

WEED OUT EXPLOITATION

How to improve the reporting of labour exploitation, and protect the seasonal agricultural workers staffing Britain's farms.

28 February 2022

WoRC
Work Rights Centre

TABLE OF CONTENTS

Executive Summary	2
Imagine working on a farm	3
This is the story of migrant workers in the agricultural sector	5
The enforcement ecosystem	8
Barriers to reporting exploitation on farms	9
Conclusions and recommendations	11
Gangmasters and Labour Abuse Authority	11
Health and Safety Executive	12
Home Office	12
About Work Rights Centre	13
About the data	13

EXECUTIVE SUMMARY

Seasonal Agricultural workers experience some of the harshest work conditions in the UK. Having to work long hours for minimal pay, in social and geographical isolation, they have been consistently flagged for being at severe risk of labour exploitation, and a priority for labour market enforcement agencies.

Drawing on a year of casework with seasonal agricultural workers recruited under the government's Seasonal Worker Pilot, this briefing examines the barriers which prevent them from reporting exploitation, and the measures needed to address them.

We found that the obstacles to reporting are complex and multi-layered.

Individual workers often lacked the knowledge of employment rights and the enforcement system. When they also struggled with English, time, and trust, the notion of reporting an issue to the authorities was unfathomable for many.

Certain farm and agency practices exacerbated the distance between workers and labour enforcement agencies. Employment contracts which were poorly translated or absent contributed to the lack of information on rights. More worryingly, supervisors who wielded power unchecked could scare workers off reporting, with myths that doing so would prevent them from finding work in the UK in the future.

There were also issues in the enforcement system. While the Gangmasters and Labour Abuse Authority (GLAA) strives to prevent and prosecute labour exploitation, the absence of a client charter setting out if, when, and how reports might lead to an investigation, left many workers in doubt. Other agencies, such as the Health and Safety Executive (HSE), were completely unknown to workers, and failed to carry any inspections in the agriculture sector over the past year.

To overcome these barriers and encourage workers to report exploitation, this briefing recommends that labour enforcement agencies take several steps.

The Health and Safety Executive would benefit a more proactive approach to inspections and worker engagement.

The Home Office could raise the penalty for labour providers who breach their sponsorship agreements, to send a message that labour exploitation will not be tolerated.

The GLAA, who have made worker engagement a strategic objective, could further remove barriers to reporting by answering workers' questions about the safety of reporting; implementing a client charter, to set realistic expectations about how reports trigger investigations, and how workers can benefit from reporting; working closely with employers, to implement a standard of supervisor accountability; and collaborating with migrants' rights organisations to gather intelligence and increase the rate of reports which turn into investigations.

IMAGINE WORKING ON A FARM

Imagine scrolling through Facebook. You come across an advert offering you a visa to the UK and bountiful seasonal work. You will, it assures you, earn plenty. You get in touch, pay a \$300 fee to an intermediary, and book your flights. You think you'll make the money back. With a minimum guarantee of 35 hours' work per week, you can put in the effort and be rewarded for it. You're told there will be accommodation, for a modest fee, available at the farm. Your visa is tied to a recruitment agency, but maybe you'll make some friends. Maybe you'll get to know local people and learn about the culture. You have no idea how different things will be.

Migrants are lured into working in unsafe, precarious conditions on British farms every day. Drawing on the real-life stories of 26 seasonal agricultural workers who contacted our clinic last year, this briefing documents their journeys, and what enforcement agencies need to do to better protect them.

ARRIVING AT THE FARM

When you arrive in the UK, you're met at the airport and taken to the supermarket to get some provisions for the week ahead. You better plan this well, you're told. You're only allowed one shopping trip a week. Then, it's on to the farm. It's fairly isolated. Your thoughts about getting to know some British people may not come to fruition, it seems. But it's okay because you'll be working in a team - something you enjoy.

Your caravan isn't what you expected. You're sharing it with five others and it's very cramped. There is not much room in the fridge for fresh food either. When you're next taken to get groceries, you'll need to get more canned goods. You test out the cooker and an alarm sounds. It's unsafe. There is mould all around the caravan and the windows aren't sealed properly so there's a draft in your room. The shower and toilet facilities are a walk away and they aren't clean either. They appear to be flooded.

