



Call for Evidence: Home Affairs Committee inquiry on work-based immigration

Response by Migrants' Rights Network and Migrants at Work

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1. Migrants' Rights Network and Migrants at Work

Migrants' Rights Network is a UK charity that stands in solidarity with migrants in their fights for rights and justice. We co-curate campaigns using anti-oppression practices to create transformational change, extending beyond the individual impact on migrants' lives, to tackle oppression at its source.

Migrants at Work is a lived-experience-led organisation that works alongside migrant workers to know, claim and defend their rights in the UK. Since 2009 Migrants at Work have been researching how legal rules enable employers, recruiters and others to traffic workers through legal migration routes into exploitation.



Both organisations support the **Justice for Sponsored Workers (JFSW) group**, a migrant-led movement formed in August 2024 to represent workers on sponsorship visas and their families. Its members work in care, construction, hospitality, engineering, agriculture and higher education across the UK. This joint evidence draws on the expertise and lived experience of Migrants at Work, along with case studies from those who have experienced exploitation and modern slavery.

Since July 2025, Migrants' Rights Network has also been supporting several migrant-led campaign groups that formed in response to the 2025 Immigration White Paper, and especially the earned settlement proposals. These include the Not A Stranger Campaign, Long Residence Advocacy Group and Justice for Carers, amongst others. All have produced their own briefings on the impact that the earned settlement framework would have on them if the proposals came into effect.

2. Introduction and summary

The sponsorship system, as currently designed, creates vulnerability to exploitation and trafficking. Workers whose right to remain depends on a single employer have little power to refuse unlawful charges, challenge poor conditions or report abuse. When enforcement does take place, it can penalise the worker rather than the sponsor. Policy that relies on international recruitment to fill shortages, particularly in lower-paid roles, therefore needs to be judged on how workers are treated, not only on how many are recruited.

The Justice for Sponsored Workers Campaign was launched well before the 2025 Immigration White Paper, and the associated "earned settlement" proposals. The violence, exploitation and precarity sponsored workers and their families face is well documented, as acknowledged in the [2025 Committee of Public Accounts Inquiry on Immigration: Skilled worker visas report](#). A corollary to this is the ease with which workers can become irregularised, through no fault of their own - whether through their sponsor having their licence revoked, administrative mismanagement of sponsoring processes, redundancies, sudden increases to salary thresholds which employers are not willing to match, or prohibitive visa renewal costs.

A common refrain we have heard from workers experiencing exploitation, is that they just have to 'get through', or 'put up with' conditions for five years, and then they can change employers, or at least will be better able to advocate for their rights without their employer threatening to cancel their sponsorship. Five years is already too long. The earned settlement proposals, if implemented, will vastly increase both the number of individuals and families held in precarity, as well as the length of time in which they will be vulnerable to exploitation or having their immigration status irregularised. According to the No Recourse to Public Funds Partnership [September 2026 Briefing](#) for MPs on Earned Settlement Proposals, the proposals could affect over 2 million people living and working in the UK. Many could wait 15 years for settlement, while some could face substantially longer routes or no realistic route at all.



The key principles identified ahead of this call for evidence are that [“training and recruiting UK workers should be prioritised before recruiting migrant workers”](#) and that [“migrants who come to the UK for work should be treated with dignity, respect and helped to integrate”](#). The latter will not be possible unless the government puts an end to the fallacy of treating sponsored workers as though they are stocks that can be imported and discarded according to market demand and migration policy targets. Labour cannot be treated like any other commodity: it is inextricable from those who perform it, their families, homes, health and futures. Workers cannot simply be turned off when salary thresholds increase, licences are revoked or sponsors issue redundancies, but the present system, with earned settlement as proposed, is built on this falsehood. Migration is treated as a simple numbers game, divorced from the needs of workers: decent pay, working conditions, safe housing and the ability to plan for a future without their right to remain creating conditions of perpetual precarity.

The UK cannot claim to be committed to the eradication of modern slavery, promising workers dignity and respect while ensuring that their safety and legal presence remains conditional on the goodwill of an employer. We urge the Committee to recommend a route to settlement for these workers that sees no extension of the five-year period, giving workers a meaningful pathway to change employer, protection for those who lose their status through no fault of their own, and a clear route back to lawful status for those who have already become irregularised.

Key points

- International recruitment into poorly paid, poorly regulated roles has not resolved shortages, and has exposed workers to illegal fees, debt and control.
- There is a workforce already in the UK, including sponsored workers left without work or stranded after licence revocation, that the system does not help into safe employment.
- Employer-tied status, the 60-day limit and the absence of safe reporting routes mean workers cannot leave exploitative situations or report them.
- We recommend sponsor-independent status for all workers*, and safe reporting with a firewall from immigration enforcement.

