

Modern Slavery in the Care Sector

Facilitator's Notes

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Purpose: To raise awareness of the causes and effects of modern slavery in the care sector, how to spot the signs and what to do if you are concerned.

Who is it for: This resource is for those who work in care sector or who visit care homes in the UK, for example care home managers and staff, chaplains, church visiting teams, and relatives.

Structure of the online course

Timings	Content	Notes (PPT slides)
5 mins	Intro and purpose	Slides 1 and 2. Facilitators welcome participants and introduce themselves and the purpose of the session
5 mins	Part 1: Introduction to Modern Slavery	Slides 3-6 – talk through
30 mins	Horse trading video	Slide 7 Watch video (9 mins) BO rooms 10 mins to discuss questions Feedback 10 mins
15 mins	Exercises on the nature of modern slavery	Slides 8-13. Interactive presentation of location, victim vulnerability, how offenders exert control, signs of exploitation and the scale of the problem
5 mins	Any questions	
5 mins	Break	
10 mins	Part 2: Introduction to MS in the care sector	Slides 14 -21 – talk through slides and pause for questions
5 mins	Risk factors	Slides 22-23
15 mins	Terri's story	Slides 24-25 Watch the video, 3 mins BO discussion 6 mins Feedback 6 mins
5 mins	Input on methods of recruitment and control	Slides 26-28 Talk through
10 mins	Spotting the signs	Slides 29-30 Brainstorm and input
15 mins	Scenario	Slide 31/32 depending on whether care sector staff or visitor to care home
10 mins	How to respond	Slides 33-37 - the difference between a concern and intelligence and numbers to call
10 mins	Community Partnership Information Form	Slides 38-41 - mainly for care sector staff but of interest to all, including whistleblowing policy
5 mins	Any questions or concerns	Finish with final quote slide 42
2.5 hours	Close	

Introduction

The scale of modern slavery in the Care Sector (Unseen Helpline)

(Please note that the following data is limited to contacts into the Unseen helpline and although they suggest certain trends they cannot be understood as representative of MSHT in the UK).

- The number of potential victims of modern slavery in the UK more than doubled to record levels last year, with a particularly sharp increase in alleged exploitation in the care sector, figures show.
- There were 15 care sector-related modern slavery cases in 2021. This soared to 106 cases in 2022.
- 712 potential victims of modern slavery came forward to the Helpline in 2022, compared with 63 potential victims in 2021.
- In its annual assessment of calls to the helpline, Unseen said the most notable trend in labour exploitation occurred in the care sector, amid concerns about labour shortages and low pay in care homes.
- In the care sector, the number of potential victims increased from 106 in 2021 to 708 last year, the charity said. Exploitation of Indian, Zimbabwean and Nigerian nationals was particularly prominent in care homes, 48% of potential victims from the care sector were Indian; 15% from Zimbabwe; 8% from Nigeria
- Of the 46 Zimbabweans who were identified as potential victims of slavery in the UK last year, all but one were working in the care sector.
- Between January and June 2023 the Helpline recorded that 25 different nationalities were affected by this exploitation, with 96% of potential victims indicated as being from Asian or African countries.
- In the first six months of 2023, care workers indicated to the Helpline had an average debt of £11,800, to pay for recruitment, visa and travel costs.
- The report explained the context of exploitation concerns in the care sector. It said: “The care sector has always been an area where forced labour could be present because of the use of temporary labour and the levels of low pay.”
- it said one case involved several young men and women working in care homes on student visas through an agency. At the time of the call to the helpline, they had been working 14-hour shifts for five days without pay.
- Of the potential victims indicated in modern slavery situations involving the care sector between January 2022 and June 2023, **the majority were female (235) with 143 indicated as male.**
- **For 642 individuals the gender was recorded as unknown.** This is often done where information is received about more than one worker and the caller to the Helpline is unable to say with certainty how many were male and how many were female
- As would be expected, **the majority of potential victims indicated in the care sector are adults (363).** Only two minors were indicated, and a further 655 were indicated to the Helpline where the age status was recorded as unknown.

The Modern Slavery Act

“Modern Slavery encompasses slavery, human trafficking, servitude, forced or compulsory labour. Traffickers and exploiters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.”

The Modern Slavery Act gives law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims. It received Royal Assent on Thursday 26 March 2015.

