



# Homecare Association

## Homecare Association Response to National Audit Office Study on Skilled Worker Visas

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**Shaping homecare together**

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## 1. Executive summary

The Homecare Association has responded to questions from the National Audit Office (NAO) about Skilled Worker Visas. We highlight both the benefits and challenges of the current system in addressing skill shortages in the UK's homecare sector. While international recruitment has helped reduce vacancy rates, significant issues remain.

The visa system has been crucial in bringing much-needed workers to the sector. Homecare services employed c. 45,000 new sponsored workers between March 2022 and December 2023. However, recent rule changes have led to a sharp decline in visa applications and approvals. This risks jeopardising the sector's ability to meet growing demand.

Key challenges include:

- Compliance difficulties because the visa system doesn't account for the realities of the homecare sector.
- Normal methods of commissioning and purchase of homecare make it hard to meet requirements for full-time contracts; minimum salary thresholds; and evidence of genuine vacancies.
- Restrictions on dependants for care workers.
- Complex and costly application processes.
- Potential exploitation of international workers.
- Inadequate enforcement of regulations.

The report calls for improvements, including:

- Developing a data-driven approach to managing supply and demand of sponsored care workers.
- Streamlining the application process.
- Increasing flexibility in the sponsorship system.
- Enhancing inspection and enforcement capacities.
- Improving homecare commissioning practices.

Experiences to date highlight the importance of creating a better migration system for the UK's homecare sector. It should address workforce shortages, protect workers, and maintain high standards of care.



## 2. Request for assistance with NAO Skilled Worker visa study

The National Audit Office wrote to the Homecare Association on 23 August 2024 to ask for feedback to support their examination of the points-based immigration system, specifically the Skilled Worker route. As the leading body for homecare providers in the UK, we can offer valuable insights on the effects of the skilled worker visa system in our sector.

Our Workforce Survey 2024<sup>1</sup> informs our response. We collected data from 307 homecare providers in the UK between 13 March and 12 April 2024. These providers serve around 68,000 clients and employ over 38,000 careworkers. We also gathered insights from small and large homecare providers. In addition, we refer to recent data from Skills for Care's report on the size and structure of the adult social care sector and workforce in England<sup>2</sup>.

## 3. Strategic overview

*Has the skilled worker route helped to address skill shortages in the economy?*

*What are the limitations of the current system?*

*Is the system flexible enough to address new or emerging skill shortages across different sectors of the economy?*

Addressing the skill shortages in homecare

*Workforce trends and international recruitment*

Skills for Care data show how important international recruitment is for solving workforce shortages<sup>3</sup>.

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<sup>1</sup> <https://www.homecareassociation.org.uk/resource/workforce-survey-2024.html>

<sup>2</sup> <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/Workforce-intelligence/publications/national-information/The-size-and-structure-of-the-adult-social-care-sector-and-workforce-in-England.aspx>

<sup>3</sup> <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/Workforce-intelligence/publications/national-information/The-size-and-structure-of-the-adult-social-care-sector-and-workforce-in-England.aspx>

## *Workforce growth*

The total number of adult social care posts in England increased to 1.84 million in 2023/24, a 2.6% increase from the previous year<sup>4</sup>. Filled posts increased by 4.2% (70,000 posts) to 1.705 million, the largest increase since records began in 2012/13.

## *Vacancy reduction*

The number of vacant posts decreased by 22,000 (-14.6%) to 131,000 in 2023/24. The vacancy rate for social care (8.3%) is still high, showing ongoing difficulties in hiring and retaining employees. In homecare, the vacancy rate is the highest in all parts of social care. It has reduced from a peak of 13.2% in 2021/22 to 10% in July 2024 (Figure 1).

**Vacancy rate trend**

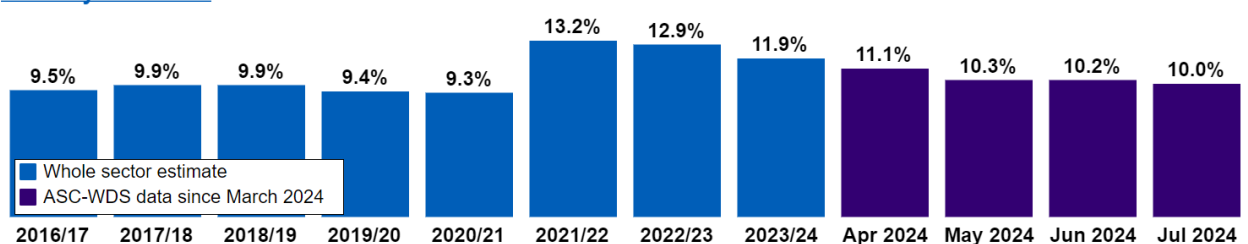


Figure 1: Vacancy rates in homecare services (source: Skills for Care monthly tracking<sup>5</sup>.)

