



WORK RIGHTS CENTRE - EVIDENCE SUBMISSION

DIRECTOR OF LABOUR MARKET ENFORCEMENT (DLME) LABOUR MARKET ENFORCEMENT STRATEGY 2024/25 (CALL FOR EVIDENCE)

SEPTEMBER 2023

ABOUT WORK RIGHTS CENTRE

Work Rights Centre is a registered charity dedicated to supporting migrants to access employment justice and improve their social mobility. We do this by providing free and confidential advice in the areas of employment, immigration, and social security, and by mobilising frontline intelligence to address the systemic causes of migrants' inequality. The charity was founded in 2016. Ever since, we have advised over 5,000 people, helped recover over £200,000 in unpaid wages and fees, and supported hundreds more to make job applications and secure their immigration status.

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

CONTACT

For any queries or for further information relating to this submission, please contact research@workrightscentre.org

SECTION 1 - ABOUT US

OUR INTEREST IN THE ENFORCEMENT OF LABOUR MARKET REGULATIONS

As a frontline organisation, the ability of the UK's enforcement agencies to adequately monitor and regulate compliance with key regulations in the labour market is of paramount importance to us. In the course of everyday casework, our Service Provision team interacts with bodies like the Gangmasters and Labour Abuse Authority (GLAA) and HMRC's National Minimum Wage team to resolve the issues clients are facing and to help them get redress for wrongs that they have suffered in the workplace. It is therefore vital that the UK's enforcement agencies are adequately resourced and placed to deal with our clients' issues and to deter non-compliant practices wherever they occur.

CONTACT

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SECTION 2 - FOUR THEMES

IMPROVING THE RADAR PICTURE

1.1. Labour market non-compliance threats (measured by degree of non-compliant behaviour) are greatest in the following sectors: care, agriculture, hand car washes, construction, food processing, which should therefore be the focus of attention for the enforcement bodies.

We broadly agree with this statement. The care and agricultural sectors are of particular concern for us this year, given that both sectors are heavily reliant on migrant workers on employer-sponsored visas. The construction sector is also a high-risk sector, given the prevalence of self-employment and informality.

Agricultural Sector - Seasonal Agricultural Workers

As the DLME will be aware, migrant workers in the agricultural sector, particularly those arriving under the Seasonal Worker (SW) visa, remain at risk of exploitation. Numerous research publications from the Work Rights Centre and from other organisations indicate that the SW visa, as currently designed and structured, does not adequately safeguard the welfare of migrant workers. Workers are often the subject of mistreatment or exploitation on UK farms, including but not limited to:

- Migrant workers being charged fake broker/recruitment fees to access the SW visa by rogue parties during the recruitment process;
- A lack of continuity of employment opportunities, meaning that some workers are told to return to their country of origin because there is no further work available;
- A lack of accessible transfer mechanisms, meaning seasonal workers find it difficult in practice to obtain transfers to other farms where conditions on their existing farm are inadequate or there is insufficient work;
- Reports of underpayment of wages, mainly due to the imposition of piece rates and the under recording of hours on workers' payslips;
- Reports of substandard accommodation on-site, with little regulatory oversight and monitoring from local authorities and/or relevant stakeholders; and
- Allegations of mistreatment, intimidation and bullying, particularly from farm supervisors tasked with monitoring work outputs.

We have written in detail about the different types of exploitation and risk factors for seasonal workers under the scheme in our evidence to the Migration Advisory Committee (MAC) SW visa inquiry, which can be found [here](#).

The care sector

We are also concerned about worker exploitation in the care sector. The Skilled Worker - Health and Care visa (the 'Health and Care visa') was introduced in August 2020, allowing medical professionals to come or stay in the UK to work with the NHS, an NHS supplier, or in adult social care¹. In December 2021 the visa was expanded to allow care workers, care assistants and home care workers eligible for a 12-month period.²

Accordingly, the number of Health and Care visas issued in recent years has risen dramatically, increasing substantially every quarter.³ In 2022 alone, 76,938 Health and Care visas were issued to main applicants under the route.⁴ In Q1 of 2023, 37,043 visas were issued to main applicants, in comparison to 12,411 visas issued in Q1 of 2022.⁵ The top 5 nationalities represented on the Health and Care visa have historically been India, Nigeria, Zimbabwe, Ghana and Philippines.⁶ The number of visas issued to main applicants from India, Nigeria and Zimbabwe has increased exponentially over the last few years, with the table below outlining this trend:⁷

Nationality	Visas granted to main applicants for year ending March 2022	Visas granted to main applicants for year ending March 2023	Change	Percentage change
India	14,485	29,726	+15,241	+105%
Nigeria	5,009	17,596	+12,587	+251%
Zimbabwe	2,630	17,421	14,791	+562%

At the same time, reports of exploitation in the care sector have been increasing substantially. The GLAA's Intelligence Picture for Q1 of 2023 identified that 'Care Home/Social Care' was the top sector for reports concerning modern slavery and/or human trafficking (MSHT) for labour exploitation with 23 cases, an increase of 11 from Q4 of 2022.⁸ The sector accounted for 26% of all MSHT reports in Q1 of 2023. The GLAA also identified that:⁹

- The top victim nationality was Indian;
- The most common means of exploitation was inadequate pay followed by workers paying inflated fees;
- MSHT cases were recorded across the UK, with no clear geographical clustering;
- In 43% of cases where accommodation for victims was provided by their exploiter, it was substandard;
- The methods of recruitment into the care sector remain a 'large intelligence gap' for the GLAA; and

- 50% of all cases involving a recruitment agency in the supply of the potential victim were cases linked to the care sector. Agencies were involved in facilitating exploitation through inadequate pay, inflating fees and threats to cancel sponsorship.