FIGHTING FOR WORK

After an uncomfortable night's sleep, you emerge for work to be told the people in the caravans closest to the pickup point fulfilled the required number of workers for that day, so you won't be needed until tomorrow. You have no transport so you can't go anywhere. The hours pass slowly. The next day is the same. And the next.

You ask a manager if you can be moved to another farm and are told you need to put in a request with the agency. You comply, but they get back to you with a general response, requesting you to fill out their complaint form. You never hear back. That week, you don't get any of the 35 hours you were promised, but you remember that the contract said you'll be paid regardless. A manager tells you that you don't have to pay the caravan fees that week, and you better not cause any trouble if you want to come back next year. The energy bills are a different matter. You still have to chip in. Another worker tells you they once went for three weeks without work.

A CULTURE OF CONTROL

During the second week, your fortunes appear to change. Some of the other workers have complained about back pain. They won't be paid, as they've "refused work". But you count your blessings - at least it's your turn to work.

You'll be picking apples. This would be okay, except there doesn't appear to be much respect for health and safety. You perch atop a shaky ladder, plucking apples with your bare hands. PPE is not prevalent. The target you must meet is near impossible and your supervisors are relentless. You ask for water. They bring some and hold it out, telling you to meet your targets before pouring it onto the ground in front of you. As they walk away, you hear them mutter an ethnically-targeted slur.

Your payslip doesn't reflect the 35 hours' guaranteed payment. You're told to contact the agency if you have a problem, but how? On and on, work is a matter of feast or famine. If you're viewed as reluctant or problematic, you'll have work withheld in a way that seems personal.

A supervisor reminds you that your visa is tied to the agency and can always be rescinded. You learn that people have fallen off ladders and been burnt with chemicals while working on the farm. One day your supervisor pulls you and two others to help with the renovation of his house. None of this seems right, but you do what you're told.

THIS IS NOT A FICTIONAL STORY

All of the incidents in this story have been recalled to us by real people. Over the past year, we've supported 26 seasonal agricultural workers who came to the UK from Ukraine, Belarus, Romania, Bulgaria, Kyrgyzstan and the Republic of Moldova, hoping to find decent work on a farm.

They found us on social media or by word of mouth, and got in touch after emails to the agency went unanswered. Occasionally, after paying for utilities there were weeks when they weren't even making the National Minimum Wage. They are isolated, hidden out of sight in caravans clustered away from the main roads, and cut off by lack of public transport. When work is available, it is often backbreaking and frequently unsafe.

According to the Health and Safety Executive (HSE), every week over the past ten years, almost one person has been killed as a direct result of agricultural work.ⁱ Agriculture has the worst rate of worker fatal injury in the UK, 20 times higher than the industry average.ⁱⁱ Because reporting of accidents and cases of ill health in the industry is generally poor, the scale of everyday injury remains unknown.

THIS IS THE STORY OF MIGRANT WORKERS IN THE AGRICULTURAL SECTOR

Migrant workers are the backbone of the UK's agricultural sector, but are treated as second-class citizens. In 2021, over 41,000 visas were issued for temporary workers (Fig 1). According to the UK Labour Market Enforcement Strategy 2020/21, these jobs are described as physically hard and repetitive, dangerous, low paid, geographically and socially isolating.ⁱⁱⁱ

EU workers have historically filled the vast majority of these roles. In 2018, the ONS estimated that 99% of agriculture jobs were filled by EU citizens.^{iv} More recently however, farmers' concerns with securing labour supply after Brexit ended the free movement of EU workers prompted the government to (re)introduceⁱ a visa scheme for workers from other parts of the world. Adopted in 2019, the T5 (Temporary Worker) Seasonal Workers' Pilot allows people from several non-EU countries to work for a maximum of six months on UK fruit and vegetable farms (Fig 2).^v

Originally implemented on a pilot of 10,000 visas, by the end of 2021 the government committed to extending the scheme until 2024, issuing 30,000 to 40,000 visas per year. Four operators are licensed to sponsor workers under the T5 Seasonal Worker route.^{vi} Workers' visas are tied to their sponsor, meaning that any requests to change farm must be approved by the agency.

