the GLA now GLAA, incorporating the historical transition of overseas gangmasters to the UK licensed gangmaster sector that includes an illustration of the Seasonal Workers Pilot as it becomes the Seasonal Worker Visa Route (SWVR) managed by the Department for Environment Food and Rural Affairs (DEFRA) and the HO. This will include an exploration of WTO and EU legislation and how it was applied in the UK, with the direction of the GLAA provided by the secretariat and constitution with illustrations of HO Governance of the

GLAA in 2024, and the Migration Advisory Committee (MAC) provision of the Seasonal Agriculture Workers Scheme (SAWS) quota numbers sourced from the UK Border Agency (UKBA), with seasonal worker quotas managed by DEFRA and the HO from 2013 - 2025.

This category will highlight examples of the researcher's real knowledge to that of GLAA Technical Issues as subcategories that will describe costs and charges paid by gangmaster clients for services provided by the precariat in Table 1.1 as economic gains from an example of a 5-day week payroll, between a Food Manufacturing Client (FMC) and a Licensed Gangmaster in England, showing subsidies from DEFRA and the UK government that have and do enable benefits to the gangmaster sector for profitability (Clark, 2016).

A pattern of regulatory theory slowly emerges to show how Service Level Agreements (SLAs) have enabled licensed and unlicensed gangmaster sectors to thrive. The powers and strength of gangmaster sectors have increased and flourished providing them with the ability to expand service sectors with their flexible army of labour.

To conclude the Literature Review, HO led GLAA worker employment status is explored both before and after May 2010. This provided the researcher with the resources to create a list of Chronological GLAA Regulations (Appendix 1.1) that may not have been applied to the GLA now GLAA.

Data and collection techniques at the ONS are examined. This is vital to establish if workers in the GLAA remit on a CFS are incorporated correctly in their data and subsequent global data, as the literature aims to link together the context of regulatory theory (Mustchin and Lucio, 2020) and the GLAA to Standings (2011) 'Precariat' studies.

Throughout Chapter 2, neoliberalism as the dominant discourse will help shape and support the research thereby providing the foundations for chosen respondents and participants in Chapter 3, which introduces the methodology including the research philosophy and chosen research philosophical position, the research design with techniques and procedures, and the researcher's chosen concurrent mixed methods research approach used to respond to the Research Questions. This chapter introduces and includes an exploration of GLAA and government documents, EU-UK legislation, semi-structured interviews, a group interview and questionnaires written in both English and Polish. Snowball sampling was a useful tool and enabled the researcher to reach out

to and examine participants of the GLAA including representation of the licensed gangmaster sector and respondents that were primarily the precariat [GLAAC3] that may otherwise have been difficult to reach. Ethical issues are discussed, and data management plans and work plans are introduced to provide timings for each task in the research proposal.

Chapter 3 continues with the Methods by which data will undergo thematic analysis, qualitative analysis and data organisation with any statistical analytical data analysis before the integration and cross validation of all data into new understandings to respond to the Research Questions.

Chapter 4 provides the Findings from historical data, respondent and participant data collated from semi-structured interviews, a group interview and questionnaires, GLAA Emails and Freedom of Information (FoI) requests, GLAA and ONS Emails and ONS data that are integrated and cross validated.

This is followed by Chapter 5 that provides a Discussion of the analysis of the Findings from Chapter 4, by linking text in the 'real' world to the researcher's experience and 'real' observable world (Bhaskar, 2008), by locating GLAA workers in the concept of the precariat in ONS data for gangmaster profitalisation.

Chapter 6 will conclude the research study by providing the Conclusions with a review of all evidence in relation to the Three Research Questions.

Throughout the research study, the term 'Precariat' (Standing, 2011) will be applied to food workers [GLAAC3] in the GLAA remit in the concept of the 'precariat' (Standing, 2011), but where it is not deemed correct to do so, the term worker, food worker [GLAAC3] or GLAA registered worker will be put to practical use.

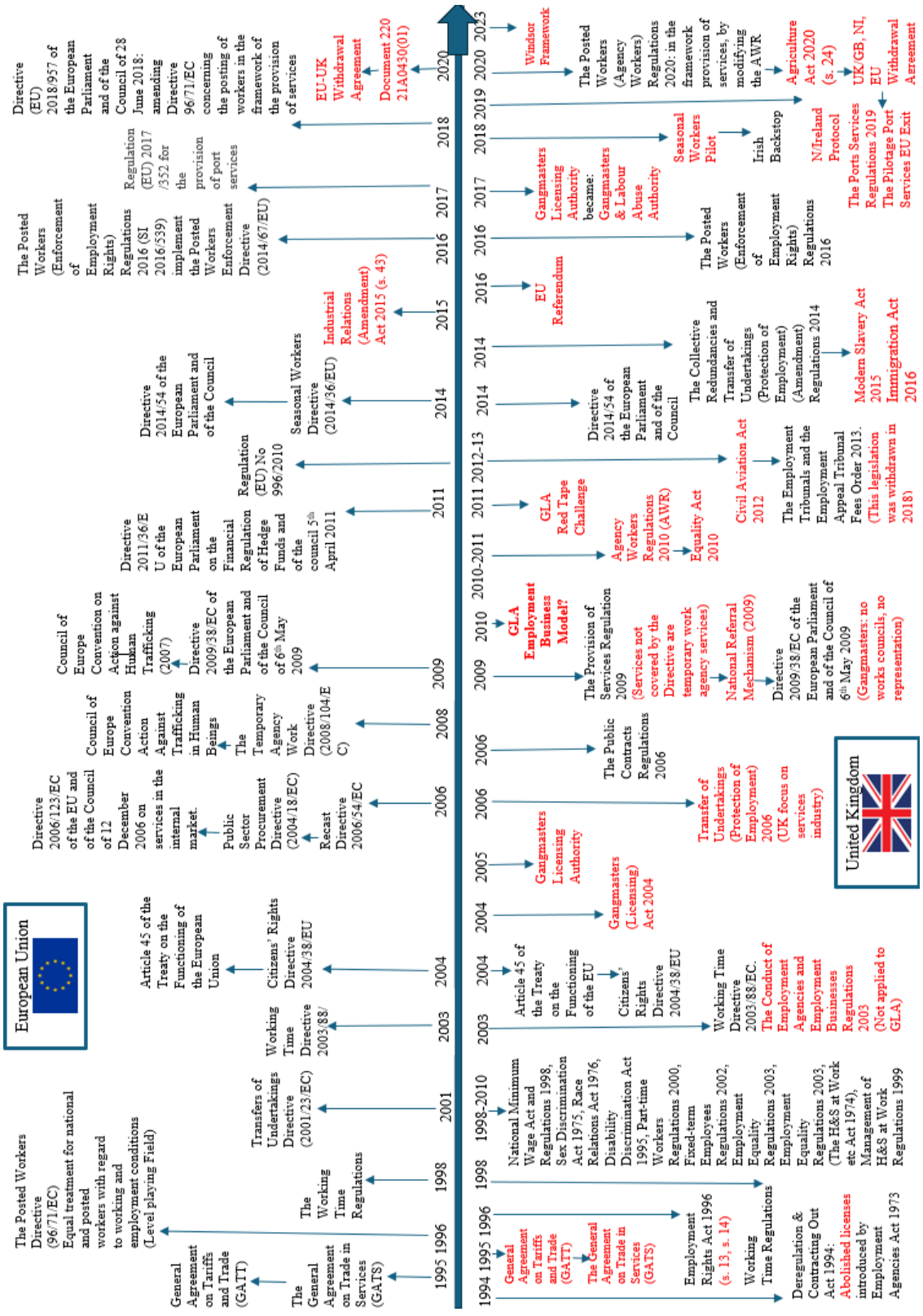

Figure 1.1. WTO and EU laws and legislation and their application into UK law 1994 - 2023

CHAPTER 2: Literature Review

2.1 Introduction

Despite the establishment of the GLAA to tackle labour market problems which now includes all labour sectors in the UK, precarity seems to have expanded as institutional processes with neoliberalism designates precarity as employment to a ZHC. In addition, a CFS which is a ZHC, provides the same including the lack of job security and income insecurity with no clear employment status and non-compliance as standard practice (Ioannou and Dukes, 2021; Mustchin and Lucio, 2020). Precarious workers carry out their type of work as the norm in the remit of the GLAA. The GLAA generates precarious workers in non-standard or temporary employment within CFS forms of employment. However precarious workers could be employees or workers as set out by the Gangmasters (Licensing) Act 2004 s.26, employees as per the Agriculture Wages Order (GOV.UK, n.d.) and GLA Licensing Standards (2009, April). Behind the struggles of precarious working [it may be that] the UK government have in the GLA, marginalised the involvement of unions at the GLA and then altered and changed laws and legislation with political expediency to enable the free movement of the precariat in the remit of the GLAA illustrated in Table 1.1, as per Figure 1.1, Appendix 1.1 and Chapter 2. The precariat seem very able to move from the EU via the RoI and their Industrial Relations (Amendment) Act 2015 (s. 43) and the definition of agriculture that includes sorting and packing by the precariat, into NI as an employee using or bypassing the Common Travel Area (CTA) into GB on a CFS via the EAA1973 (s. 13(1.a), s. 13(1.b), s. 13(2), s. 13(3)) and globally into the UK via open border policies (parliamentlive.tv, 2023).

Following Brexit on the 23rd of June 2016 (Hestermeyer, 2016), the UK government have continued to argue for the free movement of goods and services in the GLAA remit via the Northern Ireland Protocol (NIP), NIP Command Paper, NIP Bill and The Windsor Framework (Democratic Scrutiny) Regulations 2023 which provide the foundations for capital from people in meat products (HM Government, 2020, December 17) as goods for services into Investment Zones, Enhanced Investment Zones and Freeports and other GLAA sectors around the UK, later supported by HM Government (2024, January) Safeguarding the Union with extra pieces of legislation including The Windsor Framework (Constitutional Status of Northern Ireland) Regulations 2024 (s. 3), The Windsor Framework (UK Internal Market and Unfettered Access) Regulations 2024 (s. 3), The Marking of Retail Goods Regulations 2024 and the Applicability Motion Regulation (EU) 2023/2419 on the labelling of organic pet food in accordance with The

Windsor Framework: a new way forward (HM Government, 2023, February, p. 9) Article 13 Section 4. By establishing the importance of this research, this Literature Review will now highlight problems associated with this field of study, starting with the 'Precariat' (Standing, 2011) in the GLAA remit. The second category of this chapter moves to the history and creation of the GLAA, followed by the third category with a focus on GLAA Worker/Precariat Employment status and the location of GLAA workers at the ONS.

2.1.1 The 'Precariat' (Standing, 2011)

From around the 1980s a global market system has emerged with a class structure described by Standing (2011) that includes oligarchs at the top of the structure who are the elite with political power and earn money from rental incomes, followed by the salariat who have enjoyed long term employment, pensions and holidays. Further down the structure, the salariat are followed by the proficians who do not seek employment but make money early in their careers but are then endangered of burnout (Standing, 2011). Below the proficians are the prolariat who have always enjoyed long term employment and received union support with welfare states available to support them in times of need. At the bottom of the structure and below the prolariat are growing numbers of the "precariat", that include high numbers of the prolariat that have grown out of a capitalist state.

Standing (2011) created the term "Precariat" from a 'precarious proletariat' defined by precariousness, vulnerability and marginality. Standing (2011) argues the precariat consist of people who work for labour and in some cases work like machines with technology that make people work harder than they are able. This incorporates bogus self-employment and temporary forms of so-called employment. The precariat are exploited in work and outside work because they do not have access to employment benefits and/or social benefits in welfare systems, because they travel to or are taken to where the work is and in any case, the precariat are deemed to be migrants and international workers who are not entitled to UK welfare benefits. The precariat can be separated into three further groups: 1) the marginalised working class 2) the traditional denizens and 3) the educated precariat who having been promised a career, find "there is little prospect of doing so" (Standing, 2011, p. 30). The precariat are fragile and have no resilience to shocks for example the coronavirus pandemic (Standing, 2021) as they seek support sitting on the edge of unsustainable debt dependent on a charitable state. The precariat work from ZHCs with job insecurity, no secure hours, no secure pay and in many

cases, NRPF or welfare. With diminishing security, their freedoms are marginalised as they provide numerical flexibility. Even though the GLAA support and enforce employment rights in the casual labour market (GLAA, 2018, September 13), workers in the GLAA sectors are the precariat because they are not employed on a Contract of Employment (CoE), GLAA workers match the characterisations of the precariat and remain incorrectly absorbed in ONS data, as they compete against each other in the agriculture and food manufacturing and food processing sectors. As UK Gross Domestic Product (GDP) shrinks and productivity flatlines, sectors in the services industries that include the Financial Services Sector account "for 81% of total UK economic output" (House of Commons Library, 2025, May 22). Financial Services incorporate the GLAA remit including agriculture, food manufacturing and food processing which is significant because it is the licensed gangmaster sector that provides workers as the precariat for their FMCs. It is both the precariat and the GLAA sectors including the food manufacturing and food processing sectors that are not correctly defined in statistics at the ONS, that in turn provide statistics to the OECD, IMF and World Bank as systems seem to be set up in a way that do not protect some vulnerable people (Central Statistics Office, 2023, October 17; Office for National Statistics, 2023, December 20; parliamentlive.tv, 2022).

Table 1.1 will argue the gangmaster peripheral worker links together the concept of the 'Precariat' (Standing, 2011) with workers under the regulation of the GLAA. Comparative studies of other sectors that define the 'precariat' include for example hospitality (Ioannou and Dukes, 2021), Latvian migrant workers in factories and Amazon (Kaprāns, 2022), workers that process retail returns (Gorst and Ballantyne, 2021) and workers in the car wash sector (Clark and Colling, 2016). Even though the GLAA support and enforce employment rights (GLAA, 2018, September 13), this thesis offers a form of interpretive dialogue that argues the gangmaster peripheral worker in the category of the precariat in the remit of the GLAA props up financial institutions and government strategies for political dividends and financialisation as goods for services.

Clark et al. (2022) provide an interpretist inductive approach to explore insecure low paid work associated with precarious working, licensing employment regimes, stressing deregulation argued by Lucio and Mackenzie (2017) and a strategic direction offered by the DLME to the GLAA to regulate the HCW sector. Clark et al. (2022) suggest migrant workers in the car wash sector are exploited in informalized regulatory workplaces with employers condoned by lawful businesses including construction (Vershinina et al., 2018), horticulture (Barnes and Cox, 2007; Barrientos, 2008; Barrientos, 2013; Rogaly,

2008), nail bars (Independent Anti-Slavery Commissioner, 2017), garment manufacturing (Barrientos, 2013; Hammer and Plugor, 2016; Hammer and Plugor, 2019; Jenkins, 2020; Labour behind the Label, 2023), factories and Amazon, (Kaprāns, 2022) and local supermarkets (Ram et al., 2020). Profits increased as the replaceable precariat are temporarily recruited and their numbers expanded (Standing, 2011). Clark et al. (2022) outline how the GLA was established by the Gangmasters (Licensing) Act 2004, its original objectives were to investigate licensing offences. Their qualitative case study of car wash work incorporates formal and informal semi-structured interviews with GLAA strategists, leaders of the Responsible Car Wash Scheme (RCWS) and trade unions. The study was developed using grounded theory in a purposive sample of HCWs to develop the ideas with direct observation, with snowball referrals for participants with digital methods including Google to map HCW locations as a cluster analysis. Findings from analysing and integrating a variety of data, provided for a House of Commons inquiry into HCWs and the possibility of breaches in employment regulations (House of Commons, 2018, November 15).

There is a need to look further at the findings and government responses because although Clark et al. (2022) makes a connection to the GLAA for investigatory purposes, it does not make use of GLA/GLAA historical literature and connections between DEFRA, the GLAA and how some legislation is applied in gangmaster sectors be they licensed or not. Written evidence submitted by the GLAA (2018, May) and Written evidence submitted by DEFRA (2018, June) refers to ONS employees in the ONS Annual Survey of Hours and Earnings (ASHE) 2017 which does not incorporate GLAA registered workers. In their evidence, the GLAA and DEFRA made no attempt to provide information in relation to GLAA workers and their employment status (GLA, 2010, April 21a), resources for workers in different languages (GLAA, 2025d; GLAA, 2025e) and their use of a CFS with economic drivers in yearly updated GLAA Charge Rate Guidance (2022, April) (See Appendix 2.1). Providing high level decision making, HMRC had some involvement in the creation of the RCWS and referred to GLAA workers as ‘workers’ and licensed gangmasters as ‘employers’ [and not as businesses] (House of Commons, 2019, February 1, p. 4) and for not “administering PAYE correctly for each of their employees” (House of Commons, 2019, February 1, p. 5). Nonetheless, HMRC confirm that any evidenced patterns of suspected or potential criminality would be referred to the Crown Prosecution Service (House of Commons, 2019, February 1, p. 4). Clark et al. (2020) exposed the weaknesses of the licensed gangmasters in the HCW sector; however, the House of

Commons (2018, November 15) would support the DLME for a full licensing scheme for the HCW sector to be mandatory as an enforcement legal requirement following the trial of a licensing scheme that brings together major compliance requirements.

Pickford, Sharma, Barratt, Clark and Hunter (2022) with support from the GLAA provided through the RCWS (GLAA, 2022b, p. 20) provide an update on the RCWS whereby additional funding from the HO Prevention Fund supported the Nottingham Trent University, the GLAA and the RCWS to carry out pilot tests of the RCWS with the local authority in Slough, in Luton the RCWS took effect on its own, in Hillingdon the GLAA tested and in Watford the car wash sector was monitored for changes to interventions including the role landlords play in the car wash sector, car wash sector visits with the Police and/or solely by engagement via the RCWS. Pickford et al. (2022) recommended further interventions including increased interventions to deteriorating standards. Following an evaluation, further tests will be carried out in Leicester, Norwich and Ipswich. The government continues to ignore DLME recommendations (HC Deb., 3 May 2023) by providing a Responsible Car Wash Scheme (GLAA, 2018, October 22) supported by major retail brands including Tesco, Sainsbury's, Morrisons and Asda and audited by the GLAA with information shared with regulators and government. Major retail brands support the RCWS because it is a voluntary accreditation scheme. The HCW sector remains the only sector that carries voluntary accreditation to share information with regulators and the government.

To support academia and policy change, this research contribution provides a powerful and reliable stable conceptual framework designed with critical realism that defines distinct categories of peripheral workers shaped by neoliberalism. This is contrasted by Hardy (2017), Munck (2013), Choonara (2020) and Umney (2022), who argue that an evidenced conceptual framework would not help define precarity because precarity is intrinsic to capitalism, but not the precariat. In contrast to their argument, critical realism identifies the GLAA registered workers in the concept of the Precariat (Standing, 2011), with the divide between public and private sector gangmaster business so-called employees clear to see.

Moreover, critical realism also shines a light on how the lack of any classification of peripheral workers in the concept of the precariat (Standing, 2011) has contributed to thriving gangmaster sectors, with the expansion of precarity by gangmaster businesses via CFS/ZHCMs and GLAA licensed gangmaster paymaster MSPMs (Figure 2.3, p. 59

and Figure 4.2, p. 158), that prop up the Financial Services Sector, thus contributing to incorrect ONS data. Incorrect data has and is then applied via the Barnett formula that has contributed directly to the Cost of Living crisis that Lord Bevin and Prime Minster Attlee had sought to avoid following WW11.

This research provides not just the conjuncture that has not changed, but the conjuncture that has been expanded. This research has generated a "stable conceptual toolbox" (Umney, 2022) which includes the researcher's critically realistic concept of the HO led GLAA/MSPM where the precariat as an army of 10 million are assembled as commodities of their gangmaster paymasters, which in turn forms part of the CLCS headlined by Heaths EAA1973, providing profitalisation for stakeholders as neoliberalism gripped the UK.

2.1.1.1 Checking Employment Status: Precariat at the GLA (now GLAA)

The GLA sought guidance from DEFRA, the Department for Business, Innovation and Skills (BIS), HMRC, and the UKBA for the GLA 26/8.4 Position on Checking Employment Status (GLA, 2010, April 21a) to decide through their inspection process as to "whether a person is genuinely "self-employed", a "worker" or an "employee" (p. 3) and when considering "whether a person is self-employed as opposed to being a worker or employee" (p. 4). However, the employment status of GLAA registered agency workers, is 'worker'. Workers in the food manufacturing and food processing sectors in the GLAA remit are therefore workers on a CFS with no clear employment status and no employment rights.

The Twenty-Sixth Board Meeting of the GLA (2010, April 21c) provides an early indication of how the "REC is currently working with employment businesses to help hirers achieve a more diverse workforce, and notes EHRC has never taken a position on practices such as recruiting only through agencies in another country" (2010, April 21c, p. 2) with the following board meeting held in Nottingham on the 16th of June 2010.

In May 2010 the Conservative and Liberal Democrat parties formed a Conservative led Coalition government. Prior to its formation, the REC and Association of Labour Providers (ALP) had lobbied the GLA and Labour Government for agreements to other practises including changes to transport charges and deductions, they challenged employment status and following the Equality and Human Rights Commission (EHRC) presentation on the exploitation of workers in the meat and poultry processing sectors, the REC and ALP had sought to recruit workers from other countries, but had failed

(GLA, 2010, April 21c). Further discussions would be held on the 16th of June 2010 in Nottingham.

Minutes of board meetings and liaison meetings held at the GLA from April 2010 to November 2010 and GLA Annual Reviews and Executive Summaries from early years have all been removed from public records.

2.1.1.2 Contract for Service (CFS)

A CFS is a ZHC and can be used within an SLA which incorporates all charges in relation to the illustration of legislation in any Model. The term "employment" is used in this model because the precariat illustrated in Table 1.1 and Table 2.2 (pp. 46-47) are referred to as employed by the GLAA, stakeholders, government and the gangmaster sectors. The licensed gangmaster is not obliged to give workers as agency workers on any CFS any work, workers as agency workers are not obliged to carry out any work. A CFS is important for GLAA policy and gangmaster sectors because it provides the Terms of Engagement for PAYE Agency Workers (contract for services) (REC, 2023) and is used as per the EAA1973 (s. 13(1.a), s. 13(1.b), s. 13(2), s. 13(3)), whereby employment includes a 'worker' under a 'Contract for Service' from a 'business' with a 'view to profit'.

To supplement this, the UK government seems not to provide any guidance in relation to a Contract for Service and links to legislation as applied in the gangmaster sectors illustrated in the researcher's concept as Figure 2.3, or SLAs, and/or the correct application of the AWR and TUPE which may not have been applied correctly by the licensed gangmaster sectors. TUPE is for employees and therefore does not apply to gangmasters with peripheral workers. This information is not provided to GLAA workers in the concept of the precariat (Standing, 2011) in GLAA Workers' Rights Leaflets (GLAA, 2025a; GLAA, 2025b; GLAA, 2025c; GLAA, 2025d).

2.1.1.3 Deductions and Payments from GLAA workers' payslips

This section of the thesis is very important because GLAA workers in the concept of the precariat in Table 1.1 have legal deductions and payments from their wages. Sourced empirically from GLA literature, are failed discussions between gangmaster trade associations with the department for Business, Enterprise, and Regulatory Reform (BERR), BIS and HMRC. Gangmaster trade associations the REC and ALP then met with the Low Pay Commission (LPC) for assistance with legal deductions from worker

wages (GLA, 2009, July 7). The GLA had sought advice from government departments regarding the selling of insurance products and transport deductions to GLA now GLAA workers, the abolition of the Agriculture Minimum Wage (AMW) and the Worker Registration Scheme (GLA, 2009, July 7) which was closed from the 30th of April 2011. Gangmaster trade association discussions had failed with the department for BERR, however it is not clear when failed discussions were changed, because legal deductions and payments are made by workers that are deducted or collected by gangmasters illustrated in the researcher's model of any GLAA/MSPM (Figure 4.2).

Lawful deductions could include those directly to gangmasters for legal expenses "arranged through Locktons" (GLA, 2009, July 7) a large independent insurance brokers with Private Equity insurance (Lockton, 2024a; Lockton, 2024b) that could be sold as an insurance product directly to workers, even though a FMC must have in their workplace an insurance policy for its workforce which would include their own employees and workers illustrated in Table 1.1.

Licensed gangmasters sell personal accident insurance products to workers in the concept of the precariat through ghost brokering or direct selling of personal accident insurance (Plimmer and Rigby, 2014, January 23), the selling of prepaid credit cards to people from other countries that require no credit checks but provide charges and fees as workers transfer money onto them (Money Helper, 2025) and anything similar to workers are exploitative measures, because they create additional revenue sources for licensed gangmasters who earn commission when the insurance is signed for, or a card initiated.

The Employment Rights Act 1996 (s. 13) authorises employers which includes licensed gangmasters as businesses, to deduct from workers' pay (Tuckman, 2005). Licensed gangmasters Blue Arrow, Acorn, Taskmaster, Randstad, Meridian and Staffline sold products shown as deductions to workers and argued they did not profit from selling their employees insurance (BBC News, 2014, January 23; Insurance Times, 2014, January 23; Plimmer and Rigby, 2014, January 23) as agency workers 'opt in' and agreed to pay for personal accident insurance. However, workers are not employed, and therefore it is argued it is illegal to carry out lawful deductions in this way because workers on a CFS/ZHC do not have guaranteed weekly hours. In addition, migrant workers [GLAAC3] in the GLAA remit may not clearly understand that they are not employed, and should they work under a CFS with unknown hours for example 6, 10, 15 or 25 hours, then weekly insurance payments are still deducted from their weekly pay, shown after tax on their payslip. It is not clear how many GLAA workers have taken up the offer of

insurance products and prepaid cards because the GLAA (GLA, 2014, January) does not provide guidance to workers opting for personal accident insurance, although the GLAA provides guidance of prepaid cards as a prepaid debit card for wages in breach of GLAA Licensing Standard 7.1. GLAA guidance assumes the workers are employees because any prepaid credit card charges could take the worker below the NMW threshold because fees are paid to activate the card when the worker initiates its use.

2.1.1.4 The Precariat and the Absent Food Manufacturing and Food Processing Sectors

Heasman and Morley (2017) explore the crisis of labour shortages in food manufacturing, detailing their search for labour and employment accompanied by a search for skills. Their research examined six broad themes around the pressing issue of Brexit including anti-poverty strategies, re-building and the impact of food-related labour casualisation on local communities and the monitoring of stakeholders of their workers. The briefing paper reviews skills and careers, food marketing and labour market trends, and the increase of EU migrant workers in the UK working in temporary work from a ZHC with the AWR providing workers with pay parity. Data provided by Eurostat data collection methods used in this report, provide trends in food manufacturing employment from 2006 to 2015 (Heasman and Morley, 2017, p. 15), but this data does not separate food employees from GLAA registered workers because this would identify workers under a CFS. In addition, although workers as GLAA workers in the regulated sector are not confirmed in this report, Heasman and Morley (2017, p. 15) provide their illustration of UK food processing industry employment breakdown sourced from ONS data in 2014, that does confirm 'employed worker' numbers in fruit and vegetable, dairy, bakery and other food products and meat products. Although not an ONS requirement, this is easy to resolve for example, Growth by non-standard ranges (ONS, 2021, February 16) incorporates PAYE business statistics that incorporate businesses count of employment and turnover of their number of people classed as 'employees', therefore workers in the GLAA remit can be counted and their worked hours can be applied.

2.2 History of the GLAA

2.2.1 Historical development of the GLAA

Moving under the remit of the Home Office in 2014, the Immigration Act 2016 changed the GLA to the GLAA which continued as a new actor in employment and IR (Heery and Frege, 2006) incorporating the Modern Slavery Act 2015, the Immigration Act 2016 and creating the post of the DLME and IASC. The statutory role of the GLAA is responsible

for issuing and revoking gangmaster licenses. The GLAA functions in accordance with the DLME strategy as its remit was extended to prevent, detect and investigate worker exploitation across the entire UK economy. All references in relation to the GLA, should be read as those of the GLAA as the Gangmasters (Licensing) Act 2004 (s. 22(A)) was amended. The GLAA now had the ability to request assistance from other agencies, to apply powers under the Police and Criminal Evidence Act 1984 (s. 114(b)) by LAPOs in England and Wales by introducing Labour Market Enforcement Undertakings (LMEUs) and Labour Market Enforcement Orders (LMEOs) as triggers of offences under the Gangmasters (Licensing) Act 2004 and the National Minimum Wage Act 1998. However, changes had been made to the EAA1973 (s. 9) on the 12th of July 2016 which is one month after Brexit on the 23rd of June 2016 and two months following the implementation of the Immigration Act 2016 (s. 19) which received Royal Assent on the 12th of May 2016, which prevented GLAA LAPOs from triggering offences under the EAA1973 s.9 which includes offences under s.13, thus providing open routes for gangmasters with workers in the concept of the precariat (Standing, 2011) to move in and out of Northern Ireland and then England, Scotland and Wales.

Figure 2.1 (p. 29) illustrates the Structure and Home Office Governance of the GLAA in 2022, with governance linked to the HO Secretary of State, to the Parliamentary Under Secretary of State, then directly to the GLAA Chair and GLAA Chief Executive (CE) and Board Members. GLAA Annual reports (GLAA, 2021, March 19; GLAA, 2022b) show a high turnover of senior board members with recent changes in senior leadership providing Agriculture and Horticulture board representation (GLAA, 2024a). In 2024, minutes of any GLAA Board, Worker/NGO and Labour User/Labour Provider meetings are not accessible on the GLAA website. However, the HO Director of Safeguarding confirmed LAPO powers to the DLME and GLAA that included acting for the purposes of the EAA1973, National Minimum Wage Act 1998, Gangmasters (Licensing) Act 2004 (s. 14) and the Modern Slavery Act 2015 Parts 1 and 2 (GOV.UK, 2024, January 26; Home Office/GLAA, 2018, August, p. 34). However just two days later, the BEIS Secretary of State informed the DLME and GLAA of reduced LAPO powers, whereby LAPOs could not act under the NMW1998 (ss. 19-19(H)), and the EAA1973 (ss. 3(A)-3(D)), thus providing for breaches in the NLW and a lack of enforcement, with GLAA systems and processes needing attention for example access to “the Crown Prosecution Service; financial intelligence and investigation” (Her Majesty’s Inspectorate of Constabulary and Fire and Rescue Services, 2019, p. 19) (HMICFRS). Nonetheless, the

DLME continued with strategic guidance to the GLAA, the EASI and the HMRC NMW team because the Immigration Act 2016 (s. 2) designates the DLME to provide yearly labour enforcement strategies which assess labour market enforcement activity. Even though concerns were raised with regard to the effectiveness of the Police and Criminal Evidence Act 1984 (PACE) powers at the GLAA and disruption sanctions from the National Crime Agency (GLAA, 2022b, p. 25), the GLAA, EASI and the HMRC NMW team would be responsible for ensuring the initial aims of GLA labour licensing, H&S standards, and workers' rights continued because they are responsible for carrying out labour market enforcement functions.

The GLAA licenses gangmasters that must operate in accordance with the EAA1973 and some provisions of The Conduct of Employment Agencies and Employment Businesses Regulations 2003, which resurfaced having been suppressed by The Gangmasters (Licensing) Act 2004, following its reintroduction by The Gangmasters (Licensing Conditions) (No 2) Rules 2006. This is because the GLA was responsible for licensing gangmasters in limited sectors in the UK including agriculture, horticulture, shellfish and some areas of food manufacturing and food processing, whereas the GLAA covers exploitation in all labour sectors in the UK, as well as responsibility for licensing gangmasters in the same GLA areas but not for example food packaging as per the GLAA (2024, January 18, p. 8) because food packaging was removed via The Gangmasters Licensing (Exclusions) Regulations 2010.

The EAA1973 and The Conduct of Employment Agencies and Employment Businesses Regulations 2003 were not replicated by the GLA now GLAA. The Home Office leads the GLAA and all decisions for the GLAA are approved by the HO Permanent Secretary with annual reviews or earlier reviews should there be "a significant change in government policy relating to the business of the GLAA". Therefore, as all labour sectors were moved into the remit of the GLAA and the HO led the GLAA from 2014 (Home Office/GLAA, 2018, August, p. 5), the Home Office is responsible for ensuring the GLAA provides any information pertaining to Figure 2.3 and 4.2 to HMRC, HM Treasury (HMT), and the provision of any data to the ONS in relation to Table 4.28. In addition, the Home Office is responsible for making clear that any GLAA regulations exclude the occupation of workers as care workers [GLAAC2], because the The Conduct of Employment Agencies and Employment Businesses Regulations 2003 sets out Sections 18-22 whereby care workers [GLAAC2] look after vulnerable people, and in

any case, the GLAA investigates the exploitation of workers and not vulnerable people that workers [GLAAC2] care for.

The Department of Trade and Industry (DTI) legislation replicates GLAA rules, amendments by the DTI are replicated by the GLAA.

The researcher describes a confusing picture that has begun to emerge as GLAA licensed workers in the concept of the precariat (Standing, 2011) illustrated in Table 1.1, have had their numbers intentionally expanded within complex supply chains, because there is no clear data of worker numbers illustrated in Table 2.2 and Table 4.28. With some legislation not applied in the UK correctly, the Employment Rights Act 1996 Chapter 18 (ERA1996) excludes gangmasters, legislation as deregulated in Figure 1.1, licensing standards have changed without parliamentary scrutiny, [barriers have been changed for example tax loopholes have been developed that assist stakeholders], industry, business, the gangmaster sectors, and for five decades after the establishment of the EAA1973 that legalised gangmasters, and specifically for nearly two decades after the establishment of the GLA, gangmasters have been enabled to increase their power in UK food supply chains.

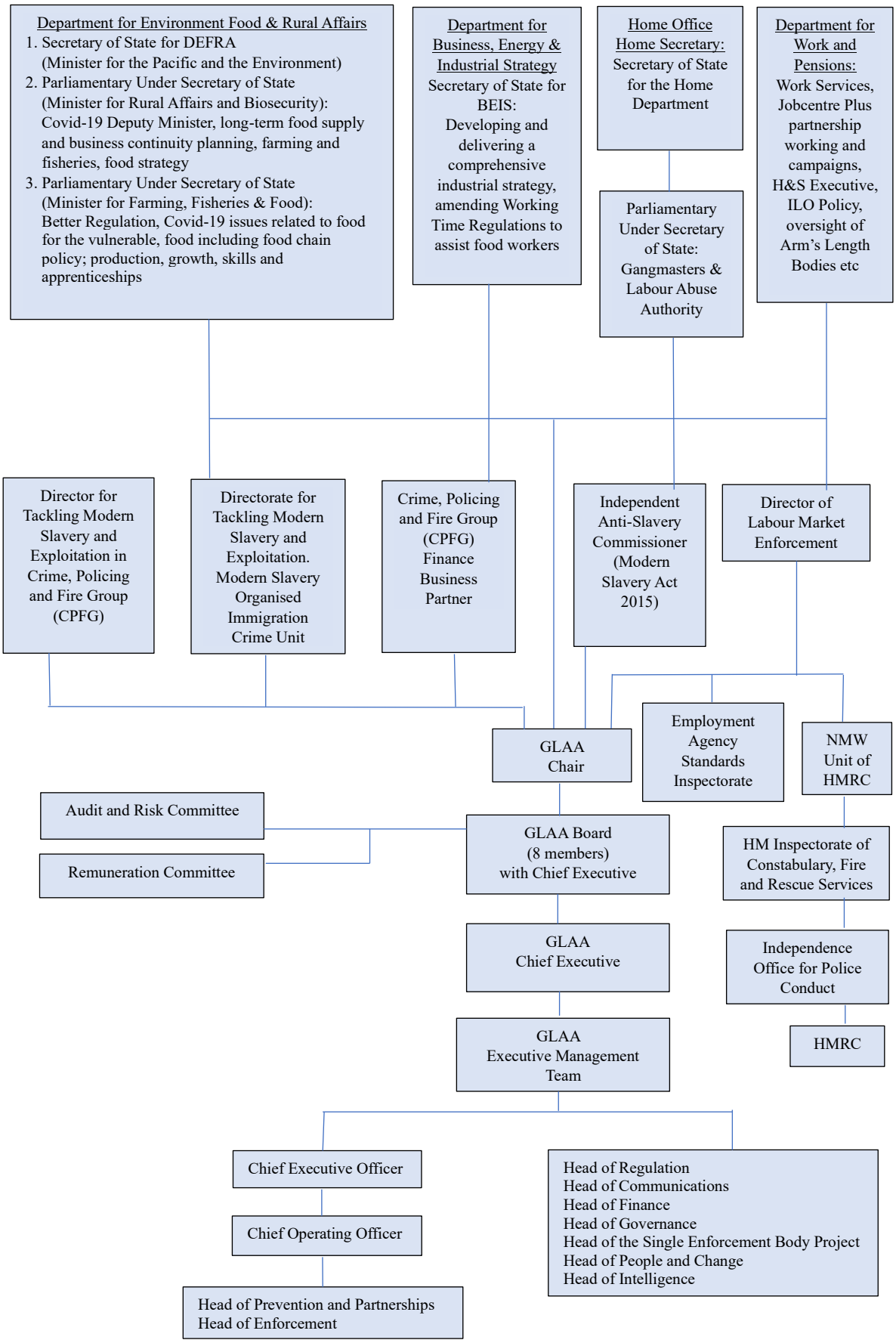

Figure 2.1. Structure and Home Office Governance of the GLAA in 2022

2.2.2 Recruitment Agency or Employment Business

Primarily for this research, it is important to clarify the differences between recruitment agencies and employment businesses that provide services as licensed gangmasters in the GLAA licensed gangmaster sectors. An employment agency can be known as an employment business or gangmaster and is an agency or business or both, that locates and provides people for standard or non-standard employment for their client. Employees can be known as employed or directly employed and are employed on a standard CoE which can be known as a Contract of Service which is a legal contract between an employer and employee that provides terms of the contract that includes employment conditions, employee rights, responsibilities, and duties for either full time, part time, or fixed term work (ACAS, 2023, July 7; GOV.UK, 2024).

An employment agency or employment business as a licensed or unlicensed gangmaster can also provide people with a Temp-to-Hire agreement whereby their client intends to employ the person after a trial period of usually 3-6 months. Employees with a CoE have agreed guaranteed hours and employment terms and conditions, but workers in the concept of the precariat (Standing, 2011) in GLAA sectors working regular hours daily for 12 weeks under a CFS or with no guaranteed hours and supported with the correct implementation of the AWR, should be able to move onto a CoE after 12 weeks. There is no clear legislation that states workers in the GLAA sectors on a CFS should move onto a CoE. This is the opposite to a CoE with regulations stating the employee will move into permanent employment on a CoE.

The Chartered Institute of Personnel and Development (CIPD) provide information with regard to ZHCs (CIPD, 2013), their evolution and status (CIPD, 2022, August) and employer and employee perspectives of a ZHC (CIPD, 2015). It is the CIPD (2015) report that is the most important, because it highlights the confusion surrounding the classification of workers employee status of those as employees on a ZHC, which is not correct. This is also highlighted in a report by Lewis Silkin (2021) who provide their definition of a ZHC, but neither the CIPD, nor the CIPD in partnership with Lewis Silkin (2021) provide a definition of a CFS. The CIPD (2015) report is important because references are made to its content by the DLME and ALP as participants in Chapter 4.

Therefore, a worker or workers in the GLAA sectors working from a CFS are therefore defined below as not an employee, they work from a CFS, which is a ZHC, which in turn is a non-standard Contract for Employment:

A standard Contract of Employment = Contract of Service or Contract in Service (employee, employed)

A non-standard Contract for Employment = Contract for Service or a Zero Hour Contract (not an employee, not employed)

Therefore, a recruitment agency or employment agency or business or licensed or unlicensed gangmaster provide non-standard forms of employment to workers on a CFS or a ZHC because both offer no guaranteed hours. This fits perfectly with gangmaster licensing, deregulated laws and legislation applied into the UK, illustrated in Figure 1.1.

A CFS is a form of a ZHC and therefore, it may be that political discourse and the rhetoric of recruitment agencies and employment agencies have thus influenced others with their own information gathered from their interpretations of employment provided by the REC, ALP, World Employment Confederation (WEC), International Labour Organization (ILO) and DEFRA, blended together with WTO and EU laws and legislation and their application into UK law from 1994 - 2023 (Figure 1.1). A Chronological Order of GLA now GLAA regulations is provided in Appendix 1.1 with many regulations that have never been applied to the GLA now GLAA, enabling gangmasters to not be held responsible for their actions, for example not paying Holiday Pay to workers, and thus providing for precarious workers to carry significant risk because they are responsible for ensuring any of their employment rights.

The following subcategories provide EU legislation applied over the last five decades into UK law that has been adapted to provide free movement of labour into the UK. Failure to provide this information to the GLAA, therefore fails to assist the GLAA in their role to prevent the exploitation of workers.

2.2.3 Employment Rights Act 1996 Chapter 18 (ERA1996)

The CLCS was assisted by the Employment Rights Act 1996 Chapter 18 (ERA1996) that in turn assisted the EAA1973 with s.230(3.b) and s.230(5.b) that applies to employers and their employees. The ERA1996 excludes recruitment agencies and workers. Even though recruitment agencies that are licensed gangmasters and based outside the UK require a GLAA license to supply workers into the UK, the UK has not ratified the ILO

C181 - Private Employment Agencies Convention, 1997 (No. 181) with Article 1 s.1(b), that provides for recruitment agencies, employment businesses and gangmasters to employ workers before supplying workers to their clients as employees as per the EAA1973. In addition, the UK applied The Working Time Regulations 1998 (WTR1998) or Working Time Directive (WTD) in 1998 that set legal rules for employees, but not for workers. Not ratifying the ILO C181 supported by other deregulated legislation in Figure 1.1 and the EAA1973, has provided licensed gangmasters with the ability to expand their services into all sectors of the UK. Licensed gangmasters were further assisted by the application of Article 45 of the Treaty on the Functioning of the EU, and the Citizens Rights Directive 2004/38/EU as below.

2.2.4 Article 45 of the Treaty on the Functioning of the EU (TFEU), and the Citizens' Rights 2004/38/EU at the GLA

In 2006 the UK applied Article 45 of the Treaty on the Functioning of the EU (TFEU) and the Citizens Rights Directive 2004/38/EU. Both EU Directives provide for the free movement of EU citizens and workers in and out of the UK. However, the TFEU (s. 3(a)) states EU citizens can accept offers of employment with Article 46(a) stating there should be "close cooperation between national employment services." The TFEU and Citizens Rights Directive assisted the CLCS by enabling gangmaster sectors to exploit the EAA1973 by offering so-called employment on a CFS without employment rights as per the ERA1996, because GLAA workers are not employed that subsidise big business and undercut UK workers and employees, as GLAA workers were expanded in low skilled sectors for economic gains.

2.2.5 The Gangmasters (Licensing) Act 2004 at the GLA

Conservative Governments have debated licensing gangmasters to reduce fraud and criminality for many years (HC Deb., 25 November 1964; HC Deb., 12 July 1985; HC Deb., 21 May 1997; HC Deb., 27 July 2000). However, in 2004, a Labour Government (Sheridan, 2004) estimated over 3000 gangmasters with 60,000 workers in the agriculture horticulture and food processing and packaging industries, but a Conservative government was unable to provide figures of gangmasters or workers in the HCW sector in 2018 (House of Commons, 2018, November 15).

The Gangmasters Licensing Authority was an organisation tasked with investigating labour exploitation in the UK. The GLA would operate a licensing scheme for

gangmasters operating in the shellfish gathering, agriculture, horticulture and associated food processing and packaging sectors (Sheridan, 2005).

The Gangmasters (Licensing) Act 2004 (s. 27) replaced the EAA1973 and The Conduct of Employment Agencies and Employment Businesses Regulations 2003 because recruitment agencies or employment businesses as gangmasters had to be licensed (s. 6(1)). The Gangmasters (Licensing Conditions) Rules 2009 replicated the provisions of the Conduct Regulations (Conduct of Employment Agencies and Employment Businesses Regulations) 2003, setting minimum standards for gangmasters and the conditions for gangmasters licenses but excluded s.7 providing for employment agencies and businesses as gangmasters to supply workers for services during industrial action.

The Gangmasters Licensing (Exclusions) Regulations 2010 revoked The Gangmasters Licensing (Exclusions) Regulations 2006 providing s.2 circumstances whereby gangmasters would not need a license when they provide workers [GLAAC2] for processing or packing in catering establishments, shops, retail establishments, wholesale markets and establishments, distribution warehouses and other sectors including SAWS.

The Gangmasters Licensing (Exclusions) Regulations 2013 then revoked The Gangmasters Licensing (Exclusions) Regulations 2010 and included additional sectors for example, overseas gangmasters and members or workers at the land agents Royal Institute of Chartered Surveyors and members or workers at the Royal College of Veterinary Surgeons, shellfish gatherers and apprentices supplied by apprentice training agencies and/or gangmaster service providers. Northern Ireland was excluded via The Gangmasters Licensing (Exclusions) Regulations (Northern Ireland) 2014, whereby agriculture activities excluded the industry supply of the processing package of catering in wholesale and retail outlets (Northern Ireland Assembly, 2014, March 11), enabling the free movement of gangmasters and their provision of workers in and out of Northern Ireland and thus in and out of England, Scotland and Wales. There are no clear linkages of recruitment agencies recruiting casual and short time workers for contractual work for the provision of GLAA services, however recruitment agencies are registered licensed gangmasters at the GLAA that assist with the provision of GLAA services. As GLAA licensing regulations were revoked and licensing requirements reduced, it appears that successive governments have encouraged changes to legislation [some without parliament scrutiny] that have permitted the growth of non-unionised workers with no

representation in GLAA sectors, whereby workers are recruited to provide services on a CFS.

2.2.6 Transition: Overseas Gangmaster to a UK Licensed Gangmaster

The Public Contracts Regulations 2006 (s. 4, s. 6) describe an economic operator as a service provider with exclusions of contractors illustrated in Table 1.1 for services.

The Gangmasters (Licensing) Act 2004 applied licensing to gangmasters both in the UK and EU. The Services Directive (2006/123/EC) applied the Country of Origin Principle (s. 8) and free movement of services (s. 12) which includes the free movement of labour in the remit of the GLAA in Table 1.1. The Services Directive (2006/123/EC) s.14, s.21 and s.27 do not apply to temporary work agencies and their housing and transport; however, the Services Directive incorporates agencies/gangmasters and/or as providers and operators concealed in business services (s. 33).

The General Agreement on Tariffs and Trade 1994 Article III (GATT) prohibits the UK from enhancing domestic gangmasters with workers as goods in services, in relation to workers from other countries. This is because the purchase and transportation of GLAA workers afford the National Treatment Principle whereby GLAA workers receive equivalent rights and privileges as UK domestic workers and therefore, should not be 'in excess of' or better than UK domestic workers. However licensed gangmaster workers have not been scrutinised under the "trade effects" test that would measure worker trade flows across the economy.

Nonetheless DEFRA provided advice to the GLA as to how to tackle overseas LPs in UK service sectors (GLA, 2006, October 17), migrant workers were not employed as they were supplied by EU gangmasters to UK based gangmasters, and in addition, some migrant workers moved to the UK on their own accord without gangmaster assistance to be then recruited in the UK as workers (GLA, 2006, October 17).

The Gangmasters (Licensing) Act 2004 (s. 4(2)) describes gangmasters as supplying workers but did not define "supply", but legally, overseas gangmasters would need a license to supply workers. The GLA (2007, April 17) Interim Strategic Assessment made decisions on employment (Heery and Frege, 2006) recommending the GLA "ignore overseas LPs, but take action against UK-based LPs who are found to be using them" under the form of illegal deductions and tax fraud (GLA, 2007, April 17, p. 2). The GLA (2007, April 17) paints a picture of the labour supply chain and their categorisation of

workers. In 2007, DEFRA confirmed overseas gangmasters were to be licensed, prompting an initial allocation of 27 licenses (GLA, 2007, October 18).

The GLA Corporate Plan for 2008-2011 (GLA, 2008a) confirmed an overseas gangmaster required licensing to supply workers into UK licensed sectors. The same plan applied different legislation for overseas gangmasters to meet HO guidelines if they operated SAWS i.e., "the Use of Third Parties/Agents by SAWS Operators as licensed gangmasters" (GLA, 2008a, p. 2), further stating licensed gangmasters "who use overseas recruitment agencies in this way to source workers will be considered to be responsible for the agent's actions" with DEFRA enforcing criminal sanctions by way of an SLA (GLA, 2008a, p. 2).

However, some historical, statutory and functional corporate plans have been changed without parliamentary scrutiny, because as the GLAA came into being, GLAA and HO overseas guidance has changed although it is not clear when, because HO and GLAA guidance does not convey the same message and they do not share all information for example: the Independent Chief Inspector of Borders and Immigration looked at the overarching strategy of the HO with Outcome Delivery Plan 3, and noted responsibilities for an open horticulture route were withheld by DEFRA stating the undeclared/withheld horticulture route was:

> To enable the legitimate movement of people in goods to support economic prosperity, so, unlike other areas we are not necessarily looking at exploitation, we are looking at actual economic prosperity for this inspection (parliamentlive.tv, 2023).

In any case, the GLAA provides overseas gangmasters with the ability to apply for a license from the GLAA from any country in the EU and globally to supply workers with work visas whatever the worker employment status (GLAA, 2024c). Overseas gangmasters must meet GLAA licensing standards and any legal requirements of both countries (GLAA, 2024c), however licensed gangmasters from overseas have the ability to register as an overseas entity with governing laws of tax havens with no Companies House Standard Industrial Classification (SIC) code illustrated later in Table 4.9 (pp. 131-134).

2.2.7 EU Services Directives: Directive 2006/123/EU, Directive 2004/54/EC, and Directive 2006/123EC at the GLA

European Union Services Directives 2006/123/EU and 2004/54/EC were absorbed into UK legislation as The Public Contracts Regulation 2006 and the Provision of Services

Regulation 2009 and relate to the procurement of public contracts to economic operators, which in the UK are service providers. This had therefore included the procurement of contracts including apprenticeships to gangmasters as service providers, economic operators and/or recruitment and employment agencies, even though the EU Services Directives did not include temporary work agencies for the procurement of public contracts, and it is not clear when it was decided gangmaster sectors could administer UK procurement contracts. This is because information of any decision was not shared at the parliamentary inquiry of fraud in contracted employment programmes (National Audit Office, 2012, May 16). In any case, the GLA confirmed little risk of apprenticeships to GLAA workers because their draft GLA Brief X was withheld (GLAA, 2012, May 24).

However, this enabled the government to move industry sectors from GLA licensed gangmaster sectors as part of their Red Tape Challenge (The National Archives, 2013, September 4; HC Deb., 24 May 2012) into the unlicensed gangmaster sector as workers [GLAAC2], thus expanding a low skilled flexible workforce.

In 2006 the UK applied Directive 2006/123EC as the Transfer of Undertakings (Protection of Employment) 2006 (TUPE) to focus on the services industry. However, TUPE has not been included in Appendix 1.1 because TUPE has not been recognised in UK law for tax and National Insurance purposes. TUPE applies to the licensed gangmasters sector as businesses because EAA1973 (s. 13(1.a)) excludes GLAA sectors but incorporates them as businesses EAA1973 (s. 13(1.b), s. 13(2), s. 13(3)) to then provide "employment by way of a professional engagement or otherwise under a contract for services." Be that as it may, TUPE has been applied in the gangmaster sectors and assisted the application of The Public Contracts Regulations 2006 into gangmaster sectors. As SLAs were applied for by gangmasters and accepted by clients in all sectors including in the unobserved GLAA food manufacturing and food processing sectors, TUPE has been used by licensed gangmaster sectors to transfer workers who are not employed from one licensed gangmaster to another which affects the application of the AWR, whereby the AWR starts again for workers from day one in a new job in a different workplace with their new gangmaster employer businesses (GOV.UK, 2025).

The same legislation has enabled the unlicensed gangmaster sectors to carry out the same equivalency illegally and unregulated in both the private sector and public sectors, as frameworks were designed for public sector employees for TUPE to the gangmaster sectors.

UK Public Contracts have incorporated unlicensed gangmaster sectors by taking advantage of the NI CTA, to transport workers into Northern Ireland and England, Scotland and Wales to work under a CFS via deregulated legislation and via regulations illustrated in the researcher's concept of a CFS Model in Figure 2.3 with an SLA, thereby expanding the precarious flexible workforce. As the numbers of workers grew, so did UK employment figures with workers not identifiable, but as employees in UK statistical data (ONS, 2025, July 17).

2.2.8 Application of the AWR at the GLAA

Great Britain implemented the AWR that would provide workers in the remit of the GLAA illustrated in Table 1.1 and Table 2.2 (pp. 46-47) with pay parity and enhanced worker conditions but does not guarantee minimum hours for workers. Northern Ireland implemented The Agency Workers Regulations (Northern Ireland) 2011 that would also provide workers with pay parity, enhanced worker conditions and zero hours. Workers bypass the Northern Ireland Common Travel Area even though they are required to "produce documents in NI" (GLAA, 2023) as the GLAA work with other partners in NI including the NI police who have limited powers including the "powers of arrest and search" as they investigate "forced and bonded labour and human trafficking offences" (GLAA, 2023).

The GLAA provides GLAA standards that create precarious work to qualify for the same pay and employment rights after 12 weeks. However, the GLAA fails to mention workers on a CFS do not carry out the same work hours on a daily basis, therefore they may never meet the qualifying period of 12 weeks to apply for employment on a CoE and in any case, workers are individually responsible for ensuring the AWR via an Employment Tribunal (GLA, 2012). The EAA1973 (s. 13) indicates agency workers on a CFS can be referred to as employees by their so-called gangmaster employers, even though they are not employed by gangmasters. In addition, Brief Issue 22 (GLA, 2012) provides a confusing AWR distinction between an agency employee and workers, by separating agency workers as 'employees' and individuals as female 'workers' who are entitled to ante-natal appointments as below:

> These rights apply from day one of an assignment for agency workers who are "employees." Individuals who are "workers" will be entitled to paid time off for ante-natal appointments once they have completed the 12 week qualifying

period. More information on a labour provider's responsibilities towards the pregnant worker is available in the BIS guidance (GLA, 2012, p. 2).

The GLAA offers guidance for licensed gangmasters on their website. The Department for Business, Energy and Industrial Strategy (2019, October) provides AWR guidance of agency workers that are not employees of their Temporary Work Agency (TWA) or labour provider or licensed gangmaster and therefore cannot be made redundant (p. 49). BEIS guidance provides further conflicting information of how "the equal treatment provision in the Regulations cannot be established where there are genuinely no basic working and employment conditions that apply generally" (Pinsent Masons, 2011, September 6) as neoliberalism expanded GLAA worker numbers with political discourse shrouding any strategies in secrecy, as deregulated legislation including the AWR provided for the expansion of workers in GLAA sectors.

2.2.9 The Immigration Act 2016, and restrictions for GLAA Labour Abuse Prevention Officers (LAPOs)

The Immigration Act 2016 provided PACE powers to GLAA Labour Abuse Prevention Officers (LAPOs) to act for the purposes of the EAA1973 (s. 8(A)), NMW Act 1998 (s. 13) and provided them with the ability to carry out criminal investigations under the GLA Act 2004 (s. 15) and the Modern Slavery Act 2015 (s. 11(A), s. 30(A)). The LAPO role is to approach forced modern slavery or the compulsory exploitation of labour and other labour market offences whilst providing the protection of workers in the concept of the precariat and people with workers [GLAAC1]. LAPOs deliver the 'Prevent' agenda for the GLAA by submitting intelligence to the GLAA and partnership agencies illustrated in Figure 2.1.

The GLAA agenda involves LAPOs arresting gangmasters and other people of exploitation in line with s.2 PACE powers, because "once authorised, GLAA officers have certain powers when investigating labour market offences, such as making arrests, obtaining search warrants, entering private property, searching people and premises, or seizing items of evidential value" (HMICFRS, 2019, p. 8), with s.2 PACE powers listed in Annex A of the HMICFRS (2019, p. 29).

During the coronavirus pandemic, the GLAA (2020, December) held workshops then a consultation with stakeholders including the ALP, REC, the CE of the Royal Society of Arts Matthew Taylor (Taylor et al., 2017), gangmaster providers and users and GLAA auditors and retailers. Stakeholders supplied the GLAA with assistance to the new GLAA

compliance strategy which identified a new GLAA objective to the delivery of a virtual gangmaster licensing scheme, with face-to-face inspections by a LAPO to identify high-risk applications (GLAA, 2021, March 19).

A risk-based approach with a risk profile to identify high-risk businesses was agreed between stakeholders and identified in the Compliance Strategy GLAA-2021 (GLAA, 2021, July), however the GLAA strategy did not receive parliamentary scrutiny. This is the same as the lack of scrutiny and discretionary approach to gangmaster application inspections following the Red Tape Challenge by government in 2013 (GLA, 2013a).

On conclusion of the consultation, the GLAA strategy established the non-compliance of new licensed gangmasters supplying workers that would trigger for example a visit from a LAPO, or a virtual visit to check if the licensed gangmaster was able to meet competency requirements of GLAA licensing standards. Other LAPO visits could be triggered by licensed gangmasters who failed critically to comply with GLAA licensing standards. However, this is not known, because annual reports to parliament have never scrutinised the work of LAPOs.

The HO led GLAA (2021, July) continued their risk-based approach without parliamentary scrutiny of Virtual Application Inspections (VAIs) of new gangmaster applications that would determine gangmaster factors for any physical inspection for example, if the gangmaster business was an umbrella company and was not "meeting the requirements of HMRC as regards the payment of tax" [IR35] (GLAA, 2021, July, p. 7). In addition, stakeholders for example the ALP from their perspective, provide some training to the GLAA, to enable the GLAA to identify non-compliance. The GLAA (2024d) provide their guidance of VAIs, but this guidance does not provide full information in relation to LAPO powers as above, and police powers in Scotland and NI. Therefore, LAPOs are not likely to suspect or locate gangmasters operating illegally, and in any case, doors remain wide open for gangmasters or people with workers [GLAAC1].

Table 2.1 (p. 41) provides an illustration of The Effectiveness of LAPO Enforcement 2020 - 2024, which shows Application inspections total 183 in 2020-21 with numbers not provided in 2022-23, with 123 for 2023-24. LAPO investigations increase with Slavery and Trafficking Prevent Orders (STPOs), Slavery and Trafficking Risk Orders (STROs) with LMEU numbers increasing, with numbers of revoked licenses for 2021-22 and 2022-23 provided in GLAA annual reports. Virtual Compliance Inspections increased during the Coronavirus Pandemic in 2020-21 and from 2021-2023, 90% of licensed gangmaster

Application Inspections were conducted virtually, 50% of licensed gangmaster Compliance Inspections were conducted virtually, with zero virtual inspections in 2024. Compliance Inspections drop from 83 in 2020-21 to a very low figure of 13 in 2022-23 with no virtual Compliance Inspections in 2023-24, whereby Compliance Inspections increased to 76 in 2023-24 with zero numbers of virtual overseas Compliance Inspections carried out in 2022-2024, then confirmed by the GLAA (2024, January 18).

The Effectiveness of LAPO Enforcement 2020 - 2024			
Year	LAPO Role: Compliance Inspections, Application Investigations, Investigations, National Referral Mechanism (NRM), LMEUs etc	Citation	Physical Attendance or, Desk-based Virtual Application Inspections (VAIs)
2020-21	Compliance Inspections: 83 Overseas Compliance Inspections: 3 Application Inspections: 183 Revoked Licences: 17 Investigations (197 GLAA led): 250 Modern Slavery Convictions: 0 Slavery and Trafficking Risk Orders: 4 LMEUs: 0 Licenses refused: 0 New Gangmaster Licenses: 0 Potential victims supported: 7,728 NRM/Duty to Notify: 10/92 Money recovered for workers: £14,865.26	GLAA (2022b, p. 18) GLAA (2022b, p. 9) GLAA (2022b, p. 18) GLAA (2022, December 12, p. 17) GLAA (2022, December 12, p. 10) GLAA (2022, December 12, p. 68) GLAA (2022, December 12, p. 14) GLAA (2022b, p. 6) GLAA (2022b, p. 15)	Virtual (GLAA, 2022, December 12, p. 9)
2021-22	Compliance Inspections: 61 Overseas Compliance Inspections: 18 Application Inspections: 197 Revoked Licences: 4 Investigations (241 GLAA led): 315 Modern Slavery Convictions: 2 STRO/STPOs: 10 LMEUs 6 Licenses refused: 0 New Gangmaster Licenses: 0 Potential victims supported: 6,024 NRM/Duty to Notify: 19/30 Money recovered for workers: £78,922.08	GLAA (2022b, p. 18) GLAA (2022b, p. 9) GLAA (2022b, p. 9) GLAA (2024, January 18, p. 15) GLAA (2022b, p. 9) GLAA (2024, January 18, p. 22) GLAA (2024, January 18, p. 22) GLAA (2024, January 18, p. 22) GLAA (2022b, p. 9) GLAA (2022b, p. 9) GLAA (2022b, p. 9)	Virtual (GLAA, 2022, December 12, p. 9)
2022-23	Compliance Inspections: 13 Overseas Compliance Inspections: 0 Application Inspections: 0 Revoked Licences: 4 Investigations: 0 Modern Slavery Convictions: 3 STRO/STPOs: 22 LMEUs: 7 Licenses refused: 9 New Gangmaster Licenses: 24 Potential victims supported: 4,598 NRM/Duty to Notify: 57/180 Money recovered for workers: £165,582	GLAA (2024, January 18, p. 18) GLAA (2025, November 6) GLAA (2024, January 18, p. 22) GLAA (2024, January 18, p. 22) GLAA (2024, January 18, p. 22) GLAA (2024, January 18, p. 15) GLAA (2024, January 18, p. 15) GLAA (2024, January 18, p. 3) GLAA (2024, January 18, p. 3) GLAA (2024, January 18, p. 3)	Compliance Inspections: 50% virtually (GLAA, 2024, January 18, p. 29)
2023-24	Compliance Inspections: 46 Overseas Compliance Inspections: 0 Application Inspections: 123 Revoked Licences: 5 Investigations: 133 Modern Slavery Convictions: 2 STRO/STPOs: 13 LMEUs: 7 Licenses refused: 14 New Gangmaster Licenses: 0 Potential victims supported: 0 NRM/Duty to Notify: 12/8 Money recovered for workers: 0	GLAA (2025, March 13, p. 19) GLAA (2025, March 13, p. 10) GLAA (2025, November 6) GLAA (2025, March 13, p. 21) GLAA (2025, March 13, p. 10) GLAA (2025, March 13, p. 21) GLAA (2025, March 13, p. 21) GLAA (2025, March 13, p. 10) GLAA (2025, March 13, p. 10)	Compliance Inspections: 0 virtually Application Inspections: 0 virtually (GLAA, 2025, March 13, p. 18)

Table 2.1: The Effectiveness of LAPO Enforcement 2020 - 2024

It is therefore important to note that as the Immigration Act 2016 changed the GLA to the GLAA, changes were also made to the EAA1973 (s. 9) preventing GLAA LAPOs from triggering offences under the EAA1973 which includes offences under s.13 by the gangmaster sectors. This was later captured by Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services (2019) (HMICFRS) who provide their understanding of LAPO PACE powers whereby they state, "legislation had been carefully drafted to preclude GLAA officers from using licensing and PACE powers at the same time" (HMICFRS, 2019, p. 14). This is important because Table 2.1 identifies very low effective LAPO enforcement of Modern Slavery Convictions i.e., 2020-21 there were zero Modern Slavery Convictions rising to just two in 2021-22, three in 2022-23 and two in 2023-24. These constraints were raised as a topic of concern to the HO and the GLAA, but present day, there are no indications that the topics of concern raised in the HMICFRS (2019) report have been resolved.

On the 28th of April 2017, the Home Office confirmed to the DLME and GLAA CE the LAPO PACE powers (Home Office/GLAA, 2018, August, p. 31). This was followed by a letter two days later on the 30th of April 2017 from the BEIS Secretary of State to the DLME and GLAA Chair (Home Office/GLAA, 2018, August, p. 34), that confirmed the immediate deregulation of labour market enforcement functions with drivers of de-regulations issued to GLAA LAPOs to be applied to gangmaster sectors in England and Wales, by confirming LAPOs were prevented from issuing: "Notices of underpayment under the National Minimum Wage Act 1998 (see sections 19 to 19H), or Apply for prohibition orders under the Employment Agencies Act 1973 (see sections 3A to 3D)" (Home Office/GLAA, 2018, August, p. 6).

This left HMRC with the responsibility to issue Notices of underpayment under the National Minimum Wage Act 1998 (s. 19), with warning letters prior to the "consideration of prohibition orders" issued by EASI under the EAA1973 (s. 3). Therefore, notices could not be issued to gangmaster businesses with workers on a CFS because gangmasters are excluded as per the National Minimum Wage Act 1998 (s. 19) and excluded as per the EAA1973 (s. 3).

These additional drivers of deregulation are directed by the BEIS Secretary of State and agreed by the HO, DLME and GLAA, but were already in effect in 2016. This is because the Immigration Act 2016 received Royal Assent on the 12th of May 2016, the Brexit date was the 23rd of June 2016 with changes to the EAA1973 on the 12th of July 2016. The

effects of reduced PACE powers are now captured as licensed and unlicensed gangmaster sectors are enabled to continue their expansion of a non-unionised flexible workforce into the UK via ports, airports, the Eurotunnel and via the RoI, using or bypassing the CTA through Northern Ireland into England, Scotland and Wales to provide cheap labour, to lower the unclear level playing field but at the same time causing severe economic, social and health disparities with hungry adults and children in Yorkshire and the Humber and predominantly in the North of the UK suffering in the Cost of Living crisis, whilst at the same time, continuing to leave the door wide open for the free movement of people with workers [GLAAC1] in the "not at risk" goods section that includes workers as goods for services with the terms 'agriculture' in the Industrial Relations Amendment Act 2015 (s. 43) and 'meat products', 'meat preparations', 'food and other necessary goods' and 'processing' (GOV.UK, 2022, January 2).

2.2.10 Migration Advisory Committee (MAC): Approved Gangmasters and Seasonal Agriculture Workers

The Enterprise and Regulatory Reform Act 2013 (s. 17) ended SAWS. In 2013, the GLA Operation Novalis advised at least 500 agriculture sites that "the GLA is keen to issue a reminder that any business - from the UK or overseas - that supplies workers into the authority's regulated sector must hold a valid gangmaster licence which applies to agriculture, horticulture, food and drink processing and packaging or shellfish gathering" (GLA, 2014, July 16a; GLA, 2014, July 16b, p. 3). Labour Providers acting as licensed gangmasters can have their numbers verified on the GLAA Active Check Service or DEFRA public register.

The Migration Advisory Committee (MAC) (2013, May) does not collect data from the GLAA for food processing and other sector based data and instead collects samples from the Labour Force Survey (LFS) with agriculture data from DEFRA. Nonetheless, DEFRA has a legal responsibility to provide the MAC and ONS with total worker numbers. It is also not clear if the MAC provides the ONS with any estimated numbers of workers used in enhanced GLAA sectors. The MAC illustration of ONS SAWS employed worker quota numbers into the UK from 1994 to 2013 is illustrated in Figure 2.2. Quota numbers of SAWS workers were sourced from the UKBA Management Information data of MAC recorded numbers from A2 countries including the Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia, Slovenia and A8 countries including Bulgaria and Romania. The Migration Advisory Committee (2013) state:

The quota increased from 5,000 at the beginning of the 1990s to 25,000 in 2004 before being reduced in 2005 to 16,250. In Migration Advisory Committee (2008) we recommended, on the basis of evidence we received from partners, that the Government expand the annual quota under SAWS by 5,000 from 16,250 to 21,250 in 2009. The Government accepted this recommendation and since 2009 the quota has remained at this level (Migration Advisory Committee, 2013, May, p. 48).

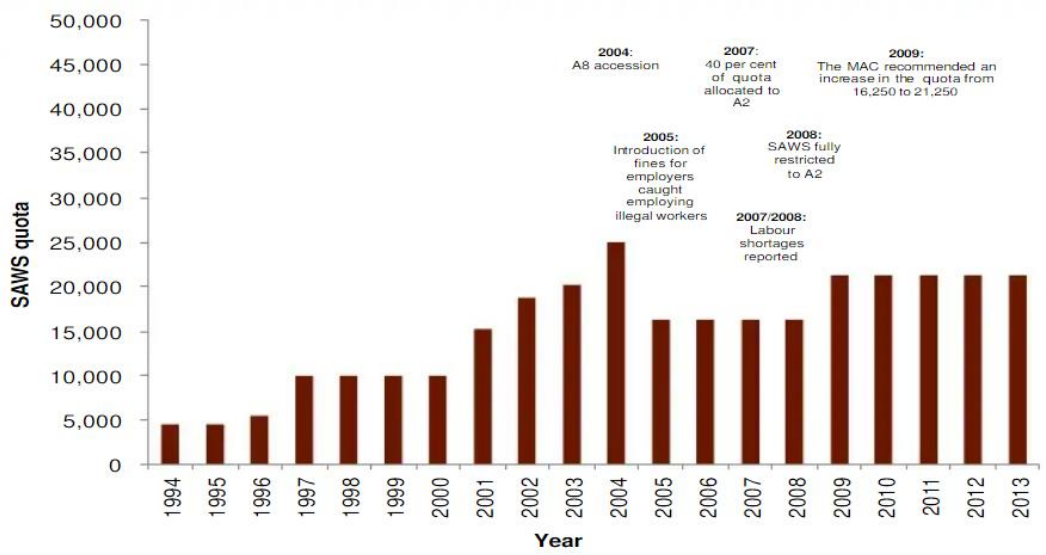

Figure 2.2. The Migration Advisory Committee provide SAWS quota numbers sourced from the UKBA from 1994 - 2013 (Migration Advisory Committee, 2013, May, p. 49)

The Migration Advisory Committee (2013, May) provide numbers of operators/licensed gangmasters and approved HO led SAWS work cards and quotas. The pilot SAWS would operate under the rules of the Home Office, and the Agriculture Wages Board (AWB) would enforce standards in Scotland with a new Trade and Agriculture Commission appointed for England and Wales with previous GLA board members from the British Retail Consortium (BRC), National Farmers Union (NFU), UK Hospitality and the Food and Drink Federation (GOV.UK, 2020, July 10). DEFRA chose two pilot operators/licensed gangmasters to operate the scheme from 2019-2021. This is early evidence of the changing relationship from the GLA and its delegation of GLAA licensed gangmasters, to the HO and DEFRA working together to oversee seasonal worker numbers and licensed gangmasters in the GLAA regulated sector, including the open horticulture route at the UK borders identified by the Independent Chief Inspector of Borders and Immigration (parliamentlive.tv, 2023).

Figure 2.2 illustrates data drawn together from the Migration Advisory Committee (2013, May) and the DEFRA SWVR (GOV.UK, 2022, June 27; GOV.UK, 2023, April 12). Table 2.2 highlights the increase to four operators or licensed gangmasters in 2021-2022 with an intended increase to seven licensed gangmasters between 2023-2024 (GOV.UK, 2022, June 27).

Home Office led Seasonal Agriculture Workers Scheme in 2013, became a Seasonal Workers Pilot, a Seasonal Workers Scheme and the Seasonal Worker Visa Route in 2024		
Year	Number of Visas for workers in non-standard employment on a CFS of 32 hours with the WTD and AWR applied, or CoE of 32 hours plus overtime. CoE remains unconfirmed (GOV.UK, 2023, April 12)	Number of Licensed Gangmasters known as Seasonal Operators including Multiple Operators/gangmasters and Sole Operators/gangmasters
1990s	5,000	
2004	25,000	
2005	16,250	
2009	21,250	
2013	21,250	Multiple Operators: Concordia (YSV) Ltd HOPS Labour Solutions Ltd Fruitful Jobs Ltd Sole Operators: Sastak Ltd S&A Produce (UK) Ltd Barway Service Ltd Haygrove Ltd R&J M Place Ltd Wilkin and Sons Ltd
2019 - 2020	12,500	Pro-Force Concordia
2021 - 2022	38,000: Edible Horticulture Ornamental Horticulture 2,000: Poultry 40,000 Total Visas	Pro-Force Concordia AG Recruitment Fruitful Jobs
2023 - 2024	45,000: Edible Horticulture Ornamental Horticulture 2,000: Poultry 47,000 Total Visas In addition to the hidden economic horticulture route (parliamentlive.tv, 2023), a further 10,000 visas were made available for horticulture GOV.UK (2022, December 19)	GOV.UK (2022, June 27) HO identify the following two operators/licensed gangmasters in their register: AG Recruitment Fruitful Jobs HO to identify five more operators/licensed gangmasters: Three additional horticulture operators/licensed gangmasters Two additional poultry operators/licensed gangmasters GOV.UK (2025, December 22): HO identify the following six operators/licensed gangmasters in their register AGRI-HR Ltd Concordia (UK) Ltd Ethero Ltd

		HOPS Labour Solutions Ltd Pro-Force Ltd R E People Ltd Six horticulture operators and two poultry operators in 2023 (GOV.UK, 2024, August 12): Concordia (horticulture) Pro Force Limited (horticulture and poultry) Fruitful Jobs (horticulture) HOPS Labour Solutions (horticulture) Agri-HR (horticulture) Ethero Ltd (horticulture) RE Recruitment (poultry)
2025 - 2029 (GOV.UK, 2024, May 9)	43,000: Horticulture 2,000: Poultry 45,000 Total Visas Horticulture visas reduced by 2,000 visas. The previous additional 10,000 visas for horticulture available in 2024 are cancelled for 2025 (GOV.UK, 2024, May 9)	GLAA identify the following six operators/licensed gangmasters (GLAA, 2025, March 20) Concordia Fruitful Jobs Pro-force HOPS Re Recruitment (poultry only) Agri HR

Table 2.2: Home Office led Seasonal Workers Pilot became the Seasonal Worker Visa Route managed by the Home Office and DEFRA from 2013 - 2025

Table 2.2 highlights the increase to four operators or licensed gangmasters in 2021-2022 with an intended increase to eight licensed gangmasters between 2023-2024 (GOV.UK, 2022, June 27), with six licensed gangmasters identified for 2025-2029 (GOV.UK, 2024, May 9).

It is part of the LAPO role to provide the MAC with numbers of workers that have and currently could be supplied by licensed and unlicensed gangmasters into the UK. Unlicensed gangmasters are recruitment agencies and businesses and contractors not registered at the GLAA but supply workers to work from a CFS in unlicensed sectors for example textiles, packing, domestic cleaning, hospitality, the care sector and warehousing. It is the LAPO role to investigate labour exploitation in all sectors, but unlicensed sectors do not require licenses, even though many of the same workers move between licensed and unlicensed gangmaster sectors via legislation illustrated in Figures 1.1 and 2.3 as they are transported by their gangmasters to work across some sectors (GOV.UK, 2025). The government accept MAC recommendations because they advise the government on migration issues, but the MAC do not include worker numbers from

the GLAA in their data and the GLAA do not provide the MAC with their registered worker data, even though the GLAA provide registered worker data as per Table 4.28.

DEFRA treats all information provided by operators/licensed gangmasters as commercially sensitive, which argues the HO with DEFRA have some workers on the SWVR illustrated in Table 2.2 working from a CFS with legislation applied from Figure 1.1 as per Figure 2.3, that travel into the UK via open routes at UK borders. The UK Visas and Immigration department as part of the HO, is an executive NDPB that decides who can visit or stay in the UK (GOV.UK, 2023, January 1). The Visas and Immigration department with assistance from DEFRA provide guidance for the horticulture, poultry and any food manufacturing and processing sectors as a "food operative (occupation code 8111)", before scoring each operator/licensed gangmaster application prior to sending letters of recommendation to the HO (GOV.UK, 2022, June 27).

Nonetheless the HO leads the SWVR with horticulture and poultry operators/licensed gangmasters (GOV.UK, 2022, June 27), which could provide for unlimited numbers of food operatives to be provided via the SWVR into all food manufacturing and food processing sectors, because the HO does not provide clear numbers of visas and it does not disclose hidden unobserved travel routes over UK borders from the EU and wider world.

By 2023, licensed operator/gangmaster numbers had increased to six (Figure 2.2) and were marketed by the registered charity ALP and their Just Good Work (2023) App, with recommendations from textile industries including the online fashion textile business ASOS. It is therefore not clear if the HO SWVR is also supplying the textile sector, or if seasonal workers via the SWVR are moved in and out of the textile sector. The HO register provides their list of six sponsors (GOV.UK, 2025, December 22) with two licensed operators/gangmasters operating from previous years, although one sponsored operator/gangmaster had their sponsor license suspended in May 2024 because workers were not guaranteed agreed HO hours, leaving workers in debt because they had taken loans for visas, flights, medical and other costs (The Bureau of Investigative Journalism, 2024, August 24). Five months later and the operator/licensed gangmaster with four different trading names, remained suspended by the HO to supply workers via the SWVR, but the operator/licensed gangmaster GLAA license remains in place enabling this operator/gangmaster to continue to supply workers into the agriculture, food processing, packaging and horticulture sectors in England, Scotland and Wales, whereby this

gangmaster could continue supplying workers to the horticulture sector alongside other GLAA licensed gangmasters.

The Home Office has taken responsibility to ensure operators/licensed gangmasters adhere to all HO guidance, including checking the workers are employed on a CoE following their Certificate of Sponsorship and are paid a minimum of 32 hours at £10.42 per hour (p.h.), with occupation codes 5431 (butcher) and 5433 (poultry dresser) paid a minimum of £26,200 per annum. It is not clear if this is higher or lower than wages paid to UK home employees. The HO does not confirm their ability to check for employment of workers on a CoE. Seasonal workers may therefore be working from their Certificate of Sponsorship on a CFS with a minimum of 32 hours p.w., with the WTR/WTD and AWR applied. Additionally gangmasters are able to average GLAA workers earnings thus enabling them to stop and start the AWR as per temporary rules for seasonal workers in the Immigration Rules (GOV.UK, 2024, April 11), and with a National Insurance Contribution (NIC) cut for employees from the 1st of April 2024 (GOV.UK, 2024, March 12), NIC for GLAA workers as employees as per GLAA CRG would increase from £0.83 p.h. to £1.17 p.h. (GLAA, 2023, April; GLAA, 2024, April).

The Migration Advisory Committee (2013, May) included both multiple and sole operators as separate entities in their report, it is not clear if multiple and sole operators are differentiated at the HO and GLAA.

It is important to mention Sole Operators identified by the Migration Advisory Committee (2013, May) that recruit for their own farms. It may be that a sole operator acting as a licensed gangmaster is not registered on the HO register because they are acting alone (Migration Advisory Committee, 2013, May, pp. 51-52). Sole operators could benefit from inadequate SIC Codes (Standard Industrial Classification) at Companies House and from UK-EU agreements for the movement of workers as goods from the RoI via the NI CTA in and out of NI, England, Scotland, and Wales. Therefore, it is possible sole operators with workers illustrated in Table 1.1, guided by laws and legislation illustrated in Figure 1.1, Figure 2.3 and Appendix 1.1, are enabled to move and circulate their workers individually acting as gangmasters in and out of the UK, because numbers of sole operators acting as gangmasters are not collected, which thus provides a continuation of an open door for the free movement of people with workers [GLAAC1].

2.2.11 GLAA Business Plans and Strategies

Home Office objectives are the security of the UK and the safety and security of UK citizens. The HO also plays a fundamental role in the prosperity of all citizens in the UK. The HO took direct responsibility of the GLAA in 2014 and as part of the Immigration Act 2016, the GLAA is overseen by the HO Secretary of State who also approves DLME strategies. The HO provides oversight and governance of the GLAA (Figure 2.1) which is the UK foremost investigative agency for the disruption and prevention of worker exploitation. The GLAAs statutory role is to prevent, detect and investigate worker exploitation, illegal activity such as human trafficking, illegal and forced labour, and to protect vulnerable people by cutting organised crime in the gangmaster sectors, who should provide transparency as per s.54 of the Modern Slavery Act 2015. The GLAA role includes approving gangmasters, licensing gangmasters and inspecting licensed gangmasters inside and outside of the UK. As part of the Immigration Act 2016, the GLAA has the ability to revocate gangmaster licenses with civil and criminal powers, but the introduction of PACE powers to GLAA officers in England and Wales, Scotland and NI are excluded. In fact, Scotland and NI do not investigate offences or forced labour offences under the EAA1973, NMW Act 1999 or Modern Slavery Act 2015 and in any case, NI was excluded via The Gangmasters Licensing (Exclusions) Regulations (Northern Ireland) 2014.

The GLAA board provides annual reports to parliament for scrutiny. The GLAA Business Plan 2019-20 (2019) together with the GLAA Strategy for Protecting Vulnerable and Exploited Workers - 2019-22 (2019a) builds on the previous GLAA Strategy for Protecting Vulnerable and Exploited Workers 2018 – 2021 (2018a), by changing some GLAA strategic priorities to deliver the GLAA aim of "working in partnership to protect vulnerable and exploited workers" (GLAA, 2019a, p. 2).

It is the statutory responsibility of the HO led GLAA to record licensed gangmaster data and because its remit now covers all sectors in the UK, it is the GLAA responsibility to record both licensed and unlicensed gangmaster data. Although the GLAA secretariat provide approximations of workers illustrated in Table 1.1 in a variety of reports illustrated in Table 4.28 for example 500,000 workers in the GLAA Business Plan 2022-23 (2022a, p. 9), this follows 10 million workers determined in GLAA reports (GLA, 2018, July 19; GLAA, 2020, October 22) and the GLAA Strategic Assessment 2018-19 dated July the 20th which cannot be located on the GLAA website or in the UK National Archives (UKNA), that reflect the performance of three short term GLAA Chief

Executives (GLA, 2018, July 19; GLAA, 2020, October 22, p. 1; GLAA, 2021, March 19, p. 1).

The GLAA (2017a) aimed to "protect all employees, not just temporary workers" showing a commitment to tackling labour exploitation and modern slavery with a focus on workers [GLAAC1], but all the risk is pushed down from the HO, DEFRA, supermarkets, manufacturing industries and gangmasters and passed to GLAA workers who are exploited by deregulatory legislation, a doctrine of neoliberalism (Gamble, 2001).

As neoliberalism became routed within, workers are exploited by intended legislation (Figure 2.3) that has been expanded into other sectors via the Red Tape Challenge (GLAA, 2013, January 28; HC Deb., 24 May 2012) which removed apprenticeships, forestry, cleaning contractors, land agents, voluntary workers and shellfish cultivation from its scope (GLAA, 2013, January 28; HC Deb., 24 May 2012), with this report located in the UKNA, archived eight months following the decision taken by government. A further expansion includes the care sector because the Conduct of Employment Agencies and Employment Business Regulations 2003 (s. 22) and subsequent legislation located in the UKNA was never replicated by the GLAA, providing for the care sector with care workers [GLAAC2] to not be legislated as 'vulnerable' workers. The care sector remains outside of the GLAA remit, however care workers [GLAAC2] are able to work in different GLAA sectors should their gangmaster or they choose to.

Although the HO led GLAA became the UKs leading investigatory body for worker exploitation across all sectors in England and Wales only, their regulatory remit remains with the licensed gangmaster sector, as the GLAA became a platform for both licensed and unlicensed gangmasters with their advisory GLAA CRG explored later in the Technical Issues of the GLAA in subcategory 2.2.12 and Appendix 2.1. The GLAA provides regulatory guidance with eight licensing standards (GLA, 2009, April; GLAA, 2020, January). GLA licensing standards (2009, April) took a proportionate view equipped with licensed standard scores, which were changed in 2013 to a HO risk-based approach (GLA, 2012, April 18; GLA, 2013a; GLA, 2013, December 8; GLAA, 2018b) with no clear licensed standard scores. All eight standards are regulated by the LAPOs, some standards remain the same for example:

- Licensing Standard 7: LAPOs refer to HMRC to investigate underpayments of wages including the NMW

- Licensing Standard 2: Payment of Wages, Tax, NI, VAT: improper deductions and allied matters, for gangmasters to accurately calculate and deduct tax and NIC from all workers' pay and pay the correct amount to HMRC.

Licensing standards 2 and 7 clearly differentiate a 'worker' from an 'employee', and a 'Contract of Employment' from a 'Contract for Service' or ZHC, because licensing standards 2 and 7 are clear advice to gangmasters, to accurately calculate correct deductions of tax and NIC from recruited workers' payslips, before paying the same amount to HMRC on the workers behalf. Although LAPOs and the HMRC NMW team carry out investigations and HMRC refer criminality to the Crown Prosecution Service (House of Commons, 2019, February 1, p. 4), it is important to note that deductions and NIC are not calculated correctly because the GLAA CRG is calculated for Full Time employees and has not been shared with HMRC.