These trends have broadly continued in the GLAA's Intelligence Picture for Q2 of 2023, and the care sector continues to be the sector experiencing the most MSHT reports. The addition of long hours and debt bondage as the most common types of exploitation experienced by care workers is another notable change, as is the GLAA's prioritisation of the sector via its work on Operation Topaz.¹⁰

The Modern Slavery & Exploitation Helpline has also seen a substantial rise in cases from the care sector. In 2021, the helpline identified 15 cases of labour exploitation in the sector indicating 63 potential victims, but by 2022, it had identified 106 cases indicating 708 potential victims. This represents a worrying tenfold rise in victims in just the space of a single year.¹¹ The care sector was also the second highest in terms of annual case and victims indicated, topped only by the service sector. Indian victims for the year were predominantly indicated within the care sector (147 out of 219 victims). Similarly, 90% of all Zimbabwean victims indicated for the year were operating in the care sector. Nigerian victims were also indicated for the first time in labour exploitation cases, predominantly in the care sector (25 out of 39 victims).¹² More recently, the helpline has identified that the number of cases reported in the care sector between January and March 2023 was twice as many as the same period in 2022.
¹³

Trade unions have also identified the underlying precarity in the care sector for migrant workers arriving under the Health and Care visa. For example, on 10 July 2023, UNISON published a press release in which it identified that migrant workers coming to work in social care in the UK were being *'forced to pay back thousands of pounds in fees, housed in substandard accommodation and even forced to share beds with colleagues'*.¹⁴ UNISON have written to the Minister of State for Social Care, Helen Whatley MP, regarding the issue, stating that the government *'has a responsibility to intervene'* to prevent exploitation that migrant workers are facing.¹⁵

Since its inception in 2016, the Work Rights Centre's Service Provision team has dealt with 107 employment rights cases where beneficiaries have been working in the care sector. These cases constitute 3.3% of our total employment rights caseload, though we believe this is linked to the lack of pre-existing links with communities disproportionately affected by issues under the visa route. Notably, early indications suggest that caseload from the sector will continue to rise quickly. For example, in 2022, our Service Provision team dealt with 14 cases in the care sector. In the first 7 months of 2023 however, our Service Provision team had already dealt with 13 cases. Given current labour shortages in the UK's care sector, we expect this trend to continue.

The means of exploitation in the care sector we have observed are varied, though it is clear that the sponsorship system used by employers/sponsors is being abused. It is common for

workers to be recruited via agencies operating in the UK, where workers are forced to pay exorbitant fees (thousands of pounds) for fake broker/administrative/processing fees. Workers are also exploited on arrival - we have seen incidents of workers being forced to work continuous shifts without a break, being forced to drive without a full driving licence (to travel between consecutive shifts) and underpayment of wages. Workers are generally not aware of their rights or their ability to switch employers under the Health and Care visa. It is common for employers/sponsors to threaten to report individuals to the Home Office or simply withdraw their sponsorship (even where the worker has done nothing wrong), so employees tend to comply with exorbitant demands placed on them, particularly lengthy working hours.

We are also concerned about the use of repayment clauses which are being used by some employers in the care sector to trap workers into exploitative conditions. For example, we have observed care workers who wished to leave their employment a few months into their role, often after suffering non-compliance at the hands of their employer, but were prevented from doing so because a repayment clause in their employment contract stated that they would be liable to repay their employer for costs incurred as a result of their recruitment and position e.g. training costs. These costs are often substantial (thousands of pounds) and in some cases are vague/not particularised in the contract. Migrant workers, who have already paid substantial sums for their visa and in getting to the UK, cannot afford to repay these costs up front, so they are left with a choice - leave, but with the caveat that the employer will recover the money some other way (often by withholding recent wages and notice pay) or, more commonly chosen by workers, stay in that employment because they can't afford either one of losing out on previously earned income or paying the repayment costs upfront.

The current law on repayment clauses is complex, but a clause will generally not be considered a penalty clause (i.e. unlawful) if it protects the legitimate interests of the employer and the sum to be repaid on breach is not extravagant, unconscionable, exorbitant or incommensurate with those legitimate interests. The current position is therefore stacked against migrant workers who will find it difficult to demonstrate that a particular repayment clause does not meet this legal test, particularly without engaging in drawn out litigation and fact-finding exercises. Because the current position favours employers, we are worried that some employers in the sector may use this to instigate bogus or unnecessary training for care workers in a bid to purposely trap them into exploitative employment. Though this is a trend that we are investigating, reforming the law and guidance around the legality of repayment clauses in this context appears to be of increasing importance.

The construction sector

By way of background and much like the other sectors referenced in this statement 1.1. the construction sector has experienced labour shortages which has forced the government to intervene. In response to the MAC's expedited review of the Shortage Occupation List (SOL) for the construction and hospitality sectors¹⁶, the government added bricklayers, masons, roofers, roof tilers, slaters, carpenters, joiners, plasterers and construction and building trades to the SOL in July 2023¹⁷. As the MAC has pointed out, in a sector that has not used the Skilled Worker route routinely since its introduction, it remains to be seen whether these changes will

cause an increase in the number of migrant construction workers coming to the UK from overseas, though these changes at least open the door to that possibility.

Construction remains both an important source of employment and a potential risk sector to migrant workers. For example, in the GLAA's Intelligence Picture for Q1 of 2023, construction was the third most commonly reported sector for MSHT, accounting for 7% of total reports.¹⁸ The GLAA also found that:¹⁹

- Most victims were described as Eastern European;
- The most common type of exploitation was long working hours followed by poor accommodation and a reliance on the exploiter for work, transport and accommodation; and
- The method of recruitment for workers in the construction sector remains '*a large intelligence gap*'.

In its report for Q2, construction has slipped to the fourth most commonly reported sector for MSHT²⁰ though we anticipate that construction will remain a focus area moving forward.

Statistics from the Modern Slavery and Exploitation Helpline also indicate that the construction sector should remain a strategic priority for the UK's enforcement agencies. In 2021, construction was the sector with the highest recorded instances of labour exploitation, with 92 cases and 338 potential victims identified. Though by 2022 the construction sector had been overtaken by the care and service sectors, the construction sector still saw a 53% increase in cases (141) and a 35% increase in potential victims (to 543).²¹

The former Independent Anti-Slavery Commissioner, Dame Sara Thornton, has previously commented on the difficulties facing businesses in the construction sector when attempting to effectively support workers and battle non-compliance in supply chains, noting that these challenges underline '*the pressing need for government to provide more guidance and leadership across the spectrum of issues*'.²²

Since its inception in 2016, the Work Rights Centre's Service Provision team has dealt with 547 employment rights cases from workers in the construction sector. Where the relevant client sector is known or has been reported, cases in the construction sector have constituted more than 25% of our total employment rights caseload to date, making it the most commonly reported sector in which our employment rights clients operate. Though construction was not the most commonly reported employment rights client sector in 2021 and 2022 (beaten instead by clients working in the cleaning industry), we believe it remains of ongoing relevance in the context of labour exploitation and non-compliance in the workplace.

Though our team has historically observed a wide variety of exploitation in the construction sector, nearly 68% of all cases have revolved around the issue of non-payment. This includes circumstances where there have been alleged deductions from wages and workers being paid at rates below the National Minimum Wage. The issue has been particularly prevalent for those workers who were self-employed and had not been paid for their services. Other issues

reported less frequently have focused on contract terms, unclear employment status and problems around dismissal.

