

Creating a Sustainable Adult Social Care Workforce: International Recruitment 24/25 in West Midlands Interim Learning & Evaluation

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Dr Kathryn Hudson PhD
West Midlands ADASS Associate

This young woman from Nigeria was sponsored by an organisation who were “under investigation” and was told she had to find another job or “be deported” ... she has family in Coventry. The local authority International Recruitment lead worked to support her and received this feedback:

‘I went for the interview today, and I passed the interview. Thank you so much for your help and support I really do appreciate it.’

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Executive Summary

1. Introduction

This interim learning and evaluation report reviews the further development of a West Midlands International Recruitment model during 24/25, funded through a Department of Health and Social Care (DHSC) £1.84 million grant.

During 23/24, WM ADASS worked in partnership with West Midlands Employers, West Midlands Care Association, Shropshire Council, and 13 other local authorities across the region to develop regional and local initiatives to support care providers to ethically recruit international care workers.

Evidence emerged, nationally and locally, of unethical recruitment practice by some care providers. In cases where unethical practice was found, licences to sponsor international workers were revoked from the care providers, leading to some international care workers being displaced from their original sponsor organisation.

The 24/25 International Recruitment (IR) Programme is focused on supporting displaced international care workers into new employment with another care provider sponsor.

West Midlands is building on the partnership infrastructure and governance, developed in the first year of the programme, to create strategies for preventing and addressing exploitative employment practices, while also supporting the continuity of care provision.

The purpose of this interim report is to describe the development of the regional international recruitment model, highlight the learning to date and provide an opportunity to shape the final evaluation of the programme.

Over the next six months, the impact of the interventions included within the model will be evaluated, with consideration given to a sustainable approach to preventing and addressing exploitative employment practices, while also supporting workforce initiatives to sustain the adult social care sector. A final evaluation report will be completed in autumn 2025.

2. International Recruitment – a West Midlands context

Between March 2022 and March 2024 an estimated 185,000 people have started direct care providing roles in the independent sector, having arrived in the UK during that period (80,000 in 2022/23 and 105,000 in 2023/24). International recruitment within adult social care has contributed to the growth in the number of senior care worker and care worker filled posts in the workforce. This in turn has led to an overall increase in filled posts in adult social care in England and has contributed to turnover and vacancy rates decreasing (Skills For Care, 2024). Within West Midlands the number of international care workers increased by 2,500 (up to 10,500) between 22/23 and 23/24 (Skills For Care, 2024).

West Midlands has 2,274 CQC registered care providers, with 37.6% identified as international recruitment sponsors. In September 2024, data collected via the WM ADASS data hub, noted that 27 West Midland care providers had had their sponsorship licences revoked in the previous 120 days, i.e. 1.1% care providers representing approximately 1,700 international care workers. By January 2025, the total number of revocations in the West Midlands was 57 affecting around 3,900 international care workers.

The WM International Recruitment Model has been developed to ensure that contact is made with each of the displaced international care workers, signposting then to appropriate support, including into new employment where possible. The model was developed by 31 December 2024 and support is now firmly in place to provide support to international recruits affected by sponsorship revocation and to support care providers to ethically recruit.

3. Overview of WM International Recruitment Model

At January 2025, the WM International Recruitment Model includes the following core elements of support for displaced international care workers:

- **Regional Mailbox delivered by West Midlands Care Association.** All enquiries from displaced workers contact this mailbox and their circumstances are triaged before onward signposting to further support is provided. To date, there have been approximately 800 enquiries to the regional mailbox.

Depending on the nature of the enquiry, individuals may receive support from one or more of the following initiatives:

- **Legal and HR support Hub led by West Midlands Employers** includes a helpline run by Lester Aldridge Solicitors. The hub is also available for care providers and councils to access.
- **MyUKLife – online support platform provided by Brigid Care.** Information, advice and guidance on living and working in the UK, which includes CV review function.
- **Lifted (Sponsorswitch) – online platform** provides direct support for displaced international recruits to be placed with a new sponsor/employer following the appropriate UKVI and Home Office checks being undertaken.
- **Direct local support provided by councils.** This includes a range of initiatives from modern slavery and safeguarding support to working with care providers, the voluntary and community sector to provide pastoral support, training and employment introductions.

The key to the development of the WM International Recruitment Model in this short space of time has been the governance in place for WM ADASS with Shropshire Council acting as the host authority for the programme funding on behalf of the region.

Key governance considerations that have supported delivery of the programme include establishing an IR Lead DASS for strategic direction, being accountable to West Midlands ADASS Branch of Directors through regular programme updates, hosting a monthly Partnership Steering Group to inform the work and keep key partners updated, as well as a monthly IR Local Authority Leads meeting to exchange learning. Assistance on safeguarding advice in the development of the model has been crucial and is available to support the continued implementation and learning.

4. Challenges to recruiting internationally

The Programme Team are continuously reviewing key challenges to recruiting international care workers to identify potential solutions. These include:

- Costly and difficult visa process – over £2000 per person when Home Office Fees, background and recruitment checks and sponsorship license support are taken into account. This is significant for care providers who are mainly SMEs.
- Lack of clarity on some aspects of the UKVI process, such as the position regarding the 60-day notice of cancellation of the Certificate of Sponsorship.
- Practical barriers such as not having a UK driving license or access to a vehicle for work purposes.
- High number of people following triage through the mailbox, identified as difficult to place into new employment, for reasons such as health issues or not having the right care skills or experience.
- Impact of National Insurance / National Minimum Wage on care providers poses new questions about the future role of and demand for international recruitment.
- Safeguarding/exploitation intelligence picked up particularly around unethical recruitment practice.

5. Best practice examples from local authorities

Despite some of the challenges, the significant contribution made by so many skilled international care workers to the adult social care workforce is acknowledged by regional care providers and local authorities.

The professional and innovative contributions of local international recruitment projects led by councils have been instrumental to the learning for the region and for national policy.

Examples include:

- The initiatives in Coventry and Warwickshire to support displaced international care workers during the first year of the programme informed the development of the second-year grant and the development of the WM International Recruitment model.
- Shropshire, Telford and Wrekin, formed significant partnerships with Citizens Advice Bureau to identify and support displaced international care workers.
- Staffordshire has developed the international recruitment data hub to meet their local needs and gain early insight into potential issues of poor recruitment practice.

6. Summary of emerging learning

The development of the West Midlands International Recruitment Model over the last six months has provided emerging learning to shape the second half of the programme, at local, regional and national level as well informing future policy thinking in this area.

Key learning points include:

- **Ability to drive and access to a vehicle for work.** The requirement by many social care providers for carers to be able to drive and have access to a vehicle for work. The programme is looking at options to support carers to access alternative flexible and safe transport options, because of the significant delay in accessing driving tests currently, and the significant costs for purchasing and insuring a car.
- **Recognising the proactive role of councils.** Many councils are developing quality assurance checks to assess social care provider risk in relation to international recruitment which has the potential to identify and support care providers earlier.
- **Care provider financial challenges impacting demand for IR.** Some adult social care providers are limiting recruitment (including international recruitment) due to upcoming increases in National Insurance and National Minimum Wage.
- **Health Issues.** The work has identified health issues that are emerging for some international care workers and their families. This may not be significant compared to the domestic workforce, but it is a theme to review particularly if there are patterns relating to specific conditions. There are potential implications for improving health screening on recruitment.

7. Tools and resources for councils / partners

As part of this work, a range of helpful tools and resources have been developed including good practice guides and themed webinars on key issues. These are available on our International Recruitment Hub, accessible at www.irwestmids.co.uk

Foreword

This interim report was commissioned as part of the West Midlands ADASS International Recruitment (IR) programme 24/25 to map the learning, with the purpose of sharing the knowledge and practical application of the initiatives for the future in West Midlands and with other regional and national colleagues.

Following significant workforce challenges for social care providers, care workers were added to the Shortage Occupation List and the Health and Care worker visa route in February 2022. This meant that providing workers met the salary thresholds and had a licensed sponsor, they could be recruited to care worker roles in the UK and potentially improve the resilience and sustainability of the care sector.

Most social care providers are Small and Medium Enterprises (SMEs) and do not have the infrastructure to recruit international workers. Phase 1 DHSC IR Grant 23/24 was designed to develop an infrastructure for care providers to recruit internationally. During phase 1, West Midlands developed regional infrastructure support for ethical recruitment and learned of good practice that was helping social care providers to support individual care packages across the region.

Unfortunately, we also learned of significant cases of unethical recruitment practice that was a risk to the care provider market, through suspensions and revocations of licences of care providers to support international care workers, and of displaced international care workers who were in desperate situations without access to paid employment.

This year we have built on the progress towards ethical recruitment in the region, but with a focus on supporting displaced international care workers to access alternative adult social care employment and support in the region. Our aim is to build and maintain a resilient and sustainable adult social care market. To achieve that, we have worked in collaboration with partners to develop an International Recruitment Model that combines support to adult social care providers and international care workers through regional and local support services. We have adopted innovative approaches to encourage early intervention and self-support, including application of AI platforms that can support people in all languages.

I would like to thank all our partners and colleagues who have contributed to what has been achieved in a short space of time. We look forward to learning more as we continue with the remaining six months of the programme.

Pete Fahy, Director of Adult Services & Housing, Coventry City Council
Lead DASS – International Recruitment Programme

Background

In February 2022, care workers were added to the Shortage Occupation List and the Health and Care worker visa route. This meant that if international workers met the salary thresholds and had a licensed sponsor, they could be recruited to care worker roles in the UK.

The International Recruitment Fund provided by the Department of Health and Social Care (DHSC) was established to support adult social care providers to ethically recruit international care workers, to bolster the adult social care workforce. Funding of £15m was made available to ADASS Regions on a pilot basis in 2023/24 to help them develop solutions to local challenges around the use of international recruitment and to strengthen safeguards against exploitation.

Between March 2022 and March 2024 an estimated 185,000 people have started direct care providing roles in the independent sector, having arrived in the UK during that period (80,000 in 2022/23 and 105,000 in 2023/24). International recruitment within adult social care has contributed to the growth in the number of senior care worker and care worker filled posts in the workforce. This in turn has led to an overall increase in filled posts in adult social care in England and has contributed to turnover and vacancy rates decreasing (Skills For Care, 2024).

