



Leicester Labour Market Partnership (Textile) Review

November 2020 - March 2022

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1.0 Foreword

We remain committed to promoting the textile industry as an important facet of our local economy. In convening the Leicester Labour Market Partnership, a unique initiative, we aim to promote the highest standards of employment, supporting the local sector to be the best it can be, and to set an example for others to follow.

The Leicester Labour Market Partnership has a three-pronged approach:

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

Since the last review our unique partnership can boast several successes (outlined in this review at appendix A) which we are proud to share, such as:

- Established high profile campaigns with CrimeStoppers and Unseen to raise awareness of modern slavery and labour abuse
- Established business support programmes directed at smaller textile manufacturers
- Actively supported an enforcement plan as part of Operation Tacit to investigate and tackle exploitation and modern-day slavery (MDS), wherever concerns for workers in our textile sector exist.

The Government has committed to establishing a new single enforcement body for employment rights. We await firm proposals to respond to for such a body through the passage of legislation.

In February 2022 Sir Brian Leveson, eminent former judge, Head of Criminal Justice and President of the Queen’s Bench published an annex to his Boohoo commissioned report. The work, published as part of the Agenda for Change programme, sought to investigate steps required and taken to improve practices in the industry. Sir Brian took special interest and dedicated his final annex to the work undertaken in Leicester.

Sir Brian’s analysis accurately reflects both the historical context and the nature of the current issues. The full extract from the annex is set out at appendix B. Sir Brian sums up the work undertaken by partners in Leicester. We were particularly pleased to hear about Sir Brian’s recognition and endorsement of the work of Leicester City Council, finding that “all that Leicester City Council is doing in this area is to be applauded”.

We remain committed to doing all we can to ensure that the textile industry continues to play an important role in Leicester’s local economy, and are, of course, determined to promote the highest standards of employment, with good pay for well-trained workers in safe, productive, and rewarding working environments — and will continue to support and enable our factories to be the best they can be, to set an example that others can follow.

We welcome all stakeholders that join us in our endeavours and share our vision and our values.

Cllr Adam Clarke



2.0 Commitment

The Leicester Labour Market Partners are committed to working with all parties who have an interest in assisting the city's garment manufacturing businesses, and in supporting promoting good jobs so that residents of the city can lead productive lives. Further to this, we have a desire to ensure Leicester has the highest standards of employment in the highest quality environments with the best possible pay and conditions.

Partners:

- ✓ Leicester City Council
- ✓ Citizens Advice
- ✓ Crimestoppers
- ✓ Department for Work and Pensions
- ✓ Employment Agency Standards Inspectorate
- ✓ GAIN
- ✓ Gangmaster and Labour Abuse Authority
- ✓ Health and Safety Executive
- ✓ HM Revenue and Customs
- ✓ Hope for Justice
- ✓ Immigration Enforcement
- ✓ Labour Market Enforcement
- ✓ Leicestershire Police
- ✓ Unseen

3.0 Partnership Objectives



As partners our objectives are:



To promote and encourage compliance across the textile sector operating in Leicester by addressing concerns around labour exploitation and modern slavery.



To ensure that communities and employees within the sector are fully aware of their rights and how to seek support should they need it.



To ensure that the textile sector is fully supported to develop, including supporting the development of manufacturing skills and processes to ensure a sustainable textiles and garments sector.

4.0 Overview of Work Undertaken

Over the course of the last 17 months, the partnership has continued community engagement work with key agencies such as Crimestoppers, Hope for Justice, Citizen's Advice, Gangmasters and Labour Abuse Authority (GLAA), HMRC and other organisations. This engagement work involves agencies working together to ensure that our communities are aware of their rights and how and where to access support.

Alongside proactive engagement work, the last twelve months has also seen further activity through the work of the GLAA, HMRC, the Health and Safety Executive, the National Crime Agency and Leicestershire Police under the auspices of Operation Tacit. Operation Tacit has involved the identification and investigation of labour abuse and modern slavery, with a view to tackling any existing exploitation of workers in our textile sector. We are clear workers have a right to fair, safe, equitable and legally compliant employment, that sustains their health and well-being and that of their families. Wherever there is concern we work with our partners to ensure a joined-up response from those with enforcement powers to robustly investigate and deal with issues.

Whilst our partnership arrangement has focussed on engagement, awareness raising and support from those with enforcement powers, the council has been taking a proactive and leading role around business and textile sector development.

The Council has been delivering a comprehensive business support programme for the textiles sector, working as part of the Business Gateway Growth Hub and with funding from the European Regional Development Fund. We have engaged with more than 200 textiles businesses, providing free impartial advice and enabling access to business grants.

Over £3m of investment/grants from the European Regional Development Fund and Regional Growth Fund have been secured by textiles businesses over recent years. We have also delivered a popular webinar/events programme for textiles businesses around ethical and legal compliance, alongside general business growth support topics.

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

This investment has secured additional funding from the private sector, and we were delighted to be awarded £500,000 from the government's Community Renewal Fund to deliver a new support programme for an initial cohort of Leicester textiles manufacturers, working with partners Fashion Enter and De Montfort University.

Through the work of the Leicester Labour Market Partnership, we aim to prevent anyone from undermining our proud Leicester textile heritage, in whatever way such activity manifests itself. During 2022, we will continue to seek to raise awareness amongst the textile sector work force of their rights to safe, fair and legally compliant employment and we will continue to shine a light on activity to root out exploitation, labour abuse and modern-day slavery whilst we seek, at the same time, to promote a vibrant and appropriately productive textile sector in our great city.