Other sectors

Our impact statistics in 2022 indicated that migrant workers who sought advice for employment rights issues came from a wide variety of sectors. The top six sectors were as follows:

- Cleaning - 20%
- Construction - 18%
- Hospitality sector - 13%
- Agriculture - 10%
- Delivery - 5%
- Care - 5%

As of July 2023, the most cited sectors among beneficiaries this year have been:

- Construction - 26%
- Cleaning - 13%
- Hospitality - 11%
- Delivery – 6%
- Services – 6%

1.2. Some groups of workers (for example, women, younger people, migrants, those with protected characteristics) are at higher risk of experiencing labour market non-compliance than others.

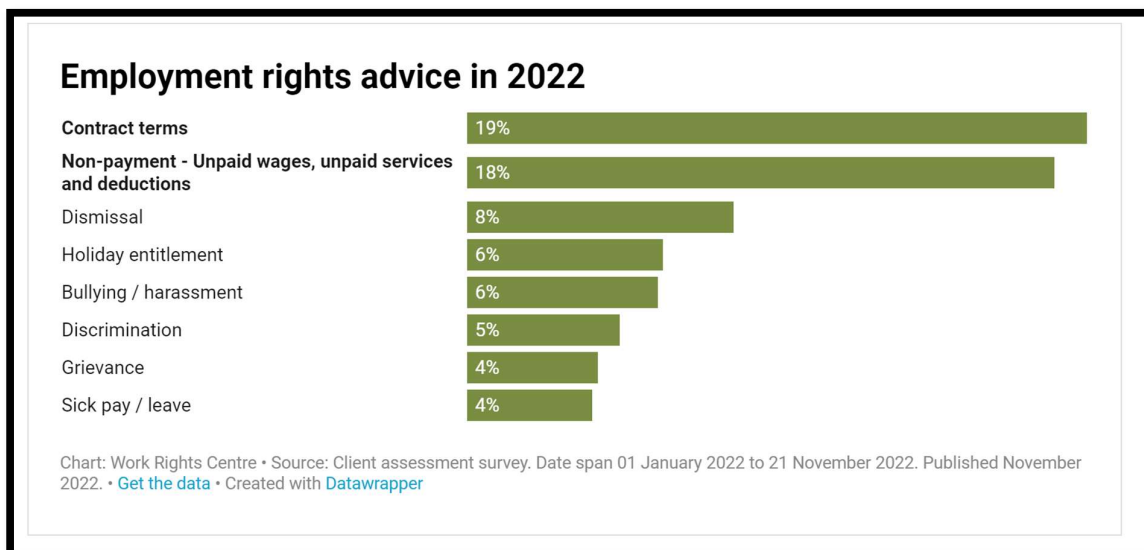
As a frontline organisation that assists mostly migrant workers, we strongly agree with this statement. Our impact statistics suggest that migrant workers are particularly at risk of experiencing labour market non-compliance. In 2022, we supported 313 migrant workers who experienced an employment rights breach. As many as 35% of them did not have written terms of engagement or a signed employment contract in place at their workplace, and 22% did not regularly receive a written confirmation of payment for the work that they had conducted, either through a payslip or through an invoice.²³

A lack of formality in our clients' working arrangements is very much a precursor to potential exploitation later on down the line. Almost one in five (19%) of the people who needed our employment rights support in 2022 were experiencing difficulties in understanding their contractual entitlements, and a similar number (18%) reported an issue of non-payment. Disputes around holiday entitlement and sick pay/leave entitlement were the third most common employment rights issue, reported to the Work Rights Centre by 10% of employment clients.²⁴ For workers in flexible zero hours positions, where rotas varied substantially from one week to the other, the calculation of time off and pay was particularly confusing, leading to disputes and an erosion of rights. We anticipate that the reforms proposed as part of the

government's Retained EU Law bill concerning employers no longer being obligated to record working hours is also going to be problematic in some of these same cases moving forward.

The risk of experiencing labour non-compliance is compounded by factors at individual level, such as migrant workers' modest levels of English and IT literacy, their poor support networks and financial difficulties. It is also exacerbated by inadequate resourcing of the employment justice system.

The employment tribunal is becoming increasingly inaccessible as a way for workers to seek justice because of delays in receipts of claims/hearings and issues with enforcing awards. Similarly, the UK's labour enforcement agencies are severely under-resourced, with just 0.3 inspectors per 100,000 workers, barely a third of the standard recommended by the ILO.²⁵



Intersectionality is important when we examine the profile of labour exploitation. Migrant workers are not a homogenous group, defined merely by their country of birth. Being subject to immigration controls is also experienced differently in intersections with gender, age, income, different levels of education and physical ability, which exacerbate their risk of exploitation in different ways. We are particularly concerned by gender disparities. The average pay of clients who identified as female was £1,360 a month, substantially lower than the average pay of men, which stood at £1,910 a month. While these figures may reflect differences in the number of hours our clients worked, or the industries in which they were working, low pay can make it particularly difficult for women to take action against their employers.

Finally, we are concerned about labour market non-compliance that might be experienced by students. In April 2023, Middlesex University released an interim report exploring the nature of work undertaken by students during their studies. It found that:

- The majority of students work in the low-wage and low-skilled sectors and earn less than minimum wage;
- 68% stated that their work schedule is changed at short notice;
- 28.5% do not always or ever see a payslip;
- 22.5% of respondents complained about unpaid extra work;
- 17.34% claim that some of their wages are paid cash in hand to avoid taxation;
- 50% believe they are not entitled to paid maternity leave;
- Nearly 30% claimed experiencing discrimination at work, with 10% experiencing it frequently; and
- 24%, 22% and 12% of respondents reported experiencing bullying, threats of dismissal or disciplinary action.²⁶

1.3. Jobseekers are increasingly using non-traditional means to find work (for example, online or via apps, social media) placing them at greater risk of fraud and scams.

We agree with this statement, particularly in respect of the recruitment methods employed for migrant workers, where the practice of finding work through word of mouth or other non-regulated channels is prevalent.

Following the UK's departure from the European Union and changes in the immigration rules requiring EEA and Swiss nationals to have a visa in order to work in the UK, the composition of incoming migrant labour to the UK is changing rapidly. UK companies are now recruiting further afield, with more non-EU nationals entering the labour market. According to statistics published by the Office for National Statistics in May 2023, the number of non-EU nationals working in the UK was 17% higher than a year earlier, while the EU workforce in the UK was only up by 2%. As to individual countries, Indian nationals represented one third of all grants under work visas and were far and away the top nationality under both the Skilled Worker visa and the Health and Care visa. Other nationalities that saw an exponential rise in the work orientated visa categories include the Philippines, Nigeria, Zimbabwe, Ghana, Kyrgyzstan and Uzbekistan.²⁷

These figures are important because, in the experience of our service provision team, there is now a distinct risk of non-EU nationals being subjected to fraud or scams, particularly during the recruitment process. In summary, it appears to us that the higher the pay disparity between workers' countries of origin and the UK seems to be, and the more novel the opportunity to work in the UK is, the higher the risk that rogue intermediary agents will capitalise on this opportunity, charging fake administration and recruitment fees.