This act:

- States that perpetrators should receive suitably severe punishments for modern slavery crimes (including life sentences)
- enhances the court's ability to put restrictions on individuals where it's necessary to protect people from the harm caused by modern slavery offences
- creates an independent anti-slavery commissioner to improve and better coordinate the response to modern slavery
- introduces a defence for victims of slavery and trafficking
- enables the secretary of state to make regulations relating to the identification of and support for victims
- make provision for independent child trafficking advocates
- introduces a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- enables law enforcement to stop boats where people are suspected of being held or trafficked
- requires businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains.

The role of the GLAA (Gangmasters and Labour Abuse Authority)

The GLAA works in partnership to protect vulnerable and exploited workers.

A Non Departmental Public Body (NDPB) governed by an independent board made up of a chair and six members, who were recruited for their respective knowledge, experience and skills.

Their role is to protect vulnerable and exploited workers. Through the intelligence received from inspections, the public, industry and other government departments, they investigate reports of worker exploitation and illegal activity such as human trafficking, forced labour and illegal labour provision, as well as offences under the National Minimum Wage and Employment Agencies Acts.

The GLAA investigates all aspects of labour exploitation in England and Wales but also works with partner organisations such as the police, the National Crime Agency and other government law enforcement agencies to target, dismantle and disrupt serious and organised crime across the UK. Our licensing scheme regulates businesses who provide workers to the fresh produce supply chain and horticulture industry, to make sure they meet the employment standards required by law.

If you are an employment agency, labour provider or gangmaster who provides workers to the sectors listed below, you will need a GLAA licence:

- Agriculture
- Horticulture
- Shellfish gathering
- Any associated processing and packaging

How does the licensing scheme work?

Labour providers are assessed to check they meet the GLAA licensing standards which cover health and safety, accommodation, pay, transport and training. We check that they are fit to hold a licence and that tax, National Insurance and VAT regulations are met.

A labour provider must have a GLAA licence to work in the regulated sectors, it is a criminal offence to supply workers without a licence or use an unlicensed labour provider.

What are the benefits of licensing?

Workers receive fair treatment, the pay, benefits and conditions they are entitled to.

Labour providers are not undercut by those who pay less than the minimum wage or avoid tax. Industry standards are raised.

Labour users can check their workers come from a legitimate provider and are informed if their labour provider's licence is revoked.

Consumers can be assured that their food has been picked and packed in an ethical environment.

Understanding the problem (Unseen report)

- Census data shows that **18.6% of the population was over the age of 65 in 2021**, an increase of 2.2% in a decade.
- With more than **11 million over-65s in the UK in 2021[3]** and **900,000 with dementia in 2022[4]**, demand for adult social care continues to grow.
- **Persistent underfunding of the sector by successive governments** has created long-term issues of low pay and poor working conditions.
- The Health Foundation reported that **“one in five residential care workers in the UK were in poverty before the cost-of-living crisis”**.^[5] Such conditions led to widespread staff shortages and these escalated as **a result of the COVID-19 pandemic when travel restrictions and the mandatory vaccination policy limited the pool from which people could be recruited**.
- **Brexit's impact on international recruitment and retention has also contributed to staff shortages**. Nuffield Trust reported that many staff from EU countries did not apply for leave to remain, and returned to their home countries following the cessation of free movement.
- Many staff stated that **racial discrimination led to decisions not to return to the UK** following periods abroad.^[6] Following Brexit, the UK has become less attractive to staff from EU countries.
- **The result was focused recruitment on cheaper labour from non-EU countries** – individuals drawn by the opportunity to improve their quality of life and earning potential. Of care

sector staff recruited in 2022, 90% came from non-EU countries, illustrating the reliance on short-term cheap labour rather than long-term planning for provision.[7]

- By March 2023, the Govt had issued some **102,000 skilled worker-health and care visas** to foreign workers.



The nature of care work

- Most work in the care sector is temporary.
- Often, workforce turnover is high and the need is acute.
- Workers are required to look after people who need round-the-clock care, whether at home or in a residential care setting.
- Care workers support people who need help with daily tasks such as showering, shaving and dressing, as well as supporting their general wellbeing.
- A care worker often works irregular hours including shift work, which can include working nights and weekends.
- Although supporting people who need daily help is an important role, no specific skills or qualifications are required to become a care worker. Nevertheless, some migrant care workers are qualified nurses in their home countries.

Risks of abuse for workers in the care sector

It is now very clear that there are significant risks for workers travelling to the UK on such visas, which can leave them vulnerable to unscrupulous employers and recruitment agencies.

Vulnerability factors poor economic status, poor education and lack of knowledge of workers' rights, immigration status, dependents at home, language difficulties, lack of family support, and mental health issues.

