

Submission paper for the Matthew Taylor Review:

Waves Car Wash Group

May 2017

Introduction

- The Waves Group builds, operates and maintains a network of over 260 hand car washes across the UK mainly from retail locations e.g. supermarket car parks and shopping centres. The principle brand is Tesco Hand Car Wash (the Waves Group is completely independent from Tesco, the operation of the brand is under licence)
- We offer a “wash while you shop” car cleaning service from permanent purpose-built installations
- The group operates via a franchise network, employing around 2,500 people and cleaning around 3 million cars per year
- Waves is committed to recruiting and nurturing franchisees to create their own sustainable and successful businesses, whilst creating ethical employment opportunities for every employee



Changing an industry

Since Waves was set up in 2006, we have driven change across the industry to professionalise all operating standards, particularly around employment rights and conditions. Waves has achieved rapid growth (over 260 sites, and still expanding) by focussing on this. Measures taken include:

1. Compliance

- Working proactively with government / law enforcement agencies to understand legislation, develop and implement best-practice policy and deliver effective enforcement across the network e.g. UKBA, GLAA and HMRC
- Industry leading policies and processes across our network:
 - No zero hours contracts (minimum 16 hours per week)
 - No self-employed workers
 - Online employment compliance system to track status of all workers (RTW, NI numbers, driving licence, contractual rights, training record etc.) – real-time access to Waves AND intelligent notification of renewal dates etc.
 - Ensuring worker rights (holiday, sickness, grievance process etc.)
 - Prevention of modern day slavery via policy (e.g. transport/ accommodation) and specialist training and auditing
 - Prevention of NMW abuse –through reporting transparency and audit
 - Creation of confidential anonymous worker support phone line

- VAT registration prior to commencement of trading
- Zero tolerance (agreement termination) in the event of non-compliance

2. Training

- Building and operating a permanent national training centre (supported by 2 trading car wash sites)
- Multiple ongoing training sessions for franchisees e.g. annual national and regional events, on- and off-site training supported by agencies e.g. UKBA, GLAA and HMRC
- Launch of tailored development package and customer service training for all franchisees and their employees

3. Oversight

- Operations team led by experienced retail Operations Director with c.20 people providing full-time in-field training, coaching and auditing support as well as a specialist Compliance Manager
- Online audit process, plus CCTV, surveillance, mystery shops etc.

These measures have improved the quality of work across the estate as all workers are given minimum contracted hours, paid fully for the time worked and are given training to improve their productivity and competence. The Waves values (honesty, respect, family, innovation and pride) also foster recognition / celebration of work done at all levels.

Continuing challenges to improving worker rights:

1. **Franchisee non-compliance** – although decreasing, this continues despite the contractual provisions, training, auditing and zero tolerance policy summarised above. The prevention of worker exploitation is our top priority in this matter.
2. **Agency / law-enforcement** collaboration – most of the government's agencies are helpful and collaborative to businesses like Waves who genuinely want to lead on compliance, but there are opportunities to improve this in certain areas
3. **Existing policy conflicts** – some current legislation / policy fosters conflict e.g. self-correction on NMW and the working tax credit systems – this makes detection and remedy much harder

What is Waves doing to continue to improve worker rights in our industry?

Improving compliance

Network-wide installation of real-time CCTV, biometric hours log and ANPR technology to achieve full financial transparency and employment compliance

Improving retention rates

In 2017 Waves is launching an online worker development programme to encourage our workers to stay in our network, through training experience and professional development (see below)

Transferable skills and professional development

To build on our existing training platform by providing a development programme for every worker

Asking for increased accountability across the whole industry – Waves has taken bold steps and invested considerable resource in a bid to lead the industry (this was commented upon in court case judgment A55YJ202 by recorder Judge Lowe QC, May 2016). We are exploring options to influence the rest of our industry further via trade bodies and NGO's

Author's note:

This has been written as a top-level briefing paper. We are very happy to provide to further information or detail around these or any other points. Please do not hesitate to contact us

