

# Can hand car washes be improved?

## An Intervention Evaluation with the Gangmaster and Labour Abuse Authority and Responsible Car Wash Scheme

### Summary

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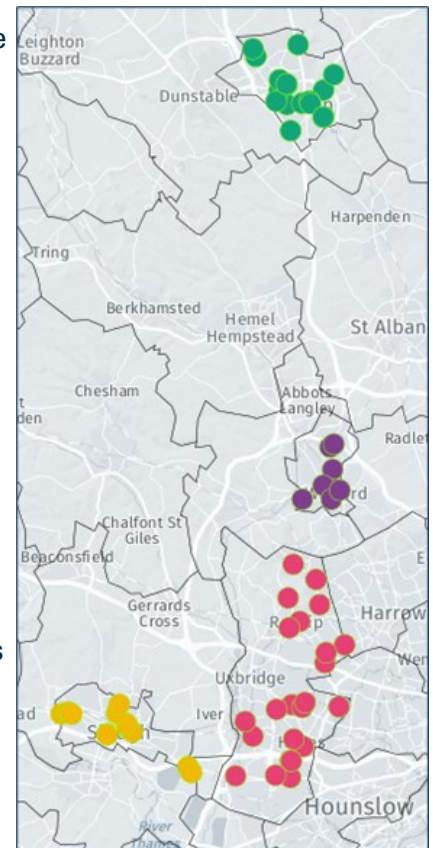


Gangmasters &  
Labour Abuse Authority



Responsible  
CAR WASH SCHEME  
'Promoting compliance, driving up standards'

Throughout 2021 the Responsible Car Wash Scheme (RCWS) and The Gangmasters and Labour Abuse Authority (GLAA) conducted a targeted project across four local authorities to test and understand the impact of engaging with hand car wash sites, their owners and landlords using a range of varying approaches. Over the course of the project 90+ sites were mapped across four local authority areas. Within three areas a specific engagement approach was used and in the fourth area nothing was done as a control. To measure any change that occurred across businesses in these test areas Nottingham Trent University's Work, Informalisation and Place Research Centre (WIP) mapped and recorded details of each site. Following engagement activities follow up physical visits were made to all sites at two subsequent time points. At one and three-months after interventions had occurred WIP staff recorded clear and obvious changes across the hand car wash population in each of the four areas and compared outcomes within each of the local authorities against a series of hypotheses about possible changes that may occur within each area.



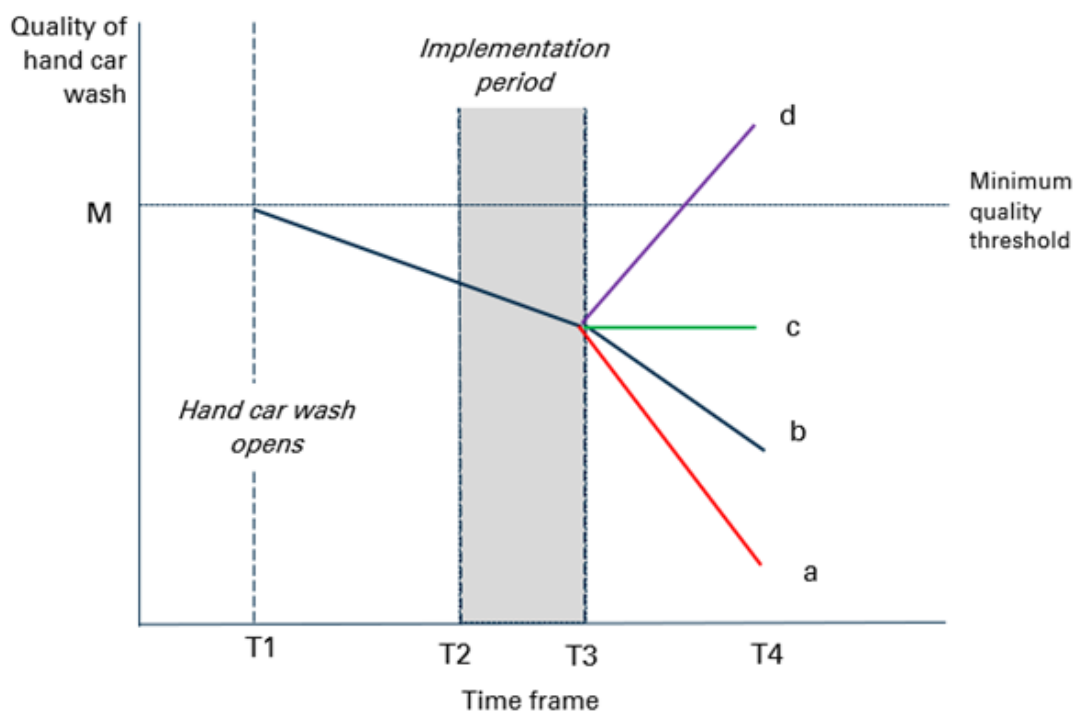
Location of hand car washes across the four local authority areas (Luton, Hillingdon, Slough and Watford)

