

By email only

The Rt Hon Yvette Cooper, MP, Home Secretary,  
2 Marsham Street  
London  
SW1P 4DF

16 April 2025

Dear Home Secretary,

**Immigration policy changes to protect the human rights of migrants exploited under the work sponsorship system**

We write to you as a coalition of individuals and organisations working towards the advancement of migrant workers' rights in the UK.

We write to express our serious concerns around the treatment of migrant workers arriving to the UK on sponsored work visas and the lack of meaningful policy interventions by the UK government to protect the human rights of those affected by exploitation in the workplace.

We are calling on the government to make three fundamental changes to immigration policy around sponsorship, to: protect victims of exploitation, empower migrant workers to report and leave exploitative workplaces, and hold abusive sponsors to account. In our view, these measures are urgently needed to ensure the UK's work migration system protects the dignity and human rights of migrant workers.

**Evidence of exploitation and forced labour indicators**

A large body of evidence including from the Independent Chief Inspector of Borders and Immigration, the National Audit Office, trade unions, the third sector, academics and the media,<sup>1</sup> has in recent years revealed that workers on employer-sponsored routes like the Health and Care Worker visa and the general Skilled Worker visa category have reported being subjected to exploitative and unlawful practices.

These exploitative and unlawful practices include all of the [International Labour Organisation's indicators of forced labour](#) including: abuse of vulnerability; deception; restriction of movement; isolation; physical and sexual violence; intimidation and threats; retention of identity documents; withholding of wages; debt bondage; abusive working & living conditions; and excessive overtime and working hours.

In respect of migrant care workers in particular, the beneficiaries we represent and advocate for include hundreds of people who took up life-altering levels of debt in their countries of origin to obtain an offer of employment in the UK, only to realise once in the UK that their

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<sup>1</sup> For example, see recent reports from [ICIBI](#), [NAO](#), [UNISON](#), [The Work Rights Centre](#), [The Modern Slavery & Human Rights Policy & Evidence Centre](#) and [the Bureau of Investigative Journalism](#).

visa sponsors never had any intention of providing them with the work agreed. As a direct result of restrictions imposed on them by their Health and Care Worker visas, which neither permit them to work for non-licensed employers until they find a new sponsor, nor to access public funds, we encounter individuals who: become street homeless; struggle with food poverty; are forced by their sponsors to do work they had never agreed to, under threat of visa curtailment; or have no choice but to survive by taking precarious cash in hand jobs on the black market, where they face re-exploitation. In the worst cases we hear from workers being sexually exploited by sponsors. Overwhelmingly, the victims are more likely to be women.

These are not isolated examples of abuse. **Over the last few years, the number of migrant workers and their dependants affected by labour exploitation perpetrated by sponsors runs into the tens of thousands.** [In social care alone, the government recently confirmed that from July 2022 to December 2024 more than 39,000 workers had been affected by the revocation of more than 470 sponsor licences to clamp down on abuse and exploitation.](#)

### **The sponsorship system is at risk of breaching the UK's international human rights obligations**

Over time, relevant stakeholders have come to understand that sponsorship entrenches a power imbalance between workers and rogue employers that makes it easier to abuse and coerce workers into situations of labour exploitation.

For example, [the Gangmasters and Labour Abuse Authority](#) has noted that sponsorship is the most common vulnerability factor among potential victims of forced labour in the UK. [The Care Quality Commission](#) has also noted that workers are being exploited through the immigration system. [The Parliamentary Under-Secretary of State for Migration and Citizenship](#) has recently stated that the *"requirement to be sponsored and the workers' reliance on their sponsor can, in some circumstances, make it more difficult for sponsored workers to change their employer"*. This by extension means it is more difficult for exploited workers to find alternative employment through the sponsorship system, and recent initiatives to facilitate sponsor rematching have had a limited impact on that challenge (as discussed further below).

**Despite this, the sponsorship system continues to lack meaningful protections for affected workers, and is at risk of breaching the UK's international human rights obligations.** This includes potential breaches of Article 3 (prohibition on torture, inhuman or degrading treatment and punishment), Article 4 (prohibition on slavery and forced labour) and Article 8 (right to respect for private and family life) of the European Convention on Human Rights ('ECHR').

