

Uneven fields: women workers' experiences of the Seasonal Worker Scheme

About us

Focus on Labour Exploitation (FLEX) is a research and policy organisation working towards an end to labour exploitation. FLEX seeks to achieve this vision through the prevention of labour abuses, protection of the rights of those affected or at risk of exploitation and by promoting best practice responses to labour exploitation through research and evidence-based advocacy.

Summary

Risks of labour exploitation can be heightened by gendered cultural and structural inequalities. Data collected by Focus on Labour Exploitation (FLEX) and the Department for Environment, Food, and Rural Affairs (Defra) on the experiences of migrant agricultural workers on farms in the UK on visas issued under the Seasonal Worker Scheme (SWS) evidences some of the specific experiences of women on the scheme. Drawing on this data, this briefing examines risks of labour exploitation for women workers resulting from the combination of the design of the scheme and structural gender inequalities. The briefing also highlights where further research is needed to better understand the risks on the scheme from a gender perspective.

Warning: this briefing contains some accounts of incidents that people may find distressing or traumatic. This includes incidences of sexual harassment, threats of sexual violence, and other forms of violence.

1. Introduction

Gendered cultural and structural inequalities have an impact on women's experiences in the workplace. For instance, this may be experienced through unequal treatment and opportunities, gender pay gaps,¹ discrimination relating to traditional caring responsibilities and pregnancy, as well as gender-based violence.

It is essential to consider how gender inequalities interact with other social inequalities such as age, race, class, nationality, religion, disability, sexual orientation and migration status, among others. An intersectional gender perspective can better our understanding of the gendered dynamics in the workplace that increase risks of labour exploitation. In this study, we have analysed how gender inequalities intersect with restrictive visa conditions, and how, along with low pay and other characteristics of work in agriculture, it can create accumulated layers of disadvantage that can put workers at increased risk of labour exploitation. A larger sample is needed to explore the interaction of other social inequalities such as nationality or race or gender identities beyond the binary.

In 2024, FLEX published a series of three reports on the risk of exploitation for migrant agricultural workers on the UK's Seasonal Worker Scheme.² The objective of the research was to analyse risks of exploitation on the SWS related to the design of the scheme. The data collected for FLEX's research on the SWS evidenced that some of the risks explored in FLEX's series of reports on the scheme, were more acutely suffered by the women participants. In addition, the testimonies shared in the 23 interviews with women workers on the scheme highlighted some of the gendered experiences that require further attention.

Drawing on survey and interview data from FLEX's research,³ as well as wider studies on the scheme, including the 2022, 2023, and 2024 worker surveys conducted by the Department for Environment, Food, and Rural Affairs (Defra),^{4,5} this briefing seeks to shed some light on the experiences of migrant women agricultural workers on the SWS in order to draw attention to the need for a better understanding of the interaction of gender and risks of labour exploitation. Further, it seeks to highlight the urgency for improved gender awareness on the scheme and the need for gender responsive labour market enforcement.

1 Office for National Statistics (ONS), ['Gender Pay Gap in the UK: 2024'](#), 29 October 2024.

2 Focus on Labour Exploitation (FLEX), ['Bearing Fruit: Making Recruitment Fairer for Migrant Workers'](#) (2024); Focus on Labour Exploitation (FLEX), ['Bound to Work: Improving Access to Redress on the UK's Seasonal Worker Scheme'](#) (2024); Focus on Labour Exploitation (FLEX), ['Not Here for the Weather: Ensuring Safe and Fair Conditions on the UK's Seasonal Worker Scheme'](#) (2024).

3 Data collection took place between August 2022 and the end of October 2023. 399 surveys and 83 interviews with migrant workers on the SWS were carried out by caseworkers/researchers from FLEX's partner organisations, Rosmini Centre Wisbech, Citizen Advice South Lincolnshire, and the Southeast and East Asian Centre (SEEAC). 28.1% of survey respondents and 27.7% of interview participants were women.

4 Department for Environment, Food and Rural Affairs (Defra) and Home Office, ['Seasonal Workers Survey Data 2022'](#), 21 October 2024; Department for Environment, Food and Rural Affairs (Defra) and Home Office, ['Seasonal Workers Survey Data 2023'](#), 21 October 2024; Department for Environment, Food and Rural Affairs (Defra) and Home Office, ['Seasonal Workers Survey Data 2024'](#), 8 July 2025.

5 It is important to note the methodological limitations of the Defra surveys, which are distributed by scheme operators on behalf of Defra to workers who previously held seasonal worker visas. The Defra surveys are not independent of the UK government or scheme operators. See: Seasonal Worker Interest Group, ['ODLME Labour Market Enforcement Strategy 2025/26: Seasonal Worker Interest Group Submission'](#) (2025).

The SWS is a labour migration route that facilitates the recruitment of workers from anywhere in the world to work on UK farms in horticulture or poultry production. In February 2025 the UK Government confirmed that they were extending the visa route for five years⁶ with 45,000 seasonal worker visas available for 2025 (43,000 for horticulture and 2,000 for poultry).⁷ A small number of private recruitment companies (known as labour providers or ‘scheme operators’) recruit workers from abroad, acting as their visa sponsor, and allocate the workers to UK farms where they are employed.⁸ Scheme operators must be endorsed by Defra and licenced by the Gangmasters and Labour Abuse Authority (GLAA), and the Home Office has responsibility for the overall operation of the scheme (see figure 1).⁹ The route imposes restrictions on workers’ rights and conditions while in the UK, which include:

- A maximum 6-month stay in any 12-month period if employed in horticulture
- A maximum 3-month stay if employed in poultry production (limited to a period between Oct - Dec)
- No route to settlement
- No recourse to public funds
- No option to bring family or dependants
- Employment limited to certain agricultural roles, and only on farms where workers are placed by the scheme operator who sponsored their visa

