HM Government

United Kingdom Labour Market Enforcement Strategy 2023/24 – Annex B:

Labour Market and Non-compliance Risk Analysis

Director of Labour Market Enforcement

Margaret Beels

October 2023

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Contents

Introduction

This Annex provides supplementary information and analysis supporting the 2023/24 Labour Market Enforcement Strategy and covers four main areas:

1. Emerging economic and labour market issues that may impact on labour non-compliance in the future.
2. Analysis of proxy measures to assess the scale and nature of labour market non-compliance within the Director's remit.
3. An update on a major research study commissioned by the Director seeking to improve the evidence base around the scale and nature of non-compliance.
4. A detailed description of the work on the ODLME risk model to present an updated picture of risk.

Section 1: Economic and Labour Market Outlook

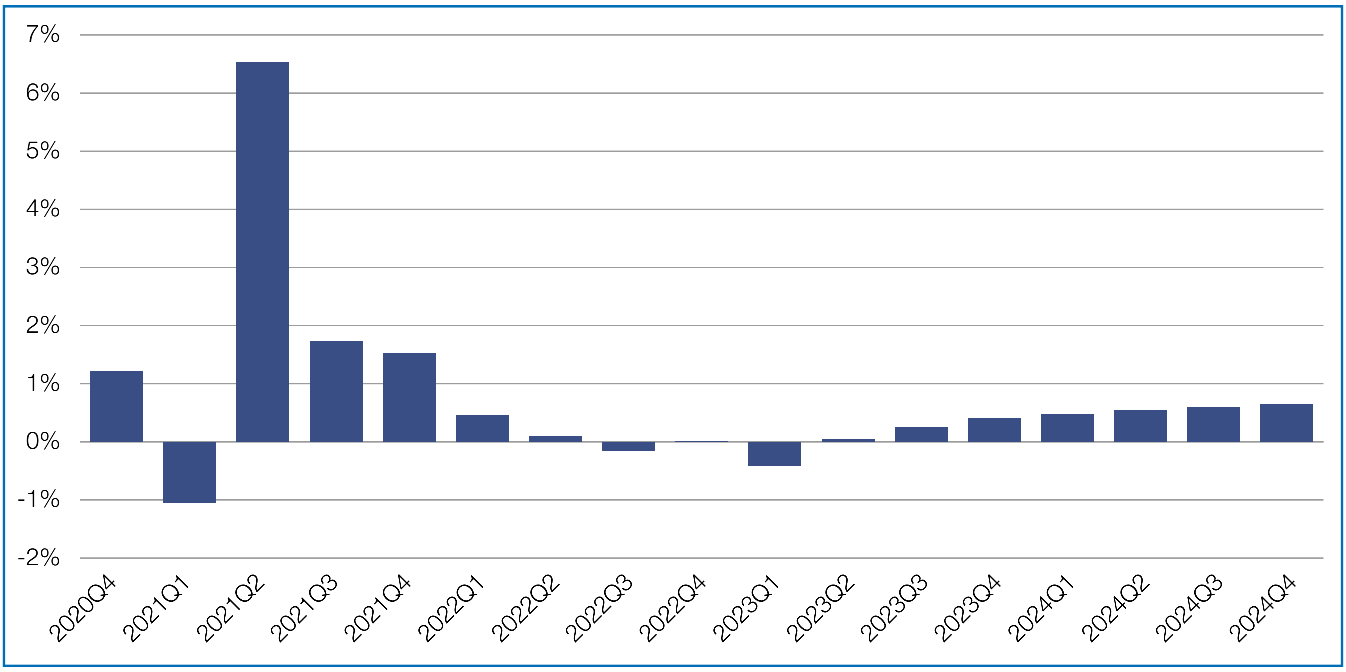
1.1 Economic performance and forecasts

1.1.1 Overall economic performance

Latest data and forecasts from the Office for Budget Responsibility suggest the UK economy will contract slightly (by 0.2 per cent) in 2023, though avoiding a technical recession, reflecting a softer economic landing than had been forecast by many in late 2022 and early 2023 (Office for Budget Responsibility 2023).

Growth slowed markedly during 2022 and is forecast to decline by 0.4 per cent in Q1 2023, before rising again over the remainder of 2023 (Figure 1.1). Annual growth is forecast to reach 1.8 per cent in 2024 and then 2.5 per cent in 2025.

Figure 1.1: Quarterly growth in UK GDP, 2020Q4 – 2024Q4

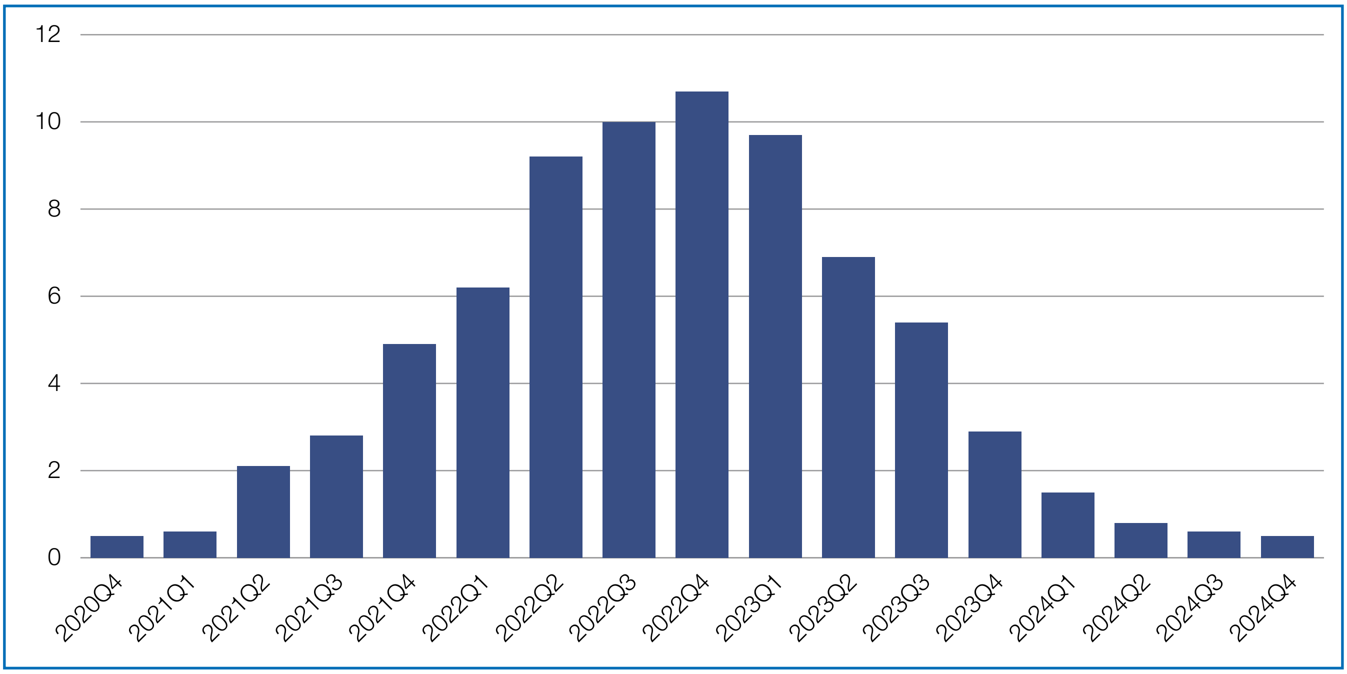


Source: Office for Budget Responsibility (2023)

A key challenge over the past year has been an acceleration in the rate of inflation, peaking at over ten per cent in late 2022/early 2023, though this was higher for food prices (Office for National Statistics 2023a).

The effect of this has been a cost-of-living squeeze, a fall in real wages resulting in higher pay demands and increased industrial unrest. The OBR, however, forecasts that the annual rate of inflation will fall throughout 2023, such that heading into 2024 it will be well below two per cent.

Figure 1.2: Annual CPI Inflation by Quarter (%), 2020Q4 – 2024Q4



Source: Office for Budget Responsibility (2023)

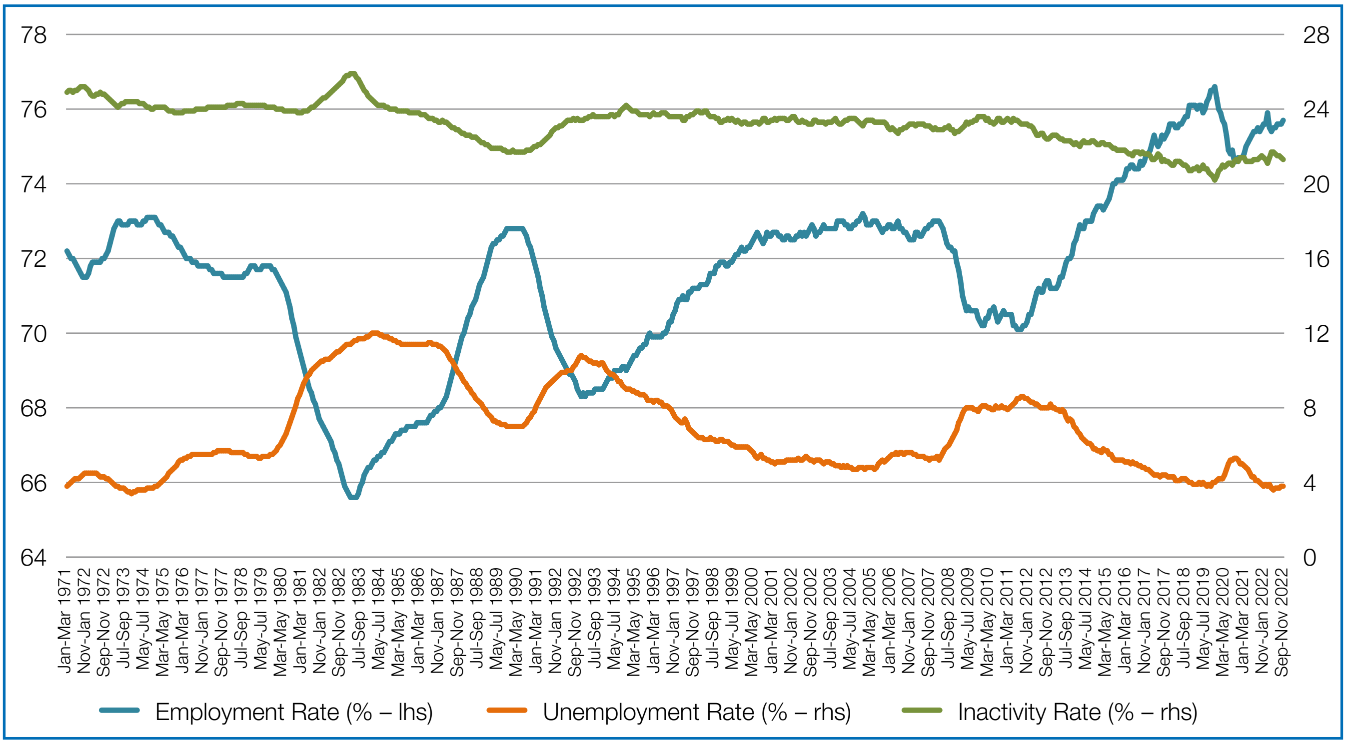
1.2 Recent labour market trends

1.2.1 Recent trends

- Despite the slowdown in economic activity in recent months the labour market has remained relatively robust, though more recent data suggest some weakening with a consequent rise in unemployment. Employment remains a quarter of a million below pre-pandemic levels (32.84 million in Nov-Jan 2023 compared with 33.07 million in the period Dec-Feb 2020).
- By contrast the number of workforce jobs, at 36.42 million in December 2022, is 0.75 million higher than the same period three years ago[1].
- Unemployment (at 3.7 per cent in March 2023) remains lower than pre-pandemic, though has risen from 3.5 per cent in summer 2022. The OBR forecasts unemployment to rise to 4.1 per cent in 2023 and then to 4.4 per cent in 2024, before starting to fall again.
- Economic inactivity among the working-age population (16-64) rose by 640,000 to 9.01 million in mid-2022 following the pandemic, due to more people in full-time study, those taking early retirement and long-term ill-health. By early 2023 inactivity had started to fall again (by 153,000).