* The recently inserted Paragraph SW 18.3 in [Appendix Skilled Worker to the Immigration Rules](#) which came into effect on 8 October 2026, enables skilled workers recognised as victims of modern slavery to work for any employer for the rest of their leave. Although this is a welcome and necessary step, there remain significant barriers to being referred into the National Referral Mechanism, and to receiving a positive Conclusive Grounds decision. These barriers continue to negatively impact Justice for Sponsored Workers campaign members, see section 4a for further information.



3. Addressing shortages

This section will address questions on 'Addressing shortages'

a. 'Low-skilled': the case of care work

Skill classification in the immigration system is driven largely by qualification level. It does not capture the demands of the work itself. Care work involves significant emotional and physical toll, anti-social and unpredictable hours, and the support of people with complex and often very challenging needs. Describing it as 'low-skilled' undervalues that work, and the classification is reflected in the pay, which in turn makes the roles harder to fill domestically and easier to fill through workers with little bargaining power.

One care worker described the toll in this way: *"Part of the essence of care work means I am exhausted. And you are exhausted from the mental gymnastics of fighting for yourself and against your employer [who is exploitative]. The whole system is undignified and yet you are meant to be caring for others."*

This matters for the Committee's question about when international recruitment should be allowed in lower-paid roles. If the answer is determined by a skill label that understates the demands of the job, the system will keep channeling workers into roles whose pay and conditions are the underlying cause of the shortage.

b. International recruitment into poor conditions

Our evidence is not a sector-wide labour market analysis, but it points to a clear risk: where international workers are recruited into low-paid roles without effective safeguards, recruitment can generate illegal fees, debt and exploitation, and workers leave or are lost to the system. Many members of JFSW describe being left with no work after arrival, being paid far below contracted pay, and being housed or controlled by the people who recruited them.

"I came to the UK to work, I have paid so much money for my visa, immigration skills charge, NHS surcharge. I did everything by the book, I have even paid fees I was not supposed to pay, because I was not aware. Now I am stuck, I have been in the UK for 4 months. My sponsor says he has no work. I am in a foreign country, with no family, no friends, no money and no recourse to public funds. What am I supposed to do?" – Care Worker

c. The workforce already in the UK

A central point for the Committee's link between immigration and domestic recruitment is that there are workers already in the UK, with relevant skills and experience, who are available for work and are not being matched to it. These include sponsored workers who arrived to find there



was no job, and workers whose sponsor's licence has been revoked. Our members report that finding a new sponsor within the 60 days allowed is, in practice, extremely difficult, and that employers are often reluctant to take on the risk of sponsorship. As highlighted in Work Rights Centre's report, less than 4% of the workers identified by the Home Office as needing support were reported to have found a new sponsor through the hubs by 30 April 2025. Stakeholders reflected on a mismatch between employers' requirements for a cheap and flexible workforce, and visa criteria that were seen to have made sponsorship increasingly costly and compliance heavy.

In a shortage sector, this is a failure of workforce planning as well as of worker protection. We recommend that the Government revise its mechanism to help displaced sponsored workers into safe, regulated employment in shortage sectors, including reforming the work migration system to give workers and care providers more flexibility in employment, without the cost and compliance pressures of employer sponsored visas.

4. Rights and conditions for workers on shortage visas

This section will address questions on 'Addressing shortages'

a. The employer tie

The fundamental problem is that, under sponsorship, an employer holds power over a worker's immigration status. The majority of members from the Justice For Sponsored Workers group held visas tied to a specific employer, and the threat, implicit or explicit, that complaining or leaving would mean visa revocation was a key element of control in nearly all cases.

Any visa created for shortage occupations will reproduce these risks unless it is designed to reduce employer control. We recommend that workers on shortage visas are not tied to a single employer and have the right to change employers, that they have a substantially longer period to find a new sponsor than the current 60 days, and a route out of sponsor dependence if they report exploitation.

"Yes, if I was assured of support, but not if it risked losing my visa. I would not approach or fight a current sponsor without the security of keeping my CoS." – JFSW member, when asked whether they would report to the Fair Work Agency

We welcome the significant step the Home Office has now taken. From 9 October 2026, [Skilled Worker visa holders who are formally recognised as victims of modern slavery](#) are no longer tied to a specific sponsor and can take up any lawful work for the remainder of their visa. It is the

¹<https://www.workrightscentre.org/media/mqkfpyi0/final-no-match-why-funding-rematching-hubs-for-displaced-migrant-care-workers-is-not-enough-to-tackle-exploitation.pdf>



principle our organisations and others have long argued for, and it recognises that workers cannot be expected to choose between abuse and destitution.