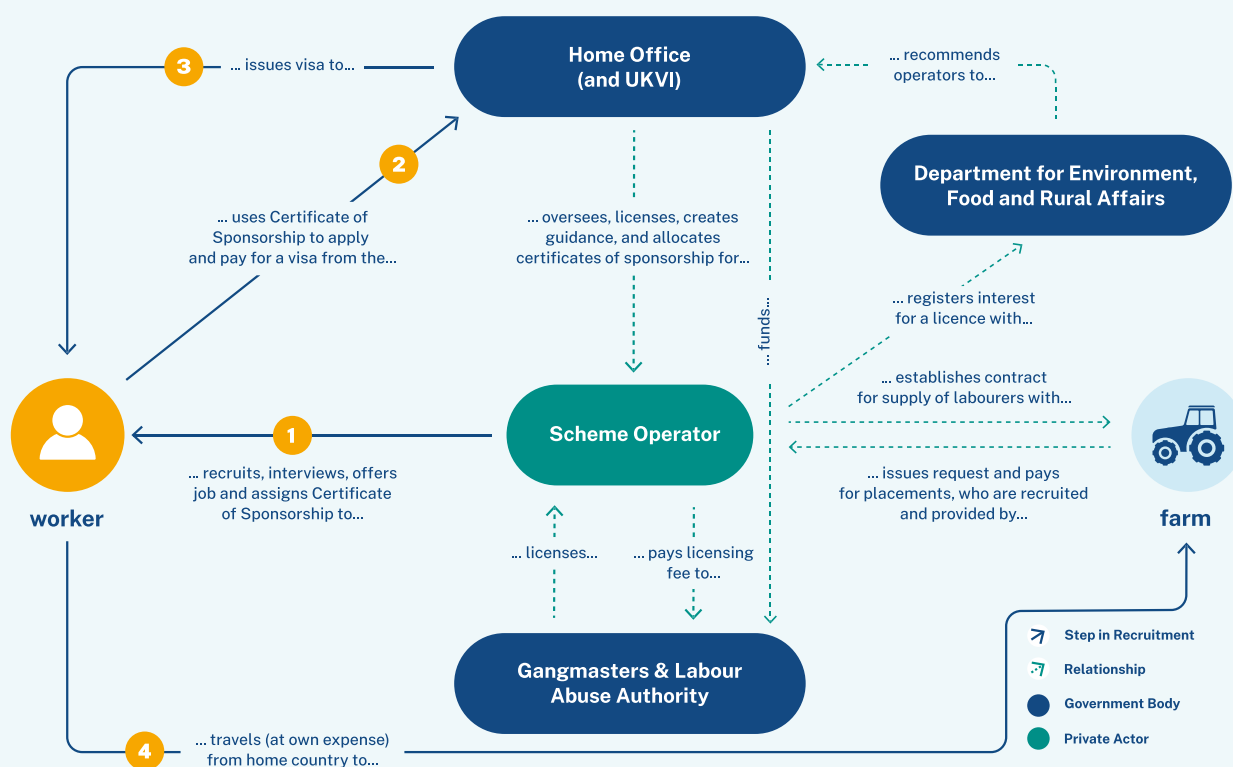


Figure 1. Overview of recruitment pathways for the SWS.

6 Department for Environment, Food and Rural Affairs (Defra) and The Rt Hon Steve Reed OBE MP, ‘[Environment Secretary Steve Reed - NFU Conference Speech](#)’, 25 February 2025.

7 Department for Environment, Food & Rural Affairs and Daniel Zeichner MP, ‘[Government Provides Certainty to Horticulture and Poultry Businesses](#)’, GOV.UK, 21 October 2024; Department for Environment, Food and Rural Affairs (Defra) and The Rt Hon Steve Barclay MP, ‘[Government Ensures Long-Term Certainty for Food Labour Needs](#)’, 9 May 2024.

8 There are currently 6 scheme operators at the time of writing. UK Visas and Immigration (UKVI), ‘[Register of Licensed Sponsors: Workers](#)’, GOV.UK, 29 October 2024.

9 UK Visas and Immigration (UKVI), ‘[Workers and Temporary Workers: Guidance for Sponsors: Sponsor a Seasonal Worker](#)’, 9 April 2025.

2. Recruitment related risks

FLEX's research uncovered risks related to deception about the nature of the job and recruitment linked to debt.¹⁰ Seasonal workers are generally expected to cover the cost of their visa and flights to the UK and workers also report having to pay various additional administrative costs within their home countries. Responding to FLEX's survey, workers reported paying a wide range of fees before coming to the UK. Workers reported paying between £0 – £5,500, with a median amount of £875 (± 962) and a mean of £1,231 (overall average). The FLEX survey found that the majority of workers had taken out a loan to cover the costs to come to the UK, with a higher proportion of women (76.8%) than men (69.9%) reporting having taken out a loan. In interviews, many women shared that they had needed to borrow money to come on the scheme:

“I was really struggling financially and I had to borrow money from my neighbours and relatives. I paid £600 to the third party who arranged everything for me.”

Woman in her mid forties from a Central Asian Nation. 2022.¹¹

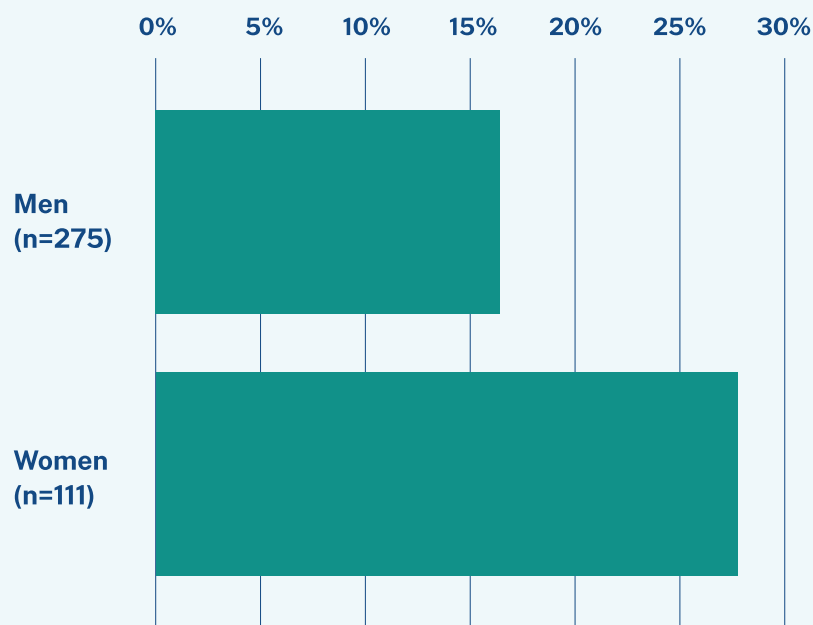
Once within the UK, workers may also be required to pay for various items and services in order to live and carry out their work. Such costs vary from farm to farm. Concerningly, Defra's 2023 and 2024 survey data revealed a situation where it was more common for women workers on the scheme to be paying for accommodation (2023: W:31.1%; M:25.7%, 2024: W:47.8%; M:40.8%), travel costs within the UK (2023: W:33.1%; M:28.5%, 2024: W:42.8%; M:35.2%), travel costs to get to the farm when arriving in the UK / to get to a new farm (2023: W:37.6%; M:26.6%, 2024: W:48.8%; M:40.5%), for personal protective equipment (that their employer said they must wear/use for their safety) (2023: W:8.5%; M:5%, 2024: W:8.3%; M:6.8%), living essentials (such as bedding and cooking utensils) (2023: W:27.3%; M:19.5%, 2024: W:34.5%; M:25.6%), utilities (such as gas, electricity and water) (2023: W:21.2%; M:17.8%, 2024: W:21.7%; M:17.3%) and laundry (2023: W:21.4%; M:16.6%, 2024: W:19.8%; M:15.2%). Correspondingly, while not an answer option in 2024, in 2023 data, men were more likely to report paying nothing once in the UK (W:23.7%; M:33.2%).