There is no legislation or correspondence that states gangmasters can acquire profits from HO led GLAA licensed gangmasters and unlicensed gangmasters for example from NIC, health and social care levies, holiday pay, apprenticeship levies, Pension Auto-Enrolment (PAE), SSP and maternity pay from workers as their employees.

The GLAA Business Plan (2019) sets out agreed HO led GLAA strategic priorities and objectives in a service framework to prevent the abuse and exploitation of workers, with PACE powers to pursue gangmasters who abuse and exploit workers. The HO aligns the strategic direction of the GLAA service framework to HO objectives, which is designed to address unlicensed activity by supporting licensed gangmaster businesses. The GLA Annual Report and Accounts 1 April 2016 to 31 March 2017 (2018, July 19, p. 1; GLAA, 2020, October 22, p. 1) identified 10 million workers but this number fell rapidly to 500,000 two years later with no clear reason as to how or why (GLAA, 2022a, p. 9).

The HO led GLAA service framework highlighted in the GLAA Business Plan (2019) and GLAA strategy (2019a) was shaped by the GLAA yearly intelligence based assessment with direction from the HO, DLME, IASC, experienced GLAA gangmaster leads in Human Resources (HR), the National Crime Agency (NCA) annual National Strategic Assessment of Serious and Organised Crime and direction from other stakeholders in Figure 2.1 together with GLAA stakeholder advice, thus informing the GLAA of labour market shortages, pilot schemes and regulations pertaining to gangmaster businesses. The HO approved the alignment of both DLME and GLAA strategies with the GLAA Business Plan (2019) designed to support the GLAA strategy

(2019a), by providing six objectives including the identification of and support to victims of labour exploitation, the maintenance of a credible licensing scheme to provide a level playing field, the promotion of compliant business growth by working in partnership with all stakeholders and the protection of workers' rights with the prevention of labour exploitation. However, HO led GLAA objectives change according to intelligence and agreed priorities, the GLAA collates from its stakeholders for example objective two: to "engage with stakeholders to minimise and manage risk" in the GLAA (2018a, p. 3) strategy that is changed to prioritise the development of GLAA employees (GLAA, 2019a). However, HO led GLAA strategies do not state that GLAA priorities should include providing any important data to other government departments including worker data to the ONS. Nonetheless, these two examples mean the GLAA does not prioritise engagement with licensed or unlicensed gangmasters, choosing instead to highlight and create prevention activities with engagement activity in targeted campaigns identified by the HO and non-government associations including gangmaster associations for example APSCo United Kingdom (2025), the REC and ALP. Secondly, worker data is not provided clearly to the ONS, thereby enabling all risk to be pushed down to HO led GLAA registered workers on a CFS who are not visible in high risk sectors including food manufacturing and food processing.

GLAA business and strategic plans should be renewed every three years to cover offences in the Gangmasters (Licensing) Act 2004, EAA1973, NMW Act 1998 and Parts 1 and 2 of the Modern Slavery Act 2015 (GLAA, 2019a, p. 5). The AWR are regulated by gangmasters, but the AWR are not a licensing standard. The actions of virtual GLAA LAPOs to investigate and rate criminal activity and labour market offences in the licensed and unlicensed gangmaster sectors has been scrutinised by HMICFRS (2019), but there are no indications of outcomes to the HMICFRS report. Findings for example, show how GLAA officer constraints have been resolved and in any case, 36 trained LAPOs became face to face LAPOs in 2023-24 (Table 2.1) (HMICFRS, 2019, p. 11). LAPOs rely totally on reported intelligence but at the same time, the HMICFRS "learned that the legislation had been carefully drafted to preclude GLAA officers from using licensing and PACE powers at the same time" (HMICFRS, 2019, p. 14). In addition, any LAPO details of GLAA licence holders are not accessible on the GLAA public register, there is no clear license scoring and there is no scrutiny of sole operators acting as gangmasters identified by the Migration Advisory Committee (2013, May).

The subsequent GLAA performance measures (GLAA, 2020b, p. 5) outline objective targets for 2019-2020 for example in relation to workers: low operational assisted targets of 132 potentially exploited workers, and the recovery of unpaid holiday and withheld wages totalling approximately £20,000. All remaining performance measures relate to licensed gangmaster licenses including: a 68 day target to complete a license application, 166 days to complete a compliance investigation, revoking a license in 14 days, increasing enforcement notices and warnings, and increasing LMEU, LMEO and convictions to less than 30 in England and Wales, only Scotland and Northern Ireland are excluded, even though LAPOs are unable to trigger offences under the EAA1973 s.9 which includes offences under s.13, thus providing open borders for gangmasters with workers in the concept of the precariat (Standing, 2011) to move in and out of Northern Ireland and subsequently England, Scotland and Wales.

Two GLAA business plans and strategies (GLAA, 2020, October 22; GLAA, 2021, March 19) include objectives that highlight the creation of a Single Enforcement Body (SEB), whilst accommodating an expanded operating landscape to include the restoration of withheld entitlements including unpaid holiday pay and withheld wages, all of which then fail to be included in subsequent GLAA performance measures.

The GLAA most recent strategy is their sixth strategy in seven years for 2023-26 (GLAA, 2023a) following earlier business plans and strategies (GLAA, 2017a; GLAA, 2018a; GLAA, 2019; GLAA, 2019a; GLAA, 2020, October 22; GLAA, 2021, March 19). GLAA strategies and business plans are overridden by additional strategies (GLAA, 2020, October 22; GLAA, 2021, March 19) with all GLAA plans and strategies omitting workers on a CFS. This supports the idea that HO business plans and strategies expanded from the 1980s in free market liberalisation have consistently failed to share their use of the CFS, which is supplemented by a lack of enforcement, changes to legislation in the researcher's concept of a CFS Model as Figure 2.3 and actions taken by the HO and DEFRA to support the GLAA. The HO and government do not provide the full picture, as the HO provides open routes at UK borders for example the open horticulture route identified by the Independent Chief Inspector of Borders and Immigration (parliamentlive.tv, 2023), which enabled and enables the HO led GLAA to provide a service platform for licensed gangmasters to expand UK non-unionised flexible labour as a new shop floor, with the expansion of GLAA registered workers that are enabled to criss cross UK borders.

GLAA business plans and strategies are limited to agriculture, arable and edible horticulture and seasonal worker schemes, because GLAA reports exclude some sectors in food manufacturing and food processing including short shelf food manufacturing and pet food. The GLAA is intelligence led by the HO and gangmaster stakeholders and trade associations who seek to expand unobserved workers on a CFS via GLAA service frameworks in GLAA Business Plans and Strategies (GLAA, 2019; GLAA, 2019a).

Licensing processes are linked to sector business models (GLAA, 2021, March 19), but it is not clear what individual business models are, although the researcher's realistic model as Figure 4.2 attempts to provide a guide. Worker employment status and the types of contracts applied in the private sector have not been collected correctly, including gangmaster sectors in manufacturing in NI because the government does not include their use of a CFS in government data. This is the same for all devolved nations including England, Scotland, and Wales (parliamentlive.tv, 2022).

With this in mind, the HO led GLAA are therefore unable to meet objectives in any GLAA strategies and business plans including the GLAA (2019) report. Home Office led GLAA yearly intelligence based assessments and governance have sought to benefit GLAA stakeholder gangmaster businesses and not GLAA workers the GLA was set up to protect, because all risks have been passed down to workers on a CFS that cannot be identified in ONS statistics in England, Scotland, Wales and NI. This is because a CFS is a ZHC, and GLAA workers on a CFS have been separated from agency workers on a ZHC at the ONS. Organisational policies and regulations for example The Gangmasters Licensing (Exclusions) Regulations 2013 (s. 13, s. 14, s. 15, s. 24, s. 25, s. 27), strategic risk registers, team registers and business cases for growth have their outcomes monitored by the HO Secretary of State. However, the HO Secretary of State has not shared their open gangmaster routes into the UK in any of their HO annual reports and/or to the GLAA service framework. This includes routes identified earlier by the Chief Inspector of Borders and Immigration in the HO Outcome Delivery Plan 3 (parliamentlive.tv, 2023).

GLAA strategy maps assist global gangmaster worker strategies with processes designed with assistance from stakeholders and the HO, performance measures and outcomes relate to labour market conditions, and worker data shows a complete lack of understanding of gangmaster sectors. GLAA strategy maps include GLAA values, objectives, performance measures and stakeholder relationships which are flawed at implementation for example the sixth strategy in seven years as the GLAA Strategy 2023-26 (2023a), which is a re-appraisal of their existing work which is unrealistic and therefore will fail for example,

GLAA enforcement operations fail to prevent gangmasters operating illegally in the licensed sectors for example gangmasters identified by respondents in Table 4.9, GLAA workers on a CFS in MSPMs (Figure 4.2) and the GLAA do not provide their registered GLAA worker data to the ONS (Table 4.28).

The HO led GLAA provides a platform for gangmasters inside and outside of the UK to supply workers directly to gangmasters or directly to UK clients to provide services on a CFS (GLAA, 2024c). The HO in turn provides open unobserved routes into the UK via open borders including the NI CTA that provides free movement for workers in the concept of the precariat that are supplemented by a lack of enforcement, virtual LAPOs with deregulated powers, with 'commercially sensitive' worker travel information recorded by the HO and DEFRA

2.2.12 Technical Issues of the GLAA

2.2.12.1 Centralised Labour Control System (CLCS)

From 1973, neoliberalism and the CLCS have exploited the EAA1973 expanding capitalist activity with precariat labour via changes to legislation to enable the free movement or circulation of workers illustrated in Table 1.1 and Appendices 1.1, 2.1 and 2.2 whereby political discourse has shaped them. The consequences and significance of the now highlighted CLCS, is that it essentially consists of open border policies, the non-regulation of gangmaster peripheral workers with the concealment of the precariat in ONS statistics and global statistics. The CLCS has not been shared with UK citizens whereby the EAA1973 headlines the system, expanding precarious working as a hidden army via gangmaster paymasters that apply CFS/ZHCMs that drive down employment standards, terms and conditions.

Present day, it may be the same politics that seek to keep GLAA workers obscured in insecure unprotected work, by enabling laws and legislation created for their free movement because GLAA workers are exploited and at the same time, hidden in the GLAA remit. The researcher's following design reflects those laws and legislation:

2.2.12.2 Design: Contract for Service/Zero Hour Contract Model (CFS/ZHCM)

At the Fourth Labour Provider Liaison Group Meeting the REC request DEFRA views on the "REC model contract for services" (GLA, 2010, February 19, p. 2). It is not clear how DEFRA responded because the following GLA meetings have been removed from public records.

Therefore, the researcher has used GLAA literature and GLAA Briefs with some WTO and EU legislation implemented into the UK illustrated in Figure 1.1, to design and make clear the researcher's realistic concept of a Contract for Service/Zero Hour Contract Model (CFS/ZHCM) referred to by the REC (GLA, 2010, February 19, p. 2), because gangmasters licensed or not, acting as one person, a business, or an agency, require workers to pay for their job.

Legislation in the CFS/ZHCM can be tested against five issues including its funding from SLA levies including NICs because NICs fail to align with numbers of EU migrants (Full Fact, 2016, May 12), the mis-selling of insurance (BBC News, 2014, January 23; Insurance Times, 2014, January 23), so-called abuses of social benefits (Fitzgerald and Smoczynski, 2021), PAYE contributions and the non-compliance of the AWR (Thompson, Newsome and Commander, 2012).

Therefore Figure 2.3 is designed by the researcher to provide an illustration of the researcher's realistic concept of a CFS/ZHCM. This model is a concept of amalgamated laws and legislation identified in the Literature Review from decades of WTO and EU legislation implemented into the UK, combined with the researcher's real experiences and observations.

This design or any CFS/ZHCM cannot be verified by the GLAA, and it is not clear if the HO, DEFRA or the GLAA have a specific model. Even so, Figure 2.3 is designed to provide the reader with new understandings of the GLAA and the lack of fraud compliance, as well as new understandings of GLAA workers in their remit. Therefore, it is important for the reader to note throughout the remainder of this research study, that Figure 2.3 is a realistic concept designed by the researcher to assist the reader with new understandings of the GLAA and the lack of fraud compliance, alongside new understandings of workers in the GLAA remit.

Figure 2.3 is not tested empirically or confirmed by stakeholders, however a CFS Model is used widely in the UK. Analysis of some primary data in Chapter 4 in relation to Figure 2.3 was carried out, which led to a second realistic model to be designed by the researcher known as Figure 4.2, that illustrates a GLAA licensed gangmaster paymaster Managed Services Provider/Programme Model (GLAA/MSPM).

Workers in the concept of the precariat (Standing, 2011) entering the evolving cycle are categorised as employed in for example food manufacturing and food processing, although international gangmasters providing seasonal workers are not included. The

precariat (Standing, 2011) have deductions after tax or make payments identified on their weekly payslips which is legal. Gangmasters receive top up payments in the form of benefits packages, insurance, and transport deductions and from their client as SLA levies.

Throughout the research study, the term Figure 2.3 will be applied in the text to provide an explanation of a CFSM designed with critical realism from amalgamated legislation and data.

Figure 2.3. Contract for Service/Zero Hour Contract Model (CFS/ZHCM)

The lack of fraud compliance identified in Figure 2.3 is directly linked to the following subcategories that start with GLAA Charge Rate Guidance that provides a source of income for licensed gangmasters.

2.2.12.3 GLAA Charge Rate Guidance (CRG)

GLAA Charge Rate Guidance (CRG) is compiled for the GLAA by the ALP. The ALP refer to a DEFRA analysis in both their own CRG (ALP, 2022, April) and guidance they compile for the GLAA, with GLAA CRG Brief Issue 78 - April 2022 illustrated as Appendix 2.1.

Economic drivers include deregulatory legislation and displayed text, both of which are important to gangmaster sectors that encourage the expansion of precarious working. Due to the researcher's realism, Appendix 2.2 illustrates economic gains that are now clear within an SLA that are key to gangmaster income between FMCs and gangmasters. Economic drivers are provided by the GLAA within their yearly CRG Briefs (GLA, 2013; GLA, 2015, May; GLA, 2015, October; GLA, 2016, March; GLA, 2016, October; GLAA, 2017c; GLAA, 2019, March; GLAA, 2020c; GLAA, 2021, March; GLAA, 2022, April; GLAA, 2023, April; GLAA, 2024, April; GLAA, 2025, April).

GLAA CRG recommends a 30% charge rate to be added to the licensed gangmaster sector hourly rates of the NMW/NLW of all workers [GLAAC3] in England, and, for a 30% charge rate to be added to the hourly rates of the NMW/NLW for workers only, in Scotland, Wales and NI, although GLA Brief Issue 1 (GLA, 2009) now removed from observation, had stipulated workers in agriculture should be paid the NMW with worker expenses reimbursed for example travel and subsistence expenses.

Appendix 2.2 provides the researcher's illustration of an example in England of employer/gangmaster economic gains from workers from one FMC. In the example, the precariat (Standing, 2011) are workers under a CFS in the remit of the GLAA and are incorporated on a 5-day week payroll as 1,500 GLAA licensed workers [GLAAC3] across two shifts totalling 750 workers per shift. The illustration of GLAA registered workers is provided with varied hours.

Appendix 2.2 incorporates workers illustrated in Table 1.1 in a 5-day weekly payroll as recommended by the GLAA and ALP including their hourly charge rate levies and costs: the Health and Social Care levy charge, Annual Holiday pay charge and/or Rolled up Holiday Pay as per The Working Time Regulations 1998 (WTR1998) (s. 16(A.2)) in

Appendix 2.1, Apprenticeship levy charge, Pensions Auto-Enrolment charge, SSP and Maternity charges, Overhead and Service Cost charges and NMW charges.

Appendix 2.2 provides the summary of a licensed gangmaster payroll that is concluded directly with the gangmaster or indirectly via an umbrella company who are paid by the gangmaster for payroll services, with a FMC for GLAA worker services paid directly by recruitment managers in the Gangmaster Dominated Migration Regime (Findlay and McCollum, 2013) (GDMR). Gangmasters and stakeholders make economic gains as financialisation (Clark, 2016) from GLAA workers as hidden profits from hourly rates gathered by recruitment managers in the GDMR (Findlay and McCollum, 2013), before account auditing, or financial statement analysis.

2.2.12.4 Charge Rate Guidance: NIC Thresholds

Licensed gangmasters are both employers and recruiters. They employ small volumes of staff for recruitment and general management in standard forms of employment for example a CoE. The recruited workers are in non-standard forms of employment and are not employed with no guaranteed hours on their CFS. Total numbers of recruited workers are not provided to HMRC but they are collected by the GLAA and are available in Table 4.28. However licensed gangmasters only provide numbers of recruited workers to HMRC that exceed certain levels of NICs [as employed] because NICs are paid to HMRC at that time. It is therefore easy for HMRC to check NIC data against worker numbers should HMRC collect worker data and numbers of workers from gangmasters, the GLAA and vice versa.

The UK government (GOV.UK, 2022, February; GOV.UK, 2022, June 22) provide NIC thresholds that are levied on weekly or monthly earnings and not overall income. If the workers in the GLAA remit do not meet the NIC thresholds for the week they work, then the licensed gangmaster sectors are able to retain the NIC that may have been collected from the FMC as per GLAA CRG (GLAA, 2022, April), REC updated template documents (REC, 2021a) and guidance, and from hour one as per the AWR calculator. Collections of NIC deducted by licensed gangmasters from their clients as an hourly rate is a tax loophole for gangmasters. It is also clear that EU migrants and home workers in Table 1.1 have paid NIC for decades indirectly to gangmaster sectors, via loopholes in the UK tax system. HMRC may confirm GLAA workers are contributing to a social security system, even though their immigration status says they have “no recourse to public funds” (GOV.UK, 2025, January 14).

The AWR also provides an additional easy route for gangmaster sectors to collect NIC for the long term, because it provides for a legal route for gangmasters to collect NIC from workers under a CFS by not providing guaranteed work hours or a permanent CoE.

Nonetheless, the gangmaster sectors supply labour to clients and pay Class 1 secondary NIC of worker earnings if the workers meet the NIC threshold. Other forms of economic income paid hourly and under NIC thresholds include holiday pay, and as a company or business they are required to pay Health and Social Care levies (GOV.UK, 2022, September 6). They are also required to pay Apprenticeship levies because they meet the rates and thresholds for employers 2021-2022 (GOV.UK, 2022, February) and if the workers earn more than £10,000, then the workers are automatically enrolled on the Pension Auto-Enrolment scheme (GOV.UK, 2014, December 11). SSP and/or Maternity pay deductions paid by the client, may also be an extra form of income should the client pay for all workers and not just women, hourly on the payroll.

Deregulated legislation provides a GLAA deregulated enforcement regime where gangmasters self-regulate in deregulated sectors. As far as NIC is concerned, the GLAA accept gangmaster trade association ALP CRG that regulates, therefore the GLAA fails to regulate CRG as they assume all workers in their remit are employed full time, which is incorrect and identified in Table 4.28.

2.2.12.5 GLAA Licensed Gangmaster/Economic Operator: Apprenticeship Levies, part of PAYE and NIC for Full Time Workers

Hogarth and Hasluck (2003) carried out several apprenticeship studies for the Department for Education and Skills and following a Review of Skills by Leitch (2006), Hasluck et al. (2008) updated earlier employment research. The Hasluck et al. (2008) report looked at government funding to learning and skills councils, and the structure and effect of funding on people trained in five government frameworks: engineering, construction, retail, business administration and hospitality. Data collected, included yearly training costs and benefits, internal accounts data, HR information and observation where apprenticeships were located.

The Apprenticeship Ambassador Network (HM Government, 2024) now removed from observation, referred to apprentices incorrectly as ‘employees’. The Provision of Services Regulation 2009 encouraged the provision of services between EU states, but it excluded temporary work agencies because they do not employ workers. However, the EAA1973

s.13 provides for temporary work agencies as employment businesses, and therefore provided for Confidential Apprenticeship Agreements in Apprenticeships, Skills, and the Children and Learning Act 2009 (s. 5(b)). In the gangmaster sectors, apprenticeships were applied by Private Training Providers in Confidential Apprenticeship Agreements for example A4e to Staffline, before Staffline purchased A4e and changed its name to Peopleplus (Linford, 2015, April 27), because apprenticeships were applied in the gangmaster sectors to migrant workers on a CFS. In addition, Apprenticeship Training Agencies could supply apprentices without the need of a license into the licensed gangmaster sectors (DEFRA, 2013, August). This information was not shared at the parliamentary inquiry (National Audit Office, 2012, May 16) and the GLA confirmed little risk of apprenticeships to GLAA workers because they withheld their draft GLA Brief X (GLAA, 2012, May 24). Following this, The Public Contracts Regulations 2015 (s. 20, s. 21) made provision for gangmasters as economic providers or training providers to continue their partnership with apprenticeships, by providing access to apprenticeships directly, and these were applied to migrant workers in GLAA sectors working under a CFS who were not employed and did not move into permanent employment for example A4e in Sheffield (GOV.UK, 2012, March 9), and A4e as PeoplePlus part of the Staffline Group (2025).

The Apprenticeship Levy is paid by employers as part of PAYE, and per Employee NIC threshold and is collected p.h. by gangmasters from their clients as per GLAA CRG. Workers on gangmaster food apprenticeships in the food manufacturing and food processing sectors are incorporated together with workers on a CFS/ZHCM as employees in ONS data, with data derived from the LFS which collects data from households (ONS, 2022, November 15).

There is little evidence to suggest workers in food manufacturing and food processing have benefited from public funded apprenticeships because employment rules and regulations have been adapted to fit deregulated legislation in Figures 1.1 and 2.3. Nonetheless, GLAA gangmaster businesses as employers and service providers received incentivised payments to expand the UK flexible workforce via apprenticeships, even though The Public Contracts Regulation 2006 and the Provision of Services Regulation 2009 absorbed into UK legislation from EU Services Directives 2006/123/EU and 2004/54/EC, did not include gangmasters to administer UK procurement contracts, as the GLA Brief X was withheld (GLAA, 2012, May 24).

2.2.12.6 GLAA Licensed Gangmaster: Pension Auto-Enrolment (PAE)

Licensed and unlicensed gangmasters collect hourly PAE costs of 3% of qualifying earnings from their clients charging £0.19 p.h. for aged 21-22 year olds and £0.20 p.h. for aged 23 plus as illustrated in Appendix 2.1 and collected from their FMC as illustrated in Appendix 2.2. Gangmaster businesses collect pension funds for all their workforce in so-called employment for aged 22 plus. Following this, gangmasters can either set up their own workplace pension schemes or because they are employer businesses [as per the EAA1973 (s. 13(1.b), s. 13(2), s. 13(3))], then as gangmasters that can access the UK National Employment Savings Trust (NEST).

It is possible gangmaster workers aged less than aged 21 who earn less than the NIC threshold enable gangmasters to economically benefit directly from PAE collections by not reimbursing the FMC and by gathering pension PAE in total profits. Therefore, deductions are made by gangmasters and not refunded to GLAA workers as per the following:

- A licensed gangmaster does not differentiate the age of the workers on their payroll
- Not deferring payments for three months due to the AWR of three months, or failing the AWR by workers not working the same hours daily/weekly/monthly for three months
- If you earn at least £10,000 per year (p.y.), the workers' statutory pension provision is calculated and spread across all the workers consistently on a weekly payroll as illustrated in GLAA Brief 78 (Appendix 2.1). However, it is impossible to calculate an hourly PAE charge because the workers under a CFS do not have guaranteed hours and in any case, licensed gangmasters cannot confirm daily weekly or monthly numbers of workers via SLAs including the licensed gangmaster total yearly income
- The global precariat (Standing, 2011) and EU workers returning to their home country are unaware they have earned PAE and do not claim it.

The Department for Work and Pensions (DWP) (GOV.UK, 2023, March 3) extended PAE to all gangmaster work by lowering the earning limit and age to 18 plus. So, if HMRC fails to collect all PAE from a licensed gangmaster, then the licensed gangmaster keeps the payments of PAE because the gangmaster may have chosen to collect the "cost of

statutory pension provision across their business" which means from hour one, which in some cases is not necessary if workers have opted out (GLAA, 2025, April). Therefore, it is not clear if payments collected by licensed gangmasters from their FMC on behalf of their workers are all passed to the GLAA worker pension funds. It is possible that should HMRC fail to collect funds correctly, then additional economic gains benefit the licensed gangmaster sectors and their FMC directly because total economic benefits had been calculated into the SLA (HC Deb., 15 March 2023).

The same applies to apprenticeship levies, PAYE, NIC and PAE highlighted in the Precision Prospecting Ltd (2005) report below that examined seasonal work between labour providers and the food supply chain. The following subcategory examines a report by Precision Prospecting Ltd (2005) who won a tender from DEFRA and the Home Office to research the use of labour in agriculture, and the food processing and packing sectors with two phases, including a survey of UK labour providers and users, and a qualitative study of the food chain.

2.2.12.7 Home Office, DEFRA and Precision Prospecting Ltd: Apprenticeship Levies, part of PAYE and NIC for Full Time Workers

Following the enactment of the Gangmasters (Licensing) Act 2004, Precision Prospecting Ltd (2005) won a tender from DEFRA and the Home Office. "The study was designed to both complement the information collected in the annual Agricultural Census and to provide information on those areas, which are not covered by the Census" (Precision Prospecting Ltd, 2005, p. 5). The objectives of the study were threefold:

- To provide information on the number of seasonal and temporary workers engaged in agriculture and the agricultural packhouse sector, and the supply of workers to these businesses
- To identify employment patterns and practices, the origins of seasonal and temporary labour and the extent to which labour moves between different economic sectors, and
- To consider the potential demand for workers under both the Seasonal Agricultural Workers Scheme (SAWS) and Sectors Based Scheme (SBS), and the impact of EU enlargement on the demand for workers under these schemes.

The study collected qualitative and quantitative data from desktop research, survey questionnaires, and telephone interviews with farms using temporary workers, labour

providers, SAWS operators, workers and data from the National Farm Research Unit and DEFRA Census.

Precision Prospecting Ltd (2005) identified Value Added Tax (VAT) and NIC fraud carried out by different types of labour providers, as value chain pressure points led to poor and illegal employment practices by labour providers illustrated in Figure 2.4:

Food retailers and food service	• Buying strategy 'Market minus price – not supplier cost price' • Open book accounting which can be used to apply downward price pressure and a 'take it or leave it' relationship with suppliers
Technical managers and buyers	• Exclude labour costs from planning process with suppliers • Constant change of buyers – in some cases every 5 months with targets and rewards based on bringing down costs
Suppliers/labour users	• Suppliers as 'price takers' with no access to alternative markets. • Downward price pressure leaves no margin for developing good people management skills for direct or outsourced workers • Suppliers look for cheapest source of labour
Legitimate labour providers	• Have expertise in recruitment, managing people and all aspects of employment regulation. Where suppliers pay the full cost of the service charge, labour provider businesses are able to meet all legal requirements. • **Poor practice** occurs where labour providers do not have appropriate business systems in place and have little management training and/or poor access to government agencies
Illegal labour providers Type 1	• Type 1 labour providers understand that low or negative margins drive suppliers to collude with them when they charge below the market rate for labour services. • Type 1 labour providers make their margin by defrauding on VAT payments.
Illegal labour providers Type 2	• Type 2 labour providers find workers willing to collude over non-payment of tax and National Insurance and defraud the Inland Revenue. Workers are willing because of low pay in the sector and see this a way to increase their take-home pay.
Illegal labour providers Type 3	• Type 3 labour providers take the opportunity to defraud VAT and Inland Revenue and abuse vulnerable workers that are dependent on them for work, transport and housing. Labour providers do this because the financial gain is worthwhile compared to the risk of prosecution. Even when the numbers of people involved are small, i.e., being a labour provider of 6 people, profit can be made from VAT fraud and worker abuse. Type 3 labour providers make their margin through fraud and worker abuse.

Figure 2.4. Value chain pressure points leading to poor and illegal employment practices by labour providers (Precision Prospecting Ltd, 2005, p. 95)

The report identifies the "dearth of UK nationals" who had left mining communities to work in agriculture and food processing (Precision Prospecting Ltd, 2005, p. 27). One farm example in horticulture relied on a labour provider/gangmaster who has 'gangers' to organise two types of gangs, one gang made up of ex-miners and the other gang of EU migrants. The labour gangmaster was paid directly who then distributed money between the workers. Workers and miners who left mining communities searching for work, most likely worked 45 hours per week (p.w.), because the Precision report based their example for gangmaster charges on workers working Full Time at 45 hours p.w. Nearly two decades later, miners are joined by UK nationals and GLAA workers in Table 1.1, because they are excluded from the Shropshire (2023) report and excluded from estimated

TFP outputs of the food sector, in preference for open borders (parliamentlive.tv, 2023) and workers as a hidden 'input' to TFP.

Other 'workers' included working holiday makers, British nationals, caravaners, travellers, students, and the then annual requirement of 25,000 SAWS workers. In other areas some UK workers had required UK benefits to top up their wages, which may have caused for the preference of EU so-called compliant, reliable, cheaper migrants who were ideal as a flexible labour workforce provided by gangmasters due to the lack of public transport and EU migrants Right to Work from the 1st of May 2004. This type of worker was required to enable the survival of gangmasters that would be supervised by "a small number of more experienced and skilled accession nationals as team leaders or junior managers" (Precision Prospecting Ltd, 2005, p. 44). A preference for EU migrants and the precariat has continued into the twentieth century (Wilkinson, 2012) and is the preferred choice of service sectors in the GLAA remit today.

The report provides estimated worker numbers for Spring 2004 totalling 300,000 to 450,00 supplied yearly by gangmasters with an additional 20,000 to 160,000 onto farms.

The total number of temporary workers for Spring 2004 into the UK via gangmasters onto farms, in agriculture, horticulture and co-located food processing totalled an estimated range of 420,000 to 611,000, excluding the SAWS quota for 2004 of 25,000 students with the "blame for poor employment practices is attributed to the illegal labour providers, and lack of law enforcement" (Precision Prospecting Ltd, 2005, p. 93).

Based on horticulture and agriculture workers two decades ago, the report provides an illustration of typical unavoidable costs incurred by gangmasters. By "observing the law on basic employment matters such as the minimum wage, national insurance, employers' liability insurance, and maintaining and insuring roadworthy vehicles" (Precision Prospecting Ltd, 2005, p. 108), the report provides an example of:

- Costs for a supplied workforce of an average of 50 Workers [GLAAC3]
- Based on all Workers as Temporary Workers [GLAAC3]
- Based on all Workers working Full-Time at 45 hours p.w. [GLAAC3]
- Workers receiving employment benefits including sick pay, holiday pay and breaks in the workplace.

A 30% charge by gangmasters to their FMCs in agriculture is illustrated as a guidance on top of the NMW for Full-Time workers (Precision Prospecting Ltd, 2005, p. 110).

The ALP and other gangmaster trade associations, recruitment agencies, businesses and licensed and unlicensed gangmasters have taken advantage of this example illustration of a charge for Full Time workers that is now adopted and placed into GLAA policy. Charge Rate Guidance is provided by the ALP, shared later by the REC in Table 4.26, and the ALP and GLAA in response emails in subcategories 4.1.4.1 and 4.1.4.2. This has enabled all gangmaster sectors to continue the slightly distorted statistics noted in 2003, to hide and enable gigantic distortions to the present day, thereby expanding EU migrants in the remit of the GLAA into service sectors where peripheral workers on a CFS with no guaranteed hours are not counted correctly. Payments or deductions from GLAA workers weekly wages have not been checked properly by HMRC and the GLAA for nearly two decades. GLAA workers are unlikely to earn a full weekly wage, or a Real Living Wage (RLW) as described by the Living Wage Foundation (2024), because they work from a CFS with no guaranteed hours, with few employment rights and deregulatory legislation in free market liberalism.

Parker, Arrowsmith, Fells and Prowse (2016) provide an insight of European, Australian and UK living wages for a Labour and Industry Journal. Journal papers build on historical living wages "practical and political considerations" (Parker et al., 2016, p. 5) including employee representation, the definition of what a living wage is and the effects of a living wage on employers and workers. Themes recognise links between trade unions and community groups (Prowse, Lopes and Fells, 2017) that pinpoint workers in deregulated low skilled service sectors. The NLW is articulated differently on whether the country is developed or not, with Western Europe identified with established reduced working hours. The benefits of maintaining engagement (Prowse et al., 2017) highlight the need for strategic engagement at executive level in the private sector. Prowse et al. (2017) suggest benefits for unions engaging with organic community activism in food manufacturing, food processing, horticulture and agriculture (Dobbins and Prowse, 2021), which thus suggests benefits via union support for GLAA registered workers as the precariat alongside the existing proletariat (Standing, 2011).

Licensed and unlicensed gangmasters charge a labour rate of 30% on top of the NLW/NMW in evidence from Precision Prospecting Ltd (2005). The evidence found workers working full time hours in horticulture and agriculture of 45 hours p.w. with full benefits of holiday pay, sick pay, and breaks (Precision Prospecting Ltd, 2005, p. 110). The ALP has taken this example of real full time employment and then copied this subsequent information into GLAA CRG illustrated in Appendix 2.1:

> Defra analysis conducted in 2003 estimated labour provider overhead costs as 30% on top of the NMW. In reaching this figure Defra state that the result is not intended to be a realistic description of the costs of any particular labour provider business (e.g. it makes no attempt to allow for the costs of rent/interest charges on office accommodation, which may vary widely from one business to another). It also states that this figure is likely to understate the actual costs for almost all businesses as well as making no allowance for management costs or profit. Rather this is intended to be an illustration of the minimum unavoidable costs that flow from observing the law on basic employment matters such as the minimum wage, national insurance, employers' liability insurance, and maintaining and insuring roadworthy vehicles (GLAA, 2022, April, p. 2).

Applying the term "the DEFRA analysis 2003" is not correct for a number of reasons. Firstly, the Labour Governments response to the Gangmaster Fourteenth Report Session 2002-03 (www.parliament.uk, 2003, September 18) invited tenders to "research the use of seasonal and casual labour in agriculture and related food processing and packaging sectors" whereby Precision Prospecting Ltd (2005, p. 4) were awarded the contract on behalf of DEFRA, the Agriculture Wages Board [which was later repealed and abolished] (GLA, 2011, April 13) and Work Permits Ltd. Secondly, Precision Prospecting Ltd (2005) carried out their research in 2004 and reported in 2005, which included for example the "30% charge by gangmasters to their food clients in agriculture is illustrated as a guidance on top of the NMW for full-time workers" (Precision Prospecting Ltd, 2005, p. 110). Finally, the ALP have applied intentionally misleading terms to GLAA CRG for the gangmaster sector that does not correctly represent DEFRA, the Home Office or the Labour Government in 2003.

As the GLA was set up, Precision Prospecting Ltd (2005) highlighted Type 3 Illegal Labour Providers with illegalities of deductions for full time employees. It is Type 3 Illegal Labour Providers highlighted by Precision Prospecting Ltd (2005) that have been legalised because their illegalities of deductions continued and have been expanded into other sectors. In any case, as GLA workers became GLAA workers, they remained in non-standard employment on a CFS with no guaranteed hours as numbers of these workers were expanded, and then GLAA workers became legalised as neoliberalism took grip to create a flexible workforce with no guaranteed hours. These actions have directly contributed to UK citizens suffering in the Cost of Living crisis in Yorkshire and the Humber and predominantly in the North of the UK, because GLAA workers are not

counted correctly at the ONS which directly affects the Barnett Formula, whereby lower funds are applied to Yorkshire and the Humber and predominantly the North of the UK (UK Parliament, 2023, March 6).

Twenty years later, the Precision Prospecting report can be compared with the DEFRA delegated independent review into labour shortages in the food supply chain. The following subcategory introduces the Shropshire (2023) review that is supported by the DEFRA secretariat, but led by an expert panel including the former CEO of Gs Fresh and member of the Modern Slavery Intelligence Network, a non-executive director at Marks and Spencer, representation from the Lego Group, and Kerry Group, a Technical and Sustainability Director at Greencore UK, Chairman of the Western Fish Producers Organisation and Trustee of The Fishermen's Mission, a food entrepreneur and organic farmer, a former Vice-Chancellor from the Harper Adams University and founding member of the Skills Development Board which helped create The Institute for Agriculture and Horticulture (TIAH), and a Group Technical Director from the 2 Sisters Food Group (Shropshire, 2023, p. 8).

2.2.13 DEFRA: Shropshire Independent Review of Labour Shortages in the Food Supply Chain

The Shropshire (2023) independent review evaluated the food supply chain workforce in England. The review identified four themes including the lack of automation, recruitment and retention, with a lack of skills behind their inability to access labour from the EU. Statistical secondary data was taken from the ONS, the GLAA and DEFRA quoting 4.1 million people were employed in the agri-food supply chain in the first quarter of 2022. Qualitative interviews were held with agri-food businesses, roundtable discussions and site visits with stakeholders from large businesses and trade associations that provide expert advice to the GLAA, with an analysis of academic and government reports including the House of Commons and the Cabinet Office. The Shropshire (2023) report is limited to farming, arable and edible horticulture, primary processing and food and drink manufacturing. The report incorrectly applies regular terms of workers as employees and separates employees as seasonal workers, agency workers and migrant labour noting the "high 'churn' of staff" in the food sector (Shropshire, 2023, p. 54).

Furthermore, some employers are gangmasters and businesses, but the report excludes some sectors in food manufacturing and food processing including short shelf food manufacturing and pet food. The report provides ten recommendations including

implementing a comprehensive strategy to enhance sector attractiveness, with access to workers, investment in the domestic workforce, reforming the apprenticeship levy, building on skills and supporting a food career curriculum, producing a workforce strategy, and incentivising and advancing automation, knowledge and technology from innovation.

Shropshire (2023) refers to mobility schemes including the Australian mobility scheme with recruitment caps for employers, and the United States (U.S.) scheme with no caps on recruited numbers of illegal migrant workers. Four UK leading meat processing organisations pay £3 million to recruit 200-300 workers via the UK skilled visa route. The follow-up parliament inquiry (parliamentlive.tv, 2022) of the impact of the NIP on the RoI and the Northern Ireland Statistics and Research Agency (NISRA), confirmed numbers of workers, their employment status and type of contracts that were not collected from the private sector including the gangmaster sectors in manufacturing in NI. This is the same for all devolved nations including England, Scotland, and Wales (parliamentlive.tv, 2022). In addition, TFP is used to measure productivity by DEFRA, but Shropshire (2023) excludes short shelf food manufacturing, pet food and workers in the GLAA remit from the estimated calculations of TFP of outputs of the food sector, as the Shropshire (2023) report seeks open borders for workers as a hidden 'input' to TFP. Shropshire (2023) recommends Local Enterprise Partnerships (LEPs), and discusses the use of temporary agency workers, reporting 50% of the workforce on one site were agency workers and the benefits of meat processing companies' recruiting from abroad notedly with a newly licensed gangmaster.

The Shropshire (2023) report applies the language of political discourse because it does not mention open horticulture routes identified earlier by the Chief Inspector of Borders and Immigration in the HO Outcome Delivery Plan 3 (parliamentlive.tv, 2023). Nonetheless, concerns were raised that UK labour for horticulture was unsuccessful, however government recommendations include mechanisation with visas and training that is vital for the UK food supply chain for the future (GOV.UK, 2023, June 30).

The GLAA requires international labour providers outside the UK either supplying workers directly to gangmasters or directly to UK clients to provide services on a CFS (GLAA, 2024c). However, some UK legislation is not recognised in law, some legislation has not been replicated, and some is changed without parliamentary scrutiny for example TUPE, the Red Tape Challenge, GLAA licensing standards, VAIs and sole

operators. The HO provides open unobserved routes including via the NI CTA that provides free movement for workers supplemented by a limited number of LAPOs with deregulated powers, enabling global gangmasters to take advantage of loopholes in the UK system including worker travel information recorded as commercially sensitive by DEFRA and the HO, with the NIP providing the ability for worker numbers to not be collected in NI, which is the same as England, Scotland and Wales (parliamentlive.tv, 2022).

As the GLA was set up, Precision Prospecting Ltd (2005) highlighted Type 3 Illegal Labour Providers with illegalities of deductions for full time employees. From 2003, it is the Type 3 Illegal Labour Providers highlighted by Precision Prospecting Ltd (2005) that have been legalised by economic capitalists including gangmaster trade associations and stakeholders, but it is a shortage of workers that Shropshire chooses to investigate and not the actions of the licensed gangmaster sector in deregulated free market liberalism. This is because there has been an escalation of additional problems, illegalities of deductions have continued, supplemented by payments and others as per Figure 2.3, the UK has an unskilled workforce, GLAA registered worker data is collected (Table 4.28) but is not given to the ONS, with intentionally misleading terms applied to GLAA CRG by the ALP.

2.2.14 Employment Rights and Labour Exploitation of the Precariat

Barnard and Ludlow (2016) use a socio-legal approach to question the employment rights of EU-8 migrant workers "that could be better protected in practice" (p. 27). The 2013 introduction of applicant fees to apply for an Employment Tribunal ended in 2017 following the Supreme Court's decision whereby fees for ET claims were unlawful in Unison (Appellant) v Lord Chancellor (Respondent) Case ID UKSC/2015/0233. Barnard et al. (2018) use legal theory to build on this work, their enforcement of employment rights and the under-use of EU-8 migrant workers use of ETs because it is not clear how EU-8 migrants enforce their rights. They investigate why workers that move around to avoid abusive working conditions do not access or wish to enforce the worker protections available to them. The abilities of the GLAA to enforce compliance are confirmed through the perspectives of their stakeholders. Barnard and Ludlow (2016) highlighted evidence to suggest that BIS on referral of Witkowski (plaintiff) v Drivers4you (Defendant) Case ID 1950959/2010 chose not to act against the respondent as a quasi-employment agency under the EAA1973. This may be because the employment agency

did not employ but instead applied the EAA1973 (s. 13) in the UK, providing an ability to protect gangmasters as employer businesses with their unobserved provision of people as goods for services.

With "social practical and legal obstacles" (Barnard et al., 2018, p. 258) within a tribunal system (Strauss, 2009) set up in such a way as not to assist workers illustrated in Table 1.1, workers are discouraged from accessing ETs who upon questioning their rights, may mean they would not receive continued work. With job insecurity as a form of control monitored and held by their gangmasters, workers would feel criminalised by the system, but they have little choice because they have no representation and no voice and no knowledge of the system (Fitzgerald and Smoczynski, 2021). The GLAA website mentions the right for the worker to join unions, but this is hard for both unions and workers because unions are challenged by zero hours part time agency work, migrant workers that move swiftly from place to place, and gangmaster avoidance strategies whereby the worker could lose their job should they join a union, because GLAA workers are commodities provided to FMCs by their licensed gangmaster in a CFSM (Figure 2.3) whereby hours are not guaranteed.

Barnard et al. (2018) explore the differences between employment agencies in the remit of the EASI, licensed gangmasters at the GLA and include the Health and Safety Executive (HSE) role to Working Time and enforcement, even though a merger between the GLA and HSE had failed to proceed (GLA, 2006, March 15). Barnard and Butlin (2018) examine WTR which are published in tribunal data and interview staff from government bodies, the GLAA, three licensed gangmasters and EU-8 workers [GLAAC2] and [GLAAC3]. Their data would suggest workers in the concept of the precariat (Standing, 2011) with "imported experiences, beliefs and ambitions" (Barnard and Butlin, 2018, p. 260) do conflict with UK regulatory protections. By analysing GLA data, they indicate an increase in prosecutions, but a significant reduction in the revocation of licenses (Barnard and Butlin, 2018). Furthermore, emphasizing that when the GLA became the GLAA and moved to the HO in 2017 [although it had moved to the HO in 2014], the GLAA was required to move its emphasis towards "identifying the most severe extremes of worker exploitation including trafficking of vulnerable people" (Barnard et al., 2018, p. 253). Barnard et al. (2018) make a clear distinction between EU-8 migrant workers [GLAAC1] with vulnerabilities from their own work experiences, that may be having an impact on workers in the concept of the precariat (Standing, 2011) and their own access to an ET.

Barnard and Ludlow (2016) and Barnard et al. (2018) do not make a distinction between overseas gangmasters and licensed gangmasters as recruitment agencies, employment businesses, employment agencies, managed service providers, operators or labour providers because this was not part of their study and does not form part of their database. Recommending simple reforms to the ET system and increasing civil and criminal penalties with the suggestion of an Ombudsman to assist with labour rights for workers, would provide some help to GLAA workers as part of UK administrative law that scrutinizes executive powers as a mechanism to protect GLAA workers.

Barnard and Butlin (2020b) continue exploring the UK's rule of law and EU migrant workers access to courts and how "tools established under the EU" Directive 2014/54 should be put in motion. Recital 5 of the Preamble to the EU Directive 2014/54 states "union workers may still suffer from unjustified restrictions … discrimination on grounds of nationality and exploitation when they move to another Member State. There is, therefore, a gap between the law and its application in practice that needs to be addressed" (Barnard and Butlin, 2020b, p. 1625).

Precarious workers may be viewed by unions as "unorganizable" (Hill, 2008), but they were expected to manage their work problems, both before and after the EU referendum (Fitzgerald and Smoczynski, 2021; Tuckman and Whittall, 2002) because the GLAA (2022b) identify the vast majority of their victims through "compliance and enforcement activities" (GLAA, 2022b, p. 6). As the researcher explores the work of Barnard and Butlin (2020a) in the context of free movement of labour, Barnard and Butlin (2020b) continue to uphold their view that it is the reluctance of EU-8 migrant workers to make use of UK law to emphasise their rights and that EU-8 migrant workers choose not to use an ET. This contrasts with the Department for Business, Innovation and Skills (BIS) (2011, May, p. 46), now removed from observation, that indicates workers must make an ET claim regarding AWR within three months, although this should indicate three months less one day.

Following the Brexit referendum, Walsh et al. (2022) research new areas for investigation and the risks of labour exploitation, the impact of the coronavirus pandemic on recruiting labour and provided solutions to the challenges of the new UK points-based skilled worker route as part of the new UK immigration system. Semi-structured interviews were carried out by Walsh et al. (2022) with senior industry representatives including 36 in the agri-food sector and seven in the construction sector, with 46.5% licensed or unlicensed

gangmasters and 53.6% service sectors, with 100% of senior industry representatives identifying a labour shortage, including the gangmaster sector who did not have any idea of the number of workers any service sectors would require. Walsh et al. (2022) did not report about how businesses in the UK recruited and balanced the employment of British workers with the need of employment of workers in the concept of the precariat (Standing, 2011) from outside the UK. Walsh et al. (2022) failed to explore some legislation in any gangmaster CFS Models which could have been explored, because participants stated the UK had lost its competitive advantage as profits were squeezed as business overheads were increased.

Walsh et al. (2022) identify The Agri-food Industry supply chain (p. 4) indicating there is a higher risk of part time workers in "modern slavery and labor exploitation at the top Tier 1" (p. 7) that identifies skills gaps. Skills gaps in agri-food should not be hard to find as public funds have been allocated to the licensed and unlicensed gangmaster sectors over the last decade. The same workers in Tier 1 are most likely working from a CFS, that enables the gangmaster to move the worker around different supply chains directly and via their own transport at different tiers of other service sector supply chains as transport responsibility became that of the unscrupulous labour contractor (Anderson and Rogaly, 2005; Rogaly, 2008; Tuckman, 2010; Barrientos, 2013). By taking the research further, this will be explored in the primary data to add to debates to raise awareness of the plight of workers in the concept of the precariat (Standing, 2011) in the GLAA food manufacturing and food processing sectors.

The Walsh et al. (2022) report examines stakeholder and gangmaster industry responses to the inaccessible supply of workers following Brexit in the UK. Walsh et al. (2022) discuss the identity and diversity of worker definitions the researcher illustrated in Table 1.1, and further examine elusive numbers of workers as a "concealed nature of the crime, compounded (particularly in the case of workers in the agri-food and construction industries) by the itinerant and seasonally transient nature of the work" (Walsh et al., 2022, p. 2). This is important, because the GLAA collects registered worker numbers and they did so before the referendum and following Brexit (Table 4.28), therefore it should be easy to calculate how many workers are required in advance for different GLAA sectors, thereby avoiding elusive numbers.

2.2.15 Regulatory Theory and the GLAA

Mustchin and Lucio (2020) explore how the provision of UK regulations for a precarious supply of labour are devolved and diffused to a number of different agencies including the EASI, HSE, HMRC and the UKBA, the police and the GLAA.

Lucio and Mackenzie (2017) reveal precarity in organisational structures and debates in which the GLAA has been overlooked. Mustchin and Lucio (2020) question contradictory innovative and deliberately chosen enforcement methods of compliance approaches with limited scope and argue the governments deregulatory agenda has enabled a looser control of regulation by different agencies that include the EASI i.e. shortages of statistics to inspect, HMRC, HSE, UKBA, the police and the GLAA. Their argument provides a focus on the internal and external dimensions of labour inspection by the UK government. Their interventionist approach explores the organisational tensions between three agencies; HMRC, the GLAA and the EASI as they receive coordination from a politically nominated DLME, however the HSE is excluded from the DLME coordination's and therefore the HSE would have no understandings or involvement of any coordinated policies. Further investigative approaches explore how the changes in labour inspection have affected civil society and workers. Their findings outline the effects of austerity and the state control logic of alliances between different agencies with differing enforcement styles that explain deregulated enforcement regimes that fail to protect the fragmented labour force. The next paragraph will explain how the study will advance this field of research.

This study will investigate the emergence of precarious working in GLAA licensed sectors. This research will explore how the UKs leading investigative body the GLAA has arguably failed workers they were entrusted to support, how non-compliance by gangmasters is standard practice (Ioannou and Dukes, 2021; Mustchin and Lucio, 2020), and how financialisation (Clark, 2016) and weaknesses including non-government monitoring of standards with little or no enforcement in the UK labour supply chains and the reluctance of the government to challenge gangmasters, has allowed industry to exploit GLAA workers. The GLAA is regulatory but this establishment in terms of policy has boosted precarious working and labour market flexibility in the UK, with the GLAA secretariat and government that have directly encouraged and underpinned a movement towards precarious working in the UK with labour contracting as "the Achilles Heel of

corporate codes" (Barrientos, 2008, p. 983) by the economic exploitation of migrating EU workers.

2.3 GLAA Worker Employment Status

Prior to the general election in 2010, different GLA workers had a clear employment status. However, following the 2010 general election, GLA worker employment status seems to have changed. Just prior to the 2010 general election, stakeholders including the REC and ALP had lobbied government to change worker status, but they had failed to do so.

2.3.1 GLA: Worker Employment Status before May 2010

The GLA position of checking the employment status of who was a worker, was in the Gangmasters (Licensing) Act 2004 (s. 26) and explained in the GLA 26/8.4 GLA Position on Checking Employment Status (GLA, 2010, April, 21a):

- Some standards apply to all individuals regardless of employment status, by virtue of the definition of "worker" contained in s.26 of the Act
- Some standards apply only to employees in Wales and England in 2012 (e.g., the right to the Agricultural Minimum Wage, by reference to the Agricultural Wages Order)
- Some standards apply only to those individuals who are a 'worker' or an employee (GLA, 2010, April 21a, p. 2), for example the right to the NMW, holiday pay, maternity pay, SSP and the AWR. Those employed also include agriculture workers who should be paid even if bad weather stops work, they should receive night-work pay, on call allowances and rest breaks (GOV.UK, 2025a).

Employment relationships between the gangmaster and workers are examined during the GLA inspection process "to identify whether a person is genuinely "self-employed", a "worker" or an "employee" (GLA, 2010, April 21a, p. 3). The GLA application of checking employment status shows the difference between an employed agriculture worker [GLAAC3], an agriculture worker [GLAAC3] working from a CFS and a self-employed agriculture worker [GLAAC3] (GLA, 2010, April 21a). GLA advice had been sought from BIS and HMRC who confirmed agriculture workers should be asked a series of questions in relation to their working arrangements because there are clear differences between agriculture workers employed on a CoE or working from a CFS/ZHC, and the

self-employed agriculture workers who are responsible for reporting their own income for tax purposes to HMRC.

However, the "REC considered the GLA were operating outside of its remit, and that they disagreed with the principles" (GLA, 2010, March 3, p. 3) and the government who had created clear distinctions which were different to gangmaster behaviours, because that would mean different jobs would have their own clear different employment status, employment rights and status for tax purposes. The Trades Union Congress (TUC) argued "that you do not just look at the contract, you look at the employment relationship" (GLA, 2010, March 3, p. 3). The REC as a board member attended and provided direction at both GLA board, liaison and government meetings. In 2025, the TUC (Livingston, 2025, February 22) called for an investigation into the UK Seasonal Worker Scheme of 45,000 workers because evidence indicates seasonal workers were not paid correctly.

2.3.2 GLA: Worker Employment Status after May 2010

In May 2010, the Conservative and Liberal Democrat parties formed a Coalition Government. Any GLA meetings that may have been held in May and June are not available for scrutiny and have been removed from observation online.

The GLA Board liaison group meeting (GLA, 2011, April 13, p. 5) discussed new GLA Briefs on Managed Services, Employment Status, Time to Pay arrangements, Overseas Guidance and Travel and Subsistence Schemes with agriculture workers [GLAAC3] and agriculture drivers [GLAAC4] employment status. Nonetheless, GLA Worker Representatives were informed BIS would hold an Employment Review, a Farming task force review with a new Quinquennial (GLA, 2011, April 13).

In 2011, representation for workers was provided by unions including the TUC, General Municipal Boilermakers Union/General Union (GMB), Unite and Union of Shop, Distributive and Allied Workers (USDAW), with community groups including the Federation of Poles, Good Relations and the Migrants Rights Network. Information in Appendix 2.3 has been collated together from GLA and GLAA board meetings that provides attendees to board meetings held with the GLAA secretariat between 2006-2024 including board members, executives, stakeholders and observers. The AWB was being repealed in England and Wales but not Scotland. Nonetheless the ALP actively pressed for the AWB to be abolished in England and Wales by October 2012, although the ALP could not "understand why it will be as late as October 2012 they are pressing for it to be

abolished by October 2011" (p. 5) with the AWB to be finally abolished by the 25th of June 2013, which aligns with the commencement of the AWR (GLA, 2011, April 13).

There is evidence to confirm stakeholder Labour User Labour Provider meetings continued until 2020 because minutes of these meetings can be located on the GLAA website (GLAA, 2025f), but there is no evidence to suggest Labour User Labour Provider meetings and Worker Representative meetings continued after 2020 because those minutes are not available on the GLAA website. In addition, GLA Brief 4: How licensing applies to machinery rings, GLA Brief 10: How licensing applies to shellfish, GLA Brief 24: How licensing applies to the poultry industry, GLA Brief 25: How licensing applies to veterinary practices, GLA Brief 31: Forestry exclusion from licensing and GLA Brief 32: Exclusions from licensing, were replaced with licensing guidance for gangmasters operating in GLAA sectors (GLAA, 2019, April).

GLA Brief 18 (2012, January) tests the employment status of workers to identify whether a person is genuinely "self-employed", a "worker" or an "employee" (GLA, 2012, January, p. 1). The GLA checks the agreement the worker has signed which includes checking the wording on the contract signed by the worker. A CFS would not provide hours and guaranteed work. A CoE would provide guaranteed hours, guaranteed work and full employment rights including SSP, maternity pay and leave, statutory paternity pay and leave, protection against unfair dismissal and statutory redundancy pay. GLA Brief 18 (2012, January) also does not define the difference between a CFS and a CoE.

GLA/GLAA guidance was supported by an Employment Status Review carried out by the Office of Tax Simplification (OTS) (Jack and Whiting, 2014, July 11a; Jack and Whiting, 2014, July 11b) who sought "quick wins" for government budgets, by examining Employed and Self-Employed Status. The OTS maintained their "on-going project on PAYE/NIC operational integration" with meetings attended by stakeholders including two gangmaster trade associations, the REC and the Independent Professionals and the Self-Employed and PricewaterhouseCoopers (Office of Tax Simplification, 2015, March). With support from stakeholders, the OTS describe a CFS as a commercial contract for the services of a self-employed individual. This is not clear, because although some gangmaster workers can be classed as self-employed workers, a CFS is a ZHC between an employer and their workers as per the EAA1973. Following meetings held at the OTS, the OTS incorrectly concluded that workers were employed on a CFS and integrated on the payroll with full PAYE and NIC. In free market liberalism, the OTS failed to consider

the language of the EAA1973 and GLAA CRG as they expand their gangmaster PAYE/NIC project, putting commercial ventures of the gangmaster industries before workers, alongside the implementation of the Modern Slavery Act 2015 as workers are purchased in modern day slavery as goods for services.

The REC recommend their Terms of Engagement as a CFS for PAYE Agency Workers (REC, 2022, November) for the temporary recruitment of workers for an SLA with an employment business, even though the employment business is not employing the workers.

2.3.3 Check Employment Status Tool (CEST)

GLAA registered workers provide labour market flexibility in the GLAA remit, they have no clear employment status and may fail to access the UK governments Check Employment Status Tool (CEST) (GOV.UK, 2021, May 4; TUC, 2019, June 28) leaving the workers employment status complicated. This is because a CFS is not made clear on the CEST tool in different languages for all workers. The Taylor Review of Modern Working Practices (Taylor et al., 2017, p. 75) provides some information similar to that of government departments because the report separates agency workers from workers on a ZHC and accepts any form of a work contract as a CoE, as they discuss the CEST tool and recommend a New Enterprise Allowance (NEA) scheme, showing support via subsidies for enterprise partnerships with the gangmaster sectors for gangmaster employees, but thereby showing a complete lack of understanding of GLAA registered workers on a CFS. The Taylor Review (2017) received some evidence from the TUC (2017) which focused on issues of worker rights, employment status and the need for a more robust and fair labour market. The TUC (2017) response emphasised the importance of ensuring all workers, including those in non-standard employment arrangements, have access to basic rights and protections. The TUC advocated for greater clarity and transparency in employment relationships, improved enforcement of existing laws, and measures to address the power imbalance between employers and workers (TUC, 2017).

Gangmaster trade associations again failed to share some information for example the EAA1973 s.13 and the application of legislation in the gangmaster sectors illustrated in Figure 2.3 as the Taylor Review (2017) was guided around deregulated legislation thus ensuring an increase in capital flows from the precariat. GLAA registered workers are seasonal workers and they are workers in the food manufacturing and food processing

sectors working from a CFS which is a ZHC. These workers are the precariat who go where the work is (Standing, 2011), because gangmasters are also able to opt-out of The Conduct of Employment Agencies and Employment Businesses Regulations 2003 and in any case, regulations imply that GLAA registered workers on a CFS are also under the control of the end-client (Tarrant, 2018, January 25).

2.3.4 Office for National Statistics (ONS)

Unknown and unlimited numbers of workers are illustrated in Figure 2.2. Following Brexit, some workers stayed in the UK and some returned to the EU. Workers that stayed and now categorised with either 'Settled Status' or 'Pre-Settled Status' via the EU Settlement Scheme are working in GLAA sectors. Their new status means they can legally work and can be located in agriculture and the food manufacturing and food processing sectors.

The Office for National Statistics (2007, December 14) exhibits UK industrial classifications as revised EU industrial classification systems that became effective from January 2008. Nearly two decades later, neoliberalism as the dominant discourse has ensured the Home Office provides a continuous lack of visibility of GLAA registered workers via the Cascot Occupation Classification Tool Classification Structure - SOC 2020 6 digit (v10) (s. 8(81), s. 8(82) (GOV.UK, 2024, July 10).

2.3.4.1 GLAA Workers [GLAAC3] under a CFS

The ONS sends business surveys to all businesses and organisations, who estimate their employees that are employed directly by the business. This should not include workers illustrated in Table 1.1 and Figure 2.2 because they are not employees.

Even though the EAA1973 confirms workers as employed on a CFS, gangmaster businesses do not employ their workers, therefore they should not be included in any 'employee' data (GLAA, 2020, October 22, p. 1; GLAA, 2021, March 19; ONS, 2025, July 17).

Realistically, a FMC may employ 1000 people on a CoE, but an SLA with a gangmaster business may supply workers totalling for example 10,000 on their production lines in different factories, which is a far higher number than data provided by the GLAA in Table 4.28. For example, approximately 460 workers were supplied by each gangmaster per day (p.d.) in 2022 (GLAA, 2022a, p. 9; GLAA, 2022b, p. 9) and 650 workers were supplied by each gangmaster p.d. two years later (GLAA, 2024b). These people are not their employees and do not receive the same benefits as their 1000 employees. In

addition, UK standards were not increased to those of the ILO who recommend one Labour Inspector per 10,000 workers. This enables licensed gangmasters to manage themselves with legislation including the WTR/WTD and AWR illustrated in Figure 2.3, for licensed gangmasters to not provide worker data to government bodies, without any provisions for government bodies including the UK Border Force with any ability to enter a factory to check if UK legislation is correctly applied.

The following section examines private 'employment' service sector providers that include licensed gangmasters in GLAA sectors, because the UK government has a responsibility to monitor the issue of government service contracts that recruit and transport workers from poorer countries.

2.3.4.2 Private 'Employment' Service Sector Providers

Kessler and Alexander (2004, October) addressed the G-24 Project at the United Nations focussing on essential services of water and electricity that must be accessible and universally affordable by private service providers, which includes private employment service sector providers as gangmasters or operators in GLAA sectors for example agriculture. This includes the GLAA because free market liberalism with unobserved loopholes in UK legislation provides open borders for private employment service sector licensed gangmasters to transport workers from poorer countries in the SWVR. Kessler and Alexander (2004, October) challenge four areas of private provision arguing private providers [gangmasters/operators] should be subject to a threshold requirement to enable the improvement of social equity and poverty reduction.

Exploring the provision of essential services in the private sector, Kessler and Alexander (2004, October) make the distinction between service contracts and management contracts. This is significant because the 'privatisation paradox' describes how governments have the responsibility to monitor government funded private services for example the licensed gangmaster SWVR, so that poorly performing services provided to the G-24 do not focus on "lucrative parts of the population" (Kessler and Alexander, 2004, October, p. 2). Kessler and Alexander (2004, October) argue the state as taking the lead in monitoring and regulating private providers, which in the UK includes GLAA gangmaster businesses as economic providers or operators and as, or with their prime providers as LEPs. Service providers include GLAA licensed and unlicensed gangmasters that are Private 'Employment' Service Sector Providers with government service contracts that recruit and transport workers from poorer countries in the SWVR

managed by DEFRA and the Home Office, with seasonal worker numbers illustrated in Table 2.2.

Although gangmasters are sector specific providers, they are not providing workers under any form of 'Necessity' under any Free Trading Agreement in world trade with 'Most Favoured Nation' clauses, for example the UK-EU Trade and Cooperation Agreement (TCA) between the European Union and the European Atomic Energy Community, of the one part, and the United Kingdom of Great Britain and Northern Ireland, of the other part. Although gangmasters are able to control and manage their seasonal workers, they do not own but purchase their commodity as goods for services. GLAA data positions GLAA registered workers as workers on a CoE, but GLAA registered workers work from a CFS which is a ZHC and are then absorbed as employees in ONS data (ONS, 2025, July 17).

Koop and Kessler (2019) highlight the failings of weak regulatory practise in advanced economies by weak governments, government choices and failings where regulatory capacity and competencies were not installed. Kessler and Alexander (2004, October) draw attention to the arrival of government regulatory bodies, which includes the GLAA who approve, license and inspect gangmasters inside and outside of the UK. The HO led GLAA regulates private providers as gangmasters and in turn, the GLAA as an arm's length regulatory body has control over the way financial information is provided to governments. Gangmaster trade associations such as APSCo United Kingdom (2025), the REC and ALP and their members are known as economic operators or licensed and unlicensed gangmaster businesses that are now very powerful. Their use and knowledge of a CFS via the EAA1973 is not shared, whereby the GLAA and gangmaster trade associations have control over what information is provided to the ONS and thus policy makers, the public and globally.

The EAA1973 complimented by deregulated legislation, has played a key role with the expansion of workers in the GLAA remit and their so-called employment status as neoliberalism has provided conditions for a non-unionised shop floor to be created. It is therefore possible that some political parties can make political gains, and other parties may lose by the expansion of GLAA workers in a flexible workforce whereby ballots require a 50% turnout of the workforce, as a requirement as per The Trade Union Act 2016 s.2.

Many GLAA workers are seasonal workers who are migrant workers, who are unlikely to join a union because their gangmaster could stop their provision of work by not

providing hours via their CFS Model. Additionally, although GLAA workers receive pay parity via the AWR, workers on a CFS in the GLAA remit do not have any fixed or arranged hours p.w., there may be no hours one week, six hours the following week, they may work a 12 hour 4/5/6 day working week, it is not a part time or full time job as there are no fixed hours, they are not employed, with GLAA registered workers not guaranteed any work at any time, many with NRPF. Although GLAA seasonal worker numbers are not included in ONS employee data because they are short term temporary workers on short term visas, this is in direct contrast to government reports of a flexible and dynamic labour market, whereby there are now more employees on the payroll than ever before reported by The Chartered Institute of Payroll Professionals (2022).

By mid-2022, the ONS and their Secure Research Service began to scrutinise several issues that could be affecting ONS statistics including the small ZHC estimates taken from their LFS which seeks numbers of people on a ZHC under the term employment, which is an incorrect term and is misleading and refers only to GLAA agriculture and horticulture sectors. ONS and Secure Research Service scrutiny does not include the labour market and the sellers of labour as gangmasters who offer their goods as workers for services in ONS services data.

Estimates of people employed on a ZHC in non-standard employment were reviewed. In a letter to the government, the National Statistician and CE of the UK Statistics Authority (Diamond, 2022, June 30) confirmed numbers of people on a ZHC totalled "1,018,000 (3.1% of all those in employment in the UK)" with 79,000 in Yorkshire and The Humber taken from samples from the LFS with ZHC estimates provided in the ONS dataset EMP17. These figures are estimated data and do not include GLAA registered workers on a CFS and in any case, DEFRA and the GLAA have not provided any data of GLAA registered workers on a CFS which is a ZHC to the ONS. Although seasonal agriculture visa data in Table 2.2 is useful, GLAA worker data in food manufacturing and food processing is not available.

The ONS National Statistician in response, had reviewed the closest classification to Farming that was in "Agriculture, Forestry and Fishing", but the National Statistician was not able to provide numbers of vacancies "owing to the disproportionate costs involved as the industry mainly consists of very small businesses with few vacancies." Based on estimates taken from samples of employees or as the self-employed collected by the LFS, the ONS estimated "329,000 jobs within the Agriculture, Forestry and Fishing industry" (ONS, 2025, May 13). These figures are in stark contrast to data provided by DEFRA to

the UK government (GOV.UK, 2023, November 3) whereby DEFRA combines its own accounts with ONS Annual Business Survey and Regional GVA data, asserting Agriculture and Food and Drink employed less than one million people with Agriculture employing approximately 428,000 people and Food and Drink employing approximately 419,000 people (GOV.UK, 2023, November 3). Adding to this further, DEFRA has excluded the Seasonal Workers Pilot that became the SWVR managed by DEFRA and the Home Office from 2013 - 2025 illustrated in Migration Advisory numbers in Figure 2.2, with DEFRA (GOV.UK, 2024, November 21), indicating a fall of casual agriculture worker numbers of 7.3% between 2023 and 2024. Therefore, this discussion finds these workers as casual agriculture workers, workers on seasonal visas and GLAA estimated numbers of workers illustrated in Table 2.2, whereby numbers of seasonal workers are illustrated in the HO led SAWS in 2013, that became a Seasonal Workers Pilot, a Seasonal Workers Scheme and the SWVR in 2024.

DEFRA and the GLAA fail the Statistics and Registration Service Act 2007 by not providing GLAA registered worker data and other food manufacturing data to the ONS. The ONS also fails the Statistics and Registration Service Act 2007 because they chose to carry out estimates of ZHC and other food manufacturing data as they explore online job advert data to gain a better understanding of labour demand by occupation. The ONS exploration applies another estimate via a Vacancy Survey to businesses, but agriculture, forestry and fishing would be excluded due to it being a small sector (ONS, 2024, January 16). It is therefore clear that GLAA gangmaster businesses and GLAA sectors are excluded in ONS data including food manufacturing and food processing due to both sectors not having their own sector at the ONS. Even though any requirements for seasonal visas could be calculated, explorations by DEFRA and the government not providing GLAA labour data correctly, continues to provide private gangmaster businesses with the ability to exploit workers who are the precariat in the UK for the long term for monetary gains.

2.4 Summary of Chapter 2

The Literature Review has connected issues raised in the three Research Questions. Subcategories 2.1 to 2.3 linked together the context of regulatory theory (Mustchin and Lucio, 2020) to the GLAA, GLAA workers illustrated in Table 1.1 to Standings 'Precariat' studies, unveiling how neoliberalism helped shape this research thereby providing the foundations for the methodology.

GLAA registered workers illustrated in Table 1.1 are the precariat (Standing, 2011) because they are precarious, vulnerable and fragile, with no resilience to shocks for example the coronavirus pandemic (Standing, 2021). GLAA workers in Table 1.1 are the precariat (Standing, 2011) because they are a marginalised social class excluded in ONS statistics, enabling them to be exploited in work and outside of work because they do not have access to ETs, employment benefits and/or social benefits in welfare systems in welfare states. Peripheral workers in Table 1.1 are the precariat (Standing, 2011), because they work from a CFS which is a ZHC driven by deregulated legislation illustrated in Figure 1.1 with deregulated legislation applied to the GLAA with job insecurity, no secure hours, no secure pay and in many cases with NRPF or welfare. With diminishing security, peripheral GLAA registered workers are the precariat (Standing, 2011) and have had their freedoms marginalised as they provide numerical flexibility in ONS statistics as employees (ONS, 2025, July 17).

There is limited knowledge of how the precariat (Standing, 2011) are exploited and why free movement and inadequate data collection by the ONS props up the Financial Services Sector. Figure 2.3 is not validated by the ALP, but the ALP share the use of their template and dominant model (subcategory 4.1.3.2.3) leading to the illustration of the researcher's realistic second model as Figure 4.2, providing new discussions and understandings.

Guided by the design considerations of Lincoln and Guba (as cited in Rudestam and Newton, 2001, p. 91), Chapter 3 introduces Phases 1, 2 and 3 of the researcher's Work Plan of Stages and Tasks of the Research Topic (See Appendix 3.1). The chapter continues with the researcher's philosophical approach to the research, an outline of the researcher's research design, research strategy and timeframe. Phases 1 and 2 introduce the research procedures, data collection, data management plan and sampling design and Phase 3, provides the approach to the analysis and consolidation of critical realism with historical data, and qualitative and quantitative primary and secondary data.

The following Chapter 3 opens with an introduction to the researcher's philosophical approach, with reasons as to why the researcher could apply their Critical Realism to their Mixed Methods Case Study.

CHAPTER 3: Methodology

3.1 Introduction

Specifically, as the management researcher, the researcher adopted an objective stance and a critical realist research philosophy based on facts, with the benefits of the researcher's framework providing their unobserved events, structures and experiences to respond to the concurrent mixed methods case study research approach (Saunders et al., 2019) which includes qualitative and quantitative data collection techniques with an archival research, before analysis of what, who, when, where, how and why.

An inductive approach is adopted to make an argument that goes beyond the 'Precariat' (Standing, 2011) placing a spotlight on the precariat in food manufacturing, food processing, agriculture and horticulture sectors within the GLAA remit. To gain support and to encourage social change, exploration of the GLAA and the precariat in uncertain work will provide a real understanding of GLAA activity and the GLAA as an IR actor (Heery and Frege, 2006; MacKenzie and Lucio, 2014) and service provider. Research of this significance and complexity will challenge current social models of employment (Gray, 2013), as groups of segregated workers are highlighted by drawing on research of the precariat in non-standard contracts in the GLAA sectors of food manufacturing and food processing.

As a management researcher at the Sheffield Hallam University (SHU), the researcher carried out reflective practice of their observations and experiences. It is the reflexive analysis of themselves in the challenging social environment of the licensed gangmaster industry that is the motivation behind the research, and that has been essential to articulate poor employment practices and exploitation in relation to some UK laws and legislation.

Research into this knowledge gap is of "practical moral and political significance" (Gill and Johnson, 2010, p. 208) and will provide an independent and original revelatory contribution to knowledge (Corley and Gioia, 2011). A contextual picture of the GLAA will impact on the precariat and will challenge policy for practice by assisting for example the Sheffield Needs A Payrise project led by the TUC (2020, September 19) and the academic community (Thomas et al., 2020) to influence wider social policies in practice (Etherington and Jones, 2016a).

3.1.1 Research Philosophy

The foundations for this research are based on the researcher's inductive observations of this unexplored gap in knowledge. This research explores knowledge and draws on critical realism to transform economic and social activity by challenging "the dominant positivist and instrumentalist ideology of science as a means of prediction and control." The researcher examines 'reality' through critical realism (Bhaskar, 2011, p. X). Some knowledge is supported by a statistical analysis of data from business in the form of tables from the ONS with FoI requests to the GLAA.

3.1.1.1 Reflection

Reflection of the researcher's ethics, values, objectives, and examination of current theory at the GLAA is explored in this research (Shaw, 2010). The researcher's values are reflected in the research aims in the axiology arm of research philosophies. The social reality of their research has not been observed, therefore, the researcher provides several reflections that are not visible to an observer, as critical thinking requires several components to recognise reality is influenced by "history, culture and social positioning on beliefs and actions" (Brookfield cited in Alvesson and Deetz, 2000, p. 8).

Interpretivism is suitable for some areas of this research with reasons recorded below. They are followed with an explanation of why critical realism is the researcher's chosen method of research philosophy.

3.1.1.2 Interpretivism

An interpretist philosophy enables the researcher to use an inductive approach to participant observations and other instruments as a worldview to codify and agree knowledge be it real, science based or reproduced, enabling the researcher to create theories to understand the precariat, their employment and relationships from the view of respondents and participants (Lee and Lings, 2008).

As the interpretist can build on existing theories, they are able to construct multiple theories, thereby linking together multiple ideas to create an understanding. An interpretivist approach is therefore used by the researcher to review historical and participant data, and English and Polish respondent primary data in respondent questionnaires.

3.1.1.3 Critical Realism

Critical Realism is the researcher's position because the realist ontology and subjectivist epistemology provide the researcher with the opportunity to be as objective as they choose, with the arm of axiology providing them with the opportunity to provide value-laden research to that of what cannot or has not been observed. The researcher's subjective exploration is a long way from present-day knowledge of the precariat in the licensed gangmaster sectors in the remit of the GLAA. This branch of epistemology allowed the researcher to test their perceptions of knowledge. Acknowledging their subjectivity allowed the researcher to be objective when questioning hypothetical new concepts and theories. The researcher will probe issues and political discourse, exploring new ideas, thus creating new theories from new concepts arranged in methodical orders argued by Forester cited in Gill and Johnson (2010), as structural phenomenology using rhetorical language, to make an argument that provides new knowledge to a wider audience.

This approach allows the researcher's perception of reality' to be explored using reflexive analysis with observations (Costley and Fulton, 2019), and allowed them to examine chronological connections and a series of events and developments (Saunders et al., 2019), including economic capitalist processes of deregulation adopted by labour market regulatory actors (Mustchin and Lucio, 2020) to inform policy, practice and academia for financial, sectoral and labour market regulation (Hancher and Moran, 1989).

Frederiksen and Kringelum (2021) demonstrate the application of critical realism to qualitative empirical management and organisation studies by exploring potential applications of critical realism, including applied critical realism between historical structures, actors and their interplay as critical realism bridges the gap between government, treasury, finance, economic and social policies. This reinforces the researcher's ability to define unobserved aspects including the role and interplay of the GLAA as an actor in the IR system (Heery and Frege, 2006; MacKenzie and Lucio, 2014) that make employment decisions (Gooberman, Hauptmeier and Heery, 2017), as they illuminate the structures of the 'real' world and the researcher's 'observable' world (Bhaskar, 2008). As the researcher theoretically develops this study, they will explore and develop their own knowledge thereby providing a rich picture that includes the triangulation of different sources of data from government and GLAA annual reports, FoI

requests, email communications, semi-structured interviews, a group interview, and questionnaires.

Concepts identified by the research describe the researcher's reality of their interpretation of social reality using critical realism to what has given rise to the phenomena (Saunders et al., 2019). Data gathered makes "use of the unusual or the deviant and unexpected as a source of insight and a mirror whose reflection makes the unknown perceptible in the known, and the known perceptible in the unknown" (Flick, Kardorff and Steinke, 2004, p. 3).

Adopting a critical realist philosophy has enabled the researcher to reflect on structures and theory related to the GLAA (Gray, 2013) to highlight to the observable: their insights, experiences, observations and understanding of the licensed gangmaster sectors. Critical realism is an ontological reality that supports their exploration of the social reality of the need for change and aims to highlight neoliberalism as the dominant discourse, conflicts and contradictions, by questioning the perceptions of the precariat's loss of power in the employment relationship (Burrell and Morgan, 2016) as powerful gangmaster relationships are exposed. The research methods allow the formation of structures (Bhaskar, 2011), power relationships, patterns of conflict and actual events that only the researcher can review formed from ONS and government statistics, government and GLAA annual reports, FoI requests, email communications, semi-structured interviews, a group interview, and questionnaires.

The critical realist philosophical position enables the researcher to explain the context of the role of agency in the GLAA. By exploring who delivers policies to the GLAA and the regulation of work and employment including enforcement of the NMW (Lucio and MacKenzie, 2017), thus present an argument of a light touch approach taken by the government, GLAA, regulators and stakeholders, that endorses licensed gangmasters to expand into informalised areas of the GLAA.

3.1.2 Research Design

A major problem is the lack of access to the GLAA. To overcome this barrier, this research strategy includes a Mixed Methods Case Study research design for advocacy and social change to benefit GLAA workers in the concept of the precariat (Standing, 2011).

The researcher's concurrent mixed methods research design is an exploratory study and incorporates an inductive approach to the analysis of historical and transient knowledge

(Saunders et al., 2019), as they move between their knowledge and experiences, structures of secondary documentary sources and published archival records, reflection and primary qualitative data from emails, FoI requests, semi-structured interviews, qualitative data from a group interview, qualitative data from questionnaires and both published secondary quantitative and qualitative data from the ONS. Bhaskar (2008) describes exploratory collections of primary and secondary qualitative and quantitative data as supporting several constructions, with Guba and Lincoln (1994) describing the range of relationships within constructions shaped by social, economic, and political choices, as the basic beliefs of an alternative paradigm using critical realism to distinguish between the 'real' world and the 'observable' world (Bhaskar, 2008).

3.2 Subjects

3.2.1 Research Strategy

To answer the Research Aim, three Research Objectives, and to respond to three Research Questions, the researcher has chosen a Single Case Study Research Strategy because the boundaries of the research topic and ideas are not initially apparent and have not been observed before. A single case study strategy allows the researcher to provide a critical analysis of the GLAA and some of their workers whereby, the researcher will analyse their reality and observations to develop emergent ideas, all underpinned by critical realism and supported by interpretivist and socio-legal qualitative research in literature.

Figure 3.1 provides an illustration of the Concurrent Data Collection Methods described within this chapter; the different sources of primary and secondary qualitative and quantitative data collected, and informs how each source of data will be analysed with reflection. This will draw three sets of data together to integrate, and cross validate the data to provide a rich picture of the phenomenon. Primary data from semi-structured interviews and group interviews from stakeholders, GLAA FoI requests for the location of information removed online in relation to information and/or GLAA meetings held in 2010, and GLAA and ONS email communications are thematically analysed. The researcher will apply qualitative analysis to open-ended questionnaires from respondents who are workers [GLAAC3] in food manufacturing and food processing. Secondary data from the GLAA, ONS and RoI is organised in such a way as to understand their relationships. ONS statistics are passed to the IMF and World Bank, therefore their published data will be statistically analysed and briefly included, because the UK government provides funding to the World Bank to help reduce poverty in low and

middle-income countries, but then seems able to take the funding back for big business via the precariat working in the UK having travelled from those countries. All primary and secondary data is then integrated and cross validated.

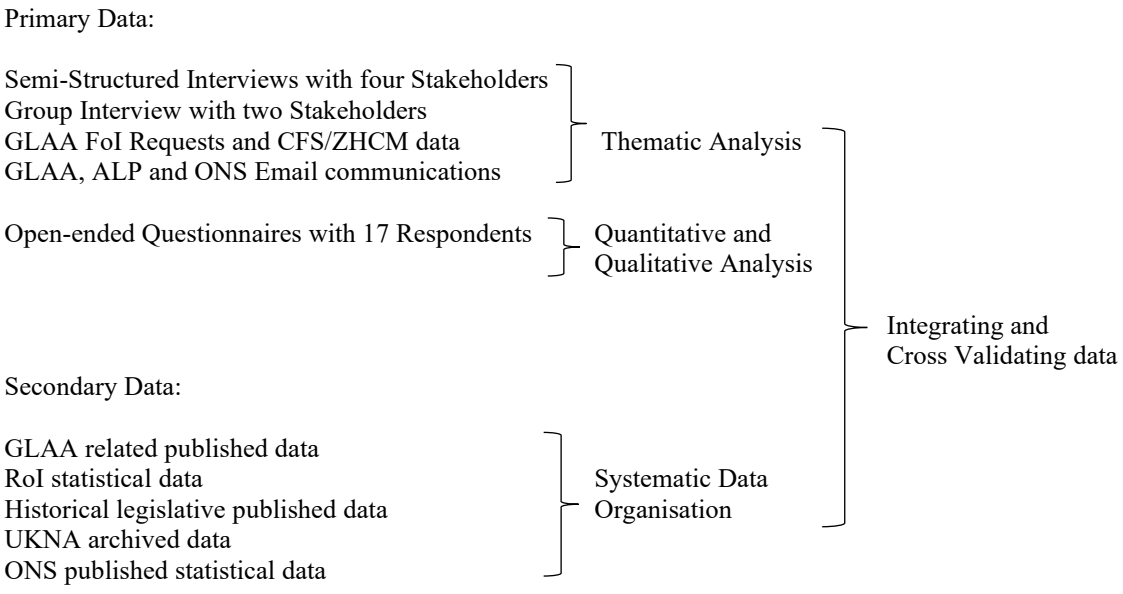

Figure 3.1. Concurrent Data Collection Methods and how Data will be Analysed

Table 3.1 provides a catalogue of stakeholder representation of six participants who agreed to be interviewed.

Stakeholder Representation in GLAA Board Roles, Semi-Structured Interviews and a Group Interview		
Participants:	Contact: via Website, Email or Snowball Sampling	Code Name in Research
Association of Labour Providers	Association of Labour Providers. (2021). *Contact us*.	ALP
Recruitment & Employment Confederation	Recruitment & Employment Confederation. (2021). *Our spokespeople.*	REC
Director of Labour Market Enforcement		DLME
Professor of Practice in the Rights Lab, University of Nottingham	University of Nottingham. (2024). *The Rights Lab.*	RLAB
Two ex-Employees of the GLAA	Snowball Sampling	GROUP

Table 3.1: Stakeholder Representation in GLAA Board Roles, Semi-Structured Interviews and a Group Interview

3.2.2 Time Horizon

The researcher's mixed methods research case study has time and single researcher constraints as illustrated in their Work Plan of Stages and Tasks of the Research Topic in Appendix 3.1 which provides four phases including Phases 1 and 2 for the collection of data from historical explorations of secondary data, Semi-Structured Interviews, a Group Interview and Questionnaires, with Phases 3 and 4 providing time for the Analysis, Findings, Discussion and Conclusions of the research.

3.2.3 Inductive Approach

Drawing on critical realism to explore the GLAA explains the phenomena and complexity of how and why the researcher generated the ideas. To disseminate the researcher's knowledge to a wider audience required an inductive approach to their ideas (Shepherd and Suddaby, 2016) that utilised an exploratory concurrent mixed methods research design. This framework naturally aligns with the researcher's theoretical and epistemological position. Primary data for all objectives was derived from a small number of participants [some of which had carried out former GLA/GLAA board roles], in the form of a single data collection technique of semi-structured interviews and a small group interview (Table 3.1), and from a larger number of respondents in the form of open-

ended questionnaires transcribed and offered to GLAA workers (Table 1.1) in both English and Polish with primary and secondary data collection techniques illustrated in Figure 3.1.