## *International recruitment impact*

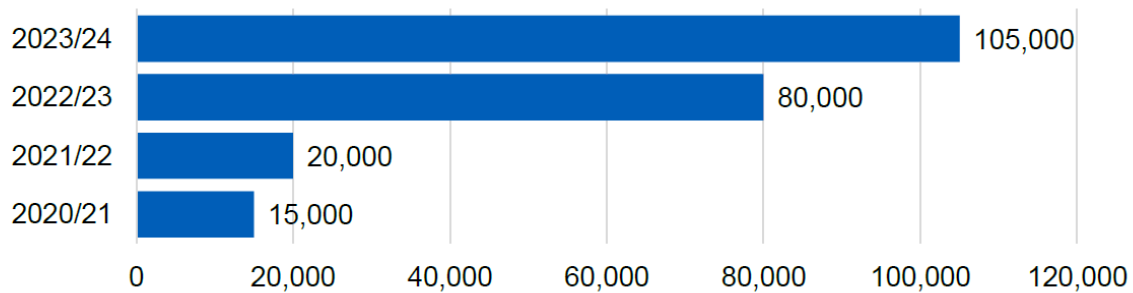
In 2023/24, about 105,000 people arrived in the UK and started direct care providing roles in the independent sector, up from 80,000 in 2022/23 (Figure 2). This means international recruitment accounted for around one in three starters in direct care roles in the independent sector (31.8%). Skills for Care estimates that homecare services employed c. 45,000 sponsored workers (c. 8% of the homecare workforce) between March 2022 and December 2023.

Skills for Care's estimate for the number of international recruits between March 2022 and March 2024 is higher than the Home Office figures. These show the Home Office issued 141,000 Skilled Worker visas to care workers and senior care workers over the

<sup>4</sup> <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/Workforce-intelligence/publications/national-information/The-size-and-structure-of-the-adult-social-care-sector-and-workforce-in-England.aspx>

<sup>5</sup> <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/Workforce-intelligence/publications/Topics/Monthly-tracking/Monthly-tracking.aspx>

same period<sup>6</sup>. The estimate of 185,000 in Skills for Care's report includes some international recruits moving between jobs; people arriving in the UK via other routes such as family permits; and the 141,000 people arriving on Health and Care worker visas.



*Figure 2: Estimated number of people starting direct care providing roles in the adult social care independent sector, having arrived in the UK during the year (source: Skills for Care Size and Structure of the Adult Social Care Workforce, July 2024)<sup>7</sup>.*

### *Decline in British workforce*

Despite the increase in international recruitment, the number of posts filled by people with British nationality has decreased by around 70,000 since 2021/22 (40,000 in 2022/23 and 30,000 in 2023/24). This highlights ongoing challenges with domestic recruitment.

Homecare providers continue to struggle to recruit and retain British workers. Figure 3 shows the key reasons for this.

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<sup>6</sup> <https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-march-2023/why-do-people-come-to-the-uk-to-work>

<sup>7</sup> <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/Workforce-intelligence/publications/national-information/The-size-and-structure-of-the-adult-social-care-sector-and-workforce-in-England.aspx>

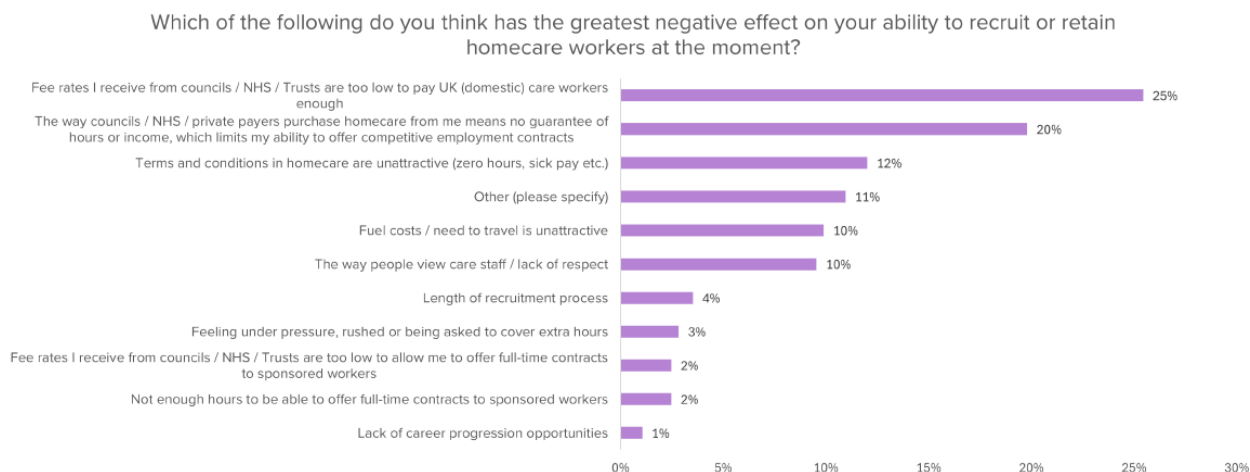


Figure 3: Barriers to recruitment and retention of homecare workers (source: Homecare Association Workforce Survey June 2024<sup>8</sup>).