1 The number of people with jobs is not the same as the number of jobs. This is because a person can have more than one job. See Office for National Statistics (2020)

Figure 1.3: Employment, unemployment and economic inactivity rates (16-64) – UK, Jan-Mar 1971 to Nov-Jan 2023



Source: Office for National Statistics (2023c) Table, a02samar2023.xls

(i) Migrant labour – overall changes

Between 2019 and 2022 total employment among UK nationals fell by 373,000. This was mostly offset by an increase in employment among non-UK nationals. However, following Brexit and the changes to the UK's immigration system, there has been a shift away from EU towards non-EU employment (Table 1.1). Over this period employment of EU nationals fell by over 150,000 to just under 2.2 million. By contrast non-EU employment increased by 468,000 to around 1.8 million.

Table 1.1: Employment levels by nationality, 2019-2022 (000s)

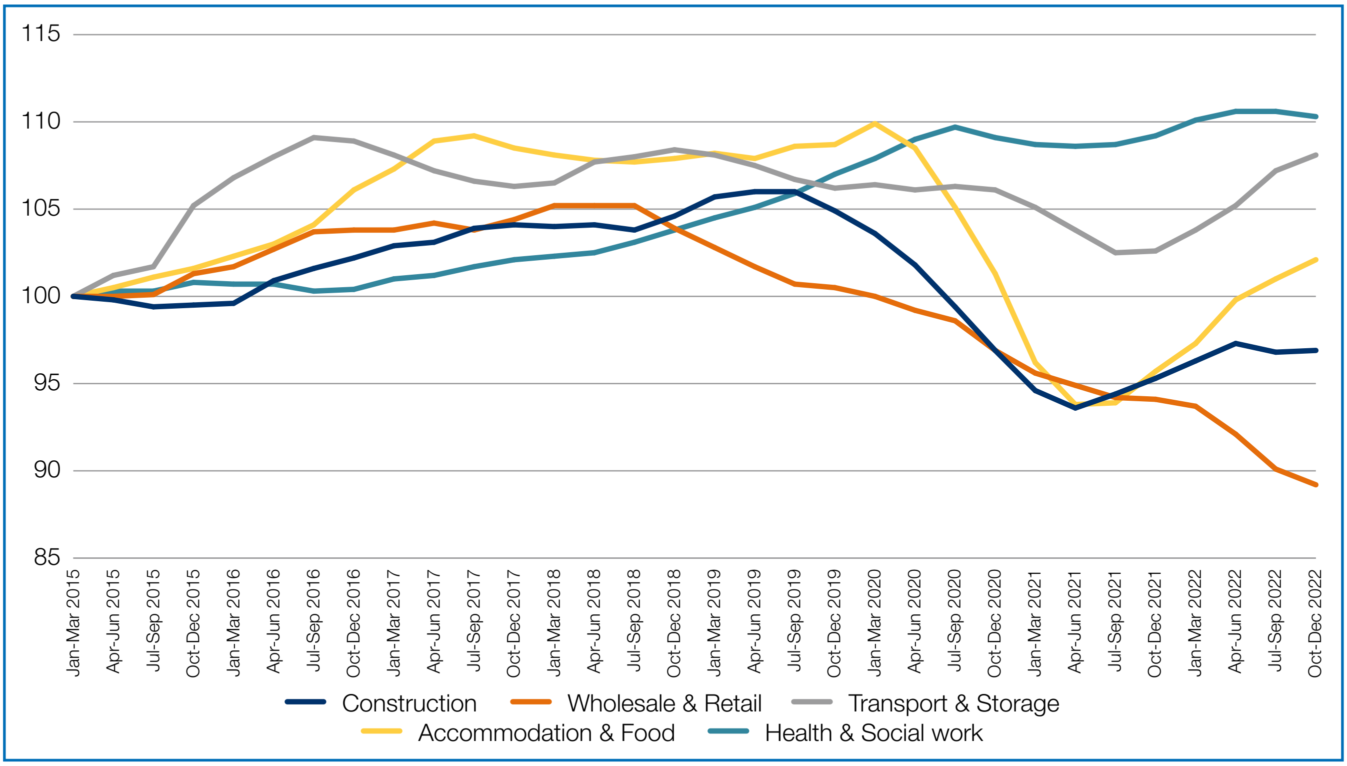
	Total	UK	Total Non-UK	Total EU	Total Non-EU
2019	32,795	29,140	3,650	2,324	1,326
2022	32,743	28,767	3,966	2,172	1,794
Change 2019-2022	-51	-373	316	-152	468

Source: Office for National Statistics (2023b) Table EMP06, annualised using 4-quarter averages

(ii) Employment by sector

Employment also remains lower now compared to pre-pandemic in many sectors, but particularly in *wholesale and retail* (though this has been a continuous decline since 2018) (Figure 1.4). Employment also fell sharply in *construction* and the *accommodation and food* sectors during the COVID-19 pandemic but has since recovered some of the losses. Employment in *health and social care* has been mostly rising over the period (suffering a much smaller decline during the COVID-19 pandemic), while in *transport and storage* employment is now almost back to pre-pandemic levels.

Figure 1.4: Employment trends by selected sector, UK, Jan-Mar 2015 to Oct-Dec 2022



Source: Office for National Statistics (2023b) Table Emp13feb23.xls – 4-quarter average index Jan-Mar 2015 = 100

(iii) Migrant labour – changes by sector

But as Portes and Springford (2023) highlight changes in migration have had a differential impact by sector. The end of free movement for EU nationals and the shift away from low-skilled work immigration routes into the UK, have meant that sectors such as *accommodation and food*, *transport and storage* (incl. *warehousing*), *construction*, and *wholesale and retail* have experienced a decline in migrant labour from both the EU and non-EU, in some cases of up to 6 to 8 per cent (Table 1.2 below).

Table 1.2: EU and non-EU change in employment, UK, 2020-22

	Out-turn Q2 2022 Number of workers	Counterfactual Q2 2020 Number of workers	Gain/loss of workers under new system	Gain/loss as % of total employment in sector
Sector				
Health and social work				
EU	276,000	278,000	-1,700	-0.04%
Non-EU	711,000	637,000	74,000	1.65%
Education				
EU	237,000	195,000	42,000	1.20%
Non-EU	357,000	299,000	58,000	1.68%
Public administration				
EU	100,000	106,000	-5,800	-0.23%
Non-EU	188,000	163,000	25,000	0.99%
Administrative and support				
EU	121,000	153,000	-32,000	-2.26%
Non-EU	182,000	204,000	-22,000	-1.56%
Finance and insurance				
EU	103,000	114,000	-12,000	-0.84%
Non-EU	184,000	189,000	-5,500	-0.39%
Information and communication				
EU	150,000	159,000	-9,000	-0.55%
Non-EU	291,000	271,000	20,000	1.22%
Accommodation and food				
EU	177,000	244,000	-67,000	-4.08%
Non-EU	251,000	282,000	-31,000	-1.86%
Transportation and storage				
EU	137,000	265,000	-128,000	-8.45%
Non-EU	253,000	256,000	-3,100	-0.20%
Construction				
EU	164,000	210,000	-46,000	-2.17%
Non-EU	132,000	139,000	-6,600	-0.31%
Manufacturing				
EU	277,000	324,000	-47,000	-1.73%
Non-EU	234,000	242,000	-7,900	-0.29%
Wholesale retail repair of motor vehicles				
EU	263,000	366,000	-103,000	-2.79%
Non-EU	360,000	377,000	-17,000	-0.46%
Professional scientific technical				
EU	193,000	241,000	-48,000	-1.79%
Non-EU	344,000	321,000	23,000	0.85%

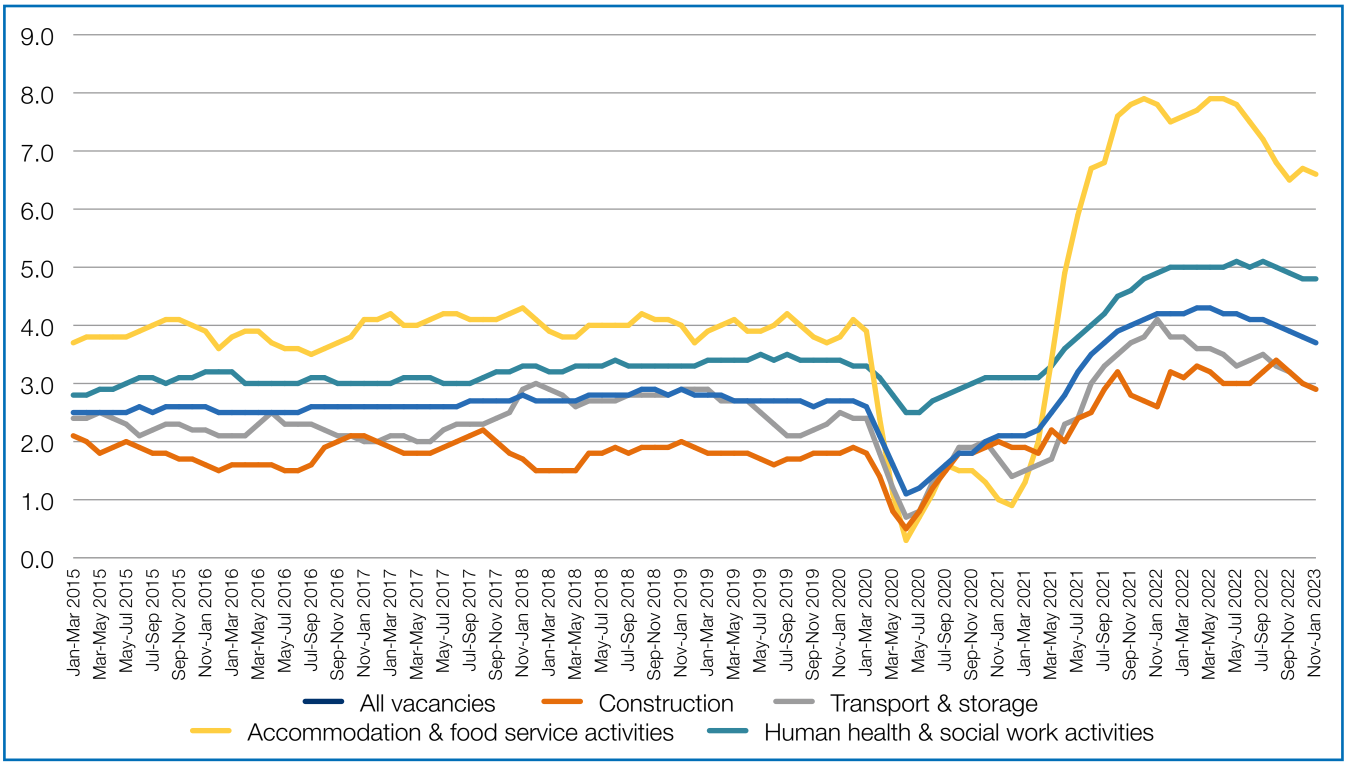
Source: Portes and Springford (2023)

(iv) Overall vacancies by sector

Across the wider economy labour shortages have manifested themselves in a marked increase in vacancies, which reached 1.3 million in May-July 2022, but have since fallen back to 1.1 million. Pre-pandemic total vacancies stood at around 0.8 million.