The full report can be found online at: [hyperlink](#)

<p><b>Intervention 1 – RCWS engagement with local authority or Police participation - Slough</b></p> <p>RCWS undertook a full-scale engagement programme with one Local Authority District (LAD) building on knowledge of hand car wash locations to conduct engagement visits (on site visit sharing of information via leaflet, desk-based research into each site), local press and partner engagement (including targeted letters from the Local Authority), email/phone follow up with all sites. Full sign-up cost covered for one year by the scheme.</p>
<p><b>Intervention 2- RCWS engagement model administered solely RCWS - Luton</b></p> <p>RCWS undertook visits to all hand car wash locations within the intervention area with no external support. This intervention aimed to measure any difference between a RCWS engagement with or without Local Government or GLAA/Police participation. The sites are engaged solely by RCWS staff who visit all NTU identified sites and conduct engagement with business owners/supervisors alongside follow up engagement. As with Intervention One all businesses are contacted following site visit, but the standard RCWS sign-up fee was required.</p>
<p><b>Intervention 3 – GLAA Land Registry Landowner engagement - Hillingdon</b></p> <p>The final intervention aimed to understand the role landlords may play in the sector. Working with the Land Registry the GLAA used NTU site data to engage landlords of hand car wash sites. The GLAA used landowner data to share a standardised letter. The letter sought to engage the landowner by checking their knowledge of the hand car wash business operation, highlighting the potential risks of the businesses and sharing details of the RCWS scheme. The intervention aims to test landowner knowledge of the business operation and to explore if the approach led to engagement with RCWS voluntarily.</p>
<p><b>Intervention 4 – Control – Watford</b></p> <p>The control. Within this Local Authority NTU conducts virtual mapping of locations (and physical confirmation visits) The GLAA reviewed local interventions. As with Interventions 1-3 following a set period these locations are revisited physically to record any change over time to understand the natural change across the sector. This control Local Authority measures the natural change without intervention to establish a degree of churn in the sector.</p>

The objective of the project is to measure the difference between specific alternative engagement models in the sector. Using the policy implantation model shared overleaf the report explores the impact of each intervention against this tool to understand the possible value of each intervention

for policy makers. We were not exploring the success of RCWS voluntary licensing scheme or its normal model of operating. Across the project we did record that 2.9% of all sites progressed through the full audit and accreditation process with RCWS during the project. A further 4.4% of sites registered significant interest in signing up but have yet to register with RCWS. These sign ups to the scheme were both in one local authority, across this intervention the sign-up rate was 5%. All programmes of this nature will take time and our evaluation highlights the need to undertake a joined-up approach across enforcement agencies to showcase the connected nature of any enforcement and promotion work for business owners and workers.



Representation of possible policy outcomes arising from a policy intervention to bring the degree of labour market compliance above a minimum quality threshold.

In a sector that has historically been thought of as one of significant change with sites and businesses exhibiting regular churn, our wider research shows that on average the sites have been operating for over 9 years. The name, ownership and branding of sites may see more regular change, but the presence of informal and apparently non-compliant hand car wash sites has become an established and potentially accepted aspect of the urban landscape across the UK. We believe that a culture of permissive visibility occurs for hand car washes allowing illicit and immoral business and employment practices to occur across the UK.