Unfortunately, there has been an increase in reports of un-ethical employment practices within the sector. The Department of Health and Social Care (DHSC) said they remained dedicated to continuing the use of international recruitment to bolster the adult social care workforce as well as enhancing efforts to ensure the ethical and sustainable employment of international recruits within the care system (Skills For Care, 2024).

In May 2024 DHSC made available £16 million to support regional partnerships to create strategies for preventing and addressing exploitative employment practices, while also supporting the continuity of care provision. For the West Midlands the grant was £1.84 million and DHSC published guidance on how partnerships should use the fund (Department of Health and Social Care , 2024).

Phase 1 of the West Midlands International Recruitment Programme has helped improve understanding of the main issues that international recruits are facing, hence the 24/25 grant is directed to support international care workers where their employer's sponsorship licence is revoked leaving them without employment (referred to as displaced) to find alternative, sustainable employment where possible.

WM-ADASS was allocated £1.84m (up from £1.62m in 23/24) on 28 May 2024. The grant has been paid through a Section 31 mechanism, with Shropshire Council acting as the lead local authority for the purposes of administering the grant.

The International Recruitment Programme is governed by a robust governance structure, ensuring clear roles and responsibilities. Accountability is to ADASS Branch of Directors, Shropshire Council and DHSC with clear monthly reporting in place. Partnership working with key stakeholders is achieved through a Partnership Steering Group comprising Local Authorities, Care Associations, Skills for Care, Delivery Partners and ADASS Programme Team members.

The focus on support for displaced international recruits is particularly important in the context that West Midlands now has an estimated 3,800 displaced international recruits. These are people who have lost their jobs due to revocation of their employers' sponsorship licence. This also presents a risk to social care market capacity and to the continuity of care for service users in affected organisations.

During 2023/24, West Midlands ADASS, worked in collaboration with partners across the region to develop an international recruitment infrastructure to support all providers with the administrative complexity, costs and challenges of international recruitment.

WM ADASS captured the learning about international recruitment in the adult social care sector as part of the 23/24 programme and published two Learning and Evaluation Reports in January 2024 (interim) and May 2024 ([final](#)).

Box 1 Learning from Phase 1

Extending Collaborative Working - was a key component e.g. Shropshire, Telford, and Wrekin work with Citizens Advice Bureau to support displaced international recruits.

Strengthening Community Assets - was evident in support to social care providers through the West Midlands Employers IR Hub, the legal and HR support, the webinars and the development of practical toolkits to support ethical recruitment.

Transforming Social Care Careers - was at the heart of the Solihull care providers work in recruiting international workers, with great examples of recruiting ethically, bringing high-level skills into the adult social care sector and significantly stabilising the care market.

Balancing Technology and Humanity - West Midlands worked with a technical innovation partner to create a digital prototype that would enable a self-support platform for international recruits.

Driving Change through Data and Evidence – The IR data hub was a critical component of the IR programme in the West Midlands. WM ADASS in collaboration with Shropshire Council used its existing regional database that was in place to support local authorities to gather intelligence on the use of International Recruitment across the Region. The nature of the care market meant that the intelligence needed to reach beyond the West Midlands Region to support other regions across England and central government departments.

Shifting the Narrative around adult social care – The International Recruitment programme has highlighted significant risks to the sector through unethical international recruitment. To shift the narrative, Coventry and Warwickshire demonstrated collaboration in excellent commissioning practice acting on early intelligence, working with the local care market and partners such as church and faith groups, to stabilise the market and coordinate new placements for displaced international recruits into ethical care employers with vacancies.

The learning was subsequently incorporated into the DHSC International Recruitment Fund programme aims for 24/25:

- Facilitating in-country matching of overseas recruits who have been displaced because of unethical employment practices.
- Partnerships with care alliances and other groupings including overseas recruits with

lived experience in the area.

- Delivery partnerships with care alliances and other stakeholders.
- Strengthening ethical employment practices in international recruitment and the employment of staff working in adult social care.
- Supporting approaches to prevent modern slavery.

Evaluation

This report is an interim Learning and Evaluation report for phase two of WM ADASS 2024/25 International Recruitment Programme. The report focuses on the development of a West Midlands International Recruitment Model, describing the different elements of the model and some of the early learning. The report also highlights potential application and translation of the learning from this complex programme of work to wider adult social care challenges that will be considered in more depth as part of the final evaluation report.

WM International Recruitment Objectives 24/25

The regional objectives for the International Recruitment (IR) programme 24/25 were developed in response to the national aims, building on the learning from phase 1 and the key pillars of support:

1.1: Continue to build, manage & maintain a regional ethical IR service offer with West Midlands Employers (WME).

1.2: Continue to develop and maintain a Regional Hub of IR Information, Advice and Guidance for Councils and Adult Social Care Providers with WME.

1.3: Provide regional support for displaced international care workers: Use discovery phase & national pilot learning to determine most sustainable and effective means for provision of regional mailbox solution for liaison with, signposting matching displaced international care workers to local authorities, specify, commission & develop employment business / agency solution.

- Provide practical support for displaced international care workers to help job finding e.g. CV support / pastoral support.
- Develop regional minimum standards for trusted sponsors and employment ensuring legal compliance.
- Establish different methods of communications & engagement with all & particularly displaced and international recruits.

1.4: Data management & data sharing compliance:

- Agree and implement data sharing agreements
- Expand IR power Business Intelligence (BI) database data set in line with GDPR & data sharing agreements.
- Support local authorities to maximise uptake and usage.
- Use dashboard regionally to identify trusted sponsors and providers' spare Certificates of Sponsorship (COS) once available.

1.5: Commission a communications partner working closely with West Midlands Care Association (WMCA) and care associations to develop a communication plan that ensures the regional offer is well understood and accessible to all

1.6: Commission an evaluation partner for an independent assessment of the programmes reach, impact and learning

1.7: Commission an Artificial Intelligence (AI) platform developer to establish sustainable communications with displaced as well as all international care workers

2.1: All local authorities to develop processes for job introductions / matching to providers using a local initiatives grant 2024/25

2.2: Pastoral support: Continued roll out of 23/24 buddying scheme prioritising re-employed displaced workers in first instance

2.3: Provider communications & engagement.

To achieve these objectives the programme team developed some principles to guide the development of the West Midlands model which are shown in Figure 1.

Figure 1. Principles for developing an International Recruitment model

How We Aim to Achieve Our Objectives



The programme team developed a high-level delivery plan for phase 2, with a focus on developing the regional model in Q1; and procuring delivery partners to support the model in Q2; Q3 is to focus on the learning and evaluation of the model as implementation progresses and to consider how the work can support wider adult social care workforce plans; Q4 will focus on the final evaluation of the model and the consideration of sustainable solutions for adult social care workforce planning and development. The programme has subsequently been extended by DHSC until 30th September 2025.



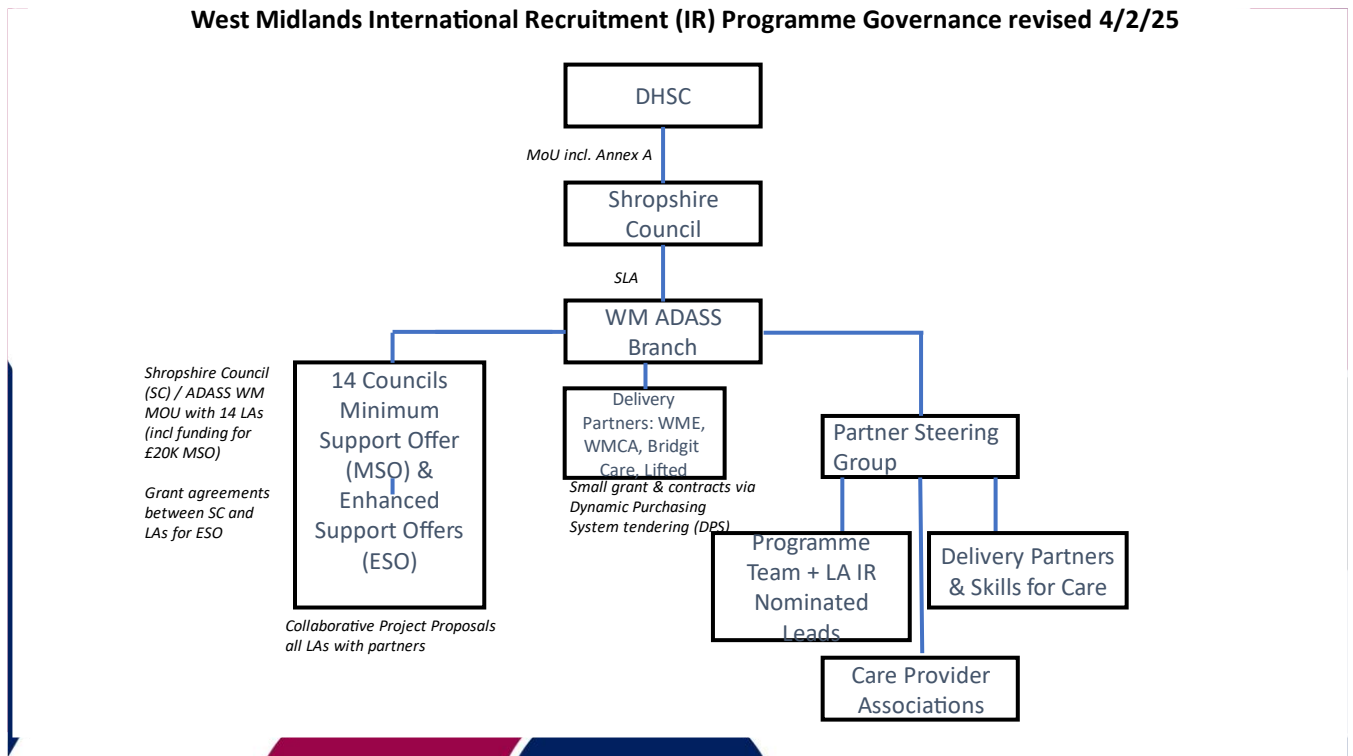
Programme Governance

West Midlands ADASS (WM ADASS) represents 14 directors running adult social care across West Midlands. The core purpose of West Midlands ADASS is to support improvement across the sector. WM ADASS already had good governance frameworks as the organisation is hosted by Shropshire Council governed through a Service Level Agreement. Financial Accountability is governed using a Memorandum of Understanding (MOU) between DHSC and WM ADASS. Shropshire Council agreed to act as the banker for the funding distribution for the Programme governed under a Service Level Agreement (SLA) between WM ADASS and Shropshire Council, and a memorandum of understanding between WM ADASS and 14 local authorities.