The third objective seeks to locate GLAA workers collected at the ONS, therefore, this exploratory research analyses secondary data in the public domain including at the RoI Central Statistics Office (CSO), ONS and GLAA published data, GLAA Policies, GLAA Strategies, Board and Labour Provider and Labour User Documented Meetings, and primary data from FoI requests for any CFS/ZHC Models, semi-structured interviews, a group interview, and questionnaires.

This supports a case analysis of the GLAA, enabling the researcher to generate theoretical explanations of their statutory and regulatory role and its effect on workers in its remit. This includes an exploration of statistics at the ONS who pass their statistics to the OECD, IMF and World Bank, alongside GLAA governance as literature is consolidated and linked together within a conceptual framework. A case analysis is used to explore GLAA stakeholders creating thick descriptions (Geertz, 1988), and a rich picture of the complexities and social structures surrounding unexplored licensed gangmaster sectors.

The researcher's objective critical realist stance uses a mixed method approach (Creswell and Clark cited in Saunders et al., 2019) that is applied to all objectives (Nastasi, Hitchcock and Brown, 2010). This approach integrates the researcher's critical realism, to qualitative, quantitative and historical data in relation to Figure 2.3. The researcher's critical realist stance adapts flexibility in mixed methods research, which allows for a qualitative analysis of data from the GLAA and ONS and other compilations of precariat data in the UK economy, including employment, business services and financial services data. Inductive reasoning allowed the researcher to explore if there is a gap for example, how the GLAA has regulatory restrictions and how and if government departments provide data to the ONS, accompanied by, how some data is compiled together for decision and policy making, with public scrutiny related to precarious work and GLAA workers.

3.3 Phase 1: Procedures

To report on this empirically, quantitative and qualitative data collection techniques with archival research procedures will be used.

3.3.1 Mixed Methods

The researcher's critical realist stance uses a concurrent mixed methods triangulation strategy. To help schedule their research, Appendix 3.1 illustrates their Work Plan which outlines four separate phases over four years, providing an outline of timescales of the stages and tasks allocated to the research.

The Research Design aligns with the researcher's epistemological critical realist stance as they combine the researcher's experience and critical realism with secondary archival records, documentation, statistics, semi-structured interviews, a group interview, FoI requests, email communications and questionnaires with reflection (Saunders et al., 2019), as a spotlight on the regulations of the precariat in the food manufacturing and food processing sectors in the remit of the GLAA, and the emergence of regulations to prevent slavery and the exploitation of the precariat (Standing, 2011).

The researcher's philosophical approach and strategy enabled them to give equal priority to all data collection techniques, by integrating data as data was analysed, cross-validating data from all techniques, by testing, developing, and assembling theories described by Bhaskar (2011) as the real, the actual and the empirical.

3.3.2 Archival Research of GLAA Literature in the Public Domain

The researcher understands the boundaries of their case study which provides the advantage of mixed methods research. Their realist approach describes multiple structures of complex relationships between the GLAA, its stakeholders and the precariat (Standing, 2011) in its remit. GLAA and stakeholder secondary sources of literature in the public domain include strategies, reports, documented minutes of meetings, letters, policies, letters and licensing briefs. Other secondary sources of data include government, GLAA and ONS national and global statistical data, alongside worker information from labour sectors located in associated websites, newspapers, magazines, company reports, union information, social media and broadcasts (Bainotti, Caliandro and Gandini, 2020). Secondary data provides a multitude of structures, to place a focus on understanding, enabling the researcher to explore for example the Home Office led Seasonal Workers Pilot that became the Seasonal Worker Visa Route managed by the Home Office and DEFRA from 2013 - 2025 in Table 2.2.

The researcher's critical approach allows their 'perception of reality' to be explored by gathering data (Costley and Fulton, 2019). This position allowed the researcher to "preserve chronological connections and the sequencing of events" as a "meaningful" whole (Saunders et al., 2019, p. 209) to inform policy, practice and academia. Some data has been gathered together (See Figure 1.1, Figure 2.1, Figure 2.2, Figure 2.3, Figure 2.4, Table 1.1, Table 2.1, Table 2.2, Table 3.1, Table 4.1, Table 4.25, Table, 4.26, Table 4.27, Table 4.28 and Appendix 1.1, Appendix 2.1, Appendix 2.3). UKNA records also help the researcher provide a free flowing rich picture with thick descriptions (Geertz, 1988), by supplying them with the ability to explore decision making processes by government, DEFRA and the GLAA, whereby stakeholders and beneficiaries were involved in the decision making process providing the how, what, where, why and when of GLAA and gangmaster processes.

Forde (2022) highlights the potential use of archived data for research methods in IR, the sociology of work and management, and provides a positivist HR management case study of the relationship between temporary employment agencies and the UK during the 1980s. The article draws on archival records by contemporary collecting in a world of big data (Bingham and Byrne, 2021) from the 1980s, which confirms the amount of "280,000 people, or 1% of the employed workforce employed in temporary jobs through agencies" (Forde, 2022, p. 189). The Forde (2022) study explores the escalating delivery of employment services in the 1980s in the UK and Australia by temporary employment agencies, their lobbying of government, their expansion of temporary work, economic conditions and political forces of the Thatcher government. However, Thatcher and capitalist activity in neoliberalism have simply complimented and expanded strategies of the Heath government (PREM 15/2069, 1974, March 4, p. 3). For example, the EAA1973 is not included in the archival research data by Forde (2022) because it predates the case study exploration. Having said that, Forde (2022) includes a brief historical category whereby the study identifies some individual agencies as "marketing themselves as 'employers', allowing firms to use temporary agency labour with relatively few obligations and costs associated with being an employer" (Forde, 2022, p. 198) which is a direct link to the EAA1973 (s. 13). Other earlier legislation including The Sheffield Corporation Act 1928 does not appear following a UKNA search, the EAA1973 does appear separately, indicating the UKNA does not provide all data in relation to employment and recruitment agencies together, because amendments to the EAA1973 have been separated from the original Act by the removal of some title terminology. In

addition, the UKNA separates GLAA data from recruitment agencies and businesses because terminology does not link them together and other terminology does not link together recruitment agencies and employers as unlicensed gangmasters because there is no research using this terminology. The UKNA also identifies GLAA input of selected correspondence to the UKNA in 2011-2012 separately, providing the reader with the ability to correctly identify some data from 2010 that has been removed from public records. However, GLAA data should not be in the UKNA because it is not 20 years old (The National Archives, 2024) so there should be a gap in evidence. Present day, use of the UKNA in research produces incorrect insights of licensed and unlicensed gangmasters and workers in the concept of the precariat (Standing, 2011), because data relating to employment and recruitment agencies acting as both licensed and unlicensed gangmasters is not linked together and in any case, this data should not be in UKNA records. This in turn argues neoliberalism, stakeholder relationships and the GLAA enable the expansion of workers in the concept of the precariat as employees into a flexible workforce, thus protecting stakeholders by supporting the GLAA as an unobserved platform for service providers.

In summary, this means some GLAA data has been archived that should not have been archived. Archived GLA and GLAA data was and is not 20 years old and therefore should not be in the UKNA records, indicating the UKNA has not followed their own archival processes.

3.3.3 Data collection of GLAA registered worker numbers

The researcher emailed the GLAA and the ONS for assistance to locate GLAA food manufacturing and food processing workers in ONS data. In addition, the researcher emailed FoI requests to the GLAA as they explored secondary historical quantitative data and present day data collection techniques of the precariat at the GLAA. The researcher collated together secondary historical quantitative data from the UK Census, Labour Force Surveys, Business Register and Employment Surveys (BRES), DWP Registration Population Interaction Databases, the UK Services sector, House of Commons statistical data, links between gangmaster businesses to Companies House SIC and SOC Codes, before carrying out the statistical analytical data analysis of ONS data. The researcher located secondary historical approximate numbers of licensed gangmasters and numbers of GLAA workers in the GLAA remit between 2004 and 2025 in a variety of government reports including GLA and GLAA reports, all of which are illustrated in Table 4.28.

3.3.4 Communication to Unions

The researcher's topic and objectives are of relevance and interest to unions, therefore as the external researcher, existing contacts were emailed who made an initial contact with a regional representative of the TUC.

An initial introductory meeting with TUC union representation allowed the researcher to engage in the social exchange theory (Saunders et al., 2019). To gain their trust, interest and incentive to provide the researcher with sufficient access to respondents, they established their credibility by being polite, open, honest and objective, showing a high level of research competence of their topic including knowledge, understanding and reliability of the application of their research and the benefits to unions, members, workers and non-profit stakeholders. Contact was made a second time via emails sent to the TUC, BFAWU, Unite and GMB unions. Unfortunately, all unions chose not to assist the researcher with their research, and this is identified in Appendix 3.2 that illustrates the researcher's Mixed Methods Research Design of the Research Topic.

3.3.5 Communication to Participants

To establish credibility, trustworthiness and acceptability, the researcher made several polite telephone calls within sociable hours, using suitable language outlining their research topic and how stakeholders could help them, followed up by letters and information via email. Once contact was made, the researcher engaged by communicating with them by email to secure cooperation to attend semi-structured interviews and a group interview (Saunders et al., 2019).

The researcher's Mixed Methods Research Design of the Research Topic (See Appendix 3.2) incorporates the researcher's list of stakeholders for example, the IASC had expressed a desire to develop strategic partnerships by supporting and developing innovative projects with "universities, research institutions and consortia" (Independent Anti-Slavery Commissioner, 2019, October, p. 20). The GLAA recognised the value of academic research and provided a form for Academic Research Requests (GLAA, 2023b). Fifteen participants from the GLAA and six stakeholders were directly contacted via email for interviews. The researcher received six responses from participants that agreed to be interviewed, that are identified in Table 3.1.

Throughout the incremental process, as interview arrangements were agreed, the researcher emailed participants a Participant Information Sheet (See Appendix 3.3) with information that supported their research including the requirements of participants taking part, their rights and how their data is stored. The researcher also provided contact information of whom to contact should they have any concerns. Alongside the Participation Information Sheet was attached the Participant Consent Form (See Appendix 3.3) which was signed by the researcher, then emailed back to the researcher signed by the participant clarifying the "boundaries of consent" (Saunders et al., 2019, p. 268).

The researcher emailed the GLAA requesting access and interviews with board members of the GLAA. Unfortunately, the GLAA was unable to provide the researcher with direct access to any members of the GLAA, although one person at the GLAA suggested the researcher email GLAA board members directly for interviews. Requests to the GLAA for information were transferred to the GLAA FoI Department who responded to FoI requests by email. One person at the GLAA had suggested the researcher email GLAA board members directly for interviews. The researcher followed their advice and received one response from one GLAA board member who agreed to an interview. Unfortunately, this was followed up by an email from GLAA senior management who denied access to the participant and other GLAA board members (GLAA, personal communication, August 12, 2022; GLAA, personal communication, August 15, 2022) (Table 3.1).

Whilst responding to the FoI requests, the GLAA removed all historical documentation from 2004 to 2015 of the GLA from their website, even though the same historical information had already been transferred to the UKNA between 2011 and 2012 prior to the 20 year rule (The National Archives, 2024). This is important because the GLAA are deleting sensitive information that is related to the CLCS that has flatlined the economy and impacted UK workers and citizens that suffer in the Cost of Living crisis.

However, the researcher had familiarised themselves with GLAA documented literature, and although the documents are accessible at the UKNA and were not directly accessible on the GLAA website, the researcher had downloaded the documents information. Nonetheless, the documents Uniform Resource Locators (URL) links to the GLAA still worked, even though the documents were not available on the GLAA website. The researcher had also attended GLAA liaison group meetings which was helpful and enabled them to understand GLAA structures, which subsequently helped them to

organise and arrange a focus group meeting totalling three stakeholders that included the researcher and two ex-Employees of the GLAA (Table 3.1).

3.3.6 Communication to GLAA Respondents

Primary data relevant to the Research Questions was collected from respondents who are workers in the concept of the precariat (Standing, 2011) in food manufacturing and food processing who chose to fill in a printed questionnaire in English or Polish. This was accepted as 'Implied Consent'. Tick box's with orally brief answers reduced recording errors with both the 'ballet' and 'effects' positions avoided (Peterson, 2000). Cognitive access with questionnaires written in both English and Polish (Saunders et al., 2019) enabled the researcher to answer their research objectives and questions in an unbiased way (Creswell and Creswell, 2018).

3.3.7 Concurrent Mixed Methods Research

3.3.7.1 Semi-Structured Interviews, Group Interview and Questionnaires

Figure 3.1 illustrates Primary Data to be collected from semi-structured interviews with four stakeholders, primary data from a group interview with two stakeholders, primary data from GLAA FoI requests and Figure 2.3 related data and GLAA, ALP and ONS response emails that will be thematically analysed. Open-ended Questionnaires are a mixture of hard data collated together from closed-ended and open-ended questions, that were purposive in a single-phase research design before quantitative and qualitative analysis.

Figure 3.1 also illustrates Secondary Data including GLAA, ONS and historical data. This data will be systematically organised with UKNA archived data that includes GLAA related data that is not 20 years old and should not have been archived. All data including UKNA data with historical legislation from the 1970s will be linked together and historically analysed. ONS data will be separately statistically analysed. Following this, all secondary data including GLAA, historical and UKNA data will be systematically organised with ONS data, before the integration and cross validation of both Primary Data and Secondary Data, which will show how the GLAA provides an unobserved platform for gangmaster employers as businesses who are enabled to expand flexible working in the concept of the precariat in Table 1.1 in the UK in non-standard forms of employment as employees.

The branch of epistemology allows elements of legislation in Figure 2.3 to be entered as questions in semi-structured interviews, the group interview and questionnaires, to develop and provide links to data removed from the GLAA online and data not located at the UKNA, to link explanations for the phenomena to neoliberalism, DEFRA and GLAA stakeholders and thus workers in the concept of the precariat.

The inductive concurrent mixed method approach in Table 3.1 enabled causal relationships between the GLAA and stakeholders to be explored (Saunders et al., 2019) with logical open questions which were expanded on during the group interview. Respondent answers were explored establishing their perspectives, views and understanding of for example, worker employment status.

Acting as both narrator and researcher, enabled the researcher to record their own and participants interpretation of events in the formation of the Chronological Development of the GLAA in Figure 1.1 and Appendix 1.1.

Table 3.1 provided a summary of investigative measures including thematic analysis, quantitative and qualitative analysis with systematic data organisation, before the integration and cross validation of all data. This enabled a reliable evaluation of the Findings in Chapter 4, which hence boosted the validity and dependability of the research before the Discussion and Conclusions.

3.3.7.2 Snowball Sampling: Participants

This rigorous design to access stakeholders in Table 3.1 utilised a cost-effective flexible exploratory approach with assistance via Snowball Sampling. This comprised of a response to an email from one interested Professor of Social Justice who assisted with literature and an introduction to a Modern Slavery Research Consortium, two participants at the Catholic Church to an English teaching school and subsequently access to GLAA food workers and secondly, directly via the Catholic Church to GLAA food workers, and a Professor of Employment Relations and a Senior Lecturer of Employment Law who both provided introductions to three participants who may have been difficult to reach (Yingling and McClain, 2015). These participants included two ex-Employees of the GLAA and representation of the ALP.

3.3.7.3 Snowball Sampling: TUC and BFAWU

A period of time passed before initiating a second request for assistance from TUC representation via email. This was the start of an incremental process. Gaining union trust and interest enabled the snowball technique to proceed whereby the TUC emailed Regional Secretaries, Trades Council Secretaries (TUC, personal communication, September 5, 2022) with email communications to the BFAWU, TUC and GMB (personal communication, March 21, 2023; GMB, personal communication, March 22, 2023; GMB, personal communication, March 22, 2023; GMB, personal communication, March 22, 2023). Unfortunately, the TUC, BFAWU, Unite and GMB unions were unable to assist with access to any union members or GLAA Polish food workers [GLAAC3].

The researcher's alternative approach to access hard to reach GLAA Polish food workers would involve Snowball Sampling whereby the researcher asked for assistance in one location, before being referred from place to place and person to person at best described in the following subcategory.

3.3.7.4 Snowball Sampling: Food Workers in the Food Manufacturing and Food Processing sectors in the GLAA remit

The respondents in food manufacturing and food processing and distribution centres are assumed to be mainly EU migrants (GLAA, 2020a). Respondents were identified following snowball sampling that led the researcher from Sheffield to Chesterfield to Doncaster and Worksop.

The researcher approached two Polish centres in Yorkshire and the Humber in England who recommended the researcher visit a Polish shop in Chesterfield. The nonprobability snowball sampling technique proceeded leading the researcher to shops in Chesterfield who recommended the researcher contact two Catholic Churches in Yorkshire and the Humber in England. One church pastor put the researcher in contact with a Polish-English teaching school and respondents, and the second church pastor introduced the researcher to their congregation. Snowballing enabled the researcher to meet with respondents who worked for gangmasters in Doncaster and Worksop in safe open spaces including libraries, offices and church areas.

Voluntary face-to-face questionnaires included a short introduction, incorporating several closed-end and open-end questions that provided areas for random probe explanations (Schuman, 1966). The researcher had developed questions, paying attention to lexical,

idiomatic and experiential meanings alongside the correct use of language (Saunders et al., 2019). Questionnaires introduced factual, demographic, attitude, opinion and event data (Couper, 1997). Five meetings incorporated three voluntary Polish translators who assisted respondents with answering questions in the questionnaire by translating respondent answers.

To avoid confusion, questionnaires were chosen because they refrain from becoming too complex. All questions in the questionnaires had no more than five answers and were written in both English and Polish that were not complicated and easy to understand. English and Polish questionnaires are illustrated in Appendices 3.4 and 3.5. The researcher translated the questionnaire for food workers in the GLAA sectors of food manufacturing and food processing from English into Polish using online Google translation equipment, which was then checked and read by a Polish volunteer in Doncaster who added and corrected a couple of idiomatic meanings.

Pilot testing the questionnaire with one respondent enabled the researcher to check for errors and misunderstandings, thereby ensuring the likelihood of reaching the right person was high and the likelihood of contamination by others was low (Saunders et al., 2019).

3.3.8 Phase 1 and Phase 2: Data Collection, Data Management Plan, Sampling Design

3.3.8.1 Participants and Respondents

"Prior planning prevents poor performance" (Saunders et al., 2019, p. 451), therefore a pilot interview was carried out by a volunteer. A questionnaire was read by a Polish teacher in Doncaster and a Polish volunteer food worker in Doncaster, both acted as respondents, and both agreed all questions were easy to answer.

Three members of the workers with excellent English abilities provided some translation assistance in Doncaster and Worksop.

The sample of participants of the qualitative research is smaller than the larger sample size of workers as respondents.

3.3.8.2 Phase 1: Semi-Structured Interviews with Worker Participants

The researcher emailed 15 participants who were either interested parties or stakeholders in the Mixed Methods Research Design (Appendix 3.2). All participants contacted have been involved in the GLAA and/or the English police force and include the GLAA

Secretariat, are/were GLAA senior management, representation at the ALP (2021) and REC (2021), a Professor of Practice from The Rights Lab (RLAB) at the University of Nottingham (2024), a post and current DLME and representation at the ONS.

The researcher carried out four semi-structured interviews via Zoom and Microsoft Teams with four stakeholders from the ALP, REC, DLME and Nottingham Rights Lab and a focus group interview with two ex-Employees of the GLAA. One stakeholder was unable to assist but provided some written responses to emails, but four non-profit organisations including GYROS, the Romini Centre, Migrants at Work Ltd and FLEX were unable to assist with the research. The remaining stakeholders emailed by the researcher, either failed to respond or their senior management advised they were too busy with other priorities and that the researcher should email again in one years' time. All stakeholders in Table 3.1 were contacted and have an interest in the GLAA that is not limited to critical, opportunist or politically important reasons.

The four semi-structured interviews and group interview of three illustrated in Table 3.1 via Zoom and Microsoft Teams, were in-depth with open exploratory questions generating data of stakeholder stories, theories, arguments, observations and experiences, their understanding of how the GLAA has and does regulate labour, alongside any understanding of the expansion of workers in the remit of the GLAA. All Zoom and Microsoft meetings took approximately one hour each.

The researcher forwarded information of research themes to four GLAA stakeholders prior to the semi-structured interviews. Examples of some themes include participant representation and involvement of decision making at GLAA meetings because two stakeholders had provided licensed gangmaster representation on the GLA board and one stakeholder was a previous GLA board member, thus providing all participants with an opportunity to prepare for the interview.

Prior to interviews with participants and to promote validity and reliability, the researcher ensured they were up to date with past knowledge of the GLA and past and present-day knowledge of the GLAA.

The researcher Zoom and Microsoft Teams four semi-structured interviews and one group interview allowed the researcher to seek facts and to probe meanings. Four Zoom and Microsoft Teams semi-structured interviews and group interview were polite and open, with just one Zoom meeting whereby ALP representation tried to lead the conversation.

Another participant prior to their interview confirmed another colleague may be attending the interview, but it was not made clear who their colleague was because they had not been invited to the interview by the researcher and had not signed consent forms. Should there have been any extra colleagues in the interview the participant did not confirm this but nonetheless, the participant clapped their hands a few times as though to request other people's attention and/or for help with responses to the researcher's questions. This was noticed by the researcher because pieces of paper were passed to the participant on screen to read from.

Representatives from the ALP, REC, DLME, and a Professor of Practise from The Rights Lab at the University of Nottingham and two ex-Employees of the GLAA were guided in such a way as to seek answers to all three Research Questions. The sample of participants provided substantial primary data.

Triangulation of primary data generated from the semi-structured interviews and group interview provided perspectives of the stakeholders of the GLAA (Costley and Fulton, 2019). To ensure research was valid and reliable, findings were transcribed with new meanings and interpretations of data checked with stakeholders and literature to ensure their realities matched what the researcher had recorded or written down (Saunders et al., 2019). Maintaining the highest standards of rigour, the same techniques were applied to the collection and analysis of all qualitative and quantitative data to generate "the most informative, complete, balanced and useful research results" (Johnson et al., 2007, p. 129). Access and participation are now completed.

3.3.8.3 Phase 1: Group Interview with two ex-Employees of the GLAA

Two ex-Employees of the GLAA responded to the researcher's email request for semi-structured interviews and agreed to meet with the researcher as a group interview of three with access and participation completed. The research topic was pre-determined, enabling participants to speak freely, answering questions, some of which they chose, but matched those of the researcher. The group interview was carried out via Zoom and all participants understood the topic and each other's contributions, enabling them to add to each other's comments in the Discussion.

3.3.8.4 Zoom and Microsoft Teams

Semi-structured interviews and the group interview were held via Zoom and Microsoft video conferencing (Archibald et al., 2019) which was mutually agreed as a safe space

with quiet surroundings. The researcher scheduled Zoom meetings and emailed links to participants. In response, the researcher received one request whereby the participant emailed their own Microsoft Teams link. The researcher's clothes reflected Zoom and Microsoft Teams interview surroundings, and a prepared Participant Information Sheet and Consent Form illustrated in Appendix 3.3 were sent via email prior to interviews. All forms were then signed and returned prior to the interviews. Adopting an open posture with neutral responses, the researcher demonstrated trustworthiness and confidentiality by assuring anonymity to participants enabling them to be calm, comfortable, and relaxed.

3.3.8.5 Recording Participant Interviews

Emailed Participation Information Sheets explained the research purpose, restated the assurance of confidentiality and anonymity, the nature of any findings and how findings would be used to assist a socially deprived workforce. Requests were made to audio-record the interviews, and notes were also taken in case audio-recording had not worked. The researcher then summarised the research topic and themes, the time available for the interviews, with a request for participants to sign the Consent Form. To avoid bias, no leading questions were used (Alvesson and Deetz, 2000). Questions began with 'What' or 'How' or 'Why' enabling the phenomena to be explored.

The researcher asked participants in Table 3.1 for second meetings to follow up any new information or themes and three participants agreed, although they were not accessed. Three semi-structured interviews via Zoom and one Microsoft Teams Interview with the participant who clapped for assistance in the interview, and one group interview via Zoom were transcribed onto Word documents and a Word copy of each interview was emailed to the participants in Table 3.1. Interview guides are illustrated in Appendices 3.6, 3.7, 3.8, 3.9 and 3.10 and were written in such a way as to gain individual stakeholder perspectives and understandings. The researcher had chosen different and/or similar questions for each stakeholder because some stakeholders had carried out GLAA board roles, some had carried out GLAA policies as per directions from GLAA board members, and one stakeholder had been formerly employed by the English police force. However not all questions were used. This is because as research commenced, the researcher had been denied access to the GLAA by their senior management. Therefore, the researcher chose not to ask some questions to avoid any possibilities of interviews being cancelled and/or the escalation of some topics whilst in discussion. Although exact topics could not

be foreseen, the researcher understood the licensed gangmaster sector and reduced the topics for discussion.

3.3.8.6 Phase 2: Questionnaires for Worker Respondents

Primary data was collected in the form of exploratory open-ended questionnaires from 17 GLAA workers in the food manufacturing and food processing sectors. Respondents did not include workers from the agriculture sector.

A concurrent mixed methods design enabled the researcher to explore and examine theories including whether the respondents understand what type of contract they worked from for example a CFS or CoE, and if the respondents received regular hours from their recruitment agency/gangmaster.

3.4 Instrumentation

3.4.1 Internal Validity: Participant Semi-Structured Interviews with GLAA stakeholders, and Group Interview with two ex-Employees of the GLAA

The link between the researcher's realistic observations and experiences, and how the phenomenon occurs, required a brief exploration of their ontological and epistemological positions. Evaluation and reflexivity (Edwards, 1998) have been the drivers behind the research topic. The concept of reasoning is an internal validity, and a strength of the researcher's mixed methods research, whereby critical realism assisted the analysis of literature and data to develop new ideas and to solve problems. Arguments strengthened the recognition of dependent and independent variables for example legislation in Figure 2.3 and its effect on workers in the concept of the precariat (Standing, 2011) and society in the UK, described by Campbell and Stanley (cited in Gill and Johnson, 2010) as a strength of inductive research.

Internal validity is tested using trustworthy key sampling. As a critical theorist, the researcher reflexively cross examined and continuously analysed all their assumptions and theories (Kincheloe and McLaren, 2011). Secondly, the researcher desensitised their regimes of truth to ensure credible constructions of concepts, theories and models. Third and supported by Freire and Schwandt (cited in Gill and Johnson, 2010), the researcher challenged current accepted practices of employment and regulations because the researcher seemed able to predict many of their ideas unfolding.

Qualitative and quantitative primary and secondary data supplement and boost the dependability and validity of the data, providing the foundations of new theoretical

explanations including why GLAA workers do not sustain employment. Therefore, it was important the researcher did not create interview bias by influencing participants with pre-conceived ideas, enabling the analysis of primary data from participants and respondents to support generated theories in response to the research topic and its research questions and objectives.

3.4.1.1 Advantages: Qualitative Interviewing Techniques of Stakeholders

Selected theoretically based qualitative interviewing techniques provide numerous advantages that enabled the researcher to provide an inductive approach to thematic analysis. Theories and models were tested (Saunders et al., 2019) for example, testing both primary and secondary data for the application of legislation in Figure 2.3, and/or the relationships between the GLAA and its stakeholders by incorporating critical realism and neoliberalism with new ideas accompanied with valid explanations.

Apart from efficiency savings, the benefits of the group interview provide participants with the ability to add to each other's explanations as participants consider their own and each other's responses, thereby supplying the researcher with supporting data of a group understanding to a question.

Alternative explanations also provide intervening variables exploring why there may be some negative outcomes for GLAA workers for example, the collection of categorial data by the ONS and how it accumulates its employee data and then identifies high employment rates, even though food workers in the GLAA remit are not permanently employed on a CoE as employees.

3.4.2 External Validity/Transferability: Respondent Questionnaires for GLAA workers under GLAA regulations

All research findings in this study contain viable full descriptions of generated hypotheses and where causality could not be determined, the researcher made FoI requests to the GLAA for copies of the minutes of all meetings from April 2010 to November 2010 that may be numbered consecutively from approximately 26/8.7 through to 27.71 in relation to some documents that could not be located, because this is a notable section of numbered literature missing on the GLAA and UKNA websites that have been removed from observation online. The GLAA emailed response:

> There were no Board meetings between those on 21 April 2010 and 25 November 2010. You will see they are consecutively named 'twenty-sixth board

> meeting' and 'twenty-seventh board meeting'. There was a Liaison Provider Liaison Group meeting on 7 September 2010 (GLAA, 2022, August 17).
>
> In line with our Retention and Destruction policy, information held relating to liaison group meetings for the period you requested was deleted from our shared drive in May 2022 (GLAA, 2022, August 17).

LeCompte and Goetz (cited in Bell, Bryman and Harley, 2019) argue small samples of participants including the six participants and 17 respondents may not provide enough external validity. However, this valid and reliable new revelatory contribution to knowledge has labour sector to sector transferability and although a challenge, areas of the research could be replicated and applied to a broader context described by Merton as vital (cited in Gill and Johnson, 2010).

To work against such concerns and any built-in bias, the researcher collected data in the form of questionnaires from the precariat totalling 17 GLAA workers [GLAAC3] in two single sectors of food manufacturing and food processing with different gangmasters illustrated in Appendix 3.2. This transparent research incorporates both population and ecological validity that could be extrapolated to other labour sectors of similar social context that use gangmasters with SLAs.

3.4.2.1 Advantages: Qualitative Questionnaires from GLAA Workers

Qualitative open ended questionnaires have been written in English and translated into Polish. This has provided GLAA workers with the ability to choose a questionnaire with open questions in either English or Polish, thus enabling them to understand the questions and to write freely in either language. English and Polish were chosen because there are large amounts of EU-migrants from Poland working in the GLAA food manufacturing and food processing sectors. The questionnaires provide complete anonymity, were not expensive, were quick and fast to complete by workers, provided instant data, and were easy for the researcher to analyse, compare, and cross validate alongside participant data.

3.4.3 Reliability, Dependability and Reflexive Analysis

The researcher's concurrent triangulation design is tailored to a unique "emergent research situation" (Johnson, Onwuegbuzie and Turner, 2007, p. 127). This account of the GLAA and food workers in their remit contains substantive information in the Literature Review that was available in the public domain which has been condensed to provide a rigorous background for the research. Researcher errors and bias and factors that could cause participant error and bias were avoided, by recording participant

interviews and providing respondents with questionnaires that were filled in by either the respondent or with help from a voluntary Polish translator.

For several years, the reflective practice of the researcher's observations have been related to up to date information in newspapers and literature, by contacting unions, ministers of parliament and policy makers to gain an understanding of the relationships between gangmasters and FMCs. It is the researcher's reflexive analysis (Finlay, 2002) of themselves in the challenging social environment of the licensed gangmaster industry that has been essential to articulate the ideas. The researcher's reflexivity, cultural reflexivity and contemporary research have revealed certain surprising facts, enabling a new contribution to knowledge that includes the exploration and location of deregulated legislation, unobserved active legislation with the development of Figure 2.3, that provides a concept of how legislation is applied with critical realism in the licensed gangmaster sectors.

Even so, all data collection, concepts and theories have had their sources accurately recorded and justified with rigour, thereby providing an accurate audit trail.

3.5 Phase 3: Thematic Analysis

Thematic analysis provides a flexible approach to the analysis of qualitative and quantitative data and is ideal for the researcher's realist and objective research position as they transcribe data, search for themes, patterns, and actions to underpin their ideas described by Creswell (2014) as a creative process. Themes and relationships of participants defined by neoliberalism, are underpinned with secondary data that informs primary data (Saunders et al., 2019).

Critical Discourse Analysis (CDA) supports the researcher's critically realist approach to the social reality of their research that has not been observed; therefore, the researcher chose a traditional method of coding for all data by hand, this includes memo and paper labelling with coloured pens to enable the researcher to follow and display new patterns, themes and understandings, that software is also not able to locate.

3.5.1 Qualitative Data

The researcher's flexible adaptable thematic analysis (Braun and Clarke, 2006) of critical realism with primary data from semi-structured interviews, a group interview, FoI requests and emails are followed by the analysis of historical and present day literature

and some parliament inquiries, alongside the analysis of primary and secondary information and statistics of workers from the GLAA and ONS. The researcher's inductive approach used a flexible adaptable thematic analysis (Braun and Clarke, 2006) to test hypotheses to identify theories and themes that underpin their objectives.

Additional secondary data is multi-sourced from audio and visual documents, GLAA literature, government reports, journal articles, websites and parliament inquiries and other broadcasts, for example the Resolution Foundation (2023), all of which have been thematically analysed and categorised carefully. Nonetheless, some participant data for example in relation to Technical Issues of the GLAA will be located by coding and labelling data illustrated in Figure 3.2.

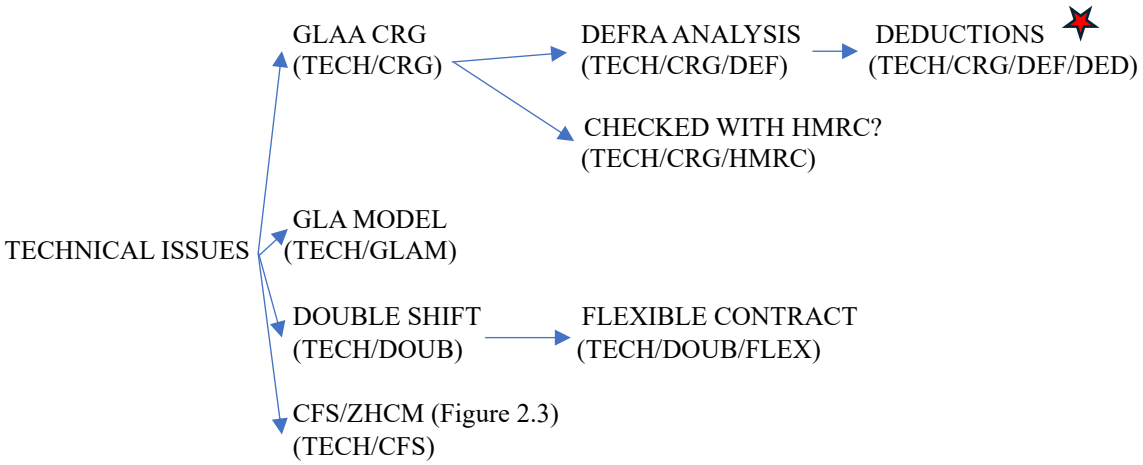

Figure 3.2. Technical Issues of the GLAA: Coding and Labelling Data

Merging primary and secondary data has helped the researcher analyse unforeseen new discoveries and insights, as well as linking together historical literature to the researcher's critical realism with events and observations, and primary data with methodological triangulation of research data undertaken objectively (Denzin cited in Johnson et al., 2007). Multi-sourced data is clearly referenced. ONS and other statistical data will be identified as their graph with full descriptions and references.

As a critical realist researcher, data from meanings and images collected from qualitative semi-structured interviews and the group interview were analysed following each interview (Saldana, 2016). The researcher transcribed audio-recorded interviews, before anonymising them and saving them as Word-processed files.

3.5.2 Quantitative Data

Quantitative data from GLAA respondents in Appendices 3.4 and 3.5 was measured numerically and recorded because it was easier and quicker for the researcher to simply count with coloured pens. Discrete data was counted, and integers analysed and collapsed into bar charts and tables to reflect the researcher's topic and objectives for example, a stacked bar chart can be used to test precariat knowledge of the GLAA, or a table can be used to locate where a GLAA licensed gangmaster is registered in UK government bodies, and which governing laws they operate from, thereby analysing the possibility public policies have failed the precariat. Some open qualitative data from questionnaires has also been integrated and merged with other qualitative data of the same theme.

Using a framework of thematic analysis as a constructive tool, enabled the researcher to explore findings from the data, to support the illustration of the researcher's model of a Managed Service Provider Model as Figure 4.2 that is applied by licensed gangmasters in the Home Office led GLAA as per the organogram illustrated as Figure 2.1, with secondary data located in historical legislation including the EAA1973 and others in Figure 1.1 and Appendix 2.1, then added to primary data used to expand the flexible workforce. This is significant because there is persistent poverty from severe economic, social and health disparities with hungry adults and children visiting food banks, as they suffer in the Cost of Living crisis.

3.5.3 Interpreting Expertise

The researcher received help and the expertise of three Polish members of the precariat: one person had a master's degree in Higher Education and the second person was studying English at an English/Polish School, the third was a Polish/English Teacher, who all assisted the researcher with their professional translation and interpreting expertise (Piekkari, Tietze and Koskinen, 2019).

3.5.4 Consolidation of Data

Critical realism with secondary historical and recent data collected from government, GLA and GLAA literature, some GLAA primary data retrieved following GLAA FoI requests, primary and secondary statistical data retrieved from personal communications, and secondary literature with primary data from semi-structured interviews, a group interview and questionnaires were merged and linked together to compare, examine and

analyse variables and findings in the qualitative data to findings in the quantitative data and vice versa (Roulston, 2014).

The researcher has knowledge of how legislation is applied in the gangmaster sectors, the GLAA, stakeholders, participants, and respondents, therefore answers were easy to analyse (Peterson, 2000). This comparison and consolidation of data shows undiscovered relationships and trends, and displays several dependent and independent variables that may have been manipulated over time.

3.5.5 Reflective Diary

The researcher's learning process correlates with the four stage learning cycle of Honey, Mumford and Kolb cited in Marchington et al. (2016), whereby the researcher has concrete experience, observations, and abstract concepts, and it is these concepts the researcher benefits from. Interim summaries of anything at all of interest including reflective ideas thoughts and experiences were continuously noted. To advance bracketing in their qualitative research and importance throughout the early stages of the research, all information was initially noted in a reflective diary as an analytical aid (Costley and Fulton, 2019; Saunders et al., 2019; Tufford and Newman, 2010). The researcher's reflective practise (Bull and Taylor, 2014) incorporates personal experiences that encouraged reflective and observational notes to be continuously written and then attached to new ideas with thick descriptions (Geertz, 1988) of emerging interpretations and avenues to explore (Schutt, 2018). As the research progressed, the reflective diary changed whereby the researcher's reflective practise and abilities enabled them to foresee events happening, thus encouraging them to move away from a reflective diary to research and write a book of events with a new dimension to political discourse.

The researcher has maintained objectivity from the outset with both reflective and reflexive practise and any preconceptions were identified and explored (Ahern, 1999), then examined critically. The researcher has not been swayed by academic opinions and perspectives and has taken an independent and autonomous perspective on the issues within their project. This has consequently ensured some painful and upsetting factual economic and political surprises have not been misinterpreted or distorted or hidden but are findings in their PhD (Doctor of Philosophy) at the SHU that has developed them as a researcher.

The researcher was previously a recruitment manager in the GDMR food manufacturing and food processing sectors. Critical reflection enabled the researcher to consider the impact of their research on participants and respondents (Williamson and Burns, 2014). To maintain objectivity, data or literature has not been misinterpreted or misrepresented. Guidance was provided by a small number of pamphlets including the Personal Safety and Lone Working pamphlet (Suzy Lamplugh Trust, 2024), Personal Safety at Work: A Guide for Everyone (Suzy Lamplugh Trust, 2019) and A Code of Practice for the Safety of Social Researchers (Social Research Association, 2001).

To provide the reader with an understanding of political projects (Bacchi, 2010), critical realism and reflective practise (Bull and Taylor, 2014) are supported with factual published secondary data to enable licensed gangmaster dominant forms of discourse (Jeffery, Thomas and Devine, 2019) as 'the police' (Rancière, 1999) to be filtered. This research has brought together different revelations to challenge and explain 'relations of domination' (Thompson, 1984) that result in 'discourses of societal (in)justice' (Jeffery et al., 2019) for public debate and social change.

3.5.6 Analysis: Zoom and Microsoft Teams Interviews

All Zoom and Microsoft Team meetings went very well and started and finished at the right time. The researcher had been clear beforehand what the meetings would be about, and the right players were invited for interview. One participant had been a little difficult by trying to lead the conversation, but all interviews including the group interview provided interesting responses and were very productive.

3.5.7 Research Ethics

Ethical issues were applied at all stages of the research (Bell et al., 2019) including and not limited to: integrity, fairness, open-mindedness, respect for all participants and respondents with avoidance of harm (Costley and Fulton, 2019) and the privacy and rights of participants and their right to withdraw from the research. The researcher provided all competent participants with sufficient information of the research to enable them to provide the researcher with informed consent, to ensure confidentiality of those taking part and the data they provided, and for the researcher to assure participants and the SHU those assurances to the privacy anonymity and confidentiality of data collected, analysed and reported is guaranteed (Saunders et al., 2019).

The researcher's pro-active continuous self-reflection ensured they were aware of both participant and respondent perceptions and understandings of the research topic. The researcher's reflexive self-awareness was vital enabling them to communicate with stakeholders and the precariat to gain their trust and understanding as they explained thoroughly procedures or questions. All participants and respondents were treated the same for example, the researcher's reflexive verbal communications supported by worker colleagues, a teacher plus assistants including two Reverend Fathers of the Catholic Church, alongside the researcher holding out a questionnaire to a respondent written in their language, supported where the researcher was coming from and what it meant (Bell et al., 2019).

The researcher's research objectives, questions, and research design had acquired the traditional access to conduct semi-structured interviews and a group interview with stakeholders. Assistance from the Catholic Church directly and to a Polish-English teaching school, had assisted the researcher with the handing out of questionnaires to food workers in the GLAA remit.

3.5.8 Data Management Plan

All data was formalised in a data management plan and stored in the SHU Research Data Archive that has Cyber Essentials certification. Following an Ethics Submission, Converis supplied the deletion date for research data applied to this research (SHU, 2025a). Ethics Approval was provided on the 1st of November 2021 (See Appendix 3.11). Conforming to the deontological view of ethics, the researcher followed the SHU code of ethics. All research is reported transparently (Elm et al., 2007), and all participants in the research were treated with dignity and respect. When access was granted to carry out the research, the researcher maintained their objectivity to their research aims by ensuring no upset or deceit was inadvertently incorporated in their research by subjectively choosing what to audio-record, including participant privacy and/or falsifying or fabricating data (SHU, 2025d). As an external researcher and student of the SHU, the Epigeum package 'Research Ethics 1' was completed (Oxford University Press, 2020), the SHU Research Ethics Policy and Procedures (SHU, 2025b; SHU, 2025c) with additional Research Ethics policies guided the research (SHU, 2025c), with all underpinned by the SHU Commitment to the Concordat to Support Research Integrity (SHU, 2025). The researcher abided by the eight principles which formed the ICC/ESOMAR International Code (Joe, Raben and Phillips, 2016).

This research was a very low risk human participant study with Informed Consent conforming to all SHU legal requirements (Bell et al., 2019). At a meeting held between the researcher and their supervisors, the research proposal was discussed, a Health and Safety assessment carried out, and an Ethics Review Application submitted for ethical review through Converis, all in accordance with Research Ethics policies (SHU, 2025b) and commonly agreed standards of good practice as laid down in the Declaration of Helsinki, Research Councils and the European Science Foundation and the General Data Protection Regulation 2018. Following approval procedures, the Work Plan as a Gantt Chart illustrated in Appendix 3.1 provided timings allocated to each task in the research proposal.

3.5.9 Limitations

It is important to recognise the limitations of this research based on the methodology and the approach taken for access to the precariat and stakeholders of the GLAA, and access to documentation which is limited due to some documentation moved to the UKNA earlier than required, and other documentation removed from observation.

3.6 Summary of Chapter 3

Critical realism allowed the researcher to be as objective as possible and mixed methods data collection helped the researcher provide a rich picture of contradiction, economic capitalism and political discourse between GLAA stakeholders. As risk was lowered to the precariat at the bottom of the food supply chain, applications of critical realism (Frederiksen and Kringelum, 2021) were applied, then moved between data allowing methodology to link together power relationships, patterns of conflict and actual events that only the researcher could see (Bhaskar, 2008; Bhaskar, 2011).

To conclude, Chapter 3 has provided the Methodology including the research design, approach, techniques and communications to participants and respondents, thematic analysis, the progression of the researcher's reflective diary to a book, the ethics and Data Management Plan. Data collection has concluded.

The flexible approach of thematic analysis to the integration and cross validation of all data into categories is now drawn together from the researcher's observations, events and experiences, historical and present-day data, interviews and questionnaires.

The researcher will now progress to displaying the data visually, followed by a Discussion in Chapter 5 and Conclusions in Chapter 6. Miles, Huberman and Saldana (2014) talk about the advantages of Computer Assisted Qualitative Data Analysis Software (CAQDAS). Nonetheless, CAQDAS and any type of software is not used to assist with participant data analysis or to display findings because content searching, linking, coding, and mapping tools, will not assist the researcher to simplify their unobserved reliable and realistic social constructs.

Historical data, questionnaires and interviews aligned with all three research questions and all categories are listed under each data collection technique in the following chapter.

Chapter 4 therefore provides the Findings chapter with acknowledgements to the three Research Questions, followed by primary and secondary data identified and displayed as figures or in pieces of text, bar charts and tables, that show power relations within themes and patterns, as text is linked together to describe the unspecified structures of the licensed gangmaster sector of the 'real' world and the researcher's realistic 'observable' world (Bhaskar, 2008).

CHAPTER 4: Findings

4.1 Introduction

Critical realism is the researcher's research philosophy and acknowledging their subjectivity allows the researcher to be as objective as they choose. By examining the perceptions of the precariat's loss of power in the employment relationship, the researcher exposes new unexamined conflicts, with neoliberalism as the dominant discourse, with contradictions as powerful political gangmaster paymaster relationships are uncovered. The researcher's perceptions of knowledge will be tested as new ideas are explored with new theories and concepts, as the researcher's understandings of the GLAA and licensed gangmaster sector are displayed to a new audience.

The first four significant aspects amplified by the Literature Review in Chapter 2, identified the precariat in the concept of GLAA licensed workers (Table 1.1) and their employment status, the application of the CFS to the precariat, and deductions and payments from precariat weekly wages via payslips, with the precariat absence alongside the food manufacturing and processing sectors at the ONS. The Findings and Analysis that follow, will respond to the significant aspects associated with answering the Research Questions by meeting the Research Objectives.

4.1.1 Phase 3: Findings of GLAA Historical Data

Different pieces of historical data were located in the UKNA, on GLAA and ONS websites, licensed gangmaster websites, government and trade union websites and parliament enquiries.

Findings start with Lord Ernest Bevins White Paper Employment Policy (1944, May). This document is of great significance and was designed to avoid a Cost of Living crisis after World War 11 by maintaining full employment in the UK. This would be achieved by creating conditions to expand exports with expenditure on goods and services that balanced sheets for the future (Bevin, 1941, p. 28; Bevin, 1942, p. 9) with payments in coal, steel, manufacturing and processing, thus ensuring stability of prices and wages to maintain the Cost of Living. The Balance Sheet Of The Future (Bevin, 1941), The Job To Be Done (Bevin, 1942) and Lord Bevins White Paper (1944, May) are relevant to the GLAA because eight decades later, there is a Cost of Living crisis in the UK, but in contrast to Bevins White Paper, there are high numbers of employees in employment in the UK, but these numbers include GLAA workers in Figure 4.2 as employees in food

manufacturing and food processing in goods and services. The White Paper Employment Policy (1944, May) incorporated employees, but the same employees are now GLAA workers [at best presented in the researcher's model illustrated as Figure 4.2] and then absorbed as HID in meat products in goods for services in the Services Sector (HM Government, 2020, December 17), inflating the Financial Services Sector at the ONS and providing contrived high employment figures at the ONS. It is important to note that balance sheets at HMT do not include separate food manufacturing and food processing sectors at the ONS, the balance sheets do not include the checking of payrolls that incorporate GLAA workers, and/or the expenditure in goods and services of imported/exported manufactured and processed food as per other sectors (Employment Policy, 1944, May; ONS, 2025, July 17).

The Literature Review identified political discourse at high level meetings that has enabled the changing of legislation and terminology to suit gangmasters for financial gains for example the EAA1973 and ERA1996, and subsequent legislation illustrated in Figure 1.1 that provides a timeline of WTO and EU legislation diluted into UK legislation. Since the inception of the EAA1973, powerful relationships have grown supported by neoliberalism that led to the HO led GLAA to provide a platform for gangmasters with overseas gangmasters, with all gangmasters provided with the ability to purchase gangmaster licenses outside the UK with uncontrolled advertising for workers via open border policies into the UK, with things set up in such a way for gangmaster businesses to be exempt from HMRC investigations.

Stakeholders include the gangmaster trade association ALP, who in response to the researcher with regard to employee and worker status in subcategory 4.1.3.2.5, advised the researcher to look at the ERA1996 s.230(1.b) to establish employment status, which is not correct.

Figure 1.1 illustrates EU legislation that has been applied in the UK as legislation that provides open borders. UK legislation is supplemented by other legislation for example in Appendices 1.1 and 2.1, although some legislation has not been applied to the GLAA and/or has not been applied in the same way to all four nations of the UK.

This has subsequently provided for the free movement of workers, in particular via the CTA from the EU RoI into NI, and then for workers to keep moving or be transported predominantly to the North of England to work within the researcher's realistic model of a GLAA/MSPM (Figure 4.2). Stakeholders and government provide incorrect

employment terms with legislative terminology including for example: ‘agriculture’, ‘processing’, ‘meat preparations’, ‘food and other necessary goods’ or ‘food preparations’ and ‘meat products’ as legislated descriptors that enable the free movement of people, all of which support the ability of GLAA workers to be absorbed and HIDden as they are moved in and out of the UK by paymaster gangmasters (HM Government, 2020, December 17; HM Government, 2023, February, p. 8; HM Government, 2024, January).

In 1992 Sir Alan Budd (BBC, 1992, June 22) talked about Thatcher’s policies that “raised unemployment” by “reducing the strength of the working classes” by creating a “reserve army of labour”. Therefore, Heaths EAA1973 expanded by neoliberalism (BBC, 1992, June 22), with the implementation of EU Directives of the Social Chapter, shows government policy layering with a deregulatory agenda that has provided licensed gangmaster paymasters, with the ability to eat away at the UK workforce, whereby some sectors with a UK workforce have and are replaced with GLAA registered workers in Table 1.1. This is supplemented by the setup of the Office for Budget Responsibility (OBR) [also an NDPB], which was formalised by The Budget Responsibility and National Audit Act 2011 (commencement No.1) Order 2011. This subsequently enabled the expansion of an EU or international workforce because the lack of social security would mean GLAA workers would have NRPF. The expansion of this workforce has fuelled discontent, subsequently leading to the requirement of the GLA which was set up to protect workers from exploitation, changing to the GLAA which was set up to investigate worker exploitation across the entire labour market in England and Wales, although in Scotland and NI, the police have primary responsibility to investigate worker exploitation.

4.1.2 Phase 3: Findings of Worker Respondent Data

To assist with answering Research Questions 1 and 2 and to meet the Research Objectives, discrete numerical survey data has been gathered, counted and transformed into precise quantifiable data from nine English questionnaires and eight Polish questionnaires. English and Polish questionnaires posed a series of questions in relation to Research Questions 1 and 2 that received a sufficient sample response size of 17 respondents and any comments written in Polish had their idiomatic equivalence implemented into the data.

Primary respondent data was then checked for errors and stored in tables illustrated in Appendices 4.1 to 4.8, before data was presented in pie charts, bar charts, frequency

polygons and further tables. Data presented in this way shows the highest and lowest quantifiable data, or the proportion of data as a percentage, and then as a segment according to the share of categories chosen by the respondents, before Analysis, Discussion and Conclusions.

The total number of respondents in the survey data are 17, identified in the table below (Table 4.1). Seventeen respondents equal 100.00% (n: 17) and one respondent equals 5.88% (n: 1), with ten male respondents that equal 58.80% (n: 10) and seven female respondents that are equal to 41.16% (n: 7).

Number and Percentage of Respondents in Questionnaires				
Respondents	Number of Respondents	Interpreters help with English Questionnaire	English Questionnaire	Polish Questionnaire
Male	10 (58.80%)	4	3	3
Female	7 (41.16%)	1	1	5
Total	17 (100.00%)	5	4	8

Table 4.1: Number and Percentage of Respondents in Questionnaires

The quantitative analysis of this data does not include the comparison of different groups of people via tests for example males versus females in any pie charts, bar charts, frequency polygons and tables. Males and females are treated the same because the HO led GLAA, licensed gangmasters, GLAA CRG (Appendix 2.1), GLAA workers (Table 1.1) and the huge volume of gangmaster payrolls and payrolled hours, do not differentiate workers as male or female, and/or their age or nationalities in the GLAA sectors of food manufacturing and food processing in Yorkshire and the Humber or any other regional UK ONS data. Following discrete data gathered in tables located in tables in Appendices 4.1 to 4.8, each survey question is then presented with its own respondent ratio data presented as precise integers in either a bar chart or frequency polygon, or as a percentage in a pie chart to express proportions, or in a table to provide visual understandings for the reader.

4.1.2.1 Statistical Hypothesis Tests

This is new research whereby respondent data will show why it has been collected and collated in such a way for example, how and why neoliberalism provides for laws and legislation to provide the ability to skew statistics providing for the precariat to be Hidden as Incomplete Data.

The researcher looked at a variety of statistical hypothesis tests to see if they could assist with the analysis of their small sample of 17 respondents. Table 4.2 provides a variety of statistical hypothesis tests that were not applied in this research, with reasons as to why those tests were not applied to the research.

Statistical Hypothesis Tests	
Nvivo	Nvivo is not used because statistical software has not been used in this research and in any case, at least 50 respondents are required to carry out this test
Shapiro-Wilk Model	The Shapiro-Wilk model is not used because it evaluates if the respondents were normally distributed by representing the central point of the data in random samples of for example 2-3000 responses
The Chi Square Test	The Chi Square test is not applied because it is a statistical test for categorical data. The quantitative data in this research is discrete data and, in any case, groups of people for example male versus female will not be tested because GLAA workers in Table 1.1 are not treated differently. Assisted by the Red Tape Challenge in 2011-12, food manufacturing and food processing workers work a variety of roles in a licensed gangmaster FMCs factory, including assisting food preparation [GLAAC3], making the food products [GLAAC3], cleaning [GLAAC2], in the food warehouse or storage [GLAAC2], as a forklift truck driver [GLAAC2] and packing the food from a production line [GLAAC2]. GLAA workers therefore carry out different jobs in food manufacturing and food processing and will describe their job roles differently to those of the licensed gangmaster, whereby all workers are the same on the licensed gangmaster payroll
Analysis of Variance Test	Any Analysis of Variance Test (ANOVA) is not applied because differences between groups of people are not determined and, in any event, there may be relationships between the respondents
The Pearson's Product Moment Correlation Coefficient	The Pearson's Product Moment Correlation Coefficient (PMCC) is not practical for this research because strengths of linear correlations of different data sets are not measured
The Mann-Whitney U Test	Finally, the Mann-Whitney U Test is not applied to this respondent data. This is because although the test is suitable to test small numbers for changes over time, this respondent data does not require small groups of people i.e. male versus female to be ranked and compared to locate differences created by chance.

Table 4.2: Statistical Hypothesis Tests

Nonetheless, most statisticians agree that a minimum sample size of 100 is needed to carry out any tests or modelling. Therefore, the researcher chose to carry out the analysis of the respondent data without the help of statistical software, tests and models and in any case, software would not be able to locate the new hypotheses the researcher is choosing to illuminate. Summaries of responses to the survey questions were collated together from both the English and Polish questionnaires (See Appendices 3.4 and 3.5), with survey response data located in Appendices 4.1 to 4.8.

Chapter 4 continues below with the Findings and Analysis of the 17 respondent questionnaires in English and Polish (Appendices 3.4 and 3.5) with survey questions and

subsequent discrete data. Survey questions are listed with explanations of the data supported by presentations of the data in pie charts, bar charts, frequency polygons and tables. The list of survey questions below, are followed with individual analyses of the data.

4.1.2.2 Questionnaire Survey Questions and collated Data

4.1.2.2.1 Survey Question 1

Seventeen respondents were asked how they travelled to the UK illustrated in Table 4.3. Seventeen respondents equal 100.00% (n: 17) and one respondent equals 5.88% (n: 1). Respondents were asked to tick the box next to the phrase which best suited their transport to the UK, i.e. if they travelled by plane, via car (own transport) or via bus. In response, the largest proportion of respondents totalling 59% (n: 10) travelled by plane, 29% (n: 5) travelled via car (own transport) and 12% (n: 2) travelled via bus.

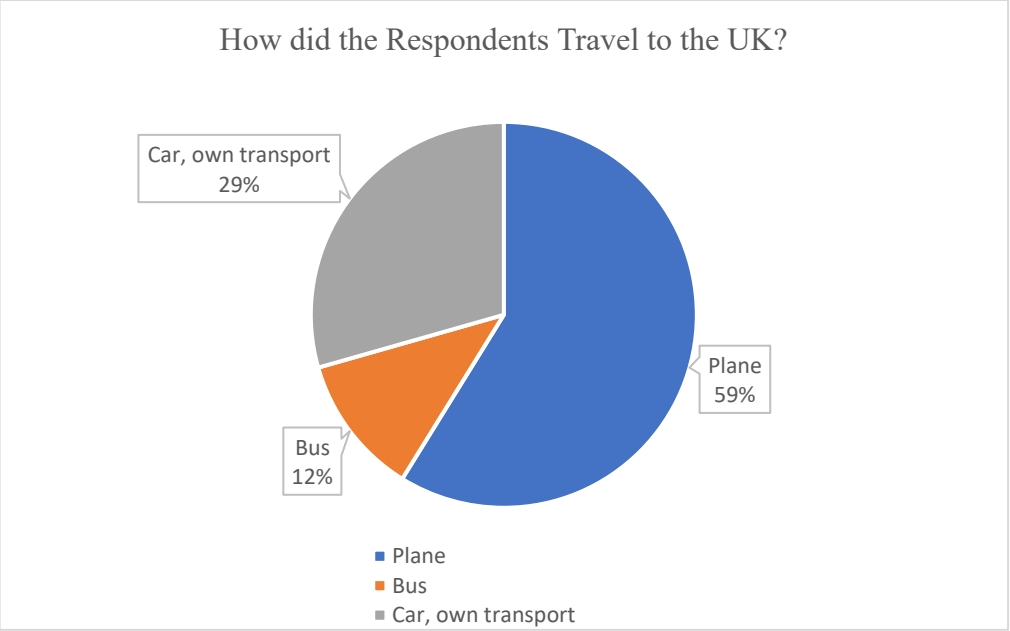

Table 4.3: How did the Respondents Travel to the UK?

4.1.2.2.2 Survey Question 2

Seventeen respondents were asked if they paid for their transport into the UK illustrated in Table 4.4 with 13 respondents providing a response. The largest proportion of respondents totalling 64.68% (n: 11) paid for their transport with five male respondents paying between £100 and £300 via plane. Some additional comments were provided whereby three respondents paid £100, one respondent paid £150 and one respondent paid £300. One female respondent paid £50 with a friend via car (own transport). The smallest proportion of respondents totalling 11.76% (n: 2) did not pay for their transport and 23.52% (n: 4) did not respond to the question.

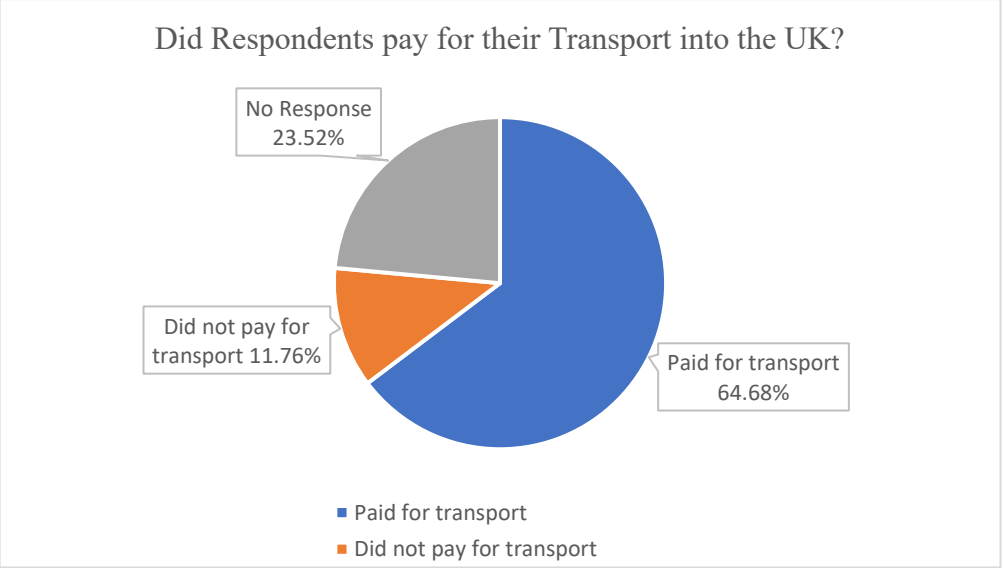

Table 4.4: Did Respondents pay for their Transport into the UK?

4.1.2.2.3 Survey Question 3

Seventeen respondents were asked about job offers, work and why they came to the UK. Respondents were provided with five categories next to five tick boxes. Table 4.5 provides an illustration of the categories in Survey Question 3. Categories include: if they came to the UK in response to a job offer in the EU from a recruitment agency/gangmaster, a job offer in the UK from a recruitment agency/gangmaster, came of their own accord to work, came with family to work or came with a friend to work. The largest proportion of respondents totalling 41.16% (n: 7) came of their own accord to work, 23.52% (n: 4) respondents came with family to work and 23.52% (n: 4) responded to a job offer in the EU from a recruitment agency/gangmaster. The smallest proportions both totalled 5.88% (n: 1) and represented two categories including: came with a friend to work and responded to a job offer in the UK from a recruitment agency/gangmaster.

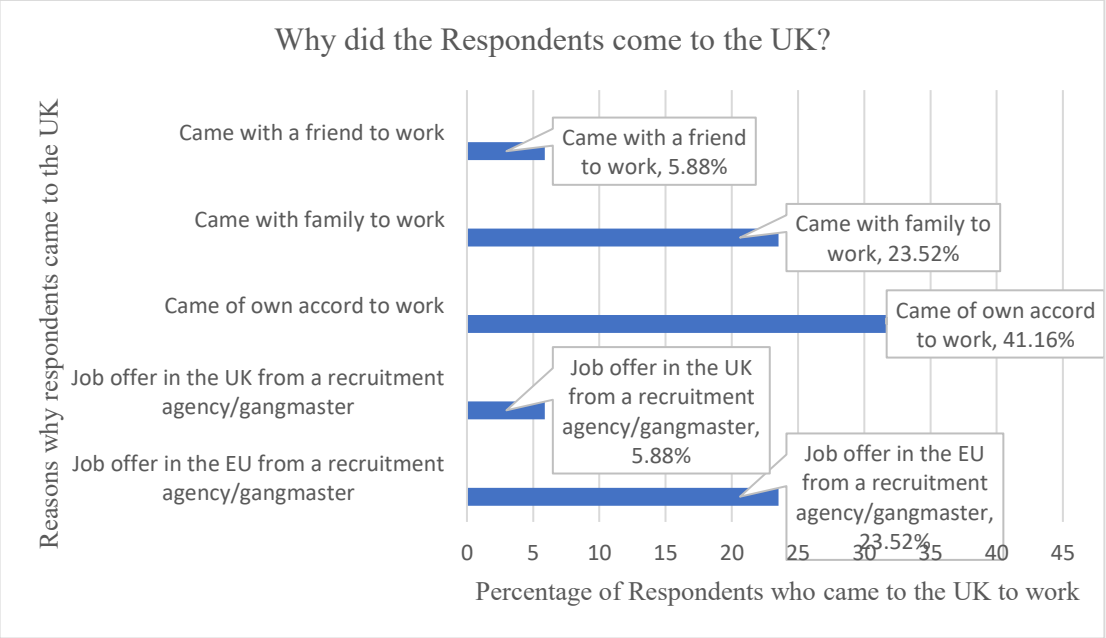

Table 4.5: Why did the Respondents come to the UK?

4.1.2.2.4 Survey Question 4

Seventeen respondents were asked, from arriving in the UK, how many jobs had the respondents had in the UK? The question received 16 responses. Survey Question 4 provides a summary illustrated in a bar chart as Table 4.6 that provides integers of respondents in relation to how many jobs they have had in the UK. Five respondents had one job, four respondents had two jobs, two respondents had three jobs, two respondents had four jobs, two respondents had more than four jobs, one respondent had six jobs, and one respondent did not respond to the survey question. Filip provided an additional comment whereby they wrote "I have been working for agencies, and they recruit only for peak time." Ten respondents had an average of two jobs and the remaining six respondents had an average of four jobs each.

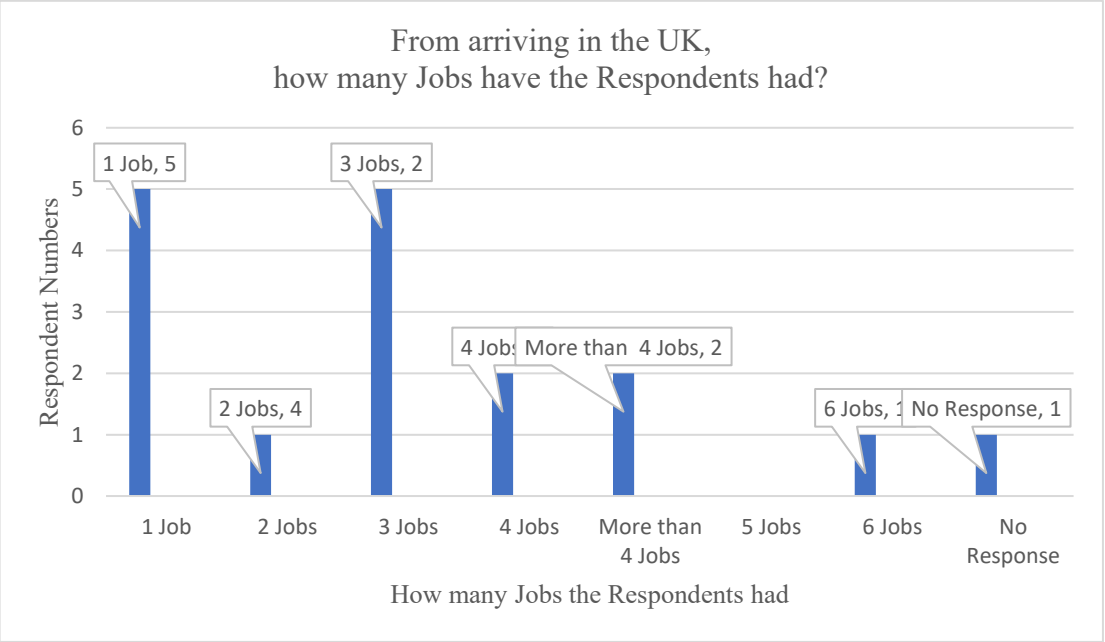

Table 4.6: From arriving in the UK, how many Jobs have the Respondents had?

4.1.2.2.5 Survey Question 5

Seventeen respondents were asked where they worked, and the question received 20 responses from 15 respondents. Two respondents had chosen not to respond to Survey Question 5, one respondent chose to provide half the required information and no respondents worked in agriculture. The following pie chart illustrated as Table 4.7 displays the 20 responses as a percentage with 5% equal to one response. Data is as follows: 45% (n: 9) responses confirmed the respondents worked in a food factory, 30% (n: 6) worked in a warehouse, 5% (n: 1) worked at a fast-food chain, 5% (n: 1) worked in a care home, 5% (n: 1) worked in a betting agency, 5% (n: 1) worked in a quarry, 5% (n: 1) worked in food.

This research is primarily about GLAA workers in food manufacturing and food processing; however, some respondents also confirm they have had deductions for transport from their licensed gangmaster to work in other areas. Two examples are Józef and Michal that have worked in the food sector but also other sectors including a quarry via licensed gangmasters Staffline and a warehouse and betting agency via either licensed gangmasters Blue Arrow, Flame Recruitment and Taskmaster Resources Ltd identified in Table 4.9, whereby both Staffline and Blue Arrow operate with government skills contracts, and Blue Arrow operates as an overseas gangmaster as part of RSS Global (2024) which is part of Twenty 20 Capital (2024) via Guernsey. Nonetheless, all response data is incorporated in this research because GLAA registered workers are confirmed as moving back and forth and between different GLAA sectors by their licensed gangmasters that operate in both licensed and unlicensed gangmaster sectors.

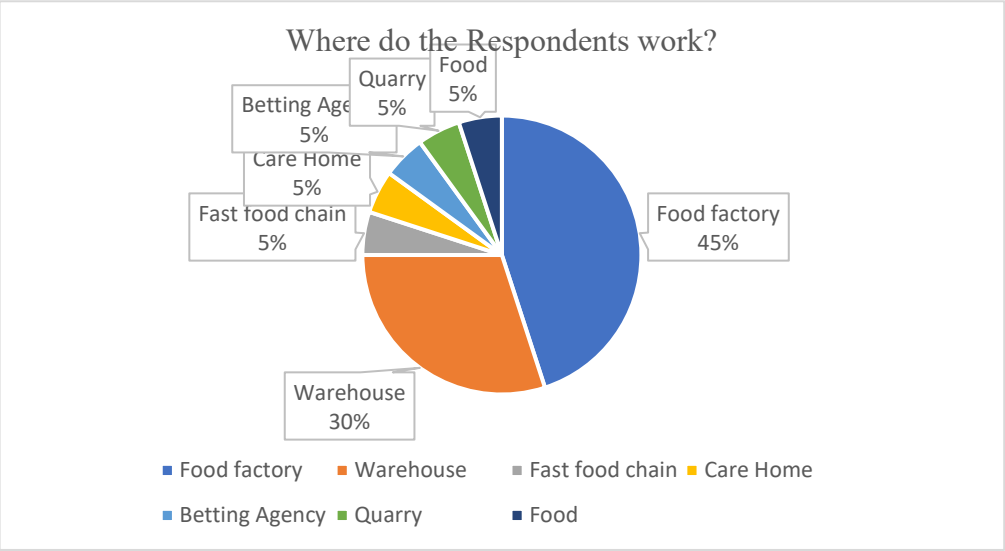

Table 4.7: Where do the Respondents work?

4.1.2.2.6 Survey Question 6

This question asked 17 respondents how they signed into the factory or work area. Table 4.8 provides a bar chart which presents integer data in relation to Survey Question 6. The largest number of respondents totalling 14 confirmed they clocked in and out of their work area, Josef, Michal and Magdelena confirmed they scanned in and out of their factory or work area, Michal and Stefan signed papers in and out, and Dariusz used a card or wore an AMT (Arm Mounted Terminal) to monitor their work performance, or a voice device or finger scanner. Michal and Stefan had signed into their work areas in two different ways including working in a food factory whereby they had clocked in and out and signed papers in and out. Michal worked in a food factory, warehouse and betting agency and had clocked in and out, signed papers in and out and scanned in and out. Jozef scanned in and out at a food factory and a quarry. Ryszard stated they had clocked in and out at Mitie, Tesco and Greencore for the Ambition agency in a "food factory for 16 years."

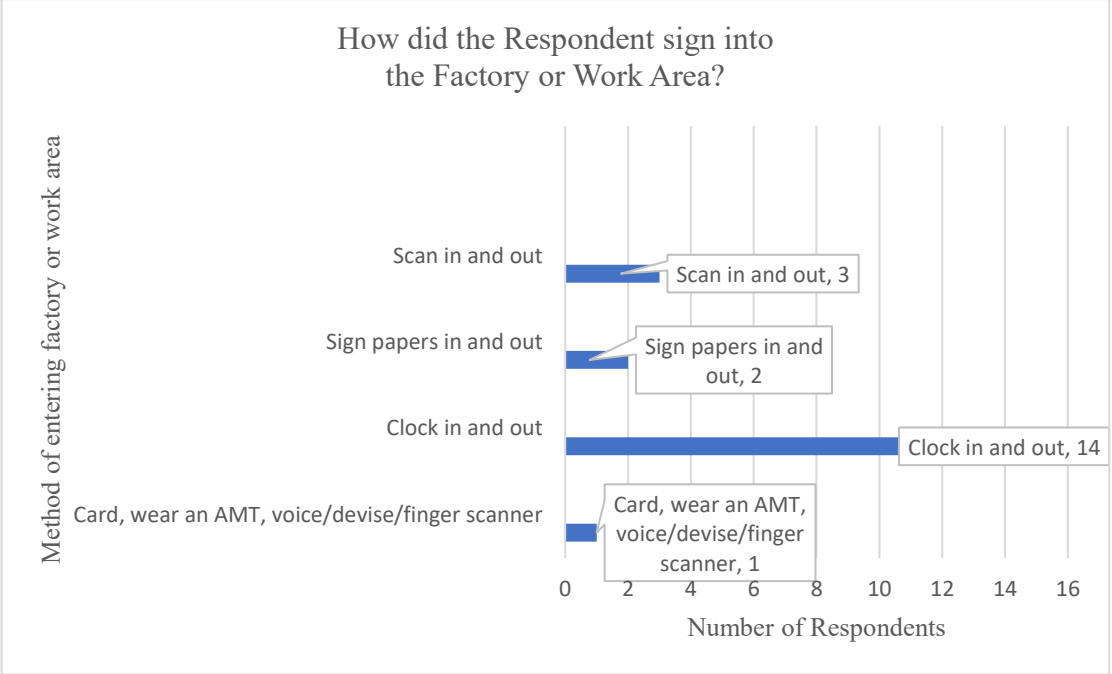

Table 4.8: How did the Respondent sign into the Factory or Work Area?

4.1.2.2.7 Survey Question 7

Seventeen respondents were asked if they could provide the name of the Recruitment Agency they worked for. Eleven respondents identified 16 different recruitment agencies/gangmasters which were then placed in Table 4.9. Six respondents did not respond to the question. Each recruitment agency/gangmaster in Table 4.9 is then searched for in the GLAA Public Register, for any different trading names, their location at Companies House, evidence of merging with other recruitment agencies/gangmasters as per GLA Brief 6 (GLA, 2010, June) and for any recruitment agency/gangmaster UK government partnerships and/or global partnerships. Gangmaster information retrieved from searches has been illustrated in Table 4.9.

Recruitment Agency/Gangmaster retrieved information from Searches					
Recruitment Agency/ Gangmaster	GLAA Public Register Yes/No UK nation labour is supplied to	Different Trading Name(s) registered at the GLAA	Companies House (SIC) Code	Evidence of gangmasters merging with other gangmasters as per GLA Brief 6 (GLA, 2010, June) Yes/No	Evidence of partnerships with UK government department Global partnerships
TR6	No	No	No	No	No
Challenge Workforce People Solution	Yes England; Scotland; Wales	No	78200 - Temporary employment agency activities	Yes	No
Mach Recruitment	Yes England	No	78200 - Temporary employment agency activities	No	No
Top Gear	No	No	78200 - Temporary employment agency activities Located: Dissolved	No	No
Cordant PMP TRG (Challenge-trg Group)	No No Yes England; Scotland; Wales	No No No	74990 - Non-trading company 78200 - Temporary employment agency activities No 78200 - Temporary employment agency activities	Yes	Part of: Twenty 20 Capital (2024) 70229 - Management consultancy activities other than financial management Part of: Twenty 20 Capital (2024) 70229 - Management consultancy activities other than financial management
Premier Personnel	No	No	78109 - Other activities of employment	No	No

			placement agencies Located: Dissolved		
1) Staffline Recruitment Ltd 2) Staffline Recruitment (NI) Ltd	Yes England; Scotland; Wales; Northern Ireland (The licence holder can operate across the UK) Yes, but identifies as "can operate across the UK"	Yes: Two other limited companies that are both Dormant SIC 99999 but, remained linked to its main business holder and subsidiary land transport companies 49390 - Other passenger land transport (Omega Resource Group; A La Carte with subsidiaries in Scotland e.g. Brightwork Ltd) Have not incorporated for example: SIC Code 85590 – Other education n.e.c. SIC Code 85600 – Educational support services	In 2024: 78109 - Other activities of employment placement agencies, and 78200 - Temporary employment agency activities Also, as part of a PLC registered as: 82990 - Other business support service activities not elsewhere classified In 2023: 78200 - Temporary employment agency activities	Yes	Yes: Staffline Group PLC Skills for Growth, PeoplePlus Training and Adult Education, Prison Education
Blue Arrow	Yes England; Scotland; Wales; Northern Ireland (The licence	Yes: 78200 - Temporary employment agency activities	Overseas entity (Guernsey) Governing law (Guernsey) Part of:	Yes	Yes: Department for Levelling Up Housing and Communities, DWP, Armed Forces Yes:

	holder can operate across the UK)		RSS Global (2024) 64209 - Activities of other holding companies not elsewhere classified (GOV.UK, 2025b) RSS Global (2024) is part of: Twenty 20 Capital (2024) 70229 - Management consultancy activities other than financial management		Part of: RSS Global (2024) operating across the UK, Ireland and Asia Pacific RSS Global (2024) is part of: Twenty 20 Capital (2024)
Flame Recruitment	No	No	To be provided on next annual return Located: Dissolved	Yes	No
Taskmaster Resources Ltd	Yes England; Scotland	No	78109 - Other activities of employment placement agencies	Yes	No
Ambition	No	No	70229 - Management consultancy activities other than financial management	No	
Samolotem (Translated via Google translation from Polish to English: "Aeroplane")	No	No	No	No	No
Komtrolce by Tom (Translated via Google	No	No	No	No	No

translation from Polish to English: "Controlled by Tom")					
Angel	Yes England	No	78109 - Other activities of employment placement agencies Located: Dissolved	No	No
Total	16 Recruitment Agencies/Gangmasters 7 in the GLAA Public Register 14 operating under different names to those identified at the GLAA 4 not listed at Companies House 9 not registered in the GLAA Public Register and therefore operating illegally in England include one registered as a finance company at Companies House with SIC Code 70229, two companies have merged together with two different SIC Codes 74990 as a non-trading company and the second as SIC Code 78200, three gangmasters were dissolved, two gangmasters were not registered anywhere in addition to two further gangmasters operating illegally that required Google translation services 2 supply labour to England 1 supplies labour to England and Scotland 2 supply labour to England, Scotland and Wales 2 supply labour to England, Scotland, Wales and Northern Ireland 1 supplies globally into the UK and Asia Pacific 1 operated but dissolved the following year				

Table 4.9: Recruitment Agency/Gangmaster retrieved information from Searches

4.1.2.2.7.1 GLAA Public Register

The bar chart illustrated in Table 4.10 below, provides the number of gangmasters identified by the 17 respondents including seven licensed gangmasters that were registered on the GLAA Public Register and nine gangmasters that were not registered on the GLAA Public Register. Four gangmasters were not registered on either the GLAA Public Register or at Companies House.

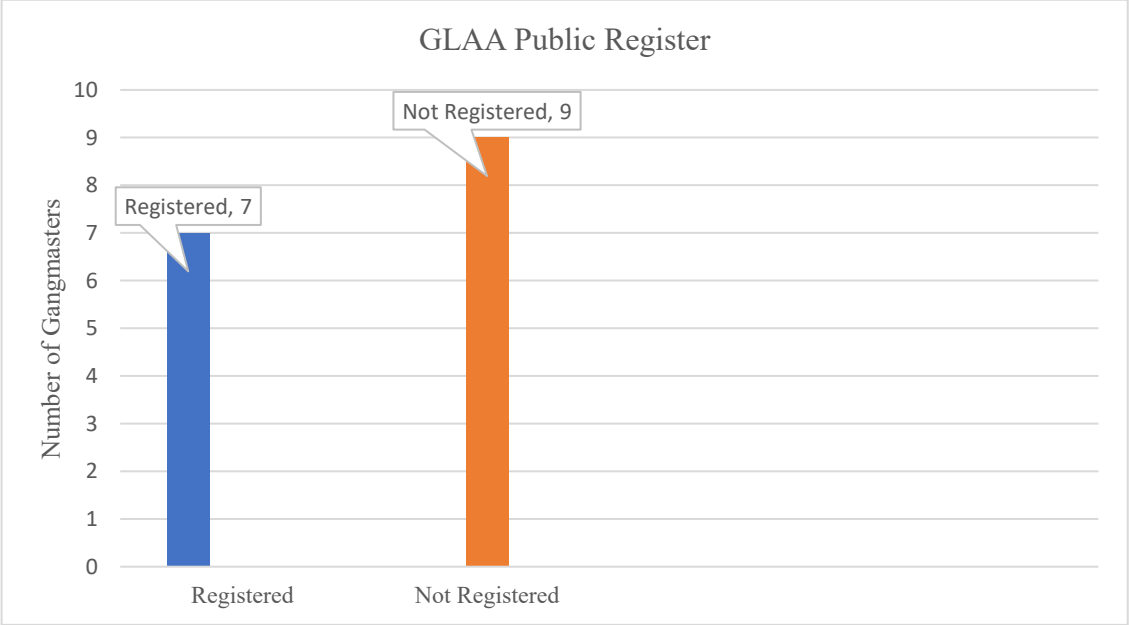

Table 4.10: GLAA Public Register

The following bar chart illustrated as Table 4.11 illustrates where the seven licensed gangmasters can operate which includes two licensed gangmasters that are able to operate in all four nations of the UK, two operate in England, Scotland and Wales, one operated in England and Scotland, one operated in England only and one operated in all four nations of the UK and globally into the Asia Pacific.

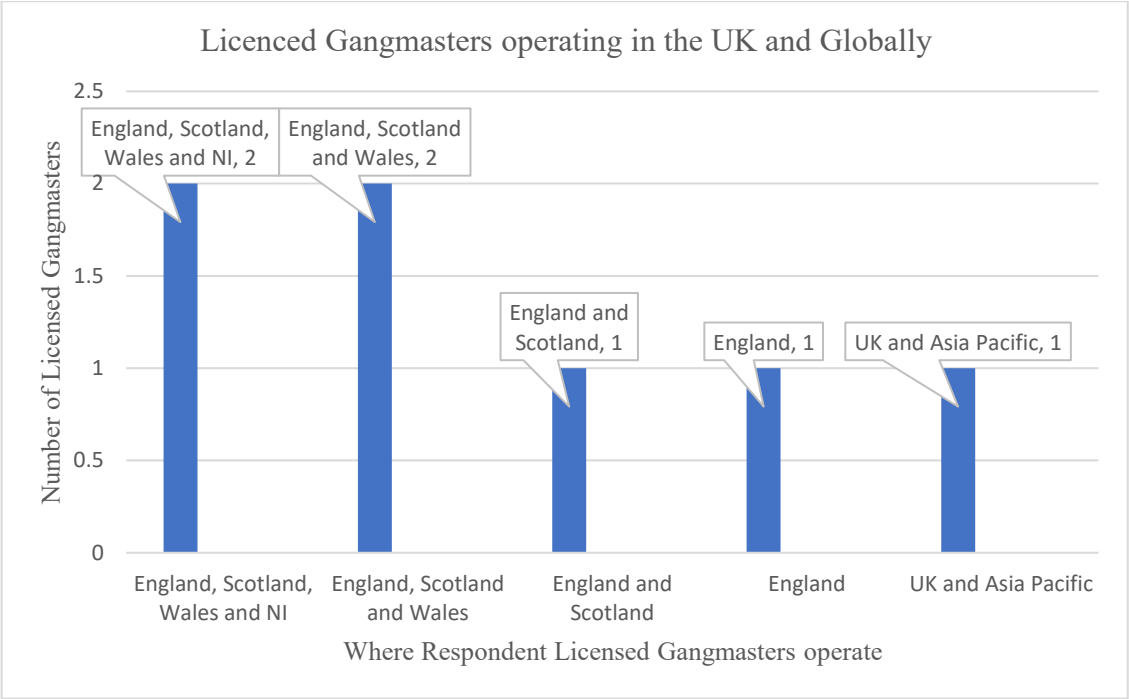

Table 4.11: Licensed Gangmasters operating in the UK and Globally

4.1.2.2.7.2 Companies House SIC Codes

Twelve recruitment agencies/gangmasters were identified and following an online search, 12 recruitment agencies/gangmasters were located at Companies House. A variety of SIC Codes were applied to identify if they were Dormant, non-Trading and/or to define their Gangmaster businesses. Seven SIC Codes in Table 4.12 provide the integers of recruitment agencies/gangmasters that apply their selected SIC Code. Guernsey law seems to supercede UK law and therefore no SIC Code was required.

