PUBLIC LETTER

Horticultural Sector Committee,
House of Lords,
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Sent by email: hlhorticulture@parliament.uk

Cc:
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12 March 2024

Dear Committee members

Government response to the House of Lords, Horticultural Sector Committee- Report of session 2022-23

The Worker Interest Group is a coalition of 9 not for profit organisations based in the UK that are actively supporting and representing or proactively engaging with seasonal horticultural workers under the UK's Seasonal Worker visa.

We, as some members of the group, are writing to raise queries on aspects of the government response to the House of Lords Horticultural Sector Committee Report of session 2022-23, published February 2024. For ease of reference we have included in full the relevant Committee recommendations (in red), the government response to each (in blue) and below (in black) each of our comments. We ask the Committee to raise these with Defra and any other stakeholders that the Committee thinks is relevant.

> Recommendation 33: The Government must publish its review of the seasonal worker route, as promised in response to the Independent Chief Inspector of Borders and Immigration's December 2022 report. It must also respond to the Migration Advisory Committee's latest Review of the Shortage Occupation list. (Paragraph 213)
>
> *The Government will publish the reviews of the scheme for 2020-22 in due course and is carefully considering the MAC's review of the SOL.*

The only published full review of the scheme is of the 2019 pilot. This was published on 24 December 2021. Reviews are outstanding for the years 2020, 2021, 2022 and 2023. During this time the scheme has been extended and

expanded to nearly twenty times its original size during the pilot phase, from under 3,000 visas being available in 2019 to up to 55,000 in 2024. It is unclear why the publication of these reviews continues to be delayed and we are concerned to note - see below - that in the meantime Home Office compliance visits are now engaging a much smaller proportion of workers on farms, and therefore risk presenting a very selective picture of conditions.

There is an urgent need for transparency on the scheme, especially in light of continued evidence of risks for workers who use the route to travel to the UK to support our horticulture industry, and the very low independent representation of these workers. These reviews, together with further scrutiny of risks to workers, should inform the future of the scheme and should be published before any decision is made or announced on the future of the scheme, together with structural changes to address known risks to workers travelling to the UK.

> Recommendation 34: The Government should convene a meeting of retailers and the NFU, with representation from seasonal workers, to discuss the welfare issues raised in this report. (Paragraph 214)
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> *Defra regularly engages with retailers and representative organisations such as the NFU, both individually and in forums on seasonal labour issues. Defra also attends the Seasonal Worker Scheme Taskforce, a multi-stakeholder programme consisting of retailers, growers, suppliers, scheme operators, NGOs, trade unions and non-profits working collaboratively to help safeguard and ensure access to workers' rights in the scheme.*

While the TUC remains on the list of Taskforce participants, trade unions do not attend or participate in the Seasonal Worker Scheme Taskforce. Trade unions are actively seeking meaningful engagement with the relevant government departments and bodies that have the power to effect positive change for workers. Unions are concerned that the government is using the Taskforce as an excuse not to meaningfully engage with relevant stakeholders.

Defra's attendance of meetings with certain groups does not replace the need for regular engagement with stakeholders from across the scheme. The Worker Interest Group has been actively seeking a meeting with the Home Office, and Defra since October 2023, as yet we have not received a response from the Home Office, and have only recently secured a date with Defra. We are concerned that there is no interest from government in meeting organisations offering direct support and representation to seasonal agricultural workers, despite the serious concerns about the scheme's implementation.

Defra attends the Seasonal Worker Scheme Taskforce as an observer. There is a need for government-led, regular engagement with all government institutions with responsibility for the scheme. We welcomed in January 2023 the establishment of a Worker Welfare Group by Defra, engaging the Home Office and a broad range of stakeholders, and regret that despite stating the intention to operate this group on a regular basis, Defra did not hold any further meetings. As outlined at the inaugural meeting of this group, service providing organisations view regular contact with government as essential to safeguard workers and address issues identified by workers with urgency.

> Recommendation 36: The Government must commit to data collection to understand how many seasonal workers will be needed in the UK in the short, medium, and long- term. Once these figures are collected, a seasonal workers workforce plan should be published detailing how many visas are needed and how many the Government expects to make available for the next 5, 10 and 20 years. (Paragraph 233)
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> *The government is currently considering the recommendations from the Independent Review into Labour Shortages in the Food Supply Chain, including the recommendations concerning access to migrant labour and to produce a workforce data strategy. The government response will be published in early 2024.*

The Independent Review into Labour Shortages did not collect data as to actual jobs available. Evidence of the need for labour and the ability to provide sufficient amounts of work should be a prerequisite to issuing visas.