These factors can lead to a worker receiving low pay that is less than anticipated or promised combined with higher-than-expected living costs.

They may be forced to pay exorbitant "fees" to the recruiter for a range of services, from training to accommodation and transport

They may have difficulties finding somewhere to live, which can leave workers at the mercy of an agent or employer.

Risks to care home residents

Exploited unqualified workers recruited as carers can present a safeguarding risk due to the fact they will not have received adequate training. They may also have limited language skills, they may be overworked and have low morale due to the position they find themselves in. As a result, residents may suffer distress and discomfort from the lack of physical and emotional care.

Risks of overseas recruitment to businesses

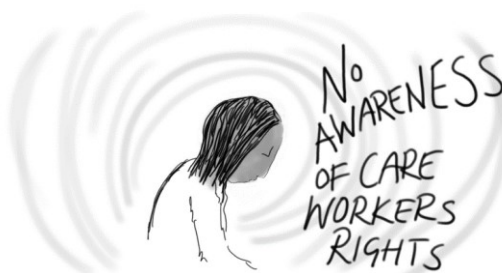
Recruitment from overseas can also be a complex and lengthy process for employers in the care sector. Issues include:

- High staff turnover and shortages, leading to increased use of agency workers
- Identifying legitimate employment agencies
- High fees from agencies, that could be bona fide or inflated by middle men and women
- Difficulty navigating the administrative process
- Organising travel arrangements for workers once in the UK, including getting to site and clients' homes
- Providing pastoral support for new recruits
- An already overstretched workforce, meaning it's easier to miss the warning signs of exploitation.



Common Methods of Exploitation in the Care Sector:

- Carers are recruited from outside the UK and sponsored to work here – they are usually from India or African nations.
- On arrival the accommodation they are given is provided by the exploiter and the cost of it taken at source from their earnings.
- They are made to work excessive hours daily and without days off. If they complain they are threatened with having their sponsorship withdrawn and being deported.
- They are charged for “legal fees”, often up to £15,000, which are deducted at source. It is unclear what the nature of these fees are. They have no knowledge of care worker’s rights
- They are not provided with access to transport to travel between their clients. If they are provided with transport, they are charged for this and it is deducted from their salary at source.
- Some victims have advised that there are large distances between clients and they have been told by their exploiters to “run” between them if no public transport is available.
- Due to all of the deductions, victims are being paid only a small fraction of what was agreed when they were recruited.
- Some victims report being verbally and physically abused by their exploiters, or their shifts taken away/ cut if they complain about working conditions, causing them even greater financial difficulty.



Debt Bondage

The UK operates under the ‘employer pays principle’ (EPP) in relation to the Health and Care visa, which requires that no worker should pay for a job; rather, recruitment costs should be borne by the employer.

With many people in the care sector paying thousands of pounds to third-party facilitators in their home country, workers can arrive in the UK with substantial debt. In other situations, workers are paying huge fees directly to their employers at the care companies for certificates of sponsorship.

On applying for a Health and Social Care visa, an individual is required to pay an application fee of £247 to the Home Office, and the employer is required to pay an immigration skills charge of £364 and £199 for the certificate of sponsorship.

Yet we are continuously hearing about workers being charged considerably higher fees by their employers. The only way workers can pay off the debt is to work long hours with few breaks.

Being in debt alone doesn’t meet the threshold of modern slavery. However, when workers feel unable to leave because they are being threatened by their exploiter or they’re being forced to work long hours and have no other means of income, they can become trapped.

Having such a debt, which is often raised through family and community members or by mortgaging or selling property, can have a significant psychological impact on a vulnerable person. In some cases the debt accrued to secure sponsorship, work, and travel to the UK is around £2,000. However, in many instances the debt can exceed £20,000, and in a few cases as much as £25,000. This is significant for anyone, let alone someone paid at or less than the National Minimum Wage.

Add to that the likelihood of deductions being made from an individual's pay for accommodation, food and transport, and it becomes evident that workers are in a cycle where they will never be able to pay off the debt.

£11,800 is the average amount of debt reported by people who contacted the Helpline, to pay for recruitment, visa, and travel costs. * * Based on Helpline reports received between January and June 2023



Case study (GLAA)

Just over two years ago, a husband and wife were arrested under suspicion of exploiting vulnerable students and supplying them to six care homes in North Wales. The Gangmasters and Labour Abuse Authority (GLAA) investigation brought the issue of modern slavery in the care sector to the fore and 74 further victims have since been identified. This was the first investigation into the care sector but it is now a significant priority area for the GLAA.

