

Leicester
City Council

**Meeting of the Economic Development, Transport and Climate
Emergency Scrutiny Commission**

DATE: Wednesday, 23 April 2025
TIME: 5:30 pm,
PLACE: Meeting Room G.01, Ground Floor, City Hall, 115 Charles Street,
Leicester, LE1 1FZ

Members of the Committee:

Councillor Waddington (Chair)
Councillor Dr Barton (Vice-Chair)

Councillors Bajaj, Batool, Osman, Porter, Rae Bhatia and Singh Sangha

Members of the Committee are summoned to attend the above meeting to consider the items of business listed overleaf.

For Monitoring Officer

Officer contact:

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Further information

If you have any queries about any of the above or the business to be discussed, please contact: **Julie Bryant - Governance Services Officer** (julie.bryant@leicester.gov.uk) or **Ed Brown - Senior Governance Services Officer** (edmund.brown@leicester.gov.uk). Alternatively, email committees@leicester.gov.uk, or call in at City Hall.

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PUBLIC SESSION

AGENDA

FIRE / EMERGENCY EVACUATION

If the emergency alarm sounds, you must evacuate the building immediately by the nearest available fire exit and proceed to the area outside the Ramada Encore Hotel on Charles Street as directed by Governance Services staff. Further instructions will then be given.

1. Welcome and Apologies for Absence

To issue a welcome to those present, and to confirm if there are any apologies for absence.

2. Declarations of Interest

Members are asked to declare any interests they may have in the business to be discussed on the agenda.

3. Minutes of the Previous Meeting

[Appendix A](#)
(Pages 1 - 16)

The minutes of the meeting of the Economic Development, Transport and Climate Emergency Scrutiny Commission held on 12 March 2025 have been circulated, and Members will be asked to confirm them as a correct record.

4. Chair's Announcements

The Chair is invited to make any announcements as they see fit.

5. Questions, Representations and Statements of Case

Any questions, representations and statements of case submitted in accordance with the Council's procedures will be reported.

6. Petitions

Any petitions received in accordance with Council procedures will be reported.

7. Worker Exploitation Task Group - Report and Recommendations

[Appendix B](#)
(Pages 17 - 108)

The Chair of the task group submits a report examining worker exploitation in Leicester. The Commission will be asked to note the report and support the recommendations set out in section 1.3 of the report.

8. Call-in - Parking Fees and Charges

[Appendix C](#)

(Pages 109 - 126)

An Executive decision taken by the City Mayor on 25 March 2025 relating to increasing parking charges has been the subject of a 6-member call-in under the procedures at Rule 12 of Part 4D, City Mayor and Executive Procedure Rules, of the Council's Constitution.

The Committee is recommended to either:

- a) Note the report without further comment or recommendation. *(If the report is noted the process continues and the call in will be considered at a future meeting of Full Council); or*
- b) Comment on the specific issues raised by the call-in. *(If comments are made the process continues and the comments and call in will be considered at a future meeting of Full Council); or*
- c) Resolve that the call-in be withdrawn *(If the committee wish for there to be no further action on the call-in, then they must actively withdraw it. If withdrawal is agreed the call-in process stops, the call-in will not be considered at a future meeting of Full Council and the original decision takes immediate affect without amendment).*

9. Inward Investment and Place Marketing

[Appendix D](#)

(Pages 127 - 158)

The Director of Tourism, Culture, and Inward Investment submits a report updating the Commission on the work of the Place Marketing Team for Leicester and Leicestershire.

10. 24-Hour Bus Lanes - Executive Response.

[Appendix E](#)

(Pages 159 - 160)

The Chair of the Economic Development, Transport and Climate Emergency Scrutiny Committee will provide an update on the Executive response to the 24-Hour Bus Lanes Scrutiny review report.

11. 20mph Programme Update

[Appendix F](#)

(Pages 161 - 174)

The City Transport Director submits a report to provide members of the commission with an update on the progress of the City's 20mph programme, and to provide members of the commission with details on the next phases of the City's 20mph programme.

12. Local Cycling and Walking Infrastructure Plan

[Appendix G](#)

(Pages 175 - 194)

The City Transport Director submits a report to provide members of the commission with details on the proposed Local Cycling and Walking Infrastructure Plan and to make members of the commission aware of the forthcoming consultation, and provide details for how they may contribute to the plan.

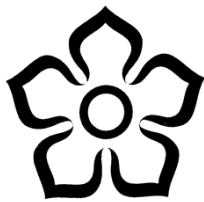
13. Work Programme

[Appendix H](#)

(Pages 195 - 200)

Members of the Commission will be asked to consider the work programme and make suggestions for additional items as it considers necessary.

14. Any Other Business



Leicester
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Appendix A

Minutes of the Meeting of the
ECONOMIC DEVELOPMENT, TRANSPORT AND CLIMATE EMERGENCY
SCRUTINY COMMISSION

Held: WEDNESDAY, 12 MARCH 2025 at 5:30 pm

P R E S E N T:

Councillor Waddington – Chair
Councillor Dr Barton – Vice Chair

Councillor Bajaj
Councillor Orton
Councillor Whittle

Councillor Batool
Councillor Porter

In Attendance

Deputy City Mayor Councillor Cutkelvin
Assistant City Mayor Councillor Malik
Assistant City Mayor Councillor Whittle

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123. WELCOME AND APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor Singh Sangha.

Apologies for absence were received from Councillor Osman.

Apologies for absence were received from Councillor Rae Bhatia. Councillor Orton would substitute.

Apologies for absence were received from Councillor Batool – she would join online.

124. DECLARATIONS OF INTEREST

Members were asked to declare any interests they may have had in the business to be discussed.

Councillors Batool and Malik declared an interest in the item on the UK Shared Prosperity Fund (UKSPF), they worked for an organisation that received funding from the UKSPF to support projects. They would leave the meeting at the beginning of this item.

125. MINUTES OF THE PREVIOUS MEETING

AGREED:

That the minutes of the meeting of the Economic Development, Transport and Climate Emergency Scrutiny Commission held on 8 January 2025 be confirmed as a correct record.

126. CHAIR'S ANNOUNCEMENTS

The Chair reminded public present that they were there to observe, other than the member of the public who had submitted a question and statement.

The Chair announced that there would be a short break to allow for those observing Ramadan to break fast.

127. QUESTIONS, REPRESENTATIONS AND STATEMENTS OF CASE

The following statement and question was presented to the Commission by Mr Nick Wynd:

Approximately a year ago I read a story that Green Party was trying to get funds

for a kid's park in Clarendon Park as residents were having to fund it themselves. I'm not sure of the outcome of this whether the council have addressed this open space for the public.

In addition to this I highlight the design of the Rally open space, a path has been

put straight through the middle of this instead of widening the old path route.

I was invited to help save Tudor Rally adventure playground along with eight other kids play schemes via a protest. I'm glad to see with the pressure placed on the council they backed down and have now funded these schemes.

The development plans for Beaumont Park, so another loss of open space.

I invite the other councillors to highlight any other loss of open spaces they have

encountered. I say this as the council's argument for the market to be left as an open space lacks its validity.

The council announced their original proposition for the new market and convinced the traders to move to Green Dragon Square, they demolished the old market then realised this was a great open space for the public. I'm unsure how they didn't realise this before as I have seen three developments in this meeting where they used footage from the air. Why wasn't this utilised for the market, who knows.

I attended a meeting last year where I highlighted to the attendees that I had

seen the Leicester public asking for a larger market/ undercover space. I also voiced this in the last meeting.

In a previous scrutiny meeting it was highlighted that four propositions would be unveiled, this never came to light but in the last meeting I was advised that three

other propositions existed and could be considered. It is unclear but seems that none of these propositions were any bigger for the public to vote on.

The council has agreed with themselves that the 1 proposition they put forward was a success and is now pushing forward to the planning stage. The story was

run by both the BBC and Leicester Live, and in their Facebook groups the council took a right slating over the proposals, very little agreement with the council's proposals.

I posted in a Leicester based Facebook group about the above and proposition that was going to be implemented and got nearly 500 like reacts indicating they agreed the council had not got this right.

I asked two times this year what was happening over the market and got no response, Then the council announced they were pushing on with their plans. It looks like the decision had already been made.

I have spoken to Leicester Media Online who say they have received a lot of objections about the market. They are awaiting a statement from the council before running a new story.

I have been led to believe that the original petition of 10,000 plus signatures cannot be used as an objection to the plans and feel by dragging of heels on this people have started to give up the fight against the council pushing through this proposal.

I feel a bigger option needs to be considered and proposed by the council. Then

the four propositions given to the public to have the final say. I suggest these are also made transparent as to size of stalls, venue etc.

So my question, and so this is documented in black and white.

Because of the above, the lack of support for the proposal I've seen, do you feel

you should continue as planned or that a 4th larger proposition be added and it put to the people of Leicester to vote?

And by a vote, I mean a fully transparent, involving all local media, to make the vote easily accessible to all.

The Chair thanked Mr Wynd for the question and invited an officer to respond.

The Head of Economic Regeneration replied:

- The City Mayor paused the scheme in May 2024 to allow options for the best use of the space to be considered.
- A public consultation ending in December 2024 resulted in 60% of respondents (more than 1000 people) supporting the option to create a major new event space in the heart of the city.
- A decision had not yet been made on the development. Several options had been brought to EDTCE Scrutiny in December 2024, which were still under consideration:
 - Returning to the original proposal, which has the market occupying the bulk of the area in front of the Corn Exchange
 - Keeping the market permanently on Green Dragon Square.
 - Locating the market in the link between Green Dragon Square and Cank Street.
 - Locating the market in front of the Food Hall along with a flexible event space in front of the Corn Exchange
 - Not having a market at all
- Given the support in the public and trader consultation for a market building with a flexible event space in front of the Corn Exchange, the project team were developing this design further.
- New designs, planning applications and detailed costs would now be drawn up, before a decision can be taken.
- The City Mayor has continued to meet with market trader representatives several times throughout this process and would continue to do so.
- It was agreed that the final option should be undercover, including a roof to protect traders from the weather.
- The petition referenced by My Wynd had not been submitted. Any petitions presented would be dealt with in line with the Council's published petitions scheme, including any exclusions.
- Subject to planning permission, work could start on site from the summer of 2025.

In response to a supplementary question about the size and use of space in the proposed plans, the Head of Economic Regeneration noted:

- The consultation had resulted in a range of constructive suggestions for how the market could be improved.
- It was recognised that this was an uncertain time for traders and the aim was to build a stronger, more vibrant market that attracts higher footfall and enhances the market's long-term sustainability.
- Some market traders had stated their intention to retire or close their business, and several unit traders were keen to find a different trading location within the city centre, and work continued to assist with this.
- Regarding stall design, it was vital to ensure that they were fit for purpose. Traders would be consulted on the design of the stalls during the process.
- Flexibility was a key consideration to allow for speciality markets and

other events.

128. PETITIONS

The Monitoring Officer reported that none had been received.

129. MARKET PLACE UPDATE

The Head of Economic Regeneration gave a verbal update on the market place development plans. Key points to notes were as follows:

- As detailed above, development options had come to EDTCE scrutiny in December 2024, but a formal decision had not yet been made.
- The public consultation was completed with 1667 responses.
- 60% of respondents were in support of the proposal for the market being located in front of the food hall along with a flexible space for events and activities.
- There had been a broad range of comments which would be taken into consideration, and these had been grouped into themes. The most frequent comment – made by 347 people – was that the proposed option would be a “Great redevelopment of the market; It’s a great idea to redevelop the market, utilising the space for a mix of market activities, events, and festivals. Leicester needs an attractive and thriving market to boost footfall to the city centre.”
- A range of other comments were predominantly positive and mentioned the history/heritage of the market, increasing greenery in the space, and several constructive suggestions were made about the need to tackle anti-social behaviour, parking, transport and other operational matters.
- An ongoing dialogue would continue with market traders throughout the process. It was recognised that there was a range of different trader preferences and requirements, some for example were receptive to operating from alternative premises in the city centre. There were currently 23 vacant city centre properties and details of these were being shared with traders.
- The City Mayor had met with trader representatives prior to the press release on the 13th February, and had offered a further meeting if traders would like, and they had been encouraged to bring ideas and suggestions.
- The traders were keen to return to their original location but had advised that they may not require the same amount of space as previously held. They had highlighted the potential for the remaining space being used flexibly.
- Designs, planning applications and costing were being developed further before a decision could be made.

The Chair reminded the committee that a special EDTCE Scrutiny meeting had

taken place to discuss the future of the market, and 3 key issues had been raised:

- Provision for dry goods traders.
- The design of the building.
- The location of the market.

The Chair requested that these matters would be taken into consideration.

The Chair noted that if a petition were to be submitted this could be considered by the Committee.

In response to questions, it was noted that:

- Previous scrutiny comments had been brought to the attention of the City Mayor and many valid points would be considered going forward to inform the development.
- Aesthetics had been of consideration when developing plans, whilst balancing the trader requirements.
- Regarding timescale, a planning application would be made for the open square, and this was expected in the next few months. The market building would take more time to design so a planning application was anticipated for July 2025. If the scheme proceeded at that point, work could commence later in the summer, with completion anticipated by late 2026. The final programme would be confirmed in due course.
- The market would continue to operate from Green Dragon Square throughout this time with continued rental discounts for market traders.
- More than 1000 people had commented during the public consultation.
- Money for the scheme had already been ringfenced, but detailed costings were being developed further.
- Revenue cost to operate the redeveloped market would be calculated, and an update would come once the best way to operate the market had been established.
- A copy of the consultation could be provided.
- Four unit traders had expressed a desire to retire. 6 unit traders had expressed an interest in operating from other premises in the city centre, and there was an ongoing dialogue to support traders.
- Management of anti-social behaviour could be incorporated into the scheme design by including shutters allowing the market to be closed off out of hours. This issue was currently being addressed with success at Green Dragon Square.
- Current revenue income targets for the market are around £200K but this was increasingly difficult to achieve.

AGREED:

- 1) That the commission note the update.
- 2) A copy of the consultation would be provided
- 3) The next update would include details on the revenue costs to operate the market.

A break was taken during this item so that those observing Ramadan could break fast.

130. UPDATE ON LEICESTER AND LEICESTERSHIRE BUSINESS AND SKILLS PARTNERSHIP

The Chair proposed an agenda variance, bringing forward the item on the Update on Leicester and Leicestershire Business Skills Partnership. The Commission agreed.

The Director of Leicester & Leicestershire Enterprise Partnership (LLEP) gave an overview of the report. Key points to note were as follows:

- Funding had been withdrawn for Local Enterprise Partnerships (LEPs) in the spring budget of 2023, with a termination of funds in April 2024. LEP functions transferred to upper tier local authorities, leading to the creation of LLEP.
- A business board was formed with two key purposes: to represent local businesses in regional decision making, and to work with the local leaders to create a comprehensive strategy. The board included local business representatives and local educational establishments.
- The City Mayor and interim leader held regular meetings with the Chair of the business board.
- The 2 enterprise zones were over 4 sites. The Post LEP arrangements were currently under discussion with City, County and District Councils.
- Enterprise zone implementation groups had been created.
- Skills and Apprenticeships were a key priority in enhancing economic growth.
- Partnership work was vital in securing a robust pipeline, the Employment Hub and FE colleges were working on a number of collaborative endeavours.
- The Career Hub engaged with education providers and employers, to provide help to young people, focussing particularly on the disadvantaged.
- There was a range of projects to support disadvantaged young people, including *Unbox Your Future* and *We discover*, the latter was a SEND research project.
- The Leicester and Leicestershire Careers hub had received additional funding to support pilots and the Hub had become England's first Pilot Logistics Beacon Hub.
- The Business Gateway Growth Hub supported local businesses through various initiatives, including raising awareness of fraud. Future plans included workshops and one-to-one support.
- The East Midlands Create Growth Programme supported creative

businesses and was expected to run until March 2025, but this could be extended to March 2026.

- A green paper had been released by the government in October 2024 on the new Industrial strategy. This was a 10-year plan to provide certainty and stability to businesses looking to invest in high growth sectors. In November, the Leicester Leicestershire Business Skills Partnership (LLBSP) hosted an interactive consultation on the Green Paper with local business leaders, education providers, and key stakeholders to share their insights and priorities.
- A government response had been received on timelines and next steps, this could come back to scrutiny.

In response to questions from the committee, it was noted that:

- The budget of the LLBSP varied. There was previous core funding to LEPS and a sum of money had been provided to manage the transition. A plan was in place to manage this fund until the end of 2026. It was hoped that positive government announcements would come imminently.
- In terms of staffing, some roles had changed. The strategy was to move decision making back to local government.
- VAL represented the voluntary sector.
- There was an urban / rural challenge and representation across the patches was needed.
- Metrics of success were becoming clearer. A business delivery plan would come. By the end of April, a cohesive plan would be published.
- Regarding business engagement, it was hard to engage with all of the necessary groups, but the board should help to improve on this.
- Intelligence could be gained by going out to the businesses and working collaboratively.
- To ensure the skills relevance of the Apprenticeships and T levels, consultations had taken place with local businesses to look at what skills would be needed over the next 5 years. Educational establishments had also been consulted.
- Changes to the apprenticeship LEVI were coming through which were hoped to bring positive changes.
- It was felt that the Government passion to engage with businesses would allow for a model to be created going through to 2028.
- A process was beginning to understand adult skills devolution and more details could come to scrutiny on this.
- A strategy would be formed to better support small business via the Business Hub.
- The Chair of the Business Board was a volunteer so was not in receipt of a wage for this role.
- Money in reserves could be clarified and was currently at around £1.8m.
- Net Zero was a key priority for the LEP. The government industrial strategy would feed in and existing measures would be maintained and developed.

AGREED:

- 1) That the report be noted.
- 2) A response would be given with clarity on timelines from the government.
- 3) Consideration would be given to the rural and urban makeup of the board and an update provided.

131. SKILLS BOOTCAMPS

The Chair proposed an agenda variance, bringing forward the item on the Update on Leicester and Leicestershire Business Skills Partnership. The Commission agreed.

The Director of Tourism, Culture and Inwards Investment submitted a report following on the impact of the pilot year (2023-24) and an update on the 2024-25 programme.

The Head of Adult Education presented the report. Key points to note were:

- The report covered the pilot year of 2023-24 and assessed the situation at the current point in 2024-25.
- In 2023-24 there was a target of 200 participants, of which 198 had enrolled and 155 had completed their course.
- There had been a significant increase in the number of courses in 2024-25, with eleven currently running.
- 30% of the funding was dependent on employment outcomes. Therefore, strong employment links were needed before a bootcamp could be started.
- Bootcamps were offered on Digital Marketing, Construction and Cybersecurity.
- Most County residents enrolled on the Anicca Digital Marketing Bootcamp, whereas most of the other learners were city residents.
- There was good representation based on geography.
- Those participants with pre-existing qualifications ranged from Level 1 qualifications up to degree level. Many graduates wanted to take part to become more employable. This was legitimate through the funding, but not what was expected.
- There would be twelve bootcamps this year, and a broader range of providers and subject areas had been sought. Examples included garment production, sewing and repair, pharmacy, agriculture, solar installation, tutor training (aimed at helping people to teach emerging subjects), environment management and software development.
- This was a more challenging year as there were a range of providers who had not been involved with bootcamps before, and as such, they had struggled in getting up and running.
- A challenge was that funding was allocated on a financial year basis, which meant that there was not much time to set up once funding was

confirmed.

- Funding had now been confirmed for the next financial year and it was hoped to speed up the commissioning process to speed up the start of delivery.
- The most successful programme had been Cyber Security, through which there were strong links with employers such as East Midlands Airport, meaning that good jobs had been secured by participants.

Members were invited to comment and ask questions, Responses were as follows:

- With regards to a query on the utilisation of monies, it was explained that in this year's programme, providers had six months following the end of the course to provide job outcomes. This would typically come later in the programme, so it would not be expected that the money be halfway spent at this point.
- In response to a point made about bootcamps not meeting targets, it was explained that funding was reallocated to those in demand. It was aimed to make this easier to do earlier in the programme in 2025-26.
- The outcomes in the first wave were above the national level of performance. The Department for Education (DfE) were met with to review performance.
- In response to points made about those with pre-existing qualifications, it was clarified that the focus was not on those far away from the labour market, but aimed to upskill those close to the labour market or those in jobs. Additionally, if employers suggested that they had staff that required certain skills, the bootcamps could help with this.
- In terms of identifying skills, work had been done in terms of understanding the economy and had been informed by the Learning Skills Improvement Plan. There was also a bidding process whereby providers needed to give evidence that employers were lined up.
- In terms of the programme being sustainable and scalable, funding was agreed on an annual basis and more funding would be available next year. It was aimed to conduct the programme securely, rather than being too ambitious and too quick, it was aimed to grow the programme incrementally.
- It was aimed to move away from what traditional training partners had done. It was looked to work with real job opportunities and to accelerate this. It was clear that there were opportunities and people could be in a better position, although this might be different across different sectors. It was necessary to start with employers who had jobs to fill.
- In response to a suggestion that courses could be conducted for electricians and gas engineers, it was noted that the bootcamps were

only sixteen weeks long, and such courses would be difficult to complete in this time.

- In response to a query about how people found out about the bootcamps, it was noted that it was down to the providers to do the marketing, this was done through channels such as the Job Centre and through employers. The employment hub website contained offers with signposting from the adult education website. Additionally, people found out through word-of-mouth and through social media.
- In terms of self-employed participants, it was noted that bootcamps could help to turn an idea into a business. Many of those on the Digital marketing bootcamp were sole traders. Bootcamps could help in setting up businesses as well as providing skills.
- The Digital Marketing qualification was Level 5 and internationally recognised. The provider, local organisation Annica Training, could be approached for case studies as examples of what it provided.

The Chair noted that the programme demonstrated that people struggled to get into the labour market despite having qualifications.

AGREED:

- 1) That the report be noted.
- 2) That comments made by members of this commission to be taken into account by the lead officers.
- 3) That Annica Training be approached for case studies as examples of what it provided.

132. UK SHARED PROSPERITY FUND

Councillors Batool and Malik left the meeting prior to this item as they had an interest in the item.

The Director of Tourism, Culture and Inward Investment submitted a report providing an update on the UK Shared Prosperity Fund (UKSPF) programme, including plans for the transition year for 2025-26.

The head of Economic Development presented the report. Key points to note were:

- The UKSPF was brought in by the previous government to replace the EU funding that areas had received prior to Brexit. The funding was significantly less (around 50% less) than that previously received from the EU.
- The UKSPF was a three-year programme and the government had allocated funding for the transition.
- There was £8.8m to spend on the programme and this was backloaded,

reflecting the phasing out of EU funding.

- There was a need to spend money and deliver outcomes for local businesses and people.
- At December 2024, there was £2.8m to spend. Spending needed to be evidenced and then claimed.
- There were 25 projects across the programmes, focused around three areas: Communities & Place, Business Support and People & Skills.
- Seventeen of the projects were delivered by external organisations. Many of these were consortia of different delivery partners, meaning that it involved around 30 organisations overall. These funded both internal projects and externally commissioned projects.
- The UKSPF provided vital support for businesses through advice in relation to sustainability; support around low carbon including decarbonisation plans, dedicated support for black owned businesses and social enterprises and support for manufacturing businesses.
- ESOL support was provided for residents, particularly those who were economically inactive.
- Digital inclusion was supported.
- The impacts would be evidenced by the close of the programme.
- 1638 households had been supported with energy efficiency advice.
- Economically inactive individuals had been supported through organisations which provided basic skills training which complimented the bootcamps, providing Level 1 and 2 qualifications to create a pathway.
- Work had been undertaken to close the programme.
- Less money had been allocated for next year, although Leicester had received 75% of the year three funding, which was higher than the national allocation of 60%. However, this still meant that there was less money to allocate and spend.
- There was a range of internal and external teams waiting to see if they could continue work. A decision had been made to continue projects and delivery, and 80% of the funding to external partners had been allocated, this had been very well received. This would continue across the span of the programme.
- It had been possible to determine priorities and maintain and commission new services to address economic issues faced by the city.

The Chair noted that it was sad to see funding reduced, but it was good that money was going to the grassroots.

AGREED:

- 1) That the report be noted.

133. UKSPF ESOL

The Director of Tourism, Culture and Inward Investment submitted a report for the Commission to consider and comment upon the development of the UKSPF funded ESOL projects in 2024-25.

The Regeneration Programmes & Projects Manager attended the meeting remotely to assist with the discussion.

The Head of Adult Education presented the report. Key points to note were:

- Everyday English focussed on economically inactive individuals who were not currently accessing other ESOL provision due to a lack of eligibility or reluctance or due to asylum seeker status.
- Twin Training focussed on those who were seeking work and/or upskilling.
- Learning had been provided to 487 individuals. This had exceeded the targets set.
- Everyday English offered short coursed both through Council venues and venues of partners.
- Enrichment activities were offered to facilitate practicing English in real-life.
- Wraparound support was provided to help people access all support and opportunities available.
- The partnership was strong, built on a network developed through the Multiply maths project.
- Sessions were offered in which people were encouraged to practice English through doing another practical activity, e.g. cooking.
- The UKSPF had allowed flexibility to deliver less traditional education.
- IT skills were offered alongside ESOL.

Members were invited to comment and ask questions, Responses were as follows:

- In response to a query about the context of the offers it was noted that the intention was to fill the gaps that existing ESOL provision left with a range of models of delivery and locations. This opened up opportunities and added wraparound support to progress into other provision.
- In response to a question about indications of success with regard to boosting employability via Twin Training, it was explained that there was no overall employability outcome target as English was just one element. It was further clarified that there was an employment target for women, and this was on track to be achieved.
- It was clarified that the £275k grant for Everyday English was shared between the organisations involved.
- In response for a request for feedback on the trips to Leicester Museum and Art Gallery and Belgrave Hall, it was noted that following the initial trip, many participants had returned during half term with their children. It was noted that people were going to places in the city that they had

never been to before despite living here.

- In response to a query about whether the programmes could continue with the UKSPF funding reduced to 75%, it was affirmed that a smaller programme could be delivered. Further sources of funding were being looked at.
- In response to a question about the ethnicity of participants, it was noted that those in the category 'other' were from a number of backgrounds.
- In response to a query about the potential for other groups to provide services, it was confirmed that organisations could contact the Council on projects, and that the Council were happy to bring in new partners and make links.

AGREED:

- 1) That the report be noted.
- 2) That comments made by members of this commission to be taken into account by the lead officers.
- 3) That members remain aware of the ESOL programmes.

134. ELECTRIC VEHICLE CHARGING POINTS TASK GROUP - EXECUTIVE RESPONSE

The Chair of the Economic Development, Transport and Climate Emergency Scrutiny Committee gave a verbal update on the Executive response to the Electric Vehicle Charging Scrutiny review report.

The Chair provided a verbal update on the response from the Executive as follows:

- There was much to consider in the Commission's extremely thorough report on electric vehicle charging. The task group had identified the challenges that face us as well as the issues we need to explore.
- In particular, it was right that the Council push back on the Government's targeting of LEVI funding towards street charging. As the report correctly pointed out, street charging was not appropriate or workable in Leicester, with so much of the housing stock being terraced properties.
- A better way forward would be to invest in high power destination charging points, and an interesting discussion had taken place about the possibility of siting these at public facing council buildings such as libraries, leisure centres and museums.
- Soon officers would bring forward an EV charging strategy which would recommend that the Council focus on delivering charging points that

maximised turnover of users to create as much benefit from the fewest installations. First and foremost these should be located to drive traffic to city council assets.

The Chair invited members to consider the response, and to raise any queries either outside the meeting or at the next meeting of the Commission.

AGREED:

- 1) That the update be noted.

135. WORK PROGRAMME

The work programme was noted.

136. ANY OTHER BUSINESS

There being no further items of urgent business, the meeting finished at 19:59.

Worker Exploitation Task Group – Report and Recommendations.

Culture and Neighbourhoods Scrutiny Commission

Date of meeting: 23 April 2025

Report of the Chair of the Economic Development,
Transport and Climate Emergency Scrutiny
Commission.

Useful information

■ Ward(s) affected: All

■ Report authors: Professor Nik Hammer, Dr Joseph Choonara, Dr Chandrima Roy, Dr Guillaume Willems (University of Leicester).

■ Report version number: 1

1. Summary

1.1 Following proactive work to address concerns of non-compliance in Leicester's garment sector, the City Mayor's Strategic Plan includes a commitment to expand this work to tackle any other sectors which may be blighted by low pay and poor conditions. A Scrutiny led review of worker exploitation across Leicester's labour market was proposed to inform this work.

1.2 Between November 2024 and February 2025, the group met with the following aims:

- Gain an overview of sectors and practices of worker exploitation across the UK
- Develop a picture of the enforcement landscape, in particular as it appears from the perspective of local authorities
- Map key local stakeholders and their intelligence/systems
- On the basis of broad stakeholder consultation, establish where in Leicester worker exploitation is prevalent (e.g. across sectors, business models, communities, etc)
- Recommend, specifically as regards the local authority's remit, avenues to improve a) monitoring, b) compliance, c) remedy for exploited workers

1.3 The findings of the group are set out in the report appended.

2. Recommended actions

2.1 Economic Development, Transport and Climate Emergency Scrutiny Commission is recommended to agree the recommendations of the Task Group to be taken to the Executive for a response set out in Section 1.3 of the report.

3. Scrutiny / stakeholder engagement

3.1 The following stakeholders were engaged over the course of the Task Group:

- Margaret Beels - Director of Labour Market Enforcement
- Leicester City Council (Adult Social Care)
- Leicester City Council (Procurement)
- Leicester City Council (Economic Development)
- HMRC
- Police
- Highfields Centre
- GMB
- Unseen
- Leicester & Districts Trades Union Council

- Health and Safety Executive
- Gangmasters and Labour Abuse Authority
- Crimestoppers UK
- Wesley Hall Community Centre

4. Financial, legal, equalities, climate emergency and other implications

4.1 Financial implications

This report makes recommendations for the Council to take on a role in the co-ordination and support of a local partnership. This would require additional staffing resource, beyond that currently available within existing Council teams. It is anticipated that this would require a *minimum* of 1 FTE officer at a cost in the region of £60k per year (including staffing on-costs). This could be higher, subject to the scale of involvement that is envisaged. The cost of any specific initiatives would need to be considered as they arise and develop.

No funding has been identified to pay for the costs outlined above. Opportunities for grants to support this work should be explored, both by the Council and community organisations.

Signed: Stuart McAvoy – Head of Finance (37 4004)

Dated: 7th April 2025

4.2 Legal implications

There are no specific legal implications.

Signed: Shazmina Ghumra – Principal Lawyer Civil Litigation

Dated: 9th April 2025

4.3 Equalities implications

The Equality Act 2010 provides legal protection against discrimination and harassment, including those that could constitute exploitation. Public authorities also have a duty to eliminate unlawful discrimination and advance equality of opportunity, as outlined in the Public Sector Equality Duty. This paper focuses on worker exploitation in sectors other than the textiles sector and proposed approaches going forward. As the number of people participating in the workforce continues to rise, it is important to ensure that workers employment rights are protected. Exploitation can happen to anyone, whether they are from the UK or abroad. Offenders often target people with vulnerabilities, whether that's down to their personal circumstances, their employment status, their language abilities or something else that isolates them from other people. The report recommendations aim to help the Council to be more proactive in helping to tackle worker exploitation and to work more effectively with other organisations to address the issue across the city. Initiatives that improve our understanding and aim to deliver benefits by enforcing protection of workers from labour market exploitation should lead to positive impacts for people from across many protected characteristics. It is important to ensure that communities and employees are fully aware of their rights and how to seek support should they need it. Engagement with stakeholders and communities should be accessible.

Signed: Equalities Officer, Surinder Singh Ext 37 4148

Dated: 7 April 2025

4.4 Climate Emergency implications

There are no significant climate emergency implications arising directly from the recommendations in this report. However, there is a relationship between worker exploitation and climate change because:

- i. Those suffering workplace exploitation are likely to be experiencing poverty, and there is an established link between poverty and exposure to negative environmental conditions and risks. For example, households living in poverty tend to be more likely to live in more polluted neighbourhoods.
- ii. Households living in poverty are less likely to be able to do anything about the negative environmental impacts on them, such as poor air quality or the risk of flooding to their homes, and are less likely to be able to take steps to reduce their own environmental impact, such as by insulating their homes, due to lack of financial resources.

Therefore, any reduction in worker exploitation leading to reduced poverty could, in the long term, help make those households more resilient to negative impacts of climate change. Similarly, certain steps to tackle climate change, such as securing grant funding for energy efficiency measures to homes of fuel poor households, can help address some of the poverty related symptoms of worker exploitation.

Signed: Duncan Bell, Change Manager (Climate Emergency). Ext. 37 2249.

Dated: 8th April 2025

5.5 Other implications (You will need to have considered other implications in preparing this report. Please indicate which ones apply?)

5. Background information and other papers:

Task Group Report

Appendices

Appendix 1 - Literature Review Presentation
Appendix 2 - Meeting Summary (Meeting 1)
Appendix 3 - Meeting Summary (Meeting 3)
Appendix 4 – Summary of Meeting with Margaret Beels
Appendix 5 - Stakeholder Questionnaire (HSE)
Appendix 6 - Stakeholder Questionnaire (GMB)
Appendix 7 - Stakeholder Questionnaire (Crimestoppers Trust UK)
Appendix 8 - Stakeholder Questionnaire (Wesley Hall)
Appendix 9 - Highfields Centre Report on Labour Market Worker Exploitation
Appendix 10 - Unseen – Care Sector Press Release
Appendix 11 - Modern Slavery Submission (Leicester City Council – Adult Social Care)

Employment rights guides

GMB Union

<https://www.gmb.org.uk/gmb-young-workers/your-rights-at-work>

Labour Behind the Label

<https://labourbehindthelabel.org/order-our-workers-rights-guide/> available in English, Gujarati, Punjabi and Bulgarian

TUC

<https://www.tuc.org.uk/research-analysis/reports/working-uk-guide-your-rights>

ACAS

<https://www.acas.org.uk/advice>

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Economic Development, Transportation and Climate Emergency Scrutiny Commission

Members:

Cllr Waddington (Chair),

Cllrs Aldred, Bajaj, Chauhan, Haq, Singh Sangha.

Evidence:

Margaret Beels

Annette Forbes, Bernice Lynch – Leicester City Council (Adult Social Care)

Andrew Button – Leicester City Council (Procurement)

Peter Chandler – Leicester City Council (Economic Development)

Representatives from HMRC

Jim Hatton – Police

Priya Thamotheram, Fatimah Li, Ellias Mussa, Vandna Gohil - Highfields Centre

Cassie Farmer - GMB

Justine Carter - Unseen

Chris Willars - Leicester & Districts Trades Union Council

Lydia Patsalides – Crimestoppers UK (Written submission)

Andrew Hine – GLAA (Written submission)

Amy McAvoy, Anita Rao – Wesley Hall (Written submission)

Barbara Hockey – HSE (Written submission)

Foreword

The following review has been a most important undertaking. Following on from work done to look into exploitation in the garment industry, the importance of looking at wider issues of exploitation has been highlighted, since worker exploitation occurs in a number of sectors and in a number of ways.

Not only does this review address a manifesto commitment, but it is an issue that is prevalent around the world and one that needs addressing. Whilst it is indeed a very widespread issue, it is necessary to consider what can be done locally to address the exploitation of workers within the city.

Worker exploitation itself is a spectrum, ranging from issues such as modern slavery, to under-payment and denial of rights. It is important that the Council looks across this spectrum and considers in depth how the Council can work with other organisations to prevent worker exploitation in the city.

We were fortunate to be able to run this task group in conjunction with the University of Leicester, and I would like to thank Professor Nik Hammer and his colleagues for their research that really helped us to understand the nature of worker exploitation.

I would like to particularly thank the various people and organisations who provided evidence for the group. Those from government organisations, such as the Police, HMRC, the GLAA, the HSE and the ASC department of the Council. Also, those from trade unions, NGOs and from civil society, such as the Highfields Centre, Unseen, GMB, L&DTUC, Crimestoppers and Wesley Hall. Their insights and knowledge were invaluable in helping us understand how exploitation occurs in its different forms and the obstacles to tackling it and helped us to form the recommendations as seen in this report.

We hope this report and the findings and recommendations from it will help the Council to be more proactive in helping to tackle worker exploitation and to work more effectively with other organisations to address the issue across the city.



Councillor Susan Waddington

Chair of Economic Development, Transportation & Climate Emergency Scrutiny Commission

1. Executive Summary

1.1 Aims and objectives

The aim of this report, building on a Scrutiny-led review, is to expand on proactive work under the auspices of the Leicester Labour Market Partnership in the garment sector¹. It informs the City Mayor's Strategic Plan which includes a commitment to tackle any other sectors which may be blighted by low pay and poor conditions. Taking into account the local authority's remit as regards worker exploitation, potential avenues were explored to marshal local intelligence and partnerships in countering worker exploitation, strengthen local labour market enforcement, and support viable business models for economic development.

This broad aim was underpinned by the following objectives:

- gain an overview of sectors and practices of worker exploitation across the UK
- develop a picture of the enforcement landscape, in particular as it appears from the perspective of local authorities
- map key local stakeholders and their intelligence/systems
- on the basis of broad stakeholder consultation, establish where in Leicester worker exploitation is prevalent (e.g. across sectors, business models, communities, etc)
- recommend, specifically as regards the local authority's remit, avenues to improve a) monitoring, b) compliance, c) remedy for exploited workers.

Embracing the spirit of local partnership and collaboration, the review has been conducted under the Civic Universities Partnership for Leicester, Leicestershire and Rutland² and funded by the Council's UK Shared Prosperity Fund programme.

1.2 Background

Structural change in the economy as well as emerging new business models have presented local authorities with considerable challenges over the last decades. Successive waves of outsourcing and the inroads of the online platform economy have distanced local production, services and the management of labour, on the one hand, from the control over delivery as well as control over much of the gains of the key areas of production and service, on the other. For local authorities, this has widened the gap between the responsibility for local economic development and the conditions under which it takes place, and is particularly felt in locally embedded areas of the economy such as food, housing, health services, and transport.³

While local authorities have some responsibilities for economic development, they have few powers in enforcing work and employment standards that underpin economic development. Where they are economic actors themselves, local authorities had to cede control over economic processes as they engaged with more distant contractors (some of which may still be regional as in the case of construction companies or care providers while those within the online platform economy – food

¹ Leicester City Council (2022) Leicester Labour Market Partnership (Textile) Review, November 2020 - March 2022 (Leicester), <https://www.leicester.gov.uk/media/05tnijty/leicester-labour-market-partnership-textile-review-2020-2022.pdf>

² Universities Partnership, <https://universitiespartnership.org/>

³ This report deals with a large part of local production and services of everyday basics, what is often called the 'foundational economy', <https://foundationaleconomy.com/introduction/>; Earle, J., Froud, J., Johal, S. and K. Williams (2018) Foundational economy and foundational politics, *Welsh Economic Review* (26), 38-45, DOI: 10.18573/wer.146

delivery and transport are prime examples – can be truly international). Austerity and budget constraints in key areas have further weakened local authorities' bargaining position with those contractors, pressure that often enough are passed on to workers. While these developments have led to increases in the extent and diverse forms of worker exploitation in often eminently local areas of the economy, local authorities however do not have powers to tackle worker exploitation.

Not having any powers, however, is not the same as not having power and this question of what can a local authority do in the current context forms the background of the present review:

- what is the extent of worker exploitation in Leicester's labour market?
- what are the key enforcement agencies and labour market intermediaries with access to workers at risk of exploitation?
- what initiatives could the local authority take in order to improve monitoring, compliance, and remedy for exploited workers?

