



HOUSES OF PARLIAMENT

Joint Committee on Draft Modern Slavery Bill

Oral evidence: [Draft Modern Slavery Bill](#), HC [1019], Thursday
6 February 2014

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Members present: Mr Frank Field (Chairman), Baroness Butler-Sloss, The Lord Bishop of Derby, Baroness Hanham, Baroness Kennedy of Cradley, Lord McColl of Dulwich, Fiona Mactaggart, Mrs Caroline Spelman, Sir Andrew Stunell and Lord Warner

Questions [400-433]

Witnesses: **Andrew Coulcher**, Director of Business Solutions, Chartered Institute of Purchasing and Supply, and **Kevin Green**, Chief Executive, Recruitment and Employment Confederation, examined.

Chairman: Welcome. Would you please identify yourselves for the record?

Andrew Coulcher: I am Andrew Coulcher, director of business solutions at the Chartered Institute of Purchasing and Supply.

Kevin Green: I am Kevin Green, chief executive of the Recruitment and Employment Confederation.

Q400 Baroness Hanham: If you had the opportunity of recommending two clauses on supply chains for inclusion in the Bill, what would you include?

Kevin Green: We would be supportive of some kind of public reporting requirement for end users. One of the issues we see clearly in terms of supply chain management at the moment in relation to our members is that it is predominantly driven by cost. We think that getting the end user—the end hirer—to take responsibility for the supply chain would be very effective in tackling slavery. Some kind of public reporting requirement would be good. Secondly—

Q401 Baroness Hanham: At what level? The supply chain can start with the corporation worth £100 million or whatever, or be the little chap at the bottom. Where would it be?

Kevin Green: I think you have to start at the top where the economic power or commissioning activity takes place, whether it be a big supermarket or a big organisation, and there may be a number of bodies along the supply chain that have a role within it. We think that, by asking those public corporations to make a public statement and declare how they are addressing this issue, they would more proactively manage their supply chain to make sure there was adherence to best practice.

Andrew Coulcher: We agree that disclosure is one of the requirements of any legislation, but there is also demonstration of how these organisations are taking the awareness, policy requirements and due diligence requirements further down the supply chain. There tends to be quite a lot of activity at what we would call tier one—the direct supplier relationship. What we do not see so much of is how that is being cascaded further down the supply chain where a lot of the vulnerability sits.

Q402 Baroness Hanham: I would agree with that. Do you think there is any room here for a voluntary code of practice, in addition to legislation or instead of it?

Kevin Green: There is already quite good practice. Some of the big supermarkets are doing a lot around good reporting and starting to look at their supply chains in this activity. Codes of practice are always good because we are trying, as best we can, to promote the right way of doing things, but some kind of reporting within annual reports, or something like that, would strengthen that and make it much more critically important to the board of large organisations.

Q403 Baroness Hanham: Annual report to whom?

Kevin Green: The annual report; if you are a listed organisation, the annual report.

Andrew Coulcher: There are definitely opportunities to extend and encourage a lot of the voluntary work that is taking place at the moment, perhaps as a way of pre-empting some of the legislation. Some good work is going on, but from the feedback we have from our members it is not particularly well joined up. It needs support not just from the UK Government but from Governments in other countries where this kind of modern slavery is rife. We need help from people responsible for border controls, from NGOs and industry. It needs to be a collaborative effort. Our view is that a lot of that effort should be put in to pre-empt or properly to align with any legislation that comes along in future.

Q404 Baroness Hanham: Can I touch on one related point? As regards recruitment in particular, one of the bottom areas of this is the recruitment of people who are either recruited by consent but then end up in a situation that they never anticipated they would be in, or recruited under false intent. Where in the recruitment agencies is there any ability to control what they are doing in terms of who they recruit and what you require of them?

Kevin Green: In terms of our members—legitimate recruitment businesses—we have codes of conduct. We already have a code of professional best practice. We carry out audits on our members; they have to go through compliance tests, so there is already quite a lot of good practice in relation to the recruitment sector. But one of the things we have clearly seen, certainly over the last few years, is that most of this activity is led by criminal gangs. They have been quite effective in infiltrating legitimate recruitment businesses. There are times when somebody comes into a recruitment agency, they have a legitimate right to work, all the paperwork is checked out and the recruitment agency puts them to work, only to find out at a later date that someone has given bank details of a gangmaster, or whatever. They are led to a cash machine on a Friday and the cash is taken out. They have to pay a huge amount of money. We try to provide good practice to our members and tell them how to spot this and what they should be doing in these circumstances, but there is an issue about who they report to if they flag up issues. Our members actively want to tackle this issue, because for them not only is it hugely concerning in terms of the individual being exploited in this way; it is their reputation. They are obviously operating in a local community and they want to do the right thing, and they do not want to end up with their workers being exploited in this way.

