

# Modern slavery in the care sector

Wendy Sims

Programme Manager – Modern slavery

Sandwell Council



# Objectives

To increase awareness about modern slavery in the UK care sector, with a focus on international recruitment.

To share the insights and strategies developed by Sandwell Council in addressing this issue.

# Concerns

## Shortage of Qualified Workers on Skilled Worker Visas and Its Impact on Safeguarding in the Care Sector

- **Shortage of Qualified Workers:** The care sector grapples with a shortage of qualified workers eligible for skilled visas, posing significant safeguarding challenges.
- **Strain on Existing Staff:** Limited availability of skilled workers strains current staff, potentially compromising care quality.
- **Hiring Inexperienced Personnel:** To fill gaps, there's a risk of hiring less-experienced or inadequately trained staff, raising the risk of substandard care and jeopardising recipients' safety.

## Exploitation and Destitution Risks Among Care Workers on Visa Sponsorship

- **Dependence on Care Worker Visas:** The care sector heavily relies on care workers holding visas.
- **Exploitation of Care Workers:** This dependence has led to widespread exploitation of care workers on these visas.
- **Risk of Destitution:** Possible license revocation poses a risk of destitution for these workers.
- **Exploitative Practices:** These practices, such as low wages and poor conditions, violate workers' rights.
- **Impact on Care Quality:** These practices also harm care quality for patients and residents.





# What has Sandwell done so far

- Modern slavery awareness session with all domiciliary care providers
- Spotlight session on modern slavery in the care sector
- Response to the chief of border force call for evidence
- Awareness sessions/presentations
- Local risk and threat grid as part of organised crime
- Working with Immigration/GLAA/CQC
- Prepared cease and desist letters
- Draft clauses that need sense checking and finalising before going to Legal for their input prior to inclusion in any (current or future) contracts
- Draft Questions for the selection questionnaire for future tenders that again need sense checking and finalising before going to Legal.
- Prepared a guide to help various teams look through a modern slavery lens

## Key indicators and red flags of modern slavery in the care sector:

Recognising the signs of modern slavery is crucial for effective intervention. Local authorities, including Sandwell Council, should be vigilant in identifying potential cases. Key indicators and red flags in the care sector may include:

**Excessive Fees:** Skilled care workers charged exorbitant fees for recruitment, accommodation, or transportation to the UK.

**Low Wages:** Care workers receiving wages well below the legal minimum wage, considering the long hours worked.

**Confiscation of Documents:** Employers or recruiters withholding identification documents, passports, or visas to control workers.

**Overcrowded Accommodation:** Care workers residing in overcrowded and substandard housing provided by their employers.

**Inadequate Rest and Breaks:** Workers denied adequate rest breaks, working long hours with little time off.

**Language Barriers:** Workers with limited English language skills facing difficulties in asserting their rights or seeking assistance.

**Isolation:** Care workers being isolated from the broader community, including limited social interactions or freedom to leave their place of work or residence.

**Fear and Coercion:** Workers expressing fear, anxiety, or signs of psychological distress, often due to threats or coercion.

# Scams to look out for

To enhance awareness among local authorities regarding potential scams, it is essential to be vigilant throughout the immigration and, where applicable, professional regulation processes during the recruitment journey. A comprehensive understanding of the process, including its timelines, associated costs, and what constitutes fair charges, is crucial.



**Fee Scam:** This involves the payment of exorbitant fees to secure a health and social care job in the UK.

**Contract Scam:** Be cautious of contracts that contain excessive and unreasonable repayment clauses, which mandate you to reimburse a significant sum if you leave your job within a specified timeframe.

**Job Scam:** Watch out for situations where the actual job in the UK differs substantially from what was initially promised. For instance, poor working conditions with extended working hours for minimal compensation.

**Visa Scam (Student Visa):** Beware of attempts to secure a full-time health or social care job in the UK while holding a student visa, which typically restricts working hours to 20 per week. This may be an effort to bypass the stringent checks required for legal employment in the UK.

**Visa Scam (Impersonation):** Exercise caution if you are contacted by someone posing as a representative from the UK Visa and Immigration office, insisting on unpaid visa costs. Official organisations do not make unsolicited calls or send emails requesting money or personal banking details.