The International Recruitment programme team and the governance remained in place from phase 1 but was updated to reflect new partnerships (see figure 2) and was used to plan and develop the programme for phase 2. The established governance enabled timely decision-making and development of the model with all partners. Between May and August 2024, the

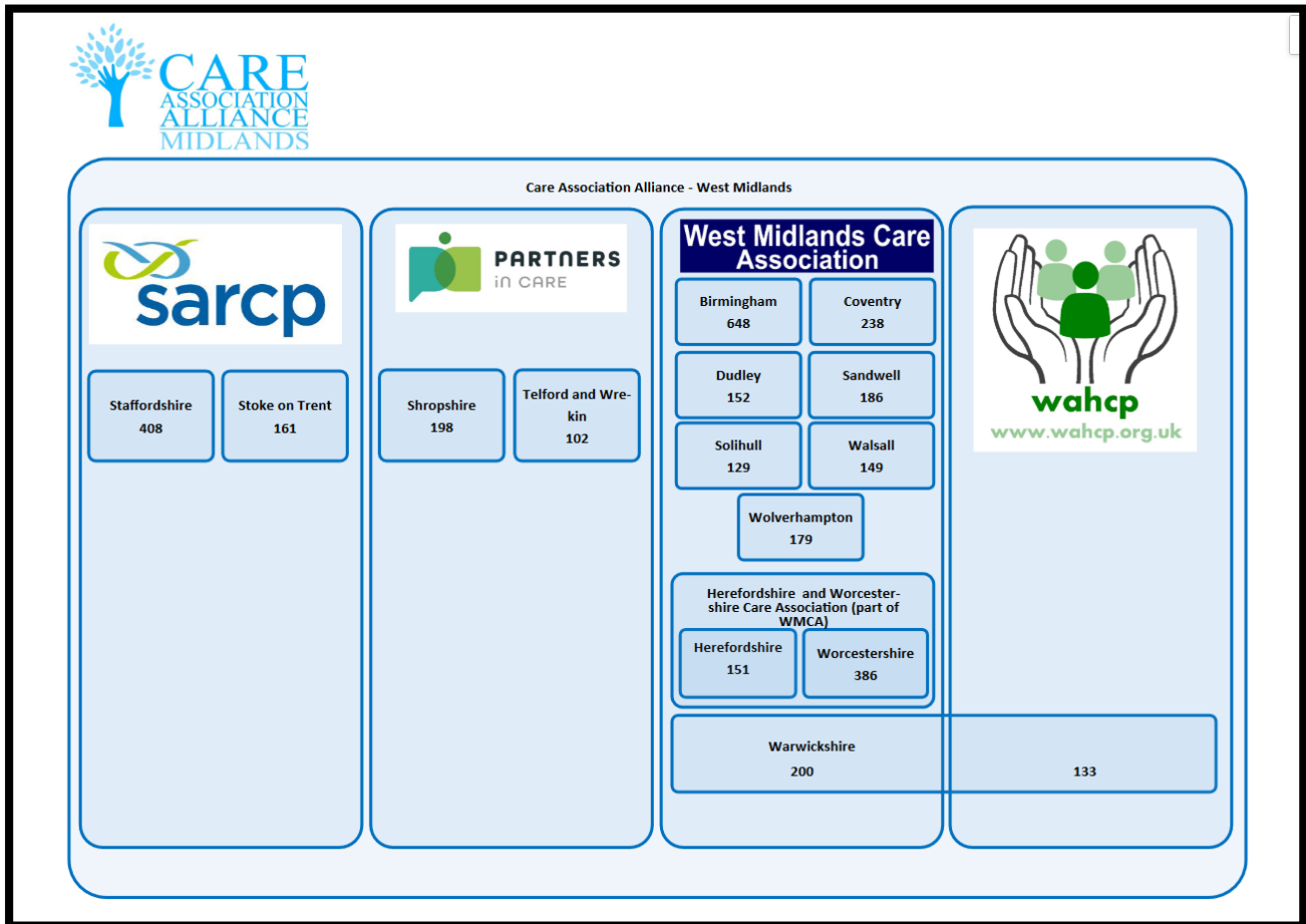
team were engaged in a pilot with DHSC and UKVI to test solutions to support international recruits that had been displaced from their original sponsors for employment in social care. The pilot is described later in the report and helped the programme team to define the challenge and develop a regional model to respond.

Figure 2. International Recruitment Governance



The Partnership Steering Group has been the collaborative forum to develop the model and listen to the issues and challenges for all partners. The Partnership Steering Group is accountable to WM ADASS Branch and is chaired by a lead Director of Adult Social Care (DASS), Pete Fahy, Director of Social Care and Housing, Coventry City Council. This has proved invaluable moving from phase 1 to phase 2, to listen to the challenges that local authorities are facing and how they can support the programme within statutory duties, particularly as the challenges of international recruitment in adult social care reach across government departments.

Figure 3 West Midlands Care Association Alliance Networks



The Care Association Alliance shown in figure 3 is an established network and infrastructure to communicate and engage with the adult social care market.

A working relationship between West Midlands Care Association (WMCA) and West Midlands Employers (WME) has already been established and is integral to the success of the centralised offering to the care associations. Working together with WME, WMCA is creating links for care associations with the WME/WM ADASS IR Hub, connecting the available regional resources including legal and HR advice and ensuring it is made available to care providers.

What was not apparent at the start of the programme was the number of care providers that are not members of any care association. Approximately one third of care providers are members of a local care association but the reach of the care associations is much greater than that as all care associations engage with the wider market on projects and networks, reaching over 70% of care providers. This created a need to explore additional communication channels to reach all care providers across the West Midlands. The collaboration between the Communication Lead and the WMCA has been crucial for the development of these new channels.

The complexity and scale of phase 2 created challenges for programme management. The appointment of a Lead Director to Chair the Partnership Steering Group and provide leadership

has been beneficial. The program operates a collaborative approach, with regular internal and partnership team meetings to support consensus-driven decision-making. The involvement of different team members with specific expertise (e.g., communications, safeguarding) and a redefining of roles has been beneficial for the programme's success.

The programme has benefited from having a clear distinction between the WM ADASS internal project team and delivery partners, which has helped in managing potential conflicts of interest whilst ensuring effective collaboration.

Defining the International Recruitment Challenge 24/25

Using the Double-Diamond planning approach, the programme team used the period between May and August to discuss and define the international recruitment challenge. This was to enable the development and delivery of a regional model that would respond to the challenge.

Since 2021, there has been an increase in the number of 'Health and Care Worker' visas growing sharply between September 2022-2023 following the expansion of the route in February 2022 to boost the social care workforce. There was evidence that international recruitment had stabilised the adult social care market, and vacancy rates had dropped. The West Midlands International Recruitment programme 23/24 had learned from care providers that there had been a significant impact, particularly as international workers tended to work full-time, and this had a knock-on effect in supporting domestic workers to be employed part-time, which was more attractive to domestic workers.

In December 2023, the Home Office announced policy changes, which came into effect at various points in 2024, most notably the change in allocation of visas which enabled international recruits to bring a dependent to the UK. This change had an impact and the number of 'Health and Care Worker' visas issued to main applicants fell April -June 2024 – down 81% compared with the same period in 2023. This change suggested that whilst there was a significant number of international workers in adult social care, the number of new international care workers would likely decline in response to the policy changes.

Care providers indicated concern that the policy changes could push care providers back to the post-pandemic problem of being unable to resource care packages.

Whilst a decline in new international care workers was becoming apparent in June 2024, the number of displaced international care workers was a concern. Discussion nationally focused on identifying and supporting displaced international care workers into alternative employment in the adult social care sector.

It was important to understand the scale of the challenge of displaced international care workers, and the suspension and revocation of care provider licences for international recruitment. Using the West Midlands International Recruitment Data Hub, it was identified that there are 2,274 CQC registered care providers in West Midlands and 37.6% were identified as international recruitment sponsors. In September 2024, the team noted that 27 West

Midland providers had had their sponsorship licences revoked in the previous 120 days, i.e. 1.1% providers representing approximately 1,700 international recruits. Since the 1st revocation in the region in July 2023, there were 40 providers who had their sponsorship licences revoked affecting approximately 4,895 international recruits by September 2024. This has risen to 57 revocations as of January 2025, although the number of recruits affected has been revised downwards, to around 3,900.

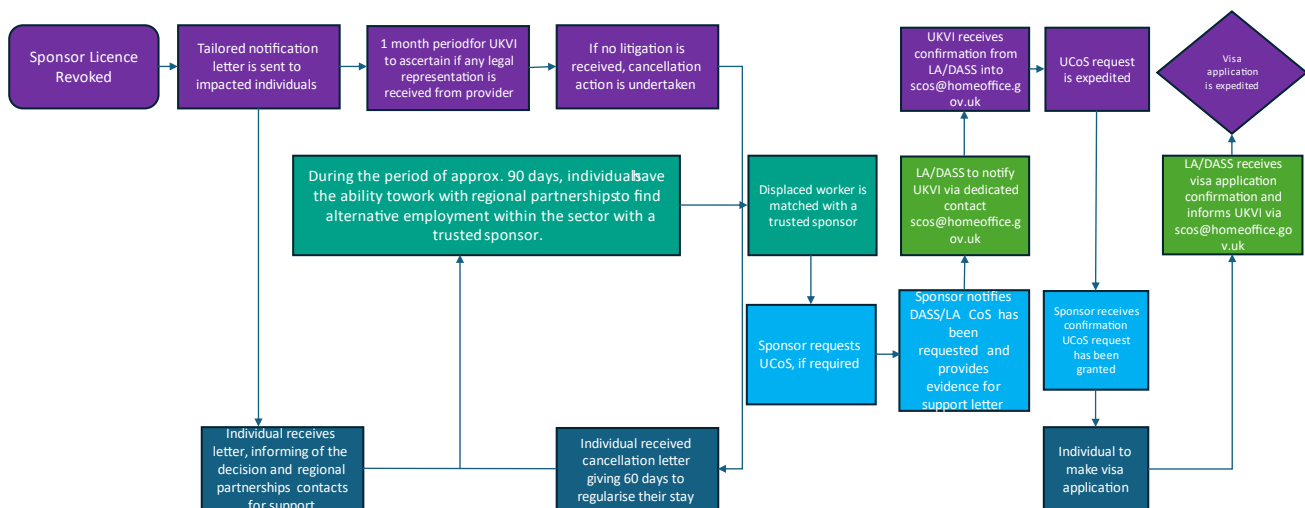
Within West Midlands, there were already examples of initiatives to identify and support displaced international care workers into new employment, and from these initiatives, a national pilot was developed with West Midlands to test an approach that could be rolled-out nationally.