Again, the impact across sectors has been different. Whereas overall there were 4.3 vacancies per 100 employee jobs in spring 2022, in *accommodation and food* this was 7.9 and in *health and social work* around 5. Vacancy ratios in other sectors assessed by ODLME to be at higher risk of labour exploitation were below average at around 3.5 or less. More recently vacancy ratios have fallen across all these sectors, though remain well above average in *accommodation and food* (6.5) and *healthcare* (4.8) (Figure 1.5).

Figure 1.5: Vacancies per 100 employee jobs, UK, Jan-Mar 2015 to Nov-Jan 2023



Source: Office for National Statistics (2023c) Table vacs02fmar2023.xls

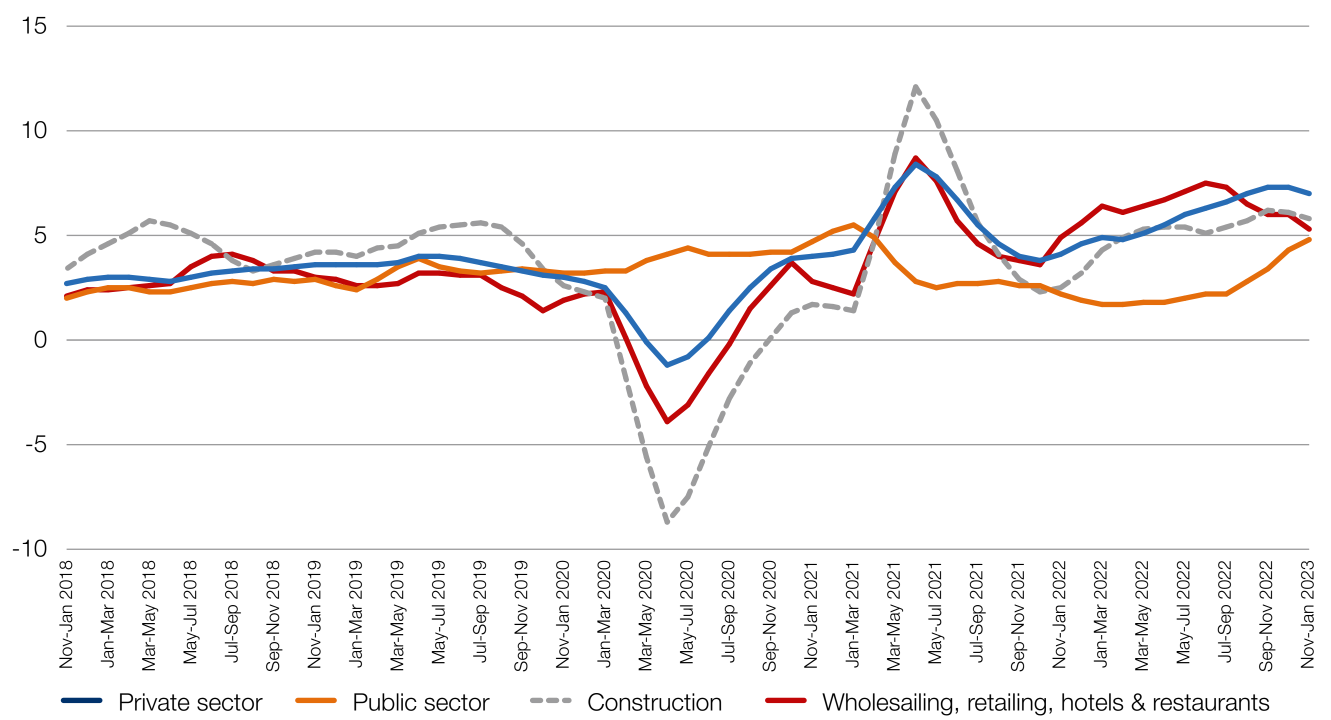
(v) Pay

A consequence of the growing gap between labour demand and supply has generally been faster pay rises in those sectors experiencing relatively high vacancies.

From early 2018 up to the onset of the pandemic in March 2020, pay growth was broadly similar at around 3-3.5 per cent in the public and private sectors. But since the pandemic there has been divergence with private sector pay growth clearly outstripping public sector pay. While public sector pay has been more stable overall since early 2018, beginning to rise only in the latter half of 2022 (reaching 4.8 per cent in early 2023), private sector pay growth has been far more volatile reflecting the state of the economy during the pandemic. Since autumn 2021 private sector pay has been rising, mostly due to labour shortages, peaking at over seven per cent in late 2022.

By spring 2020 both *construction* and the *wholesale and retail,* and *hotels and restaurants* sectors were experiencing negative pay growth of up to eight and 4 per cent respectively. With an easing of lockdown, pay in both sectors rebounded by over 12 and eight per cent respectively by mid-2021, before falling again with the further lockdown in late 2021. Pay in the *wholesale and retail*, and *hotels and restaurants* sectors then climbed again reaching 7.5 per cent in summer 2022, but along with the fall in vacancy rates discussed above this has fallen back to 5.3 per cent by early 2023.

Figure 1.6: Average weekly earnings annual growth rates (%) for regular pay by sector in Great Britain, seasonally adjusted, November 2017 to January 2023 to November 2022 to January 2023



Source: Office for National Statistics (2023c) Table EARN01

(vi) Precarious working

The pay growth discussed above also needs to be understood in the context of higher inflation. Overall, year-on-year pay growth is currently about six per cent, but because inflation is rising at an even faster rate, real pay is falling and is now negative. Furthermore, real pay has been falling for over a year now, all of which adds to cost-of-living pressures, which may impact on workers choosing additional or more precarious work. So far, though, evidence suggests this is not happening:

- At 1.22 million the number of people with second jobs is currently at its highest level since the mid-1990s, though this is only 10,000 (0.8 per cent) higher than the pre-pandemic level.
- There is little evidence so far of sustained growth in zero hours contract (ZHC) working over the past two years. In the year to October-December 2022 there were an average of 1.06 million people on ZHCs, which compares to an average of 1 million two years ago. Latest ONS data do however indicate 3.4 per cent of all those in employment on ZHCs, the highest proportion recorded (previously 3.3 per cent in April-June 2020), though these data should be treated with caution as they are not seasonally adjusted. Whether this marks an upward trend in ZHC working remains to be seen.
- The share of all employees working on temporary contracts has remained stable at around six per cent since early 2021. Furthermore, the proportion who were working in temporary roles because they could not find permanent jobs has fallen from around a third in spring 2021 to just over a fifth in October to December 2022.

- Part-time working remains below pre-pandemic levels with only around 10 per cent doing so because they could not find a full-time job (down from 13.6 per cent in winter 2021/22).

All of the above most likely reflects a labour market that is still relatively strong. However, we might expect movement in some of these indicators as the economy slows and unemployment starts to creep up.

1.2.2 Labour market outlook

At the time of writing the sustained decline in real pay has led to concerted industrial action. Between November 2022 and January 2023 over 1.5 million working days were lost in 800 disputes involving over 470,000 workers (Office for National Statistics 2023c). As noted above, economic forecasts project a fall in inflation throughout 2023 and cost-of-living pressures should begin to ease as a result.

Just as recent economic forecasts are projecting a contraction for the UK in 2023, so too is the expectation that the labour market will deteriorate. The OBR has forecast that unemployment will continue its upward path reaching 4.4 per cent in 2024. Thereafter, even though this is projected to fall, it will still be above 4.1 per cent by early 2028.

1.3 Concluding comments

After a period of strong economic growth and a robust labour market following the COVID-19 pandemic, the signs are that both will slow over the coming year. Unemployment is likely to rise, though only moderately, meaning that easing of labour shortages in some sectors may only be marginal. Real pay will continue to be a key factor for workers, along with ongoing industrial action, over the coming months, but longer term this should ease as inflation is forecast to fall to below three per cent by Q4 2023.

Section 2: Risk Model

2.1 Background to the risk model

Although no one best approach exists to assessing non-compliance in the labour market, ODLME follows a primarily sectoral approach. This recognises, and helps to differentiate between, the underlying structures and various business models that operate across sectors. It also reflects the approach used by the three enforcement bodies for measuring and comparing complaints, intelligence and data[2].

The ODLME risk model is based on the Measurement of Risk in Law Enforcement (MoRiLE) methodology which has been adapted to measure the risk of labour non-compliance for the worker. This is because some of the original scoring across different crime types such as for physical and financial harm, does not provide sufficient granularity to compare different industry sectors when assessing labour non-compliance.

While a number of criteria are considered in our risk assessment, the overall level is determined by the types of behaviour which occur over a five-point spectrum ranging from error to modern slavery, as follows:

- A (includes a proportion of Modern Slavery),
- B (Deliberate Non-compliance),
- C (Serious Non-compliance),
- D (Interpretation, non-compliance)
- E (Error)

The number of compliance and enforcement interventions is also taken into consideration, though this presents a challenge for weighting between the different bodies.

The enforcement bodies have quite different underlying processes and responsibilities (such as licensing) making direct comparison of their risk assessments difficult. They also have different levels of resources available to them which impacts on their ability to intervene and on the type and volume of interventions they undertake.

ODLME continues to look to enhance the risk model and improve our measurement of the scale and nature of non-compliance.

2 For EAS the sector of employment of the worker is not always known as EAS may not have sight of the end user (and sector) to which an employment business is supplying workers.

2.2 Contextual factors for risk in 2023/24

2.2.1 COVID-19 pandemic

The risk model used information for the financial year 2021/22, while recognising that there were still lockdowns and restrictions on the operations on some industries for some of the period. Schemes such as the furlough scheme continued to support some workers who were unable to work during this time.

However, while COVID-19 is a continuing health issue, the economy has fully re-opened meaning that any long-term impacts on non-compliance are limited as business operations and enforcement bodies processes have returned to business as usual.