For example, in recent cases involving the care sector, we were aware of migrant care workers being allegedly recruited informally with the assistance of local colleagues, friends and family members. Others were allegedly contacted directly by recruiters in the UK (of the same nationality) who instigated the recruitment process. These individuals were required to pay thousands of pounds in fees to 'secure' their visa as part of the process, but it wasn't clear

how these fees were broken down or what they were actually for. A similar phenomenon can be observed in relation to migrant seasonal workers arriving in the UK under the SW visa. Though the charging of fake and illegal broker/recruitment fees has been reported for some time now, the practice is still relatively commonplace in source countries. For example, as our [submission to the MAC on the SW visa](#) indicates, earlier this year one Central Asian client was charged \$5,000 in recruitment fees by a rogue individual operating out of Russia. After a few months in the UK, that client's friends informed him that the individual was now charging \$12,000 to arrange SW visas for Central Asian workers.

There is a significant amount of disinformation that is being propagated online that is likely exacerbating the issue. For example, many migrant workers use direct messaging apps that are popular locally to communicate (e.g. Telegram in many Central Asian countries) and these are sometimes the place where the scams are facilitated. In relation to the SW visa, we have seen examples of rogue actors pretending to be licensed scheme operators by copying information, logos and imagery from the operators' websites, which can be incredibly misleading for workers. At a more basic level, there is a plethora of misinformation advertised online about work in the UK. To highlight the extent of this, we have included just a few screenshots below which are taken from the thumbnails of YouTube videos when searching for 'UK seasonal work visa':



UK Agricultural Jobs With Visa Sponsorship 2023: Fruit Picking,...
3.4K views · 13 days ago
Traveller
ukvisa #ukagriculture #ukvisasponsorship UK Agric
With Visa Sponsorship 2023: Fruit Picking, Seasonal



APPLY NOW for UK Farm Worker Jobs | 55,000 Free Visa...
7.5K views · 1 month ago
Nurse Melvis
APPLY NOW for UK Unskilled Worker, Farm Worker
Free Visa SPONSORSHIP, Approved by the Gov't for



Aside from the fact that none of the information above comes from an official source, an operator etc., the information listed is full of inaccuracies. Migrant seasonal workers in the UK do not have salaries of £57,000, accommodation is not free (because rent via the Accommodation Offset is deducted through workers' payslips), the visa and tickets to come to the UK are not free and there is an age requirement (i.e. workers have to be 18 or over). At the very least, this makes understanding the recruitment process very confusing and, at worst, it can encourage prospective workers to put their faith in rogue third-party agents claiming to be 'legitimate' or 'in the know'.

This is a real area of priority and urgent action must be taken by the GLAA in particular to mitigate against exploitation through recruitment processes. Indeed, the GLAA's own Intelligence Picture for January – March 2023 indicates that the '*recruitment method of victims remains an extremely large intelligence gap for the GLAA*'. In Q1 of 2023, the method of recruitment was only known in 3% of cases. Where the method of recruitment was known, trafficking, recruitment via a friend or Facebook was common.²⁸

In our efforts to tackle some of the most common scams affecting workers, we have assisted the University of Sheffield by providing some examples of fraudulent/risky job adverts spotted by our Service Provision team, which will be used in the University's project to develop an Artificial Intelligence (AI) tool that can assist in identifying deceptive job adverts that could lead to forced labour. We have also introduced the project team to the office of the DLME in a bid to increase collaboration in this area. However, without further wide-ranging action the UK labour enforcement agencies will likely continue to play catch-up for years to come. In our view, in order to dismantle the vast and lucrative market of private local agents abroad, the GLAA should also consider the possibility of creating legitimate and visible recruitment channels, partnering with the relevant government agencies in workers' countries of origin.

1.4. Ongoing labour shortages in some sectors are not translating into improved conditions for workers in those sectors.

We agree with this statement.

We understand that the UK's tight labour market and labour shortages have been driving wage growth in different sectors, as well as the National Minimum Wage (NMW)/National Living Wage (NLW) rates which were lifted in April of this year. However, a significant proportion of our client-base who tend to be lower-paid migrant workers in precarious roles are unlikely to feel the benefits of these rises. Some workers are not being paid according to hourly rates (i.e. being paid according to productivity or day rates, which may involve them working excessively long hours such that their hourly wage is lowered). In other cases, the cost of living and inflation is eating into wage increases, with many of our clients having entered into council tax or utility debts over the last year.

On the topic of the NLW, the Low Pay Commission's report on the NMW in 2022 identified that, despite increases to the NLW, workers in low-paying sectors were experiencing increased work intensification. Examples mentioned in the report include workers being given additional responsibilities but remaining on the same rates of pay, workers being asked to pay for their own training and accommodation and the waiver of rights under the Working Time Directive becoming more common.²⁹ Additionally, despite a tight labour market in the UK, the Low Pay Commission also found in 2022 that the number of underpaid workers (i.e. the number of workers who appear to be being paid below the legal minimum) increased by 100,000 in comparison to 2019. Underpayment as a share of coverage has also increased since 2019.³⁰

Similarly, an analysis of our case data since the beginning of 2022 suggests that precarious work indicators remain present for our clients working in sectors that have been previously identified by the DLME as high risk. Please see below for a summary:

Table summarising precarious work indicators for Work Rights Centre employment rights cases between 1 January 2022 and 13 July 2023

Sector	Had written terms of work? (i.e. a contract)	Written evidence of pay (i.e. payslips or invoices)?	Regular work schedule?
Agriculture	8% did not have written terms of their work	9% had no written evidence of their pay	17% did not have a regular work schedule
Care	14% did not have written terms of their work	10% had no written evidence of their pay	24% did not have a regular work schedule

Cleaning	34% did not have written terms of their work	8% had no written evidence of their pay	13% did not have a regular work schedule
Construction	68% did not have written terms of their work	47% had no written evidence of their pay	34% did not have a regular work schedule
Delivery	19%% did not have written terms of their work	8% had no written evidence of their pay	24% did not have a regular work schedule
Hospitality	27% did not have written terms of their work	19% had no written evidence of their pay	38% did not have a regular work schedule