Displaced Workers Pilot in the West Midlands May – July 2024

To support the 2024/25 International Recruitment Programme, West Midlands ADASS worked with DHSC and UK Visa and Immigration (UKVI) to pilot job matching support for international recruits impacted by sponsor licence revocation. The pilot began in May 2024 and covered international recruits from 2 providers in the West Midlands region whose licences had been revoked. WM ADASS conducted a national pilot of the proposed DHSC pathway and as a result the DHSC has made amendments to the proposed process.

Figure 4. Displaced Workers Pilot

Displaced Workers: Process Map



The key findings from the West Midlands pilot have subsequently been incorporated into 24/25 DHSC plans:

UKVI issued 760 notification emails to displaced international care workers as part of the pilot and from those West Midlands received 114 requests for support from international care workers. Almost half of enquiries were received within the first 2 days (56/114) with subsequent requests reduced to a small number per day.

In-region requests were largely from workers who were resident in the same area as the revoked sponsor and 40% of requests received were from people who do not live in the West Midlands.

It was necessary to seek explicit consent to share personal data with relevant parties (e.g., potential sponsors or where the recruit does not live in West Midlands to share their details with the correct regional hub). It was essential for regions to have data governance in place to manage and store personal data from international care workers. The learning from the pilot about the importance of data governance has been built into the West Midlands model for phase 2, and is discussed in more detail later in the report.

The pilot highlighted areas where processes could be automated to save capacity and reduce duplication. UKVI considered developing a portal where international care workers can submit their information as a medium-term solution, and some regions have developed their own portal.

The signposting of displaced international care workers to potential new employers must comply with employment legislation and the requirements for employment agencies, when developing a regional support model for international care workers. This was important learning and influenced the development of a region-wide job-matching service commissioned from a specialist recruitment service, which is described later in the report.

In addition to the work on the pilot, West Midlands successfully used the DASS supporting information letter (see appendix 1) to secure 5 additional Certificates of Sponsorship (CoS). In this instance it took the DASS 3 days to ascertain the information that they needed from the provider to complete the supporting information, and the approval for the CoS was turned around by UKVI in less than 24 hours. This learning has been developed within the WM phase 2 model.

Development of the West Midlands International Recruitment Model

The key pillars from phase 1 were considered a critical part for the development of a phase 2 International Recruitment model:

- International recruitment collaboration between WM ADASS; WM Employers; 14 Local Authorities; West Midlands Care Association Alliance; and Skills for Care.

- International recruitment regional HR and legal hub.
- International recruitment data hub showing provider with sponsorship licences regional database.
- Prototype for AI digital self-support for international care workers.
- Local initiatives and collaborations to respond to challenges for adult social care sector.

The challenge for the design of a new model was how to effectively support displaced international care workers to find alternative, sustainable employment where possible while not knowing who or where they were as only UKVI had this information.

The scale of the challenge was evident from the intelligence the region had from the IR data hub and UKVI and the experience of running the pilot for the DHSC/UKVI displaced workers' process.

The Programme Model was built from a review of what was in place at a regional and local authority level. The IR Legal and HR hub, the IR data hub, the programme office, continuing collaborations with partners, a digital prototype for self-serve support, and innovative support from some local authorities that remained in place from phase 1.

Local Authority Early Engagement and Delivery

Local authorities had significant learning from phase 1 and some local authorities had been able to maintain their local offer with the grant from 23/24. This was helpful as the pilot of the new displaced worker process was carried out, enabling discussion and learning with the local delivery partners.

To ensure early development for phase 2, a process for the distribution of grant funding to local authorities was developed and supported by the WM ADASS Branch of Directors. This was arranged in 2 grants, the 1st as a minimum support offer for all 14 local authorities to meet the new DHSC displaced worker process criteria.

Each local authority was allocated £20k for the minimum offer of support to establish a local authority International Recruitment Lead to co-ordinate actions and engagement with the programme, and to receive and record support requests from displaced and at risk international care workers.

The 2nd grant distribution for local authorities was optional and was to develop local enhanced support offers for international recruitment. To guide the development of the offers, local authority partners worked together with the Learning and Evaluation Lead to develop a guide for good practice to respond to the challenges for international recruitment. A draft good practice guide was developed from this learning and combined with the guidance produced by the Local Government Association (see appendix 3). This draft good practice guide will be developed further through phase 2 and will feature in the final evaluation and learning report as a practical toolkit for local authorities.

Ten of the 14 local authorities have developed local enhanced offers, providing a range of services suggested in the good practice guide:

- Mapping local social care provider market.
- Local co-ordinated response to suspensions/revocations of licences.
- Creating a local database of international care workers.
- Making connections with local faith groups, community groups, and other agencies to identify international care workers at risk and offer support.
- Providing signposting to information and support about employment, rights, and access to local and national support.
- Support for children & families of international care workers at risk.
- Collaboration with quality assurance teams to include risk assessment of all care providers with international care workers.
- Regular communication with all care providers (commissioned and non-commissioned).
- Response to modern slavery.

At this stage of the 24/25 programme, the local authority enhanced offers are at different stages of implementation. The progress will be evaluated in the final evaluation report in autumn 2025, and here we share insight into the good practice that is being developed across local authorities:

Coventry and Warwickshire had both developed significant support for care providers and international care workers during phase 1 and this continued into phase 2, providing an opportunity to engage and support the DHSC/UKVI pilot process for displaced workers. Coventry and Warwickshire work closely together because of the high number of care providers that support both areas.

In phase 2, **Coventry** has produced an e-bulletin which describes the international recruitment support offer and signposts to support services, such as the new Lifted Sponsors switch app, which is an online service commissioned for the region, to enable displaced international care workers to be introduced to potential new care provider sponsors in the region. The Coventry initiative includes support from their local migration rights service Tulia. The link to the bulletin is attached below.

Coventry International Recruitment E Bulletin

Warwickshire has developed a bespoke English language training programme for international care workers. The programme focuses on medical and social care terminology as well as British culture, values and ways of living. The courses have been fully subscribed and have had excellent reviews. The aim is to improve the quality of support and prevent breakdown of employment relations. Warwickshire has also developed a decision support tool for risk assessment of care providers with international recruits.

Walsall had not been involved in phase 1 and was keen to learn from other areas. Walsall has developed an International Recruitment Response Team, a partnership team of adult social care, children's services, local NHS colleagues, to assess risk, and manage suspensions and revocations effectively. The team provide support to providers and international care workers at risk or displaced.

Staffordshire has developed its own web page and signposting services for care providers and international care workers. The link is attached below. Staffordshire has developed an effective local quality tracker that is connected to the WM ADASS IR dashboard to identify a live list of local care provider sponsors and their licence status. Staffordshire has a displaced international care worker register in place and has supported some displaced international care workers through this process.

Staffordshire International Recruitment Support Information

Shropshire, and Telford & Wrekin have built on the good practice developed in phase 1, in their work with Citizens Advice Bureau (CAB) and Partners in Care – the Shropshire, Telford & Wrekin care provider association. Early intelligence from phase 1 indicated that displaced international care workers were less likely to engage with statutory agencies for support due to fear and anxiety about their immigration status. Shropshire, Telford & Wrekin have developed a support service with CAB to identify and support displaced international care workers into new employment. This was successful in phase 1 and has continued to be the offer for phase 2.

Sandwell was instrumental in developing learning and understanding of the potential safeguarding and vulnerability of international care workers to modern slavery in phase 1. This has led to the 24/25 programme engaging a dedicated safeguarding advisor for the programme.

Sandwell has created a dedicated post to support adult social care with modern slavery and safeguarding displaced international care workers. In the last 18 months Sandwell dealt with over 100 displaced workers and successfully safeguarded several individuals through the national referral mechanism and achieved positive reasonable grounds decisions for them. Sandwell was also successful in gathering intelligence to move a case forward where a local care agency had sponsored 191 international recruits and had not provided work for most of them, had charged money for the provision of a certification of sponsorship (COS) letter and visa. Sandwell is now working with the relevant agencies to bring this to justice. This post and project will be a significant contribution for local and national learning.

The programme team conducted a survey of partners in June 2024 to shape the 2024–25 Model. Respondents highlighted the usefulness of webinars and the legal helpline and > 50% requested continued legal or HR support. 25% sought ongoing financial support for international recruitment; 17% requested training, including language classes, care-specific skills, and cultural awareness; 16% emphasised the need for assistance with accommodation and pastoral care for international recruits. One of the main concerns was the delay in visa and Certificate of Sponsorship and a request for these to be expedited. These priorities have been incorporated into the programme's design to ensure relevance and effectiveness.

Regional support for Sponsors/Care Providers

Using the principle of subsidiarity and responding to the requirements of the care providers, the region has commissioned legal and HR support including guidance on sponsorship compliance, webinars and helplines. Recruitment and facilitation has been commissioned to support care providers with funding DBS checks, provide a regional mailbox to receive notifications from UKVI about displaced international care workers, to engage with all care providers and identify potential new sponsors for displaced international recruits, and commissioned a Sponsorswitch service to connect sponsors and displaced international recruits.

This is in addition to the range of local authority support being developed through the enhanced offers. For local authorities that were unable to offer enhanced support offers, regional support is in place for access by all local authorities and care providers. Figure 5 provides an illustration of the support in place.

Figure 5. Regional Support for Care Providers

Regional Support for Care Providers



Regional Support for Displaced International Care Workers

Support for international care workers in phase 1 was focused on pastoral support, training and buddying services, and local authority initiatives. Phase 2 model needed to develop bespoke support for displaced international care workers. The regional mailbox pilot has been developed and commissioned for phase 2 and enables UKVI to send displaced international care workers to the regional mailbox and for the regional mailbox team to correspond with the workers to gain consent for ongoing signposting and support. The support may include assessment of work readiness, signposting to local authorities, pastoral support, safeguarding, training and buddying, legal and HR support, a regionally commissioned self-service platform (My UK Life) as well as to a regionally commissioned job matching (Sponsorswitch) service. Figure 6 illustrates the regional support offered.