5.0 Areas of Work Undertaken 2021–22 Against Each Objective

5.1 Enforcement — To promote and encourage compliance across the textile sector operating in Leicester by addressing the concerns around labour exploitation and modern slavery.

Outlined below are some examples of work undertaken.

- a. Investigators across the labour market enforcement bodies have constantly been on the ground in Leicester and working with communities in the city for a number of years, meaning they have a well-established knowledge of what is and isn't occurring in its textile industry.
- b. Through Operation TACIT enforcement bodies undertook 386 visits to businesses as of 31 March 2022, providing advice and support to employers to get it right and educating workers to know their rights. Where enforcement bodies have identified non-compliance, they have taken steps to correct this.
- c. However, based on extensive experience, enforcement body findings are that the risks associated with labour market non-compliance in the Leicester textile industry are in line with the rest of the UK manufacturing sector.
- d. Whilst evidence gathered from extensive on the ground operations have found little to suggest widespread non-compliance in the Leicester textiles trade, enforcement bodies recognise that not all businesses are fully compliant, so stand ready to act on any complaints or information received.
- e. Enforcement bodies are committed to ongoing engagement with relevant NGOs in this sector, and direct contact with workers outside of the workplace, helping to break down barriers and encourage people to come forward with concerns in a way that works for them, whilst also working with brands who source from Leicester textiles manufacturers.
- f. All of the enforcement bodies welcome any information on illegal and unsafe employment practices, including for garment workers. Anyone who thinks that they might be being underpaid or their employer has unsafe working practices have continued to be encouraged to contact ACAS (in confidence) by visiting the **pay and work rights** page on the gov.uk website.

5.2 Engagement with Communities and Partners — To ensure that communities and employees within the sector are fully aware of their rights and how to seek support should they need it.

Outlined below are some examples of work undertaken.

Case Study 1

I moved to UK with my husband from Uganda in the 70s. My family is of an Indian descent, I worked in textiles all my life. I never learned how to speak English.

I was forced by my supervisor to give him £270 every month from my pay, saying if I don't pay that I will lose my job, I paid him the money as I didn't want to be jobless. I felt lost. This is when my husband contacted Hope for Justice, who listened to my story and said that they will help me. Somehow, they manage to come into my factory and speak with the owner who believed my story and send the supervisor away. He also paid me all the money that I was forced to give him. I was told that the supervisor will be investigated.

- a. Voluntary Action Leicestershire initiated a communication campaign, which involved offering training to organisation within their database; the training offered ensured that the organisations are better equipped at spotting and recognising signs of modern-day slavery and reporting these appropriately. The message reached over 500 voluntary and community sector organisations.
- b. In November 2020 Crimestoppers ran a 6-week modern-day slavery campaign in Leicester targeting the areas mostly affected by textile non-compliance. The campaign was supported by Leicester City Council and GLAA at the Leicester Business Festival. The campaign consisted of posters and billboards being displayed within the LE5 area, leaflets were distributed to local households together with a targeted social media campaign.

“ We are working closely with our partners to raise awareness of modern slavery and to help businesses and organisations identify the factors that may indicate that a member of their workforce is being exploited.

The garment sector remains extremely vulnerable to labour exploitation. Seasonal or temporary workers are also particularly vulnerable to exploitative practices. We work together to empower residents of Leicester to look for any suspicious signs that forced labour is happening and pass on any information to the Police.

”

Crimestoppers

Case Study 2

I moved to England from Pakistan, I'm in my 50s and never learnt English. If I worked over 16 hours per week my employer would pay me less than minimum wage. I accepted this because I thought that there isn't anyone else who would give me work. My boss eventually told me that he doesn't have work for me anymore and I became jobless.

Because I thought that I won't be able to find another job I started claiming benefits. It wasn't until I contacted Hope for Justice, they told me that there are many ways that I can find a new job, they helped me and now I am working and earning minimum wage.

- c. Unseen conducted a four-week awareness raising campaign during March 2021, this campaign specifically focussed on labour abuse in the clothing and fast fashion sector. The campaign was funded by Leicester City Council. The campaign resulted in increased calls to the Crimestoppers helpline to report issues related to labour abuse in Leicester.
- d. Leicester City Council worked with Citizen Advice's project called Fairpay to establish face-to-face engagement sessions with the community affected by textile non-compliance. The project involved the establishment of a community engagement officer for a period of six months in 2020/2021 whose role involved building trust with textile workers and supporting the wider community.
- e. Hope for Justice (H4J) established the Leicester Hub offering direct community engagement and training. H4J are now a key partner in delivering the partnerships objectives within the community. The support offered by H4J has ensured that the work started by Project Fairpay continues.

“ Allegations of modern slavery offences in Leicester's textile sector triggered Operation Tacit in the Summer of 2020. Working together the GLAA, HM Revenue and Customs, policing, Health and Safety Executive, National Crime Agency, Fire and Rescue Service and Leicester City Council have visited more than 386 factories in the city, securing warrants on premises that presented a high-risk and where business owners did not grant access.

We know that forced and compulsory labour issues are complex given victims are very often unaware they are being exploited, can be worried about their individual circumstances, and are also anxious about engaging with law enforcement. More often than not labour exploitation is not in plain sight, it is hidden, insidious and manifests itself in a number of different ways.