We are trying to do as much as we can, but there clearly is a role for more ownership of the supply chain by the end user, by which I mean the legitimate businesses I have just talked about. At the moment they

are often undercut by rogue agencies that have not put in good compliance and are not members of trade associations and are without codes of conduct. At the moment, there is very little or no regulation for them. We are saying that, if you make the end user accountable and they audit their supply chain, they will be making sure they only work with legitimate, robust and compliant agencies, which is the right thing for the whole of the supply chain, hence why we need to get the end user to take ownership of this.

Baroness Hanham: That is very helpful.

Q405 Chairman: Supposing the Bill when it becomes an Act says that recruiting slaves into jobs is a charge, what effect would that have on your members?

Kevin Green: At the moment, there will be situations where criminal gangs have infiltrated legitimate recruitment businesses. Most legitimate businesses are already taking steps to try to avoid this, but it does happen. Even with the licensing regime covered by the GLA, if you look at some of the people recently prosecuted under the Endeavour operation, most of them had a licence, and legitimate recruitment businesses were involved. I am not sure it would make a huge difference; I am not sure it would fundamentally change the activity that good compliant businesses are doing on the ground.

Q406 Baroness Butler-Sloss: I assume there are some recruitment agencies who do not comply with the sort of high standards that your agencies have. Would it not be a good idea to include recruitment, which might catch the people who may be undercutting your people?

Kevin Green: Yes, and the way to do that is to make the end user accountable. If you are a large supermarket—a Sainsbury's or a Tesco—and you are managing people down the supply chain, and you have the onus to report what you are doing to drive out slavery or human trafficking, you then put in processes to make sure you are only using legitimate suppliers and they are compliant. That is the way to drive out anybody who is operating from a rogue perspective.

Q407 Fiona Mactaggart: It is interesting listening to you. I think you are right, Mr Green, that the key issue here is the end user, because they are the powerful person in the supply chain in effect. They decide how long their supply chain is, what price to charge the customer and so on. It has been suggested to us that there are two approaches. One is reporting under human rights reporting requirements. I think both of you have said that that would be quite a good way of dealing with this. The

other is the kind of due diligence that exists in the Bribery Act to track through how it works. Do we need both? Is one better than the other? I would be interested in your response to those approaches.

Andrew Coulcher: The provisions in the Bribery Act that require organisations to demonstrate they have put in place reasonable measures to control the risk of bribery throughout their organisations, and extending beyond UK borders for example, are a good way to go, if we are going to legislate in this area. From our point of view, where we are dealing with large manufacturing and distribution companies, it is not just about what happens within UK borders; it is how we get visibility and accountability for what happens further down the supply chain. To paraphrase what you have just said, quite often they have a role to play in deciding how long that supply chain is, but quite often it is a bit of a blind spot for organisations. They think their supply chain may be one or two layers deep; quite honestly, it could be several layers deep. Giving them the tools, the awareness and understanding of how to deal with those extended supply chain issues is a major opportunity for us to collaborate and put those measures in place.

Q408 Fiona Mactaggart: The governance code says that companies have to comply or explain, as it were. Do you think that would be a useful system to give us supply chain assurances?

Andrew Coulcher: I do, because punitive measures may end up driving some of this further underground than it is at the moment.

Q409 Fiona Mactaggart: If the punishment is directed at the big company at the end, why would it drive it underground?

Andrew Coulcher: We would advocate giving organisations the confidence not to turn a blind eye to what is going on in the supply chain but to own up to it and account for it, and work collaboratively with the organisations who do not have the best practices in place to put those best practices in place. Our view is encourage, provide the tools, provide the awareness, and confront the issue where it is occurring.

Q410 Fiona Mactaggart: I am worried by your suggestion that people might turn a blind eye. One of the things we have heard in some of these auditing processes and so on is that it can quite easily become a whitewash process, so people do it in order to look good. I am not certain, if we create a system which could look like that, that we are not going to enable that to continue to happen. How can we stop that happening?