The Clewer Initiative spoke to Martin Plimmer, National Investigation Lead (North) for GLAA to find out more.

“In December 2021, two addresses in the Colwyn Bay area were searched by the GLAA, and nine Indian students were identified as potential victims of modern slavery and labour abuse. GLAA officers found the workers sleeping on mattresses on the floor in cramped, cold and unsanitary conditions. A further five potential victims, also Indian nationals on student visas, were also identified within the community and signposted to support. The suspects, both registered nurses, ran a recruitment agency.

“Professionals working within care homes in North Wales raised the alarm about the quality of care that the staff supplied by the agency were providing to residents. They shared that the workers turning up tired and “smelling” and were always hungry. They were even spotted eating leftovers from meals given to the care home residents.

“Investigations indicated they all worked more than the 20 hours per week allowed for students studying in the UK, and that their wages were controlled by their alleged exploiters.

“Reports also suggested that the potential victims were transported to and from work each day, with the suspects dropping them off and collecting them close to the care homes, but never from directly outside them.”

GLAA Senior Investigating Officer Martin Plimmer concludes: “There is a well-publicised shortage of workers within the care industry which has been amplified by the COVID-19 pandemic. This presents real risks as opportunists and unscrupulous employers may look to fill this void by exploiting vulnerable workers.

“We believe that the suspects have recruited the potential victims from areas and regions of India that they themselves are familiar with. They appear to have gathered people who aren’t qualified, aren’t suitable for the work they are being asked to carry out, and who have been made to work excessive hours, especially so if they are here on student visas.”

Recruitment methods (Unseen Helpline)

As in many other industries, **job offers or advertisements** were a common method of recruitment into situations of modern slavery for potential victims in the care sector (237 potential victims, comprising 23.2%).

- Some care companies recruited individuals directly and others used **third-party recruitment agencies**. This recruitment often took place online (24, 2.4%) or at a recruitment agency’s office or website (28, 2.7%).
- **False promises or statements were common** (133, 13%) appealing to individuals planning to emigrate for a better life. In one case the initial job offer promised a car, driving lessons and accommodation, which did not transpire.
- **Offers of accommodation were frequent** (55, 5.4%), a necessity for people migrating from overseas. Less frequently indicated was an exploiter posing as a benefactor (16, 1.6%) or recruitment through family members (4, 0.4%) or friends (4, 0.4%).
- In several situations, **individuals were recruited by exploiters who had ties to their home country**, such as being from the same village or area.
- Sometimes a worker will gain entry to the UK on a healthcare visa but will be given a different role, such as a caterer, cleaner or hairdresser according to the need.

Methods of control

Financial control was indicated for almost three-quarters of potential victims (739, 72.5%). Financial control presented itself in several ways, including withholding of wages, non-compliance with National Minimum Wage, withholding of payslips, large deductions from salary, debt bondage, and excessive fees for breaking contract. T

Tied accommodation was prevalent (613, 60.1%), presenting as accommodation provided by the employer or potential victims living at the work premises. Living conditions were often described as poor and overcrowded.

Confinement or restricted movement was indicated by nearly half of potential victims (439, 43%). Potential victims had their travel to the UK arranged by the employer, were transported to and from work, forced to find accommodation within a certain radius of the work premises, or prevented from going to places of worship or attending medical appointments.

Threats were also common (348, 34.1%). Threats to revoke certificates of sponsorship or have potential victims deported were commonplace, as were threats to report potential victims to the police or the Disclosure and Barring Service, and threats that references would not be provided or that working hours would be cut. Threats were made to harm not only the individual but sometimes a family member or someone else close to a potential victim (41, 4%).

Actual physical harm was also reported (21, 2.1%). Emotional abuse was indicated with almost a quarter of potential victims (238, 23.3%). Potential victims were often shouted at, insulted or subject to racial abuse.