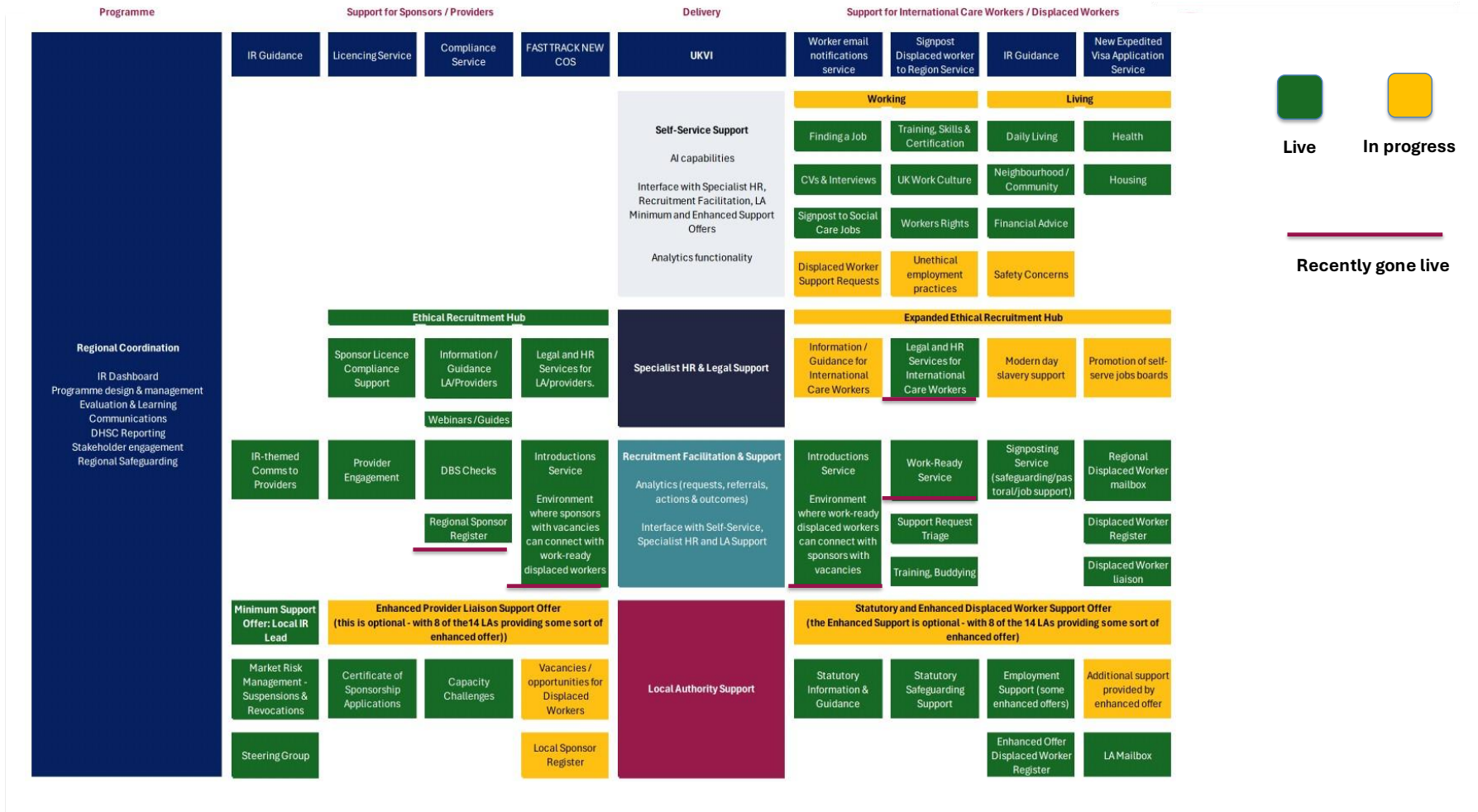
Figure 6. Regional Support for Displaced International Care Workers

Regional Support for International Care Workers



Drawing all the regional and local international recruitment support together, the new West Midlands International Recruitment model is shown in Figure 7. The model is subject to a formal change management process and the green and amber colour-coding is used to monitor as each element is in development or goes live. Figure 7 shows the development position in January 2025.

Figure 7. WM International Recruitment Model (January 2025)



My UK LIFE – Digital Self-Serve Platform for International Care Workers

My UK Life, the self-service digital support platform for international care workers has been commissioned and has gone live from December 2024. The link below takes you to the portal which will guide you through the process.

[Home – WMADASS – My UK Life](#)

My UK Life is an AI-driven platform designed to support international care workers by providing personalised coaching and guidance in various areas such as employment, social care, health, finances, family, housing, and community. The platform offers support in creating CVs, understanding healthcare rights, and accessing various services. It also includes features like chat conversations with AI coaches and document reviews. It is available in all languages and is being enhanced to include local offers and support, allowing international care workers to see specific support available in their chosen area. The platform tracks keywords from user interactions to better understand their needs and tailor support accordingly.

The platform provides detailed analytics on user engagement, including the number of international care workers, their locations, and the types of support they seek. The platform has seen a significant increase in user engagement, with a notable spike in new care workers joining in December and January.

Analytics include the locations of care workers, allowing for a breakdown of where users are coming from and their specific needs based on their region. The platform tracks the categories of support that users are seeking, such as employment, social care, health, finances, family, housing, and community. Employment and social care are the most sought-after categories. In January, the platform had facilitated 390 chat conversations and reviewed 28 documents, providing personalised advice and support to users.

LIFTED

Lifted is a technology platform and team of experts providing immigration advice to help care providers recruit and retain displaced international care workers ethically, compliantly, and sustainably.

The LIFTED platform includes a landing page with support available, including the development of links to local authority offers, legal helpline details, and employment support. This aims to centralise the support offer and make it easier for candidates to access the necessary resources. The platform will also have a chatbot system to assist candidates with specific needs, such as legal advice or safeguarding concerns.

The connection to Sponsorswitch is given in the link below:

Signposting displaced international care workers to Lifted: www.sponsorswitch.com/carers

The service for international care workers includes:

Application: Workers apply for roles via the Lifted app, which uses an AI algorithm to match them with ethical care providers.

Support: Includes securing new visas, completing compliance, organising housing and relocation, and transferring driving licenses.

Personal Support: Dedicated talent advocate, one-to-one support, and ongoing pastoral support, including a well-being and cost-of-living program.

Financial Assistance: Interest-free loans for visa fees, housing deposits, and driving lessons.

The service for care providers includes:

Ethical Standards: Providers must commit to ethical standards of sponsorship.

Free Services: Includes free sponsorship license applications and paying Home Office fees upfront.

Compliance: Lifted handles all immigration compliance and ongoing compliance tracking.

Cost: Charges £199 per worker placed, with additional support funded by the West Midlands ADASS program, including free sponsorship license applications and a £600 per worker placement fee to care providers.

The job matching process includes:

- Work ready Assessment
- Role suitability check
- English language check
- Location match
- Out of area match

A dashboard has been developed to track the progress of displaced workers. This dashboard includes metrics such as the number of applicants, their status (displaced or not), and other relevant data points like driving status and gender. The dashboard is designed to be accessible with a password and will not display individual data to comply with GDPR.

The Lifted service has been used by a local care provider who was impressed by the efficiency and quality of the service, stating that it had saved significant time and stress managing the renewal of Certificates of Sponsorship (CoS) and compliance checks with both the Home Office and CQC. Overall, the experience was positive resulting in a successful placement of a displaced international care worker with a new employer and sponsor.

WM Displaced International Recruits Regional Mailbox & Support

The regional displaced international care workers mailbox went live on 1st November 2024. Workers are required to register for support via www.revoked.support.

Both DHSC and UKVI have been keen to expand access to the regional mailbox as quickly as possible as a way of ensuring that those affected by revocations are able to request support close to home and in a timely manner. WM developed an expansion plan, aligned with the availability of key components within the service model, and began to receive requests for support associated with revocations in early November 2024.

Initially WM proposed a cautious approach to mailbox expansion to minimise the risk of demand overwhelming support capacity. The initial plan was for all displaced care workers associated with West Midlands-based sponsors whose licence had been revoked by 31st December 2024 would be invited to request support from the regional mailbox by end February 2025. However, through a combination of reduced numbers of in-scope workers and lower than expected demand from displaced international care workers, the expansion plan was accelerated.

By 31st December 2024, access to the regional mailbox had been signposted to 3,700 workers who are associated with the 52 West Midlands-based sponsors who had their licences revoked prior to 31st October 2024. This is around 20% lower than expected- mainly due to break in contact between UKVI and some workers.

All future affected care workers will be invited to request support at the expiry of two months following the date of revocation, with a further 279 workers from 5 newly-revoked sponsors already scheduled to be contacted in early 2025.

By 9th January 2025, 519 displaced international care workers have contacted the regional mailbox requesting support. 110 of these requests came from displaced care workers living in other regions and have been referred to the appropriate region for support. On average the mailbox receives 10 requests for support per day.

The regional mailbox team is also providing assessment of displaced international care workers suitability for care work, and early intelligence is highlighting lack of readiness for approximately 75% displaced international care workers making contact.

The IR Programme Team are collating intelligence to understand the reasons for lack of readiness for care work. The main reason is the holding of UK driving license and access to a car, which is required for care at home providers.

The development of the self-serve My UK Life and LIFTED digital platform services provide onward advice and support for displaced international care workers to improve their work readiness for placement with a new care provider.

The monitoring of the intelligence from all services contributing to the West Midlands IR model over the next 6 months will provide valuable insight into the tailoring of support needed and the scale of support needed. This will enable the region to plan a sustainable international recruitment support model.

A phased launch plan for the WM IR Model was required to coincide with when delivery partners had gone through the procurement process and support was 'live'. The timeline was as follows:

September 2024: Introduced enhanced funding information to local authorities.

November 2024 : Launched updates on speeding up Certificates of Sponsorship, mailbox expansion plans.

December 2024: Hosted the first Legal & HR webinar and streamlined processes to improve participation.