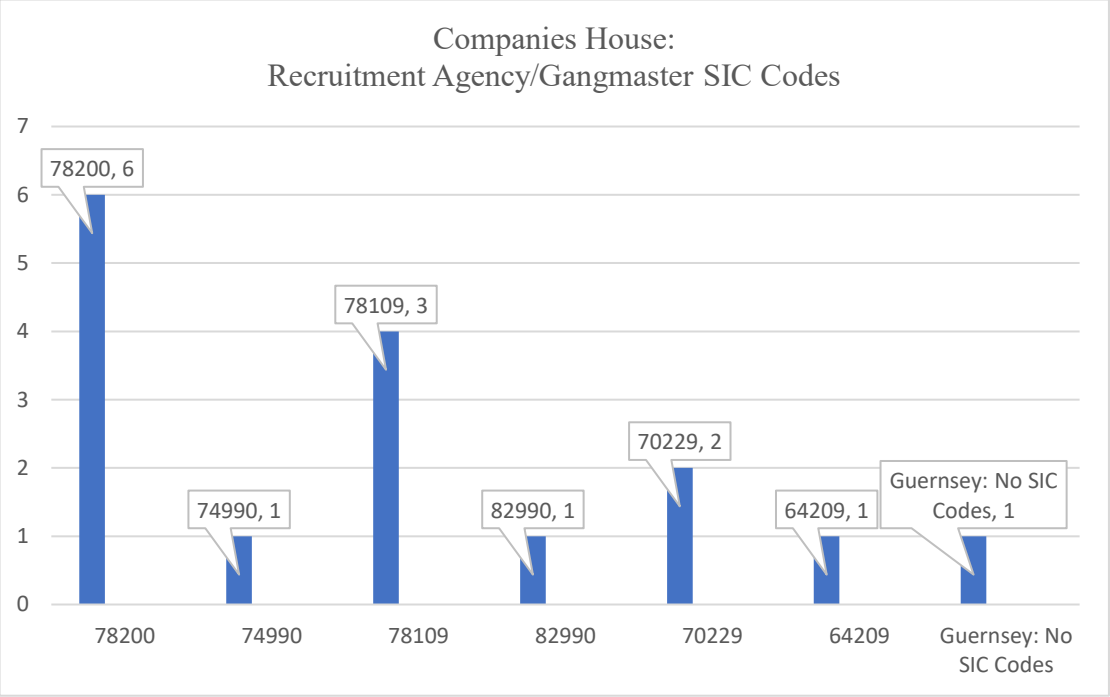

Table 4.12: Companies House: Recruitment Agency/Gangmaster SIC Codes

Three gangmasters applied SIC Code 78109 but two identified gangmasters were dissolved. Two gangmasters applied SIC Code 70229 and one gangmaster applied SIC Code 82990. Six gangmasters applied SIC Code 78200 of which one gangmaster was dissolved and one gangmaster merged with other gangmasters. A further gangmaster applied SIC Code 74990 but was identified as non-trading and one gangmaster applied SIC Code 64209. Four gangmasters did not apply a SIC Code of which one gangmaster without a SIC Code indicated it would provide its annual return before it was dissolved. One gangmaster was based in Guernsey and did not require a SIC Code.

Six gangmasters had previously merged with other gangmasters, seven gangmasters had not merged with other gangmasters and two gangmasters had operated under three different trading names.

One gangmaster known as Blue Arrow is part of RSS Global (2024) and is governed by Guernsey law which seems to supersede UK law. Blue Arrow operates across the UK, RoI and Asia Pacific and provides labour for the Department for Levelling Up Housing and Communities, the Armed Forces and the DWP.

4.1.2.2.7.3 Different Trading Name(s) Registered at the GLAA

Two licensed gangmasters had different trading names with Stafflines trading name listed as Dormant at Companies House. However, links remain to its parent company, unlicensed gangmasters and other land transport companies.

4.1.2.2.7.4 Evidence of Gangmasters merging with other Gangmasters as per GLA Brief 6

The GLAA Public Register provides evidence of six licensed gangmasters merging with other gangmasters which include Challenge Workforce People Solutions, Cordant, Staffline, Blue Arrow, Flame Recruitment and Taskmaster Resources Ltd. The GLAA Public Register does not provide evidence of recruitment agencies/gangmasters that have partnered with UK government departments and/or any global partnerships. However, an online search provided information with regard to Staffline and Blue Arrow that have partnerships with the UK government. Additional on-line searches provide information about three gangmasters: Cordant, PMP and Blue Arrow that have global partnerships into the "Human Capital Services Sector" featured by Twenty 20 Capital (2024) and collected from the non-Financial Services business economy for the Financial Services Sector (ONS, 2018, November 8).

4.1.2.2.8 Survey Question 8

Seventeen respondents were asked what sort of work contract they had signed with their recruitment agency. In response, Table 4.13 illustrates the respondents and how they responded to Survey Question 8. Nine respondents confirmed their contracts were a CoE, seven respondents wrote on the survey they had a CFS which is a ZHC, and one respondent had a ZHC which indicates just one worker is in precarious work.

Respondents therefore total nine respondents (52.92%) with a CoE and a total of eight respondents (47.04%) working from a CFS/ZHC or ZHC.

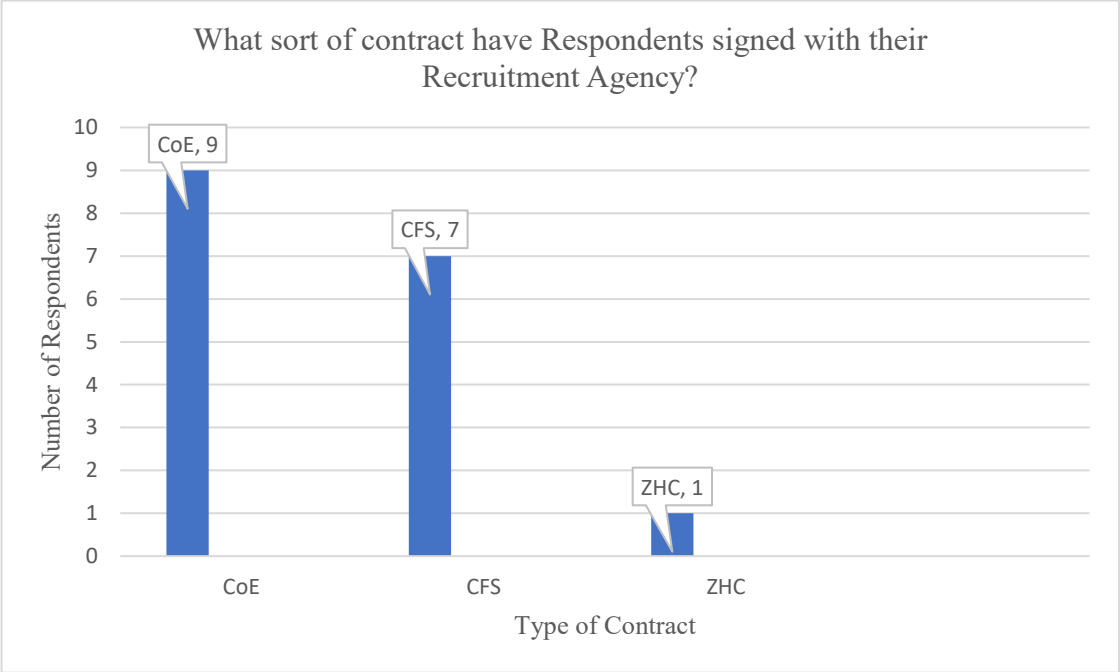

Table 4.13: What sort of contract have Respondents signed with their Recruitment Agency?

Table 4.14 provides a frequency polygon which illustrates one respondent on a ZHC, seven respondents on a CFS with a positive skew towards nine respondents on a CoE.

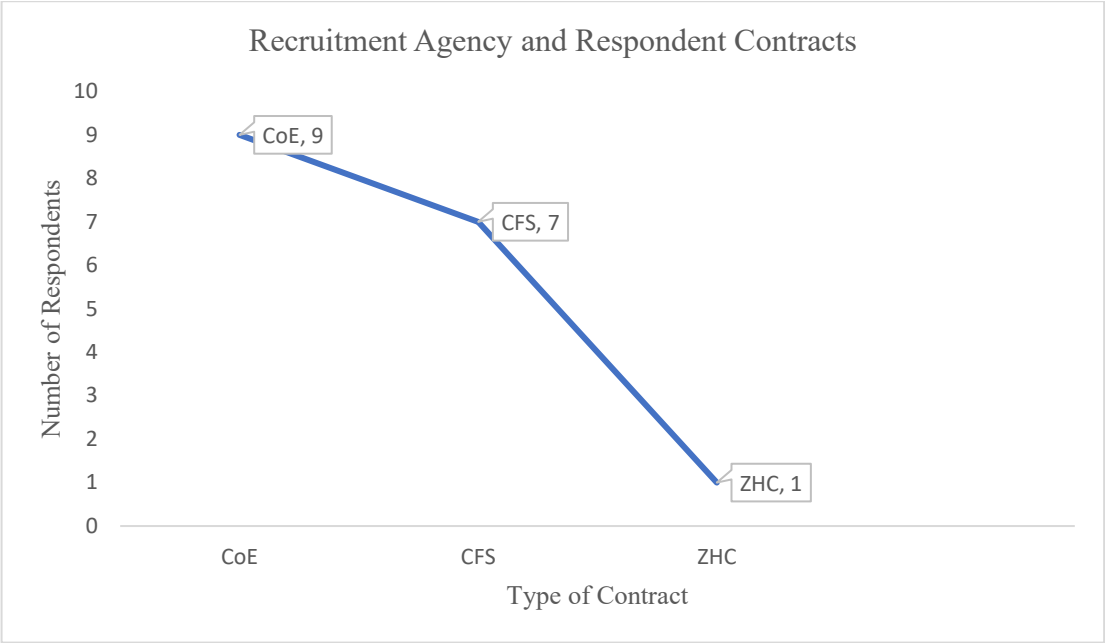

Table 4.14: Recruitment Agency and Respondent Contracts

To illustrate 17 worker respondents as employees in ONS data as per the EAA1973 s.13(1.a), Table 4.14 data is illustrated in Table 4.15 as a pie chart, that shows nine worker respondents on a CoE added to seven worker respondents on a CFS totalling 94.08% (n: 16) respondents, with 5.88% (n: 1) respondent on a ZHC.

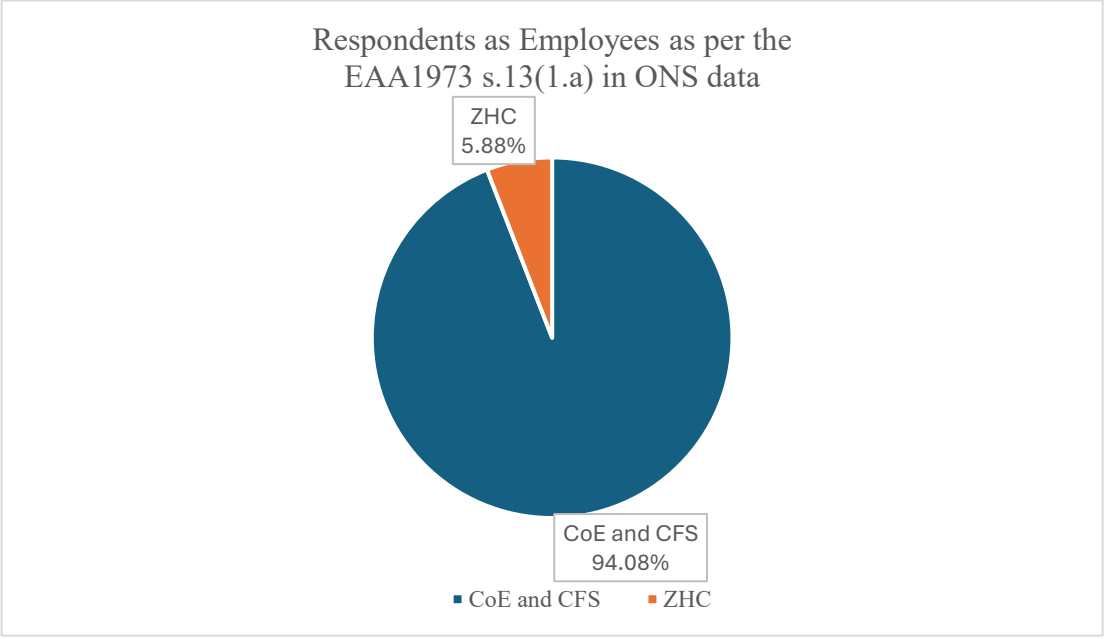

Table 4.15: Respondents as Employees as per the EAA1973 s.13(1.a) in ONS Data

4.1.2.2.9 Survey Question 9

Due to changes made to the thesis research questions, this question and any responses in relation to training have been excluded from this research.

4.1.2.2.10 Survey Question 10

Seventeen respondents were asked how they received their payslip with just one providing no response. The remaining 16 respondents in the table below (Table 4.16) provide the percentages of respondents that confirmed how they received their payslip including 47.04% (n: 8) that received their payslip via email, 17.64% (n: 3) received theirs via email and hand, 11.76% (n: 2) received their payslip via email and post, with 5.88% (n: 1) receiving theirs via hand, although [Piotr and Magdalena] (11.76%, n: 2) wrote "application" on their questionnaires and 5.88% (n: 1) Sysmon provided no response. Some information provided by Piotr is conflicting and unclear, with information discussed later in Appendix 4.2.

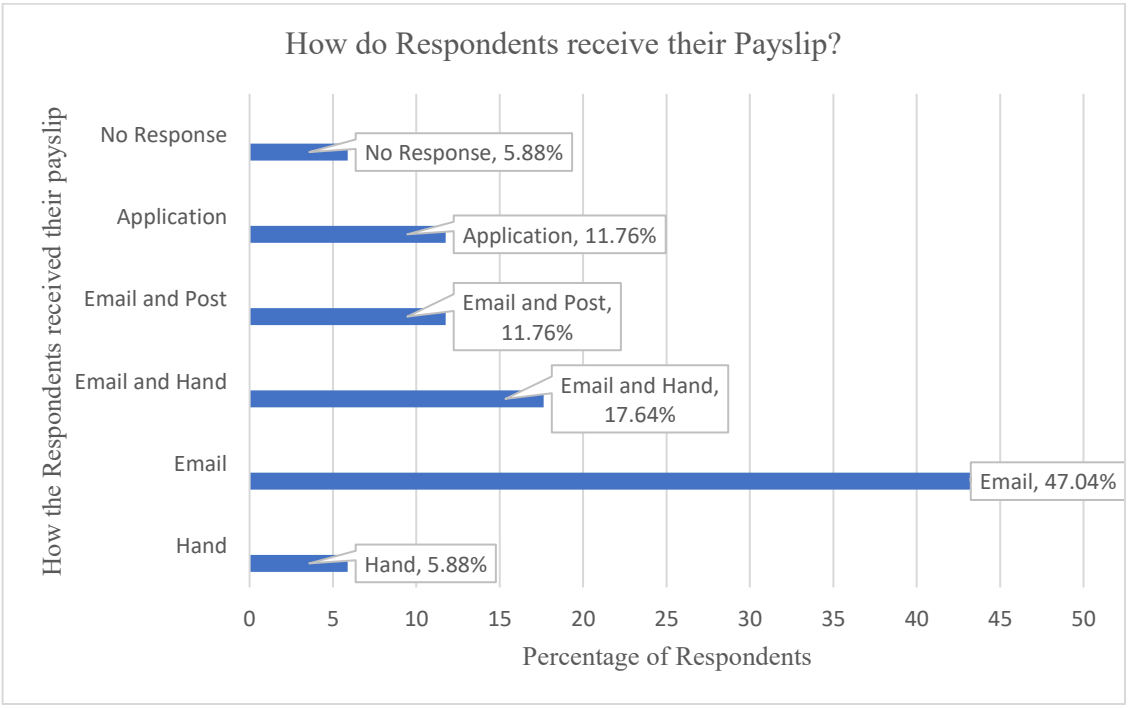

Table 4.16: How do Respondents receive their Payslip?

4.1.2.2.11 Survey Question 11

This question asked the 17 respondents if they recorded any deductions from their payslips, and if so, how much did they pay and what did they pay for. Table 4.17 illustrates twelve respondents whereby they confirm they had no deductions from their payslips, four respondents had deductions, and one respondent chose not to respond to the question. Four respondents provided further details of their deductions.

Respondent pseudonym	Deductions from Weekly Pay	Paid for by Respondents
Dariusz	Travel: £25 p.w. Accommodation: £85 p.w. 20 people share a room Did not pay NIC	Disclosure and Barring Service (DBS): £45 p.w. Safety shoes
Filip	No	No Response
Jakub	No Response	No Response
Jan	No	No Response
Józef	No	No
Michal	Transport: £30 for 3 months Accommodation for 3 months	Yes
Piotr	No	No
Ryszard	Transport	No Response
Stefan	No	No Response
Szymon	No	No
Anna	No	No
Halina	No	No Response
Karolina	No	No Response
Magdalena	No	No
Róża	No	No
Tekla	No	No
Zofia	Transport: £40 p.w.	No

Table 4.17: Respondent Deductions from their Weekly Pay

Table 4.17 provides data from Table 4.14 of nine respondents that confirmed they worked from a CoE, and seven respondents that had confirmed they have a CFS or a ZHC. However, two respondents with a CoE both have deductions for transport costs from their emailed payslips. Michal stated two comments, “transport £30 for 3 months” and “accommodation for 3 months” and Zofia stated a deduction for transport at “£40 p.w.”

Payslips issued to respondents working from a CoE were either emailed or delivered by hand.

Dariusz on a CFS confirmed deductions for travel of "£25 p.w." and accommodation of "£85 p.w." whereby he shared a room stating: "20 people share a room" for the warehouse job. Further deductions include a DBS (Disclosure and Barring Service) check at "£45" with additional confirmation whereby they confirmed they did not pay NIC. Dariusz had confirmed working 24 hours in one week in a warehouse. Deducting £110 for accommodation and travel took Dariusz below the NMW threshold. (The researcher has not deducted £45 for a DBS check because it is not clear if this was a deduction from another job in a care home).

Dariusz on a CFS wrote they had a "six hours contract," Jakub wrote they worked "7.5 hours p.w." and Piotr on a ZHC wrote their contract was for "13 hours p.w."

4.1.2.2.12 Survey Question 12

Seventeen respondents included five respondents via three translators that wrote a variety of comments illustrated in Table 4.18 which asked them about their most common work problems. Tick boxes provided problems as categories which included if respondents were paid the UK hourly rate of the NMW/NLW, if they were paid holiday pay and whether they had regular work hours.

Respondents were asked if they were paid the UK hourly rate i.e. NMW or NLW. Survey Question 12 received a low response: 15 respondents (88.20%) did not respond to the question with two respondents (11.76%) confirming they were not paid the hourly rate i.e. NMW/NLW. The survey did not ask respondents what they were actually paid by their gangmasters, and this information was not offered by the respondents. Fourteen respondents (82.32%) did not respond if they were paid holiday pay, but three respondents (17.64%) confirmed they were not paid holiday pay. Finally, eleven respondents (64.68%) provided no response to whether they were given regular hours each week, but six respondents (35.28%) confirmed they were not given regular hours each week. However, this information is provided in more detail in Survey Question 13.

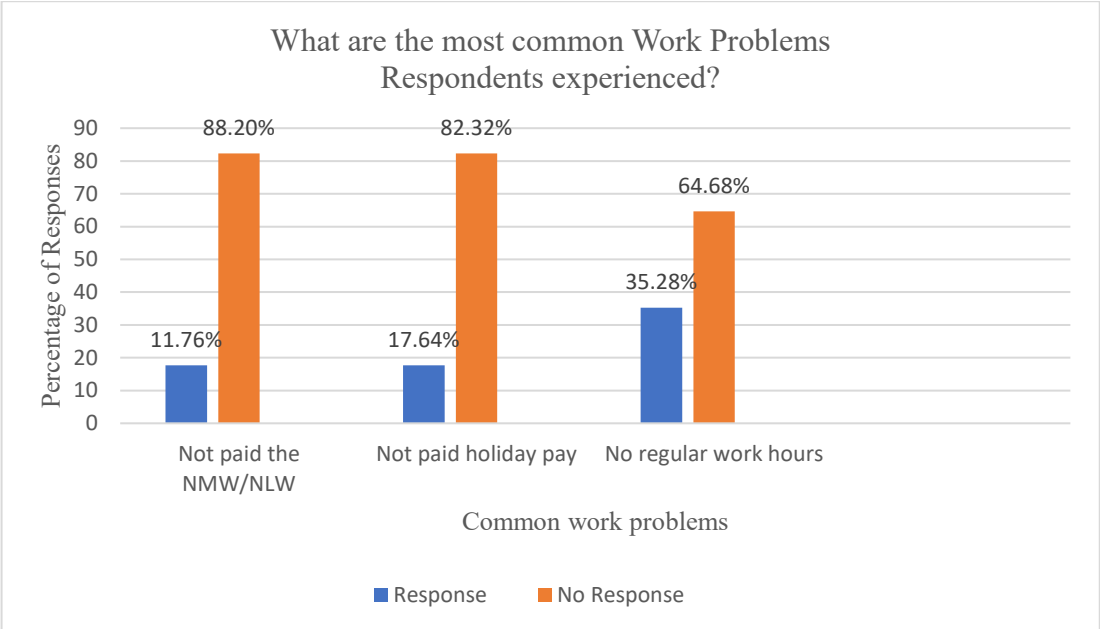

Table 4.18: What are the most common Work Problems Respondents experienced?

In relation to Survey Question 12, respondents wrote seventeen additional comments that have been made clear by the researcher in Appendix 4.5.

4.1.2.2.13 Survey Question 13

This question asked respondents that are equal to 100.00% (n: 17) and one respondent is equal to 5.88% (n: 1), how many hours each respondent worked each week, providing five different tick boxes with five different categories: up to 10 hours p.w., 10 - 20 hours p.w., 20 - 30 hours p.w., 30 - 40 hours p.w. and more than 40 hours p.w. Survey Question 13 received fifteen responses and two respondents provided no response. Five respondents however provided more than one answer as shown below in the bar chart illustrated as Table 4.19. A total of 23 responses have been allocated to the bar chart below.

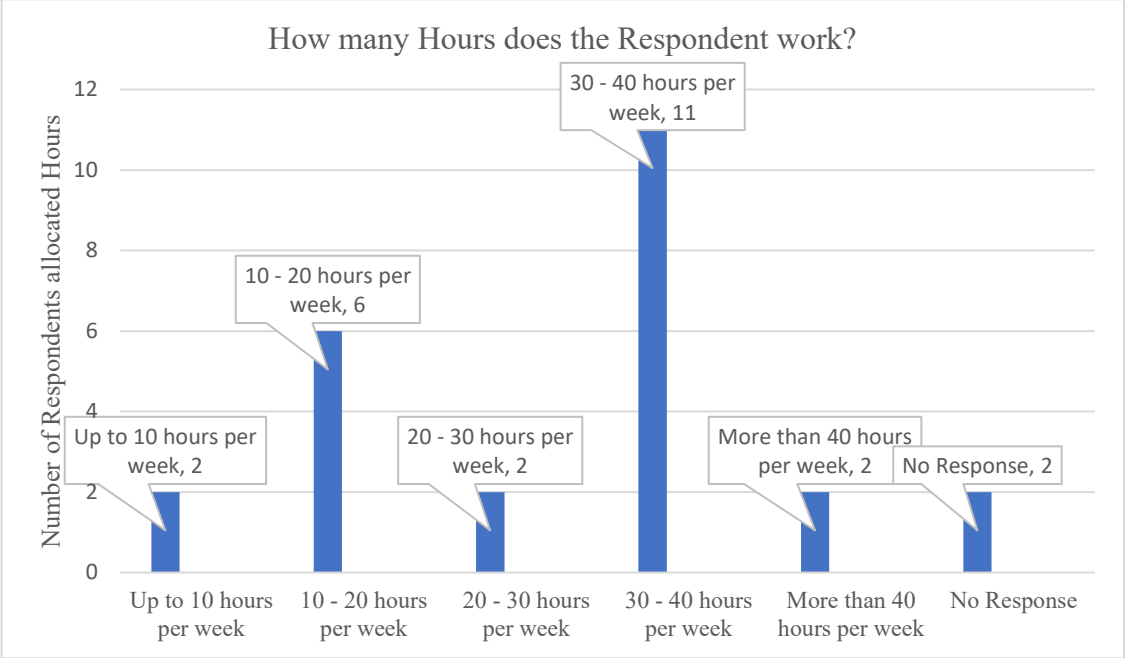

Table 4.19: How many Hours does the Respondent work?

4.1.2.2.14 Survey Question 14

Seventeen respondents were asked if they had any Rest Breaks at work with two tick boxes for Yes or No, with an area for respondents to write any comments. Fifteen respondents acknowledged Yes, they did get a rest break at work, one respondent confirmed they did not get a rest break, and one respondent did not respond to the question.

Nonetheless, Survey Question 14 had provided an area for respondents to comment. Comments are thus provided in Table 4.20 which illustrates comments from ten

respondents. Nine respondents acknowledged breaks ranging from one 15 minute rest break to one 30 minute rest break. One rest break affected Darius's AMT that reported poor performance whereby they felt threatened to take a break, and Jakub highlighted how their gangmaster coordinator stood in the canteen doorway preventing Jakub from taking their break.

The remaining seven respondents acknowledged a rest break, but they did not provide the length of time or how often they had their rest breaks.

Respondent Rest Breaks			
Respondent pseudonym	Yes	No	How long are Respondent Rest Breaks?
Dariusz	✔		Theoretically yes, but if I go on my break my performance went down, AMT drops performance if take a break, not take breaks as performance drops even if paid, may no work following day
Filip	✔		Half hour
Jakub	✔		2 x 15 min and 30 min lunch break. In the past coordinator was standing in the canteen door and didn't let pass the door for low performance
Jan	✔		
Józef	✔		
Michal	✔		
Piotr		✔	15 minutes
Ryszard	✔		
Stefan	✔		15 and 30 minutes
Szymon	✔		
Anna	✔		
Halina	No Response		
Karolina	✔		15 and 30 minutes
Magdalena	✔		30 min
Róża	✔		
Tekla	✔		2 x 15 mins and 30 mins lunch break
Zofia	✔		30 minutes first, 15 minutes second
Total	15 1 No Response	1	9 comments

Table 4.20: Respondent Rest Breaks

4.1.2.2.15 Survey Question 15

Table 4.21 below provides the 17 respondents with pseudonym names that were asked if they had any problems at work and if so, who would they approach to assist them with their work problems.

Seven respondents asked for help, with Michel asking for help from a support charity and six respondents asked for help from their recruitment agency. Filip was one of the six respondents who asked for assistance from their recruitment agency. Filip asked their recruitment agency for payment for their work at a food factory because they had forgotten to pay him adding, that when they were ill, their family in Poland sent them money to live on because the UK only pays £90 p.w. SSP if you are ill, which is not like in Poland where they pay 80% SSP.

Seven respondents did not approach anyone for assistance with help, although one of the seven respondents known as Zofia wrote they asked one single manager for help. Three respondents did not respond to the question.

Who do Respondents approach for assistance with work problems				
Respondent pseudonym	Support Charity	Recruitment Agency	No-one	Other (Please specify)
Dariusz			✔	
Filip		✔		Only call when they need you 2 - 3 agencies at a time UK is like America: if you break your leg, no help, no sick pay In Poland 80% pay, in UK £ 90.00 p.w. Was ill for one month, family sent money to live on Recruitment agency forgot to pay frequently at a food factory
Jakub		✔		
Jan		✔		
Józef		✔		
Michal		✔		Citizen Advice Bureau
Piotr	✔			
Ryszard	No Response			
Stefan			✔	
Szymon			✔	
Anna	No Response			
Halina			✔	
Karolina			✔	
Magdalena	No Response			
Róża			✔	
Tekla		✔		
Zofia			✔	Manager
Total	1 3 No Response	6	7	3

Table 4.21: Who do Respondents approach for assistance with work problems

4.1.2.2.16 Survey Question 16

Due to changes made to the thesis research questions in subcategory 1.2.2, this question and any responses in relation to the coronavirus pandemic have been excluded from this research.

4.1.2.2.17 Survey Question 17

Seventeen respondents were asked if they had heard of the Gangmasters and Labour Abuse Authority.

Responses were changed to percentages and applied to a bar chart illustrated in Table 4.22. Approximately 94.08% (n: 16) respondents confirmed they had not heard of the GLAA and 5.88% (n: 1) and one respondent known as Dariusz confirmed that they had heard of the GLAA because they wrote on their survey they had seen "signs in Birmingham for farm worker."

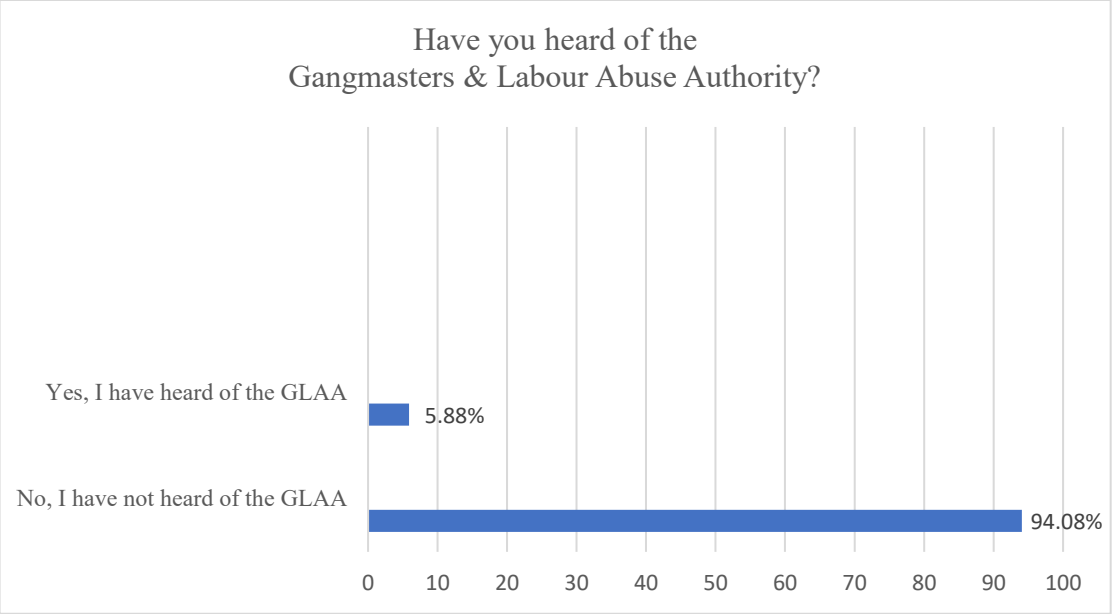

Table 4.22: Have you heard of the Gangmasters & Labour Abuse Authority?

4.1.2.2.18 Survey Question 18

The survey concluded by asking the 17 respondents if they were a member of a UK Trade Union that could help them in confidence with problems at work. The question provided two tick boxes: Yes or No. Table 4.23 provides a bar chart that illustrates responses with the largest portion totalling 12 respondents that confirmed they were not members of a UK Trade Union that could assist them in confidence with problems at work, four respondents were already members of a UK Trade Union, and one respondent did not respond to the question. The four respondents that indicated they were members of a trade union included Dariusz who was a member of Unite the Union, Filip who was a member of the GMB union, with Szymon and Anna indicating they were members of unions although both respondents did not confirm where they worked because Anna worked for the gangmasters Angel who were a dissolved company (Table 4.9), and Szymon worked via illegal gangmasters whereby they were "controlled by Tom" (Table 4.9).

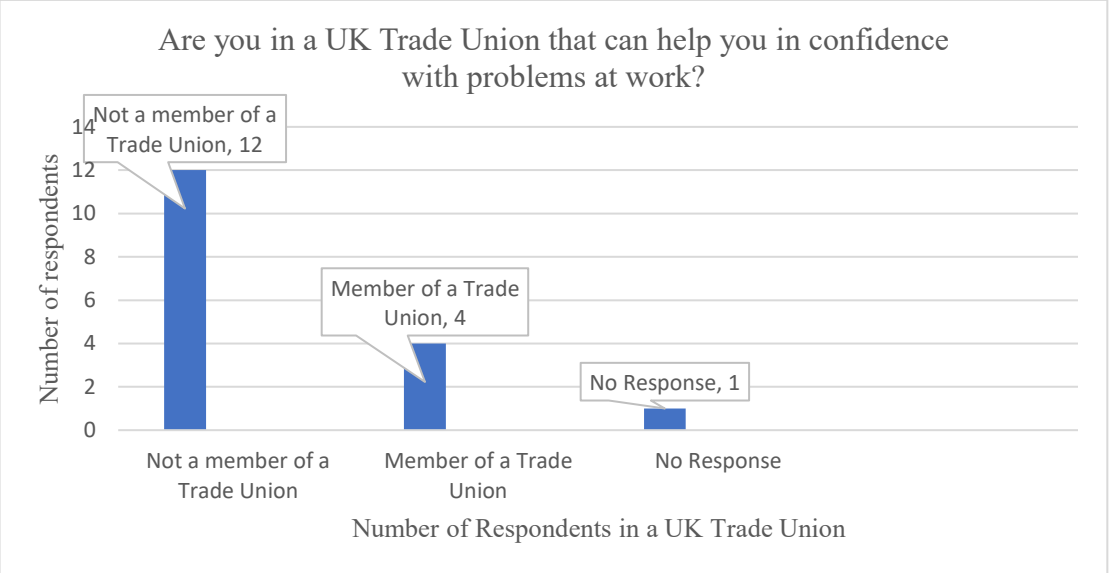

Table 4.23: Are you in a UK Trade Union that can help you in confidence with problems at work?

Respondent data in subcategory 4.1.2.2.18 confirms 12 respondents were not members of a trade union with subcategory 4.1.2.2.19 confirming the respondents had no knowledge of how to join a trade union and had been provided with no literature as to how to do so.

4.1.2.2.19 Survey Question 19

The bar chart illustrated in Table 4.24 provides total respondent data to Survey Question 19, which asked 17 respondents if they would like to join a UK Trade Union to assist them with issues at work. Nine respondents confirmed they did not want to join a UK Trade Union, four respondents did not respond to the question and the remaining four respondents known as Filip, Jozef, Syzmon and Tekla confirmed they did want to join a UK Trade Union. Survey Question 19 responses do not tally with Survey Question 18 responses because for example, Szymon and Anna confirmed they were members of trade unions, but Szymon indicated they would like to join a trade union with no response from Anna.

In any case, any worker can join a trade union, however, should a worker locate the GLAA website, the website does not provide clear guidance to GLAA registered workers of how to join a UK Trade Union.

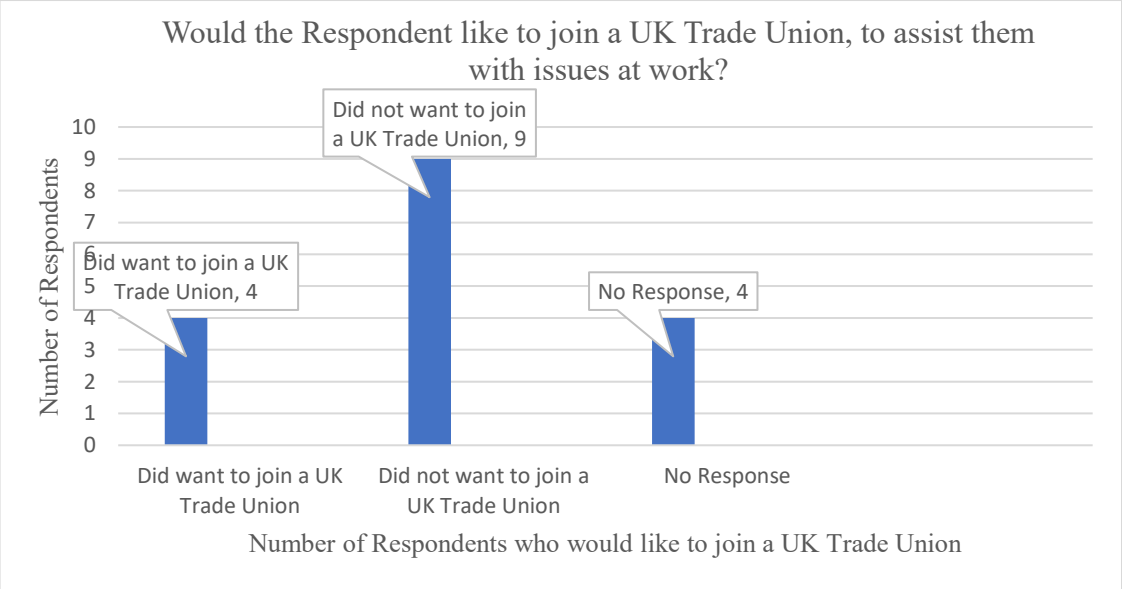

Table 4.24: Would the Respondent like to join a UK Trade Union, to assist them with issues at work?

4.1.2.2.20 Survey Question 20

The survey concluded by asking all respondents if there was anything the researcher could help them with, and, or if there was anything the respondents would like to share with the researcher by writing any additional comments on the survey. Only two comments were provided:

Dariusz wrote that they were a member of "Unite the Union, after disciplinary helped another agency worker."

Filip wrote they had "worked in Asda warehouse. I quit because of racism and if employee is foreign only lift heavy items for eight hours, now at Amazon and member of GMB Union." Filip has been analysed separately in Appendix 4.2.

4.1.3 Phase 3: Findings of Participant Data

4.1.3.1 Introduction

The concurrent mixed methods analytical research framework utilised an inductive approach to the researcher's ideas, including CDA with themes linked to coded extracts.

As part of the flexible thematic analysis, outcomes as propositions and any new themes and relationships within themes are now tested to provide pattern matching, with explanations prior to ideas in the original three Research Questions and Research Objectives. Based on ideas in the Literature Review, outcomes are tested with rigour, with analytic induction testing explanations by sorting through them to establish unobserved events as observable. Critical Discourse Analysis is used as one approach to look at the setting of the HO led GLAA, its governance and power relations, processes, events and practises including GLAA literature for example CRG, Briefs and the HO led GLAAs opaque relationships between its stakeholders, as the researcher reveals distinctions "between the natural world and the social world" (Fairclough, 2010, p. 680). To help with this approach, Figure 4.1 illustrates the researcher's GLAA CDA Framework that is a development of the Three-Dimensional Conception of Discourse in Fairclough (1992, p. 73).

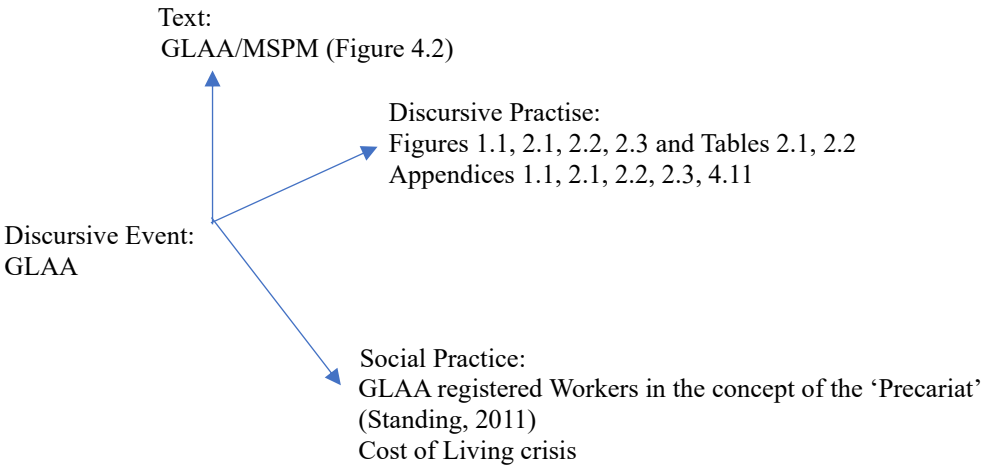

Figure 4.1. GLAA CDA Framework (Fairclough, 1992, p. 73)

Critical Discourse Analysis provides a critical understanding of social practices and dominant relationships, that have led to practices and some language by powerful stakeholders in text to dominate, leading to the "historical contextual development" (Saunders et al., 2019, p. 678) of the formation of the HO led GLAA as a platform for licensed gangmasters, as rising prices linked to sub-inflationary wage growth and the application of a CFS in any MSP Models (Figure 4.2) would fuel discontent and ignite a Cost of Living crisis.

The researcher understands the licensed gangmaster sector, and this helped the researcher identify themes to piece data together as per the following subcategories and Appendix 4.9.

4.1.3.2 Semi-structured Interviews and Group Interview

4.1.3.2.1 Coding and Sourcebook to Themes

As the researcher became familiar with the data, themes were searched for, coded and identified, for example 'priory codes' such as Technical Issues linked to GLAA CRG, linked to DEFRA Analysis, linked to Deductions, linked to Transport for example Data Code: TECH/CRG/DEF/DED/TRAN, and 'in vivo' codes such as a CFS is a ZHC, but is also identified as a CFS Model and as the researcher's realistic concept known as Figure 2.3, with themes and sub themes, relationships and key concepts that showed what is important and how they are related for example, historical relationships and enforcement decisions made between GLAA board members to trade associations, the LPC and

Directors of Licensed Gangmaster Businesses. Some themes are listed with arrows to linked categories in Appendix 4.9 which illustrates the researcher's Participant Data Coding and Sourcebook to Themes, followed by Coded Participant Data.

All themes with categories and codes are relative to the original three Research Questions and Research Objectives. Themes for example neoliberalism, technical issues and legal deductions will unite during thematic analysis.

Verbal data from semi-structured interviews and a group interview have been collated together via audio recording and then transcribed into textual data from a total of six participants illustrated with five code names in Table 3.1. Participant interpretations are not constructed but have been shaped by political discourse with capitalist activity for labour market flexibility.

The researcher's qualitative analysis technique relates to the methodological and philosophical basis of the research, its theory development and analytical approach. This flexible approach was taken to reduce raw participant textual data from the semi-structured interviews and group interview to transcript summaries in tables. Tables were then formalised and summarised, with data displayed as a sourcebook that is thus manageable and conversant with themes in the Literature Review (Miles et al., 2014). Appendix 4.9 illustrates the Participant Data Coding and Sourcebook to Themes that were developed deductively, then inductively as data became familiar with subcategories and codes. This helped identify themes in the transcript summaries that relate to the Research Questions.

To assist the reader, Appendix 4.9 also provides the Research Objectives, the Literature Review chapters and their subsequent category and codes in relation to themes that correlate to the initial three Research Questions and Literature Review.

4.1.3.2.2 Stakeholder Participants: Questions and Response Data

This is a new research topic, and some themes of the topic are new and difficult to understand, therefore, to assist the reader, the researcher provides participant data supplemented in some areas by respondent data in a story setting, thus guiding the reader through some themes set out in Appendix 4.9.

This research provides new topics of interest and has been guided by the researcher's critical realism framework, experience and reflexive analysis. Therefore, participant

transcripts were coded and then coded data was merged together. In relation to participant coded data, Appendix 4.9 displays Data Codes and their Themes. Participant coding helped locate the themes that follow in subchapters 4.1.3.2.3, 4.1.3.2.4 and 4.1.3.2.5.

For over five decades following Heaths EAA1973, UK legislation has been adapted to provide for the free movement of labour, leading to the creation of the GLA and the HO led GLAA from 2014 (Home Office/GLAA, 2018, August, p. 5) with the application of legislation including the Modern Slavery Act 2015 and Immigration Act 2016.

To assist readers with the following subchapters 4.1.3.2.3, 4.1.3.2.4 and 4.1.3.2.5 and thematic analyses, the researcher provides Figure 4.2 as the researcher's realistic model that includes primary data from the REC and ALP in relation to their dominant CFS Model, MSP Model and potential Core and Periphery Models identified in Table 4.25, combined with historical data and the researcher's observations, events and experiences. Figure 4.2 also incorporates the researcher's realistic concept of a CFS Model illustrated as Figure 2.3 that draws together GLAA text and discursive and social practise as per the GLAA as the Discursive Event in the researcher's GLAA CDA Framework as Figure 4.1 (Fairclough, 1992, p. 73), with additional text from throughout Chapter 2 the Literature Review, that supports the researcher's realistic model of any GLAA licensed gangmaster paymaster Managed Services Provider/Programme Model (GLAA/MSPM), highlighted by the REC in Table 4.25.

Figure 4.2 is thus placed near the beginning of Chapter 4, and subsequent Chapters 5 and 6, to provide the reader with an understanding of data identified above, and data then collated together.

Throughout the remainder of this research study, the term Figure 4.2 will be applied in the text to provide an explanation of critical realism with amalgamated legislation, data, text and discursive and social practise.

Therefore, it is important for the reader to note that Figure 4.2 is a realistic model designed by the researcher to assist the reader with new understandings of the GLAA and workers in their remit.

Figure 4.2 is followed by subchapter 4.1.3.2.3 and Table 4.25 that provides the identification of some themes located from Participant Primary Coded Data applied via the Participants Coding and Sourcebook (Appendix 4.9) to the History of the GLAA.

Figure 4.2. GLAA licensed gangmaster paymaster Managed Services Provider/Programme Model (GLAA/MSPM)

4.1.3.2.3 History of the GLAA

In relation to subchapter 2.2, this subchapter relates to RQ 1, RQ 2, subchapter 2.2 and Appendix 4.9. This subchapter provides the History of the GLAA, with participant primary interview data displayed in Table 4.25.

This subchapter provides examples of participant primary coded data, that helped identify the DLMEs preferred Expert for advice, the application of the AWR, the Modern Slavery Act 2015 and Immigration Act 2016, Core and Periphery Models, the SAWS, GLAA Operations, Workers Transport into the UK, Workers Holiday Pay and the actions of GLAA Board Members and ALP Services.

History of the GLAA (Participant Data)	
Primary Coded Data	Participant Questions and Response Data
Appendix 4.9 Data Codes: RQ 1, RQ 2 GLAA Expert	The researcher questioned the formation of the GLA, the ALP responded describing themselves and the ALP as "*an expert on the GLAA*" and the person that facilitated "*the formation of a trade association".* The ALP representative had joined the members council and the ALP. A second gangmaster representative from the REC also owned the licensed gangmasters Staffline and they also sat on the GLA board (Investegate, 2013, February 21). The GROUP and ALP were asked why the GLA now GLAA secretariat and governance rebranded all recruitment agencies and businesses, employment agencies, managed service providers and operators as labour providers? The GROUP talked about how: *"…. gangmaster was an unpopular name."* [GROUP]. *because of what was happening in Lincolnshire in the days when* [ ] *and* [ ] *were in the* [ ]*, there were lots of people on benefits who were coming from the likes of South Yorkshire and Nottinghamshire and places like that descending on places like Spalding Boston in Lincolnshire, working in the fields and the farms.* [GROUP]. *They were the true Lincolnshire gangmasters, where a contract was a handshake between a gangmaster and a farmer…..that's why the GLA was formed to regulate that sector, but of course it brought in existing high street businesses.* [GROUP]. *…. the word gangmasters were used in terms of criminality.* [GROUP]. Relatedly the ALP said: *"…. we do not call ourselves gangmasters and certainly businesses wouldn't refer themselves to that".* [ALP]. The ALP explained the historical creation of the GLAA which included a handful of references to EU legislation applied as UK legislation into UK law, which included the Conduct Regulations: *"….and they formed the precursor to gangmaster licensing standards, creating a code of practice, and they did a number of audits on labour providers and did a number of other actions."* [ALP].
Agency Workers Regulations (AWR)	The researcher asked the ALP if they thought the AWR prevents/helps/stops companies from moving workers into permanent employment, because at 12 weeks the worker should go into permanent employment? The ALP response: *"…. there's nothing that says the worker should go into*

	employment." [ALP]. The ALP were further questioned: keeping GLAA workers on a CFS and applying the AWR, workers would never receive employee benefits for example, six months later they could be sent home after five hours or seven hours work, the ALP said: *"Yes absolutely."* [ALP]. The ALP then explained how the AWR benefits workers by giving them the right to equality with terms and conditions, and that the AWR does not stop an agency worker gaining permanent employment on a CoE. The ALP said: *".... the AWR is not designed to prevent the operation of agency working, there's nothing stopping someone being an agency worker for 20 years and still not be entitled to notice."* [ALP]. The ALP talked about how from a gangmaster business point of view, the AWR didn't change temp to perm arrangements contained in the Conduct Regulations, however the: *".... dominant model is the CFS."* [ALP]. No one has responsibility to monitor the AWR, so the GROUP were asked if they had seen any problems with the AWR for example, had the AWR given provision to gangmaster sectors to just have the ability to move workers on, instead of ensuring they get proper employment? The GROUP talked about how gangmasters were: *".... conscious of the period of time that if they leave them at one place, then they'll have to achieve parity with the existing workers"* so there's *"a tendency to sort of try and move workers around and that really is a bit of exploitation."* [GROUP]. The REC talked about how they were: *".... the negotiator for the CBI on the CBI TUC deal that brought the AWR to the UK."* [REC] before adding: *"Oh, I love it* [the AWR] *to bits."* [REC]. In addition, the REC talked about how gangmasters could offer workers as: "…. *a try before you buy."* [REC]. Workers on a CFS with the AWR applied could be offered a CoE, but only following the payment of a temporary to permanent fee from the client to the gangmaster. The REC described these arrangements as benefiting their clients, because their clients did not employ gangmaster workers. The REC turned the question of employing workers by their clients to an issue of Core and Periphery Models: *.... you can't stop firms outsourcing things that they do.*

	There's lots of top up, and you saw the classic Core and Periphery Model of using agency, and in food specifically there are whole spade of workers supplied by agency, that is not the problem. [REC].
Modern Slavery Act 2015 and, Immigration Act 2016	The DLME, RLAB and GROUP were asked how the Modern Slavery Act 2015 and Immigration Act 2016 had benefited food workers. The DLME described GLAA responsibilities outside of the Modern Slavery Act, because the GLAA remit is: *.... about checking whether there is forced or compulsory labour as defined by the Modern Slavery Act.* *They have no remit beyond that.* *When it was the GLA it had no responsibility whatsoever outside of the food sector.* *The GLA as the GLAA was only responsible for the licensing scheme.* [DLME]. In relation to the Immigration Act, the DLME advised there were: *"skills shortages in this country, and therefore the government was addressing the question of a perception of too many low-skilled workers coming into the country.* [DLME]. The GROUP thought the Modern Slavery Act had helped because it focused retailers and their supply chains on modern slavery, pointing to: *.... the legislation is easier to work with and so it gives a better platform for prosecutions* [GROUP] *.... the retailers are particularly focused on it as a framework of a plan of action that has held and benefited the workers.* [GROUP]. The DLME talked about how the GLAA remit is outside the agriculture and food sectors further commenting: *"GLAA is there for two things, to run the licensing scheme for agricultural workers and to invest force and compulsory labour under the Modern Slavery Act."* [DLME]. The RLAB said they kept in regular contact with all bodies they had a legal duty to cooperate with, which included the GLAA CE and Chair. The RLAB was kept up to date with GLAA intelligence, GLAA engagement with their sector and their work at: *.... the strategic level, police operational level, and intelligence sharing/prevention sector.* [RLAB]. *....and funnily enough the 2016 legislation doesn't apply in Scotland and NI you know where they have the police powers, and in my view there's a gap because the police just don't take these cases.* [RLAB].
Seasonal Agriculture Workers	In relation to SAWS, the DLME commented on SAWS workers' pay stating: *Their pay wasn't in the band that the government first set for how the Immigration Act was going to operate, so out of that, the*

Scheme (SAWS)	*government came up with SAWS which was designed to bring in agriculture workers on a limited time visa - six months.* [DLME]. *The main scheme for migrant workers is the SAWS. The GLAA collects a limited amount of information on nationalities but of course the SAWS does not relate to EU workers.* [DLME]. However, SAWS relates to all workers as the DLME further stated: *"At the last count the workers in SAWS come from 53 different countries around the world and that information is available through the HO. That has benefited the food industry in the sense it has brought in food workers."* [DLME]. The RLAB explained a change to SAWS due to the illegal war in Ukraine: *"The situation has got a lot harder because of the issue with the seasonal workers and the switch from Eastern Europe to Ukraine, and then to 58 countries in the rest of the world now, and all the issues around these and massive debt because of plane fares."* [RLAB]. The RLAB described the working environment of SAWS workers to a similar situation in Scotland: *…. you been to where some of the farming is in the hangers, you know there aren't any British people working there, and there's very loud EU music being played there, and you know if you were British, you'd be in a minority, and so you know there's all those sorts of things going on.* [RLAB]. *…. talked to labour providers in Scotland and they say Scottish people don't like working for Polish or Bulgarian supervisors.* [RLAB]. The GROUP recognised the term CFS, and talked about their known difference between SAWS workers and workers in food processing and manufacturing when they stated: *"I think the majority of workers within the sectors of the GLAA are on a CFS, the only exception to that would be SAWS workers."* [GROUP]. The RLAB stated the GLAA were not the best to lead investigative operations, for example Leicester and Operation Tacit because their: *"…. response felt very fragmented."* [RLAB]. The RLAB then described a variety of GLAA Operations that illustrated the gaps in powers between the NCA and the UKBA.
GLAA Operations	The RLAB linked financial investigations to the NCA, which was separated from other UK intelligence agencies, and talked about further gaps in powers following discussions with ex-borders people who did not have specialist powers for: *"…. financial investigations specialist intelligence*

	gathering." [RLAB]. The RLAB described in detail one Operation [ ]: *…. they would go out to Eastern Europe, recruit themselves, they were very keen on getting the same seasonal workers every year, same percentage the big farms in* [ ] *I've been to.* [RLAB]. *They have proper accommodation, they have caravans, they generally had made a real effort, and* [ ] *had still been caught out……. partly because it was a corrupt labour provider.* [RLAB]. The ALP responded by acknowledging there was: "*…. a national independent review into labour shortages in the food supply chain, which is apparently going to look at the numbers in the food industry in a more informed way."* [ALP]. The RLAB continued: *…. we talked about the role of intelligence in which sense you know different company's different growers had bits of a jigsaw, and if I'm honest with you looking back, it was probably frustration of intelligence function at the GLAA, (wasn't working) and someone at the meeting said the GLAA should be doing this, and I'm thinking 'no please it's not going to work'.* [RLAB]. The GROUP however separate some workers [GLAAC3] in food manufacturing and processing from those workers [GLAAC3] in agriculture/SAWS, and then from workers [GLAAC2] in food packing, for example: *"…. workers for instance that work in pack houses, ready meals that type of thing in the fresh produce industry, I don't see any reason they can't be awarded a CoE."* [GROUP]. The GROUP talked about the high turnover and movement of transient workers [GLAAC3] in agriculture stating: *"in terms of people popping in and out of various sectors in terms of work."* [GROUP]. The RLAB separated workers on a ZHC and a CoE in seasonal work and agriculture but highlighted one concern whereby: *"…. a lot of them don't have contracts in languages they're going to understand."* [RLAB]. The RLAB understood the CFS as a type of ZHC but did not recognise a CFS in operation in agriculture stating: *"….rules have come out for seasonal workers because it actually specifically says in the rules, they should not be on a ZHC."* [RLAB]. The RLAB talked about the use of the ZHC at a farm in [ ]:

	"…. they were all on a ZHC and they quickly changed, and it was a complete contravention of the rules." [RLAB]. When the RLAB was questioned about workers in food manufacturing and processing the RLAB said: *"I'm less sighted on that."* [RLAB].
Workers: Transport into the UK	The GROUP, ALP and REC were asked if they knew how many EU workers licensed or unlicensed gangmasters had transported from the EU into the UK in the last 5/10/15 years? The GROUP described how: *"…. the minority of the majority would have been in the UK anyway before being signed up to that licensed agency*. [GROUP]. *…. there's a significant number of EU workers in the Agriculture sector."* [GROUP]. The ALP said gangmasters did not bring workers into the UK because: *"…. nowadays there is significantly more online recruitment and advertising through social media."* [ALP]. The REC stated the opposite to the ALP, saying their gangmasters looked overseas for certain sectors by explaining: *…. members would naturally look overseas, and so our work would be more about trying to keep members safe in doing the right thing when they do that.* [REC]. *I would say that the sectors that have traditionally looked overseas for staff are agriculture for the harvest, food processing, food manufacturing, to a certain extent construction, certainly IT, and health care and social care.* [REC]. The researcher asked the REC how many EU workers via agencies and businesses have been brought in by licensed/unlicensed gangmasters? The REC explained how they were unable to define the number. The REC were unable to put a: *…. clear number on it because we don't really monitor it.* [REC]. *The best data I suspect is the official data.* [REC]. *Where the official data falls down is I do think they tend to undercount the number of temporary workers there are in the economy.* [REC]. *Traditionally we felt there were 1.4 - 1.5 million temporary workers.* [REC].
Workers: Holiday Pay	Confusion about holiday pay was provided by the REC who suggested the outcome to the Harpur Trust (Appellants) v Brazel (Respondent) Case ID UKSC/2019/0209 on holiday pay created:

	"....an incentive to go towards CFS rather than CoE." [REC]. The GROUP said the GLAA were keen to ensure GLAA registered workers received their holiday pay as per the GLAA Licensing Standard. The GROUP described one GLAA inspection: *".... someone had withheld something like a quarter of a million pounds in terms of holiday pay because workers simply didn't ask for it, and when they left, they weren't paid it."* [GROUP]. The GROUP also describe power problems between the GLAA and gangmaster trade associations: *....you get yourself to closely aligned to the REC or ALP or other, you're going to open up the potential for someone to say, 'hang on you're a bit to close here', where is the deep line of demarcation, and I think if you're not careful, and I think this is one thing we've had experience of, is treading a very fine line between working with the membership of the ALP.* [GROUP].
GLAA Board Members and, ALP Services	Gangmaster trade associations have been members of the LPC, and have been involved in enforcement discussions with HMRC, the Treasury and Bay Officials. The DLME and representatives of the ALP and REC that were interviewed were all former GLA board members. However, there was also confusion, because the GROUP equally trust licensed gangmaster trade associations and stakeholders that have led or lead the GLAA because: *.... they know the industry inside out.* [GROUP]. *.... you should have somebody that's there from the worker representation side.* [GROUP]. *So, I think worker representation based on unions, I think it's a very valid point wouldn't go amiss, but equally I'm not trying to defend the private sector, but I wonder if the private sector is properly represented?* [GROUP]. The GROUP talk about how the ALP sought to sell/promote products in each GLAA meeting stating: *".... the first 10 or 15 minutes is all about what you can buy from the ALP."* [GROUP]. The ALP describe the availability of their free resources to the researcher, describing some resources on their website, their policy papers to the LPC, DLME and the Independent Chief Inspector of UKBA. The ALP represent licensed gangmasters and provide them with: *".... support on a range of activities around sourcing and retaining workers for our members, essentially if you can be better at sourcing a group of candidates, and if you can hold onto them, you will essentially keep them."* [ALP]. as the GROUP point out:

	"…. there is always something in it for the ALP." [GROUP]. The GROUP concluded by saying they always trod a fine line with the ALP and that you could not get too closely aligned with the ALP or the REC. The GROUP described how conflict could occur when the ALP sought to change the direction of the GLA: *"….it becomes muddied, is if you are then seen as an authority to be too close to the ALP or to the REC or anybody else."* [GROUP]. The GROUP concluded: *"…. one of the difficulties has always been having an arm's length relationship with the ALP and others, but the ALP are the major player in town."* [GROUP].

Table 4.25: History of the GLAA (Participant Data)

4.1.3.2.4 Technical Issues of the GLAA

This subchapter relates to RQ 1, RQ 2, subchapter 2.2 and Appendix 4.9. In relation to Technical Issues of the GLAA, participant primary interview coded data is displayed in Table 4.26.

This table provides examples of participant primary coded data that helped identify primary data in relation to the CFS as a ZHC, elements of the GLAA CRG, Gangmaster Contracts for Workers, a DLME Strategy, GLAA Sector Models, GLAA legislation and Deductions/Payments from Worker Pay as follows.

Technical Issues of the GLAA (Participant Data)	
Primary Coded Data	Participant Questions and Response Data
Appendix 4.9 Data Codes: RQ 1, RQ 2 CFS is a ZHC	The researcher questioned the REC about the CFS that is a ZHC. The REC said: *"…. that's a different thing though."* [REC]. The researcher pressed the REC again, the REC said a: *"ZHC means one thing and that means an employment contract with zero hours setting, and that is not to say that a CFS isn't zero hours in terms of, because there is no promise of hours."* [REC]. The REC talked about CFSs in terms of agency workers stating: *A CFS carries no promise of hours whatsoever almost in nature of its design.* *I'm making a completely wonkish technical point, which is just that when we talk about ZHC, typically both us at the trade unions tend to be the employment contracts with a ZH promise, because the ZH is almost implied in a CFS, but in terms of what we count is our question to agencies, is how many temps you've got in and whether they're employed, or on a CFS, and the trend in the industries has generally been towards employing temps.* [REC]. The REC further stated that workers on a CFS were separate from agency workers, there was no non-standard form of employment and that as a trade association they supported: *"…. the position of the employer group of the ILO, which is that the language of non-standard form of employment is meant to be problematic."* [REC]. The REC argued that their work for the LPC, in response to the Taylor review, was to encourage the provision of regular hours for people working a regular week, but the REC further commented: *I do think that it's important that a) agencies think very carefully about the take home pay people are getting, and secondly, that then we have a discussion about what is fair and what isn't fair and of course with the tax on travel and subsistence a few years ago which has been ironed out but not perfectly ironed out.* [REC]. The GROUP also agrees that the CFS is a ZHC, it is a flexible contract because workers can work for different agencies, they can sign up to additional CFSs and although it can cause problems if they double shift, it benefits sites because:

	"…. if one particular site wants a few workers for you know a few hours, then that worker will actually work at a different site (another site) in the same week to top up their hours." [GROUP].
GLAA Charge Rate Guidance (CRG)	The DLME, GROUP and REC were asked if the GLAA CRG had been checked with HMRC. The researcher quoted p. 1 of the CRG, whereby a DEFRA analysis from 2003 is quoted as "DEFRA states" meaning gangmasters must follow this, but the researcher had not been able to locate a DEFRA analysis from 2003. The DLME said: *…. you should be addressing these questions to the GLAA because it is their Briefs. I used to be the Chair; I'm not the Chair now.* [DLME]. *…. talk to the ALP. Let me recommend you speak to the ALP.* [DLME]. The researcher asked the GROUP about GLAA CRG. The GROUP said: *"…. the ALP quite rightly benefit from getting good charge rates out there because their members benefit from those charge rates."* [GROUP]. The GROUP also talked about how in the early days of the GLA regulators and government agencies with the ALP checked GLA Briefs before they were put out to others confirming: *"…. there is some liaison between the GLAA, ALP and HMRC before that goes out. Obviously, you've got to make sure things are up to date in terms of the costs that were involved in that."* [GROUP]. The REC said they did not know if GLAA CRG was checked with HMRC, nonetheless the REC relied on the GLAA for published guidance and confirmed they referred: *"…. people to the GLAA for guidance."* [REC]. The REC took the view, that GLAA CRG was for the GLAA to enforce, and that GLAA standards should be complied with. The REC agreed to check the GLAA CRG was correct because there was a risk their gangmasters in the business sector could be: "…. *seen as bargain basement."* [REC].
DLME Strategy	The DLME talked about their upcoming strategy, that would be designed for gangmasters to increase/improve standards without an external regulator to: *"…. isolate the good guys from the bad guys. The ones that turn up to the meetings who want to talk about how to improve standards are typically not the people that you want to be worrying about, it's the ones who don't turn up that you tend to have to worry about."* [DLME].

GLA Sector Models	The GROUP had their own understanding of a GLA Model which includes GLAA legislation and Briefs. This is because gangmasters had different techniques to their application of GLAA legislation, the GROUP said: *…. where people operated a different model in GLA sectors to that they operated in other sectors on the basis that well actually, we will apply for a GLA licensing standard too.* [ ] *tried to crack down a bit on what people saw as a dual approach, but not unless people saw the dual approach as a way of making money.* [GROUP].
GLAA Legislation	The GROUP talked about GLAA contract legislation, licensing standards and recruitment models stating they were careful not to be prescriptive, to not put out a template contract because they were not experts. Standards were drawn up around legislation and recruitment agencies followed their own templates. There has never been a standard model, but any model should meet GLAA standards and others for example, the ALP came up with models for example Responsible Recruitment.
Gangmaster Contracts for Workers	The researcher asked the REC and GROUP about types of gangmaster contracts and what contracts were offered to their workers? The GROUP responded by providing their understanding of an SLA: *….the agreement that's drawn up between the labour provider and the labour user and it would detail everything that is expected of those parties, the rates that are going to be paid, the hours they are going to work, the type of tasks etc, who is going to be responsible for the H&S of the workers termination, so all the things you would expect in terms of the management and control of the supply and the workers themselves.* [GROUP]. This is supported by the REC who provide a detailed account of how a gangmaster contract operates: *…. increasingly in the last few years or so an MSP Model* [Managed Services Provider Model] *has been used. So, you might well have an agency based on site.* [REC] *…. you might have a range of roles that are usually filled by the agency, you would get a stable demand, and then on the workers side increasingly you'll have the APP (Gangmaster/Work based Application). The workers would have a work-based APP on their phone, so you can do scheduling digitally, and the co-primary communication is a labour demand communication between the company and the agency. The agency will then schedule in most factories.* [REC]. *There are two primary things: that are always KPI's, one is the fulfill rate if they say 100 you must get 100, the truth is you never get 100.* [REC].

	The second one is around price point, and one of the things that we are trying to really get away from now is we are really trying to that pure Pay Procurement Model. So, when the contract comes up, the bit of the SLA that's being negotiated is, what is the gross profit for the agency now, and you're being pushed down from 1.5 to 0.9 to 0.5%. [REC]. *So, for instance, a lot of work going into temp retention because it's all very well to say fill rate and charge rate, but actually if you can keep a temp on a site for 15 weeks instead of 10.* [REC]. In addition, the REC explained the gangmaster process to their contracts: *We are here to supply a contract that is let by the client, and the client wants to pay for instance the NMW, proper NLW, or the London Living Wage or whatever we can do.* [REC]. *…. if you view it as a procurement process for a commodity that you're getting in, you will always squeeze everything, you will immiserate the margin and you will immiserate the agency and you will squeeze the wages and create challenges for the workforce.* [REC]. *If you flip it the other way and you kind of accept the declaration of Philadelphia (I don't disagree with everything), the ILO say that labour is not a commodity (which I do).* [REC]. *…. you do end up with a large number of agency workers, but the contract begins to look different because you accept that there is a price to pay for that fungibility of supply.* [REC]. Governance includes the formation and oversight of gangmaster SLAs. The GROUP were asked if they thought the handshake between the gangmaster and their client had been replaced with an SLA? The GROUP said: *"…. a lot of the stuff that the ALP put out, the GLA should have been doing themselves."* [GROUP]. and there was some tension between the GLAA and trade associations for example: *"….it was normally behind what the ALP had already put out."* [GROUP]. The GROUP said the SLA: *…. was part of the standards.* [GROUP]. *All of a sudden, all this uneven level playing field became a level playing field. So, every single person who used*

labour then had to formalise their arrangement with that gangmaster/recruitment business. In order to satisfy the licensing requirement, they suddenly had to have a contract in place. [GROUP].

The REC were also asked about transport, gangmasters and/or how GLAA workers were transported into the UK? The REC responded by saying that:

"…. traditionally either by their own means, or they were for most firms, they were looking at arranging a local airlines or coach line." [REC].

The REC further said they didn't expect gangmaster charges for transport as they further stated they:

"…. would typically expect our members not to charge." [REC].

The REC did not support:

"…. requests from people like the ALP to allow for transport to be deducted from the NMW as well as accommodation." [REC].

The ALP and REC were questioned about legal deductions from worker payslips. The ALP were also asked about what sort of transport did or do their gangmaster members offer workers. The ALP responded by saying they didn't set charge rates for gangmaster deductions for transport from workers:

….as a trade association we cannot set rates because competition law exists and for an organisation to set any rates would be in breach of competition law. [ALP].

They [gangmasters] *can set their own rates. What a labour provider only earns what his client pays, there is no other magic income stream.* [ALP].

The ALP marketed transport as part of a gangmaster business:

It's a very competitive space and it is rare for clients to cover the cost of transport to work. [ALP].

So, you can have your own buses, your own driver, cover the cost of maintenance, cover the cost of petrol and all the operator's license fees, and all the on-board insurance etc, complicated issue essentially like running a transport company. [ALP].

We provide our members a guide so they ensure they calculate the accurate cost of transport, build in depreciation of the vans, and we also offer them different options that exist out there in the market like Velo and Tandem, who are offering transport to work services as well. [ALP].

	There are a lot of complexities around minimum wage as well. You can't just deduct from people's wages without it taking it below the minimum wage so there are complex receiving payment arrangements as well. [ALP]. The researcher asked the ALP what they thought would be excessive or acceptable in terms of a daily charge rate? In response the ALP talked in detail about the costs of running the transport business. It is not included directly in their gangmaster CFS Model but is a separate document the worker would sign. In addition, the ALP depict the separate document should: *"…. clearly state what the payment is, state that it's optional because if it isn't optional, it has the effect of reducing the minimum wage, and then you couldn't charge anything at all if someone is paid the NMW."* [ALP].
Deductions/Payments from Worker Pay	The ALP describe the difference between a deduction and payment for NMW tax as: *…. a deduction, that's something taken from your wages before you've received it. A payment is something that you pay separately having received your wages. That's the difference for NMW pay purposes, it doesn't matter whether it's before or after tax, that's a taxation issue.* [ALP]. *What you have is that common sense doesn't matter, it's the exact legal interpretations of the NMW regulations from 1998 now 2015, and how they are interpreted by the NMW Enforcement team at HMRC.* [ALP]. The ALP provide an example: *If you came to me and asked for an advance of wages and I said yes, and you chose to pay for transport with that advance of wages, and payslip showed a deduction of an advance then it could, but where there is a deduction on a payslip for transport to work, say you know your gross and he takes £40 from your gross pay, that has the effect of lowering your NMW pay for NMW purposes.* [ALP]. *If you earn £20 p.h. and you did 40 hours p.w. and I took £50 off you for transport for work, it wouldn't matter because your wage hasn't gone below NMW.* [ALP]. The GROUP were asked about transport and costs whereby they said: *…. it's given that level playing field to the labour providers, in that it's saying someone's put this out. In some ways the whole sector and the retailers are happy that there is a figure out there that can be seen as a standard.* [GROUP]. *…. it's turned into an industry benchmark that everyone with contracts with arrangements is happy with*. [GROUP].

	The ALP and GROUP were asked, who monitored licensed gangmaster accommodation offset claims? The ALP confirmed: *"…. whoever provides accommodation to their workers is responsible for it. That's HMRC enforcement."* [ALP]. The GROUP further detail a gangmaster model and the accommodation offset: *….an employer providing accommodation, you can only deduct £60.90 from somebody that's being paid the minimum wage, and with things like increasing fuel costs, energy costs and costs etc, it is becoming increasingly difficult for an employer to provide that accommodation at a reasonable price that the worker can afford. So, I think what we're finding now is that a lot of people, a lot of employers/landlords are getting round that by deducting amounts from workers but not from their wages.* [GROUP]. *What you'll see is the £60.90 that comes off their wages each week, but unbeknown to anybody else you do get the deductions where a bill will arrive for the energy or whatever for the utility bills on top of that.* [GROUP]. The ALP, GROUP, RLAB and DLME were asked about the REC CFS Model. In response, the ALP talked about the CFS: *….key rights not to be discriminated, rights to a minimum wage, right to the WTR which includes holiday pay, of course rights under the Working Directive, but you don't have rights such as the right to unfair dismissal protection after two years and the right to redundancy.* [ALP]. The ALP also talked about their CFS template which has ZHC flexibility: *"…. the government has been protective of this flexibility, which according to its analysis of the labour market, enables the UK to be much more responsive to come back quicker in terms of economic danger."* [ALP]. This was supplemented by the ALP talking about GLAA responsibilities, stating: *"…. it's not within their power or responsibility to guide the industry. The only thing they have jurisdiction to do is to apply the license. So, their job is to make a decision if a business is compliant or not."* [ALP]. The ALP advised the researcher that it was not for the GLAA: *"….to say here's a model contract, here's how you do this, or here's how you do that."* [ALP]. Furthermore, the ALP quoted a CIPD report [which is the CIPD (2015) report in subcategory 2.2.2], that reports workers on ZHCs are happy on flexible government contracts, how workers can make

	choices and how if workers don't get the hours they want, they can move on. The same CIPD (2015) report is also quoted from, by the DLME. Nonetheless, HR Managers are employed by their FMC as HR Business Managers that assist a FMC SLA because they have access to payrolls, but access to GLAA workers purchased in the SLA is via the GLAA workers licensed gangmaster. Gangmasters are responsible for ensuring workers have their own separate bank accounts, however if workers are moved or move themselves to work on different sites, then it is possible workers are placed on more than one payroll because each site has its own payroll, so workers with different jobs with different gangmasters can use the same or different bank accounts. The researcher explained to the DLME, how a CFS was a ZHC because workers do not get the same benefits and holidays as employees on a CoE. The researcher further explained that a ZHC is a non-standard form of employment, workers are not employed on a ZHC, there are no guaranteed hours. In response, the DLME provided a detailed description of a CFS including CIPD research as follows: *The ZHC are as I understand it, are CoEs.* [DLME]. *A CoE: all the benefits of a fully employed contract.* [DLME]. *But it does create some obligations what people are paid when they do work.* [DLME]. *The research that I have read and I haven't done any research myself, says that people who are on ZHCs, roughly three quarters of them enjoy being on ZHCs and think they're a good thing.* [DLME]. *A CFS is where the person undertakes to provide a service and there are certain rules about, they can substitute someone else, they don't have to turn up themselves, those sorts of things are parts of a CFSs, whereas if you're a worker then I wouldn't have understood that you could provide somebody else to do your work on any given day.* [DLME]. *I know what ZH means but a service contract is where you contract to provide a service which you don't have to provide yourself.* [DLME]. The DLME argued that it did not make the contracts the same: *…. the guidance in terms of assessing worker status, you have to be able to substitute somebody else other than yourself in order for it to be a CFS.* [DLME]. *The question of guaranteed hours is as I understood it, a separate matter. If you could be on a CFS or a ZHC of employment and there's still no guarantee of work either, but the characteristics of one contract and the*

characteristics of the other as I understand it are different. [DLME].

On the subject of the CFS, the DLME was asked if a worker on a CFS for example, they worked 15 hours one week, 40 the next, 20 the next, 50 the next, and 10 the following week, if they have deductions for transport, benefit cards, was there a cutoff point the GLAA looks for? The DLME did not provide a clear response to any cutoff point for worker deductions:

> *"You're starting from your putting multiple hypothesis here, if somebody is on a ZHC they're still subject to the NMW."* [DLME].

> "…. *there isn't a numerical cutoff."* [DLME].

The RLAB provided additional information to the CFS as a ZHC stating:

> *"…. you could kind of argue that some of that is business model stuff.* [RLAB].

> *I don't know whether you're right about how the gangmasters were not quite gaining the system, but they are applying within the word of the law."* [RLAB].

In addition, the RLAB provided Operation [ ] as an example of a big gap between:

> *"…. allegations being made and being able to prove."* [RLAB].

The RLAB talked about Operation Fort, whereby some workers were moved between food factories and packing houses in modern slavery and how gangmasters:

> *…. they had quite a lot of people who were going back to the same address, and some with the same bank account, but certainly the same address, and you would have thought some basic checking in HR would think there are quite a lot of people living at the same address.* [RLAB].

The RLAB provided an example of the lack of powers afforded to the GLAA at a retail factory:

> *…. they come to the factory door and they haven't got a warrant so there's no kind of criminal allegations, but they can hear the machines whirring in the building and they're not allowed in there, you know someone closes the door and doesn't let them in. You know there is a debate about whether they have a power of entry, should they have a power of entry, and I still don't have a fixed view about whether there is a gap in powers or not, but I do know they were very frustrated about that*. [RLAB].

The RLAB talked about when they carried out detailed work during Operations there was a sense of:

	"…. they were putting information into some sort of dark hole and not getting any feedback at all." [RLAB]. and how the GLAA must have been asking for more powers because the RLAB: *"…. got a call from number 10 and some of the political advisors are saying the GLAA are suggesting they haven't got enough powers, but that's just rubbish they have enough powers"* but the RLAB wasn't sure *"whether there's a powers issue at the bottom of it all."* [RLAB].

Table 4.26: Technical Issues of the GLAA (Participant Data)

4.1.3.2.5 Employee Status

This subchapter relates to RQ 1, RQ 2 and RQ 3, subchapters 2.1 to 2.3 and Appendix 4.9 In relation to Employee Status and their location in ONS statistics, Appendix 4.9 provides participant primary coded data.

This subchapter provides Table 4.27 that includes examples of participant primary coded data that identified ONS Data, Companies House and Universal Credit, the ERA1996, discussions in relation to GLAA worker Employee Status, Worker Common Problems and Worker Representation as follows.

Employee Status (Participant Data)	
Primary Coded Data	Participant Questions and Response Data
Appendix 4.9 Data Codes: RQ 1, RQ 2, RQ 3 ONS Data	The researcher questioned the participants about where GLAA workers could be located in ONS statistics. The researcher also questioned where agencies with transport companies and food companies could be located in ONS statistics. The GROUP said: *"I don't think it's ever been looked at and I'm not sure how much appetite there has been to look at it."* [GROUP]. In addition, the GROUP said that: *.... when you look at the stats around any one area, you could look at is how many migrant workers are in the UK, how many legal workers are in the UK. There's been no way of joining the dots up, there's been no count that has been anywhere near sufficient to capture everything.* [GROUP]. The researcher asked the same questions to the DLME. The DLME suggested the researcher talk to the GLA because that sort of thing had not come across their desk, including when they were the Chair of the GLA. The DLME again suggested the researcher talk to a representative at the ALP who: *"....is very knowledgeable and supportive of workers, that I'm very impressed by their concern and how the right thing is done by workers."* [DLME]. In response to the same question the REC changed the subject: *.... from an academic and from my partly wonky perspective that is a challenge, but I think that is far less of a problem than for instance if those agencies have a transport arm, what are they charging the agency workers, that for me is significantly more of an issue.* [REC]. The researcher questioned the REC about gangmaster transport not filtered through the ONS properly, because there is nothing to suggest gangmaster transport is incorporated in total UK Transport Statistics (GOV.UK, 2024, December 19). The REC talked about gangmasters/agencies with transport arms and how wrong SIC Codes applied at Companies House could stop GLAA enforcement action. The REC pointed to their membership of gangmasters, with half having a turnover of less than £2 million p.y. and what was a simple reporting framework for small gangmaster companies and how their compliance could be simplified. The REC said: *"…. the primary challenge here is agencies having the wrong SIC Code and I keep coming back to - its experience and enforcement."* [REC].

	The REC pointed out their annual survey produced different and higher numbers of agency temps, compared to agency temps at the ONS that totalled 1.4 to 1.5 million that the ONS captured in sectors that included agency workers as an IT developer in major corporates and care workers mostly on the NMW in care homes (REC, 2024, November 26): *…. through to the workers we have been discussing in the GLAA licensed sectors. I would say the balance is probably more towards what we call the general staffing; we call the blue-collar scales likened than the professional staffing but not massively* [REC] stating further the REC captured: *"…. more of the people the ONS struggles to capture."* [REC]. The REC talked further about the ONS LFS, stating reasons why the LFS or ONS did not capture some people, for example those: *…. who are not permanently in the UK or are flat sharing, it's far easier to get hold of people if they've got a land line run mobile phone, there's a whole stream of reasons why the ONS might be under accounting agency workers.* [REC]. The researcher asked the REC if the worker numbers they were collecting included numbers of workers from other sectors like food manufacturing, food processing and textiles sectors. The REC confirmed: *"Yes, we will be. All UK numbers."* [REC]. The researcher further questioned where the food manufacturing and food processing sectors were at the ONS, because when the researcher had searched for the sectors and their GLAA workers at the ONS, the workers and sectors could not be located, in addition to the UK lacking growth and productivity. On productivity, the REC said: *…. what does productivity look like? That and you let a different contract, no, I do think that you do end up with a large number of agency workers, but the contract begins to look different because you accept that there is a price to pay for that fungibility of supply.* [REC].
Universal Credit and, Companies House	The researcher argued the price to pay would be at a cost to the public via public funds because Universal Credit is needed to top up workers weekly income, this is not claimed at the moment by GLAA registered workers on a CFS. The REC agreed: *No, they're not, but that's part and chapter of an international workforce. Look from my point of view the challenge here is how do you get the client side to think about productive labour engagement of non-permanent open-ended labour.* [REC]. The REC followed this by moving their response to questioning if workers could be forced:

	"…. into a certain form of employment, and rather too little about the treatment people are receiving from the form of employment they're in." [REC]. The ALP responded to the same questions by talking about Companies House SIC and SOC Codes, before explaining that the ALP checked new members had the right codes at Companies House because Companies House does not check SIC and SOC Codes stating: *…. there is a different range of numbers they can use, but the ONS will use that standard class system for where they put people and employ people. So, it's not something that we/I've looked at in terms of numbers cos it's too general, and what you can't do with that is narrow it down, you can't use those official statistics in terms of narrowing it down as to how many there are in the agency sector.* [ALP]. *I've not seen any statistical analysis that gives a true picture of the food industry and that was something that was identified by the DEFRA committee in 2017, it still hasn't been done.* [ALP]. *There is a national, an independent review into labour shortages in the food supply chain, which is apparently going to look at the numbers in the food industry in a more informed way.* [ALP]. *I don't know where they are. They don't appear as far as I can recall, appear to be in the sector to which they are working.* [ALP].
Employment Rights Act 1996	Nonetheless, the ALP supplemented these comments by talking about GLAA workers in ONS statistics: *It's difficult to find any meaningful statistics within ONS or anywhere else for the amount of agency labour used.* [ALP]. *The situation is that someone on a CFS is not an employee you're correct, and there is a range of legislation that only applies to employees.* [ALP]. *There's a series of legislation that applies to both employees and workers, to a worker on a CFS is a worker, and that comes under s.230(1.b) of the Employment Rights Act 1996 which established that kind of status of employment.* [ALP]. *Employment businesses that use the term employed, employee, employer, employs for a worker are using the wrong language, and it's one of the factors that should they ever be taken before a tribunal, it's one of the factors that would come out in evidence for the individual being actually employed rather than being a worker.* [ALP]. To respond to the three Research Questions, the researcher continued exploring the GLAA history, statutory and functional role to regulate labour, GLAA governance and the data and collection techniques of the ONS. To assist with this, participant's primary data is now supplemented with primary data from ALP and GLAA Email Communications.

Employee Status	The researcher questioned the DLME [because they were a former GLA board member] and GROUP [because they were formally employed by the GLAA] about GLAA documents that could be linked to employment status and/or employment models that have been removed from observation on the GLAA website. The three participants were asked if they had a copy of the documents. The DLME recommended the researcher talk to their expert, but the GROUP said: *"…. if you sort of have a blackhole in documents,* [ ] *would have no idea why that would be the case."* [GROUP]. The GLA/GLAA secretariat and governance have made employment decisions for workers i.e. their status and deductions or payments from wages. The ALP were questioned on worker employee status, whereby the ALP talked about the GLA Employment Status document (GLA, 2012, January; GLAA, 2021, May) stating it was a: *…"simple kind of position statement.* [ALP]. *…. the GLA could not get their head around status, and I had to go back to them numerous times because they kept confusing status for tax purpose, with status for employment law purposes."* [ALP].
Worker Common Problems	To assist GLAA workers, the researcher asked the REC if they could provide the most common problems migrant workers asked licensed gangmasters to resolve for them? The REC suggest payroll issues because there are questions around understandings, and how things work in the UK. The REC also talked about how they worked with unions to: *"…. put language and guidance into appropriate languages at the time of the big inflow".* [REC].
Worker Representation	The researcher asked the GROUP and ALP if GLAA registered food workers had their own or any representation from trade unions and/or HR, and if not, what were their thoughts regarding workers joining trade unions. The GROUP said many GLAA workers felt inhibited by some full time workers. Also, the GROUP suggested management should be talking to and including workers in meetings and gave an example of how some working groups they knew are encouraged to sit in management meetings. Nonetheless, the GROUP talked about how trade unions are a missing piece of the jigsaw, they used to sit on the GLA board until they were removed, further stating trade unions should be more involved with registered GLAA workers: *…. they are the people on the ground, they know what's happening, they know what people are telling them about, and especially now with what's happening at the moment in terms of you know Cost of Living wages etc, and yes they should be more involved.* [GROUP]. Once again, the researcher was advised by the DLME to talk to the ALP, because they are the experts. The ALP took a different approach: *I haven't seen a coherent strategy from the trade union movement to engage with the most vulnerable in our society and those in*

	most precarious work be that undocumented workers, migrant workers, agency workers, those working at the most at risk industries, and one would hope a trade union movement would have a coherent strategy and secondly, an offer from a trade union to a worker should be compelling such that I look at what I could get from being a trade union member and I should say/think 'god that's worth it', and what does that mean, it would mean loads of things but it would mean 'wow yes', I should belong to that. [ALP].