### Shift in workforce composition

In 2023/24, British nationals held 75% of filled posts (down from 84% in 2021/22); EU nationals held 6%; and non-EU nationals 19% (up from 9% in 2021/22).

International recruitment is helping to meet the rising demand for care amid a shrinking domestic workforce. Many sponsored workers bring valuable skills and experience from their home countries. Turnover rates for sponsored workers are only 16.5 percent, which is less than half that of UK workers. The skilled worker route has partially helped address skill shortages in the social care sector, but significant challenges remain.

### Limitations

- The system's complexity and bureaucracy create barriers for many care providers, especially smaller ones. Over 85% of homecare providers have fewer than 50 employees<sup>9</sup>.
- Recent rule changes have made it very hard to recruit and retain international workers.

<sup>8</sup> <https://www.homecareassociation.org.uk/resource/workforce-survey-2024.html>

<sup>9</sup> <https://www.skillsforcare.org.uk/Adult-Social-Care-Workforce-Data/Workforce-intelligence/publications/national-information/The-state-of-the-adult-social-care-sector-and-workforce-in-England.aspx>

- The system doesn't adequately account for the unique nature of homecare work, particularly regarding methods of commissioning, contracting, fee rates, working hours, and pay structures.
- The salary thresholds are hard to align with the way local authorities commission and purchase homecare. Many buy homecare on a zero-hours basis for contact time only at low fee rates.<sup>10</sup> Homecare providers find it difficult to offer full-time permanent roles at the salary threshold of £23,200 p.a., £11.90 per hour. This is because councils purchase homecare on a zero-hours basis at low fee rates. They also provide no guarantee of hours they will purchase.

## Flexibility

- While the system has shown some adaptability (e.g., adding care workers to the Shortage Occupation List), it still lacks the agility to respond swiftly to emerging shortages.
- According to our survey, almost half of the respondents (48%) can't meet the current demand for homecare services. The main reason cited by 84% of them is difficulty in recruiting. This underscores the ongoing workforce challenges in the sector.

## 4. Rule changes

*What impacts have recent rule changes had on sponsors or applicants? Have businesses found it more difficult to recruit or fill vacancies as a result of changes to the system?*

*How have the rule changes affected different cohorts of applicants / different sectors?*

### Fall in visa applications and granted visas

Following changes to immigration rules in March 2024, the number of Health and Care visas granted decreased dramatically (Figure 4).

The Home Office granted only 3,300 visas in Q1 2024, compared to an average of 26,000 per quarter throughout 2023 (Figure 4). This reduction will have a long-term impact on the care sector because recruitment within the UK remains challenging.

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<sup>10</sup> <https://www.homecareassociation.org.uk/resource/fee-rates-for-state-funded-homecare-2024-25.html>

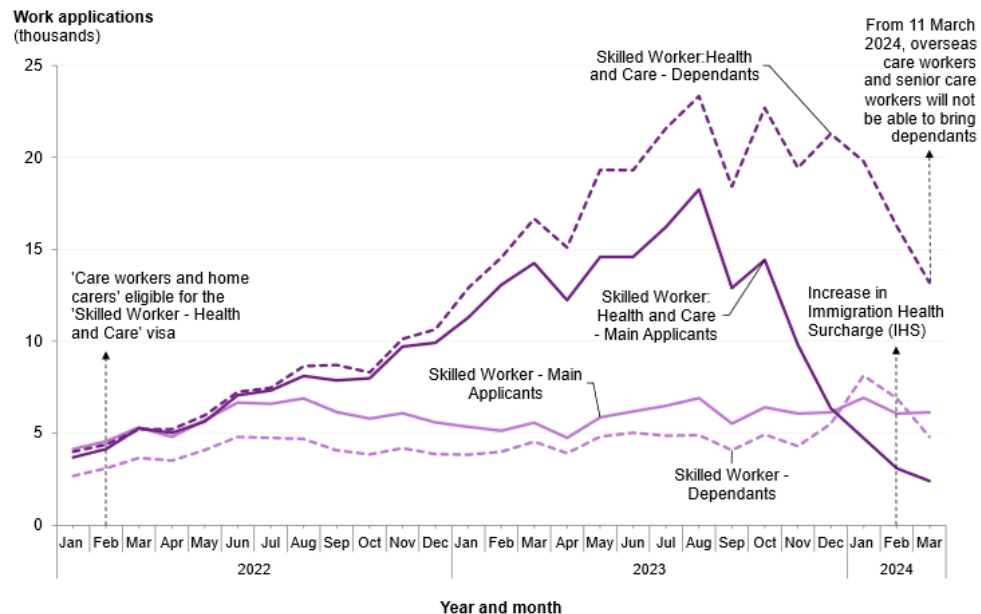


Figure 4: Home Office data on visa applicants (source: Home Office, September 2024<sup>11</sup>.)