Monitoring was reported with many potential victims (88, 8.6%), which could consist of someone watching them continuously in person, via CCTV or GPS, or checking up on them through numerous phone calls or text messages. Important documents being withheld or destroyed (73, 7.2%) included passports, visa documentation and contracts. Isolation (72, 7.1%) was recorded when potential victims had been prevented from communicating with colleagues, patients, friends, or family members

Spotting the signs

Signs to be aware of:

- Carer is likely to be from India or an African nation and newly working in the UK
- Appears tired or in poor health
- Walking long distances - no apparent means of transport to move between clients/no obvious local transport links to facilitate this
- Not being paid for travel between appointments
- Not keen to engage in conversation
- Appears fearful or unhappy
- Working continually without lunch breaks or days off
- Being paid under the minimum wage or not at all
- Poor accommodation
- Looking destitute
- Care company provides transport and a driver
- Restricted movement including not being allowed to attend church or other place of worship
- Workers not being trained fully as care workers creating a risk to the residents



Case study: Terri's story

<https://www.bbc.co.uk/news/uk-66260064>

Terri was recruited as a home carer after replying to an advert in her own country. Recruited by an agency in her home country in Africa, Terri was offered work in the UK as a domiciliary carer. The agency told her it would arrange her work visa and transport.

She was interviewed in person, took an English test, and had to provide proof of her work experience. She was promised a job as a care assistant in the UK through a care company. She was told she would earn up to £29,000.

For Terri, who was in an abusive marriage, the job was the perfect opportunity to escape with her three children. "Butterflies were going through me, it was one of the best days of my life," she says.

Terri brought her mother with her to the UK, so she could look after Terri's children. Although Terri would be provided with somewhere to stay through the care company, depending on where she was asked to work, the children and their grandmother went into private rented accommodation.

Terri told us she found her work hours gruelling - up to 20 hours a day - and that she often worked seven days a week. The car she had been promised to travel between clients did not materialise, so she had to walk to appointments.

When Terri eventually received her wages from the company two months later, it worked out at less than £2 an hour, which is illegal.

Terri complained to the care company but it threatened to stop her work and cancel her visa. She says other carers she got to know also warned her that the firm's owner had political links in her home country.

"That makes him very dangerous where we come from - you don't want to go against someone like that," she told us.

Her low pay meant she was unable to continue paying rent for her mum and children - and they were forced to leave their accommodation.

Terri was on a night shift while her mother and children spent the night on the streets. They were spotted by a member of the public and Terri was reported to social services.

When they asked to see her rota they were shocked. "This is too much, this is insane," she says they told her. Social services helped Terri get placed in the National Referral Mechanism, the government system set up to identify and support victims of modern slavery.

She and her family are now in accommodation provided by social services. Terri is now seeking asylum in the UK - and until a decision is made she isn't allowed to work. The Home Office has told her she has "reasonable grounds" to prove she was a victim of modern slavery.

How to respond

When something doesn't feel right:

Care sector staff can be inquisitive but not investigators. Be mindful of putting a potential victim in jeopardy or scaring them off with questioning. However, keep your eyes and ears open for the following observations which apply to care workers, caterers, cleaners and hairdressers:

- What is their typical working day like – duration, number of clients? Do they get days off?
- How do they travel between clients?
- What sort of accommodation do they live in and who with?
- Are they sending money back home to support others?
- Do they have access to their passport or other ID documents?
- Is the job what they expected it to be and if not in what way does it differ to what was agreed?

If the responses to any of these enquiries cause you concern, you can contact a number of organisations to help you. If appropriate you can obtain leaflets on workers right form GLAA. These leaflets are available and downloadable in 21 different languages.

What to do if you are concerned:

Persons	Emergency	Follow on from emergency call	Not an emergency but there is a safeguarding concern
Care staff/ management	Call 999	Designated safeguarding officer of the care home	<ol style="list-style-type: none"> 1. Designated safeguarding officer of the care home 2. Call 101 3. Modern Slavery helpline (08000 121700) 4. GLAA (0800 432 0804)
Chaplain	Call 999	<ol style="list-style-type: none"> 1. Designated safeguarding officer of the care home 2. Diocese safeguarding officer 	<ol style="list-style-type: none"> 1. Designated safeguarding officer of the care home 2. Diocese safeguarding officer
Relative	Call 999	Designated safeguarding officer of the care home	<ol style="list-style-type: none"> 1. Designated safeguarding officer of the care home 2. Call 101 3. Modern Slavery helpline (08000 121700)
Volunteer Visitor	Call 999	<ol style="list-style-type: none"> 1. Designated safeguarding officer of the care home 2. Designated safeguarding officer of the voluntary organisation 	<ol style="list-style-type: none"> 1. Designated safeguarding officer of the care home 2. Designated safeguarding officer of the voluntary organisation 3. Call 101 4. Modern Slavery helpline (08000 121700)

What needs to be put in place?