Table 4.27: Employee Status (Participant Data)

4.1.4 Phase 3: Findings of Email Communications

4.1.4.1 ALP Emails

Following the interview, the researcher and the ALP exchanged emails in relation to Technical Issues of the GLAA, GLAA CRG and the Precision Prospecting Ltd (2005) report that relates to employees in agriculture working 45 hours p.w. in full time employment. In response to emails, the ALP provided the researcher with the following emailed responses:

> *The Guidance is not checked with HMRC* (ALP, personal communication, September 12, 2022).
>
> *The NMW and NI rates are already set so there is nothing for them to check* (ALP, personal communication, September 12, 2022).
>
> *It seems this document was a piece of evidence to DEFRA* (ALP, personal communication, September 14, 2022).
>
> *I have no DEFRA report* (ALP, personal communication, September 14, 2022).
>
> *There are no instructions to the ALP to follow the advice given in the Precision Prospecting report* (ALP, personal communication, September 14, 2022).
>
> *The ALP's model Contract for Services is designed to meet the law as it applies to the recruitment, engagement and supply of agency workers* (ALP, personal communication, September 20, 2022).
>
> *It is also beyond the GLAA's remit to approve or endorse our contract* (ALP, personal communication, September 20, 2022).
>
> *It is also beyond the GLA(A)'s jurisdiction and remit to provide model contracts, templates or procedures* (ALP, personal communication, September 20, 2022).

4.1.4.2 GLAA Emails

GLAA senior management had put a stop to semi-structured interviews with GLAA board members, therefore the researcher emailed questions and FoI requests to the GLAA. All emailed questions and FoI requests were in relation to GLAA Technical Issues.

The researcher emailed the GLAA with questions regarding GLAA past and present CRG that was compiled by the ALP for the HO led GLAA. The researcher asked for a copy of the DEFRA 2003 analysis, whereby DEFRA is referenced as "DEFRA states" etc on page 1 of the GLAA Brief Issue 78 - April 2022 CRG (Appendix 2.1) and earlier GLAA CRG Briefs. The GLAA emailed a copy of the Precision report to the researcher. The copy of the Precision report was in a poor condition, it was not a finished copy of the report and had comments attached to it. Therefore, in addition to earlier emailed questions, the researcher asked the GLAA if it was the final copy of the Precision report and asked the GLAA if they had their CRG checked with HMRC before use. Below are two emails and a FoI request whereby the GLAA confirmed:

> As stated in Brief 78, the information on charge rates is provided by the ALP as set out in the introduction. Under 'further information' the Brief directs queries on the figures to be sent to the ALP as it is their information and not a requirement of the licensing scheme to meet these charge rates. Therefore, the GLAA does not hold the information you have requested (GLAA, 2022**,** September 26).
>
> *In your previous request regarding the Defra Analysis 2003 we contacted the ALP who compiled the brief. They shared the attached document with us. The evidence commissioned by DEFRA is in Appendix 6. As this document is from 2003, it should be treated as such* (GLAA, personal communication, October 11, 2022).
>
> *May I suggest you ask the Association of Labour Providers about the first question as the document we sent belongs to them* (GLAA, personal communication, October 13, 2022).

4.1.5 Phase 3: Findings of GLAA FoI requests

The researcher had sent FoI requests to the GLAA via email and the GLAA responded via email. The researcher asked the GLAA for copies of any GLA and GLAA Annual Review Executive summaries for the years 2005, 2006, 2007, 2008, 2009 and 2010 with any consecutive summaries. The researcher also asked the GLAA for a full copy of GLAA Minutes of all meetings from April 2010 to November 2010 that may be numbered consecutively from approximately 26/8.7 through to 27.71. Meetings may include GLA board meetings, liaison meetings, general literature etc. The GLAA were also asked if

the GLA board meeting on the 16th of June 2010 (or similar) went ahead? GLAA response emails and identified in response to FoI requests are as follows:

> Minutes for the period between April 2010 to November 2010 can be found online. This includes Board minutes and various papers including Labour Provider Liaison Group minutes (GLAA, 2022, August 17).
>
> We do not hold copies of the Annual Reviews and Executive Summaries that you reference. Under our duty to assist (s16), we advise you to look at the GLA(A) page on the National Archives (GLAA, 2022, August 17).

The GLAA were also asked for copies of minutes of meetings for the Worker Representative Liaison Group Meeting on the 9th June 2010, Labour User Liaison Group Meeting 20th May 2010, Labour Provider Liaison Group meeting 26th May 2010 (they are the Fourth meetings of their groups), in addition the GLAA were asked to provide the Fifth meetings of the groups. The GLAA did provide dates for Fifth meetings, but no data was provided and cannot be located. GLAA response emails and identified in response to FoI requests are as follows:

> There were no Board meetings between those on 21 April 2010 and 25 November 2010. You will see they are consecutively named 'twenty-sixth board meeting' and 'twenty-seventh board meeting' (GLAA, 2022, August 17).
>
> In line with our Retention and Destruction policy, information held relating to liaison group meetings for the period you requested was deleted from our shared drive in May 2022. Minutes available:
>
> Worker Representative Liaison Group third, fourth and sixth meetings
> 02-12-2009, 03-03-2010 and 22-09-2010
> Labour User Liaison Group third, fourth and sixth meetings
> 25-09-2009, 19-02-2010 and 26-08-2010
> Labour Provider Liaison Group third, fourth and sixth meetings
> 05-11-2009, 19-02-2010 and 07-09-2010
> Dates identified of fifth meetings dated:
> 09-06-2010, 20-05-2010 and 26-05-2010.

For each individual meeting the GLAA responded with:

> If this meeting took place, the minutes cannot be found and may have been deleted in May 2022 in line with our retention and destruction policy. Therefore, the GLAA does not hold the information you have requested.
>
> This information will be deleted in the future from our website in line with our retention and destruction policy (GLAA, 2022, September 6).
>
> You will also be able to find information on the National Archive page (GLAA, 2022, September 6).

Following GLAA FoI responses as above, the researcher asked the GLAA for links to the deleted items referred to as the Fifth meetings, that the GLAA had placed in the UKNA in May 2022. The researcher also asked for any information in relation to the GLA REC Contract for Service Model referred to in the Fourth meetings, to include all information as to what its content may include, what it looks like, any additional stakeholder involvement including the LPC, trade unions, HRM, any equality and diversity direction, and what sectors it may be used in. In response the GLAA confirm:

> The GLAA also does not place information on the National Archives website as suggested in your question, rather the National Archives captures 'snapshots' of all UK central government websites (GLAA, 2022, September 30).
>
> As stated in our response to your previous FoI request (GLAA, 2022, September 6), information held relating to this liaison group meeting was deleted from our system in May 2022 in line with the GLAA Retention and Destruction policy. Furthermore, the Contract for Services model you reference was not GLA owned, but an initiative from the REC (GLAA, 2022, September 30).

4.1.6 Phase 3: Findings of ONS Data

To locate GLAA registered workers recorded in national statistics as per RQ 3, the researcher integrated and merged critical realism with primary data from questionnaires and interviews, personal email communications with the ONS and GLAA alongside GLAA FoI requests, with secondary data from various quantitative statistical data. All data has been cross validated and reduced under labelled subcategories observed below, with the statistical analytical data analysis of ONS data, to identify where GLAA workers are recorded at the ONS, because UK and multinational accounting services and global gangmasters provide data to the ONS, government and globally.

4.1.6.1 ONS Emails

The researcher had telephoned the ONS requesting a face-to-face semi-structured interview, but this request was turned down in telephone conversations and via emails from ONS representatives in the Labour Market Department including one Economic Advisor. The ONS were happy to chat briefly over the phone regarding their work, but they also encouraged the exchange of emails to clarify or to explain their employment data and how employment data was collected. The ONS indicated they would pass the researcher's questions to a handful of people who pass their information to the Labour Market Department. Therefore, the researcher emailed information and a list of questions for help to locate GLAA registered workers in ONS labour market data illustrated as Appendix 4.10 (ONS, personal communication, August 3, 2022).

Emails from the researcher to the ONS generated a confirmed response as to their inability to locate GLAA workers on a CFS whereby the ONS confirmed "*its only in our Labour Force Survey that we ask about zero hour contracts*" (ONS, personal communication, August 3, 2022), and they had "*nothing specifically on zero hour contracts or CFS*" (ONS, personal communication, August 4, 2022).

More detailed emails from the researcher asked the ONS if the LFS includes the term ZHC under the term 'employment', which indicates it as a form of 'employment'. The researcher also advised the ONS that a ZHC is a form of non-standard employment and should therefore not be under the term employment, because recruitment agencies, recruitment businesses, licensed or unlicensed gangmasters which are recruitment agencies and recruitment businesses, tend to use a CFS which is a ZHC. Nonetheless, in conclusion to all researcher questions, different representatives including an Economic Advisor from the Labour Market Department, representatives from the Data Advice Team and Social Surveys Department, Statistical Contacts in the Labour Market and Households Division and one Senior Economic Advisor of the BRES team emailed their collection methods of employees. Collection methods of employee and agency worker data were provided as website links for the researcher to access. The researcher accessed the websites but was unable to locate GLAA workers on a CFS. The researcher was also unable to identify gangmasters/recruitment agencies separately in the HMRC PAYE Real Time Information (RTI) Data because recruitment agencies/gangmasters are all absorbed in the "*Administrative and support service*" section (ONS, personal communication, August 18, 2022).

Therefore, in response emails, the researcher advised the ONS they were unable to locate GLAA workers on a CFS and the representative agreed to pass their email including their research questions to relevant ONS departments so that GLAA workers could be located (ONS, personal communication, August 3, 2022).

The ONS response email from the LFS reiterated "*on the LFS it would be dependent on how the person answered the survey*". This is because the LFS question asks people about their main job and hours worked, stating "*if those on a CFS believed they were on a ZHC, then they would be recorded here*" (ONS, personal communication, August 3, 2022). A second email (ONS, personal communication, August 4, 2022) stated "*there are business surveys, where we collect information on employment, turnover from a range of sectors etc but nothing specifically on zero hour contracts or CFS*".

In response, the researcher emailed ONS representatives in the Labour Market Department that were both Economic Advisors explaining they were unable to locate GLAA workers on a CFS, reiterating their request to locate GLAA workers on a CFS. The researcher also copied in the National Statistician and CE of the ONS to ensure their concerns were noted (ONS, personal communication, August 4, 2022). In response, an ONS Economic Advisor emailed the researcher and agreed to a short discussion over the telephone (ONS, personal communication, August 5, 2022) whereby they confirmed their inability to locate GLAA workers. Emails concluded between the researcher and the ONS whereby emails stated "*the GLAA should be able offer advice on available data and further contracts*" (ONS, personal communication, August 18, 2022).

The Data Advice and Relations Team in the ONS Social Surveys department (ONS, personal communication, August 21, 2022) confirmed LFS responses are peoples "*perceptions of work, unlike BRES, where information comes from employers*". The Data Advice Team copied in the BRES team for assistance (ONS, personal communication, August 21, 2022). The Statistical Contact at the Labour Market and Households Division emailed the researcher:

BRES samples 80,000 businesses annually providing answers used for weighting on the IDBR (Inter-Departmental Business Register) for GB and NISRA statistics, but agency workers are only included in the BRES survey.

BRES described their collection of data from recruitment agencies via the IDBR:

> *Firstly, we have our Earnings and employment from PAYE RTI. It uses anyone that's paid through the PAYE system. There's info here by industry…..but we aren't able to identify ZHC* (ONS, personal communication, August 3, 2022).
>
> *The IDBR holds all VAT and/or PAYE registered businesses in the UK. ONS does the survey for GB and NISRA do their own survey for Northern Ireland which is used to supplement the GB estimates* (ONS, personal communication, August 25, 2022).
>
> *Each business on the IDBR has a Reporting Unit (RU) and attached to them are their Local Units (LU's). The RU can sometimes be a head office with a corresponding SIC for head office activities.*
>
> *For example, you might, have Birdseye (RU) head office with an SIC of head office activities, and then Birdseye LU's dotted around GB with manufacturing SIC's, according to what they're actually producing* (ONS, personal communication, August 25, 2022).
>
> *BRES reference date is always the first Friday after the second Thursday in September each year. Our questionnaires specifically ask businesses to only*

> *include employees who worked on that day. Furthermore, it asks them to exclude agency/contingent/contractor workers*
> (ONS, personal communication, August 25, 2022).
>
> *For any agency worker to be included for BRES (both NI and GB) they would have to have been working on the reference date. If an agency worker was working at a food manufacturing business on the day of selection, that business is asked to exclude any agency worker. Where they would be included is if 1). The agency they are engaged by is on the IDBR, 2). They are working on the reference date, and 3). The agency pays them for the work they have done on the reference date* (ONS, personal communication, August 26, 2022).
>
> *If PAYE employment is lower than the BRES figure, this is sometimes indicative that the business has incorrectly included agency workers, so we ask the business for an estimate of employment that excludes the agency workers*
> (ONS, personal communication, August 26, 2022).
>
> *As supplying labour in a way is illegal, I would imagine that those businesses supplying the labour are not on the IDBR and those that are licensed are and their employees need to fulfil the criteria. It might be possible that there are unlicensed businesses on the IDBR but if we knew that, we'd be telling the GLAA. It would seem that unlicensed gangmasters would be supplying contingent labour illegally and therefore, we would not be reporting their employment estimates* (ONS, personal communication, August 26, 2022).
>
> *On the LFS it would be dependent on how the person answered the survey: flexitime (flexible working hours), an annualised hours contract, term-time working, job sharing, condensed/compressed hours, zero hours contract*
> (ONS, personal communication, August 3, 2022).

Further emails from the ONS advised the researcher to contact the GLAA because they "*should be able offer advice on available data and further contacts*", because the ONS did not collect them separately and could not access them (ONS, personal communication, August 18, 2022). Therefore, the ONS referred the researcher back to the GLAA who indicated they did not collect registered worker data, even though the GLAA did as per Table 4.28.

4.1.6.2 GLAA FoI Requests and Emails

The ONS were not able to provide the researcher with GLAA registered worker numbers, therefore, the researcher asked the GLAA to provide numbers of all workers in the GLAA remit working from a CFS. The GLAA were asked which data set they were included in and how they are included. In response the GLAA wrote:

> The GLAA does not update and maintain information relating to the number of workers operating in the GLAA regulated sector. Therefore, the GLAA does not

hold the information you have requested. The GLAA does not feed data into the Office of National Statistics (GLAA, 2022, August 23).

We understand that the ONS may have advised you to ask the GLAA for this data. However, we do not collect or maintain the number of workers in our regulated sectors (GLAA, personal communication, September 8, 2022).

The only time the GLAA may ask a labour provider for an approximation of the number of workers they employ is during a compliance inspection (GLAA, personal communication, September 8, 2022).

4.1.6.3 ONS Data

4.1.6.3.1 Historical GLAA Worker Statistical Data

In relation to RQ 3, with all things considered in subcategories 4.1.6.3.1 to 4.1.6.3.7, the National Statistician and CE of the ONS was made aware of the researcher's investigations to locate GLAA workers in ONS statistics because the researcher copied them into an email to ensure they had knowledge of the research (ONS, personal communication, August 4, 2022).

The UK government has not and does not measure gangmaster Business Services as per the Department of Economic and Social Affairs Employment (2011, p. 101) because GLAA workers are not employed and are therefore not employees. In any case, UK Foreign Affiliates Statistics (FATS) does not include the number of people employed including GLAA workers in Table 1.1, their gangmaster turnover, and the workers geographical location and activity are not collected and they do not collect numbers of gangmasters, and/or any value added to the UK economy from gangmaster services, gangmaster business total sales including their turnover or output, and numbers of GLAA workers crossing borders in and out of the UK.

In addition, and in relation to RQ 3, the International Labour Organization (2016) define a ZHC as a form of non-standard employment. To add further clarity, Eurofound (2021, March 11) describe "non-standard employment is an umbrella term for different employment arrangements that deviate from standard employment. Non-standard employment includes temporary employment; part time and on-call work; temporary agency work and other multiparty employment relationships; as well as disguised employment and dependent self-employment." It is disguised employment of GLAA workers on a CFS which is a ZHC that are absorbed as employees in all UK data.

To assist comments above, the illustration of Table 4.28 has pulled together secondary data from government departments including the GLA and GLAA that have identified

numbers of GLAA licensed gangmasters and GLAA registered worker data between 2004 and 2025, and in most cases, approximate average numbers of workers per licensed gangmaster have been provided.

There is a huge increase in gangmaster licenses from 53 in 2010 to 1,896 in 2012 with gangmaster licenses falling back to 1,100 in 2013, with the same number of gangmaster licenses not rising above 1,100 until 2025 when 1,164 licenses are confirmed.

Total GLAA registered worker data is not provided in 2012 and 2025, but registered worker data ranges from 20 to 827 workers per licensed gangmaster between 2004 and 2017, but then rises to a colossal 10 million workers in 2017, later confirming 10 million workers in 2020, even though the HO led GLAA contradicts itself three times in their GLA (2018, July 19) report. GLAA registered worker data is in stark contrast to the TUC (2024, June 14) report that estimated a huge 4.1 million people in insecure work on ZHCs; by simply adding together data they collated from agency workers, casual, seasonal and workers on a ZHC from the LFS and a Family Resources Survey.

The ONS has confirmed in response emails to the researcher, that the ONS does not collect GLAA registered worker data separately and it is not provided to them separately.

However, in subcategory 4.1.5, the GLAA has confirmed via FoI requests and response emails to the researcher (GLAA, 2022, August 23; GLAA, personal communication, September 8, 2022a; GLAA, personal communication, September 8, 2022b), that they do not collect GLAA registered worker data, even though the GLAA clearly does because Table 4.28 displays their registered worker data and in any case, the GLAA is a registered body and has a responsibility to provide registered worker data to the ONS.

Licensed Gangmaster and GLAA Registered Worker Data: 2004 - 2025				
Date	Approximate Numbers: Licensed Gangmasters	Approximate Numbers: Workers in the GLAA remit	Average Numbers: GLAA Workers per Licensed Gangmaster	Citation
2004	3,000	60,000	20	Sheridan (2004)
2004	1,000	420,000 - 611,000 (Spring 2004)	611	Precision Prospecting Ltd (2005, p. 92)
2010	53	8,369	158	GLA (2010, April 21b)
2012	1,896			GLA (2012, June 27, p. 43)
2013	1,100	910,000	827	GLA (2013b, p. 4)
2014	986	500,000	507	GLA (2014, July 15, p. 3)
2015	954	550,000	577	GLA (2015, p. 2) GLA (2015, p. 28)
2016	1,000	464,000	464	GLA (2016, December 8, p. 2) GLA (2016, December 8, p. 8)
2017	1,000	460,000	460	Metcalf (2017, p. 8)
2017	1,000	464,000	464	GLAA (2017b, p. 2)
2018		**10 million** 464,000 800,000		GLA (2018, July 19, p. 1) GLA (2018, July 19, p. 2) GLA (2018, July 19, p. 6)
2020		**10 million** (agriculture, car washes, shellfish gathering, food service, construction, cleaning, transport/courier and food processing and packaging)		GLAA (2020, October 22, p. 1) GLAA (2021, March 19, p. 1)
2022	1,086	500,000	460	GLAA (2022a, p. 9) GLAA (2022b, p. 9)
2024	1,100	715,000	650	GLAA (2024b)
2025	1,164			GLAA (2025, March 13, p. 10)
GLAA registered worker numbers do not incorporate: The Seasonal Workers Pilot that became the SWVR managed by DEFRA and the HO illustrated earlier in Figure 2.2				

Table 4.28: Licensed Gangmaster and GLAA Registered Worker Data: 2004 - 2025

4.1.6.3.2 UK Census: To count the UK population

Tinsley (2017, December 5) reported how the UK government had chosen to change the way the ONS counts the population by stopping the Census that had run since 1801, and for the ONS to start collecting data via multiple departments. This is very important because this had consequences for not capturing large population data, because and in addition to just prior to the UK Census in 2021 not carried out by the ONS, the ONS reclassified SOC Codes (Standard Occupational Classification) in their Volume 1: structure and descriptions of unit groups (ONS, 2020).

Reclassified SOC Codes by the ONS (2020) from 2010 were manually inputted by ONS expert coders to new SOC Codes 2020. A LFS from 2016 provided occupations for ONS expert coders to input new SOC Codes to identify men in employment and their occupations, separately from women in employment in their occupations. This resulted in an increase of occupational changes from their Major Group 3 to Major Group 2 that resulted in an increase of 2% of men in employment. However, changes to SOC Codes still excludes workers on a ZHC or GLAA workers on a CFS/ZHC because they are incorporated together as total hours on a gangmaster business payroll and do not have their own SIC or SOC Codes in any group.

Questions in the ONS Census Household and Individual Paper questionnaires (ONS, 2020, June) do not provide questions for the inclusion of agency service sector workers in Table 1.1 on a CFS because it is not an employment census. The EAA1973 (s. 5, s. 13(1.a), s. 13(1.b), s. 13(2), s. 13(3)) and ERA1996 (s. 230(3.b), s. 230(5.b)) have ensured all workers on a CFS are included in statistics as employed by businesses. To ensure these workers cannot be located, employment data is not collected from the UK population thus ensuring GLAA workers home or location addresses, their work contracts as a CFS, their transportation information, and GLAA worker deductions and payments from their weekly wages organised by gangmaster businesses are not located or included in any ONS data.

The UK Census is held every 10 years, with the last one held in 2021 (ONS, 2021a) that did not provide questions directly for workers on a CFS as a ZHC. Workers do not understand their employment status and are not able to respond to questions correctly. This would match the information as per the EAA1973 and ERA1996. However, workers are not employed by their licensed gangmasters, and they are not employed by the clients

they provide services for. Although data has flatlined from 2008, service sector workers have not been displayed correctly in data since 1973.

HM Government (2018, December) does not talk about the use of gangmasters and the supply of workers via MSP Models. However, the government does incorrectly incorporate workers in employed statistics because licensed gangmasters as businesses as per the EAA1973 (s. 13(1.b), s. 13(2), s. 13(3)) are declaring high numbers of GLAA workers as employees. Therefore, data collected in all UK Censuses including the UK Census 2021 are not correct and provide a continuation of incorrect statistics.

4.1.6.3.3 Labour Force Survey (LFS)

The UK Labour Force Survey (LFS) content is managed by a steering group that collects data from households and asks for their employment status using an intended choice of words, including placing a ZHC under the term employment, thereby indicating a ZHC as a form of standard employment which is not correct, because the ILO definition in subcategory 4.1.6.3.1 and Table 4.29 defines a ZHC as non-standard employment.

Workers working from a CFS are led to tick boxes for a CoE under the term employment, thereby providing for workers on a CFS as employed. Using the term employment with ZHC, later included under the term employed as part time or full time at the ONS, has created substantial inaccuracies in ONS data.

In 2021 as the LFS sourced ZHC numbers, the ONS changed how they estimated the number of people in employment on ZHCs because ONS methodology suggested they consistently overestimated or underestimated different aged groups of people on ZHC in the UK (ONS, 2021, February 8). Figure 4.3 provides an illustration of ONS methodology for ZHC estimates. This methodology was updated to a Transformed Labour Force Survey (TLFS) in May 2025 (ONS, 2025, April 10).

$$\frac{\text{total people in employment in the UK}}{\text{total people in employment in the UK} - \text{total people in employment in the UK brought forward from previous quarter}}$$

Figure 4.3. ONS Methodology for ZHC estimates (ONS, 2021, February 8)

Nonetheless and prior to May 2025, Figure 4.3 displays ONS methodology to collect ZHC estimates by dividing the total number of people in employment in the UK, by, the total number of people in employment in the UK minus the total number of people in

employment in the UK brought forward from the previous quarter of the same year.

4.1.6.3.4 Business Register and Employment Survey 2015 (BRES)

The Business Register and Employment Survey 2015 (BRES) samples 80,000 businesses annually providing answers used for weighting on the IDBR for GB and NISRA statistics, but agency workers are only included in the BRES survey. Nonetheless, the Office for National Statistics (2016) issued the archived UK BRES 2015 which excludes "agency workers paid directly from the agency payroll" (s. A(9), s. B(2), s. C(7)), which again provides gangmaster stakeholders with the ability to hide gangmasters and subsequently their workers.

The same archived BRES 2015 (The National Archives, 2016, January 5, p. 4) excludes businesses and companies from incorporating agency workers on their payroll as per s.A(9), s.B(2) and s.C(7) because they do not pay them directly and they are not their employees stating in those sections that: "all employees paid directly from this business's payroll(s) including directors and working owners paid via PAYE".

This excludes recruitment agencies, recruitment businesses and gangmasters because they do not employ their agency workers on a CoE. In addition, agency workers are excluded and should not be in the section as workers paid through the payroll in the "Administrative and support service which includes employment agencies" of the earnings and employment from Pay As You Earn Real Time Information, UK: August 2022 (ONS, 2022, August; ONS, 2022, January 24; ONS, 2022, July). This is because recruitment agencies and businesses pay PAYE and NIC on behalf of their agency workers, even though agency workers remain in non-standard employment. This was later confirmed to parliamentary groups in Northern Ireland and England:

> Under section 44 of the Income Tax (Earnings and Pensions) Act 2003, most contractors supplying services via agencies must be treated as employees for income tax and National Insurance contributions (NICs) purposes by the agencies that pay them. These agencies are required to make deductions of income tax and employee NICs, where these are due, from the workers' pay through Pay As You Earn in the same way and at the same level as with direct employees. The agencies will also be liable to pay employer NICs, where these are due, in respect of payments to the workers. HMRC has a risk-based approach

towards compliance activities and will investigate evidence of non-compliance or avoidance.

Agencies must deduct Income Tax and National Insurance Contributions (NICs) at source from payments of earnings to agency workers. HMRC's processes for collecting any Income Tax and NICs from agencies under Pay As You Earn are the same as those for other employers. Where HMRC finds a UK agency has failed to account for Income Tax and NICs in circumstances where the agency rules apply to them, it will usually seek to recover unpaid amounts due from them (GOV.UK, 2016, March 7).

Nonetheless, GLAA Brief Issue 78 - April 2022 CRG (GLAA, 2022, April) incorporates the Apprenticeship Levy to be paid as part of PAYE, and per Employee NIC threshold because GLAA workers are provided by gangmaster service providers for example: A4e apprentices to the Staffline Group PLC (Romero, 2025, February 25) to work from a CFS at the 2 Sisters Food Group. Although the EAA1973 and ERA1996 provides for GLAA workers on a CFS as employed, this is an example of PAYE incorporating GLAA agency workers from recruitment agencies/licensed gangmasters as employees and then subsequently, as 'Employees' in data at the ONS and not as 'Workers' on a CFS or ZHC in non-standard employment data.

4.1.6.3.5 DWP Registration and Population Interaction Database (RAPID)

Further distortions have been created by the DWP Registration and Population Interaction Database (RAPID) that did not measure the international immigration of GLAA workers into service sectors and/or EU citizens reasons for entering the UK. This was not collected because the UK had open border policies and certainly, licensed gangmasters have not shared information with the DWP RAPID because it was not required to do so. GLAA workers have not been counted at air, sea and tunnel ports and in any case, the DWP Database excludes the precariat from the RoI via the CTA through NI, because GLAA workers are able to enter some GB Freeports for Services as per The Windsor Framework: a new way forward (HM Government, 2023, February).

4.1.6.3.6 UK Services Sector

From 2009 the UK Services Sector has significantly grown increasing their share of GDP which offsets UK productivity including manufacturing and retail, which have fallen.

Service sectors account for 81% of total UK economic output and 83% of employment which includes GLAA workers on a CFS as employees (House of Commons Library, 2025, May 22).

The UK workforce illustrated as labour productivity in the workers business and high-level industry from 1998 to 2018 excludes Agriculture and Financial Services data (ONS, 2020, June 1). This is important because workers in the GLAA agriculture and food manufacturing and food processing sectors on a CFS are incorporated in the ONS business sector as total payrolled hours, with this data then incorporated within the non-Financial Services Sector.

The researcher has therefore located GLAA workers that are included in the wrong ONS sector because GLAA registered worker total payrolled hours are excluded from ONS employee data and therefore "do not appear on the payrolls of firms" (Standing, 2011, p, 156). This is because total payrolled hours are totalled in payrolls that then become an invoice to the FMC. Under UK Company Law and Accounting Standards, all private businesses and/or plc companies provide notes to their accounts of the total amount they spend on wages with totalled hours. In addition, licensed gangmasters have not been required to provide their number of employees as workers in Table 1.1 working via SLAs and MSPMs like the researcher's realistic model illustrated in Figure 4.2, thus UK Company Law and Accounting Standards have the ability to place GLAA registered workers as Hidden Incomplete Data for Private Equity.

4.1.6.3.7 Disguised Employment on a CFS

From the enactment of the EAA1973 and subsequent ERA1996, the UK and ONS have CFS data as disguised employment incorrectly disseminated in their statistics.

Figure 4.4 provides an ONS illustration of the number of people in thousands captured by the LFS reporting they are in employment on a ZHC from October 2000 to December 2017. In 2017 the LFS survey results indicated 2.8% totalling 901,000 people were employed on a ZHC which is 4,000 people lower than in December 2016 where 2.8% of people totalling 905,000 people were reported as employed on a ZHC, showing connections between MSPMs and ONS data. It is important to note the increase in people that reported to be on a ZHC from 2011 (ONS, 2018, April 23).

Figure 4.5 (p. 198) provides an ONS illustration of the share of total employees on Not Guaranteed Hour Contracts (NGHCs) across industries showing variations of 7.6%

employees in N Administration and Support Services, compared with 6% in A-E Production with Agriculture (ONS, 2018, April 23a).

However, this sector includes employees as self-employed or as an employee working for a gangmaster. A ZHC or CFS is not included under the term employment as per subcategory 4.1.6.3.1. In addition, there are no food production/manufacturing and food processing sectors on the LFS or at the ONS. This is significant because the LFS and ONS estimates do not include GLAA workers on a CFS, therefore providing disguised employment of workers on a CFS/ZHC with food manufacturing and food processing sectors not identifiable or not included correctly in ONS statistics (GLAA, 2022, August 23; GLAA, personal communication, September 8, 2022a; GLAA, personal communication, September 8, 2022b).

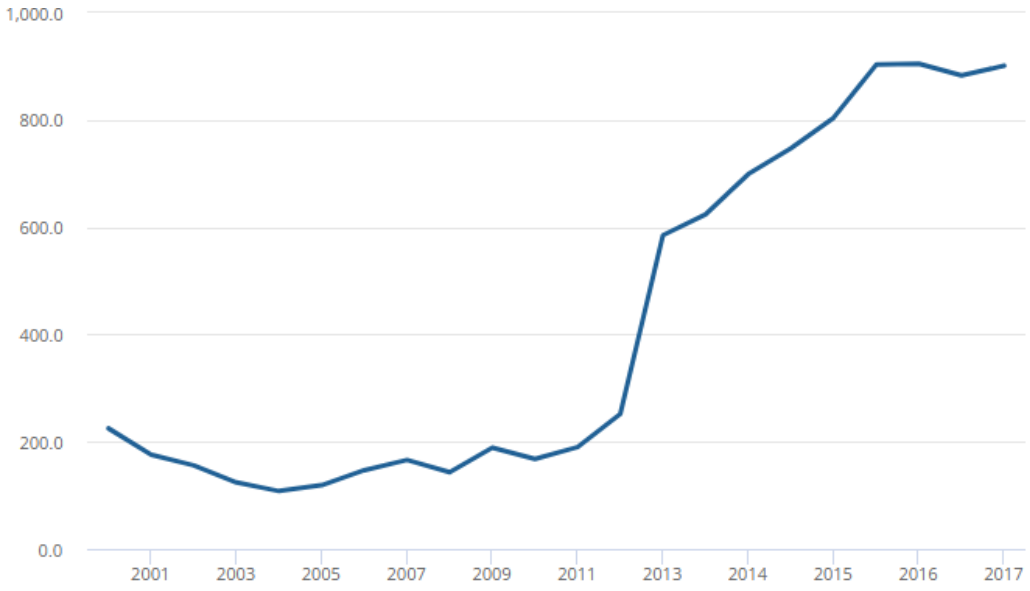

Figure 4.4. Number of people in employment reporting they are on a Zero Hour Contract, October 2000 to December 2017 (ONS, 2018, April 23)

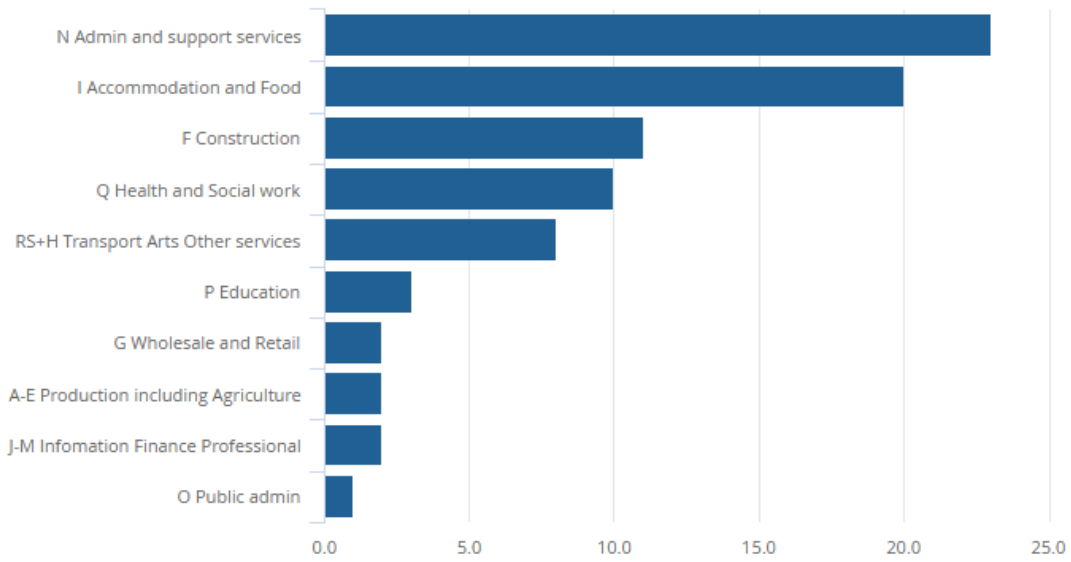

Figure 4.5. Percentage (%) of employees on contracts that do not guarantee a minimum number of hours (NGHCs), by industry, ranked highest to lowest, November 2017 (ONS, 2018, April 23a)

Following the implementation of any realistic MSPM (Figure 4.2), Figure 4.6 (ONS, 2018, November 8) illustrates the high level of growth of the non-Financial Services Industries from 2011, in comparison to Production Industries, Construction Industries and Distribution Industries, with the non-Financial Service Industries benefiting from the incorporation of GLAA workers as an asset. This growth matches the growth of employees in employment reporting they are on a ZHC in Figure 4.4 (ONS, 2018, April 23), the growth in Admin and Support Services in Figure 4.5 (ONS, 2018, April 23a) and the increases identified in Figures 4.6, 4.7, 4.8 and 4.9 whereby the non-Financial Service Business economy has increased. GLAA payrolled invoices increase the non-Financial Services Sector that include Sections "H - Transport and storage; I - Accommodation and food service activities; J - Information and communication; L - Real estate activities; M - Professional, scientific and technical activities; N - Administrative and support service activities; P (part) - Education; Q - (part) Human health and social work activities; R - Arts, entertainment and recreation; and S - Other service activities" (ONS, 2018, November 8a). The largest contributors to non-Financial Services are Sections M, J and N with Section M the largest contributor to the non-Financial Services Sector.

UK gangmaster businesses use a variety of SIC Codes displayed in Table 4.9. This confirms economic activities by way of wrong SIC Codes and no Agriculture sector, and then incorrectly absorbed at the ONS illustrated in Figure 4.6 as the Production industries,

providing for the highest growth in non-Financial Services Sections M, J and N illustrated in Figure 4.7, because GLAA workers incorporated in total payrolled hours in the gangmaster business sector have not been included. To explain further:

Section M includes SIC 70229 applied by global financial companies linked to licensed gangmasters, and licensed gangmasters directly as per Table 4.9.

Section J includes SIC 62090 whereby global technology companies provide AMTs to be applied to workers for example the AMT worn by GLAA workers that monitors their performance as per Appendix 4.2 and a respondent in Survey Question 6.

Section N includes SIC Codes 78109, 78200, 78300 and 82990 that are applied by licensed gangmasters.

As increasing numbers of GLAA workers [GLAAC3] are purchased with no guaranteed hours, employee incomes have fallen because employee hours have not been included at the ONS, causing the UK to flatline.

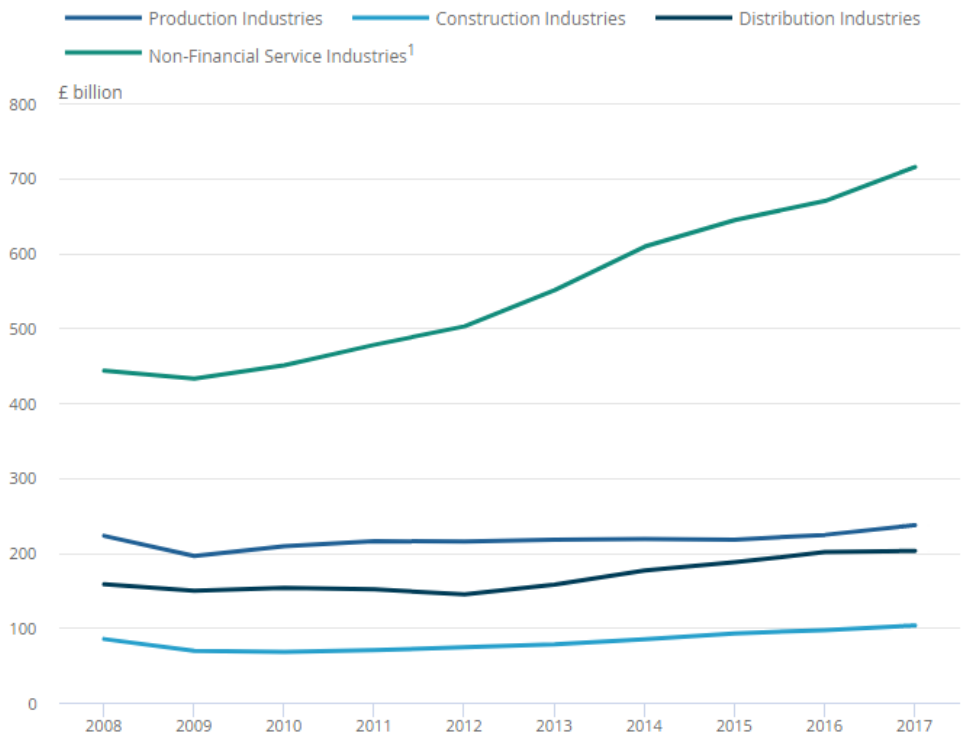

Figure 4.6. UK non-Financial business economy, aGVA by sector, 2008-2017 (ONS, 2018, November 8)

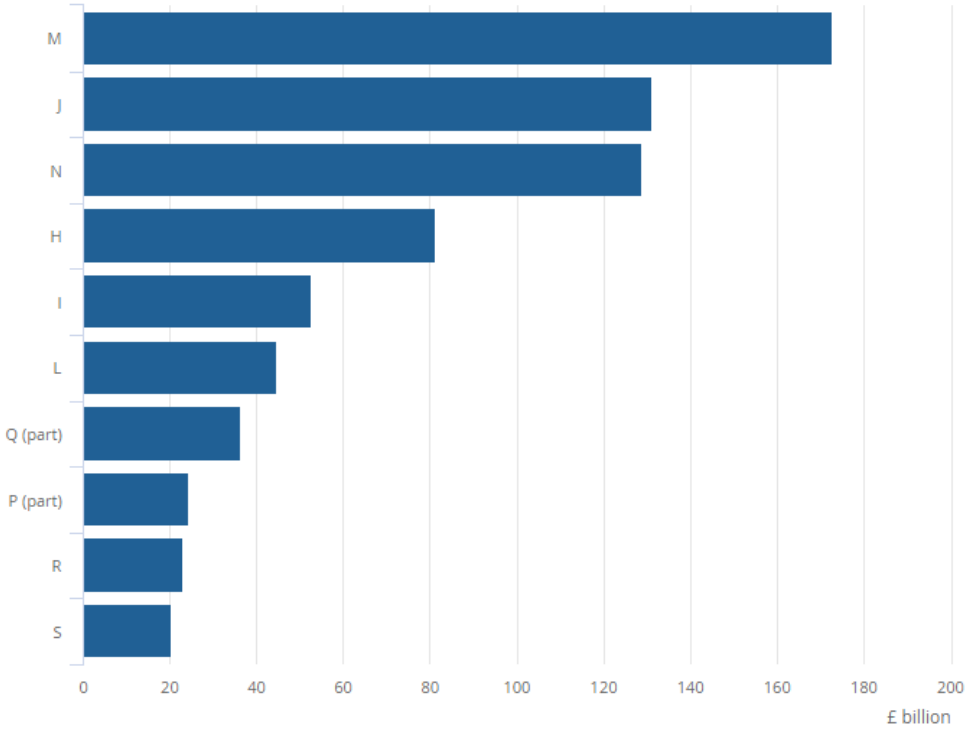

Figure 4.7. UK, non-Financial services, aGVA by section, 2017
(ONS, 2018, November 8a)

The UK Financial Services Sector is propped up by gangmaster public service frameworks, and the use of GLAA/MSPMs in the UK economy in both the private and public sectors, thus providing the continuation of economic activities and modes of supply incorrectly aligned for the Office for National Statistics (2021b).

The researcher provides Figure 4.8 to assist the reader with how Private Equity generated from Payrolled GLAA workers [GLAAC3] in the Financial Services Sector are HIDden, with data in relation to for example, licensed gangmaster transport and food manufacturing and food processing sectors that avoid ONS statistics.

Figure 4.8 illustrates firstly the existence of MSPMs shared by the REC, although a realistic MSPM is illustrated by the researcher in Figure 4.2. However, the application of the EAA1973 (s. 13(1.b), s. 13(2), s. 13(3)) that provides for GLAA workers to remain as a commodity for their gangmaster is not shared. MSP Models applied with GLAA registered worker data is not provided to the ONS by the GLAA (Table 4.28).

Secondly, payrolled invoices from Licensed Gangmasters to their FMCs are not checked by HMRC and Accountancy Services and in fact, licensed gangmaster MSPM payrolled invoices under UK Company Law and Accounting Standards count total payrolled hours

not worker numbers. Income is generated as per Appendices 2.1, 2.2 and 4.11 for profitalisation as Private Equity. This information avoids the ONS because it is not charged to FMCs, but is collected as a deduction or payment from the GLAA worker separately.

The realistic concept of a CFS/ZHCM (Figure 2.3) operates in the researcher's second realistic model illustrated as the gangmaster paymaster MSP Model (Figure 4.2) and as per subcategory 4.1.3.2.4, supplemented by the ALP that describe legal definitions for HMRC NMW purposes of Deductions and Payments as important in subcategory 4.1.3.2.4. In relation to Figure 4.2, the researcher provides Appendix 4.11 as an example of some legal deductions and a legal payment deducted or paid by GLAA workers as per GLAA CRG, with deductions and payments then identified/shown on workers weekly payslips, in an example of a 5-day week payroll for GLAA worker services paid directly by recruitment managers in the GDMR (Findlay and McCollum, 2013).

Third, VAT and PAYE licensed gangmasters do not provide all data in relation to their workers as per the IDBR. The ONS therefore does not receive all information in relation to all workers provided by licensed gangmasters in their MSP Models.

This is supplemented by Companies House and the GLAA that provide a protective screen to gangmaster businesses in the business economy, for the GLAA to provide a platform for licensed gangmasters and gangmaster abilities to for example apply the use of TUPE to purchase and/or sell workers that are not employed in modern day slavery [TUPE is not recognised in UK law for tax and NIC purposes and is therefore not included in Appendix 1.1], and to carry out mergers, acquisitions and takeovers of/with other gangmaster businesses (GLA, 2010, June).

Fourth, gangmaster sectors do not have their own sector at the ONS. Free market liberalism with DEFRA, the Home Office, the GLA and now the GLAA, are directly responsible for loopholes and changes in legislation that have provided their gangmaster paymasters with the ability for GLAA workers to be absorbed and obscured from view as Hidden Incomplete Data at the ONS.

Finally, the GLAA does not pass their registered worker data to the ONS illustrated in Table 4.28, including the colossal number of 10 million GLAA registered workers identified by the GLA in 2017 when the GLA was the GLAA (GLA, 2018, July 19, p. 1) and by the GLAA in 2020 (GLAA, 2020, October 22, p. 1).

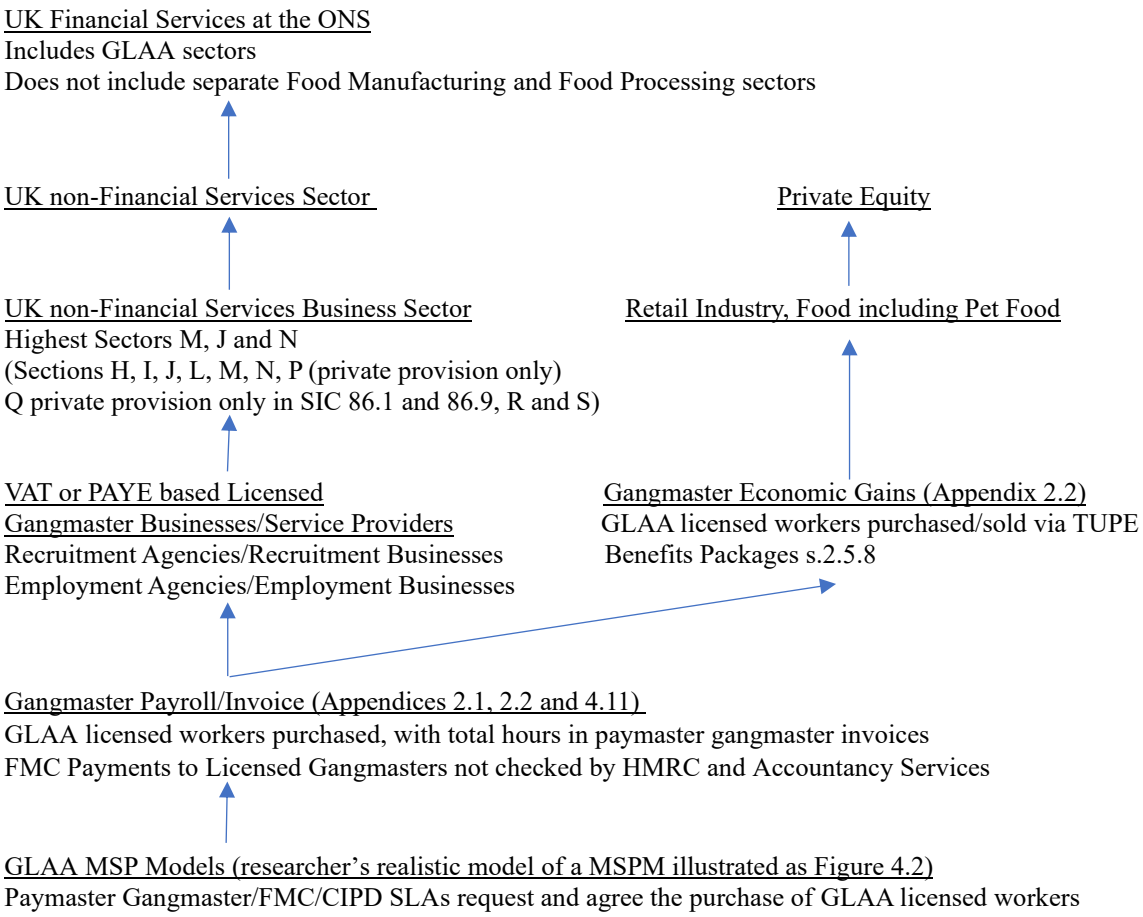

Figure 4.8. Payrolled GLAA workers in the Financial Services Sector

Pre-Brexit, workers could enter or be transported via gangmaster businesses into GB via NI and the RoI, and via UK ports, airports and in private coaches, helicopters and aircraft, the Eurotunnel and Eurostar directly into UK business, industry and trade including the Retail Sector via Freeports and Investment Zones that include a variety of financial incentives established firstly in Enterprise Zones, as a 'meat product' in goods, then absorbed as an asset in services. This is also confirmed by 17 respondents in Survey Questions 1, 2 and 3. This would include the successful pet food sector at best described as follows:

Figure 4.9 provides an illustration of ONS Prepared Pet Food statistics, whereby meat products are imported into UK Freeports saving high tariffs. Prepared 'meat products' incorporate GLAA workers in the concept of the precariat because 'food processing' costs are not clear, but they are incorporated in this subcategory as per "pet food and products for the manufacture of pet food", as low risk animal by-products are categorised under the Border Target Operating Model (BTOM) (GOV.UK, 2025, March 26).

This is because low risk animal by-products include products for pet food, and thus food processing costs which includes GLAA workers. These GLAA workers were provided via legal migration totalling approximately 800,000 in 2022, followed by further increased migration to over one million in 2023 (ONS, 2024, November 28). These colossal migration figures are illustrated as 'value added' in 'prepared pet foods' showing an increase from 120.2 in May 2022 to 126.1 in June 2022, with a similar increase from 127.5 in January 2023 to 136.9 in February 2023 (ONS, 2023, December 20).

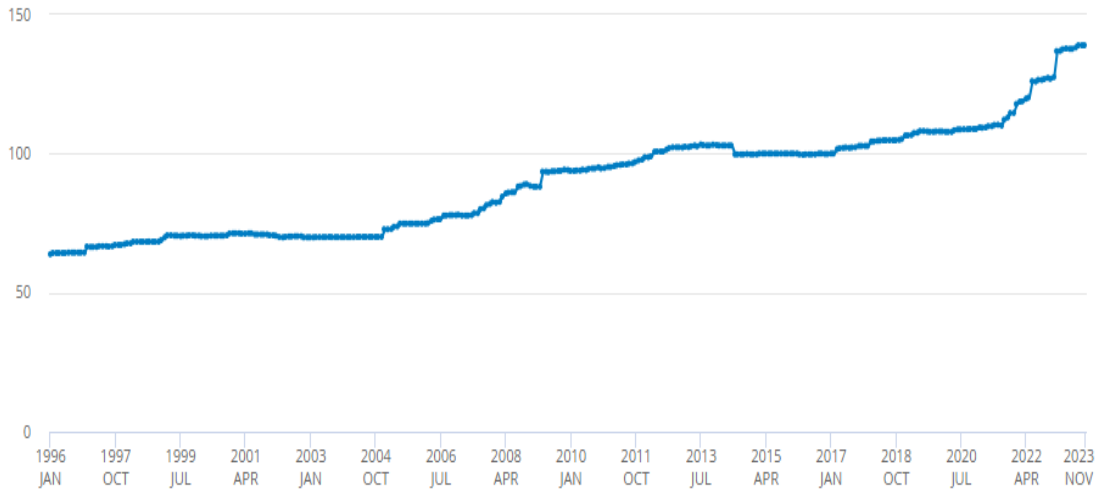

Figure 4.9. PPI Index Output Domestic – C1092 Prepared Pet Foods 2015=100 (ONS, 2023, December 20)

GLAA food manufacturers and food processors also sit outside Freeports and do not seek to relocate into Freeports to acquire the same benefits. It is therefore likely food manufacturing and food processing sectors simply purchase their workers via an SLA from licensed gangmasters who apply their MSP Models. Licensed gangmasters are able to purchase workers who can travel in and out of UK Freeports and Investment Zones, to other manufacturing industries and other sectors, all incorporated within Goods for Services and then HIDden in payrolled invoices (ONS, 2025, July 17).

This would include the successful Pet Food subsector that is able to produce value added canned dog food incorporated within the Retail Sector based within manufacturing sites both inside and outside existing Freeports and Investment Zones and future Freeports and Investment Zones. This is because GLAA workers have been transported or taken by licensed gangmasters to work in the pet food subsector and their payrolled hours are not

disclosed correctly, and in any case, pet food is a subsector of food manufacturing and food processing that does not have its own sector at the ONS. To help explain this, Figure 4.11 provides Section K at the ONS (2019, April 2), whereby activities of financial services holding companies and activities of other holding companies SIC 64205 and 64209 that acquire portfolios of food companies and thus GLAA workers in their remit, are able to add value to the retail sector in manufacturing sites, plus food manufacturing and food processing that do not have their own sector via holding companies. This also explains links between licensed gangmaster SIC Codes and global partnerships in Table 4.9 and Appendix 4.12.

4.1.6.3.8 Republic of Ireland: Central Statistics Office (CSO)

The Northern Ireland Department for Justice is responsible for NI Modern Slavery and Human Trafficking strategies, with NI Police Services (PSNI) Modern Slavery and Human Trafficking Unit investigating modern slavery. In Northern Ireland, the GLAA has two LAPOs to investigate worker exploitation, tax evasion and H&S negligence. This is important because just two GLAA LAPOs are unlikely to suspect or locate gangmasters operating illegally and in any case, they have no PACE powers to operate in NI, therefore, open borders via the RoI CTA and NI into GB provide for the free movement of GLAA workers.

Great Britain and Northern Ireland employment statistics are supported by the RoI Central Statistics Office (CSO) (2023, October 17) which provide the difference of employment statistics in the RoI between 1973 and 2022. Figure 4.10 reveals the enormous reduction of employment in Agriculture and Industry in the RoI replaced by the immense growth in employment in Services from 44% to 77% (Central Statistics Office, 2023, October 17). This is the same as a similar trend in the UK because employment has also moved from Agriculture and Industry to Services. This is extremely important because employees in the RoI have also been replaced with workers in the concept of the precariat (Standing, 2011). In addition, the RoI CSO does not provide information as to what type of contract their citizens are employed for example a CoE, CFS/ZHC or ZHC or any employment data that separates employees and workers into CoE, CFS/ZHC or ZHC separate data, thus providing gangmasters in the EU and RoI with the ability to transport or to encourage the movement of workers via the RoI/NI CTA into NI and GB.

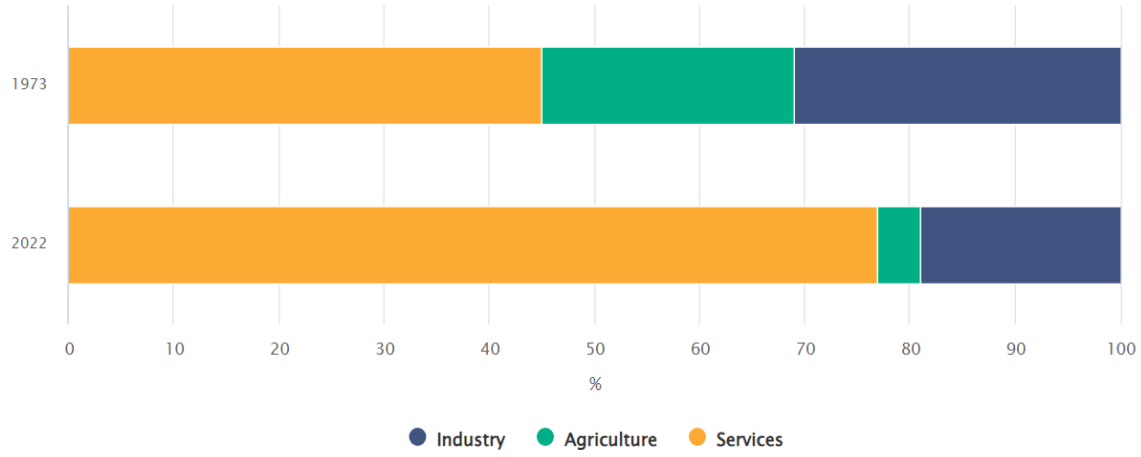

Figure 4.10. RoI: Employment by broad economic activity sector (Central Statistics Office, 2023, October 17)

4.1.6.3.9 Companies House: Food Manufacturing, Food Processing, Gangmaster Business Data and their SIC Codes

The UK government is responsible for ensuring global and national food businesses, food companies and gangmaster businesses including those that surface with mergers and acquisitions including trading companies, register with Companies House with correct and adequate SIC and SOC Codes, thus enabling dissemination of their data correctly into manufacturing and other sectors, and additional subsectors including data from gangmaster businesses.

In relation to gangmaster businesses and comments above, GLA Brief Issue 6 (GLA, 2010, June) now removed from observation on the GLAA website, has exacerbated and provided for the expansion of licensed gangmaster businesses, by providing for unknown numbers of global financiers via mergers and acquisitions acquiring food supply chains with GLAA licensed gangmasters, with one GLAA license that is able to absorb and hide unknown numbers of additional gangmaster businesses registered or not registered at Companies House i.e., “companies with multiple branches can still be covered by one license provided the branches are part of the same single business entity”, with the food manufacturing and food processing sectors and GLAA workers subsequently not identifiable in ONS data.

Figure 4.11 provides Financial Services data from 2008 to 2018 with the food supply chain including GLAA workers [GLAAC3], and transport drivers [GLAAC2] and the self-employed worker as [GLAAC4] all illustrated in Table 1.1, that are incorporated

within service statistics and Financial Services statistics, adding value for activities of financial services holding companies and activities of other holding companies SIC 64205 and 64209 that acquire portfolios of food companies and thus GLAA workers in their remit, for example, EQT Partners SIC 64205 that have merged and acquired new business including the purchase of the SSP Food Service company in 2006 that includes outlets such as "Caffe Ritazza, Upper Crust and Bonne Journee and franchised brands such as Marks and Spencer, Starbucks and Burger King" in the UK (EQT, 2006; RSS Global, 2024; Twenty 20 Capital, 2024). This is followed by Figure 4.12 that identifies capital deepening in the UK with the GVA p.h. worked alongside low capital productivity as the UK flatlines.

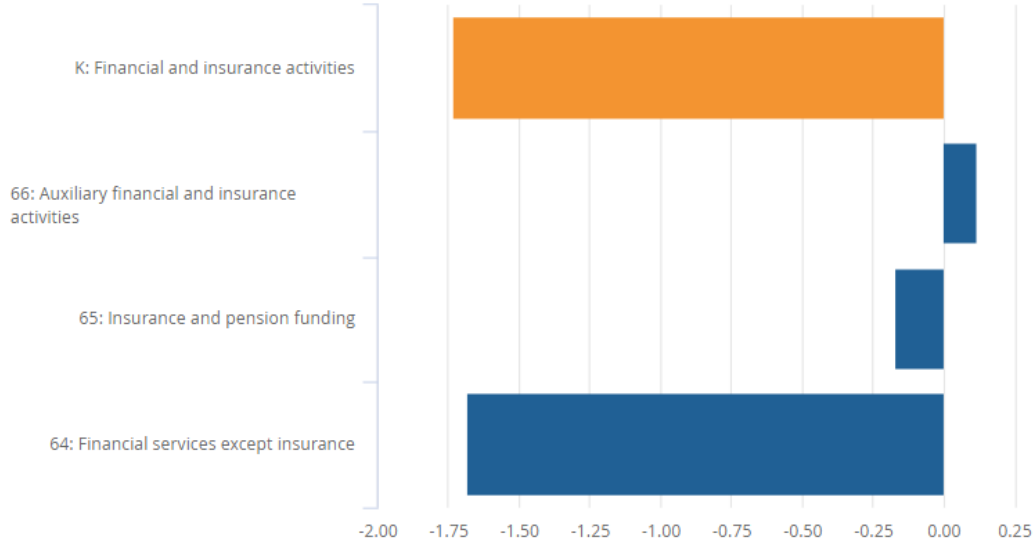

Figure 4.11. Financial and insurance activities, 2008-2018 (ONS, 2019, April 2)

Companies House five-digit SIC Codes are therefore used correctly but inadequately as illustrated in Table 4.9 and Figure 4.7. Companies House Corporate Records include global, european and national food franchised brands such as Marks and Spencer SIC Code 47190 and Tesco SIC Code 47110, that receive a variety of readymade short shelf meals and sandwiches, that are supplied for example by food manufacturing and food processing companies including the 2 Sisters Food Group SIC Code 10120 as a poultry business, that does not include a SIC Code for its short shelf food manufacturing and processing divisions. This provides an example of a food manufacturing and food processing company in the GLAA food manufacturing and food processing sectors that

cannot be located at the ONS. Global, european and national franchised brands including Marks and Spencer, supermarkets and food manufacturing and food processing companies have Reporting Units (RUs) around the UK providing their employee data to the ONS, but they are not required to provide information with regard to any SLAs or known information as part of a MSP Model with any licensed gangmaster, whilst at the same time, the ONS has no knowledge of any MSP Models, and therefore does not collate GLAA worker informative data separately, and therefore does not identify any mis-allocations or calculations of GLAA worker data.

This is described further by the ONS (personal communication, August 25, 2022) who are not able to locate GLAA workers in industry data or VAT/PAYE data, even though FMCs have Reporting Units (RUs) around the UK. The ONS provide Birdseye, and their head office SIC Codes as an example of a FMC registered correctly with SIC Codes at Companies House (ONS, personal communication, August 25, 2022).

Appendix 4.12 provides the researcher's illustration of a variety of food manufacturing companies and businesses whereby Company SIC Codes are applied for example, international and national companies DHL International (UK) Ltd SIC 96090 and Bakkavor Ltd SIC 82990. Some international and national companies incorporate flexible finance for Artificial Intelligence (AI), robotic process automation, block chain and big data. Thus, there is a lack of data allocated to Companies House and thus ONS statistics that facilitate some GLAA sectors, because RUs provide employee data and do not provide GLAA worker data as per any SLA the food manufacturing and food processing company has agreed with a licensed gangmaster (ONS, personal communication, August 25, 2022), and the ONS IDBR system does not request all GLAA worker data from licensed gangmasters, but then again, the IDBR system only collects data one day per year.

The researcher's illustration in Appendix 4.12 locates GLAA workers in food supply chains with their licensed gangmasters, assisted by neoliberalism, supermarkets and food manufacturing and food processing companies explained earlier in subcategory 4.1.6.3.7 as per Figure 4.4 (ONS, 2018, April 23), Figure 4.5 (ONS, 2018, April 23a), specifically via Companies House Sections M, J, N, and Section K (ONS, 2019, April 2), linked to global partnerships in Table 4.9, and via Figure 4.9 with value added to "pet food and products for the manufacture of pet food" (GOV.UK, 2025, March 26; ONS, 2023, December 20).

Licensed gangmasters in food manufacturing and food processing service sectors in food supply chains with the researcher's realistic MSP Model applied (Figure 4.2), has helped the researcher alongside data collated from the REC and ALP in Table 4.25, Table 4.26 and Table 4.27, that in turn fund SLAs between FMCs and thus their supermarket or retailer for example Marks and Spencer and Tesco. Supermarkets apply one SIC Code at Companies House for example SIC Code 47190, instead of accurately applying multiple SIC Codes that would provide a full description of their business. Thus, they provide no information and no identification of sections of their supply chains where GLAA workers could be located, and where profitalisation is created for Private Equity.

Global and european businesses and companies alongside UK based businesses and companies with people employed or working in non-standard employment but incorporated in statistics as employed, should match data produced by the UK ONS of businesses and companies.

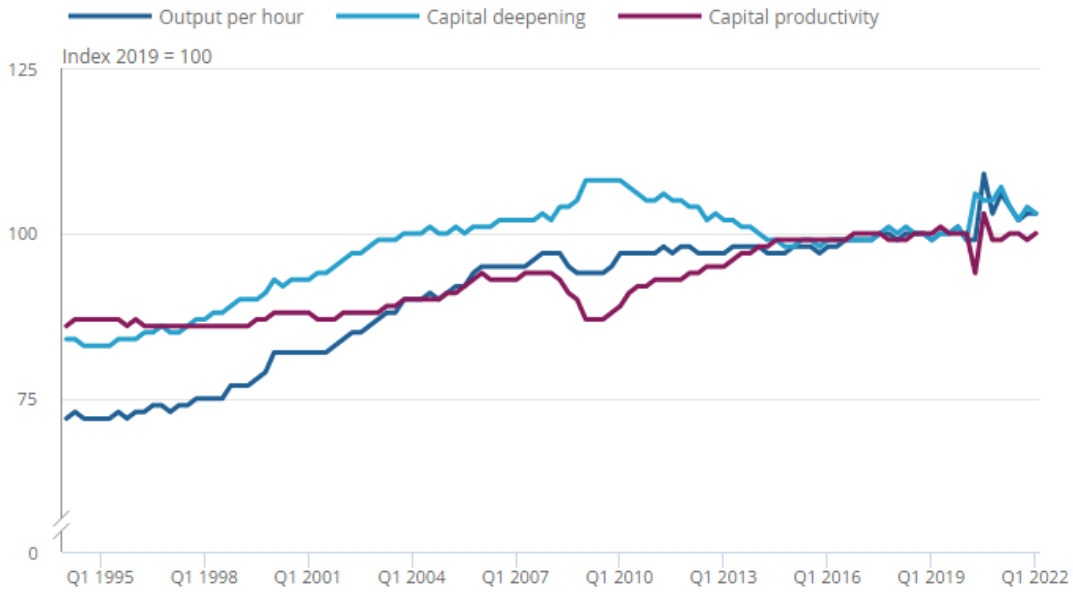

Figure 4.12. Capital Deepening, GVA p.h. worked and capital productivity UK, index=2019, Quarter 1 (Jan to Mar) 1994 to Quarter 1, 2022 (ONS, 2022, July 7.1)

The archived BRES 2015 (p. 4) (The National Archives, 2016, January 5) excludes agency workers in s.A(9), s.B(2) and s.C(7), therefore businesses and companies should not include them as employees in the latter or via PAYE, and this includes recruitment agencies, recruitment businesses and gangmasters. Besides, GLAA Brief Issue 78 - April

2022 CRG (GLAA, 2022, April and Appendix 2.1) and the UK government (GOV.UK, 2022, September 6) advise employment and recruitment agencies and licensed and unlicensed gangmasters to pay the Apprenticeship Levy as part of their PAYE bill, because the EAA1973 includes GLAA workers on a CFS as employees.

4.1.6.3.10 House of Commons: Statistical Data of Jobs for Employees and GLAA Workers

The House of Commons collects statistical data from the Purchasing Managers Index by S&P Global (2022), who in turn collect statistical data on behalf of the UK government from two private sector companies: KPMG and the REC, who work together to provide jobs data in a non-substantial regulatory divergence tracker (News Release, 2022, January 13a; News Release, 2022, January 13b). IHS Markit collects data of jobs in surveys from gangmasters in the North of England including Yorkshire and the Humber. Data is then sent to suppliers of services including recruitment consultancies who incorporate service providers, enterprise providers, group training associations, facilities companies, facilities services, employment and recruitment agencies and businesses and GLAA licensed gangmasters, who apply a CFS and as per the EAA1973 (s. 13(1.a), s. 13(1.b), s. 13(2), s. 13(3)).

4.1.6.3.11 Located GLAA Registered Workers

Some GLAA workers are included as part of PAYE but are not incorporated in UK ONS statistics correctly for a number of reasons:

- Gangmaster stakeholders have not shared their application of the CFS in any MSP Models (Figure 4.2) with the ONS
- The ONS uses limited surveys to estimate numbers of workers on ZHCs including the archived BRES 2015 survey in GB and NI
- The IDBR matches to licensed gangmasters as businesses but only matches to the number of workers the licensed gangmaster business provides to the IDBR PAYE system (ONS, 2022, August 2)
- The ONS does not collect registered worker data from the GLAA and there is no evidence to suggest the National Statistician and CE of the ONS chose to investigate this further
- The GLAA does not provide the ONS with their registered worker data as per Table 4.28, and there is no evidence to suggest the ONS National Statistician chose to investigate this further.

GLAA workers are incorrectly included as employees and they are not all provided to the ONS as per the IDBR, which explains data collated together in Table 4.28 but not provided to the ONS and in any case, the ONS indicates employees totalling 75.5% in June 2022 with data derived from the LFS which collects data from households without a section for workers on a CFS as per subcategory 4.1.6.3.3 and the ONS (2022, November 15), and as payrolled employees totalling 30,265,512 million in June 2025 in Figure 4.13 (ONS, 2025, July 17). This includes GLAA workers as per limited surveys and ONS flash estimates of the LFS and the BRES (ONS, personal communication, August 3, 2022; ONS, personal communication, August 4, 2022; ONS, personal communication, August 26, 2022).

ONS statistical data of Employment and non-Standard Employment is not correct. To explain this further, the researcher provides Employment as Standard Employment and as an Employee on a CoE, and non-Standard Employment as Not an Employee but as a Worker working from a ZHC, CFS/ZHC or as an Apprentice in the researcher's Table 4.29.

Nonetheless, the ONS incorporates the precariat on a CFS illustrated in Figure 4.13 as a payrolled employee, with data gathered together from the PAYE RTI system via HMRC, even though the ONS indicated they manage their IDBR PAYE system (ONS, personal communication, August 25, 2022).

Figure 4.13. Payrolled employees, seasonally adjusted, UK, July 2014 to June 2025 (ONS, 2025, July 17)

It is therefore not clear what differences the ONS and HMRC have with regard to PAYE information, because the ONS indicate they collect PAYE information from licensed gangmaster businesses as per their IDBR PAYE system, but then display HMRC PAYE data as per Figure 4.13.

GLAA workers are therefore not incorporated correctly as defined in subcategory 4.1.6.3.11 and Table 4.29 (p. 214), because they are not employed with any guaranteed hours in the services section, and their hours worked have not been added to employed hours in different manufacturing subsectors, supplemented by the fact that food manufacturing and food processing do not have their own sectors at the ONS. Some payrolled employees may have only worked 6 hours one week, 22 hours the second week, 12 hours the third week, 38 hours the fourth week and no hours the fifth and would be entitled to Universal Credit, although some international and EU workers have NRPF (GOV.UK, 2025, January 14; Standing, 2011).

This aligns with the researcher's GLAA worker survey responses in Appendices 4.1 to 4.8 whereby respondents in Survey Question 4 confirmed they had many jobs at the same time, Survey Question 13 whereby respondents had varying hours of work, with Survey Question 8 responses showing workers lack understanding of their contract types. Businesses and companies also inaccurately include the precariat as employees in the archived Business Register and Employment Survey 2015 on p. 4 (s. A(9), s. B(2), s. C(7)) located in The National Archives (2016, January 5). Also, manufacturers and the private sector do not engage with Invest Northern Ireland (2025) that collects employee statistics and subsequently provides their statistics to the ONS.

Nonetheless, historical GLAA registered worker data in Table 4.28 has been examined in subcategory 4.1.6.3.1 displaying the huge increase in gangmaster licenses in 2012 (GLA, 2010, April 21b; GLA, 2012, June 27, p. 43) and an enormous jump in GLAA registered worker data to 10 million provided by the GLA (2018, July 19) and the GLAA (2020, October 22). However, the ONS have confirmed they did not collect GLAA registered worker data from the GLAA and advised the researcher to contact the GLAA for data (ONS, personal communication, August 18, 2022) even though as a registered government body they should do.

Nonetheless the RoI CSO (2023, October 17) statistics align with UK ONS statistics whereby both sets of statistics show an enormous reduction of employment in Agriculture and Industry that is replaced by an immense growth in employment in Services.

In any case, the ONS show their failure to grasp any understanding of licensed and unlicensed gangmasters (ONS, personal communication, August 26, 2022) whereby the ONS state that:

> *supplying labour in a way is illegal, I would imagine that those businesses supplying the labour are not on the IDBR and those that are licensed are and their employees need to fulfil the criteria. It might be possible that there are unlicensed businesses on the IDBR but if we knew that, we'd be telling the GLAA. It would seem that unlicensed gangmasters would be supplying contingent labour illegally and therefore, we would not be reporting their employment estimates* (ONS, personal communication, August 26, 2022).

Table 4.28 identifies Standard Employment and non-Standard forms of Employment at the ONS. The ONS does not separate service sectors and does not collect all data, because not all data is provided by all licensed gangmaster businesses as per service sectors separately via the IDBR. GLAA registered worker numbers and GLAA worker demographics are not collected via FATS and are not supplied by Service Sector Providers, Enterprise Companies, Learning Enterprise Partners, Apprenticeship Training Providers, Group Training Associations, facilities companies, services and employment agencies, recruitment agencies and/or GLAA licensed gangmaster businesses to the ONS and in any case, the ONS have confirmed they do not collect GLAA registered worker data from unlicensed gangmasters (ONS, personal communication, August 26, 2022) for example, Cordant in Table 4.9. It is also not clear if the ONS collects from licensed gangmasters governed by Guernsey laws for example Blue Arrow in Table 4.9, even though GLAA worker numbers are displayed by the GLAA in Table 4.28.

In any case, the ONS have confirmed their IDBR PAYE system matches to reference numbers of licensed gangmasters as businesses. Therefore, the ONS IDBR PAYE system will not match to GLAA workers who work on a CFS in any MSP Models similar to the researcher's realistic model as Figure 4.2, because GLAA workers are not employed and their licensed gangmaster does not provide the ONS IDBR system with all their data of workers because many GLAA workers have worked less than the required PAYE hours for NICs (ONS, 2022, August 2).

Table 4.29 therefore provides information gathered together to identify Standard Employment and non-Standard Employment at the ONS, with Employment as Standard Employment and as an Employee on a CoE, and non-Standard Employment as not an Employee but as a Worker working from a ZHC, CFS/ZHC, or as an Apprentice. Information has been gathered together for Table 4.29 from the ONS BRES 2015 (s. A(9),

s. B(2), s. C(7)), the ONS LFS, Jack and Whiting (2014, July 11a), Jack and Whiting (2014, July 11b) and the Office of Tax Simplification (2015, March).

Table 4.29 thus identifies how some employees in the Standard Employed column should be moved into the non-Standard form of Employment column because they are not Employed as per the BRES 2015 s.A(9), s.B(2), s.C(7) which excludes agency workers, the LFS, Eurofound (2021, March 11), the GLA (2010, April 21a), GLA (2012, January), GOV.UK (2021, May 4), GOV.UK (2025c), GOV.UK (2025d), GOV.UK (2025, April 9), the ILO (2016) and subcategory 2.2.2.

Standard Employment means Employees on a CoE with an Employer, with Guaranteed hours of work, Employment conditions, rights, responsibilities and duties.

Non-Standard Employment means people are not employed on a CoE and do not have an employer with guaranteed hours of work and are therefore workers on a ZHC, CFS/ZHC or are an Apprentice.

Therefore, the 30,265,512 million payrolled employees in Figure 4.13 (ONS, 2025, July 17) are GLAA workers in Table 1.1 on a CFS/ZHC, and their employment status is that of a Worker/Agency Worker in non-Standard Employment illustrated below:

ONS: Standard Employment and non-Standard forms of Employment	
Employment	non-Standard forms of Employment
Person EMPLOYED by an EMPLOYER are an EMPLOYEE on a CoE and have: An Employer Guaranteed Hours of Work Employment Conditions Employment Rights Employment Responsibilities Employment Duties	Person NOT EMPLOYED are therefore a WORKER on a ZHC or CFS. Workers have: No Employer No Guaranteed Hours of Work
CoE Full Time Employee	ZHC Agency Worker
CoE Part Time Employee	Apprenticeship Worker
CoE Fixed Term Employee	CFS Worker includes GLAA Workers in the concept of the 'Precariat' in Table 1.1
Apprenticeship Employee	
CFS Employee includes GLAA Workers in the concept of the 'Precariat' in Table 1.1	

Table 4.29: Standard Employment and non-Standard forms of Employment at the ONS

4.2 Summary of Chapter 4

The Work Plan of Stages and Tasks in Appendix 3.1 was crucial for this research because it not only provided a roadmap, the stages and tasks assisted the researcher with the organisation and management of all data. All data has now been drawn together, integrated, cross validated and displayed visually. These displays enable the researcher to discuss unobserved social constructs with critical realism in Chapter 5 as the Discussions chapter.

Findings have been unravelled and pieced together, enabling the researcher to provide their discussion of the 'real' world and the researcher's real 'observable' world (Bhaskar, 2008) for government, treasury, finance, economic, food manufacturing, food processing, agriculture and social policy making.

CHAPTER 5: Discussion

5.1 Introduction

Phase 4 continues with Chapter 5 that provides a Discussion of the Findings in Chapter 4 that identified themes, relationships, and key concepts (Appendix 4.9). Chapter 4 subchapters ranging from 4.1.3.2.3 to 4.1.3.2.5, helped support the researcher's realistic design of a GLAA/MSPM (Figure 4.2). Subchapters ranging from 4.1.3 to 4.1.6 provide additional data to support the researcher's themes, relationships, and key concepts, as text and critical realism are linked together to describe the unspecified structures of the licensed gangmaster sectors in the remit of the GLAA, and its lack of governance in the 'real' world to the researcher's real 'observable' world (Bhaskar, 2008).

This research offers a new perspective of the GLAA and workers [GLAAC3] in their remit, and opens with subchapter 5.2 with Research Objective 1, followed by two further subchapters that discuss Findings for Research Objective 2 and Research Objective 3.

5.2 Phase 4: RO 1. Investigate the GLAA history, statutory and functional role to regulate labour to the service sectors within its remit in the UK

5.2.1 Discussion of GLAA Historical Data

European Union historical legislation loosely applied in the UK provides loopholes for the free movement of GLAA workers, illustrated as Figure 1.1 and Appendix 1.1. The substantial amount of legislation that has not been applied to the GLAA for example in Appendix 2.1, is supported by some pieces of legislation that do not apply in the same way to all four nations. Therefore some pieces of legislation provide for the free movement of migrant workers for example via the CTA between the RoI and NI into GB where no documents are produced (GLAA, 2023) with the same workers provided with transport across borders (Tuckman, 2010; Wilkinson, 2012), supported by recent legislation for example the Industrial Relations (Amendment) Act 2015 s.43, Applicability Motion Regulation (EU) 2023/2419 and The Windsor Framework (Democratic Scrutiny) Regulations 2023.

Following the application of the EAA1973 as the UK entered the EU and then subsequently left the EU five decades later, and following the 2008-2009 financial crisis, regions including Yorkshire and the Humber, now have economic disparities with poor performing councils and poor performing public services that have been shorted by neoliberalism, that have caused debt, dissent, deprivation, poor health and real poorness

in a Cost of Living crisis, with successive governments creating a very poor society predominantly in the North of the UK. To assist the reader throughout this thesis, the researcher provided their realistic model of a MSP Model (Figure 4.2). MSP Models identified by the REC in Table 4.26, have not been shared by governments and are a direct problem and a response to GLAA registered workers providing Hidden Incomplete Data as employees in employment (ONS, 2025, July 17), and in failed growth models, master plans and strategies that have been applied in GLAA sectors including food manufacturing and food processing.

Historical data shows that post Brexit, the Windsor Framework was applied alongside the UK-EU and EAEC Trade and Cooperation Agreement No. 8/2021, providing new foundations for capital from people in meat products as goods, and as an asset for services, directly into UK service sectors via Investment Zones and Freeports, and thus providing other sectors with the transportation of GLAA registered workers, including food manufacturing and food processing that do not have their own sectors at the ONS.

Neoliberalism has made provision for open border policies and it is not clear if this was a long-term strategy, because the EAA1973 s.13(1.a) and s.13(1.b) applied employment status for a limited number of performing arts and dancers in the music industry as workers on a CFS as employees, however present day and the music sector and their workers do not have their own sectors at the ONS. Therefore, Heaths EAA1973 has been expanded into other unobserved employment areas for example into the food manufacturing and food processing sectors because workers in the GLAA remit work from a CFS. This can be verified by checking the registered worker data collected by the GLAA in Table 4.28, and then by passing the registered worker data to the ONS, because the ONS have confirmed they do not have any access to GLAA registered worker CFS data. The EAA1973 changed Lord Bevins terminology of some employees to workers and employers to gangmasters for profitalisation, but this was expanded by Thatcher (BBC, 1992, June 22), then reinforced for liberalised capital collection with some legislation changed without parliament scrutiny for example a veto from signing a Treaty on Stability, Coordination and Governance in the Economic and Monetary Union that would have affected GB Financial Services propped up by GLAA workers, as UK nations were pushed towards a break up.

This is now illustrated following Brexit with the UK flatlining and the UK-EU TCA that entered into force on the 1st of May 2021 that prevents the free movement of people. This

is because legal migration was then increased by a lower salary threshold for migrants, therefore providing for the increase in migration to approximately 800,000 in 2022, followed by increased legal migration to over one million in 2023 (ONS, 2024, November 28).

Open border policies have enabled stakeholders and licensed gangmasters to enjoy the benefits of their actively acquired non-unionised army of labour for capitalisation, all of which are now gathered in an expanding unemployed flexible workforce in the remit of the GLAA. Loopholes in terminology and deregulation with a lack of compliance have enabled, for example, workers to be incorrectly labelled as employees, legislation in Figure 1.1 that has not been adopted by the UK correctly, thus enabling the free movement of registered workers in Table 1.1 for exploitation in the UK.

Supporting the work of Mustchin and Lucio (2020) and MacKenzie and Lucio (2019), unions have been marginalised as a privatised deregulatory agenda employs people in positions of authority supporting drivers of deregulation, for example DLME strategies that consistently fail to assist GLAA workers and legislation drafted to exclude LAPOs (HMICFRS, 2019). The GLAA is now identified as an active actor in the IR system, directing gangmaster services with deliberately coercive directions including worker employment status, as they accentuate forms of non-standard employment for lucrative capital. EU legislation applied in the UK reflects their original meaning, but Figure 1.1 provides a timeline of legislation that fails the precariat leading to the creation of the GLAA as a platform for licensed gangmaster service providers. This has enabled paymaster gangmasters to pass all economic risk to GLAA registered workers assisted by further twisted, changed and copied terminology via stakeholder trade associations, for example the REC and ALP as representation for gangmaster paymasters.

Supporting the work of Barnard and Butlin (2020b), Barnard and Ludlow (2016) and Barnard, Ludlow and Butlin (2018), the Literature Review identified ET systems that are set up in such a way as to exclude the precariat. This is sustained by the GLAA who do not inform GLAA workers of how to make a claim via an ET should they be treated unlawfully but of course, the GLAA could assist GLAA workers by providing information in relation to discrimination before and at work and unlawful pay deductions, but it does not. All GLAA worker employment and legal rights are on the GLAA (2025d) website but references to any legal advice are not provided, which is however the same as UK employees. Therefore, the GLAA acts as a platform for international and national

service providers making employment decisions (Gooberman, Hauptmeier and Heery, 2017) with provisions for licensed gangmasters to move the precariat in and out of the UK (Anderson and Rogaly, 2005; Rogaly, 2008; Barrientos, 2013). This is supplemented by government websites, laws, legislation, and literature that separates GLAA workers on a CFS in Table 1.1, from employees and agency workers, with the term CFS curiously excluded from all government correspondence.

Building on the work of Barnard and Ludlow (2016), this research has addressed the gap between UK laws and their application in practise (Barnard and Butlin, 2020b; Barnard and Ludlow 2016), because Findings in Chapter 4 consistently highlighted avoidance strategies and the injustices and plight of the precariat in UK employment law and in any case, there are few EU-8 migrants and ETs for reasons above. This is supplemented by action taken by BIS who failed to act in the Witkowski Case (ID 1950959/2010) because actions would have highlighted responsibilities of the respondent as a quasi-employment agency under the EAA1973 s.7, which has remained unobserved for five decades. This confirms BIS knew the actions of Witkowski were wrong, thus encouraging the respondent running their gangmaster business as an employment agency and that the respondent as a gangmaster would not be held accountable for their actions as responsibilities as per the EAA1973 s.7. In any case, if BIS had investigated the Witkowski Case (ID 1950959/2010) correctly, other quasi-employment agencies would have been located, other gangmasters and the application of the EAA1973 s.13(1.a), s.13(1.b), s.13(2), s.13(3) would have highlighted licensed gangmasters as businesses and GLAA workers on a CFS as employed.