The Home Office now wants stronger evidence that providers have work available, or so called “genuine vacancies”<sup>12</sup>.

The new rules also state that only CQC-registered care providers can hire sponsored workers, who may not bring their dependants.

## Impact on recruitment

Since the rule changes, providers have found it harder to recruit sponsored workers. In our Workforce Survey 2024, half (49%) of respondents said they do not employ any workers from overseas<sup>13</sup>. The reasons they gave included:

- Affordability or issues with cost of process (skills surcharge, sponsorship process etc) (29%).

<sup>11</sup> <https://www.gov.uk/government/statistics/monthly-entry-clearance-visa-applications/monthly-monitoring-of-entry-clearance-visa-applications>

<sup>12</sup> <https://www.gov.uk/government/publications/workers-and-temporary-workers-sponsor-a-skilled-worker/workers-and-temporary-workers-sponsor-a-skilled-worker-accessible#:~:text=Genuineness%20requirement,information%20on%20conditions%20of%20stay>

<sup>13</sup> [Homecare-Association-Workforce-Survey-2024 \(12\).pdf](#)



- UK Visas and Immigration (UKVI) processes are too slow and the length of the recruitment process (28%).
- Meeting UKVI requirements for guaranteed hours (22%).
- Complexity of paperwork and concerns about consequences of errors (21%).

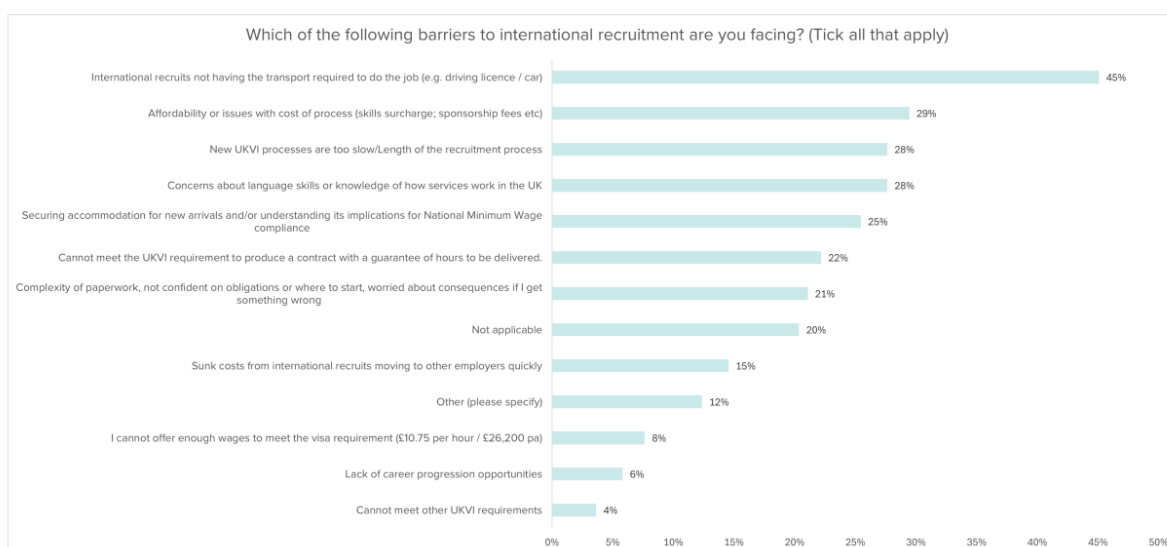


Figure 5: Barriers to international recruitment in homecare (source: Homecare Association Workforce Survey 2024.<sup>14</sup>)

## Genuine vacancies

Home Office guidance says:

*“You should provide evidence of the work you are currently delivering to demonstrate that your business has genuine vacancies related to your current request. These could be in the form of agreements with local authorities, the NHS or private contracts/agreements to provide care.*

*You should provide details of the contracts specific to the CoS application, for example:*

- The start and end date of the contract
- The nature of the services provided
- The number of service users covered
- The number of staff required to service the contract

<sup>14</sup> <https://www.homecareassociation.org.uk/resource/workforce-survey-2024.html>



- The locations where staff will undertake the work”

Few public bodies or self-funders can or will guarantee the number of hours of homecare they will buy.