Attempts to develop a picture of local labour markets, focal points of exploitation, and enforcement tend to be hampered by two key aspects. First, official statistics might be too crude to support focused actionable measures while, second, enforcement powers rest at the national level. As such an evidence base will be important to inform any role for the Council in responding to these issues, as will be viable forms of collaboration with appropriate partners. Those partners are, in fact, crucial as it is them who possess – to varying degrees – detailed intelligence of worker exploitation, enforcement powers, trust and expertise within specific sectors and communities, and, in particular, access to workers at risk of exploitation.

A central part of this Scrutiny-led review, therefore was to identify key labour market stakeholders and to draw on their hands-on knowledge of worker exploitation. Equally, the approach most suited to fill gaps within national enforcement practices, to add a 'fair work' approach from a local perspective, very much rests on a local stakeholder model to labour market enforcement.

1.3 Recommendations

A local 'Fair Work' labour market partnership

1. Establish a local Fair Work Labour Market Partnership to provide leadership on the recommendations below: to focus on systemic change through partnerships with agencies and local stakeholders; to include community organisations that are engaged with people at risk of exploitation at work. The Local Authority should play an active role in coordinating this.
 - a. This would need to be a partnership with a different focus to the Community Safety partnership. Consideration could be given to re-establishing the Labour Market Partnership (with a wider remit to cover wider areas of employment).
2. To ensure that LCC has a relationship with the new Fair Work Agency that has been proposed in the government's Employment Rights Bill.

Supporting workers

3. Work with local partners to establish low-barrier and multi-issue 'fair work' points of support for workers at risk of exploitation.
 - a. In order for information campaigns to be effective, workers need to be able to access support they trust.

- b. While exploitation at work might be the root problem, workers might find it easier to first open up about a range of other issues – food poverty, housing, etc. This can be an important avenue to establish trust, not only with individuals but the wider community.
 - c. This could be delivered through established community organisation in priority areas.⁴
 - d. The Council should support the aforementioned organisations in gaining resources for their work to build on what they have been doing.
- 4. Online Platform Workers - Develop/support one 'fair work' point of support (e.g. with a trade union or worker body) to build specific expertise in supporting online platform economy workers (sometimes known as gig economy workers).
 - a. The issues gig economy workers face are quite specific (amongst others stemming from their classification as workers or self-employed), most likely making a tailored partnership more appropriate.
- 5. Care Workers - Establish a partnership between LCC, trade unions, and social care providers to improve work and employment conditions while at the same time combating labour shortages.
 - a. Such a partnership/agreement could follow the example of the Charter between Salford Council and UNISON where the Council became the 'employer of last resort'.
 - b. At the core would be a win-win link that drives up standards, reduces turnover in skilled care workers, and offers employment to local care workers while reducing the threat of being undercut through unscrupulous visa sponsors.
- 6. Align and expand ESOL provision with work and employment advice within community organisations and across the city.
 - a. ESOL can be an effective entry point to establish trust with organisations that can also provide support on work and employment issues.
- 7. Develop information campaigns through foodbanks, community organisations, places of worship, employers, job fairs, training providers, schools, colleges, etc. This can send out a clear message about workers' rights. Information could be produced in different languages so as to increase access. QR codes could also be used to disseminate information.

Delivery

- 8. Designate an LCC 'Fair Work' officer for coordination and support. Specifically, to
 - a. provide a link between the local authority, community organisations, trade unions, and sector specific initiatives;
 - b. develop links with partners (trade unions, NGOs, civil society partners) in other sectors at risk (e.g. construction, nail bars);
 - c. encourage partnership working between the local initiatives and the labour market enforcement agencies within the Fair Work Agency;

⁴ Different dimensions of deprivation have been mapped across Leicester's neighbourhoods: Leicester City Council (2019) The Indices of Deprivation 2019: Map Pack, <https://www.leicester.gov.uk/media/pkgb4zin/the-indices-of-deprivation-2019-map-pack.pdf>

- d. support partners to secure appropriate funding.
 - i. This would be a route to emulate part of what the Labour Market Partnership was for the garment sector.
 - ii. It would have a crucial function in supporting local partnerships that support workers, on the one hand, and liaise with national enforcement agencies, on the other hand. Note, these enforcement agencies rely on local intelligence; thus, liaising and providing intelligence allows to draw on the resources of those agencies.
- 9. Integrate the above local fair work recommendations with other local authority functions (e.g. Trading Standards, Adult Social Care, Adult Education, Schools, Economic Development and Community Safety) in building partnerships and outreach.
- 10. Review procurement and commissioning processes within the local authority with a view to integrate and monitor work and employment standards in supply chain due diligence.

2 Review findings

A review of worker exploitation and the role of local authorities necessarily encounters a wide range of policy areas that are defined and executed at the national level. The implications of collective bargaining, the definitions of employment status, the work and organisation of enforcement agencies, as well as more sector- or locally-based aspects such as the health and social care visa route, Operation Tacit within Leicester's garment industry, or budgetary constraints have been discussed numerous times during this review. Some of these areas will see significant changes, as presently debated with regard to the Employment Rights Bill in Parliament, with implications for the way local authorities can engage with worker exploitation.

It is striking that local authorities have a role in economic development but lack any formal role in labour market enforcement. Local authorities, in this sense, are pushed into a situation where protection services are left to deal with the fall-out from broken enforcement, even though local actors might often be better placed to understand local labour markets and have closer relations to relevant local stakeholders. A key question in this respect is how local authorities can go beyond occasional voluntary partnerships such as Leicester's garment-sector focused Labour Market Partnership and, for example, play an active and integral part of the Fair Work agenda.

Not having any formal powers, however, does not mean that local authorities have no power to address worker exploitation. This review highlights that, on the contrary, local authorities have unique capabilities to build appropriate partnerships that are tailored to focal problems, to gather relevant and robust intelligence, to support local suppliers and workers in a comprehensive way – that is, aspects that go beyond the strictly defined remit of national enforcement agencies.

Partnerships between the local authority, enforcement agencies and local stakeholders such as trade unions and community organisations will be central in tackling the '*enforcement gap*', that is, the gap between the number of workers thought to be exploited, on the one hand, and those being able to challenge and remedy that exploitation. The review has learned about the extent and details of this enforcement gap which is considerable, both at national as well as local level. There were numerous examples that suggested that partnerships, not only between government enforcement agencies but also with trade unions, NGOs, and community organisations, that is those with access to and trust of workers at risk of exploitation, will be central in bridging that enforcement gap⁵.

This holds even more as the review learned that government enforcement agencies are largely *intelligence-led*, suggesting that there need to be robust and reliable paths to such intelligence in order for labour market enforcement to be effective. Testimonies from organisations with a grassroots presence often indicate greater and more systemic levels of worker exploitation than what is picked up through formal channels. While trade unions and community organisations have intelligence, access and know-how to appropriately deal with different degrees of worker exploitation, any sustained partnership with established enforcement agencies will need to overcome the tensions and overlaps between worker rights and immigration status.

Taking into account the specific structures of subcontracting in supply chains and the varied forms of precarious, at times bogus, employment, it became evident that different sectors require different approaches.

⁵ This is also taken up as a recommendation by the Director of Labour Market Enforcement's most recent strategy: United Kingdom Labour Market Enforcement Strategy 2024/25, p.19, <https://assets.publishing.service.gov.uk/media/67333fe1c10bb403d96bf2b9/uk-labour-market-enforcement-strategy-2024-25-print.pdf>

In the social care sector, for example, the local authority is involved in the supply chain and was very engaged in monitoring suppliers and workers, as well as in supporting them when particular problems became apparent. To some extent, this was made possible due to extensive inter-agency collaboration with relevant actors in the care sector. That sector, however, is known for a range of fairly distinct care settings and the local authority, for example, contracts with only 35 out of more than 200 homecare providers in Leicester.

Thus, there is a question to what extent a robust monitoring process can be developed that takes into account different forms of contracting, recruitment channels, management systems, etc. within social care. Given that labour supply is a critical issue in the sector, a closer collaboration with trade unions might be an effective instrument to create a win-win situation. The North West Migrant Social Care Worker Charter between UNISON and Salford Council can serve as a guide for other local authorities⁶. This might also be useful in the light of efforts at national level to implement collective bargaining and Fair Pay Agreements in the sector.

Procurement and licensing are important areas of local authority control. In order for them to be more effective in carrying out due diligence on worker exploitation, however, these processes will need to be strengthened significantly. Monitoring and enforcement of fair work principles in procurement will benefit from adopting the relevant standards and processes from the Fair Work Wales and Fair Work Scotland frameworks⁷. As it stands, due diligence in procurement and licensing suffer from standard issues of social compliance processes: they often rely on self-reporting; neither the contractor nor the commissioner have the skills and capacity to monitor work and employment standards; both have conflicts of interest as they try to meet budget constraints as well as quality standards.

The online platform/gig economy is a key area that is, both, very diverse and evolving rapidly. Most prominent, at the moment, are taxi licenses as well as a range of delivery services. Whereas local authorities might have some leverage when it comes to licensing, this might be more difficult in delivery. It is important, however, to consider two aspects: first, given reports from elsewhere as well as evidence to the review, the gig economy contains a large number of workers at risk of exploitation, that is, workers who will benefit from low-barrier support on employment and welfare issues. Second, it will be important to stay engaged with the practices of online platform companies, possibly in collaboration with local authorities across the region, as these business models tend to drive down local conditions while capturing profits outside the locality. Taking into account the specific expertise required around the employment relationship of online platform workers, a comprehensive approach (noting the approach by FAB-L/Highfields Centre) seems appropriate in this case.

In contrast to the above approaches that aim to tackle problems ‘from above’, a *comprehensive ‘bottom-up’ approach* is crucial to support workers at risk of exploitation. The Fashion Advice Bureau-Leicester (FAB-L)/Highfields Centre and Wesley Hall approaches stands out in this respect, due to their comprehensive perspective as regards the issues covered, as well as their partnerships

⁶ <https://www.unison.org.uk/content/uploads/2024/10/North-West-Migrant-Social-Care-Worker-Charter-Final.pdf>

⁷ See for example the ‘Code of Practice. Ethical Employment in Supply Chains’ by the Welsh Government, <https://www.gov.wales/sites/default/files/publications/2019-09/code-of-practice-ethical-employment-in-supply-chains.pdf>; the ‘Social Partnership and Public Procurement (Wales) Act 2023’, <https://www.gov.wales/social-partnership-and-public-procurement-wales-act>; and ‘Fair Work and Procurement’ by the Scottish Government, <https://www.gov.scot/policies/public-sector-procurement/fair-work-in-procurement/>

with the GMB trade union and leading brands in the garment industry. This approach does not isolate and compartmentalise different aspects of vulnerable workers' lives.

Much of the foregoing evidence highlights that problems with pay rates and hours very quickly stretch to problems with rent and other costs of daily life. Thus, an approach such as FAB-L/Highfields Centre's that focuses on trust, skills, employability, housing, benefits – as well as wages – is powerful as it links access, support and empowerment, monitoring, and enforcement. Aspects of such approaches could be delivered in partnerships between community organisations and trade unions for other parts of the city too.

Finally, particularly as formal powers are dispersed, as industry structures and worker vulnerabilities are very diverse, *strategic leadership and coordination* will no doubt be crucial in tackling worker exploitation. It will be useful to develop a coherent vision of work and employment standards – e.g. around Fair Work standards – as well as a process of putting them into practice, of monitoring and enforcing them – for example, through a range of partnerships that work through different levers, from local authority-trade union charters, to the access and support community organisations can provide. Local authority leadership and coordination will help to ensure effective learning across different contexts and areas of the city, and to secure resources for local initiatives and partnerships. In many ways, this is a key route for the local authority to give local legs to the Fair Work Framework.

3. Report

3.1 Rationale

Following proactive work to address concerns of non-compliance in Leicester's garment sector, the City Mayor's Strategic Plan includes a commitment to expand this work to tackle any other sectors which may be blighted by low pay and poor conditions. A Scrutiny led review of worker exploitation across Leicester's labour market was proposed to inform this work.

3.2 Approach

In order to contextualise worker exploitation from the perspective of a local authority, an overview was first developed of sectors and practices of worker exploitation across the UK. In an important next step, a picture of the enforcement landscape was developed, in particular as it appears from the perspective of local authorities. This is where a gap was expected to open up, a gap between the local incidence of worker exploitation and the formal powers of local authorities to address worker exploitation.

It was therefore considered useful to map key local stakeholders and their intelligence. The aim was, on the basis of broad stakeholder consultation, to get a better sense of where in Leicester worker exploitation is prevalent (e.g. across sectors, business models, communities, etc). The focus here was less on intelligence that would be considered actionable by enforcement agencies but information about the extent and form of worker exploitation by actors that operate and are embedded locally. This information forms the basis of the recommendations which aim to specifically take into account the local authority's remit, looking to improve a) monitoring, b) compliance, c) remedy for exploited workers.

The following sections of this review contain a brief review of the literature to establish a baseline of worker exploitation and the enforcement landscape in the UK (Section 3.3) followed by the evidence key stakeholder witnesses have given to the Scrutiny commission (Section 3.4). The review findings can be found in Section 2 and draw on the Section 3, that is, debates on worker exploitation and labour market enforcement in the UK as well as the evidence submitted to this review, and identifies potential avenues for the local authority to counter worker exploitation, take a lead in local partnerships, and strengthen its role in labour market enforcement

3.3 Worker Exploitation and Enforcement: The picture across the UK

3.3.1 Worker exploitation

Worker exploitation needs to be seen as a multi-faceted phenomenon, a spectrum, that goes far beyond pay and conditions. For the purposes of this review, worker exploitation is considered to consist of violations of national or international minimum standards that impact workers as well as practices that underpin violations of those norms. This can occur along the following lines:

- contract (formal as well as informal employment, part-time, (bogus) self-employment, zero-hours),
- pay (monthly, hourly, overtime, bonuses, deductions), lack of holiday and/or sick pay,
- working time (total hours, guaranteed hours, scheduling, shifts),
- working conditions (training, health and safety),

- discrimination, bullying and harassment,
- gender,
- citizenship and ethnicity,
- visa and right to work status
- modern slavery

The intersection of such factors impacts on workers' ability to organise collectively, their individual ability to move across jobs, sectors, different areas of the country, as well as their ability to access any remedies. While these factors are not simply additive, they do compound workers' vulnerabilities. Equally, worker exploitation is not simply a result of worker characteristics, rather, it needs to be seen as an outcome in the context of wider business, management and regulatory practices.

The broader austerity policies over the last decade have increased workers' vulnerabilities and increased the share of insecure employment. The Taylor Review of Modern Working Practices acknowledged problems related to precarious employment, problems that seem particularly acute in those parts of the economy that are characterised by fragmentation (subcontracting, franchising, gig economy workers, bogus self-employment, see below)⁸.

An analysis of government data by the Trades Union Congress (TUC), for example, showed that the number of insecure jobs has risen to 3.7 million people in 2022, up from 3.6 million the year before. These strains can also be seen in increasing demands on food banks which are particularly concerning as 5.2 million people who face hunger and hardship live in households where at least one person is working.

The actual extent of worker exploitation in the UK remains difficult to assess and depends on the methods used. An important reference study conducted by the Resolution Foundation, however, provides sound estimates that non-compliance with work and employment regulations in the UK is pervasive (see Table 1).

Table 1: Evidence of widespread non-compliance with UK employment laws

Estimated scale of labour market violations: GB/UK, various dates

	Estimated scale of the issue	Estimated number of people affected
National Minimum Wage/National Living Wage underpayment	32 per cent of employees aged 25+ at the wage floor (2022)	400,000
No paid holiday entitlement	3 per cent of employees (Q4 2022)	900,000
Not provided with a pay slip	7 per cent of employees (2019-20)	1.8 million

⁸ See also Judge, H. and Slaughter (2023) Enforce for good. Effectively enforcing labour market rights in the 2020s and beyond (Resolution Foundation), <https://www.resolutionfoundation.org/app/uploads/2023/04/Enforce-for-good.pdf>; DLME (2024) United Kingdom Labour Market Enforcement Strategy 2024/25, <https://assets.publishing.service.gov.uk/media/67333fe1c10bb403d96bf2b9/uk-labour-market-enforcement-strategy-2024-25-print.pdf>; Low Pay Commission (2023) Compliance and enforcement of the National Minimum Wage. A report by the Low Pay Commission, https://assets.publishing.service.gov.uk/media/65004e0657278000142519c1/NC_report_2023_final.pdf

Not auto-enrolled into a pension scheme	3 per cent of eligible employees	600,000
Firm-reported fatal and non-fatal injuries at work	0.2 per cent of all in employment (2021-22)	60,000
Worker-reported workplace accident or injury in the past 12 months	2 per cent of people who have worked in the past 12 months (Q1 2022)	400,000
Reported workplace discrimination in the past 12 months	20 per cent of working-age adults (September 2022)	8.3 million

Source: Judge, H. and Slaughter (2023) Enforce for good. Effectively enforcing labour market rights in the 2020s and beyond (Resolution Foundation),

<https://www.resolutionfoundation.org/app/uploads/2023/04/Enforce-for-good.pdf>

A major challenge in labour market enforcement stems from the emergence of new business models that redistribute gains upwards (to lead firms at the top of the supply chain) and the risks of exploitative work downwards (to vulnerable workers), leaving local authorities with the consequences of exploitative practices. Across industries, however, we can find widely different structures, such that effective interventions likely have to take into account these specific forms of industry fragmentation, for example in focusing on particular practices or developing tailor-made partnerships⁹.

While power, gains, and risks are distributed differently across sectors¹⁰, the management of labour tends to be dissociated from the source of economic power, shifting responsibility for pay and conditions to subcontractors and workers. The construction and garment industries, for example, are characterised by long subcontracting chains which can be difficult to monitor, while the franchising models in the restaurant and hospitality industry stick to the corporate policies and branding of the lead firm but leave the day-to-day operations and labour management to franchisees. This, again, differs considerably from platform labour – often referred to as ‘gig economy’ – that can be found in transport and food delivery which developed a form of ‘management by algorithm’. There is also a range of small businesses such as nail bars, food and hospitality, (hand) car washes that have a more direct relation to their customers but balance business risks by operating on the border of the informal economy.

In consequence, different forms of industry fragmentation underpin the way work and employment is organised, from ‘bogus’ self-employment in the construction industry to workers in the online platform economy who, in formal terms, buy a ‘service’ from a platform company; from workers sourced through labour intermediaries, those employed through zero-hour contracts, to unauthorised subcontracting.¹¹

Worker exploitation in the health and social care sector highlights how exploitation has been exacerbated by inappropriate policies. Shortages of skilled labour have been building up over more

⁹ Weil, D. (2009) Rethinking the Regulation of Vulnerable Work in the USA: A Sector-Based Approach, *Journal of Industrial Relations* 51(3), 411-430.

¹⁰ Weil, D. (2014) *The fissured workplace: Why work became so bad for so many and what can be done to improve it* (Harvard University Press)

¹¹ Weil, D. (2014) *The fissured workplace: Why work became so bad for so many and what can be done to improve it* (Harvard University Press)

than a decade¹². Even recently, labour shortages, particularly in local authority adult social care, vacancy rates rose from 7.5% to 11.6% from 2020-22, with turnover increasing from 13.6% to 17.1% over the same period.¹³ Particularly adult social care and live-in care are characterised by low pay and poor working conditions. Key problems are National Minimum Wage (NMW) violations, high agency fees, non- or inadequate accounting of travel, stand-by and scheduling, as well as inadequate health and safety.

Many agencies and experts have raised well-founded concerns about modern slavery and forced labour, concerns that were raised by the Joseph Rowntree Foundation more than a decade ago¹⁴. The anti-slavery charity Unseen, for example, saw a 600% increase in cases reported by potential victims of modern slavery in 2022, rising by another 32% in 2023 (in absolute numbers, that is 918 potential victims in the care sector in 2023)¹⁵.

Most importantly, however, the increase in exploitation in the care sector is linked to the system of tied visas, the central plank of the social care visa route, which increase workers' dependency on their employer and limits their voice at work. The health and social care visa route was introduced in August 2020 in order to deal with labour shortages. An independent report¹⁶ highlighted the Home Office's 'shocking' handling of visas, putting care workers at risk of exploitation. In this case, one of the key problems was that the Home Office did not foresee the demand (the number of registered sponsors tripled to 95000 by end of 2023) and did not put appropriate checks in place (e.g. when awarding 275 certificates of sponsorship that did not exist).

This system puts workers at risk of exploitation in the recruitment process, through debt bondage, poor accommodation, and organised immigration crime. Many reports exist about debt bondage in the range of £20,000 where jobs might not even materialise. The Guardian, for example reported on a case where dozens of Indian care workers paid the above sum to intermediaries but did not get a single hour of work¹⁷. A recent study by the Work Rights Centre¹⁸ found that in the period 2020 - July 2024, 177 care companies who have a sponsorship licence to recruit migrant care workers have accumulated 250 labour rights violations. These violations, tracked through the Violation Tracker UK database, concern only Employment Tribunal decisions, that is, a small share of exploitative working practices. Still, this period saw 225 cases lost by care companies and orders to pay £6 million in

¹² Skills for Care (2024) The state of the adult social care sector and workforce in England, 2024 (Leeds, 2024), <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/Workforce-intelligence/documents/State-of-the-adult-social-care-sector/The-state-of-the-adult-social-care-sector-and-workforce-in-England-2024.pdf>

¹³ Samuel, M. (2023) Government quizzes adult social workers on working conditions, <https://www.communitycare.co.uk/2023/08/18/government-quizzes-adult-social-workers-on-working-conditions/>

¹⁴ Allain, J. et al (2013) Forced labour's business models and supply chains (Joseph Rowntree Foundation), <https://www.jrf.org.uk/sites/default/files/migrated/migrated/files/forced-labour-business-full.pdf>

¹⁵ GLAA (2024) Exploitation is on the rise in the care sector, <https://www.gla.gov.uk/whats-new/latest-press-releases/181024-exploitation-is-on-the-rise-in-the-care-sector>

¹⁶ See Emberson, C. (2024) How visas for social care workers may be exacerbating exploitation in the sector, *The Conversation*, <https://theconversation.com/how-visas-for-social-care-workers-may-be-exacerbating-exploitation-in-the-sector-227090>

¹⁷ Stacey, K. and P. Joshi, 2024, <https://www.theguardian.com/society/article/2024/jun/02/he-didnt-have-a-contract-for-me-the-indian-careworkers-who-paid-agents-to-work-in-britain>
also: <https://www.theguardian.com/society/2023/jul/10/uk-care-operators-accused-of-shocking-abuse-of-migrant-workers>

¹⁸ WoRC (2024) The forgotten third: migrant workers' views on improving conditions in England's adult social care sector (Work Rights Centre), <https://www.workrightscentre.org/news/the-forgotten-third-migrant-workers-views-on-improving-conditions-in-englands-adult-social-care-sector>

compensation. A key consequence of sponsor licenses being revoked – between July 2022 and December 2024 the Home Office revoked more than 470 licenses – is that workers are left without a sponsor (affecting more than 39,000 workers during the aforementioned period)¹⁹.

Food and parcel delivery constitute further areas where the regulation and enforcement of work and employment has not kept abreast of disruptive business models. Delivery workers²⁰ have long fought for recognition of their employment status as workers of the large branded platform apps. Instead, they are still seen as gig economy workers – e.g. if working for Deliveroo and Uber Eats – and are paid per delivery which means that their earnings often fall below the NMW. On top, workers are responsible for their own equipment, insurance and maintenance of vehicles and have no access to pension, sick pay, holiday pay, or parental leave.

The ambivalence of the government and platforms is also evident in the – legal – practice of rider substitution, whereby riders rent out space on their apps for others to work on. Whether this comes out of needs to cope economically or is purely organised with exploitative intent – or, in fact, both – is open to question and will always be a blurred area. The practice of renting out space on apps²¹ shows, however, that the robust registration systems of platform brands are not necessarily watertight, allowing children to work as delivery drivers²².

The issue of driver substitution came into the spotlight after the death of a 17-year-old who worked for Deliveroo on a substituted account since he was 15²³. This tragic death at work prompted a number of, equally unsatisfactory, responses. On the one hand, platform companies reminded that “independent, self-employed, driver account holders account-holder are responsible for ensuring their substitute meets the necessary standards”²⁴. On the other hand, the then Home Office’s response contrasted exhortation by publishing an open letter to platform firms (calling for an end to “the use of unchecked substitution” which was seen to “perpetuate and enable illegal working”) with immigration raids. “Over the first three quarters of 2023, over 4,000 immigration enforcement raids have taken place across the UK targeting illegal working, marking a 70 per cent rise on raids completed during the same period in 2022.” In 2023, this has resulted in almost 400 arrests in the food delivery sector²⁵.

¹⁹ Fox, A. (2025) New estimate ‘shows scale of exploitation on Wild West care visa route’, The Independent, <https://www.independent.co.uk/news/uk/home-news/home-office-wild-west-university-of-oxford-seema-malhotra-stephen-kinnock-b2714006.html>

²⁰ Newsome K. and S. Moore (2018) Paying for Free Delivery: Dependent Self-Employment as a Measure of Precarity in Parcel Delivery, *Work, Employment and Society* 32(3), 475-492

²¹ Burgess, S. (2024) <https://inews.co.uk/news/delivery-riders-account-sharing-facebook-black-market-2957089>

²² Crawford, A. (2023) Children working as riders for food delivery apps, <https://www.bbc.co.uk/news/uk-67371473>

²³ Crawford, A. (2023) Children working as riders for food delivery apps, <https://www.bbc.co.uk/news/uk-67371473>

²⁴ Crawford, A. (2023) Children working as riders for food delivery apps, <https://www.bbc.co.uk/news/uk-67371473>

²⁵ Home Office (2023), Illegal Working in the Food Delivery Industry (open letter to Uber Eats, Deliveroo, Just Eat) https://assets.publishing.service.gov.uk/media/655389d43718980013d296b8/Minister_public_letter_to_online_delivery_platforms- FINAL_PDF.pdf

Other parts of the restaurant and food sector have also shown weak due diligence on behalf of leading brands. Modern slavery victims, for example were found at a McDonald's branch in Cambridgeshire as well as in the supply chains of six of the largest UK supermarket chains²⁶. This case shows some common warning signs: here, 16 vulnerable migrants were trafficked to the UK, made to live in unsuitable cramped accommodation and were victims of wage theft by gang members. While their employer paid the appropriate wage rate, a number of the victims' wages were paid into the same bank account, gang members sat in at job interviews, victims worked excessive shifts (e.g. a 30-hour shift, 70 hour weeks), and nine of the victims lived at the same address.

Looking beyond the delivery of food to the actual cooking of meals, so-called 'dark kitchens' constitute a further major disruptor of the food and restaurant industry. In this case, kitchens are established and hired out, away from traditional high-streets, with advantages ranging from shared functions (preparation of ingredients, kitchen technology, back-of-house services such as dishwashing) to cheaper real estate ('converted shipping containers in car parks') and closer proximity to the customer²⁷. This kind of business model promises cuts in the workforce of up to 75% (ibid.) and – organised along Taylorist principles with the entire preparation and cooking removed from the customer's sight – seems ready to draw on a vulnerable workforce, following the downward trend in work and employment conditions of the gig economy²⁸.

What is noticeable across all sectors is that the focus over the last years has not been on the underlying business models and that the immigration/right-to-work controls often seemed to be the most prominent and consequential initiatives. At the same time, enforcement – the monitoring of worker exploitation and access to remedy – has been somewhat relegated.

3.3.2 Enforcement of worker exploitation

A broad perspective on key categories and the scale of enforcement of work and employment violations can be gained from Violation Tracker UK²⁹ (see Table 2). This database compiles information from a range of official data and public agencies on a wide array of corporate violations, from competition, consumer protection, employment, environment, finance, and safety. It thereby also tracks data on the enforcement of employment issues such as breaches of minimum wage regulations, breach of contract, unlawful deduction from wages, working time regulations, unfair dismissal, disability discrimination, Slavery and Trafficking Risk Orders, the removal of license etc. It sources decisions from Employment Tribunals, the Department for Business, Energy & Industrial Strategy, the GLAA, the EHRC.

Table 2: Enforcement of labour standards in the United Kingdom and Leicester, 2020-2024

	United Kingdom ⁱ (Leicester ⁱⁱ)
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²⁶ McLennan, W. et al (2024) McDonald's and supermarkets failed to spot slavery, <https://www.bbc.co.uk/news/articles/c2kdg84zj4wo>

²⁷ Bradshaw, T. (2019) The start-ups building 'dark kitchens' for Uber Eats and Deliveroo, Financial Times, <https://www.ft.com/content/a66619b0-77e4-11e9-be7d-6d846537acab>

²⁸ Giousmpasoglou, C., Ladkin, A. and Marinakou, E., 2023. Worker exploitation in the Gig Economy: the case of Dark Kitchens, *Journal of Hospitality and Tourism Insights*, https://eprints.bournemouth.ac.uk/38224/1/Dark%20Kitchens%20-%20worker%20exploitation_accepted%20paper%20version.PDF

²⁹ Good Jobs First (2024) Violation Tracker UK, <https://violationtrackeruk.goodjobsfirst.org/>

Sector search term ⁱⁱⁱ	All violations	Avg penalty (median)	Labour standards violations	Avg penalty (median)
Nail	12 (0)	1208	8 (0)	710
Nails	16 (0)	1378	9 (0)	1047
Car Wash	171 (0)	0	46 (0)	2776
Carwash	19 (0)	0	1 (0)	4823
Nursing	303 (1)	0	34 (1)	2717
Care	4326 (9)	0 (22711)	717 (2)	2466 (22711)
Healthcare	706 (0)	0 (0)	157 (0)	3450 (11356)
Retirement	93 (0)	500	6 (0)	890
Garments	6 (4)	407 (0)	2 (0)	1765
Apparel	42 (1)	5379 (2671)	25 (1)	10441 (2671)
Fashion	23 (1)	1665 (28810)	17 (0)	1664
Build	286 (0)	0	30 (0)	4041
Builders	1583 (0)	0	17 (0)	3734
Building	2208 (0)	0	98 (0)	3283
Construction	4977 (7)	0 (0)	178 (0)	3054
Delivery	116 (0)	2019	66 (0)	3055
Food	464 (5)	1792 (3244)	196 (3)	2658 (3244)

Source: Source: Good Jobs First (2024) Violation Tracker UK, <https://violationtrackeruk.goodjobsfirst.org/>

Notes: i) For the UK, virtually all labour standards violations in 'nail/nails' include unlawful deductions of wages or non-payment of NMW; 'car wash/carwash' contains a majority of health and safety related violations; penalties in 'apparel' are high as this category includes numerous brands and retailers; a large number of violations in 'delivery' are from the Royal Mail.

ii) For Leicester, the labour standards violation under 'nursing' is a NMW violation; under 'garments', there are in fact, 2 labour standards violations (included in 'all violations'); all violations in 'construction' are health and safety violations.

iii) Due to data being consolidated from a wide range of data sources, Violation Tracker UK is unable to provide standardised sector data. The sector search terms for this table are those that appear from a 'open search', i.e. they can be part of a company's name or stem from a sector descriptor used by an enforcement agency.

An important caveat, however, is that these data by definition only capture violations that have been *successfully prosecuted*. Thus, they do not include unsuccessful proceedings or, even more importantly, issues that have *never resulted* in complaints or prosecutions. In this regard, the data from Violation Tracker UK are extremely useful as they serve to highlight the extent of the enforcement gap, that is, the gap between the estimates of the Resolution Foundation in Table 1 above, the successful prosecutions as evidenced through the Violation Tracker UK in Table 2 (even if the sectors and years underlying those two tables do not overlap), as well as anecdotal evidence in the media and the evidence from witnesses to the Scrutiny review (see below).

Research shows that workers in fragmented industries and low-pay jobs are more likely at risk of exploitation. Work by the Low Pay Commission and Resolution Foundation also highlights that underpayment of the NMW has increased again since 2017 even as NMW rates have risen³⁰. A further glimpse can be gained from statistical data. According to estimates from the Office of National Statistics, 35,000 workers in the East Midlands are paid below the National Minimum Wage. These are not concrete cases, however, but statistical estimates. Beyond such research,

³⁰ Judge, L. and H. Slaughter (2023) Enforce for good. Effectively enforcing labour market rights in the 2020s and beyond (Resolution Foundation), <https://www.resolutionfoundation.org/app/uploads/2023/04/Enforce-for-good.pdf>

qualitative studies that focus on specific places and/or sectors, and build on good access to stakeholders, can give valuable pointers to the hidden extent and precise dynamic of exploitation³¹.

Labour market enforcement in the UK has historically been characterised by its extreme fragmentation, with a number of state enforcement agencies such as the police, GLAA, HMRC, EAS, HSE responsible for key aspects of worker exploitation. Some of those agencies are guided by the Director of Labour Market Enforcement who, in turn, is answerable to, both, the Home Office as well as the Department of Business and Trade. Additionally, there are routes through ACAS and Employment Tribunals.

In a recent key development, the current government has proposed to create a 'Fair Work Agency', that is, a single enforcement body, through its Employment Rights Bill which is currently going through Parliament. The Fair Work Agency would be an executive agency of the Department of Business and Trade and bring together the GLAA, HMRC Minimum Wage Team, and Employment Agency Standards Inspectorate, focusing on existing state enforcement functions, as well as functions relating to holiday pay and statutory sick pay. Given current progress, it is thought that a Fair Work Agency would become operational in 2026.

This institutional fragmentation has compounded developments at other levels³². The last decades, for example have seen a push-back of collective rights and a stronger focus in individual rights. Taken together, the industry fragmentation discussed above, the focus on individual rights, as well as the under-resourcing of enforcement agencies³³ result in larger areas of the labour market with jobs that put workers at the risk of exploitation while, at the same time, enforcement agencies have difficulties in gathering intelligence and workers are unable to pursue their rights³⁴ (for fear of employer reprisals, lack of language skills, lack of alternatives in the labour market; see also the period 2013-2017 when considerable fees were charged to access Employment Tribunals, a discussion that has recently flared up again).

Two key challenges remain, however, for any new enforcement architecture, even if it is extremely well resourced. The first one concerns longstanding tensions between worker rights enforcement, on the one hand, and immigration/right-to-work controls, on the other, with the latter having taken precedence over the last years. This has led to accusations of racial profiling³⁵ which is likely to

³¹ See e.g. Clark, I. and T. Colling (2019) New insights into informal migrant employment: Hand car washes in a mid-sized English city, *Economic and Industrial Democracy* 40(3), 755-775 and Clark, I. and T. Colling (2018) Work in Britain's informal economy: Learning from road-side hand car washes, *British Journal of Industrial Relations* 56(2), 320-341 for hand car washes; WoRC (2024) The forgotten third: migrant workers' views on improving conditions in England's adult social care sector (Work Rights Centre), <https://www.workrightscentre.org/news/the-forgotten-third-migrant-workers-views-on-improving-conditions-in-englands-adult-social-care-sector>; the work of FLEX, <https://labourexploitation.org/>, more generally.

³² Kirby, M., E. Godwin et al (2024) Protecting all we care about. The state of UK regulatory enforcement (Good Jobs First, Unchecked UK), <https://goodjobsfirst.org/protecting-all-we-care-about/>

³³ A former Director of Labour Market Enforcement put the likelihood of an average firm to be visited for minimum wage compliance at once in every 500 years, see <https://committees.parliament.uk/oralevidence/9174/html/>

³⁴ See also Judge, L. and H. Slaughter (2023) Enforce for good. Effectively enforcing labour market rights in the 2020s and beyond (Resolution Foundation), <https://www.resolutionfoundation.org/app/uploads/2023/04/Enforce-for-good.pdf>

³⁵ An IWGB (Independent Workers Union of Great Britain) officer said "We have seen this happen a lot more frequently under the guise of vehicle stops for insurance checks under the Road Traffic Act. ... Many delivery workers feel intimidated by the police, whether due to language barriers, poor knowledge of legal rights, or

increase the vulnerability of exploited workers and presents a serious obstacle of civil society organisations collaborating more substantively with enforcement agencies.

The treatment of food delivery workers in Bristol³⁶ – where poor working conditions, unregulated employment and subcontracting arrangements and, in consequence, poor living conditions – underlined this tension between worker rights and immigration/right-to-work controls in recent immigration raids³⁷. Similar initiatives in London saw 66 delivery riders detained in Home Office raids in the first half of 2023 alone, with 10 of them subsequently deported³⁸. This is problematic as it is the unregulated industry and a broken enforcement system that engendered such conditions in the first place. Furthermore, the focus on undocumented workers is only likely to further cement exploitation in informal sectors of the economy³⁹ and, in consequence create additional problems for local authority protection services.

The second, related, challenge concerns the difficulties of reaching workers at risk of exploitation such that effective enforcement and remediation can be delivered. The spectrum of worker exploitation and varied forms of industry fragmentation highlighted above would point to the need, not only of multi-agency collaboration but, even further, a strong role for trade unions and community organisations. These difficulties are evident even in the social care sector that currently receives most attention. While the Home Office has revoked or suspended the sponsorship licences of over 1,000 companies in 2024, and the GLAA handing out Slavery and Trafficking Risk Orders (one to Leicestershire care home provider in November 2023⁴⁰), these numbers contrast with the scale of worker exploitation indicated through in-depth studies and trade unions' reports⁴¹. Furthermore, while a minimum wage for care workers⁴², backed by collective bargaining and protected through a

previous bad experiences. ... We've heard of multiple cases where police have taken advantage of this fear, with officers reportedly asking for information they have no right to. As a union we aim to make sure all our members know their legal rights and have the correct support when they are unfairly targeted due to racial profiling."

³⁶ Wall, T. (2024) 'I wouldn't wish this on anyone': the food delivery riders living in 'caravan shantytowns' in Bristol, <https://www.theguardian.com/business/article/2024/aug/24/i-wouldnt-wish-this-on-anyone-the-food-delivery-riders-living-in-caravan-shantytowns-in-bristol>

³⁷ Wall, T. (2024) Calls for investigation of Uber Eats and Deliveroo after raid on Bristol caravan camp, <https://www.theguardian.com/business/2024/oct/12/calls-for-investigation-of-uber-eats-and-deliveroo-after-raid-on-bristol-caravan-camp>

³⁸ Burrell, M. (2023) <https://www.standard.co.uk/news/london/deliveroo-uber-eats-just-eat-illegal-workers-home-office-immigration-raid-delivery-rider-b1099423.html>

³⁹ The human rights organisation Anti-Slavery International argues that "The very nature of app-based management means a lack of direct relationship between the worker and the "employer", which can result in long working hours, and low payments where people may end up earning below minimum wage ... Coupled with a lack of sector regulation, high number of workers, and algorithm-controlled targets, the result is that people might be less likely to complain about labour violations. We remain very concerned about the lack of regulation in these industries where we have already seen labour exploitation and abuses taking place." See Burrell, M. (2023) <https://www.standard.co.uk/news/london/deliveroo-uber-eats-just-eat-illegal-workers-home-office-immigration-raid-delivery-rider-b1099423.html>

⁴⁰ GLAA (2023) Owner of Leicestershire care provider handed slavery order, <https://www.gla.gov.uk/whats-new/press-release-archive/24112023-owner-of-leicestershire-care-provider-handed-slavery-order>

⁴¹ Osuh, C. (2024) Union launches charter to protect care workers on sponsored UK visas, The Guardian, 4 Nov 2024, <https://www.theguardian.com/society/2024/nov/04/unison-migrant-care-workers-charter-salford-greater-manchester>; UNISON, n.d., Migrant Care Worker Charter. 7 Steps to Protect Migrant Social Care Workers, <https://www.unison.org.uk/content/uploads/2024/10/North-West-Migrant-Social-Care-Worker-Charter-Final.pdf>

⁴² Merrick, J. (2024) Labour to promise £12-per-hour minimum wage for carers, <https://inews.co.uk/news/politics/labour-12-per-hour-minimum-wage-carers->

Fair Pay Agreement⁴³ is in discussion, there is considerable detail to be decided so that standards can be enjoyed across different contracting arrangements within social care⁴⁴.