The examination of historical GLAA data and primary data from workers and participants that include licensed gangmaster associations, the GLAA and ONS in this chapter, therefore show some findings for example the EAA1973 and connections between the HO, DEFRA and the GLAA with neoliberalism that has actively deregulated GLAA worker (employee) terminology, by choosing in favour to provide for, and to ignore the poor actions of quasi-gangmasters.

5.2.2 Discussion of Participant Data

5.2.2.1 History of the GLAA

For over five decades as neoliberalism took grip, the now observed EAA1973 which applied employment status for performing arts and dancers in the music industry for workers on a CFS as employees, has been copied and expanded into other sectors

including the GLAA sectors of food manufacturing and food processing. However, throughout the interviews, gangmaster trade associations did not share this information whereby licensed gangmasters have expanded their services as per the EAA1973 s.5, s.13(1.a), s.13(1.b), s.13(2), s.13(3), arguing instead their loss of confidence in the GLAA operating a credible licensing scheme, whilst at the same time, gangmaster trade associations talk about how the GLAA enables fair competition in a level playing field with a code of practice for the GLAA to audit.

Following the implementation of the AWR, gangmaster trade associations highlighted how gangmasters benefit from some legislation including the AWR (Forde and Slater 2016; Wynn, 2014) because workers never move into permanent full time employment. Other legislation in Figure 1.1 and for example TUPE is not mentioned because it does not apply to GLAA licensed gangmasters [even though it is applied by licensed gangmasters] because they do not employ their workers. Other legislation in Appendix 1.1 has not been applied to the GLAA thus segregating workers (Heyes et al., 2019), providing for a lack of enforcement and legislation in Northern Ireland and Scotland to provide for the free movement of the precariat.

Gangmaster stakeholders including the ALP and REC agreed to be participants in this research, the same participants have also provided direction to the GLA which is now the HO led GLAA, since its inception. Licensed gangmasters have been rebranded as Labour Providers. Participants including two ex-Employees of the GLAA and the ALP quote from the Precision Prospecting Ltd (2005) report about gangmasters and their name in terms of criminality, how changing their name to LPs seemed less threatening (Pich et al., 2014), how miners and people on benefits descended to Lincolnshire for work providing reasons as to why the GLA was formed with licensing standards and a code of practice, which included The Conduct of Employment Agencies and Employment Businesses Regulations 2003 Conduct Regulations. The Precision Prospecting Ltd (2005) report which is secondary data identified in the Literature Review, was a study of people from South Yorkshire and Nottinghamshire visiting Spalding and Boston in Lincolnshire for work (Precision Prospecting Ltd, 2005). However, the report had talked about miners looking for work, and in the same report, recommended seasonal workers as full time employees at 45 hours p.w. The report had sought to help miners and workers in agriculture, by recommending full time employment for both. Instead, it is important to note that some Precision report information has been copied by the ALP into the HO led

GLAA CRG for workers on a CFS/ZHC. The ALP and other trade associations have chosen to ignore the help the Precision report had sought for workers and miners.

The DLME confirmed the GLA had been responsible for the food sector which included the food manufacturing and food processing sectors but the GLA now as the GLAA is not, because the GLAA is only responsible for the gangmaster licensing scheme. Therefore, responsibility for workers in the food manufacturing and food processing sectors is overseen directly by their licensed gangmasters. At interview, participants agreed that a CFS is a ZHC, therefore, the same participants know workers on a CFS are not working full time for their licensed gangmasters, but the same participants did not share how licensed gangmasters earn Private Equity as profitalisation assisted by a CFS, the AWR and GLAA CRG applied in MSPMs.

The researcher provided their realistic MSPM and although not confirmed by participants, it does show how neoliberalism with policy layering created the MSPM in a so-called 'small state', because it provides for capitalist activity in free market liberalisation, by subsidising big business with cheap labour that provide private equity as financialisation (Clark, 2016) for gangmaster stakeholders, whilst at the same time, the new non-unionised shop floor drives down standards thus creating the Cost of Living crisis. There has never been a Customs Union in the UK, non-compliance is standard practice (Ioannou and Dukes, 2021; Mustchin and Lucio, 2020) and MSPMs have not been shared.

HO led GLAA board members, gangmaster trade associations, licensed gangmasters and agricultural landowners linked to GLAA financial investigations, have received positions of authority for example assisting DEFRA with independent reviews into labour shortages in the food supply chain, and recently supporting and providing the Shropshire (2023) review. The significance of Shropshire (2023) shows how short shelf food manufacturing, food processing, pet food and workers in the GLAA remit are excluded from the estimated calculations of TFP of outputs of the food sector, as the Shropshire (2023) report seeks open borders for workers as a hidden 'input' to TFP. This shows how members of the LPC and DEFRA support and provide advice regarding unobserved open borders, including economic horticulture routes identified by the Independent Chief Inspector of Borders and Immigration (parliamentlive.tv, 2023).

Trade associations including the ALP and REC discussed the benefits of the AWR applied in UK law in 2011, whereby the AWR enables gangmasters to prevent workers from entering permanent employment on a CoE but thus enables gangmaster paymasters and

stakeholders to earn substantial profits via the GLAA CRG. GLAA workers are segregated (Heyes et al., 2018) and the government does not share their knowledge of a CFS, for example, the GLAA worker known as Ryszard, has not received offers of permanent employment on a CoE after working unobserved in the food manufacturing and food processing sectors for 16 years. This is a significant point because the respondent most likely met the qualifying period for a CoE many times as they were transported to and from different factories over 16 years.

The following subcategory supplements RO 1 and the Findings located in GLAA historical data and participant data in subcategories 5.2.1 and 5.2.2, whereby the researcher emailed FoI requests to the GLAA asking for assistance to locate some data the researcher could not locate on the GLAA website or at the UKNA.

5.2.3 Discussion of GLAA FoI requests

The researcher emailed FoI requests to the GLAA because some historical data in relation to RO 1 and thus RQ 1 has been archived into a secure area, at best explained as follows:

The researcher checked the UKNA website and located GLA Third, Fourth and Sixth meetings archived to the UKNA under the titles twenty-fifth, twenty-sixth and twenty-seventh board meetings on the 4th of March 2014 (The National Archives, 2014, March 4). GLA data leading up to and including 2009 and all GLA data from 2011 onwards is accessible on the UKNA website. However, GLA data for 2010 for the Third, Fourth and Sixth meetings are located at the UKNA but are not accessible (Figure 5.1 and Figure 5.2), although they are accessible via GLA 2012 data.

GLA Fifth meetings were not archived to the UKNA on the 4th of March 2014 and this is identified on Figure 5.1. However, when the UKNA took a snapshot of GLA data on the 4th of March 2014, GLA data numbered 26/8.7 to 27.71 were archived in a secure area at the same time, which is at odds with other GLA data and GLAA FoI responses, whereby the GLAA indicated Fifth meetings 'may have been deleted in May 2022 in line with the GLAA retention and destruction policy' (GLAA, 2022, August 17). The location of this information is extremely important because the UKNA assisted the researcher in so far as, the GLAA (2022, August 17) in subcategory 3.4.2 had indicated Fifth meetings had been deleted in May 2022 which is incorrect, because the Fifth meetings were archived into a secure area at the UKNA on the 4th of March 2014 (See Figure 5.1 and Figure 5.2)

and are therefore only accessible if the UKNA makes them accessible from their secure area.

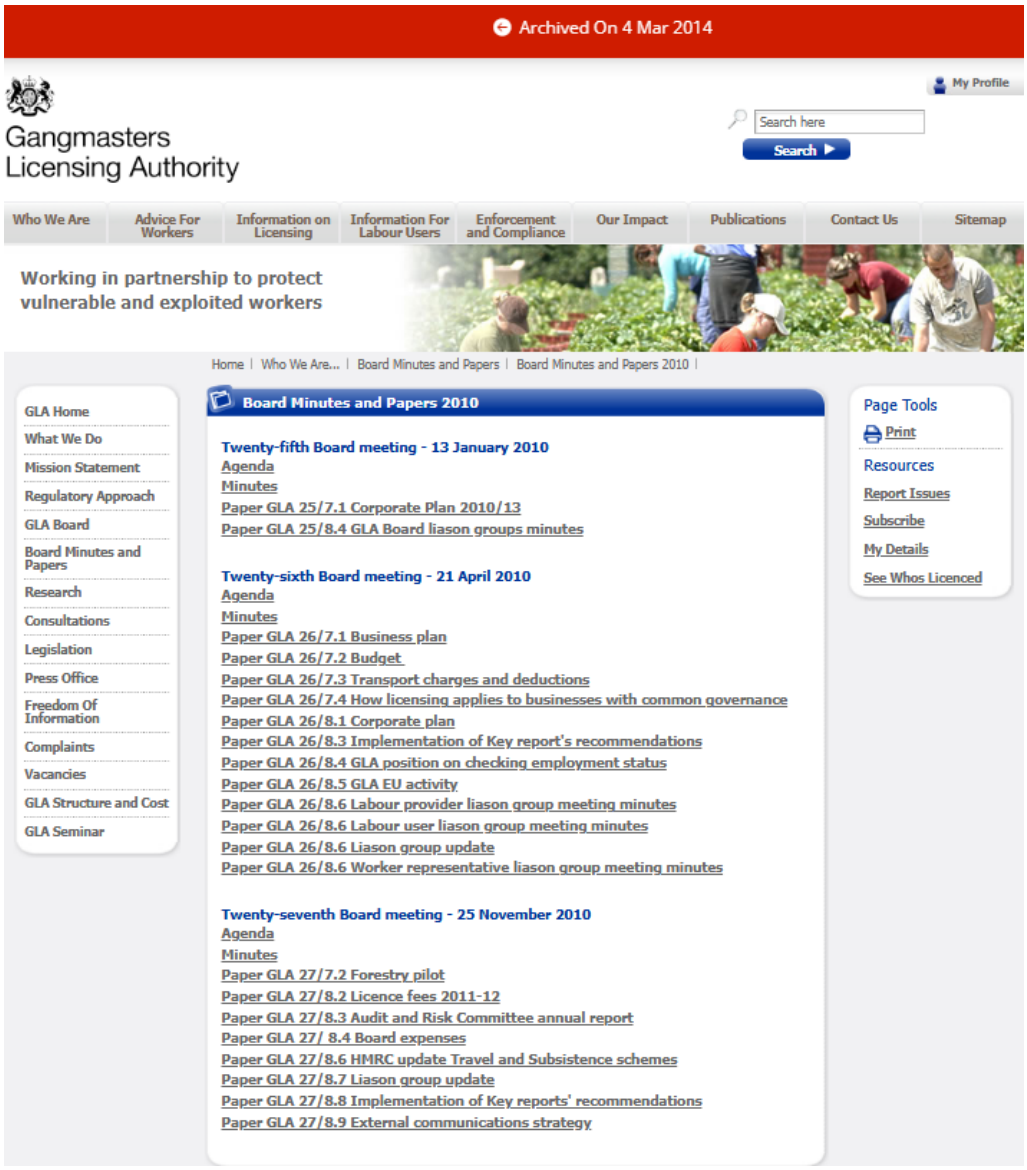

Figure 5.1. GLA Third, Fourth and Sixth meetings from 2010, archived on the 4th March 2014 at the UKNA

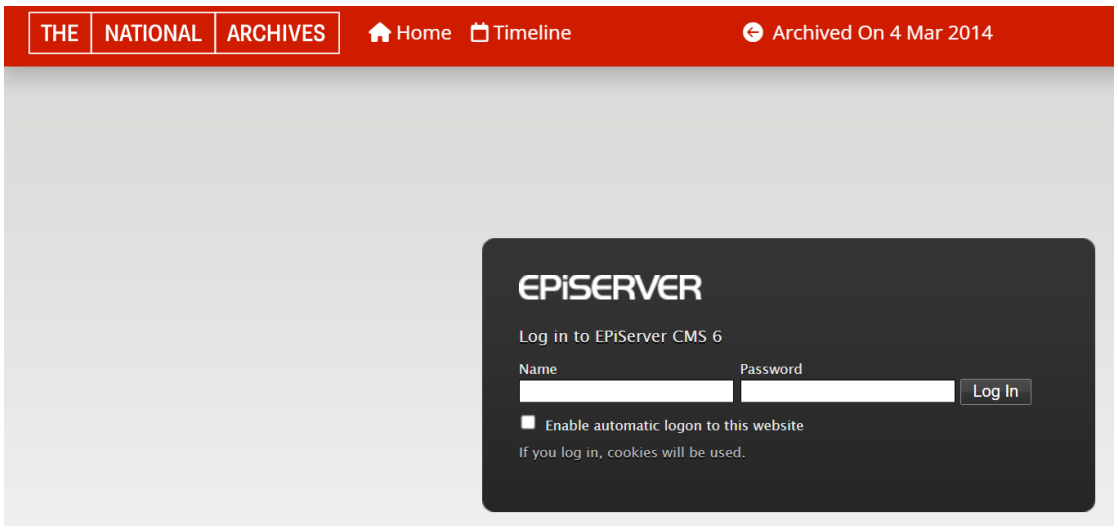

Figure 5.2. GLA Third, Fourth and Sixth meetings from 2010, not accessible on the UKNA website in 2024

This is extremely important because any GLA Fifth meetings held in May and June 2010 have been removed from observation and archived before the data was 20 years old (The National Archives, 2024). This was supplemented by the archived BRES 2015 on the 5th of January 2016, archived Red Tape Challenge documentation, and removed from observation documentation including the GLAA Strategic Assessment 2018-19 dated July the 20th and GLA Third, Fourth, Fifth and Sixth meetings held in 2010. In addition, the researcher was denied access to GLAA board members by GLAA senior management highlighted in subcategory 3.3.5, who at the same time removed historical documentation from 2004 to 2015 of the GLA from the GLAA website, even though the same historical information had already been transferred to the UKNA between 2011 and 2012. However, the researcher had become perceptive to operations surrounding the GLA now GLAA and was familiar with GLAA data. The researcher was therefore able to piece together GLA actions illustrated in Figure 5.1 and Figure 5.2, whereby the GLA or another government department or person(s) placed Fifth meetings as GLA data numbered approximately from 26/8.7 to 27.71 into a secure area at the UKNA on the 4th of March 2014. These actions were then supported by the HO led GLAA via their FoI responses to the researcher in 2024 (GLAA, 2022, August 17).

5.3 Phase 4: RO 2. Critically explore the GLAA governance, evaluating its contribution and role to protect workers in the UK which includes the exploration of GLAA board members, stakeholders and their roles which are regulated by law

5.3.1 Discussion of Worker Respondent Data

5.3.1.1 GLAA Worker Questions 1, 2, 3, 4, 5 and 6

Even though all 17 respondents work in GLAA food related sectors that include food manufacturing and food processing, a total of five respondents responded to job offers from gangmasters to work in the UK, with three respondents paying for travel via plane and bus, which is the same as seasonal workers paying for transport to the UK as per the HO led Seasonal Agriculture Workers Scheme in 2013 that became a Seasonal Workers Pilot, a Seasonal Workers Scheme and the Seasonal Worker Visa Route in 2024 featured in the Literature Review and Table 2.2.

Subcategory 4.1.6.3.11 located GLAA registered workers at the ONS whereby they are not incorporated correctly in ONS data because they are not employed with any guaranteed hours in the services section and in any case, payrolled employees have no guaranteed hours and although some workers may be entitled to Universal Credit, some international and EU workers have NRPF (GOV.UK, 2025, January 14, Standing, 2011 and subcategory 4.1.3.2.5).

This aligns with the researcher's worker responses in Appendices 4.1 to 4.8 whereby respondents in Survey Question 4 confirmed they had many jobs at the same time, Survey Question 13 confirmed respondents had varying hours of work, with Survey Question 8 respondents acknowledging their lack of understanding of their contract types. Businesses and companies also inaccurately included the precariat as employees in the archived Business Register and Employment Survey 2015 s.A(9), s.B(2) and s.C(7) (p. 4) located in The National Archives (2016, January 5) and in addition, manufacturers and the private sector do not engage with Invest Northern Ireland (2025) that collects employee statistics and subsequently provides their statistics to the ONS.

However, the researcher did not question at interview with the GLAA respondent workers (Appendices 3.4 and 3.5) how long they had lived in the UK, or in fact how often they travelled to and from their own country to work in the UK. This is because the researcher did not want to draw attention to the respondents legal status i.e. settled or pre-settled status. However, respondents confirmed their ability to enter and leave factories or their work areas in a variety of ways, with Ryszard not permanently employed on a CoE after

working unobserved in the food manufacturing and food processing sectors for 16 years. There is no UK law that says after 16 years Ryszard or any other worker after 12 weeks on a CFS with the AWR applied should be moved onto a CoE, but it does confirm workers have been expanded on flexible CFSs in MSP Models shared by the REC, enabling their licensed gangmaster to transport them from factory to factory in GLAA licensed sectors, with deductions and/or payments from their weekly pay for profit.

Union numbers are declining in the UK with low skilled GLAA workers in agriculture and factories replacing unionised employees that have been and are undercut in terms of pay and conditions (Ioannou and Dukes, 2021; Mustchin and Lucio, 2020; Precision Prospecting Ltd, 2005; TUC, 2024, June 14). Survey responses support this idea because most respondents were not members of a trade union, and the ALP stated they had never seen a coherent trade union strategy that would assist GLAA registered workers whilst at the same time, the ALP understand the Precision Prospecting Ltd (2005) report because the ALP had given the GLAA a copy of the report. It is the ALP copy of the Precision report the GLAA emailed the researcher. It is this report where miners and others are highlighted as the "dearth of UK nationals" (Precision Prospecting Ltd, 2005, p. 27). As miners and UK employees are replaced, it is the ALP today that describe the replaced employees that are GLAA workers as 'most at risk' and 'vulnerable', whilst at the same time, the ALP raise problems of worker shortages and provide the GLAA with CRG that has copied extracts from the Precision report pasted in their document.

GLAA worker respondents confirmed they had worked in a variety of places including GLAA sectors of food factories, warehouses, fast food chains and unlicensed sectors of care homes, betting agencies and quarries, indicating GLAA registered workers are moved around with or without transport provided by their licensed gangmaster. Unlicensed sectors highlighted by respondents are included in this question, because respondents highlighted additional work sectors alongside their food manufacturing and food processing jobs, which means their licensed gangmaster is moving and/or transporting workers into other sectors, indicating all jobs together are respondents primary jobs. This is because the questionnaire asked the workers: from arriving in the UK, how many jobs had they had i.e. one job, two jobs, three jobs, four jobs, more than four jobs, with an area for where they worked for example food factory, warehouse, agriculture with a space for the respondent to answer in more detail. These open questions allowed respondents to provide their own understandings of where they worked. This also aligns with information about gangmasters provided by respondents Dariusz, Filip,

Józef, Michal and Ryszard and the idea workers on a CFS moved between different GLAA licensed sectors and those not licensed. Appendix 4.2 provides additional information of the researcher's understanding of Piotr and Filip.

5.3.1.2 GLAA Worker Question 7

The respondents identified 16 recruitment agencies/gangmasters (See Table 4.9 and Appendix 4.3) that operated in the GLAA licensed gangmaster sectors. The researcher then located respondent gangmasters in the GLAA Public Register, their different trading names, their Companies House SIC Code, evidence of merging with other gangmasters and partnerships with government departments.

Following online Google searches of respondent gangmasters by the researcher, four gangmasters identified by the respondents were not registered on the GLAA Public Register. Therefore, the four gangmasters identified by the respondents that were not registered on the GLAA Public Register located in this research operate illegally in the licensed gangmaster sectors in Yorkshire and the Humber, thus indicating unknown numbers of gangmasters operate in the GLAA food manufacturing and food processing sectors.

In 2023 Staffline applied SIC Code 78200 - Temporary employment agency activities and in 2024 they also applied SIC Code 78109 - Other activities of employment placement agencies, SIC Code 78200 - Temporary employment agency activities and as part of a PLC, Staffline registered as SIC Code 82990 - Other business support service activities not elsewhere classified. Changing SIC Codes at Companies House does not change the work of the GLAA, however it does indicate that Staffline may be collecting sufficient Private Equity to require a SIC Code change. This is because the number of workers Staffline supplies may be in excess of the number of workers the GLAA collects from them, that the GLAA subsequently total and then provide in Table 4.28. For example, in 2024 the GLAA confirmed 715,000 workers were supplied by 1,100 gangmasters in the licensed sector, which averages 650 registered workers per licensed gangmaster (GLAA, 2024b).

Staffline and Blue Arrow are both licensed and unlicensed gangmasters because they operate in both licensed and unlicensed gangmaster sectors for example, Staffline has a training agency with workers that provides workers into different sectors for example food processing and packaging. Staffline should [but does not] allocate additional SIC

Codes from the already condensed SIC Code list (Companies House, 2021) including for example SIC Code 85590 - Other education n.e.c. and SIC Code 85600 - Educational support services, and in any case, this agency should provide links at Companies House to any Educational Support Services.

This is supported by the provision for mergers and acquisitions by licensed gangmasters to expand by simply sharing their GLAA license with other gangmasters by making changes to a licence (GLAA, 2025g) by for example, merging with gangmasters who lose their license, merging with those that have failed an inspection, and/or merging with gangmasters in other sectors that do not have a license and have not had a compliance inspection. Subcategories 4.1.2.2.7.4 evidenced gangmasters merging with other gangmasters as per GLA Brief 6 (GLA, 2010, June), and Table 4.9 has identified recruitment agency/gangmaster mergers and/or acquisitions.

As per Table 4.9, Staffline is removed as a temporary agency company from ONS data [like Blue Arrow], because ONS Section P as SIC 82990 excludes temporary agency work from ONS data and provides part data as Education in ONS non-Financial Services data for example Figure 4.7 (ONS, 2018, November 8a). Therefore, Companies House via the ONS also provides provision for the licensed gangmaster sectors to provide a lack of GLAA worker data and any training and/or apprenticeships applied to GLAA workers.

Also in Table 4.9, some gangmasters for example Blue Arrow traded by a similar name to its parent name, but Companies House provides links to other gangmasters and financial institutions via Crown Dependencies and British Overseas Territories as tax havens listed as SIC 64209 - Activities of other holding companies not elsewhere classified (GOV.UK, 2025).

The researcher concludes this section by informing the reader that Table 4.9 also indicates there is a possibility that Blue Arrow with Cordant and PMP are excluded from global data, because RSS Global (2024) is listed as SIC 64209 and then as part of Twenty 20 Capital (2024) SIC 70229.

5.3.1.3 GLAA Worker Questions 8, 9, 10 and 11

Although a small sample, these respondent statistics are important because they magnify incorrect employment status provided by licensed gangmaster CFS contracts from GLAA literature (GLA, 2012, January; GLAA, 2021, May) to that of Snook (PQ magazine, 2021,

June), because 16 respondents are presented as employees as per the EAA1973 (s. 13(1.a)) by their recruitment agency/licensed gangmaster businesses as per EAA1973 (s. 13(1.b), s. 13(2), s. 13(3)). This is also directly related to legislation in Figure 1.1 and their application in the UK in the researcher's realistic Figures 2.3 and 4.2, and the review of published literature in Chapter 2 subcategory 2.2, following the creation of the EAA1973 just prior to the UK joining the EU on the 1st January 1973 [alongside Denmark and Ireland], with the EAA1973 enacted on the 18th July 1973.

With just one worker respondent Piotr identified on a ZHC, 16 respondents worker employment status is therefore presented as GLAA workers [GLAAC3] in the concept of the precariat in Table 4.15. Workers are incorrectly defined as employees under a CFS in the Literature Review with abuses of social benefits (Fitzgerald and Smoczynski, 2021) and identified by Full Fact (2016, May 12), noncompliance of the AWR (Thompson, Newsome and Commander, 2012), and confidential apprenticeship agreements with gangmasters mean there is no requirement for a licensed gangmaster to share information with regard to workers providing services or apprenticeships in apprenticeship frameworks as per the EAA1973 s.13 and the Apprenticeships, Skills, Children and Learning Act 2009 s.1, s.13, s.32, s.35, s.37, s.63 and s.122, and/or the GLAA as a platform for gangmasters to apply their CRG provided by the ALP (Appendix 2.1).

Therefore, from the enactment of the EAA1973, workers in Table 1.1 have been expanded on a CFS to create an unobserved non-unionised shop floor, lobbied for by gangmaster businesses and gangmaster trade associations for profit, that requires unobserved open borders for unobserved GLAA workers in and out of the UK. Lucio and MacKenzie (2017) detailed government contradictory compliance approaches which reinforce the argument of political discourse and capital activity for gangmaster businesses to expand the precariat as a flexible workforce in free market neoliberalism in MSPMs, with no clear employment status for over five decades for economic income as profit for Private Equity for all GLAA sectors.

5.3.1.4 GLAA Worker Question 12

Even though surveys were carried out discreetly, respondents fear losing their job and respondents may have chosen not to respond in detail to Survey Question 12 for this reason. The Literature Review features problems in the workplace but in response to Survey Question 12, Dariusz, Jakub, Tekla and Zofia amplify their work problems, which includes AMT monitoring of their performance that results in disciplinaries, the

cancellation of work shifts or the shortening of work hours with fewer rest breaks than client employees, advised not to speak Polish in the work area with a lack of English training, pension contributions not sent to their pension fund and how English laws do not require holidays written on payslips, five hours' notice at night to attend work during the night with workers required to purchase their own work clothes for chilled work environments.

As discussed in Chapter 2, gangmasters and their FMCs can reduce, expand, remove or stop worker hours, with the ability to stop and start worker shifts as they choose. They have the ability to carry out legal deductions to workers pay including for safety shoes, to not pay holiday pay, to not pay gangmaster pension contributions, to claim SSP but only for full time workers, to apply disciplinaries to workers as per AMT measurements, to not provide work uniforms to workers alongside employees, with the provision for gangmasters to apply legal deductions as a cost to workers, then as a profit to licensed gangmasters via the HO led GLAA CRG in MSPMs. Even though the small sample of respondents totalled 17, nearly 25% of those respondents confirmed this information. This is important because licensed gangmasters have the responsibility to manage the AWR and any related legislation applied to the licensed gangmaster sectors including licensed gangmaster use of TUPE when SLAs are transferred or taken over by other licensed gangmasters, even though TUPE has not been recognised in UK law for tax and NIC purposes. These licensed gangmaster actions and respondent data supplement the use of MSPMs like the researcher's realistic MSPM.

5.3.1.5 GLAA Worker Questions 13 and 14

To explain how respondents are not employed on a CoE, the researcher analyses respondent data from Questions 13 and 14.

Fifteen respondents confirmed 23 different weekly hours at work with nine workers that confirmed working from a CoE in Survey Question 8. However, the nine workers include for example, Michal and Zofia who had deductions for transport and accommodation, Magdalena received their payslip via their application with varied equivalence of full time hours, Karolina and Róża had varied weekly hours, Szymon was controlled by Tom and did not receive holiday pay, Stefan signed arrival and departure papers in and out of their food factory, and Anna and Halina worked for two gangmasters: Angel and Staffline.

Therefore as per the MSPM, no respondents were employed on a CoE, which confirms workers CFS was in operation as per the EAA1973, with workers lacking formal breaks the same as client employees, even though the AWR provides parity for agency workers. This supports the idea that political discourse has separated workers on a CFS from those as agency workers, when both workers are the same.

5.3.1.6 GLAA Worker Questions 15, 17, 18, 19 and 20

Sixteen respondents had not heard of the GLAA with just Dariusz recognising the GLAA having seen a sign in Birmingham. The majority were not members of a trade union which is highlighted in Chapter 2 subcategory 2.3.4.2. Survey questions conclude with respondent data, that indicates gangmasters and their FMCs and other GLAA sectors do not provide GLAA workers with knowledge of the GLAA, and therefore GLAA workers were not members of any trade union.

5.3.1.7 Summary of Worker Respondent Primary Data

The respondent sample size of 17 migrant workers matched the type of GLAA workers [GLAAC3] in this research and although a small sample, the sample size is justified on the basis that all survey questions were responded to as per Appendices 4.1 to 4.8, and that sufficient primary data was collected that helped respond to the Research Objectives in subcategory 1.2.1 and thus answered the Research Questions in subchapter 1.2.2. Showing the highest standards of rigour, data collection via snowball sampling had led the researcher to the Catholic Church, whereby worker respondents in this research were met in different locations, workers had felt safe and supported in the surroundings of the Catholic Church, and workers had comfortably filled in surveys either directly or with help from interpreters.

This research complements the compliance and regulation work of Mustchin and Lucio (2020) and Mackenzie and Lucio (2019), the deregulated HCW of Clark et al. (2022), weaknesses in supply chains and the lack of enforcement of underpayments of wages of Lucio and MacKenzie (2017), and research based on the enforcement of employment rights by EU-8 migrants and ETs by Barnard and Butlin (2020b), Barnard and Ludlow (2016) and Barnard et al. (2018) who write from a legal perspective about laws to protect the precariat (Standing, 2011). This is the first in-depth analysis of GLAA workers in the concept of the precariat (Standing, 2011), which identifies disparities between 17 migrant workers: respondent data of what is understood and what is not understood, what is

applied to them and what is not applied to them, what help they receive and what help they do not receive, but most importantly, what is known and what needs to be known.

As this subcategory draws to a close, it is important to note the researcher now identifies GLAA peripheral workers [GLAAC3] as a new Fifth Group of the Precariat (Standing, 2011), to be known as the 'Licensed Workariat'. This new group is highlighted in Table 1.1. Additional Fourth and Sixth Groups are also placed in Table 1.1. The word 'Workariat' combined worker with precariat. This new terminology will be applied where possible in the right context in the remaining text of this research.

The 17 respondents primary response data links them into the concept of the licensed workariat and working via the researcher's concept of a MSPM (Figure 4.2) that is linked directly to the CLCS identified in the Literature Review. A MSPM was also located in stakeholder participant response data and is discussed in the following category.

5.3.2 Discussion of Stakeholder Data

5.3.2.1 Technical Issues of the GLAA

The REC and ALP talked about gangmaster Core and Periphery Models with the ALP highlighting the CFS Model as their dominant model (4.1.3.2.3) and the REC describing the licensed workariat as their commodity. Findings show that GLAA stakeholders have separated agency workers from those on a CFS (REC, 2024, November 26), which is the same as the government, because there is no information allocated from government as to the use of a CFS, including via the CEST tool for the licensed workariat. This indicates gangmasters provide their international workforce without sufficient guaranteed hours, supplemented by UK citizens also without sufficient guaranteed work hours. Gangmaster commodities supplied to any GLAA sector or FMC are managed by their client. It is the gangmaster client that chooses how many hours the licensed workariat will work before they are sent back to their licensed gangmaster. A CFS as a ZHC enables this, but it is critical realism with the knowledge and experience of the researcher that highlights the use of the CFS and SLA between the FMC and the licensed gangmaster with HO led GLAA CRG applied in realistic MSPMs that shows the different entities amalgamating together for profitalisation.

The GLAA did not grant access to GLAA board members and instead responded to some researcher Emails and FoI requests, but some emailed questions were responded to for example, the CFS was an 'initiative from the REC' (GLAA, 2022, September 30) in

subcategory 4.1.5, but in fact the CFS is a dominant document as a contract between the gangmaster and the licensed workariat. The CFS however is not a specific model on its own, because the CFS as a contract becomes a model with legislation applied as per a MSP Model described by the ALP and REC in Table 4.26. In addition, the ALP talked about how the CFS provides the licensed workariat with non-discriminatory rights including holiday pay under the WTR, but at the same time, the ALP fail to mention gangmaster abilities to withhold holiday pay should 'an occurrence due to unusual and unforeseeable circumstances' occur beyond the control of the licensed gangmaster WTR1998 s.21(e.i).

Supporting data from the REC and ALP identified the CFS Model (Figure 2.3) as their dominant procurement process for the licensed workariat as a commodity in the gangmaster specific model illustrated by the researcher to assist the reader as Figure 4.2. This is significant because legal deductions and payments as per GLAA CRG (See Appendix 2.1), is confirmed as per data collected via Appendix 4.2. This is not checked with HMRC, before being applied as per Appendices 2.2 and 4.11. This is extremely important [because it may be that] licensed gangmasters manage their MSP Models differently for example one licensed gangmaster may prefer students because their travel visas allow for example up to 18 hours work p.w., therefore the gangmaster profiteers from the collection of all income from their commodity (Appendices 2.2 and 4.11), and directly from the FMC as per ALP generated GLAA CRG and government NIC thresholds. It may be that other licensed gangmasters show a preference for migrant workers in the concept of the licensed workariat for profitalisation, due to their poor English skills and thus lack of understanding of so-called employment contracts, but both licensed gangmasters via the application of EU legislation in UK law.

The GLAA/MSPM illustrated as the researcher's realistic Figure 4.2 is significant because it provides for gangmaster representation on a FMC site whereby their employees recruit the licensed workariat (Table 1.1) on a CFS which is a ZHC and are therefore not employed, they do not have a voice and do not receive employee benefits (Figure 2.3), as pointed out by Snook in PQ Magazine (2021, June; Snook, 2017).

As per subcategory 4.1.3.2.4, the researcher had questioned participants about a CFS as a ZHC. In response the DLME had referred the researcher to the ALP, and the ALP, REC and GROUP all agreed. This was supplemented by the ALP talking about how the CFS provides flexibility and some employment rights under the WTD. Five participants,

except the DLME, agree the CFS is a ZHC and a model, and as UK legislation is applied, the CFS as a model within the MSPM illustrated in the researcher's model as Figure 4.2, enabling the licensed workariat to be moved from factory to factory. GLAA CRG is applied via the licensed gangmaster SLA directly onto gangmaster payrolls in the GDMR. This regime also receives licensed workariat numbers daily from the FMC via the 'Labour Demand Communication.' 'Digital Scheduling' is then carried out and members of the regime contact the licensed workariat via their mobile phone APPS to attend work, or the licensed workariat are contacted directly via AMT devises applied to or worn by the GLAA licensed workariat. Weekly Key Performance Indicators (KPIs) are then provided by the GDMR to the FMC.

REC membership includes all gangmasters, whereby ALP membership includes licensed gangmaster businesses for licensed sectors including agriculture, horticulture, SAWS and for this research: food manufacturing and food processing. This is important because the REC confirmed they advised all their members or "people" to access GLAA CRG for their SLAs.

The researcher questioned the DLME, REC, ALP, and GROUP about GLAA CRG. As the GLA was implemented, the GROUP confirmed HMRC had been involved in GLAA CRG discussions. However, at some point, HMRC have not been involved in new discussions because the DLME could not provide an answer but nonetheless, showed their trust in gangmaster trade associations who they describe as the good guys who attended meetings and diverted the researcher again to their ALP expert. The REC did not know if GLAA CRG had been checked by HMRC, nonetheless, the REC confirmed they would check if GLAA CRG had been checked with HMRC. The researcher has not contacted the REC to see if this had been done, and the researcher has not contacted HMRC to check if GLAA CRG is correct because it is not clear if the government informed HMRC of correct information with regard to the GLAA licensed workariat and the CFS because the OTS (Jack and Whiting, 2014, July 11a; Jack and Whiting, 2014, July 11b; Office of Tax Simplification, 2015, March) examined a CFS and described it as a commercial contract for the services of a self-employed individual to be integrated on a payroll with full PAYE and NIC, enabling licensed gangmasters to purchase workers in modern day slavery. Nonethless, the ALP confirmed CRG was not checked with HMRC, further confirming *NMW and NI rates are already set so there is nothing for them to check* (ALP, personal communication, September 12, 2022) including there were *no instructions*

to the ALP to follow the advice given in the Precision Prospecting report (ALP, personal communication, September 14, 2022).

The GLAA role is registration of licenses and approval of licenses and governance, but the GLAA does not provide a template gangmaster model, nonetheless the GLAA check gangmaster models and compliance against legislation, licensing standards and briefs.

The REC accepts the Declaration of Philadelphia which was adopted by the ILO in 1944 but at the same time, the REC do not recognise it for GLAA registered workers in the concept of the licensed workariat. As the REC talks to the researcher, they use language such as: 'both us at the trade unions,' implying themselves talking for, or working with trade unions as they link employment contracts with ZHCs, maintaining the separation of agency workers from those on a CFS. In any case, the REC should not use this language because the TUC (2017) argues the importance of ensuring all workers, including workers on ZHCs have access to basic rights and protections.

The REC describe two SLAs. One SLA is a Pay Procurement Model with gangmaster employees recruiting the precariat on a manufacturing site, which provides KPIs of total worker numbers and has costs renegotiated when the SLA is up for renewal. The second SLA is their MSPM with gangmaster employees recruiting the precariat on a manufacturing site which also provides KPIs of total precariat numbers and has costs renegotiated when the SLA is up for renewal. However, the REC argue gangmasters are seeking a pure Pay Procurement Model that is flexible and more sustainable and productive, for example, keeping workers in a factory for 15 weeks instead of 10 weeks. This would be a distraction from the AWR of 12 weeks; however, the researcher understands gangmaster SLAs and can recognise both REC SLA Models as the same, thus enabling gangmaster workers as gangmaster commodities, with SLA clients able to stop and start workers on their CFS on any shift or working day they choose.

This is the same as the ALP who also avoid full explanations. The REC and ALP describe their CFS Model, which they describe as flexible and protects workers with the right to the NMW, WTR which is the WTD and AWR. The CFS is persistently described by the REC and ALP as their template model, described by the ALP as flexible due to it having zero hours which the government is protective of (Table 4.26). This is because it is the CFS Model which is also a ZHC between the licensed gangmaster and the licensed workariat, which provides continuous profitalisation for its stakeholders before, during

and following economic dangers, but also as a continuous flow and extension of gangmaster paymaster expansion.

As per the GDMR, gangmaster onsite employees, thus apply CFS worker hours and legal deductions and/or payments to gangmaster weekly payrolls, with legal deductions or payments from any weekly income shown on a weekly payslip as per the CFS/ZHC. The CFS does not have any cutoff, whereby there is no confirmed amount of income or hours the licensed workariat should not be deducted from or make payments from. This is explained in Appendix 4.11.

The licensed workariat are thus paid by their licensed gangmaster prior to total payrolled invoices arriving at HMRC. HMRC fail to ensure correct payments are made to the licensed workariat because they too are not informed of the expansion of the EAA1973 and how legislation is applied for example, the CRG provided by the ALP to the GLAA has not been checked with HMRC and in any case, the CFS and MSP Models have not been shared with HMRC and the OBR. It is not clear if information in relation to CFS Models and MSPMs were shared with the OBR because the OBR influences the Financial Services Sector but at the same time, it completely fails to consider the high numbers of people in Table 1.1 as concealed as HID from HMRC. In addition, ONS data is not correct for example, EMP17: with people in employment on zero hours contracts (ONS, 2025, May 13) people aged 16 - 64 in employment (ONS, 2022, November 15) and Employment in the UK (ONS, 2025, July 17). Supplemented by neoliberalism, this information has not been shared with UK citizens or the OBR that came into operation in 2011, and it is not clear if the government informed HMRC of correct information because the OTS (Jack and Whiting, 2014, July 11a; Jack and Whiting, 2014, July 11b; Office of Tax Simplification, 2015, March) examined a CFS and described it as a commercial contract for the services of a self-employed individual to be integrated on a payroll with full PAYE and NIC, enabling licensed gangmasters to purchase the licensed workariat in modern day slavery. Therefore, HMRC do not audit GLAA registered workers so called employment with deductions and payments as per the ERA1996 (s. 13, s. 14, s. 15, s. 16) by licensed gangmaster businesses. Therefore, the OBR does not scrutinise correctly the UK public finances thereby providing gangmaster paymasters with the ability to continue their collection of profitalisation for Private Equity.

Discussions permitting legal deductions from precariat wages had failed prior to 2010 and this was highlighted as per GLA meetings held in 2009 in subcategory 2.1.1.3. However, at some point following 2010, discussions have continued because legal deductions and

payments have been agreed. Stakeholders for example the ALP market transportation and legal deductions are permitted, which are deducted from the licensed workariats weekly pay before they receive their weekly wage. There is no numerical cutoff. The licensed workariat opt in and out for legal deductions and payments and the GLAA checked this during compliance inspections. However, this is not possible unless compliance inspections include talking to every registered worker on every shift in all manufacturing sites at the same time. In any case, respondents in the sample of 17 needed help to fill in the questionnaires, indicating their struggle with English literacy, supplemented by the RLAB in Table 4.26 who confirmed the GLAA lack powers to enter a retail factory without a warrant, even if suspicious activity is in operation.

This is supported by four respondents who confirmed they had deductions from their weekly payslips for accommodation, transportation, a DBS, and safety shoes with Dariusz also confirming they did not have any NIC deductions on their payslip. This is understandable because their gangmaster has claimed NIC for Dariusz from their FMC and then profited from this payment, because Dariusz has received short hours under the NIC threshold from the FMC, and as per the flexible CFS as a ZHC.

Regarding GLAA workers [GLAAC3] holiday pay, the REC chose to use an example from the Education sector illustrated earlier in subcategory 4.1.3.2.3. In this example, the REC implied there was an incentive to move towards a CFS for better holiday pay instead of a CoE due to outcomes applied in the Harpur Trust (Appellants) v Brazel (Respondent) Case ID UKSC/2019/0209. In this case, the ERA1996 had established status of employment and holiday pay, even though s.13(1.a) and s.13(1.b) from the unobserved EAA1973 had been copied into it. Judgements did not mention the EAA1973 or the AWR, however, judgements were applied which incorporated the accrual of holiday pay for 45 hours worked at 12.07% which applies to workers on a CFS or ZHC with the AWR applied as per the EAA1973 (s. 5, s. 13(1.a), s. 13(1.b), s. 13(2), s. 13(3)) and specifically as per the WTR1998 (s. 16(A.2)) and Appendix 2.1. This case provided by the REC was disingenuous, because employees and workers on a CFS in Education [also Communications and Promotion] were excluded from the GLA Brief 42 When to issue a P45 to workers (Regulatory Policy Committee, 2015) illustrated as Appendix 5.1, but removed from observation the same year and prior to the GLA change to the GLAA, because people working in Education from a CFS/ZHC therefore receive holiday pay equivalent to employees in Education. Therefore, the REC example is relative in the context of the use of a CFS and holiday pay, but it is also clear workers in Education

whatever their employment status and contracts have been, are afforded privileges different to the licensed workariat in the GLAA remit and have thus been entitled to the equivalency of satisfactory holiday pay the same as employees in Education on a CoE.

5.3.2.2 Summary of Stakeholder Participant Primary Data

The participant sample size of five stakeholders is justified on the basis that semi-structured interviews and a focus group provided sufficient primary data to respond to the Research Objectives in subcategory 1.2.1 and thus answer the Research Questions in subcategory 1.2.2. Once again snowball sampling led the researcher to stakeholders that had vested and economic interests in the GLAA. Showing the highest standards of rigour, stakeholder participant primary data was accurately recorded, with copies of transcripts emailed to the stakeholders before primary data was critically analysed.

This is the first in-depth analysis of stakeholder participant response data in relation to the GLAA and the licensed workariat in their remit. Just like the 17 GLAA worker respondents in subcategory 5.3.1.7, stakeholder participant response data in subcategory 5.3.2.2 identifies disparities between what is understood and what is not understood, what legislation is applied to licensed gangmasters and what legislation is not applied to them in the context of what and how participants chose to share information to the researcher at interview, what help and support participants received in free market liberalism to provide profitalisation as Private Equity via the HO led GLAA and MSPMs, what and how information is being shared and not shared, but again and most importantly, what is known and what needs to be known, so it can be shared, corrected and learned from.

Primary data supports the Literature Review by confirming there is little GLAA or state enforcement of gangmasters, their licenses with deregulated legislation in relation to the licensed workariat, with licensed gangmasters having the responsibility to manage laws and legislation in relation to their commodities (Table 4.26). This is because the GLAA only licenses gangmasters and has no powers to guide gangmasters, deductions and payments from the licensed workariat are acceptable because copies of GLAA CRG is not provided to HMT or HMRC's Enforcement Team (Table 4.26), who are therefore not aware of fraud and criminality in the licensed gangmaster sectors and are therefore not able to collate intelligence in relation to GLAA CRG. HMRC and the OBR are not provided with information with regard to legislation and how MSPMs are applied, or HMRC have members linked to neoliberalism due to letters exchanged via the OTS in subcategory 2.3.2, enabling the protection of their gangmaster flexible workforce.

Neoliberalism is the dominant discourse that provides for the increase in capital flows as the disconnection of HMRC and the LPC from the HO led GLAA is highlighted.

Some stakeholder's primary response data was unclear but then became clear to the researcher because critical realism and an archival search of the GLAA history, statutory and functional role to regulate labour in its remit had provided substantive evidence of how licensed gangmasters operate in the UK. The researcher has critically explored GLAA governance, by evaluating its contribution and role to protect the precariat in the UK which includes the exploration of GLAA board members, stakeholders and their roles which are regulated by law. Therefore, as participant research data was collated together in Chapter 4 and then analysed, stakeholder participant primary data proved to be very helpful because it helped the researcher link participant primary data to legislation in the researcher's realistic MSPM, which thus helped the researcher to link to licensed gangmaster paymasters, to then link to the CLCS.

Figure 4.2 is displayed in subcategory 4.1.3.2.2 and is the researcher's realistic concept of historical legislation applied in the UK from Figure 1.1, the Literature Review and Appendices 1.1, 2.1, 2.2 and 4.11. Segments of Figure 4.2 have been confirmed by participants in their coded data in subcategory 4.1.3.2.4 and subcategories 4.1.3.2.1 and Appendix 4.9. To reinforce this data, additional segments of Figure 4.2 have been verified by respondent data in Appendices 4.1 to 4.8 whereby respondents confirmed a variety of Deductions and Payments were made by them from their weekly pay. Figure 4.2 is the researcher's model that is not verified and is not applied as a model in the UK but was provided with critical realism in this research to assist the reader, nonetheless, there is a MSP Model applied in the UK, that has not been shared and this was identified in Table 4.26 by the REC.

This data thus supports the researcher's abilities in the following subcategory to analyse how accurately the precariat at the ONS, are recorded in national statistics.

5.4 Phase 4: RO 3. An examination of data and collection techniques at the ONS that will establish if the precariat (Standing, 2011) on a CFS are provided with a full range of coverage in their data which is essential for government, treasury, finance, economic and social policy making

5.4.1 Discussion of Participant Data: Employee Status

Prior to a change of government in 2010, the REC and ALP had lobbied the Labour Government for changes to employee and employment practises including changes to transport charges and deductions, employment status and following an EHRC presentation on the exploitation of workers in the meat and poultry processing sectors, the REC and ALP had sought to recruit workers from other countries, but had failed (GLA, 2010, April 21c). However, discussions that followed and held on the 16th of June 2010 have been located in a secure area at the UKNA (See Figure 5.1 and Figure 5.2). This data was archived on the 4th of March 2014 and is only accessible if the UKNA makes the data accessible from their secure area, therefore it is not clear if the EHRC were involved in any discussions.

The ALP agree GLAA registered workers [GLAAC3] are not employees and are therefore not employed with full employment benefits because the researcher was referred to the ERA1996 s.230(1.b) to establish status of employment. However, the ERA1996 does not establish any status of employment because it has had earlier legislation copied into it, this is from the unobserved EAA1973 s.13(1.a) and s.13(1.b) which applied employment status for performing arts and dancers in the music industry as workers on a CFS as employees. It is this legislation that has been copied and expanded into other sectors because music sector employees or workers also do not have their own sector at the ONS. Therefore, workers in the music industry on a CFS/ZHC alongside GLAA registered workers on a CFS/ZHC in the food manufacturing and food processing sectors, are both sectors with workers that cannot be easily identified in ONS statistics. It is Heaths EAA1973 legislation that has legalised gangmasters, that has been taken advantage of in free market liberalism whereby it has been copied and expanded into other sectors. These sectors are now identified as licensed GLAA sectors and unlicensed sectors without their own sectors at the ONS, as political discourse created loopholes in laws and legislation for their gangmaster paymasters for economic capitalisation.

The GLAA has counted GLAA registered workers illustrated in Table 4.28, however subcategory 4.1.3.2.3 indicates how no one has attempted to locate GLAA registered workers in ONS statistics, and all participants in subcategory 4.1.3.2.3 show little interest

in doing so. Companies House does not check SIC and SOC Codes because if they did, gangmasters would have applied more of the limited industrial classifications (Companies House, 2021) and in any case, in Table 4.27, gangmaster trade associations do not encourage correct SIC and SOC Codes for example those that should be applied to transport (Fitzgerald, 2007; Tuckman, 2010). In addition, the ONS so-called standard class system for people and employed people cannot be used to locate agency people. In Table 4.27, the ALP indicated they had tried to locate GLAA registered workers in the food manufacturing and food processing sector, but they were unable to do so. This is confusing, because there are no separate food manufacturing and food processing sectors at the ONS. To add further confusion, the REC assured the researcher they collected all worker numbers that worked in the UK including GLAA sectors of food manufacturing and food processing because worker numbers in the REC annual survey (REC, 2024, November 26) provided a more accurate count than those collected by the ONS. Following the interview and a short time later, the REC produced their annual Recruitment Industry Status Report (RISR) (REC, 2024, November 26).

The REC (2024, November 26) RISR is based on REC estimated agency numbers the REC increased by 8.4% from 976,400 workers in 2022 to 1,058,300 temporary, contract or agency workers in 2023, which is lower than the REC interview quote of ONS estimates. In the report, the REC acts as a representative voice for agency workers and states gangmasters contributed £44.4 billion GVA via an estimated 31,247 enterprises. Nonetheless, this means REC RISR figures indicate 31,247 gangmasters provide an average of just 33 workers each day into work. In addition, it is not clear if the REC (2024, November 26) RISR report provides a sectoral breakdown that includes food manufacturing, food processing and textiles sectors as advised at interview, because the full report is not accessible by REC non-members on their website. The report suggests AI is predominantly used to advertise jobs but does not mention the use of AMT devises applied to or worn by GLAA registered workers. The RISR report therefore does not collect numbers of workers from their members but provides estimated total numbers of workers including GLAA registered workers, which is at odds with REC comments at interview. Removing 715,000 GLAA registered workers whereby 1,100 licensed gangmasters average 650 workers p.d. into the regulated sectors (GLAA, 2024b) identified in Table 4.28, from REC figures in their RISR report (REC, 2024, November 26), indicates 30,147 gangmasters provide less than 10 workers each day into other sectors.

GLAA registered workers can join a trade union and this was supported by the GROUP who had talked about the success of involving GLAA registered workers in working groups that joined management meetings. However, in relation to trade unions, the ALP pointed out they had never seen a strategy by a trade union that would engage with the most 'vulnerable' and precarious workers in the UK, because the ALP indicate gangmaster trade associations and licensed gangmasters provide better training, organising and representation of peripheral workers in Table 1.1 which includes organising better pay such as a Real Living Wage (Dobbins and Prowse, 2021; Living Wage Foundation, 2024) and/or conditions for the most 'vulnerable' precarious GLAA workers [GLAAC3]. However, the ALP did not confirm if they had adopted worker consultative practices with for example the Living Wage Foundation (2024) even though the RLW is calculated on the real cost of living (Living Wage Foundation, 2024). Nonetheless GLAA registered workers' pay and gangmaster charges are calculated by the ALP in their provision of the GLAA CRG whereby hourly NMW/NLW rates are recommended (Appendix 2.1).

The researcher's Appendices 2.2 and 4.11 lay out for the reader how profitalisation is acquired by gangmaster paymasters directly from GLAA registered workers via the CFS Model in any MSP Models as per Figures 2.3 and 4.2 and participant findings in Phase 3 subcategories 4.1.3 to 4.1.6. Neoliberalism via the HO led GLAA with gangmaster stakeholders drive down standards. The level playing field has been lowered as a new shop floor with a flexible european and international workforce in the concept of the precariat has been created. This new shop floor now includes UK citizens whereby the application of CFSs and MSPMs have not been shared. The GLAA workforce has little or no representation, with many licensed workariat having no NRPF for example Universal Credit to help support or prop up their CFS (GOV.UK, 2025, January 14, Standing, 2011 and subcategory 4.1.3.2.5).

5.4.2 Discussion of Email Communications

5.4.2.1 ALP Emails

The ALP have copied sections of the Precision Prospecting Ltd (2005) report into GLAA CRG, thereby legalising the abilities of licensed gangmasters to collect charge rates from their FMCs. GLAA charge rates include for example NIC payments from their FMCs and rates also apply to other payments collected from their FMCs including health and

social care payments, holiday payments, maternity pay, apprenticeship payments and auto-enrolment pension payments (Appendix 2.1).

Licensed gangmasters are also enabled to carry out legal deductions directly from workers weekly payslips that work from a CFS which is a ZHC (Appendix 4.11).

The ALP provides a CFS model to their gangmaster members. The REC also provide a CFS Model to their gangmaster members and the REC in conversation in relation to GLAA CRG confirmed they advised "people to the GLAA for guidance" in Table 4.26 for official direction. This means the REC advises all gangmasters to apply the ALP/HO led GLAA CRG, therefore gangmasters providing the licensed and unlicensed workariat (Table 1.1) to government contracts and frameworks also look to and apply GLAA CRG.

The researcher emailed the ALP requesting a copy of the Precision report but the ALP initially denied they had a copy of the report, the ALP also confirmed no one had instructed them to copy information from the Precision report to GLAA CRG. The ALP also did not have their CRG checked by HMRC, because there was nothing in the GLAA CRG for HMRC to check. In any case the ALP stated it was beyond the GLAA remit to provide model contracts; even though it is outside the ALP remit, unless they have government/parliament agreement and HMRC agreement to do this. The researcher has searched for this type of confirmation but has been unable to locate anything. Similar quotes were made by the DLME who also confirmed the GLAA was responsible only for the GLAA licensing scheme because the food sector was removed when the GLA transitioned to the GLAA.

However, gangmaster open borders and gangmaster routes into the UK for example via horticulture do exist and have been intentionally created (parliamentlive.tv, 2023). Together licensed gangmaster stakeholders expand the slightly distorted statistics noted in 2003 (Table 4.28), to hide, expand and enable distortions to the present day for example the 10 million identified by the GLAA in 2018 and 2020 (Table 4.28), thereby expanding EU migrants in the remit of the GLAA into service sectors where peripheral workers on a CFS with no guaranteed hours are not counted correctly by the ONS IDBR and PAYE RTI system identified in subcategories 4.1.6.1, 4.1.6.3.11 and 5.4.3.1.

Payments or deductions from the licensed workariat that work from a CFS/ZHC with no guaranteed hours and no employment rights, have not had their weekly wages checked properly by HMRC for nearly two decades, and in addition, the licensed workariat worked

hours have not been applied to total ONS productivity data that is applied to the Barnett formula, that is applied funding as per citizens employment in each region.

5.4.2.2 GLAA Emails

Charge rates for the licensed workariat on a CFS as employees working 45 hours p.w. continued in GLAA yearly CRG (GLAA, 2023, April; GLAA, 2024, April; GLAA, 2025, April). However, following email exchanges between the GLAA and the researcher, the following GLAA CRG Brief Issue 83 (2024, April) and GLAA CRG Brief Issue 87 (2025, April) had the written quotes referenced as 'DEFRA states' etc on page 1 that had been copied from the Precision report onto the GLAA CRG….removed.

5.4.3 Discussion of Office for National Statistics Data

5.4.3.1 ONS Emails

ONS response emails from Economic Advisors in the Labour Market Department, representatives from the Data Advice and Relations Team, Social Surveys Department, and Statistical Contacts at the Labour Market and Households Division confirmed they were not able to locate GLAA workers in ONS data because *on the LFS it would be dependent on how the person answered the survey*, further stating *if those on a CFS believed they were on a ZHC, then they would be recorded here* (ONS, personal communication, August 3, 2022) confirming there was *nothing specifically on zero hour contracts or CFS* (ONS, personal communication, August 4, 2022). The researcher had copied in the National Statistician and CE of the ONS to ensure their concerns were noted (ONS, personal communication, August 4, 2022), however the National Statistician did not respond to the researcher, and there is no evidence to suggest enquiries with regard to the location of GLAA registered workers continued.

However, the BRES lead and Senior Economic Advisor of the BRES team confirmed they collect samples of employees from 80,000 registered businesses, but agency worker data is collected via their IDBR PAYE RTI system, even though the Senior Economic Advisor confirmed they *aren't able to identify ZHC* (ONS, personal communication, August 3, 2022).

ONS response emails are extremely important because they enabled the researcher with critical realism to piece together Companies House data to GLAA data to ONS data, to the lack of any FMC data at the ONS, the who, what, when, where and why, with the

Senior Economic Advisor example (ONS, personal communication, August 3, 2022) at best described as follows:

FMCs have RUs around the UK. The ONS provide Birdseye, and their head office SIC Codes as one example (ONS, personal communication, August 25, 2022). However, the ONS example of Birds Eye Wall's Ltd is an active company without a SIC Code, Birds Eye Foods (Ireland) Ltd does not have a SIC Code and is registered as an overseas company, Birds Eye Ltd SIC Code is 10890 - manufacture of other food products not elsewhere classified, with Nomad Foods registered as an active overseas company, governed by, and registered in the British Virgin Islands. This means, Birds Eye Ltd can use GLAA registered workers in the RoI and the UK but then avoids HMRC for profitalisation as Private Equity (ONS, personal communication, August 25, 2022).

The ONS does not collect agency worker numbers via the LFS or via BRES, and a CFS or ZHC cannot be identified by the ONS in any surveys including the LFS and by BRES (ONS, personal communication, August 4, 2022). ONS emails to the researcher advised the researcher to collect GLAA registered worker numbers directly from the GLAA, but the GLAA states they do not collect registered worker data even though they do as per Table 4.28. Nonetheless, agency workers are only captured via the IDBR should their gangmaster register them as working via the BRES IDBR PAYE RTI one day a year in September as employees in SIC 78200; Temporary employment agency activities. Be that as it may, estimates of agency workers are then provided by the ONS, should PAYE employment data be lower than that of BRES.

This is extremely important, because the ONS have confirmed their IDBR PAYE RTI system matches to reference numbers of businesses (ONS, personal communication, August 25, 2022) which includes licensed gangmasters as businesses. Therefore, the ONS IDBR PAYE system will not match to all GLAA registered workers who work on a CFS in any MSP Models, because licensed gangmasters do not provide the ONS IDBR PAYE RTI system with RTI of all GLAA registered workers each day. This is because excluded workers are those GLAA registered workers who work less hours than the required PAYE hours for NICs (ONS, 2022, August 2), and in any case, GLAA registered workers on a CFS may not have been given any hours to work that day, which aligns with the three points stated by the Senior Economic Advisor (ONS, personal communication, August 25, 2022). This importantly also aligns with Full Fact (2016, May 12) who described how NICs fail to align with numbers of EU migrants.

The GLAA did not provide registered worker numbers in their remit, however, the GLAA do collect GLAA employed worker numbers of licensed gangmasters on single compliance inspections (even though the workers are not employed), the GLAA provide SAWS seasonal worker quota numbers managed by the HO and DEFRA illustrated earlier in Table 2.2, the GLAA provides inadequate information including the use of a CoE by SAWS workers because in this context, the CoE includes a CFS as per the EAA1973 (GLAA, 2025, January 30) nonetheless, the GLAA collect registered worker data as per Table 4.28.

To help respond to RQ 3, the following category provides an examination of collated ONS employee data as follows:

5.4.3.2 ONS Data

In response to RO 3 for RQ 3, the researcher has located GLAA registered workers in the concept of the precariat at the ONS that inflate Business services, non-Financial Services and Financial Services, thus accelerating and enlarging the Services Sector. This is evidenced by email communications between the researcher and representatives of the ONS that include Economic Advisors in the Labour Market Department, representatives from the Data Advice and Relations Team, representatives from the Social Surveys Department, the Statistical Contact in the Labour Market and Households Division and Senior Economic Advisor from the BRES team, with the National Statistician copied into an email to ensure they knew the researcher was seeking the location of GLAA registered workers at the ONS. However, there is no evidence to suggest that following the researcher's investigations and response emails from the ONS, that Senior Economic Statisticians and Statistical Contacts at the Labour Market and Households Division with the National Statistician and CE of the ONS continued to investigate the questions raised in this research.

Unidentified licensed gangmaster mergers and acquisitions have thus ensured ONS estimated statistics provide high employment figures that incorporate the precariat illustrated in Table 1.1 as employees, when they are in fact the precariat on a CFS which is confirmed as a ZHC by the REC, ALP and ex-Employees of the GLAA in subcategory 4.1.3.2.4, whereby a CFS was primarily to assist short term workers in performing arts and dancing as per the EAA1973 in s.13(1.a), s.13(1.b), s.13(2), s.13(3), s.230(3.b) and s.230(5.b). In any case, it is likely free market liberalism that has enabled the licensed gangmaster sectors to manipulate ONS employment data to rise and fall as required.

The UK adopted the EU Regulation No 177/2008 of the European Parliament and of the Council to establish a common framework for business registers for statistical purposes on the 20th of February 2008, but financial liberalisation of markets provided for gangmaster stakeholders to expand their MSP Models with the researcher's model of this illustrated as Figure 4.2, that would fail to harmonise UK national statistics. This is intentional because gangmasters have been rebranded (Pich et al., 2014) and hidden in ONS statistics to inflate the Financial Services Sector. GLAA registered workers in the concept of the precariat working from a CFS are notedly concealed in ONS statistics as Hidden Incomplete Data, with open border policies for their movement that have been applied but not shared, as an actively flexible army of 10 million with no guaranteed hours is expanded.

Avoidance strategies are patterns of deregulated legislation that are in operation in the UK, but it is not clear who leads these strategies or who put them in place because, workers in Table 1.1 are concealed as HID in ONS data, food manufacturing and food processing data is not included in ONS data, employment and employee definitions deliberately provide limited data collection techniques of the precariat to be counted for example: workers on a ZHC includes those on a CFS/ZHC with no guaranteed hours, that are provided with tick boxes as employees with guaranteed hours in all government data gathering, data accumulation, data assembly and data compilations.

5.5 Summary of Chapter 5

The precariat with the licensed and unlicensed workariat have no clear employment status and licensed gangmasters enjoy open border policies with deregulatory legislation. Some GLAA related data is archived before the 20 year rule and some GLAA related data has been archived to a secure unit before the 20 year rule, and the precariat are very able to be moved or transported as 'low risk' in 'not at risk' goods sections, in the green lane, with the licensed workariat camouflaged and concealed as HID in meat products to provide services in the UK.

To assist this summary, it is very important to note the GLAA is a registration body that collects registered worker numbers of GLAA workers in the concept of the precariat that are displayed in Table 4.28.

However, the GLAA contradicts itself because the GLAA has informed the researcher they do not collect numbers of registered workers in regulated sectors, when they clearly do.

This is significant because the GLAA also confirmed they do not feed worker data to the ONS.

It is therefore extremely important to note the consequences of the GLAA collecting registered worker numbers but then confirming it does not collect registered worker numbers, and that it does not provide any registered worker numbers to the ONS as per Table 4.28. This is of critical importance and requires immediate attention and action because:

Although the researcher's concept of amalgamated laws and legislation implemented into the UK were designed as the researcher's realistic CFS Model (Figure 2.3), this concept as a model is not verified by participants. The researcher's CFS Model (Figure 2.3) was then applied to the researcher's realistic model of a licensed gangmaster MSPM. The researcher did not ask the REC or ALP if either Figure 2.3 or Figure 4.2 described their MSP Models. However, Figure 2.3 drew together GLAA text and discursive and social practise (Fairclough, 1992, p. 73) that identifies the lack of fraud compliance in Figure 2.3 that is directly linked to GLAA CRG that has not been checked by HMRC (ALP, personal communication, September 12, 2022), that in Figure 4.2 illustrates the source of income for licensed gangmaster paymasters, that are linked directly to the CLCS.

Following the evaluation of the researcher's two models (See Figure 2.3 and Figure 4.2), the researcher is able to clarify the LFS estimates numbers of people on a ZHC and applies the same number to each geographical area of the UK with workers on a CFS predominantly in the North of the UK, and the BRES PAYE RTI enables licensed gangmasters to exclude the precariat on a CFS. ONS employment data did not rise following the legal migration of nearly two million workers in 2022 and 2023 (ONS, 2024, November 28) and private stakeholders S&P Global provide data to the House of Commons Purchasing Managers Index collected from KPMG and the REC gangmaster trade association.

Additionally, Invest NI does not collect GLAA registered worker numbers from the private sector, DEFRA oversees the food sectors but does not collect GLAA registered worker numbers including those working in food manufacturing and food processing that

do not have their own ONS category, the DWP RAPID does not collect worker numbers travelling via the CTA, total gangmaster invoices are located in Business Services in the Services sector, any GLAA/MSPMs (Figure 4.2) have not been shared with UK, EU and international citizens and bypass HMRC, the OBR, the Bank of England and HMT.

In addition, ALP provision of GLAA CRG and legislation provides for Private Equity as profitalisation by stakeholders and is not shared with HMRC, the OBR and HMT, the Windsor Framework: a new way forward (HM Government, 2023, February) provides the freedom to move 'not at risk' goods that includes GLAA workers as goods for services within the terms 'agriculture', 'meat products', 'food and other necessary goods', 'meat preparations' and 'processing' in historical legislation absorbed as gangmaster led worker movements, in some cases for example as meat products in pet foods as goods for services, for economic gains with food manufacturing and food 'processing' that do not have their own sectors at the ONS. This provides profitalisation from GLAA registered workers in Table 1.1 via GLAA/MSPMs in Financial Services at the ONS for their licensed gangmaster paymasters and global stakeholders including for example RSS Global (2024) part of Twenty 20 Capital (2024) in Table 4.9 and Money Helper (2025), Fintech Flexible Finance, Sonovate (2025) and EQT (2024) in Appendix 4.12.

The following Chapter 6 is the closing chapter that provides the Conclusions to this research that starts with an introduction, followed by a review of all evidence in relation to Research Questions 1, 2 and 3, practical implications of the research, contributions to knowledge, strengths, weaknesses and limitations of the research, before closing with researcher reflections of their research.

CHAPTER 6: Conclusions

6.1 Introduction

This research project has critically explored the Home Office led GLAA and the regulatory environment of the precariat (Standing, 2011). As a result, one doctrine of neoliberalism was located as the Centralised Labour Control System providing labour market flexibility via strategised CFS and MSP Core-Periphery Models. This is supported by outcomes to the analysis of deregulated historical UK legislation, and primary data collected from stakeholders and respondents with critical realism applied by the researcher. Investigations located the noncompliance of the HO led GLAA with all risk lowered to GLAA registered workers in the concept of the precariat and licensed workariat. This was followed by new interpretations of data at the ONS whereby the researcher located the concealed and obscured precariat as Hidden Incomplete Data, thus, Research Objectives have been met and Research Questions are answered illustrated in Table 6.1 (p. 250).

The following three subcategories provide a review of evidence in relation to each research question, starting with Research Question 1 as follows:

6.2 Review of Evidence: RQ 1. How has the historical, statutory, and functional role of the GLAA developed to regulate the sectors in its remit?

This is the first in-depth analysis of the GLAA and the precariat in their remit. The Literature Review focused an exploration of over five decades of WTO and EU legislation that has been blended together, then applied in free market liberalism to the UK with loopholes in legislation, with some legislative descriptive terms providing for the free movement of people, all of which have enabled the GLAA, precariat and licensed workariat to be concealed as HID in national and global statistics. Neoliberalism is the dominant discourse which is identified, whereby some legislation is applied or changed without parliamentary scrutiny, and the precariat and licensed workariat are located as HID with deregulatory legislation that includes the EAA1973, ERA1996, the Industrial Relations (Amendment) Act 2015, reduced LAPO PACE powers (HMICFRS, 2019), Article 45 of the Treaty on the Functioning of the EU s.3(a) and the Citizens Rights Directive 2004/38/EU.

Research Questions	RQ answered by RO →	Research Objectives
RQ 1. How has the historical, statutory, and functional role of the GLAA developed to regulate the sectors in its remit?	RQ 1 is answered by RO 1 →	RO 1. Investigate the GLAA history, statutory and functional role to regulate labour to the service sectors within its remit in the UK.
RQ 2. Has the governance of the GLAA been effective in protecting the precariat in food manufacturing?	RQ 2 is answered by RO 2 →	RO 2. Critically explore the GLAA governance, evaluating its contribution and role to protect workers in the UK which includes the exploration of GLAA board members, stakeholders and their roles which are regulated by law.
RQ 3. How accurate are the precariat in the GLAA remit recorded in national statistics?	RQ 3 is answered by RO 3 →	RO 3. An examination of data and collection techniques at the ONS that will establish if the precariat (Standing, 2011) on a CFS are provided with a full range of coverage in their data which is essential for government, treasury, finance, economic and social policy making.

Table 6.1: Three Research Questions answered by Three Research Objectives

The GLAA notedly applies and enforces little legislation to assist the licensed workariat in Table 1.1, as deregulated LAPOs inspect and provide licenses to gangmasters. With no collaboration of devolved administrations, immigration and migration remains centralised, thus peripheral workers in (Table 1.1) remain absorbed and concealed as HID, but at the same time, doors are left wide open for people with workers [GLAAC1]. It is also important to note the significance of the GLAA contradicting itself as a registration body that on the one hand provides registered data of peripheral workers in Table 4.28 for policy making but then confirms it does not collect registered data of the licensed workariat and does not provide such data to the ONS (GLAA, 2022, August 23; GLAA, personal communication, September 8, 2022).

This study located the imbalance of power between licensed gangmasters and GLAA registered workers in the concept of the licensed workariat, enabling licensed gangmasters to dominate, influence and control GLAA board members and worker groups at the GLAA, who perhaps accept and internalise dominant discourses. This thesis

provides new understandings of GLAA text and communications, underlying rules and meanings, laws and legislation, and why changes in written text were made, thereby showing multiple forms of discourse whereby for example the licensed workariat have been located and are no longer camouflaged as HID in UK national statistics.

Historical data in the Literature Review fails to mention the GLAA and how licensed gangmasters operate from the EU into GB, it does not detail how licensed gangmasters operate from the wider world into predominantly Yorkshire and the Humber and the North of the UK where data is skewed. This research identifies that governance is not equal in all four countries of the UK, with NI and Scotland not applying the same GLAA legislation to that of England and Wales identified in GLAA Business Plans and Strategies in subcategory 2.2.11. Scotland and NI do not investigate offences under the EAA1973, NMW Act 1999 or as per the Modern Slavery Act 2015 and in any case, Northern Ireland is excluded via The Gangmasters Licensing (Exclusions) Regulations (Northern Ireland) 2014. This provides for the licensed workariat as a commodity via their licensed gangmasters in MSP Models confirmed in subcategories 4.1.3.2.1 to 4.1.3.2.5, to enter the UK in some areas including the North of England unobserved, and where there were no clear controls at GB borders prior to the application of BTOMs (GOV.UK, 2024, February 13).

In Chapters 2 and 4, the researcher chose to assist the reader with their realistic models of a licensed gangmaster CFS Model as Figure 2.3 and a licensed gangmaster MSP Model as Figure 4.2, but the researcher did not ask any participants if the researcher's realistic models were anything like the dominant models licensed gangmasters apply.

Chapter 4 provided supporting data from the REC and ALP in relation to their dominant CFS Model, MSP Model and potential Core and Periphery Models identified in subcategories 4.1.3.2.1 to 4.1.3.2.5. It is the REC and ALP CFS Model and MSP Model that are linked directly to the CLCS identified in Chapter 2 the Literature Review, because Figure 4.5 illustrates the share of total employees on NGHCs across industries showing variations of 7.6% employees in Section N Administration and Support Services, compared with 6% in Section A-E Production with Agriculture (ONS, 2018, April 23a).

To conclude this category, stakeholder data was supported by GLAA worker [GLAAC3] respondent survey data that identified disparities of what is understood and what is not understood, what is applied to them and what is not applied to them, what help they receive and what help they do not receive, but most importantly, what is known and what needs to be known, so that it is shared, corrected and can be learned from.

6.3 Review of Evidence: RQ 2. Has the governance of the GLAA been effective in protecting the precariat in food manufacturing?

This research explored how capitalist activity led by the UKs leading investigative body the GLAA has arguably failed registered workers they were entrusted to support, how non-compliance by licensed gangmasters is standard practice (Ioannou and Dukes, 2021; Mustchin and Lucio, 2020), and how financialisation (Clark, 2016) and weaknesses including non-government monitoring of standards with little or no enforcement in UK labour supply chains with the reluctance of the government to challenge licensed gangmasters, has allowed industry to exploit GLAA registered workers in the concept of the licensed workariat. The GLAA is regulatory, but this establishment in terms of policy has boosted precarious working in the UK to registered peripheral worker data identified in Table 4.28, with free market liberalism in the context of the GLAA secretariat and governance that have directly encouraged and underpinned a movement towards precarious working in the UK, with labour contracting by the economic exploitation of migrating EU and international workers.

Under the scrutiny of government and alongside dominant private sector gangmaster stakeholders and associations, the HO led GLAA emerges as an employer stakeholder led organisation. The results of this study confirm GLAA governance is undertaken by groups of people including licensed gangmaster trade associations as strategic frameworks provide for gangmaster licensing to be guided around EU and UK policies because there is a lack of compliance in supply chains. Findings in Chapters 4 and 5 were interwoven with Chapter 2 the Literature Review, that identified historical GLAA governance data including legislation illustrated in Figure 1.1 and Appendices 1.1, 2.1 and 2.3, with data in Figure 2.1. Therefore, the HO led GLAA receives strategic direction set at high levels from positions of influence because some GLA related data has been removed from observation, with some GLA related data numbered approximately from 26/8.1 to 27.71 of meetings held at DEFRA in June 2010 that have not been shared but placed in a secure area at the UKNA.

Also licensed gangmaster MSP Models have not been shared with citizens in the UK, EU and globally. However MSPMs have now been located, with GLA and GLAA literature indicating HMRC, HMT and bay officials are all involved in the GLAA (Jack and Whiting, 2014, July 11a; Jack and Whiting, 2014, July 11b; Office of Tax Simplification, 2015, March), all of which helped the researcher with critical realism to confirm and

provide ideas in the literature related to the GLAA and GLAA registered workers in their remit, by providing past, present day and future predictions.

This research has linked together registered GLAA workers [GLAAC3] as a new concept and as a new fifth group of the 'precariat' (Standing, 2011) to workers under the regulation of the GLAA and unregulated workers who are mainly migrant labour (Clark and Colling, 2016) in Table 1.1. This study highlighted groups of undervalued segregated workers (Heyes et al., 2018; Moore and Newsome, 2019) as the gap in current social models of employment were examined (Gray, 2013). Findings link the GLAA to Standings (2011) 'Precariat' studies in the context of regulatory theory (Fitzgerald, Hardy and Lucio, 2012), as the significance of the GLAA and government bodies define the limits of the law and regulations pertaining to the precariat (Standing, 2011) in the remit of the GLAA that are discouraged from accessing ETs, because the licensed workariat generally lack access to knowledge and legal representation (Barnard et al., 2018).

This study shows GLAA boards have made employment decisions and building on the work of Gooberman et al. (2017), Heery and Frege (2006) and MacKenzie and Lucio (2014), the HO led GLAA provide no instructions to the unknown numbers of licensed gangmasters who became an LEP, Apprenticeship Training Agency or Group Training Agency that received public funds to provide DWP Work Programmes. Licensed gangmasters worked with other LEPs to place the licensed workariat on a CFS into work within GLAA/MSPMs (Figure 4.2) who firstly, played a role in employment and employee status in the UK (GLA, 2010, April 21a), and secondly, are now confirmed as an unobserved actor in the IR system (Heery and Frege, 2006; MacKenzie and Lucio, 2014), that provide a platform for service sector providers, as literature indicates their involvement in worker employment status, to expand the flexible army of labour as employees in the liberalised Financial Services Sector for profit as Private Equity.

This study shows how commercial ventures of the licensed gangmaster sectors for profit, is extracted from their workers, enabling all risk to be lowered to the precariat (Standing, 2011), as the licensed workariat move or are moved in the 'not at risk' section in MSP Models illustrated as Figure 4.2, in for example meat products in pet food as goods for services, and as employees that receive no guaranteed hours in deregulatory legislation, enabling inputs into food production to benefit stakeholders and gangmaster paymasters (HM Government, 2023, February). Peripheral workers in the GLAA remit illustrated in Table 1.1 are not employees and provide so-called 'work services' on CFSs for licensed

gangmasters in licensed gangmaster MSPMs (Figure 4.2) that are excluded from government literature.

Evidence for RQs 1 and 2 has been merged with a critically real perspective, that now confirms some evidence was strategised to enable the free movement of workers in and out of the UK as the UK joined the EU in 1973 from a central position to be known as the CLCS headlined by the EAA1973.

Drawing on critical realism has enabled this robust framework that provides additional strategised evidence in the form of hidden mechanisms, structures, and power to be added to strategised loopholes in legislation that enabled the creation of the researcher's realistic CFS Models and MSP Models (See Figure 2.3 and Figure 4.2) that exist as concepts of Core-Periphery Models in gangmaster sectors, because both models were identified by two gangmaster trade associations. In any case the application of MSPMs in the concept a Core-Periphery Model i.e., the Financial Services Sector, big business and gangmaster stakeholders [Core], benefit economically from the exploitation of peripheral workers in the concept of the precariat and licensed workariat [Periphery], thus affect the dynamics of periphery regions in the UK including Yorkshire and the Humber, whereby regions experience a lack of development and investment creating substantial inequalities in a Cost of Living crisis.

The researcher sought to enhance the truth and has therefore provided context-specific explanations for complex issues at all levels including the painful empirical level that incorporates the researcher's critically realistic experiences and observations, the actual level in relation to events and specifics of capitalist activity in free market liberalism, and the financial liberalisation of labour for the Financial Services Sector, whereby the researcher has moved beyond the 'empirical' and the 'actual' to the 'real' level to comprise and explain the how and why of hidden causes with new structures, and hidden powers below the surface that have generated the phenomena. These events and happenings enabled the researcher to locate the army of 10 million in ONS statistics as follows:

6.4 Review of Evidence: RQ 3. How accurate are the precariat in the GLAA remit recorded in national statistics?

Licensed gangmasters are sector specific providers but they do not provide GLAA workers under any form of 'Necessity' under any Free Trading Agreement in world trade with 'Most Favoured Nation' clauses. Nonetheless, neoliberalism as the dominant

discourse has enabled gangmaster stakeholders to open borders with gangmaster routes into the UK for their gangmaster paymasters as stakeholders create ONS distortions.

Peripheral workers in Table 1.1 are GLAA workers with the licensed workariat as the fifth group of the 'precariat' (Standing, 2011), because they work from a CFS driven by deregulated legislation illustrated in Figure 1.1 and the Literature Review, with deregulatory legislation applied to the GLAA for example the AWR, WTR1998/WTD and the EAA1973 with job insecurity, no secure hours, no secure pay and in many cases, NRPF or welfare. GLAA registered workers illustrated in Table 1.1 are the precariat (Standing, 2011) because they are precarious, vulnerable and fragile with no resilience to shocks for example the coronavirus pandemic (Standing, 2021). With diminishing security, peripheral GLAA registered workers have had their freedoms marginalised as they provide numerical flexibility in ONS statistics as employees (ONS, 2025, July 17).

It is not the statutory responsibility of the ONS and Secure Research Service to scrutinise the sellers of labour. However, it is the statutory responsibility of the HO led GLAA to provide GLAA registered worker data to the ONS as per Table 4.28. Therefore, the GLAA fails the Statistics and Registration Service Act 2007 because they do not provide GLAA registered worker data and other sector data to the ONS. This is supported by Chapters 4 and 5 whereby the ONS do not receive data from the GLAA and the licensed gangmaster sectors correctly, because the licensed workariat are absorbed and concealed as HID, including the food manufacturing and food processing sectors that do not have their own sectors at the ONS.

In Chapters 4 and 5, participants agree GLAA registered workers in the concept of the licensed workariat are not employees even though some parts of the Precision Prospecting Ltd (2005) report have been pasted into GLAA CRG. This is supplemented by directions to the researcher from the ALP, who incorrectly directed the researcher to the ERA1996 s.230(1.b) to establish employment status for GLAA registered workers, but thereby they did not expose the EAA1973 for examination.

The ONS is not able to locate GLAA workers in industry data or VAT/PAYE data, even though FMCs have RUs with Local Units with/without SIC and SOC Codes to report their employee data to the ONS, the ONS do not collect any data of workers specifically on a ZHC or a CFS, some data is collected in the LFS, gangmasters absorbed in the Section N Administrative and Support service category do not place all GLAA workers into the ONS/HMRC IDBR PAYE RTI system when data is collected once a year,

providing licensed gangmasters with the ability to avoid putting the licensed workariat forward in the ONS IDBR PAYE RTI [one day a year], and should they work less hours than NIC thresholds (ONS, personal communication, August 3, 2022; ONS, personal communication, August 4, 2022; ONS, personal communication, August 18, 2022). GLAA workers [GLAAC3] in the concept of the licensed workariat are therefore not incorporated in ONS statistics correctly and are therefore not incorporated as per the EU Regulation No 177/2008 adopted on the 20th of February 2008 that was set up to establish a common framework for business registers for statistical purposes in the UK, to match the same business registers for statistical purposes in the EU.

Income earned by GLAA registered workers includes for example hourly NIC and Maternity pay, with PAE contributions GLAA workers may not be aware of, collected in SLAs as MSPMs, then applied as per GLAA CRG with examples provided by the researcher in Appendices 2.2 and 4.11 as peripheral workers are moved from job to job. However, the researcher has located the work-based harms (Formby, Sheikh and Jeffery, 2024) directed at the precariat and licensed workariat by licensed gangmasters and their stakeholders that include the exploitation of them all via GLAA CRG provided by the ALP, CFS Models and MSP Models identified by the ALP and REC, with some legislative descriptive terms meaning something else for example, the precariat seem very able to move from the EU via the RoI and their Industrial Relations (Amendment) Act 2015 s.43 and the definition of agriculture that includes for example sorting and packing by the precariat, into NI as an employee using or bypassing the CTA into GB on a CFS via the EAA1973 s.13(1.a), s.13(1.b), s.13(2), s.13(3) and globally into the UK via open border policies (parliamentlive.tv, 2023), and as a commodity for licensed gangmasters in UK legislation that was identified at the outset of this research.

These strategies have thus ensured political discourse can elevate or drop ONS employment statistics, thereby providing high employment figures that incorporate peripheral workers illustrated in Table 1.1 as employees as and when they require, [enlightened of course via UK open borders], when they are in fact working from a CFS as per the EAA1973 s.13(1.a), s.13(1.b), s.13(2), s.13(3), s.230(3.b), s.230(5.b) and incorporated in gangmaster data in the Business sector inflating the Financial Services Sector.

6.5 Practical Implications

The results of this study are compliant, consistent, and strong, and have responded to the Research Aim and all three Research Questions which have been supplemented by many surprises throughout the Literature Review and the Findings and Discussions in Chapters 4 and 5, which support the idea that neoliberalism with policy layering provides legitimate movements of people that are camouflaged as HID in meat products in pet food as goods for services, because ONS employment data did not rise following the legal migration of nearly two million workers (ONS, 2024, November 28), although category 4.1.6.3.7 identified 'value added' to 'prepared pet foods' that show an increase from 120.2 in May 2022 to 126.1 in June 2022 and an increase from 127.5 in January 2023 to 136.9 in February 2023 (ONS, 2023, December 20).

This study has located GLAA peripheral workers as the fifth group of the precariat in Business Services propping up non-Financial Services for Private Equity with licensed gangmasters and businesses based inside and outside the UK, providing foundations for the continuation and growth of labour market flexibility via ongoing arguments for the non-transparent free movement of workers (Table 1.1), hidden in meat products in goods for services, across national, european and international borders, which has consequently opened the door wide for the trafficking of people with workers [GLAAC1].

Findings located the precariat as employees in goods for services with observed travel routes and open borders. Reviews of Companies House and the Bank of England including non-Financial services, business services, subcategories, employment services, a review of HMRC, the sharing of all data including to the OBR, tax loopholes and the ONS, how Companies House operates, and recognising the incorrect application of some so-called labour saving technologies for example, the use of AMT devises have not provided a productivity boom, because workers remain concealed and camouflaged as HID at the ONS, with some workers held in AI technology as workers are pushed to work harder and faster. Closing open borders and loopholes in legislation, tax loopholes by terminating the EAA1973, terminating GLAA CRG, addressing legislation as per subchapter 6.2, and removing the ability of licensed gangmasters to apply MSP Models will in turn assist the UK with the United Nations Goal 8 for "decent work and economic growth" (United Nations, 2024). It is therefore necessary to remove the ability of licensed gangmasters as businesses to continue to purchase people as commodities in modern day slavery.