### **Policy responses to date have been ineffective in safeguarding workers**

[The government has recently introduced some measures](#) to try to tackle exploitation, particularly in the social care sector. This includes enhanced compliance activity by the Home Office, preventing sponsorship costs from being passed on to workers, and enhanced bans and action plans for employers deemed to be falling foul of Home Office rules on

sponsorship. However, while these measures may contribute to prevention, they do little to safeguard the interests of, or offer remedy for victims whose rights have already been breached, nor do they address the controlling relationship and lack of worker flexibility at the heart of sponsorship itself.

In the social care context, evidence suggests that the only tailored programme of support for migrant victims of labour exploitation is not working efficiently and is unsuited to deal with the scale of abuses faced by migrant workers. Last year, [The Department of Health and Social Care's International Recruitment Fund](#) was repurposed to facilitate in-country matching of workers who had been displaced by "unethical practices or by their employer's sponsorship licence being revoked". However, according to a recent [Freedom of Information Request](#) the programme has only successfully supported less than 6% of migrant care workers who approached the partnerships into new employment.

The government's recent effort to support sponsor rematching by [requiring employers in the care sector to recruit from this pool of workers before seeking to sponsor new recruits from other immigration routes or from overseas](#) is also unlikely to provide the remedy required. At the current pace of recruitment, and where employers are looking for particular combinations of experience, individuals who hold UK driving licences and proximity, supporting all the thousands of people who are precariously awaiting a rematch is likely to take years.

**Without urgent changes in immigration policy which are victim-centric by design, the sponsorship system risks pushing thousands of workers and their dependants into irregular migration status, leaving them exposed to destitution and re-exploitation. Indeed, for many of the people we support, this has already happened.**

### **Recommendations for policy change**

Comparative research of immigration policies adopted in the UK and other developed countries which operate employer-sponsored migration systems, reveals that UK immigration policy leaves some of the widest gaps in worker safeguarding. This can and should change. The Work Rights Centre report, *Safeguarding Sponsored Workers*, examines measures adopted in Australia, Canada, Finland, New Zealand, the Republic of Ireland, and the U.S.A. to put forward three policy solutions that would be impactful for sponsored migrant workers in the future.

Based on the learnings from these international examples, we urge the government to:

1. **Adopt a UK "Workplace Justice" Visa for victims who report exploitation.** Inspired by measures applicable in Canada, Finland, and particularly Australia, this new route should empower people who suffered exploitation and reported it to labour rights authorities or support services to leave abusive sponsors by providing them with a new, secure immigration status - thus removing the debilitating fear of falling into irregularity, and providing them with the means to support themselves. Based on international best practice, a UK Workplace Justice Visa should be open to applicants regardless of the validity of their leave, it should grant them the right to remain and work for at least as

long as their original work visa, and be accessible in practice, including by adopting proportionate evidential requirements reflective of the wide continuum of exploitation that sponsored migrant workers experience.

**2. Give all sponsored workers more time and the means to find alternative employment.**

While opening a UK Workplace Justice visa would be a lifeline for people who report an exploitative sponsor, there will almost certainly be people who should qualify for this route but fail to obtain it – be it due to their inability to engage with the reporting process, the level of evidential requirements, or other factors. To empower those individuals to leave abusive workplaces and find a new sponsor, the Home Office should formally extend the 60-day grace period between the end of employment and visa curtailment across all sponsored routes. A general extension to six months would match more generous timeframes seen in other countries, and would give all migrant workers a more reasonable timeframe in which to find another job, make another immigration application, or ultimately leave the UK. Following the example of Australia, migrant workers should also have more flexibility to take up work during this grace period without needing a Certificate of Sponsorship to start a new role – this would prevent the risk of homelessness and destitution, while allowing legitimate employers to trial the recruitment of those workers before incurring the significant costs associated with sponsorship.

**3. Increase penalties for individuals and employers that are abusing sponsorship.** The UK government should go further by establishing better options for remedy and compensation for workers, which would include through sanctions on employers, such as civil penalties. This new regime should clamp down on employers who use threats of visa curtailment to silence grievances or coerce migrants into accepting unacceptable conditions at work. A new regime could also help to compensate workers directly for the consequences of mistreatment, including on issues like non-payment of wages. It may also help to subsidise the costs of running a UK Workplace Justice visa system at no charge to prospective applicants.

Without these changes, which would redress the power imbalance inherent in sponsorship and make it harder to freely abuse workers, we are likely to see reports of sponsored migrant worker exploitation continue in various sectors and job roles in the future.