IMPROVING FOCUS AND EFFECTIVENESS

2.1. Workers and employers are sufficiently aware of employment rights and know where to go for help.

We disagree with this statement. In 2022, 13% of our clients who sought employment rights advice did not know their employment status or were not sure about it. While 86% self-reported as knowing their employment status, we believe there is much work still to be done to communicate to migrant workers what rights flow from their status. Research by Middlesex University indicates that the majority of working students do not know much about labour rights and that a lack of knowledge of employment rights is one of the main reasons for abusive employment relationships and the precariousness of students in the workplace.³¹

Knowledge of employment rights is just as important as the ability to enforce them once they are breached. In our experience of advising migrant workers, even those without a sophisticated understanding of their rights in the UK are naturally able to detect unfairness at some level. Often there is a tipping point or succession of tipping points that can indicate to the worker that something is wrong. However, what makes their lives difficult is the mechanics and procedures for enforcing those rights. More awareness raising can cover some topics, like the importance of understanding employment status, the fact that this is determined based on practice, the importance of right to work checks for everyone (and not just those perceived to be migrants). But beyond this, the resourcing of the UK's enforcement agencies and the advisory capacity of, in particular, the third sector, are matters that need to be taken more seriously if we are to ensure that workers can practically ascertain their rights.

2.2. Workers have confidence in the three enforcement bodies that their cases are being dealt with proactively.

As an organisation representing the interests of migrant workers, we are concerned about the capacity of the enforcement bodies to deal with cases 'proactively'. It is important to acknowledge that proactivity is not merely about prevention efforts and communications campaigns (something we have seen both the GLAA and the HMRC NMW team initiate), but also about enforcement, the actual investigations that lead to justice for workers, and sanctions for rogue employers. This is where, in our view, the agencies are falling behind.

In our experience, contacting labour enforcement agencies is confusing (given the well-documented fragmentation of the UK's labour enforcement ecosystem and the lack of clarity over different agencies' remits), non-transparent (notably, workers are not told when they'll hear back from investigators, and what support they may expect through the investigation process), and slow (with reports taking weeks to be acknowledged).

We are particularly concerned by the reluctance of the HMRC NMW team to institute a channel of communication and cooperation with third sector organisations which support vulnerable migrant workers. This is of crucial importance for workers who were victims of modern slavery, and who may have difficulties gathering and presenting the evidence required by investigators. In one of our cases, the HMRC's reluctance to consider the evidence collected by our caseworkers, and the insistence upon placing excessive emphasis on the evidence shared directly by a vulnerable worker who had a history of substance misuse and difficulties communicating, was a missed opportunity to collect valuable information on a criminal employer. The absence of a channel of intelligence sharing also delayed the process, and ultimately put an already vulnerable worker under further financial and psychological stress. Tragically, while the HMRC was investigating the case, the worker committed suicide (see Case Study #2 below).

Cooperation with third sector agencies, transparency in the investigation process, the institution of a standard of care for workers, and the adoption of policies for handling vulnerable workers is, in our view, what it takes to build a truly proactive enforcement system.

In the case of migrant seasonal workers, taking swift action to prevent exploitation in the recruitment process is of particular importance given that applications to the UK's SW visa are made on an ongoing basis and the supply of labour is particularly pressing in the summer months (during picking season). Any delay, not least due to staffing and issues around capacity, presents a risk of further exploitation. Incidents like the above only serve as a reminder that the UK's enforcement bodies require further capacity and funding to deal with the scale of non-compliance presently affecting the UK's labour market.

We believe that the recent anecdote below, involving the GLAA, emphasises this issue and the need for additional resourcing amongst the UK's enforcement bodies:

DELAY AT THE GLAA – CASE STUDY #1

On 21 June 2023, we made a report to the intelligence address at the GLAA about one individual and one UK registered company that we suspected had exploited and were continuing to look to exploit prospective seasonal workers from overseas under the SW visa (in the cases we saw, from Tajikistan specifically).

In the cases that were brought to our attention, we were made aware that seasonal workers had been made to sign contracts by the individual/company, under which workers were obliged to pay hundreds of pounds for 'assistance in seeking employment abroad'. We were informed that the workers in question did not know who their operator would be and did not know what a licensed scheme operator was in the first place. There was no evidence to suggest that either the individual or company in question was connected to any of the licensed scheme operators under the SW visa.

When reporting this matter to the GLAA, we attached the contracts in question (which appeared to be drafted in a deliberately confusing way and containing inaccuracies) and we also provided the names of the individual/company and all relevant information that was publicly available (i.e. through Companies House records and documentation) in a bid to save precious investigative time. However, after a month (and only after we chased the GLAA for an update on the matter), the GLAA responded to let us know that they were 'currently working through a large back log of reports and emails due to staffing issues'.

2.3. Compliance and enforcement interventions by the three bodies are helping to ensure a level playing field for business.

We have not provided evidence in response to this statement.

2.4. Current enforcement penalties (for example, financial, reputational) deter more serious labour market exploitation.

At the present time, we disagree with this statement.

The Resolution Foundation has conducted important research into this area, revealing that financial penalties are currently too low to act as a meaningful deterrent to rogue actors in the labour market. The example that is given in their report 'Enforce for Good' focuses on penalties where a firm is found to have underpaid a worker the National Minimum Wage. The report notes that in these cases, the penalty imposed is either equivalent to the sum of arrears in the

first instance and double the arrears in the event of there being a late payment. The level of penalty imposed as against the level of arrears is lower than the UK's international partners, including France, Ireland, Netherlands, Australia and Norway. Analysis by the Foundation suggests that the current penalty level in the NMW context would have to be accompanied by a detection rate of 1 in 3 for it to act as a meaningful deterrent to firms considering underpaying their workers. Given the lack of additional resourcing that the UK's main enforcement bodies have suffered from in recent years (which is likely to continue at least in the short term), firms are unlikely to be deterred as the risk of being caught is too low.³²

There is also a cultural change that is required in the context of the imposition of penalties. As the Resolution Foundation have also noted, despite the fact that the majority of firms will want to comply with relevant legislation, this starting point also affects how the enforcement bodies engage when non-compliance is discovered. By way of support, it cites the fact that HMRC's National Minimum Wage Unit and the Pensions Regulator issued some form of penalty in 41% and 39% cases of non-compliance respectively.³³ The most damning aspect of this phenomenon of leniency in labour market enforcement is that it is not replicated in other areas where businesses or employers have serious legal responsibilities. The two most obvious examples in this context include laws on taxation and, importantly, right to work check responsibilities under the guise of the UK's immigration framework (which we of course note is hostile to migrant communities).