Robust enforcement, thus, will rely, both, on effective enforcement institutions as well as wide-ranging appropriate partnerships that can make sure that formal coverage through rights is associated with actual awareness of and access to those rights.

3.4 Worker Exploitation and Enforcement with a Focus on Leicester: Evidence to Scrutiny Review

3.4.1 Worker exploitation

A key observation widely shared throughout the evidence sessions was that the nature of exploitation changes and as a result there are a lot of intelligence gaps. Consequently, it was considered crucial to develop partnerships with actors in relevant sectors and communities.

Witnesses identified the following parts of the economy as particularly at risk of exploitation: the care sector, construction, food delivery, restaurants, hospitality, transport and logistics, the garment industry, retail, corner shops, hand car washes, nail bars.

A difference was made between labour abuse which relates to wage theft, holiday pay, contract issues, etc. versus modern slavery which focuses on human trafficking and slavery, servitude and forced or compulsory labour. While the boundary between worker exploitation and modern slavery can be fluid, the difference was reflected in separate partnerships, monitoring processes and enforcement powers.

The extent of worker exploitation – both, of modern slavery and labour abuse – proved difficult to quantify but was thought to be widespread. Issues in social care have recently been well documented nationally (linked to the visa route and funding constraints) and worker exploitation in the garment sector has been superseded by significant numbers of workers left unemployed as key brands have increased sourcing from abroad. In other sectors, however, such as construction, restaurants, corner shops, nail bars, worker exploitation was perceived to be significant, although it was difficult to get access to more precise data on the issue.

Unseen identified modern slavery in the care sector, hospitality, retail, services, transport and logistics and particularly highlighted the gig economy as a very problematic area as it includes complex sub-contracting arrangements and a transient/temporary workforce. The review was told that Unseen recorded about 20-30 cases of modern slavery labour exploitation in Leicester.

A report by Unseen points to an increase in potential victims of modern slavery in the care sector – 712 potential victims in 2022 – and emphasised how different arrangements around care settings (from funding, contracting to recruitment) influence the risks to workers entering the care sector⁴⁵.

[3104577#:~:text=Every%20care%20worker%20in%20England%20would%20be%20entitled,care%20and%20ease%20the%20burden%20on%20the%20NHS.](#)

⁴³ Labour Party (2024) Labour's plan to make work pay: Delivering a new deal for working people, <https://labour.org.uk/wp-content/uploads/2024/06/MakeWorkPay.pdf>

⁴⁴ Sisson, K. (2024) Introducing sectoral bargaining in adult social care: a matter of the devil in the details, <https://www.buira.net/research/introducing-sectoral-bargaining-in-adult-social-care-a-matter-of-the-devil-in-the-details/>

⁴⁵ https://www.unseenuk.org/wp-content/uploads/2023/11/unseen-Care-Sector-report_spread-2023.pdf

Crimestoppers have done extensive work on raising awareness of signs of exploitation and allow the community to report information anonymously. Nationally, it received 435 reports specifically on modern slavery in 2023, and 325 in 2024.

The GLAA has historically focused on the agriculture sector but has, over the last 4 years, conducted a lot of work in the garment industry (see e.g. Operation Tacit in Leicester). More recently, it has seen an increase in worker exploitation in the care sector. This mainly concerns companies that recruited – and sponsored – workers from overseas who encounter a work environment (excessive hours, overtime not paid, problems with driving in the UK) that was not communicated in the recruitment process.

It was held that the health and social care visa route contributes to workers feeling ‘trapped’ in their situation as they can only work for the nominated sponsor company who then can determine whether they allow them to stay and work or revoke their visa. This only leaves a short window of time for the workers to find new employment or face having to leave the UK despite in numerous cases paying huge, illegal fees to simply gain the opportunity to work in the UK.

The police pointed to specific problems when exploitation and modern slavery take on an international dimension. For example, with debt bondage and threats to family abroad it can be difficult for enforcement agencies to see coercion and control. Forms of (often criminal) exploitation might take place abroad in the recruitment and/or trafficking process, at times enabled through a specific worker visa route, and then enable further exploitation at work on the back of workers’ accumulated vulnerabilities (examples were social care and cannabis factories).

HMRC highlighted a difficulty that stems from the use of employment status definitions in the online platform economy, that is, whether workers are employed or self-employed. This can raise a number of problems: first, platforms at times wrongly apply the self-employed status as they prefer to distance themselves from obligations associated with the management of workers. Second, there are practical issues for enforcement agencies to identify bogus self-employment before action can be taken by the appropriate team (e.g. HMRC has different teams dealing with employed vs. self-employed situations).

Beyond this, third, subcontracting within the gig economy presents further difficulties. The HMRC Minimum Wage Team, for example, were aware of situations where workers in the gig economy work through someone else’s app and thus were vulnerable to exploitation. It was not uncommon for someone with an account to sub-contract with 10 people to work with 20 restaurants. In order to take action, it was important to understand the exact employment relationship.

Cases of debt bondage in the health and social care visa route have been well documented in the news and research reports (see previous chapter). The Adult Social Care Team at LCC offered further detail:

- The visa route had a considerable impact on the labour market and quality of care.
- It gave employers greater flexibility to deliver care, especially for evenings and weekends, as they turned to new entrants over long-standing staff. Overseas workers appeared to be more willing and able to work unsocial hours than local workers.
- Some providers paid correct minimum wages to workers but then asked them to pay part of it back in cash.
- Some contracted providers in Leicester sponsored workers from overseas but then sent them to work in other parts of the country.

- Workers recruited through the health and social care visa route could go on working in other sectors, often as their sponsors did not exist or because they could not get sufficient hours through care work.
- Insufficient language and care training could cause problems when preparing food, reading instructions or administering medication. As a result, there had been an increase in quality and safeguarding referrals.
- Care workers' wages could fall below the minimum wage where deductions were made for car use. Some overseas staff took second jobs as taxi or delivery drivers so they could cover the costs of driving legally in the UK.
- There had been issues with some staff becoming pregnant shortly after starting work while not yet being entitled to benefits or maternity pay.

The construction industry was considered a key sector regarding the potential incidence of worker exploitation. It was reported that people were working around 12-hour days for around £50-£70 per day depending on their skill level. A central problem here, again, relates to whether workers are classed as employed or self-employed.

The Health and Safety Executive's focus is, of course, on compliance with health and safety regulations where data are kept for reportable incidents and intelligence sharing. More broadly, though, poor management of health and safety can indicate poor business management in general. Industries with low pay, poor supervision and use of non-standard employment contracts can be associated with non-compliance of regulations.

The GMB union has been very active in Leicester's garment sector over the last years and pointed to unpaid wages as a major issue and a major reason why people have joined GMB and asked for help. There had been instances of factories employing workers for 15 hours a week so PAYE would look legal and above board but workers would actually be working 40 hours a week. Sometimes they would get cash in hand for the rest of the hours but still be working below national minimum wage or workers were not paid anything above 15 hours even though they worked 40 hours or more.

Wesley Hall Community Centre has been involved in a project with garment workers and had numerous reports on wage theft and poor conditions. There had also been reports of the same in food factories as well as reports of exploitation in the care sector through visa fraud. In Wesley Hall's assessment, supply chain pressures are a key factor behind exploitation in the garment industry. Reports of worker exploitation have decreased following Labour Behind the Label's report during the 2021 lockdown and subsequent factory closures. However, in Wesley Hall's view, this does not necessarily mean exploitation has declined as the lack of employment opportunities might just lead to fewer instances of exploitation being reported. This is exacerbated by workers having few alternatives as they face language barriers, limited access to transport, issues stemming from immigration status etc.

The Highfields Centre has long supported workers in the Highfields area of Leicester and always aimed to operate a holistic approach including training as well as housing, social welfare and employment rights support. Over the last years it took a leading role in the Fashion Advice Bureau-Leicester (FAB-L) which is based in the Highfields Centre. FAB-L was set up by 8 fashion brands, three trade unions and NGOs. FAB-L/Highfields Centre, being situated in the vicinity of factories as well as workers' living areas has a good understanding of the relevant communities' problems, is a trusted institution not hampered by cultural or language barriers vis-à-vis workers and able to support their access to services. Under the auspices of FAB-L, contact was made with 1,600 garment workers alone. In the process, it was found that the most widespread form of exploitation was in terms of

hours and wage theft (not or not fully paid), differential treatment of men and women (women felt more vulnerable and coerced), and that there had been no training or development to help workers to progress.

3.4.2 Enforcement

As regards modern slavery and human trafficking, the police and GLAA are those agencies with police powers. The review has been told at numerous occasions, however, that partnerships between enforcement agencies as well as a range of civil society actors are crucial when it comes to effective enforcement.

Highlighting the importance of partnerships, it was held that an effective multi-agency partnership around human trafficking and slavery is currently lacking and as a result there are gaps in intelligence.

Crimestoppers work with a range of agencies, both in raising awareness as well as in reporting specific crimes.

LCC ASC's primary partnership as regards modern slavery is the Leicester City Safeguarding Adults Board that works across Leicester, Leicestershire and Rutland and looks, amongst others, at the prevalence of Modern Slavery in safeguarding incidents.

In June 2024 the Police and Crime Commissioner co-ordinated a Round Table discussion which led to re-establishing the Leicester, Leicestershire and Rutland Modern Slavery Action Group.

Unseen works with large companies, lead contractors such as LCC, and operates a helpline on modern slavery and exploitation, and also offers training and community support. It has worked with LCC, CQC, and ASC and engaged more widely with issues in the care sector. Unseen held that contacts to the helpline and the numbers of victims increases year-on-year. It has seen about 20-30 cases in Leicester, the majority of which are in the labour sector.

The office of the Director of Labour Market Enforcement (DLME) has a key role in the enforcement landscape as it creates a focal strategy for multi-agency work, pulling together work by the HMRC Minimum Wage Team, the GLAA, and the Employment Agency Standards Inspectorate. It conducts wide-ranging efforts together intelligence, through research, calls for evidence as well as sectoral and local roundtables (the latter focusing on sectors such as agriculture, construction, and adult social care)⁴⁶.

The GLAA investigates modern slavery and labour exploitation across all sectors. It also monitors and renews licenses of businesses and individuals in the agriculture, fish or shellfish, and shellfish gathering sectors. It operates a confidential hotline and liaises and shares intelligence regularly with HMRC, Police, local authorities, HSE, CQC, HO Immigration, NCA, UKVI.

The Health and Safety Executive's inspectors have the power of entry to carry out a workplace inspection or to investigate a concern or incident. Information can be from concerns raised direct to HSE, frontline inspections to workplaces, accidents/incidents in workplaces that require investigation, and shared intelligence from other labour market enforcement bodies. HSE works in partnership where relevant, including data sharing, participation in joint initiatives and contributing

⁴⁶ See also the comprehensive strategy: DLME (2024) United Kingdom Labour Market Enforcement Strategy 2024/25, <https://assets.publishing.service.gov.uk/media/67333fe1c10bb403d96bf2b9/uk-labour-market-enforcement-strategy-2024-25-print.pdf>

to wider, more strategic discussions. This can include, GLAA, HMRC NMW, DWP, local authorities, Immigration Enforcement, NCA or Police

As regards wage theft, the HMRC Minimum Wage (MW) team looks at the criminal aspect of any offences, looking at intelligence, and then helping the police with a joint visit.

It was noted that the HMRC MW team – as most government enforcement agencies - is intelligence-led, underlying the importance of developing robust paths towards intelligence.

In the light of cross-border exploitative practices, the HMRC MW team underlined the importance for the UK not to assist such practices further through exploitation-prone visa pathways. Specific aspects that could lead to exploitation but also could disturb the existing labour market included:

- Local authorities were given some support on procurement processes. Examples were mentioned of displaced care workers where sponsorship licences had been revoked and workers had not had time to find another employer within the 60-day period.
- A flaw in the legislation was highlighted, that the Home Office only writes to the provider if their licence is revoked. This triggers a 30-day appeal period during which a new company could be set up. The legislation here focuses on the corporate body, not the directors, and workers may or may not be moved to the new company.
- English language skills were at times found to be insufficient, increasing problems, both, for vulnerable workers as well as quality of care. While workers required ESOL Level 5 skills to work, this does not apply if they have a degree, even if the degree was in an unrelated language and subject. At the same time, English language skills were considered central in increasing workers' agency and ability to avoid the risk of exploitation.

The HMRC MW team has worked in the background in the care sector with UNISON and the Royal College of Nursing in order to shed light on key problems.

The ASC team at LCC has worked with GLAA, HMRC, the Care Quality Commission (CQC) and other local authorities to keep abreast of any emerging issues. It has a continuing working relationship with its contracted providers which includes support, monitoring as well as some enforcement functions.

- It suspended some providers who met formal HMRC requirements on minimum wages but asked workers to pay part of it back in cash. The ASC team conducted a quality assessment framework with providers to ensure compliance. For example, payrolls and data were examined and sent to HMRC in order to ensure wage compliance.
- Policies and procedures were validated with providers to make sure that overseas staff are getting the same conditions and contracts as local workers. Contracts and training records have been reviewed for local and overseas staff, and training cafes were set up for areas that were lacking.
- Overseas workers were contacted by phone to check on their conditions and to establish a relationship with them on work and employment issues. ESOL and skills training were deemed very important
- There were instances where online training was more of a tick-box exercise with a risk that the training was completed by someone else. Thus, training and support were adapted, partly delivered through training cafes, and appropriate checks and safeguards put in place.
- The LCC ASC team worked with providers and overseas staff to ensure better payment plans were looked at to reduce the impact of deductions to obtain licenses and for care use.

While the construction industry was acknowledged to contain complex and challenging subcontracting structures for labour market enforcement, the LCC procurement team shared its detailed questionnaires used to vet contractors. These questionnaires do include sections on work and employment.

Operation Tacit (OpTacit) was an important multi-agency collaboration that focused on Leicester's garment industry in 2020-21. The GLAA, Police and the Home Office visited over 500 factories, addressing workers and employers about minimum wage standards. Violations were usually considered to be mistakes, rather than deliberate non-payment, that resulted in underpayment. The broad picture emerging was that NMW compliance in Leicester's garment sector are not worse than in other manufacturing sectors which contrasts, however what has been found by recent academic research⁴⁷ and grassroots organisations. Unfortunately, though, it has proved difficult to fully appreciate the lessons from OpTacit as its evaluation still has not been made public as of yet.

Different approaches to enforcing work and employment standards have come from Labour Behind the Label, the GMB union, the Wesley Hall Community Centre, as well as the FAB-L initiative and the Highfields Centre. These initiatives were distinct in that they were based on direct access to workers at risk of exploitation and included bottom-up engagement to recover wage theft and other workplace issues.

The GMB union argued that tackling labour abuse through a focus on procurement and purchasing practices, that is, without worker representation on the ground, would prove very difficult and therefore sought workplace access in garment factories. It succeeded in securing workplace access agreement to some factories, with the support of leading fashion brands, distributed employment rights leaflets in different languages, and played an important role within the FAB-L project.

Wesley Hall Community Centre operates a food pantry and offers support in accessing universal credit, housing benefits, and ESOL classes. It also conducts outreach work and research in collaboration with universities. Also collaborates with LBL, Justice in Fashion, Shama Women's Centre, FAB-L at Highfields Centre, the Fashion Technology Academy's worker rights training, and Hope for Justice. Direct access through the food pantry and its outreach work was central for Wesley Hall to establish trust with exploited workers and to support them with regard to workplace and benefits issues.

Wesley Hall would welcome initiatives to support value chain upgrading for Leicester's fast fashion industry (focusing on products and processing that are more sustainable and command higher prices), a garment adjudicator, and felt that a stronger local authority focus on the building safety of garment factories might assist labour market enforcement in a wider sense.

A key role in the bottom-up approach to labour market enforcement was occupied by the Fashion Advice Bureau-Leicester (FAB-L) which was based on a collaboration between fashion brands, the GMB union and Highfields Centre. As mentioned, FAB-L worked closely with other NGOs, trade unions, and community organisations such as Labour Behind the Label, Wesley Hall Community Centre, Shama Women's Centre. FAB-L's success is very much based on its local embeddedness, cross-community trust and the broad-based support it could give to exploited workers across a range of problems that reach far beyond the workplace.

⁴⁷ Rights Lab, University of Nottingham and School of Law, De Montfort University, Leicester (2022) Fashioning a beautiful future? Supporting workers and addressing labour exploitation in Leicester's textile and garment industry, <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2022/june/fashioning-a-beautiful-future.pdf>

To start with, it established a club, a safe space where workers could obtain advice. Over 1,000 hours of casework support have been provided in terms of wage theft, dismissals and unsafe working conditions. A key achievement over the last three years was that clients have been helped in recovering over £170,000 in missing wages. Equally important, however, and central to the holistic approach of these initiatives, FAB-L supported 1,300 cases of support on housing, social welfare and employment rights. In total, workers have been aided in claiming over £100,000 in benefits.

3.4.3 Local authority and partnerships

The central role of a coordinator and partnerships for specific areas were underlined throughout the review.

With regard to modern slavery, for example, it was reported that a Modern Slavery Partnership had previously existed across Leicester, Leicestershire and Rutland that worked on a Prevention plan, Protection plan, Preparation plan and a Pursue plan. Unfortunately, though, that whole partnership fell into disuse as the coordinator left their post.

As a result, some of the broader prevention work was missing. There was now the support of a Strategic Partnership Board to commit the resources of agencies into the partnership looking at trafficking and immigration.

Reporters of trafficking and slavery tended to be UK Immigration Enforcement, followed by the Police and local authorities. It was important to have the local authority involved in the partnership as it is a First Responder, that is, authorised to refer potential victims of modern slavery into the National Referral Mechanism.

A broad-based partnership was considered central, as it is crucial to get intelligence from First Responders and a wide variety of actors as a route into difficult areas. At the same time, there is a question, given other concerns of the Strategic Partnership Board, whether this is the most appropriate home for a modern slavery partnership.

The DLME specifically emphasised the role of local authorities in education and outreach in labour market enforcement and noted the capabilities and good local knowledge within localities that can help enforcement bodies to discharge their responsibilities.

A suggestion from the GLAA argued that the local authority produce information to inform people at foodbanks and similar community organisations of their rights as workers. Throughout the review, points were raised by a range of witnesses about raising awareness of exploitation and modern slavery.

Further exploration, though, showed that 'raising awareness' ranges from the simple sharing of information (of signs of exploitation and where to get support) to the building of trust, access to workers with limited English language skills or workers in informal, more hidden parts of the economy, and workers in coercive situations. Importantly, this also included confidential, low-barrier spaces of support close to workers' communities. Thus, 'raising awareness' included a wide spectrum of initiatives.

In a separate area, with regard to children and young people, intelligence sharing was also deemed important to get a better picture of the local situation. It was held that there is a two-way intelligence flow between the police and social care which also includes consideration of broader safeguarding issues.

A written representation from the HSE was considered, emphasising that each local authority has co-regulatory responsibility for health and safety and must make adequate enforcement provision under the Health and Safety (Enforcing Authority) Regulations 1998 (EA Regulations).

An important area for local authority involvement concerns those areas where it controls tendering and procurement processes. The LCC ASC team evaluate home care tenders and review the Council's contracts with regard to changes to National Insurance or the living wage, aiming for them to be as fair as possible. Providers have to comply with minimum wage levels although a living wage is aimed for. To a large extent, though, this depends on central government support.

The construction industry constitutes a further area where local authorities have key involvement through procurement processes. The review was advised that the LCC procurement team vets potential contractors through a standard selection questionnaire that has been designed by the Cabinet Office. Contractors effectively self-report through these questionnaires on a range of issues, amongst others whether they have violated any core labour standards in the recent past.

Partnerships between community organisation and the local authority also existed with regard to Information, Advice, and Guidance (IAG) as well as advocacy which covers a range of issues from employment to housing or welfare. These routes were deemed important and effective in providing low-barrier support to workers at risk of exploitation as such organisations are in regular contact with workers and have their trust and confidence.

Appendices

Appendix 1 - Literature Review Presentation

Appendix 2 - Meeting Summary (Meeting 1)

Appendix 4 - Meeting Summary (Meeting 3)

Appendix 5 – Summary of Meeting with Margaret Beels

Appendix 6 - Stakeholder Questionnaire (HSE)

Appendix 7 - Stakeholder Questionnaire (GMB)

Appendix 8 - Stakeholder Questionnaire (Crimestoppers Trust UK)

Appendix 9 - Stakeholder Questionnaire (Wesley Hall)

Appendix 10 - Highfields Centre Report on Labour Marker Worker Exploitation

Appendix 11 - Unseen – Care Sector Press Release

Appendix 12 - Modern Slavery Submission (Leicester City Council – Adult Social Care)

Employment rights guides

GMB Union

<https://www.gmb.org.uk/gmb-young-workers/your-rights-at-work>

Labour Behind the Label

<https://labourbehindthelabel.org/order-our-workers-rights-guide/> available in English, Gujarati, Punjabi and Bulgarian

TUC

<https://www.tuc.org.uk/research-analysis/reports/working-uk-guide-your-rights>

ACAS

<https://www.acas.org.uk/advice>



Labour Market: Worker Exploitation

Draft Literature Review

University of Leicester

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Willems

Economic Development, Transport and Climate Emergency Scrutiny
Commission

Date of meeting: 26th November 2024
Chair: Sue Waddington



Aims

- To get a sense of the extent of worker exploitation, nationally as well as in Leicester
- g- How can we obtain evidence
- What would be appropriate strategies to tackle worker exploitation, particularly from a local authority perspective



Worker exploitation as a spectrum

- contract (formal as well as informal employment, part-time, (bogus) self-employment, zero-hours),
- pay (monthly, hourly, overtime, bonuses, deductions), holiday pay, sick pay,
- 5- working time (total hours, guaranteed hours, scheduling, shifts),
- working conditions (training, health and safety),
- discrimination, bullying and harassment,
- gender,
- citizenship and ethnicity,
- visa and right to work status
- modern slavery



Non-compliance in the UK

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Source: Judge and Slaughter (2023, 17; Resolution Foundation)

TABLE 1: There is evidence of widespread non-compliance with employment laws in the UK today

Estimated scale of labour market violations: GB/UK, various dates

	Estimated scale of the issue	Estimated number of people affected
National Minimum Wage/National Living Wage underpayment	32 per cent of employees aged 25+ at the wage floor (2022)	400,000
No paid holiday entitlement	3 per cent of employees (Q4 2022)	900,000
Not provided with a payslip	7 per cent of employees (2019-20)	1.8 million
Not auto-enrolled into a pension scheme	3 per cent of eligible employees (2019)	600,000
Firm-reported fatal and non-fatal injuries at work	0.2 per cent of all in employment (2021-22)	60,000
Worker-reported workplace accident or injury in the past 12 months	2 per cent of people who have worked in the past 12 months (Q1 2022)	400,000
Reported workplace discrimination in the past 12 months	20 per cent of working-age adults (September 2022)	8.3 million

NOTES: The figures relating to auto-enrolment and workplace discrimination refer to GB; other figures are UK-wide. 'Eligible employees' in the context of auto-enrolment are those who are aged between 22 and the State Pension Age and earn at least £10,000 per year. HSE RIDDOR reports relate to employees and the self-employed for fatal injuries and employees only for non-fatal injuries; for simplicity we use the broader category as a base.

SOURCE: RF analysis of LPC, Low Pay Commission Report 2022; ONS, Labour Force Survey; YouGov, Workplace discrimination; DWP, Family Resources Survey; ONS, Annual Survey of Hours and Earnings; and HSE RIDDOR report statistics.

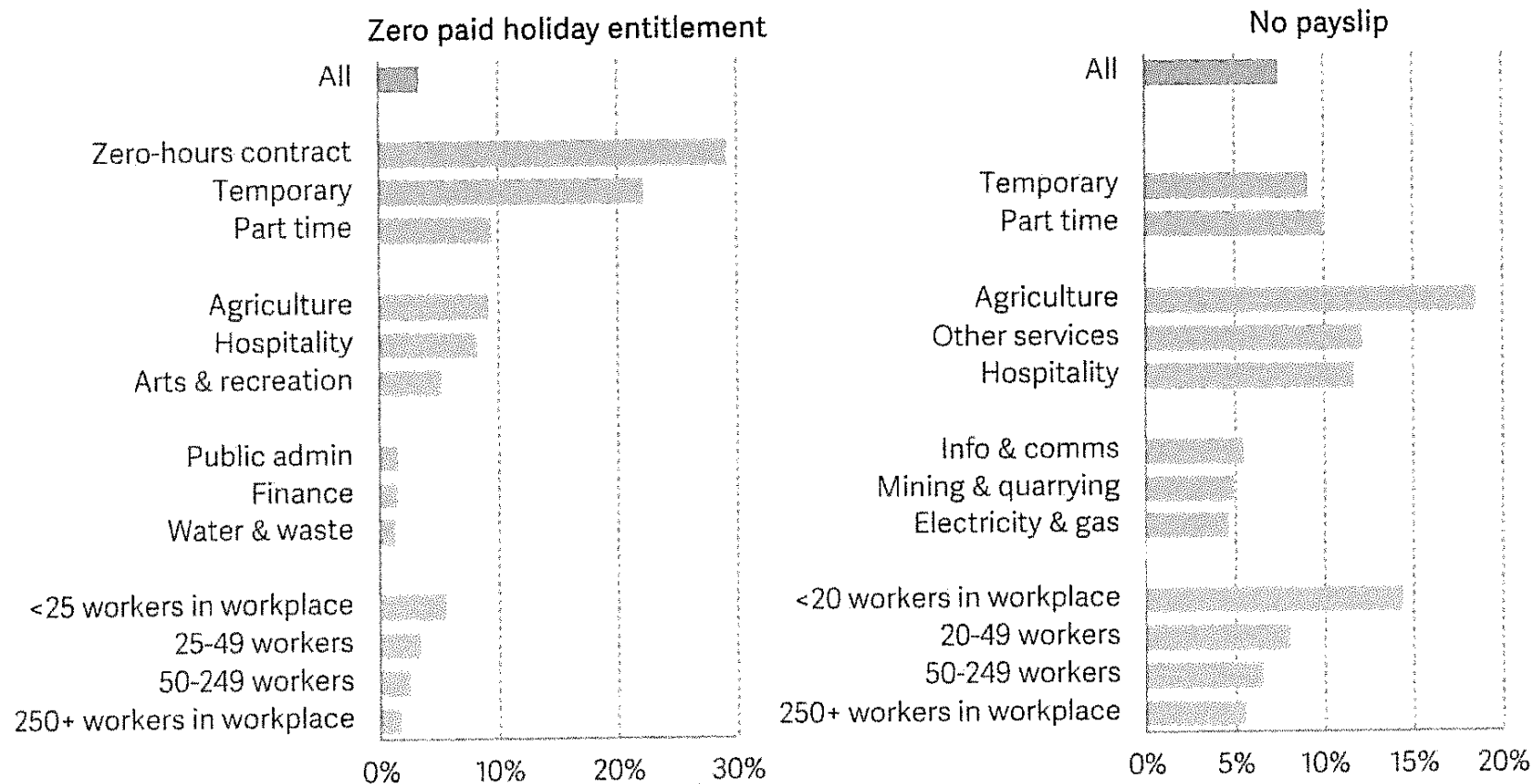


Non-compliance and insecure work, smaller businesses

55

FIGURE 2: Non-compliance is concentrated among those in insecure work and those in smaller businesses

Proportion of employees reporting zero paid holiday entitlement (Q4 2019 and Q4 2022) and not being in receipt of a payslip (2019-20), by selected job characteristics: UK



Source: Judge and Slaughter (2023, 21; Resolution Foundation)

NOTES: Main jobs only. Zero-hours contract variable not available in the dataset used to calculate the 'no payslip' figures. The industries shown in each chart are those with the highest and lowest rates of people reporting the respective violation. Data for zero paid holiday entitlement is averaged over Q4 2019 and Q4 2022 (the holiday pay variable is only available in Q4 of the LFS and we avoid 2020 and 2021 due to the ongoing impact of the Covid-19 pandemic); data for no payslip refers to 2019-20. SOURCE: RF analysis of ONS, Labour Force Survey; DWP, Family Resources Survey.



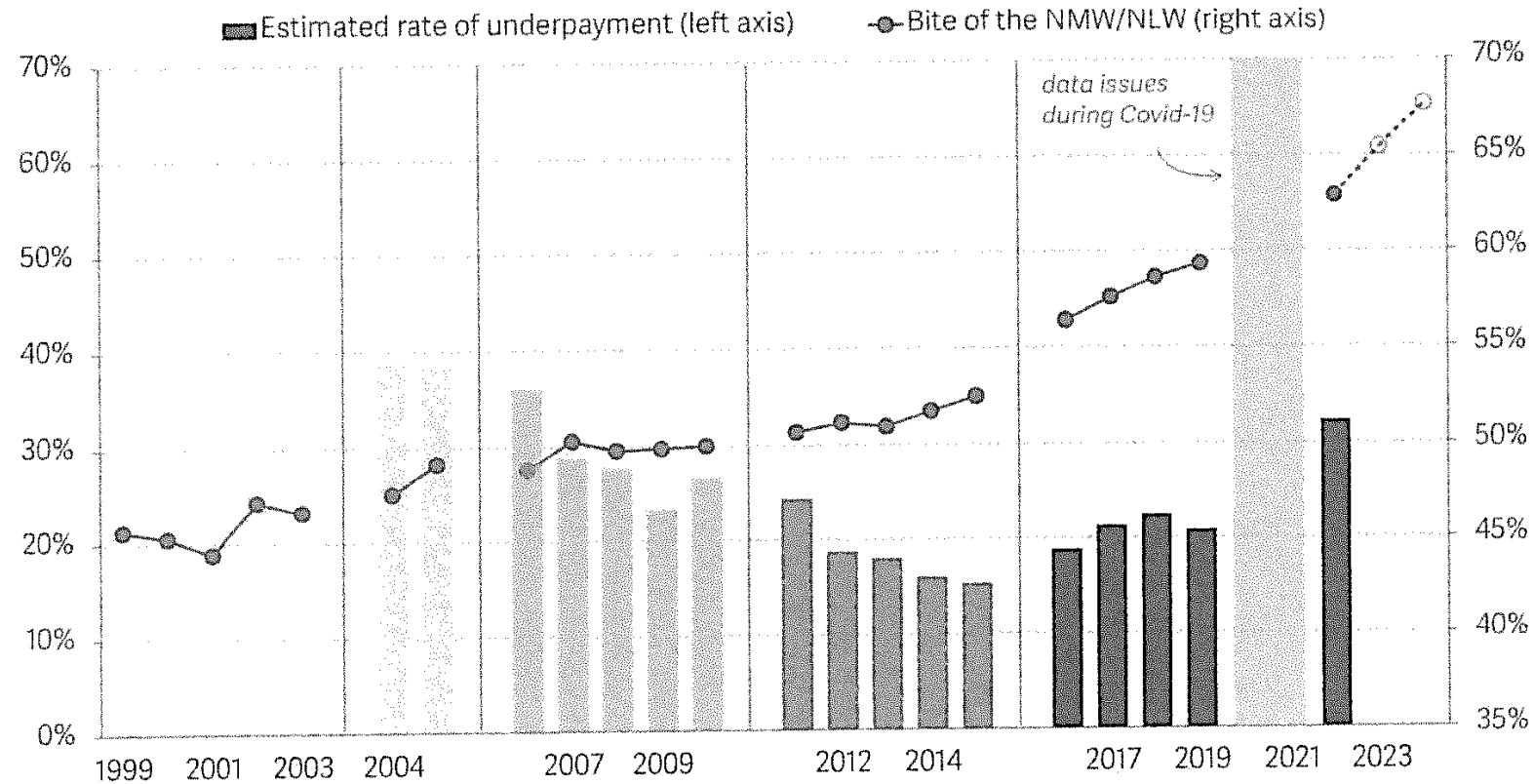
Underpayment and the 'bite' of the National Minimum Wage

56

Source: Judge and Slaughter (2023, 27; Resolution Foundation)

FIGURE 6: As the minimum wage has risen in recent years, so too has the rate of underpayment

Estimated rate of underpayment for covered workers (those paid at or below the NMW/ NLW-plus-5p), and 'bite' of the NMW/NLW (minimum wage rate as share of median wage), among workers aged 25 and over: UK



NOTES: Different methods are used to calculate underpayment rates 1999-2003, 2004-05, 2006-10 and 2011 onwards. Data for 2016 onwards are for different points in the minimum wage year than all other years, so cannot be directly compared to 2011-15 data. Bite is for April of the relevant year. We exclude 2020 and 2021 because pay data was affected by the Job Retention Scheme, where many furloughed workers were paid 80 per cent of their previous earnings. Latest data point is 2022 for the underpayment series and 2024 for the (projected) bite.

SOURCE: RF analysis of LPC, National Minimum Wage: Low Pay Commission 2018 Report; LPC, Low Pay Commission Report 2022.



Sub-sectors with a higher risk of exploitation

- Nail bars
- (hand) car washes
- Cleaning
- 57- Care (social care)
- Garment manufacturing
- Construction
- Delivery
- Hospitality
- Retail



Labour standards violations in the United Kingdom and Leicester, 2020-2024

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United Kingdom ⁱ					Leicester ⁱⁱ				
Sector search term ⁱⁱⁱ	All violations	Avg penalty (median)	Labour standards violations	Avg penalty (median)	Sector search term	All violations	Avg penalty (median)	Labour standards violations	Avg penalty (median)
Nail	12	1208	8	710	Nail	0		0	
Nails	16	1378	9	1047	Nails	0		0	
Car Wash	171	0	46	2776	Car Wash	0		0	
Carwash	19	0	1	4823	Carwash	0		0	
Nursing	303	0	34	2717	Nursing	1	22711	1	22711
Care	4326	0	717	2466	Care	9	0	2	11356
Healthcare	706	0	157	3450	Healthcare	0		0	
Retirement	93	500	6	890	Retirement	0		0	
Garments	6	407	2	1765	Garments	4	0	0	
Apparel	42	5379	25	10441	Apparel	1	2671	1	2671
Fashion	23	1665	17	1664	Fashion	1	28810	0	
Build	286	0	30	4041	Build	0		0	
Builders	1583	0	17	3734	Builders	0		0	
Building	2208	0	98	3283	Building	0		0	
Construction	4977	0	178	3054	Construction	7	0	0	
Delivery	116	2019	66	3055	Delivery	0		0	
Food	464	1792	196	2658	Food	5	3244	3	3244



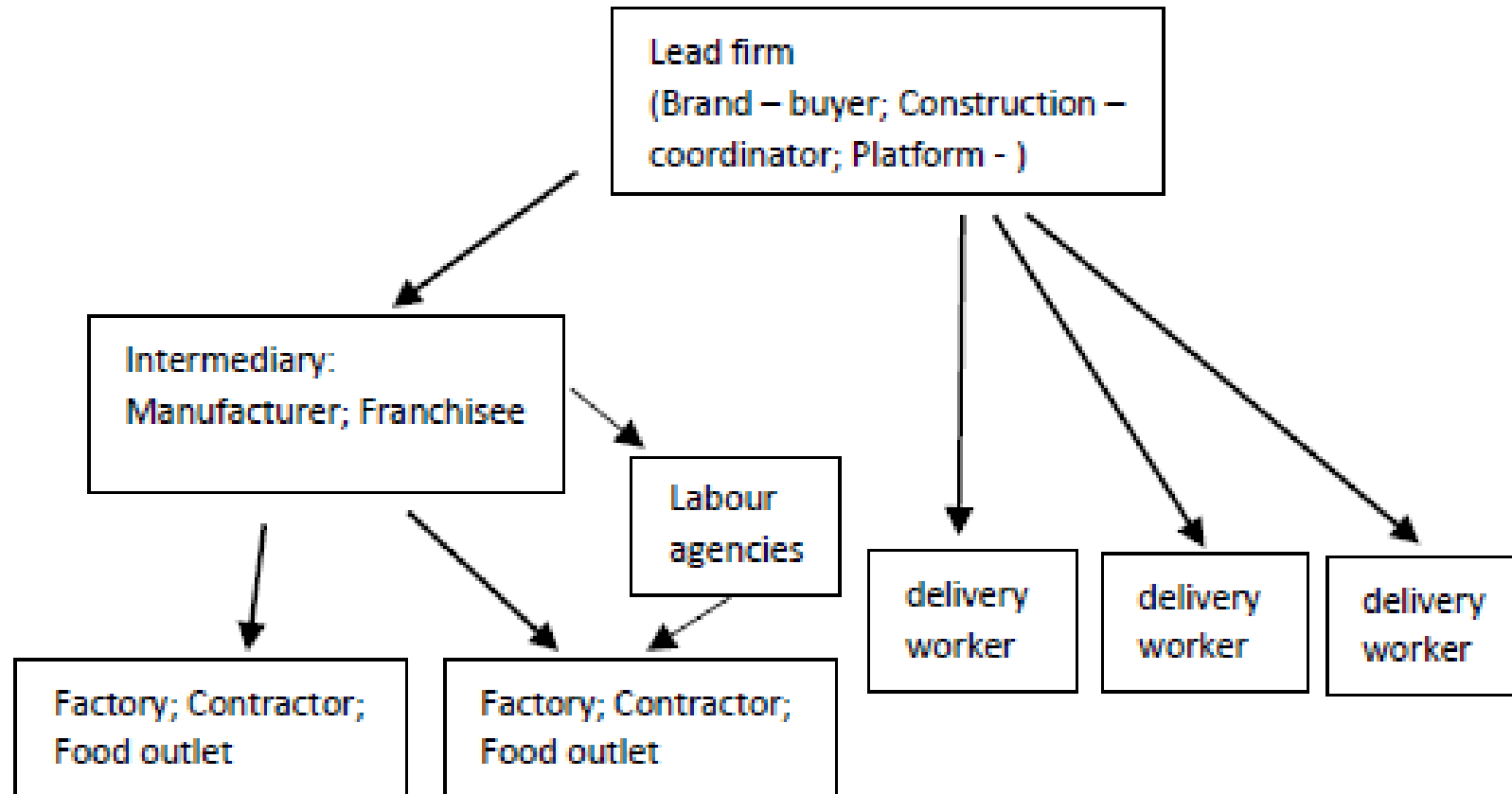
An example: the care sector

- Labour shortages, increasing vacancies, high turnover
- Health and social care visa route (Aug 2020)
- Low pay, poor working conditions, NMW violations, high agency fees, travel/scheduling, H&S
- 56- Tied visa (debt bondage of £20,000)
 - Link betw employer sponsorship, earnings thresholds, short periods to find alternative employer, (agencies)
 - 918 potential modern slavery victims in social care (by 2023)
- £12 per hour (Labour Party manifesto), Fair Pay agreements
- Example of how workers are made vulnerable (dependency/exploitation)
- Immigration aspect presents a central conundrum for enforcement strategy



Beyond strategic enforcement?