A HIGH-RISK SECTOR

The risk assessment underpinning the 2020/21 strategy classed the threats experienced by seasonal agricultural workers as 'severe' for three consecutive years. It found that "vulnerable seasonal workers are being exploited", with "some cases indicative of modern slavery", and "many more not receiving NMW."^{vii} The only other sector with the same degree of severity was hand carwashes (Table 1).

Similarly, the Health and Safety Executive (HSE) notes severe risks to health. Though only 1 in every 100 working age people in the UK work in agriculture, this type of work accounts for 1 in every five fatal workplace injuries.^{viii} Farm workers are also exposed to the effects of bad weather, noise, dust, and physical strain, with many workers suffering from musculoskeletal injury and rates of asthma twice the national average.^{ix} Sadly, this is likely to be the tip of the iceberg due to non-reporting. Many workers in the industry do not consult their doctor unless seriously ill, with one HSE publication noting that barely 16% of health issues are reported.

ⁱ Long before this pilot, the UK ran a Seasonal Agricultural Workers Scheme (SAWS). Established in 1943, the SAWS historically recruited workers from Eastern Europe. The SAWS was abolished in 2014, when Romania and Bulgaria gained the right to work under European free movement rules, reducing the need for recruitment outside of the EU. Under the SAWS, workers' visas were tied to particular farms. The new pilot ties them to one of the four recruitment agencies.

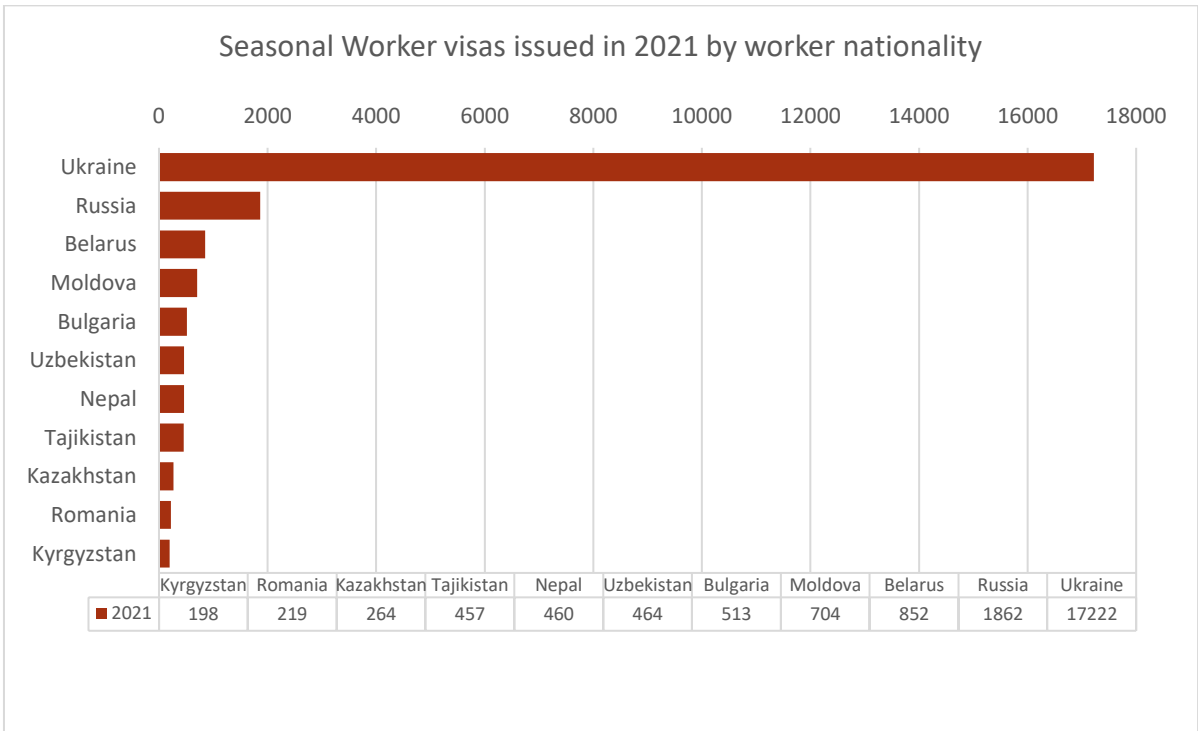


Figure 1 Seasonal Worker visas issued in 2021 by worker nationality. Source: Home Office Immigration Statistics, Entry Clearance Visas - Applications and outcomes. Published 25 Nov 2021