Kevin Green: Isn't some of this about empowering people within the supply chain to report? One of the things you must do to encourage

that is make sure there are protections in terms of whistleblowing—people who spot things they are really unsure about, perhaps bank details with the same bank information for workers. You want agencies to feel confident. If there is any punitive thing, people may think, “I’m not going to take the risk of reporting this.” We want to create an environment where anybody along the supply chain can flag up issues where they think there may be something going on, so that law enforcement agencies can investigate and take appropriate action. We want to encourage people by making it as transparent as possible, promoting best practice, getting people to report and feeling confident they can flag up issues to the relevant bodies, who can then investigate, because that is the key to this. We must not forget that this is not about legitimate businesses; it is about criminal gangs who are incredibly resourceful at getting round activities. We really want to get everyone participating in the system and the process, and make sure they flag up the issues to the relevant bodies.

Fiona Mactaggart: I agree with you, but I am worried. For example, in the national health service, which is a state-run organisation, we have very clear protection for whistleblowers, yet we know that people are bullied out of whistleblowing. How can we make it work in companies?

Chairman: Is that a question to all of us, or to our guests?

Q411 Baroness Butler-Sloss: Perhaps I may take that point a little further. The Government’s strategy report in 2011 said that business was aware of its social obligation and duty to report. Do you know of businesses reporting instances of trafficking? Does it actually go on?

Kevin Green: I certainly know that our members have been actively engaged in flagging up issues and concerns to either the GLA or law enforcement bodies, so it does happen. The issue for us is that we need it to happen more actively with more members. For us, it is about how you heighten people’s awareness. What should they be looking for? What can they spot, and how can they make sure they are reporting it to the relevant bodies? Andrew’s point at the beginning was very clear. At the moment, the whole enforcement regime is incredibly fragmented and it is very difficult for a business to know who they should be talking to. If I have a cast-iron case, clearly I go to the police, but if I just have a concern or I am not quite sure about something—

Q412 Baroness Butler-Sloss: The GLA man, Paul Broadbent, was telling us in evidence on Tuesday that he is offering advice to various organisations, including business, and the suggestion is that the reporting should be done to the GLA. Is that something you could push through your various organisations?

Kevin Green: We sit on the board of the GLA and we are very supportive as an organisation. We think it does incredibly good work on intelligence-gathering, sharing best practice, training and investigating, so we would be very supportive of its remit being extended in relation to that. However, we would not be supportive of an extension of the licensing regime, because we do not believe that it addresses this issue.

Q413 Baroness Butler-Sloss: Could I ask a slightly different question but on the same subject? The Joseph Rowntree Foundation report on supply chains raised the issue of confidentiality agreements, saying that these were a major discouragement to people whistleblowing. Have you any experience of that?

Kevin Green: In relation to this activity? I have certainly not come across that. I know there were issues in the health service about whistleblowing and confidentiality agreements having an impact. I have not come across them in this instance, but I think the same thing applies; you want to encourage whistleblowing and people having the right to identify where they believe there to be criminal activity.

Q414 Baroness Butler-Sloss: Have you seen any evidence of people being stopped from doing this by confidentiality agreements?

Andrew Coulcher: No, we have not, but I think there is a nervousness among people who are contracted under terms like that.

Q415 Chairman: It is not in your contract.

Andrew Coulcher: As far as I know, it is not in my contract. It is a difficult thing for somebody who is bound by conditions like that to know where to go. The advice we are giving to our members—we do not offer a whistleblowing service but we have considered doing that—is to follow guidance that is already out there from the British Standards Institute or from a professional body who might be representing that industry, for example. Again, a lot of this is about awareness; it is providing practical guidance to individuals and organisations about how to handle these issues in the supply chain.

Q416 The Lord Bishop of Derby: Could I go back a little before I ask my main question? Kevin, you were very clear about the importance of economic power and big business using that leverage, but you did mention that there are rogue recruitment agencies. I suspect that many of them might service smaller and medium enterprises. Is there any way we can get at the smaller-scale operation of poor quality in recruitment practice?

Kevin Green: It depends on how we define “rogue agencies.” There are people who operate on the edge of legality in all marketplaces. If we are talking about those, it is not about compliance and good practice; it has to be about enforcement activity. That is why it is absolutely critical that you make the end user, even if it is a small company, accountable for the suppliers they use. They need to make sure they have checks in place, because they are actually the end users. Let’s not forget that the commercial driver for compliance is always the end user; it has to be the end user. If you think about some of the instances in food and agriculture, at the moment many of our members are working at a 3% to 5% margin. If you think about supplying a worker on minimum wage, the agency is making £12 a week. There is a lot of activity involved in putting a worker into an employer at that level. At the moment, you have to recognise that we are in a zero sum game where the supply chains are being squeezed and squeezed for cost to be taken out—driven by us as consumers, I hasten to add—but that means there are suppliers under huge pressure. If you give the end user responsibility for making sure that good practice and compliance are in place, you have something to counteract the commercial driver in these relationships.