That's why we continue to work in partnership across Leicester highlighting the issue through awareness raising training for workers and exploring opportunities to introduce the GLAA's qualification in workers' rights to employees within the textiles sector in the city.

A new Crimestoppers reporting line has also allowed workers to report their concerns in confidence.

Frank Hanson, GLAA Head of Prevention and Partnerships

- f. The community safety (labour market) coordinator has developed training sessions for frontline council staff. A total of 10 sessions have been completed to date with more scheduled to be undertaken. The training is being delivered in conjunction with Hope for Justice and the intention is that all frontline staff within the council will receive it.
- g. BooHoo and Hope for Justice established a process for workers to report concerns. Where issues are identified both organisations work together to follow up on any concerns. This work has led to identifying issues of non-compliance and employers have been offered improvements in working conditions for the workers concerned.
- h. Leicester City Council assisted Nottingham University's Rights Lab with their research into the textile sector. The council acted as a conduit by introducing partners to the research, some of which, Hope for Justice for example, became actively involved in the research. The research is due to be published in 2022 and will inform the activities of the newly formed Leicester Garment and Textile Workers Trust.

Case Study 3

I'm an Indian male in my late 30s from the Daman region. I was working in a textile factory and was paid less than the minimum wage, I was also learning English in the evenings. I contacted Hope for Justice to seek help and to report what was happening to me at work. Hope for Justice helped me to pass the details about the factory to GLAA.

I am glad that I received help and I feel confident after learning English, I found a new job with Royal Mail.

- i. GLAA has worked with the Skills and Education Group to engage with education partners in the Leicester and Leicestershire area to raise awareness of the Level 1 Award in Workers' Rights and Labour Exploitation which has since gone live.
- j. Highfields Community Centre, TUC Midlands, fashion brands and local partners established FAB-L (Fashion-workers Advice Bureau) project. This initiative involved the recruitment and establishment of two community engagement officers who raise awareness, educate and signpost textile workers to specialist services; and share the benefits of trade union membership to protect their rights.
- k. HMRC have undertaken a range of engagement activities. They have written to more than 2,500 textiles businesses across the UK and to more than 18,000 textile workers to raise awareness of the National Minimum Wage and how to find support or make a complaint. Their officers have distributed more than 2,600 multi-lingual advice leaflets to workers during their visits to Leicester textile factories.
- l. Alongside this HMRC have worked with Hope for Justice to engage with workers at community venues and staffed a stall in Leicester City Centre with GLAA and Hope for Justice colleagues during Modern Slavery Week (W/c 18 October).

More details about engagement initiatives are included within Appendix A to this document.

“

We've made a great deal of progress over the last 12 months since our joint round table with Leicester City Council. We know what needs to be done to eradicate malpractice and worker exploitation in the garment industry. We now need to move to implementation, working in partnership with national brands and local suppliers to embed trade unionism into the garment industry in Leicester.

GMB and Unite the union are leading the way in building a union presence in the workplace. Their work in supporting workers and in building confidence of vulnerable and exploited workers is of immense importance.

What's more, once we can show that this approach is successful, we know that brands will invest more in sourcing from Leicester. So, the next 12 months is crucial. Let's get this right, end exploitation and grow an industry based on good, decent jobs.

”

Lee Barron, TUC Midlands Regional Secretary



5.3 Economic Development in the Textiles Sector — To ensure that the textile sector is fully supported to develop, including supporting the development of manufacturing skills and processes to ensure a sustainable textiles and garments sector.

Outlined below are some examples of work undertaken.

- a. Textiles remains an important local employer in Leicester — employing around 5000 people in the city alone, more than 10,000 people across the city and county. Sources: EMSI occupational data, Office for National Statistics Inter-Departmental Business Register (IDBR) 2020.

Leicester still has the second largest concentration of textile firms in the country, and the largest for garment manufacture, employing over a fifth of the UK workforce. The sector is worth over £500m to the local economy and is a priority sector for our economy*.

Many retailers are looking to source more garments from the UK, and this gives Leicester a great opportunity given the concentration and breadth of textiles manufacturing businesses in the area.

If we are to realise the potential of UK textiles manufacturing, and Leicester's central role in that, then that requires cultivation of a new generation of skilled talent. Our major achievement during 2021 has been the development and launch of the Fashion Technology Academy (Leicester). Working with leading skills provider Fashion Enter and industry partners, the two-year initiative offers apprenticeships and accredited training for people who work in, or want to work in, the textiles industry. This is a significant milestone to accelerate the resurgence of Leicester's fashion and textiles manufacturing sector.

**Source: Leicester and Leicestershire Enterprise Partnership — Textiles Manufacturing Sector Growth Plan 2015*

Fashion Technology Academy (Leicester)

Launched in November 2021, the fashion technology academy will train people in the skills they need to work in the textiles industry. Leicester City Council has invested £300,000 in the project and teamed up with leading training provider Fashion-Enter Ltd to develop the new skills centre, including funding of £100,000 administered by the Leicester and Leicestershire Enterprise Partnership (LLEP).

The academy offers apprenticeships and accredited training for Leicester textiles workers and unemployed people who want to work in the sector. Current courses are free to people who are unemployed, and apprenticeships at various levels are available to employers.

The academy is based in Stonebridge Street, at the heart of Leicester's garment industry, sharing a state-of-the-art building with renowned local clothing company Ethically Sourced Products Ltd, which has made the second floor of its premises available for the project.

Trainees have already started on some of the academy's first courses, with an event held for partners, industry professionals, fashion retailers and guests in November 2021 marking the official launch of the project.