And, although we are concerned with smaller employers who are exploiting groups of migrant workers, it is perhaps more concerning that larger and more reputable employers are falling foul of such regulations. For example, in the latest NMW 'naming and shaming list', WH Smith, Argos and Lloyds Pharmacy alone were found to have underpaid nearly £2.5m to over 30,000 workers in breach of NMW legislation.³⁴ Though these firms were given penalties, a general leniency in approach on behalf of the labour market enforcement bodies does little to improve the perception that deterring non-compliance in the labour market is considered seriously or at least *as seriously* as other policy objectives. This is key, as we believe that a strong UK labour market also necessitates an environment where workers' rights are upheld and enforced robustly too.

2.5. The enforcement bodies have a difficult job prioritising their resources but, on balance are addressing the right issues.

Our review of the UK enforcement bodies' annual reports indicates that these agencies have identified key priorities in tackling labour exploitation, including by highlighting high risk sectors where there has been a fluctuation in labour. This includes the agricultural, care, distribution and retail sectors.

However, our concern remains in the implementation of the enforcement bodies' activities and the extent to which they are currently set up to be successful in tackling the key issues facing workers. At the GLAA, the process for reporting potential instances of labour

exploitation can be frustrating as it is unclear how information is acted on, what timelines are in place for reviewing information and what standard of care both clients and reporting organisations on behalf of clients will receive. Case study #1 above is a recent example of how this continues to persist, even where information reported is more clear-cut. The DLME has previously noted that the GLAA has had a significant increase in the level of intelligence that is reported to them in the past three years which impacts on resources. For example, in 2018/19 they received 2,750 referrals, 21% of which actually resulted in an investigation or was linked to an existing case.³⁵

As a frontline organisation assisting migrant workers, we would like to see more explicit recognition and consideration on how labour exploitation is playing out for migrant communities. For example, in the latest annual reports of the GLAA, EAS and government evidence on the enforcement of the National Living Wage, the word 'migrant' features only once (in the GLAA annual report, and even that is a reference to the contents of a presentation delivered by the Nottingham Rights Lab). Given that migrant workers feature heavily in the top sectors the GLAA is known to be targeting as areas of priority, their almost complete absence from this strategic document is puzzling. Similarly, it would make sense to refine the GLAA's reporting of performance measures in relation to the support that workers receive. We note that in the latest annual report the GLAA admitted that they had been unable to evaluate the support received by victims from third parties beyond the NRM. We welcome this as an area of improvement but would also recommend adding the amount of money recovered for workers as a separate performance indicator, particularly given the historically low number of cases led by the GLAA that have been referred to the Crown Prosecution Service.³⁶

As alluded to in our response to statement 2.4, we believe that there is currently too much leniency and reliance on the private sector to *'do the right thing'*. Similarly, the reliance on intelligence reports and triaging is of importance, but we believe there is scope for further proactive work, should the enforcement bodies be resourced properly. Indeed, the GLAA's latest annual report indicates that the agency identified fewer victims than the previous year due to the reduction in compliance inspections that had been carried out.³⁷

Finally, in respect of the EAS, we would like to see greater visibility and engagement with organisations in the third sector in shaping and driving the agency's strategic approach. Historically, we have had far greater interaction with the GLAA and HMRC's NMW team when reporting non-compliance than the EAS. However, employment agencies and businesses are of growing concern to us, particularly in the care sector given the growing reports of exploitation that appear to be regularly facilitated by employment agents.

BETTER JOINED UP THINKING

3.1. Coordinated enforcement actions by the enforcement bodies are helping to achieve a more compliant labour market.

Our oversight of coordination between the enforcement bodies is limited, hampering our ability to provide an opinion on this precise statement. However, in the DLME's latest annual report, we note that *'there is better sharing of intelligence between the three enforcement bodies, but joint working has been the exception rather than the rule'*.³⁸ Where we would like to see greater coordination by the enforcement bodies is in relation to the National Referral Mechanism (NRM) and the redress that workers get in positive referrals. Putting aside recent changes brought about by the Illegal Migration Bill, it is our experience that while successful referrals into the NRM get protection from removal, they get far less assistance in asserting their employment rights. We would encourage the enforcement agencies to therefore be more transparent, more mindful of workers who are in particularly vulnerable circumstances and to be more cooperative with the organisations that support them. The tragic case study below indicates how mere referral into the NRM brought the client no closer to justice:

CASE STUDY #2

In one of the cases supported by our frontline service provision team, we learnt that an EU national who had been accepted into the NRM and had been living in a safe house for months, had nonetheless received no support in recovering more than a year's worth of unpaid wages. These wages came to a large enough sum to change their life. However, neither the people responsible with managing their case under the NRM, nor the HMRC's NMW investigation team (whom we contacted) were able to adequately support them with wage recovery. In particular, the former were simply unaware of the process by which the client could attempt to recover the sums that were owed to them. The latter were woefully equipped to support a vulnerable migrant who, understandably, suffered from trauma and was struggling with their mental health. Tragically, by the time HMRC were able to respond, the client took their own life.

3.2. Cross-government working has been effective in tackling labour exploitation in high-risk sectors (for example, care, hand car washes, agriculture, construction)

We are unable to comment substantively on the efficacy of cross-government working in this context. However, some recent evidence suggests that the involvement of multiple government departments and agencies can actually result in the dilution of efforts to tackle labour exploitation and the welfare concerns of workers.

AGRICULTURE

For example, in December 2022, the Independent Chief Inspector of Borders and Immigration (ICIBI) released a report looking at the immigration system as it relates to the agricultural sector in the UK. In it, the ICIBI noted in relation to the SW scheme:³⁹

'The inspection did not provide a clear picture as to how responsibilities were divided across the Home Office, other government departments, devolved administrations or local authorities. Inspectors also received contradictory information about the distribution of responsibilities from Home Office staff and other government departments.'

In addition, different entities had different understandings of their responsibilities in relation to the scheme. For example, the GLAA remarked that its responsibilities were 'very different' from the Home Office, while the Health and Safety Executive described its role as being 'quite separate' from Home Office responsibilities. The ICIBI noted that at present, the Home Office is 'not able' to assure itself that scheme operators are upholding the various requirements placed upon them, whether or not it considers that some aspects should also be the responsibility of another party.⁴⁰

CARE SECTOR

It remains to be seen how effective cross-government working to prevent labour exploitation will be in the care sector. We understand that the GLAA is currently working with the Care Quality Commission to try to prevent exploitation from happening.⁴¹ From our perspective and given the issues relating to the dilution of responsibilities mentioned above, it is vital for affected workers to know who they can contact when exploitation happens. This might be an area that would benefit in particular from the introduction of a Single Enforcement Body (SEB).