The change has important limitations: it applies only once a person has been formally recognised as a victim, so it does not help workers who are exploited but whose cases do not meet, or have not yet been assessed against, the threshold for recognition. We have multiple cases where workers facing fee-related exploitation through the sponsorship system were denied protection because their cases did not meet that threshold. It also covers only the remainder of the existing visa. Workers who are exploited but not recognised remain tied to their employer, and the fear of losing status that stops them reporting abuse remains.

A sponsored care worker reported that she was made to work hours that differed from her contract, was paid less than her payslips showed, and was refused annual leave. She reported being threatened with the end of her sponsorship and removal if she raised concerns, and with homelessness if she did not pay rent on a damp house arranged by the sponsor, where the tenancy agreement had been signed by someone else.

After reporting this via a first responder to the NRM, the decision maker accepted that she had experienced deception and a form of coercion yet the decision was still negative at the Reasonable Grounds stage. The reasoning was that she worked “willingly out of a perceived economic necessity” and that the circumstances were consistent with an employment dispute. The decision was later overturned after a solicitor supported the individual with an appeal.

Many sponsored workers in similar circumstances are unable to meet even the first-stage threshold. While we welcome the new protection for workers recognised through the NRM, it is extremely difficult for sponsored workers to secure that recognition, despite well-documented exploitation.

b. International comparisons

Other countries have introduced protections that allow workers in tied employment to speak up without losing their status. In Canada, the open work permit for vulnerable workers lets workers experiencing, or at risk of, abuse leave their employer and work for almost any other employer for up to 12 months, and family members may also be eligible. The threshold is abuse or risk of abuse, not a formal finding of trafficking, and recent guidance requires decision-makers to explain their reasoning and to be flexible about evidence. In Australia, two pilots launched in 2024 targeted the same fear of reporting. One protects workers from visa cancellation where a visa condition was breached because of workplace exploitation, and the other offers a temporary visa of six to twelve months with full work rights to pursue redress. Both rely on certification from an approved third party rather than only a state determination, and unions have been involved in shaping and where accredited, delivering this role.

In both countries, a worker who reports abuse is not left to choose between speaking up and keeping their right to work. The UK has now introduced a comparable measure for formally



recognised victims (section 4a), and the Committee may wish to compare who qualifies under each model.

c. Dependents and strictly temporary visas

The Committee asks whether workers in shortage roles should be able to bring dependents, and when strictly temporary visas are appropriate. Our evidence suggests that restrictions on dependents add to vulnerability, and that this affects workers who travel alone as much as those hoping to bring family. Many leave a partner, children or older relatives at home who depend on the money sent back. A worker in that position cannot afford to lose their job, so they accept unlawful deductions, unpaid work, unsafe rotas and poor treatment that they would otherwise refuse. The employer's control over their visa is reinforced by their family's reliance on their wages and by the debts taken on to make the journey.

The consequences can be severe. We have encountered cases where a worker left dependents at home, who were then abused there, and the worker could not return because of the debts they had taken on to reach the UK. Leaving the employer would mean losing both the income needed to repay those debts and the means of supporting their family. A JFSW member described the strain in our earlier evidence:

"For four months I spent all my money towards visa applications. One month I only survived on £50. I had three rejections every time paying the visa application fees while knowing my son was being abused back home." – JFSW member

Restrictions on dependents therefore cannot be considered separately from fees, debt and the employer tie. Together they leave workers with no safe option: staying means enduring exploitation, and leaving means losing the means to protect their family.

Strictly temporary visas maximise employer power and prevent workers from building stability. JFSW members report that prolonged temporary, employer-dependent status creates a structurally insecure population, with consequences for mental health, debt and family stability. If temporary shortage routes are used, we recommend that workers keep the right to change employer, that dependents are permitted without conditions that increase employer leverage, and that there is a clear route to settlement for those who stay.

5. Fair treatment, dignity and respect, and support for workers who lose their jobs

This section will address questions on 'Implementation'

a. Debt bondage, recruitment fees and certificate of sponsorship



Charging workers for a Certificate of Sponsorship or for securing a job is illegal, yet our evidence shows it is widespread. Many of the Justice For Sponsored Workers members reported paying such fees, ranging from £1,000 to £20,000. They were described to workers in ways that obscured their nature: as 'recruitment fees', 'job guarantees', 'visa processing', 'training costs' or 'health surcharge and admin fees'. Total costs per individual ranged from around £2,700 to over £30,000, and many are still in debt at the time of gathering this evidence.