6.6 Contributions to Knowledge

This is the first theoretical research to examine the GLAA and the first research to link together the concept of the 'Precariat' (Standing, 2011) with workers under the regulation of the GLAA. This research provides significant Contributions to Knowledge because critical realism provides for the researcher's reality, observations, understandings, experience and knowledge with reflections of the licensed gangmaster sector to be incorporated throughout the research, as critical realism bridged the gap between government, treasury, finance, agriculture, food manufacturing, food processing, economic and social policies, and GLAA registered workers identified as the precariat and licensed workariat. From the outset, the researcher argued WTO and EU legislation applied in the UK was incorrect, subsequently finding substantial loopholes in UK legislation, unreliable national and global statistics, multiple forms of discourse with neoliberalism as the dominant discourse, with the researcher's refusal to accept a CFS as anything other than a ZHC. Thus, the research revealed many surprising revelations as previously unknown relationships were revealed, new real ideas explained previously unconfirmed and unexplained phenomena, enabling the researcher to follow the money to gangmaster profitalisation.

This study is significant because it provides valuable new insights about the GLAA and its development, its governance and its actions that relate specifically to GLAA practices related directly to the precariat as defined by Standing (2011). The HO led GLAA is a direct contributor to mass migration because in turn, the HO provides direction to the GLAA and GLAA paymaster gangmasters that direct their MSP Models, with open border policies assisting GLAA sectors, when GLAA work focuses on worker shortages where UK workers will not participate, even though historical evidence suggests the "dearth of UK nationals" highlighted by Precision Prospecting Ltd (2005, p. 27) which has continued to present day (Wilkinson, 2012).

This research provides a contextual examination of the GLAA and its impact on the precariat to inform growth strategies, policy and practice (Etherington and Jones, 2016a), thus adding to practitioner knowledge and the academic community to influence wider social theories of the licensed gangmaster sectors in the UK, academic and practitioner debates concerning precarious workers as the licensed workariat in the GLAA sectors of food manufacturing and food processing, and adds to other employment sectors where

precarious work is prevalent, reported by Thomas et al. (2020) in Sheffield, in the Yorkshire and Humber region of the UK.

Finally, the researcher is able to give accurate summaries because although historical data is reliable and GLAA data in Table 4.28 is reliable, GLAA registered worker data is not provided to the ONS even though it is collected in Table 4.28, and the ONS is not able to locate GLAA CFS or ZHC data in national statistical data. ONS data is therefore not clear and is therefore not reliable.

Nonetheless in completion, this Contribution to Knowledge is supported by evidence, data and analysis that has been integrated and cross validated and is therefore a reliable representative study without GLAA primary input. Access for this research has been extremely difficult, but the researcher succeeded in accessing GLAA workers with the help of the Catholic Church and the strong sample of GLAA stakeholders as participants that helped guide the research. The impact of this research will have a noticeable effect in the UK, because this research is reliable and can be shared widely and globally to better understand the world from the perspective of the precariat. By expanding this knowledge, perspectives will be changed advancing research but importantly, workers in the concept of the precariat and licensed workariat will be located, their data corrected and so learned from.

6.7 Strengths, Weaknesses and Limitations of the Research

This is a significant piece of research because there are no previous research studies of the GLAA or registered workers in their remit. There are completely unexplored mechanisms at play with educated and experienced ideas linking the Literature Review and Findings to outcomes.

Strengths of this study identified robust, consistent, precise and reliable data which was checked for errors from the outset. Data was easy to understand and easy to analyse because critical realism helped the researcher provide an understanding of the licensed gangmaster sector, therefore different data sets complemented each other and as the researcher consolidated critical realism with primary and secondary data, thus new real ideas came to light in the Discussion and Conclusions chapters.

Some limitations to this research include, trade unions choosing not to assist the researcher which may be due to their lack of involvement with GLAA workers and in any

case, respondents have limited English proficiency and little access to trade unions. Nonetheless, snowball sampling had assisted the researcher by directing the researcher to the Catholic Church for access to Respondents. Polish Respondents trust the Catholic Church to assist and support them, and although sample sizes were limited, sufficient information was gathered to respond to the original three Research Objectives, and to answer the three Research Questions.

The same snowball sampling technique would apply to accessing the Participants because the Literature Review incorporates the History of the GLAA in subcategory 2.2 and Worker Employment Status in subcategory 2.3, which were helpful to the researcher in locating licensed gangmaster stakeholders as participants. Participant data then helped the researcher merge and link participant primary data to respondent primary data in Appendices 4.1 to 4.8, whereby the strong sample of respondents identified their lack of understanding and knowledge of employment contracts, and deductions and payments from their weekly pay. This data has subsequently linked the researcher's critical realism to GLAA and ONS data, enabling some GLAA registered workers to be located at the ONS and why so many GLAA registered workers are not presented to the ONS via the IDBR, to understand why some GLAA sectors including food manufacturing and food processing do not have their own sectors at the ONS, and how GLAA CRG supplied by the ALP provides profitalisation for licensed gangmaster paymasters and their stakeholders.

This is followed by threats to the research, which was the researcher comparing and finding WTO and EU legislation as applied or not applied in UK law, UK policies and GLAA, ONS legislation and data as not correct for example, estimated/capped ZHC numbers in EMP:17 People in employment on zero hours contracts (ONS, 2025, May 13) which provided the researcher with the provision to argue the case of a CFS as a ZHC.

Consequently, the researcher located gaps in GLAA related legislation and following that, the researcher proved the location and application of a licensed gangmaster MSPM that is applied to GLAA workers in the UK. The researcher then located GLAA workers in ONS data.

Although literature gaps have been identified, the researcher's unexpected results illustrate the need for further inquiries and future study areas with Critical Realism. Future directions for researchers' are insurmountable and include for example

apprenticeships applied to GLAA workers on a CFS via licensed gangmaster Learning Enterprise Partners, Apprenticeship Training Providers and Group Training Associations that received public funds to provide DWP Work Programmes reported for example by Etherington and Jones (2016b) in Sheffield, because Sheffield and other areas of the UK have an unskilled workforce. There is a need to re-evaluate all data related to GLAA workers because Findings show that GLAA CRG provides the ability for licensed gangmasters to profit from their commodities, and national statistics do not collect GLAA registered worker data correctly.

There has never been a Customs Union in the UK, therefore there is a need to address the influence of gangmaster trade associations including the ALP, REC, APSCo and the WEC acting in the UK, EU and globally, absent sectors at the ONS including food manufacturing and food processing, loopholes for the free movement of GLAA workers via applications of UK legislation pre and post Brexit including Free Trade Agreements for example the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), data applied to the Barnett Formula because the precariat and licensed workariat are absorbed and camouflaged as HID in for example Pet Food, the amount of Private Equity generated by peripheral GLAA workers from regions predominantly in the North of the UK, links to the so-called North South Divide, links to the Cost of Living crisis, the application of EU, ILO and WTO legislation as applied in the UK, any service sector strategies to purchase public service bodies e.g. the NHS via the Financial Services Sector funded via Private Equity generated by GLAA workers, CFS and MSP Core-Periphery Models displayed as the researcher's realistic models Figures 2.3 and 4.2 applied in other GLAA sectors, additional unlicensed gangmaster sectors including hospitality and the music industry, additional workers [GLAAC2], [GLAAC3] and [GLAAC4] that are hidden and camouflaged but can be located in ONS data including hospitality and the music industry, the application of AMTs and AI, the CEST tool, unclear government legislation, the Red Tape Challenge and legislation applied without parliamentary scrutiny, documentation moved to the UKNA before the 20 year rule, SLAs and UK regional disparities.

6.8 Reflections

The research was mediated by Critical Realism provided by the researcher's understandings, observations, reflections and experiences of the licensed gangmaster sectors. These concerns were proposed on the researcher's initial SHU PhD application

whereby the researcher suggested the investigation of worker CFS statistics as an initial research question, because workers on a CFS could not be located by the researcher at that time in national statistics. This was supplemented by three further research questions, one of which incorporated the coronavirus pandemic which was removed due to the research project becoming too extensive. The subsequent Literature Review uncovered many things in relation to the GLAA and workers in their remit, but this information tended to be about what could be seen and acknowledged, which is the opposite to the researcher whereby their natural choice of critical realism guided their research, which allowed and provided for the researcher's perceptions, ideas and guiding causes that shaped licensed gangmaster structures and mechanisms to be illustrated.

Heaths EAA1973 legalised licensed and unlicensed gangmasters, enabling them to copy and expand the precariat in the remit of the HO led GLAA. This has never been researched, but it is primarily unobserved free movement required and acquired via neoliberalism that the researcher located, that was a driving force linked to the creation of the GLA, followed by Brexit, that led to the creation of the GLAA. Playing an important role was the timing of this research because the research was carried out at the same time as new UK legislation was created for example, the Retained EU Law (Revocation and Reform) Bill also known as the Brexit Freedoms Bill (BFB) that applies to England, Scotland and Wales that excludes the liberalised Financial Services Sector.

The researcher became a 'politically conscious actor' (Alvesson, 2003) as the subjective nature of their experience and interpretations thus found them tracking liberalised actions in free market neoliberalism, government actions and political discourse including; responses given by politicians in parliamentary inquiries, actions taken during the coronavirus pandemic that affected the GLAA and workers in their remit, and applications of new legislation. Sometimes the researcher felt they were sat in the heart of the liberalised government because they could foresee and predict their next actions, choices and/or objectives for free movement, as legislation was changed to maintain free movement for licensed gangmasters and GLAA registered workers.

Over the term of the researcher's PhD, all information was initially logged in a Reflective Diary which slowly turned into other research papers for example, diarised loopholes in legislation for the free movement of workers, and gangmaster and stakeholder actions and responses to the coronavirus pandemic that affected the GLAA and workers in their remit. A period of time passed as these papers merged and became a book that provides a diary of events totalling over 300,000 words, with diarised loopholes in legislation for the free

movement of the licensed workariat as the fifth group of the precariat (Standing, 2011) both prior to and following the 23rd of June 2016.

Subcategory 3.4.3 described how the researcher's reflexive analysis (Finlay, 2002) of themselves in the challenging social environment of the licensed gangmaster sector had been essential to articulate the ideas for the research. This led to a new moment of learning whereby the researcher identified a mixture of internal awareness with new data from predicted outcomes that had developed naturally, as patterns in data were located and pieced together which led the researcher through data to the UK 2024 General Election, whereby patterns in data changed.

As a critical realist, the researcher experienced a range of emotions including excitement and a sense of exhilaration when they were able to track actions and political discourse, to a feeling of complete and utter desolation with profound sadness and upset as data was pieced together. This research has provided unexpected breakthroughs with tremendous highs and lows from findings and data, whereby the researcher initially felt victorious but quickly upset and desolate because their reality saw only hardship for GLAA peripheral workers, UK citizens and the UK economy. However, as the researcher's subjective experiences and objective realities were merged, the researcher was able to conclude their research with a sense of winning, because the researcher had identified the hardships so created that need correcting, and with the same sense of winning, by sharing the research with the academic community, trade unions and the new Labour Government to win over the creators of hardship.

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Gangmasters & Labour Abuse Authority. (2015, October). *Issue 42 - October 2015 When to issue a P45 and Registration under the Data Protection Act.*

Appendix 1.1: Chronological Order of GLA now GLAA Regulations

Chronological Order of GLA now GLAA Regulations

International Labour Organization Conventions and Protocols:
C029 - Forced Labour Convention, 1930 (No. 29)
C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
C100 - Equal Remuneration Convention, 1951 (No. 100)
C105 - Abolition of Forced Labour Convention, 1957 (No. 105)
C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
C187 - Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)
C081 - Labour Inspection Convention, 1947 (No. 81)
C122 - Employment Policy Convention, 1964 (No. 122)
C144 - Tripartite Consultation (International Labour Standards) Convention, 1976 (No. 144)
C011 - Right of Association (Agriculture) Convention, 1921 (No. 11)
C012 - Workmen's Compensation (Agriculture) Convention, 1921 (No. 12)
C017 - Workmen's Compensation (Accidents) Convention, 1925 (No. 17)
C019 - Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)
C025 - Sickness Insurance (Agriculture) Convention, 1927 (No. 25)
C085 - Labour Inspectorates (Non-Metropolitan Territories) Convention, 1947 (No. 85)
C102 - Social Security (Minimum Standards) Convention, 1952 (No. 102)
C135 - Workers' Representatives Convention, 1971 (No. 135)
C141 - Rural Workers' Organisations Convention, 1975 (No. 141)
MLC, 2006 - Maritime Labour Convention, 2006 (MLC, 2006)
Police and Criminal Evidence Act (PACE) 1984
Employment Rights Act 1996 (s. 13, s. 14)
The Working Time Regulations 1998
Article 45 of the Treaty on the Functioning of the EU 2004
Citizens' Rights Directive 2004/38/EU
National Minimum Wage Act and Regulations 1998
Employment Agencies Act 1973 Chapter 35
Sex Discrimination Act 1975
Race Relations Act 1976
Disability Discrimination Act 1995
Part-time Workers Regulations 2000
Fixed-term Employees Regulations 2002
Employment Equality Regulations 2003
Employment Equality Regulations 2003
Health and Safety at Work etc. Act 1974
Management of Health and Safety at Work Regulations 1999
Citizens' Rights Directive 2004/38/EU
The Gangmasters (Licensing) Act 2004 (Commencement No.1) Order 2004
The Gangmasters (Licensing) Act 2004 (Commencement No.2) Order 2005
The Gangmasters Licensing Authority 2004
GLA and GLAA Licensing Briefs to present day
GLA and GLAA Licensing Standards to present day
GLA and GLAA Annual Reports and Accounts to 2025
GLA and GLAA Annual Reviews to present day
GLA and GLAA Protocols
Association of Labour Providers 2004
The Information and Consultation of Employees Regulations 2004 (s. 2b)
The Gangmasters (Licensing) Authority Regulations 2005
Hampton Review 2005
Macrory Review 2006
GLA HSE – Options for the Merger of the GLA with HSE 2006
The Gangmasters (Appeals) Regulations (Northern Ireland) 2006
The Gangmasters (Appeals) (Amendment) Regulations (Northern Ireland) 2006
The Gangmasters Licensing (Exclusions) Regulations (Northern Ireland) 2006
The Gangmasters Licensing (Exclusions) Regulations 2006
The Gangmasters Licensing (Licensing Conditions) Rule 2006

The Gangmasters (Appeals) Regulations 2006
The Gangmasters (Licensing Conditions) (No.2) Rules 2006
The Gangmasters (Licensing) Act 2004 (Commencement No.3) Order 2006
The Gangmasters (Licensing) Act 2004 (Commencement No.4) Order 2006
The Transfer of Undertakings (Protection of Employment) Regulations 2006
Fraud Act 2006
The Gangmasters (Licensing Conditions) (No.2) (Amendment) Rules 2007
The Gangmasters (Licensing) Act 2004 (Commencement No 5) Order 2007
Evaluation Study Sheffield University 2007 (GLA, 2007 August; GLA, 2007 October.1)
Baseline Review Sheffield University 2007
The Gangmasters (Licensing Conditions) (No.2) (Amendment) Rules 2008
Social Market Foundation 2008
Directive 2009/38/EC of the European Parliament and of the council of 6th May 2009
National Referral Mechanism 2009
The Gangmasters (Licensing Conditions) Rules 2009
Gangmasters Licensing Authority Hampton Implementation Report 2009
Government Work Placements, New Deal renamed Flexible New Deal 2009
The Gangmasters Licensing (Exclusions) Regulations (Northern Ireland) 2010
The Gangmasters Licensing (Exclusions) Regulations 2010
Working Time Directive
Directive 2008/104/EC of the European Parliament and of the Council of 19 November 2008 on temporary agency work - The Agency Working Regulations 2010
GLA Position on Checking Employment Status 2010
Equality Act 2010
Cabinet Office Code of Conduct for Board Members of Public Bodies 2011
Government Work Placements, Single Work Programme 2011
GLA Brief: Apprenticeships 2011 (not implemented)
The Agency Workers (Amendment) Regulations 2011
GLA Red Tape Challenge 2011-2012
The Gangmasters Licensing (Exclusions) Regulations 2013
The Gangmasters Licensing (Exclusions) Regulations (Northern Ireland) 2014
GLA Memorandum of Understanding Between the GLA and the HSE 2014
DEFRA Triennial Review of Gangmasters Licensing Authority 2014
Home Office takes responsibility of the GLA 2014
Modern Slavery Strategy 2014
Directive 2014/54 of the European Parliament and of the Council
The Gangmasters (Licensing Authority) Regulations 2015
Modern Slavery Act 2015 (Including all Amendments)
GLA responsible for Parts 1 and 2 of the Modern Slavery Act 2015
The Modern Slavery Act 2015, Transparency in Supply Chains Regulations 2015
The Modern Slavery Act 2015, Duty to Co-operate with The Independent Anti-Slavery Commissioner 2016
Government Work Placements, Work and Health Programme 2015
Immigration Act 2016 (Including all Amendments and a DLME)
International Labour Organization (ILO) Fair Recruitment Initiative 2016
The Posted Workers (Enforcement of Employment Rights) Regulations 2016
The Gangmasters and Labour Abuse Authority (Complaints and Misconduct) Regulations 2017
Government Work Placements, Apprenticeship Funding and Skills Training – devolved policy 2017
The Police and Criminal Evidence Act 1984 (Application to Labour Abuse Prevention Officers) Regulations 2017
TUC Undercutters Charter 2018
The Agency Workers (Amendment) Regulations 2019 No. 724
The Collective Redundancies and Transfer of Undertakings (Transfer of Undertakings (Protection of Employment) (Amendment) Regulations 2014
Small Business, Enterprise, and Employment Act 2015
The Agency Workers (Amendment) Regulations 2019
The Employment Rights (Employment Particulars and Paid Annual Leave) Amendment 2018
The Conduct of Employment Agencies and Employment Businesses Regulations 2003 (s. 13)
Employment Rights Act 1996 (s. 1)
Principles to Guide Government Action to Combat Human Trafficking in Global Supply Chains 2018
The Parental Bereavement (Leave and Pay) Act 2018

HM Government Good Work Plan 2018
The Working Time (Coronavirus) (Amendment) Regulations 2020
The Working Time (Coronavirus) (Amendment) Regulations (Northern Ireland) 2020
The Health Protection (Coronavirus, International Travel) (England) Regulations 2020 (S.I. 2020/568)
The Health Protection (Coronavirus, Restrictions) (No. 3) (England) Regulations 2020 (S.I. 2020/750)
The Health Protection (Coronavirus, Wearing of Face Coverings in a Relevant Place) (England) Regulations 2020 (S.I. 2020/791)
The Health Protection (Coronavirus, Collection of Contact Details etc. and Related Requirements) Regulations 2020 (S.I. 2020/1005)
The Health Protection (Coronavirus, Restrictions) (Self-Isolation) (England) Regulations 2020 (S.I. 2020/1045)
The Health Protection (Coronavirus, Restrictions) (Local Authority Enforcement Powers) (England) Regulations 2020 (S.I 2020/1375)
Agriculture Act 2020 (s. 24)
The Posted Workers (Agency Workers) Regulations 2020
The UK's points-based immigration system: information for EU citizens
GOV.UK: EU Settlement Scheme (settled and pre-settled status)
GOV.UK: EU Settlement Scheme: employer toolkit
Home Office: Employer right to work checks supporting guidance
GOV.UK: View and prove your immigration status (eVisa)
Agriculture Act 2020 (s. 24)
Immigration and Social Security Co-ordination (EU Withdrawal) Act 2020
Department for Business, Energy & Industrial Strategy, Guidance on calculating holiday pay for workers without fixed hours or pay
The Posted Workers (Agency Workers) Regulations 2020: concerning the posting of workers in the framework of the provision of services, by modifying the Agency Workers Regulations 2010
Trade and Agriculture Commission (TAC) 2021
IR35: Changes to off payroll working for intermediaries and contractors (GOV.UK, 2021)
Check Employment Status Tool (GOV.UK, 2021)
The Immigration (Restrictions on Employment and Residential Accommodation) (Prescribed Requirements)
and Codes of Practice) and Licensing Act 2003 (Personal and Premises Licenses) (Forms) (Order 2021
Immigration and Social Security Co-ordination (EU Withdrawal) Act 2020
The Immigration Act 2016 (Commencement and Transitional Provisions No. 1) (England and Wales) Regulations 2021
The Immigration and Social Security Co-ordination (EU Withdrawal) Act 2020 (Consequential, Saving, Transitional and Transitory Provisions) (EU Exit) Regulations 2020
The Immigration (Restrictions on Employment and Residential Accommodation) (Prescribed Requirements)
and Codes of Practice) and Licensing Act 2003 (Personal and Premises Licences) (Forms) Order 2021
The Ports Services Regulations 2019
The Pilotage Port Services EU Exit 2020
Northern Ireland Protocol
Command Paper of the Northern Ireland Protocol
Northern Ireland Protocol Bill
The Windsor Framework (Democratic Scrutiny) Regulations 2023
Windsor Framework
Safeguarding the Union
The Windsor Framework (Constitutional Status of Northern Ireland) Regulations 2024
The Windsor Framework (UK Internal Market and Unfettered Access) Regulations 2024
The Marking of Retail Goods Regulations 2024
Applicability Motion Regulation (EU) 2023/2419

Gangmasters &
Labour Abuse Authority

GLAA Brief

Issue 78 –
April 2022
Charge Rate
Guidance

This Brief publishes the latest guidance on indicative minimum charge rates between labour providers and labour users, effective from 1 April 2022. This Brief replaces GLAA Brief 68.

Introduction

This indicative guidance sets out the minimum charge rates to apply between a labour provider and labour user. The rates cover statutory requirements as well as a basic overhead. This latest guidance takes account of new national minimum/living wages, national insurance thresholds, the new Health and Social Care Levy, increased labour sourcing and retention costs, increased transport, PPE and other Covid-19 related costs and Scotland, Wales and Northern Ireland agricultural minimum wage increases.

These rates are effective from April 2022. The rates do not include any margin for a labour provider's profit. The figures have been compiled for the GLAA by the Association of Labour Providers (ALP). This Brief replaces GLAA Brief 68.

Please note that these rates are purely indicative. Depending on its business model, a labour provider could charge less than the rates published. However, any figure significantly less than the published rates raises concerns of non-compliance to reduce costs. The GLAA will closely scrutinise charges that are less than the published rates to make sure the labour provider is operating compliantly.

Statutory Charge Factors

This includes the appropriate minimum wage, employer's national insurance, statutory holiday entitlement, Apprenticeship Levy and pension auto-enrolment costs at 3% of qualifying earnings.

Labour Provider Overhead and Service Charge Costs

Defra analysis conducted in 2003 estimated labour provider overhead costs as 30% on top of the National Minimum Wage. In reaching this figure Defra state that the result is not intended to be a realistic description of the costs of any particular labour provider business (e.g. it makes no attempt to allow for the costs of rent/interest charges on office accommodation, which may vary widely from one business to another). It also states that this figure is likely to understate the actual costs for almost all businesses as well as making no allowance for management costs or profit. Rather this is intended to be an illustration of the minimum unavoidable costs that flow from observing the law on basic employment matters such as the minimum wage, national insurance, employers' liability insurance, and maintaining and insuring roadworthy vehicles.

The figure for Overhead and Service Charge Costs is indicative only and will vary with each contract depending on the efficiency of a labour provider and the particular circumstances of the client and site to which labour is supplied. For example, contracts where the labour provider is required to provide workwear, where there is volatility of supply, where transport or supervision costs are high, where invoices are factored and so on will all incur a greater overhead cost.

The actual rate charged is a commercial agreement between the labour provider and user. Any agreed rate should take into account the particular costs of supply. Charge rates lower than those in the rates tables **plus a sustainable net margin** may indicate illegal activity - unless there is a legitimate and demonstrable explanation.

NATIONAL MINIMUM WAGE AND NATIONAL LIVING WAGE	Apprentices	Age 16 - 17	Age 18 - 20	Age 21 - 22	Age 23 plus
1. Minimum wage	£4.81	£4.81	£6.83	£9.18	£9.50
2. Employers' National Insurance ("NI") Contributions				£0.66	£0.71
3. Employers' Health and Social Care Levy Contributions				£0.06	£0.06
4. Annual Holiday Pay (5.6 weeks entitlement)	£0.58	£0.58	£0.82	£1.22	£1.26
5. Apprenticeship Levy (for businesses with over £3m paybill)	£0.03	£0.03	£0.04	£0.05	£0.05
6. Pensions Auto-Enrolment Cost (3% of qualifying earnings)				£0.19	£0.20
7. Total Wage Costs	£5.42	£5.42	£7.69	£11.36	£11.78
8. Guideline Statutory Sick/Maternity Pay cost	£0.17	£0.17	£0.17	£0.17	£0.17
9. Guideline Minimum Labour Provider Overhead & Service Cost	£1.00	£1.00	£1.00	£1.00	£1.00
Hourly Cost of Supply (not including Labour Provider Margin)	**£6.59**	**£6.59**	**£8.86**	**£12.53**	**£12.95**

WALES AGRICULTURAL EMPLOYEES (to be confirmed)	Grade 1 & Age 21-22 & <52 weeks	Grade 1 & Age 23+ & <52 weeks	Grade 1 Overtime no holiday	Grade 1 Overtime with holiday
1. Minimum wage	£9.18	£9.50	£14.25	£14.25
2. Employers' NI Contributions	£0.65	£0.69	£1.97	£1.97
3. Employers' Health and Social Care Levy Contributions	£0.06	£0.06	£0.18	£0.78
4. Annual Holiday Pay	£1.36	£1.41		£2.28
5. Apprenticeship Levy (for businesses with over £3m paybill)	£0.05	£0.06	£0.07	£0.08
6. Pensions Auto-Enrolment Cost (3% of qualifying earnings)	£0.18	£0.19	£0.43	£0.43
7. Total Wage Costs	£11.49	£11.92	£16.89	£19.18
8. Guideline Statutory Sick/Maternity Pay cost	£0.17	£0.17		
9. Guideline Minimum Labour Provider Overhead & Service Cost	£1.00	£1.00	£1.00	£1.00
10. Hourly Cost of Supply (not including Labour Provider Margin)	**£12.66**	**£13.09**	**£17.89**	**£20.18**

SCOTLAND AGRICULTURAL EMPLOYEE	All Ages	Overtime no holiday	Overtime with holiday
1. Minimum wage	£9.50	£14.25	£14.25
2. Employers' NI Contributions	£0.69	£1.97	£1.97
3. Employers' Health and Social Care Levy Contributions	£0.06	£0.18	£0.18
4. Annual Holiday Pay	£1.26		£2.03
4a. Special Holiday Pay	£0.09		£0.15
5. Apprenticeship Levy (for businesses with over £3m paybill)	£0.06	£0.07	£0.08
5. Pensions Auto-Enrolment Cost (3% of qualifying earnings)	£0.19	£0.43	£0.43
6. Total Wage Costs	£11.86	£16.89	£19.08
7. Guideline Statutory Sick/Maternity Pay cost	£0.17		
8. Guideline Minimum Labour Provider Overhead & Service Cost	£1.00	£1.00	£1.00
9. Hourly Cost of Supply (not including Labour Provider Margin)	**£13.03**	**£17.89**	**£20.08**

Workers with appropriate qualification are entitled to be paid an additional sum of at least £1.32 per hour.

NORTHERN IRELAND AGRICULTURAL EMPLOYEES	Age 21-22 & <40 weeks Service	Age 23+ & <52 weeks Service	overtime no holiday	<40 weeks Overtime with holiday
1. Minimum wage	£9.18	£9.50	£14.25	£14.25
2. Employers' NI Contributions	£0.65	£0.69	£1.97	£1.97
3. Employers' Health and social Care Levy Contributions	£0.06	£0.06	£0.18	£0.18
4. Annual Holiday Pay	£1.22	£1.26		£2.03
5. Apprenticeship Levy (for businesses with over £3m paybill)	£0.05	£0.05	£0.07	£0.08
6. Pensions Auto-Enrolment Cost (3% of qualifying earnings)	£0.18	£0.19	£0.43	£0.43
7. Total Wage Costs	£11.34	£11.76	£16.89	£18.93
8. Guideline Statutory Sick/Maternity Pay cost	£0.17	£0.17		
9. Guideline Minimum Labour Provider Overhead & Service Cost	£1.00	£1.00	£1.00	£1.00
10. Hourly Cost of Supply (not including Labour Provider Margin)	**£12.51**	**£12.93**	**£17.89**	**£19.93**

Total Wage Costs include charge items numbers 1-6 shown in green covering statutory legal requirements.

Labour Provider Overhead Costs – DEFRA analysis has estimated overhead costs as 30% on top of the National Minimum Wage, but state that this figure is likely to understate the actual costs of almost all businesses **as well as making no allowance for management costs or profit**. In reaching this figure of 30% Defra state that the result is not intended to be a realistic description of the costs of any particular labour provider business (e.g. it makes no attempt to allow for the costs of rent/interest charges on office accommodation, which may vary widely from one business to another). Rather this is intended to be an illustration of the minimum unavoidable costs that flow from observing the law on basic employment matters such as the minimum wage, national insurance, employers' liability insurance, and maintaining and insuring roadworthy vehicles. Labour providers should ensure that their own fixed, variable and service costs are properly reflected in the charge rate offered to labour users together with sustainable business profit.

Definitions and Explanations

The numbers below refer to the numbered charge elements in the rates tables above:

1. The hourly minimum rate represents the National Minimum/Living Wage and Agricultural Minimum Wage for Grade 1 workers on commencement. The rate increases in Northern Ireland after 40 weeks' service for workers aged under 25; and after 52 weeks' service for agricultural sick pay in Scotland, and Northern Ireland (plus a holiday increment).

   Workers employed in agriculture in Northern Ireland, Scotland and Wales have a statutory entitlement to overtime after 39 hours (after 48 hours during the first 26 weeks of employment in Scotland) in accordance with the appropriate Wages Order.
   N.B. There is no protection from age discrimination for rates above the NMW, hence the ALP uses the overtime rate for over 25s for workers aged under 25.

2. Employer's National Insurance (NI) must be paid at 13.8% on earnings above the secondary threshold of £175 per week for workers aged above 21. The first £175 is NI free (NI free up to the Upper Secondary Threshold for workers below 21). The NI figures for non-overtime rates are based on 40 hours worked in non-agriculture and 39 hours in agriculture.

   For temporary agricultural employees working overtime, the £175 NI free amount will generally already have been used so employer's NI has been calculated at the full 13.8%.

From April 2022 until March 2023, the Health and Social Care Levy will be applied as a 1.25% increase in the Employers NI rate. From April 2023, the

- Levy will be separated but still applied in the same way as NI contributions at a rate of 1.25%. For clarity, this charge is shown as a separate line on the calculation, rather than incorporate it into the NI line. This enables labour providers and their clients to see the impact of this new employment tax

- Holiday Pay

  a. Calculations of holiday pay to be charged are based on the hourly rate plus employers' NI and pension as when holiday pay is paid to the worker, both of these must be paid and therefore need to be accrued from the charge rate.

  b. Non-Agricultural Workers - are entitled to 5.6 weeks' holiday (calculated pro rata as 12.07% of the hourly rate and NI = 5.6 weeks / (52 weeks-5.6 weeks).

     Agricultural Employees in Wales - Workers are entitled to a variable amount of "total annual holiday entitlement" depending on how many days per week they have retrospectively worked. Based on a 5-day week, workers are entitled to 31 days paid annual holiday from the first day of work equivalent to 13.54% of the hourly rate and NI.

     Agricultural Employees in Scotland - are entitled to 5.6 weeks' holiday plus 2 special days per year. A week is equivalent to the number of days that an

     employee would be expected to work in a regular working week. This is equivalent to 13.04% of the relevant hourly rate and NI.

     Agricultural Employees in Northern Ireland - are entitled to 5.6 weeks' holiday equivalent to 12.07% of the hourly rate and NI. After the completion of 12 months' continuous employment with the same employer the annual holiday entitlement increases to 5.8 weeks paid annual holiday equivalent to 12.55% of the relevant hourly rate and NI.

  c. With regard to accrual of holiday for workers who work irregular hours:

     When working on assignment where that worker works a fixed number of hours in a week or other period specified in the Worker Assignment Sheet (which forms part of the contract with that worker), and where for hours worked above these fixed number of hours the worker is entitled to overtime pay, these fixed hours are considered the "normal working hours". "Normal working hours" also include periods of guaranteed and non-guaranteed compulsory overtime and also voluntary overtime which is "sufficiently regular so as to amount to normal remuneration" but will not include infrequent and irregular voluntary overtime.

However, where hours are not specified in the contract or there are no fixed number of hours above which the worker is entitled to overtime pay there are no “normal working hours” and all hours worked will accrue holiday.

Holiday pay is based on the average hourly rate over the previous 52 weeks (replacing weeks in which no pay was received with previous weeks worked) for “normal working hours” or all hours where there are no “normal working hours”. Pay used to calculate holiday pay should include any **payments intrinsically linked to the work done** such as shift pay, performance related bonuses etc.
Members should refer to the ALP Brief “Calculating Paid Holiday Entitlement for Agency Workers” for more detail.

- The Apprenticeship Levy applies to all employers with a payroll of over £3 million (including agency workers on contracts for services) and is a statutory charge of 0.5% on all pay elements subject to employer’s NI.

- Pension auto-enrolment is a statutory minimum of 3% of qualifying earnings for eligible workers who have not opted out. The calculation assumes all workers are eligible and enrolled on day one. However, most labour providers defer payment for the first three months, a proportion of workers will not be eligible and a further proportion will opt out. Labour providers may choose to calculate their actual cost of statutory pension provision across their business or an individual client and use this more accurate costing instead

- This figure shows the actual minimum unavoidable Total Wage Costs to meet minimum legal requirements.

- Provision for statutory sick pay absence, in line with the Defra estimate of 2 weeks, plus a third week for 2021, reflecting the additional SSP costs of the coronavirus

  pandemic. at £99.35 per week accrued on normal time only, not on overtime. This figure also covers the 8% of statutory maternity, paternity, adoption and statutory shared parental pay payments that must be met by the labour provider.

  Agricultural wages sick pay is payable in Northern Ireland, Scotland and Wales after 52 weeks’ employment.

Guideline Minimum Labour Provider Overhead & Service Cost - Indicative figure. 2003 DEFRA analysis estimated overhead costs as 30% on top of the National Minimum Wage, but state that this figure is likely to understate the actual costs of almost all businesses as well as making no allowance for management costs or profit. In reaching this figure, Defra state that the result is not intended to be a realistic description of the costs of any particular labour provider business (e.g. it makes no attempt to allow for the costs of

- rent/interest charges on office accommodation, which may vary widely from one business to another). It also makes no allowance for any management cost or business profit. Rather this is intended to be an illustration of the minimum unavoidable costs that flow from observing the law on basic employment matters such as the minimum wage, national insurance, employers' liability insurance, and maintaining and insuring roadworthy vehicles.

- This is the total hourly cost of supply but does not include any margin to cover labour provider profit**.**

Further information

1. If you have any questions regarding the figures in the above tables, please contact the ALP.

2. If you any further queries, please contact the GLAA helpline on 0345 602 5020 or email licensing@gla.gov.uk.

3. For the latest news and updates from the GLAA:

Twitter: @UK_Glaa Facebook: TheGLAA

If you have received a hard copy of this Brief but would prefer electronic versions in the future, please email communications@gla.gov.uk

Appendix 2.2: An illustration in England of economic gains from an example of workers [GLAAC3] working at one FMC, all working from a CFS incorporated on a 5-day week payroll.
The same hourly charge rate levies and costs provided by GLAA via the ALP CRG would apply to other so-called employees and the so-called self-employed and/or GLAA registered workers [GLAAC3] (Table 1.1) in England.

GLAA Brief Issue 78 - April 2022, Charge Rate Guidance (GLAA, 2022, April) provides:

- Charge Rate Guidance for England, aged 23 plus (GLAA, 2022, April) includes charge rate levies and costs including: Health and Social Care Levy (GOV.UK, 2022, April 6), NIC charge, Holiday pay charge, Apprenticeship Levy, Pensions Auto-Enrolment Levy, Sick/Maternity charge, Overhead and Service Cost and the NLW/NMW Charges
- One FMC 5-day week payroll from Licensed Gangmaster for 1,500 workers [GLAAC3]
- 1,500 GLAA workers [GLAAC3] work across 2 shifts total 750 workers [GLAAC3] per shift
- All GLAA workers are recruited onto a CFS which is a ZHC
- All GLAA workers [GLAAC3] have been provided with varied hours

Example of 5 workers [GLAAC3] hours with the GLAA National Insurance Contributions charge of £ 0.71 p.h.:

Worker A: Works 48 hours x £ 0.71 = £ 34.08

Worker B: Works 25 hours x £ 0.71 = £ 17.75

Worker C: Works 20 hours x £ 0.71 = £ 14.20

Worker D: Works 15 hours x £ 0.71 = £ 10.65

Worker E: Works 30 hours x £ 0.71 = £ 21.13

Totals: 138 hours £ 97.81 NIC charged for 5 workers [GLAAC3]

138 hours = 5 workers

20,148 hours = 750 workers (1 shift)

40,296 hours = 1500 workers (2 shifts)

40,296 hours x £ 0.71 NIC charge = £ 28,610.16 NIC paid by FMC to Gangmaster

Example of 5 workers [GLAAC3] hours with the GLAA Health and Social Care Levy charge of £ 0.06 p.h.:

Worker A: Works 48 hours x £ 0.06 = £ 2.88

Worker B: Works 25 hours x £ 0.06 = £ 1.50

Worker C: Works 20 hours x £ 0.06 = £ 1.20

Worker D: Works 15 hours x £ 0.06 = £ 0.90

Worker E: Works 30 hours x £ 0.06 = £ 1.80

Totals: 38 hours, £ 8.28 Health and Social Care Levy charged for 5 workers [GLAAC3]

138 hours = 5 workers

20,148 hours = 750 workers (1 shift)

40,296 hours = 1500 workers (2 shifts)

40,296 hours x £ 0.06 Health and Social Care Levy charge =
£ 2,417.76 Health and Social Care Levy paid by FMC to Gangmaster

Example of 5 workers [GLAAC3] hours with the GLAA Annual Holiday Pay charge of £ 1.26 p.h.:

Worker A: Works 48 hours x £ 1.26 = £ 60.48

Worker B: Works 25 hours x £ 1.26 = £ 31.50

Worker C: Works 20 hours x £ 1.26 = £ 25.20

Worker D: Works 15 hours x £ 1.26 = £ 18.90

Worker E: Works 30 hours x £ 1.26 = £ 37.80

Totals: 138 hours £ 173.88 Holiday Pay charged for 5 workers [GLAAC3]

138 hours = 5 workers

20,148 hours = 750 workers (1 shift)

40,296 hours = 1500 workers (2 shifts)

40,296 hours x £ 1.26 Holiday Pay charge = £ 50,772.96 Holiday Pay paid by FMC to Gangmaster

Example of 5 workers [GLAAC3] hours with the GLAA Apprenticeship Levy charge of £ 0.05 p.h.:

Worker A: Works 48 hours x £ 0.05 = £ 2.40

Worker B: Works 25 hours x £ 0.05 = £ 1.25

Worker C: Works 20 hours x £ 0.05 = £ 1.00

Worker D: Works 15 hours x £ 0.05 = £ 0.75

Worker E: Works 30 hours x £ 0.05 = £ 1.50

Totals: 138 hours £ 6.90 Apprenticeship Levy charged for 5 workers [GLAAC3]

138 hours = 5 workers

20,148 hours = 750 workers (1 shift)

40,296 hours = 1500 workers (2 shifts)

40,296 hours x £ 0.05 Apprenticeship Levy charge = £ 2,014.80 App Levy paid by FMC to Gangmaster

Example of 5 workers [GLAAC3] hours with the GLAA Pensions Auto-Enrolment charge of £ 0.20 p.h.:

Worker A: Works 48 hours x £ 0.20 = £ 9.60

Worker B: Works 25 hours x £ 0.20 = £ 5.00

Worker C: Works 20 hours x £ 0.20 = £ 4.00

Worker D: Works 15 hours x £ 0.20 = £ 3.00

Worker E: Works 30 hours x £ 0.20 = £ 6.00

Totals: 138 hours £ 27.60 Pensions Auto-Enrolment charged for 5 workers [GLAAC3]

138 hours = 5 workers

20,148 hours = 750 workers (1 shift)

40,296 hours = 1500 workers (2 shifts)

40,296 hours x £ 0.20 Pensions Auto-Enrolment charge = £ 8,059.20 Pensions Auto-Enrolment paid by FMC to Gangmaster

Example of 5 workers [GLAAC3] hours with the GLAA Sick/Maternity Pay charge of £ 0.17 p.h.:

Worker A: Works 48 hours x £ 0.17 = £ 8.16

Worker B: Works 25 hours x £ 0.17 = £ 4.25

Worker C: Works 20 hours x £ 0.17 = £ 3.40

Worker D: Works 15 hours x £ 0.17 = £ 2.55

Worker E: Works 30 hours x £ 0.17 = £ 5.10

Totals: 138 hours £ 23.46 Sick/Maternity Pay charged for 5 workers [GLAAC3]

138 hours = 5 workers

20,148 hours = 750 workers (1 shift)

40,296 hours = 1500 workers (2 shifts)

40,296 hours x £ 0.17 GLAA Sick/Maternity Pay charge =
£ 6.850.32 GLAA Sick/Maternity Pay paid by FMC to Gangmaster

Example of 5 workers [GLAAC3] hours with the Minimum Labour Provider Overhead & Service Cost charge of £ 1.00 p.h.:

Worker A: Works 48 hours x £ 1.00 = £ 48.00

Worker B: Works 25 hours x £ 1.00 = £ 25.00

Worker C: Works 20 hours x £ 1.00 = £ 20.00

Worker D: Works 15 hours x £ 1.00 = £ 15.00

Worker E: Works 30 hours x £ 1.00 = £ 30.00

Totals: 138 hours £ 138.00 Minimum Labour Provider Overhead & Service Cost charged for 5 workers [GLAAC3]

138 hours = 5 workers

20,148 hours = 750 workers (1 shift)

40,296 hours = 1500 workers (2 shifts)

40,296 hours x £ 1.00 Minimum Labour Provider Overhead & Service Cost charge =
£ 40,296.00 Minimum Labour Provider Overhead & Service Cost paid by FMC to Grandmaster

Example of 5 workers [GLAAC3] hours with the National Living Wage charge of £ 9.50 p.h.:

Worker A: Works 48 hours x £ 9.50 = £ 456.00

Worker B: Works 25 hours x £ 9.50 = £ 237.50

Worker C: Works 20 hours x £ 9.50 = £ 190.00

Worker D: Works 15 hours x £ 9.50 = £ 142.50

Worker E: Works 30 hours x £ 9.50 = £ 285.00

Totals: 138 hours £ 1,311.00 National Living Wage charged for 5 workers [GLAAC3]

138 hours = 5 workers

20,148 hours = 750 workers (1 shift)

40,296 hours = 1500 workers (2 shifts)

40,296 hours x £ 9.50 National Living Wage charge =
£ 382,812.00 National Living Wage paid by FMC to Gangmaster

Gangmaster sends payroll to FMC with or without individual charge rates shown on the payroll (As per SLA)

Gangmaster then invoices FMC with total weekly payroll hours:

40,296 Hours

£ 11.78 Total wage costs

£ 0.17 Sick/Maternity optional charge
£ 1.00 Minimum Labour Provider Overhead and Service Level

£ 12.95 = Total GLAA Charge Rate Guidance with Sick/Maternity optional charge
£ 12.78 = Total GLAA Charge Rate Guidance without Sick/Maternity optional charge

Minus: National Insurance Contributions £ 0.71 x 40,296 hours = £ 28,610.16
(Large portion of this: Concealed Economic Driver and Profit)

Minus: Health and Social Care Levy £ 0.06 x 40,296 hours = £ 2,417.76
(Large portion of this: Concealed Economic Driver and Profit)

Minus: H/Pay £ 1.26 x 40,296 hours = £ 50,772.96
(Large portion of this: Concealed Economic Driver and Profit)

Minus: Apprenticeship Levy £ 0.05 x 40,296 hours = £ 2,014.80
(Large portion of this: Concealed Economic Driver and Profit)

Minus: Pensions Auto-Enrolment £ 0.20 x 40,296 hours = £ 8,059.20
(Large portion of this: Concealed Economic Driver and Profit)

Minus: Sick/Maternity Pay £ 0.17 x 40,296 hours = £ 6,850.32
(Large portion of this: Concealed Economic Driver and Profit)

Minus: Minimum Labour Provider
Overhead and Service Level £ 1.00 x 40,296 hours = £ 40,296.00

Minus National Living Wage £ 9.50 x 40,296 hours = £ 382,812.00

Total = £ 521,833.10

Total Payroll invoice, including Sick/Maternity charge:

40,296 hours x £ 12.95 = £ 521,833.20

Total Payroll invoice, not including Sick/Maternity charge:

40,296 hours x £ 12.78 = £ 514,982.88

Appendix 2.3: GLA and GLAA Board Meetings 2006-2024

GLA and GLAA Board Meetings 2006-2024
Attended by: Board Members, Executives, Stakeholders and Observers

2006-2014
GLA Board
GLA Executive Team
DEFRA
Internal Audit and Impact Assessment
Security Systems
LPC
Sheffield University
Liverpool University
Gangmasters
Emmet UK Ltd
DWP
Pay and Worker Rights Helpline
Equality and Human Rights Commission
Local Government Regulation
Nottinghamshire Police
ETI
REC
Union of Shop, Distributive and Allied Workers (USDAW)
Welsh Assembly Government (WAG)
ALP
Unite the Union
TUC
Market Operator Services Ltd (MOSL)
HMRC
DTI
Local Authorities Coordinators of Regulatory Services (LACORS)
Police Service Area (PSA)
HO
Payplan
Ringlink
Department of Agriculture and Rural Development Northern Ireland (DARDNI)
Scottish Executive's Environment and Rural Affairs Department (SEERAD)
National Audit Office (NAO)
Association of Chief Police Officers (ACPO)
Sea Fish Industry (SFI)

2015-2020
GLA and GLAA Boards
GLA and GLAA Executive Team
ALP
Home Office
HMRC
Immigration Enforcement
Security Industry Association (SIA)
British Retail Consortium (BRC)
Modern Slavery Unit
Audit Remuneration Committee (ARC)
Remuneration Committee (RemCo)

Slavery and Exploitation Unit
DLME
Home Office Sponsorship Unit
Home Office Modern Slavery and Organised Immigration Crime Unit
BEIS
EASI
IASC
NFU
NFU Scotland
Food and Drink Federation (FDF)
Fresh Produce Consortium (FPC)

2021-2023
GLAA Boards
GLA and GLAA Executive Team
Home Office
HMRC
ALP
Association of Chartered Certified Accountants (ACCA)
Industrial Relations (IR)
HR Director
Former Non-executive Directors (NED)
Immigration Services Commission (ISC)
Forcer Police Members
Former NGOs

Year	Representation at GLA/GLAA Board Meetings 2006-2020	Extracts taken from a variety of GLA/GLAA Board meetings, Audit and Risk Meetings and GLAA associated reports.
2005-2007	GLA BM DARDNI WAG SEERAD DEFRA DWP HMRC PSA NAO ACPO HO LACORS REC ALP x 2 SFIA BRC FDF NFU FPC NFUS SAGB USDAW TGWU GMB Union TUC ETI NACAB	The Gangmasters (Licensing Authority) Regulations 2005 (s. 4) made provision for the structure, constitution and other matters relating to the GLA's operation. The GLA proposed a licensing scheme. Following approval from ministers, The Gangmasters Licensing (Conditions) Rules 2006 were laid before parliament. The Audit and Risk Committee provided the process for control, risk, and governance. A GLA/HSE merger was under discussion alongside possibilities of merging with the EASI, HMRC and the DWP. The GLA confirmed the CE or the Chairman of the GLA would handle any request of Disclosure of Information under the Freedom of Information Act 2000. The DTI gave workers the option to opt in or out of accommodation and transport provision. Licensed gangmasters were given the option to limit the information given to a worker about their job.

Department for Environment, Food & Rural Affairs. (2007). *Gangmasters Licensing Authority Value for Money Study Internal Audit Division.* https://www.gla.gov.uk/media/1974/gla-15-75-vfm-review.pdf

Gangmasters Licensing Authority. (2006, April 26a). *Annex A - GLA10/7.3 HSE – Developed options for GLA merger*. https://www.gla.gov.uk/media/2011/gla10-73-annex-a-gla-board-merger-options-paper.pdf

Gangmasters Licensing Authority. (2006, April 26b*). GLA10/7.3 Hampton Models.* https://www.gla.gov.uk/media/2010/gla10-73-hampton-models.pdf

Gangmasters Licensing Authority. (2006, January). *8.1 Key Issues from Consultation.* https://www.gla.gov.uk/media/1991/gla8-81-key-issues-from-consultation.pdf

Gangmasters Licensing Authority. (2006, March). *GLA 9/7.1 Audit and Risk Committee.* https://www.gla.gov.uk/media/2000/gla9-71-audit-and-risk-committee.pdf

Gangmasters Licensing Authority. (2007, January 18*). GLA13/8.6 Disclosure of Information under the Freedom of Information Act 2000*. https://www.gla.gov.uk/media/1947/gla-13-86-disclosure-of-information.pdf

Gangmasters Licensing Authority. (2007, June 7). *GLA15/6.2 Recruitment of Chief Executive.* https://www.gla.gov.uk/media/1969/gla-15-6-2-recruitment-of-ceo.pdf

Gangmasters Licensing Authority. (2007, October 18a*). GLA16/7.1 Risk Profile Implementation.* https://www.gla.gov.uk/media/1979/gla-16-7-1-risk-profile.pdf

Gangmasters Licensing Authority. (2007, September). *GLA 20/8.2 Hampton Implementation Review.* https://www.gla.gov.uk/media/1933/gla-2082-hampton-implementation-review.pdf

Macrory, R. B. (2006, November). *Regulatory Justice: Making Sanctions Effective*.. https://www.regulation.org.uk/library/2006_macrory_report.pdf

2008-2010	GLA BM DARDNI WAG SEERAD DEFRA DWP HMRC PSA NAO ACPO HO LACORS BERR REC ALP x 2 SFIA BRC FDF NFU FPC NFUS SAGB USDAW TGWU GMB TUC ETI NACAB	The Hampton Implementation Review Report enabled the GLA Board to work towards areas of highest risk. The Gangmasters (Licensing Authority) Regulations 2005 gave the Board power to set up Liaison Groups. The GLA Executive formalised Liaison Groups for Labour Providers, Labour Users and Worker Representative organisations with board members chairing each group. The Board reappointed their Deputy Chairman. The Gangmasters (Licensing) Act 2004 disapplied EAA1973 and The Conduct of Employment Agencies and Employment Businesses Regulations 2003. The GLA had replicated the provisions of the Conduct Regulations in the Gangmasters (Licensing Conditions) Rules 2009 but following the BERR consultation in June 2009, the GLA Board highlighted two changes that would modify its gangmaster rules. BERR merged with the Department for Innovation, Universities and Skills and was renamed the Department for BIS bringing together work and training. The GLA responded to a BIS public consultation, overriding BERR June terms, adding additional ones that "may increase the risk of illegal migrants being provided" making it "difficult to prove a labour provider's involvement in supply chains as labour providers would no longer be required to retain records which document their involvement" (GLA, 2009, October 7, p. 2). The GLA Board noted an increase in enforcement activity, unlike Compliance Inspections, and expressed concern over

		low sentences imposed on unlicensed gangmasters to the Lord Chief Justice. Action was taken to circulate a map of frontline staff and an organogram to Board members. DEFRA outlined its Food 2030 vision alongside its desire for workers to receive specialist skills and career paths. The April Implementation of Key Reports provides "Recommendations" (GLA, 2010, April 21) from four reports - Hampton Inspection report, Sheffield and Liverpool Universities report, WISE: Forced Labour in the UK and the GLA and Equality and Human Rights Commission Meat Enquiry. The GLA sought responses from governmental departments. The GLA Board was unable to assist workers and sought awareness training through the Citizens Advice Bureau and unions. The November Implementation of Key Reports "Recommendations" (GLA, 2010, November 25) shows the majority of points referred for consideration to DEFRA with some points responded to, and a handful closed including no further action for "standardised recruitment and employment practices for the meat processing industry" (p. 16).

Department for Business Innovation and Skills. (2009, September). *Gangmasters Licensing Authority: A Hampton Implementation Review Report Better Regulation Executive National Audit Office.* https://www.gla.gov.uk/media/3667/hampton-gangmasters-report-44pp.pdf

Department for Business Innovation and Skills. (2012, October). *No Stone Unturned in pursuit of Growth.* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/34648/12-1213-no-stone-unturned-in-pursuit-of-growth.pdf

Gangmasters Licensing Authority. (2008, April 16). *GLA 18/7.6 Board Membership.* https://www.gla.gov.uk/media/1919/gla-18-76-board-membership.pdf

Gangmasters Licensing Authority. (2009, April 22). *GLA 22/7.1 Liaison Groups.*

Gangmasters Licensing Authority. (2009, April 22a). *GLA 22/7.4 Reappointment of the GLA Deputy Chairman*. https://www.gla.gov.uk/media/1870/gla-22-74-reappointment-of-the-gla-deputy-chairman.pdf

Gangmasters Licensing Authority. (2009, June 17). *GLA 23/8.4 Conduct Regulations Consultation.* https://www.gla.gov.uk/media/1879/gla-23-84-conduct-regulations-consultations.pdf

Gangmasters Licensing Authority. (2009, October 7). *GLA 24/7.1 Conduct Regulations review.* https://www.gla.gov.uk/media/1883/gla-24-71-conduct-regulations-consultations-final.pdf

Gangmasters Licensing Authority. (2010, April 21). *GLA26/8.3 Implementation of Key Reports" Recommendations.* https://www.gla.gov.uk/media/1840/gla-26-83-implementation-of-key-reports-recommendations-combined.pdf

Gangmasters Licensing Authority. (2010, April 21c). *Minutes of the Twenty-Sixth Board Meeting.* https://www.gla.gov.uk/media/1834/minutes-of-26th-board-meeting-final-2.pdf

Gangmasters Licensing Authority. (2010, November 25). *GLA 27/8.8 Implementation of Key Reports" Recommendations*. https://www.gla.gov.uk/media/1855/gla-26-8-8-implementation-of-key-reports-recommendations-combined-nov-board.pdf

2011-2014	GLA BM DARDNI WAG SEERAD	Matters including serious noncompliance and criminality were discussed at ministerial level. BIS made recommendations for the GLA. The Davey Review remained under evaluation.

	DEFRA DWP HMRC PSA NAO MOSL ACPO HO LACORS BIS REC ALP x 2 SFIA BRC FDF NFU FPC NFUS SAGB UNITE USDAW TGWU GMB TUC ETI NACAB	The Cabinet Office recommended DEFRA engage with the GLA to reduce the size of the Board, members expressed their concerns about the inclusion of stakeholders. DEFRA held a public consultation to reduce the burden on so-called compliant licensed gangmasters. The GLA sought Board agreement to several proposals before sending to DEFRA, which included a review of the benefits of a Trades Union Protocol and information from CAB. Department for Environment Food and Rural Affairs (2013, August) confirmed unnecessary burdens would be removed from low-risk sectors. In 2015, the HO took responsibility of the GLA from DEFRA. DEFRA informed the GLA Board that recruitment and skill requirements for the new Board would be made by Ministers. Responding, the GLA Board suggested recruitment should include criteria and knowledge of their workers employment rights and knowledge of business models. The new GLA Board would consist of a Chair and up to eight independent board members, appointed by the Secretary of State in consultation with the Minister of Agriculture, Environment and Rural Affairs in Northern Ireland with/or variations of four stakeholder groups comprising Labour User, Labour Provider, Worker and Retailer.

Department for Environment Food & Rural Affairs. (2013, August). *Response to the consultation on the government's proposed changes to the scope and governance of the Gangmasters Licensing Authority*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/232205/gla-consult-sum-resp-20130827.pdf

Gangmasters Licensing Authority. (2011*). Extract from MacDonald Review of Farming: GLA recommendations.* https://www.gla.gov.uk/media/1812/extract-mcdonald-review-of-farming.pdf

Gangmasters Licensing Authority. (2011, January 13*). GLA 28/8.3 Macrory approach (Regulatory Enforcement Sanctions)*. https://www.gla.gov.uk/media/1827/gla-28-83-macrory-approach.pdf

Gangmasters Licensing Authority. (2011, October 12). *GLA 31/9.3 Code of Conduct.* https://www.gla.gov.uk/media/1807/gla-31-93-code-of-conduct.pdf

Gangmasters Licensing Authority. (2011, October 12a). *GLA 31/10.2 Appointment of Board Members.* https://www.gla.gov.uk/media/1808/gla-31-102-appointment-of-board-members-3.pdf

Gangmasters Licensing Authority. (2011, October 12b). *Minutes of the Thirty First Board Meeting.* https://www.gla.gov.uk/media/1802/minutes-of-31st-board-meeting-12-october-2011-1.pdf

Gangmasters Licensing Authority. (2012, January 18). *GLA32/7.1 Report from Audit and Risk Committee to Board*. https://www.gla.gov.uk/media/1794/gla-32-71-report-from-arc-to-board.pdf

Gangmasters Licensing Authority. (2012, January 18a). *Minutes of the Thirty Second Board Meeting.* https://www.gla.gov.uk/media/1792/minutes-of-32-board-meeting.pdf

Gangmasters Licensing Authority. (2012, October 17). *Minutes of the Thirty Fifth Board Meeting.* https://www.gla.gov.uk/media/1760/35th-board-meeting-minutes-1.pdf

Gangmasters Licensing Authority. (2013, April 17). *GLA 37/8.2 GLA Consultation on changes to Application and Licensing Procedures.* https://www.gla.gov.uk/media/1726/gla-37-82-gla-consultation-changes-to-application-and-licensing-proceduresdoc.pdf Gangmasters Licensing Authority. (2014, April 2). *GLA 41/10 Future Board Governance.* https://www.gla.gov.uk/media/1697/gla4110-future-board-governance-final-2-4-14.pdf Gangmasters Licensing Authority. (2014, October 15). *GLA 43/10 Future Board Governance.* https://www.gla.gov.uk/media/1647/gla4310-future-board-governance.pdf		
2015-2018	GLAA Temporary Chair (MOSL) GLAA CE GLAA Senior Management HMRC HO LGR SG BEIS HSE REC ALP x 2 SFIA BRC FDF NFU SAGB UNITE PIR SIA AHCL	HO responsibility includes the remit of the GLAA which now covers the whole economy, much increased from the areas covered by the GLA. The GLAA would become a new labour inspectorate where a new enforcement order addresses serious breaches of labour law by asking business to eliminate licensing breaches. Following appointment, the new Board chose an additional appointment of a Deputy Chair to be changed by the GLAA Board each year. The GLAA set up a panel of law firms to provide them with advice on licensing decisions, employer law with the GLAA acting as an employer. The agreement would be worth up to £30,000 per year (LocalGovernmentlawyer, 2016, August 25). The GLA transitioned to the GLAA. The Immigration Act 2016 provided for a strategy from the DLME. Parliament ministers chose board members and a chair. This would not be a tripartite approach. GLA commitments included: 13 pop-up seminars led by GLA Board members across the UK working with the IASC, strengthening links in Europe, working with the RoI Workplace Relations Commission in Spain, Belarus, Dubai, Taiwan, Malaysia, and the wider world. The GLAA remained accountable to ministers for their modern slavery remit and enforcement and registration through the HO Crime Policing and Fire Group. The GLAA made contributions to gangmaster licensing in parts of Australia. A government response to the DLME strategy was in progress. This was separate to a Taylor et al. (2017) public report. The Board were informed of key objectives to reforms of the NRM. The NI Parliament was not sitting, causing delays to the appointment of additional board members and chair. The Home Secretary commissioned a report into modern slavery. Interim findings would be available in 2019.
Gangmasters Licensing Authority. (2015, July 15). *GLA 46/14 Appointment of Deputy Chair.* https://www.gla.gov.uk/media/1607/gla-4614-appointment-of-deputy-chair.pdf Gangmasters & Labour Abuse Authority. (2017, April). *Business Plan 2017 – 2018 April 2017.* https://www.gla.gov.uk/media/3400/glaa-business-plan-2017-18.pdf		

Gangmasters Licensing Authority. (2017, April 26). *53rd GLA Board Meeting.* https://www.gla.gov.uk/media/3148/gla-53-board-meeting-minutes.pdf

Gangmasters & Labour Abuse Authority. (2017, September). *CEO's Quarterly Report.* https://www.gla.gov.uk/media/3342/gla-56-13-ceo-report.pdf

Gangmasters & Labour Abuse Authority. (2018, July 18). *GLAA 60th Board Meeting.* https://www.gla.gov.uk/media/4402/60th-board-meeting-minutes-public-domain-version.pdf

Gangmasters & Labour Abuse Authority. (2018, November 21). *GLAA 62nd Board Meeting.* https://www.gla.gov.uk/media/4413/62nd-board-meeting-minutes-public-domain-002.pdf

Gangmasters & Labour Abuse Authority. (2018, September 18). *GLAA 61st Board Meeting*. https://www.gla.gov.uk/media/3921/glaa-61st-board-meeting-minutes.pdf

Local Government Lawyer. (2016, August 25). *Gangmasters Licensing Authority to set up its first legal services panel*. https://localgovernmentlawyer.co.uk/marketplace/525-tenders/31332-gangmasters-licensing-authority-to-set-up-its-first-legal-services-panel

2019-2020	GLAA Temporary Chair (MOSL) GLAA CE GLAA Senior Management PCC HO NED x 3 IASC x 2 ALP SFIA UNITE Prof IR SIA HR	Ministers chose not to recruit additional board members. The government accepted several Taylor et al. (2017) recommendations including a reference to a SEB. Sub committees ARC and RemCo continued to work with members from the GLAA Board. BEIS and the DLME provided new areas of enforcement. The IASC outlined their strategic plan for 2019-2021 to the GLAA Board. The HO provided advice to Ministers on its response to the Transparency in Supply Chains (TISC). In 2020-2021 the GLAA used the performance from its 2018-2019 strategy as a baseline. Just two enforcement notices would be issued by GLAA in the first quarter of 2020. In 2020 an interim CE from the HO provided critical support to the GLAA. The Employment Bill to establish the SEB was delayed. Work between the DLME and the NMW EAS continued, their strategy awaited approval from the HO, alongside responses to the GLAA 2019-20 strategy and 2020-21 strategy. The GLAA considered its participation, its protocols and whether they would be of value to the IASC maturity framework. The GLAA sought feedback from the ALP on a new approach following a 'deep dive' session into regulation. Close engagement with the NCA encouraged secondments into the Joint Slavery and Trafficking Analysis Centre which supported the GLAA's intelligence function. The new Trade and Agriculture Commission incorporated representatives from all nations of the UK (GOV.UK, 2020, July 10). The commission is an advisory body, not a decision-making body. At the end of its fixed six-month term, it would provide the DTI with its report which would advise the government on farming and trade opportunities whilst maintaining a commitment to animal welfare and high food production standards.

		The GLAA 69th Board Meeting confirmed the GLAA Business Plan 2020-21 and GLAA Strategy 2020-23. Both strategies awaited ministerial decisions. The current GLAA Board and Chair appointments ended at the end of 2020. Board members requested skills and expertise requirements to Ministers, HO and the Cabinet Office. GLAA licensing in the textile trade was considered with a paper to be produced alongside HO, BEIS and DLME findings from the Leicester textiles investigation which in turn, had generated interest in the SEB. RemCo visited the GLAA to carry out an HR policy review. The GLAA 70th Board Meeting confirmed the Leicester textiles project was led by BEIS and the GLAA who sought to test potential areas of a forth coming SEB. Joint working continued between the GLAA, DLME and IASC. The GLAA 71st Board Meeting confirmed ministerial approval for the GLAA Strategic Plan 2020-2023 and Business Plan 2020-2021. BEIS Ministers were keen to explore whether TISC enforcement should become part of the new SEB responsibilities. The "HO confirmed that they support self-sufficiency of the licensing function which was welcomed by the Board" (GLAA, 2020, November 4a, p. 5) and performance measures for 2021 should reflect work carried out in the Leicester textiles enquiry. BEIS hosted an SEB programme which considered "NMW access to HMRC data post migration" via a designated stakeholder working group. The meeting confirmed temporary schemes for low skilled workers.

Gangmasters & Labour Abuse Authority. (2019, June). *GLAA Strategy for Protecting Vulnerable and Exploited Workers – 2019-22 June 2019*. https://www.gla.gov.uk/media/4991/glaa-strategic-plan-2019-22.pdf

Gangmasters & Labour Abuse Authority. (2019, May 1). *GLAA 64/26 Sub-Committee Election.* https://www.gla.gov.uk/media/4626/glaa-64-26-sub-committee-election.pdf

Gangmasters & Labour Abuse Authority. (2019, May 1a). *GLAA 64th Board Meeting.* https://www.gla.gov.uk/media/4889/glaa-64-board-meeting-minutes.pdf

Gangmasters & Labour Abuse Authority. (2020). *GLAA 2020-21 Q1 Performance Report.* https://www.gla.gov.uk/media/6110/public-facing-glaa-2020-21-q1-performance-report.pdf

Gangmasters & Labour Abuse Authority. (2020, April 29a). *GLAA 68th Board Meeting.* https://www.gla.gov.uk/media/5968/glaa-69-03-minutes-of-the-previous-meeting-002.pdf

Gangmasters & Labour Abuse Authority. (2020, April 29b). *GLAA 69th Board Meeting.* https://www.gla.gov.uk/media/5968/glaa-69-03-minutes-of-the-previous-meeting-002.pdf

Gangmasters & Labour Abuse Authority. (2020, January 22). *GLAA 67th Board Meeting.* https://www.gla.gov.uk/media/5792/glaa-67-minutes-final.pdf

Gangmasters & Labour Abuse Authority. (2020, January 27). *Gangmasters and Labour Abuse Authority Annual Report and Accounts 1 April 2018 to 31 March 2019, Presented to Parliament pursuant to section 23 of the Gangmasters (Licensing) Act 2004.* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/860870/CCS0120840566-001_Gangmasters_and_Labour_Abuse_Web_Accessible.pdf

Gangmasters & Labour Abuse Authority. (2020, July 22). *GLAA69/11a Stakeholder Engagement Update.* https://www.gla.gov.uk/media/5975/glaa-69-11a-stakeholder-engagement.pdf

Gangmasters and Labour Abuse Authority. (2020, July 23). *GLAA appoints interim CE.* https://www.gla.gov.uk/whats-new/press-release-archive/23072020-glaa-appoints-interim-ceo/

Gangmasters & Labour Abuse Authority. (2020, November 4). *GLAA 71.09 Compliance Strategy – Proposed Consultation*. https://www.gla.gov.uk/media/6389/glaa71-09-compliance-strategy.pdf

Gangmasters & Labour Abuse Authority. (2020, November 6). *GLAA 66th Board Meeting*. https://www.gla.gov.uk/media/5548/glaa-66-minutes-final.pdf

Gangmasters & Labour Abuse Authority. (2020, September 2). *GLAA 70th Board Meeting.* https://www.gla.gov.uk/media/6347/draft-minutes-2-september-final_.pdf

GOV.UK. (2020, July 10). *Trade and Agriculture Commission membership announced.* https://www.gov.uk/government/news/trade-and-agriculture-commission-membership-announced

2021-2024	GLAA CE former PCC, HO GLAA MOSL/IAS GLAA CE GLAA Senior Management HO x 5 APCC, NED x 3 IASC x 2 H&S x 1 BEIS x 2 Packaging/Food x 2 Equalities SFIA SAFERjobs Prof IR SIA HR x 2 Food ACCA ISC Equalities ALP HSE Kwik Fit Taylor Review panel AHDB	RemCo visited the GLAA to design for and to avoid organisational harm to the authority. HR Policy Approval Flowcharts were agreed, with minor changes required to: the Variation of Duty, Privacy Policy, Pay and Reward Policy, Recruitment and Selection Policy, Dignity at Work Statement, Grievance Policy and the GLAA Bonus Scheme. It was agreed that several HR policies could wait until April to enable the GLAA to focus on a planned "revision of Recruitment and Selection Policy and Procedure and developments relating to the GLAA Bonus Scheme" (GLAA, 2021, January 27, p. 2). In 2021, GLAA annual Accounts and Reports were laid before parliament. The HO began interviewing for two new GLAA board members and a GLAA Chair. The new Modern Slavery Victim Care Contract (MSVCC), now live in Wales. The GLAA launched a review of board performance (GLAA, 2021, January 27) requesting GLAA board members to add to and change questions on a questionnaire, to then send to themselves. Their People and Change Team would then flag up issues for the GLAA board to discuss. The University of Nottingham Rights Lab began research on the effect of Covid-19 on Romanian Seasonal Migrant Workers. The GLAA would pilot the RCWS and new national qualification. The Seasonal Workers Pilot notably included workers arriving at the UK from countries the GLAA had never worked with. Following the coronavirus pandemic, an underspend was noted and the GLAA would receive confirmation of funding from the HO with confirmation the vacant Director of Operations position would not be filled. In 2021, the GLAA considered what amendments might be helpful for the new SEB via the HO regarding the temporary licensing scheme. The appointment of a new GLAA CEO was subject to scrutiny by the Home Affairs Committee. A new Risk Performance and Governance strategy was required. The wording on the GLAA Strategic Plan 2020-23 for Objectives 2 and 5 had been changed. Although recommended every three years, no external assessors were employed to assess the GLAA boards performance for 2020-21. The GLAA Board would decide to

		continue with their internal assessment inviting no feedback from the outside by sending themselves questionnaires. In 2021 at the April GLAA board meeting the IASC provided an overview of their strategic priorities from their Strategic Plan for 2021-22. This included information received from Focus on Labour Exploitation (2021, March) the failure of the SAWS pilot to protect seasonal workers from deceptive recruitment, worker debt and squalid but expensive accommodation. There was no discussion regarding the two licensed gangmasters that recruited and brought the workers into the UK. The GLAA Board discussed the consultation response to their compliance strategy. A draft compliance strategy was designed for discussion at their following meeting. Following significant consultations with the GLAA Executive, colleagues, Board and HO, the Board approved their Strategic and Business Plan. Following advice from the College of Policing, the GLAA and Board confirmed their new Governance Action Plan would stretch over two years, with the board to review their Statement of Governance. A new GLAA chair would commence in post from May. The GLAA met with representatives from BEIS, HO and the ALP. BEIS confirmed that over the last decade bodies had worked together and the SEB was a response to that. The SEB Programme Board discussed data, powers, operations and to oversee bringing the bodies together. "Another challenge is that new areas that the state has never enforced will be added into the SEB. It is yet to be seen how holiday pay and sick pay enforcement will work" (GLAA, 2021, July 21, p. 4). "National minimum wage enforcement is currently done from within HMRC with access to tax and business data. The question is how this will be done when enforcement is no longer done from within HMRC" (p. 4). The GLAA bonus scheme was cancelled, RemCo would not provide a performance related bonus in 2021, but probably a small in-year reward of some kind. The Board approved the new external complaints procedure, the Corporate Governance Framework and External Complaints Procedure with a Grievance Policy to be reviewed. Early 2022 and following a spending review, the GLAA received a flat cash settlement in line with all arm's length bodies. The GLAA waited for results from the UK governments new Employment Bill that would clarify what a new SEB would look like, with the GLAA to act as a first responder to the SEB. The GLAA and Justice and Care were successful for funding from the HO for a Victim Navigator Role. Gangmaster License fees had not increased since 2010. The GLAA looked at how they could evolve their governance with terms of reference for a new development board. BEIS requested a GLAA draft report on textiles or Operation Tacit in Leicester to be taken to the Gold Group. There was a new focus on Equality, Diversity, and Inclusion with ongoing engagement with the HO regarding law enforcement. The staffing of a new SEB may affect staff at the GLAA whereby

		staff may move from being a public servant to a civil servant. "The demand for application inspections, even with the move to virtual inspections, is putting stress on the licensing team. In October there were 84 applications – some are speculative, 25 are in progress. The number of applications is going up. One of the reasons for this is the Seasonal Workers Pilot. The number of applications for the Seasonal Worker Pilot from oversees providers outside the EU was increasing but GLAA licensing checks do not cover their business (GLAA, 2021, November 3). The GLAA continued to receive updates from GLAA labour provider, labour user and worker NGO meetings regarding workers not paid for time spent in inductions, withheld holiday pay or calculated incorrectly, poor quality accommodation and businesses not understanding piece rates, even though the workers on a CFS are consistently referred to as employed. Mid 2022 and the GLAA Budget deficit was cut to £ 250,000. A target operating model was created to influence lessons learnt, particularly around the "compliance strategy and recruitment" (p. 4). The GLAA has an ambition to place intelligence central to the authority, but new risks were identified, primarily 'inadequate data as an evidence base' and 'update of policies and SOPs' (GLAA, 2022, May 10, p. 5). Three observers attended the 80th GLAA board meeting from Capgemini (GLAA, 2023, February 9). The GLAA board did not respond "to research published by the University of Nottingham on car washes and the Leicester garment industry. The Board noted that car washes are a control strategy priority, based on a good risk assessment" (GLAA, 2023, March 31, p. 4). Observers to the 84th GLAA board meeting included a member from Integrated Development Ltd representing how people and organisations think about people and organisations (GLAA, 2023, May 16). Minutes of the 85th GLAA Board Meeting (GLAA, 2023, November 15) mention the delay to a GLA Brief with regard to holiday pay and holiday accruals that has been suspended due to advice given to the GLAA. Discussion re Illegal Migration Act Scenario Planning. In 2024: No more GLAA Board Minutes available Forthcoming GLAA Board Meetings are as follows: 18th September and 20th November 2024. In 2024, the GLAA received three new board members, one from the Agriculture and Horticulture Development Board (AHDB), a second representation with experience from Kwik Fit and a facilities management company and a third with experience in higher education, SAFERjobs and as a member of the ministerial advisory panel to the Taylor Review of Good Work (GLAA, 2024a).

Focus on Labour Exploitation. (2021, March). *Assessment of the risks of human trafficking for forced labour on the UK Seasonal Workers Pilot*. https://labourexploitation.org/publications/assessment-of-the-risks-of-human-trafficking-for-forced-labour-on-the-uk-seasonal-workers-pilot/#:~:text=Drawing%20on%20primary%20data%20collected,deception%20about%20the%20nature%20of

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Gangmasters & Labour Abuse Authority. (2021, January 27). *GLAA72/17 Remuneration Committee.* https://www.gla.gov.uk/media/6828/glaa72-19-remuneration-committee-chairs-report.pdf

Gangmasters & Labour Abuse Authority. (2021, January 27a*). GLAA72/18 Launch of Review of Board Performance*. https://www.gla.gov.uk/media/6829/glaa72-18-launch-of-review-of-board-performance.pdf

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Gangmasters & Labour Abuse Authority. (2021, January 27c). *GLAA72/15 Stakeholder Engagement update*. https://www.gla.gov.uk/media/6827/glaa72-15-stakeholder-engagement-update.pdf

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Gangmasters & Labour Abuse Authority. (2021, November 3). *GLAA 75th Board meeting.* https://www.gla.gov.uk/media/7888/75th-glaa-board-031121-minutes-public-facing.pdf

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Gangmasters & Labour Abuse Authority. (2022, February 22). *76th GLAA Board meeting.* https://www.gla.gov.uk/media/8356/glaa76-board-meeting-minutes-public-facing.pdf

Gangmasters & Labour Abuse Authority. (2022, May 10). *77th GLAA Board meeting.* https://www.gla.gov.uk/media/8581/glaa77-board-minutes-003.pdf

Gangmasters & Labour Abuse Authority. (2023, February 9). *Minutes - 80th Board Meeting.* https://www.gla.gov.uk/who-we-are/the-glaa-board/board-minutes-and-papers-2023/minutes-80th-board-meeting

Gangmasters & Labour Abuse Authority. (2023, March 31). *81st GLAA Board Meeting*. https://www.gla.gov.uk/media/9548/board-minutes-public-final.pdf

Gangmasters & Labour Abuse Authority. (2023, May 16). *82nd GLAA Board Meeting.* https://www.gla.gov.uk/media/9584/public-82nd-board-minutes.pdf

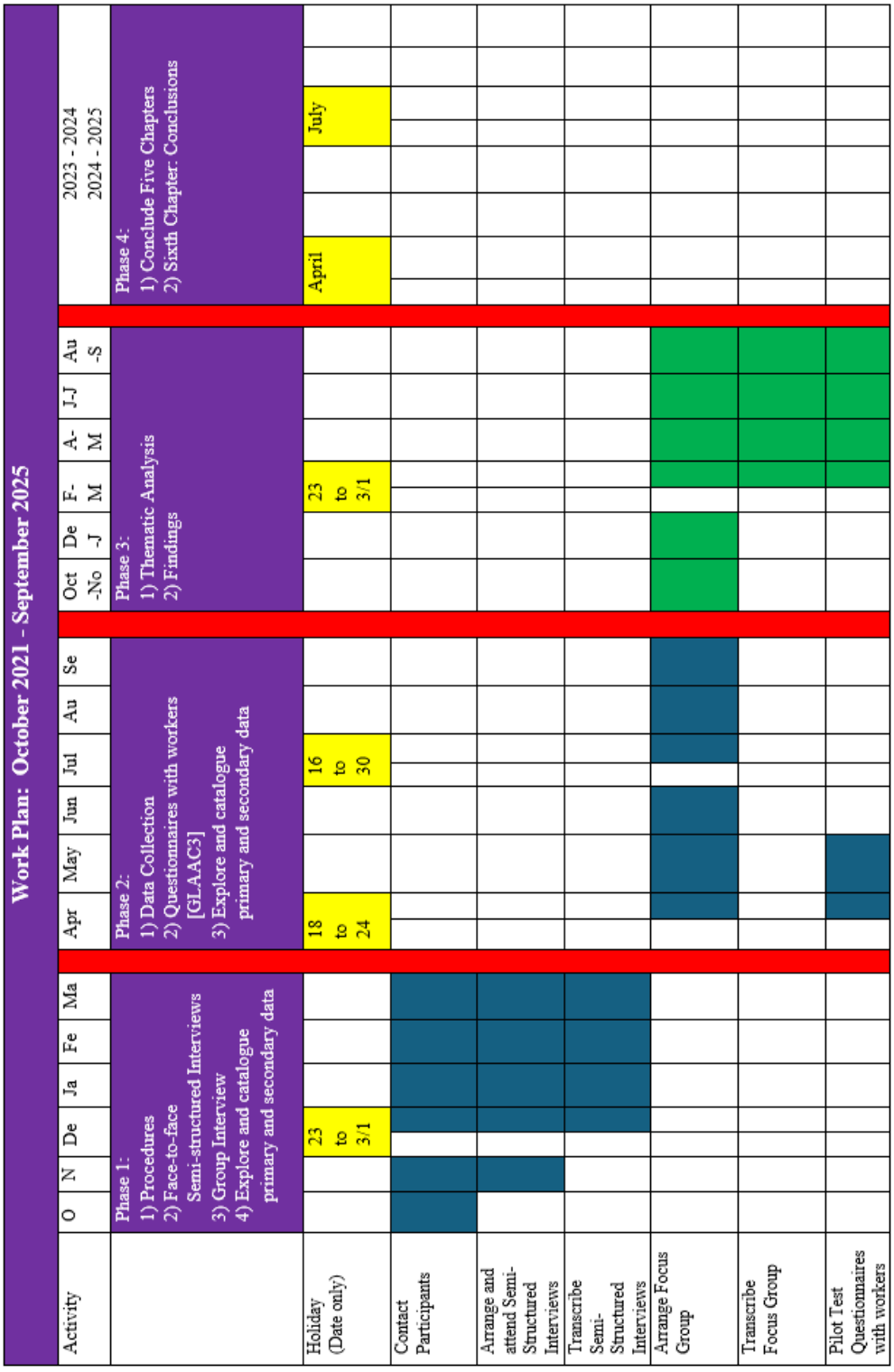
Gangmasters & Labour Abuse Authority. (2023, November 15). *Minutes - 85th GLAA Board Meeting.* https://www.gla.gov.uk/who-we-are/the-glaa-board/board-minutes-and-papers-2023/minutes-85th-glaa-board-meeting

Gangmasters & Labour Abuse Authority. (2024a). *GLAA Board Members*. https://www.gla.gov.uk/who-we-are/glaa-board-members/

Appendix 3.1: Work Plan of Stages and Tasks of the Research Topic:
The Gangmasters & Labour Abuse Authority and Precarious Workers In The UK

Key:

2021-2022 2022-2025



[GLAAC3]
Administer Questionnaires to workers [GLAAC3]
Transcribe Questionnaires/ organise Data
Thematic Analysis
Integrate and Cross Validate all data
Draft Findings and Discussion
Case Study GLAA: Read Literature
Catalogue any current Literature
Read GLAA News and Updates
Catalogue any current GLAA and explore ONS data, News and Updates
Read general News

	Catalogue any current general News										
	Read any current Government Legislation										
	Catalogue any current Government Legislation										
	Update Critical Literature Review										
	Update Prof Peter Prowse and Dr Jereme Snook										
	Finalise Findings Chapter										
	Update all Chapters										
	Complete all Chapters										
	Write first Draft										
	Read and check first draft										

Appendix 3.2:
Mixed Methods Research Design of the Research Topic:
The Gangmasters & Labour Abuse Authority and Precarious Work In The UK

Research Objectives	Participants and Respondents: Up to 15 Participants Up to 30 Respondents	Supporting Sources	Phase 1: Data Collection 1) Face-to-face Semi-Structured Interviews 2) Group Interview 3) Explore and catalogue primary and secondary data	Phase 2: Data Collection 1)Questionnaires with the precariat 2) Explore and catalogue primary and secondary data	Phase 3: Analysis
1. To investigate the GLAA history, statutory and functional role to regulate labour to the service sectors within its remit in the UK.	1 or 2 IASC (Past/present)	Independent Anti-Slavery Commissioner. (2019). *Independent Anti-Slavery Commissioner Strategic Plan 2019-2021 (Presented to Parliament pursuant to Section 42 (10) (a) of the Modern Slavery Act 2015.* [redacted] Independent Anti-Slavery Commissioner. (2021.1). *Independent Anti-Slavery Commissioner Annual Report 2020-2021 (Presented to Parliament pursuant to Section 42 (10) (b) of the Modern Slavery Act 2015).* [redacted] Independent Anti-Slavery Commissioner. (2021). *Contact Us.* [redacted]	Emailed past IASC, no response. No ISAC employed in position		Qualitative analysis of primary interview data Qualitative analysis of secondary published data Integrating and cross-validating data Triangulation of data Thematic analysis

	1 or 2 DLME (Past/present)		Emailed current DLME directly, followed by: Semi-Structured Interview via Microsoft Teams		
	6 x GLAA Board Members	Gangmasters & Labour Abuse Authority. (2021). *Academic Research Requests.* [redacted]	Emailed directly, Semi-Structured Interviews or Group Interview. Unable to assist with Interviews or a Group Interview	Emailed FoI requests and received some responses.	
	1 x Executive Team member of the REC	Recruitment & Employment Confederation. (2021). *Our spokespeople.* [redacted]	Emailed directly, followed by: Semi-Structured Interview via Zoom		
	1 x Executive Team member of the ALP	Association of Labour Providers. (2021). *Contact us*. [redacted]	Emailed a University Professor. Snowball Sampling led to: Semi-Structured Interview via Zoom		
	Two x ex-Employees of the GLAA		Emailed a University Lecturer. Snowball Sampling led to: Group Interview of three via Zoom		

	1 x Professor of Practise from The Rights Lab at the University of Nottingham	University of Nottingham. (2024). *The Rights Lab.* [redacted]	Emailed the University of Nottingham directly. Snowball Sampling led to: Semi-Structured Interview via Zoom		
			Explore and catalogue archival published secondary data from the Government, HO, DEFRA, GLA and GLAA available in the public domain	Explore and catalogue archival published secondary data from the Government, HO, DEFRA, GLA and GLAA available in the public domain	
2. Critically explore the GLAA governance, evaluating its contribution and role to protect workers in the UK which includes the exploration of GLAA board members, stakeholders and their roles which are regulated by law.	1 x IASC	Independent Anti-Slavery Commissioner. (2019). *Independent Anti-Slavery Commissioner Strategic Plan 2019-2021 (Presented to Parliament pursuant to Section 42 (10) (a) of the Modern Slavery Act 2015.* [redacted] Independent Anti-Slavery Commissioner. (2021.1). *Independent Anti-Slavery Commissioner Annual Report 2020-2021 (Presented to Parliament pursuant to Section 42 (10) (b) of the Modern Slavery Act 2015).*			Qualitative analysis of primary interview data Qualitative analysis of secondary published data Integrating and cross-validating data Triangulation of data Thematic analysis

	Independent Anti-Slavery Commissioner. (2021). *Contact Us.*					
1 x DLME (Past/present)						
GLAA Board Members	Gangmasters & Labour Abuse Authority. (2021). *Academic Research Requests.*					
1 x Executive Team member of the REC	Recruitment & Employment Confederation. (2021). Our spokespeople.					
1 x Executive Team member of the ALP Ltd	Association of Labour Providers. (2021). *Contact us.*			Examine and catalogue archival published secondary data from the HO, the Government and DEFRA, GLA and GLAA, ISAC and DLME.	Examine and catalogue archival published secondary data from the HO, the Government and DEFRA, GLA and GLAA, ISAC and DLME.	