December 2024: My UK LIFE goes live

January 2025: Planned go-live for updated IR Social Care Hub and expanded HR & Legal Support for Displaced International Care Workers.

January 2025: LIFTED goes live

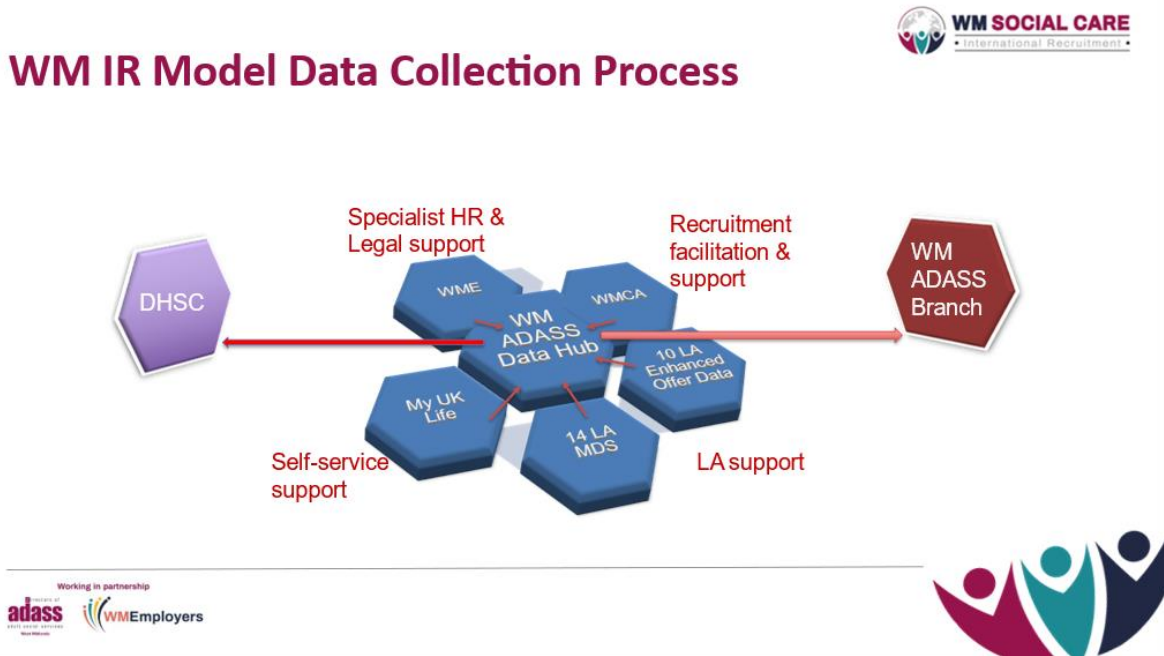
Driving Change through Data and Evidence

WM ADASS has a track record of developing intelligence to support local authorities e.g. CQC readiness. This work has been built upon during phase 1 of the International Recruitment programme to respond to the local authorities requests to better understand the emerging risks to international recruits and agency suppliers and care providers. Strengthening data capabilities for international recruitment provides intelligence to inform service planning, workforce development and prevention activities, and support a focus on reducing inequalities; ensuring data to inform action is complemented by robust evidence around what works, when and for whom.

For phase 2 the DHSC has requested monthly and quarterly data submissions to track progress of the International Recruitment programme 24/25.

WM ADASS has established a data hub for submission of data by all partners as shown in figure 8.

Figure 8.



The progress to date is shown in figure 9, the Q2 (Oct- Dec 24) DHSC data submission.

Figure 9. DHSC Q2 Return

DHSC Q2 (Oct- end Dec '24) Return

WM SOCIAL CARE
International Recruitment

<p style="text-align: center;">Demand</p> <ul style="list-style-type: none"> - 277 resulting from UKVI emails - 163 signposted from other regions - 37 referred from other source (inc. pre-revocation) 	<p style="text-align: center;">Activity</p> <ul style="list-style-type: none"> - 260 signposted to My UK Life / Lifted - 1 signposted for legal/HR advice - 90 signposted to LAs for enhanced support - 90 referred onto 'home' region
<p style="text-align: center;">Sponsors</p> <ul style="list-style-type: none"> - 30 providers interested in supporting matched workers - 119 providers accessed training - 31 providers accessed support or advice 	<p style="text-align: center;">Outcomes</p> <ul style="list-style-type: none"> - 9 people supported into new employment - 10 cases closed as NFA - 88 cases closed on referral to other region - 340 Active cases

adass
adult social services
West Midlands

With the additional services added to the model over this period, new data will be available for Q3 and Q4 that will give better insight into the needs of displaced international care workers and care providers.

In addition to the quantitative data collected, qualitative data on the experiences of care providers and international care workers will also be collected through the development of case studies for the final evaluation and learning report.

Equally the learning from the implementation of local authority support offers will add value to the learning and evaluation for the whole programme.

The IR Leads have developed a peer learning and support group that meets monthly and enables shared learning and solution development for challenges that arise.

The group have discussed suspensions and revocations of care providers and how they have responded locally, through risk assessment tools, and development of local databases. The group highlighted the challenge of finding employment for international care workers without UK driving licenses, as many vacancies require driving. A survey of international care workers indicated significant delays in accessing the driving tests.

Data Protection Learning

The engagement of WM ADASS in the national displaced international care workers pilot highlighted the risks associated with the handling of data in the development of the international recruitment model. Support from Shropshire County Council legal services, as the host for WM ADASS indicated that GDPR was a significant risk.

A Data Protection Impact Assessment (DPIA) has been developed to ensure the correct handling and processing of data across the programme and strengthen WM ADASS due diligence with the processing of information undertaken by its key delivery partners.

A key learning point for the programme was that a dedicated data protection expert would have streamlined the process and established clear boundaries and responsibilities for data protection at an earlier stage.

Safeguarding

Safeguarding means ‘..... protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect’ (Care and Support Statutory Guidance, September 2024).

Phase 2 of the International Recruitment programme has safeguarding as a key principle, particularly as phase 2 focuses on individuals who have been displaced from their employment with a care provider who has had their sponsorship licence revoked or suspended. Phase 1 of the WM International Recruitment programme highlighted the risks and vulnerabilities for international recruits to exploitation and unethical recruitment practice, and the potential need to safeguard individuals. Sandwell Council had worked hard on guidance for supporting displaced international recruits who may have been subject to modern slavery and have an enhanced offer in place to further develop support and guidance that will have application locally and nationally.

A decision was made early in phase 2 to employ a specialist safeguarding lead to the programme to advise on safeguarding in the development of the West Midlands International Recruitment Model. This has proved invaluable and has been instrumental in supporting local authority IR leads in building connections with existing safeguarding processes and networks to respond to challenges that they identify through risk assessment of care providers and international recruitment.

The safeguarding advice has supported the following:

Escalation of Safeguarding Concerns: There is a need to ensure that safeguarding concerns raised through the displaced recruits regional helpline are escalated to the appropriate local authority and monitored by the team for awareness and tracking.

Consistency in Signposting: Ensuring that local authorities are aware of the process to signpost displaced workers to the helpline through the regional mailbox system, maintaining a single gateway for all support requests. This helps in tracking and managing safeguarding issues consistently.

Data Collection for Monitoring: Collecting data on the number of queries to the helpline, including safeguarding concerns, to monitor the situation and ensure appropriate follow-up actions are taken.

Robust links between the programme and the West Midlands Safeguarding Leads group. The West Midlands Regional Safeguarding lead has been identified as a point of contact for the programme delivery partners to advise and support signposting to the appropriate agency for a response. This is a temporary arrangement to support developing a clear reporting framework for all to follow.

Local authority IR leads have been asked to identify their named safeguarding leads and clarify their referral routes for concerns about international care workers (including child safeguarding concerns) .

Work has been undertaken to expand the information provided to international care workers using the artificial intelligence platform My UK Life.

Communications & Engagement

Important learning from 23/24 was to put regional communications and engagement in place for the programme from the start of phase 2.

The communications and engagement strategy has been pivotal in launching the WM-ADASS International Recruitment programme and fostering collaboration among stakeholders. By leveraging multiple channels, tailoring messages to the audience, and responding to stakeholder feedback, the strategy is supporting the programme's phased activities effectively.

Key Activities and Outcomes

Engage Existing Events and Networks

Recognising the time constraints of care providers and the challenges of reaching displaced workers, the programme effectively utilises existing care provider meetings, newsletters and community events to disseminate information and foster engagement. This includes weekly updates to care providers via their care association's weekly newsletters.

Regional and Local Launch Events (Online)

Regional International Recruitment model has been presented at 5 local online events. Published material has also been provided for the Staffordshire Care Providers Conference, at which the local team were able to discuss IR issues with providers. This helped signpost care providers to the resources and support available and captured feedback to support the continued development and improvement of the programme.

A WM regional-wide virtual launch event is planned to introduce care providers to the job matching partnership, regional support resources, and opportunities for engagement. Additional virtual events targeting local authorities with enhanced support offers are also held, ensuring broad participation.

Resource Distribution

Informational materials outlining the Regional Model and available support are distributed to care providers and local authorities to share with community organisations, including Citizens Advice Bureau, Job Centres, and charities.

Webinar Success

The revised communications strategy, including simplified sign-up processes for webinars contributed to the success of the first Legal & HR webinar in December and reduced the administrative burden on the team. 93 care providers and IR Leads attended live, and 124 had accessed the recording (data recorded on the 6th January) There was positive participant feedback (4.9/5 satisfaction) and highlighted increased clarity on e-Visas and the regional model.

Timely and Consistent Messaging

A regular IR Bulletin, launched in December/January, provided updates on the support available for care providers and displaced international care workers. This issue included information about the expedited CoS process, legal guidance, e-Visa insights and it shared good practice.

IR Legal and HR Hub: Improved Accessibility and Navigation

A review of the IR Legal and HR Hub was completed in November and suggested changes to ensure stakeholders could easily access relevant information. There will be a section for Local Authorities, International Care Workers and Care Providers. The phased rollout of enhanced pages is on track for completion by the end of January 2025.

Summary and Next Steps in Learning & Evaluation

The development of phase 2 of the WM International Recruitment programme has been busy and productive. The need to identify and support international care workers who had been displaced from sponsor organisations has been the key focus. Working with the national pilot, WM ADASS was able to assist the development of a national model to connect UKVI referrals of displaced workers with regions and local authorities. This experience also helped in the development of the WM International Recruitment model set out in Figure 9, designed to provide support to care providers and displaced international care workers at regional and local levels.