Earlier work found workers paying an average of £17,000 for a certificate of sponsorship, and JFSW has reported amounts as high as £65,000. Workers took on debt by selling property or borrowing from family, using high-interest moneylenders and, in one case, borrowing from the exploiter. JFSW members also report taking on an average of around £4,000 in debt simply to access and maintain legal status. Payments were often made by bank transfer to accounts overseas, or by cash, making them hard to trace. In one case a worker was told to say, if asked at the airport, that they had paid the government.

Many sponsors outsource immigration matters to third-party providers, including HR services, recruitment agencies and immigration lawyers, so-called 'brokers'. Licensed sponsors who tolerate or facilitate fee-charging intermediaries should face consequences.

b. Control after arrival

Exploitation does not end on arrival. JFSW members reported deductions from pay described as repayment of a 'loan', very low pay for full-time live-in work, rent and bills charged by the recruiter or employer, a car required as a condition of employment, and unlawful deductions on leaving a job. One member had £1,100 deducted from a £1,800 monthly salary. Others were housed by the people who recruited them, with limited options to seek outside help. Members also described reprisals for ordinary employment rights such as sickness: one carer who attended an emergency GP appointment and was advised to ask for reasonable adjustments was suspended without pay for three months and told the Home Office would be notified.

A care worker recruited from overseas on a one-year Certificate of Sponsorship was housed in the director's own house at £500 a month, with frequent loss of electricity and running water. The employer also sold used cars to migrant workers for around £2,000, deducted from wages, with 5% interest added if unpaid within two to three months. She said British colleagues were paid double for holidays while migrant workers received the single rate, justified by management because they were "on CoS", and that harder routes and clients went to Black migrant workers. She reported working six days continuously and at times more than 45 days without adequate rest. After she raised concerns she was suspended on full pay for two weeks over an alleged safeguarding incident, and when she said she would contact her union, the employer later denied the suspension had happened, saying there was no paper trail.

c. Licence revocation and the 60-day limit



When an employer's sponsorship licence is revoked, the workers' permission is curtailed at the same time. The Home Office currently allows 60 days to find a new sponsor. This is not enough: finding a new sponsor is neither straightforward nor easy, and workers have no access to public funds during this period. They risk destitution, deportation and further harm and some are pushed into work in breach of their immigration conditions to survive. In one case a worker was made homeless by her recruiter after the licence was revoked, an act of retaliation.

The scale is growing. The [Home Office reports](#) that over 4,400 sponsors lost their licence in the year ending June 2026, a 140% rise on the year before and the highest on record. Each revocation can place that sponsor's workers on the 60-day clock, yet the October 2026 change gives sponsor independence only to workers who have been formally recognised as victims.

The effect is that enforcement against a sponsor punishes the workers it is meant to protect. We recommend that specific whistleblowing protections are given to workers who raise attention to abusive and unlawful practices within their workplace, ensuring that they are not put at risk of losing their jobs and visas where a sponsor's licence is revoked. Where a licence is suspended or revoked, there should be an action plan developed with independent organisations, including lived-experience-led organisations, that will advocate for and support affected workers, and a substantially longer period to find a new sponsor.

d. Compliance and safe reporting

The Committee asks how migrant workers can be treated fairly, with dignity and respect. A precondition is that they can report abuse safely. At present they cannot. Sponsored workers have little incentive to report a sponsor to a statutory agency, take legal action or join a trade dispute, because any of these can lead to the end of employment or the revocation of the sponsor's licence, and with it their permission to work. JFSW members report that people are afraid to report abuse because they will lose their visa, and that nothing protects their immigration status if they blow the whistle.

When we asked JFSW members who had reported abuse what response they received, the answers pointed to a system that does not respond. The Gangmasters and Labour Abuse Authority (GLAA) did not respond to one member and, for another, said it would investigate but nothing followed. A worker who reported to a local council and the Care Quality Commission was told both would investigate, but the council visited and said it could not find the problems, and there was no outcome. One member was told by the police that they could not take the case because it was not a criminal matter, and a modern slavery referral was refused. ACAS could not help one member because the time limit had passed, and Citizens Advice told a couple it could not help them find another job and advised them to comply with their employer. One member who reported crimes to the police asked them to wait for her National Referral Mechanism decision, which took about two years. When she went back, she was told the police could not guarantee the outcome, and the case was only taken further once she instructed a lawyer.