While the options workers could select in the 2022 Defra survey were not exactly the same as in 2023 and 2024, the results for men and women responding to the question on what they were required to pay for once in the UK were more evenly split in 2022. Roughly the same percentage of men and women on the scheme reported paying for travel costs within the UK (W:57.9%; M:57.3%), equipment fees (W:37.8%; M:36.9%), medical fees (W:0.7%; M:1.3%), living essentials (W:5.5%; M:6.7%), other (W:25.7%; M:27.2%) or nothing (W:22.9%; M:23.1%), and a slightly higher percentage of men reported paying for training fees (W:2.4%; M:6.1%).

Workers paying high costs to join the scheme, and taking on debt to do so, is particularly alarming given that the FLEX survey also revealed gaps in the information workers received prior to joining the scheme, as well as inaccurate information being shared. When asked about the information they received before traveling to the UK, a higher percentage of women on the scheme found that the information they had been given prior to coming to the UK was inaccurate, which included inaccurate information on their accommodation (W:36.6%; M:29.6%) and their job tasks (W:25%; M:21.7%). When asked about pay, 27% of women said they had experienced being paid lower than promised whilst on the scheme, compared to 16.4% of men (see figure 2).

10 Focus on Labour Exploitation (FLEX), *'Bearing Fruit: Making Recruitment Fairer for Migrant Workers'*.

11 The names of interviewees have been removed and only the gender, age range and region of interviewees as well as the year of interview have been included. This was done for the purposes of preserving anonymity and does not intend to suggest that women in the same age range or from the same region would necessarily have the same experiences.



**Figure 2. In your current or most recent agricultural job in the UK, have you experienced any of the following regarding your pay?:
Being paid a lower amount than promised (n=376).**

A mismatch between what they had expected and the reality of the work on the scheme was also reflected in FLEX’s interviews with women on the scheme. This included differences in the hours they were expected to work and differences in the type of work:

“Well, how to put it. When I was promised one thing but got something totally different. And the work I was promised, I did not do it at all. I was told I would work in heated greenhouses to pick strawberries, raspberries, blueberries and gooseberries. When I arrived I never saw these berries. When we got here, the job had already finished.”

Woman in her late forties from an Eastern European Nation. 2022.

Some women we interviewed revealed that the work was a lot more physically demanding than they had expected:

“It’s terrible, I’ve lost a lot of weight during this period since I came, the impact, the climatic conditions, the accommodation conditions, everything is different, it’s very difficult [...]. Honestly, I feel like I’m a slave from the movies I saw when I was a child, sometimes exploited to the maximum.”

Woman in her early forties from an Eastern European Nation. 2023.

Speaking more generally about their experience and whether they would want to return to the UK on a seasonal worker visa, a number of women we interviewed said they had expected more from the conditions or the treatment on UK farms and had been disappointed:

“I will try to go to work in another country when I get back. I was expecting more from this place. I heard people praising/recommending this workplace.”

Woman in her late twenties from an Eastern European Nation. 2022.

“Wow, I can’t wait for this visa to expire, I neither got richer nor poorer, but I want to go back to my country [...] I didn’t expect this. It’s a bad experience for me.”

Woman in her early forties from an Eastern European Nation. 2023.

3. Working conditions

FLEX’s research highlighted that issues with the number of hours available to seasonal workers had been a consistent theme among research participants.¹² Workers reported working fewer than 32 hours per week, which persisted beyond the introduction of a minimum 32 hours of pay per week (averaged across their pay period) in April 2023.¹³ Reports of few working hours, or conversely, very long working days, interact with other issues, such as the ability to pay off debts, underpayment, the achievability of productivity targets and exhaustion. For example, many workers reported receiving fewer hours than they expected, which impacted their ability to recover their recruitment-related costs and earn a decent wage:

“This farm always has work. Other farms have days without work, I have heard complaints that people on other farms only work 3-4 hours a day. I have heard from others. Our farm has work. It’s just that my body is already failing because of waking up at 3am every day.”

Woman in her early thirties from a Central Asian Nation. 2023.

FLEX survey data found that few working hours was an issue more acutely felt by women workers on the scheme, with 21% of women reporting working fewer than 32 hours per week compared to 11% of men (see figure 3).

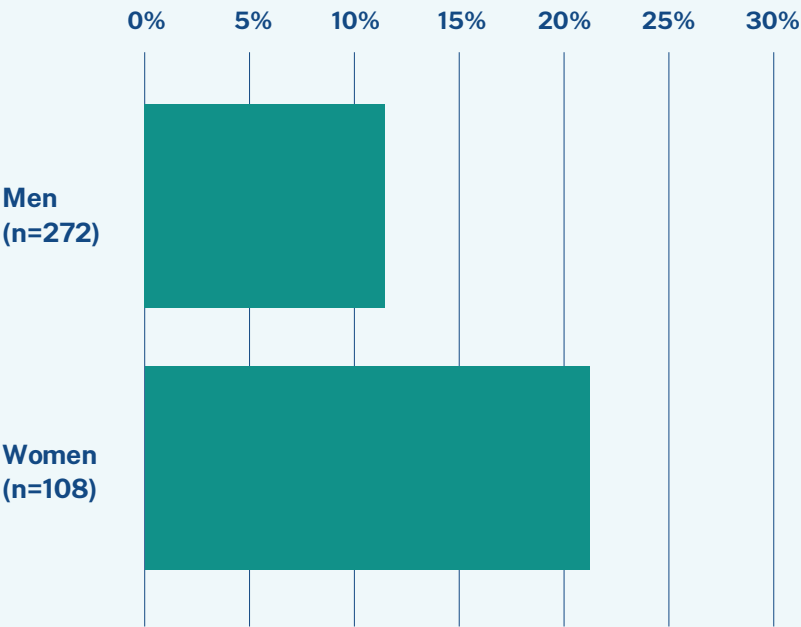


Figure 3. How many hours per week do you usually work? (Average / normal week if this varies): less than 32 hours per week (n=380).