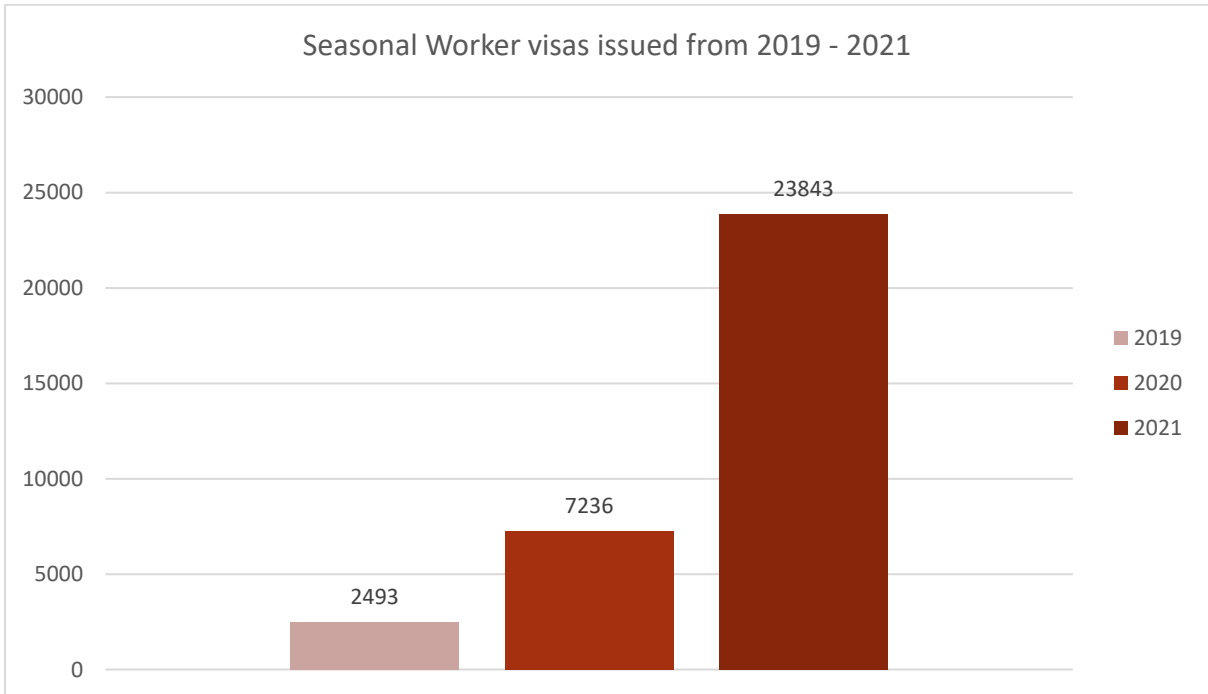


Figure 2 Seasonal Worker visas issued from 2019-2021. Source: Home Office Immigration Statistics, Entry Clearance Visas - Applications and outcomes. Published 25 Nov 2021

Sector	Threat description	2018/19 assessment	2019/20 assessment	2020/21 assessment
Hand Car Washes	Vulnerable workers are being exploited, some cases indicative of modern slavery. Many more in the sector are not receiving NMW/NLW.	Severe	Severe	Severe
Agriculture (seasonal workers)	Vulnerable seasonal workers are being exploited, some cases indicative of modern slavery. Many more in the sector are not receiving NMW/NLW.	Severe	Severe	Severe
Care Sector	Vulnerable workers are being exploited, some cases indicative of modern slavery. Many more in the sector are not receiving NMW/NLW.	High	High	High
Construction	Vulnerable workers are being exploited, some cases indicative of modern slavery. Many low- skilled workers in construction are not receiving NMW/NLW	Medium	Medium	High
Hospitality	Vulnerable workers are being exploited, some cases indicative of modern slavery. Many more in the sector are not receiving NMW/NLW.	Medium	Medium	Medium
Shellfish gathering	Unlicensed activity and illicit gathering from closed beds present opportunities for exploitation to occur	Medium	Medium	Medium
Nail bars	Vulnerable adults, and in some cases children, are being exploited. Some cases indicative of modern slavery. Some workers not receiving NMW/NLW	Medium	Medium	Medium
Poultry and eggs	Many workers in the sectors are not receiving NMW/NLW.	Medium	Medium	Medium
Warehouses and distribution centres	Many workers in the sectors are not receiving NMW/NLW.	Medium	Medium	Medium