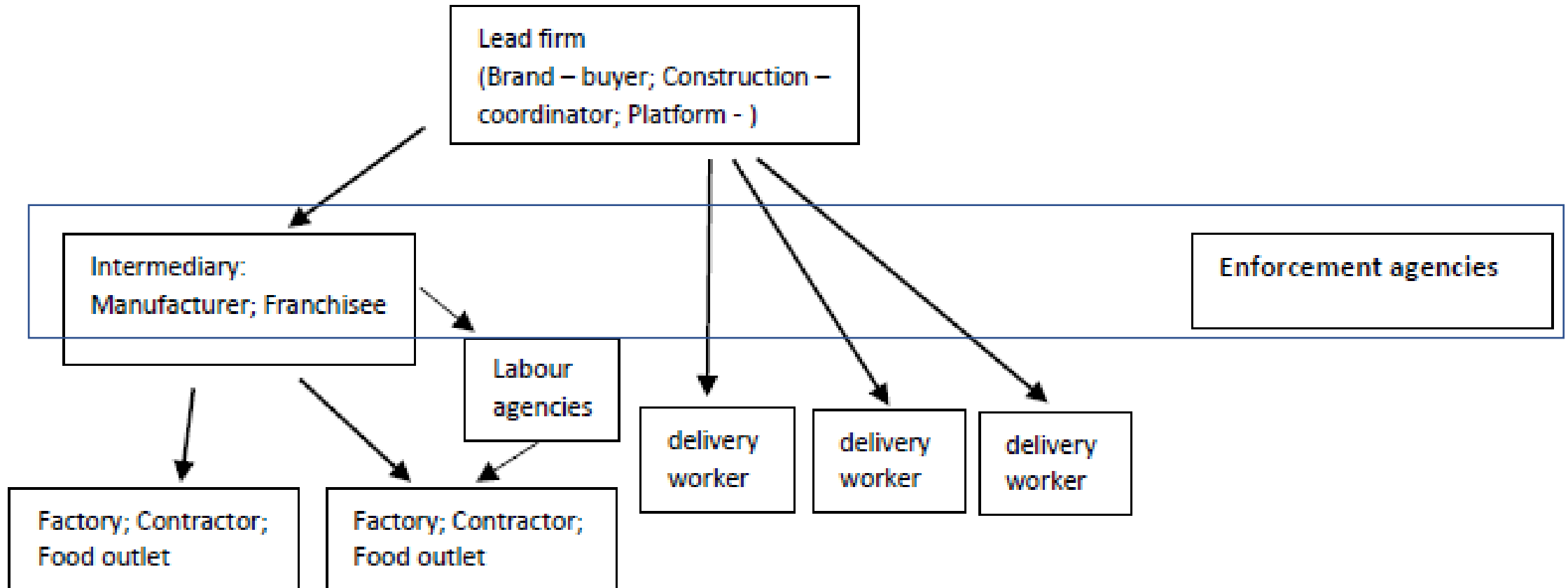
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Beyond strategic enforcement?

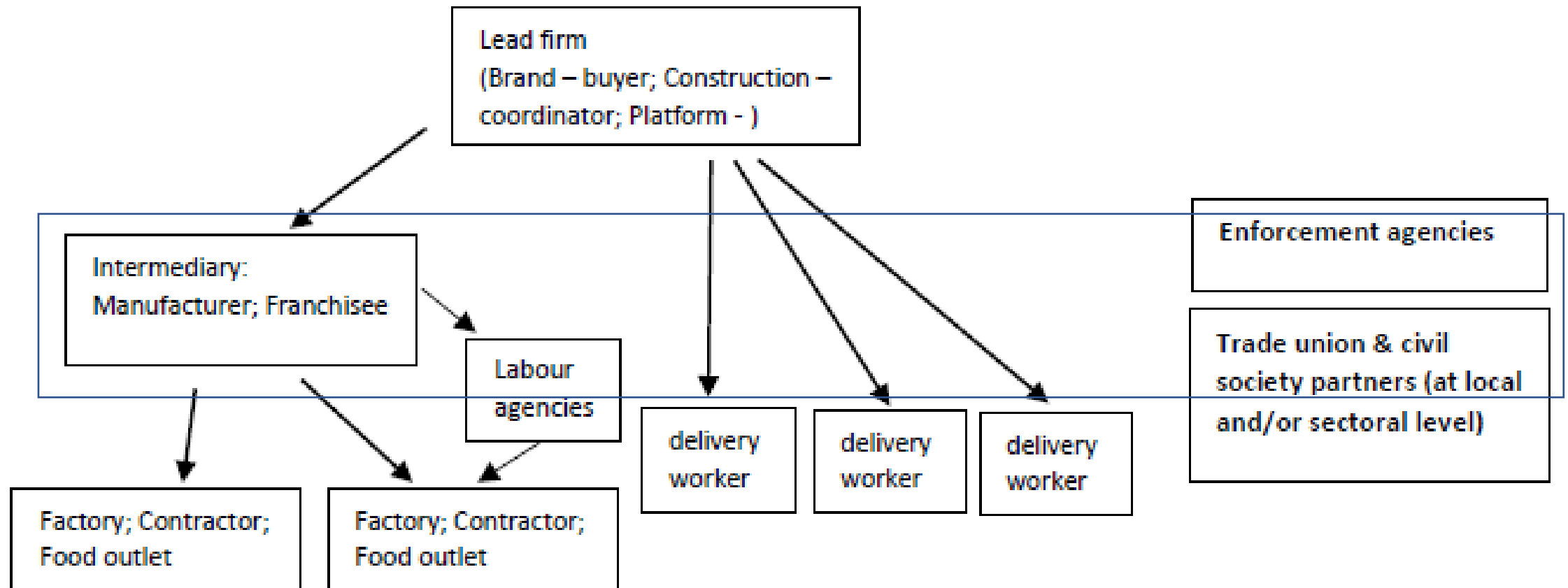
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Beyond strategic enforcement?

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Local authorities, enforcement, partnerships

- Leicester Labour Market Partnership as a reference point
- ∞- Local and sectoral partnerships
 - (Private monitoring/public enforcement)
- Charter
- Transparency in supply chains duty
- Public procurement



How to proceed?

- Two evidence sessions: 10 Dec (public/enforcement authorities), 27 Jan (trade union/civil society stakeholders)

9- Focus on

- in-depth Leicester evidence on particular sectors
- in-depth Leicester evidence on particular issues
- research practicalities of specific instruments
- develop/inform (future) stakeholder group(s)

Worker Exploitation – Meeting 1 Summary

Attendance:

Cllr Waddington (Chair), Cllrs Aldred, Bajaj, Chauhan, Haq, Singh Sangha.

Peter Chandler, Ed Brown, Julie Bryant – Leicester City Council

Nik Hammer, Chandrima Roy, Joseph Choonra – University of Leicester

Summary:

Nik Hammer introduced the issue and presented slides (attached).

Further information presented in addition to that on the slides included:

- Much of the information available is based on estimations, it gives a sense of the issue but does not give much of a sense of how to gain access to vulnerable/exploited workers.
- A key aim of this group is to expand on previous work done on the garment sector into looking at worker exploitation in other sectors.
- Worker exploitation is a spectrum, ranging from issues to do with a lack of awareness and oversight through to forced labour.
- If issues of worker exploitation go unchecked then they might be an indicator to employers that these practices can go unpunished and thus lead to further non-compliance.
- There are many issues with workers not having proper employment contracts, not being paid the minimum wage, or being forced to pay back some of their wages. These dimensions are interlinked in different ways depending on the sector or sub-sector.
- A member highlighted issues in the retail sector and the hospitality sector, particularly with workers from abroad. It was further suggested that some refugees were being forced into prostitution or drug dealing, and it was asked how these people could be protected. It was clarified that the purpose of the task group is to determine at the end of the process what the Council can do.
- Statistics were presented on non-compliance in the UK, for example in terms of those underpaid or those on minimum wage, and those without holiday pay. It was also noted that there is a gap in injuries reported by firms and injuries reported by workers.
- In terms of pay withheld, this has a knock-on effect on the local economy as it means that these workers are less able to spend money locally. They might also be more reliant on Council services due to a lack of money.
- According to the Trades Union Congress (TUC), 3.7million people worked in insecure jobs in 2022.
- The Trussell Trust has reported that there are 5.3million people facing hunger and hardship in households in which at least one person works.
- Non-compliance and insecure work is a particular issue in smaller businesses (those with below 25 workers per workplace), in terms of those without a proper payslip and those on temporary and part-time contracts. Asian and Black people are most at risk. The causal link to non-compliance is through business model and practices, for example, 30% of those on

zero-hour contracts, 20% of those on temporary contracts, and 10% of part time workers do not receive holiday entitlement.

- Agriculture and hospitality are sectors where many are on temporary and part-time contracts.
- Sub-sectors with a high risk of exploitation were presented based on news reports and research reports. This is not an exhaustive list, and it is to be noted that there are sub-sections within the sub-sections (for example, the different areas of hospitality). There has been difficulty in finding a way in to get access to workers in order to develop roots to help and support them.
- With regard to data on labour standards and violations there is a need for caution as the violations presented are only officially recorded violations and therefore there may be many more that go unreported. Additionally, the way the sectors are recorded on the database is not systematic, so it makes it difficult to compare with any other database. Therefore, this is quite a rough approximation. It is also important to note that larger companies get bigger fines as they have many branches around the country.
- It appeared as though there is an underrepresentation of violations in Leicester.
- With regard to the Care Sector, it was noted that under the health and social care visa route workers from overseas in the Care Sector need an employer sponsor and the earnings threshold is high. Therefore it has been seen that agencies and employers can exploit this dependency of workers. Whilst workers can change employers, they only have 60 days to do this, which makes it impractical and puts workers in a conflicting situation with immigration and right-to-work laws.
- The data was unhelpful in helping to work out how to support vulnerable workers. It is difficult for vulnerable and exploited workers to come forward as it makes them vulnerable to dismissal. It is also an issue that workers may be reluctant to come forward depending on their immigration status. It is difficult to support workers rights if there is a hard line on immigration, and it is difficult to work with stakeholders if they refuse to collaborate with enforcement agencies if their workers are at risk of being deported.
- Flow charts were presented showing starting points on potential solutions. It was noted that there is a complexity of supply chains and sectors. With lots of intermediaries before we get to contractors.
- One model shows a large brand at the top, with franchise-takers with a number of outlets. In this case, it is the franchise-taker that is the employer.
- Past enforcement had looked at where work was done with who the managers were. This was often very labour intensive as it raised the question of who was responsible (i.e. who was the employer).
- Many countries now shifted to strategic enforcement, looking at intermediaries.
- Resource constraints are an issue, if there are not enough labour inspectors, the chance of inspection is low, and if penalties are not high then businesses can build the risk of fines into their business models.
- Beyond strategic enforcement, difficulties in enforcement arise from the way industries are fragmented. Even if enforcement had more resources, they would still find it difficult to get intelligence on labour standard violations, so it would be useful to work with a range of stakeholders in civil society and trade unions at a local and sectoral level.
- A step towards this was the Leicester Market Partnership which tried to establish a dialogue with actors within various sectors. This could be a starting point for further action.

- Industry partnerships often have little authority in enforcement and therefore rely on building critical mass. However, whilst this is a useful point for the exchange of information, it often is difficult to build more activity much beyond this.
- The model of private monitoring and public enforcement was looked at, whereby public agencies have the authority, but grassroots organisations have better access to problem areas for monitoring. Due to tensions between worker rights and immigration law, this model needs a formal agreement between private actors and public agencies so that there is trust in actions.
- It was noted that there had been a Charter Commitment between Unison and Salford City Council, whereby the Council had committed to be the employer of last resort, this could be explored in more detail as it allows the Council to get a grip on problem employers and support exploited workers and also get a grip on turnover and keep skills that had been developed.
- There is a duty for transparency in supply chains. Supply chains can be used to implement minimum standards in monitoring.
- Different groups are affected in different ways, so it might be useful to look at different sectors and different sectors and different aspects in different depths.

Members were asked if they had any questions or observations. Key points included:

- Concern was raised that there needed to be strategies to increase jobs. When the population was struggling for jobs, they would be more likely to take jobs with less money than perhaps they should be earning. With regard to this it was suggested that it is important to think about what is done in terms of what council powers and resources might be, perhaps focussing in a particular area. In terms of what else could be done, linking with programmes to support job creation and connecting people to opportunities could be something recommended by the review.
- It was further noted that local jobs fairs are a good idea. In addition to this, there is a pending government white paper 'Get Britain Working'. This was aimed at bringing forward new arrangements for local plans to join up work, health and skills. There was also a new Connect to Work programme to help the economically inactive and those with health conditions, this could help to create incentives and opportunities and connect to opportunities.
- It was noted that exploited workers were often afraid of making complaints as they needed to feed families and pay rents. Therefore, consideration needs to be given to how people can make complaints. Perhaps through adverts in different languages.
- Issues were raised surrounding the creation of jobs for less-skilled people and people for whom English was not a first language as well as those arriving on student visas. Also, the issue of the risk of such people losing their jobs should they report exploitation.
- Further concern was raised that with increases in minimum wage and National Insurance, small businesses may need to reduce the number of jobs available, or the number of hours people can work. It was asked how the businesses could be helped as well as the people of the city.
- It was explained that a problem with the figures available is that they do not always reflect the reality of what is happening as published national data becomes more unreliable at the local level. Therefore, it is important to talk to people close to workers who also know the areas. For example, Councillors who know their Wards and organisations that support workers.

- It is not always possible or practical for vulnerable or exploited workers to raise complaints at employment tribunals.
- Key issues are how to access vulnerable workers, and language and skills are key issues within this. It is necessary to engage people who know the background to issues, speak the language of the workers in question and know their living conditions. It is often the case that people seek advice not just due to work problems, but also due to issues with rent or landlords. When support organisations are engaged to help deal with these issues it is often discovered that the root of the issue is worker exploitation.
- It is hoped to obtain more input and advice.
- It is important that Leicester does not become a place that allows business models to function that can only function if they pay below minimum wage.
- Factory owners are claiming to be squeezed by brands, however, some brands are saying that they would invest more if there wasn't such a risk of worker exploitation. Therefore it is important to support the most vulnerable people on the ground.
- The issue was raised that due to employers being associated with exploitation, rightly or wrongly, retailers have been reluctant to invest in the city due to a reputation. This was particularly an issue in the garment industry and between 4.5-5k jobs have been lost in the sector between 2020 and 2023 due to retailers such as Boohoo moving elsewhere. The fact that supply chains for large brands are making decisions between territories makes it difficult for cities to respond.

How to proceed:

- It is necessary to think about how we can reduce non-compliance.
- The next meeting will be the first evidence session which will aim to engage people with a national responsibility for enforcement. It will be necessary to ask about ways people complain etc.
- The third meeting will be the second evidence session to get the perspective from witnesses in trade unions and in civil society.
- It will be useful to look at how other authorities operate, such as the Charter Commitment at Salford.
- It will be useful to look at further possibilities in terms of the way people complain and report issues, taking language barriers into account.
- Job fairs can be considered to support workers in non-formal sectors where workers are in danger of exploitation. Effective engagement is likely to remain a challenge.
- Delivery riders could be a specific example to consider as their need for work causes issues on streets.
- It was enquired as to how many seasonal workers worked in Leicester.
- It was requested that case study of an example of reported exploitation, the process followed, and the result, be brought to the group.
- It suggested that the link between procurement and standards be looked into as an example of a potential local authority action.

Worker Exploitation Task Group – Meeting 3 summary.

Attendance:

Leicester City Council - Councillors Waddington, Aldred, Bajaj. Peter Chandler, Ed Brown, Julie Bryant.

University of Leicester – Nik Hammer, Joseph Choonra, Chandrima Roy.

Highfields Centre – Priya Thamotheram, Fatimah Li, Ellias Mussa, Vandna Gohil

GMB – Cassie Farmer

Unseen – Justine Carter

Leicester & Districts Trades Union Council – Chris Willars

Representations from Stakeholders and Witnesses

Highfields Centre (including FAB-L)

- In the decade (approx.) that worker exploitation issues surrounding the garment industry have been widely known, there have been many interventions by government agencies, academics and media. Following initial engagement, the situation went quiet, and some actions have not been followed up.
- During the pandemic, a national network was set up with approximately 85 agencies (clothing brands, NGO's, regulatory bodies and unions. Leicester City Council (LCC) was also a part of this.
- Eight clothing brands, three trade unions and NGOs set up the Fashion-workers Advice Bureau - Leicester (FAB-L). This has made a positive difference to local Garment Workers' lives.
- The mission of the Centre is captured in its motto 'Enhancing Lives, Empowering Communities and Enterprise for All'. The work of FAB-L fits in with this ethos.
- A report has been produced to share insights and intelligence. This has been circulated to members of the group.
- Contact has been made with nearly 1,600 garment workers in the city and nearly 600 clients have been helped and there have been over 1,300 cases where support on housing, social welfare and employment rights had been given.
- Key achievements over the last three years:
 - Clients have been helped in recovering over £170k in missing wages.
 - Over 1000 hours of casework support has been provided in terms of wage theft, dismissals and unsafe working conditions.
 - Workers have been aided in claiming over £100k in benefits.
- The Centre has had direct insight into how challenges and barriers can be overcome. The Centre is in the vicinity of several factories, and so it is aimed to engage with

hidden factories. This issue came to light during the Covid-19 pandemic and it was realised that there was a problem in terms of connecting with garment workers.

- Garment workers felt unsupported as there was no connectivity with communities, particularly about language barriers and knowing how to access services. It had been necessary to get garment workers to access the Centre, so that issues could be drawn out.
- Issues identified included:
 - Workers had been exploited in terms of hours.
 - Men were treated differently to women. Women felt more vulnerable and more coerced.
 - There had been no training or development to help workers to progress.
- At FAB-L's outset, there had been 750 factories identified as in operation with UK brands making big profit margins online.
- There is concern around suppliers and brands. When a factory takes work on at a cost, they do not want to lose the brand as a supplier.
- There is a need for fair trade and reasonable prices.

Summary and Recommendations from Highfields Centre (Received following the Meeting):

We believe that that local council has a vital role to play in tackling worker exploitation across Leicester's labour market: -

- 1. Take a direct lead on tackling Modern Day Slavery that resonate across the city, empower, and employ more local people who understand the community demographics and hardships better*
- 2. Invest in organisations that are in regular contact with workers and have their trust and confidence to provide support, IAG and advocacy.*
- 3. Support factory bosses/ companies with grants to re-establish self-employment and create jobs for others*
- 4. Increase publicity around breaking the Law and enforce fines for malpractices*
- 5. Increase publicity for workers to access help in multiple languages and a face-to-face service as many are digitally excluded*
- 6. Implement research findings to investigate issues and focus on sub sectors/particular demographic that is underserved, or an emerging issue*
- 7. It is important to approach the subject ethically, ensuring that data collection respects the privacy, safety, and dignity of those involved.*

Unseen

- Safehouses are operated for victims of modern slavery and exploitation. Additionally, support in the community is given as well as training and work with the government on policy.
- There is a UK-wide helpline on modern slavery and exploitation.
- Work has been conducted with high street businesses such as JD Sports, Next, ASOS and Tesco, as well as with the construction centre and across the remit of the organisation.
- The organisation has been involved with the garment industry in Leicester.
- Numbers in terms of contacts to the helpline and the numbers of victims increases year-on-year.

- Cases fluctuate in Leicester. The organisation differentiates between modern slavery (where there is often control or threats) and labour abuse (which includes issues such as non-payment of minimum wage or a lack of breaks or general bad work practice).
- There have been 20-30 cases in Leicester, the majority of which are in the labour sector.
- Sectors where modern slavery is seen includes:
 - The care sector.
 - Hospitality.
 - Retail.
 - Services.
 - Transport and Logistics.
- Large companies have big supply chains which can include sub-contractors and a transient/temporary workforce. The 'Gig Economy' is a big issue.
- People reporting directly talked about desperation, a lack of status and issues in the financial crisis. These issues give opportunities to exploiters.
- The organisation supports the government and councils. Work has been done with LCC, as well as with councils in the East region and South West region. This work has engaged with social care and issues in the care sector. CQC and youth services have been worked with as well as Adult Social Care (ASC).
- County Lines gangs have been an issue.
- Understanding legitimate supply chains can provide scope for exploitation. It is necessary to think about what this means in terms of actions.
- Calls and contacts were made regarding issues at car washes. Also, exploitation in nail bars is widespread.
- The organisation has links with the DWP to work on fraud that occurs whereby people would be set up with accounts they do not know about, therefore they can appear to be working for a legitimate company, but the money was not going to them. It was aimed to educate people who might have the opportunity to spot someone in this situation and could report it to the police or other organisations who can support.

GMB

- GMB had come together with the TUC on the garment industry from a union perspective.
- There had been a struggle to access factories and factory workers are in need of representation for grievances. GMB have leafleted outside factories to inform workers that they could join.
- Brands have come on-board, they had given GMB access to the supply chain so that workers could be engaged with directly. Additionally, GMB had been partnered with the Highfields Centre, who are a link of trust for workers.
- Community Project Workers have approached the union as they had noticed oppressive environments and workers had not wanted to talk in front of their employers. This had led to the creation of a club whereby people could talk in a safe space about issues with unions present to advise.
- Unpaid wages are a major issue and a major reason why people have joined GMB and asked for help. There had been instances of factories employing workers for 15 hours a week so PAYE would look legal and above board but workers would actually be working 40 hours a week and sometimes they would get cash in hand for the rest

of the hours but still working below national minimum wage or workers were not paid anything above 15 hours even though they worked 40 hours or more, so not clocked in for anymore than 15 hours or recorded anywhere that they worked more than 15 hours.

- Brands have been approached to find out why factories are using this illegal system, but there has not been much comment from brands as it is hard to prove if workers are not clocking in or recorded.
- Brands take 90 days to pay invoices which leaves factory owners out of pocket trying to pay workers and materials.
- Production has declined, partly due to orders declining following a surge during the Covid-19 pandemic, and partly due to outsourcing as the national minimum wage is increasing.
- It is difficult to tackle the issue of labour abuse in procurement and purchasing practices.
- The organisation Labour Behind the Label ran the '1% Campaign' which suggested that 1% of brands' production should be made in the Leicester, this could increase accountability of orders coming through Leicester.
- It was aimed to achieve a wage above the national minimum for workers in the future.
- Fast fashion from abroad can avoid repercussions.
- There is a need for effective factory regulation, however, it needs to be approached carefully so as not to drive them underground.

Leicester & Districts Trades Union Council

- As an organisation the LDTUC does not work directly with many workers.
- Workers at risk other than those in the garment industry include delivery riders as they can earn less than it appears depending on the way they are employed.
- The Independent Workers Union of Great Britain (IWGB) attempted to organise Deliveroo riders, but it was now uncertain as to whether they could find ways in.
- Trade unions can be part of the solution, but there are barriers to getting unions in touch with workers and raising trust. Additionally, if a person is earning less than minimum wage, then subscription fees can be a barrier.
- Exploitation is not just about pay, but about conditions (for example, denying leave). Therefore, it is important to consider employment legislation.
- Working conditions can also be an issue. The worst exploitation is difficult to find out about and the perpetrators can easily disappear. This is an issue that needs to be looked at.

Questions

- It was asked as to whether unions offered information in different languages. Chris Willars noted that the Baker's Union, who often deal with food production workers who often work in other languages than English, have literature and representatives and literature that can cater for South Asian and Eastern European Languages. They often try and organise in factories where pay is poor. Cassie Farmer noted that GMB produced leaflets in different languages which had QR codes that directed to videos in different languages. It was hoped to get a GMB representative in the community to help communicate.

- It was asked as to whether workers from sectors other than the garment industry were approaching Highfields Centre. It was noted that there was connectivity with car washes and restaurants. Additionally, the centre has been approached by people who needed help with Home Office Applications. Highfields Centre had received numerous enquiries from gig economy workers, these people could be assisted, even if just through signposting.
- concern was raised that whilst FAB-L had been effective, there had not been as high a level of connectivity recently. Over the three years that FAB-L has been in operation, there has been initial funding from brands and unions. As there has been a decline of the garment industry in Leicester, some of these brands had been lost. The Midlands TUC had continued engagement, but financial support from unions had fallen away, so there is an issue about how the work can continue.
- It was noted that the government had set up the modern slavery fund, but this appeared to be aimed at modern slavery practices abroad.
- It was suggested that the approach needed to be more proactive than reactive. It would be useful to have a steering group of people with different skills and strategies in the community. People could be brought together for systematic change to address issues.
- It was suggested that it is important to educate young people on their rights. Justine Carter from Unseen noted that previously in Leicester the Football Association had been worked with on community programmes with children at risk of exclusion, many of which had chaotic home lives. As part of this, individuals vulnerable to exploitation were worked with as a chance to educate the next generation. Leaflet campaigns had been conducted in LE4 and LE5 on the garment sector issues and calls had been received in relation to it, which was a chance to raise awareness.
- Unseen runs a spotlight programme for 11-18 year-olds was run. This focussed on County Lines and sexual exploitation as well as how to make decisions regarding the world of work.
- Additionally, it was noted that a number of people had entered the country on student visas and had then been encouraged to work outside of their visa requirements. This made them vulnerable to exploitation as they could be threatened in terms of being exposed that they were breaking visa requirements.
- Focussing on investors, investment companies were looked at by Unseen to ensure their investment strategies do not inadvertently fuel modern slavery.
- In response to questions about which interaction with government agencies had been useful, the representatives from the Highfields Centre noted that over more than three years they had been approached by various government departments and agencies. These agencies had reached out to the Centre to say that they were unable to connect directly with garment workers. The Director of Labour Market Enforcement had visited, and she had been taken to some factories to get a sense of what the issues are rather than trying to make pronouncements from outside.
- It was suggested that work coaches from the DWP could be a source of anecdotal evidence, although it was also noted that exploited people may not want to engage with the DWP.
- In response to questions about funding, Peter Chandler noted that one-off funding had been secured for a dedicated Community Safety (Labour Market) officer post in the Council, but this had been time-limited. An officer had been seconded from HMRC to the Council's community safety team in 2019 to help to work with relevant organisations such as the Local Authority, enforcement agencies, community organisations and NGOs. The funding for this post had now ended and hence it has

not been possible to replace the post. Resourcing pressures on local authorities, and indeed many organisations with a positive role to play, is and is likely to remain a challenge.

- In terms of powers and resources, the local authority has no powers or resources to go into factories and inspect them and enforce regarding any issues mentioned. Powers are held by national regulators rather than local authorities. For example powers/ resources around minimum wage issues are the responsibility of HMRC, and health and safety issues are the responsibility of the Health and Safety Executive.
- The local authority had hosted a select committee on the garment sector in 2019 at which it had stated that if it could be good if the local authority had the powers and resources to tackle issues. In the food industry for example Councils have licensing powers to inspect and close food premises, but this is not the case for other sectors.
- There are legal issues surrounding intelligence sharing between national enforcement agencies. The new government is proposing to create a new Fair Work Agency to bring enforcement bodies together into a single organisation, which would be a positive development.
- The Chair noted that recommendations can be made regarding the care sector as the local authority has involvement in this. In response to this, Highfields Centre noted that it should not be a top-down approach and should be about building trust and confidence in people who had gone through nefarious experiences.
- It was noted that people sometimes raised issues of exploitation on the back of other issues such as health and housing. As such a holistic approach is needed.
- GMB noted that funding for the Highfields Project had been a struggle as it was members' money and as such needed justifying. They would be happy to launch campaigns, but as it would be with members' money, it would need to be their voice on what they wanted to campaign on.
- The Chair noted that resources were an issue and could not be promised even though they are needed.

Potential Recommendations:

- For further work to encourage schools / colleges to educate young people on employment rights.
- Unseen suggested collaborative engagement with Trading Standards to examine how legitimate supply chains, such as taxi firms, can provide opportunities for exploitation.
- The Secretary of Leicester and District Trade Union Council felt it would be useful to look further into the wages of food delivery drivers. Trade Unions may be able to assist but how can barriers with Trade Unions memberships be reduced?
- It could be useful to delve into issues of self-employment as this can be a tool to circumvent employment legislation on matters such as minimum wage and sick pay.
- The committee may wish to consider a delve into factories closing down and quickly re-establishing, often with the same staff – work with Trade Unions may be of help here regarding ensuring safe working conditions.

- The creation of a multi-agency steering or task group to examine root issues and work towards systematic change, looking at areas such as:
 - Leaflet delivery workers being paid well below minimum wage to work in all weathers.
 - Local shops obtaining licenses to bring staff in from overseas, these staff can be housed in poor conditions and could be considered the equivalent to modern day slaves.
 - Care Worker roles advertised on Social-Media paying low wages.
 - ESOL support required to prevent exploitation due to language barriers.
- The Highfields Team would like to connect more with the council.
- Could FAB-L be expanded to look at gig economy workers? This would require more resourcing from central or local government which might not be available.
- To review Care Sector issues around visas and levels of English language.
- A holistic approach was welcomed as those in low wage jobs can experience a range of issues affecting quality of life, such as poor housing and health issues.
- To examine how to improve communication with those in danger of exploitation. Information leaflets in different languages may help to inform people who to contact on work exploitation matters.
- More work was welcomed with Unseen relating to the Care Sector.
- To examine local authority procurement in further detail and look at how it can include regulation on worker exploitation.

Worker Exploitation Scrutiny

Summary of meeting with Margaret Beels

Attendance:

Leicester City Council - Councillors Waddington, Aldred, Bajaj. Peter Chandler, Ed Brown, Julie Bryant.

University of Leicester – Nik Hammer, Joseph Choonra, Chandrima Roy.

Margaret Beels.

Margaret Beels made the following points:

- Her role had been laid down as part of the Immigration Act 2016. It had been created to try and pull together the work of three different bodies: The National Minimum Wage Team, the Employment Agency Standards Inspectorate, and the Gangmasters and Labour Abuse Authority.
- An overarching strategy was set for the three bodies to encourage collaborative working and to minimize exploitation. It is aimed to do this by presenting a strategy with recommendations to the government aimed at reducing the scale and nature of exploitation.
- Each year an assessment is made on the nature and scale of exploitation by consulting the three bodies to discover what they are seeing and drawing risk models based on the information from the bodies and assessing the risk. Additionally, each year she issued a call for evidence, both through written evidence and through a series of round-table events whereby stakeholders are invited to share their findings and intelligence in terms of labour exploitation.
- The strategy is required to be submitted before the end of March 2025. 60 written responses had been received from a wide range of organisations, including businesses, trade unions, NGOs and academics. Additionally, around ten round-table sessions had been held, some of these were based around certain sectors such as agriculture, construction and adult social care (ASC) as these were seen as sectors with a high risk of worker exploitation. There had also been further sessions for representations from other sectors. Various organisations had contacted Margaret Beels to ask her to speak at round-table events to help them gather evidence.
- The government are putting through legislation to increase worker rights in a number of areas. As part of this, the Fair Work Agency would be set up, which would amalgamate the aforementioned three bodies. As such, it is important to establish what people were looking for from the Fair Work Agency and what work from the three bodies they wanted continued. The Strategy would include this.
- The Strategy which will include a series of recommendations has to be presented to Ministers from the Home Office and also the Business Department.
- Ministerial approval is needed to publish the strategy.
- The 2024/25 strategy originally presented in March 2024 had been slightly altered and represented in August to fit with the context of the new government following the election. However, the recommendations had remained the same.

- Clearance to publish was received in October and the strategy was then published in November 2024.
- Additionally, an annual report is published. This is an assessment of what has been achieved as a result of recommendations in previous strategies. Sometimes these reports covered more than one year.
- A joint report covering 2023/24 and 2024/25 may be produced prior to Margaret Beels' position being abolished.
- The government had not yet announced when the Fair Work agency would commence. The legislation had completed its second reading in the Commons and the committee stage. The next stage will be the report stage before it goes to the Lords. It is uncertain if it will reach this stage by the time of the summer recess. It is thought that the implementation of provisions within the bill would be phased.

Questions were asked to Margaret Beels and responses given:

- In response to a question about what local authorities can do to address the issue, Margaret Beels suggested the following (working on the premise that funding would not necessarily be forthcoming):
 - Workers could be educated on their rights, for example through adult education programmes, and encouraged to go to their employers to say what they are entitled to.
 - Young people can also be educated at school on their rights to be empowered going to the world of work. Further Education Colleges can help young people understand what to expect from a workplace.
 - People can be educated about the potential downsides for themselves of self-employment.
 - Local authorities have good local knowledge that they can share with enforcement bodies. This information can help enforcement bodies to discharge their responsibilities.
 - Signposting regarding where workers should go for help and support when things go wrong can be upheld in businesses.
 - Local authorities can have a facilitating role in driving up standards. For example, the Council could act as a broker between UK brands and suppliers to develop a new and more thriving garment industry based around higher-value garments. This could benefit the workers and the city. The training of garment workers by the Leicester Fashion Academy would be important to this.
- It had been frustrating that the Op Tacit report had not yet been published. It had been presented to the previous government, but they had not been enthusiastic about publishing it. It is her intention to re-present it.
- The recommendations for the Op Tacit report are in two blocks, the first block is specifically aimed at enforcement. This looked at the operation as it took place and what lessons could be learned. Only one piece of enforcement work had been undertaken on the back of modern slavery legislation. A lot of work had gone into identifying exploitation.
- It is correct to say that what Op Tacit found in Leicester in terms of National Minimum Wage compliance was not atypical compared to other manufacturing. However, work done via the Nottingham Rights Lab had reached different conclusions in terms of whether there was worker exploitation. Therefore, questions are raised about how information is gathered and how best can an accurate picture be obtained. It is

necessary to think about with whom enforcement works to get an accurate picture. The Op Tacit report does not make any recommendations in this area.

- It is necessary to identify workers at risk of precarious work and the DLME Office has commissioned research in this area. Its initial report found that workers in hospitality, retail and construction are most liable to be at risk. Additionally, women were more likely to be at risk than men and younger and working-class people were also at risk.
- With regard to the garment industry, the purchasing power of brands and forced conditions of manufacturers made it difficult for businesses to be compliant.
- Leicester was not flagged as a 'hot' area for non-compliance in the garment industry compared to other countries. It would be desirable to encourage brands selling in the UK to source more from the UK.
- It is necessary to think about how the local authority gives confidence to retailers to source garments from Leicester.
- In response to queries about intelligence gathering, it was suggested that it is necessary to think about who workers trust in order to report violations of rights or non-compliance. Highfields Centre and Wesley Hall could be conduits for this. It is necessary to think about how we build on their insights to build on the position of workers.

Labour Market: Worker Exploitation Economic Development, Transport and Climate Emergency Scrutiny Commission

Stakeholder questionnaire

The City Mayor's Strategic Plan commits to tackle non-compliance across all sectors that may be blighted by low pay and poor conditions. This questionnaire is part of a collaboration by the Scrutiny Commission with the University of Leicester aiming to gather information on the monitoring, incidence, and practices of worker exploitation across different sectors in Leicester. For these purposes, worker exploitation is seen as a continuum stretching from low pay to poor conditions or Modern Slavery.

Given your expertise in monitoring and combatting specific aspects of worker exploitation, Leicester City Council (Economic Development, Transport and Climate Emergency Scrutiny Commission) would like to invite you to complete this questionnaire prior to the evidence session on worker exploitation. The Commission considers matters which include regeneration, public transport and cycle and car provision, tourism, adult learning and job provision.

We understand that some information might be regarded as sensitive and, in this instance, would encourage you to submit this to either the secretary of the Scrutiny Commission, Dr Ed Brown (edmund.brown@leicester.gov.uk) or the University of Leicester research lead, Prof Nik Hammer (nh80@le.ac.uk). Any information received in this regard will be treated confidentially. Equally, you can submit your views to edmund.brown@leicester.gov.uk should you be unable to attend.

The information gathered will form part of a report that will be published by the Scrutiny Commission at a future date in 2025. The report will not name any individuals but may, in some instances refer to organisations. Please note, however, that anything highlighted to us as confidential in the process will be treated as such by the Commission and the research team and be appropriately protected in the report.

Name of your organisation: Health and Safety Executive

What aspects of worker exploitation is your organisation concerned with?

Health, safety and welfare of workers

How do you gain access and/or gather information about this type of worker exploitation?

HSE Inspectors have the power of entry to carry out a workplace inspection or to investigate a concern or incident.

Information can be from:

- Concerns raised direct to HSE
- Frontline Inspections to workplaces
- Accidents/Incidents in workplaces that require investigation
- Shared intelligence from other labour market enforcement bodies

What aspects of worker exploitation, requests for support etc, do you track systematically, e.g. in administrative databases?

Internal record keeping used to track intelligence sharing.

Worker exploitation is not a defined category for reportable incidents (RIDDOR) however records kept where breaches of health and safety regulations are found and enforcement action taken.

Do you have indications that beyond the data you gather, there is any further, hidden, worker exploitation?
No
In your experience, are the forms of worker exploitation you encounter more prevalent in specific forms of business organisation (gig economy, supply chains, etc)?
Poor management of health and safety can indicate poor business management in general. Industries with low pay, poor supervision and use non-standard employment contracts can be associated with non-compliance of regulations.
In your experience, are the forms of worker exploitation you encounter more prevalent in specific localities, sectors, gender, ethnicity, etc?
HSE data does not cover all these categories.
Have there been any notable increases/declines in worker exploitation in your experience?
no
What, in your view, are the drivers of worker exploitation?
Poor working conditions, general poor management of a business and lack of understanding of worker rights
How do you address the worker exploitation or requests for support you encounter?
All workers are protected under health and safety law. Where breaches of health and safety regulations are found, HSE has a range of enforcement powers to take.
Do you report any incidence of worker exploitation to other organisations/agencies?
Intelligence is shared with other labour market enforcement bodies, agencies and regulatory bodies as appropriate
Do you collaborate with other organisations/agencies with regard to worker exploitation? Which ones?
HSE works in partnership where relevant, including data sharing, participation in joint initiatives and contributing to wider, more strategic discussions. This can include, GLAA, HMRC NMW, DWP, Local Authorities, Immigration Enforcement, NCA or Police
Is there anything specific the local Council could do to support labour market enforcement?
Each Local Authority has co-regulatory responsibility for health and safety and must make adequate enforcement provision under the Health and Safety (Enforcing Authority) Regulations 1998 (EA Regulations)
Is there anything else you would like to add/we should pay attention to?
HSE is responsible for workplace health, safety and welfare. It is not a first responder under Modern Slavery legislation and does not refer potential MS victims to the National Referral Mechanism.

Labour Market: Worker Exploitation Economic Development, Transport and Climate Emergency Scrutiny Commission

Stakeholder questionnaire

The City Mayor's Strategic Plan commits to tackle non-compliance across all sectors that may be blighted by low pay and poor conditions. This questionnaire is part of a collaboration by the Scrutiny Commission with the University of Leicester aiming to gather information on the monitoring, incidence, and practices of worker exploitation across different sectors in Leicester. For these purposes, worker exploitation is seen as a continuum stretching from low pay to poor conditions or Modern Slavery.

Given your expertise worker/community engagement and in combatting specific aspects of worker exploitation, Leicester City Council (Economic Development, Transport and Climate Emergency Scrutiny Commission) would like to invite you to complete this questionnaire prior to the evidence session on worker exploitation. The Commission considers matters which include regeneration, public transport and cycle and car provision, tourism, adult learning and job provision.

We understand that some information might be regarded as sensitive and, in this instance, would encourage you to submit this to either the secretary of the Scrutiny Commission, Dr Ed Brown (edmund.brown@leicester.gov.uk) or the University of Leicester research lead, Prof Nik Hammer (nh80@le.ac.uk). Any information received in this regard will be treated confidentially. Equally, you can submit your views to edmund.brown@leicester.gov.uk should you be unable to attend.