	Two x ex-Employees of the GLAA				
	Professor of Practise in The Rights Lab at the University of Nottingham				
3. An examination of data and collection techniques at the Office for National Statistics (ONS) will establish if workers on a Contract for Service (CFS) are provided with a full range of coverage in their data which is essential for government, treasury, finance, economic and social policy making.	ONS Manager with responsibilities for statistical data including EMP17: People in employment on zero hours contracts	Office for National Statistics. (2021). *General and statistical enquires.*	Emailed directly for a Semi-Structured Interview: ONS were unable to assist with an interview. Emailed questions and received some emailed responses. Exploration of primary data from the ONS and global statistical data sets	Exploration of primary data from ONS and global statistical data sets	Quantitative analysis of primary data from the ONS EMP17 statistics and emails Integrating and cross-validating data Triangulation of data Thematic analysis

Appendix 3.3: Participant Information Sheet and Consent Form

Sheffield Hallam University

PARTICIPANT INFORMATION SHEET

Dear

Firstly, allow me to introduce myself. My name is Caroline Hewitt, and I am a DBA student at the Sheffield Business School, Sheffield Hallam University.

I am carrying out research into The Gangmasters & Labour Abuse Authority and Precarious Workers In The UK. I am inviting several GLAA stakeholders to take part in my study to assist me with a critical exploration of the regulatory environment for peripheral workers in the UK.

Would you please take part in my study? The GLAA has never been the focus of any research, therefore findings from my research will benefit the workers, yourself, other stakeholders, and other law enforcement agencies involved in the prevention of worker exploitation in the UK.

Should you decide to take part, I would like to carry out a semi-structured interview with you. I am happy to carry out a Zoom meeting with a time of your choice with you, or visit you at your office or another agreed location and time of your choice.

This Participation Information Sheet provides you with a procedural outline of the processes. A Consent Form is attached that would require us both to sign.

Prior to meeting you I would email/post you a list of themes for discussion to enable you to prepare for our meeting.

All interviews will be audio-recorded with handwritten notes taken. Please note however, that should you choose not to be audio-recorded, then that is fine, and I will simply take handwritten notes of the meeting.

An initial meeting would take approximately an hour. I would then transcribe our meeting and I am more than happy to send you a copy of this. I may ask you for a second or third meeting to follow up any new information and of course this would be entirely up to you, should you wish to meet with me again. Please note that once again, I am more than happy to provide you with a further copy of any transcripts.

The study is likely to last for a couple of years and should arrangements be made for presentations to be given regarding my topic, then please be assured you will be sent an invitation to attend. When the study is completed, you will be provided with a full copy of the results in a copy of the completed thesis. You would be further advised of any publications.

It is up to you to decide if you want to take part. A copy of the information provided here is yours to keep, along with the Consent Form if you do decide to take part. You can also decide to withdraw at any time during the process, without giving a reason, or you can decide to not answer a particular question.

There are no risks to yourself taking part in this research as all information is treated confidentially and anonymised. The Sheffield Hallam University undertakes research as part of its function for the community under its legal status. Data protection allows us to use personal data for research with appropriate safeguards in place under the legal basis of **public tasks that are in the public interest.**

A full statement of your rights can be found at:

However, all Sheffield Hallam University research is reviewed to ensure that participants are treated appropriately, and their rights respected. This study was approved by UREC with Converis number .

Further information can be found at:

Should any form of deception be in the study for example, in terms of withholding information or supplying some degree of misinformation, then I will alert you and all participants alongside an opportunity to discuss your participation.

You will be provided with details of my coding system that will protect your identity assuring you that no-one will be able to connect you to what has been recorded and reported.

On completion of my study, all information will be stored and formalised in a data management plan, including anonymised paper-based interviews and questionnaires by labelling all data and storing securely in a restricted safe place. Anonymised data on computer hard drives or USB's will be stored securely with password protection and firewall/network protection software and backed up as per the UK Data Archive 2011.

The Sheffield Hallam University takes a robust approach to protecting the information it holds with dedicated storage areas for research data with controlled access. If you are participating in a particularly sensitive project the Sheffield Hallam University puts into place additional layers of security.

The University has Cyber Essentials certification.

Alongside these technical measures there are comprehensive and effective policies and processes in place to ensure that users and administrators of the Sheffield Hallam University information are aware of their obligations and responsibilities for the data they have access to. By default, people are only granted access to the information they require to perform their duties. Training is provided to new staff joining the Sheffield Hallam University and existing staff have training and expert advice available if needed.

Your information will not be kept for longer than is necessary and is usually kept in an anonymised format. The length of time for which we keep your data is dependent on several factors including the importance of the data, the funding requirements, the nature of the study, and the requirements of the publisher. After anonymisation your data will be stored in the Sheffield Hallam University Research Data Archive where it may be accessed by other researchers with permission from the Sheffield Hallam University.

Data in the Sheffield Hallam University Research Data Archive will be retained and then deleted in accordance with university rules at the time.

Should you wish to ask any further questions or seek clarification of my research then please feel free to contact either myself or supervisors as below:
Researcher: Caroline Hewitt
Supervisors: Professor Peter Prowse
Dr Jereme Snook

Should you wish to express any concerns about how your data is stored, or if adverse effects occur after the study are given below, then please contact: The Data Protection Officer via email on about:

- how your data is used by the Sheffield Hallam University,
- you would like to report a data security breach (e.g., if you think your personal data has been lost or disclosed inappropriately)
- you would like to complain about how the Sheffield Hallam University has used your personal data.

If you have concerns with how the research was undertaken or how you were treated, please contact the Head of Research Ethics as below:
Email:
Postal address: Sheffield Hallam University, Howard Street, Sheffield S1 1WBT
Contact Telephone Number: 0114 2255555

May I take this opportunity of thanking you for reading all the above.

Should you wish to discuss anything further regarding my topic or anything in this Participation Information Sheet, then please feel free to contact me or my supervisors on the emails above.

I hope you can join me in researching the GLAA and workers in its remit, as I feel sure working together in this way will help assist with the prevention of worker exploitation in the UK.

I look forward to hearing from you in due course.

With kind regards

Caroline Hewitt
DBA Student
Sheffield Business School
Sheffield Hallam University

Sheffield Hallam University

PARTICIPANT CONSENT FORM

The Gangmasters & Labour Abuse Authority and Precarious Workers In The UK

Please answer the following questions by placing a Tick in the box that applies	Yes	No
I have read the Participant Information Sheet for this study and have had details of the study explained to me		
My questions about the study have been answered to my satisfaction and I understand that I may ask further questions at any point		
I understand that I am free to withdraw from the study within the time limits outlined in the Participant Information Sheet, without giving a reason for my withdrawal or to decline to answer any particular questions in the study without any consequences to my future treatment by the researcher.		
I agree to provide information to the researcher under the conditions of confidentiality set out in the Participant Information Sheet.		
I wish to participate in the study under the conditions set out in the Participant Information Sheet.		
I consent to the information collected for the purposes of this research study, once anonymised (so that I cannot be identified), to be used for any other research purposes.		

Participant's Signature: _____ Date:_____

Participant's Name (Printed): _____

Contact details: _____

_____

Researcher's Signature:

Researcher's Name (Printed): Caroline Hewitt

Researcher's contact details: Caroline Hewitt
DBA Student, Business and Management, Sheffield Business School, Sheffield Hallam University.
Mob:

Please keep your copy of the:
Participant Consent Form and the Participant Information Sheet together

Appendix 3.4: Questionnaire for Worker (English)

Workers in the remit of the Gangmasters & Labour Abuse Authority

Introduction to Face-to-Face Questionnaires, for completion in safe open spaces:

Hello. My name is Caroline Hewitt and I am carrying out a survey at the Sheffield Hallam University about workers in the food manufacturing, food processing and agriculture industries.

I am carrying out this survey to help workers receive better work contracts, better working hours and better pay.

This questionnaire will take around 5-10 minutes to complete and is completely anonymous.

Would you please take part in my survey by putting a cross in the boxes of the answers like this [X] Please feel free to write answers on the dotted lines below:……

Your decision to take part is entirely voluntary. I can help you if you wish?

Your help is greatly appreciated, and I personally thank you for your time and efforts.

Thank you.

Introduction to Questionnaires, for completion in an office or administrative building:

This is a questionnaire survey that is being carried out by Caroline Hewitt at the Sheffield Hallam University who is researching workers in the food manufacturing, food processing and agriculture industries.

This survey is being carried out to help workers receive better work contracts, better working hours and better pay.

This questionnaire will take around 5-10 minutes to complete and is completely anonymous.

Would you please take part in my survey by putting a cross in the boxes of the answers like this [X] Please feel free to write answers on the dotted lines below:……

I hope you enjoy filling in this questionnaire.

Your decision to take part is entirely voluntary. Your help is greatly appreciated and I personally thank you for your efforts and time.

Thank you.

Question	Answer	Please put a cross (X) in the boxes below	
How did you travel to the UK?	Recruitment agency transport:	Plane	
		Bus	
		Car	
	Friends or family transport		
	Own transport		
	Other (Please specify)……... ……..		
Did you pay for your transport into the UK?	Yes		
	No		
	How much did you pay?		
Why did you come to the UK?	Job Offer in the EU from a recruitment agency		
	Job Offer in the UK from a recruitment agency		
	Came with family		
	Came of their own accord		
	Other (Please specify) …… ……		
From arriving in the UK, how many jobs have you had?	One Job		
	Two Jobs		
	Three Jobs		
	Four Jobs		
	More than Four Jobs Explain a little …….. ……...		
Where do you work?	Food factory		
	Warehouse		
	Agriculture		
	Other (Please specify) ……. ……..		
How do you sign into the factory or work area?	Clock in and out		
	Sign papers in and out		
	Scan in and out		
	Other (Please specify) …….		

	Explain a little …… ……..		
What is the name of the Recruitment Agency that you work for?	Staffline Recruitment		
	Cordant/PMP Recruitment		
	Mach Recruitment		
	Blue Arrow Recruitment		
	Other (Please specify)…… ……..…….		
What sort of work contract have you signed with your recruitment agency?	Zero Hours Contract		
	Contract for Service		
	Self Employed		
	Contract of Employment		
	Other (Please specify) …….. …….. ……..		
Have you ever received any training in your work place and who trained you?	Training by the recruitment agency		
	Training by the factory staff		
	Training by a separate training organisation		
	Never received any training		
	Don't know		
How do you receive your payslip?	By Email		
	By Post		
	By Hand		
Do you have to pay for anything at the end of the week that is deducted from your weekly pay? If so, how much do you pay and what do you pay for?	Travel to and from work and between jobs or factories	Yes	£……
		No	
	Accommodation	Yes	£……
		No	
	Insurance	Yes	£……

		No	
	Benefit Cards	Yes	£……
		No	
	Other (Please specify) ……..… Explain a little……... ……..		£……
What are the most common work problems you experience? Tick as many as you like	Not paid the hourly pay rate		
	Not paid Holiday Pay		
	No regular work hours		
	Other (Please specify) …….. ……..... ……..		
How many hours do you work?	Up to 10 hours per week		
	10 - 20 hours per week		
	20 - 30 hours per week		
	30 – 40 hours per week		
	More than 40 hours per week		
Do you have any rest breaks at work?	Yes		
	No How long are they? ……...…….. ……..		
If you have problems at work, who do you approach to assist you with your work problems?	Support Charity		
	Recruitment Agency		
	No-one		
	Other (Please specify) …….. ……...		
During the coronavirus pandemic, please tick the box if you	Health and Safety advice		
	Personal Protective Equipment		
	Statutory Sick Pay		

received any of the following?	Other (Please specify)…….. ……..	
Have you heard of The Gangmasters & Labour Abuse Authority?	Yes	
	No	
Are you in a UK Trade Union that can help you in confidence with problems at work?	Yes	
	No	
Would you like to join a UK trade union, to assist you with issues at work?	Yes	
	No	
Is there anything I can help you with? Is there anything you would like to share with me? …… ……		

Thank you for taking the time to complete this Questionnaire.

Appendix 3.5: Questionnaire for Worker (Polish)

Pracownicy w kompetencjach Gangmasters & Labour Abuse Authority

Wprowadzenie do kwestionariuszy twarzą w twarz, do wypełnienia w bezpiecznych otwartych przestrzeniach:

Witam. Nazywam się Caroline Hewitt i przeprowadzam ankietę na Uniwersytecie Sheffield Hallam na temat pracowników w przemyśle spożywczym, przetwórstwie spożywczym i rolnictwie.

Przeprowadzam tę ankietę, aby pomóc pracownikom w uzyskaniu lepszych umów o pracę, lepszych godzin pracy i lepszych płac.

Wypełnienie kwestionariusza zajmie około 5-10 minut i jest całkowicie anonimowe.

Czy mógłbyś wziąć udział w mojej ankiecie, stawiając krzyżyk w polach odpowiedzi w ten sposób: [X]

Would you please take part in my survey by putting a cross in the boxes of the answers like this [X] Prosimy o pisanie odpowiedzi na przerywanych liniach poniżej

Twoja decyzja o udziale jest całkowicie dobrowolna.

Twoja pomoc jest cenna i osobiście dziękuję za poświęcony czas i wysiłek.

Dziękuję.

Wprowadzenie do kwestionariuszy, do wypełnienia w biurze lub budynku administracyjnym:

Jest to ankieta przeprowadzana przez Caroline Hewitt z Sheffield Hallam University, która bada pracowników w przemyśle spożywczym, przetwórstwie spożywczym i rolnictwie. Badanie to jest przeprowadzane, aby pomóc pracownikom w uzyskaniu lepszych umów o pracę, lepszych godzin pracy i lepszych płac.

Wypełnienie kwestionariusza zajmie około 5-10 minut i jest całkowicie anonimowe. Czy mógłbyś wziąć udział w mojej ankiecie, stawiając krzyżyk w polach odpowiedzi w ten sposób: [X]

Prosimy o pisanie odpowiedzi na przerywanych liniach poniżej …….

Mam nadzieję, że spodoba Ci się wypełnienie tego kwestionariusza.

Twoja decyzja o udziale jest całkowicie dobrowolna. Wasza pomoc jest bardzo doceniana i osobiście dziękuję za wasze wysiłki i czas.

Dziękuję.

Pytanie	Odpowiedź	Proszę umieścić krzyżyk (X) w polach poniżej
Jak podróżowałeś do Wielkiej Brytanii?	Pośrednictwo pracy w transporcie agencyjnym:	Samolot 'płaszczyzn
		Autobus
		Samochód
	Transport przyjaciół lub rodziny	
	Własny transport	
	Inne (proszę określić).....…… …	
Czy zapłaciłeś za transport do Wielkiej Brytanii?	Tak	
	Nie	
	Ile zapłaciłeś?	
Dlaczego przyjechałeś do Wielkiej Brytanii?	Oferta pracy w UE od agencji pośrednictwa pracy	
	Oferta pracy w UK od agencji pośrednictwa pracy	
	Przyjechałem z rodziną	
	Przyjechałem z własnej woli	
	Inne proszę określić)…….. ……	
Od przyjazdu do Wielkiej Brytanii, ile miałeś miejsc pracy?	Jedno miejsce pracy	
	Dwa miejsca pracy	
	Trzy miejsca pracy	
	Cztery miejsca pracy	
	Więcej niż cztery miejsca pracy Wyjaśnij trochę …….. ……...	
Gdzie pracujesz?	Fabryka żywności	
	Magazyn	
	Rolnictwo	
	Inne (proszę określić)……. ……	
	Poprzez odbijanie zegara wejścia i wyjścia	

Jak ewidencjonowano Twój czas pracy w fabryce lub na stanowisku pracy?	Poprzez podpisywanie list wejścia i wyjścia		
	Poprzez skanowanie czasu wejścia i wyjścia		
	Inne (proszę określić)……. ……. Wyjaśnij trochę ……..……		
Jak nazywa się Agencja Pośrednictwa Pracy, w której pracujesz?	Staffline Recruitment		
	Cordant/PMP Recruitment		
	Mach Recruitment		
	Blue Arrow Recruitment		
	Inne (proszę określić).....……..……		
Jaką umowę o pracę podpisałeś ze swoją agencją rekrutacyjną?	Umowa zero godzin		
	Umowa o świadczenie usług		
	Samozatrudnionienie		
	umowa o pracę		
	Inne (proszę określić)…….. ……..		
Czy kiedykolwiek odbyłeś jakieś szkolenie w swoim miejscu pracy i kto Cię przeszkolił?	Szkolenie przez agencję rekrutacyjną		
	Szkolenie przez pracowników fabryki		
	Szkolenie prowadzone przez oddzielną organizację szkoleniową		
	Nigdy nie odbyłem żadnego szkolenia		
	Nie wiem		
Jak otrzymywałeś odcinek wypłaty?	Przez e-mail		
	Pocztą		
	Do ręki		
Czy na koniec tygodnia musisz płacić za coś, co jest potrącane z tygodniowej wypłaty?	Podróże do i z pracy oraz między miejscami pracy lub fabrykami	Tak	£…… …
		Nie	
	Zakwaterowanie	Tak	

Jeśli tak, to ile płacisz i za co płacisz?		Nie	£…… …
	Ubezpieczenie	Tak	£…… …
		Nie	
	Karty Benefit	Tak	£…… …
		Nie	
	Inne (proszę określić)……..… Wyjaśnij trochę ……...		£…… …
Jakie są najczęstsze problemy w pracy, których doświadczasz? Zaznacz tyle, ile chcesz	Nie zapłacono stawki godzinowej		
	Niewypłacone wynagrodzenie urlopowe		
	Brak regularnych godzin pracy		
	Inne (proszę określić)…….. ……..... ……..		
Ile godzin pracujesz?	Do 10 godzin tygodniowo		
	10 - 20 godzin tygodniowo		
	20 - 30 godzin tygodniowo		
	30 – 40 godzin tygodniowo		
	Ponad 40 godzin tygodniowo		
Czy masz jakieś przerwy na odpoczynek w pracy?	Tak		
	Nie Jak długo trwają?……...……. ……..		
Jeśli masz problemy w pracy, do kogo zwracasz się, aby pomóc Ci w problemach z pracą?	Organizacja charytatywną		
	Agencja Pośrednictwa Pracy		
	Nikt		
	Inne (proszę określić)…….. ……...		
	Porady dotyczące zdrowia i bezpieczeństwa		

Czy podczas pandemii koronawirusa otrzymałeś wymienione obok wsparcie? Zaznacz.	Środki ochrony osobistej	
	Ustawowy zasiłek chorobowy	
	Inne (proszę określić).....……	
Czy słyszałeś o Gangmasters & Labour Abuse Authority?	Tak	
	Nie	
Czy należysz do brytyjskiego związku zawodowego, który może pomóc Ci w rozwiązaniu problemów w pracy?	Tak	
	Nie	
Czy chciałbyś dołączyć do brytyjskiego związku zawodowego, aby pomóc Ci w sprawach w pracy?	Tak	
	Nie	
Czy jest coś, w czym mogę ci pomóc? Czy jest coś, czym chciałbyś się ze mną podzielić? ..... ……		

Dziękuję za poświęcenie czasu na wypełnienie tego kwestionariusza.

Appendix 3.6: Interview Guide.
Professor of Practice at The Rights Lab at the University of Nottingham

Sheffield Hallam University

Professor of Practice at the Rights Lab at the University of Nottingham✔

Email list of themes✔
Consent form✔
Introductions ✔
Record✔
Transcribe and email a copy✔

FYI: or this research all recruitment agencies, businesses, employment agencies or businesses managed service providers, operators, labour providers are split simply into 2 groups: licensed or unlicensed gangmasters.

1) How has the Immigration Act 2016 benefitted food workers in the remit of the GLAA?

2) Have you any idea how many EU workers licensed or unlicensed gangmasters have been transported from the EU into the UK?
   a) In the last 5 years ……
   b) In the last 10 years ……
   c) In the last 15 years ……

3) What sort of transport did or do they offer workers to travel to the UK?
   a) Plane b) Bus c) Car d) Other

4) Could you tell me how many agency workers have received public funding in the form apprenticeship training in the licensed gangmaster sector and how many have moved onto a CoE?
   a) In the last 5 years
   b) In the last 10 years
   c) In the last 15 years

5) Who provides the training to the agency workers?
   a) Training by the recruitment agency
   b) Training by the recruitment agencies training organisation?
   c) Training by the factory staff
   d) Training by a private enterprise
   e) Government entity
   f) Training by a union
   g) Never received any training
   h) No training
   i) All of the above

6) Investigations into fraud and government service suppliers in 2012 highlighted large amounts of public money were spent on apprenticeship training with service suppliers including A4e in the GLAA sector.
   a) As a former board member, what conclusions did the GLA conclude to the government investigations, as minutes of meetings in 2012 indicate GLA board members were involved?
   b) How many other apprenticeship training suppliers were investigated?
   c) How many licensed gangmasters were investigated?
   d) The apprenticeships training funds were for long-term jobs, not short-term agency workers. Was the difference investigated?
   e) Is there anything else you would like to add?

7) Who monitors the licensed gangmaster accommodation offset claims? Explore.

8) In the gangmaster industries, what is a Service Level Agreement and how does it operate between the food manufacturers and licensed gangmaster? Explore.

9) What does the GLAA REC Contract for Service Model consist of, or incorporate or look like that was created in 2010 with the GLA?

10) What sort of work contract do GLAA licensed and unlicensed gangmasters offer their workers?
    a) Contract in Service i.e., Contract of Employment
    b) Contract for Service i.e., Zero Hour Contract
    c) Other

11) Workers are referred to as employees at the GLAA when none of them are employed. They are workers on a CFS which is a ZHC i.e. in a non-standard form of employment and that's using ILO terms.
    The GLA and GLAA have for years provided advice to the gangmaster sectors for deductions or payments from worker wages for benefit cards, accommodation, transport, insurance. Workers may work 15 hrs one week, 40 the next, 10 the next, 35 the next, 18 the next.
    If payments are made from their weekly wage of 15 hrs or 10 hrs they may only earn 4-5 hrs pay and they may not be entitled to Universal Credit. Why is this allowed, encouraged and why isn't there a cut off point?

12) Has GLAA Charge rate guidance been checked with HMRC?

    I have tried to locate the DEFRA 2003 analysis where it says on page 1 "DEFRA states" …… It doesn't seem to exist? Can you help me with that please?

13) Does the GLAA provide numbers of workers on a CFS which is a ZHC to the ONS as all worker and employee numbers help design policy in the UK?
    The LFS indicates around 1m workers.

However, the GLA and GLAA provides a platform for the gangmaster industries with workers on a CFS/ZHC. I would suggest millions of workers are working from a CFS which is a ZHC of possibly 6 – 10 m.
Do you have any comments with regard to this?

14) The GLA and GLAA's secretariat and governance have made employment decisions for workers i.e. status, payments from wages etc
    a) Have decisions made, benefitted the flexible workforce?
    b) Have they affected the UK workforce?

15) Similar to what has recently happened recently with the PO Ferries carry on, the GLA were informed in 2014 of British workers being replaced by EU workers in food manufacturing and food processing by licensed gangmasters, and in particular by GLA former board members.
    Could you advise me of what action was taken to stop those actions continuing and how such actions are monitored or managed now?

16) How did the GLAA ensure workers on a CFS/ZHC received adequate Personal Protective Equipment, Statutory Sick Pay and health and safety measures in the licensed gangmaster environment during the coronavirus pandemic?

17) The UK had the highest number of Covid cases in Europe.
    What advice if any, did the DLME provide the GLAA in response to the COVID-19 pandemic to ensure workers in their remit were safe in their workplace?

    Are you satisfied with the GLAA and Gold Command responses to protect workers in the GLAA remit?
    The Care Quality Commission took action to stop the spread of COVID-19 by agency workers moving from care home to care home.
    What action did the GLAA/Gold Command take to prevent or stop agency workers
    being moved from factory to factory, e.g., agency workers moving from the textile
    industry into car manufacturing into the care sector into their Youth Hostel Accommodation into meat processing into ready meals etc?

18) How did and does the GLAA balance the issue of local labour and gangmaster labour?

19) In your opinion, is there any possibility the GLA now GLAA has exasperated human trafficking in any way? Explore.

Appendix 3.7: Interview Guide.
Association of Labour Providers (ALP)

Sheffield Hallam University

Senior Member of the Association of Labour Providers✓
Email list of themes✓
Consent form✓
Introductions ✓
Record✓
Transcribe and email a copy✓

1) Has the ALP encouraged its members (licensed or unlicensed gangmasters) in the UK to recruit workers from gangmasters overseas?

2) Could you tell me how many EU workers via licensed or unlicensed gangmasters have been transported from the EU into the UK?
   d) In the last 5 years ……
   e) In the last 10 years ……
   f) In the last 15 years ……

3) What sort of transport do licensed and unlicensed gangmasters offer workers to travel into the UK?
   a) Plane b) Bus c) Car d) Other

4) Have you any idea what are the most common problems migrant workers ask their licensed gangmasters to resolve for them?
   Explore.

5) Are common problems then resolved in the long term at the GLAA?
   If so please provide an example.

6) There is a presumed shortage of labour, but gangmasters have received billions of funds for apprenticeship training. Could you tell me how many agency workers have received apprenticeship training in the licensed and unlicensed gangmaster sectors?
   d) In the last 5 years
   e) In the last 10 years
   f) In the last 15 years

7) Who provides the training to temporary agency workers? Tick any that apply
   j) Training by the recruitment agency
   k) Training by the recruitment agencies training organisation?
   l) Training by the factory staff
   m) Training by a private enterprise
   n) Government entity
   o) Training by a union
   p) No training

8) Prior to 2015, how was apprenticeship training monitored to ensure the workers moved into permanent employment, (when spent directly via licensed and unlicensed gangmasters on their agency workers)?

9) How many EU agency workers including British workers have received public funding in the form of apprenticeship training and then moved into a permanent job role in the last 10 years?

10) How responsive are the GLAA to address concerns you raise at meetings? Explore.

11) Who monitors the licensed gangmaster accommodation offset claims?

12) How do Service Level Agreements with the gangmaster industries benefit business instead of clients employing staff directly?

13) What sort of work contract do your members most commonly offer their workers?
    a) Contract in Service i.e., Contract of Employment
    b) Contract for Service i.e., Zero Hour Contract
    c) Other

14) What does the REC/ALP Contract for Service Model consist of that was created in 2010? Was direction to the model was gained from the LPC, unions, human resource and similar.
    Could you tell me a bit about the meetings held with DEFRA and the labour groups and how has the model faired since then, has it been altered, which sectors is it used in?

15) What are licensed or unlicensed gangmasters able to deduct from a worker's CFS weekly pay?
    a) Accommodation
    b) Insurance
    c) Benefit cards
    d) Transport
    e) Anything else

16) Workers on a 'Contract for Service'. Are deductions still taken from their weekly pay when the worker works for example, just 10 hours in a week?
    Is there a cutoff point?

17) ONS figures indicate just one million workers are on people?
    Can you put an estimation on numbers of workers recruited in the gangmaster sectors on a CFS/ZHC in the UK?

18) Literature indicates the REC and ALP contribute to the Low Pay Commission, which indirectly affects policy at the GLA/GLAA. However, the LPC does not contribute to the GLA/GLAA.
    Why do you think that is the case and have you made suggestions to the LPC to do so?

19) Covid-19: How did the REC/ALP ensure workers received adequate Personal Protective Equipment, Statutory Sick Pay and health and safety measures were in place in the workers environment?
20) My understanding is, is that the GLA was set up to license gangmasters to protect workers. However, the GLA/GLAA seems to provide a platform for licensed gangmasters with an REC/ALP Contract for Service Model created in 2010 that may not protect workers.
Any comments

21) Do you have any comments you would like to share about any of the issues we have discussed today?

Appendix 3.8: Interview Guide.
Two x former members of the Gangmasters & Labour Abuse Authority (GLAA)

Sheffield Hallam University

Agree as: "Former members of the GLAA" ✓
Two x Email list of themes ✓
Two x Consent forms ✓
Introductions ✓
Record ✓
Transcribe and email 2 x copies ✓

FYI: for this research all recruitment agencies, businesses, employment agencies or businesses managed service providers, operators, labour providers are split simply into 2 groups: licensed or unlicensed gangmasters.

1) Can you tell me why the GLA and now GLAA secretariat and governance rebrand licensed gangmasters to recruitment agencies, recruitment businesses, labour providers, employment businesses, managed service providers and operators?
   a) Why?
   b) Who has benefited?
   c) Who has not benefited?
   d) Is there anything else you would like to add?

2) What key factors do you think prevents British workers working in some GLAA sectors for example food manufacturing and food processing?

   Explore: Immigration and Social Security Co-ordination (EU Withdrawal) Bill: Agriculture House of Lords. (2020). Motion A1 (as an amendment to Motion A). Immigration and Social Security Co-ordination EU Withdrawal Bill. *November 9 Debate, (HL Deb c824).* https://www.theyworkforyou.com/lords/?id=2020-11-09a.822.0&s=Agriculture+Bill#g824.0

3) Have you any idea how many EU workers licensed or unlicensed gangmasters have been transported from the EU into the UK?
   g) In the last 5 years ……
   h) In the last 10 years ……
   i) In the last 15 years ……

4) What sort of transport did or do they offer workers to travel to the UK?
   b) Plane b) Bus c) Car d) Other

5) Could you tell me how many agency workers have received public funding in the form apprenticeship training in the licensed gangmaster sector and how many have moved onto a CoE?
   g) In the last 5 years
   h) In the last 10 years

i) In the last 15 years

6) Who provides the training to the agency workers?
   q) Training by the recruitment agency
   r) Training by the recruitment agencies training organisation?
   s) Training by the factory staff
   t) Training by a private enterprise
   u) Government entity
   v) Training by a union
   w) Never received any training
   x) No training
   y) All of the above

7) Investigations into fraud and government service suppliers in 2012 highlighted large amounts of public money were spent on apprenticeship training with service suppliers including A4e in the GLAA sector.
   f) As a former board member, what conclusions did the GLA conclude to the government investigations, as minutes of meetings in 2012 indicate GLA board members were involved?
   g) How many other apprenticeship training suppliers were investigated?
   h) How many licensed gangmasters were investigated?
   i) The apprenticeships training funds were for long-term jobs, not short-term agency workers. Was the difference investigated?
   j) Is there anything else you would like to add?

8) In the gangmaster industries, what is a Service Level Agreement and how does it operate between the food manufacturers and licensed gangmaster?
   Explore.

9) What is a licensed gangmaster GLA REC business model that was created in 2010?
   Explore with:
   a) What does the model look like?
   b) Do they have a picture of one?
   c) Can they draw the model? If not, what does the model incorporate?
   d) What can a gangmaster charge for and/or legally deduct from workers' wages?

10) The GLAA website has a number of documents between April and October 2010 not available for observation. Do you have a copy at all and if so, please may I have a copy of the information?

11) What sort of work contract do GLAA licensed and unlicensed gangmasters offer their workers?
   a) Contract in Service i.e., Contract of Employment
   b) Contract for Service i.e., Zero Hour Contract
   c) Other

12) Is the GLAA Business Model used in other manufacturing sectors for example the
   textile industry?

Explore e.g., Boohoo in Leicester

13) How does the GLAA monitor the Agency Working Regulations within the GLAA business model if at all?

14) How does the GLAA ensure workers are paid for travelling to, from and between work assignments?

15) Workers are referred to as employees at the GLAA when none of them are employed. They are workers on a CFS which is a ZHC i.e. in a non-standard form of employment and that's using ILO terms.
The GLA and GLAA have for years provided advice to the gangmaster sectors for deductions or payments from worker wages for benefit cards, accommodation, transport, insurance. Workers may work 15 hrs one week, 40 the next, 10 the next, 35 the next, 18 the next.
If payments are made from their weekly wage of 15 hrs or 10 hrs they may only earn 4-5 hrs pay and they may not be entitled to Universal Credit.
Why is this allowed, encouraged and why isn't there a cut off point?

16) Does the GLAA provide numbers of workers on a CFS which is a ZHC to the ONS as all worker and employee numbers help design policy in the UK?
The LFS indicates around 1m workers.
However, the GLA and GLAA provides a platform for the gangmaster industries with workers on a CFS/ZHC. I would suggest millions of workers are working from a CFS which is a ZHC of possibly 6 – 10 m.
Do you have any comments with regard to this?

17) Workers in the GLAA remit do not pay for their accommodation directly. Do you personally agree they should pay for their own accommodation?
    a) Yes
    b) No. Explore.

18) Have you any idea how much in public funds has been spent on worker accommodation in the GLAA sectors in the last year, 2 years, five years?

19) Who monitors the licensed gangmaster accommodation offset claims?
Explore.

20) Do you know if GLAA Charge rate guidance had been checked with HMRC?

I have tried to locate the DEFRA 2003 analysis where it says on page 1 "DEFRA states" …… it doesn't seem to exist?
Can you help me with that please, has it ever been queried?

21) Like what has recently happened recently with the PO Ferries carry on, the GLA were informed in 2014 of British workers being replaced by EU workers in food manufacturing and food processing by licensed gangmasters, and in particular by GLA former board members.
Could you advise me of what action was taken to stop those actions continuing and how such actions are monitored or managed now?

22) Do you know how the GLAA ensured workers on a CFS/ZHC received adequate Personal Protective Equipment, Statutory Sick Pay and health and safety measures in the licensed gangmaster environment during the coronavirus pandemic?

23) The UK had the highest number of Covid-19 cases in Europe.
What advice if any, did the DLME provide the GLAA in response to the Covid-19 pandemic to ensure workers in their remit were safe in their workplace?

Are you satisfied with the GLAA and Gold Command responses to protect workers in the GLAA remit?
The Care Quality Commission took action to stop the spread of Covid-19 by agency workers moving from care home to care home.
What action did the GLAA/Gold Command take to prevent or stop agency workers
being moved from factory to factory, e.g., agency workers moving from the textile
industry into car manufacturing into the care sector into their Youth Hostel Accommodation into meat processing into ready meals etc?

24) The GLAA relaxed barriers to gangmaster licensing during the Covid-19 pandemic and a risk-based approach was taken.
Explore with:
   a) In this context, what does a risk-based approach mean?
   b) Why did the Association of Labour Providers not require a license for their Spare Worker Availability Portal and Essential Workers Needed Portals?

25) How did and does the GLAA balance the issue of local labour and gangmaster labour?

26) In your opinion, is there any possibility the GLA now GLAA has exasperated human trafficking in any way? Explore.
27) Do GLAA officials and LPC officials have a dialogue and share information?
28) How has The Modern Slavery Act 2015 benefitted workers in the remit of the GLAA?
Explore

29) How has the Immigration Act 2016 benefitted workers in the remit of the GLAA?
Explore

30) The GLA and GLAA's secretariat and governance have made employment decisions for workers.
   c) Have decisions made, benefitted the flexible workforce?
   d) Have they benefited the UK workforce?
   e) If so, how?
   f) If not, how not?
   g) Was anyone in an industrial relations/human resource capacity involved in the process/choices made?
   h) Were unions involved in any policy consultation to provide their understandings of whether their decisions/choices made would benefit the workers?

i) Can you think of anything else you would like to add?

31) The Red Tape Challenge in 2011 may not have invited unions to comment. How did the GLAA?
   a) Contact unions for their understandings of what was happening or potentially could happen?
   b) Did they seek advice from people in an industrial relations/human resource capacity for guidance?
   c) Did they provide an argument to government, and if so, What, Who, How and Why?
   d) Would you like to add anything else to your comments?

32) The GLAA provides guidance to licensed gangmasters but limited guidance to workers for example holiday pay (although there is evidence to suggest the education sector with workers on a CFS receive their holiday pay).
   a) Why are food workers treated differently to the education sector?
   b) What guidance if any is provided to workers regarding holiday pay?
   c) Why is there no clear GLAA brief?

33) Why was Brief 42 regarding P45's cancelled/removed?

34) Do you have any idea of how many workers are in the sectors in the GLAA remit?
   a) How many GLAA workers are in the food manufacturing industries?
   b) How many GLAA workers are in the food processing industries?
   c) How many GLAA workers are in the food packing industries?
   d) How many GLAA workers are in the horticulture industry?
   e) How many GLAA workers are in the agriculture industry?
   f) How many GLAA workers are in the shellfish industry?
   g) How many GLAA workers are in the textile industry?

35) The Gangmasters (Licensing) Act 2004 has evolved. Its original intention was to protect exploited workers in the UK."
   a) In your opinion, does the GLAA carry out the GLA's its original legislative duty or something else?
   b) If something else, what is that?

36) Would you agree that food workers in the GLA/GLAA remit are suppressed by the vulnerabilities of people with poor work experiences?

37) Would you agree food workers in the licensed gangmaster sectors should have their own representation from unions and HR (like yourselves and other workers in society)?

Appendix 3.9: Interview Guide.
Director of Labour Market Enforcement (DLME)

Sheffield Hallam University

Director of Labour Market Enforcement✔
Email list of themes✔
Consent form✔
Introductions ✔
Record✔
Transcribe and email a copy✔

FYI: or this research all recruitment agencies, businesses, employment agencies or businesses managed service providers, operators, labour providers are split simply into 2 groups: licensed or unlicensed gangmasters.

1) How has the Immigration Act 2016 benefitted food workers in the remit of the GLAA?

2) Have you any idea how many EU workers licensed or unlicensed gangmasters have been transported from the EU into the UK?
   j) In the last 5 years ……
   k) In the last 10 years ……
   l) In the last 15 years ……

3) What sort of transport did or do they offer workers to travel to the UK?
   c) Plane b) Bus c) Car d) Other

4) Could you tell me how many agency workers have received public funding in the form apprenticeship training in the licensed gangmaster sector and how many have moved onto a CoE?
   j) In the last 5 years
   k) In the last 10 years
   l) In the last 15 years

5) Who provides the training to the agency workers?
   a) Training by the recruitment agency
   b) Training by the recruitment agencies training organisation?
   c) Training by the factory staff
   d) Training by a private enterprise
   e) Government entity
   f) Training by a union
   g) Never received any training
   h) No training
   i) All of the above

6) Investigations into fraud and government service suppliers in 2012 highlighted large amounts of public money were spent on apprenticeship training with service suppliers including A4e in the GLAA sector.
   a) As a former board member, what conclusions did the GLA conclude to the government investigations, as minutes of meetings in 2012 indicate GLA board members were involved?
   b) How many other apprenticeship training suppliers were investigated?
   c) How many licensed gangmasters were investigated?
   d) The apprenticeships training funds were for long-term jobs, not short-term agency workers. Was the difference investigated?
   e) Is there anything else you would like to add?

7) Who monitors the licensed gangmaster accommodation offset claims? Explore.

8) In the gangmaster industries, what is a Service Level Agreement and how does it operate between the food manufacturers and licensed gangmaster? Explore.

9) What does the GLAA REC Contract for Service Model consist of, or incorporate or look like that was created in 2010 with the GLA?

10) What sort of work contract do GLAA licensed and unlicensed gangmasters offer their workers?
    a) Contract in Service i.e., Contract of Employment
    b) Contract for Service i.e., Zero Hour Contract
    c) Other

11) Workers are referred to as employees at the GLAA when none of them are employed. They are workers on a CFS which is a ZHC i.e. in a non-standard form of employment and that's using ILO terms.
    The GLA and GLAA have for years provided advice to the gangmaster sectors for deductions or payments from worker wages for benefit cards, accommodation, transport, insurance. Workers may work 15 hrs one week, 40 the next, 10 the next, 35 the next, 18 the next.
    If payments are made from their weekly wage of 15 hrs or 10 hrs they may only earn 4-5 hrs pay and they may not be entitled to Universal Credit. Why is this allowed, encouraged and why isn't there a cut off point?

12) Has GLAA Charge rate guidance been checked with HMRC?

    I have tried to locate the DEFRA 2003 analysis where it says on page 1 "DEFRA states" …… It doesn't seem to exist? Can you help me with that please?

13) Does the GLAA provide numbers of workers on a CFS which is a ZHC to the ONS as all worker and employee numbers help design policy in the UK?
    The LFS indicates around 1m workers.

However, the GLA and GLAA provides a platform for the gangmaster industries with workers on a CFS/ZHC. I would suggest millions of workers are working from a CFS which is a ZHC of possibly 6 – 10 m.
Do you have any comments with regard to this?

14) The GLA and GLAA's secretariat and governance have made employment decisions for workers i.e. status, payments from wages etc
    j) Have decisions made, benefitted the flexible workforce?
    k) Have they affected the UK workforce?

15) Similar to what has recently happened recently with the PO Ferries carry on, the GLA were informed in 2014 of British workers being replaced by EU workers in food manufacturing and food processing by licensed gangmasters, and in particular by GLA former board members.
    Could you advise me of what action was taken to stop those actions continuing and how such actions are monitored or managed now?

16) How did the GLAA ensure workers on a CFS/ZHC received adequate Personal Protective Equipment, Statutory Sick Pay and health and safety measures in the licensed gangmaster environment during the coronavirus pandemic?

17) The UK had the highest number of Covid cases in Europe.
    What advice if any, did the DLME provide the GLAA in response to the COVID-19 pandemic to ensure workers in their remit were safe in their workplace?

    Are you satisfied with the GLAA and Gold Command responses to protect workers in the GLAA remit?
    The Care Quality Commission took action to stop the spread of COVID-19 by agency workers moving from care home to care home.
    What action did the GLAA/Gold Command take to prevent or stop agency workers
    being moved from factory to factory, e.g., agency workers moving from the textile
    industry into car manufacturing into the care sector into their Youth Hostel Accommodation into meat processing into ready meals etc?

18) How did and does the GLAA balance the issue of local labour and gangmaster labour?

19) In your opinion, is there any possibility the GLA now GLAA has exasperated human trafficking in any way? Explore.

Appendix 3.10: Interview Guide.
Recruitment & Employment Confederation (REC)

Sheffield Hallam University

Senior member of the Recruitment & Employment Confederation✔
Email list of themes✔
Consent form✔
Introductions ✔
Record✔
Transcribe and email a copy✔

1) Has the REC, in the past and/or currently encouraged REC members in the UK to recruit workers from recruitment agencies overseas?

2) Have you any idea how many EU workers via recruitment agencies or businesses, or licensed or unlicensed gangmasters have been transported from the EU into the UK?

   m) In the last 5 years ……
   n) In the last 10 years ……
   o) In the last 15 years ……

3) What sort of transport did or do they offer workers to travel to the UK?
   a) Plane b) Bus c) Car d) Other

4) What costs does the REC recommend to the recruitment industries to charge EU workers for transport into the UK? …….

GLAA:

5) What are the most common problems migrant workers ask their licensed gangmasters to resolve for them?
   Explore.

6) Have most common problems then been resolved in the long term at the GLAA? If so how, explore.

7) Could you tell me how many agency workers have received apprenticeship training in the licensed gangmaster sector?

   a) In the last 5 years
   b) In the last 10 years
   c) In the last 15 years

8) Who provides the training to temporary agency workers?
   a) Training by the recruitment agency
   b) Training by the recruitment agencies training organisation?
   c) Training by the factory staff
   d) Training by a private enterprise

e) Government entity
f) Training by a union
g) Never received any training
h) No training

9) How is apprenticeship training funding monitored in the licensed gangmaster sector?

10) How many EU agency workers including British workers have received public funding in the form of apprenticeship training and then moved into a permanent job role in the last 10 years?

11) An REC policy member was a member of the GLA/GLAA board. How important has that been to the REC?

Explore

12) Who monitors the licensed gangmaster accommodation offset claims?
Explore.

13) What is a Service Level Agreement?
Explore.

14) What sort of work contract do REC members offer their workers?

a) Contract in Service i.e., Contract of Employment
b) Contract for Service i.e., Zero Hour Contract
c) Other

15) What does the REC Contract for Service Model consist of, or incorporate or look like that was created in 2010 with the GLA?

16) What are licensed or unlicensed gangmasters able to request payment of from a worker's weekly pay?

a) Accommodation
b) Insurance
c) Benefit cards
d) Transport
e) Anything else

17) Do all deductions/payments and charge rate guidance need to be agreed with HMRC prior to use? If not, why not?

18) Workers on a 'Contract for Service'. Are deductions still taken from their weekly pay when the worker works for example, just 10 hours in a week?
Is there a cutoff point?
Explore

19) A ‘Contract for Service’ provides no fixed hours and is therefore a Zero Hour Contract.
Does the REC provide numbers of workers on a CFS to the ONS?

20) Can you put an estimation on numbers of workers recruited on a CFS via REC members in the UK?

21) How did the REC ensure workers received adequate Personal Protective Equipment, Statutory Sick Pay and health and safety measures in the licensed gangmaster environment during the coronavirus pandemic?

22) My understanding is, is that the GLA was set up to license gangmasters to protect workers. However, the GLA now GLAA seems to provide a platform for licensed gangmasters.

Comments?

Appendix 3.11: Ethics Approval

Title of research study	Ethics review reference	Approval date	Thesis chapter(s)
The Gangmasters & Labour Abuse Authority and Precarious Workers In The UK	ER38362010	1 November 2021	Chapter 3

Status change comment
DO NOT WRITE ANYTHING IN THIS NOTES BOX AS IT CAN BE SEEN BY ALL OTHER USERS. Proceed to select the workflow status and click Done.

- Dear Caroline

Title of Ethics Review: The Gangmasters & Labour Abuse Authority and Precarious Workers In The UK
Ethic Review ID: ER38362010

The University has reviewed your ethics application named above and can confirm that the project has been approved.

You are expected to deliver the project in accordance with the University's research ethics and integrity policies and proceduresthttps://www.shu.ac.uk/research/ethics-integrity-and-practice.

As the Principal Investigator you are responsible for monitoring the project on an ongoing basis and ensuring that the approved documentation is used. The project may be audited by the University during or after its lifetime.

Should any changes to the delivery of the project be required, you are required to submit an amendment for review.

Wishing you success you with your study

Kind regards,
Ethics Research Support

*** This is an automatically generated email, please do not reply ***

Appendix 4.1: Summaries of Data from Survey Questions in the Questionnaire
Summary of Survey Questions 1, 2 and 3

Summary of Survey Questions 1, 2 and 3					
Respondent pseudonym	Male / Female	Yes / No Three interpreters helped with five English surveys	Q.1. How did you travel to the UK?	Q.2. Did you pay for your transport into the UK?	Q.3. Why did you come to the UK?
Dariusz	Male	Yes English	Plane	£ 100.00	Job offer in the EU from a recruitment agency
Filip	Male	Yes English	Plane	£ 300.00	Came of own accord to work
Jakub	Male	Yes English	Car	€ 150.00	Came of own accord to work
Jan	Male	No English	Bus	£ 100.00	Came with family to work
Józef	Male	Yes English	Plane	£ 100.00	Job offer in the UK from a recruitment agency
Michal	Male	No English	Plane	No Response	Came of own accord to work
Piotr	Male	No Polish	Car	No Response	Job offer in the EU from a recruitment agency
Ryszard	Male	No Polish	Car	Yes	Came of own accord “I’d looked a job”
Stefan	Male	No Polish	Plane	No Response	Came of own accord for work
Szymon	Male	No English	Plane	No	Came with family for work
Anna	Female	No Polish	Bus	Yes	Job offer in the EU from a recruitment agency
Halina	Female	No Polish	Plane	No	Job offer in the EU from a recruitment agency
Karolina	Female	No Polish	Plane	Yes	Came with family of their own accord to work
Magdalena	Female	No Polish	Plane	Yes	Came of own accord to work

Róża	Female	No Polish	Plane	Yes	Came of own accord to work
Tekla	Female	Yes English	Car	£ 50.00	Came with a friend
Zofia	Female	No English	Car	No Response	Came with family
17 respondents: Male 10, Female 7 Transport into UK: Plane 10, Car 5, Bus 2 Three Interpreters helped with 5 English surveys: Dariusz, Filip, Jakub, Józef and Tekla					

Appendix 4.2: Summary of Survey Questions 4, 5 and 6

Summary of Survey Questions 4, 5 and 6			
Respondent pseudonym	Q.4. From arriving in the UK, how many jobs have the respondents had?	Q.5. Where do you work?	Q.6. How do you sign into the factory or work area?
Dariusz	4	Warehouse Care home	Card, wear an AMT voice/devise/finger scanner
Filip	More than 4 jobs: "I have been working for agencies, and they recruit only for peak time."	Food factory Warehouse	Clock in and out
Jakub	1	Warehouse	Clock in and out
Jan	No Response	Warehouse	Clock in and out
Józef	4	Food factory Quarry	Scan in and out
Michal	6	Food factory Warehouse Betting agency	Clock in and out Sign papers in and out Scan in and out
Piotr	3	? Fast Food Chain	 Clock in and out
Ryszard	More than 4 jobs	Mitie, Tesco, Greencore, Ambition agency "Food factory for 16 years" (Food factories and food warehousing/packing)	Clock in and out
Stefan	2	Food factory	Clock in and out Sign papers in and out
Szymon	1	No Response	Clock in and out
Anna	1	No Response	Clock in and out
Halina	2	Food factory	Clock in and out
Karolina	2	Food factory	Clock in and out
Magdalena	2	Food factory	Scan in and out
Róża	3	Food	Clock in and out
Tekla	1	Warehouse	Clock in and out
Zofia	1	Food factory	Clock in and out
The researcher accepted the respondents first response as their current job.			

Any listings following their first current job have been counted as their second or third jobs dependent on any additional comments and the understanding of the researcher and comments written by respondents in the questionnaires.

The researcher's understanding of Piotr in subcategory 4.1.2.2.10, and Filip highlighted in subcategory 4.1.2.2.20, and both in subcategory 5.3.1.1 is as follows:

The researcher's understanding of Piotr:
Piotr had chosen to fill in a Polish questionnaire, although Piotr provided confusing responses. Piotr had driven his own car to the UK in response to a job offer from a recruitment agency in the EU. Piotr has had three jobs in the UK and currently works at a fast food chain on a ZHC for 13 hours p.w., and for an unknown recruitment agency for 20 - 30 hours p.w. with no indication of where Piotr worked those hours. Piotr confirmed they had no rest breaks, but one job had a 15 minute rest break, he had no deductions from his payslip which was paid via their application. Piotr made no comments in relation to work problems; they had not heard of the GLAA and so had sought help from a charity.

The researcher's understanding of Filip:
Filip had a good understanding of English and had chosen to part fill in an English questionnaire with additional information responded to by an interpreter. Filip travelled on their own accord to the UK. Filip had paid £300 to travel by plane and had worked for two or three different recruitment agencies, but Filip named only Mach Recruitment where Filip had worked four different jobs at peak times in food factories and food warehouses, because the recruitment agency only contacted them to work when they were needed. Filip clocked in and out for each shift, working 30 - 40 hours p.w. on a CFS with no deductions, no regular hours but a half hour rest break with his payslip delivered by email or by hand. Filip described how Mach Recruitment often forgot to pay him which may be why Filip received his payslips in different ways. Filip said he would like to join a union and had joined the GMB union at Amazon. This is because the GMB union markets their help for Amazon workers and employees in warehouses and should food workers like Filip have worked in both a food factory and a warehouse including one that is an Amazon warehouse, then that worker will locate GMB assistance, thus providing Filip as a worker with direct trade union help, not GLAA help. Filip described the UK like America because both America and the UK paid very low SSP in contrast to Poland where 80% of the workers' pay is paid as SSP. Filip's response data indicates they could have two jobs: one job working for Mach Recruitment on a CFS at peak times, and a

second job at Amazon, although this contract, gangmaster and hours of work and shifts etc are not clear.

Appendix 4.3: Summary of Survey Question 7

Recruitment Agencies/Gangmasters Identified by the Respondents	
Respondent Pseudonym	Recruitment Agency/Gangmaster
Dariusz	TR6 Challenge Workforce People Solution
Filip	Mach Recruitment
Jakub	Top Gear Cordant then PMP then TRG
Jan	Premier Personnel
Józef	Staffline
Michal	Blue Arrow Flame Recruitment Taskmaster Resources Ltd
Piotr	No Response
Ryszard	Ambition
Stefan	No Response
Szymon	Samolotem (Translated via Google translation from Polish to English: "Aeroplane") Komtrolce by Tom (Translated via Google translation from Polish to English: "Controlled by Tom")
Anna	Angel
Halina	Staffline
Karolina	No Response
Magdalena	No Response
Róża	No Response
Tekla	Cordant, PMP
Zofia	No Response
Total	11 respondents 6 non-respondents 16 Recruitment Agencies/Gangmasters

Appendix 4.4: Summary of Survey Questions 8, 9, 10 and 11

Summary of Survey Questions 8, 9, 10 and 11					
Respondent pseudonym	Q.8. Type of Contract	Q.9. Training	Q.10. Payslip	Q.11. Deductions from pay	Paid for by respondents
Dariusz	CFS 6 hours contract p.w.		Email Hand	Travel: £25 p.w. Accommodation: £85 p.w. 20 people shared a room Did not pay NIC	DBS: £45 p.w. Safety shoes
Filip	CFS		Email Hand	No	No Response
Jakub	CFS 7.5 hours p.w.		Email Post	No Response	No Response
Jan	CFS		Email	No	No Response
Józef	CFS		Email	No	No
Michal	CoE		Email Hand	Transport: £30 for 3 months Accommodation for 3 months	Yes
Piotr	ZHC 13 hours p.w.		Application	No	No
Ryszard	CFS		Email Post	Transport (no further detail)	No Response
Stefan	CoE		Email	No	No Response
Szymon	CoE		No Response	No	No
Anna	CoE		Hand	No	No
Halina	CoE		Email	No	No Response
Karolina	CoE		Email	No	No Response
Magdalena	CoE		Application	No	No
Róża	CoE		Email	No	No
Tekla	CFS		Email	No	No
Zofia	CoE		Email	Transport: £40 p.w.	No

Appendix 4.5: Summary of Survey Question 12

Respondent written comments in relation to Work Problems				
Respondent pseudonym	Not Paid Hourly rate	Not Paid Holiday pay	No regular work hours	Other, please specify
Dariusz	✔	✔	✔	Worked 24 hours one week but has a contract for 6 hours Dariusz must take his holidays before May Gangmaster will text to cancel their shift for the following day so they work less hours Dariusz does not receive the same benefits as those employed and they are disciplined for poor performance located by an AMT which monitors their work performance.
Filip			✔	
Jakub				Encouraged not to speak Polish or they could be fired They are just a number on a clock in/clock out card Top Gear, PMP, Cordant, Challenge-trg Group identified as their gangmasters Challenge-trg Group does not send Jakubs pension contributions to his pension fund. Jakub found this out whilst checking his pension online. Challenge-trg Group admitted not sending funds to pension fund. Jakub was asked to take forms to his gangmaster to fill in. Their gangmaster had not topped up their pension. Emails for holidays: agency says holiday numbers don't have to be written on the payslips – this was English law. After 5 years of agency work, Jakub had an interview for Tesco but due to their poor English, Jakub did not get the job. Jakub couldn't study English as inconsistent night shifts – 2 am, 4 am, 6 am, 8 am starts and Jakub never knew when his shifts were/inconsistent data Legal deductions Can text 11 pm for 4 am shift Jakub is 66 year old – paying to state pension and private pension, NEST and DRIVE pension Gangmaster trains 20 people p.w., if they complain there is no work and people don't stay PMP and Challenge-trg Group do not provide agency workers with safety shoes Paid £5.00 p.w. to come to work, sometimes no pay parity up to one year ago Respondent claims that "UK does not abide by EU laws."
Jan		✔		
Józef	No Response			
Michal	✔		✔	

Piotr	No Response			
Ryszard	No Response			
Stefan	No Response			
Szymon		✔	✔	
Anna			✔	
Halina	No Response			
Karolina	No Response			
Magdalena	No Response			
Róża	No Response			
Tekla			✔	Sick pay wasn't paid by agency, but the government paid, and it was low pay (around £90.00 p.w. for full time hours) Agency pension is very low and sometimes is not enough for living after retirement age, so they continued working When I first started working for the agency, we had less breaks than company workers (just one 15 mins break and 30 min lunch break, compared to two 15 mins break and lunch for company workers). Two years ago, this changed but some agency workers don't use one of the breaks due to making 'performance' problems Agency workers are required to have 85% performance compared to no performance for company workers. If agency worker doesn't achieve the performance goal, team leaders from the agency ask them if there are any problems and how could they help (but they never even try to help) and afterwards the worker has disciplinary procedure Agency workers are not allowed to have the uniform supplied from the company and Tesco employee can get full uniform (jackets, shirts, trousers, socks, long johns). Because we work in a cold environment agency workers have to use private clothing that causes damage to own clothes. Agency employees don't have rota available. They have to confirm the shift message every day compared to Tesco workers who have a rota for a whole year. Working hours are not provided in advance and they are given by the text and can vary every day. For example, when at the end of the shift the work in the warehouse is limited, agency employees are sent home early, not being able to stay until end of the shift.
Zofia				Minimum wage
Total	2	3	6	

Appendix 4.6: Summary of Survey Question 13

Summary of Survey Question 13					
Respondent pseudonym	Up to 10 hours p.w.	10 - 20 hours p.w.	20 - 30 hours p.w.	30 - 40 hours p.w.	More than 40 hours p.w.
Dariusz		✔ 24 but cancel via test day before, always Mondays			
Filip				✔	
Jakub				✔	
Jan				✔	
Józef		✔		✔	
Michal					✔
Piotr		✔	✔		
Ryszard				✔	
Stefan		✔			
Szymon				✔	
Anna				✔	
Halina	No Response				
Karolina	✔	✔	✔	✔	
Magdalena				✔	
Róża	✔			✔	✔
Tekla		✔		✔	
Zofia	No Response				
Total	2 No Response = 2	6	2	11	2
Workers with varied hours between 0 and 30 hours = 10 Workers with varied hours between 30 and 40 hours plus = 13 Indicates all 17 respondents work varied hours.					

Appendix 4.7: Summary of Survey Question 17

Summary of Survey Question 17		
Respondent Pseudonym	Yes	No
Dariusz	✔ Saw signs in Birmingham for farm worker	
Filip		✔
Jakub		✔
Jan		✔
Józef		✔
Michal		✔
Piotr		✔
Ryszard		✔
Stefan		✔
Szymon		✔
Anna		✔
Halina		✔
Karolina		✔
Magdalena		✔
Róża		✔
Tekla		✔
Zofia		✔
Total		✔
Total	1	16

Appendix 4.8: Summary of Survey Questions 18, 19 and 20

Summary of Survey Questions 18, 19 and 20							
Respondent pseudonym	Q.18. Yes	No		Q.19. Yes	No		Q.20. Help/comments
Dariusz	✔			No Response			Unite the Union, after disciplinary helped another agency worker
Filip	✔			✔			Worked in Asda warehouse. I quit because of racism and if employee is foreign only lift heavy items for eight hours, now at Amazon and member of GMB Union
Jakub		✔			✔		
Jan	No Response				✔		
Józef		✔		✔			
Michal		✔		No Response			
Piotr		✔			✔		
Ryszard		✔		No Response			
Stefan		✔			✔		
Szymon	✔			✔			
Anna	✔			No Response			
Halina		✔			✔		
Karolina		✔			✔		
Magdalena		✔			✔		
Róża		✔			✔		
Tekla		✔		✔			
Zofia		✔			✔		
Total	4	12		4	9		2

Appendix 4.9: Participant Data: Coding and Sourcebook to Themes

Research Question	Literature Review Chapter	Category	Code	Code	Code
RQ 1, 2	2.1, 2.2	RQ 1. HIStory	GLAA EXPert	FORMation: GLAA	
Data Codes: RQ 1, RQ 2					
HIS/EXP/FORM HIS/EXP/REB				REBrand	
HIS/EXP/CON				CONduct Regulations	
HIS/EXP/PREC				PRECision Prospecting	
HIS/EXP/ALP				Formation: ALP	
HIS/AWR/COM/MOVE			AWR	COMmodity	MOVEment of Workers
HIS/AWR/CBI				CBI TUC	
HIS/AWR/MOD				MODels	
HIS/2015/CON			Modern Slavery Act 2015	CONduct Regulations	
HIS/2015/COM				COMpulsory Labour	
HIS/2015/REM				GLAA REMit	
HIS/2016/SCOT/NI			Immigration Act 2016	SCOTland and NI	
HIS/2016/SAWS/COE				SAWS	CFS/ZHC COE Confusion
HIS/2016/SAWS/53					53 countries
HIS/2016/OP				OPeration Fort	
HIS/2016/LPF				Level Playing Field	
HIS/2016/SHROP				SHROPshire	
HIS/TRAN/ZHC			Workers: TRANsport into the UK	ZHC/CFS	
HIS/TRAN/42				GLA Brief 42 (Appendix 5.1)	
HIS/TRAN/HOL				HOLiday Pay	
HIS/GLAA/LPC/ENF HIS/GLAA/LPC/DIR			GLAA Board Members	Former LPC Member	ENForcement Decisions
HIS/GLAA/TA				Trade Associations	DIRectors of Licensed Gangmasters
HIS/ALP/MAR/POL			ALP Services	ALP MARketing	POLicy Papers

RQ 1, 2	2.1, 2.2	RO 2. TECHnical Issues	GLAA CRG	DEFRA Analysis	DEDuctions
Data Codes: RQ 1, RQ 2					
TECH/CRG/DEF/DED/TRAN TECH/CRG/HMRC				Checked with HMRC?	
TECH/DLME			DLME Strategy		
TECH/MOD			Sector MODels		
TECH/LEG			GLAA LEGislation		
TECH/FIG2.3			CFS is a ZHC (FIGure 2.3)		
TECH/CON/MOD/PROF			Gangmaster CONtracts	MODel	PROFit
TECH/CON/MOD/FIG2.3					CFS Model (FIGure 2.3)
TECH/CON/NMW				NMW/NLW /RLW	
		DEDuctions cont…			
TECH/CRG/DEF/DED/PURP			HMRC PURPoses		
TECH/CRG/DEA/DED/TRAN			TRANsport		
TECH/CRG/DEF/DED/BRI			BRI		
TECH/CRG/DEF/DED/ACC			ACCommodation Offset		
TECH/CRG/DEF/DED/CFS/WTR/WTD/ AWR			REC CFS Model	WTR	WTD and AWR
TECH/CRG/DEF/DED/COM			COMmodity		
TECH/CRG/DEF/DED/CIPD/ZHC			CIPD report	ZHC	
TECH/CRG/DEF/DED/CFS/CUT			CFS is a ZHC	CUToff point?	
TECH/CRG/DEF/DED/COE/POW			ZHC as a COE	POWers Issue	
TECH/CRG/DEF/DED/DLME			DLME Strategy		
TECH/CRG/DEF/DED/TAC/FORT/WAR			Operation TACit	Operation FORT	No WARrant to enter premises
Table 4.26 (pp. 168-177)					

RQ 1, 2, 3	2.1, 2.2 2.3	RO 3. Employee Status	Employment Status DOCument		
Data Codes: RQ 1, RQ 2, RQ 3					
STAT/DOC STAT/REM			GLAA Documents REMoved from Observation		
STAT/PROB/PAY			Worker common PROBlems	PAYroll issues	
STAT/PROB/LAN				LANguage and Guidance	
STAT/REP/GROUP			Worker REPresentation	Working GROUPs	
STAT/REP/TRAD/BOA				TRADe Associations	GLA/GLAA BOArd Members
STAT/REP/TRAD/DIR					DIRectors of Licensed Gangmasters
STAT/COM/ONS			COMpanies House	ONS Service Statistics	
STAT/COM/INT/UC				INTernational Workforce	Universal Credit
STAT/COM/SIC				SIC and SOC Codes	
STAT/COM/1996				Employment Rights Act 1996 s.230(1.b)	

Appendix 4.10:
Information and Questions to locate GLAA registered workers in ONS data

- The Treaty on the Functioning of the EU commenced in 2004.
- The Gangmasters (Licensing) Act 2004 set up the Gangmasters Licensing Authority (GLA) in 2005.
- The Gangmasters Licensing Authority, now the Gangmasters and Labour Abuse Authority licenses gangmasters in the food processing and packaging sectors and is responsible for all workers across the UK. These workers are in employment through licensed and unlicensed gangmasters that can be known as recruitment agencies, employment agencies, employment businesses, managed service providers, operators and labour providers.
- Agency workers in these areas are flexible workers because they are people in employment on zero hours contracts. Their Zero Hour Contracts are otherwise known as a "Contract for Services".

1. Do you collect any worker data directly from the licensed and unlicensed gangmaster industries?

2. Please describe the data collection techniques of agency workers in the food manufacturing industries.

3. Where are food workers located in the ONS data for those workers that are:
   a. Employed b) Workers on a Contract for Service which is a ZHC

4. How many food workers are in the ONS data for those workers that are?
   a. Employed b) Workers on a Contract for Service which is a ZHC

5. When incorporating workers on a Contract for Service (which is a zero hour contract) in ONS data, have you taken into consideration deductions from their payslips (agreed with the GLA/GLAA and presumably HMRC) in the context of:

   Total Earnings
   Hourly pay
   Transport
   Place of residence compared to transported place of work
   Insurance and National Insurance Contributions

6. Are workers from the service sector then transferred to the EMP17 dataset for "People in employment on zero hours contracts", therefore incorporating workers provided by licensed and unlicensed gangmasters from Service Level Agreements working on a "Contract for Service" which is a Zero Hour Contract?

7. Are numbers of workers and their contract types collected from businesses in the "Monthly Business Survey turnover of services industries" sections 71 to 96?
   If numbers of these workers are collected separately, where are they in the ONS data?
   These sections may include "agency" transport workers, agency warehousing workers e.g., Amazon, agency workers in consulting services, agency workers in employment services e.g., REC members and the GLAA, agency cleaning

workers and agency workers in business support services that all work from a Contract for Service/ZHC?

8. How many agency food workers in the licensed gangmaster industries in the GLAA remit on Contracts for Services are there in the UK for each year from the inception of the GLA 2004 to present day?

9. How many agency food workers in the licensed gangmaster industries in the GLAA remit on Contract for Services are there in each region in the UK for each year from 2004?

10. An agency worker is temporary, they are not permanent, they are all temporary agency workers.
    Temporary agency workers have contracts for fixed amounts of hours.
    Workers on a Contract for Services are workers on zero hours contracts, just that, they do not have agreed hours.
    What is the reasoning behind the ONS decision to group workers together under the term “agency worker in permanent role” in other ONS data?

Appendix 4.11:
Legal Deductions taken from GLAA Workers on a 5-day week payroll

Worker A:
Works 48 hours over 5 days x £ 9.50 = £ 456.00 – Deductions = £ 323.10
- £ 50.00 Transport
- £ 10.00 Personal Insurance
- £ 60.90 Accommodation
- £ 2.00 Prepaid Benefit card
- £ 10.00 Electric and Gas

Worker B:
Works 25 hours over 3 days x £ 9.50 = £ 237.50 – Deductions = £ 195.50
- £ 30.00 Transport
- £ 10.00 Personal Insurance
- £ 2.00 Prepaid Benefit card

Worker C:
Works 20 hours over 3 days x £ 9.50 = £ 190.00 – Deductions and Payment = £ 67.10
Worker C accepted £ 50.00 advance of wages from their licensed gangmaster for five days transport to work
- £ 50.00 Transport (Payment)
- £ 10.00 Personal Insurance (Deduction)
- £ 60.90 Accommodation (Deduction)
- £ 2.00 Prepaid Benefit card (Deduction)

Worker D:
Works 15 hours over 2 days x £ 9.50 = £ 142.50 – Deductions = £ 100.50
- £ 20.00 Transport
- £ 10.00 Personal Insurance
- £ 2.00 Prepaid Benefit card
- £ 10.00 Safety shoes

Worker E:
Works 30 hours over 4 days x £ 9.50 = £ 285.00 – Deductions = £ 193.00
- £ 40.00 Transport
- £ 10.00 Personal Insurance
- £ 2.00 Prepaid Benefit card
- £ 40.00 Pension (Not paid by licensed gangmaster with their contribution to Worker E pension fund)

Appendix 4.12:
Supermarkets, Food Manufacturing and Food Processing companies, and Licensed Gangmasters with their chosen (SIC) Codes, and how they provide their data to the ONS

Supermarkets, Food Manufacturing and Food Processing companies, and Gangmasters with their chosen (SIC) Codes and how they provide their data to the ONS	
Examples: Businesses and Companies with chosen (SIC) Codes that are inaccurate or incorrect	Examples of accurate and correct (SIC) Codes that would provide a better description of the company or business (Companies: can use up to four, five-digit SIC Codes)
Marks & Spencer SIC 47190: Other retail sale in non-specialised stores Marks & Spencer could agree an SLA with a FMC who agree an SLA with a recruitment agency for the provision of the precariat in any GLAA/MSPM with the precariat working from a CFS Marks & Spencer set up financial institutions to sell insurance to the precariat on a CFS directly or via ghost-brokering further down the food supply chain (Plimmer and Rigby, 2014, January 23; Money Helper, 2025)	<u>Section D:</u> SIC 35140: Trade in electricity <u>Section G:</u> SIC 46150: Agents involved in the sale of textiles, clothing, fur, footwear, and leather goods SIC 46190: Agents involved in the sale of a variety of goods SIC 47210: Retail sale of fruit and vegetables in specialised stores SIC 47220: Retail sale of meat and meat products in specialised stores SIC 47230: Retail sale of fish, crustaceans, and molluscs in specialised stores SIC 47230: Retail sale of bread, cakes, flour confectionery and sugar confectionery SIC 47240: Retail sale of beverages in specialised stores SIC 47250: Retail sale of food in specialised stores SIC 47290: Other retail sale of food in specialised stores SIC 47599: Retail of furniture, lighting, and similar (not musical instruments or scores) in specialised store SIC 47650: Retail sale of games and toys in specialised stores SIC 47710: Retail sale of games and toys in specialised stores SIC 47710: Retail sale of clothing in specialised stores SIC 47721: Retail sale of footwear in specialised stores SIC 47750: Retail sale of cosmetic and toilet articles in specialised SIC 47782: Retail sale by opticians <u>Section I:</u> SIC 56290: Other food services <u>Section K:</u> Financial and Insurance Activities (Separate listed company) <u>Section L:</u> Real Estate Activities (Separate listed company)
Sainsbury's Supermarkets Ltd SIC 47110: Retail sale in non-specialised stores with food, beverages or tobacco predominating Sainsbury's Supermarkets Ltd could agree an SLA with a FMC who agree an SLA with a recruitment agency for the provision of the precariat in any GLAA/MSPM with the precariat working from a CFS	<u>Section D:</u> SIC 35140: Trade in electricity <u>Section G:</u> SIC 46150: Agents involved in the sale of textiles, clothing, fur, footwear, and leather goods SIC 46190: Agents involved in the sale of a variety of goods SIC 47210: Retail sale of fruit and vegetables in specialised stores SIC 47220: Retail sale of meat and meat products in specialised stores SIC 47230: Retail sale of fish, crustaceans, and molluscs in specialised stores SIC 47230: Retail sale of bread, cakes, flour confectionery and sugar confectionery SIC 47240: Retail sale of beverages in specialised stores SIC 47250: Retail sale of food in specialised stores SIC 47290: Other retail sale of food in specialised stores

Sainsburys Supermarkets Ltd could set up financial institutions to sell to the precariat on a CFS via ghost-brokering further down the food supply chain (Plimmer and Rigby, 2014, January 23; Money Helper, 2025)	SIC 47599: Retail of furniture, lighting, and similar (not musical instruments or scores) in specialised store SIC 47650: Retail sale of games and toys in specialised stores SIC 47710: Retail sale of games and toys in specialised stores SIC 47710: Retail sale of clothing in specialised stores SIC 47721: Retail sale of footwear in specialised stores SIC 47750: Retail sale of cosmetic and toilet articles in specialised SIC 47782: Retail sale by opticians <u>Section I:</u> SIC 56290: Other food services <u>Section K:</u> Financial and Insurance Activities (Separate listed company) <u>Section L:</u> Real Estate Activities (Separate listed company)
Tesco PLC SIC 47110: Retail sale in non-specialised stores with food, beverages or tobacco predominating Tesco PLC could agree an SLA with a FMC who agree an SLA with a recruitment agency for the provision of the precariat in any GLAA/MSPM with the precariat working from a CFS Tesco PLC could set up financial institutions to sell insurance to the precariat on a CFS via ghost-brokering further down the food supply chain (Plimmer and Rigby, 2014, January 23; Money Helper, 2025)	<u>Section D:</u> SIC 35140: Trade in electricity <u>Section G:</u> SIC 46150: Agents involved in the sale of textiles, clothing, fur, footwear, and leather goods SIC 46190: Agents involved in the sale of a variety of goods SIC 47210: Retail sale of fruit and vegetables in specialised stores SIC 47220: Retail sale of meat and meat products in specialised stores SIC 47230: Retail sale of fish, crustaceans, and molluscs in specialised stores SIC 47230: Retail sale of bread, cakes, flour confectionery and sugar confectionery SIC 47240: Retail sale of beverages in specialised stores SIC 47250: Retail sale of food in specialised stores SIC 47290: Other retail sale of food in specialised stores SIC 47599: Retail of furniture, lighting, and similar (not musical instruments or scores) in specialised store SIC 47650: Retail sale of games and toys in specialised stores SIC 47710: Retail sale of games and toys in specialised stores SIC 47710: Retail sale of clothing in specialised stores SIC 47721: Retail sale of footwear in specialised stores SIC 47750: Retail sale of cosmetic and toilet articles in specialised SIC 47782: Retail sale by opticians <u>Section I:</u> SIC 56290: Other food services <u>Section K:</u> Financial and Insurance Activities (Separate listed company) <u>Section L:</u> Real Estate Activities (Separate listed company)
2 Sisters Food Group Ltd SIC 10120: Processing and preserving of poultry meat 2 Sisters Food Group Ltd agree an SLA with Staffline for the provision of the precariat in any GLAA/MSPM with the precariat working from a CFS 2 Sisters Food Group Ltd are part of the Marks & Spencer, Sainsburys and Tesco food supply chains that enjoy partnerships	SIC 10110: Processing and preserving of meat SIC 10120: Processing and preserving of poultry meat SIC 10130: Production of meat and poultry meat products SIC 10710: Manufacture of bread; manufacture of fresh pastry goods and cakes SIC 10720: Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes SIC 10850: Manufacture of prepared meals and dishes SIC 10890: Manufacture of other food products n.e.c.

with gangmasters to sell insurance to the precariat as a deduction from their CFS via ghost-brokering (Plimmer and Rigby, 2014, January 23; Money Helper, 2025)	
DHL International (UK) Ltd SIC 96090: Other service activities not elsewhere classified DHL International (UK) Ltd agree an SLA with a recruitment agency for the provision of the precariat in any GLAA/MSPM with the precariat working from a CFS	SIC 49410: Freight transport by road SIC 51210: Freight air transport SIC 52102: Operation of warehousing and storage facilities for air transport activities SIC 52103: Operation of warehousing and storage facilities for land transport activities SIC 52219: Other service activities incidental to land transportation, n.e.c. SIC 52242: Cargo handling for air transport activities SIC 52243: Cargo handling for land transport activities SIC 52290: Other transportation support activities SIC 53100: Postal activities under universal service obligation SIC 53201: Licensed carriers SIC 53202: Unlicensed carriers
Bakkavor Foods Ltd SIC 10850: Manufacture of prepared meals and dishes Bakkavor Food Ltd agree an SLA with Staffline (2024) for the provision of the precariat in any GLAA/MSPM with the precariat working from a CFS Bakkavor Food Ltd are part of the Marks & Spencer, Sainsburys and Tesco food supply chains that enjoy partnerships with gangmasters to sell insurance to the Precarit on a CFS via ghost-brokering (Plimmer and Rigby, 2014, January 23; Money Helper, 2025)	SIC 10130: Production of meat and poultry meat products SIC 10710: Manufacture of bread; manufacture of fresh pastry goods and cakes SIC 10720: Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes SIC 10850: Manufacture of prepared meals and dishes SIC 10890: Manufacture of other food products n.e.c.
Staffline Recruitment Ltd SIC: 78200 - Temporary employment agency activities Staffline Recruitment Ltd recruit the precariat on a CFS Staffline sell their own insurance via their own inhouse insurance company, or as part of an SLA owned by their client	SIC 78109: Other activities of employment placement agencies SIC 49320: Taxi operation SIC 49390: Other passenger land transport SIC 52219: Other service activities incidental to land transportation, n.e.c. SIC 55100: Hotels and similar accommodation SIC 66220: Activities of insurance agents and brokers SIC 78300: Human resources provision and management of human resources functions SIC 85590: Other education n.e.c. SIC 85600: Educational Support Services SIC 96090: Other support services n.e.c.

to sell insurance to the precariat on a CFS via ghost-brokering (Plimmer and Rigby, 2014, January 23; Money Helper, 2025) Staffline Recruitment Ltd set up an Apprenticeship Training Agency (ATA) as PeoplePlus Skills for Growth (2022) and other Group Training Associations (GTAs) to acquire apprenticeship levies (GLA, 2011a)	Business Register and Employment Survey 2015: Excludes agency workers (s. A(9), s. B(2), s. C(7)) and businesses and companies cannot include them as employees (s. A(9), s. B(2), s. C(7)).
Hays Recruitment Services Ltd SIC: 78200 - Temporary employment agency activities Hays Recruitment Ltd recruit the precariat on a CFS Hays sell their own insurance via their own inhouse insurance company, or as part of an SLA with their client, to sell insurance to the precariat on a CFS via ghost-brokering (Plimmer and Rigby, 2014, January 23; Money Helper, 2025)	SIC 78109: Other activities of employment placement agencies SIC 78300: Human resources provision and management of human resources functions SIC 85590: Other education n.e.c. SIC 85600: Educational Support Services Business Register and Employment Survey 2015: Excludes agency workers (s. A(9), s. B(2), s. C(7)) and businesses and companies cannot include them as employees (s. A(9), s. B(2), s. C(7)).
EQT Partners SIC: 64205 Activities of Financial Services holding companies EQT Partners could, by way of mergers and acquisitions, buy businesses and companies thus absorbing the precariat in any GLAA/MSPMs to sell insurance to the precariat directly or as part of their SLA package or via ghost-brokering (Plimmer and Rigby, 2014, January 23; Money Helper, 2025) Fintech Flexible Finance (Fintech part of the FinnCap was an AIM-listed plc)	A portfolio of companies requiring substantial SIC Codes. EQT (2024) comprise "seven business lines: EQT PE, BPEA EQT, EQT Future, EQT Ventures, EQT Life Sciences, EQT Growth and EQT Public Value. Owns the SSP Food Service company with "Caffe Ritazza, Upper Crust and Bonne Journee and franchised brands such as Marks & Spencer, Starbucks and Burger King." Combine employees and the precariat from Table 1.1 on a CFS within data. A flexible finance company and a recruitment agency promoting AI, robotic process automation, block chain and big data. Flexible platform to unlock finance from unpaid gangmaster invoices

Sonovate (2025) SIC: 62090 Other information technology service activities SIC: 78200 Temporary employment agencies activities Invoice financing up to 100% for temporary and permanent placements Could offer finance to the precariat on their payslips for vehicles for example cars and mortgages Could gather the precariat together with control of income, mortgages, incomings and outgoings Licensed and Unlicensed Gangmaster sectors 78200 - Temporary employment agency activities Free movement or circulation of workers in the remit of the GLAA	**During the coronavirus pandemic, the House of Lords confirmed key agriculture service sector workers could continue to come to the UK under the key worker category: "food and other necessary goods" (GOV.UK, 2022, January 2)** **Workers in the GLAA remit could return home any time under the same category.** **Gaps and changes to legislation (See Figure 1.1, Appendix 1.1)** **GLAA licensed gangmaster paymaster Managed Services Provider Model (Figure 4.2).**
Licensed and Unlicensed Gangmaster Sectors 78200 - Temporary employment agency activities Free movement or circulation of workers in the remit of the GLAA	**Unfettered access on goods NI to GB, with Certification requirements but "commodity codes for each movement do not apply for internal UK trade" from GB to NI** **Gaps and changes to legislation (See Figure 1.1, Appendix 1.1)** **GLAA licensed gangmaster paymaster Managed Services Provider Model (Figure 4.2).**
Licensed and Unlicensed Gangmaster Sectors 78200 - Temporary employment agency activities	**The Windsor Framework: a new way forward (HM Government, 2023, February, p. 8) Article 12 provides for the ability of goods deemed 'not at risk' to freely circulate from the EU into and around the UK confirming "inputs into food production will continue to benefit from inclusion in the 'not at risk' definition" (HM Government, 2023, February, p. 8)** **Gaps and changes to legislation (See Figure 1.1, Appendix 1.1)**

Free movement or circulation of workers in the remit of the GLAA	**GLAA licensed gangmaster paymaster Managed Services Provider Model (Figure 4.2)**

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Gangmasters
Licensing Authority

GLA Brief

Issue 42 – October 2015
When to issue a P45 and
Registration under the Data Protection Act

This Brief explains when a licence holder should issue a P45 to a worker. It also provides guidance regarding the duty to register with the Information Commissioner's Office (ICO) under the Data Protection Act 1998. This guidance is in force with immediate effect.

When to issue a P45

Licence holders are expected to ensure that their worker database is cleansed regularly so that workers do not remain 'on the books' when they are no longer working for a licence holder and have not done so for some time.

The GLA is aware that this is a particular issue in relation to workers who register for work with several licence holders (or other agencies outside of the regulated sector) simultaneously and may not notify each of those licence holders or agencies if they are no longer available for work. Regular database cleansing should ensure that such workers are identified and, if the licence holder has 'ceased to employ' the worker, a P45 should be issued promptly.

When will the licence holder have 'ceased to employ' the worker?

The GLA expects licence holders to comply with HMRC regulations. A licence holder will 'cease to employ' a worker either:

- at the end of the relationship between the licence holder and the worker; or
- at the end of the period of three months during which the licence holder makes no relevant payments to the worker.

Issuing a P45 and payment in lieu of outstanding holiday pay

When a licence holder has ceased to employ a worker they should complete a P45 for a leaver on the day that the worker leaves or, if this is not possible, without 'unreasonable delay'. Producing the P45 at the next monthly payroll is considered to be without unreasonable delay. The GLA therefore expects licence holders to carry out regular

worker database cleansing in order to ensure that P45s are issued promptly as required. All payments due on the issuing of a P45 must be paid to the worker, including, if the worker has accrued untaken holiday entitlement, payment in lieu in accordance with regulation 14 of the Working Time Regulations 1998.

Registration under the Data Protection Act

The Data Protection Act 1998 requires every organisation that processes personal information to register with the ICO unless it is exempt from doing so. The duty applies to both companies and sole traders and licence holders are expected to have ascertained whether they need to register and, if so, to have registered.

More details about registration can be found on the ICO's website at https://ico.org.uk/forhttps://ico.org.uk/for-organisations/register/organisations/register/. The website includes a short self-assessment test designed to assist organisations in ascertaining whether they need to register.

Further information

1. This Brief is intended as a general guide. We recommend you contact the GLA for specific advice if you are unsure of what this guidance means for you.

2. If you have any questions about this Brief, please contact the GLA helpline on 0345 602 5020 or email licensing@gla.gsi.gov.uk.

3. For the latest news and updates from the GLA:

   Twitter: @UK_Gla

   facebook: www.facebook.com/GangmastersLicensingAuthority

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