Table 1 **Assessment of labour market enforcement threats**. Source: UK Labour Market Enforcement Strategy 2020/21, p23

THE ENFORCEMENT ECOSYSTEM

The four operators approved by DEFRA to sponsor workers under the Seasonal Pilot are regulated by the UK Visas and Immigration (UKVI) Enforcement Teams. Under the conditions of the scheme, they have a duty to monitor workers' welfare, including to ensure that their work environment complies with Health and Safety requirements, that workers are treated fairly, with time for breaks and free from discrimination, and that procedures are in place to allow them to report concerns.^x

Breaches of employment protections usually fall within the remit of the Gangmaster and Labour Abuse Authority (GLAA).² Created in 2005 to prevent gangmasters operating illegally in agriculture, horticulture, shellfish gathering, and food processing and packaging, the GLAA has become the de facto agency for labour standards enforcement in agriculture - though its remit now extends to tackling exploitation across all sectors.

With a team of 119 staff, the GLAA operates a licensing scheme for labour providers in the four sectors, works with other enforcement agencies and the police to identify and support victims of labour exploitation, and engages a diverse range of stakeholders to prevent it.^{xi} Workers can report concerns to the GLAA via an online form (available in eight languages), or over the phone with translators available in any language.

In 2021, the GLAA identified 7,728 potential victims of labour exploitation. Most victims were found through compliance activity in the food processing and packaging sector, and the abuse related to holiday pay.^{xii}

Other enforcement agencies regulate certain aspects of farm work, though take a less proactive approach to worker engagement. The HMRC National Minimum Wage team reported only small numbers of enforcement cases across agriculture, noting difficulties in identifying workers at the right time.^{xiii}

The Health and Safety Executive noted in their annual report that no agriculture inspection visits were arranged or conducted over the whole course of 2020/21.^{xiv} This remains an objective for the 2022 business plan. By the end of the year, the HSE plans to organise an agricultural compliance event, and inspect the businesses which attend.^{xv} The HSE makes no mention of unannounced visits, or any plans to reach out to seasonal agricultural workers directly.

² There is some regional variation. GLAA can enforce licensing in Scotland and Northern Ireland but cannot use their wider enforcement powers.

BARRIERS TO REPORTING EXPLOITATION ON FARMS

The drivers of exploitation are complex and multi-layered. Several publications have documented the ways in which deception in recruitment, work conditions under duress, and the nature of the Tier 5 Seasonal Worker visa foster a culture of control. Focus on Labour Exploitation, a charity, provided an in-depth account of how seasonal workers risk falling prey to forced labour, based on interviews with migrant workers.^{xvi} The Labour Market Enforcement Strategy offered an assessment of sector risks, with insight from enforcement agencies.

This briefing stems from active participation in frontline casework. Drawing on our experience with 26 seasonal agricultural migrant workers, we examine the **barriers to reporting exploitation**, with a view to improve workers' engagement with enforcement agencies, and uphold a culture of decent work.

Individual worker vulnerabilities. The vast majority of farm workers who contacted us had difficulties in diagnosing and reporting exploitation. While everyone who reached out felt that something was *morally wrong* in how they were treated, they didn't know if they had *the legal right* to demand better. The worst part of working in isolation, surrounded only by other migrants who endure the same conditions, is that precarious work can feel unchallengeable - "what things are like around here".

The confusion over entitlements was exacerbated by unclear contractual arrangements. Previous research by FELX found that workers had been pressured into signing contracts they did not understand.^{xvii} One of the workers we supported was missing a contract entirely. In other cases, contracts were provided only in English, or were inadequately translated – in a clear breach with the UKVI sponsorship agreement.^{xviii} In one tragicomic example, the clause "I understand the terms of engagement" was translated in the Russian version of the contract as "I understand the terms of military action".