“The opening of this academy is the result of years of hard work, and ideas that were first formulated at a ground-breaking textiles coalition event hosted by Leicester's city mayor in 2017. This project has been developed to help tackle the problems that we know exist in the garment industry locally and are determined to address — despite having no enforcement powers ourselves.

Creating a highly-skilled and specialist workforce is an important and crucial step in creating workplaces where staff are valued, leading to higher standards of workplace compliance.

”

Cllr Adam Clarke, Deputy City Mayor

“The opportunity for ethical ‘speed of response’ fashion from Leicester is enormous for retailers and e-tailers today. Fashion-Enter is delighted to be working collaboratively with partners to train a further generation of multi-skilled workers. Thank you to all involved; this is just the start!”

Jenny Holloway, Director Fashion-Enter

Other partners supporting the project include suppliers Triumph Needle and Alvanon, plus fashion e-tailer I Saw It First, which has invested £150,000 in training to be delivered by the new academy.

“I Saw It First is committed to the British textiles industry, and our latest investment in the academy reinforces our desire to strengthen the sector and improve standards.”

Greg Pateras, CEO I Saw It First

Leicester City Council's Adult Education team is also working closely with the academy to offer English courses at the venue for speakers of other languages.

Anyone who is interested in finding out more about courses at the Fashion Technology Academy (Leicester) can visit the website [fcfta.com](https://www.fcfta.com).

- b. Leicester City Council has continued to deliver a comprehensive business support programme for the textiles sector, working as part of the Business Gateway Growth Hub and with funding from the European Regional Development Fund. We have engaged with more than 200 textiles businesses, providing free impartial advice and enabling access to business grants. Over £3m of investment/ grants from the European Regional Development Fund and Regional Growth Fund has been secured by textiles businesses over recent years.

The support has included delivery of a popular rolling webinar/ events programme for textiles businesses around ethical and legal compliance, alongside general business growth support topics. For example, in November 2020 the Business Gateway Growth Hub launched a further series of webinars, bespoke consultancy support and interactive, practical workshops. These cover a range of topics prioritised by business leaders themselves, including leadership and management, digital transformation/ digital marketing, compliance with ethical, sustainable and quality standards, Brexit readiness, innovation and the identification of new market opportunities, and help to access grants, funding and investment.

Leicester and Leicestershire Enterprise Partnership (LLEP)

The fashion and textile sector continues to be of significant importance to the LLEP with activities factored in strategically through the development of an updated sector profile and prioritisation of the sector in the Economic Growth Strategy, and practically via various business support programmes of activity delivered with partners in the Business Gateway Growth Hub.

A focus on innovation:

For the fashion and textiles sector to survive and thrive in Leicester and Leicestershire, businesses need to innovate, look to new ways of working and modernise, embrace new technologies in terms of the latest equipment, the digitalisation of business processes, and support workers to develop higher level skills.

To help drive this change the textile sector is represented on the LLEP Innovation Board by two textiles SMEs, to ensure that the voice of the SME textile community is heard. This provides a focus for work to support the SME community to embrace and implement opportunities for innovation. Textile sector small and medium enterprises are represented to ensure that the challenges and opportunities faced by this important sector can be addressed to drive forward the changes needed in terms of sustainability and business growth.

Chaired by LLEP Board member Dr Nik Kotecha, representation on the Board includes Innovate UK, De Montfort, Loughborough and Leicester Universities, corporate companies include Dunelm who have a large textile manufacturing unit in Leicester, and the finance sector via Nat West and the British Business Bank.

- c. The City Council has also recently secured £500,000 from the Community Renewal Fund to deliver a new support programme for an initial cohort of Leicester textiles manufacturers, working with partners Fashion Enter and De Montfort University. This important development programme launched in early 2022 and will be a significant focus of our work to support Leicester’s textiles industry during 2022.

Community Renewal Fund

In a further boost to the industry locally, a successful bid to the UK Government’s Community Renewal Fund has secured £500,000 for Leicester City Council and partners Fashion-Enter and De Montfort University to offer co-ordinated support to textiles manufacturers and local textiles workers.

The project will be delivered during 2022 and will provide lots of practical support to participating businesses to ensure ethical compliance and best practice, support innovation and develop their workforce skills.

“ This is great news for Leicester and demonstrates our commitment to the garment sector locally, which is a vital part of our economy. We’re determined to help raise standards and promote best practice in the industry — and this funding will help us to do that, by working intensively with local businesses. ”

Cllr Adam Clarke, Deputy City Mayor

“The funding is imperative and excellent timing. It will allow us all to work with the factories on programs that will make a direct difference on ethics and efficiently. These are exciting times, and we are delighted to be working on this ground-breaking programme.”

Jenny Holloway, CEO Fashion-Enter

“The city of Leicester and DMU share a rich history in fashion and textiles, and the university is delighted to be part of this far-reaching project. We will be working closely with companies of all sizes on this plan, which has the potential to re-imagine business models and develop a more sustainable future for the industry.”

Professor Katie Normington, Vice-Chancellor
De Montfort University

The project will work with local manufacturers and textiles workers on accredited skills and training via the newly launched Fashion Technology Academy, develop links to research and innovation to drive productivity, offer support for manufacturers to adopt best practice ethical compliance procedures, and work to promote the best of Leicester manufacturing.

The funding award is part of an overall £3million package secured by Leicester City Council from the Community Renewal Fund. The UK Community Renewal Fund is a government programme which aims to support people and communities most in need across the UK, investing in skills, community and place, local business, and supporting people into employment.