It is important to note that historically, grants of entry clearance for workers on the scheme have not met the full quota of visas available. This suggests that the quota is already higher than the actual demand for workers. Without checks

to ensure that work is available there are risks that workers migrate without being able to secure the work they were counting on to make the migration financially viable. For example, according to the Home Office's own data releases;[1]

- 34,484 grants of entry clearance were made in Q1-Q4 of 2022, when the visa quota was 40,000.
- 32,724 grants of entry clearance were made in Q1-Q4 of 2023, where the visa quota was 45,000 plus an additional 10,000 visas if undefined conditions were met.

At present, while workers in general continue to pay the costs of migration (despite widely accepted international guidance that employers should cover all costs) and there is no obligation to provide them with a minimum amount of work or income during a season in the UK, there is a high risk that workers may be encouraged to migrate without certainty that there is enough work available. An additional safeguard to workers would be for industry actors across the supply chain to pay their migration costs and guarantee workers' income during their season in the UK, including if work is not available. This would help ensure that workers would not travel unless there was enough work for them to do in the UK.

> Recommendation 37: Even if there is flexibility on the exact number of visas available, the Government must guarantee the existence of the seasonal workers scheme, in principle, for five years at a time, as per the recommendation made in the Independent Review of Labour Shortages in the Food Supply Chain. The Government must communicate any changes to the scheme in good time to allow scheme operators and growers to plan ahead and to communicate with incoming seasonal workers. (Paragraph 234)
>
> *The government is currently considering the recommendations from the Independent Review into Labour Shortages in the Food Supply Chain, including the recommendation concerning access to migrant labour. The government response will be published in early 2024.*

As explained above, without guarantees of income or work during their time in the UK, and particularly when migrant workers are incurring the costs of migrating, it is important that the number of visas issued needs to be linked to the demand for workers in practice and guarantees that work is available. If work is cancelled after workers have migrated, the workers - who have kept their side of the commitment - should be compensated. It is not right that migrant workers bear the financial risks embedded in the scheme when their bargaining power is comparatively much lower than the organisations and entities ultimately benefiting from their work.

Risks of exploitation for workers who travel to the UK on the horticultural Seasonal Worker visa were predicted prior to the Pilot scheme in 2019. Since the scheme has been in operation there has been a wealth of evidence, including from the government evaluation, ICIBI inspection as well as independent sources that these risks remain and that the small changes to the scheme such as the 32 hours paid work a week while in employment have not done enough to mitigate the wider structural issues. In January 2024, ATLEU announced that it had brought a legal challenge against the UK government on the grounds that the scheme breaches Article 4 of the European Convention on Human Rights. A restructure of the scheme centred on addressing the risks to workers is a prerequisite to its extension. Key to this is not only removing the financial risk from workers but ensuring that, as recommended by the ICIBI, statutory responsibilities for the scheme are made clear and there is independent and regular monitoring and enforcement of scheme rules and UK laws.

> Recommendation 38: To lower recruitment and training costs to growers, increase efficiency, and to retain and attract talent on UK farms, the seasonal worker scheme visa should be extended to nine months, and employers should bear the consequent cost of the NHS surcharge incurred after six months. (Paragraph 235)
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> *The government is currently considering the recommendations from the Independent Review Into Labour Shortages in the Food Supply Chain, including the recommendation concerning access to migrant labour. The government response will be published in early 2024.*

[1] https://www.gov.uk/government/statistical-data-sets/immigration-system-statistics-data-tables#entry-clearance-visas-granted-outside-the-uk

When considering access to migrant labour it is vital that the government listens to and learns from the experiences of migrant workers who have used the scheme to date. Structural changes are needed to make the scheme safe and fair for workers. Adding the option to apply to renew or to extend the visa in-country subject to ongoing employment would help increase the earning potential from the migration journey for workers, as well as meet ongoing industry demands for experienced workers.

