

Royal College of Nursing Parliamentary Briefing: Debate on Report from the Modern Slavery Act 2015 Committee: 'The Modern Slavery Act 2015: becoming world-leading again' on 28th March 2025

With a membership of over half a million registered nurses, midwives, health visitors, nursing students, health care assistants and nurse cadets, the Royal College of Nursing (RCN) is the voice of nursing across the United Kingdom and the largest professional union of nursing staff in the world.

1. Background

- 1.1 In October 2024, the Modern Slavery Act (2015) Committee published a reportⁱ which found that the UK's protections against modern slavery had not kept pace with developments internationally, and that the Act had been undermined by subsequent immigration legislation that restricted access to the support infrastructure it introduced. The RCN strongly opposed the passage of the Illegal Migration Act (2023), arguing that it presented a serious risk to modern slavery prevention and undermined the role that nursing staff play in identifying victims and completing trafficking referrals.ⁱⁱ
- 1.2 The House of Lords' Modern Slavery Act (2015) Committee report acknowledged the role of the sponsorship system in labour abuse in the social care sector, citing testimony from the Gangmasters Labour Abuse Authority (GLAA) that that visa-related threats featured in "nearly every investigation" the Agency was conducting in the sector.ⁱⁱⁱ The Migration Advisory Committee (MAC) has also recognised the increased risk of exploitation where the ability of migrant workers to switch employers is restricted, and for live-in-workers in particular the MAC have recommended that sponsorship should be provided by an umbrella body rather than individual employers.^{iv}

2. Exploitation experienced by nursing staff

- 2.1 The RCN is deeply concerned by increasing member reports of unethical and exploitative employment practices internationally educated nursing staff have faced whilst working in the care sector. These include reports of repayment fees as high as £25,000; wages being withheld; fraudulent job offers; illegal work finding fees; and pressure to sign exploitative contracts under threat of sponsorship withdrawal.
- 2.2 Since 2020, the RCN has received a significant increase in reports from members on the use of excessive repayment fees and exploitative conditions. Repayment fees are costs levied against workers when they attempt to leave their employment before a specified time. RCN members have reported repayment fees of up to £25,000, with fees being required to be paid with up to six years of employment. Another member recounts how they were asked to pay £9,000 in a single instalment. The member requested a payment plan which the employer refused, and they were told to pay by a certain date and time or risk having their visa revoked.

- 2.3 The Gangmasters Labour Abuse Authority (GLAA) reports that allegations of modern slavery from the adult social care sector have risen 400% since 2022.
- 2.4 In June 2024, the RCN called for a government led investigation into labour exploitation within the social care sector. In response to our calls, the then Shadow Home Secretary, Yvette Cooper, committed to an investigation into the treatment of migrant workers in the social care sector, to be led by the Fair Work Agency. Regrettably, the government has still not commenced work to undertake an investigation.
- 2.5 This month, the RCN wrote to the Home Secretary urging the government to speed up the promised investigation. The investigation cannot be delayed until the new Fair Work Agency is operational, which will be spring 2026 at the earliest.

3. Exploitation and the work sponsorship system

- 3.1 The RCN is concerned that the current requirement for Skilled Worker visa holders to obtain a Certificate of Sponsorship can exacerbate the already unequal relationship between many migrant workers and their employers and in some instances has been used by employers to threaten staff with deportation. While employers do not have the ability to directly deport staff, they are able to trigger a process which would see migrant workers' right to remain in the UK removed if they are unable to find a new sponsor within 60 days.
- 3.2 Multiple RCN members have reported that their employers have threatened revoking sponsorship when issues and disagreements have arisen, including pressure to withdraw workplace grievances. One member reported being instructed to work on days that they were not contracted to. When the member raised their concerns, the employer told them that they had to comply, as "we sponsor you".
- 3.3 The RCN believes that increasing the 60-day curtailment period that workers have to find a new sponsor to 180 days, as is the case for the 'Skills in Demand' visa in Australia, would partly address this issue. Under the Australian system staff are permitted to work in any occupation during this time which helps to alleviate financial hardship.
- 3.4 The RCN's position is that a full review of the visa sponsorship system by government is required, with consideration of alternative models to protect vulnerable workers from exploitation and the weaponisation of their immigration status.
- 3.5 Regional international recruitment partnerships have been established by DHSC to assist migrant care workers who have lost their jobs as result of their employer's visa sponsorship license being revoked. The GLAA estimates that around 34,000 migrant care workers have been impacted by sponsorship licence revocations by the Home

Office. The Home Office must ensure that local authorities are provided with sufficient information regarding licence revocations in their area to enable an effective response.^v

4. The RCN is calling for:

- 4.1 An urgent, government-led investigation into exploitation in the care sector. This investigation should establish the scope and extent of exploitation in the sector and inform the strategy for the Fair Work Agency to eliminate it.
- 4.2 For the Gangmasters and Labour Abuse Authority's (GLAA) remit to include statutory powers to regulate labour provision in the care sector. Once it's established, these powers would be transferred to the Fair Work Agency.
- 4.3 For UK Government to review the sponsorship system for the Health and Care Worker visa, where staff are sponsored by a specific employer, to evaluate the risks it poses for exploitation and explore alternative models.
- 4.4 The creation of the Fair Work Agency must ensure that labour market enforcement is independent from immigration enforcement. For labour market enforcement to be effective it is vital that migrant workers feel able to come forward and have safe reporting pathways. Immigration data should never be shared without the informed consent of workers and immigration enforcement action should never be carried out alongside labour inspections.

5. Suggested questions for the debate

- 5.1 Can the Minister update the House on progress to on establishing a government led investigation into exploitative employment practices within the social care sector?
- 5.2 What assessment has the Minister made of increasing reports of exploitative employment practices as raised by the Royal College of Nursing?
- 5.3 What support is the government providing to local authorities, in addition to current international recruitment partnerships to support migrant care workers who have lost their jobs as a result of their employer's visa sponsorship being revoked?

ⁱ [UK's response to modern slavery has not kept up with the advances of other nations - Committees - UK Parliament](#)

ⁱⁱ [Royal College of Nursing \(RCN\) Parliamentary Briefing: Illegal Migration Bill | Royal College of Nursing](#)

ⁱⁱⁱ [House of Lords - The Modern Slavery Act 2015: becoming world-leading again - Modern Slavery Act 2015 Committee](#)

^{iv} [Migration Advisory Committee: annual report, 2022 - GOV.UK](#)

^v [Immigration: Skilled Worker visas - NAO report](#)