



FLEX statement on the ‘New Plan for Immigration’

FLEX has responded to the government’s consultation on the ‘New Plan for Immigration’ (the plan/proposal). FLEX’s work focuses on preventing labour exploitation. This submission provides a response to all questions where our area of expertise is relevant to inform the developments of this proposal. With the recognition that adequate and robust support and protections are a key element to prevention, our response primarily looks at the plan with the aim of reducing risk of labour exploitation.

You can find a copy of our response [here](#).

Overall, FLEX strongly opposes the proposal and finds the consultation process inadequate considering the significance of the proposed changes. The plan does not provide sufficient evidence to justify the proposed changes and the public resources and expenditure the changes would involve. It has also been difficult to provide feedback and assessment on certain areas of the plan due to the lack of detail surrounding many of the proposals. FLEX also considers the consultation period insufficient to consider and address the magnitude of the plan. It is essential that the government allows for a proper consultation, so that any change in policy is based on evidence and monitored through independent evaluation. We ask the government, and emphasise the need, for further and continued opportunity to feed into the proposal as it evolves.

Turning to the plan itself, though FLEX agrees that the asylum and trafficking system are in need of reform, FLEX is concerned that reforms in relation to the UK’s modern slavery identification and support system are being considered within the context of this immigration plan. Further, FLEX considers that the plan if implemented would place individuals at increased risk of harm, labour abuse and exploitation. There is risk that the proposals would result in a reduction of identification of potential victims of trafficking and modern slavery, and correspondingly, a reduction in the identification of trafficking networks and prosecution of perpetrators.

“FLEX is extremely concerned that individuals who need protection and support would, as a direct and indirect consequence of these plans, be driven into exploitative circumstances.”

Ultimately, FLEX believes elements of the plan are inconsistent with and undermine the UK’s Modern Slavery priorities, as well as its legal obligations, including in relation to victims of trafficking. Within our response we make recommendations for reforms that the UK could implement, and that we consider would support a fair approach, whilst reducing risk of exploitation and harm. These recommendations include removing barriers to work for asylum seekers and victims of trafficking, ensuring that victims of trafficking are not detained or

imprisoned under immigration powers, establishing secure reporting pathways and increasing access to quality funded legal advice and representation.

FLEX's underlying position and recommendation is that **all workers, regardless of employment and immigration status, should be able and supported to report abuse and access vital protections**. Such an approach is necessary, not only to protect individuals and promote redress, but in order to deter labour abuse and exploitation from taking place.

6 May 2021

Focus on Labour Exploitation

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