> Recommendation 39: The GLAA must, as a priority, re-establish confidence with industry that it competently applies due diligence in the licensing of overseas labour recruiters in accordance with its own guidelines. It must define legal requirements country by country and inspect against these, ensuring that there is a sustainable
> operational and commercial model in place that does not involve charging recruitment fees to workers, inappropriate sub-contracting, or the use of unlicensed gangmasters. (Paragraph 244)
>
> *The GLAA recognises that more prevention activity would help to ensure that workers sourced from overseas are not being exploited. As part of our approach, the GLAA has published guidance for businesses who wish to source workers from overseas and worked with key stakeholders to deliver information to potential workers. We are also working with the IOM and the FCDO to identify legitimate government backed schemes which are compliant with the licensing scheme for UK based businesses to access when operating overseas. We have also put MOU's in place with key countries to ensure that workers are sourced from legitimate businesses. However, the GLAA has no powers to inspect against the requirements of other countries or to investigate unlicensed trading outside of the UK. It would not be appropriate for the GLAA to provide advice on compliance with non-UK law.*

At present, there is little standardisation or oversight of migrant worker recruitment practices. While origin state governments have a responsibility to more effectively regulate recruitment, destination countries, in this case the UK, are best placed to intervene in the recruitment market, to ensure that migrants can access jobs without paying fees. In the case of the Seasonal Worker visa it is clear that illegal fees and charging, as well as misinformation about the scheme, continue to be a problem, increasing the financial risks placed on workers and increasing their vulnerability to exploitation while in the UK and longer term exploitation due to large debts.

While we understand some confidential and unpublished MOUs have been agreed between the Gangmasters and Labour Abuse Authority and Governments of Countries of Origin, these should not replace legally binding bilateral labour migration agreements (BLMA) between States. The UK must learn from countries such as Canada and South Korea, in establishing BLMAs with countries of origin governments, that should, inter alia, be grounded in international human and labour rights standards; guarantee equality of treatment and non-discrimination, provide access to justice and safeguard human rights, ensure prevention of violence and harassment, exploitation or abuse including gender based violence, ensure health and safety standards are upheld, ensure fair and ethical recruitment, promote information sharing and identify responsible authorities for enforcing rights and entitlements for migrant workers in the UK. The development of BLMAs should be carried out in a transparent manner and include consultation with civil society organisations and trade unions, and they should be publicly available to migrant worker organisations. See the United Nations Network on Migration for detailed guidance in relation to BLMAs. The ILO also has guidance on fair recruitment, including definitions of fees and costs of recruitment that is important in this regard.

> Recommendation 42: Reforms should be made to how seasonal workers are taxed to allow them to retain more of their earnings. A dedicated seasonal workers' tax code should be introduced under which no income tax is levied until the worker has reached the annual tax threshold. The pension auto-enrolment and National Insurance enrolment obligations should be removed. Employer National Insurance should be allocated to refund the costs of visa and travel for seasonal workers. (Paragraph 250)
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> *Saving for retirement is a crucial right for all qualifying workers across the UK economy and applying exemptions to the automatic enrolment (AE) duties would undermine the success of workplace pensions. There is already a 3-month postponement period to help minimise burdens for employers with short-term workers. We have no plans to remove seasonal workers from AE and the benefits of pension saving.*

HMRC provides an arrangement for certain agricultural workers ('harvest casuals') where employers do not have to deduct income tax when they pay harvest workers for two weeks or less or fourteen non-consecutive days in any tax year. This arrangement does not provide employees with a tax exemption but is intended to help employer administration. For employers taking on harvest workers for longer than two weeks, they will need to operate PAYE as normal in line with other sectors.
Employers are still required to report payments of earnings to HMRC where employee or employer National Insurance is due or where the earnings help the seasonal worker build entitlement to contributory benefits or the UK state pension.
For fairness with other workers, it would not be right to remove liability to income tax and National Insurance for seasonal workers from their earnings.

The Seasonal Worker visa scheme provides workers with a six month long, non-renewable visa. On this visa workers have no recourse to public funds and are only allowed to work in the horticulture sector in work sourced for them by the Scheme Operator who has sponsored their visa. A smaller number of workers enter on a shorter visa to work in the poultry sector. Workers on the visa are not permitted to apply to renew their visa and their visa does not have a pathway to settlement in the UK. Given these particular restrictions, workers on the Seasonal Worker visa cannot be directly compared to other workers in the UK who are able to work in any sector and who have recourse to public funds, as well as generally having dependents in the UK and a support network that single and short term migrant workers may not have. The pretence that workers on the Seasonal Worker visa have equivalent options and entitlements to other workers in the UK's economy is damaging and prevents common sense changes from being implemented, including to their tax arrangements.