This interim learning and evaluation report describes the development of the WM International Recruitment model and the implementation of the commissioned services to reflect that model. Learning from phase 1, the programme this year was successful in engaging local authorities at an earlier stage and developing minimum support offers across all 14 local authorities. This ensured each local authority had an International Recruitment Lead that could engage with the programme to develop the WM model.

The principle of subsidiarity continued from phase 1 and the model reflected regional support that was beneficial at scale whilst encouraging and enabling the development of local enhanced offers. Ten local authorities are providing local enhanced offers to support International Recruitment, with some great examples of good practice detailed in this report, and important interventions for safeguarding and modern slavery that will have local and national application. The local authority leaders are actively working together to share good practice and learn from each other, making sure their work is coordinated with the regional support offers.

There are emerging themes coming through this year's international recruitment programme that will be followed over the next 6 months to include within the final evaluation report.

Driving Licences for Care Workers The requirement by many social care providers for carers to be able to drive and have access to a vehicle for work. The programme team are looking at options to support carers to access alternative flexible and safe transport options, because of the significant delay in accessing driving tests currently, and the significant costs for purchasing and insuring a car.

Quality Assurance Local authorities are developing quality assurance checks and decision support tools to assess social care provider risk in relation to international recruitment. This intervention has the potential to identify and support care providers before they breach regulations. It will be interesting to review this approach over the next 6 months.

International Care Workers Health Issues The work has identified health issues that are emerging for some international care workers and their families. This may not be significant compared to the domestic workforce but is a theme to review particularly if there are patterns relating to specific conditions. There are potential implications for improving health screening on recruitment.

Impact of Policy Changes International recruitment has reduced vacancies and turnover in adult social care. The Skills for Care 2024 report indicates a more stable workforce, however, changes in policy from January 2024 may reduce future impact. Care providers have advised that senior care workers have achieved their PIN status in nursing and social care will need to encourage these skilled senior care workers to stay within social care. It will be interesting to note patterns in the workforce over the next 6 months.

NI/ National minimum wage impacts Linked to the above, we are also picking up market intelligence about National Insurance and National Minimum Wage increases potentially impacting adult social care provider recruitment. This could impact demand for employing international care workers in future.

AI The introduction of AI platforms into the model to enable self-serve support for displaced international care workers will provide insight into the profile and needs of international care workers and will enable planning on a sustainable basis. The introduction of an AI platform to support work readiness and matching displaced international care workers with potential care providers will provide learning of the application of this approach to wider social care recruitment and retention challenges for the adult social care sector.

Partnerships & Collaboration WM ADASS has a well-developed group of professional and population/service networks that are supported to share good practice and professional support across the region. There are improvement projects that are led by WM ADASS on behalf of and with local authorities. The International Recruitment programme has grappled with some new approaches and challenges, new relationships at local, regional and national level. There is much to be learned from this approach that may be of interest to existing networks and other innovation projects, e.g. data governance; using partners to deliver self-service digital platforms; development of intelligence hubs.

This year the programme has seen the further development of partnerships with West Midlands Care Association, and other care associations in the region, and with West Midlands Employers. These are pivotal organisations that have existing relationships with 14 local authorities in West Midlands and with WM ADASS. The connections with adult social care providers, who are largely SME's is significant. As the evaluation moves into the next 6 months, there will be merit in reviewing the potential of these developing collaborations for tackling wider social care challenges, e.g. workforce, social care market resilience and sustainability; and opportunities of applying elements of the regional model to those wider challenges e.g. legal and HR hub.

Appendices

Appendix 1: DHSC Guidance for local authorities support for Certificate of Sponsorship

DHSC Guidance

Directors of Adult Social Services supporting UKVI assessment of care sector Certificate of Sponsorship (COS) applications.

This document outlines the process through which Directors of Adult Social Services can provide additional information to UKVI to support certificate of sponsorship applications submitted by adult social care providers in their area.

This additional level of assurance has been developed in collaboration with the Department of Health and Social Care, the Home Office, UKVI, and ADASS. It is designed to facilitate applications for undefined certificates of sponsorship in instances where international recruits have been affected by a sponsorship licence revocation and need to be supported into alternative, appropriate employment within the sector.

This process is part of a wider package of support for international recruits who've been affected by licence revocations. See Appendix i for details.

When a sponsor has had their licence revoked, UKVI will notify international recruits currently under their employment. This notification will be sent via email and will provide contacts for the international recruitment fund regional leads who will be able to support individuals looking to find new employment in the care sector. International recruits will then be able to contact the fund leads, who will facilitate jobs matching with new employers where appropriate.

Once a displaced worker has been matched with a trusted provider, that provider will then notify the appropriate DASS and ask for a letter of support for their certificate of sponsorship application. In order to assess the providers application, the DASS may wish to use the checklist below to complete the DASS letter of support (if deemed appropriate).

Once DASSs are content to submit a letter of support to UKVI, they will send this letter to the following inbox: scos@homeoffice.gov.uk. UKVI will then expedite applications submitted by providers that match to the letters of support received.

It is important to note that the supporting information submitted by DASSs presents a view, not an endorsement, of any application, and it is intended to aid UKVI to make the final decision.

DASS Letter of Support Suggestion

LA:

DASS name:

Provider details:

Sponsor name (if different from provider name):

COS request details: e.g. 10x 6145 carer @ 37 hours per week

Date:

1. Does the Local Authority currently hold a contract/s with the organisation?
2. If yes, is the contract information provided by the organisation in their application consistent with your own understanding of the contracts you hold with them? y / n
3. Is any of the contract information provided by the organisation with the Local Authority a block contract which guarantees work? Y/N
4. To the best of your knowledge and belief based upon the information provided are the numbers of COS requested by the organisation reasonable given:
 - a) The number of people that the provider supports Y/N
 - b) The number of staff that the provider currently employs Y/N
5. (Free text box for additional information) Is the LA aware of any additional relevant information about the provider which may impact upon their application (e.g. placement suspension / safeguarding concerns / levels of complaints)?

“We confirm that the information we have provided is accurate to the best of our knowledge and belief and is based upon information provided to us (which does not include personal data about individual immigration status) together with our understanding of the local market. We are aware that this information may be used by the UKVI to support them in discharging their duties and responsibilities in determining the application received by them.”

If the DASS is content with providing the information above, they will then send the letter of support to UKVI via the dedicated contact: scos@homeoffice.gov.uk.

Provider information

As part of this process, the DASS may ask the ASC sponsor to provide them with the evidence that they have submitted to UKVI. Additional information that the DASS may require from sponsors in order to make an assessment if applications are reasonable are as follows:

Provider details:

Sponsor name:

COS request details: e.g. 10x 6145 carer @ 37 hours per week

Date:

Questions 1 -3 help to build a picture about the size and structure of the provider

- 1) On average over the past 12/24 months, how many individuals have you supported per week?
- 2) On average over the past 12/24 months, how many hours of care have you provided per week?
- 3) How many care workers (FTE) do you currently employ? How many (FTE) have you employed on average during the last 12 / 24 months? If there are significant changes between years, please explain the reasons for this (e.g. taking over a service, staff TUPE, service expansion, etc.)

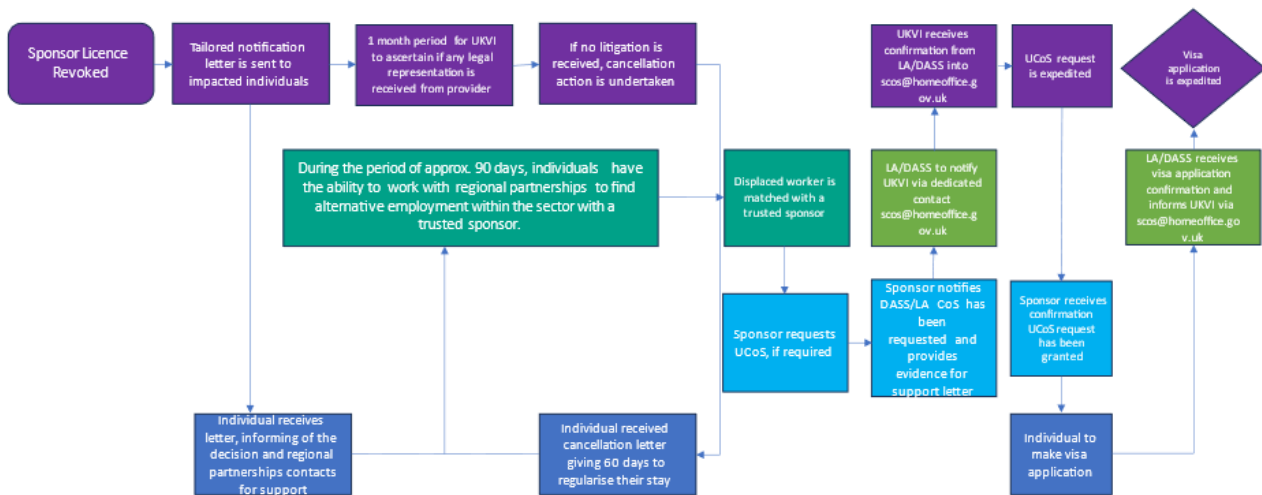
Questions 4 – 9 help to build a picture about the flow of work into the provider

- 4) If you currently have a contract/s in place with X Local Authority or the NHS, what is the form of the contract (i.e. block or spot purchased, framework, etc.) and how long have contracts been in place/have left to run?
- 5) What percentage of your care workforce are, or have been, recruited via agencies over the past 12 / 24 months?
- 6) What is your current care staff turnover rate?
- 7) What percentage of your current care workforce (FTE), and of your care workforce (FTE) over the past 12/24 months, are or were international recruits with a health and care visa?
- 8) How long have you been registered with CQC and what is your current rating (please state if not yet rated)?
- 9) (Free text, limited to 200 words) Please indicate all previous experience of international recruitment (all roles) in your organisation (i.e. numbers of staff recruited / roles recruited to / yrs experience of international recruitment etc.). What support does your organisation offer to new international recruits (e.g. pastoral support, advice, accommodation, driving lessons)?