On top of this, providers cannot accept new clients unless they have care workers available. When people need homecare, they need it now, and cannot wait three months for a provider to recruit. It is therefore normal practice to recruit in anticipation of demand.

Providers often cannot provide evidence of the exact number of service users and required care workers for contracts. Most contracts specify services to be delivered rather than hours or people. Both parties do not always sign all contracts, complicating compliance with evidence requirements.

Here is an extract from Home Office correspondence to a homecare provider:

*"Thank you for your request for additional certificates of sponsorship (CoS) in Skilled Worker.*

*We have not granted your request of 20 additional CoS in Skilled Worker. This is because the information you have provided does not guarantee any volume of work and does not evidence a deficit of carers. Your explanation that care providers are selected based on their ability to deliver a range of services rather than specific hours, while understandable, does not satisfy the genuine vacancy requirement for sponsorship."*

Providers must apply to the Home Office well in advance because it often takes 10-12 weeks to receive any response. Failure to apply in advance risks expiry of existing employees' visas. Not complying with Home Office regulations or sponsor conditions could lead to providers losing their licence.

If a provider delays applications and sponsored workers have expired visas, they must apply for new visas after the Home Office grants UCoS (Undefined Certificates of Sponsorship). This can be challenging and sometimes the Home Office rejects applications if the existing visa has expired.

In another example, a provider told us the Home Office rejected a visa renewal application because they had sponsored workers in the roles. The Home office said this meant they did not have genuine vacancies.

The current approach to the genuine vacancy requirement doesn't match the realities of the way the homecare sector operates.



# Homecare Association

## *CQC registered vs unregistered providers*

Only CQC-registered providers can now apply for sponsorship licences and visas. This means that employment agencies and unregistered micro-providers cannot employ sponsored workers.

We welcome the limitation of visas to CQC regulated organisations. In CQC-registered organisations, there is some oversight of safer recruitment, care worker well-being, and care quality.

## *Sponsored workers and dependants*

In our survey, 36% of respondents said the inability of sponsored workers to bring dependants had affected their ability to recruit. Comments included:

*“Many workers bring their families to better their lives. Not allowing dependants is not only cruel but a complete injustice to those who want to come and support those who need care.”*

*“A care role is incredibly emotionally draining - expecting people to work in these roles full time without their own support networks is inhumane.”*

*“Wellbeing is very important for every human being. Being an employer I have learnt that family life impacts heavily on productivity. The Home Office must consider that some of the family members that come bring with them a wealth of skills which our country can benefit from. You cannot have a worker without a family and expect them to be well enough to perform to your expectation.”*

The new rules on dependants single out careworkers from all other professions. The government treats them as second-class citizens, reinforcing the low-status of care work. This exacerbates recruitment issues whilst not addressing systemic issues in the sector.

The restriction on careworkers bringing their dependants makes it more difficult to find new workers for the UK.

## *Impact on different applicants and sectors*

This situation is extremely stressful for both sponsored workers and care providers.

Worried sponsored workers inundate providers' compliance teams with calls.

Some sponsored workers have considered drastic measures, fearing arrest or deportation. Many sponsored workers sacrificed everything to come and work in the UK. Many cannot return until they have paid off their debts. Some international recruits feel intense shame if their jobs do not work out. In certain nations, authorities imprison individuals in debt.



The new rules have affected the ability of providers to employ enough care workers to meet demand. This, too, is very stressful.

Most care providers feel a strong sense of responsibility for the people they support. Unmet need creates a high level of risk and adds to pressure on councils, who have a statutory duty for safeguarding.

Inability of a provider to meet their contractual obligations for care delivery also risks loss of income and financial viability.

## 5. The Home Office's operation of the skilled worker visa system

*Do you have any views on the application process? (e.g. ease of use / timeliness / customer service / fees)*

- *For sponsors*
- *For applicants applying from out of country*
- *For applicants applying to extend*

*Do you have any views on the Home Office's communication with sponsors and applicants. For example:*

- *How readily available is information and is this information useful?*
- *How easy is the system to navigate?*
- *What support is available for anyone who struggles?*
- *How well are changes to the rules or process communicated?*
- *Have rule changes increased the costs or burdens on applicants or sponsors?*

*Do you have any views on the Home Office's response to appeals / correspondence / complaints (for sponsors and applicants)?*

*Are you able to feed back to the Home Office or any other government department about your concerns or needs?*

### Application process

#### *Cost and complexity*

In our Workforce Survey 2024, providers told us that the costs associated with international recruitment can be significant<sup>15</sup>. These include expenses related to advertising, recruitment agencies, visa applications, and relocation expenses. This financial burden can place further strain on an already under-funded social care

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<sup>15</sup> [Homecare-Association-Workforce-Survey-2024 \(12\).pdf](#)

sector. Some providers cited the cost of sponsorship as a barrier, noting that fees are prohibitive.