12 Focus on Labour Exploitation (FLEX), [‘Not Here for the Weather: Ensuring Safe and Fair Conditions on the UK’s Seasonal Worker Scheme’](#).

13 Department for Environment, Food and Rural Affairs (Defra) and The Rt Hon Sir Mark Spencer, [‘Farming Minister Mark Spencer: National Farmers Union Conference’](#), GOV.UK, 21 February 2023.

Scheme guidance states that workers should be paid the National Living Wage (NLW) and be provided at least 32 hours of paid employment each week.¹⁴ Piece rates or productivity targets are also sometimes used on the scheme, which can lead to considerable confusion on payslips.¹⁵ FLEX survey data found that workers were often unclear on how piece rates were calculated, with a higher percentage of women reporting that they never understand how their piece rate is calculated (W:24%; M:17.4%). Both men and women on the scheme reported issues with the achievability of the targets given to them. In interviews, multiple women shared that they felt they worked like a “slave” in order to meet targets. One seasonal worker explained:

“I don’t think it’s possible to reach [targets] every day. You know, they’re very, very hard. You need to work like a robot, and what’s the point in breaking your back if after that you go back home and you pay for medical bills.”

Woman in her mid twenties from an Eastern European Nation. 2023.

With regards to being incentivised to work faster to meet targets, in interviews workers on the scheme shared examples of being shouted at or being sent back to their caravan for not working fast enough to meet their targets:

“When they can’t meet targets, they send them back to caravan, there was many times when they send me back.”

Woman in her mid twenties from a Central Asian Nation. 2023.

Workers on the scheme also reported not being paid for all their work or for all the pieces they picked. Both the FLEX survey and the Defra 2022 survey found that women were more affected by this. Responding to the FLEX survey, a higher percentage of women said they were sometimes (W:17.5%; M:11.1%) or usually (W:13.4%; M:7.1%) not paid for all the pieces they picked. Similarly, a higher percentage of women that responded to the Defra 2022 survey reported not being paid for all the work they did (W:17.6%; M:13.5%). The 2023 and 2024 Defra surveys found a more equal split between men and women reporting not being paid for all the work they did (2023: W:11.9%; M:12.1%, 2024: W:2.9%; M:4.0%).

In line with previous research, many of the women we interviewed also raised concerns about pieces not being counted properly or not receiving payment for all the hours they worked. They spoke about containers going missing, paired with few hours work, further impeding them from receiving a decent wage or meeting targets:

“I notice that when we have some overtime like 30 mins in a day, they do not count them in. In the office there is a computer, every day we can go there, log in and look how much we earn, and 30 mins is missing. All they count is 11 hours, breaks are not paid too. I do not know the reason why they are not counting them in.”

Woman in her early thirties from a Central Asian Nation. 2023.

“You see, I first went to Scotland [...] over there it was a serious problem with missing containers.”

Woman in her early forties from a Central Asian Nation. 2023.

14 UK Visas and Immigration (UKVI), [‘Workers and Temporary Workers: Guidance for Sponsors: Sponsor a Seasonal Worker’](#).

15 Seasonal Worker Interest Group, [‘ODLME Labour Market Enforcement Strategy 2025/26: Seasonal Worker Interest Group Submission’](#).

Some women interviewed felt that menstruation or physical differences like height made the work even harder:

“I mean, if it is hard to be a woman, and you have that period every month, but it doesn’t count, you’re sick, you’re not sick, you have to work, no one believes you.”

Woman in her early forties from an Eastern European Nation. 2023.

(Worker) “Huge pallet and a short [woman], she is not a strong man to do this job. Boxes full of coriander or dill on these pallets that are very high. For a [woman] to reach the top of these pallets, she has to use a plastic bin, turn it around and step on it.”

(Interviewer) “Oh dear, that’s hard.”

(Worker) “It’s very hard and that’s a situation I remember and you are getting yelled at.”

Woman in her early thirties from an Eastern European Nation. 2023.

Whilst some women interviewed reported having exactly the same work as men, a couple of women stated that they were separated on their farms, with men working outside and women working inside in the packhouse:

“[Men] worked outside in the rain, I was inside. We were women. But we got something different to what was promised to us.”

Woman in her late forties from an Eastern European Nation. 2022.

“In current working place they separate responsibilities, men have harder physical work and [women] easier, very nice from them to think about us, because on other farms everything was equal.”

Woman in her late thirties from a Central Asian Nation. 2023.

Whilst some of the women workers interviewed found this separation of roles by gender preferential, it would also be worth investigating whether this impacted the earning potential of the different genders working on the farm. The Migration Advisory Committee (MAC) commissioned a review of the experiences of farms using the scheme which was published in August 2024. The review was based on 30 interviews which took place between August 2023 - May 2024 with senior leaders within farms, ‘including the owners, CEOs, heads of HR, Managing Directors and heads of Operations.’ The review discussed the different roles within farms, with some roles having grades, ‘meaning that workers could earn more seniority, and with it, higher pay.’ It also stated that the allocation of roles sometimes ‘had an impact on pay, with performance bonuses more common in picking jobs.’

The review found that some farms had been ‘surprised’ by the number of women coming through the scheme, given that in the past, the majority of seasonal agricultural workers on their farms had been men. Some also commented on the different skills they attributed to different genders, with one stating: ‘There’s a lot of ladies, they’ve got very good communication skills and they’re quite dextrous...we’ve got more ladies than men.’ The review also made reference to the fact that gender and the separation of roles and responsibilities could become an area of contention and discrimination among workers: ‘One large edible horticulture farm in the southwest of England said they had experienced teams of men working outdoors, picking, who became frustrated when they had a woman in their team who they perceived to be picking slower than them, arguing that she should therefore work in the packhouse instead.’¹⁶ Research into migrant agricultural work in Spain

16 Migration Advisory Committee (MAC) and Revealing Reality, [‘Exploring the Experiences of Farms Using the Seasonal Worker Scheme in The UK’](#) (2024).

found a similar separation of roles: ‘Regarding gender, in Lleida, Spain, men do most of the picking work in the fields, and women do most of the packing in the plants based on the gendered preconception that the former are supposedly stronger and the latter more careful.’¹⁷

In FLEX’s interviews with women on the scheme, one of the workers on a farm that splits the roles by gender shared that, when workers are sent home before the end of the 6-month visa period because the farm does not have enough work for all of the workers, the farm usually keeps the men seasonal workers. This is particularly concerning given that the amount of time workers are given to work on UK farms, evidently impacts the amount of money they can earn in the UK and their ability to repay debts incurred to join the scheme:

“There is [the] possibility that after 4 months of work they send us home because there is no more work for us, usually they keep men.”