Displaced Worker Support Process - Draft

Displaced Workers: Process Map

SHARED IN CONFIDENCE: OFFICIAL-SENSITIVE



Department of Health & Social Care

UKVI

LA/DASS

Regional partnership

DASS/LA Trusted Sponsor

Displaced Worker

Appendix 2: Draft West Midlands Good Practice Guide for Local Authorities International Recruitment

Good Practice Guide for Local Authorities on International Recruitment

12th September 2024

These are some headings based upon learning from some of the West Midlands local authorities that may help inform Local Authorities' thinking on development of local proposals to support displaced international recruits.

Local authorities have responsibilities that are applicable to International Recruitment:

- safeguarding under the Care Act
- market shaping, commissioning, contract management and quality assurance
- working collaboratively with providers and local partnerships

This draft guide references to the *Local Government Association Guide to Good Practice for International Recruitment* and is applicable whether the support offer be the minimum or a more enhanced offer.

1. Mapping Social Care Provider Market for International Recruitment

- **Conduct Market Analysis:** Identify and analyse the current social care providers in your area, focusing on their capacity and need for international recruits.
- **Engage with Providers:** Regularly communicate with social care providers to understand their recruitment needs and challenges.
- **Identify Gaps:** Determine areas where there is a shortage of skilled workers and where international recruitment could be beneficial.

Notes: Could use Coventry & Warwickshire provider questionnaire as a model for other LA's to use and develop.

Useful document: *International recruitment to adult social care: A guide for councils*, published by the LGA: <https://www.local.gov.uk/publications/international-recruitment-adult-social-care-guide-councils#market-shaping-commissioning-and-contract-management>

2. Process to Respond to Suspensions and Revocations of Licences

- **Establish Clear Protocols:** Develop and implement clear procedures for responding to suspensions and revocations of licences.
- **Immediate Communication:** Ensure timely communication with affected providers and recruits.
- **Support Mechanisms:** Provide support to displaced recruits, including legal advice and assistance in finding alternative employment.

LGA Checklist for councils

- Are council officers and providers aware of the compliance process when a sponsor licence is suspended or revoked? Do they understand how it might impact their business, their ability to maintain continuity of care and the potential safeguarding risk to those in receipt of care?
- Do you know who in the council receives notifications and the system for ensuring this gets to the right person to action? Are you confident that this part of the process works to ensure a timely response?
- Do you have effective working relationships with local partners to respond to issues arising from unethical practice?

Useful document – *Ensuring capacity to manage risk*, published by the LGA:

<https://www.local.gov.uk/publications/international-recruitment-adult-social-care-guide-councils#ensuring-capacity-to-manage-risk>

Useful document – *Steps in responding to non-compliance*, published by the LGA:

<https://www.local.gov.uk/publications/international-recruitment-adult-social-care-guide-councils#steps-in-responding-to-non-compliance>

3. Developing a Local IR Database of Licensed Employers and Displaced International Recruits

- **Create a Centralised Database:** Develop a comprehensive database that includes all licensed employers and displaced international recruits. WM ADASS Data is available but how does this get used locally – may want to look at how C&W and Staffordshire & Shropshire have developed that local approach to offer insight for other local authorities
- **Regular Updates:** Ensure the database is regularly updated with the latest information.
- **Data Security:** Implement robust data security measures to protect sensitive information.

LGA Checklist for councils

- Do you understand what services are in place in your locality, sub region and region to support displaced recruits? Through collaboration, there may be opportunities to collectively provide these services where they don't already exist.
- Are you engaging with local partners and the community and voluntary sector to explore which existing services could be widened to include international recruits?
- Do you ensure that there is access to information about support and advice for international recruits in the workplace?
- Are you proactively engaging with providers in the region on the use of overseas recruits prior to any suspensions or revocations? Build a conversation about quality and look for opportunities for providers to support in case of revocation. A strong provider network will enable opportunities for re-employment.
- Do you know what activity there is in your region to support displaced recruits with finding new employment
- Are you sharing practice and learning across the council and with other councils on supporting those with NRPF? Are you using the NRPF Network resources and training?

Useful document – *Steps in responding to non-compliance*, published by the LGA:
<https://www.local.gov.uk/publications/international-recruitment-adult-social-care-guide-councils#steps-in-responding-to-non-compliance>

4. Making Connections with Faith Groups and Community Groups

- **Identify Key Groups:** Map out local faith and community groups that international recruits may turn to for support.
- **Build Relationships:** Establish strong relationships with these groups to facilitate support networks for recruits.
- **Cultural Sensitivity:** Ensure that interactions with these groups are culturally sensitive and respectful.

Good practice with Shropshire, Telford & Wrekin connection with Citizens Advice Bureau

5. Providing Information and Support about Employment Rights (connection with WM IR Hub)

- **Clear Communication:** Provide clear and accessible information about employment rights to international recruits.
- **Workshops and Training:** Organise workshops and training sessions to educate recruits about their rights and responsibilities.
- **Support Services:** Offer support services, such as legal advice and advocacy, to help recruits navigate employment issues.

LGA Checklist for councils

- Are you working in partnership with providers, provider alliances, other councils, the Integrated Care Partnership and NHS partners in your region to share information and knowledge about international recruitment? Are you sharing good practice as well as the potential risks of unethical recruitment?
- Are you connected to the activity taking place at regional and sub regional level in relation to international recruitment?
- Do you encourage providers to establish feedback channels where international recruits can share their experiences, concerns, and suggestions for improvement? Feedback can be valuable in refining policies and support systems.
- Do you have connections with local partners and community groups who are delivering services that may be of value to international recruits?

Useful document – *refer to the section focusing on working collaboratively with providers and partners*, published by the LGA: <https://www.local.gov.uk/publications/international-recruitment-adult-social-care-guide-councils#working-collaboratively-with-providers-and-partnerships>

6. Support for Children and Families of International Recruits - local authority responsibilities towards children of IRs/Safeguarding

- **Holistic Support:** Develop programs that provide holistic support to the families of international recruits, including education, healthcare, and housing assistance.
- **Emergency Assistance:** Establish emergency assistance programs for families facing hardship due to displacement.
- **Community Integration:** Facilitate community integration programs to help families settle and thrive in their new environment.

LGA Checklist for councils

- Are staff in the council aware of how and where to whistle blow if they are concerned about what they believe to be unethical treatment or abuse of themselves or other staff?
- Do staff know how to refer slavery concerns through the National Referral Mechanism?
- Is there information available for international recruits, including guidance when people have concerns and signposting to appropriate organisations for reporting those concerns?
- Do staff have modern slavery and human trafficking awareness training? Adult safeguarding boards and community safety partnerships may be able to support this.
- Have you got an established process for working, both internally and with other agencies, to enable a joined-up response to instances of exploitation?
- Do you have clear links with the community safety partnerships, safeguarding boards and modern slavery teams to maintain a shared understanding of the issues? Do you take a collaborative approach in responding to them?

Useful document – *refer to the section on safeguarding*, published by the LGA:

<https://www.local.gov.uk/publications/international-recruitment-adult-social-care-guide-councils#safeguarding>

7. Collaboration with Quality Assurance Teams - Warwickshire audit as example of good practice but also the process and collaboration

- **Joint Audits:** Work with Quality Assurance teams to conduct joint audits of recruitment practices.
- **Best Practices:** Share best practices and develop guidelines to ensure ethical and effective recruitment.
- **Continuous Improvement:** Regularly review and improve recruitment processes based on audit findings.

Ask yourself if:

- local providers, commissioned and non-commissioned, are aware of their responsibilities regarding the recruitment and support of international recruits? Can they evidence this in their own practice and the practice of any recruiting agency they have used
- through your local commissioning and contracting functions have you satisfied yourself that providers are undertaking ethical recruitment to their workforce?
- you have contractual obligations in place to ensure providers are acting ethically and processes to monitor these?

- a current or new provider is offering new or significant additional capacity, can they identify where the staffing capacity is coming from? If it is via international recruitment, can they provide evidence of ethical recruitment and support of international staff?

Be cautious of recently established and/or registered providers who do not appear to have any, or a significant number of clients or any social care background.

- you have considered the impact of commissioning policies? Framework policies that encourage the recruitment of workers and give new providers easy access to framework agreements can impact on quality by providing access to unethical operators. Furthermore, new providers in a local authority area can undercut on prices, impacting on well-established providers.

Useful document – refer to the chapter focusing on market shaping, commissioning and contract management , published by the LGA:

<https://www.local.gov.uk/publications/international-recruitment-adult-social-care-guide-councils#market-shaping-commissioning-and-contract-management>

8. Regular Contact with Commissioned Providers Use existing approaches and connections with Care Associations

- **Scheduled Meetings:** Hold regular meetings with commissioned providers to discuss recruitment needs and challenges.
- **Feedback Mechanisms:** Implement feedback mechanisms to gather input from providers and recruits.
- **Collaborative Solutions:** Work collaboratively to develop solutions to recruitment challenges.

Good practice in Solihull with Trusted Providers

Useful document – refer to section focusing on working collaboratively with providers and partners, published by the LGA: <https://www.local.gov.uk/publications/international-recruitment-adult-social-care-guide-councils#working-collaboratively-with-providers-and-partnerships>

9. Process to Identify Risks with Non-Commissioned Providers (C&W good practice process)

- **Risk Assessment:** Conduct regular risk assessments of non-commissioned providers, particularly those serving self-funders.
- **Monitoring and Oversight:** Implement monitoring and oversight mechanisms to ensure compliance with recruitment standards.
- **Support and Guidance:** Provide support and guidance to non-commissioned providers to help them meet recruitment standards.

Useful document – a *guide focusing on International Recruitment in Adult Social Care*,
published by the LGA: <https://www.local.gov.uk/publications/international-recruitment-adult-social-care-guide-councils>

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Care Providers

International Recruits

West Midlands Care Association

Partners In Care (Shropshire, Telford, & Wrekin)

SARCP (Staffordshire & Stoke)

Citizens Advice Bureau (Shropshire, Telford, & Wrekin)

Church and Faith Groups

Skills for Care (National, Regional, and Local)

Shropshire Council

West Midlands ADASS

West Midlands Employers

The 14 Councils of the West Midlands

ADASS Regions e.g., NWADASS & established Academies, and National partners e.g., LGA

DHSC

UKVI

Bridgit Care

Lester Aldridge

Lifted Talent Ltd.