Q417 The Lord Bishop of Derby: That’s great. That means the end user includes small and medium-size businesses.

Kevin Green: Yes, it does.

Q418 The Lord Bishop of Derby: That is very important for us. Can I push you on this? Could you give examples of good practice in companies that are trying to deal with the slavery issue, and might they have any implications for how we try to frame legislation? Can you think of some good practice that you have come across?

Kevin Green: Absolutely. Many of our organisations have gone through identifying what risk would look like—if a worker comes in and displays these types of characteristics—and they have trained their branch managers and consultants across the country, making sure that they spot these situations, and that they then know what to do. There are two things: first, spotting what you think looks like dubious practice; and, secondly, who do you report it to internally and who do you report it to externally? Many of our members have defined that and articulated it, trained all their staff and are using it as standard practice within their organisations. Paul and the GLA will be well aware of some of those. I think you also heard from David Camp from the ALP over the last couple of days. He has a campaign that we are very supportive of, which again is about making sure end users and recruiters are absolutely explicit about what this looks like, and know how to report it.

Andrew Coulcher: Outside the context of the recruitment industry, one of the best case studies we have looked at recently is IKEA, who had some very public issues with their supply chain a few years ago. They have put in place a very robust policy which they call IWAY. Every employee in the organisation is trained on the new policy; all of their tier one suppliers are also trained in that policy, and the policy is integrated into their supply contracts. They have now taken that down to their tier one suppliers and have done a “train the trainer.” They have enforced the contract through their tier one suppliers, so it is now going down to tier two and tier three. They have also invested in a very large-scale audit organisation. They have a very robust global process of site audits looking for evidence-based proof that these good practices are being put in place. It is not a tick-box exercise; it is, “Show me the evidence; let me talk to the people.” That is one of the best industrial-scale programmes we have seen.

Q419 The Lord Bishop of Derby: So there is something about training, benchmarking and how you push it through the different levels, and in a way helping people to identify risk and seeing what it looks like?

Andrew Coulter: Yes.

Q420 The Lord Bishop of Derby: They are really both training issues that could be required.

Kevin Green: There is also the reporting issue. Where do you take it? Who do you talk to?

Q421 Mrs Spelman: We have mentioned the GLA. I think the hallmark of their success is their risk-led, intelligence-based approach. It cannot do everything all of the time, so it is really focused. Is there any evidence of companies following that same risk-led, intelligence-based approach to auditing their own supply chains?

Andrew Coulcher: We have seen some evidence of that in the oil and gas industry. They have gone about this in a very collaborative way. They have each signed up to working with a single database of suppliers. They look at where the risk is likely to occur in the supply chain. They might look at health and safety risk, for example, and segment the supply base and go and do site audits of where those risks are more likely to occur. Because it is done on a collaborative basis, it means that each of the oil companies or refining companies does not have to go to the same supplier and do the same thing. It is highly collaborative; it is risk-led, highly segmented and it is an industry-wide approach to resolving the problem.

Q422 Mrs Spelman: Oil and gas is outside the remit of the GLA anyway.

Andrew Coulcher: Absolutely.

Q423 Mrs Spelman: If I can put it this way, we got a slight sense that some businesses are relying on the GLA to do this risk-led, intelligence-based exercise, and it led us to wonder whether you think there might be an appetite for businesses to pay for a service that the GLA has demonstrated it is good at doing. What do you think about that?

Kevin Green: I think it should be encouraged. We think the GLA are doing some incredibly good work in this space. There are employers who are already adopting the approach Andrew just talked about. We ourselves do a risk-based approach to all our members. We audit them and make them do a self-assessment every year, and then we identify where we think there are issues in terms of our membership, and go out and audit them and go through all their processes and systems. Anything which creates that risk-based approach has to be right.

In terms of your idea about the GLA providing that service, I see no problem with that. The issue is what drives the large employer to want to do it in the first place. That takes you back to the transparency, the reporting and the legislative stuff. If you put that thing in place first, you then have to think, "How are we going to do this? Are we going to do it ourselves, or do we employ some experts to help us do this?" I think that would lead to the right outcome.