Woman in her late thirties from a Central Asian Nation. 2023.

A similar picture was revealed in Defra’s 2023 and 2024 survey data, where men were more likely than women to work in the UK for 5 months or longer of their 6-month visa (2023: W:62.1%; M:71.3%, 2024: W:70.7%; M:75.7%). Whereas the 2022 Defra survey data found a more even split between genders (W:61.1%; M:60.6%). The 2023 and 2024 Defra surveys also revealed that a slightly higher percentage of women compared to men reported working less than their contract specified (2023: W:32.6%; M:28.2%, 2024: W:23.8%; M:20.6%).¹⁸

4. Living conditions

FLEX’s interviews with women on the scheme, revealed that workers are sometimes placed in mixed gender accommodation. One woman shared her experience of living with men that would steal her food and said that she would prefer to have the option to live with other women:

“I would also appreciate to live with [women] and not to have mixed gender accommodation. I was tired of harassment and I have seen them fight.”

Woman in her mid forties from a Central Asian Nation. 2022.

We also heard of instances of women being placed in women only caravans:

“Usually, we wake up all together in the morning, in caravan only [women], there is friendly environment here, we work in same group. Breakfast we have together then we all going to work.”

Woman in her late teens from a Central Asian Nation. 2023.

The women we interviewed had concerns around the cramped conditions and the lack of privacy in their caravans:

(Worker) “Well, we live in a caravan. There are three bedrooms there. It’s definitely not what I was expecting. It’s clean but you have to share it with lots of different people. You have to wait when you need to go to the bathroom, because it’s just one bathroom. You can hear everything people are saying, like in another room, so you don’t have a lot of intimacy.”

17 Carlos Ruiz-Ramírez, Juan Castillo-Rojas-Marcos, and Yoan Molinero-Gerbeau, *‘Essential but Invisible and Exploited: A Literature Review of Migrant Workers’ Experiences in European Agriculture’* (Oxfam, 2024).

18 This question was not asked in the Defra 2022 survey.

(Interviewer) “There is not much private space?”

(Worker) “Yeah, not at all. If I need to call home, I’m going somewhere in a field. Like somewhere far away, you know, to have a normal conversation that I don’t want other people to hear. But at least, yeah, there is a toilet, shower.”

Woman in her mid twenties from an Eastern European Nation. 2023.

Some women had safety concerns around sharing living spaces with other men workers. Showers without locks came up in multiple interviews:

“You see, there is no privacy, the toilet is outside and it’s cold now. There are shower cubicles. Some time ago there were no locks and there were many men using them.”

Woman in her mid forties from a Central Asian Nation. 2022.

“Our farm did not have any onsite accommodation and we were housed in a hostel which belonged to another farm. It was overcrowded and very cold. Showers did not have lockable doors and they were unisex. I did not have enough privacy.”

Woman in her early thirties from an Eastern European Nation. 2022.

“The housing is terrible and where we sleep the rooms are small with bunk beds, but you can’t imagine the hygiene conditions of the toilet and showers. It’s awful, men coming in over the women [...] many times I’m afraid to go and take a shower.”

Woman in her early forties from an Eastern European Nation. 2023.

“Let’s suppose one of the guys would enter my caravan, I wouldn’t be able to protect myself.”

Woman in her early forties from a Central Asian Nation. 2023.

The Home Office tasks scheme operators with monitoring worker welfare, and offers extremely minimal guidance on what this means for accommodation standards, only stipulating that ‘workers are housed in hygienic and safe accommodation that is in a good state of repair.’¹⁹ There is, however, no responsible enforcement body for inspecting worker accommodation.²⁰

As demonstrated in the MAC review, farms reported that they had not been expecting to receive so many women on the scheme.²¹ It is therefore essential that the Home Office ensures that farms are able to fairly and safely employ and house women seasonal workers. This must involve an understanding from farm employers and scheme operators of how gendered dynamics impact women’s experiences on UK farms and a responsible government body with adequate enforcement powers to effectively monitor the living conditions of seasonal workers.

19 UK Visas and Immigration (UKVI), [‘Workers and Temporary Workers: Guidance for Sponsors: Sponsor a Seasonal Worker’](#).

20 Seasonal Worker Interest Group, [‘ODLME Labour Market Enforcement Strategy 2025/26: Seasonal Worker Interest Group Submission’](#).

21 Migration Advisory Committee (MAC) and Revealing Reality, [‘Exploring the Experiences of Farms Using the Seasonal Worker Scheme in The UK’](#).

5. Sexual harassment and violence

Responding to a question in the FLEX survey on whether they were expected to provide sexual services, one woman said they were expected to ‘regularly’, another ‘sometimes’ and two women responded that they didn’t know or preferred not to say.²² Four women that responded to the FLEX survey reported experiencing unwanted sexual attention. Given how normalised certain forms of sexual harassment can be, and how difficult it is to name as such, as well as how often sexual harassment goes underreported, our own research has most likely identified a small proportion of the actual cases within our sample. Two of the women interviewed that came to the scheme on their own, mentioned harassment from other workers on the farm. One stated “I was tired of harassment” and when asked if she’d ever been threatened by a colleague or a manager, she responded:

“Not really, not management. But the other male workers when they get drunk, they behave inappropriately.”

Woman in her mid forties from a Central Asian Nation. 2022.

Another interviewee was continuously harassed by multiple men on her farm:

“He wants me to agree to his terms by becoming his lover or a whore. He is trying to achieve this. [...] He has been mocking me, taking photos of me without my consent, scaring me. He has been saying he would upload my photos on the web.”

Woman in her early forties from a Central Asian Nation. 2023.