During the last year the council's economic regeneration service and community safety and protection service have been:

- Working with a broad cross section of organisations, sector agencies, regulators
 - Establishing the Leicester Labour Market partnership — a catalyst for aligning the work of the range of agencies and organisations around ethical compliance and enforcement. Leicester City Council has created and funded a coordinator to drive this work forward — the first of its kind in the country
 - Working with trade union colleagues to support local workers with their employment rights.
- d. The Leicester and Leicestershire Economic Partnership (LLEP) published an updated Fashion and Textiles sector profile (October 2021). Part of a series looking at a range of different sectors, this provides a snapshot of how the textiles sector is performing in relation to economic contribution to the region, growth, businesses, skills and jobs. The report can be found on the llep.org.uk website and shows that the sector has been particularly badly hit since the start of the Covid-19 pandemic.
- e. The council continues to work with the Apparel and General Merchandise Public Private Protocol (AGM PPP) to ensure joint working on key areas. In December 2018 some of Britain's biggest fashion retailers joined forces with enforcement bodies through **The Apparel and General Merchandise Public and Private Protocol** which committed signatories to work together to raise awareness, prevent worker exploitation, protect vulnerable and exploited workers, disrupt exploitative practices and help bring criminals to justice.
- f. The GLAA, Hope for Justice and the Council's Economic Development team have undertaken training to employers and employees — these have been online and via webinars. The training sessions recorded good numbers of attendees and raised awareness of labour exploitation and MDS Issues.

Fast Forward

- g. In August 2020, not-for-profit, labour standards and improvement programme Fast Forward, launched a subscription-based Supplier Engagement Programme (SEP). Open to any supply chain business in the UK, the SEP supports suppliers to make proactive improvements in the management of ethical labour standards in their business. The Ethical Labour improvement actions, with the online guidance, webinars and monthly newsletters keep them up-to-date on industry developments and changes to law. Suppliers are given an active voice in the programme through Supplier Forums, where they can share current challenges and best practice, and feedback on the development priorities for the programme. Fast Forward aims to grow subscribers to 250 by the end of 2022.
- h. Throughout 2021 Fast Forward partnered with the Leicester Business Gateway Growth Hub and Leicester City Council to deliver a series of nine Ethical Compliance workshops and supporting topic-focussed webinars.

“We believe that the UK has the potential to build a world-leading, innovative, ethical fashion and homewares manufacturing industry, delivering decent and highly skilled creative jobs. To accomplish this all stakeholders, have a role to play.”

**Hannah Newcomb, Managing Director
Fast Forward**

- i. Since Autumn 2020, nearly 20 new brands and retailers with UK production have joined the programme, committing to driving ethical practices in their UK supply chains. This critical mass presents an opportunity for the programme to help drive industry-wide improvements. A Programme Integrity Manager role was introduced in September to support brands more actively on their responsible sourcing, purchasing and remediation strategies.
- j. Strengthening worker outreach, in March 2021 Fast Forward partnered with Just Good Work, a free, interactive mobile app giving jobseekers and workers critical information and advice on recruitment and employment. Just Good Work is available in six languages including English, Albanian, Bulgarian, Gujarati, Polish and Romanian. The Fast Forward audit now requires businesses to display the Just Good Work poster.

Apparel and General Merchandise Public Private Protocol

- k. In October 2020, recognising the need to act together to remedy the anecdotal denial of rights and exploitation of workers in unethical UK fast fashion manufacture, a wide group of stakeholders came together to work collaboratively within The Apparel and General Merchandise Public and Private Protocol (AGM PPP).
- l. There has not to date been a coordinated approach that brings together retailers, brands, manufacturers, local government, enforcement bodies, trade associations, trade unions, NGOs and others to “Work together to improve employment and working conditions and eradicate slavery and exploitation in the Apparel and General Merchandise supply chain”.

The AGM PPP objectives are to:

- Develop an integrated approach to tackle the underlying problems and promote good practice
- Enhance co-operation and collaboration between stakeholders
- Identify and work collaboratively on jointly agreed policy and strategic workstreams
- Develop a formal binding ‘Joint Responsibility’ agreement with accountable commitments signed by stakeholders committing to the AGM PPP’s joint mission.

All AGM PPP stakeholders actively participated in at least one joint workstream as follows:

1. Worker and community voice, grievance mechanisms, worker support, protection and remediation
2. Intervention mechanisms — audit, intelligence sharing and enforcement
3. Business accountability — Transparency pledge and responsible purchasing practices
4. Regulation, legislation and political engagement.

Work is ongoing and a Joint Responsibility Initiative Agreement is anticipated to be agreed in the near future.



6.0 Forward Planning

6.1 Our partnership commitments planned for 2022/2023, aligned to our objectives include:

- a. To understand current and emerging threats within the garment sector supported by appropriate analysis and evidence, delivered through an Action Plan.
- b. To identify cross-cutting themes and issues to ensure on-going collaborative approach.
- c. To understand local capability, capacity, and resources available to respond to these threats.
- d. To seek out and identify funding streams and make use of available resources to establish the best way forward for ensuring compliance and encouraging good practice.
- e. To identify and share regional and national good practice.
- f. To support partners in addressing the issues identified.
- g. To promote public confidence and reporting.
- h. To utilise available evidence, and the feedback from partners on the review of the Leicester Labour Market Partnership in order to develop a strategy that provides a long-term plan for tackling labour market compliance issues in the textile sector and opportunities for economic growth.