**Fraudulent Document Scam:** Some entities may claim to guarantee a 100% pass rate on your language exam, offer to alter your scores, or provide a fake qualification certificate in exchange for a fee. It is strongly advised not to engage in such activities, as you may risk losing your money or facing exposure.

**Identity Scam:** Refrain from sharing sensitive information like your age, birth date, or bank account numbers with agencies or employers, as this data can be exploited for identity theft.

# Sandwell examples

## Case 1: Licensing and Compliance Failure

- **Situation:** 191 individuals brought to the UK with insufficient work provided.
- **Action:** Home Office revoked the license due to multiple concerns including authenticity of job offers and compliance with sponsor duties.

## Case 2: Organised Crime and Labour Exploitation

- **Situation:** Referral due to exploitation suspicions, with links to organised crime.
- **Action:** Ongoing investigations to disrupt the crime group's operations.

## Case 3: Money Laundering and Fraud Links

- **Situation:** Potential labour exploitation case referred, related to broader financial crimes.
- **Action:** Comprehensive investigation underway with intelligence gathering.

## Case 4: Sponsorship Non-compliance

- **Situation:** Sponsorship team referral; 215 workers affected by salary and recruitment issues.
- **Action:** License revoked to ensure protection of workers' rights.

## Case 5: Suspended License Due to Recruitment Issues

- **Situation:** 654 workers impacted by dubious recruitment practices.
- **Action:** License suspension and investigation into the authenticity of job vacancies.

## Case 6: Illegal Work and Fake Documents

- **Situation:** Employment of workers with fraudulent visas, linked to a known individual with a history of recruitment offences.
- **Action:** Legal actions and investigations into the network behind the fake documentation.

## Case 7: Exploitation and Deception in Recruitment

- **Situation:** Concerns raised by CQC about the sale of Certificates of Sponsorship and extortion of candidates.
- **Action:** Investigations into international money transfers and efforts to dismantle the secrecy surrounding the operations.

**Mandatory Work Hours:** Each worker is to be provided with a minimum of 39 hours of work per week.

**Annual Salary Requirement:** The expected annual salary for these workers is at least £24,000 to meet fair wage standards.

examples

$191 \times 24000 = 4,584,000$  – around £78,000 in their reported accounts

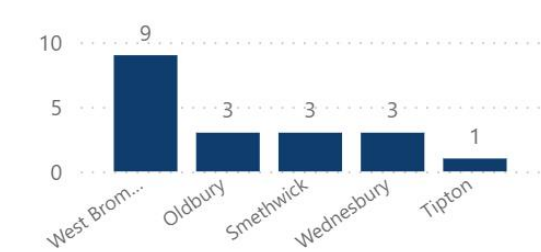
$654 \times 24000 = £15,696,000$  – less than £7000 in their reported accounts