As the government continues to work on its anticipated immigration white paper and its Plan to Make Work Pay in 2025, we ask that it acts urgently in adopting these measures to help prevent the exploitation of migrant workers in the sponsorship system and to hold those exploiting workers to account.

We would request that the Home Office engages with and consults stakeholders with expertise in supporting migrant workers in developing the detail of a safer new system, including the signatories to this letter.

Kind regards,

**Organisations**

1. Work Rights Centre
2. Immigration Law Practitioners' Association (ILPA)
3. Tulia Group CIC
4. Central England Law Centre
5. Paragon Law
6. Haringey Migrant Support Centre
7. Focus on Labour Exploitation (FLEX)
8. Latitude Law Solicitors
9. WH Solicitors
10. Kanlungan Filipino Consortium
11. Migrante UK
12. Anti Slavery Initiative Oxford (ASIOX)
13. Duhra Solicitors
14. Homecare Workers' Group C.I.C
15. Praxis
16. Jonah Law
17. Migrate UK Ltd
18. Tingley Dalanay
19. McGlashan MacKay Solicitors
20. Sable International
21. Visa Solutions
22. Greater Manchester Immigration Aid Unit
23. Turpin Miller LLP
24. Visa and Migration Ltd
25. Lifeline Options CIC
26. YICS Ltd
27. Biz Immigration Associates Ltd
28. Visa and Immigration UK Ltd
29. Norfolk Community Law Service
30. Kirkpatrick Whyte Limited
31. East European Resource Centre
32. Gills Immigration Law
33. Right to Remain
34. Carter Thomas Solicitors
35. Rebuild East Midlands
36. The3Million
37. Maternity Action
38. Manchester Refugee Support Network
39. Latin American Women's Rights Services (LAWRS)

40. London Citizens Advice
41. Seraphus
42. Advicenow
43. Hansen Palomares
44. Day-Mer, Turkish and Kurdish Community Centre
45. David Fray Solicitors LLP
46. Southeast and East Asian Women's Association
47. SAR London
48. Kalayaan
49. Justice and Care
50. Free Representation Unit
51. Grovelands Immigration Limited
52. Joint Council for the Welfare of Immigrants (JCWI)
53. STOP THE TRAFFIK Kent Group
54. Worker Support Centre

### **Individuals**

1. Tanya Goldfarb, Head of Business Immigration at Bindmans LLP
2. Sandip Basu, Principal at SB Immigration
3. Vishal Makol, Solicitor at Wright Hassall LLP
4. Anna Mulcahy, Immigration Advisor at Praxis
5. Felix Cruden-Smith, Welfare Advisor at Freedom from Torture
6. Krishmeela Rittoo, Immigration Advisor at Praxis
7. Sukhvinder Nara, Owner at NARA Solicitors
8. Adam Pipe, Barrister at No.8 Chambers
9. Bronwen Jones, Barrister at Goldsmith Chambers
10. Brose Joseph Neeliyara, Solicitor at Marie De Louis Solicitors Ltd
11. Stephanie Pote, Senior HR Consultant at MHA MacIntyre Hudson
12. Peter Keenan, Casework volunteer at Kent Refugee Help
13. Amisha Jethwa, Director of Global Immigration Services at Vira International
14. Yayan Grace Qiu, Consultant at Judicium UK Work Permits Limited
15. Nelli Shevchenko, Senior Associate at Sherrards Solicitors LLP
16. Katherine Smith, Immigration Adviser at Redwin Immigration Consultants
17. Lesley Ann Kemp, Solicitor at Helen Smith Immigration Ltd
18. Shazia Yousaf, Partner at Parker Rhodes Hickmotts
19. Dan Doherty, Director & Level 1 IAA Adviser at Five Star (International) Ltd
20. William O'Neill, Partner at Strand Legal Consultancy
21. Phoebe Warren, Trainee Solicitor at Laura Devine Immigration
22. Dhruvi Thakrar, Solicitor and Partner at Keystone Law
23. Lauren Appleby of White Rose Visas
24. Mehreen Khattak, Immigration lawyer at Mulgrave Law
25. Alexandra Kaleniuk, Immigration lawyer at Alexandra Kaleniuk Immigration Consulting Ltd
26. Yasemin Yildirim, Junior Paralegal at Helen Smith Immigration Limited
27. Justin Kouame, Advocacy Officer at Migrant Centre Northern Ireland
28. Ruth Brittle, Lecturer at University of Leicester