The information gathered will form part of a report that will be published by the Scrutiny Commission at a future date in 2025. The report will not name any individuals but may, in some instances refer to organisations. Please note, however, that anything highlighted to us as confidential in the process will be treated as such by the Commission and the research team and be appropriately protected in the report.

Name of your organisation:

What aspects of worker exploitation is your organisation concerned with?

Garment workers in garment factories around Leicester, Highfields, Evington and the City centre.

How do you gain access and/or gather information about this type of worker exploitation?

- During the 2020 covid pandemic Leicester was placed in the spotlight as we had tighter and longer covid restrictions than other counties in the UK and stayed in lockdowns longer, the reason cited in the media for the prolonged restrictions was the garment factories. Due to this media scrutiny the TUC, GMB and Unite along with fast Fashion Brands, Boohoo, I Saw It First, In The Style, Missguided, River Island, New Look, ASOS and Yours came together to form a steering group.

- From the steering group a document was formed the JRI (joint responsibility initiative) and a partnership with the local community centre the Highfields centre and the appointment of two community support workers was decided.
- JRI (Joint Responsibility Initiative) is a voluntary binding agreement between brands, suppliers and trade unions, supply chain due diligence, transparency, purchasing practices
- Two Community support workers hired through the Highfields Centre gained access to factories started to build trust and promote services
- Following a few factory visits it became clear that the factories were sometimes an oppressive environment to have open conversations and engage, the Fashion Workers Club was established based at the Highfields Centre once a week on a Thursday, light refreshments and childcare was provided, access to computer skills class and ESOL classes, GMB attended, and social welfare advice provided
- GMB met with all brands, discussed what we were looking for and visited factories at the first meeting with employers with the brands present
- GMB visited factories under ASOS, Yours and I Saw It First and started to establish a workplace agreement, started to put posters up in factories and visited over lunch breaks to talk direct to garment workers with the aid of the community support workers and made leaflets in different languages
- The GMB offered factories free health and safety inspections
- GMB attended the Labour Behind the Labels rally for the 1% campaign on 1 October and we spoke at the event, this rally was attended by well over 500 workers
- GMB arranged a rally in December to talk at the clock tower in the town centre about the plight of Leicester Garment Industry, we invited an MP but they did not come to speak, we invited factory owners and garment workers to speak but they did not come, community support workers came and spoke and GMB and Unite spoke as well
- GMB arranged a meeting between GMB, Unite and factory owners, sent the invite to over 30 factory owners only 5 showed up, we wanted to create a collective for factory owners to have more power over fast fashion brands
- GMB attended lots of community events, an awards night for garment workers achievements, a screening of a documentary on the garment workers in Leicester and the May Day event at the Highfields Centre where we held a stall
- The GMB contributed to Leicester University research piece of the garment industry and the manufacturing model
- The GMB attended an event at the Wesley Community Centre where Labour Behind the Label launched a workers rights toolkit, GMB is in useful contacts and is mentioned in the section on Unions, we had a meeting with a woman who runs a local advice service and she has access to 1200 migrant workers in Leicestershire and she joined the union and we are encouraging her to become a rep

What aspects of worker exploitation, requests for support etc, do you track systematically? Do you keep records?

GMB members and their cases go through our regional officers advising them and monitoring their case, the Highfields centre project workers have a case load reporting tool.

Do you have indications that beyond your worker engagement activities, there is any further, hidden, worker exploitation?

Factories not paying correct hours, so 15 hours put through PAYE but work 40 hours, rest of the hours is cash in hand or just not paid so the garment worker is only working for half the minimum wage. When the factory has no work, workers are laid off with a letter that just states your contract has ended so no redundancy regulations or payment, the workers are then taken back on after a few months with a new contract so now they have a new start date and no length of service. Garment workers are automatically enrolled in a pension as per regulations but then many choose to opt out, so no pension provisions in the industry. No longevity of work so it is a precarious sector. Fast Fashion brands are exploiting factory owners by pushing the price down knowing that factory owners can not afford to pay national minimum wage and for the materials without making cuts somewhere, no enforceable purchasing practice and brands can just choose to outsource abroad if factory owners defend the prices.

In your experience, are the forms of worker exploitation you encounter more prevalent in specific forms of business organisation (gig economy, supply chains, etc)?

Garment factories, small self-employed factory owners taking on staff and not regulated, factories go bust and workers left with no jobs, frequent occurrence so no repercussions.

In your experience, are the forms of worker exploitation you encounter more prevalent in specific localities, sectors, gender, ethnicity, etc?

In Leicester city centre area, Highfields and Evington, in garment factories made up of South Asian, Eastern European and Portuguese Goan Indians.

Have there been any notable increases/declines in worker exploitation in your experience?

Covid saw an increase at a rapid rate of orders being placed in Leicester garment factories. Post covid, fast fashion brands started outsourcing abroad again as it was cheaper which saw a big decline and factories closing.

What, in your view, are the drivers of worker exploitation?

Fast fashion brands outsourcing abroad and no repercussions for brands, no local or government procurement contracts in Leicester for PPE or uniforms, no steady work all year around it's constantly precarious work. New arrivals to the UK struggle to find work and garment factories sometimes become the only option which leaves them open to exploitation when it comes to not receiving the national minimum wage or decent terms and conditions.

How do you address the worker exploitation or requests for support you encounter?

A Union officer represents our members at grievances, disciplinaries, members settlements or helping to get a members job back when redundancy policies were not followed, if we suspect a business of not paying the minimum wage we have tried to report this to HMRC but they told us to report it to ACAS who didn't do very much with it so not really sure if that system works? We also notify the brand if the factory is supplying a certain brand. If we get any reports of employers asking employees to get cash out of the bank after they have been paid to repay the employer we advise to report this to the police, also the same would apply if a member reported any kind of abuse.

Do you report any incidence of worker exploitation to other organisations/agencies?
HMRC, ACAS, Employment Tribunal service, report to fast fashion brands, if any criminal issue we tell members they must report to the police.
Do you collaborate with other organisations/agencies with regard to worker exploitation? Which ones?
Highfields Centre, Wesley Hall Community Centre, Labour Behind the Label, TUC, Unite and fast fashion brand ethical compliance officers.
Is there anything specific the local Council could do to support labour market enforcement?
<p>We want Leicester to have a good reputation as currently it's got the sweat shop tag and unethical, it's hidden in plain sight.</p> <p>As it's currently the HSE responsible for health and safety in factories is there a joined-up approach with councils on visiting premises and who gets sent the reports?</p> <p>Will there be community grants for local businesses to grow and survive?</p> <p>Can the local council stipulate or through government that fast fashion brands source a certain number of products from the local area if selling products to the UK?</p> <p>Could the council source some insourcing like uniforms, PPE from Leicester factories?</p> <p>Gang Masters and Labour Abuse Authority and Operation Tacit in 2020, Operation Tacit sent enforcement agencies into factories during 2020, in August 2022 the director Margaret Beels visited Leicester and led a review into whether operation tacit was successful, we have not seen the review and we checked on the government website and the review is not yet published.</p>
Is there anything else you would like to add/we should pay attention to?
<p>We would like to see the garment industry and its workers lifted out of poverty, once out of poverty the advantages for the local economy is spending in the local economy when people have more money, it can reduce homelessness and temporary accommodation and reduce the number of unemployed people, unsure where all the garment workers that have lost their jobs will be able to source new work from.</p> <p>We would like to see remedy for workers as:</p> <p>Must be paid the national minimum wage, but ideally in the future we would like a cost of living wage</p> <p>A safe working environment</p> <p>Accountability with brands that if there are problems in the supply chain then they will be penalised</p> <p>Brands have to produce a certain percentage of clothes sold in the UK in the UK</p> <p>Call out brands that are part of the ETI that have issues with supply chain</p>

Promote success of factories that are operating fairly so there is a distinction between good and bad and make sure the bad examples are publicised and the good get orders and positive press so that we can save what is left of the garment industry in Leicester

Appendix 7

Labour Market: Worker Exploitation Economic Development, Transport and Climate Emergency Scrutiny Commission

Stakeholder questionnaire

The City Mayor's Strategic Plan commits to tackle non-compliance across all sectors that may be blighted by low pay and poor conditions. This questionnaire is part of a collaboration by the Scrutiny Commission with the University of Leicester aiming to gather information on the monitoring, incidence, and practices of worker exploitation across different sectors in Leicester. For these purposes, worker exploitation is seen as a continuum stretching from low pay to poor conditions or Modern Slavery.

Given your expertise worker/community engagement and in combatting specific aspects of worker exploitation, Leicester City Council (Economic Development, Transport and Climate Emergency Scrutiny Commission) would like to invite you to complete this questionnaire prior to the evidence session on worker exploitation. The Commission considers matters which include regeneration, public transport and cycle and car provision, tourism, adult learning and job provision.

We understand that some information might be regarded as sensitive and, in this instance, would encourage you to submit this to either the secretary of the Scrutiny Commission, Dr Ed Brown (edmund.brown@leicester.gov.uk) or the University of Leicester research lead, Prof Nik Hammer (nh80@le.ac.uk). Any information received in this regard will be treated confidentially. Equally, you can submit your views to edmund.brown@leicester.gov.uk should you be unable to attend.

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Name of your organisation: Crimestoppers Trust UK

What aspects of worker exploitation is your organisation concerned with?

Raising awareness of what exploitation looks like, highlighting signs to spot and empowering the community to report information about this crime type anonymously

How do you gain access and/or gather information about this type of worker exploitation?

Encourage members of the public to report information
Data shared by partners

What aspects of worker exploitation, requests for support etc, do you track systematically? Do you keep records?

All reports made are deleted after 28 days. Although we do log and track the crime types the reports are made about, when made, location of crime reported

Do you have indications that beyond your worker engagement activities, there is any further, hidden, worker exploitation?
No
In your experience, are the forms of worker exploitation you encounter more prevalent in specific forms of business organisation (gig economy, supply chains, etc)?
N/A
In your experience, are the forms of worker exploitation you encounter more prevalent in specific localities, sectors, gender, ethnicity, etc?
N/A
Have there been any notable increases/declines in worker exploitation in your experience?
<p>In 2023 there were 435 reports received by Crimestoppers specifically about Modern Slavery, in 2024 there were 325 (nationally)</p> <p>This does not mean that there were not other types of worker exploitation reported, they may have been captured in other reports relating to other crime types such as drugs</p>
What, in your view, are the drivers of worker exploitation?
How do you address the worker exploitation or requests for support you encounter?
N/A
Do you report any incidence of worker exploitation to other organisations/agencies?
<p>Yes</p> <p>Relevant law enforcement agency</p>
Do you collaborate with other organisations/agencies with regard to worker exploitation? Which ones?
<p>Yes</p> <p>We work with all agencies in raising awareness of exploitation such as NCA, MDS helpline etc</p>
Is there anything specific the local Council could do to support labour market enforcement?
?
Is there anything else you would like to add/we should pay attention to?

Labour Market: Worker Exploitation Economic Development, Transport and Climate Emergency Scrutiny Commission

Stakeholder questionnaire

The City Mayor's Strategic Plan commits to tackle non-compliance across all sectors that may be blighted by low pay and poor conditions. This questionnaire is part of a collaboration by the Scrutiny Commission with the University of Leicester aiming to gather information on the monitoring, incidence, and practices of worker exploitation across different sectors in Leicester. For these purposes, worker exploitation is seen as a continuum stretching from low pay to poor conditions or Modern Slavery.

Given your expertise worker/community engagement and in combatting specific aspects of worker exploitation, Leicester City Council (Economic Development, Transport and Climate Emergency Scrutiny Commission) would like to invite you to complete this questionnaire prior to the evidence session on worker exploitation. The Commission considers matters which include regeneration, public transport and cycle and car provision, tourism, adult learning and job provision.

We understand that some information might be regarded as sensitive and, in this instance, would encourage you to submit this to either the secretary of the Scrutiny Commission, Dr Ed Brown (edmund.brown@leicester.gov.uk) or the University of Leicester research lead, Prof Nik Hammer (nh80@le.ac.uk). Any information received in this regard will be treated confidentially. Equally, you can submit your views to edmund.brown@leicester.gov.uk should you be unable to attend.

The information gathered will form part of a report that will be published by the Scrutiny Commission at a future date in 2025. The report will not name any individuals but may, in some instances refer to organisations. Please note, however, that anything highlighted to us as confidential in the process will be treated as such by the Commission and the research team and be appropriately protected in the report.

Name of your organisation: Wesley Hall Community Centre

What aspects of worker exploitation is your organisation concerned with?

We have had reports of people being paid less than the minimum wage in garment factories.

How do you gain access and/or gather information about this type of worker exploitation?

Through people coming to use the food pantry and asking us to help them find employment, as well as through outreach programmes and research for universities.

What aspects of worker exploitation, requests for support etc, do you track systematically? Do you keep records?

We do not have specific records, but we could most likely recall individual cases. We have some instances recorded in university transcripts.

Do you have indications that beyond your worker engagement activities, there is any further, hidden, worker exploitation?
We expect that there is activity that is not reported to us.
In your experience, are the forms of worker exploitation you encounter more prevalent in specific forms of business organisation (gig economy, supply chains, etc)?
We have experience of occurrences in supply chains.
In your experience, are the forms of worker exploitation you encounter more prevalent in specific localities, sectors, gender, ethnicity, etc?
We have had direct reports of poor conditions and low pay in the garment sector and poor conditions in food factories. We have also had reports of exploitation in the care sector through visa fraud.
Have there been any notable increases/declines in worker exploitation in your experience?
There have been fewer reports since the garment factory closures, following lock down in 2021, but this does not necessarily mean there are fewer cases, it could be that they are not being reported.
What, in your view, are the drivers of worker exploitation?
In the garment industry, unrealistically low prices are demanded by fast fashion retailers, orders are unreliable and it is an easy business model for people to exploit as there are plenty of willing workers, despite low pay and poor working conditions, due to restricted access to alternative options (language barriers, access to transport, immigration status etc).
How do you address the worker exploitation or requests for support you encounter?
We offer support accessing universal credit, housing benefits, our food pantry and ESOL classes. We also refer to training courses, job clubs and FAB-L.
Do you report any incidence of worker exploitation to other organisations/agencies?
We raise awareness through advocacy and work with NGOs such as Labour Behind the Label.
Do you collaborate with other organisations/agencies with regard to worker exploitation? Which ones?

LBL, Justice in Fashion, Shama Centre, FAB-L at Highfields Centre, FTA Workers Rights Training (promoted, but no enrolments so far) and Hope for Justice.

Is there anything specific the local Council could do to support labour market enforcement?

Incentivise good practice. Engage with factory owners and offer help and support for them to transition away from fast fashion manufacturing to instead produce apparel for customers with higher price points and long-term commitments. Help them to attract these customers through support investing in environmental innovations such as solar panels, circular processing, chemical free dye processes, regenerative fabric production and safe and comfortable working conditions. Help them to understand the benefits and to strive to achieve different accreditations such as B-Corp, SEDEX, Soil Association, and Fair trade certification. Help them to navigate incoming European and UK legislation and the necessity to comply to future-proof their businesses.

For those that continue to choose the fast fashion route, have stricter penalties for landlords who let factory buildings go into disrepair, and stricter penalties and policing of non-compliance of fair labour practices. Engage with brands and retailers to foster a collaborative approach to tackling workers rights and climate issues, working together with suppliers for mutual benefit.

Employ a local garment trade adjudicator and office to implement this.

Is there anything else you would like to add/we should pay attention to?

A local garment trade adjudicator would be beneficial in tackling the issues of exploitation in the garment sector as well as engagement with factory owners and workers themselves, not just retailers and brands, ensuring a collaborative rather than a top down approach to compliance.

Economic Development, Transport and Climate Emergency Commission

Evidence from Highfields Centre: Worker Exploitation Scrutiny

Introduction

We are pleased to present the following evidence to the Worker Exploitation Scrutiny sharing insights, experience and intelligence we have gathered, informed by our direct contact with over 1579 garment workers in the city summarised in this report. We have helped 579 clients with over 1300 cases related to housing, social welfare, and employment rights.

Background and Context

While the issues have been known for some time, the widespread media coverage of the less salubrious aspects of the garment industry had given rise in 2020 to a very wide range of agencies (including brands, unions, NGO's, regulatory bodies, community groups and local councils) forming the Apparel and General Merchandising Public/Private Protocol (AGM-PPP) to provide an effective platform for multi-stakeholder collaboration and for a coordinated approach to achieving improvements in working conditions in these UK supply chains.

Highfields Centre (HC) provided the base for the outreach workers, as it is in the heart of Leicester's garment factory area and has already well-established links with the community. The HC motto is 'Enhancing Lives, Empowering Communities & Enterprise for All' and it has played a leading role in supporting many major developments in the Greater Highfields area over the last 40 years.

FAB-L (Fashion-workers Advice Bureau – Leicester) is a community led project that initially employed two outreach community workers who were able to connect and build trust with garment workers and a wide range of agencies (including community groups, brands and unions) to provide support, advice, information, and assistance to garment workers, and build a vibrant and supportive community hub. Its mission is achieved by

- Preventing the exploitation of workers
- Raising awareness to prevent the exploitation of workers
- Protecting vulnerable and exploited workers
- Contributing to disrupting exploitative practices
- Protecting the rights of all workers and promoting decent work, ensuring the inclusion of worker and community voice
- Providing evidence-based guidance and input to business, local and national stakeholders that support the vision of a thriving garment industry in Leicester

Overview of Fashion Advice Bureau - Leicester (FAB-L)

The Fashion-workers Advice Bureau – Leicester (FAB-L) was established in November 2021 and commenced its services in January 2022 to focus on a specific type of exploitation e.g. wage theft, forced labour, human trafficking, health and safety violations, minimum wages.

Since its start in 2021, FAB-L has been a voice for garment workers. Over the last three years, we have stood by workers facing wage theft, exploitation, and unfair dismissals. Despite all the hurdles, we remain resilient, committed, and determined to make sure these workers are heard and that their rights are protected.

Highfields Centre also offers language and integration activities to FAB-L clients:

- We have expanded **ESOL and English classes** to help workers and their families integrate into the workforce and society.
- Created an environment for **Safe Reporting**: Maintaining the Fashion Workers Club as a confidential and safe space for workers to report exploitation and slavery concerns without fear.
- Offer **Welfare & Benefits advice and guidance**, particularly for those facing unfair dismissal or factory closures.
- Assisting workers with **Employment Support** in finding jobs—whether it is in the garment industry or another sector—to help alleviate poverty.
- **Advocacy**: Pushing hard for better working conditions for garment workers and encouraging brands to bring production back to the UK.

FAB-L's emphasis is to connect with garment workers by undertaking Outreach work - our workers on the ground have conducted a mapping exercise to establish where the textile hubs, factories and units are situated within the Greater Highfields, Belgrave and Rushey Mead areas.

We work closely with our sponsors (currently ASOS, River Island, Yours Clothing & Garment & Textile Workers Trust) who fund our project and their brand auditors allow us access to the garment workers to promote the project and offer any advice and help that's needed from us to improve their situations within their workplace, and provide for better knowledge of their legal rights in terms of employment, wages and entitlements.

By sharing our publicity and contact information, many garment workers have contacted us discreetly to get further information and advice in relation to workplace issues including unfair dismissal, missing wages leave and redundancy entitlements.

In the following section we outline our responses to the questions posed by the scrutiny commission

1. Track Record

FAB-L specialise in providing support and advice for fashion workers in Leicester. Our team provide access to advice on workers' rights within the textile and fashion industry.

Worker rights and support has also been made to empower workers through education and support services. Organisations like the Leicester-based trade union, Unite, and other grassroots movements have worked with FAB-L to provide migrant workers with knowledge of their rights and to create channels through which they can report exploitation without fear of deportation or job loss. Additionally, labour rights training and support services are being offered to help workers understand their legal entitlements.

Key Achievements in Years One to Three (2022-24):

Financial Recovery:	We reclaimed £170,000 in missing wages for workers who were victims of wage theft. Year 1 £60,000 from 2 factories - Year 2 £54,000 – Year 3 £56,000 Total £170,000 over the 3years.
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Casework Support	We provided over 1000+ hours of casework, valued at £100,000, covering wage theft, dismissals, and unsafe working conditions
Benefits Access	We helped workers access £100,000+ worth of benefits and welfare support from <ul style="list-style-type: none"> - Project registrations - Case handling - Reporting progress on help and support offered - Exit interviews - Recorded outcome from individual and which key person or individuals helped us to resolve their queries (support from brands, unions, ACAS, HMRC).

2. Monitoring and Tracking

Incident Management Systems

- We use tools like Lamplight and Advice Pro to log and track incidents or requests for support.
- These tools provide ticketing systems where each issue is assigned a unique ID
- These systems effectively capture crucial service user information, i.e. personal details (gender, etc) provide a unique case number/reference it's a helpful system to record key inputs and outcomes.

3. Common Signs of Hidden Exploitation

Uncovering hidden worker exploitation requires careful examination beyond visible indications. Exploitation can often remain obscured due to deliberate concealment or systemic issues.

Based on our experience, we would suggest the following indicative ways to assess and investigate hidden worker exploitation.

Common Signs of Hidden Exploitation	Behaviours/Evidence
Inconsistent Data or Reports	<ul style="list-style-type: none"> • Discrepancies between reported hours and pay. • Unexplained patterns in absenteeism or high employee turnover.
Worker Behaviour	<ul style="list-style-type: none"> • Reluctance to report grievances or engage in open communication. • Fearful or overly deferential behaviour, indicating intimidation
Unusual Employment Practices	<ul style="list-style-type: none"> • Use of intermediaries or subcontractors without clear oversight. • Excessive use of temporary, casual, or gig workers who lack formal contracts.
Living or Working Conditions	<ul style="list-style-type: none"> • Poor housing or living conditions for workers. • Evidence of workers being transported or housed together under restricted circumstances.
Third-Party Complaints or Reports	<ul style="list-style-type: none"> • Reports from unions, NGOs, or whistleblowers alleging unethical practices. • Social media or local community concerns about workplace conditions

4. Methods to Investigate Hidden Exploitation

Methods	Focus areas
Worker Interviews	<ul style="list-style-type: none"> Conduct confidential and anonymous interviews to encourage honesty. Use third-party auditors to build trust and avoid bias.
Audit Employment Records	<ul style="list-style-type: none"> Review contracts, payroll data, and hours worked. Check for discrepancies that may indicate underpayment or unpaid overtime.
Engage Independent Audits	<ul style="list-style-type: none"> Use specialised firms to conduct surprise or in-depth audits of practices. Include audits of sub-contractors and suppliers.
Surveys and Feedback Mechanisms	<ul style="list-style-type: none"> Implement anonymous feedback channels, such as suggestion boxes or digital apps. Regularly survey employees on their working conditions
Collaborate with Stakeholders	<ul style="list-style-type: none"> Work with unions, local NGOs, and regulatory bodies to gather insights. Investigate flagged areas or industries known for exploitation risks.
Technology as a Tool for Detection	<ul style="list-style-type: none"> AI-Powered Analysis: Use data analytics to identify anomalies in wages, hours, or productivity that may signal exploitation. Blockchain for Transparency: Implement blockchain systems in supply chain management to track fair labour practices. Social Listening Tools: Monitor social media and online forums for complaints related to labour practices.

5. Addressing Potential Findings

If hidden exploitation is uncovered, here are some suggestions for action:

- Rectify the Issues Immediately - Ensure affected workers are compensated and conditions improved.
- Strengthen Oversight - Increase monitoring and reporting frequency, especially for high-risk areas.
- Educate the Workforce - Provide training on their rights and grievance mechanisms.
- Enhance Transparency- Commit to regular public reporting on labour practices.

6. Identifying forms of worker exploitation (Audience and Locality)

If a particular industry or business model (e.g., gig economy, Garment industry, Car wash, Care industry Food industry, Restaurants) is a primary concern, our work could target specific industries or workers affected by these practices. This could be done through tailored messages that resonate with people working in those fields.

Some of the wider challenges are identifying these freelance workers and individuals as there is less accountability, low pay zero contractors, no job security – therefore, they can be easily open to exploitative practices. This practice is well found in the garment industry and that is what is often sold to vulnerable community groups to exploit them in this sector.

Brands often known as the BUYER will approach the factory owners, send sketches/designs once the factory makes a sample and the factory owner then relays their associated factories for the garment/item. We have found that brands often negotiate terms at the lowest possible price which hardly equates to hours spent on creating a clothing piece. This suggests brands often exploit the factory, with the latter forced to take on work to continue their business and for the brand not to drop them.

7. Identifying forms of worker exploitation (Gender, Ethnicity)

Exploitation is more common in certain localities, (e.g. gig economy garment industry), we have found as part of this project new arrival communities, **South Asian communities and Eastern Europeans** are often exploited and in recent times, we have seen **refuges and asylum seekers** also doing cash in hand work.

Garment sector workers are often **women** - they are targeted as they do not raise their voice or concerns within the workplace and are fearful of losing their jobs.

We have seen some cross over in other work sectors for example food, car washes, hospitality and care work being exposed to the same.

8. Increases/declines in worker exploitation in your experience

Since the FAB-L project commenced 3 years ago, we have found the problem still exists and often it hides and resurfaces every so often. The exploitative practices are often targeted to the most vulnerable people we work with who come with significant barriers or lack of access to any IAG (Information, Advice & Guidance) service via government, council or voluntary sector support, and often living in shared accommodation, with the latter having language barriers and are new to the city, so unaware of where to get the necessary help to access systems and support.

Our experience has highlighted that a key driver for worker exploitation is the lack of legal protections, poverty, systemic inequality, corporate greed, societal and environmental factors – to meet an individual's basic needs.

The way in which we address the worker exploitation or requests for support we encounter is as follows:

- First gather facts, information, root cause to understand individual case
- The project then creates an individual case where it takes the necessary steps and interventions to support that individual
- This could be independently or with NGO's, Unions, law services and brands to facilitate a meeting with the employer to resolve any workplace disagreements.

We report any incidence of worker exploitation to other organisations and agencies that includes the following as collaboration is crucial to tackling worker exploitation:

GLAA, (Gangmaster and Labour Abuse Authority) HMRC, (Her Majesty's Revenue & Customs, CAB (Citizens Advice Bureau) APL, (Association of Labour Providers) FAST FORWARD, REASSURANCE NETWORK, LABOUR BEHIND THE LABEL & UNIONS.

9. Support for Labour Market enforcement

If there is a policy aspect, we target local government officials with a petition or a call to action, urging them to strengthen labour laws and enforcement.

1. Health & Safety and Building regs - Implement legislation and check liability insurance on these businesses
2. Offer community organisations funding and support for business re-growth opportunities
3. Offer free training in different job sectors to support many garment workers who have lost their jobs due to the businesses moving abroad to cut costs.

Summary and Recommendations

We believe that that local council has a vital role to play in tackling worker exploitation across Leicester's labour market: -

1. Take a direct lead on tackling Modern Day Slavery that resonate across the city, empower, and employ more local people who understand the community demographics and hardships better
2. Invest in organisations that are in regular contact with workers and have their trust and confidence to provide support, IAG and advocacy.
3. Support factory bosses/ companies with grants to re-establish self-employment and create jobs for others
4. Increase publicity around breaking the Law and enforce fines for malpractices
5. Increase publicity for workers to access help in multiple languages and a face-to-face service as many are digitally excluded
6. Implement research findings to investigate issues and focus on sub sectors/particular demographic that is underserved, or an emerging issue
7. It is important to approach the subject ethically, ensuring that data collection respects the privacy, safety, and dignity of those involved.

End

Priya Thamotheram – Senior Joint Head of Centre

Vandna Gohil – Joint Head of Centre

Fatimah Li – Deputy Head of Centre & FAB-L Team Leader

Ellias Mussa – Social Welfare Advocacy Worker, FAB-L

27 January 2025

Modern Slavery Submission

Adult Social Care

The Interface between Modern Slavery, Adult Social Care (ASC) duties and Safeguarding

Context

Modern Slavery, although present in our society and a local risk to be alert to, has a very limited presence in ASC work. This is due to the primary role of ASC in supporting people with needs of care and support arising from a disability or illness. As Modern Slavery is most commonly linked to people who are able to work, including younger people, there is a relatively limited interface between people requiring ASC support and people at risk of Modern Slavery.

That said, it is understood that people with care and support needs may be at risk of exploitation and abuse via Modern Slavery and there have been some high-profile incidents.ⁱ A report on the interface between Modern Slavery and safeguarding adults work has been published.ⁱⁱ

It should be noted that data is limited; Modern Slavery is captured as a category of abuse in a safeguarding context but it is not a 'primary client type' – therefore it is not captured more widely in ASC records. Operational intelligence is that this is a very limited presenting issue.

The role of Adult Social Care

The primary contribution of ASC in addressing concerns about Modern Slavery can be summarised as:

- The provision of Advice, Information and Guidance.
- Ensuring staff are aware of Modern Slavery and are alert to any signs.
- Ensuring people with care and support needs, who may experience or be at risk of Modern Slavery, are supported and concerns appropriately investigated (safeguarding).
- Participating in partnership work as appropriate.

Advice, Information and Guidance

Many people approach ASC, sometimes without a clear understanding of the role and remit of the statutory provision. Approximately one third of people who contact us do not have an identified need for ASC support. Of those contacts recorded as a potential need for support, 70% of people are then supported with advice, information and guidance, including being signposted to other services. A significant

proportion of contacts are made by a third party (i.e. not the individual requiring support). Therefore, the role of ASC in providing advice, information and guidance is important.

Whilst it is a rarely presented issue, staff are trained in identifying Modern Slavery and would signpost people to appropriate support including the National Referral Mechanism. Where another professional may be referring, the conversation would establish whether the person had any need for care and support, indicating safeguarding procedures should be followed. As there is no data about these contacts relation to Modern Slavery (as noted above), operational intelligence is that this is a very limited presenting issue. This is supported by the data that we do have, in relation to safeguarding concerns.

Ensuring Staff Awareness

Staff training is covered within the mandatory ASC safeguarding training, both the Learning Pool Mandatory Training on Safeguarding Adults (for all staff) in terms of signs and indicators and it is further covered in the face to face 1 day course aimed at social workers and social care practitioners.

Ensuring People with Care and Support Needs are Safeguarded

The statutory guidance for Adult Safeguarding includes Modern Slavery as a category of abuse. It is further specified in the Care Act 2014 guidance:

14.2 The safeguarding duties apply to an adult who:

- **has needs for care and support (whether or not the local authority is meeting any of those needs) and**
- **is experiencing, or at risk of, abuse or neglect and**
- **as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect**

14.7 Modern slavery encompasses:

- **slavery**
- **human trafficking**
- **forced labour and domestic servitude.**
- **traffickers and slave masters using whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment**

There are shared Multi-Agency Safeguarding Adult Procedures across Leicester, Leicestershire and Rutland. These guide practice, where we might identify Modern Slavery risks for a person with care and support needs. An alert (initial concern) may be logged and if it meets the threshold for safeguarding, an enquiry (investigation) will be commenced. An enquiry can be categorised against one or more forms of abuse.

In 2023 / 24, there were 2 recorded enquiries which included Modern Slavery as a category of abuse. Reviewing the data for this report, it was identified that one was incorrectly categorised. The second was not found to involve Modern Slavery, upon investigation. Both were more correctly categorised as financial abuse, as there was no 'slavery' element to the reported concern.

Participating in Partnership Work

The primary partnership is the Leicester City Safeguarding Adults Board, and its subgroups, that work across LLR. This includes the Performance Subgroup, where data is reviewed, including the prevalence of Modern Slavery in safeguarding incidents. The picture in Leicester is replicated in Leicestershire and Rutland.

In June this year the Police and Crime Commissioner co-ordinated a Round Table discussion which led to re-establishing the Leicester, Leicestershire and Rutland Modern Slavery Action Group.

Adult Social Care participates in the group, intended to promote collaborative working between the agencies involved in identifying and addressing issues of Modern Slavery, human trafficking and exploitation.

Ruth Lake

Director, ASC and Safeguarding

3rd December 2024

ⁱ <https://www.bbc.co.uk/news/uk-england-south-yorkshire-25642431>
[Lithuanian gangmasters jailed in modern slavery and trafficking case | Immigration and asylum | The Guardian](#)

ⁱⁱ [Modern slavery – the adult safeguarding interface](#)

Press release

For immediate release

24 October 2023

Modern slavery helpline reveals huge increase in care worker victims

The number of care workers contacting the Modern Slavery & Exploitation Helpline has rocketed, according to a new report from anti-slavery charity Unseen.

Many of these workers are from overseas, and have paid huge fees to unscrupulous employers or recruitment agencies to come to the UK on special visas designed to fill vacancies in the care sector.

Often the workers do not understand their rights in the UK, which leaves them vulnerable to further abuse.

Take Janet (we've changed her name to protect her identity), who was recruited from Zimbabwe to work in a residential care home. She did not receive a contract, and her employer charged her £10,000 for a certificate of sponsorship (in reality this costs a few hundred pounds and the cost is often met by the employer). She was then forced to work more than her agreed hours, sometimes working 18-hour shifts for up to 10 days in a row.

The report reveals the following:

- A 606% increase in care work-related modern slavery cases reported by the Helpline in the year to the end of 2022
- 712 potential victims of modern slavery in 2022 indicated to the Helpline (by care workers themselves or others) up from 106. This is an increase of more than 1,000%
- In the first six months of 2023, care workers indicated to the Helpline had an average debt of £11,800, to pay for recruitment, visa and travel costs
- Between January and June 2023 the Helpline recorded that 25 different nationalities were affected by this exploitation, with 96% of potential victims indicated as being from Asian or African countries.

Says Andrew Wallis OBE, CEO of Unseen:

"This report shows that the current approach of recruiting overseas to address a chronic shortage of care staff in the UK is a disaster for many workers. As the employee supply chain has got longer and more complicated, labour abuse and exploitation has increased.

“The Home Office needs to better apply existing laws, particularly the principle of no recruitment fees imposed on the employee, and to ensure proper scrutiny of the employee supply chain by UK care companies and recruitment agencies. It is individual workers who are paying the price of this neglect.

“We need to learn the lessons of the Seasonal Worker Scheme, which was also intended to plug a gap using overseas workers and led to many instances of labour abuse in the agricultural sector.”

Case study

Divya (we’ve changed her name to protect her identity) came to the UK from India to work in the care sector. She was housed with four other care workers. Their employer took their passports and ordered them to sign a three-year contract with the care company.

Divya worked in domiciliary care. Often her employer would drive her to and from clients’ homes. She would complete a 12-hour shift with one client and then be expected to go straight into another 12-hour shift supporting another client, often working longer than 24 consecutive hours without breaks.

A concerned client let her sleep during a shift and provided her with food, as Divya was not earning enough money to buy provisions.

Notes to editors

More information

You can download a copy of the full report at: https://www.unseenuk.org/wp-content/uploads/2023/11/unseen-Care-Sector-report_spread-2023.pdf

For all press enquiries, contact media@unseenuk.org or phone 0303 040 2888.

About Unseen

Unseen is working towards a world without slavery. We provide safehouses and support in the community for survivors of trafficking and modern slavery. We also run the UK Modern Slavery & Exploitation Helpline and work with individuals, communities, businesses, governments, other charities, and statutory agencies to stamp out slavery for good.

www.unseenuk.org

About the Modern Slavery & Exploitation Helpline
08000 121700

- The Modern Slavery & Exploitation Helpline is part of the leading anti-slavery charity Unseen, www.unseenuk.org
- It is confidential and independent, providing information, advice and guidance to potential victims, businesses, statutory agencies such as the NHS and police, and the public about any modern slavery issue.
- The Helpline is staffed by specialists, free to use, can take calls in more than 200 languages, and operates 24/7, 365 days a year.
- People can also contact the Helpline via the website and the Unseen App.
- Since its launch in October 2016 the Helpline has indicated more than 30,000 potential victimsⁱ of modern slavery.
- Data from the Helpline helps to shed light on the nature and scale of slavery in the UK where, experts estimate, there are more than 100,000 in slavery at any one time.ⁱⁱ
- Data is used by other charities, the police, local and national governments and businesses to inform policy and respond directly to reports of slavery and human trafficking.
- The Helpline is independent and funded by grants from trusts, businesses, fellow charities and other organisations, and donations from the general public.

www.modernslaveryhelpline.org

www.unseenuk.org

ENDS

ⁱ Figures from October 2016 to December 2022

ⁱⁱ <https://www.centreforsocialjustice.org.uk/wp-content/uploads/2020/07/It-Still-Happens-Here.pdf>

CALL-IN OF EXECUTIVE DECISION

Parking Fees and Charges

Economic Development, Transport, and Climate
Emergency Scrutiny Commission – 23 April 2025
COUNCIL – TBD

REPORT OF THE MONITORING OFFICER

Useful information

- Ward(s) affected: All
- Report author: Jacob Mann
- Author contact details: Jacob.Mann@leicester.gov.uk
- Report version number: V1

1. Summary

An Executive decision taken by the City Mayor on 25 March 2025 relating to increasing parking charges has been the subject of a 6-member call-in under the procedures at Rule 12 of Part 4D, City Mayor and Executive Procedure Rules, of the Council's Constitution.

The procedure rules state that a scrutiny committee or any five councillors may request formally that the decision be called-in for a further review by giving notice in writing to the Monitoring Officer within five working days of the decision.

The seven Councillors who signed the call in were: Councillor Porter (Mover), Councillor Rae Bhatia (Seconder), Councillor Kitterick, Councillor Kennedy-Lount, Councillor Haq, and Councillor Westley

2. Recommended actions/decision

The Committee is recommended to either:

- a) Note the report without further comment or recommendation. *(If the report is noted the process continues and the call in will be considered at a future meeting of Full Council);* or
- b) Comment on the specific issues raised by the call-in. *(If comments are made the process continues and the comments and call in will be considered at a future meeting of Full Council);* or
- c) Resolve that the call-in be withdrawn *(If the committee wish for there to be no further action on the call-in, then they must actively withdraw it. If withdrawal is agreed the call-in process stops, the call-in will not be considered at a future meeting of Full Council and the original decision takes immediate affect without amendment).*

Council is recommended to either:

- a) Support the City Mayor's decision, and thus confirming the decision with immediate effect; or
- b) Recommend a different decision to the City Mayor. (The original decision will still stand, unless the City Mayor takes a further decision to amend the original.)

3. Scrutiny / stakeholder engagement

The decision was not considered with a scrutiny commission prior to the decision being made.

4. Background and options with supporting evidence

The Executive Decision Report, and Decision Notice are attached at Appendix A and B.

5. Detailed report

The call-in submitted to the Monitoring Officer was in the following terms:

'We, the undersigned, wish to 'Call-In' the decision made by the City Mayor to increase council on street and off street parking charges. Raising parking fees will disproportionately impact people on low-incomes, many of whom are already struggling with rising living costs and increased council tax payments. Since the Labour government took office, financial pressures have increased significantly, with last week's Spring Statement bringing further economic strain with reduced help and support. Increasing parking fees will add yet another burden to those who can least afford it.