# Care sector

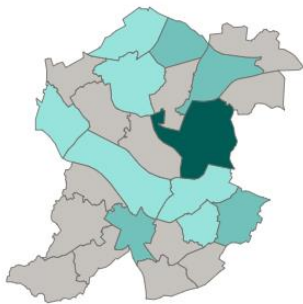
Care sector Locations



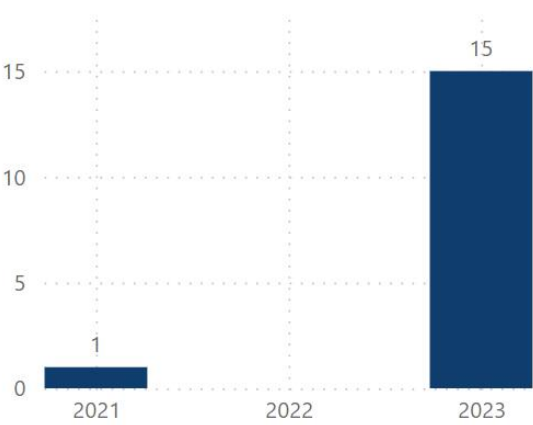
Immigration crime by town



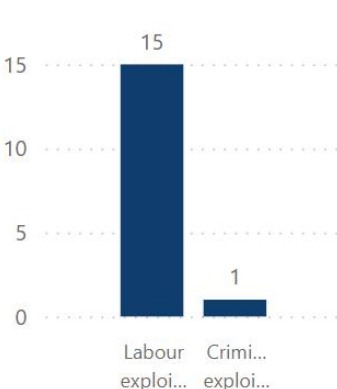
Care sector by ward



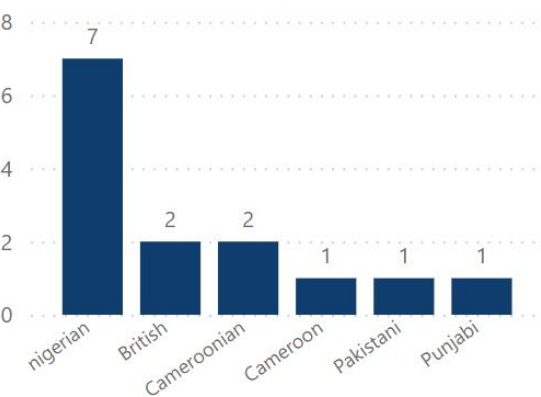
Care sector referrals



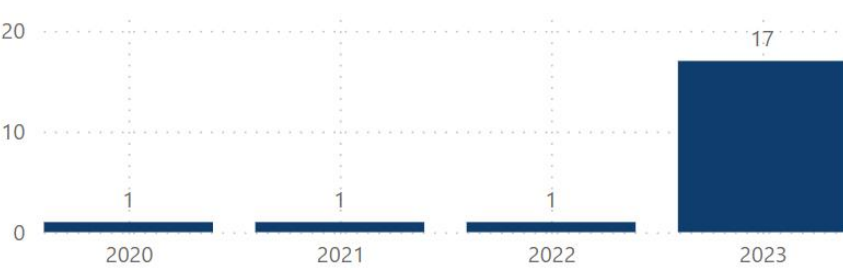
Care sector modern slavery type



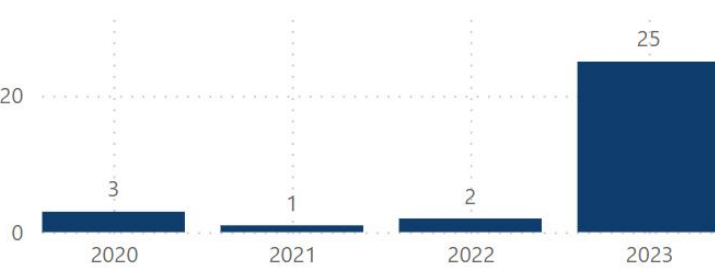
Care sector by nationality



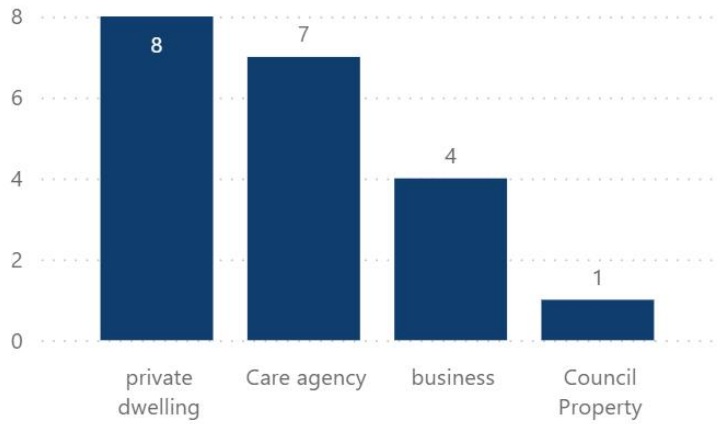
Multi agency visits for Care sector



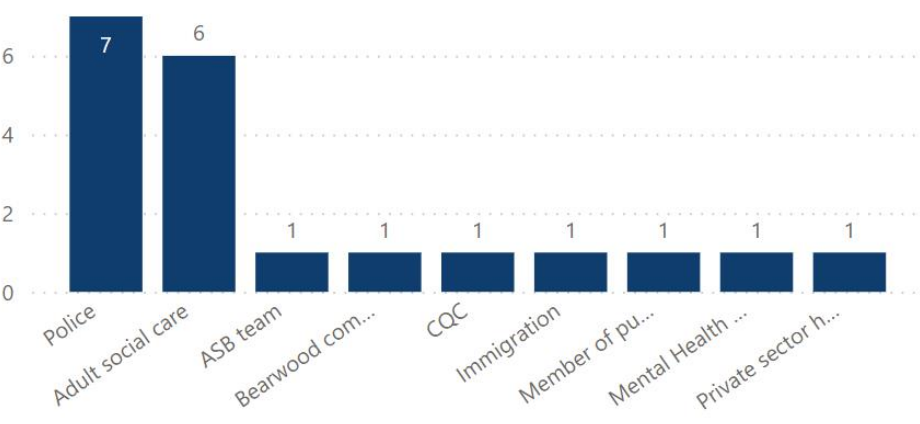
Number of agency interventions



Type of location



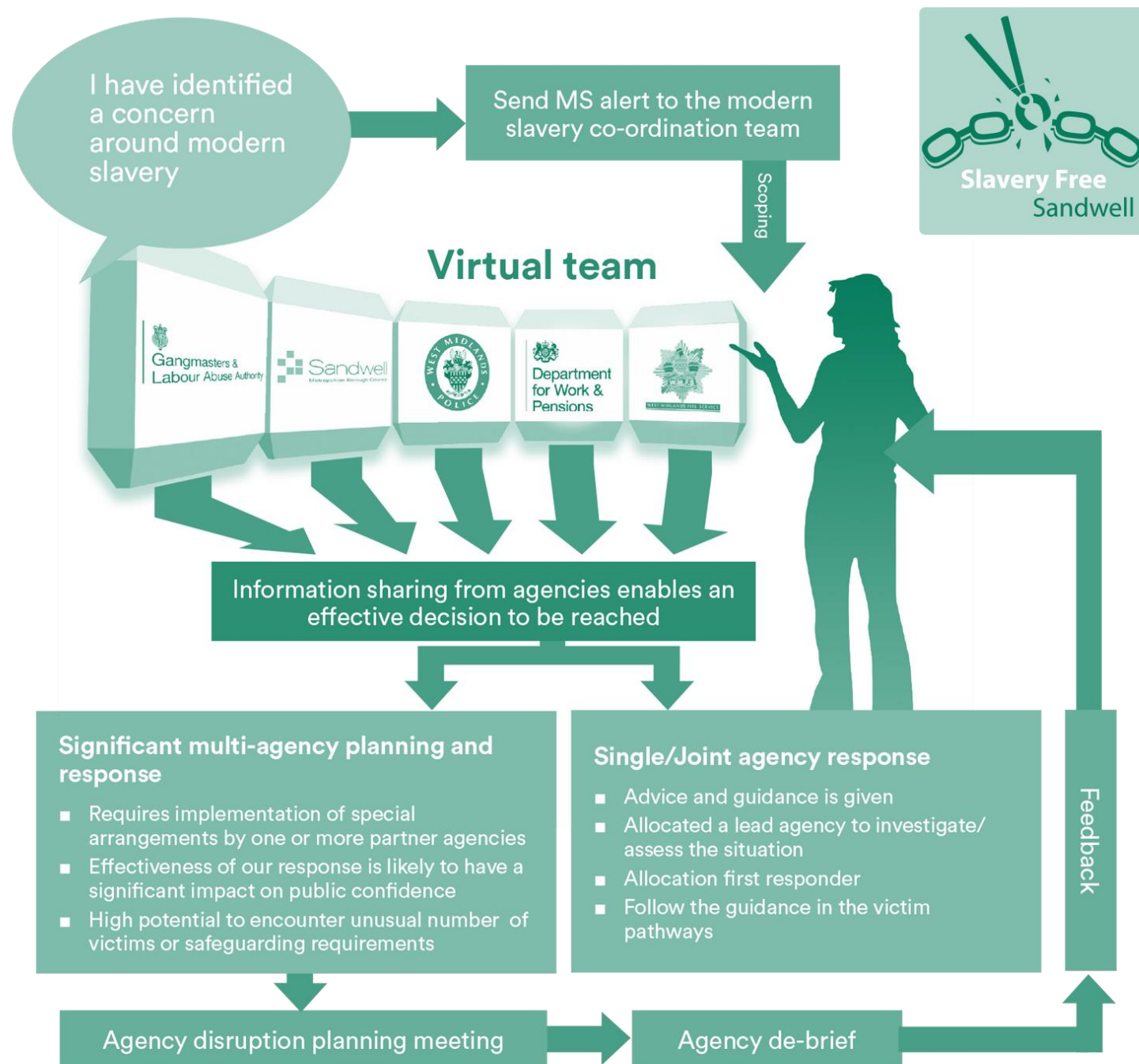
Referral from



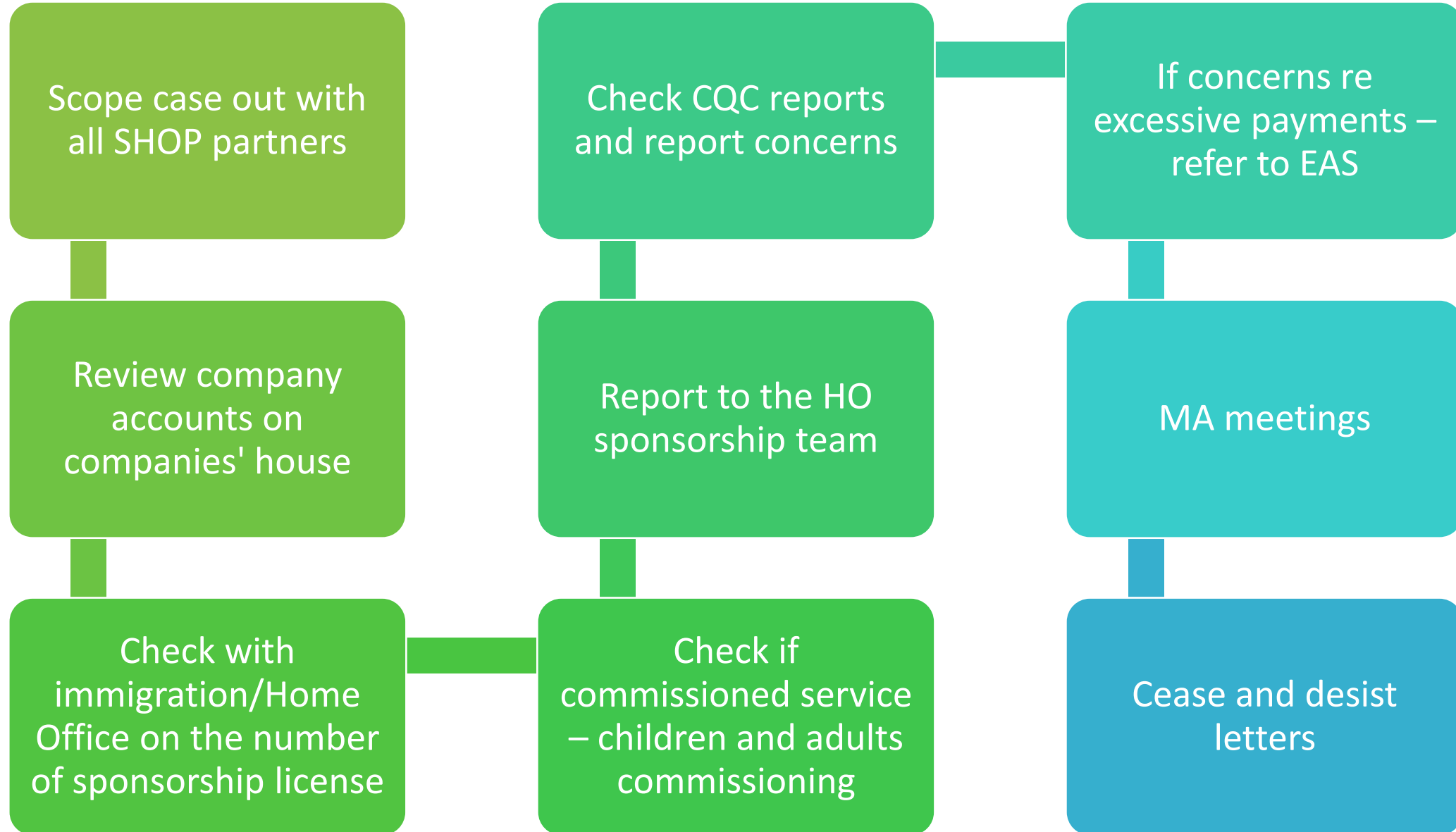


## Slavery and Human Trafficking Partnership

- **Virtual Scoping Process:**  
Gather intelligence to determine if a significant multi-agency response is necessary.
- **Agency Disruption Planning:**  
Strategize and plan actions to disrupt any modern slavery activity identified.
- **Tactical Advice and Briefings:**  
Provide tactical guidance and briefings to all participating agencies involved in the response.