The harassment also involved spreading rumours about her and threatening multiple perpetrator rape. When the worker reported the harassment to the farm where she worked, it was not initially acted upon, but later she was moved to a different team. The harassment continued and the worker experiencing the harassment reported to us that she had been told “that the farm did not need any problems.” The farm also called a meeting bringing the worker experiencing the harassment and a group of eight men making rape threats to the same room to share their accounts of what had happened. ACAS guidelines state that employers handling sexual harassment allegations must ensure those that have experienced sexual harassment are spoken to privately, and in an environment where they feel safe.²³ In addition, the Employment Rights Bill proposes that a disclosure of whether sexual harassment has occurred, is occurring or is likely to occur should be added to the ‘disclosures qualifying for protection’ under the Employment Rights Act 1996.²⁴ In stark contrast, the interviewee told us the meeting was “Me alone, the manager and eight [of them]” (Woman in her early forties from a Central Asian Nation. 2023).

Sections 109 and sections 110 of the Equality Act 2010 stipulate that when a worker is harassing their colleague, both the harasser and the employer are responsible through vicarious liability.²⁵ However, in this instance, the employer’s solution was to threaten to relocate the person that had experienced violence to a different work site, with no consequences for the perpetrators. “Manager got scared. I told him that he did not punish the culprits and that they had started behaving even worse now. The manager said that it was not practical for him to move eight people to another team. It’s easier to get rid of me than eight workers” (Woman in her early forties from a Central Asian Nation. 2023). FLEX research into sexual harassment in low paid and insecure work found that it is typical for employers to remove the victim, rather than the perpetrator, thus penalising the victim rather than the perpetrator and discouraging future reporting of sexual harassment.

22 It is worth noting that our survey data also found that this is an issue affecting men on the scheme.

23 ACAS, [‘Sexual Harassment: Handling a Complaint’](#), 28 October 2024

24 [Employment Rights Bill](#), 2024, HL Bill 81 2024-25, accessed 30 May 2025.

25 [Equality Act](#), 2010, c.15, accessed 23 December 2024.

Despite the employer's responsibility to protect workers from sexual harassment, too often companies do not have any formal processes to deal with sexual harassment.²⁶

The UK enforcement landscape for ensuring employers fulfil their duties in relation to sexual harassment at work is also bleak. UK labour market enforcement is extremely fragmented, and there is currently no enforcement agency that holds all the necessary elements (remit, power and resources) to effectively enforce legislation on sexual harassment at work. The Equality and Human Rights Commission (EHRC) is the public body responsible for enforcing the Equality Act 2010, however, FLEX has previously drawn attention to the EHRC's limited enforcement powers and limited resources. FLEX's research into sexual harassment at work has also pointed to the role of the Health and Safety Executive (HSE) in tackling violence at work, yet they do not recognise sexual harassment as a mainstream health and safety issue under the Health and Safety at Work Act 1974.²⁷ With regards to the fragmented nature of the UK's labour market enforcement, FLEX has continuously advocated for labour market enforcement powers to be combined into one Single Enforcement Body (SEB).²⁸ The Labour government has committed to the creation of a Fair Work Agency (FWA) which would combine three of the current six enforcement agencies. Whilst the FWA does not include the EHRC or the HSE, the FWA could support the work of the EHRC, by having a specific mandate to use its enforcement powers to secure compliance with the Equality Act 2010.²⁹

In this instance, when sexual violence threats had been made towards a woman worker on a UK farm, the individual worker did not want to speak directly to authorities due to fear of retaliation from the farm management. She was also hesitant to ask for a transfer from her scheme operator as she felt she would have the same situation on another farm, owing to the fact she was a single woman who had come to the scheme on her own. Her perception that the situation would be the same on any farm in the UK speaks to a culture of normalisation of sexual harassment in the agriculture sector. Previous FLEX research into the cleaning sector identified a list of a variety of different forms of sexual harassment, and found that not only do workers face barriers to reporting sexual harassment, but also in accessing information on what qualifies as sexual harassment. Workers are further obstructed from reporting sexual harassment where there is a culture of misogyny and a tendency to downplay the seriousness of sexual harassment and a negligence towards resolving sexual harassment complaints in ways that would actually investigate incidents and penalise the perpetrators. Our research in the cleaning sector found that various forms of sexual harassment had become normalised as part of the job and as behaviour that women were expected to tolerate.³⁰ In a male dominated sector like agriculture, that takes place in isolated locations, where women are expected to share living and bathing facilities with men they do not know, it is easy to imagine situations where sexual harassment is enabled, owing to a culture of tolerance of abusive behaviour and which in turn acts as a deterrent for reporting sexual harassment. In this instance, rape threats should have been treated by the employer as gross misconduct and reported to the police.

The worker that had received rape threats was also concerned about how escalating the situation would affect their employment. FLEX research into sexual harassment found that the risk of losing work (whether real or perceived), was one of the clearest factors that exacerbates power imbalances in the workplace, and therefore enables sexual harassment to take place. In addition, the experience of this worker demonstrates how intersecting vulnerabilities can create increased risk of sexual harassment for certain groups and

26 Focus on Labour Exploitation (FLEX), [‘Tackling Sexual Harassment in Low-Paid and Insecure Work’](#) (2022).

27 Focus on Labour Exploitation (FLEX), [‘Tackling Sexual Harassment in Low-Paid and Insecure Work’](#).

28 Focus on Labour Exploitation (FLEX), [‘A Single Enforcement Body: What an effective Single Enforcement Body looks like’](#) (2023).

29 Department for Business, Energy and Industrial Strategy (BEIS), [‘Establishing a new single enforcement body for employment rights. Government response’](#) (2021).

30 Focus on Labour Exploitation (FLEX), [‘“If I Could Change Anything about My Work...” Participatory Research with Cleaners in the UK. Working Paper No. 1’](#) (2021).

additional barriers to enforcing rights at work.³¹ The fear of losing work is further compounded for those on the SWS since they have multiple dependencies on their employer, relying on them for work and their accommodation. Those in low pay are also likely to have greater fear of losing their job as they are less likely to have savings making them more financially vulnerable and dependent on their job. The restrictive conditions of the SWS also compound fears of losing work, since workers on the scheme do not have recourse to public funds, are limited to agriculture roles that they are placed in by their scheme operator, and are reliant on their work for their right to stay in the UK. Having restricted employment options and limited access to support reduces the leverage of workers on the seasonal worker scheme to be able to remove themselves from situations of labour abuse, including sexual harassment:

“Being single and having experienced all this nightmare. Someone on the farm should be tasked to ensure the safety of lone female workers. [...] Please pass this recommendation to the UK government to let them know that lone female workers need protection.”