Beyond harming residents, these proposed changes will have a wider negative impact on the city centre's economy. The reason for this is clear. Leicester's high parking charges are literally driving business and customers away to Fosse Park, which offers free, convenient and safe parking and is just a few minutes away from the city centre. If the council considered reducing parking fees it could actually see an increase in revenue. Attracting more visitors to Leicester would be good for local businesses and it would help to revitalise the city centre. Yet the council seems intent on doing the opposite, making it increasingly unaffordable to park in Leicester, which will result in further economic decline, with more businesses and customers moving to Fosse Park. We also oppose the proposed removal of the "Night Owl" reduced parking rates, as this would harm the nighttime economy. Instead of deterring evening visitors, the council should be encouraging them. Raising parking fees at this time is a bad decision which will hurt residents, businesses and the city's economy. We respectfully request that the council reconsider the proposals to increase charges and instead starts to adopt policies that will boost investment and encourage economic growth, rather than pricing people out of the city centre.'

The Monitoring Officer has confirmed that the call-in satisfies the requirements of the procedure rules and it has, therefore, proceeded as per the process set out at Rule 12 of Part 4D, City Mayor and Executive Procedure Rules of the Council's Constitution.

Where a call-in has been made, officers are to take no further legally binding action, unless the circumstances of Rule 12 (f) are fulfilled, and the matter shall be referred to a meeting of the full Council. Prior to this it shall be referred to the relevant Scrutiny Committee if one is programmed or a special scrutiny committee if one is convened.

The call-in may however be withdrawn if:

The relevant scrutiny committee/commission makes a resolution to withdraw; or

The sponsor and seconder of the call-in inform the Monitoring Officer that they wish the call-in to be withdrawn.

Following consideration of a call-in by Full Council, the original decision will be deemed to be revived in its entirety. Any agreement by the decision maker to change the original decision will require a further formal Executive Decision.

6. Financial, legal, equalities, climate emergency and other implications

6.1 Financial implications

There are no financial implications arising from the call-in beyond those in the decision report.

Signed: Stuart McAvoy, Head of Finance

Dated : 10 March 2025

6.2 Legal implications

The legal implications arising from the call-in are explained in sections 2 and 5 above

Signed: Kamal Adatia, Monitoring Officer

Dated: 10 March 2025

6.3 Equalities implications

There are no comments in addition to those in the decision report.

Signed: Surinder Singh, Equalities Officer

Dated: 11 March 2025

6.4 Climate Emergency implications

There are no further climate emergency implications to those provided in the decision report.

Signed: Duncan Bell, Change Manager (Climate Emergency)

Dated: 11 March 2025

6.5 Other implications (You will need to have considered other implications in preparing this report. Please indicate which ones apply?)

None

7. Background information and other papers:

None

8. Summary of appendices:

Appendix A Executive Decision Report – Parking Fees and Charges dated 25 March 2025

Appendix B Decision Notice - Parking Fees and Charges dated 25 March 2025

9. Is this a private report (If so, please indicate the reasons and state why it is not in the public interest to be dealt with publicly)?

No

Executive Decision

Parking Fees & Charges

Decision to be taken by: City Mayor

Decision to be taken on: 25 March 2025

Lead director/officer: Andrew L Smith

Useful information

- Ward(s) affected: All
- Report author: Martin Fletcher, City Highways Director
- Author contact details: 37 4965
- Report version number: 1

1. Summary

- 1.1 Leicester City Council applies fees and charges for on and off-street parking. There are varying price points in consideration of running costs, location, usage and facilities available.
- 1.2 The last major change to parking fees and charges occurred in January 2023 following a review of charges in Summer 2022.
- 1.3 Over the last decade, there have been improvements to technology to make payment easier, increases in the cost of delivering services and pressures on transport budgets and developments in transport policy to address the climate emergency. The council has also invested heavily to improve the quality of council car parks.
- 1.4 This report seeks approval to vary parking fees and charges, dependant on parking location and tariff band, as set out in Appendix A of this report, to:
 - Address increases in costs for the management, operation and enforcement of parking facilities.
 - Address revenue budget cost pressures across Highways & Transport, accounting for current and forecast increases in operating costs between Summer 2022 and 2025.
 - Bring council parking tariffs into line with other similar local authorities and private car parking operators.
 - Further support and encourage modal shift toward sustainable transport, recognising increasing bus operator fares and the increase the national capped fare from £2 to £3.
 - Further support and encourage the take up of the Pay by Phone payment method.
 - Delete the Night Owl tariffs to simplify the tariff structure and avoid confusion by customers.
- 1.5 To note that annual increases in parking fees and charges in future years will be considered and implemented thereafter to offset increases in operational running costs.
- 1.6 The measures are required to help ensure expenditure remains within budget and address current and forecast revenue cost pressures.
- 1.7 It is proposed to commence the new tariffs on 12th May 2025, or as soon as practicable thereafter, subject to the necessary actions required to implement the tariff amendments being completed.

2. Recommended actions/decision

- 2.1 To approve revised parking fees and charges, as set out in Appendix A of this report, and to implement annual increases thereafter, as set out in paragraph 4.2.
- 2.2 To note that the Director for Planning, Development & Transportation will implement the revised tariffs in accordance with the statutory requirements, through use of delegated powers to authorise the making of, or changes to, Traffic Regulation Orders.

3. Scrutiny / stakeholder engagement

- 3.1 Leicester City Council utilises a Traffic Regulation Order to manage on-street parking and a similar Off-Street Order for car parks. The council is required to place a notice advertising the new fees and charges.
- 3.2 Where an Order requires amending to facilitate charging for parking, the normal statutory consultation process will be applied.

4. Background and options with supporting evidence

Proposal.

- 4.1 This report proposes to amend on-street and off-street parking charges across all payment methods in May 2025, benchmarked against other similar local authorities and private car parking providers to ensure tariffs remain appropriate and competitive. The proposed tariffs for each car park and the on-street parking zones are detailed in Appendix A. The proposed amendment in parking tariffs is expected to generate an estimated £1m of additional income in 25/26, based on income and levels of usage in 23/24. This will offset the increase in costs since Summer 2022 and deliver revenue savings.
- 4.2 In addition, this report proposes to increase on-street and off-street parking charges annually thereafter to offset increases in operational running costs, benchmarked against the increase in Retail Price Index (RPI), other similar local authorities and private car parking operators and to ensure the tariffs remain competitive.
- 4.3 There is a 10p convenience fee for using Pay by Phone. It is proposed that this is absorbed within the parking tariff to help promote take up of this method of payment.

Rationale for Increase.

- 4.4 Income from parking charges is reinvested into parking, highways and transport-related services to support the delivery of the Council's transport policies and objectives.
- 4.5 On and off-street parking charges were last reviewed in Summer 2022 and following an Executive Decision in November 2022 were increased in January 2023. This was the first increase in parking tariffs since 2014.
- 4.6 During the period since the tariff review in Summer 2022, national inflationary pressures have led to increases in costs such as labour, energy and third-party services (e.g.

security services, CCTV monitoring, maintenance of parking infrastructure). Operational costs associated with management and enforcement have also increased.

4.7 Pay by Phone as an alternative method of payment for parking is now well established locally and nationally. Pay by Phone services involve a small convenience fee (10p) per transaction currently payable by the customer and the capital cost of signage. 57% of transactions are now made by Pay by Phone. The annual value of the convenience fee paid separately by customers is currently £70k. Absorbing the fee within the parking tariff will support and encourage further take up of this payment method, simplifying the charge to customers.

4.8 Demand for parking remains strong, with private operators increasing fees and organisations approaching the council for contract parking.

4.9 Major capital investment in recent years in Leicester City Council car parks, including both Haymarket and Newarke St multi-storey car parks, has significantly improved the car parking environment and the Council's car parks now offer excellent quality and safer car parking for customers. All council car parks have secured Park Mark status which is awarded to parking facilities that have met the requirements of a safer parking risk assessment conducted with the Police.

4.10 Benchmarking data for comparator parking facilities has been reviewed in detail to confirm tariffs remain competitive when compared with similar neighbouring local authorities and private car parking operators.

4.11 Various price points and tariff options have been considered against relevant benchmarking information when developing the proposals.

Risks.

4.12 An Equalities Impact Assessment has been completed. Blue Badge holders remain able to park for free in on-street Pay & Display bays and council car parks.

4.13 Some car owners may choose not to park in the City, or to park in alternative private car parks; however, this is not expected to be significant based upon the experience of other authorities, benchmarking data, and the increase in January 2023.

Provisional Timelines.

4.14 Publish notice of changes to on-street and off-street parking charges on 24th March 2025, or as soon as practicable thereafter.

4.15 Roll out the new tariffs from 12th May 2025, or as soon as practicable thereafter.

4.16 Annual increases for on-street and off-street parking charges commencing 1st April 2026.

5. Financial, legal, equalities, climate emergency and other implications

5.1 Financial Implications

The budget for 2025/26 set a target saving of £4m for Planning, Development & Transportation, to be achieved by 2027/28. The report proposes changes to parking tariffs which are estimated to raise additional income of £1.1m per year by 2027/28. Of this additional income £0.5m will be used to cover existing pressures on the car parking revenue budget; the remaining £0.6m represents savings which will contribute to the £4m savings target. The breakdown, and profile of these saving, is provided in the table below:

	2025/26	2026/27	2027/28	Full Year
Gross Saving	£510k	£550k	£600k	£600k
Minus cost of changes to tariff boards, signage and legal notices	(£10k)			
Net Saving	£500k	£550k	£600k	£600k

Absorbing the 10p convenience fee is estimated at a net cost of £70k. This will be offset by the planned tariff increase and has been taken into account when estimating the additional £1.1m income.

Signed: Stuart McAvoy – Head of Finance

Dated: 6th March 2025

5.2 Legal Implications

Under the Road Traffic Regulation Act 1984, the highway authority has the power to charge a fee for parking in designated on-street and off-street parking spaces subject to a legal Order.

Increases in parking charges introduced by Order can be made either by Amendment Order or, under section 35C or 46A of the 1984 Act (as appropriate), by Notice.

Signed: Zoe Iliffe FCILEx, Principal Lawyer (Property, Highways & Planning Team)

Dated: 11th February 2025

5.3 Equalities Implications

Under the Equality Act 2010, public authorities have a Public Sector Equality Duty (PSED) which means that, in carrying out their functions, they have a statutory duty to pay due regard to the need to eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act, to advance equality of opportunity between people who share a protected characteristic and those who don't and to foster good relations between people who share a protected characteristic and those who don't.

Protected Characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

This report seeks approval to vary parking tariffs and charges dependant on parking location and tariff band and further annual increases thereafter benchmarked against RPI. In order to demonstrate that the consideration of any potential equalities impacts is being taken into account and as an integral part of the process of reviewing or amending existing services, an Equality Impact Assessment (EIA) has been undertaken. It is important to note that increase in parking charges has the potential to negatively impact those on lower incomes.

Blue Badge holders remain able to park for free in on-street P&D bays, council car parks and on some parking restrictions across the city.

Signed: Surinder Singh, Equalities Officer

Dated: 30th January 2025

5.4 Climate Emergency Implications

Car usage is a major source of carbon emissions in Leicester, with the transport sector as a whole accounting for nearly a third of emissions in the city, and a key area to address following the council's declaration of a climate emergency and ambition to reach net zero emissions in the city.

Parking charges can play a role in levels of car usage, and it could therefore be expected that an increase in charges could potentially encourage use of alternative transport options. Any switch to lower carbon alternatives such as walking, cycling and public transport could therefore lead to a reduction in carbon emissions as a result.

Signed: Duncan Bell, Change Manager (Climate Emergency)

Dated: 30th January 2025

5.5 Other Implications (You will need to have considered other implications in preparing this report. Please indicate which ones apply?)

Key risks have been identified with section 4.

6. Background information and other papers:

None.

7. Summary of appendices:

Appendix A – Proposed Tariffs.

8. Is this a private report (If so, please indicate the reasons and state why it is not in the public interest to be dealt with publicly)?

No.

9. Is this a “key decision”? If so, why?

No.

Appendix A – Proposed Parking Tariffs

Haymarket Car Park		
Time Band	Current Tariff	Proposed Tariff
1 hour	£2.00	£2.50
3 hours	£4.00	£5.00
4 hours	£5.00	£6.30
6 hours	£7.00	£8.80
9 hours	£10.00	£12.50
12 hours	£12.00	£15.00

Newarke Street Car Park		
Time Band	Current Tariff	Proposed Tariff
1 hour	£2.00	£2.50
3 hours	£4.00	£5.00
4 hours	£5.00	£6.30
6 hours	£7.00	£8.80
9 hours	£10.00	£12.50
12 hours	£12.00	£15.00

Upper Brown		
Time Band	Current Tariff	Proposed Tariff
1 hour	£2.00	£2.50
3 hours	£4.00	£5.00
4 hours	£5.00	£6.30

Dover Street Car Park		
Time Band	Current Tariff	Proposed Tariff
1 hour	£2.00	£2.50
3 hours	£4.00	£5.00
4 hours	£5.00	£6.30
6 hours	£7.00	£8.80
9 hours	£10.00	£12.50
12 hours	£12.00	£15.00

Abbey Park Car Park		
Time Band	Current Tariff	Proposed Tariff
2 hours	£2.00	£2.20
3 hours	£3.00	£3.30
4 hours	£4.00	£4.40
12 hours	£9.00	£9.90

St Margarets Pastures Car Park		
Time Band	Current Tariff	Proposed Tariff
2 hours	£2.00	£2.20
3 hours	£3.00	£3.30
4 hours	£4.00	£4.40
12 hours	£9.00	£9.90
Sunday/BH Up to 3 Hours	£1.00	£1.10
Sunday/ BH Up to 6 Hours	£3.00	£3.30

Victoria Park Car Park		
Time Band	Current Tariff	Proposed Tariff
1 hour	£1.00	£1.30
2 hours	£2.00	£2.50
3 hours	£3.00	£5.00
4 hours	£4.00	£6.30
9 hours	N/A	£12.50
12 hours	£9.00	£15.00

Watermead Park Car Park		
Time Band	Current Tariff	Proposed Tariff
2 hour	£2.00	£2.20
3 hours	£3.00	£3.30
4 hours	£4.00	£5.40
12 hours	£9.00	£9.90


Phoenix Car Park		
Time Band	Current Tariff	Proposed Tariff
1 hour	£2.00	£2.50
3 hours	£4.00	£5.00
4 hours	£5.00	£6.30
6 hours	£7.00	£8.80
9 hours	£10.00	£12.50
12 hours	£12.00	£15.00

On-Street Pay & Display Bays		
Time Band	Current Tariff	Proposed Tariff
City Centre Inner 1 hour	£2.00	£2.50
City Centre Inner 2 hours	£3.50	£4.40
City Centre Outer 2 hour	£2.00	£2.50
City Centre Outer 3 hours	£2.50	£3.10
City Centre Long Stay 3 hours	£2.00	£2.50
City Centre Long Stay 10.5 hours	£8.00	£10.00
London Rd Outer 1 hour	£1.00	£1.30
London Rd Outer 2 hours	£2.00	£2.50
London Rd Outer 6.5 hours	£7.00	£8.80
London Rd Inner 0.5 hours	£1.00	£1.30
London Rd Inner 1 hour	£2.00	£2.50
London Rd Inner 2 hours	£3.00	£3.80
London Rd Inner 3 hours	£4.00	£5.00

RECORD OF DECISION BY CITY MAYOR OR INDIVIDUAL EXECUTIVE MEMBER

1.	Decision title	Parking Fees & Charges
2.	Declarations of interest	None
3.	Date of decision	25 March 2025
4.	Decision maker	City Mayor
5.	Decision taken	<p>To approve: revised parking fees and charges (Appendix A), absorbing the convenience fee for payment by phone, and to implement annual increases thereafter to offset increases in operational running costs.</p> <p>The Director for Planning, Development & Transportation will implement the revised tariffs in accordance with the statutory requirements, through use of delegated powers to authorise the making of, or changes to, Traffic Regulation Orders.</p>
6.	Reason for decision	To ensure parking fees remain aligned with the council's climate emergency and local transport plan objectives, benchmarking information and budget ceilings, and addressing increased running costs.
7.	A) KEY DECISION Yes/No? b) If yes, was it published 5 clear days in advance? Yes/no	No
8.	Options considered	Various price points for parking fees and charges have been considered alongside benchmarking with other cities and public transport to ensure that proposed tariffs reflect the costs and support the Council's transport policies.
9.	Deadline for call-in <ul style="list-style-type: none"> 5 members of a scrutiny commission or any 5 councillors can ask for the decision to be called-in. Notification of call-in with reasons must be made to the monitoring officer 	1 April 2025

RECORD OF DECISION BY CITY MAYOR OR INDIVIDUAL
EXECUTIVE MEMBER

10.	Signature of decision maker (City Mayor or where delegated by the City Mayor, name of executive member)	
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Inward Investment & Place Marketing

Economic Development, Transport and Climate
Emergency Scrutiny Commission

Date of meeting: 23rd April 2025

Report of the Director of Tourism, Culture, and Investment

Useful information

■ Ward(s) affected: All

■ Report author: Mike Dalzell

■ Author contact details: 0116 454 4551 mike.dalzell@leicester.gov.uk

1. Summary

1. The purpose of this report is to update the Scrutiny Commission on the work of the Place Marketing Team for Leicester and Leicestershire.
2. Leicester and Leicestershire's Economic Growth Strategy for 2021-2030 emphasises the importance of enhancing Leicester's profile as a desirable location to visit, live, work, and do business. This strategy aims to stimulate investment and create a thriving environment for businesses to grow and prosper.
3. The Place Marketing Team (PMT) was established in 2017 and is jointly funded and managed by the City Council and Leicestershire County Council, this team leads on place marketing, inward investment, and strategic tourism across the region.

2. Recommendation(s) to scrutiny:

Economic Development, Transport and Climate Emergency Scrutiny Commission Scrutiny Commission are invited to:

- Review the contents of this report.

3. Detailed report

Background

1. Established in 2017 the PMT promotes the city and county as a place to visit, to live and invest in. Leicester City Council hosts the PMT with the County Council providing funding of £60,000 a year as well as two seconded members of staff. Leicester City Council provides funding of £47,700 a year as well as five full time members of staff.
2. The service works across Leicester and Leicestershire and delivers the following key areas of activity:
 - Strategic Tourism – positioning Leicester and Leicestershire as a cohesive visitor destination, through integrating and delivering in key public and private sector partnerships and contributing to the local economy. A public/private sector, Tourism Advisory Board (now known as the LVEP Advisory Board) is established to shape policy and the delivery of the Leicester and Leicestershire Tourism Growth Plan 2020-2025. In addition, the PMT also work alongside the City Centre Director and Tourism Officer to deliver the aligned objectives from the City Tourism Action Plan 2020-2025.

- Place Marketing – to promote Leicester and Leicestershire as a destination to visit, invest and live. A strategic Place Marketing Coordination group, made up of public and private stakeholders is established to shape place based strategies.
- Inward Investment – Providing an account management service to support businesses (both foreign and domestic) seeking to expand or relocate within Leicester and Leicestershire, as well as developers and investors looking to bring sites and properties to market. The inward investment service also hosts events and promotional activities throughout the year to highlight the potential opportunities available within the city and county.

Strategic Tourism

4. Latest data commissioned in the annual Scarborough Tourism Economic Activity Monitor (STEAM), reports visitor numbers to Leicester and Leicestershire surged in 2023, generating a substantial economic impact. Leicester and Leicestershire welcomed 31.28 million visitors, contributing £2.39 billion to the local economy (£1.547 billion for the County and £844.37 million for the city) This figure surpasses the £2.1 billion target outlined in the current Tourism Growth Plan and represents a 15.5% increase compared to the previous year's £2.07 billion.
5. Across Leicester and Leicestershire visitor numbers rose by 2.46%, with the city welcoming 10.24 million and County attracting 21.04 million visitors. The total number of visitor days increased to 38.53 million, up from 37.65 million in 2022. This growth is attributed to both an increase in visitors and the average length of stay.
6. The data shows growth in the number of tourism-related jobs with more than 22,922 people now employed in the visitor economy sector across the city (8,012 jobs) and the County (14,911 jobs), an increase of 8.96% on 2022.

Local Visitor Economy Partnership (LVEP) Accreditation

7. The Department for Culture, Media, and Sport (DCMS) and Visit England (VE) have introduced a new tiered structure of accredited tourist boards to manage and promote destinations. Leicester and Leicestershire successfully secured accreditation in January 2024, establishing a direct and strategic relationship with Visit England.
8. Accreditation as a LVEP provides the PMT with the opportunity to promote Leicester and Leicestershire nationally with government recognition and to participate in national marketing and travel trade activities. The LVEP offers opportunities for skills development, commissions, and access to grant funding as outlined above. The Partnership includes key stakeholders, including visitor economy businesses and district councils. More detail on the key priorities within the Growth Plan can be found in Appendix B.
9. The strategic tourism work is guided by the LVEP Advisory Board (previously the Tourism Advisory Board - TAB). This includes senior leaders from across the City and County, including businesses such as the National Space Centre, KRIII, Canal and Rivers Trust, Marriott Hotels, Leicestershire County Cricket Club, De

Montfort University, Curve Theatre and Public Sector representation, including Visit England, Leicester City Council, Leicestershire County Council.

10. The LVEP will implement a strategic approach to regional destination management campaigns for Leicester and Leicestershire. Each campaign brings together the offers in Leicester City under overarching themes encouraging visitors to explore the city. Through these joint promotional activities, the campaigns provide a more comprehensive and engaging experience, capitalising on heightened visitor interest, and maximising campaign exposure.

Place Marketing - Strategic Place Marketing Group

11. Established in 2023, the Strategic Place Marketing Group serves as a platform for key stakeholders in Leicester and Leicestershire. Comprising representatives from the three universities, local government, business associations such as the Federation for Small Business, and cultural institutions, the group is dedicated to identifying and implementing strategic place marketing campaigns and group member initiatives that promote the region as a thriving destination.
12. By fostering collaboration and alignment among partners, the Strategic Place Marketing Group amplifies tourism campaigns and projects defined in the Leicester and Leicestershire Tourism Growth Plan 2020-2025. The group's key priorities for 2024 include:
 - Aligning with Visit England's priorities and the focus of Visit Leicester and surrounding districts.
 - Promotion of Leicestershire as a place for students to explore, increasing promotional activities around September and October, capitalising on student enrolment.
 - The creation of a business-to-business newsletter. This platform will enable partners to disseminate their sustainability initiatives and other relevant content, thereby enhancing the region's overall brand visibility and attracting investment.

Destination Management Website

13. Launched in 2017, the current destination management website used for promoting tourism and investment activities, has reached its operational limit. To effectively support the PMT's commercial activities and enhance user experience, a comprehensive website rebuild is imperative. A rigorous procurement process has been completed, outlining detailed specifications for a new platform to replace the current, outdated system and will result in the launch of a new destination management website in May 2025. The new contract represents a significant yearly saving after the initial setup and testing phase.
14. By prioritising a modern, user-friendly website, Visit Leicester will host event, hotel and attraction information for tourism businesses based within Leicester City. The new website aims to further increase its online presence, drive tourism revenue, and better serve both visitors and local businesses. The new website will also meet rigorous accessibility standards, meaning that it is usable and navigable by those with accessibility requirements.

Commercial Strategy

15. Increasing commercial income provides a significant opportunity for the Place Marketing Team to achieve long-term financial sustainability. This marks a shift towards a more commercial approach by generating income from both public and private sector partnerships. Since Q1 of 2024, the Place Marketing Team have established the following commercial income streams to support the sustainability of the service:
 - Direct Hotel Booking: Utilising platforms such as Booking.com and Expedia, Visit Leicester can secure commission revenues without incurring additional costs for accommodation providers.
 - High-Value Partnerships: The PMT has pivoted towards developing bespoke commercial packages. This targeted approach offers businesses the opportunity to access Visit Leicester's extensive marketing expertise, maximising their reach and driving ticket sales. This strategy has yielded significant success, particularly for attractions across the county.
 - The PMT successfully secured £13,500 of funding to refresh the image library of Leicester and Leicestershire aligning with Visit Britain/England's strategic communications. This initiative, commissioned by the PMT, has captured high-quality imagery of attractions and venues across the region, and at key City Centre venues such as the National Space Centre and the King Richard III Visitor Centre.
16. Whilst in its first year of commercial activities, it is forecast that the PMT will generate circa £48,000 of commercial income by the end of the financial year. The income is intended to be used to reduce the budget pressures on Leicester City Council. By analysing booking trends and partner engagement, the PMT will continue to refine its commercial strategy. The new destination management website, due to complete by May 2025 will enable continued revenue growth. This strategic shift towards a more commercial Place Marketing Team helps to position the service for long-term sustainability.

Group Travel

17. Attracting coach and group travel bookings to the city has been a significant priority for the PMT in 2024 and is yielding the following, tangible results.
18. A booking from Probus Harpenden in October 2024, comprising 45 delegates, contributed £8,717.50 to a local business. The booking was taken whilst attending the Group Leisure Travel Show. The stand was organised by the PMT with partner businesses contributing to the costs.
 - The Association of Group Travel Organisers (AGTO) have agreed to host their annual showcase event in the region in February 2026 and have confirmed accommodation at the Holiday Inn, Leicester. This prestigious event, valued at over £30,000 in accommodation and room hire costs, provides a unique opportunity for local attractions to connect directly with group travel bookers.

- At the Group Leisure and Travel Show in Milton Keynes, the PMT collaborated with seven partners to share exhibition costs and maximise Leicestershire's presence. This strategic approach resulted in engaging with over 130 group travel organisers, generating bookings for partners such as King Richard III visitor centre and the Great Central Railway and Belvoir Castle. This partnership approach generated a net profit, rather than incurring a cost to attend the show.
- The PMT's quarterly newsletter, distributed to a database of over 600 group travel organisers amongst others, continues to be a valuable tool for promoting group-friendly attractions. With an impressive 30% subscribers regularly reading the newsletter, it is an effective communication method, reaching a group travel target audience.
- Recognition of the PMT's commitment to the group travel market was further solidified by being shortlisted as a finalist for the Group Leisure and Travel Awards - Best UK Destination for Groups category, for a third consecutive year.

Campaigns – Uncover the Story/Fitcation/Taste the Place

19. The PMT's email newsletter audience continues to expand and now reaches 12,000 subscribers. This valuable platform serves as a direct channel to engage with individuals interested in exploring the region's attractions and accommodation providers.
20. A key focus has been on promoting the Uncover the Story, a campaign aimed at showcasing attractions, hidden gems and telling the story about Leicestershire's history. The campaign attracted over 170,000 views to the Uncover the Story web pages in the last year.
21. The Fitcation campaign aims to encourage visitors to explore the City's green spaces, active leisure venues and waterways through experiences such as cycling, walking, and sporting activities. The campaign was strategically featured during the spring and summer seasons, generated over 28,000 views.
22. Taste the Place, a central focus of PMT's efforts, resulted in the creation and promotion of a suite of five videos, which were integral in promoting the campaign across social media. The campaign webpages have attracted over 257,000 views during the past year, with key pages such as "13 Places to Enjoy Afternoon Tea" reaching a wide audience of over 24,000 viewers.

City Event Promotion

Key Event Promotion Highlights:

- **St George's Festival in Old Town:** A change in location, driven by our promotion, resulted in increased footfall in Leicester's Old Town.
- **Riverside Festival:** Active participation at the Visit Leicester stall promoted return visits and showcased city walks, trails, and attractions. The event page secured 35,644 views.

- **Kasabian Summer Solstice Gig (Victoria Park):** Our promotion generated the year's most popular blog post, with 11,136 views.
- **Leicester Food Festival:** Collaboration with About Leicester led to the successful launch of the inaugural Leicester Food Festival at Abbey Park, attracting thousands to sample local cuisine, and featuring the "Taste the Place" branding. The event page received 20,430 views.
- **Diwali Events:** Comprehensive support for Diwali events included fulfilling a request from 10 Downing Street for footage of community preparations. Pages received 80,906 views.
- **Abbey Park Bonfire and Firework Display:** Promotion included a paid social marketing campaign, resulting in 63,055 event page views and 8,116 blog views.
- **Christmas in Leicester:** Support included paid commercial work for Leicester Cathedral, Enlightened Leicester (16,087 views), the Christmas Market (27,868 views), and Ice Skate Leicester (73,737 views). The Christmas in Leicester marketing campaign and ongoing support for city centre visitation were key. The Ice Skate Leicester paid campaign saw a 245% increase in page views and 42,477 ticket page referrals compared to 2023.
- **Comedy Festival:** Promotion included blog writing, national PR activity, and city-wide awareness campaigns. Partnership with DataThistle and Big Difference ensured all 2025 comedy festival events were listed. Results included a 6% increase in ticket sales, a 20% increase in ticket value, and an estimated £6 million economic impact (figures from Big Difference Company).
- **Light Up Leicester:** Collaboration with BID Leicester and FU Media focused on idea generation and promotion to drive footfall and support food and drink businesses through the "Taste the Place" campaign.
- **City Centre Event Popularity:** Five of the top 10 most viewed pages on Visit Leicester over the past year were dedicated to City Centre events: Ice Skate Leicester, Abbey Park Bonfire, Diwali, Riverside Festival, and the Christmas Market.

Cultural Quarter Guide

- Work to create a Leicester Cultural Quarter destination guide was completed. This 20-page guide features creative businesses, venues and food and drink retailers. 5,000 copies have been printed and are being distributed around the city. Printing costs were covered by £1,500 of income secured through advertising. Complementary webpages have been created on the Visit Leicester website to ensure online representation of this key city area.

Sustainable Tourism

23. Supporting net zero ambitions, and in alignment with Visit England's core priorities, and the LVEP Growth Plan, focussed work in this area recognises the associated challenge of balancing increased visitor numbers with a reduced carbon footprint.

Leicester City businesses are supporting this campaign, working with Visit Leicester on Case Studies, highlighting best practice in the local visitor economy. Leicester Museum and Art Gallery was chosen as a Visit England case study for their community engagement work to produce locally focussed exhibitions. Businesses are also being supported with dedicated business support, encouraging them to apply for green accreditation and helping them implement sustainable practices. This also links to the Fitcation campaign expanding its product reach by promoting green transport, walking, and cycling routes throughout the city. Visit Leicester has launched a digital-first initiative, Green Days, Green Stays, Green Ways to promote Leicestershire's tourism businesses actively working towards sustainable goals. As part of this initiative, City Centre sites such as King Richard III and Leicester Museum & Art Gallery alongside green travel initiatives will be highlighted as implementing sustainable best practice through case studies and social media features.

24. This campaign adopts a dual-pronged approach, targeting both businesses and consumers. By sharing inspiring stories and raising awareness, the PMT aims to encourage more City businesses to achieve green tourism accreditation and join the wider movement. Participating businesses also benefit from the potential for promotion by Visit England.
25. Through this strategic initiative, the PMT is actively contributing to a more sustainable and regenerative tourism landscape while promoting the region's green credentials.

New Destination Management Plan 2025

26. The Tourism Growth Plan 2020-2025 set out ambitions for tourism across Leicester and Leicestershire positioning the region as a leading destination for leisure and business tourism. It has provided a framework for the City and County's efforts to attract an increasing number of leisure and business visitors to the area, whilst encouraging those visitors to stay longer and spend more. Work on a new Destination Management Plan for 2026-2031 has begun and is due to conclude in November 2025, ready to launch in January 2026. This will establish the new strategic direction, aligning with Visit England's priorities as set out in the forthcoming Visit England strategy, and collaborating closely with stakeholder groups to help shape its development and ensure relevance to the sector.

Inward Investment Reporting

27. The PMT has expanded its key performance indicators (KPIs) to provide a more comprehensive assessment of its economic impact on Leicester.
28. The table below highlights the economic impact on Leicester derived from projects directly supported by the PMT through account management. Further details on the account management support offered for each success can be found in Appendix A.

Key Performance Indicator	Reporting Period: 1st January 2024 – 31st December 2024
No. of Enquiries Converted into Investment Decisions	6

Capital Investment	£1.1m
Business Rates Generated per annum	£292k
Total Salary Value per annum	£9.8m
Total Investment Value*	£11.2m
New Jobs Created	183
Safeguarded Jobs	205
Average Salary of New Jobs Created	£35,302

*Total Investment Value = Capital Investment + Business Rates + Total Salary Value

NB the financial information provided is commercially confidential and has therefore been aggregated and rounded.

Department for Business and Trade (DBT) Reporting

29. The PMT serves as a point of contact between Leicester City Council and the DBT. This role involves providing the DBT with local knowledge and connections to the region's business support services and Leicester City council. This facilitates the DBT in successfully 'landing' their account-managed projects.
30. The table below highlights the economic impact to Leicester relating to projects where the PMT and local partners have supported the DBT to secure inward investment. Further details on the DBT account management support offered for each success can be found in Appendix A.

Key Performance Indicator	Reporting Period: 1 st January 2024 – 31 st December 2024
No. of Enquiries Converted into Investment Decisions	3
Capital Investment	£6.4m
Business Rates Generated	£83k
Total Salary Value	£1,02m
Total Investment Value*	£7.34m
New Jobs Created	35
Safeguarded Jobs	0
Average Salary (New / Safeguarded Jobs)	£29,425

*Total Investment Value = Capital Investment + Business Rates + Total Salary Value

NB the financial information provided is commercially confidential and has therefore been aggregated and rounded.

Attracting Businesses to City Council Managed Workspace

To support the wider activities of Leicester City Council's Corporate Estate to generate tenants for the council, the Invest in Leicester team proactively engaged with colleagues to add value by strengthening marketing and promotion to help identify end users.

Promotional activities for CANOPY, Dock, and Blackbird Industrial Park to highlight the availability of immediate space has helped to gain traction for the council which means the premises have either been pre-let or leased out to prospective tenants.

Similarly, joint promotion with Leicester Museum and Art Gallery (LMAG) and the Estates and Building Services team seeking interest for a café operator following interest from soft marketing have brought bids which would have otherwise not come forward.

Aiding Sale of Council Assets

Following Invest in Leicester roundtables held last year jointly with the private sector, this generated acquisition interest in the council's disposal programme which led to several marketing opportunities for sites and premises including Ashton Green (employment and housing options), Sovereign House 16 New Walk and Phoenix House. LinkedIn posts at the time provided a valuable insight from the market into the appetite from developers keen to engage with the council and will serve the basis for any asset sale in the future.

Growing Rented Housing Stock

It has been widely reported that Leicester faces a substantial housing demand, with a target of 39,000 new homes by 2037. To fulfil this critical need and meet its obligations, the city must consistently deliver 800 new affordable homes annually.

This significant demand is driven by a growing population and the urgent need to address homelessness, which affects 5,000 individuals and families each year. Therefore, the council has been exploring opportunities to partner with agents and landlords to address the temporary housing needs. Proactive promotion at property events and on LinkedIn with Housing colleagues (facilitated by HomeCome Ltd) to individuals and organisations interested in renting properties to house residents using council funds has attracted numerous enquiries to the inward investment team resulting in contracts agreed for periods of between 2 – 5 years.

Partnership and Collaboration

31. The PMT has developed a collaborative network dedicated to attracting and supporting strategic investment, highlighting local opportunities, and presenting a unified, professional front for investment in Leicestershire. Key partnerships include:
 - Team Leicester: The PMT collaborate closely with Team Leicester to jointly host events at the MIPIM, UK Real Estate Investment and Infrastructure Forum (UKREiIF) and hold networking sessions for the property industry to promote the city. Team Leicester is funded through its sponsorship base, whereby businesses pay a small sponsorship fee of £1,950 per annum with 100% of the funds reinvested into promotional events and activities. Sponsoring businesses can then attend events and network with attendees.
 - Midlands Engine: The PMT is a member of the Midlands Trade & Investment Advisory Forum, ensuring that Leicester is represented and involved in the development of international trade and investment activities undertaken by the Midlands Engine. The Forum enables members to discuss issues, shape and suggest initiatives, and identify areas for collaboration.
32. For further details on these partnerships and specific examples of collaborative work, can be found in Appendix A.

Investor Events Programme

33. The PMT has developed a comprehensive events programme designed to bridge the gap between the public and private sectors. This has been part-funded by private sponsorship.

34. Highlights from the 2024 events programme include:

UKREiiF: The Leicester and Leicestershire delegation included representatives from Leicester City Council, Leicestershire County Council, and University Hospital Leicester NHS Trust. The PMT coordinated a series of three interconnecting events for UKREiiF:

- A launch event prior to UKREiiF for 85 delegates to equip our ambassadors with positive messages and provide them with details of local development opportunities to highlight. Leicester City Council presented their growth, and regeneration plans for the city. The event was fully funded through private sponsorship.
- A showcase session highlighted sustainable development in Leicester and Leicestershire, and that the area is 'open for business.' 100 delegates attended. The event was funded 50% through private sponsorship and 50% by Leicester City and Leicestershire County Council.
- A networking event, hosted by Team Leicester, connected 90 property and construction sector directors with senior council officers from Leicester City, Leicestershire, Blaby, Melton, and Northwest Leicestershire. Team Leicester sponsors fully funded the event.

35. Leicester and Leicestershire Property & Construction Lunches: In collaboration with private partners, the PMT established bi-annual networking and awareness raising lunches for the region's property and construction sector, held across Leicester and Leicestershire. These events offer an excellent opportunity to spotlight local authority projects, enabling stakeholders, including landowners, developers, commercial agents, and architects, to connect, resulting in improved awareness of local priorities and initiatives and engaging with key decision makers to support bringing sites and properties forwards. In March 2024, Leicester City Council Senior officers presented to 130 delegates about their development and regeneration opportunities within the city.

36. These events offer excellent return on investment for Leicester City Council, as they are organised and managed by a private operator, who charge a commercial delegate rate with the PMT devising the agenda and influencing the attendee list.

37. Feedback highlights that the events outlined above are highly valued by the property industry and Leicester City and Leicestershire's county council. These events serve as valuable platforms for highlighting projects underway across the region, enabling senior leaders from City councils to discuss their regeneration objectives and masterplans with the property industry. The PMT successfully leveraged £43,350 in private sector funding for these events in 2024.

38. Further details of the events can be found in Appendix A.

DBT Funded Key Account Management Programme

39. In 2024, the PMT successfully secured funding from the DBT to establish a Key Account Management (KAM) Programme for the region. This initiative is designed to provide dedicated account management support to existing foreign-owned businesses and is a strategic priority for the DBT.
40. To date, the KAM programme has identified 41 foreign owned businesses within the City, account managing a total of 3 verified wins, creating a total of 35 jobs, and a financial investment totalling £7.34 million.
41. The KAM programme will continue until 31 March 2025, with funding in place to support its operations. The PMT provides monthly progress reports to the DBT, detailing all company interactions, new projects, investment wins, and job creation.

4. Financial, legal, equalities, climate emergency and other implications

4.1 Financial Implications

There are no direct financial implications arising from this report.

Signed: Stuart McAvoy – Head of Finance

Dated: 26th March 2025

4.2 Legal Implications

The Partnership and funding arrangements agreed between Leicester City Council and Leicester County Council including the secondment of staff from the County Council must follow and comply with any Memorandum of Understanding governing the ongoing relationship and any performance, monitoring objectives and outcome requirements to promote and enhance the viability and success of the various work programmes. In relation to any purchase or procurement of goods, services or external consultancy services including expenditure on ICT and computer related requirements this will generally need to be on a competitive and value for money basis taking into consideration social value issues and fully in accordance with the Council's internal Contract Procedure Rules.

Signed: Steven Lowry-Smith - Contracts & Procurement Solicitor (Commercial) Ext. 37 1395

Dated: 13th March 2025

4.3 Equalities Implications

There are no direct equality implications arising from this report, however with regards to any engagement, promotion, or marketing campaigns, we need to ensure these are accessible for all groups and communities, including those with access needs, for example BSL, visual impairments.