7.0 Appendices

Appendix A — Engagement Activities November 2020–March 2022

Engagement with communities and partners to ensure that communities and employees within the sector are fully aware of their rights and how to seek support should they need it.

Partners participating in engagement initiatives:

- ✓ Leicester City Council
- ✓ Citizens Advice
- ✓ Crimestoppers
- ✓ Gangmasters and Labour Abuse Authority (GLAA)
- ✓ HMRC National Minimum Wage
- ✓ Hope For Justice
- ✓ Unseen
- ✓ Voluntary Action Leicester

Leicester Labour Market Partnership Activity November 2020–March 2022

DATE	PARTICIPATING PARTNERS	ACTIVITY	DURATION
Ongoing throughout the period.	✓ Leicester City Council	Leicester City Council has hosted since September 2019 quarterly Leicester Labour Market Strategic Partnership meetings. The meetings offer a forum for discussion around emerging issues and join-up at a senior level ensuring improved working between key agencies.	3 monthly
Ongoing throughout the period.	✓ Enforcement agencies	Investigators across the labour market enforcement bodies have constantly been on the ground in Leicester and working with communities in the city for a number of years, meaning they have a well-established knowledge of what is and isn't occurring in its textile industry. Through Operation TACIT enforcement bodies have undertaken over 380 visits to businesses, providing advice and support to employers to get it right and educating workers to know their rights. Where enforcement bodies have identified non-compliance, they have taken steps to correct this.	Ongoing

DATE	PARTICIPATING PARTNERS	ACTIVITY	DURATION
Ongoing throughout the period.	✓ Citizens Advice	Commencing from September 2020 Leicester City Council worked with a Citizens Advice project called Fairpay to establish face-to-face engagement sessions with those who may be affected by textile non-compliance. The project involved the establishment of a community engagement officer for the period of six months in 2020/2021 whose role involved building trust with textile workers and the wider community.	6 months
Ongoing throughout the period.	✓ GLAA ✓ Hope for Justice	GLAA, Hope for Justice and the Council's Economic Development team have undertaken training to employers and employees — these have been online and via webinars. The training sessions recorded good numbers of attendees and raised awareness of labour exploitation and modern-day slavery issues.	Ongoing
Ongoing throughout the period.	✓ Hope for Justice	Hope for Justice's work has involved accommodating the individual needs of garment workers, respecting their distinct idea of justice and meeting their immediate needs directly or through signposting them to appropriate organisations, such as English for Speakers of Other Languages (ESOL), Advisory, Conciliation and Arbitration Service (ACAS), Citizens Advice, food banks, garment training.	Ongoing
Ongoing throughout the period.	✓ Hope for Justice	Hope for Justice is working in collaboration with fashion brands and facilitating visits to garment factories with brands to raise awareness, educating and empowering garment workers in the factories about their employment rights.	Ongoing
Ongoing throughout the period.	✓ Hope for Justice	Hope for Justice takes part in fortnightly meetings with fashion brands to enable the sharing of information pertaining to instances of both good and bad practise in the industry, as well as opening referral pathways into ethical and sustainable employment.	Ongoing
Ongoing throughout the period.	✓ GLAA	The GLAA worked with the Skills and Education Group to engage with education partners in the Leicester/Leicestershire area to raise awareness of the Level 1 Award in Workers' Rights and Labour Exploitation. There are few local education providers that are accredited to deliver this training. The course is being delivered locally by Fashion Enter via the Fashion Technology Academy, with funding from the Community Renewal Fund.	Ongoing

DATE	PARTICIPATING PARTNERS	ACTIVITY	DURATION
November 2020	<ul style="list-style-type: none"> ✓ Crimestoppers ✓ Leicester City Council 	<p>A 6-week modern-day slavery campaign in Leicester targeting the areas mostly affected by textile non-compliance. The campaign was supported by Leicester City Council and the Gangmasters and Labour Abuse Authority (GLAA) at the Leicester Business Festival. The campaign consisted of posters and billboards being displayed within the LE5 area, and leaflets were distributed to local households. There was also a targeted social media campaign.</p>	6 weeks
January 2021	<ul style="list-style-type: none"> ✓ All 	<p>Creation of regular three-weekly meetings with engagement partners to discuss ongoing and future engagement initiatives which informed the work highlighted in this report.</p>	Ongoing
March 2021	<ul style="list-style-type: none"> ✓ All 	<p>Voluntary Action Leicestershire initiated a communication campaign, which involved offering training to organisations within their database. The training offered ensured that the organisations are better equipped at spotting and recognising signs of modern-day slavery and reporting these appropriately. The message reached over 500 voluntary and community sector organisations.</p>	4 weeks; recirculated to members on different occasions
March 2021	<ul style="list-style-type: none"> ✓ Unseen ✓ Leicester City Council 	<p>The charity Unseen conducted a four-week awareness raising campaign during March 2021. This campaign specifically focussed on labour abuse in the clothing and fast fashion sector. The campaign was funded by Leicester City Council. The campaign resulted in increased calls to the helpline to report issues related to labour abuse in Leicester.</p>	4 weeks
April 2021	<ul style="list-style-type: none"> ✓ Hope for Justice 	<p>Hope for Justice (H4J) established the Leicester Hub offering direct community engagement and training. H4J are now a key partner in delivering the partnerships objectives within the community. The support offered by H4J has ensured that the work started by Project Fairpay continues.</p>	Ongoing
April 2021	<ul style="list-style-type: none"> ✓ Leicester City Council 	<p>The community safety (labour market) coordinator has established links with the foodbank facilities at Wesley Hall, where a number of those individuals affected by changes within the textile sector sought assistance. The organisers of activities at the Hall provided a base for a lot of community engagement initiatives. As part of this work, Hope for Justice held a community training event attended by local community.</p>	Ongoing