Woman in her early forties from a Central Asian Nation. 2023.

Further attempts to address sexual harassment in the workplace in legislation, such as the provisions for protection from harassment within the Employment Rights Bill, must be accompanied by proactive labour market monitoring in order to be effective. It is vital that any enforcement on sexual harassment takes into consideration the ways in which accumulated layers of disadvantage, like gender inequalities, restrictive visa conditions and being on low wages, generally result in higher rates of abuse and create additional barriers to reporting abuse. Labour market enforcement must be sufficiently resourced to be able to ensure employers on the SWS uphold their responsibility to prevent the sexual harassment of their employees. This should include but not be limited to compulsory, in-depth training on sexual harassment for all staff in a language they understand, so that workers and employers have a clear understanding of what constitutes sexual harassment. Farms must put in place zero-tolerance to sexual harassment policies and make these known to workers in a language they understand as well as providing and clearly communicating safe pathways for workers to report sexual harassment.

6. Ability to seek redress and leave exploitative conditions

FLEX research has examined risks of exploitation on the SWS related to the ability of workers on the scheme to change employers and to access justice.³² Workers on the SWS can request that their scheme operator transfers them to another farm, and it is the responsibility of the operators to ‘establish a clear employer transfer pathway, including transparent criteria for making a transfer request and a process for considering such request,’ which should be communicated to workers before they start work.³³

FLEX research as well as other research into the scheme found large proportions of workers with little knowledge or confusion around the transfer process as well as few people being granted transfers when requested.³⁴

31 Focus on Labour Exploitation (FLEX), [‘Tackling Sexual Harassment in Low-Paid and Insecure Work’](#).

32 Focus on Labour Exploitation (FLEX), [‘Bound to Work: Improving Access to Redress on the UK’s Seasonal Worker Scheme’](#).

33 UK Visas and Immigration (UKVI), [‘Workers and Temporary Workers: Guidance for Sponsors: Sponsor a Seasonal Worker’](#).

34 Independent Chief Inspector of Borders and Immigration (ICIBI), [‘An Inspection of the Immigration System as It Relates to the Agricultural Sector: May–August 2022’](#) (2022); Focus on Labour Exploitation (FLEX), [‘Not Here for the Weather: Ensuring Safe and Fair Conditions on the UK’s Seasonal Worker Scheme’](#); Focus on Labour Exploitation (FLEX), [‘Bound to Work: Improving Access to Redress on the UK’s Seasonal Worker Scheme’](#); Focus on Labour Exploitation (FLEX), [‘Bearing Fruit: Making Recruitment Fairer for Migrant Workers’](#); Inga Theimann, [‘UK Agriculture and Care Visas: Worker Exploitation and Obstacles to Redress’](#) (Modern Slavery & Human Rights Policy & Evidence Centre, 2024); Work Rights Centre, [‘Evidence Submission, Migration Advisory Committee – Seasonal Worker Scheme \(SWS\) Visa Inquiry \(Representative Organisations\)’](#) (2023).

Of those that responded to the FLEX survey and had requested a transfer, a slightly higher percentage of men had had their transfer request accepted (W:8%; M:10.2%). Similarly, Defra's 2022 survey found that a slightly higher percentage of women who had requested a transfer had had their request denied (W:46.3%; M:43.5%) and of those whose transfers were accepted, a higher percentage of men said they were happy once they had transferred (W:42.1%; M:48.1%). Defra's 2023 survey also found that a slightly higher percentage of women who had requested a transfer had had their request denied (W:32.2%; M:29.1%). In Defra's 2024 data, a slightly higher percentage of men reported they were not transferred after making a request (W:36.3%; M:38.5%). The option to state whether you were happy once transferred was not included in the 2023 and 2024 Defra surveys. According to FLEX's survey, more women than men said they had no information on changing employers (W:31.5%; M:24%). A lack of information on changing employers was also apparent in FLEX's interviews with women on the scheme. Interviewees mentioned not knowing their rights, not knowing who to talk to or not feeling they could make themselves understood as barriers to making transfer requests or for raising concerns.

A study conducted by the University of Nottingham Rights Lab on grievance mechanisms and access to remedy for seasonal migrant workers in UK agriculture, found 'a general lack of consideration of gender-specific risks in the adoption of GMs [grievance mechanisms] within the SWS'. Stakeholders within the supply chain generally did not consider that migrant workers in UK agriculture might face gender-related risks. None of the grievance mechanisms they encountered in their research had any consideration of gender in relation to their accessibility, for example, the option for women workers to be able to report gender related concerns to another woman. They also did not find any examples of farms that provided 'a specific and safe route (i.e. without fear of facing intimidation or reprisals) for women to report sexual harassment'.³⁵

Responding to Defra's 2022, 2023, and 2024 surveys, a higher percentage of women said they did not know how to raise a complaint if they were unhappy with their employment (2022: W:35%; M:28.3%, 2023: W:26.3%; M:20.6%, 2024: W:22.9%; M:16.9%). FLEX's research found that certain barriers to seeking help or support for a work-related issue more acutely affected the women respondents to the survey. For example, language barriers (W:28.2%; M:24%), fear of losing their job (W:30.9%; M:24.4%) and fears relating to their immigration status (W:10.9%; M:5.9%) were more likely to inhibit women than men from seeking support for a work-related issue. FLEX survey data also found that women were less likely to have been approached by an auditor or labour inspector to discuss working conditions (W:4.5%; M:10.7%).

Low pay and restrictive visas limit workers' ability to negotiate decent work.³⁶ Where workers rely on their employer for their right to work and stay in the UK, for their accommodation in the UK, as well as relying on their wage for survival with imposed limitations on their ability to transfer or find alternative employment, workers may feel unable to report or leave poor or exploitative working conditions. In the case of seasonal workers, earning back any debt accrued to pay for their visa and flights may trap workers into staying or returning on the scheme. Women we interviewed talked about feeling prohibited from leaving:

"It's terrible and I want to go back home but I also need to earn money."

Woman in her mid forties from a Central Asian Nation. 2022.

"No one wants to come back to work here, they only come because the financial circumstances make them come."

Woman in her early thirties from a Central Asian Nation. 2023.

35 Lara Bianchi and Oana Burcu, '[Seasonal Migrant Workers in the UK Agricultural Sector: Grievance Mechanisms and Access to Remedy](#)' (University of Nottingham Rights Lab, 2024).