2.2.2 EU workers post-Brexit

There remains uncertainty around the scale of EU migration through the EU Settlement Scheme as applications are ongoing. Since the official closure of the Settlement Scheme at the end of June 2021, there have been over 300,000 further applications. The High Court has determined that those with pre-settled status do not lose their residency rights or permanent status if they fail to gain full settled status (Lewis Silkin 2023).

It remains a gap in our knowledge as to how many workers in the UK remain outside of the scheme.

Table 2.1: EU Settlement Scheme: applications and outcomes, September 2021 and September 2022

	Sep 2021	Sep 2022	Change
Applicants	6,223,350	6,874,700	10.4%
Concluded	5,823,080	6,686,530	14.8%
Settled Status	3,027,230	3,359,250	10.9%
Pre-Settled Status	2,441,000	2,677,190	9.6%
Refused	165,550	375,400	126.8%

Source: Home Office (2022a)

Other factors our risk modelling has taken into account include:

- **The poor economic environment:** high inflation environment coupled with supply chain issues in the food sector and continuing labour shortages will slow economic growth. With wage demand unlikely to keep up with inflation, risks will increase in the hidden economy to earn off-record wages. New legitimate work opportunities may be temporary with employees unlikely to be taken on permanently until the economy improves.
- **The NMW uplift from April 2023 will increase the number of workers at risk across different industries.** The scale of the increase will increase cost pressures on employers who will also be looking to cut costs, but also seek to reduce operating times to restrict labour (and other costs). Businesses paying NLW/NMW will have an even greater incentive to maximise worker productivity.

- **While employers in the NHS and care sectors already recruit from overseas, the global reach of UK employers in agriculture has continued to expand following the Ukraine conflict.** There have been cases of workers from countries such as Nepal paying fees in their home countries to access work in the UK. This may not be illegal in the home countries but increases the vulnerability of workers who have to pay debt back especially if the expected amount of work does not materialise. Pre-departure in-country payments make due diligence harder for sponsors, as well as for enforcement bodies to tackle the issue as the payments occur outside of the UK. The issue of overseas payments is also a factor in other sectors, including the NHS and care sectors where there is large recruitment of migrant labour.
- **While outside of the Director's remit, workers using employment tribunals to seek redress face increasing delays. The COVID-19 pandemic and resourcing issues have further delayed timescales for bringing cases to tribunal.** While this does not directly impact the risk model, this may create an underreporting of non-compliance when assessing the overall scale and nature of non-compliance. Workers may be hindered from accessing the tribunal system, due to the effort and barriers involved in having their voice heard. This may increase pressure on workers and employers to settle cases early and possibly for less than they might have won in a tribunal.

2.3 Risk Model – Key Findings

Table 2.2 below sets out those sectors/areas deemed to pose the highest risk of non-compliance within the Director's remit.

The key messages from this are as follows:

- GLAA reported a reduction in their assessment of the threat across the **manufacture of food** sectors, principally reducing the level of Deliberate Non-Compliance (category B) to Serious Non-Compliance (Category C).
- The outcomes from Operation Tacit, an extensive joint working operation into the Leicester garment industry in 2020/21 has reduced the assessment of the threat in SIC 13 & 14, **garment manufacturing**, with Serious Non-Compliance (Category B) the worst behaviour recorded. The outcomes of Op Tacit show that although non-compliance occurs in the Leicester garment manufacturing industry, it is not higher than in other manufacturing subsectors.
- The level of threat in the **care sector** (SIC 86/87) has increased following joint activity for Operation Topaz following initial GLAA cases in late 2021. The operation has continued to grow during 2022 involving other enforcement bodies and wider stakeholders.
- Additionally, HMRC NMW recognise that several sectors were impacted by the pandemic and businesses/workers supported by the Coronavirus Job Retention Scheme (CJRS) and other support schemes (for example **food services/hospitality** in 'Eat Out to Help Out') and while complaints and intelligence have fallen this does not change their long-term assessment of these sectors.

2.3.1 Assessed changes in impact score

While Table 2.2 provides an update on specific sectors, any description of non-compliance reflects outliers within those sectors rather than being indicative of the whole industry sector or spectrum of non-compliance. For a sector like agriculture, while the threat to seasonal workers is highlighted below, this represents one labour issue within the sector and there will be other issues that are overseen by the business-as-usual responsibility of GLAA as a licensed sector.

Although not assessed as a high-risk sector for Table 2.2, the **shellfish gathering** sector (SIC code 03110) has historically been of high importance to GLAA as a licensed sector. This has principally been due to the health and safety risks to workers operating in waters where tidal changes can be life threatening away from the shore. While there was an increase in referrals during the COVID-19 pandemic there is limited evidence of exploitation hence the lower marking. In some communities, shellfish gathering has been found to be a family or social pastime. Our assessment therefore is that the impact score is now reduced from B to C/D.

Table 2.2: Sectors assessed to be at highest risk of labour market non-compliance

Sector SIC	Description	2022 Impact of Non-compliance	Trend	2021 Impact of non-compliance	Commentary
01 Crop and animal production, hunting and related service activities	Agriculture	A	No change	A	The agriculture sector has been a historical high-risk sector as a GLAA licensed sector. The ongoing conflict in Ukraine has reduced the supply of European seasonal workers into the sector since early 2022. Labour providers subsequently widened their reach of recruitment to other regions and countries such as Central Asia, Nepal and Indonesia. There have been complaints of job finding fees in their home countries which is unknown to UK enforcement prior to entry to the UK. In January 2023, GLAA obtained a STRO against the directors of a Nepalese employment business and suspended their licence to supply labour into UK regulated sectors[3]. (See Box 2.1 and Figure 2.1 below)
41 Construction of buildings	Construction	A	No change	A	No change in assessment, with increased material costs alongside labour shortages meaning continuing pressures on profit margins for employers.
43 Specialised construction activities	includes interior construction activity	A	No change	A	
81299 Cleaning services (other than disinfecting and extermination services) n.e.c.	Hand car washes	A	No change	A	No change in assessment, with continued enforcement action by HMRC NMW and GLAA alongside other partners
52 Warehousing and support activities for transportation		B	Decrease	A	This change resulted from slight reduction in Category A behaviour. The sector has seen a large increase in employment due to the further increase in online retail since the pandemic.

3 Gangmasters and Labour Abuse Authority (2023)

Sector SIC	Description	2022 Impact of Non-compliance	Trend	2021 Impact of non-compliance	Commentary
87 Residential care activities	Care sector	B	Increase	B/C/D	Op Topaz has identified a large amount of non-compliant behaviour and multiple risks for stakeholders. While Op Topaz represents one worker population (involving overseas workers) in the sector the overall score for the sector has been increased due to the increase in number of cases and understanding under Op Topaz. Other at-risk worker populations include the general population of UK care sector workers that are at risk of NMW non-payment and, micro-employers where employers may be personal care budget holders or carers seeking holiday cover reflecting different employment models and business practices.
Models		B	No change	B	No change in assessment.
Online recruitment fraud		B	No change	B	No change in assessment. Because of the cost-of-living crisis some workers are looking to increase their income through new work or training opportunities which is exploited by fraudsters. Workers are more vulnerable, and the volume of fraud has increased though the types of fraudulent behaviour remain the same. There is also an overall increase in fraud in the UK. The National Fraud Intelligence Bureau reports that annual reports of fraud in the year ending March 2022 were 17 per cent higher than the year ending March 2021, and 25 per cent higher than the year ending March 2020.
10 Manufacture of food products	Food processing & packaging	B/C	Decrease	A	GLAA reduced their assessment of modern slavery in this licensed sector.
96020 Nail bars		B/C/D	No change	B/C/D	The subsector comes under Hair and Beauty with a lower non-compliance threat across the worker population. However, there is a risk of higher harm to workers through modern slavery and illegal working.

Source: ODLME Risk Model

Box 2.1: Seasonal Workers: volumes and source countries, 2021 and 2022

In 2022 the number of visas available under the Seasonal Worker Visa scheme was increased from 30,000 to 40,000 (and will rise to 45,000 in 2023). The late announcement by the Government of this change combined with the Russian invasion of Ukraine in February 2022 created serious recruitment challenges for the scheme operators.

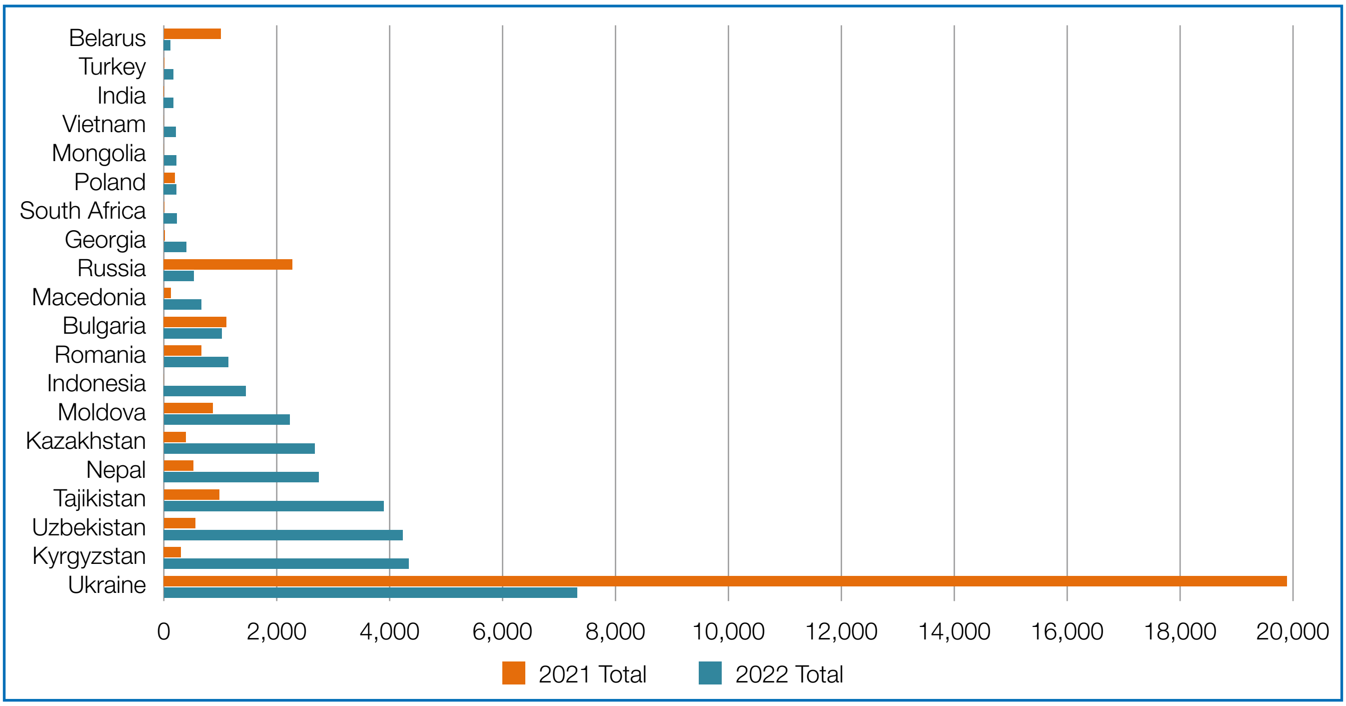
In 2022 34,532 seasonal work visas were issued, compared with 29,587 in 2021, while the number of source countries for labour increased from 58 to 61.