Bevan Brittan article: Modern Slavery in the UK adult care sector

With an increased focus on international recruitment, necessary reliance on agency staff and other outsourcing options to meet ongoing recruitment challenges, **providers will need to ensure that they have suitable and sufficient management and monitoring systems in place when working with intermediaries in the supply chain.**

In addition to the need for increased diligence required in managing the supply chain, other risk areas include: **Evaluating the risks of labour abuse and modern slavery in the supply chains and ensuring appropriate and robust due diligence processes both at the point of recruitment and throughout the course of the employment relationship**, will be increasingly important in attracting and retaining staff, and ensuring that providers meet their Modern Slavery Act 2015 obligations.

Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 requires commercial organisations with an annual turnover of £36 million or more to **publish an annual statement setting out the steps they take to prevent modern slavery in their business and their supply chains.**

The annual statement should include:

Remuneration risks where wages are withheld or excessively reduced in exchange for food and accommodation.

Recruitment risks where pre-recruitment checks can fall short of the relevant guidelines.

Debt bondage, where migrant workers are working to pay off money borrowed to travel to the UK whose passports or permits are withheld until fees are paid.

Solutions for Care sector exploitation for businesses (Unseen)

Early in 2023, the Government announced funding to support employers with international recruitment in adult social care over 2023-2024 and encourage ethical employment practices.

1. The Employment Agencies Standards Inspectorate also has a key role to play It can ensure recruitment agencies operate legally and have the right checks in place to ensure workers are not exploited.
2. If you are an employer or a worker who has any concerns about recruitment or working conditions, contact the Unseen Helpline, where a trained advisor can tell you what to do next.
3. The Helpline is free and open 24 hours a day on 08000 121 700.

Whistle Blowing

- All care home organisations should have in place a whistleblowing policy which allows any members of staff to raise concerns in an appropriate and protected way.
- There should be a clear pathway for escalating concerns to the appropriate authorities
- There should be on-going support to individuals to ensure they do not suffer detrimentally as a result of whistleblowing

Support for employers: tackling exploitation and responsible recruitment

- Unseen works with businesses from the care sector, helping them reduce the risks of exploitation, and address any issues, in their own operations and supply chains.
- They help with anything from site visits to check on worker welfare, to support with policies and processes.
- Additionally, they have developed a comprehensive responsible recruitment toolkit in collaboration with the Recruitment & Employment Confederation.

This free resource is tailored specifically for small and medium-sized (SME) recruitment agencies. It provides practical guidance, hints, and tips to help you tackle worker exploitation while promoting worker rights and ethical recruitment.

Want to know more? Get in touch at business@unseenuk.org or call 0303 123 0021 to learn more and request your free copy of the SME recruitment toolkit.

Conclusions (Unseen)

As the UK continues to struggle with labour shortages the potential for vulnerable workers to be targeted persists. Migrant workers are needed in sectors such as agriculture and care, but the support available for people who are thinking about travelling to the UK to take up employment is poor.

Not enough information is given to workers about what is and isn't acceptable practice, such as paying to secure a job. Many workers travelling to the UK don't know their rights and by the time they get to their work destination, it's often too late and they find themselves trapped by debt, fear of abusive employers, or lack of information.

With the current economic and political climate, we're likely to see an increase in the number of vulnerable people contacting the Helpline. Our remit is not only to provide immediate assistance to vulnerable people but also to assess and monitor emerging trends. That way we can ensure that as issues materialise, we can work with our partners and stakeholders to seek ways of preventing exploitation from occurring in the first place. [1] <https://www.gov.uk/government/publications/code-of-practice-for-the-international-recruitment-of-health-and-social-care-personnel/> code-of-practice-for-the-international-recruitment-of-health-and-social-care-personnel-in-england

Recommendations (Unseen)

- Ensure **sufficient information about workers' rights and transfer of sponsorship** is provided to people intending to travel to the UK to work in the care sector using a Health and Care visa.
- Introduce **additional checks at visa issuing centres in countries of origin** to ensure visa applicants have not paid recruitment fees to a third party.
- Implement **stricter guidelines around repayment clauses and exit fees**.
- Guidance around exit fees needing to be "proportionate"[1] are too vague, and are easy for unscrupulous employers to abuse.
- **Establish a clear channel for reporting to the Home Office and Department of Health employers who charge workers for certificates of sponsorship.**

- **Increase salaries** of care sector staff as recommended by the Migration Advisory Committee.
- Require **mandatory modern slavery training to be completed by all Care Quality Commission inspectors and local authority staff.**
- Provide **Government support to migrant workers whose sponsor's licence has been revoked**