The full report outlines the context for this project, how the RCWS operates and the project methodology. It discusses the initial data on each intervention area and presents a summary of the change that has occurred through the lens of a policy intervention model. The report also explores where the RCWS and partners should go next as they seek to improve the sector and ensure it can begin to tackle the association with endemic wage theft and poor business practice that blight its.

## Recommendations

Five key lessons for local authorities, regulators and law enforcement have been developed from this evaluation to improve the sector.

## **1. Tackling the hand car wash sector requires concerted and long-term engagement from multiple stakeholders**

The average site tenure across the sample of sites was 10.3 years indicating that many sites are an embedded presence in the social and economic fabric of these areas. To improve compliance within them will require long-term engagement with both consumers and regulators to highlight systemic failures and promote leading practice. These pilots highlight that whilst some change has been noted without concerted engagement large parts of the sector will continue to operate with little regard to the regulatory and legal obligations that society should expect.

The short-term nature of this project has shown shoots of encouragement, but they should be followed up and sustained to ensure business owners continue to be reminded of their legal obligations and transgressions followed up and punished. Based upon the available evidence, we are not convinced that a week of action model can change the direction of this sector for the better.

## **2. Fragmented oversight and enforcement reduce the ability to develop a joined up and systematic approach**

Our analysis of planning regulators across the projects areas highlights that there are significant failures in compliance and application with over 50% of sites having no recording planning application to operate.

The multitude of departments at local authority and governmental level creates uncertainty about who is responsible for tackling transgressions especially when they fall across multiple areas such as employment, trading standards, health, and safety, environmental and planning. The creation of a single register would be one way of connecting these bodies to ensure the point of focus is on the whole business enterprise and no single aspects of it.

## **3. A voluntary scheme even with support from local authorities and agencies will need time and enforcement-based support to influence the sector**

This project has shown through Intervention Two that a voluntary accreditation scheme has not yet been accepted as part of the standard operating needs of the sector. The purposeful refusal to engage highlights that additional influence must be utilised if, as a society, we wish to reduce unlawful employment and business practices in this sector. We are also convinced that any form of accreditation scheme needs time and significant promotion amongst business owners and those who use them.

Failure to create oversight of the sector will further enhance the acceptance of these businesses across the UK further weakening the rules and regulations that make our citizens, streets, and whole environment safe.

## **4. Supply side factors need to be considered alongside demand issues. The consumer and worker need to be engaged**

This project looked exclusively at the supply side of the equation understanding what could be done to increase take up of a voluntary scheme. Whilst some limited engagement through local

authority media was undertaken it was not designed to address demand side issues. More in-depth worker engagement is needed to highlight the minimum standards required from their employers (along with challenging notions of so-called self-employed status).

Alongside the engagement of workers and consumers there may be scope to consider the role of companies and individuals that facilitate the operation of hand car wash sites including those that supply hazardous chemicals including acids. Ensuring more stringent handling and purchasing requirements may go some way to ensuring business compliance across a broader range of factors acting as a push factor to ensure these businesses adhere to the full code of conduct requirements set out by RCWS.

## **5. Regulatory non-compliance must be followed up and tackled to ensure better adherence to regulations and legal standards**

RCWSs site visits alongside our own observations highlight a string of infractions which arguably have been in existence for some time, especially when we consider building standards and associated health and safety requirements alongside potential employment violation. This project has, at a minimum, showcased these to business owners and regulators which if nothing else has helped to challenge the status quo. Time will tell if the local authority and other agencies make use of this insight from the RCWS and WIP. As noted in the recommendations above a more unified approach is required with resources put in place to fully understand the scale and nature of the sector and to ensure action is taken to improve conditions for workers, consumers and the environment.

We hope this evaluation can further the understanding of the hand car wash sector and the ways to improve it for consumers, staff, regulators, and agencies who interact with them.

## **The Project Team from Nottingham Trent University**

The NTU team analysed the data and co-authored the report.



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