DATE	PARTICIPATING PARTNERS	ACTIVITY	DURATION
Summer 2021	<ul style="list-style-type: none"> ✓ Leicester City Council ✓ Hope for Justice 	Leicester City Council and Hope for Justice assisted Boohoo with the recruitment process for staff to work in their new centre of excellence; this assisted Boohoo to attract from within the local community.	One off arrangement
July 2021	<ul style="list-style-type: none"> ✓ Leicester City Council ✓ Hope for Justice 	The community safety (labour market) coordinator has developed training events for all frontline council staff. A number of sessions have been completed to date with more scheduled to be undertaken. The training is being delivered by Hope for Justice and the intention is that all frontline staff within the council will receive it.	Ongoing
September 2021	<ul style="list-style-type: none"> ✓ Leicester City Council ✓ Hope for Justice 	The community safety (labour market) coordinator has delivered presentations in collaboration with Hope for Justice to East Midlands Money Advice Group. This training has received positive feedback from attendees, and as a result there is scope to deliver more training to other regional debt advisors.	One off arrangement
October 2021	<ul style="list-style-type: none"> ✓ Leicester City Council ✓ Hope for Justice ✓ GLAA ✓ HMRC 	To raise awareness of modern-day slavery to the public, during the Modern Slavery Intensification Week, a stall was set up in Leicester city centre. This activity was supported by colleagues from Hope for Justice, GLAA, Her Majesty's Revenue and Customs (HMRC) and Leicester City Council. Officers spoke to passing members of the public and handed out leaflets to raise awareness.	One day during Modern Slavery Intensification Week
October 2021	<ul style="list-style-type: none"> ✓ Hope for Justice 	Introduction of garment production projects, for the city's garment factories to support the positive image and positive media attention, such as Dorcas Dress, an enterprise that supports sustainable employment in the poorest communities across the world. The project has been facilitated in the city's garment factory. This factory is producing 150 dresses without buttons and zip, fitted by belts only. The fabric and dresses are manufactured in Leicester's garment factory, promoted and marketed by fashion and design students of DMU Leicester and finally, the product was displayed in John Lewis Leicester in April 2022. Media promotion will support a more positive image of Leicester's garment production.	Ongoing

DATE	PARTICIPATING PARTNERS	ACTIVITY	DURATION
Autumn 2021	<ul style="list-style-type: none"> ✓ Leicester City Council ✓ Hope for Justice 	<p>Leicester City Council assisted Nottingham University’s Rights Lab with their research into the textile sector. LCC acted as a conduit by introducing partners to the research. Some partners, such as Hope for Justice are actively working with the researchers. The research is due to be published in 2022 and will inform the activities of the Boohoo Trust.</p>	Ongoing
Autumn 2021	<ul style="list-style-type: none"> ✓ TUC 	<p>TUC introduced FAB-L (Fashion Workers Advice Bureau), working in collaboration with fashion brands and local initiative. Two community engagement officers were recruited to work within the Leicester garment industry to encourage and educate workers of the benefits of trade unions to protect their rights.</p> <p>FAB-L will guarantee access for unions to recruit, to undertake Health and Safety inspections and to raise individual and collective issues with factory management. They leverage the purchasing power of brands (in the absence of a unionised workforce) to enable worker representation when necessary.</p>	Ongoing
December 2021	<ul style="list-style-type: none"> ✓ Leicester City Council ✓ Hope for Justice 	<p>Through partnership links with GLAA the community safety (labour market) coordinator has established relationship with WEA (an adult education provider) offering a wide range of learning courses. Together with Hope for Justice, WEA was introduced to a local garment producer who was keen to offer basic English learning to his non-English speaking workforce. A short pilot is taking place in 2022.</p>	Ongoing

Appendix B — February 2022: Sir Brian Leveson, Boohoo Report — Agenda for Change programme

Extract from the Report

Leicester Labour Market Partnership

5. It is clear that Leicester has a long history of garment manufacture with companies that included the largest knitwear producer and the producer of some 18 million garments for British and allied troops in the First World War. Since then, these larger manufacturers have moved out of the city leaving new, smaller, textile businesses in their place with the development of fast fashion and the consequent concern about exploitation in the marketplace. These concerns were highlighted in Human Rights and Business 2017, a report of the Parliamentary Joint Committee on Human Rights, followed up by the Environmental Audit Committee of the House of Commons Report Fixing Fashion: Clothing Consumption and Sustainability published in February 2019. As the Levitt Review expressed it:

“The problems in Leicester are complex and of long-standing.”