As stated above the scheme needs structural reform to begin to redress these differences and make sure that the visa is safe and fair for workers on the scheme, aligning them with other workers in the UK. However, while workers on the scheme remain temporary and unable to work towards building a base in the UK it is bizarre to ask them to pay towards contributory benefits or income tax/national insurance, the benefits of which (with the exception of primary healthcare) they cannot meaningfully access.

Recommendation 43: To protect the lawful operation of scheme operators' businesses, workers who claim asylum should not be included in the Home Office requirement that 97 per cent of sponsored workers leave the UK at the end of their stay. (Paragraph 255)

The Home Office already takes into account any extenuating circumstances when calculating a Scheme Operator performance against Part 4, Annex C1, hh. of the Sponsor Guidance, including giving due consideration to how any asylum claims impact the calculation of these figures. More broadly however, all Scheme Operators have a duty to ensure that their activities do not pose a threat to the integrity of the UK immigration system. and this includes not generating significant rates of asylum claims or overstaying.

Scheme Operators should not seek to interfere in any way with the UK's international treaty obligations, including those under the Refugee Convention, European Convention on Human Rights and the Council of Europe Convention on Action against Trafficking in Human Beings. We are concerned that the government's response to the consultation implies that Scheme Operators play a role in 'generating' asylum applications which mischaracterises the complex and varied reasons why an individual may decide to seek protection in the UK. It is important to bear in mind that the provision of immigration advice is unlawful unless provided by regulated individuals and organisations under Section 84 of the Immigration Act 1999. Scheme Operators are not regulated under the 1999 Act and it is therefore very important that the Home Office does not risk perversely incentivising them to influence whether or not individuals seek protection or other visa statuses in the UK as this could potentially be unlawful. We recommend that the key performance indicators for Scheme Operators remain entirely separate from individuals' asylum claims.

Recommendation 44: The Government must separate labour inspectorates from immigration enforcement and make clearer the roles and responsibilities of current enforcement bodies including the Home Office. The Government must provide an official source of redress to seasonal workers that is not linked to immigration. (Paragraph 269)

Labour inspectorates and immigration enforcement are not currently combined, and therefore cannot be separated. The Home Office does not operate a labour market inspectorate, rather an immigration compliance function.
Whilst the Home office will always pass on intelligence or concerns of malpractice to the appropriate regulator, and we inevitably work closely with these organisations, it is not the function of UK Visas and Immigration to police the UK labour market. Migrant workers enjoy the same protections under UK law as resident workers.

Under its current structure, and without a clear setting out of responsibilities of the different statutory institutions involved in the Seasonal Worker scheme, labour inspectorates and immigration enforcement remain combined in practice. For example if a worker is dismissed for complaining about working conditions, they risk not being placed in new work by their visa sponsor and having to leave the UK. Without assurances in place as to an ability to switch scheme operators if the first operator loses their licence, workers fear that a work complaint could lead to this outcome. Currently workers have no assurance that work complaints will be dealt with by a labour inspectorate. We welcome the correct assertion above that it is not the function of UK Visas and Immigration to police the UK labour market. However subsequent responses assert that this is what the Home Office is doing, including the assertion in response to recommendation 47 that requiring the GLAA to do spot checks on farms would somehow duplicate the Home Office doing this. Despite UKVI asserting that they have a leading role in worker welfare compliance, support organisations do not currently have any assurances from UKVI of which safeguards they have in place for the inspection of worker complaints, and in correspondence with the Home Office have been directed to the portal for reporting immigration crimes rather than a mechanism which allows labour abuses to be safely raised and addressed.

As requested in the ICIBI's inspection report there is an urgent need for clarity of roles and responsibilities in the scheme. This must include a setting out of responsibility for regular labour inspections and spot checks and enforcement powers around breaches of labour standards which do not undermine the ability of workers to continue working and enable them to access redress.