HAND CAR WASHES

It is hard to see how 'cross-government working' has resolved issues pertaining to labour exploitation in the hand car wash sector. In May 2023, the UK Car Wash Association expressed its disappointment over the government's failure to tackle cases of modern slavery in the hand car wash sector, despite being 'tireless in its attempts to persuade the Government to act'. It noted that in 2022, the Modern Slavery and Exploitation Helpline had recorded 160 cases of labour exploitation in the sector, affecting 553 victims and constituting 15% of all labour exploitation cases in the year.⁴² Similarly, on 11 July 2023, the Clewer Initiative reported new data from its Safe Car Wash App, indicating that a third of reports submitted through the app from January to June 2023 met or exceeded the threshold of concern for modern slavery and exploitation.⁴³

Licensing in the hand car wash sector is still an issue. Though there are a number of voluntary schemes where car washes are required to comply with standards to receive accreditation, calls for a mandatory national licensing scheme to be introduced have continued to be rebuffed. Most recently, at a session of PMQs on 3 May 2023, Gary Sambrook MP asked the Prime Minister Rishi Sunak whether the government would implement a mandatory scheme to protect workers. Though the Prime Minister acknowledged that the government were

tackling labour exploitation in the labour market, he stopped short of endorsing a mandatory scheme, instead stating that the government would '*continue to keep the position of hand car washes under close review*'.⁴⁴

In order to facilitate the sort of cross-government working envisaged by statement 3.2., it is vital that urgent progress is made to consolidate the UK's three enforcement bodies into an SEB. It is disappointing that the government has dropped its pledge to introduce a SEB within this parliamentary session. This means that we may not see an SEB come into fruition until 2025 or beyond, given the work that will need to be undertaken to plan for the consolidation that this policy proposal would require. Given this and the fact that previous DLME reports have identified the pressing need for an SEB, we anticipate and hope that the DLME will reiterate the urgency with which this change is needed.

IMPROVING ENGAGEMENT AND SUPPORT

4.1. Failure to provide detailed, timely, physical, and accessible payslips can leave workers vulnerable to exploitation.

We agree with this statement.

Looking at our client data for 2022, as many as one in five (21.6%) of clients who approached us with an employment rights issue reported lacking written confirmation of payment. Previous research has identified that this is an area of persistent non-compliance. The Resolution Foundation's analysis of ONS Labour Force Survey statistics indicate that in 2019/20, around 7% of employees, or around 1.8million people, did not get a payslip. There is also slight variance in where the lack of payslips is a more prevalent issue. For example, 19% of workers in agriculture reported not getting a payslip (a sector that we note is often populated with migrant labour), while 14% of workers in firms with fewer than 20 workers did not receive a payslip either.

Naturally, being provided with regular and physically accessible payslips is of fundamental importance to migrant workers, so they are able to work out whether they are being paid correctly for the work they have carried out, and whether their employer is also keeping up with tax and pension related obligations. Payslips are also important in allowing migrant workers to pursue rogue employers for exploitative practices – both in helping to substantiate the employer-employee relationship but also in evidencing non-compliance in the form of underpayments.

4.2. Key Information Documents (KIDs) are providing those workers entitled to receive them all the information they need in relation to their employment.

We neither disagree nor agree with this statement. However, as stated above, 35% of our clients in 2022 did not have written terms of engagement or a signed contract in place. In our view, it is the job of labour enforcement agencies to provide information and take action when information is not provided in these circumstances, and where workers are actively prevented from asserting their rights.

4.3. Lack of contractual clarity around employment status can put people at greater risk of exploitation.

We agree with this statement.

It is well established that a lack of contractual clarity can lead to the phenomenon of 'bogus self-employment', where workers are treated as self-employed even though they should in fact have employee status. As a result, workers can be denied key rights and workplace benefits, including minimum wage entitlements, National Insurance contributions from employers, sick pay, holiday pay, employers' pension contributions. Previous research has identified that as many as 1 in 10 individuals could be wrongly self-employed, costing them an average of £1,200 lost in holiday pay and a loss to the government of National Insurance contributions worth around £300 per person per year.⁴⁵

In respect of migrant workers in particular, it is common for individuals to be given 'verbal contracts' that allow their employer to give them work outside of the initial scope of the agreed role or change the terms of the job entirely as part of contract substitution. It also means that workers are unaware of their rights in key areas such as holiday entitlement and holiday pay, working hours and sick pay.⁴⁶

4.4. Migrant workers coming to the UK on short-term visas are less likely to be aware of their employment rights or to seek remedies in cases of labour violations.

We strongly agree with this statement. However, it is important to add that the inability of migrant workers to access employment justice is not only an outcome of their lack of knowledge, but also an outcome of the inaccessible labour enforcement system, and the fact that the government continues to lack a strategy for migrant worker welfare, despite the evidence which documents their overrepresentation in precarious work.

KNOWLEDGE OF EMPLOYMENT RIGHTS

Recently published research demonstrates that although many migrant workers experience labour exploitation, many do not immediately realise or recognise the severity/illegality of the

actions that they suffer from. Part of the reason for this is that workers often have a misperception about what non-compliance looks like, as some practices which are actually exploitative may be considered routine or normal in their countries of origin. Similarly, many migrant workers often only realise that they have been at the receiving end of exploitation when family or friends point this out to them.⁴⁷ On employment rights specifically, migrant workers often have a limited knowledge or understanding about their rights, how to enforce them and where to seek advice and assistance where they are infringed. Differences *'in culture and the law can be a driver of this, along with language barriers'*.⁴⁸

SEEKING REMEDIES

There are a number of reasons why migrant workers coming to the UK on visas are less likely to seek remedies in cases of labour violations. Primarily, as has been identified on numerous occasions by previous research and by the office of the DLME itself, the UK currently does not institute any separation or firewalling between its immigration enforcement authorities and the labour market enforcement bodies tasked with combatting non-compliance in the labour market. As a result, migrants with a precarious form of immigration status who have experienced some form of labour exploitation are effectively barred from reporting this to the police or to the UK's enforcement bodies because of the possibility that information pertaining to their immigration status leads to a loss of work and their removal from work in the UK. As our most recent publication has outlined, this approach is in stark contrast to some of the UK's international partners and reform in this area is well overdue.