There were also issues with reporting. Few of the farm workers knew about the GLAA and its role in tackling exploitation. Even after we explained what the GLAA does, there were barriers of language, time, and trust - in self and in the system. Migrant workers frequently asked us if contacting the GLAA would expose them, leading to abuse by supervisors or other workers; if they would be required to speak English, which would be impossible for many; but also if taking the step to report was *worth it*.

It is important to acknowledge the fact that reporting was seen to come with a social and psychological cost. Consequently, migrant workers had questions about the benefits of reporting, such as "will I be able to recover unpaid wages", and "will I get any compensation for broken contractual promises".

Bullying from supervisors. Reporting was made harder by supervisors who commanded a significant amount of power on farms. There was a sense among some of the workers who contacted us that supervisors were untouchable. They came across as employer favourites who had worked their way up over the years, and adopted a heavy-handed approach in the management of other workers to retain their own privileges in the farm hierarchy.

None of the workers who approached us knew how to make a complaint about supervisors' behaviours. In the more worrying cases, they felt that the farms wouldn't take complaints seriously, and there was little sense in flagging bullying.

The unchecked power of supervisors allowed the perpetuation of myths, including about labour rights and the GLAA. One worker who had been beaten up was told that, if she reports it, she'll be blacklisted from all future work. Others were prevented from reporting unsafe conditions in their caravans with threats that doing so would lead to their dismissal.

Limits of the enforcement system. Beyond the individual dynamics, there are also barriers at systemic level. In the UK Labour Market Enforcement Strategy 2020/21 report, Matthew Taylor noted that while workers and employers welcomed the introduction of a licensing scheme, there were some limitations at the level of GLAA's investigations. First, a large number of labour providers hadn't been inspected in years, and as many as 364 hadn't received a single inspection in a decade. Second, even when workers and other stakeholders took the step to report labour abuse, only a fraction of reports turned into investigations. In 2018/2019, less than 1 in every 3 complaints about agriculture turned into an investigation.

The HSE, for its part, was virtually invisible. Without conducting a single investigation in the agricultural sector, and no apparent plans for worker outreach, the HSE remains far removed from seasonal migrant workers.

From the point of view of workers, not knowing *if, when, and how* the GLAA would investigate a complaint was a major deterrent to reporting. The *how* aspect raised the most questions about *the benefits* of reporting, whereby workers asked themselves "will I receive any form of compensation", but also about *the social costs* of blowing the whistle, namely "will contacting the GLAA have me sent home", or "will it prevent me from working in the UK again".

The absence of a client charter left these questions unanswered. Finally, even in the six cases when workers made the decision to report, their visas had run out before any news of an investigation reached them. Whether investigations were carried out too late, or never, we can't know for sure. What we do know is that the lack of communication from the GLAA left workers, and charity caseworkers, dismayed.

CONCLUSIONS AND RECOMMENDATIONS

The barriers to reporting exploitation on farms are multi-layered. They are shaped by individual workers' vulnerabilities, the power dynamics between workers and supervisors, and the ecosystem of labour market enforcement. There is no silver bullet, and we are aware that all recommendations are influenced by funding and resources available.

Gangmasters and Labour Abuse Authority

The 2020/21 Strategy noted that, among other things, the GLAA would benefit from a review of the licensing system and budget to increase compliance inspections and the number of routine and unannounced visits on farms. It also recommended an increase in data analysis capacity and its sharing with government departments like the Home Office and BEIS. While we fully support the call to buttress the GLAA's capacity, this section focuses on further steps which the agency can take to improve reporting.

Make seasonal agricultural workers' rights visible, to tackle the barriers posed by workers' lack of familiarity with their entitlements and encourage reporting. The GLAA has a good range of worker-facing leaflets and has invested in social media advertising. More can be done by the four recruitment agencies and by farmers to uphold a culture of safe reporting. This could be achieved by embedding employment rights champions within the farm, to answer workers' questions, build trust, and increase accountability. It could also be supported by clear signposting of employers' zero tolerance towards exploitation, and the means to call it out.