The composition of the seasonal labour force in 2022 was also heavily impacted: in 2021 two-thirds (67 per cent) of seasonal work visas were issued to Ukrainian nationals. This fell to 21 per cent as 12,500 fewer Ukrainians came to the UK via this route in 2022 (Figure 2.1).

Some 15,140 visas were issued to nationals from Central Asia (Kyrgyzstan, Uzbekistan, Tajikistan, Kazakhstan) in 2022 compared with only 2,231 in 2021.

A further 4,201 came from Nepal and Indonesia in 2022, compared with 518 in 2021 (all from Nepal).

Figure 2.1: Source countries for seasonal agricultural workers, 2021 and 2022



Source: Home Office (2023a) Entry Clearance Visa Outcomes

Box 2.2: Joint enforcement in the care sector

GLAA investigations in late 2021 and the subsequent adoption of Op Topaz have highlighted the widespread nature of the threat of non-compliance in the care sector. The risk was increased by the addition of care workers to the skilled occupation list in December 2020 and their addition to the Health and Social Care Visa in January 2021.

While the risks seen in Op Topaz reflect one type of working in the care sector, the threat level for the whole sector has been increased in the ODLME risk model this year. Other worker populations at risk within the care sector include UK workers due to the low pay levels as well as patients utilising personal care budgets who may become employers for the first time and lack awareness of their responsibilities to the worker.

Op Topaz is a multi agency response involving law enforcement, regulatory bodies, and other stakeholders. The main threat in terms of labour non-compliance is illegal working in different guises, and subsequent exploitation, however the care sector is extensively regulated and there is evidence of wider risks of non-compliance affecting multiple stakeholders across UK government. While the modus operandii has been found in the care sector, it is not unique to the care sector and work is ongoing to look at these sectors.

The following **non-compliance risks** have been assessed through Op Topaz, though are not common to all cases.

Before arriving in the UK, migrant workers may be subject to debt bondage if charged work-finding or sponsor fees in their home country to facilitate working in the UK. The visa for sponsorship for employment or educational purposes may also be obtained fraudulently. Employers in the care sector in the UK will be unsighted to this and the first opportunity for a worker to complain is upon entry to the UK.

Once in the UK the migrant worker or student may be working illegally by abusing their visa (e.g., working in excess of permitted hours); working legally but exploited (e.g., unlawful deductions from wages); or education providers not reporting non-attendance.

- **Illegal working (employer):** ranging from failure to conduct necessary identity or right to work checks, to fabricating evidence for these checks to employers being complicit in using illegal workers.
- **Residential care:** Negative impact on the provision of care for the vulnerable within a care facility.
- **Domiciliary care:** In addition to the risks in residential care, workers may be unsupervised within a person's own home.
- **Health and Safety**: risks here range from unknown or unqualified persons working with vulnerable patients to deliberately non-compliant care facilities posing quality of care risks for patients.

The list of risks demonstrates the vulnerability of the care sector before Op Topaz, as well as the complex and overlapping scope of risks for stakeholders, including:

- The care sector is suffering labour shortages so the investigation of cases and the prospect of removing illegal workers from the sectors has an impact on the provision of care.

- The risks encountered by the enforcement bodies cover labour abuse for the GLAA, supply of labour through employment businesses for EAS and the entitlement for National Minimum Wage for HMRC NMW. The off-record workforces found in some examples indicate the potential tax evasion for HMRC Taxes. Police forces investigate serious cases of abuse.
- The Department for Health and Social Care and the Care Quality Commission regulate the provision of care, while local authorities operate their own facilities as well as licence Houses of Multiple Occupation (HMOs).

Section 3: Existing estimates of Labour Market Non-compliance

As with previous LME Strategies, the absence of reliable data and information to undertake an assessment of non-compliance in the labour market means we must rely on a series of proxy measures for each of the three areas under my remit, namely:

- Minimum wage underpayment
- Severe labour exploitation
- Employment agencies.

Each is considered in turn below.

3.1 Minimum wage

Our understanding of minimum wage risk is informed by the work of the Low Pay Commission (LPC), using data from the ONS' Annual Survey on Hours and Earnings (ASHE).

Conceptually, there are two key measures used:

- **Minimum wage *coverage*** – includes all employee jobs paid up to 5 pence above the age-related minimum wage.
- **Minimum wage *underpayment*** – includes all employee jobs paid below the relevant age-specific minimum wage.

Coverage can then be presented as a share of all employee jobs (by age group), while underpayment can be expressed as a share of coverage.

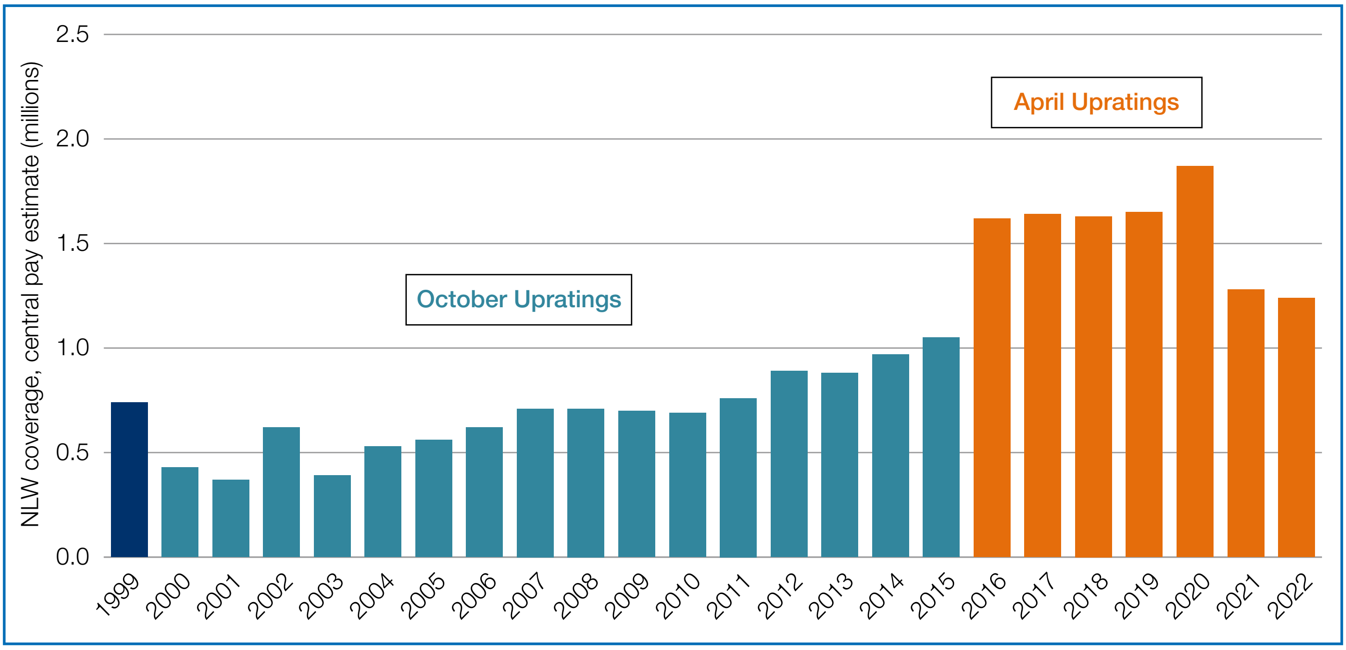
(i) Minimum wage coverage – overall

The LPC estimates that 5.4 per cent of employee jobs are paid either at or below the NLW/NMW. Coverage is higher for those in part-time (around 12 per cent) and temporary jobs (just under 8 per cent), as well as among workers aged under 25 or over 65 (over 9 per cent). Since 2016 there has been marked downward convergence in coverage rates by ethnicity and country of birth, though coverage remains relatively high among Bangladeshi and Pakistani groups[4].

In small firms with fewer than 50 employees almost 12 per cent of employee jobs are paid at or below the minimum wage. This compares with just 3 per cent in large firms (250+ employees). Coverage has fallen across all firm sizes but less so among smaller firms.

4 Low Pay Commission (2023a), Figure 3.4

Figure 3.1: Number of employee jobs covered by the NMW/NLW, 1999-2022, workers aged 25 and over



Source: Low Pay Commission (2022); Note: estimates for 2020 and 2021 are less robust due to data issues during the pandemic

(ii) Minimum wage coverage – by sector

LPC provides sectoral analysis of minimum wage coverage and how this has changed since 2019.

Almost half of all minimum wage jobs are in *retail*, *hospitality*, *cleaning* and *social care* (762,000), but the number of jobs in these sectors has fallen by 289,000 since 2019 (coverage in *social care* has halved).

Table 3.1: Minimum wage coverage by sector, UK, 2019 and 2022 (000s)

	2019	2022	Difference
Retail	346	248	-98
Hospitality	335	250	-85
Cleaning	266	212	-54
Social Care	104	52	-52
Other Low-Paying Sectors	530	418	-112
Non low paying sectors	400	390	-10

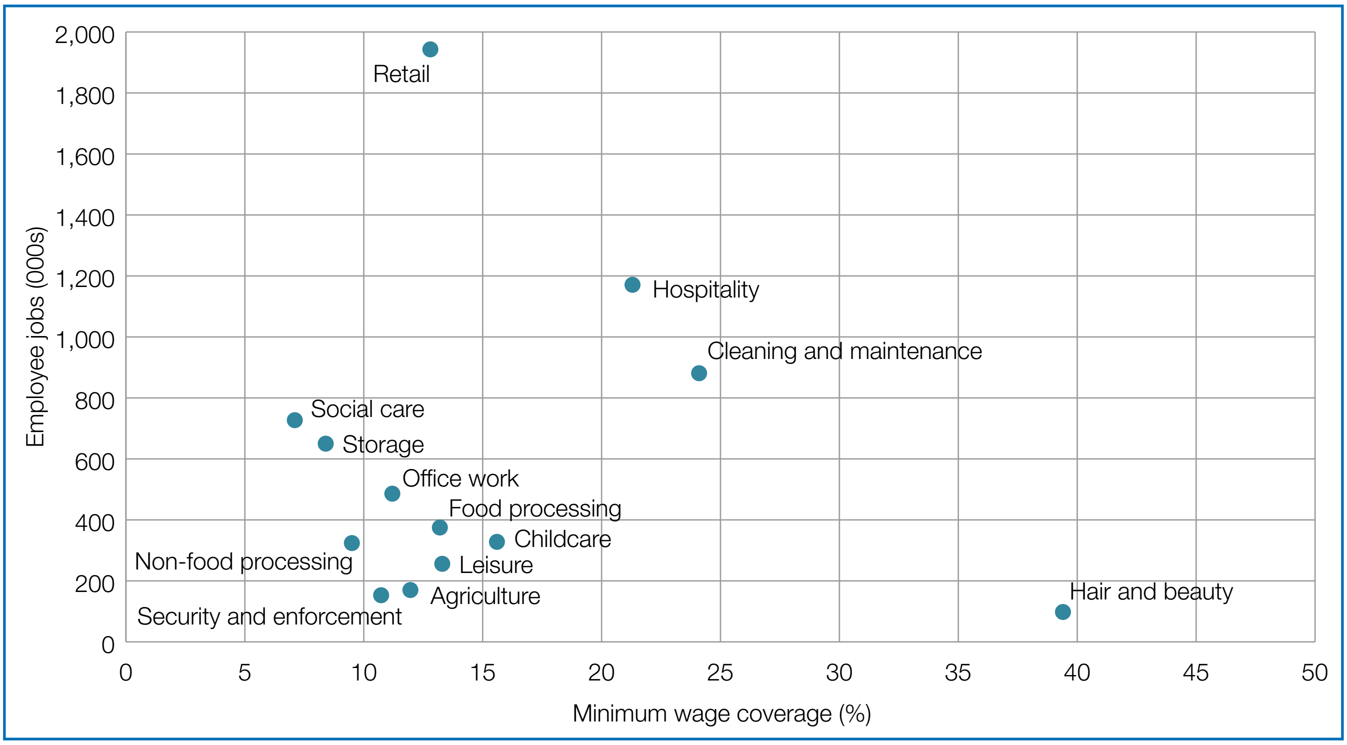
Source: Low Pay Commission (2023a) Table 3.4

A key feature of ODLME's approach to assessing labour market risk is to consider this on a sector basis. Enhancements made to our own risk modelling now take greater account of the wide variations that exist between sectors in terms of scale of employment.