Changes to the immigration rules also saw an increase in the salary threshold for sponsored workers. As mentioned above, this is now £23,200 per annum (previously £20,960 per annum) for a 37.5 hour week and £11.90 per hour for extra hours.

We asked providers about the maximum salary threshold they could sustain, if it were to be changed. Around a third (32%) suggested a mark around the current level of between £23,000 and £23,999, which was the most popular response. However, 18% thought the existing level was already too high and suggested a figure lower than £23,200 (for example, based on the National Minimum Wage). On the opposite end of the scale, 8% concluded that a threshold of £30,000 or more was sustainable.

Most providers find the application process for sponsorship licences complex at first.

The process of applying for a sponsorship licence and recruiting often takes at least nine months for first-time applicants. Recent rule changes have further complicated the process. Tighter interpretation of the rules and higher evidence requirements add to the burden for providers.

Many have to employ lawyers to help, which adds to the cost. Providers seem to find subsequent applications easier. Skills for Care has produced useful guidance for employers in the care sector<sup>16</sup>.

Overseas care workers who want to work in the UK find the application process very difficult and daunting. Too often, they become the victims of exploitation by unscrupulous organisations charging high fees unlawfully<sup>17</sup>.

### *Inconsistencies within the Home Office*

Care providers often feel frustrated with the visa application process. This is because they have to deal with multiple teams and repeat information. There are also notable inconsistencies between different teams within the Home Office.

### *Questions about operation of the priority system*

The Home Office operates a pre-licence priority service. Organisations can pay an extra fee when they apply online to prioritise their application for a sponsor licence.

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<sup>16</sup> <https://www.skillsforcare.org.uk/Recruitment-support/International-recruitment/International-recruitment.aspx>

<sup>17</sup> <https://www.context.news/socioeconomic-inclusion/long-read/soaring-abuse-in-uk-care-jobs-shatters-migrants-dreams>

With this service, the Home Office will process applications within ten working days, but does not guarantee approval.

Some providers have received letters from the Home Office saying:

*“The purpose of this letter is to inform you that your application has been excluded from the Pre-Licence Priority service and 8-week service standard. This is because your application raises exceptionally complex issues. Therefore, we require more time to investigate your case thoroughly in order to reach a correct decision”.*

They do this after processing identical priority applications for the same organisation, when there is nothing exceptionally complex (Appendix 1).

Providers have questioned whether this is a standard response when they get to 24 hours before the priority service deadline is about to expire.

### *Delays in processing*

There are substantial delays in the Home Office processing requests for new licences, renewals, and Undefined Certificates of Sponsorship (UCoS). Some providers wait for months rather than weeks (Figure 6). These delays affect the quality and continuity of care services provided.

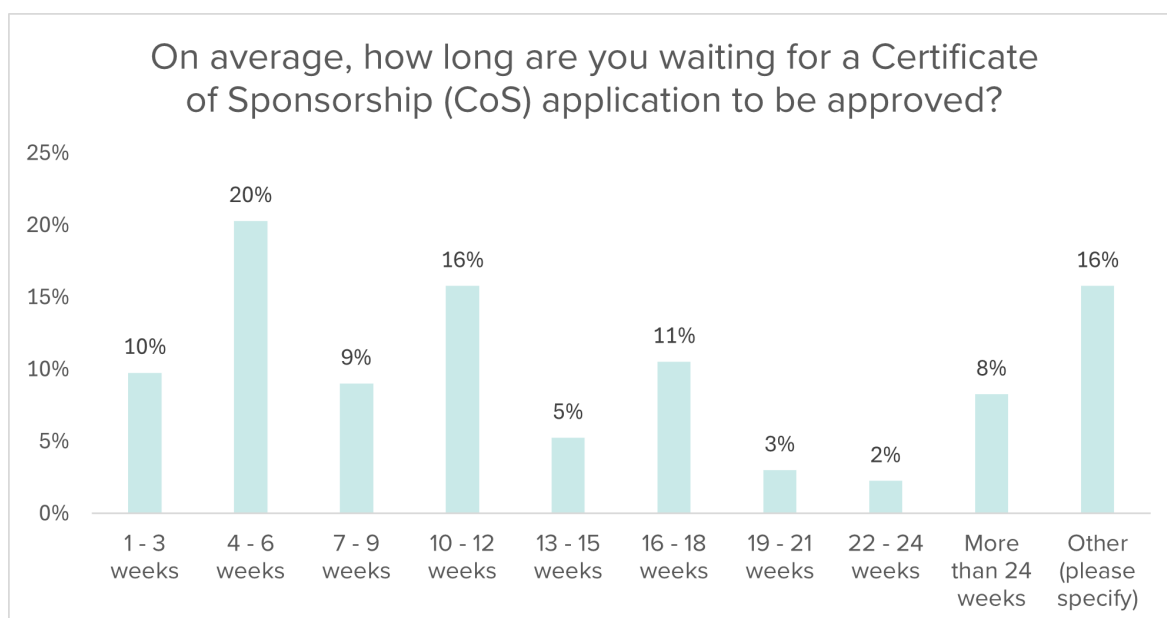


Figure 6: Waiting time in weeks for homecare providers to obtain certificates of sponsorship from the Home Office (source: Homecare Association Workforce Survey, June 2024<sup>18</sup>).