6. Leicester City Council (‘the Council’) does not have enforcement powers over working conditions or pay. These are vested in the Health and Safety Executive, the Employment Standards Agency Standards Inspectorate, the Gangmasters and Labour Abuse Authority, Immigration Enforcement, Her Majesty’s Revenue and Customs and, ultimately, in relation to modern-day slavery the police and the National Crime Agency. It has nevertheless been proactive in this area. Thus, in October 2019, The Leicester Labour Market Partnership was formed, led by the Council but including many of those with enforcement powers. Its overall objectives are:
- a. To promote and encourage compliance across the textile sector operating in Leicester by addressing the issues around labour abuse, exploitation and modern-day slavery.
 - b. To ensure that communities and employees within the sector are fully aware of their rights and how to seek support should they need it.
 - c. To ensure that the textile sector is fully supported to develop, including supporting the development of manufacturing skills and processes to ensure a sustainable textiles and garment sector.
7. At the end of 2019 and into early 2020, the Council recruited a Community Safety (Labour Market) Officer who started work in March and following the publicity in mid-2020, Hope for Justice and Slave Free Alliance (NGOs working in the field) joined the Partnership which, by then, had developed an Action Plan modelled on:
- a. **Prevent:** to support local businesses and employees to report issues; prevent and improve; ensure that information, prevention and enforcement activities are leading to proactive action and positive change.
 - b. **Protect:** to support the sector, ensuring the development of thriving and sustainable businesses and employment opportunities.
 - c. **Prepare:** to test through an intelligence led approach (understanding threat, risk and harm) the perception that there are a number of Leicester businesses in the supply chain for the retail sector who act outside the law, where they exploit workers and do not pay their legal dues.
 - d. **Pursue:** where multiple non-compliance is identified to undertake joint working between state enforcement bodies to seek to tackle this.
8. Later in 2020, the Deputy Mayor (Councillor Adam Clarke) conducted discussions with senior representatives of retailers (including boohoo), the British Retail Consortium, Alliance HR (working with retailers on Fast Forward ethical auditing), Labour Behind the Label (a campaign group for garment workers worldwide), Fashion Enter (a specialist not for profit social enterprise provider of accredited qualifications in fashion and textiles). The Council convene a summit with the TUC and hold meetings with Leicester Primary Partnership regarding schools and their role in understanding and acting upon issues in the textile sector.

9. In October, Citizens Advice Leicestershire recruited a Community Engagement Officer and the following month there was a Crimestoppers Event in relation to modern-day slavery supported both by the Police and Crime Commissioner, Lord Willy Bach and Councillor Clarke. This has been followed throughout the last twelve months by continuing to take on a lead role in community engagement and continuing activity to support the need to investigate and tackle exploitation by working with the GLAA, HMRC, the Health and Safety Executive, the National Crime Agency and the Leicestershire Police under the umbrella of Operation Tacit.
 10. Over the same period, the Council has engaged with Voluntary Action, Leicestershire, the charity Unseen (which resulted in increased call to the helpline), Wesley Hall, a Citizen's Advice Project (Fairpay), Highfields Community Centre with the TUC and others (establishing a Fashion Workers Advice Bureau (FAB-L) and, in particular, Hope for Justice, with which it has worked to undertake training events for frontline Council staff, to improve systems for reporting concerns, to raise awareness of modern-day slavery, support garment production products and, most important, to provide presentations on money and debt. A pilot is also due to commence which will provide a range of learning courses including (for one manufacturer) the teaching of English to its non-English speaking workforce. The Council has also assisted Nottingham University's Rights Lab which has been undertaking research for boohoo's Garment and Textile Workers Trust.
 11. Of particular importance is the Council's development of a comprehensive business support programme for the textile sector working with funding from the European Regional Development Fund engaging with more than 200 textile businesses by providing free impartial advice and enabling access to business grants delivering an events programme for textile businesses around ethical and legal compliance. In that regard, the textile sector is represented on the Innovation Board of the Leicester and Leicestershire Enterprise Partnership thereby ensuring that the challenges and opportunities faced by this sector can be addressed.
 12. Furthermore, in November 2021, the Council secured substantial funding from the UK's Community Renewal Fund and is working with leading skills delivery provider, Fashion-Enter, and De Montfort University to offer co-ordinated support to textiles manufacturers and workers. It has opened the Leicester Fashion Technology Academy which offers apprenticeships and accredited training for those who work in, or aspire to work in, the textiles industry; trainees are learning garment making skills and, in addition, about workplace rights and responsibilities. It has been supported by private sector funding and a substantial grant from the Community Renewal Fund to deliver a new support programme. This also involves working with Fashion Enter and de Montfort University.
 13. I have identified in the Report the extent to which boohoo also is offering skills training to those employed within its supply chain with the aspiration that many will obtain NVQ as a result. Any help that individuals can receive to improve their understanding of their rights, their skills. Similarly, assistance given to those who run manufacturing businesses so that they better understand, at a fundamental level, what the law requires and the ways in which they can demonstrate both legal and ethical compliance is very worthwhile, and all that Leicester City Council is doing in this area is to be applauded. The extra link, however, is the mechanism of allowing those businesses to be able to provide sufficient evidence that retailers (whether or not they are presently working in Leicester) are prepared to bring them into their own supply chain with confidence that garments that they manufacture will be produced both lawfully and ethically. That requires dealing with the challenge of obtaining a recognised and acceptable audit of the way in which they conduct business.
- It is believed that Leicester City Council as well as all partners involved in efforts to tackle and transform the garment sector have showed their commitment and drive to do so long term. We manifested how well organised partnership can secure a commitment from wide range of partners to successfully deliver multilevel objective. This has been achieved in Leicester and it is one-of-a-kind collaborations. We believe that these efforts are here to stay, and we look forward to seeing how they will adapt to the changing landscape of raising numbers of compliant businesses and community engagement being able to reach the communities and support them in seeking help, education, and improvements to their lives.