Figure 3.2 below demonstrates the relationship between coverage and total employee jobs by sector. In *retail*, which has almost 2 million jobs, only 13 per cent are estimated to be paid at or below the minimum wage. By contrast, there are 98,000 jobs in the *hair and beauty* sector, but minimum wage coverage is almost 40 per cent. Between these extremes *hospitality* and *cleaning* stand out as having both a large number of employee jobs (1.2 million and 0.9 million jobs respectively), but also relatively high (20 per cent or more) coverage of jobs paid at or below the minimum wage. Among small firms in *retail*, *hospitality* and *cleaning* coverage is a third or greater.

The results for *social care* are noteworthy too. With an estimated 727,000 employee jobs, only seven per cent were judged to be paid at or below minimum wage. Evidence from Skills for Care suggests care workers were paid on average between £9.66 (median £9.50) in the independent care sector and an hourly rate of £11.03 in the local authority sector in 2021/22 (when the equivalent National Living Wage was £8.91) (Skills for Care 2022).

Figure 3.2: Total employee jobs and minimum wage coverage by sector, 2022



Source: Low Pay Commission (2023a) Additional data

(i) Minimum wage coverage by region and nation

Table 3.3 below presents LPC estimates of minimum wage coverage for the English regions and the devolved administrations. This suggests minimum wage coverage is relatively lower in Scotland (4.4 per cent of employee jobs), relatively higher in Northern Ireland (8.1 per cent) and with Wales around the UK average (5.6 per cent). In England coverage is lowest in London (3.4 per cent) and highest in the Northeast (7.6 per cent).

Table 3.2: Coverage of the NMW/NLW rates for workers aged 16+, ranked by coverage proportion, by region and nation, UK, 2021

Region/Nation	Coverage	Per cent
Scotland	**111,000**	**4.4**
Wales	**70,000**	**5.6**
Northern Ireland	**101,000**	**8.1**
England regions		
North East	81,000	7.6
West Midlands	172,000	7.1
East Midlands	132,000	6.8
Yorkshire and the Humber	149,000	6.3
North West	174,000	5.8
East of England	131,000	5.1
South West	122,000	5.1
South East	183,000	4.5
London	145,000	3.4
UK	**1,570,000**	**5.4**
Source: Low Pay Commission (2023a)		

Following a recommendation from the LPC, the government announced in November 2022 that the hourly National Living Wage would increase from £9.50 to £10.42 in April 2023.

This increase of almost 9.7 per cent will apply across all age-specific rates and the National Living Wage[5]. The LPC projects that as a result minimum wage coverage will increase once again to between 2.03 million and 2.78 million. As a proportion of all employee jobs coverage would be between 7 per cent and 9.6 per cent, indicating a return at least to 2019 levels.

These projections do not include a sector breakdown, but the expansion of coverage may have differing impacts by occupation and industry and may even begin to bring new sectors/occupations into consideration. Should strong pay growth persist into 2023, then some of this increase in coverage – both overall and by sector – would be offset to some extent.

(ii) Minimum wage underpayment – overall

According to the LPC, around a third of a million (334,000) employee jobs were paid below the minimum wage in 2022, which is 94,000 fewer than in 2019. Despite this fall, at around one fifth, underpayment remained broadly the same as a share of minimum wage coverage (Table 3.3).

The majority of underpayment (260,000) was in employee jobs for those aged 25 and over (i.e., those entitled to the National Living Wage).

5 The exception here is the rate for those aged 21 to 22, which rises by 10.9 per cent.

Table 3.3: Number and percentage of employee jobs paid below the minimum wage by rate population, UK, 2019 and 2022

Age	Underpayment		Coverage		Underpayment as share of coverage	
	2019 thousands	2022 thousands	2019 thousands	2022 thousands	2019 per cent	2022 per cent
25+	364	260	1649	1,235	22.1	21.1
23-24	12	30	57	103	21.6	29.1
21-22	20	22	98	80	20.9	27.5
18-20	19	12	116	82	16.3	14.6
16-17	3	2	36	25	9.4	8
Apprentice rate	9	8	31	31	29.7	25.8
Total	428	334	1,987	1,557	21.6	21.5

Source: Low Pay Commission (2023b) Table 1.1

(iii) Minimum wage underpayment – by sector

The Department for Business and Trade (formerly BEIS) also estimates the number of jobs paid below the minimum wage by sector. (Figure 3.3) (BEIS 2022)[6].

By volume of jobs, *retail*, *hospitality* and *cleaning and maintenance* had the highest volumes of jobs paying below the minimum wage, representing between 1.5 per cent and 3 per cent all jobs in each of these sectors.

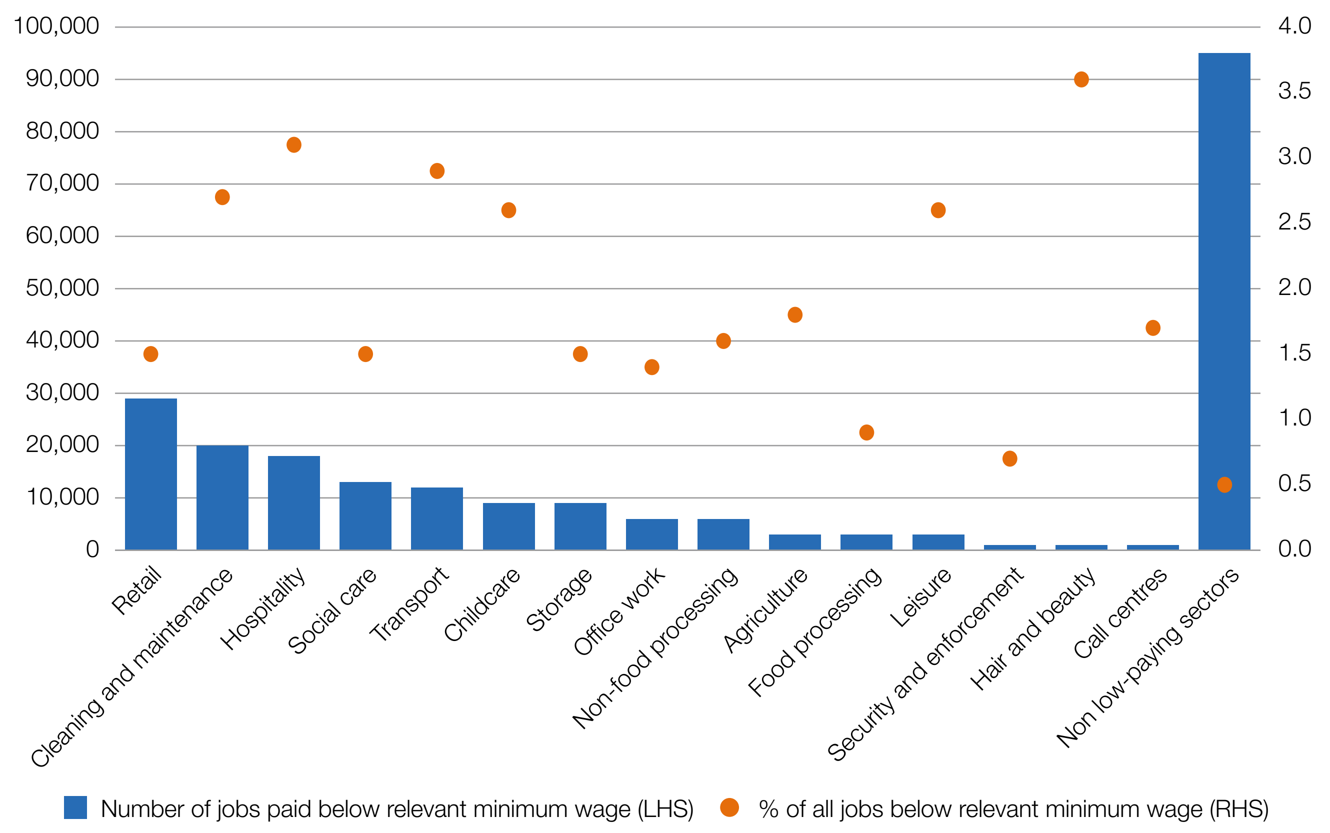
The highest share of jobs paid below minimum wage is estimated at 3.6 per cent in the *hair and beauty* sector, though this equates to just 1,000 jobs. Around 12,000, or 2.9 per cent of all jobs, in *transport* are assessed to pay below minimum wage.

It is noteworthy that again in *social care* both the total and share of jobs paying below minimum wage are relatively low (13,00 jobs and 1.5 per cent of all social care jobs respectively).

Triangulating these estimates with the intelligence used in our risk modelling work (Section 2 above) highlights the challenges faced in determining robust measures of non-compliance. The ODLME-led research project discussed in Section 4 below should help shed further light on this.