Signed: Sukhi Biring, Equalities Officer

Dated: 13th March 2025

4.4 Climate Emergency Implications

Leicester's economy, like all other areas of life in the city, will need to transition to a net zero economy – and one in which businesses are as resilient as they can be to the changing climate. All of this will involve challenges for businesses, but it also brings opportunities, both for individual businesses and for Leicester as a city. The areas of activity covered in this report can all play a role in helping Leicester grasp those opportunities. For example, in Strategic Tourism, businesses can be encouraged to adopt sustainable practices and encouraged to use these in their marketing. Under Place Marketing, Leicester's advantages as a destination with relatively good public transport and cycling links can be promoted. And under Inward Investment, the City's initiative-taking approach to adopting the low carbon technologies and best practices can help position the city as modern, forward thinking and open to investment in sustainable new development. Actions already included in the council's Climate Ready Leicester Plan, and referred to in paras 23-25 of this report, are the Green Accreditation Scheme for tourism businesses (action 3.15, p49 of the Climate Ready Leicester Plan) and showcasing green businesses as part of the Destination Management Campaign (action 3.16, p50). The Plan is updated annually, so there will be opportunities for further actions to be added in future.

Signed: Duncan Bell Change Manager (Climate Emergency). Ext. 37 2249.

Dated: 7 March 2025

4.5 Other Implications

Signed:

Dated:

5. Background information and other papers:

None

6. Summary of appendices:

Appendix 1 - Recent Achievements and Current Activities: Inward Investment

Appendix 2 - Recent Achievements and Current Activities: Place Marketing and Strategic Tourism

Recent Achievements and Current Activities: Inward Investment

Inward Investment Achievements - Leicester

The Place Marketing Team, account managed Investment projects:

Company Name: UKBC

UK Business College (UKBC) according to their website is a forward-looking institution dedicated to providing accessible education that empowers students to shape their futures with confidence and purpose.

Students at UKBC benefit from flexible study options designed to fit alongside other commitments, highly experienced teaching staff with industry expertise, personalised support and guidance, and a learning environment where staff and students form a collaborative academic community.

Invest team have been supporting the business following the set-up of their sister company Fairfield School of Business (FSB) reported last year including introductions to the Leicester Employment Hub and the Graduate Retention programme. In total 68 new jobs to be created.

- Facilitating introductions to support the company's recruitment of Lecturers and back-office staff through the Leicester Employment Hub job vacancies portal and via the Graduate Retention Programme.
- Conducted various property searches of both vacant council commercial premises and through local agents to identify expansion sites in the city. Follow up meetings to discuss individual buildings and their suitability for education use.

Company Name: RG+P

RG+P is a multi-disciplinary design business considered relocating their HQ out of Leicester. Following various discussions, property searches and site visits, RG+P opted to remain in the city with a temporary move to Sovereign House, Princess Rd West which will lead to their eventual permanent base at CANOPY once completed in the summer 2025. This project safeguards 70 jobs and supports to create a further 36 jobs in Leicester.

- Conducted various property searches of both vacant council commercial premises and through local agents to identify new offices in the city.
- Assisted viewings for interim premises and facilitated discussions around the internal mechanical and electrical services arrangements for CANOPY.
- Facilitated negotiations with Estates and Building Services colleagues to agree a temporary License and Heads of Terms for the occupation of CANOPY.

Company Name: Ministry of Justice (HM Courts & Tribunals Services)

Ministry of Justice (HM Courts & Tribunals Services) is responsible for the administration of criminal, civil and family Courts and Tribunals in England and Wales. The project involved finding suitable offices, relocating staff from existing locations in Arnhem House, Leicester and Pinfold Gate, Loughborough into one location at Sovereign House. This office will play a critical role providing administrative support to Court users, Judiciary and Management - most of the roles will be customer facing/admin roles.

- The Invest team provided property lists of LCC owned premises to MoJ, followed by site visits to inspect available office space with internal colleagues. Following a period of negotiation with the MoJ, a Licence was granted to occupy the 3rd floor of Sovereign House. Total jobs for this location are 46 safeguarded and approx. 20 jobs into the city from Loughborough.

Company Name: World Products Ltd

World Products Ltd, a rapidly growing Amazon reseller exclusively for Healthcare, Beauty and Pharmaceutical brands based in Birstall. Following an introduction by the DBT International Trade Advisor for the East Midlands, a meeting was held to understand the nature of their expansion requirements and the locations World Products Ltd were considering at the time. Several searches and property viewings were organised and an introduction to the DOCK property team facilitated. The company made the decision to retain their warehousing facility in Birstall however, their technology team would benefit from being in an innovative environment thereby occupying space in DOCK3.

- Undertaking property searches, introductions and facilitated meetings with the property team at DOCK, leading to the decision to agree heads of terms to occupy office space at DOCK3 potentially creating 6 new jobs.

Company Name: Employee Zero

Employee Zero offers a host of leading cloud software and services to clients from their partners including the likes of Microsoft and Google. They support dozens of organisations with their Office 365 and Google G Suite deployments, which often form the core of their IT services. Employee Zero have been at Dock since 2014 and were considering moving to alternative premise outside of this location.

- Following property searches and discussions with the property team at DOCK, they decided to remain in the same location and occupy larger premises at DOCK3 safeguarding employment and to help with any future increase in headcount.

Company Name: Array Marketing

Array Marketing are a provider of retail merchandising displays and store fixtures to the global prestige cosmetics industry. They provide custom, high-end merchandising solutions in more than 30,000 retail locations for the world's most iconic prestige brands and retailers. With a strong footprint in cosmetics and apparel, the company utilises its deep expertise in design, innovation, project management and global manufacturing to help transform retail environments for its clients.

Array contacted the Invest team looking for around 20,000 Sq. Ft of office space for their Leicester office and to allow for further expansion. Currently based at Friars Mill, Array were keen to remain in the city and give staff a high quality environment to work in.

- Initially, Array explored options at CANOPY and other locations in the city however, following various property searches undertaken the team including premises outside the city boundary, site visits were organised and negotiations facilitated with the DOCK team. Heads of Terms to occupy the whole of DOCK4 were agreed, safeguarding 81 jobs and allow growth for a further 50 new jobs to the city.

The Department for Business and Trade (DBT) supported projects:

Company Name: Malabar Gold & Diamonds

Malabar Gold and Diamonds is an Indian jewellery group headquartered in Kerala. The company was founded in 1993 and owns more than 330 showrooms spread across 13 countries, making it one of the largest chains of jewellery retailers in the world.

The Invest team were introduced by DBT to support the planning, recruitment and opening of their new flagship Leicester store on Belgrave Rd and the opportunity to announce their presence in the city linking the company to the local business community of Leicester and other sponsorship opportunities. This is their first store outside of London and sets the standard of their other outlets in the UK. 20 new jobs were created.

- DBT provided the company with visa entry queries, connection to the Local Authority in Leicester regarding planning permission and ongoing support for their wider UK expansion with additional property searches for Southall, Birmingham and Glasgow.

Company Name: Superhouse

Superhouse an Indian owned textiles and clothes manufacturing company based in Thurmaston, were Leicester introduced by DBT to the Invest team for assistance with their current location. The company have been looking to expand into a new site in the city however, following various searches carried out for the company they decided to invest in their existing site to increase the capacity and efficiency of the building. As a result, the company have now invested £60,000 in new racking and forklift operations and expect to invest the same amount next year, making a total of £120,000 capital investment into the site, which has resulted in 3 new jobs created in the upgraded Leicester facility.

- Connections into wider business support network across the region involving digital branding support to build an e-commerce strategy, recruiting merchandisers with experience to oversee planning, logistics and shipments, and export trading.
- To assist with their initial recruitment drive, the Invest team facilitated introductions to Leicester Employment Hub colleagues and the local universities intern schemes.

Company Name: Teatime Group

Restaurant chain TeaTime, headquartered in Qatar with branches across the Gulf region (110 outlets in total), opened its first UK branch in Leicester. In line with its operations in Qatar, the restaurant will also serve a selection of food, juices and smoothies, sandwiches, desserts, etc. The company went about this set up on their own although, have a UK based partner. Based on their market study, the company eventually aims to open 10 - 12 branches across the UK over the coming 3 - 5 years.

- DBT initially supported Teatime with their visa applications for their managerial staff and Head Chef who were required to travel to the UK to support the planned opening of their Leicester restaurant. Also, during the fit-out stage contacted the Invest team to provide guidance to assist with business rates queries, the relocation of street landscaping and for their licence application for outside furniture.
- On-going support is currently being provided by DBT for their new premises in the north of England and by the Invest team for additional storage space requirements.

Partnership and Collaboration

The Place Marketing Team has established a collaborative network with Leicestershire's district and borough councils, City Council departments, and external partners to attract and support investment and information sharing. This includes:

- **Department for Business and Trade (DBT):** The PMT regularly engages with the DBT to attract foreign investment to Leicestershire. For example, by promoting our growth sectors and regional strengths to the DBT network, supplying information on strategic sites, hosting delegation and familiarisation visits, facilitating investment projects, providing local aftercare services, and feeding back local business intelligence.
- **Team Leicester:** The PMT works closely with Team Leicester each year to jointly host events at MIPIM, UKREiIF, and hold networking sessions throughout the year for the property industry. The Team Leicester model, which covers Leicester and Leicestershire, is funded through its sponsorship base, whereby businesses support the vision of promoting all that is great and good about the city and county. Partners pay a small sponsorship fee for the year, and 100% of the funds are reinvested into events and activities that will promote the area. Sponsoring businesses then get the opportunity to attend the scheduled events and network with the attendees.
- **Midlands Engine:** The PMT is a member of the Midlands Trade & Investment Advisory Forum, ensuring that Leicestershire is represented and involved in the development of international trade and investment activities undertaken by the Midlands Engine. The Forum enables members to discuss issues, shape and suggest initiatives, and identify areas for collaboration. The team is planning to host an event at UKREiIF 2025 inside the Midlands Engine Pavilion, showcasing successful Enterprise Zones, emphasising how public-private partnerships have fostered growth-driven industries and cutting-edge R&D.
- **Wider Networks:** Regular engagement with national government departments, business support agencies, academic institutions, and industry experts ensures the team provides comprehensive "soft landing" information to current and future investors.

This approach has enabled Leicestershire to effectively support strategic investments, highlight opportunities, and demonstrate a professional, coordinated approach to inward investment.

Investment Promotional Events

UK's Real Estate Investment & Infrastructure Forum (UKREiIF) Industry Conference

The UKREiIF conference, held in May 2024 in Leeds, is widely recognised as a key event to connect people, places, and businesses to accelerate and unlock sustainable, inclusive, and transformational investment.

The team worked with partners to host three interconnecting events. A launch event was held in April 2024 for 85 delegates that prepped our ambassadors with positive messages about the opportunities we have across the city and county. The event cost £3,000 and was fully funded by private sector sponsorship.

At UKREiIF the team hosted a sell-out place showcase session for 100 delegates working with the private sector to highlight how we are designing sustainable spaces in Leicester that ignite creativity, fuel productivity, and foster vibrant communities.

The team also partnered with Team Leicester to hold an evening networking event for 90 senior executives from key private sector companies and senior officers from our local authorities (Leicester, Leicestershire, Blaby, Melton and North West Leicestershire), which cost £6,300 and was fully funded by Team Leicester.

The team is planning to host an event at UKREiF 2025 explore the critical foundations for igniting growth for businesses in the region. Featuring organisations that have successfully invested in Leicester and Leicestershire, panellists will share their valuable insights and experiences, highlighting the compelling investment opportunities that the region presents and discussing the key factors that contribute to a thriving business ecosystem in the city and county.

Leicester and Leicestershire Property and Construction Lunches

In collaboration with private partners, the PMT established bi-annual lunches for the region's property and construction sector, held across Leicester and Leicestershire. These events offer an excellent opportunity to spotlight local authority projects, enabling stakeholders, including landowners, developers, commercial agents, and architects, to engage with each other and our local authorities.

In March 2024, the City Mayor and the Director of Planning and Regeneration presented to 130 delegates about their development and regeneration opportunities resulting in a greater awareness of local priorities and initiatives, whilst establishing connections with key decision makers to support with bringing sites and properties forwards.

Future events include a 'universities as drivers of investment', featuring University of Leicester, De Montfort University, and Loughborough University.

These events offer excellent value for money for the City Council, as they are organised and managed by a private operator, who charge a commercial delegate rate of £95, with the PMT devising the agenda and influencing the attendee list.

Business Insider East & West Midlands Property Awards

Invest in Leicester sponsored and hosted a table of private sector developers, commercial agents, and landlords at the Awards in September 2024. The event is a fantastic celebration of the region's abundance of enterprise, skill, and innovation within the property sector and provided an excellent platform to highlight the service. The team presented the award for "Regeneration and Restoration Project of the Year." To highlight the projects in the city and county, Invest in Leicester also sponsored the West Midlands Property Awards dinner in November 2023, presenting the "Regeneration Project of the Year", due to high calibre professionals that attend and an opportunity to continue the connections already established in the region.

Private Sector Roundtables

Leicester City Council and Leicestershire County Council have been meeting with private sector businesses in a series of collaborative 'roundtable' events. The roundtables spotlight specific topics impacting growth and investment within Leicester and Leicestershire, discussing how the public and private sector can work collaboratively to deliver positive outcomes for the city and county. Discussions have focussed on:

- How the public and private sector work together to market Leicester and Leicestershire,
- The planning process and working together to build on successes and overcoming challenges,
- How public sector assets can enable growth,

- How to deliver housing growth,
- How collaboration with the skills system can enable growth.

Recent Achievements and Current Activities: Place Marketing and Strategic Tourism

Tourism Campaigns

Uncover the Story

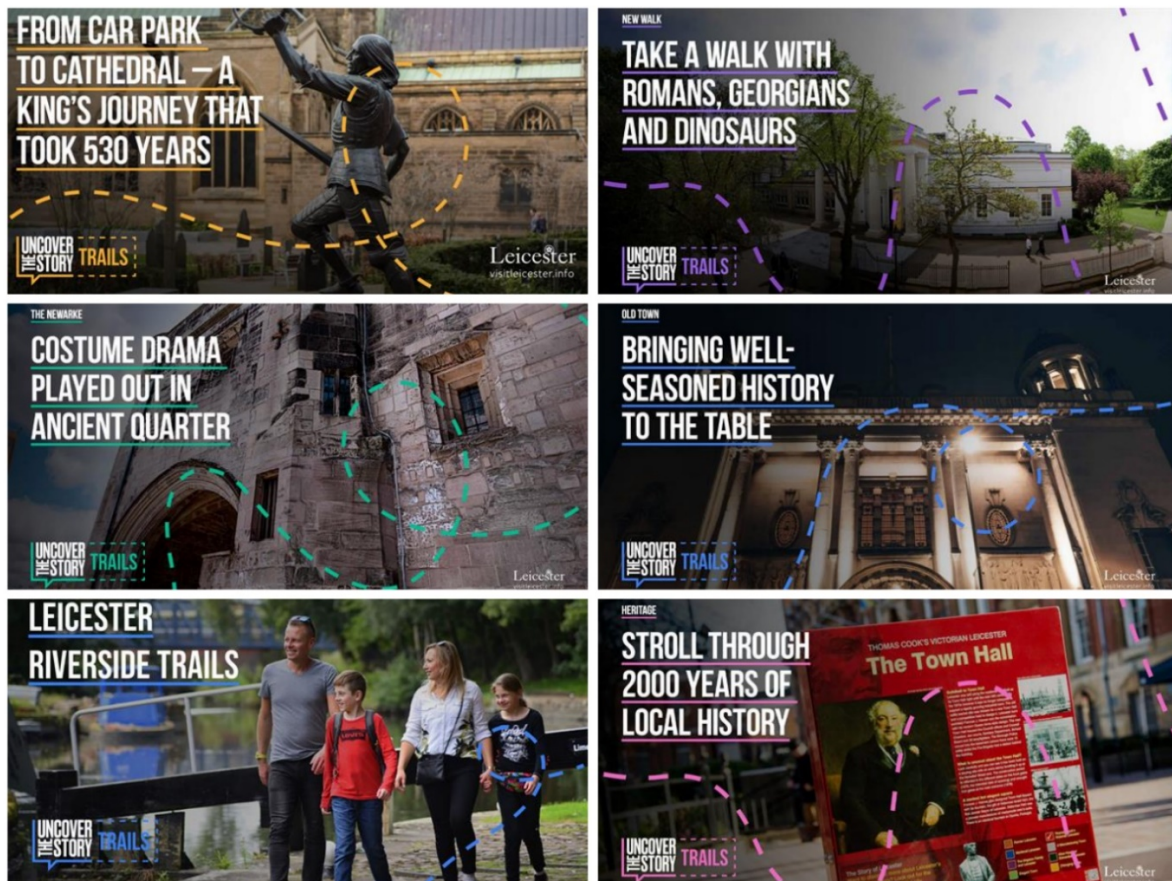
The Uncover the Story tourism marketing campaign remains an important way to create a strong, distinctive identity for Leicester and Leicestershire as a visitor destination and bring cohesion to the visitor offer.

Uncover The Story continues to be a key part of the city marketing strategy, and posts highlighting the campaign have been shared widely and regularly on social media and regularly within the fortnightly newsletter.

The Cultural Quarter Guide and Leicester Leading strategy took on the look and feel for Uncover The Story, making the brand identity for city marketing dovetail with the Uncover The Story campaign, further highlighting Visit Leicester campaigns are becoming integrated into the wider city marketing activity. World Tourism Day in September focused on resharing our major campaign videos and highlighting the Uncover The Story campaign.

Themed trails promote over 70 different local attractions, including hospitality businesses. Find out more at www.visitleicester.info/ideas-and-inspiration/trails. The trails were designed to encourage exploration of the wider area, celebrate lesser-known attractions, and increase visitor dwell time in the city. Themes include:

- KRILL Trail
- New Walk Trail
- Newarke Trail
- Old Town Restaurants Trail
- Riverside Trails
- Heritage Trail



Taste the Place

The campaign launched in March 2023 to promote the area's food and drink reputation by highlighting food and drink to consume, buy, see in production, and experience through events and activities. The campaign is divided into four themes:

- **A Taste of England:** Explores traditional food and drink from the county, including pies, cheese, ales, and ciders, as well as pubs and venues for afternoon tea.
- **Food for Thought:** Explores fighting climate change from the kitchen by looking at environmentally sustainable food consumption that reduces food miles and promotes a farm-to-fork approach.
- **The Home of Veganism:** Looks at the origins of veganism in Leicester and the founding of the Vegan Society in the city.
- **The World on a Plate:** Explores Leicester and Leicestershire's world food offer and the communities that make it.

As the Taste the Place campaign entered its second year, the place marketing team were able to work to expand the partnerships with local businesses, food influencers and chefs.

A partnership with About Leicester/About Festivals and Humongous Hospitality led to the first ever Leicester Food Festival, a major summer event held in Abbey Park on 10-11 August 2024, which attracted thousands of people over two days and will be returning in 2025. The Visit Leicester team were key partners in the planning and organisation of the event and Taste the Place banners, bunting and imagery were displayed prominently on the site and in the marketing.

Visit Leicester also supported the campaign by Pukaar Media to bring the title of England's Curry Capital back to Leicester. Support came with the campaign being run under the banner of Taste

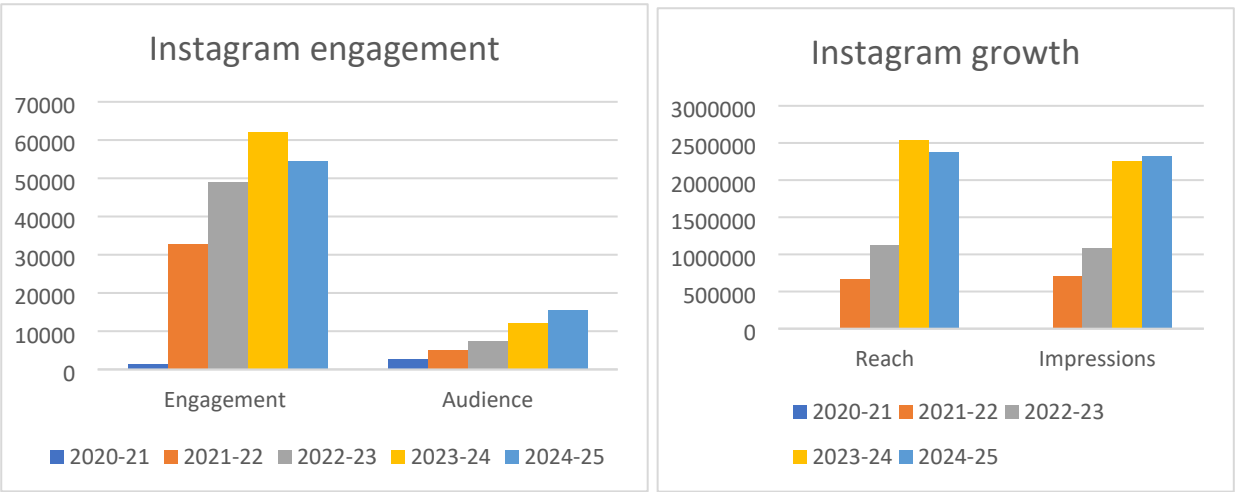
the Place and World on a Plate, with online voting supported alongside PR and online promotion. The team spoke at the announcement of the winner and were presented with the official Curry Capital certificate.

This partnership with Pukaar extended to the Leicestershire Curry Awards in September, with Taste the Place and England Curry Capital being centre stage, and through into the launch of National Thali Week in January, with coverage online and in the media, including a feature on New Delhi TV.

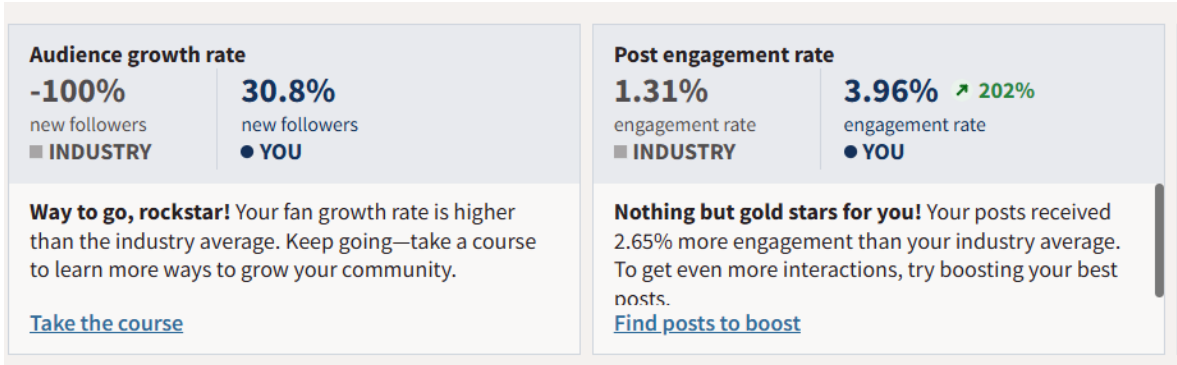
The Taste the Place campaign is an excellent example of the Place Marketing Team working with multiple delivery and media partners across the city of Leicester to build on the profile of the city's food and drink offer celebrating the distinctive city identity, aligned to a wider sub-regional campaign for maximum national impact.

Social Media

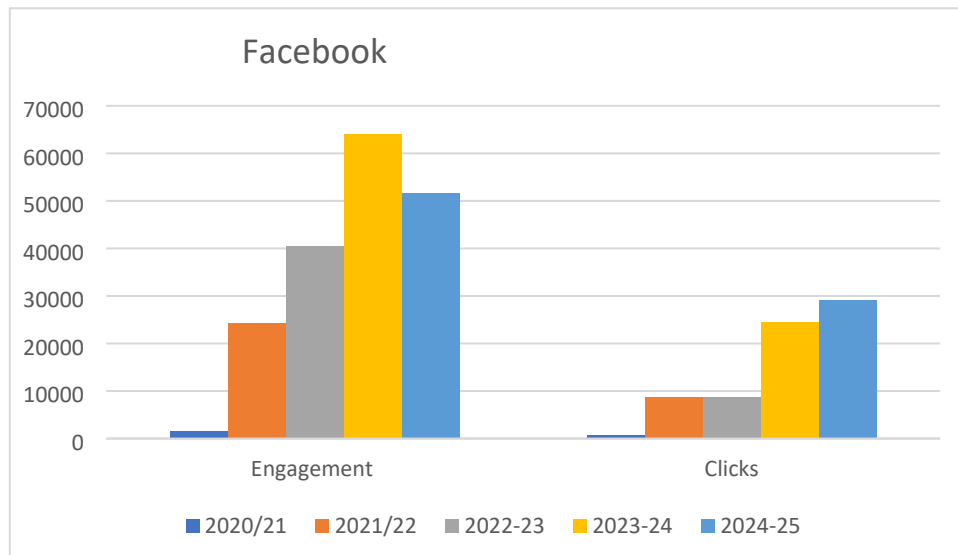
Instagram followers have grown by 31.4% to 15,448, with a reach of 2.6 million users (up by 2.6% from last year).



Industry benchmarking on key metrics (using Travel/Hospitality/Leisure) on Hootsuite puts Visit Leicester's Instagram 202% above the industry average post engagement rate. 2024/25 figures are based on budget year reporting.



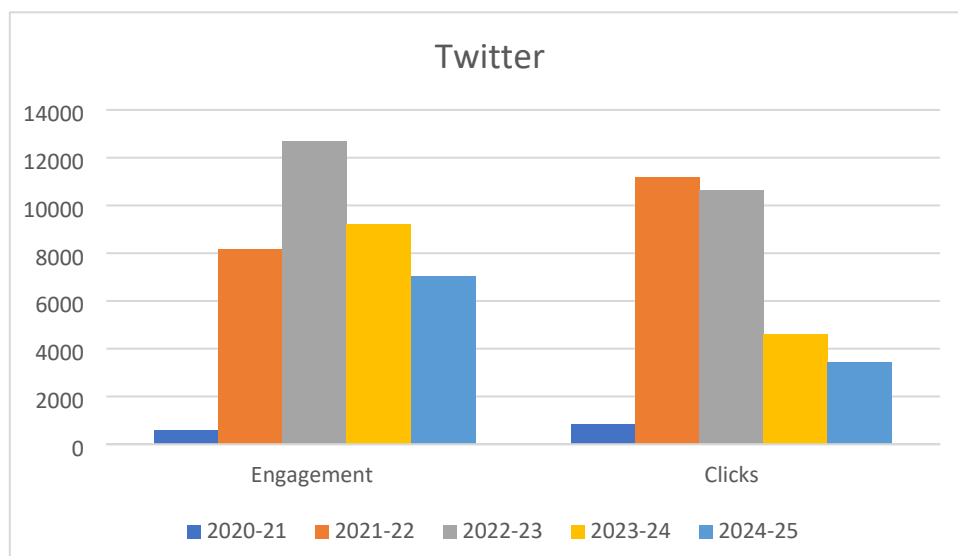
Facebook likes and reactions are keeping pace with last year's record high (with one month of measurement to go. Facebook has proved to be an excellent way to drive customers to the website, with traffic increasing by 19% to 29,179 inbound clicks (again, with a month of measurement to go). 2024/25 figures are based on budget year reporting.

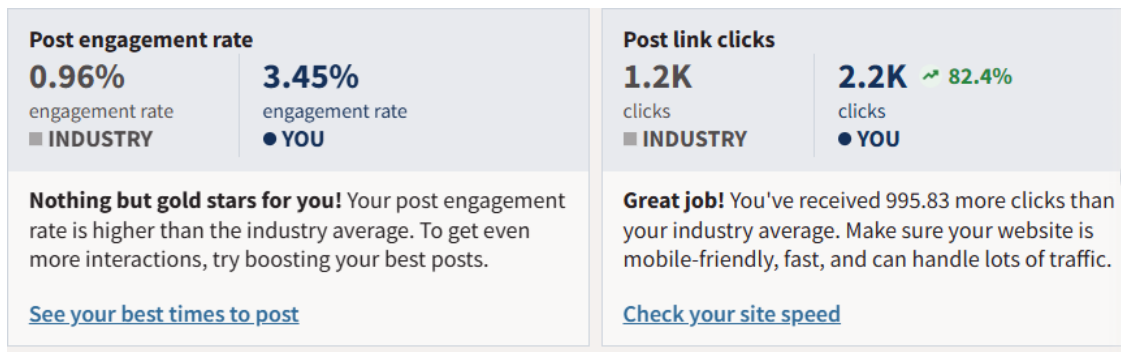


Industry benchmarking on key metrics (using Travel/Hospitality/Leisure) on Hootsuite puts Visit Leicester's Facebook page far above the industry average, on growth rate, Page impressions and Post engagement rate. The Facebook page has maintained its audience growth rate of 11% while the sector as a whole has declined by 100%. Visit Leicester has also increased its post engagement rate from 3% to 3.97%, again outstripping the sector increase.



X (Twitter) continues to decrease in importance as changes to the algorithm and a focus on paid-for accounts affect engagement and click rate. While it remains an important part of Visit Leicester promotional channels (with an audience over 18,000), it is decreasing in effectiveness at reaching new people. The post engagement rate is still above the industry average and link clicks are 82% above the industry average but have fallen as a whole.





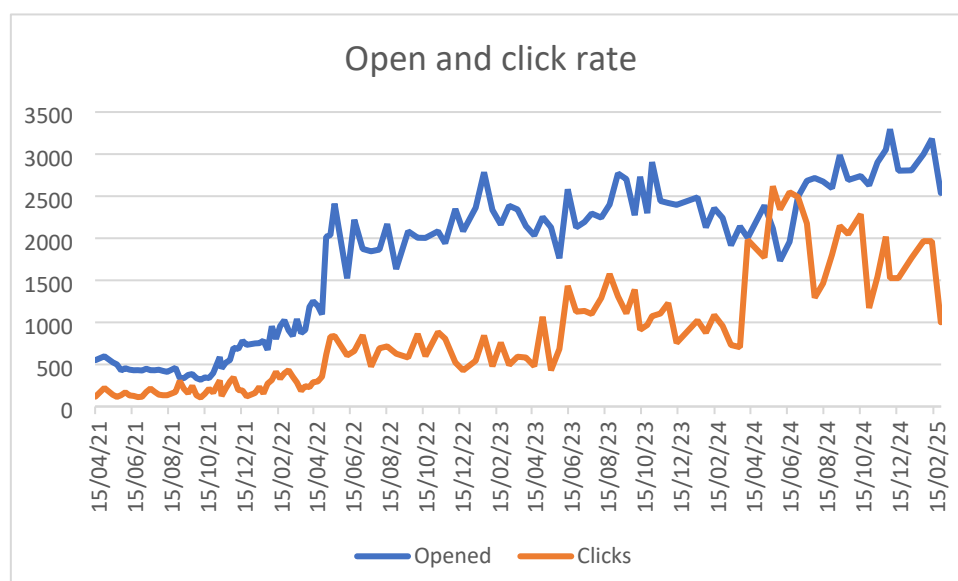
Social media engagement with influencers

The Place Marketing Team works in partnership with a range of influencers on Instagram, particularly using the "partner posts" feature, which displays posts on both the Visit Leicester and the influencer's feed. This brings additional people to the Visit Leicester Instagram page, as they "discover" the page through the influencer's Instagram.

Since partnering with food and lifestyle bloggers, the Visit Leicester Instagram has seen a marked increase in both engagement rate and new followers, demonstrating a "long tail" effect that benefits its Instagram presence. New partnerships with large accounts such as About Leicester (a key promotional partner for Leicester Food Festival) mean an even wider reach. The team will continue to engage new influencers and partners to benefit organic social reach and engagement.

Visit Leicester Newsletter

The Visit Leicester newsletter remains a valuable tool for engaging with and communicating to a long-term interested audience. To maintain a high engagement rate, changes have been implemented that have resulted in excellent open and click rates, well above the industry standard of 20% and 2%, respectively.



Visit Leicester Website

The Visit Leicester website has continued to expand, with a focus on adding updated content, as well as optimising existing content to improve search engine performance. Over the past year, the site was visited by 830,070 users and viewed 2,210,264 times. Over 75% of the Visit Leicester website users are on mobile or tablet devices. This ever-increasing figure has meant that new campaigns and webpages have been optimised for these devices, such as reduction of image size, formatting alterations and regular testing of pages on those devices.

Due to changes in tracking and privacy settings, it is becoming increasingly difficult to track the location of users, and most captured user data has no information on where they are from. However, there are indicators of which city regions some of the users originate. Excluding Leicester & Leicestershire, the top 10 comprises of:

- London
- Birmingham
- Loughborough
- Wolverhampton
- Milton Keynes
- Norwich
- Sheffield
- Coventry
- Cardiff
- Edinburgh

Visit Leicester Website - Campaign Performance

Each campaign on the Visit Leicester website has several landing pages which display campaign content such as videos, introductory text, and links to discover more. The rest of the campaign content on the website comprises of venue listing pages, with information, copy and imagery specific to each business involved in the campaign.

Over the past year, views to the campaign pages are as follows:

- Uncover the Story – 172,361 views
- Taste the Place – 257,217 views
- Fitcation - 28,498 views

Local Visitor Economy Partnership (LVEP) status

As part of the new portfolio of nationally supported, strategic, and high-performing LVEPs, Visit Leicester has agreed an Action Plan with Visit England to build a shared ambition for growth in Leicester and Leicestershire.

To ensure well-informed decision making, a robust governance will oversee the LVEP including the LVEP Advisory Board (formally Tourism Advisory Board) which will assume accountability for the LVEP and the agreed actions in the plan. The Place Marketing Coordination Group (PMCG) includes senior representatives from upper tier local authorities, district council representation, Business Skills Partnership and LVEP Advisory Board Chair. The structure will prioritise the inclusion of diverse viewpoints, fostering a comprehensive understanding of the local tourism landscape. Quarterly meetings take place with the PMCG and LVEP Advisory Board to track LVEP progress towards achieving its agreed objectives.

The overarching priorities for 2024/5 are the following:

- To continue delivering the Tourism Growth Plan 2020–25 and Tourism Action Plan 2020-25, including the continuation and delivery of the three key destination campaigns: Uncover the Story, Fitcation and Taste the Place

- Commence engagement on the Destination Management Plan (2026 –2030) and refreshed Tourism Action Plan 2026-30, to launch in January 2026
- To leverage annual tourism data and insights to refine priorities within the plans
- Implement city sustainable and regenerative tourism initiatives in preparation for a dedicated section for both sustainability and accessibility on the website, highlighting innovation and best practice amongst local tourism businesses
- Implement an accessible online business support directory and skills information hub for tourism businesses
- Establish and deliver a commercial strategy, providing paid consultancy services to tourism businesses
- Bid for tourism funding in partnership with district tourism leads, exploring opportunities linked to the UK Shared Prosperity Fund

Sustainable Tourism

As a key priority area, a sustainable and regenerative tourism action plan will be developed with a focus on business support and a recognition of best practice locally. Businesses will be encouraged to participate in a sustainable tourism accreditation programme and case studies will be featured on the Visit Leicester site. By highlighting businesses that are leading the way in sustainable practices, a dedicated website feature will inspire visitors to make environmentally conscious choices during their visits. It will also be a way of recognising and celebrating local businesses that are championing sustainability within the tourism industry.

There is both a Business to Consumer and a Business-to-Business focus in the campaign, and messaging will be aimed at both. In building awareness and storytelling, Visit Leicester hope to encourage more businesses around the city to gain accreditation and become part of the wider campaign.



Group Travel

The Group Travel Guide for Leicester and Leicestershire was refreshed in 2024 ready to take to the Group Leisure and Travel Show in Milton Keynes. The guide features over 50 unique bookable group experiences, 13 of which are located in the city and the majority of accommodation offers are in the city, with a choice of 7 different options.



Visit Leicester partnered with private sector group travel attractions (Including Curve, KRIII Visitor Centre) and districts to take a large stand to the Group Leisure & Travel Show in Milton Keynes. The partner contributions to the booking costs enabled Visit Leicester to be represented at zero cost to the city council and we made a small surplus of £439.00. We added another 80 new contacts to our database. Attendance at group travel shows since 2022 has enabled us to build a database of over 600 group travel organisers to which we send quarterly newsletters. The audience is engaged and over the last year the newsletter has achieved an average open rate of 24.4% and click rate 5.91%.

We also worked with Group Travel World to send copies of the guide to the Excursions Group Travel Show in London where KRIII Visitor Centre and Belvoir Castle booked a stand. The Place Marketing Manager attended the show as a delegate and confirmed that all 50 guides were given out and also spoke to group travel organisations about bringing some group travel fam trips to Leicester.

Attendance at events has led to group travel bookings as detailed in this scrutiny report summary. Visit Leicester is also working with the Coach Tours Association who are interested to bring a large group travel event to Leicester in February 2027.



For the third year running Visit Leicester (Leicester and Leicestershire) has been shortlisted as a finalist for the Group Leisure and Travel Awards in the category Best UK Destination for Groups, which will be announced in June 2025.

Visit Leicester recently shared some group travel itinerary ideas with group travel press and organisations. This has been picked up by:

- Blue Print Guide to Group Travel [Bring your group to the birthplace of UK tourism](#)
- AGTO Group Travel Newsletter
- Group Leisure and Travel Magazine
- Group Travel World

It has also resulted in a request to run a competition with the Group Leisure and Travel magazine readers to win a visit to Leicester.

Press Releases

Visit Leicester produced and distributed 14 press releases during the period. These covered various topics including What's new, Tourism STEAM data, LVEP accreditation, Group Leisure and Travel Awards finalists, creative industry anniversaries, Olympic sports, England's Curry Capital and KRIII Anniversaries.

PR for the launch of Ice Skate Leicester resulted in the best turnout of media and social influencers that we have seen, with local radio, BBC East Midlands, ITV central all attending and featuring Christmas in Leicester and the ice rink.

Travel Press Fam Visits

We hosted several press visits during the last 12 months which resulted in these features:

Mail on Sunday (James March) - Kings, ruins, and THAT car park... it's no mystery why Leicester is a history hotspot [PressReader.com](https://www.pressreader.com) - [Digital Newspaper & Magazine Subscriptions](#)

Aspire Magazine – A city of culture and culinary delights.



Birmingham Mail – Nothing Leicester than your little ones deserve!





Response to EDTCE Scrutiny Recommendations on bus lanes

- 1) Bus lanes remain an element to support passenger transport, benefitting city residents, businesses and visitors. They remain open to cyclists, Hackney Carriages and emergency vehicles at all times of operation. The use of motorcycles in bus lanes should be reviewed in the context of a forthcoming response by Government to consultation held in 2024.

Response

- a. **Agree the importance of Bus Lanes to support passenger transport in the City.**
 - b. **A previous scrutiny review considered whether to permit motorcycles to use Leicester's bus lanes (April 2016 - [Residents Parking Scheme Survey Results](#)). It was found that, at the time, a change of policy was unwarranted. There has been no material change to the position since, and government documents in response to a recent consultation found no outright benefit to changing the position nor guidance.**
- 2) Bus lane design should be bespoke to the local context in terms of the layout and hours of operation. All bus lanes will be subject to public consultation to inform design.

Response

- a. **Agree it is fundamental that schemes are well designed, considerate of the environment, and are locally supported. Bus lane schemes require a Traffic Regulation Order (TRO) and as such will always include public consultation. We will continue to commit to high quality, effective consultation on all schemes and maintain high quality design standards.**
- 3) New bus lane design and the review of existing bus lanes should take into account the need to deliver smoother, reliable journeys for buses and also aim to achieve balance and avoid impact on general traffic.