Recommendation 45: Seasonal workers should be informed of their right to join a trade union during the recruitment process and upon their arrival to the UK and should be signposted to other sources of support. (Paragraph 270)

The organisations who sponsor seasonal migrant workers provide resources to workers during and after recruitment, which includes information on their right to join a trade union.
This is often shared through recruitment presentations, the Just Good Work app, or through information guides which point workers to additional resources, including government websites and helpful contact points.

Government should place a requirement on Scheme Operators that this information, in a language workers understand and can read, be clearly displayed on farms and in worker accommodation, and sets out the contact details for independent support organisations and relevant trade unions. In addition, government guidance to Scheme Operators should set out a zero tolerance policy for repercussions or retaliation against workers who access support services or trade unions.

Recommendation 46: A compulsory welfare spot-check should be introduced between month three and six at farms that host seasonal workers, during which a selection of workers should be interviewed by the GLAA/Home Office to ensure that welfare standards are being upheld on the farm. This interview should be available in the first language of the workers, and it should be made clear that it has no link to their immigration status and is totally anonymous and confidential. Worker accommodation should also be inspected. Inspectors should have the power to fast- track cases of non-compliance with existing labour laws to the relevant bodies. (Paragraph 271)

UKVI compliance staff visit farms primarily to assure Sponsors are adhering to their duties,but to also undertake some welfare checks on sponsored workers by interviewing a sample,checking correct salary paid and undertaking a sample check of accommodation.

Adverse findings on farms or any reports received by the seasonal work team will be reported and assessed against the standards expected of the sponsors. Where appropriate UKVI reports these issues to sponsors and monitors what action is taken to address concerns raised through on-going engagement with the sponsor. During 2023, 124 farms were visited, and 1026 sponsored workers interviewed.

The government's response to recommendation 44 states that "the Home Office does not operate a labour market inspectorate, rather an immigration compliance function." As stated in the second part of this response, when UKVI staff check on salary paid and accommodation this is presumably to check compliance with scheme guidelines rather than standards for workers, and any enforcement action would take the form of licence revocation leading to the loss of work and accommodation for workers, rather than redress. The threat of loss of work will inevitably result in workers being fearful to complain or to speak out. Among other concerns workers do not know how they can report poor working conditions anonymously, fear that reporting issues will jeopardise current earnings and future opportunities to return and work another season in the UK and that this lack of returns option might extend to family and friends, that there will be repercussions to reporting such as less work, worse work, or even a termination of their employment. The restrictive terms of the Seasonal Worker visa which create a dependency on employers mean that it is vital that there are proactive inspections of both employment and accommodation standards and that these are carried out by specialist agencies, not UKVI.

Without secure reporting guarantees, or options for redress, or alternative work, fear of disclosing poor conditions of work to immigration authorities will inevitably affect engagement by authorities with workers on the scheme. Almost 29,000 grants of entry clearance were made to workers to travel to the UK on the seasonal worker visa during the first three quarters of 2023. The number of sponsored workers interviewed in the same period was less than 4% of this. In the interests of transparency and improving oversight of the scheme, it would be prudent to know how these workers were selected to be interviewed, what information they were given about the interviews, how the interviews were conducted and by whom.

Recommendation 47: The GLAA must implement a system of audits, spot-checks and systematic inspections on farms that are part of the seasonal worker scheme. There should be a clear, tiered, enforceable system of penalties for those who fail to enforce labour laws. The Home Office must increase the budget of the GLAA so that it is able to fulfil its function. Some of this budget increase should be ringfenced so the GLAA is able to hire more labour inspectors in line with the number recommended by the ILO. (Paragraph 279)

The Home Office already conducts a system of audit spot check and systematic inspections on farms as part of the Seasonal Worker scheme. Requesting GLAA to fulfil this function would cause duplication. Separately the GLAA has specific powers to investigate modern slavery offences in England and Wales and can take action against businesses who are trading without a licence across the UK.

As stated in this DEFRA response to recommendation 44 and as we have explained above, the Home Office has an immigration compliance function and is not a labour market inspectorate. The DLME among others have recognised that labour market non-compliance risks are high in the agricultural sector. When combined with the vulnerability created by workers entering on visas which restrict their employment options and deny access to public funds it is clear that proactive checks and enforcement of employment conditions are vital. It should be self explanatory that LME functions are completely distinct to and would not duplicate immigration compliance.