6 Data are presented here for illustration for 2021 due to reliability issues with the 2022 data. For more information see Office for National Statistics (2023d)

Figure 3.3: Estimated number of jobs paid below the minimum wage by sector, April 2021



Source: Department for Business Energy and Industrial Strategy (2022)

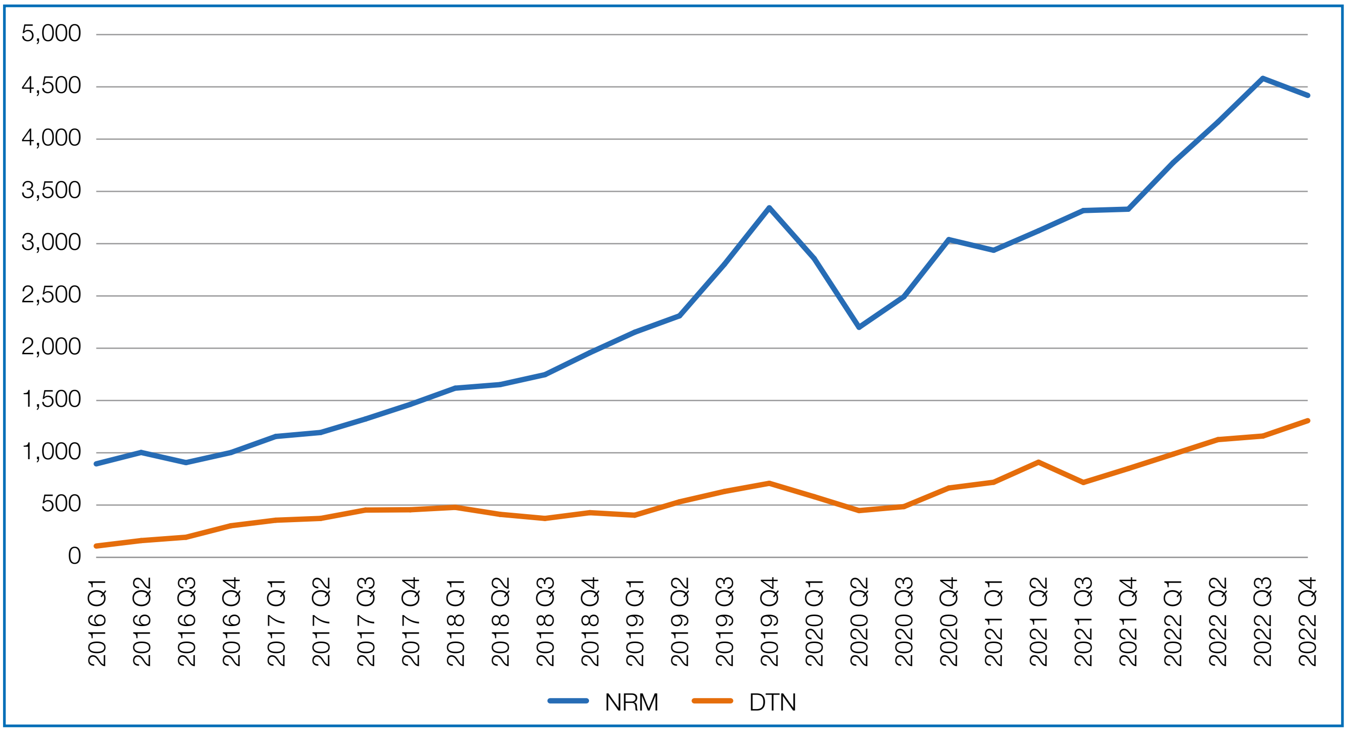
3.2 Labour exploitation

Quarterly Home Office national Referral Mechanism statistics provide the best available measures for trends in modern slavery and, within this, severe labour exploitation.

Over recent years there has been a trend increase in the number of referrals of potential victims into the National Referral Mechanism (NRM) for all types of modern slavery. Total NRM referrals are now around 4,000 per quarter, a fourfold increase since 2016. Hence, in 2022 there were almost 17,000 potential victims, of which around half suffered exploitation in the UK only, 41 per cent were exploited overseas and ten per cent had experienced exploitation in both the UK and overseas.

In addition to NRM referrals individuals can be reported under Duty to Notify (DtN) where first responders identify a potential victim of modern slavery, but the individual chooses not to enter the NRM. Although the volume of DtNs remains much lower than that for NRM (around 1,000 per quarter), there has been a six-fold increase since 2016.

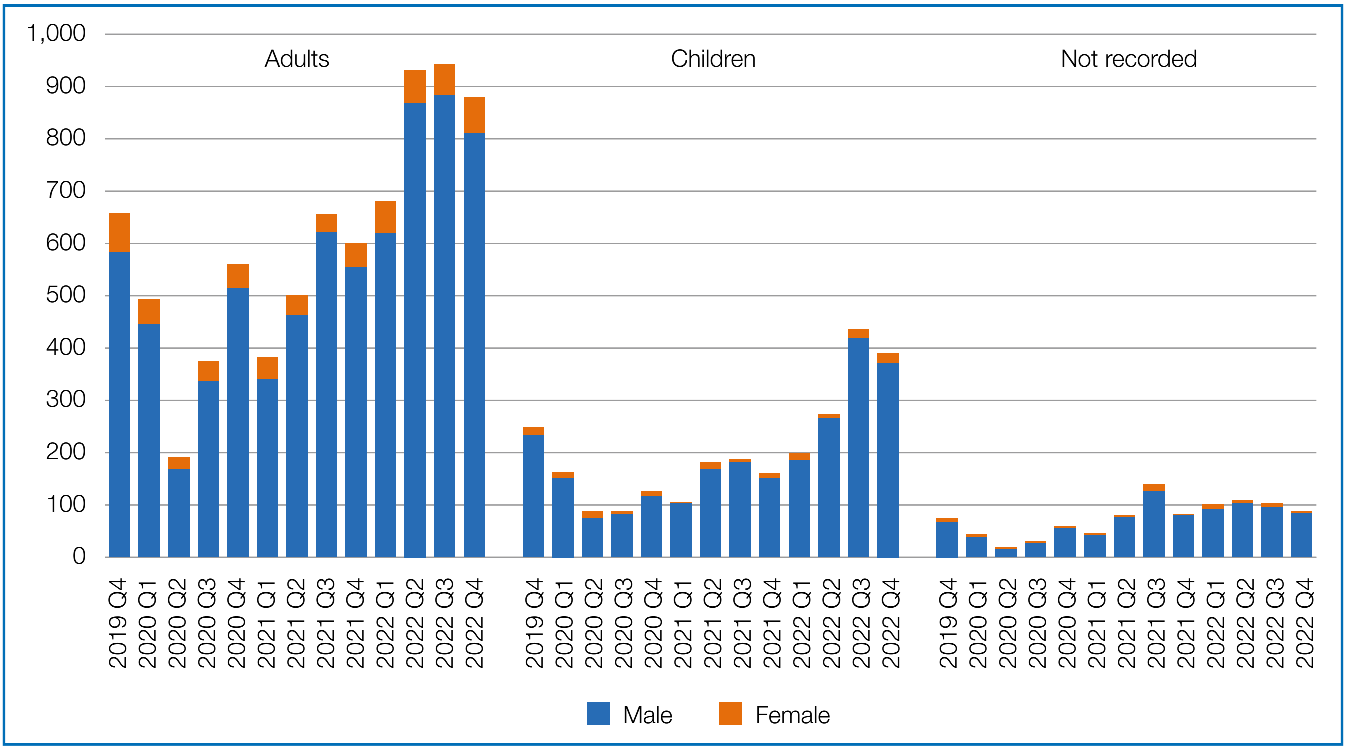
Figure 3.4: NRM Referrals and Duty to Notify Cases, UK, 2016Q1 – 2022Q4



Source: Home Office (2022e) (4-quarter moving average)

Labour exploitation is the most common type of modern slavery identified among potential victims (29 per cent of all modern slavery referrals over the past year) and, again following the COVID-19 pandemic, the volume of referrals has been rising. This type of modern slavery mainly affects adults – though the number of referrals for potential victims of labour exploitation who are children has also risen sharply recently. Overall, 94 per cent of potential victims of labour exploitation are male (Fig 3.5 below).

Figure 3.5: NRM referrals for labour exploitation only by age and gender by quarter, UK, 2019Q4-2022Q4



Source: Home Office (2022b-e)

Changes to the way exploitation types are recorded were introduced by Home Office from 2019Q1 (See Box 3.1). Comparable data are not available for labour exploitation before this date.

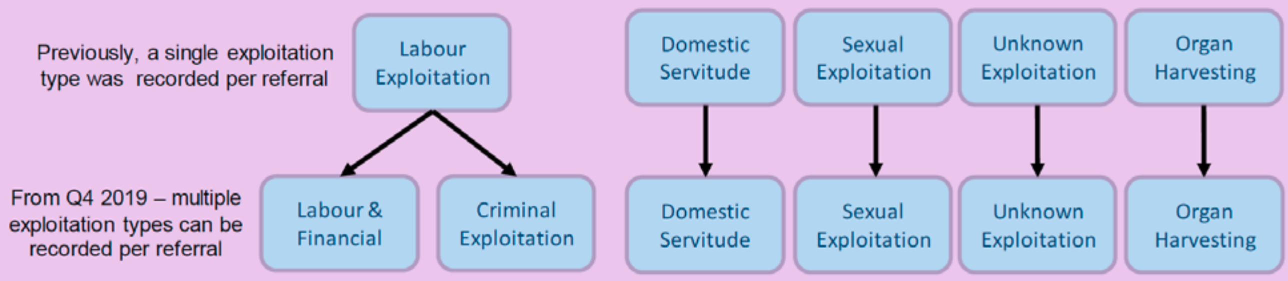
Whereas previously potential victims were recorded under one exploitation type only, the new approach allows identification of multiple exploitation types. As such, beyond the 4,622 potential victims identified for labour exploitation only, a further 3,000 (or 19 per cent of all NRM referrals) experienced labour exploitation alongside other types of modern slavery. Most commonly this is criminal exploitation or, especially among female potential victims, sexual exploitation.

Box 3.1: Changes to recording modern slavery exploitation type

Changes to recording of exploitation type

Prior to 1 October 2019, potential victims of modern slavery were recorded as having a single 'primary' exploitation type, grouped into five distinct categories: labour, sexual, domestic servitude, organ harvesting or unknown exploitation (Figure 2). Following changes to the way NRM data is collected, recording of exploitation types has changed to give a better picture of the exploitation experienced by potential victims. As a result, for referrals received from 1 October 2019, criminal exploitation has been split from labour exploitation. In addition, potential victims can be also be recorded as experiencing multiple exploitation types and, as such, caution should be taken when comparing exploitation type statistics from quarter 4 with previous quarters, as the primary exploitation type is unknown. Furthermore, some breakdowns provided in previous statistical releases by certain characteristics and exploitation type have not been provided in the data tables to avoid comparisons with previous quarters.