Our own attempt to report on a worker's behalf met the same barriers. In May 2026 we raised a case with the Fair Work Agency involving a sponsored worker who was owed around £52,000 in



unpaid wages, including deductions imposed for taking annual leave. After he raised a grievance he was dismissed, which we believe was used to deter other workers from approaching the authorities. The agency contacted the worker but told us the issues were primarily outside its remit, with the police, UKVI and HMRC having primacy. We received no further follow-up.

Across these accounts, each body treated the case as someone else's responsibility, or did not act. A sponsored worker who speaks up risks their job and their status, and may then be told that the case sits with another agency. Reporting routes that are not separated from immigration enforcement, and that do not require onward referral or a response, leave workers exposed.

The Government's anti-trafficking approach is built on compliance and enforcement. For workers who enter through state-enabled routes this is not enough. The focus needs to move from compliance and rescue to prevention, and reporting routes need to be separated from immigration enforcement.

6. Implementation: changing rules and consistency

This section will address questions on 'Implementation'

Our evidence from JFSW members is that changes to rules affecting people already in the UK have a significant impact on workers and their families. Workers have often taken on debt, sold property or uprooted their families on the basis of the rules at the time they applied. Changes that lengthen or restrict pathways increase the cost of staying, prolong periods of employer dependence and make workers less willing to report abuse or leave a bad job. Members describe lives on hold, being unable to plan housing, education, careers or even families, and '*sleeping in fear of what the next day's policies will bring*'. The constant changes also affects how workers feel they are treated:

"The other thing that really frustrates me is how we are treated without dignity. We constantly have to watch the news and see what we should do" - Sponsored worker

A Not A Stranger [survey respondent](#) similarly shared:

"I would like paths to remain reliable – it's really hard to plan for things and spend months (or years) preparing under the circumstances and for it to suddenly change (going from 5-10 years for ILR], massive income hikes). It would be so much less of a nightmare if I knew the circumstances I came here under were continued. I spent months planning and then changes meant all of it was worthless."

Beyond the extensive material and financial impact of changing policies, the narratives around migration in general, and especially "earned settlement", have had a significant impact on mental wellbeing and people's sense of belonging. The Not A Stranger Campaign survey also found that



- The vast majority reported high levels of frustration (80%), worry (79%), anxiety (75%), and feeling isolated (47%), alongside low levels of hopefulness, resilience and determination
- 81% of the cohort do not believe the immigration system treats all migrants equally
- 92% of respondents believe the way people talk about immigration has changed for the worse
- 69% believe the current climate makes them question whether they want to stay in the UK long term

We therefore argue that consistency for people already in the system should take precedence, at a minimum. Responsiveness to labour market needs should be applied prospectively, with transitional protection for those already here. Fundamentally, we oppose any measures that would make migrant workers more insecure, including the 'earned settlement model'.

7. Recommendations

We recommend that the government scrap its proposed approach to work migration in its May 2025 immigration white paper '[Restoring control over the immigration system](#)', including the '[earned settlement model](#)'. Specifically, we recommend that the government:

1. Give workers on shortage visas the right to change employer and sector without losing lawful status.
2. Allow dependants on shortage visas, without conditions that increase employer leverage, and provide a clear route to settlement.
3. Create safe reporting mechanisms with a firewall between labour enforcement and immigration enforcement, so workers are not punished with visa curtailment for reporting
4. Loss of status should be treated as a systemic failure to be remedied, not an individual failing that must be penalised, with accessible pathways to regularisation for all those who have been irregularised.

At minimum, migrant workers should be protected from constantly shifting rules, which complicate navigating the immigration system and make it far easier for them to lose their immigration status

7. Further Reading

- Not A Stranger Campaign Report, '*Earned Settlement: Hostile Immigration Reforms*' March 2026, available at: <https://migrantsrights.org.uk/wp-content/uploads/2026/03/Report-Not-a-Stranger.pdf>
- Justice for Carers Report, '*Settled Plans, Uncertain Futures- Impact Assessment on Proposed Changes to UK Earned Settlement (ILR) Pathways for Migrant Care Workers*'



and Their Families', May 2026, available at: <https://contact-mp.justice-for-carers.workers.dev/reports/full-report.pdf>

- Joint Briefing - Reunite Families + 40 Organisations, 'Earned Settlement Joint Briefing for the Minister for Migration', October 2026, available at: <https://reunitefamiliesuk.co.uk/wp-content/uploads/2026/10/Earned-Settlement-Joint-Briefing-for-the-Minister-for-Migration-FINAL-1.pdf>

Migrants at Work and Migrants' Rights Network hold further evidence and case studies. If the Committee requires further information, would like oral evidence or wishes to arrange a meeting please contact sylvie@migrantsatwork.org or policy@migrantsrights.org.uk.