In addition, the very nature of sponsorship under the UK's immigration system and the possibility of tied visas means that workers are dissuaded from reporting cases of non-compliance. The two examples below indicate how this can arise in practice:

EXAMPLE #1 – THE OVERSEAS DOMESTIC WORKER VISA

The Overseas Domestic Worker (ODW) visa allows migrant domestic workers (such as nannies, cooks and cleaners) to visit and work in the UK with their employer for a period of 6 months. The route sees around 20,000 visas issued each year and in 2022, 18,558 visas were issued under the ODW category.⁴⁹ In 2012, the rules around the ODW visa were changed substantially, meaning that migrant domestic workers under the visa were tied to the employer that they entered the UK with.⁵⁰

Subsequent research identified that these changes resulted in significantly worse treatment for those workers who were tied to their employer in comparison with those who were employed under the previous regime. For example, they were twice as likely to be physically abused, and more likely to be paid less than £50 a week and not be allowed out of the house.⁵¹

Though in 2016 the ODW rules were changed to allow workers to switch employers, because of the short duration of the visa and the fact that visas can't be renewed by workers, it is practically difficult to find another job as a domestic worker for another employer before

their visa expires and they become undocumented or 'illegal' in the eyes of the law.⁵² Therefore workers are hindered by both the tied and short term nature of the visa.

Additionally, focus has recently switched to how workers' status as live-in domestic workers is used by employers as a means of paying individuals below the minimum wage. The 'Family Worker' Exemption is an exemption in National Minimum Wage regulations that allows live-in domestic workers to be paid below the minimum wage where they are treated as a 'member of the family'.⁵³ Though the Employment Tribunal has found that the exemption is unlawful because it is indirectly discriminatory (as domestic workers are more likely to be women and therefore affected by underpayments), the government has still not revoked the exemption.⁵⁴ This is delaying justice for many who are already vulnerable under the ODW visa route.

EXAMPLE #2 – INTERNATIONAL STUDENTS AND THE CARE SECTOR

Under the terms of a Student visa, international students on a full-time course of degree level or above are permitted to undertake employment for 20 hours per week during term time (with full-time employment permitted outside of term time). However, as was noted by the GLAA in a recent Home Affairs Committee evidence session, individuals coming to work in the UK's care sector are often female students on student visas. Some agencies are recruiting these students, forcing them to stay in substandard accommodation and not paying them properly. More importantly however, they are often forced to work excessive hours, over and above the 20hr working limit. However, because this technically constitutes a breach of their visa conditions, the agency uses this to tie the worker into a cycle of exploitative work (because if they do report what is going on, it is the worker that will be punished).⁵⁵

In our view and experience, there is already an asymmetrical power dynamic at play between sponsors and sponsored migrant workers because the latter tend to be less informed about their rights under their visa (often the ability to switch to another sponsor in particular). However, these examples indicate a more worrying reality which is that some sponsors are actively abusing a combination of (1) the framing of the UK's immigration rules and (2) the current lack of separation between labour market enforcement and immigration enforcement, to trap migrant workers into a cycle of exploitative work.

Adequate resourcing of the UK's labour market enforcement bodies or an SEB will not be in and of itself sufficient to root out the sponsors that are engaging in these practices. What is required is a fundamental culture shift and an acknowledgement of how the UK's immigration rules play into labour market non-compliance. Providing a safe environment for migrant workers (regardless of immigration status) to report non-compliance will also be necessary. Fundamentally, we believe that the only long-term solution to address these issues for workers is for the UK to institute a 'Migrant Worker Welfare Strategy', one that recognises the contribution that migrants make to the UK's economy but mitigates against the factors that bring about potential exploitation. Though we understand that the DLME has a limited ability

to directly implement these changes, we nonetheless believe that the DLME has the platform to highlight these issues and bring much needed urgency to this debate.

SECTION 3 - OTHER ISSUES

PHOENIX COMPANIES

As the DLME will be aware, the prevalence of so-called phoenix companies continues to provide a cover for the exploitation of migrant workers. Our Service Provision team recently indicated that while in previous years phoenix companies had predominantly affected self-employed workers approaching our organisation from the construction sector, the pool of affected clients is now much wider, including workers who have been employed on a more formal basis in other sectors. Moreover, there is a lack of clarity about who has regulatory teeth in this area. Whilst we note generally the role of the UK's enforcement bodies, Companies House, the Serious Fraud Office, the Financial Conduct Authority and the Insolvency Service, it is common for workers in these cases to be left without redress for their individual issues (normally non-payment of wages and statutory pay). For example, while the Insolvency Service can carry out live company investigations, it cannot use its powers to *'investigate or resolve individual commercial disputes between companies and their employees'*, including when the complaint is about not paying an employee's wages.⁵⁶ It is also unclear what proactive monitoring is done to prevent phoenix companies from surfacing i.e. whether registered addresses of newly formed companies are checked against companies that have recently dissolved and the extent to which this is flagged as potentially problematic.

This is yet another area where the complicated tapestry of the UK's enforcement landscape makes it difficult for workers to resolve their issues. We welcome the new powers that will be given to Companies House as a result of the Economic Crime and Corporate Transparency Bill to clamp down on anomalous or suspicious filings and behaviour, but we anticipate that the phenomenon of phoenix companies will require further examination as part of any wider reform of the UK's enforcement landscape and the introduction of an SEB.

IMPROVING ENGAGEMENT WITH THE THIRD SECTOR

We believe that there is ample opportunity for the enforcement bodies to improve their engagement with stakeholders in the third sector.

Looking at the GLAA, in its Annual Report and Accounts for 2021-22, the GLAA confirmed that Labour User/Labour Provider and Worker/NGO liaison group meetings continued to take place throughout the year, with increased attendance at the latter.⁵⁷ While these meetings are useful for spreading awareness and information related to the activities of the GLAA, we believe that more can be done to establish a reciprocal channel of communication. Organisations in the third sector, including ourselves, regularly track data and information concerning the

exploitation of workers and vulnerable groups. It would be useful to use this forum/establish a separate forum where these trends and the nature of exploitation that organisations are seeing can be regularly communicated to the GLAA to improve the information available to them and, crucially, improve investigations. A similar forum could be established with other enforcement bodies, which lag far behind the GLAA in third sector engagement.

The provision of case specific information would obviously depend on the introduction of safe reporting mechanisms and would require data sharing agreements. In our view however, this is an important and worthwhile investment in capacity. Closer collaboration between third sector organisations with a frontline presence, and labour enforcement agencies may also assist in tackling persistent offenders, as organisations often triage and build up an evidence base on their own anyway, before considering making a report to the GLAA or one of the other enforcement bodies.

Third sector and community-based organisations play a critical role in advising hard to reach communities, facilitating community cohesion throughout the advisory process. The UK's enforcement bodies would do well to learn from this and engage more actively with community organisations on a regular basis.

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