Q424 Mrs Spelman: That is an interesting reply. If we are moving down the direction of the companies taking it on properly, like the oil and gas sector in the example you gave, how useful or otherwise are risk indices, such as the global slavery risk index produced by Walk Free? What do you think about the plans for a corporate risk index? Are those useful to companies in looking at where they are operating, and starting out on this? What tools do they use for a risk-led approach?

Kevin Green: If the legislation frames what the reporting should be and that it should be risk-led, to a large extent you may want to create a marketplace where there is a range of options for businesses to look at what is the most appropriate tool for their supply chain. I do not think you want to be too prescriptive.

Andrew Coulcher: There is an appetite out there for organisations to be led by best practice, whether that is the publication of indices or contracting for services to help develop a risk-led management approach. There is a definite appetite for it, because there is not a lot of recognised good practice out there at the moment. I do not think people are averse to buying in services or increasing their costs in this

space, providing it can be demonstrated as best practice and it is not duplicated across the industry.

Kevin Green: One of the important things for the GLA would be how we fund its activity if we want it to do research and to co-ordinate activity across greater areas. What I do not want to see is a licensing regime that does not work, so in reality you are putting the onus on legitimate businesses to fund the enforcement activity which the state clearly should be doing.

Mrs Spelman: Thank you very much.

Q425 Chairman: Given all the wonderful activity that your members are doing, why is there so much slavery out there?

Kevin Green: It is not our members who are participating in slavery.

Q426 Chairman: Are you saying that none of them employs slaves in their supply chains?

Kevin Green: I am sure there are at the end of supply chains. I think you can see that people are trying to do the right thing. There is criminal activity—gangs out there that are very good at infiltrating legitimate businesses. That is the major issue. What you really want to do is to get our members on side, get them to identify those issues and feel confident that reporting them will not have a detrimental impact on their business. It is absolutely right to work with legitimate recruitment businesses, to make sure that people who are not compliant do not exist, because the supply chains are more effective, and make sure that our members—legitimate businesses—feel confident about reporting issues to law enforcement agencies, because this is criminal activity.

Chairman: Ian?

Lord McColl of Dulwich: My question has been asked and answered, but I think Caroline wants to extend it.

Mrs Spelman: No, I don't: I've asked about risk indices.

Q427 Baroness Kennedy of Cradley: The modern slavery evidence review and others—today actually—have suggested that companies should nominate a non-executive director who leads on anti-slavery activities. What do you think of that proposal?

Kevin Green: I have not thought about it before, but an immediate reaction is that it sounds eminently sensible. Having a non-executive on a board who is responsible for looking at this type of compliance agenda is right. It also means that they can question the executives and the leaders of the organisation to make sure things are happening

that should be happening, so it seems like a sensible suggestion. Obviously, it would be quite difficult to apply that to small and medium-sized businesses, so you might need to think about a slightly different approach for smaller companies, because they are not likely to have the same governance structure. Clearly, you want to make sure that these individuals have some kind of training or expertise, but I think it is a sensible suggestion.

Andrew Coulcher: As part of a package of measures, it would be a move in the right direction. If we were to extend the reporting requirements through the Financial Reporting Council, for example, to include much more of a dialogue around what measures organisations were taking to prevent modern slavery, and then having somebody owning that responsibility within your organisation as part of the package of measures, it would be a good thing.

Q428 Baroness Kennedy of Cradley: Others have suggested that maybe it should be the responsibility of the chief executive.

Andrew Coulcher: I think it is a shared responsibility. One of the things we are trying to do with our members—we have over 100,000 members worldwide—is introduce a more rigorous code of conduct, because it is often our members who are contracting with organisations where some of this malpractice is occurring. We are trying to hold them accountable through an annual test on ethical practices, for example, and making that a condition of their continued engagement with our particular institute. It is a package of measures.

We would like to see our members holding themselves more accountable and being more interested in understanding how they can put measures in place through their supply chains to help minimise or eradicate modern slavery. Extending the reporting requirements through the FRC, holding board members and the chief exec accountable for delivery of those commitments are all good things, but it is multi-tiered and multi-faceted; it is part of a package of measures.

Q429 Baroness Kennedy of Cradley: Kevin, do you have anything to add?