Answer workers' questions about reporting, to give them the confidence to flag exploitation. Many migrant workers feared that reporting an employer or recruitment agency would prevent them from losing work or finding work in the future, especially when only a handful of operators were licensed to recruit from their countries of origin. Worker-facing materials should acknowledge their questions about the safety of reporting, and be clear about how they would be protected during an investigation.

Implement a client charter, to build trust in the reporting system. There are big gaps in workers', and caseworkers', understanding of *if*, *when*, and *how* their reports to the GLAA might turn into an investigation. A client charter that is clear about how the GLAA handles reports, how it decides to pursue investigations, and what reporting parties can reasonably expect from the GLAA, could fill that vital gap. Given its role in trust building, the charter should feature prominently in all public facing materials, including those targeted at migrant workers.

Work with employers to implement a standard of supervisor accountability. Many of the grievances shared by migrant workers referred to the unchecked power of supervisors who pressured them into unrealistic targets and frequently resorted to

bullying. The GLAA can take the lead in setting a standard of accountability, by requesting license holders to adopt and widely publicise a zero-tolerance policy against bullying by a supervisor. Currently, the licensing standards note only that license holders have a duty to “deal properly with disciplinary matters and grievances”. The GLAA can uphold a culture of *good work* by fleshing out how licensees should check the power of supervisors.

Work closely with migrants’ rights organisations. The GLAA has made a strategic commitment to working with all stakeholders to protect workers’ rights and prevent labour exploitation. This was delivered through trainings, joint outreach sessions, newsletters and consultative forums. We fully support this engagement. We also see scope in developing it. Researchers and frontline staff from migrant organisations can provide insights into barriers to reporting and how to address them, but also offer specific intelligence about ongoing cases of exploitation, supporting the capacity of the GLAA’s own investigative teams. There is scope to work more closely with frontline organisations in intelligence gathering, including by adopting a frontline caseworker channel of communication.

Health and Safety Executive

Implement a worker outreach programme. While the HSE has documented the risks associated with agricultural work in some detail, the agency’s engagement with workers or their representatives is minimal, and reports can only be submitted in English. A more proactive engagement of workers and migrants’ rights organisations is key to raising awareness of their rights to a safe workplace. This can be achieved through targeted communications outputs and stakeholder forums, similar to the model adopted by the GLAA, as well as by making the HSE’s reporting tool more accessible with different language options.

Raise the bar for health and safety, through unannounced proactive inspections. The current plan to conduct investigations on farms which voluntarily attend compliance training are premised, in effect, entirely on self-selection. This gives businesses little incentive to invest in health and safety outside of the HSE inspection calendar. Unannounced visits could spur more self-regulation.

Home Office

Raise the penalty for non-compliance. While the sponsor agreement with the Home Office requires the four licensed operators to provide workers with contracts in their language, to allow them to transfer farms, ensure a safe workplace and guarantee at least 35 hours of work, this briefing found that these duties were frequently broken. The Home Office should raise the penalty for non-compliance and send a clear message that labour exploitation will not be tolerated as part of the Seasonal Worker Pilot.

ABOUT WORK RIGHTS CENTRE

Work Rights Centre is a registered charity with a mission to end in-work poverty. We do this by helping people exit precarious work conditions, and by supporting them to improve their professional mobility with employability advice and civic training. The charity was founded in 2016. Ever since, we have advised over 3,000 people, helped recover over £150,000 in unpaid wages and fees, and supported hundreds more to make job applications and secure their status after Brexit by applying to the EUSS.

Our frontline service consists of two multilingual teams of advisers who operate in London (5 days a week) and Manchester (on Saturdays). Together, the 3.6FTE members of the advice team assist an average of 20 beneficiaries a week, with issues which range from non-payment, insecure immigration status, and career advice. You can support their work here <https://www.workrightscentre.org/support-us>

ABOUT THE DATA

The figures in this report are based on our Client Management System. Every time our advisers work with a new beneficiary, they keep a record of the issue they contacted the charity about, the information we provided, actions taken, and any referrals we made. Subject to consent, we also collect demographic and equalities data, data on levels of literacy, and financial need. This allows us to provide anonymised, aggregate reports, which evidence the trends in our beneficiaries' issues.

Anonymous case studies are collected from interviews with frontline staff and beneficiaries, subject to consent. All personal details are removed or replaced.

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