<sup>18</sup> <https://www.homecareassociation.org.uk/resource/workforce-survey-2024.html>



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## *Revocation of licences*

We have seen one letter sent by the Home Office to a provider informing them they were revoking their licence. The communication was clear and detailed. The Home Office had followed due process, giving the provider enough time to respond.

We are aware of successful appeals against revocation, suggesting the Home Office will reconsider in the light of evidence.

Sometimes, authorities investigate reports of abuse against sponsored workers. The workers then deny any issues. The Home Office's arm's length approach to inspections may not be effective. Migrant workers are unlikely to disclose abuses because of fear or pressure. Inspectors must gather objective evidence, such as payslips, or visit accommodation.

## Home Office communications

The Home Office's communication with sponsors, applicants and sector experts has been inadequate.

Home Office officials lacked understanding of the care sector, leading to mistakes in granting licences at the outset<sup>19</sup>. This created unnecessary risk and hardship for sponsored workers and providers.

Insufficient knowledge of the sector contributed to an influx of unscrupulous operators. In extreme cases, companies entered the market with no intention of delivering genuine care services. These operators have abused the system, harming both workers and vulnerable individuals in need of care.

The Home Office could have avoided many problems if officials had engaged earlier with sector experts and acted on their advice. Officials continue not to respond to feedback from sector leaders.

Our Workforce Survey showed providers experienced frustration with Home Office communications during CoS applications. Providers reported receiving little or no communication from the Home Office on the source of delays or next steps. This caused them to lose prospective candidates. With ongoing recruitment and retention issues, the sector cannot afford to lose workers.

*"We applied for more Certificate of Sponsorship (CoS) in early October 2023 last year and we are still waiting for the response. My*

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<sup>19</sup> <https://www.gov.uk/government/publications/an-inspection-of-the-immigration-system-as-it-relates-to-the-social-care-sector-august-2023-to-november-2023>



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*worry is that I hope I don't lose the candidates that I selected to recruit.”*

*“The average time is 7-9 weeks but they are not being approved. I have [been] applying since September 2023 to no avail.”*

Thanks to help from colleagues in the Department of Health and Social Care (DHSC), some aspects of communication with the Home Office have improved.

Providers have, for example, valued free webinars on international recruitment by DHSC and the Home Office.

The Homecare Association called for more effective information sharing between authorities; these include the Home Office/UKVI; HMRC; CQC; local authorities; and the wider sector.

Councils, for example, did not know which providers in their areas had hired sponsored workers or how many. Councils learnt about revoked licences after the Home Office had communicated with affected providers, giving them no time to act.

Data sharing between UKVI and councils is now improving.

## 6. Enforcement activities

*Do you have any views on the effectiveness of Home Office's approach to tackling non-compliance and labour market abuses? For example:*

- *Does the Home Office make it clear how to report any concerns or problems*
- *How effective are the processes to stop exploitation and support vulnerable people?*
- *Do you feel there is a co-ordinated cross-government response? Are responsibilities clear?*

### Reporting of concerns

Official routes for reporting concerns about immigration and labour market abuses are easy to find from online searches<sup>20</sup>.

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<https://www.imsallegations.homeoffice.gov.uk/start#:~:text=You%20can%20call%20in%20confidence,h otline%20on%200800%20595%20000>





Charities, such as Right to Remain,<sup>21</sup> Justice and Care<sup>22</sup>, and Unseen UK<sup>23</sup> also offer help for migrant workers.

The Home Office's approach to addressing non-compliance and labour market abuses is, however, inadequate.

Home Office officials have not always acted on sector-specific advice and seem to have inadequate resource to do so. The Home Office should view non-compliance as a crime and conduct more thorough inspections to discourage poor practices. Criminals can exploit the system by using the right SOC codes for their migrant workers, making them seem legitimate to authorities.

Lack of effective commissioning, contracting and regulation of homecare has exacerbated the problems.

In some places, international recruits in care are not receiving enough hours to meet the full-time requirement. This breach of licence conditions has led to substantial hardship for some sponsored workers.