Kevin Green: Your previous suggestion of a non-exec seems more sensible. Chief execs quite often have huge jobs anyhow. Ultimately, they are accountable if there is something, but, if you want someone to take an active interest to drive the agenda in an organisation, a non-exec might be better placed.

Q430 Lord McColl of Dulwich: Andrew, you suggested that businesses should engage in planning for corrective action. Could you enlarge on that?

Andrew Coulcher: Part of it was related to the earlier question. It is helping the board—the chief execs, the non-exec, chief financial officer—to understand the implications of what malpractice in the supply chain can do from a reputational point of view, and the impact on their shareholders and share price. It is about making sure that an organisation has a robust system of identifying risk and auditing to prevent or manage the risk occurring in their supply chain. A lot of it is through training and awareness, not just of the supply chain organisation but across the organisation. We find there is a fairly well-recognised procurement or supply chain organisation responsible for contracting with suppliers, but quite often a lot of other people in the organisation are having a relationship with suppliers, so it is about raising awareness of where these risks might be occurring at all touch points in the organisation. We think a package of measures across the organisation is needed.

Lord McColl of Dulwich: Thank you.

Q431 Chairman: The Bill proposes an Anti-Slavery Commissioner. What sort of role do you think that person should have, and what difference would it make to your work, or should it make to your work?

Kevin Green: I certainly think it should have a focal point, someone accountable to highlight the issue, to drive it and to work across law enforcement agencies to promote what good practice looks like. There is a possibility that the GLA could work into that role in some way. One of the things we have seen is that the data-gathering co-ordination activity that the GLA has done in the sectors it is currently responsible for has proved very effective.

In the Bill we are talking about an investment of about £300,000 to £500,000, and my concern about a commissioner is that that seems to me to be two or three people. To undertake the activities and responsibilities we would potentially want that individual to carry out, they are going to need greater resource, just to touch all the chief constables around the country and talk to all the law enforcement bodies. It is a step in the right direction, but I would like to see a way in which we could give it more resource. There is an opportunity, if you look at the GLA, which is doing great work in this space, to extend its remit to support that.

Andrew Coulcher: I would agree. There is a need for a lot more co-ordination in this space. It would be wrong just to turn to the private sector to fix this problem, particularly when you are talking about extending supply chain internationally. There needs to be a point of

co-ordination—some organisation that is held accountable for managing the relationship with the private sector, Government, international Governments, border controls and NGOs. I do not think any part of the supply chain is going to be able to fix this on their own, so having that central point of co-ordination and accountability is a step in the right direction.

Q432 Mrs Spelman: You have mentioned a number of times the importance of training, which is right across the piece with this subject. There are first responders who need training because they do not fully understand what they are dealing with. From the second you have any tougher system of reporting and auditing, those businesses will need to get wised up to what can go on. Who would be best placed to provide such training? What would businesses respect in terms of a training provider? Would the chartered institute be able to provide such training? Should the GLA provide such training? Is it reasonable to charge for such training? Have you thought about a training regime?

Andrew Coulcher: The training approach we have taken initially is to develop a two-hour piece of e-learning, but we are not just targeting it at our members who are procurement supply chain people. We believe it needs to be extended throughout other parts of the organisation, like IT, HR and finance. That is where we have an opportunity to partner with organisations like Kevin's, to understand the training needs across different parts of the organisation. Is that one piece of learning, or do we have to adapt pieces of learning to make it relevant to other parts of the organisation? Ours is very specific around ethics, ethical procurement and our code of conduct—that is what we do; but there is a need, not just an opportunity, to spread that awareness throughout the organisation.

Q433 Baroness Hanham: Can I take you back to the commissioner? We have been talking today about a quite expanded role for the co-ordination that is envisaged in the Bill. We have been hearing a lot about that. In view of that, where do you think the commissioner should sit? At present, it is a Home Office appointment with the Home Office really in control. Do you think that would work? Should he be independent? Are there any alternatives to what is there at the moment?

Kevin Green: The greater the autonomy, the more effective. You want someone who can hold all parts of the enforcement body, including border control and parts of the Home Office, to be accountable. The more you make it outside the remit of any one Department, the better, but where does it then sit and how does it have accountability? Of the Departments that have been mentioned, I think the Home Office is as good as any, but the level of autonomy and independence, and the

ability to scrutinise, ask questions and challenge is hugely important. It may be the way in which the role is constructed, as much as where it reports to, that needs to be thought about.

Andrew Coulcher: I do not have anything to add.

Chairman: Thank you very much for that session. It was very helpful.