Response

- a. **Agree. We will always be mindful of the need for the correct balance to be struck between improving the quality and reliability of journey for buses and the impacts this may have on other classes of traffic, which will include good quality design that retains or improves capacity or leads to a net improvement on city congestion figures.**
- 4) Existing bus lanes should be subject to review in terms of layout and hours of operation, with potential for camera enforcement considered. Priority should be given to locations where there is a negative impact on bus service reliability, or where there is an impact due to congestion outside of peak hours.

Response

- a. **We note the responses from bus operators, and will continue to engage with them on potential improvements where there is an impact on reliability. This may for example lead to enhanced traffic enforcement action, the installation of camera enforcement for persistent breaches of bus lane operations, or amendments to hours of operation.**

- b. **We will, additionally, request that officers review the impacts of the city's bus lanes to identify if there is any clear evidence of additional congestion caused outside of peak hours, though we recognise the significant investment of officer time required to do this and the need to prioritise this as a phased approach when resources permit.**
- 5) Visibility of camera enforcement should be maximised within the scope of permissible regulations to avoid unnecessary fines, with reference to best practice.

Response

- a. **Agree. Officers routinely review the provision of signage on the city's bus lanes, to ensure they are fully compliant so as to be both clear to drivers and enforceable. We welcome any suggestions as to where signage could be more visible or explicit**

20mph Programme Update

EDTCE Scrutiny

Date of meeting: 23 April 2025

Lead director/officer: Daniel Pearman

Useful information

- Ward(s) affected: All Wards
- Report author: Daniel Pearman
- Author contact details: 0116 454 3061
- Report version number: 01

1. Purpose of Report

- 1.1 To provide members of the commission with an update on the progress of the City's 20mph programme
- 1.2 To provide members of the commission with details on the next phases of the City's 20mph programme

2.	Summary
2.1	The EDTCE scrutiny commission established a task group to review the 20mph programme in 2023, with the findings of this group reported back to the commission in January 2024.
2.2	<p>The commission recommended that:</p> <ul style="list-style-type: none"> i The 20mph streets programme to continue to be implemented on a bespoke basis, in order to consider and be coordinated with complementary sustainable highway improvements where appropriate. ii The Council is committed to introducing 20mph streets in 80% of non-strategic roads by 2027, however the Task Group would like to see an ambition to achieve 100% of appropriate residential streets to be converted to 20mph zones by 2030. iii The 20mph programme should generally exclude A/Strategic roads. iv The 20mph implementation process should incorporate post completion feedback to understand how the scheme is operating and review whether any changes may be required to the area itself or adjacent areas. Consideration should be given to further engagement with local residents. v Air quality in 20mph schemes to continue to be monitored and reported where possible. vi The 20mph schemes should incorporate appropriate measures to ensure as much as possible they are self-enforcing.
2.3	The commission also requested that officers return with an update in the future. This report and presentation fulfils that request.
2.4	The current 20mph programme began in 2012, and has so far delivered 114 bespoke schemes, making a total of 1,756 streets within a 20mph speed limit or zone – 63% of suitable streets.
2.5	Schemes are now programmed through March 2028, which will result in 81% of suitable streets being within a 20mph speed limit or zone.
2.6	Suitable streets are defined as all roads that are not classification ‘A’ roads.
2.7	The approach continues to ensure that schemes are bespoke, with traffic calming features – speed cushions – installed where necessary to ensure that average speeds are at 24mph or below, in line with government guidance as found in Traffic Circular 01/2013 <i>Setting Local Speed Limits</i> .
2.8	All 20mph schemes are subject to consultation, and we have found consistent support for our approach across the city.
2.9	Across the entire programme, there has been a 21% response rate to consultation (high response rate for transport projects) – with an average approval rate of 83% for the 20mph scheme and 72% for traffic calming (when proposed).
2.10	Since the conclusion of the previous session, officers have continued to explore opportunities to develop the programme to enable us to meet both the executive target and the extension recommended by the commission. We have so far introduced administrative changes to the process to reduce processing time for traffic orders as well as extending the programme forecast beyond achieving the 80% target, to allow for ongoing delivery.

- 2.11 In response to the specific scrutiny recommendations:
- i All capital transport and highway delivery pipelines are coordinated. Transport projects are reviewed at conception to identify if the project is within a 20mph zone/limit, if there are proposals for delivery, or if it is in the future programme. If applicable, projects are merged at that point.
 - ii As above, the programme has been projected to encompass 100% of suitable city streets, to ensure that we can continue without pause in delivery after achieving the 80% target.
 - iii Including only suitable streets is a principle of the programme, and there are no plans for 20mph speed limits or zones on either strategically important or A roads.
 - iv We are in the process of adjusting our monitoring approach to ensure it is aligned with government guidance on best practice, and assessing how we can collect both qualitative and quantifiable data in a way that allows comparisons and interacts with our existing datasets. We have scheduled traffic surveys for a random sampling of 20mph streets over the next financial year to sample compliance across projects, implementation methods, areas, and delivery years.
 - v Extended monitoring of air quality is a key consideration as part of both the above process and our review of air quality monitoring following adoption of the Air Quality Action Plan.
 - vi Where traffic speeds are assessed to be over 24mph, officers will recommend traffic calming. In the majority of cases we will recommend speed cushions, as these are efficient and cost-effective, allowing us to continue the programme at pace.
- 2.12 All works related to delivery are funded from the Transport Improvements Works budget, which is sourced from annual allocations of the Government's (DfT) Integrated Transport Block.

3. Financial, legal, equalities, climate emergency, and other implications

3.1 Financial Implications

Works within the 20mph programme are funded via the Transport Improvements Works budget, and in turn the Integrated Transport Blocks. The programme is scalable, and can therefore adapt to the level of resource available and priorities within the wider transport capital delivery programme.

Finance Capital 3 April 2025

3.2 Legal Implications

No legal implications identified following legal services review

7 April 2025

3.3 Equality Implications

Under the Equality Act 2010, public authorities have a Public Sector Equality Duty (PSED) which requires us to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between those who share a protected characteristic as defined by the Equality Act 2010 (sex, sexual orientation, gender reassignment, disability, race, religion or belief, marriage and civil partnership, pregnancy and maternity, age) and those who do not.

In keeping with our PSED, we are required to pay due regard to any negative impacts on people with protected characteristics arising from our decisions (and this would include decisions on how we deliver our services) and put in place mitigating actions to reduce or remove those negative impacts.

The report provides an update on the City's 20mph programme and notes that for each scheme residents' views are sought and this is vital in giving due regard to any potential equality implications. Any larger schemes may warrant the need for an equality impact assessment. Lower speed limits make roads safer for pedestrians and cyclists, and in particular for children, disabled and older people, all of whom are particularly vulnerable to road traffic collisions.

Sukhi Biring, Equalities Officer 3 April 2025

3.4 Climate Emergency Implications

20mph zones contribute to creating more favourable conditions for active travel and any increases in the proportion of trips made by active travel will have a positive impact on reducing carbon emissions from travel in the city.

Duncan Bell, Change Manager (Climate Emergency). 4 April 2025

3.5 Other Implications

None

4. Appendices and other papers

4.1 Presentation – 20mph Update.pptx

20mph Update

EDTCE Scrutiny

23 April 2025

Programme Progress

- 63% of suitable city streets:
 - 114 separate projects
 - 1,756 streets
- 168 • Suitable defined as any non A-class roads within the city boundary.
- Overall public response:
 - 58315 total residents consulted
 - 21% of residents respond to surveys – high for transport projects
 - Average approval of 83% for 20mph schemes
 - Average approval of 72% of traffic calming, when proposed.

Previous Recommendations

1. The 20mph streets programme to continue to be implemented on a bespoke basis, in order to consider and be coordinated with complementary sustainable highway improvements where appropriate.
2. The Council is committed to introducing 20mph streets in 80% of non-strategic roads by 2027, however the Task Group would like to see an ambition to achieve 100% of appropriate residential streets to be converted to 20mph zones by 2030.
3. The 20mph programme should generally exclude A/Strategic roads.
4. The 20mph implementation process should incorporate post completion feedback to understand how the scheme is operating and review whether any changes may be required to the area itself or adjacent areas. Consideration should be given to further engagement with local residents.
5. Air quality in 20mph schemes to continue to be monitored and reported where possible.
6. The 20mph schemes should incorporate appropriate measures to ensure as much as possible they are self-enforcing.

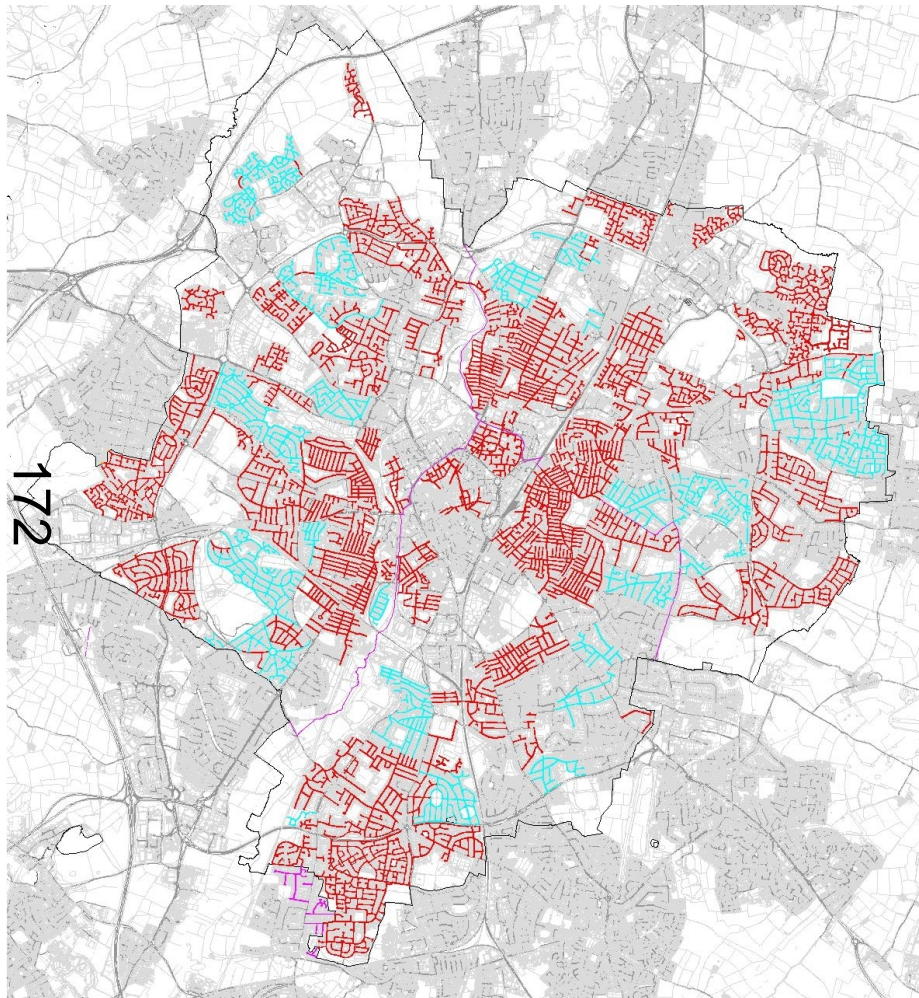
Previous Recommendations

1. All capital transport and highway delivery pipelines are now shared. Transport projects are reviewed at conception to identify if the project is within a 20mph zone/limit, if there are proposals for delivery, or if it is in the future programme. If applicable, projects are merged at that point.
2. As above, the programme has been projected to encompass 100% of suitable city streets, to ensure that we can continue without pause or break of delivery after achieving the 80% target
3. This remains a principle of the programme, and there are no plans for 20mph speed limits or zones on either category of road
4. We are in the process of adjusting our monitoring approach to ensure it is aligned with government guidance on best practice, and assessing how we can collect both qualitative and quantifiable data in a way that allows comparisons and interacts with our existing datasets. We have scheduled traffic surveys for a random sampling of 20mph streets over the next financial year to sample compliance across projects, implementation methods, areas, and delivery years.
5. This is a consideration as part of both the above process and our review of air quality monitoring following adoption of the Air Quality Action Plan.
6. This remains the case – where traffic speeds are assessed to be over 24mph, officers will recommend traffic calming. In the majority of cases we will recommend speed cushions, as these are efficient and cost-effective, allowing us to continue the programme at pace.

Animation – 20mph Programme Progress

171





20mph Streets

- Red – Existing 20mph streets
- Cyan – Programmed 20mph streets
- Purple - Existing 20mph streets which overlap Leicestershire County

Next Stages

- New batch of schemes due for installation and commencement over the coming weeks.
- 25/26 projects confirmed and notification to ward councillors will be issued shortly, alongside scheduling traffic surveys where needed and assigning officer resource.
- Digitisation of the 20mph programme and map underway, to enable publication on Leicester Open Data.

Local Cycling and Walking Infrastructure Plan

EDTCE Scrutiny

Date of meeting: 23 April 2025

Lead director/officer: Daniel Pearman

Useful information

- Ward(s) affected: All Wards
- Report author: Daniel Pearman
- Author contact details: 0116 454 3061
- Report version number: 01

1. Purpose of Report

- 1.1 To provide members of the commission with details on the proposed Local Cycling and Walking Infrastructure Plan
- 1.2 To make members of the commission aware of the forthcoming consultation, and provide details for how they may contribute to the plan.

2. Summary

- 2.1 A Local Cycling and Walking Infrastructure Plan (LCWIP) is a strategic document that outlines potential improvements to walking and cycling networks, and is a government requirement to access walking and cycling funding.
- 2.2 This provides an opportunity for early public and stakeholder engagement in the development of cycling and walking schemes.
- 2.3 The development process is held in government guidance issued in 2017, that was condensed into LTN 1/20 *Cycle Infrastructure Design*.
- 2.4 The council has previously maintained a number of documents that have operated, collectively, as an LCWIP – the Cycle City Action Plan, Walk Leicester Action Plan, Covid-19 Transport Recovery Plan, and the Local Transport Plan.
- 2.5 Given the progress on the Connecting Leicester and Transforming Cities Fund programmes, there is now a need to establish a plan for the next generation of cycling and walking schemes.
- 2.6 The LCWIP will be taken through a public consultation exercise in the coming months, the outcomes of which will be used to amend the document prior to publication.
- 2.7 This consultation will use an interactive platform that allows people to make comments simply using an online map – they can place points on specific locations to make suggestions or comments specific to the area.
- 2.8 Individual projects will follow the usual level of public engagement and consultation at the appropriate stage of delivery.
- 2.9 Delivery will be dependent on funding from central government or other sources, given the complexity of many schemes within the plan.

3. Development of the LCWIP

- 3.1 As noted, the LCWIP uses an evidence based approach, specified by government guidance, to identify where infrastructure to support walking or cycling would generate the most benefit.
- 3.2 The LCWIP has been built along five principles and outcomes, as outlined in government guidance:
- i Coherence
 - ii Directness
 - iii Safety
 - iv Comfort
 - v Attractiveness
- 3.3 Route and infrastructure options included within the LCWIP should deliver on these outcomes.
- 3.4 The LCWIP uses two different digital models, one for walking and one for cycling, that identifies areas and locations that can be most beneficial to enabling trips. The models account for population density, destinations, travel patterns, existing infrastructure, and other metrics.
- 3.5 Once established from the digital models, high priority walking zones, walking routes, and cycling routes were taken through detailed audit processes.
- 3.6 Audits were undertaken by transport officers using advice from government guidance:
- 3.7 Walking zone and route audits identify current opportunities to enhance the walking environment, such as the provision of new seating, greenery, crossings, or improvements to junctions or other concerns along the route.
- 3.8 Cycling audits scored the existing environment for cycling, identifying current issues that would need to be resolved as part of the design for any future cycling schemes.
- 3.9 The priority walking zones, walking routes, and cycle routes identified through this process will be the subject of the forthcoming consultation.
- 3.10 It is proposed that we undertake a separate informal engagement and review process is undertaken with the members of the scrutiny commission during this phase.
- 3.11 Following consultation, priorities will be confirmed and the document finalised. There will still need to be detailed design work to undertaken for individual projects, which will include the usual levels of public engagement and consultation.
- 3.12 The LCWIP is intended to be a 'living document' and will be reviewed regularly to ensure that delivered routes or improvements are removed and priorities are updated as necessary.

4. Financial, legal, equalities, climate emergency, and other implications

4.1 Financial Implications

Development of the LCWIP has been funded via dedicated grants from Active Travel England. Schemes and projects within the plan are subject to future funding and prioritisation within capital transport workstreams and will be value assessed at point of design.

Finance Capital 3 April 2025

4.2 Legal Implications

No legal implications identified following legal services review

7 April 2025

4.3 Equality Implications

Under the Equality Act 2010, public authorities have a Public Sector Equality Duty (PSED) which requires us to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between those who share a protected characteristic as defined by the Equality Act 2010 (sex, sexual orientation, gender reassignment, disability, race, religion or belief, marriage and civil partnership, pregnancy and maternity, age) and those who do not.

In keeping with our PSED, we are required to pay due regard to any negative impacts on people with protected characteristics arising from our decisions (and this would include decisions on how we deliver our services) and put in place mitigating actions to reduce or remove those negative impacts.

The report provides details on the proposed Local Cycling and Walking Infrastructure Plan and the forthcoming consultation. The plan aims to create more accessible, safer and attractive environments for walking and cycling for everyone, which in turn can for example help to address health inequalities, improve accessibility and safety, and promote social inclusion.

We need to ensure that the consultation on the plan is accessible and includes engagement with a wide range of stakeholders. Walking and cycling schemes will be implemented across the city and we need to ensure due regard is given to equality considerations and larger schemes may warrant the need for an Equality Impact Assessment.

Sukhi Biring, Equalities Officer 3 April 2025

4.4 Climate Emergency Implications

Increasing the proportion of journeys made by active travel - which produces no, or minimal, carbon emissions - is an important part of the council's strategy for working towards a 'climate ready' net zero city. Hence, the new Local Cycling and Walking Infrastructure Plan will be an important document in the council's overall work to tackle the climate emergency. When it gets to the stage of implementing the plan, then wherever the effect of infrastructure improvements on raising walking and cycling levels can be

monitored post-completion of schemes, the resulting impact on carbon emissions may also be able to be measured.

Duncan Bell, Change Manager (Climate Emergency). 4 April 2025

4.5 **Other Implications**

None

5. Appendices and other papers

5.1 Presentation – LCWIP.pptx

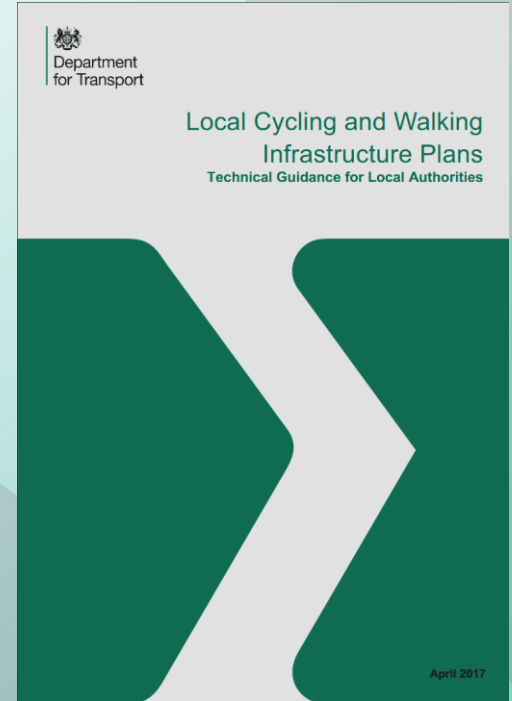
Local Cycling and Walking Infrastructure Plan

EDTCE Scrutiny

23 April 2025

What is an LCWIP?

- Local Cycling and Walking Infrastructure Plan
- Strategic document that outlines how to develop walking and cycling infrastructure within the authority, to promote more journeys by walking, cycling, or wheeling.
- Developed using the framework guidance issued by the Department for Transport



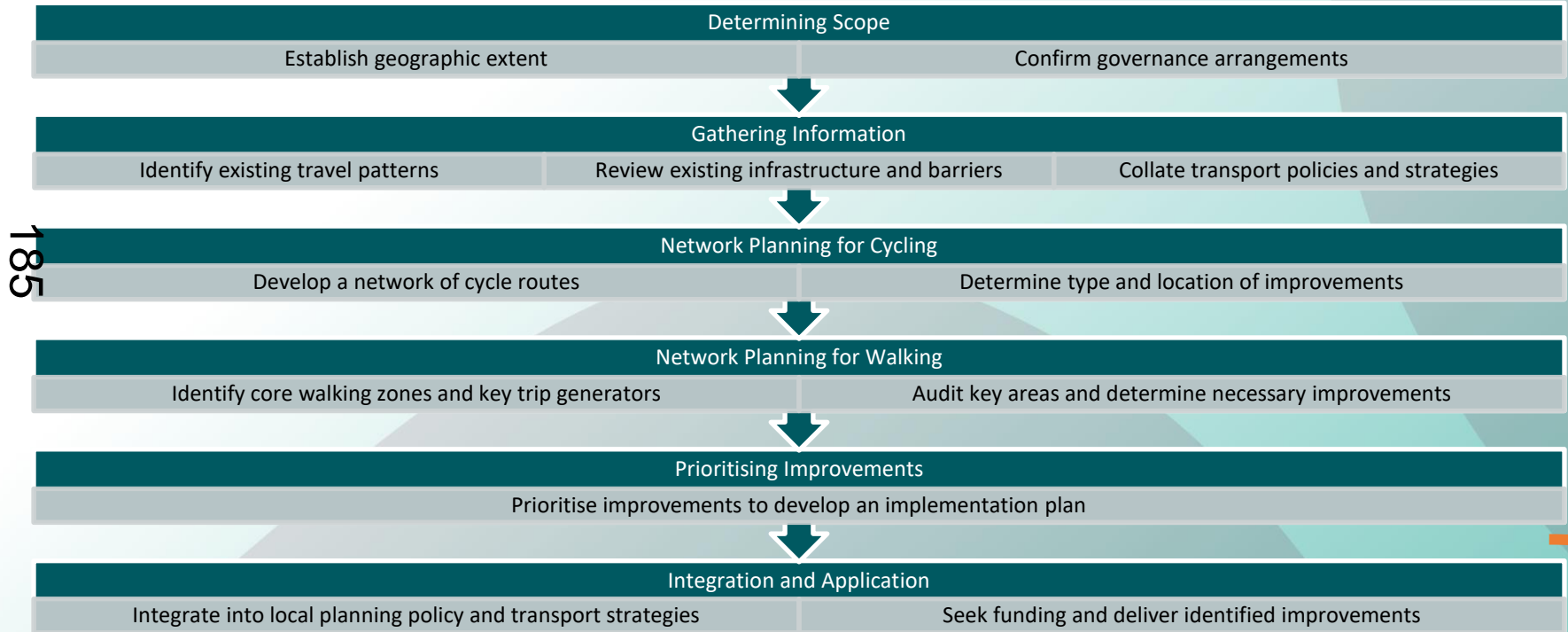
What the LCWIP is...

- A list of future schemes, ranked and prioritised, that can support future funding.
- 81• A requirement from government to enable us to access walking and cycling funding.
- A means of supporting and recognising key corridors for multi-modal journeys.

...and what the LCWIP isn't

- A compendium of fully designed and costed schemes, each project will need individual design, development and appropriate consultation
- A static document, it requires updating as the transport picture of the city and region changes.
- An isolated document, it is supported by other plans, documents, and strategies.

LCWIP Process



Why?

Health

£1B a year cost to the NHS due to inactivity

32.5% of Leicester adults considered physically inactive – some of the highest in the UK

Decarbonisation

29% of all domestic emissions are from road transport

Passenger cars alone are 16% of emissions, over 60% of car journeys are under 5 miles

Air quality

66% of NO2 emissions in the city attributable to motor traffic

Up to 36,000 deaths a year can be attributed to poor air quality, nationally

Congestion

Traffic volumes expected to grow by between 8 to 54% in Leicester by 2060. Road capacity unable to cope with this demand

Only solution for urban congestion is more efficient modes. Walking, wheeling, cycling, passenger transport

Economy

Up to 30% increase in footfall and sales from areas with well connected cycle infrastructure

Regular cyclists or walkers take 1.3 fewer sick days annually, annual productivity benefit of £100m from this group alone.

Safety

245 pedestrian killed or seriously injured between 2016 and 2021; 103 cyclists killed or seriously injured for the same period

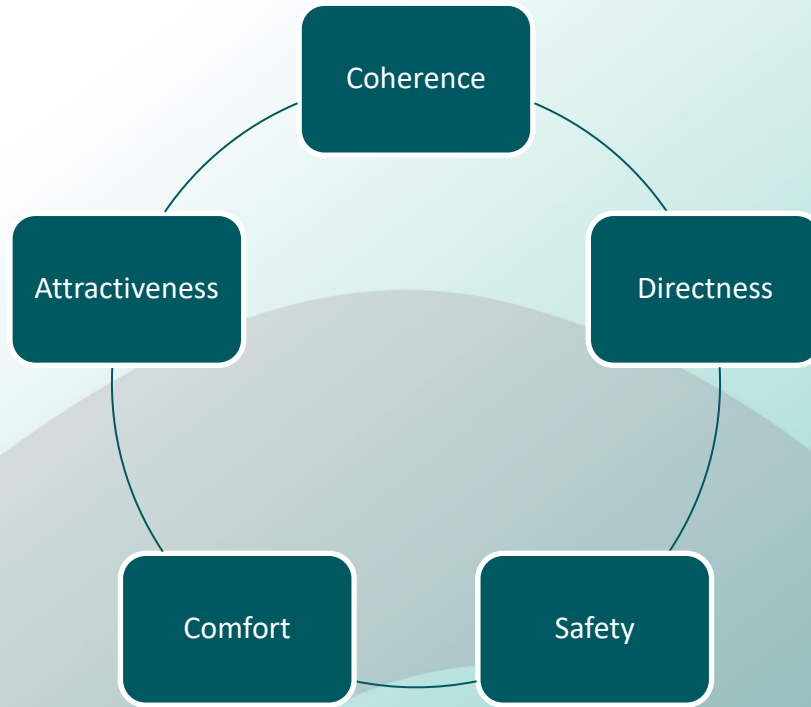
Safety and perception of safety the primary barrier to people opting to walk or cycle for journeys

Equality

33% of households have no access to a car or van

64% of disabled cyclists found cycling easier than walking, and identified poor infrastructure as a primary barrier

Principles of the LCWIP



Elements

Walking Zones

- Areas of high density, that support multiple origin and destination trips

Walking Routes

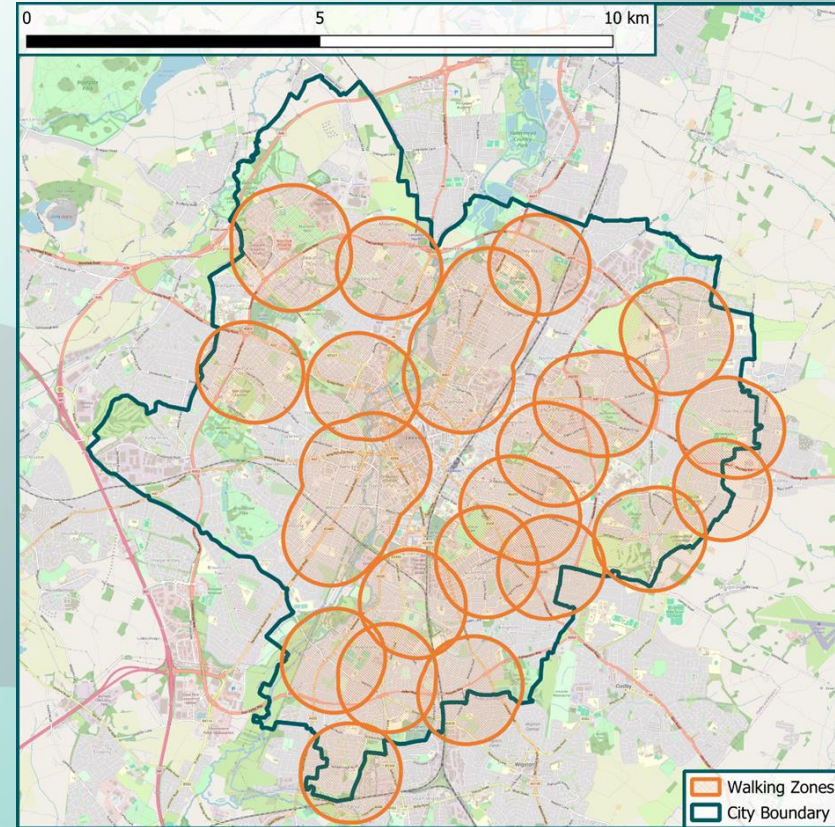
- Defined routes between multiple origins and destinations

Cycling Routes

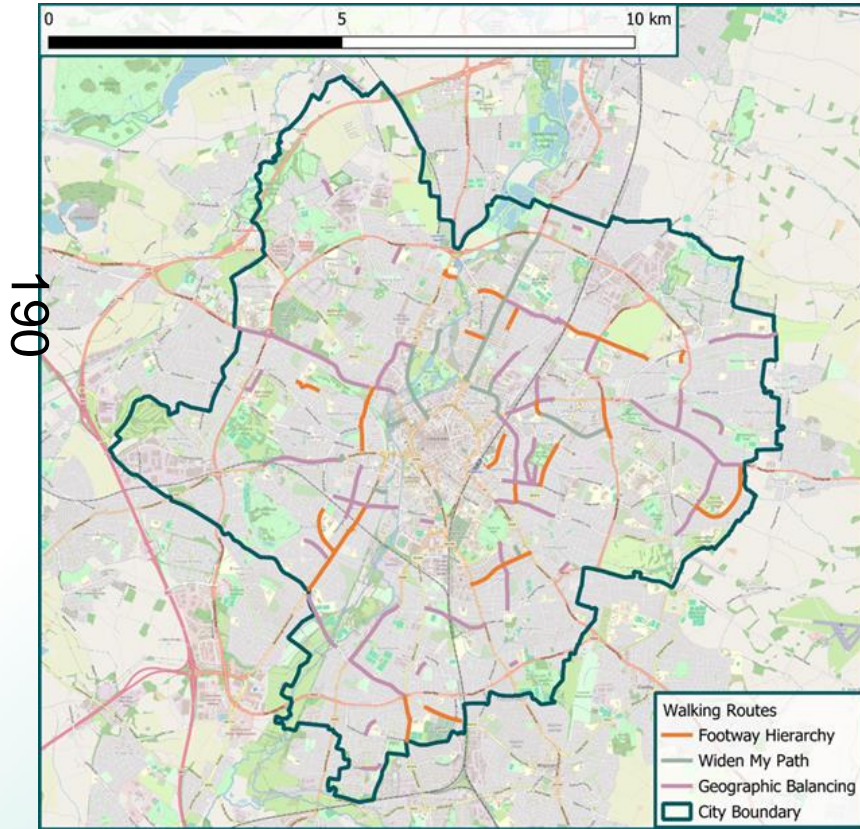
- Key routes that have the potential of supporting a large volume of journeys between multiple origins and destinations

Walking Zones

- 800m (five minute walk at average pace) around local centres.
- Ranked based on:
 - Residential and workplace population
 - Types of amenities available within the zone
 - Number of schools
 - Number of bus stops



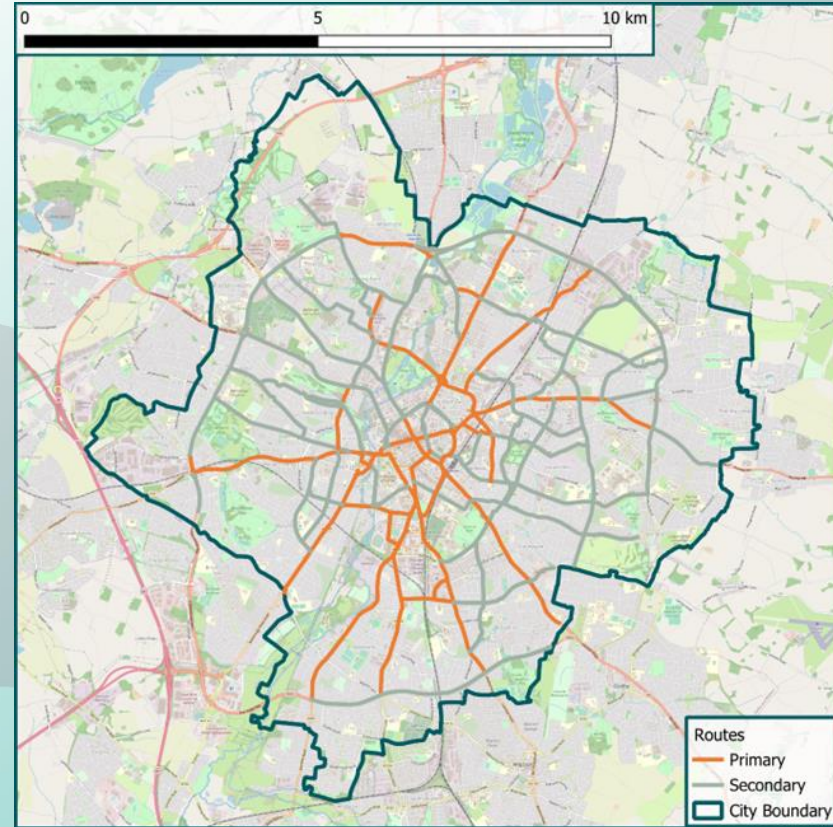
Walking Routes



- 74 routes identified across all zones.
- Routes identified based on a variety of criteria:
 - Inspection hierarchy and frequency
 - Usage
 - Previous or historical requests
 - Key link on school journeys

Cycling Routes

- 102 total routes identified, 34 priority (top 3rd after audit)
- Routes audited based on existing infrastructure and scored against the 5 LCWIP principles



Consultation

- Will be hosted on a map based platform to enable responders to comment against specific areas or points of concern.
- Feedback from the consultation will be used to ensure priorities are appropriate and areas of concern are identified.
- Consultation on individual schemes will only take place when they come forward for design or delivery.

Next stages

- Members of the commission invited to an informal review session to provide feedback against identified zones and routes.
- Consultation is expected to begin within the next few months.
- Consultation will run for 8 weeks, officers will review responses over the summer and amend as necessary.
- LCWIP will be finalised in September.

Economic Development, Transport and Climate Emergency Scrutiny Commission (EDTCE)
Work Programme 2024 – 2025

Meeting Date	Item	Recommendations / Actions	Progress
18 July 2024	1) An overview presentation of EDTCE services and key issues. 2) Terms of Reference. 3) 24-hour Bus Lanes – informal session scope. 4) Worker Exploitation – Informal session scope.	1a) EDTCE to have oversight of decision-making process regarding marketplace. 1b) Issue of air quality to be engaged with. 1c) Report on implications of new government to come to the Commission once they were clearer. 3a) Gain information on whether government funding can be used to increase bus services. 3b) Dates for meetings and relevant stakeholders to be identified for task group 4) Members of Culture and Neighbourhoods Scrutiny to be invited to task group.	1a) Reports have come to EDTCE. 1b) Considered at meeting on 28 August. 1c) Added to workplan TBA. 3a) Task group complete. 3b) Task Group complete. 4) Members invited.

Meeting Date	Item	Recommendations / Actions	Progress
28 August 2024	1) Levelling up - Workspace Update – including sustainability of buildings. 2) Rally Park Update. 3) Market Place – Questions to City Mayor. 4) Electric Vehicle Charging – Informal Scrutiny Report. 5) Air Quality Report	2) Breakdown and further details of paths, plants, surfacing material and lighting to be shared with the Commission. 3) Report regarding option taken to come to the Commission to include more information to be given on option of partially covering square and potential ways to manage ASB in the area. 5a) Signalling and Smart Controllers to be looked into and taken forward when opportunities arise. 5b) Members to engage with consultation with schools on green energy products.	3) Report brought to scrutiny.
6 November 2024	1) 20mph review – Executive Response 2) Market Place report 3) Heart of Leicester Plan 4) Bus Lanes Informal Scrutiny – Verbal Update	2) Meeting to be set up for scrutiny to have oversight. 3a) Consideration should be given in the plan to the evening economy 3b) Consideration of proposed development areas referred to in Heart of Leicester Presentation to be considered by the Commission. 3c) Need for additional bike stands noted – reference made to planned secure bike parking facilities. 3d) Paving reinstatement on Marble St to be looked at.	2) Meeting has taken place. 3a) Noted. 3b) Added to workplan TBA. 3c) Noted. 3d) Noted.

Meeting Date	Item	Recommendations / Actions	Progress
8 January 2025	1) Draft General Revenue Budget and Draft Capital Programme 2025/26 2) Ashton Green development update 3) 24-Hour Bus Lanes – Informal Scrutiny Report.	1a) Members to be informed about assets being considered for disposal. 1b) Members to be kept informed of budget ceilings. 2a) Officers to liaise on buses and transport. 2b) Bootcamps item for March meeting to include possibility of construction bootcamps in the context of this development. 2c) Formal response regarding efficiency standards to be shared. 2d) Interaction to continue between officers and residents and Councillors	2c) Response shared. 2d) Ongoing.
12 March 2025	1) Market Place – Verbal Update 2) Update on Leicester and Leicestershire Business Skills Partnership 3) Skills Bootcamps 4) ESOL 5) Shared Prosperity Fund – Programme Report. 6) EV Charging Task Group – Executive Response	1a) Copy of consultation to be circulated to members. 1b) Next update to include information on the revenue costs to operate the market 2a) Response to be given with clarity on timelines from the government. 2b) Consideration to be given to the rural and urban makeup of the board and an update provided. 2c) Report to be brought to scrutiny on Adult Skills Devolution once more was known on local govt re-organisation and timeline for devo. 2d) Money in reserves to be confirmed at the end of the financial year. 3) Case studies to be obtained from Annica to establish what it is they do. To be circulated to members. 4) Members to keep the issue in mind.	2a) To come in a paper once relevant information available. Added to Forward Plan. 2b) To come in a paper once relevant information available. Added to Forward Plan. 2c) Added to Forward Plan. 2d) To come in a paper once relevant information available. Added to Forward Plan.

Meeting Date	Item	Recommendations / Actions	Progress
23 April 2025	1) Worker Exploitation Task Group Recommendations. 2) Parking Fees and Charges – Call-in 3) Inward investment and place marketing 4) 24-Hour bus lanes – Executive response. 5) 20mph Update. 6) Local Cycling and Walking Infrastructure Plan	1)Members from Culture and Neighbourhoods Scrutiny who were involved in the group to be invited.	

Forward Plan items (suggested topics)

Topic	Detail	Proposed Date
Connecting Leicester programme – Local Transport Fund		
Bio-Diversity Net Gain		
Waterside Visit – feedback		
Electric Vehicle Strategy		
Local Plan Modifications Consultation.		

Levelling up - Railway Station update.		
Bus Partnership Plan	Postponed from 12 March	
Development Areas in Heart of Leicester Plan		
City Centre Maintenance	To include delivery bike regulation, retail and hospitality, and issues around development and the areas that need it.	
Local Plan	To be considered by scrutiny following the report from the inspectors. Likely to be in 2024/25 municipal year.	
Budget reductions and areas under review	Requested at meeting of 31 st January 2024 when discussing Revenue Budget.	tbc
Implications of new government	Requested at meeting of 18 July 2024	
Adult Skills Devolution	To come once more is known on local govt re-organisation and timeline for devolution.	
Update on Leicester and Leicestershire Business Skills Partnership	To include information on timelines from the government, information on the rural and urban makeup of the board, and money in reserves at the end of the financial year.	