29. Stephen Purdy, Immigration Manager at KPMG UK LLP
30. Owen Jones, Partner and Head of Business Immigration at Sheridans Solicitors LLP
31. Kirsty Stewart, Solicitor at Drummond Miller LLP
32. Raj Rayan, Partner at James and Co LLP
33. Emma Okenyi, Solicitor at Paragon Law
34. Ryan Bestford, Solicitor at Greater Manchester Immigration Aid Unit
35. Brother Vaughan, Adviser at Praxis
36. Ariston Ibarondo, Director at ABI Law Associates
37. Frances Shaw, Barrister at No.5 Chambers
38. Kate Ormsby, Solicitor at Greater Manchester Immigration Aid Unit
39. Agim Kamberi, Senior Caseworker at Turpin Miller LLP
40. Emily Heinrich, Senior Solicitor at Wesley Gryk Solicitors LLP
41. Morag Campbell, Paralegal at Wesley Gryk Solicitors
42. Latifah Bailey, Immigration Legal Adviser and Race Equality Officer at The Race Equality Centre
43. Sofia Bassani, Paralegal at Wesley Gryk Solicitors
44. Professor Guild Espeth, University of Liverpool
45. Maria Bateson, Paralegal at Wesley Gryk Solicitors
46. Maja Grundler, Lecturer in Law at Northumbria University
47. Sana Bakhshi, Legal Assistant at Community Integration and Advocacy Centre
48. Chris Magrath, Senior Consultant at Magrath Sheldrick LLP
49. Hester Hill, Trainee Solicitor at Wilson Solicitors LLP
50. Sagar Shah, Solicitor at Derbyshire Law Centre
51. Jo Wilding, Associate Professor of Law at University of Sussex
52. Marcelo Reale, Principal Solicitor at M Reale Solicitors Ltd
53. Imogen Simpson, Solicitor at Wesley Gryk Solicitors LLP
54. Nikita Khodkov, Immigration Adviser at Coventry Street Advisors
55. David Robinson, Partner at RLegal Solicitors
56. Gifty Thomas-Ekweh, Race Discrimination Caseworker at the Race Equality Centre
57. Dr Louise Sweet, Volunteer at Migrant Voice
58. Kim Vowden, Partner at Kingsley Napley LLP
59. Yerivan Al-Jaf, Senior Refugee Resettlement Officer at Islington Council
60. Lorena Leon, Caseworker at Refugee and Migrant Centre
61. Alison Hunter, Partner at Wesley Gryk Solicitors LLP
62. Bilal Ehsan, Partner & Head of Immigration at Howes Percival LLP
63. Eunice Agus, Associate at Forsters LLP
64. Thompson Valerie, Consultant Solicitor at Moore Solicitors
65. Helena Wray, Professor of Migration Law at University of Exeter
66. Yana Tyler, Senior Immigration Adviser at Chan Neill Solicitors LLP
67. Beatrice Windsor, Trainee Solicitor at Wesley Gryk Solicitors LLP
68. Andrew Jones, Solicitor at Wesley Gryk Solicitors LLP
69. Najwa Hassan, Solicitor at The Speakeasy Law Centre
70. Andy Sirel, Legal Director & Partner at JustRight Scotland
71. Abimbola Adeosun, Finance Administrator at Devon and Cornwall Refugee Support (DCRS)
72. Shireen Mathrani, Volunteer adviser at Asylum Welcome

73. Sian Davin, Immigration Solicitor and Immigration Team Manager at Hackney Migrant Centre
74. Angela Kierans, Immigration Adviser at Orchard of Siam
75. Bryony Rest, Partner at David Gray Solicitors LLP
76. Mohammed Amjad, Solicitor at Legal Rights Partnership
77. Colin Yeo, Barrister at Garden Court Chambers
78. Sally Gill, Director of City Community Legal Advice Centre at City Law School
79. Ciera McCartney, Solicitor at Wesley Gryk Solicitors LLP
80. Dmitri Macmillen, Solicitor at Wesley Gryk Solicitors LLP
81. Georgia Rowe, Paralegal at Wesley Gryk Solicitors LLP
82. Gordana Balac, Barrister at Black Antelope Law
83. Emily Cookson, Programme Manager at World Jewish Relief
84. Emma Wilkinson, Director of the Employment Legal Advice Network (ELAN)
85. Adi Sunmola, Consultant at Universe Solicitors