36 Focus on Labour Exploitation (FLEX), '[Creating a Safe and Fair UK Immigration Policy for Workers](#)' (2022).

Some of the women that we interviewed highlighted that their need for work was also determined by their need to earn money for their children:

“There’s nothing I can do, especially since I also borrowed that money and I also have to send [money] to the children, since the children are at school, the necessities are big.”

Woman in her mid forties from a Central Asian Nation. 2022.

“What are we supposed to do here? Did we come here to rest? We came here to work. We left our families behind, our children. What funds can we send them?”

Woman in her early thirties from a Central Asian Nation. 2023.

Research into gendered aspects of agricultural work in Spain found that the industry utilises migrant mothers’ need to provide and care for children. Moroccan women are targeted for recruitment into seasonal agricultural work in Spain, since they need to earn money to support their families and are seen as low risk of overstaying their visa - as they will return to their families.³⁷

7. Conclusion and recommendations

This briefing has considered some of the ways in which risks related to the design of the SWS and the associated restrictive seasonal worker visa can combine with structural gendered dynamics and create greater risks of labour exploitation for certain workers. FLEX’s research into the seasonal worker scheme found that women on the scheme are more likely to have entered into debt to join the scheme and may face more barriers to recovering that debt, such as not receiving the pay they expected, or being assigned roles that do not have the possibility for earning bonuses. Women on the scheme had mixed views about roles on farms being separated by gender and more research is needed to understand how this impacts workers’ earning potentials. FLEX research found that women were less likely to have a successful transfer and may be further limited from leaving exploitative working conditions due to the need to care and provide for children in their home country. When combined, these risks can create situations where women workers feel dependent on their employer and feel unable to leave poor or exploitative conditions.

Living in mixed-gender accommodation in cramped conditions with very little privacy created significant safety concerns for women on the scheme. The cases of sexual harassment identified in FLEX’s research evidences the need to ensure farms on the scheme are better equipped to address situations of sexual harassment and other forms of gender based violence in the workplace. The experiences of sexual harassment examined in this research exemplify how gender inequalities, combined with the restrictive nature of the seasonal worker scheme and low waged work, can create accumulated layers of disadvantage that can lead to increased risk of abuse and additional barriers to enforcing rights at work. Labour market enforcement must consider the ways in which gender and other protected characteristics interact with experiences of workplace abuses as a crucial element for the identification of risk.

While this briefing specifically explores migrant women’s experiences working in UK agriculture, more research is needed to better understand how gendered experiences of the SWS intersect with other social inequalities such as race and nationality. In addition, further research is needed to be able to better investigate how people whose gender identity and/or gender expression expands beyond the gender binary are affected by gendered dynamics that increase risks of exploitation, since evidence shows they face

37 Ruiz-Ramírez, Castillo-Rojas-Marcos, and Molinero-Gerbeau, [‘Essential but Invisible and Exploited: A Literature Review of Migrant Workers’ Experiences in European Agriculture’](#).

Recommendations:

1. FLEX's research on the seasonal worker scheme has consistently evidenced that the design of the seasonal worker scheme creates risks of exploitation and undermines worker access to labour market enforcement and redress.³⁹ The scheme must be overhauled in its entirety to uphold the rights of workers.⁴⁰ This includes but is not limited to the need for improved independent monitoring of the scheme, including working and accommodation conditions, increased labour market enforcement of the scheme as well as pathways for redress and ensured access to rights for workers.
2. The scheme needs to be gender-responsive, ensuring that all actors involved, including labour providers, employers and labour market enforcement agencies have sufficient understanding of the experiences of women workers on the scheme and are able to mitigate risk and identify and respond to situations of abuse and disadvantage resulting from unequal gender dynamics.
3. This briefing demonstrates how risks of labour exploitation, including risks of debt bondage, issues with pay and workload, unsafe living conditions and risks of sexual harassment can be heightened by gendered cultural and structural inequalities for women workers on the seasonal worker scheme. For labour market enforcement on the route to be accessible to women workers in practice, the Fair Work Agency (FWA) must follow the principles outlined in FLEX's five-point plan for building gender-sensitive approaches to labour market enforcement,⁴¹ including:
 - I. Understanding the problem: identify the common forms of abuse on the SWS that can increase women workers' risk of labour exploitation.
 - II. Engaging experts: include a broad range of stakeholders and voices, to make sure that the work of the FWA is informed by women workers' experiences.
 - III. Making gender a strategic priority: ensure gender forms part of the strategies of the FWA, mainstreaming gender awareness across the agency.
 - IV. Establishing sector-specific enforcement strategies & tools: tailor enforcement strategies to meet the needs of women workers in different sectors, including agriculture, and adapt or develop tools for more gender-aware enforcement and prevention.

38 Em Rundall and Vincent Vecchietti, '(In)Visibility in the Workplace: The Experiences of Trans- Employees in the UK', in *Transgender Identities* (Routledge, 2010); Trades Union Congress (TUC), '[Sexual Harassment of LGBT People in the Workplace](#)' (2019); Trades Union Congress (TUC), '[BME Women and Work: TUC Equality Briefing](#)' (2020).

39 Focus on Labour Exploitation (FLEX) and Fife Migrants Forum, '[Assessment of the risks of human trafficking for forced labour on the UK Seasonal Workers Pilot](#)' (2021); Focus on Labour Exploitation (FLEX), '[Bearing Fruit: Making Recruitment Fairer for Migrant Workers](#)'; Focus on Labour Exploitation (FLEX), '[Bound to Work: Improving Access to Redress on the Seasonal Worker Scheme](#)'; Focus on Labour Exploitation (FLEX), '[Not Here for the Weather: Ensuring Safe and Fair Conditions on the UK's Seasonal Worker Scheme](#)'; Seasonal Worker Interest Group, '[ODLME Labour Market Enforcement Strategy 2025/26: Seasonal Worker Interest Group Submission](#)'.

40 Seasonal Worker Interest Group, '[Protecting Workers on the UK's Seasonal Worker Scheme: A Call to Action for the next Government](#)', 4 June 2024.

41 Focus on Labour Exploitation (FLEX), '[Women in the workplace: FLEX's five-point plan to combat labour exploitation](#)' (2018).

V. Taking a proactive approach: reach out to the most at risk workers on the SWS through proactive enforcement.

4. Labour market enforcement must be adequately resourced to proactively monitor and improve the enforcement of sexual harassment protections. This must include addressing how additional barriers such as low pay and immigration status inhibit workers from reporting sexual harassment at work.