While it is correct that the GLAA has specific powers to investigate modern slavery offences and can take action against businesses who are trading without a licence across the UK, it does not currently carry out regular proactive inspections on farms. There is a clear labour market enforcement gap for serious labour breaches which don't reach the threshold of slavery. These include unclear use of productivity targets, pay issues, and circumstances of dismissal.

Recommendation 48: The GLAA must proactively enforce the full payment of the National Living Wage to all seasonal workers for 32 hours a week. If the GLAA does not have the resources to do so, responsibility for this task should pass to HMRC. The Government should update the guidance to specify that this means 32 hours a week for the full six-month season. (Paragraph 281)

The Home Office already proactively enforces the full payment of the National Living Wage to all seasonal workers for 32 hours a week. The Immigration Rules governing the Seasonal Worker route already specify that workers must receive 32 hours pay for each week of their stay in the UK.

As stated above, the Home Office does not have a function to enforce payment of the National Living Wage which is enforced by HMRC. It would be useful to know if there are any cases where compliance with the National Living Wage has been enforced for workers on the Seasonal Worker visa scheme and if these workers have been compensated.

While workers must receive 32 hours pay for each week of work in the UK, they are not usually employed throughout the entire time of their six month visa. There are often delays in employment starting or gaps between jobs. Work may be cancelled or end early and no compensation is provided to workers, and in some cases workers are still required to pay accommodation fees despite having no paid work nor any option to find alternative work. In oral evidence to the EFRA Committee in January 2024, the Association of Labour Providers (ALP) stated that on average, workers on the scheme receive only 21 weeks work. Workers will not be paid if they are not in work and in practice even during periods when workers are in employment, 'piece rate' or productivity targets are often used, with workers expected to pick to a certain productivity target to equal an 'hour's work'.

In February 2023, the Farming Minister announced that from April 2023, workers on the scheme would be entitled to 32 hours of **work** every week (rather than pay). The immigration rules say they will be paid at least £10.42 for each hour worked and receive at least 32 hours pay each week. The sponsor rules say workers will 'receive at least 32 hours paid employment each week'. However, both in the government's response to this recommendation and in recent responses to parliamentary questions[2], the government has intimated that the 32 hours announcement is in effect a guarantee of income, with a requirement that workers be paid for 32 hours, regardless of the work that is actually available. **We support the government's newly adopted position of a 32 hour income guarantee for each week of workers' stay in the UK, but would welcome further clarity about who has ultimate responsibility for paying and enforcing this guarantee, so that this can be practically implemented with immediate effect.**

Recommendation 49: The Home Office should issue new guidance clarifying that all caravans provided for use by seasonal workers must reach BS3632. Local authorities should be given a duty to inspect and enforce both this standard, and health and safety regulations in caravans housing seasonal workers. The new advice should clarify that only caravans with shared living space and single-occupancy bedrooms which reach BS3632 should be eligible for the maximum occupancy charge, which should not exceed the accommodation offset rate. (Paragraph 291)

We will convene relevant departments to discuss this recommendation given it relates to accommodation and marketing standards, as well as different enforcement powers.

It is essential that the government look at regulatory oversight for seasonal worker accommodation given it falls through the gaps of regulation at present. Regular inspection of accommodation is not currently taking place and yet could be part of the role of Local Authorities, Fire Services, the Gangmasters and Labour Abuse Authority (as it relates directly to Licensing Standards), UKVI (as the Guidance for the Scheme references the standard of accommodation) as well as the Health and Safety Executive. It is yet another area where there is no leadership nor clarity on what should be enforced and who is doing the inspection and enforcement. In our discussions with enforcement bodies we have found different authorities are each looking to the other to provide oversight in this area. A wide range of accommodation issues were identified by the Worker Support Centre in 2023, including accommodation that was unsafe for human habitation.

Please let us know if there is any further assistance or information on these matters which would be useful to the Committee. Signatory organisations can be contacted via Kate Roberts on kate.roberts@labourexploitation.org

[2] https://questions-statements.parliament.uk/written-questions/detail/2024-02-16/14386

Yours sincerely,

Focus on Labour Exploitation (FLEX)
Work Rights Centre
FairSquare
Worker Support Centre
Anti Trafficking and Labour Exploitation Unit (ATLEU)
Anti-Slavery International
Trades Union Congress