Some breaches have happened because councils have contracted with too many providers; this results in insufficient hours for each provider to offer full-time employment for workers.

When councils contract with too many homecare providers, it also risks market instability. Each provider receives insufficient work to operate in an efficient or viable way.

Many councils and NHS purchasers of homecare prioritise price over quality, promoting undercutting. Some providers invoice for services not fully delivered, attracting staff willing to take part in such schemes. Councils struggle to enforce standards because of limited resources. The CQC has a large backlog of inspections, with 60% of homecare providers with no ratings or out-of-date ratings. Regulatory bodies often receive positive feedback from complicit staff, masking substandard care.

HMRC lacks resources to enforce the National Minimum Wage (NMW). This creates an environment where non-compliant providers thrive.

Migrant workers are important because of skill shortages. Introducing them too quickly without due care has, though, led to labour abuse and market instability. New companies hire too many workers and pay them too little, hoping to gain market share

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<sup>21</sup> <https://righttoremain.org.uk/toolkit/>

<sup>22</sup> <https://justiceandcare.org/>

<sup>23</sup> <https://www.unseenuk.org/>



through risky price-cutting strategies. Established, ethical providers then struggle to compete.

Migrant workers often endure exploitative practices, hoping to secure indefinite leave to remain. The Home Office's inspection approach relies on worker feedback, which is compromised by fear. We have serious concerns about the exploitation of sponsored workers by unethical operators.

Regulators and enforcers, including the CQC, HMRC, UKVI, and the police, appear unable to monitor and enforce regulations and the law effectively.

We call for regulators and enforcers to have enough resources to deal swiftly and robustly with unsafe, poor quality care, non-compliance, or illegal practices.

#### Prevention of exploitation

The processes to prevent exploitation and help sponsored workers need to be improved. There are ongoing issues such as excessive recruitment fees, debt bondage, insufficient work and pay, and poor living conditions for migrant care workers<sup>24</sup>.

Migrant workers are often unaware of their rights and where to seek help. The Home Office could provide them with more information as part of the visa application process.

The UK government should work with other countries to provide accurate information to candidates and root out criminals.

A worker's immigration status is tied to a single employer in the current system, leaving them open to exploitation.

A nationally coordinated process to redeploy sponsored workers efficiently and sensitively if their sponsor loses their licence or cannot offer sufficient hours would be helpful.

Changing how public bodies fund and purchase homecare would reduce the risk of labour abuse for both domestic and migrant workers.

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<sup>24</sup> [Modern slavery gangmasters exploit care worker shortage - BBC News](#)



## Cross-government coordination

To date, there is a lack of coordinated cross-government response to address these issues.

We urge the Home Office, HMRC, CQC, local authorities, and providers to work together and share data and intelligence to keep the workforce safe.

## 7. The future of the system

*How could the work visa system be improved? Any areas the Home Office should focus on in the future?*

### Recommendations

We suggest several improvements and focus areas for the future of the Skilled Work Visa system:

#### **1. Develop a data and intelligence driven approach**

- Implement a coordinated system for managing supply and demand of sponsored care workers.
- Improve sharing of information between agencies.
- Involve sector experts to better understand the challenges of the care industry.

#### **2. Increase flexibility**

- Reconsider the rule prohibiting care workers from bringing dependants to avoid deterring potential applicants.
- Adapt the sponsorship system to align with care sector realities, such as recruiting ahead of need.
- Work with local authorities to align homecare commissioning practices with visa system requirements.

#### **3. Establish clear employment guidance**

- Clarify and enforce rules on issues such as payment structures, rest periods, and reasonable expenses for migrant workers.
- Safeguard and assist sponsored workers by informing them about their rights and helping them find new jobs if needed.
- Allow migrant workers to access apprenticeships and develop their careers without unnecessary bureaucracy.



# Homecare Association

## **4. Streamline processes**

- Simplify the application process for sponsors and applicants to reduce complexity, cost, and time.

## **5. Strengthen enforcement**

- Improve capacity and coordination of regulators to tackle non-compliance and labour market abuses.

## **6. Implement reporting channels**

- Develop simple reporting systems for migrant workers to prevent abuse and address power imbalances.

## **7. Enhance compliance checks**

- Implement more frequent desktop-based inspections, reviewing raw data such as payslips, work hours, and contract details to monitor compliance more comprehensively and efficiently.

## **8. Increase transparency**

- Share anonymised rationales for licence suspensions or revocations across the market to promote learning and best practices.

## **9. Regular monitoring**

- Evaluate routinely the visa system's impact on the care sector, with a willingness to make timely adjustments as needed.

## **10. Focus on domestic workforce**

- Implement the workforce strategy to grow and upskill the domestic care workforce.

These recommendations aim to improve the system by addressing workforce shortages; protecting workers; and maintaining high standards of care.