# Sandwell Process



# Key Agencies and Actions: Addressing Concerns in the care sector

## GLAA (Gangmasters Labour Abuse Authority)

- Investigate labour exploitation and violations.
- Collaborate with SHOP.
- Enforce labour laws.

## Police

- Investigate modern slavery reports.
- Collect evidence.
- Issue cease and desist orders where appropriate.
- Collaborate with SHOP.

## HMRC (Her Majesty's Revenue and Customs)

- Review financial records.
- Investigate pay practices.
- Cooperate with law enforcement.

## Immigration Authorities

- Investigate immigration violations.
- Assess immigration status.
- Provide support.

## Local Authority

- Coordinate responses.
- Provide support services.
- Issue cease and desist orders where appropriate.

## Adult/Childrens social care

- Review contracts for compliance.
- Terminate contracts if necessary.
- Support potential victims.
- Conduct Human Rights assessments.

## UK Sponsorship Team

- Address sponsorship violations.
- Take legal actions, including license revocations.

## EAS (Employment Agency Standards Inspectorate)

- Investigate illegal fees.
- Take enforcement actions.

## CQC (Care Quality Commission)

- Assess care quality.
- Take regulatory actions.

## Jobs Aware

- Support affected workers.
- Investigate job scams.
- Take necessary actions.





- **Over 20 Collaborating Agencies:** A remarkable gathering of 20+ agencies and services came together in solidarity.
- **Dedicated Team:** A dedicated team of over 50 individuals worked tirelessly to make this event possible.
- **69 Skilled Care Workers Attended:** A total of 69 skilled care workers, facing various challenges, were in attendance.
- **Comprehensive Support:** Attendees received comprehensive assistance, including:
- **Advice and Assessments:** Guidance, support, and assessments to understand their situations better.
- **Multi-faceted Assistance:** Services ranging from housing, health, immigration, human rights, and exploitation screenings to scams awareness and financial advice.
- **Welfare Provisions:** Crucial welfare provisions, including food, clothing, and shopping vouchers, were provided.

This collaborative effort aimed to provide vital support to skilled care workers facing various challenges, ensuring their well-being and addressing their needs.

Welfare  
hub



# Lessons learnt

- **30% Local, 70% Beyond:** While 30% of attendees were from Sandwell, a significant 70% came from locations outside the area.
- **Financial Vulnerability:** 8 individuals disclosed they paid substantial sums (an average of £42,000) to come to the UK. However, many were reluctant to share full details due to fears of repercussions.
- **Employment Challenges:** 15 individuals had worked, primarily part-time (around 20 hours), and are currently facing financial difficulties. In contrast, 54 individuals have never worked and are experiencing destitution.
- **Referrals to NRM:** 3 individuals were referred into the National Referral Mechanism (NRM) for further support and assessment.
- **Skills and Qualifications:** 95% of attendees were assessed by the WMCA possessed the skills and qualifications necessary for employment in the care sector.

Ashford

Bedford

birmingham

Isle of White

Kent

Lancashire

Leeds

London

Manchester

Oswestry

Sandwell

Sandwell

Scotland

Shropshire

stoke

Telford

Wales

Walsall

Wolverhampton



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Email to request a copy of the guide

[Wendy\\_sims@sandwell.gov.uk](mailto:Wendy_sims@sandwell.gov.uk)