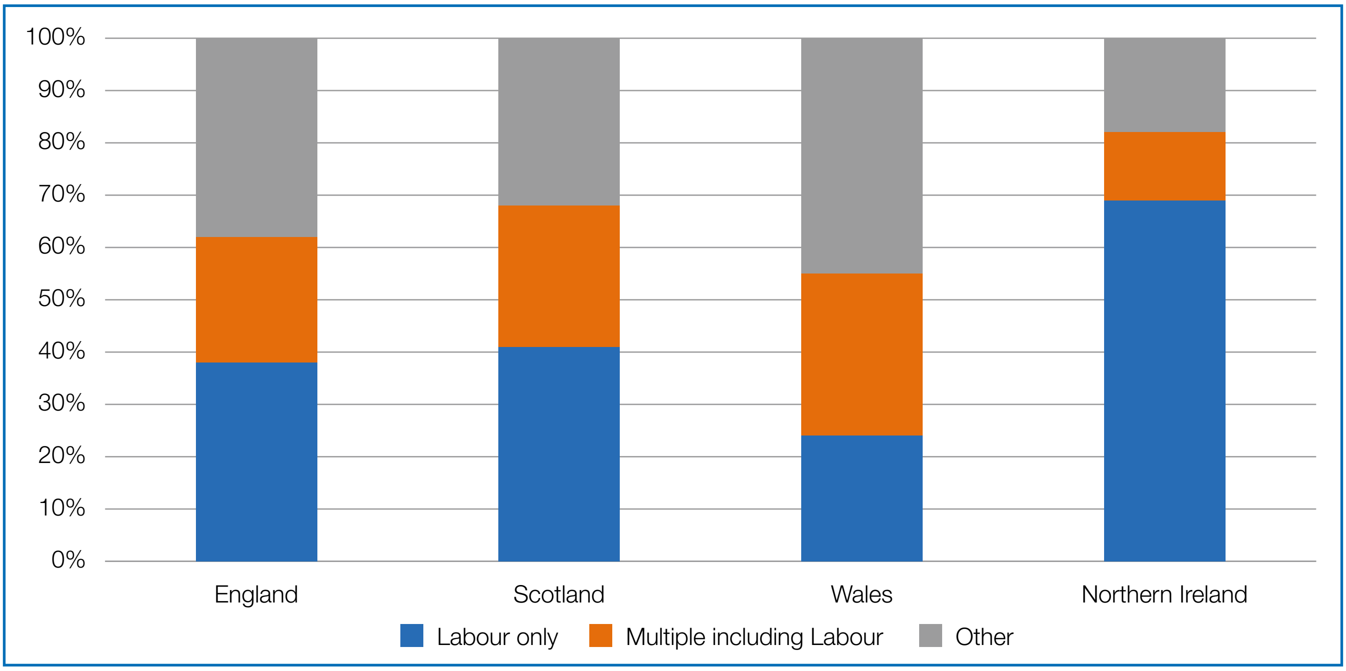
Figure 2: Changes introduced to recording procedure of exploitation types in the National Referral Mechanism, from 1 October 2019



Source: Home Office (2020)

Across the four nations of the UK these patterns of exploitation by type have been broadly comparable over the past year, with the exception of Northern Ireland where more than two-thirds (69 per cent) of referrals were for labour exploitation only, with a further 13 per cent involving multiple exploitation including labour (Figure 3.6).

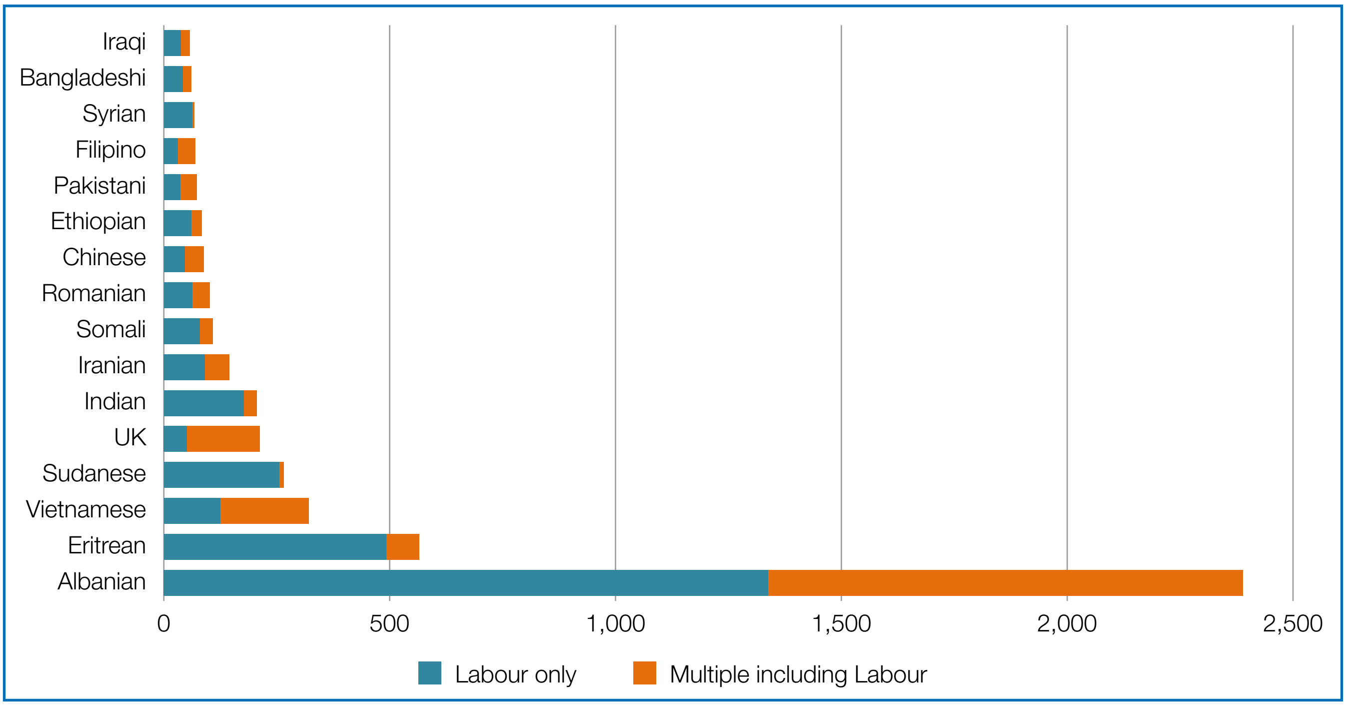
Figure 3.6: NRM referrals for adult potential victims by modern slavery type by devolved administration, 2022



Source: Home Office (2023b)

In 2022 labour exploitation was most common among Albanian nationals where more than 1,300 adult potential victims were referred for labour exploitation only. (A further 1,000 Albanian adults were referred where labour exploitation was part of multiple exploitation.) Eritrean was the next most common nationality referred for labour exploitation itself (492 potential victims). Only around 1.5 per cent of adult labour exploitation referrals were UK nationals.

Figure 3.7: NRM referrals for adult potential victims for labour exploitation only, UK, 2022



Source: Home Office (2023b), Table 6

The nationality of adult potential victims of labour exploitation only also differs across the UK (Table 3.4). The share of potential labour exploitation victims who are Albanian nationals is much higher in England (44 per cent) than in the devolved administrations. Eritrean and Somali nationals accounted for almost 80 per cent of potential victims in Northern Ireland.

Table 3.4: Adult potential victims of labour exploitation by nationality across UK, 2022

England	Scotland	Wales	Northern Ireland
Albanian – 1,300	Albanian – 32	Sudanese – 7	Eritrean – 144
Eritrean – 317	Eritrean – 27	Albanian – 5	Somali – 46
Sudanese – 224	Vietnamese – 21	Eritrean – 4	Sudanese – 13
Indian – 170	Iranian – 19	Vietnamese – 4	Syrian – 10
Others – 973	Others – 67	Others – 20	Others – 28

Source: Home Office (2023b), Table 6

3.3 Employment agencies

Up to date data from the ONS on developments in the recruitment business and agency sector are not yet available beyond 2020. As such, our understanding of recent trends and developments in this area is more limited. We have therefore used data from the Recruitment and Employment Confederation (REC) to help to fill this gap.

In 2022 there were just over 30,000 recruitment enterprises, around 600 fewer than in 2021 and the fourth consecutive year of decline since the peak of 31,365 enterprises in 2019.

Around a third of recruitment enterprises operate as temporary employment agencies, but the temporary agency market accounts for 85 per cent of the estimated £43 billion contribution the recruitment sector makes to the UK economy. Temporary employment agencies undertook 22.4 million temporary/contract placements in 2021. This compares to 548,000 made by permanent placement enterprises.

Movements in the recruitment sector – especially comparing trends between permanent and temporary hiring – can serve as a helpful barometer of the overall direction of the labour market. For instance, businesses may be more inclined to use temporary workers in a more uncertain economic climate.

REC's latest survey of the sector (Recruitment and Employment Confederation 2023) based on responses in January 2023 indicates that:

- hiring in the temporary recruitment market has started to pick up in 2023, having been on a downward trend since August 2021 and bottoming out in autumn 2022.
- the number of permanent placements is still falling, continuing a contraction that began in October 2022.

3.4 Concluding comments

On the basis of the proxy indicators presented above there is reason to conclude that labour market non-compliance risks have increased and are likely to continue to increase over the coming year.

- The marked rise in the NLW and NMW in April 2023 will significantly expand the numbers of jobs falling into scope of the minimum wage, and the concern will be that non-compliance here continues to grow alongside this.
- Severe labour exploitation – measured by NRM referrals – shows little sign of reversing its continued upward trend. Although predominantly affecting adult males, there should be concern about an apparent increase in labour exploitation among minors.
- Risks in the recruitment sector are more difficult to judge, as the market has been subdued over the past 18 months. However, signs of pickup in temporary hires may well reflect caution on the part of business in an uncertain economic climate.

Section 4: Improving estimates of Labour Market Non-compliance

Under the Immigration Act 2016 the Director has a statutory obligation to provide an assessment of the scale and nature of labour market non-compliance in the UK.

Achieving reliable estimates of the degree on non-compliance is challenging, especially in a labour market where the population most at risk can be hidden. To date the ODLME has relied on a series of proxy measures (see Section 3 above) as a stopgap to provide some of this information.

Following preparatory work carried out in 2019 and 2020, a methodological approach was identified by ODLME to undertake research in this area.

Co-funding was then secured from the Economic and Social Research Council (ESRC) and the Department for Business, Energy and Industrial Strategy (BEIS) for ODLME to run an invitation to tender in December 2021 to commission a large-scale research study into the scale and nature of labour market non-compliance in the UK.

A consortium led by University College London, involving a multidisciplinary research team from UCL and the University of Gloucestershire, supported by FLEX (Focus on Labour Exploitation) launched the new study in June 2022 (Cockbain and Posch 2022)[7].

The project is an innovative mixed-methods study focusing primarily on people in precarious work, who comprise around one in ten of the UK workforce and are widely thought to be at particular high risk of labour market abuse.

The cornerstone of the project is a large-scale, representative survey, which will be administered by KANTAR as an associated study to the Understanding Society Survey: the largest household survey in the world. The survey results will then inform complementary in-depth interviews with people in precarious work, and focus groups with workers and employers.

Labour market non-compliance and related labour market abuse are complex and wide-ranging phenomena. The first six months of the project have therefore involved extensive survey development, focusing on survey conceptualisation and operationalisation.

The project benefits from the involvement of diverse stakeholders who have been consulted in depth through six project advisory groups comprised of: legal experts; labour abuse academics; policymakers and practitioners; worker rights representatives; employer representatives; and – crucially – people in precarious work themselves. Their input has been invaluable to produce a viable survey instrument that accurately reflects the complex legal and social realities of labour market non-compliance.

7 For more information visit the project page at https://www.ucl.ac.uk/jill-dando-institute/research/assessment-scale-and-nature-labour-market-non-compliance-uk

At the current time (January 2023) the draft survey is undergoing testing by KANTAR and will then be refined and translated into multiple languages ahead of a forthcoming pilot later in 2023.

In the meantime, the research team will also conduct a longitudinal analysis of people's trajectories through precarious work, based on existing Understanding Society Survey data, which will inform the delivery of the final survey.

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